 <b>КазМунайГаз</b> <small>NATIONAL COMPANY ҚАЗАҚСТАН РЕСПУБЛИКАСЫНЫҢ АТҚАМУ ҚОҒАМЫ</small>	<b>Joint Stock Company “National Company “KazMunayGas”</b>	
Document name:	<b>Internal Control Rules of JSC NC “KazMunayGas” for Delimiting the Rights of Access to Inside Information and Preventing the Possibility of Unlawful Use of Such Information by Insiders</b>	
Type of document: <b>IMS Rules</b>	<b>KMG-PR-2150.3-47</b>	Page <b>1</b> of <b>14</b>
Developed by: Sh. Nurbayeva  от 22 февраля 2023 г.	Reviewed by: R. Makashev  от «___» _____ 20__ г.	Approved by the resolution of the Management Board of JSC NC “KazMunayGas” No.37/23 dated August 9, 2023 Approved by the resolution of the Board of Directors of JSC NC “KazMunayGas” No.18/23 dated August 31, 2023

## **1. Purpose of the Document and General Provisions**

1.1. Internal Control Rules of JSC NC “KazMunayGas” for Delimiting the Rights of Access to Inside Information and Preventing the Possibility of Unlawful Use of Such Information by Insiders (the Rules) are developed in accordance with the laws of the Republic of Kazakhstan, Charter of JSC NC “KazMunayGas” (KMG), Corporate Governance Code of Samruk-Kazyna Sovereign Wealth Fund JSC, in accordance with international requirements applicable to KMG in connection with the inclusion and presence of securities issued by KMG in the list of securities traded on a stock exchange operating in a foreign jurisdiction, the KMG Information Disclosure Policy and other by-laws of KMG.

1.2. The purpose of the Rules is to establish a procedure for KMG inside information use as well as the principles and systems for monitoring KMG's compliance with its obligations in accordance with applicable legal and regulatory requirements for transparency and disclosure of information.

1.3. The Rules shall be posted in the national, Russian and English languages on the corporate website, and also provided to insiders upon their request.

1.4. Issues not regulated by the Rules shall be resolved in accordance with the requirements of the Republic of Kazakhstan laws and KMG's internal documents.


1.5. The Rules reflect the requirements of the legal framework at the date of their adoption. If, due to changes in legislation, certain clauses of the Rules come into conflict with it, those clauses shall become invalid. Until the moment of making changes to the Rules, applicable law and regulatory requirements shall apply.

1.6. The Rules shall come into effect from the date of approval by KMG's Board of Directors.

## **2. Scope of Application**

2.1. These Rules apply when using KMG inside information and contain the following:

- 1) list of insider-related information;
- 2) procedure for maintaining the list of insiders and keeping it up to date;

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3) procedure and terms for notifying persons on their inclusion in the list of insiders and the procedure for excluding them from this list, on the restrictions and obligations provided for by laws and regulations, and the Rules, on the liability for inside information illegal use;

4) procedure and terms for disclosing inside information;

5) procedure and terms for submission to KMG by individual legal entities that are insiders of information about their employees who, by virtue of their official position and job duties, have access to inside information;

6) other provisions allowing for control over disposal and use of inside information.


2.2. These Rules apply to all persons having access to KMG's inside information.

2.3. The Rules are binding on all KMG Business Units, officials and employees, as well as other persons recognised as KMG's insiders.


### 3. Definitions and Abbreviations

3.1. The following definitions and abbreviations are used in these Rules:

<b>Depository for Financial Statements</b>	An electronic database containing annual financial statements and audit reports submitted annually by organizations, lists of affiliates of joint-stock companies, as well as information on corporate events of joint-stock companies, with public user access. Information and Accounting Centre JSC is the body authorised by the Government of the Republic of Kazakhstan to maintain a depository of financial statements;
<b>Official</b>	Members of KMG's Board of Directors and Management Board, as well as any other person authorised by law, another legal act or document of KMG to act on behalf of KMG;
<b>Fund</b>	Samruk-Kazyna Sovereign Wealth Fund JSC;
<b>Closed Period</b>	Period of time specified in Clause 5.6 of the Rules, during which transactions with KMG's securities are prohibited to individuals who are insiders;
<b>Significant Effect</b>	Significant effect on the market value of KMG's Securities and related financial instruments caused by the Disclosure;
<b>Insider</b>	A person who has access to inside information
<b>Inside Information</b>	Any reliable information of a Precise nature related directly or indirectly to KMG and not publicly available, until the official the disclosure of which may have a Significant Effect on the market value of KMG's Securities (derivative

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	financial instruments) and its corresponding financial assets;
<b>KMG</b>	Joint-Stock Company “National Company “KazMunayGas”;
<b>Corporate Website</b>	Official electronic site on the Internet resource owned by KMG meeting the requirements established by the authorised body and having the following Internet address: <a href="http://www.kmg.kz">www.kmg.kz</a> ;
<b>Confidential Information</b>	Information constituting an official, commercial secret, which has an actual or potential commercial value due to being unknown to third parties, to which there is no free access on a legal basis and (or) disclosure of which may put KMG at a competitive disadvantage, personal data and other secrets protected by the laws of the Republic of Kazakhstan. The list of Confidential Information shall be approved by a decision of the authority in accordance with the Charter and other internal documents of KMG;
<b>Corporate Event</b>	An event that has a material impact on KMG's activities, affecting interests of shareholders and investors, and the disclosure of which is provided for by the laws of the Republic of Kazakhstan;
<b>Person Performing Management Functions (PPMF)</b>	Members of the administrative and management staff of KMG or managers of KMG's business units, who have regular access to inside information and the authority to make managerial decisions impacting further development and business prospects of KMG;
<b>Outstaffing</b>	Recruitment of personnel by the company/organization with the registration of their labour relations in the staff of the provider company. At the same time, the employee performs the employment duties regulated by the company/organization, but the obligations of the employer in relation to him/her are performed by the provider company;
<b>Manipulation in the Securities Market</b>	Activities of securities market players aimed at establishing and (or) maintaining prices for securities higher or lower than those that were established as a result of an objective ratio of supply and demand, giving the appearance of trading in a security and (or) completing a transaction using inside information;
<b>Responsible Structural Unit</b>	KMG's Compliance Service;
<b>Employee</b>	A person who has an employment relationship with KMG and directly performs work under an employment contract,

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	as well as outstaffing employees;
<b>Information Disclosure</b>	Timely public disclosure of information on KMG's activities, including in the amount, manner, methods and forms established by the laws of the Republic of Kazakhstan, KMG's Charter, applicable rules of Stock Exchanges and other internal documents of KMG;
<b>Mass Media</b>	A periodical printed publication, television, radio channel, documentary film, audiovisual recording and other form of periodical or continuous public distribution of information, including web-sites;
<b>Authorised Body</b>	State body that regulates the securities market in the Republic of Kazakhstan;
<b>KMG's Securities</b>	Any publicly traded or listed securities of KMG or any securities convertible into such securities;

#### **4. Responsibility**


4.1. Heads of KMG's Business Units are responsible for:

- 1) complete, reliable and timely nature of the information provided to the Responsible Structural Unit for inclusion in and exclusion from the list of insiders;
- 2) compliance with the procedure, conditions and terms for disclosing inside information established by the laws of the Republic of Kazakhstan, the Rules and other internal documents of KMG.

4.2. The Responsible Structural Unit is responsible for the implementation of the following measures for delimitation of rights of access to inside information and prevention of the possibility of unlawful use of such information by insiders:

- 1) compilation and timely updating of the list of insiders based on the information provided by the Heads of KMG's Business Units;
- 2) ensuring the timely submission of the list of insiders to stock exchanges and authorised body (upon their request);
- 3) notification of persons about inclusion in the list of insiders;
- 4) notification of persons about exclusion from the list of insiders;
- 5) notification of persons about the open and closed period.

4.3. Insiders are liable under the laws of the Republic of Kazakhstan for violation of laws of the Republic of Kazakhstan in terms of inside information and the Rules.

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4.4. KMG may demand from the insiders at fault for using, disclosing, distributing or otherwise handling inside information, a compensation for damage caused to KMG by those illegal actions.


## **5. Process Description**

### **5.1. List of Inside Information**

KMG’s inside information includes the following information:

- 1) financial statements of KMG;
- 2) information other than financial statements regarding the financial position of KMG;
- 3) information about changes in KMG’s operations affecting the interests of securities holders, as well as information about KMG’s corporate events:
  - changes in the composition of KMG bodies;
  - changes in the composition of shareholders holding ten or more percent of KMG’s voting shares;
  - restructuring or winding up of KMG, its subsidiaries and dependent joint-stock companies;
  - seizure of KMG’s property;
  - pledge (re-pledge) of KMG’s property in the amount of five percent or more of KMG’s assets;
  - obtaining, suspension or revocation of a KMG license;
  - resolutions adopted by the general meeting of shareholders of KMG;
  - resolutions adopted by the Board of Directors on the list of issues, information on which shall be reported to shareholders and investors under KMG’s by-laws;
  - changes in the list of organizations wherein KMG holds ten or more percent of the shares (interests, units) of each such organization;
  - changes to the stock issue prospectus;
  - issue of shares and other securities by KMG and approval by the authorized body of KMG placement report, KMG securities redemption reports, cancellation of KMG securities by the authorized body;
  - settlement of large transactions by KMG and transactions that simultaneously meet the following conditions: are interested-party transactions and transactions related to the acquisition or alienation of property, the value of which is ten or more percent of the total book value of the company’s assets as of the date of the resolution by the authorized body of the company to conclude such transactions. Information about the transaction, as a result of which property is acquired or alienated in the amount of ten or more percent of the company’s assets, shall include information about the parties to the transaction, the acquired or alienated assets, the terms and conditions of the transaction, the nature and amount of the participation interests of the parties involved, as well as when other information about the transaction is available;
  - obtaining a loan by KMG in the amount of twenty-five percent or more of the KMG’s equity;



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obtaining permits by KMG to carry out any types of activities, suspension or termination of permits previously obtained by KMG to carry out any types of activities;  
 participation of KMG in incorporation;

occurrence of any circumstances of emergency nature, as a result of which the property of KMG was destroyed, the book value of which amounted to ten or more percent of the total assets of KMG;

instituting administrative action against KMG and its officials; institution of a corporate dispute case in court;

decisions on judicial restructuring of KMG;

4) other information classified as KMG’s inside information, as well as defined as inside information under the law of the Republic of Kazakhstan.

Information is inside upon its occurrence and until its disclosure to the public under the law of the Republic of Kazakhstan and/or these Rules.

5.1.1. The following information may constitute Inside Information:

1) information on events and changes in circumstances that may have a Significant Effect on KMG;

2) information on the conduct of KMG's activities in the past or currently, including any periodic performance reports, as well as information on changes in KMG's expectations in relation to the future activities, including any plans of KMG that may have a Significant Effect on KMG. Guidelines for determining Significant Effect are set out in KMG-F-3933.2-47/KMG-PR-2150.3-47 hereto;

3) information on projects and transactions (including those related to the acquisition, exchange and disposal of shares or rights to oil and gas assets, establishment or termination of joint ventures and consortia, financing and commercial conditions for transactions relating to oil and gas assets) and events of a strategic nature, on all stages from start to finish.

## **5.2. Definition of Insiders. Procedure for Maintaining and Keeping up to date the List of Insiders**

5.2.1. The following persons are recognised as insiders:

1) PPMFs and employees who have access to inside information by virtue of their official position and job duties;

2) persons who have access to inside information due to owning, using and (or) controlling, directly or indirectly, ten (10) or more percent of KMG's voting shares, as well as employees of such persons;

3) audit firm, an appraiser, professional participants of the securities market and other persons rendering services to KMG under a concluded agreement (including verbal) providing for the inside information disclosure;

4) trading organiser, the list of which includes the Securities (derivative financial instruments) issued (submitted) by KMG;

5) members of the Board of Directors of the stock exchange, listing commission of the stock exchange, in the trading system of which transactions with KMG's Securities and other financial instruments are made;

6) employees of the authorized body, the National Bank of the Republic of Kazakhstan and its departments, civil servants who have access to inside information by virtue of their functions and authorities assigned to them;

7) public associations and professional organisations, the members of which are KMG and the organisations specified in sub-clauses 5.2.1.-2),3),4) of the Rules that have access to inside information by virtue of authorities granted to them;

8) employees of the organisations specified in sub-clauses 5.2.1.-2),3),4),7) of the Rules who have access to inside information by virtue of their official position and job duties;

9) persons who received inside information from the persons specified in sub-clauses 5.2.1.-1)-8) of the Rules.

5.2.2. Information on persons included in the list of insiders shall be provided by KMG's Business Units to the Responsible Structural Unit within three (3) working days from the date of occurrence of legal relations with such persons.

5.2.3. Upon termination of an employment contract with an employee who is an insider and (or) the loss by the employee of the insider status, KMG's Business Units shall provide such information to the Responsible Structural Unit within three (3) working days from the date of termination of the employment contract and (or) the loss by the employee of the insider status. The basis for removal of the employee from the list of insiders is an office memorandum from the immediate supervisor of the employee about the loss by the employee of the insider status.

5.2.4. In order to ensure control of disposal and use of inside information, the Responsible Structural Unit shall compile and maintain the List of Insiders specified in sub-clauses 5.2.1.-1)-4) of these Rules, in the form specified in KMG-F-2154.3-47/KMG-PR-2150.3-47 hereto. The List of Insiders includes two types of lists:

1) permanent Insiders section of the List of Insiders shall include all PPMFs and Employees in accordance with the Rules, consultants or contractors of KMG who, in the normal course of their duties, have regular access to Inside Information.

2) section of the List of Insiders relating to a specific transaction or a specific event should include all employees of KMG, consultants or contractors of KMG who, in relation to a specific issue, have special (ad hoc) access to Inside Information.

5.2.5. The List of Insiders should be reviewed annually and, in any case, should be updated in a timely manner as necessary in the following cases:


1) when the reason for a person's inclusion in the List of Insiders and remaining herein changes;

2) when a new person, who has access to inside information and who should be included in the List of Insiders, appears;

3) when a person ceases to have access to inside information and can be excluded from the List of Insiders.

5.2.6. The Responsible Structural Unit shall keep the List of Insiders for at least five (5) years from the date it was compiled or updated.

5.2.7. In accordance with the Rules, PPMFs and Employees shall not:

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- 1) use inside information when entering into transactions with KMG's Securities (derivative financial instruments);
- 2) transfer inside information or make it available to third parties, except for the cases provided for by the laws of the Republic of Kazakhstan;
- 3) provide third parties with recommendations and proposals for transactions with KMG's Securities based on inside information.

At the request of the authorised body, the Responsible Structural Unit shall submit the List of Insiders within the terms specified in such request.

### **5.3. Procedure for Notifying Persons on Inclusion in and Exclusion from the List of Insiders**

5.3.1. To prevent the possibility of unlawful use of inside information by insiders, the Responsible Structural Unit shall notify the relevant persons in writing using KMG-F-4633.1-47/KMG-PR-2150.3-47 hereto on the following:

- 1) inclusion of the persons in the list of insiders, including those with access to KMG's financial statements;
- 2) restrictions (for individuals and legal entities);
- 3) obligations (for legal entities) stipulated by the laws and the Rules;
- 4) liability for illegal use of inside information;
- 5) prohibition of transactions with KMG's securities during the closed period.

5.3.2. The Responsible Structural Unit shall notify the persons included in the List of Insiders about their inclusion in (exclusion from) the List of Insiders, the requirements of the law and these Rules by sending a notice to such Insiders.

5.3.3. A notice on a person's inclusion in or exclusion from the List of Insiders using KMG-F-4633.1-47/KMG-PR-2150.3-47 or KMG-F-4634.1-47/KMG-PR-2150.3-47 respectively shall be sent by the Responsible Structural Unit by e-mail to KMG/or in hard copy to the insider's mailing address within five (5) working days of occurrence of the reason for including such a person in or excluding the person from the List of Insiders.


5.3.4. The Insider shall complete it and submit the original hard copy of the notice to the Responsible Structural Unit within two (2) working days from the date of receipt of the notice of inclusion in the List of Insiders (KMG-F-4633.1-47/KMG-PR-2150.3-47).

5.3.5. If the Responsible Structural Unit does not have the e-mail, postal address of the insider due to the failure of the insider to provide information, this information shall be provided by the Human Resources Management Department at the request of the Responsible Structural Unit.

### **5.4. Responsibilities of Insiders. Ensuring the Confidentiality of Inside Information. Restrictions for Insiders**

5.4.1. Inside information shall be confidential until its disclosure.



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5.4.2. Officials and employees of KMG who have access to inside information shall:

1) ensure that the necessary measures are taken to restrict access to inside information for other KMG's employees who do not need this information to perform their official duties, as well as third parties;

2) in case of loss of the status of a person entitled to access inside information, transfer to the line manager all information carriers at his/her disposal containing inside information on paper and electronic media, while office equipment and other property of KMG are transferred as per the procedure established by KMG's internal documents.

5.4.3. KMG's employees shall immediately communicate to their line managers and the Responsible Structural Unit any of the following facts:

1) KMG's inside information that shall not be disclosed by them on the need-to-know basis, but became known to them from third parties;

2) on the access of unauthorised persons to inside information;

3) unlawful use of KMG's inside information, including the use of KMG's inside information in the own interests of KMG's employees, KMG's insiders, KMG's partners, as well as in the interests of relatives of any of the above persons.

5.4.4. Upon establishing a threat or fact of unauthorised disclosure of inside information or loss of documents (information carriers) containing inside information, an insider being a KMG's employee shall immediately notify his/her line manager, who, in turn, shall immediately inform the Responsible Structural Unit about such threat or fact.

5.4.5. KMG's employees who have access to inside information should not discuss inside information in the presence of those who do not have access to inside information.

5.4.6. KMG shall provide the necessary organisational and technical conditions for non-disclosure of inside information by KMG's Business Units, including:

1) relevant requirements in employment and civil contracts;

2) availability of information and technological systems and tools for protecting the confidentiality of inside information, preventing loss of information and/or unauthorised access to it, including through communication channels;

3) other appropriate measures.


5.4.7. KMG's Business Units that use inside information in their activities shall store inside information in conditions that ensure an appropriate confidentiality regime for inside information.

5.4.8. Persons who do not have the right to access inside information, but who actually received access to it, shall:

1) cease to study the information;

2) take comprehensive measures to maintain the confidentiality of inside information;

3) exclude the possibility of dissemination or provision of inside information.

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5.4.9. In relations with other individuals and legal entities, KMG shall protect confidential and inside information in the manner prescribed by the laws of the Republic of Kazakhstan, these Rules and other internal documents of KMG.

5.4.10. KMG can provide to third parties an access to confidential information on a confidential basis and/or subject to execution of an appropriate agreement to maintain KMG's business and KMG's legal compliance.

## **5.5. Responsibilities of Individual Legal Entities that are Insiders**

Legal entities specified in sub-clause 2), 3), 4) and 7) of Clause 5.2.1 of the Rules shall:

1) maintain a list of their employees who, by virtue of their official position and job duties, have access to KMG's inside information, in respect of which these legal entities are recognised as insiders;

2) inform their employees about the acquisition of the status of a KMG insider, about the legal requirements prohibiting the use of inside information, in respect of which these legal entities are recognised as insiders;

3) inform KMG, in respect of which these legal entities are recognised as insiders, about their employees who, by virtue of their official position and job duties, have access to the issuers' insider information by e-mails and/or in hard copy to KMG's postal address within five (5) working days from the date of drawing up/updating the list of insiders.

## **5.6. Closed Period. Procedure for Notifying Insiders about the Start and End Date of the Closed Period. Transactions with KMG's Securities during the Closed Period**

5.6.1. In order to prevent manipulation in the securities market, including use of inside information, KMG establishes a closed period.

The closed period means:


1) a period from the end of the relevant financial year to and including the time of issue of KMG's annual financial statement or, where there is no such statement, to and including the time of publication of the annual financial report;

2) a period from the end of the relevant financial half year to and including the time of KMG's release of KMG's financial statement or, where there is no such statement, to and including the time of publication of the half-yearly financial report;

3) a period from the end of the relevant quarter to and including the time of KMG's release of KMG's quarterly financial statement or, in the absence of such statement, to and including the time of publication of KMG's quarterly financial report.

5.6.2. KMG's PPMFs and employees, who have access to inside information, are prohibited from entering into transactions with KMG's securities during this period, except for cases provided for by KMG's internal documents.

5.6.3. Information about the beginning and end of the closed period is posted on the corporate website of KMG.

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5.6.4. KMG may establish a special closed period. The start date and end date of special closed periods are announced by the Responsible Structural Unit based on the decisions of KMG's body to defer the disclosure of inside information and when the statement of deferral was not made.

## **5.7. Procedure and Terms for Disclosing Inside Information**

5.7.1. KMG's inside information is disclosed in the manner, on the terms and conditions established by the laws of the Republic of Kazakhstan, KMG's Charter, KMG's Information Disclosure Policy, the Rules and other internal documents of KMG.

5.7.2. Inside information can be disclosed in the following ways:

- 1) publication in the mass media;
- 2) placement on a corporate website <http://www.kmg.kz>;
- 3) posting information on the financial statements depository's website, as well as through authorised regulatory services and/or bodies of stock exchanges where KMG's securities are traded;
- 4) placement in the corporate newspaper of KMG <https://munailymeken.kz/>;
- 5) posting on the pages of KMG's official accounts in social media;
- 6) interviews, press conferences and meetings of KMG's authorised persons with stakeholders;
- 7) organisation of visits to KMG by investors, analysts and mass media representatives.


5.7.3. KMG shall bring to the notice of its shareholders and investors information on corporate events, including decisions made by the Board of Directors of KMG, and KMG's activities in the manner, terms, to the extent, in form and by the methods provided for by the laws of the Republic of Kazakhstan, applicable listing requirements and KMG's Charter, KMG's Information Disclosure Policy, KMG's Securities Transactions Policy, these Rules and other internal documents of KMG.

Other inside information, the terms of disclosure whereof are not determined by the laws of the Republic of Kazakhstan and (or) the rules of the organisers of trading, shall be disclosed by KMG as soon as possible, if the illegal distribution or leakage of such information impacts the value of Securities (derivative financial instruments) of KMG or its activities.

## **5.8. Response Measures in Case of Revealing Violations by Insiders of the Laws of the Republic of Kazakhstan and the Rules**

In case of revealing violations by insiders of the laws of the Republic of Kazakhstan and the Rules, KMG may undertake the following measures (including but not limited to):

- 1) internal investigation in order to identify the guilty persons or the source of inside information leakage;

 <b>КазМұнайГаз</b> <small>NATIONAL COMPANY ҰЛТТЫҚ КОМПАНИЯСЫ</small>	<b>Internal Control Rules of JSC NC “KazMunayGas” for Delimiting the Rights of Access to Inside Information and Preventing the Possibility of Unlawful Use of Such Information by Insiders</b>	
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2) informing the authorised body about a transaction with KMG's securities in order to recognise the transaction as being concluded for the purpose of manipulating the securities market;

3) disciplinary action in cases when it can be applied in accordance with the internal documents of KMG and the labour law of the Republic of Kazakhstan;

4) reimbursement of material damage and/or damage to business reputation caused to KMG by the actions of insider;

5) other permissible measures.

## 6. Process Criterion

Availability of up-to-date list of insiders in KMG and timely submission of information about them to the authorised body and stock exchanges (upon their request).

## 7. References

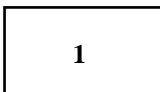

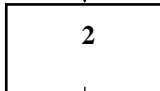



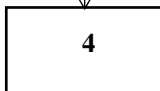



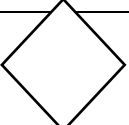
No. 415-II dated 13 May 2003	Law of the Republic of Kazakhstan on Joint-Stock Companies
No. 461-II dated 2 July 2003	Law of the Republic of Kazakhstan on Securities Market
No. 124 dated 26 July 2019	Resolution of the Management Board of the National Bank of the Republic of Kazakhstan on Approval of the Rules and Conditions for Disclosure of Information Relating to the Activity of the Issuer and Not in Public Domain
No. 1403 dated 5 November 2012	Resolution of the Government of the Republic of Kazakhstan on Approval of the Corporate Governance Code of Samruk-Kazyna Sovereign Wealth Fund JSC
Resolution of the Shareholders of JSC NC “KazMunayGas” dated 22.04.2016 (Minutes No. 13/16)	Charter of JSC NC “KazMunayGas”
Resolution of the Board of Directors of JSC NC “KazMunayGas” dated 11 November 2022, Minutes No. 19/2022	Securities Dealing Policy of JSC NC “KazMunayGas”
	Information Disclosure Policy of JSC NC “KazMunayGas”

## 8. Record Forms


KMG-F-2154.3-47/KMG-PR-2150.3-47	List of Insiders
KMG-F-3933.2-47/KMG-PR-2150.3-47	Guidelines for Determining Significant

	Effect on KMG's Securities Price
KMG-F-4633.1-47/KMG-PR-2150.3-47	Notice on a Person's Inclusion in the List of Insiders
KMG-F-4634.1-47/KMG-PR-2150.3-47	Notice on a Person's Exclusion in the List of Insiders

## 9. Block Diagram

<b>Process entry:</b>	<b>Need to establish a procedure for handling KMG's inside information</b>		
<b>Block Diagram</b>	<b>Action</b>	<b>Action Owner</b>	<b>Record</b>
	Providing information on insiders to KMG's Responsible Structural Unit (sub-clause 5.2.4.)	Business Units	Memo in EDMS
 	Compiling and updating the list of insiders (sub-clause 5.2.4.)	Responsible Structural Unit	KMG-F-2154.3-47/ PR-2150.3-47
 	Submitting information on insiders to the authorised body and stock exchanges (sub-clause 5.2.4.)	Responsible Structural Unit	KMG-F-2154.3-47/ PR-2150.3-47
 	Notifying persons of inclusion in the list of insiders, including those with access to KMG's financial statements (clause 5.3)	Responsible Structural Unit	KMG-F-4633.1-47/ PR-2150.3-47
 	Request by PPMFs, employees, persons having access to financial statements for permission to deal in KMG's securities during the closed period (clause 5.6)	PPMFs, employees, persons having access to financial statements	Memo in EDMS
 	Approving a securities transaction	Responsible	Resolution of the



 <p align="center"><b>6</b></p> <p align="center">no                      yes</p>	during the closed period (clause 5.6)	Structural Unit / Audit Committee of the Board of Directors for PPMFs	Responsible Structural Unit / Audit Committee of the Board of Directors for PPMFs
<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto; text-align: center; line-height: 20px;"><b>7</b></div>	Concluding KMG's securities transaction (clause 5.6)	Persons having access to KMG's financial statements	Information on the transaction made
<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto; text-align: center; line-height: 20px;"><b>8</b></div>	Disclosing inside information (clause 5.7)	Responsible Structural Unit, Press Service	Letters; reports; press releases; information on the corporate website and/or other media
<p><b>Process exit:</b></p>	<p align="center"><b>Regulated Procedure for KMG's Internal Control over the Disposal and Use of Inside Information</b></p>		