

**POLICY OF INTEGRITY CHECK OF COUNTERPARTIES OF
ISATAY OPERATING COMPANY LLP**

1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. The Policy of Integrity Check of Counterparty of Isatay Operating Company LLP (hereinafter – the Policy) has been developed in accordance with the laws of the Republic of Kazakhstan, the Code of Business Conduct, the Anti-Corruption Policy and other internal documents of the Partnership.

1.2 The Policy regulates the mechanism for conducting integrity check of the Partnership's Counterparties, as well as the analysis, processing and storage of information about the Counterparties.

1.3 The purpose of this Policy is to reduce the risks of material and non-material damage to the Partnership, limitation of relationships with unreliable Counterparties, as well as to avoid financial, corruption, reputational and other risks for the Partnership.

1.4 The Policy does not regulate the procedures for checking the Counterparty in the course of procurement through commodity exchanges or centralized trading in electricity.

1.5 This Policy does not apply to labor relations.

2. SCOPE OF APPLICATION

2.1. This Policy applies to the activities of the Partnership when checking the reliability of the Counterparties and during the period of validity of contracts upon request.

2.2. If the legislation of the Republic of Kazakhstan or other internal regulatory documents of the Partnership establish more stringent requirements than the provisions of this Policy, then the requirements of the legislation or provisions of other internal regulatory documents of the Partnership shall apply.

3. DEFINITIONS AND ABBREVIATIONS

Affiliate	means, in relation to any Party, any company, partnership, corporation or any other legal entity that Controls, is Controlled by, or is under common Control with such Party. "Control" or "controlled" means direct or indirect control of more than 50% (fifty percent) vote in any company, partnership, corporation or legal entity. The term "controls", "controlled" and other derivative terms shall be construed accordingly.
Budget Administrator	Director / Head of the structural subdivision of the Partnership which is the initiator of the procurement.
Close relatives	Parents (parent), children, adoptive parents, adopted children, siblings and half-siblings, grandparents, grandchildren.
Officials	A person performing the functions of the executive body of the Partnership (members of the Management Board).
Requestor	Employees, who are responsible for the organization and conduct of procurement of goods, works and services in accordance with their job descriptions, responsible for drawing up and sending a request for review of the Counterparty to the Responsible person, as well as the administrator of the budget.
Counterparty	Individual or legal entity with whom the Partnership has entered or plans to enter into a contract / agreement.
Conflict of Interest	Any situations or circumstances in which the Personal benefit or activity of an Employee or an Official of the Partnership contradicts the interests of the Partnership or may potentially conflict with them and thereby may lead to improper performance of their official duties and affect the objectivity of decisions on issues related to the Partnership.
Partnership	Isatay Operating Company LLP

Politically Exposed Person	<p>1) Public official is a citizen of the Republic of Kazakhstan who, in accordance with the procedure established by the legislation of the Republic of Kazakhstan, holds a state position paid from the republican or local budgets or from the funds of the National Bank of the Republic of Kazakhstan in a state body and exercises official powers in order to implement the tasks and functions of the state;</p> <p>2) An official is a person who permanently, temporarily or by special authority performs the functions of a representative of the authorities or performs organizational and administrative or administrative and economic functions in state bodies;</p> <p>3) A foreign official is an official of a foreign state, including members of a foreign public assembly, officials of international organizations, members of an international parliamentary assembly, judges of a foreign state and officials of an international court, as well as officials in the armed forces and other military formations of a foreign state.</p> <p>4) A person performing managerial functions in a quasi-public sector entity, as well as a person authorized to make decisions on the organization and conduct of purchases financed from the state budget and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit in these organizations, employees of the National Bank of the Republic of Kazakhstan and its departments.</p> <p>5) any officer, director or employee of an entity which is majority owned or controlled by any state.</p> <p>6) any political party or an official of a political party.</p>
Media	Mass media
Identification data	Name of the Counterparty / full name (in case of individual entrepreneur), business identification number (BIN), individual identification number (IIN) and other data.
Employee	A person who has an employment relationship with the Partnership and directly performs work under an employment contract, as well as other persons contracted through agencies and civil law contracts.
Relatives	Brothers, sisters, parents and children of the spouse.
Responsible person	An employee of the Partnership appointed in accordance with the established procedure and responsible for compliance issues and responsible for the verification of Counterparties.
Partners	NC KazMunayGas JSC, Eni Isatay B.V.
First Heads	General Director and Deputy General Director of the Partnership.
Management Board	Collegial executive body of the Partnership.
Rules	Rules for the acquisition by subsoil users and their contractors of goods, works and services used in hydrocarbon and uranium exploration or production operations, approved by Order of the Ministry of Energy of the Republic of Kazakhstan No. 196 dated 18 May 2018 (with appropriate amendments and additions) or another document replacing the current Rules, approved in accordance with the legislation of the Republic of Kazakhstan.

4. APPROACH AND TYPES OF INTEGRITY CHECK OF COUNTERPARTY

4.1. The Partnership shall conduct integrity check of Counterparties prior to or during a contractual relationship with them. The procedures described in the Policy shall apply to all new and existing Counterparties of the Partnership:

- before the conclusion of the contract with the Counterparty;
- every two years, provided that the contractual relationship with the current Counterparty is maintained;
- during contractual relations when establishing information about the change of key persons and / or owners / beneficial owners of the Counterparty.

4.2. Categorization of Counterparties

4.2.1. According to this Policy, all the Counterparties of the Partnership are divided into two categories:

- Counterparties of Group I
- Counterparties of Group II

4.2.2. The Counterparties of **Group I** include:

- a) Partners of the Partnership and their affiliated organizations;
- b) State bodies and departments, local self-government bodies, courts;
- c) organizations 100% owned by the state of the Republic of Kazakhstan or other states;
- d) large multinational companies listed on the stock markets of North America and/or Europe and/or Hong Kong and/or Japan and/or Singapore and/or Australia.

4.2.3. Counterparties of the Partnership that fall into Group I shall not be subject to verification.

4.2.4. The Counterparties of **Group II** include:

- a) Counterparties supplying goods / providing services / performing work above the value limit under this Policy (see Section 4.4);
- b) Banks, insurance companies and other financial institutions that are not in Group I;
- c) Associations, foundations, unions, cooperatives, chambers of commerce and other non-profit organizations (without limit);
- d) Counterparties involved in the targeted sale of assets and fixed assets of the Partnership (without limit);
- e) Counterparties engaged for the purpose of interacting with Politically Exposed Person on behalf of the Partnership or regularly interact with Politically Exposed Person as part of their contracted services (e.g. custom brokers, permitting companies, freight forwarders/international logistic transportation, tax or legal advisors) (without limit);
- f) Counterparties engaged for consultancy services (without limit);
- g) Counterparties engaged for sponsorships (without limit);
- h) Counterparties engaged for mergers, acquisitions, joint-ventures (without limit);

4.2.5. Categorization of the Counterparty into the required group (I or II) and its presence in the lists of exceptions to verification (Group I) is determined by the Responsible Person.

4.3. Types of integrity check of the Counterparty and in relation to business relationships, projects, transactions, activities and Non-profit Initiatives

4.3.1. In accordance with the provisions of the Policy, the following types of Counterparty verification are provided:

- Comprehensive verification of the Counterparty,
- limited verification of the Counterparty,
- verification of the Counterparty at the request of Partners.

4.3.2. Comprehensive verification of the Counterparty

The following situations are the grounds for comprehensive verification of the Counterparty:

- transactions with Counterparties classified as
 - Group II (a-b), provided that the purchase from a potential Counterparty will be made from a single source (except as specified in clause 4.3.3) above the value limit under this Policy;

- Group II (c-h) from open sources with available information provided by Counterparties
- sale of assets and fixed assets of the Partnership;
- other transactions or activities of the Partnership which does not fall into any categories listed in this Policy under a reasoned decision of the Responsible Person.

4.3.3. Limited verification of the Counterparty

The grounds for limited verification of the Counterparty are:

- the implementation of any procurement method by means of an open tender and from a single source on the basis of a failed open tender in accordance with the Rules and if the total cost of Services is less than the cost limit according to this Policy;
- transactions with Counterparties classified as Group I and Group II without limit;

4.3.4. Verification of the Counterparty on request

The grounds for the Counterparty's check are official requests from any of the Partners of any of the Officials to establish reliability, possible affiliation, conflict of interest and / or other risks.

Verification of the Counterparty on request will be carried out either to verify individual facts specified in the request or by comprehensive / limited verification of the Counterparty, or in relation to business relationships, projects, transactions, activities and Non-profit Initiatives.

4.3.5. Verification of business relationships, projects, transactions, activities and Non-profit Initiatives

Verification of business relationships, projects, transactions, activities and Non-profit Initiatives shall include evaluation of:

- risk associated with certain country, Counterparty;
- structure, value, nature and complexity of the envisaged transaction;
- envisaged financing and payment arrangements;
- profile of perspective Counterparty, recipients of Non-profit initiatives and other third parties (including Politically Exposed Person) involved in the envisaged transaction.

4.4. Cost limits

4.4.1. The Partnership should approach the determination of cost limits conservatively, with due diligence, based on the assessment of risks of fraud, corruption, as well as the availability of internal resources.

4.4.2 The cost limit under contracts for the purchase of GWS by means of the single-source procurement method (on the non-competitive basis and (or) internal competition) is an amount in tenge equivalent to or more than two hundred and fifty thousand (250,000) US dollars as of the date of sending the application for verification of the Counterparty.

4.4.3. If several agreements with the Counterparty are concluded below the cost limit, and the total amount of such agreements reaches the cost limit, such Counterparty shall be subject to verification under this Policy.

4.5. Process of initiation of integrity check of Counterparty

4.5.1. Prior to initiating of integrity check of Counterparty, the Initiator of the request prepares and sends an application for verification of the Counterparty to the Responsible Person.

4.5.2. The Initiator of the request is responsible for the following steps before sending the request

- providing data on the Counterparties in accordance with the requirements of the Isatay Operating Company LLP Procedure for Procurement of Goods, Works, and Services, the Rules, other applicable internal procedures and this Policy;
- requesting from the Counterparty falling into Group II the fully completed Counterparty Questionnaire (see Appendix No. 1), as well as documents necessary for its verification (see Appendix No. 2), except when the initiator of the request is the administrator of the budget line;
- if necessary, the Initiator of the request must request the missing documents from the Counterparty or the Counterparty's explanation of the reasons for their non-provision, except when the initiator of the request is the administrator of the budget item.
- sending all the Counterparty's submitted documents to the Responsible Person as part of the request to verify the Counterparty.



In cases where the initiator of the request is the administrator of the budget line, the request of documents from the Counterparty is carried out by the Responsible person.

4.5.4. Responsible person is responsible for the timeliness of check of the Counterparty, maintenance of the Register of received requests, conducted checks (including the date of the request, date of the report and type of check) in the form defined in Appendix № 3 of this Policy.

5. PROCEDURES FOR INTEGRITY CHECK OF COUNTERPARTY

Comprehensive integrity check of Counterparty

5.1. Comprehensive verification of the Counterparty is a complete check of the Counterparty and is carried out as follows:

5.1.1. For **legal entities**, the Responsible Person shall collect the maximum available information about the Counterparty using open sources of information (information and reference systems) and check the following:

- basic registration data of the Counterparty, including legal status (active / inactive), main and additional activities, data on the head, direct and indirect owner or owners (it is necessary to establish ownership to a natural person or persons), availability of licenses.

If the any direct or indirect owner of the inspected Counterparty belongs to the category of Group I companies, the inspection of such owner shall be performed according to clause 5.5. of this Policy. When a Counterparty/its direct or indirect owner is listed on stock markets, it will be necessary to identify owners holding at least 25% of shares directly or indirectly in the Counterparty from Group II, and owners holding at least 5% of shares directly or indirectly in all other Counterparties.

- whether the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner of the Counterparty is a Politically Exposed Person;

- revealing the facts of bringing heads (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner of the Counterparty to administrative / criminal responsibility,

- verification of the legal and actual address;

- tax registration, presence or absence of tax arrears and other obligatory payments;

- any pending litigation, bankruptcy or enforcement proceedings against the Counterparty;

- presence of encumbrances on any assets;

- availability of accounting (financial) statements for the last available financial year;

- whether the Counterparty / head and / or direct or indirect owner is not registered in foreign (including offshore) jurisdictions;

- whether the Counterparty / head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner is affiliated with other Counterparties of the Partnership, having common beneficiaries, address, phone number, e-mail or website;

- whether the Counterparty has an authorized capital less than the limit established by law;

- whether the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner of the Counterparty has enforcement proceedings and a ban on leaving the country;

- determination of the Counterparty's risk level based on the results of categorization by the State Revenue Committee. If a high degree of risk is identified, the Counterparty should be placed in the red zone;

- whether the head of the Counterparty is its sole founder;

- whether the Counterparty has its own corporate website;

- whether the head and / or owner / co-owner of the Counterparty is a head in five or more counterparty companies;

- whether the Counterparty was registered shortly before the conclusion of the contract (360 days or less);

- whether the Counterparty is affiliated with the employees of the Partnership involved in the contract award;

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- whether the Counterparty is an invalid legal entity;
- other negative information, such as information on any investigations, prosecutions relating to serious offenses with particular reference to offences related to corruption, money laundering, violation of human rights or fraud in relation to the Counterparty, its head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract and direct and indirect owners of the Counterparty available in open sources of information, as well as sources officially available to the Responsible Person;
 - the presence of the Counterparty / his head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner in the following lists:
 - whether the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner of the Counterparty is an employee of the Partners;
 - whether the Counterparty, its head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, or its direct or indirect owner is registered in the jurisdictions belonging to the List of offshore zones for the purposes of the Law of the Republic of Kazakhstan 'On Counteraction of Legalization (Money Laundering) of Proceeds from Crime and Terrorist Financing';
 - checking the presence of the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner of the Counterparty in the registration log and maintenance of information on Conflict of Interest in accordance with the internal documents of the Partnership on the settlement of Conflict of Interest in employees and officials;
 - whether the Counterparty is registered in the state registers of unreliable Counterparties;
 - information on the presence of the Counterparty / direct or indirect owner / head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract in the sanctions lists (national, international and unilateral or established by multilateral institutions sanctions lists or debarment lists of persons that are restricted or prohibited from contracting with public or government entities), the list of terrorist and extremist organizations;
 - information on the presence of the Counterparty, its head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner in the lists of affiliated persons of the Partners;
 - whether the Counterparty / head ((members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner is listed in the register of calls to the Hotline of the Partnership;
 - whether the Counterparty is in the list of debtors with overdue accounts receivable towards the Partnership or in the list of the Counterparties of the Partnership under claims procedures;
 - whether the Counterparty is in the list of companies whose activities are prohibited in the territory of the Republic of Kazakhstan;
 - whether the Counterparty / head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner is on the wanted list for corruption / economic crimes / or has an unexpunged criminal record for corruption / economic crimes;
 - whether the Counterparty / head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner is on the list of organizations / individuals in relation to which there is information about their involvement in extremist activities or terrorism;
- presence or perspective adoption of anti-bribery and corruption policies and procedures.

The Responsible Person may request additional documents during the verification process.

5.1.2. For individuals and sole proprietors, the Responsible person must collect the most available information using open sources of information (information and reference systems) and check the following:

- compliance of passport data or identity document, registration address;



- confirmation of the registration of the Counterparty as an sole proprietor and identification of the possible fact of suspension or termination of the entrepreneurial activity of such a person;
- whether the Counterparty or representatives involved in negotiation and performance of the perspective contract is a Politically Exposed Person;
- whether the Counterparty is an employee of the Partnership;
- identification of legal entities, the founder, participant and / or head of which is this Counterparty;
- verification of tax arrears and writs of execution;
- whether the Counterparty is affiliated with other Counterparties of the Partnership, having a common address, telephone number, e-mail or website;
- whether the Counterparty is associated with members of the tender commission;
- whether the Counterparty is in the following lists;
 - whether the Counterparty is in the list of debtors with overdue accounts receivable towards the Partnership or in the list of the Counterparties of the Partnership under claims procedures;
 - whether the Counterparty or representatives involved in negotiation and performance of the perspective contract is listed in the register of calls to the Hotline of the Partnership;
 - information on the presence of the Counterparty in the lists of affiliated persons of the Partners;
 - whether the Counterparty or representatives involved in negotiation and performance of the perspective contract is on the list of wanted persons for corruption / economic crimes;
 - whether the Counterparty and / or representatives involved in negotiation and performance of the perspective contract is on the list of organizations / individuals in relation to which there is information about their involvement in extremist activities or terrorism;
 - information on the presence of the Counterparty is on sanctions lists (national, international, unilateral or established by multilateral institutions sanctions lists or debarment lists of persons that are restricted or prohibited from contracting with public or government entities)
 - checking the presence of the Counterparty in the registration log and maintenance of information on Conflict of Interest in accordance with the internal documents of the Partnership on the settlement of Conflict of Interest in employees and officials;
- other negative information, such as information on any investigations, prosecutions relating to serious offenses with particular reference to offences related to corruption, money laundering, violation of human rights or fraud in relation to the Counterparty and representatives involved in negotiation and performance of the perspective contract available in open sources of information, as well as sources officially available to the Responsible Person

• presence or perspective adoption of anti-bribery and corruption policies and procedures.
The responsible person may request additional documents during the verification process.

5.2. Classification of risk levels of the Counterparties

5.2.1. All Counterparties are assigned the following risk levels by the Responsible Person during the audit:

- Green risk level;
- Orange risk level;
- Red risk level.

5.2.2. **Green** risk level is assigned to Counterparties, for which no negative information is found, as well as on the activities of the Counterparty itself and its reputation in the market. In addition:

- beneficiaries, executives are identified;
- no conflicts of interest, connections with sanctions lists, connections with Politically Exposed Persons, connections with terrorist and forbidden organizations have been revealed;
- there are no claims with the Counterparty;
- it is established that the Counterparty has no tax arrears;

5.2.3. **Orange** risk level is assigned in the following cases:

- owners and beneficiaries of the Counterparty could not be confirmed in public sources and databases;

- The Counterparty is registered shortly before the conclusion of the contract (360 days or less);
- official connections of owners, proprietors, heads of the Counterparty with politically exposed persons or they are such a person have been revealed;
- negative provable information in public sources has been found in relation to the Counterparty;
- legal proceedings related to cases of corruption, bribery, commercial bribery, etc. were initiated against the Counterparty / owners and top management;
- there is a declared conflict of interest according to the internal document of the Partnership on settlement of Conflict of Interest of employees and officials;
- there were overdue payments and outstanding receivables to the Partnership for the previous three years;
- there are doubts in the operating capacity of the Counterparty, sufficient to fulfill its contractual obligations;

5.2.4. During the inspection, the Responsible Person may identify other attributes that may classify as an **orange** risk level.

5.2.5. If the Counterparty has been assigned an **orange** risk level, interaction is possible subject to the recommendation of the administrator of the budget line.

5.2.6. **Red** risk level is assigned when any of the criteria listed below are established. Verification materials are sent to the Requestor. The First Heads / Operating Committee decides on the advisability of cooperation with this Counterparty

- Unwillingness of the Counterparty or recipients of Non-profit Initiatives to provide documents and information reasonably requested and related to (i) corporate registration documents and financial statements, (ii) personal data of the top management, key personnel, ultimate beneficiary owners, (iii) qualifications, experience and financial resources in relation to conduct the business for which it is being contracted;

- information indicating that the Counterparty or recipients of Non-profit Initiatives and their associated persons/members, top management or key personnel, when included in the scope of checks: (i) have a reputation for improper business practices or similar misconduct; (ii) have been investigated, convicted, sanctioned or debarred for bribery, corruption, fraud, money laundering, violation of human rights or similar criminal conduct; (iii) have any links with Politically Exposed Persons; (iv) named in national or international or multilateral institutions sanctions or debarment lists of persons that are restricted or prohibited from contracting with public or government entities;

- The Counterparty submitted documents with possible signs of falsification;
- an undeclared conflict of interest was found according to an internal document in the field of conflict of interest settlement among the employees of the Partnership;

- there is no record on the Resident Counterparty in the corporate register of the Republic of Kazakhstan;

- the identification number of the Counterparty in the corporate register of the Republic of Kazakhstan does not correspond to the data provided by the Counterparty;

- The Counterparty does not disclose information about its owners;
- the identification number of the owner or head of the Counterparty is invalid;

- The Counterparty, its head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, direct or indirect owner are present in the list of organizations and individuals in relation to which there is information about their involvement in extremist activities or terrorism;

- The Counterparty is in the process of liquidation or bankruptcy;
- The Counterparty is registered after the expected date of the conclusion of the contract;
- The Counterparty is listed in the register of calls to the Hotline of the Partnership;
- The Counterparty is listed for privatization;
- The Counterparty is a non-performing legal entity.

5.3. During the inspection, the Responsible person may identify other signs, which can classify as a **red** risk level.

5.4. If the Responsible Person discovers a declared / non-declared Conflict of Interest and, the Counterparty is listed for privatization or in cases where the Counterparty is listed in the register of calls to the Hotline of the Partnership, the provisions of clauses 5.10-5.13 of this Policy.

Limited verification of the Counterparty

5.5. In the casewhen the Partnership does not have the opportunity to refuse to work with the Counterparty based on the results of the tender procedures conducted in accordance with the rules, namely, conducting an open or single-source method, according to clause 4.3.3 of this Policy, the Requestor sends a request to the Responsible Person for a limited verification of the potential supplier

- in accordance with the Rules (if applicable),
- checking the presence of the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, owners of the Counterparty in the registration log and maintenance of information on Conflict of Interest in accordance with the internal documents of the Partnership on the settlement of Conflict of Interest in employees and Officials;

- information on the presence of the Counterparty / owners / head (members of the Board of Directors or equivalent body), and/or representatives involved in negotiation and performance of the perspective contract in the sanctions lists (local, international, unilateral or established by multilateral institutions sanctions lists or debarment lists of persons that are restricted or prohibited from contracting with public or government entities), the list of terrorist and extremist organizations;

- whether the head (members of the Board of Directors or equivalent body), representatives involved in negotiation and performance of the perspective contract, owners of the Counterparty is a Politically Exposed Person;

5.5.1. **For legal entities, individuals and sole proprietors**, the Responsible Person shall:

- collect data on the head (members of the Board of Directors or equivalent body), owners of the Counterparty (if possible, it is necessary to establish ownership to the individual or individuals).

If the owner of the inspected Counterparty belongs to companies with a green risk, the audit of this owner can be completed.

When a Counterparty/its owner is listed on stock markets, it will be necessary to identify owners holding at least 25% of shares in the Counterparty from Group II (a), and owners holding at least 5% of shares directly or indirectly in all other Counterparties.

5.9. If a declared / undeclared Conflict of Interest of the Partnership, the Counterparty is listed for privatization or in cases where the Counterparty is listed in the register of calls to the Hotline of the Partnership, the provisions of clauses 5.10-5.13 of this Policy.

Conflict of Interest

5.10. If an undeclared Conflict of Interest is identified, contracting with such Counterparty is prohibited until the circumstances are clarified.

5.11. If a declared Conflict of Interest and/or relationship with Politically Exposed Persons is identified, approval of further interaction with this Counterparty may only be given by First Heads / Operating Committee.

5.12. In the event of a declared/undeclared Conflict of Interest with the employees of the Partnership, who has a Conflict of Interest, must be removed from the Counterparty selection process (does not have the right to vote when choosing a Counterparty).

5.13. Further settlement of Conflict of Interest shall be carried out in accordance with the Partnership's internal document on the settlement of Conflict of Interest in employees and officials.

6. SOURCES OF INFORMATION FOR INTEGRITY CHECK OF THE COUNTERPARTY

6.1. The Responsible Person may use the following sources of information for the purpose of verifying the Counterparty:

6.1.1. automatic aggregators of information on Counterparties of the Republic of Kazakhstan, the Russian Federation, the Republic of Belarus and other CIS countries, such as Kompra.kz and Spark Interfax;

6.1.2. Databases on foreign Counterparties, such as D&B Hoovers, ICIJ Offshore Leaks Database, OpenCorporates, etc.

6.1.3 Official state corporate registers, such as the Statistics Committee of the Ministry of National Economy of Kazakhstan;

6.1.4 Portal of Automated Information System 'Information Service of the Committee for Legal Statistics and Special Accounts of the General Prosecutor's Office of the Republic of Kazakhstan';

6.1.5. World-Check database to check legal entities and individuals for links to Politically Exposed Persons, organized crime groups and other risks;

6.1.6. Available court registries;

6.1.7. Media data and other open sources of information;

6.1.8 Forums with reviews of employers / customers / partners containing possible negative information about the Counterparty;

6.1.9. Social networks to check information about key persons of the Counterparty, such as LinkedIn, Facebook, VK.kz and others.

7. RESULTS OF INTEGRITY CHECK OF THE COUNTERPARTY

7.1. Integrity check of the Counterparty is carried out using data from public external and internal sources of information, as well as on the basis of documents provided by the Counterparty, within 5 (five) working days from the date of submission of documents of the Counterparty.

7.2 Based on the results of collection and analysis of received data about the Counterparty, the Responsible person shall prepare a dossier and form a report (see Appendix No. 3) to be sent to the Requestor. The report must be accompanied by a completed Questionnaire of the Counterparty, documents received from the relevant Counterparty (see Appendices No. 1, 2).

7.3 The results of checks on the Counterparty must be stored electronically for at least three years after the end of the relationship with the Counterparty.

7.4 The results of checks of the Counterparties are not subject to full or partial transfer to the Counterparties or other third parties.

8. PERIODICITY OF INTEGRITY CHECK OF THE COUNTERPARTY

8.1. The period of validity of the check of the Counterparty with which the Partnership has entered into an agreement is two years.

8.2 Upon the expiry of the period specified in clause 8.1 of the Policy and provided the business relationship with the Counterparty is maintained, the Counterparty is checked again in accordance with the requirements of this Policy.

8.3 If it becomes known about the change of the key person and / or the owner of the Counterparty, an extraordinary inspection of the Counterparty must be carried out.



COUNTERPARTY QUESTIONNAIRE

SECTION A: General information
(to be filled in by the Counterparty)

Name of the legal entity	Business Identification Number (BIN) or other identification number (for foreign companies):
Trademark	Individual Identification Number (IIN; for individuals):
Legal address	City
	Postal code
Actual address	City
	Postal code
Country	Region / Oblast
Telephone	Fax
E-mail address	Organization's website
Date and place of registration	
Main activity	
Full name of General Director	
Full name of Chief Accountant	
Name of servicing bank (specify the bank where the account will be indicated in the details for making payments with Isatay Operating Company LLP)	



SECTION B: Ownership Structure
(to be filled in by the Counterparty)

Provide information about
shareholders and persons under
control of the company, including
ultimate beneficiaries

General Director / Management /
Board of Directors

Provide information about
subsidiaries and affiliates

SECTION B: Risk Information
(to be filled in by the Counterparty)

Outline one of the answers and provide additional information if necessary.

Is the company or company management currently under investigation for allegations of fraud, corruption, tax evasion, customs violations or economic sanctions?

NO YES. Provide additional information:

Does the company plan to use other legal entities (subcontractors), including subsidiaries, affiliates, partnerships or joint ventures, and non-employee individuals to transact with Isatay Operating Company LLP?

NO Yes. Provide the name / full name and address of the legal entity / individual, and explain the relationship of these persons to the company and what activities they perform for the company:

Do you know about the employees of Isatay Operating Company LLP who are supposed to transfer part of the funds paid by Isatay Operating Company LLP to your company? Do you know about the employees of Isatay Operating Company LLP who receive money from your company, are shareholders or work part-time in your company?

NO Yes. Provide the full name, position and type of interaction of the employee of Isatay Operating Company LLP with your company:

Does your company have any debts on taxes and other levies (including off-budget payments)?

NO YES. Provide additional information:

Have any liquidation proceedings been initiated against your company?

NO YES. Provide additional information:

Has your company ever been officially declared bankrupt?

NO YES. Provide additional information:

Have any measures of compulsory suspension of the company's activities been applied due to violation of the requirements of Kazakhstan legislation?

NO YES. Provide additional information:

General Director or other
authorized person:

Signature:

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Date:

If any of the requested information is not provided, the questionnaire will be returned for further filling.

The employee / Responsible person must attach the Counterparty questionnaire to the results of the Counterparty check. The result of the Counterparty check must be kept for at least two years after the end of the relationship with the Counterparty.



Copies of the Counterparty's documents listed below must be certified with an original seal impression and the inscription "True copy" (indicating the signature, position and full name of the Counterparty's employee who certified the copy (General Director of the legal entity or personally sole proprietor).

- 1) Completed Questionnaire of the Counterparty;
- 2) Copy of the certificate of registered legal entity, branch or representative office, indicating the founders of this legal entity, received not later than 14 calendar days before the documents request;
- 3) Copy of the certificate of participation of the legal entity (individual) in other legal entities, received not later than 14 calendar days prior to requesting the documents;
- 4) Copy of the Counterparty's tax registration certificate;
- 5) Copy of the Charter with a stamp of registration;
- 6) Extract from the decision of the Counterparty's governing body on the appointment of the General Director; internal orders related to the appointment of the General Director and the Chief Accountant; copies of powers of attorney (if applicable);
- 7) Copies of licenses and certificates in accordance with the types of activities, within which the cooperation will be carried out
- 8) Information on current legal proceedings (in which the Counterparty acts as a plaintiff, defendant or third party (if applicable)); otherwise, confirmation that the Counterparty is not involved in any legal proceedings;
- 9) A valid lease agreement or certificate of ownership for the location address (which confirms the legal address of the Counterparty);
- 10) A copy of the financial statements as of the last reporting date with the seal of the tax authority;
- 11) Notification on the Counterparty's use of the simplified taxation system, issued by the relevant tax authority (if applicable);
- 12) Information letter from the tax authority on open bank accounts.

COUNTERPARTY VERIFICATION REPORT		
Basis for the inspection (conclusion of the contract / scheduled inspection / inspection on request)		
Application number		
General information about the Counterparty		
Name		
Legal status		
Identification number		
Country		
Legal address (city, street, house / building number, office)		
Shareholders and executives (full name)		
Name of the Counterparty's bank		
Counteragent's website		
Verification results		
Assigned risk rating		
Green <input type="checkbox"/>	Orange <input type="checkbox"/>	Red <input type="checkbox"/> Limited Screening <input type="checkbox"/>
Conflict of interest (if any)		<input type="checkbox"/> Declared <input type="checkbox"/> Undeclared
The presence of the Counterparty in the list of affiliates		
Yes <input type="checkbox"/>		No <input type="checkbox"/>
The presence of the Counterparty on the list for privatization		
Yes <input type="checkbox"/>		No <input type="checkbox"/>
The presence of the Counterparty in the register of calls to the Hotline of the Partnership;		
Yes <input type="checkbox"/>		No <input type="checkbox"/>
Identified risk factors:		
Recommendations:		
Requestor:	Signature:	Date:
Legal Director:	Signature:	Date:
Responsible Person:	Signature:	Date: