

**Approved by
by decision of the Board of
Directors
JSC NC “KazMunayGas”
dated as of 13 February 2020,
protocol 1/2020**

**CONFIDENTIAL INFORMING POLICY
OF THE JSC NC “KAZMUNAIGAS”**

Nur-Sultan, 2020

1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. The Confidential Informing Policy of JSC NC "KazMunayGas" (hereinafter – the Policy) sets out the main principles, goals and objectives of the confidential information system in JSC NC "KazMunayGas"(hereinafter –KMG).

1.2. The policy sets out the procedure for obtaining and processing information about signs of corrupt behavior or fraud, and the procedure for responding to reported facts.

1.3. The confidential information system is used for the following purposes:

- creating an effective mechanism for receiving, processing and responding to incoming reports of violations in the activities of KMG and its subsidiaries, its Employees and Counterparties that are relate to participation or suspicion of participation of KMG or its subsidiaries, its Employees or Counterparties in corrupt behavior, fraud or any unethical actions;
- preventing and countering conflicts of interest, fraud, misconduct, and corruption, including abuse of office;
- improving the organization of the anti-corruption and fraud framework in KMG and its subsidiaries and affiliates, and improving the effectiveness of measures set out in the anti-corruption Policy of KMG and its subsidiaries.

1.4. Communications received within the framework of the Law of the Republic of Kazakhstan "on the procedure for consideration of appeals of individuals and legal entities" that are not subjects to this Policy and are considered in accordance with existing internal documents of KMG.

1.5. Employees are required to report to the "Hotline" facts of participation or suspicions about the participation of KMG or its subsidiaries, its Employees or Contractors in corrupt behavior, fraud or other illegal actions.

1.6. Representatives of KMG's Counterparties and its subsidiaries have the right to report to the "Hotline" facts of participation or suspicions about the participation of KMG and its subsidiaries, its Employees or Counterparties in corrupt behavior, fraud or other illegal actions.

1.7. The compliance service provides the "Hotline" activity and is the responsible division of KMG for conducting and coordinating actions for receiving, processing and responding to incoming messages.

1.8. In accordance with the KMG code of business ethics, information about violations of the provisions of the KMG Code of business ethics must be reported by Employees of KMG or its subsidiaries to the "Hotline", including, but not limited to information about bribery, corruption, conflicts of interest, violations of the requirements established in relation to accounting and financial reporting, fraud (including, but not limited to abuse of authority, embezzlement, or property damage to KMG), unfair competition, violations of the requirements for hospitality and gifts.

1.9. Reports of discrimination on any grounds, labor disputes and other labor issues should be sent to the KMG Ombudsman, who reviews all reports in accordance with KMG's internal procedures and the KMG code of business ethics.

1.10. When receiving messages from Employees of KMG joint ventures or jointly controlled companies that have their own Hotline, as well as from employees of KMG International N. V., or associated with these companies, the compliance Service

is obliged to accept, process and respond to such messages in accordance with the Policy.

2. FIELD OF APPLICATION

2.1. The Policy provisions are mandatory for all Employees and Officials of KMG.

3. DEFINITIONS AND ABBREVIATIONS

“Hotline”	A set of organizational and technical measures that make it possible to contact KMG with information about violations in the activities of KMG or its subsidiaries, its Employees and Counterparties that relate to participation or suspicion of participation of KMG or its subsidiaries, its Employees or Counterparties in corrupt behavior, fraud or any unethical actions, as well as subsequent processing and response to these messages.
Subsidiaries and affiliates (S&A)	Subsidiaries and affiliates, including jointly controlled entities and joint ventures of KMG.
Applicant	Any person who contacted the «Hotline».
Counterparty	An individual or legal entity with which KMG has concluded or plans to conclude a contract / agreement.
Employee	A person who has an employment relationship with KMG and directly performs work under an employment contract, as well as other persons engaged under an agreement through agencies and a civil contract.
Responsible person	Head of Compliance Service or compliance officer nominated by the Head of Compliance Service, whose responsibilities include receiving, processing and responding to the incoming "Hotline" message.
External independent organization ("Hotline«»)	An external independent confidential information organization that receives reports about potential violations of anti-corruption legislation that have been committed or are being committed, as well as on other issues provided for in this Policy.
KMG	JSC NC "KazMunayGas".

4. RESPONSIBILITY

4.1. The Compliance Service is responsible for:

- 1) implementation and updating of the Policy;
- 2) organizing training on Policy provisions.

5. THE PROCEDURE FOR INFORMING

5.1. Employees or any other persons, if they become aware of non-compliance with anti-corruption legislation and internal documents, should immediately inform about it in accordance with paragraph 5.2. At the same time, Employees must ensure that the information disclosed is accurate and that such disclosure is made in good faith. However, an Employee or a third party is not required to conduct any investigation of cases of non-compliance with anti-corruption legislation or internal documents of KMG.

5.2. Employees and other persons may at their discretion report their concerns about a potential violation.

5.2.1. Employees can contact their direct supervisor. In this case, information is provided in person or in writing. If the information is provided in writing, it is preferable to state the background and chronology of the issue of concern to the Employee and indicate the reasons for such concern.

5.2.2. Employees can contact a higher-level Manager if the issue in question is related to the direct Manager or if the Employee prefers not to discuss the issue directly with the higher-level Manager. It is also preferable that the issue and reasons for concern be clearly stated in writing.

5.2.3. Direct Manager / Senior Manager:

- receive reports of possible violations;
- ensure that their Employees are aware of this Policy and the established procedure;
- encourage an open working environment for Workers who can easily express concern;
- review the message properly;
- consider making recommendations to the person who has expressed concern or are personally involved in the matter;
- consider the need for an investigation
- resolve concerns, if possible;
- if it is impossible to resolve this issue, send it to the Compliance Service.

5.2.4. Employees can contact the Compliance Service

In addition to reporting to the direct / superior Manager, if the Employee chooses not to discuss the issue of concern, the Employee can contact the Compliance Service in writing. Employees are encouraged to provide information of the message in accordance with Annex 1 to this Policy.

5.3. Employees and other individuals may contact an External independent organization on a confidential and anonymous basis in one or more of the following ways:

- a single «Hotline» email address for KMG and its subsidiaries: sk.hotline@deloitte.kz;

- toll-free phone line: 8 800 080 19 94;
- web platform: www.sk.deloitte-hotline.com.

All messages sent over one of the above communication channels are processed by the Compliance Service.

Information can be provided in the state, Russian, and English languages.

Information can be sent to the «Hotline» in an anonymous form. However, it is difficult to respond properly to an anonymous message, since it may be necessary to obtain additional information or disclose the information provided by the Applicant. The presence of the applicant's data and the ability to communicate with Them allows you to consider the message more carefully and effectively. KMG encourages Applicants to provide their names and contact information to assist in further investigation and inform Applicants of the results achieved.

KMG will not attempt to violate the Applicant's anonymity, except as required by applicable law.

An external independent organization transmits all received messages to the Responsible person on the basis of confidentiality, and if the Applicant wishes to remain anonymous – on the basis of anonymity.

5.4. The responsible person is obliged to consider all messages received by the compliance Service and / or the «Hotline», regardless of the method and form of information communication.

5.5. All received messages are reflected by the Responsible person in the message Register in accordance with Annex 2 to the Policy.

5.6. After receiving the message, the Responsible person performs a preliminary check on the received reports of violations in the following order:

5.6.1. Compliance with the nature of the violation message is established. If the information is a message about the facts specified in paragraph 1.9 of the Policy, the Responsible person shall transmit the message to the KMG Ombudsman within 24 hours of receiving the information and inform the Applicant of such transfer.

5.6.2. If the received information, is not the information specified in paragraphs 1.8 and 1.9 of the Policy, and is not information about any violation of the legislation of the Republic of Kazakhstan, other applicable legislation or internal documents of KMG, the compliance Service reserves the right not to respond to the received message. In this case, the received materials are documented, a mark is made about non-response to the received information.

5.6.3. The significance of the violation report, the reliability of the information received, and the degree of trust in the source of the information are evaluated. If the significance, reliability of the received information or the possibility of trust in the Applicant is not confirmed, the received materials are documented, a mark is made on non-response to the received information.

5.6.4. If a decision is made to respond to the received information, the message is considered in accordance with the internal documents of KMG. The purpose of reviewing the information received is to confirm the reliability of information about a potential or committed offense and, if necessary, take appropriate measures based on the results of an internal investigation.

5.7. The actions specified in paragraph 5.6 of the Policy are carried out for each report/suspected violation as soon as possible, but no more than within 72 working hours from the moment of receiving the information.

5.8. The responsible person is obliged to immediately inform The head of the compliance Service about any messages that:

5.8.1. related to, or suspected of being associated with, significant fraud or other illegal activities that may affect the ability of KMG and its subsidiaries to conduct business;

5.8.2. are or are likely to be related to a significant or widespread fact of insufficient internal control or inefficiency of a significant process;

5.8.3. it is assumed that they may significantly damage the reputation of KMG if the facts are made public, or they may lead to significant discrepancies with KMG's.

5.9. If there is a contact for feedback, the Responsible person informs about the receipt of the message within 72 working hours by a written response, regardless of the method of receipt.

6. REPORTING

6.1. The Compliance Service reports quarterly to the Audit Committee and the Board of Directors of KMG on reports received by the Compliance Service and an External independent organization, as well as on the status of reviews. The information must contain:

- number of messages received;
- the number of relevant reports (accepted for investigation, on which there are specific facts or preliminary information) that were investigated;
- information about whether the message was confirmed or not (in the case of partial confirmation (if part of the message was confirmed), it is necessary to indicate what was confirmed);
- information about the disciplinary and/or corrective measures taken (with indication of deadlines and priority);
- the area of activity in which the violation was committed (procurement, labor conflicts, conflicts of interest, fraud, etc.).

6.2. If a report is received regarding members of the KMG management Board or persons accountable to the KMG Board of Directors, the Compliance Service sends a copy of such reports to the members of the Audit Committee of the Board of Directors within 24 hours.

6.3. Upon request, reporting on received messages is provided to JSC "Samruk-Kazyna".

7. MONITORING AND TUITION

7.1. KMG welcomes the Workers who are ready for an open discussion of the Policy and positively refers to any constructive proposals for its improvement.

7.2. The KMG Board of Directors reviews the policy requirements on a regular basis (as necessary or every two years) in order to update and improve it, and if

necessary, makes changes and/or additions to It, taking into account the proposals and recommendations of the KMG Board of Directors Audit Committee.

7.3. The policy should be clear and accessible to every employee. All new Employees are required to undergo training in Politics as part of tuition seminars on anti-corruption issues or as part of an adaptation course.

7.4. In order to increase the awareness of the Workers about the availability of the «Hotline», the Compliance Service regularly (every six months) distributes among the KMG Employees and its subsidiaries and affiliates, and also publishes a website and a corporate newspaper.

8. PROTECTION OF INFORMATION RECEIVED ON THE «HOTLINE»

8.1. The responsible person, as well as other Employees involved in the consideration of messages, are obliged to use the information transmitted to the "Hotline" as part of the performance of their official duties.

8.2. KMG protects the Applicant who has sent a violation report from any negative manifestations or actions of KMG Employees or representatives of KMG's Counterparties caused by such an applicant sending a violation report.

List of information that is recommended to be reflected in the message

- Contact details (specified at the discretion of the Applicant):
 - surname, first name, patronymic;
 - status of the Applicant (Employee of KMG or its subsidiaries, representative of the KMG Counterparty, third party);
 - contact information (phone number, email address)
- Theme of the message (for example, corruption, bribery, fraud, conflict of interest)
- The violation is reported and details: what, when, where and how did the described offense, or the planned offense, who has committed a violation as this violation is associated with the KMG or its subsidiaries, and any other information required for the consideration of the message.
- Additional question:
 - Would you like us to contact you? (if Yes, you must provide contact information)
 - Would you like to receive information about the results of consideration of Your message?
 - Will you be able to provide documents or other materials confirming the facts stated in the violation report?