

Approved by  
the decision of the Board of Directors of Air Astana JSC  
Minutes №248 dated 14 May 2024



**POLICY OF AIR ASTANA JSC FOR PREVENTION AND  
RESOLUTION OF CONFLICTS OF INTEREST**

## **Table of Content**

TERMS AND DEFINITIONS .....	3
INTRODUCTION .....	5
1. PURPOSES OF POLICY AND ITS APPLICATION .....	5
2. TYPES OF CONFLICT OF INTEREST .....	6
3. PRINCIPLES OF PREVENTING AND MANAGING CONFLICT OF INTEREST .....	7
4. REQUIREMENTS FOR DISCLOSURE OF CONFLICT OF INTEREST .....	7
5. DISCLOSURE OF CONFLICT OF INTEREST .....	8
6. AN INTERESTED PARTY TRANSACTIONS .....	8
7. REGISTRATION OF INFORMATION ON CONFLICTS OF INTEREST .....	9
8. RESOLUTION OF CONFLICTS OF INTEREST.....	10
9. MONITORING CONFLICTS OF INTEREST .....	11
10. RESPONSIBILITY .....	11
11. FINAL PROVISIONS.....	12

## TERMS AND DEFINITIONS

**Affiliates** – individuals or legal entities having the ability to influence the decisions directly and (or) indirectly, taken by each other (one of the entities), including in virtue of a deal. The list of the affiliated persons of the joint stock company is established in article 64 of The Law of the RoK «On Joint stock companies».

**Close relatives** – parents (parent), children, adoptive parents, adopted children, brothers and sisters of the full and half blood, grandfather, grandmother, grandchildren.

**Relatives in-law** – a relationship between one of the spouses towards the close relatives of the other spouse.

**Connected persons** – a scope of persons, linked by the property and personal non-property rights and obligations, emerging from marriage (matrimony), affinity, legal relation, adoption as well as friends or non-direct relatives of the Employee or Official with whom the Employee or Official has a Close Personal Relationship.

**Company** – Air Astana Joint Stock Company.

**Competitor** – an individual, individual entrepreneur or legal entity providing services or goods similar to the services (works, goods) provided or sold by the Company.

**Conflict of interest** – any situations (or circumstances) in which the personal/private interests or actions of Employees /Officials are in conflict or in potential conflict with Company interests, with an effect/ potential effect on the impartiality of performance of duties and decisions on Company matters

**Counterparty** – an individual or a legal entity with which the Company has a business relationship, (for example, an agreement on the provision of services / supply of goods, agency agreement, etc.).

**Division of the Company** – is a structural unit of the Company and the Employees related to it, who are responsible for the performance of the tasks and duties assigned to them.

**Employee** – an individual who has signed an employment contract with the Company and/or other individuals hired under an agency or other contract.

**Officials of the Company** – the Company's President and Board of Directors of JSC Air Astana.

**Insider information** – actual information about securities (derivative instruments) and relative transactions, as well as non-public information about the Company and its activity, the disclosure of which may adversely affect the Company or provide a financial advantage to the recipient of the information.

**Internal information** – information received by an Employee/Official in the course of execution of their official duties, including information for official use and commercial secret of the Company.

**Managing conflict of interests** - establishing mechanisms to avoid situations, in which personal/private interests of Employee/Official may compromise objectivity of decision-making and impartiality in performing their official duties, and cause a conflict with their duty to act in the interests of the Company.

**Personal / private interests** – a possibility of receiving by Official/Employee of an income in a type of money, values, other assets or monetizable services, other property and non-property rights for himself/herself or the third parties.

**Regulation of conflict of interests** – actions of the relevant bodies and/or individuals capable and competent to make management decisions, as the result of which adverse effects of a potential or actual conflict of interest are avoided.

**RoK** – the Republic of Kazakhstan

**Shareholder** – an individual or institution (including a corporation) that legally owns one or more

shares of stock in a public or private corporation.

## **INTRODUCTION**

According to the Code of Conduct of Air Astana JSC (hereinafter – the "Company"), Employees and Officials shall perform their duties, as well as use assets, property and resources of the Company for the benefit of the Company only.

Abuse of power and authority is unacceptable for the Company.

Absence of conflict of interests, i.e. absence of conflict of private interests with Company interests, is important for effective performance of duties and responsibilities by Employees and Officials. There shall be timely disclosure and resolution of conflicts of interests.

### **1. PURPOSES OF POLICY AND ITS APPLICATION**

- 1.1 This Policy of Air Astana JSC for the prevention and resolution of conflicts of interest (hereinafter – the "Policy") has been developed in accordance with the current legislation of RoK and the Company's Charter, Corporate Governance Code and Code of Conduct.
- 1.2 Actual and potential conflict of interest, for which appropriate measures are not taken, compromise Company reputation among Employees, Counterparties and other persons, including shareholders, government bodies, trade unions and professional associations.
- 1.3 The objective of this Policy is to ensure that Employees, Officials, Counterparties and connected persons comprehend and comply with the Company's standards on conflicts of interest by means of:
  - consolidating principles of the Company in respect of conflicts of interest and requirements for Employees and the Officials to comply with these principles and the applicable RoK legislation;
  - establishing procedures for disclosure of potential conflicts of interest and the mechanisms for managing conflicts of interest;
  - providing proper and timely communication and information to Employees and Officials about measures for identification, management and resolution of conflicts of interest.
- 1.4 This Policy is mandatory for all Employees and Officials of the Company.
- 1.5 Company standards apply to both Employees and Officials and their close relatives, relatives in-law and connected persons, if they are involved in situations with a potential conflict of interest.
- 1.6 The Company expects its Counterparties to comply with the provisions of this Policy in business dealings with and on behalf of the Company.

## 2. TYPES OF CONFLICT OF INTEREST

### 2.1 Conflicts of interest include the following:

- a) use for personal interest of insider or other internal information, which became available to Employee or Official by virtue of the official duties, for deals/transactions.
- b) combination of executive and control functions, allowing to use powers in order to obtain a personal interest, when private interests of the Employee contradict the interests of the Company and impartial and objective performance of job duties becomes impossible.
- c) use of confidential, insider or other internal information, which is not required for the performance of Employee's or Official's duties, in order to obtain personal interest.
- d) abuse of powers and authorities by an Employee or Official in order to obtain a personal interest.
- e) hiring or changing job duties of an Employee who is in close relationship with the immediate supervisor or a person performing related functions.
- f) disruption of performance of official duties by another Employee in order to obtain a personal interest.
- g) decision-making and performance of job duties by the Employee or Official with respect to relatives or relatives in-law.
- h) participation of an Employee or Official (connected persons of an Employee or Official) in the business of the Company's counterparties, implying that the Employee or Official favors the interests of one counterparty and / or his own interests to the detriment of the interests of the counterparty in order to obtain a personal interest.
- i) interests of the Company are in conflict with the interests of other legal entities, where Employee or Official of the Company is an employee/ultimate beneficiary/official. The reliability of the Employee or Official is compromised by employment with other legal entity or participation/possession of another legal entity.

### 2.2 In addition, Employees/Officials **shall not**:

- a) be involved in any situation (for example, participate in or influence, either directly or indirectly, a business decision-making, process or transaction) , in which their personal interests are in conflict with the Company interests.
- b) disclose internal or insider information of the Company to third parties.
- c) be involved in the decision-making on their own remuneration.
- d) compete with the Company. This includes, without limitation, a competition with respect to any business transactions and investment projects.
- e) participate for profit or other personal interest in a transaction, in which the Company is a party, as a result of which the Company acquires or disposes of property without prior written approval of the Board of Directors and/or the appropriate authorized body.
- f) buy or retain a personal interest in the assets of the Company or Counterparty without prior notification to and written approval of the Board of Directors and/or authorized body.
- g) be senior manager, member of the Board of Directors or a shareholder of a Counterparty or Competitor, or be a consultant, agent or other representative of such legal entity or individuals if there is a conflict of interest. This provision also applies to close relatives, unless an Employee/Official informed the Company about the potential existence of conflict of interest and the potential conflict of interest was duly resolved.

- h) purchase goods and services from former employees, who committed malpractice and misconduct.
  - i) purchase goods and services from former employees before expiry of, at least, two years after termination of employment contract.
  - j) abuse power or authority to obtain personal interest from customers, suppliers or other third parties, or other interests that may arise in connection with the Company's sales or purchase activities.
- 2.3 The examples of conflict of interests in paragraphs 2.1 and 2.2 are not exhaustive and do not cover all possible situations that may arise. If the cases of conflict of interests, which are not mentioned above in paragraphs 2.1 and 2., meet the definition of "conflict of interest":
- the relevant Employee shall be notified of the violation (without any further sanctions).
  - the Policy shall be amended accordingly.

### **3. PRINCIPLES OF PREVENTING AND MANAGING CONFLICT OF INTEREST**

- 3.1 In performance of their official duties, Employees and the Officials shall observe the Code of Conduct and internal policies of the Company, and the RoK legislation;
- 3.2 Each Employee/Official shall guarantee that their personal interests, family ties, friendships or other relationships, personal likes and dislikes do not create a conflict of interest with their official duties.
- 3.3 If a conflict of interest is unavoidable, Employee/ Officials shall disclose it in written form and obtain approval from immediate supervisor and the Compliance Manager [*other person in charge for compliance*]. In this case, the conflict of interest shall be subject for regulation in accordance with the procedures outlined in Section 8 of this Policy.
- 3.4 The Company prohibits Employees, Officials, Top Management of the Company from using their official position for personal interest to ensure that the Company participates in the procurement of goods/works/services of legal entities, in which Employees, Officials, Top Management of the Company or their close relatives, relatives in-law and connected persons are senior managers or owners.
- 3.5 The Company maintains job descriptions, regulations on the Company departments, documents regulating internal processes and procedures that ensure control of access rights and proper use of these rights by heads of departments, and prohibit incompatible functions of departments and Employees.
- 3.6 The Company monitors the use of insider and internal information available to Employees and Officials, and their relevant decisions and actions, including entering into major transactions and interested party transactions, which may cause conflict of interest.

### **4. REQUIREMENTS FOR DISCLOSURE OF CONFLICT OF INTEREST**

- 4.1 The Company encourages Employees/Officials to disclose and discuss situations of conflict of interest and guarantees protection from retaliation in connection conflict of interest, which was disclosed timely.
- 4.2 The Company additionally guarantees that the information on the disclosed conflict of interest shall be kept in confidentiality and that the resolution measures will keep balance of the interests of the parties involved.
- 4.3 Any information on actual or potential conflict of interest known to the Employee and/or Official shall be disclosed immediately to the immediate manager and/or the Compliance Manager [*other person in charge for compliance*].

- 4.4 Regardless of their position, Employees/Officials are obliged to identify potential conflicts of interests in interactions with existing and potential counterparties.
- 4.5 Employees and the Officials must not leave conflicts of interest unresolved, unless the Company has consented to keep the conflict of interest unresolved.
- 4.6 Employees and Officials of the Company shall put the interests of the Company above their private interests and be guided exclusively by Company interests in addressing business issues. Their decision-making process should not depend on religious, ethnic, political, family or the personal preferences of decision-makers. Employees should apply common sense, taking into account all the relevant requirements of this Policy.
- 4.7 The Company has the right, at its discretion, to prohibit certain conflicts of interest among its Employees, where such a conflict poses a significant risk to the Company's interests or reputation, provided that such prohibitions do not contradict RoK legislation. Employees are allowed to hold, directly or indirectly, (disclosure to the Company is not required) ownership stake in any company dealing with the Company, if such Employee and/or his/her affiliates do not influence the decision-making or own (or jointly with their affiliates) less than ten percent of voting shares in this company.

## 5. DISCLOSURE OF CONFLICT OF INTEREST

- 5.1 Employees and Officials of the Company as well as Shareholders' representative(s) must immediately disclose to the Company (immediate Supervisor or the Compliance Officer) all cases of actual or potential conflict of interest described in Section 2 of this Policy. If in doubt, Employees and Officials as well as Shareholders' representative(s) should contact the Compliance Manager [*other person in charge for compliance*] for clarification.
- 5.2 The Company establishes the following procedure for disclosing (declaring) information about potential and actual conflicts of interest:
  - initial disclosure of information on conflict of interests on employment [completion of the application form attached as **Appendix 1** to this Policy and confirmation of acknowledgment with this Policy. Actions are conducted in digital format in ELMA system];
  - disclosure of information on conflict of interests on promotion or transfer to a new role [completion of the application form attached as **Appendix 1** to this Policy. Actions are conducted in digital format in ELMA system];
  - when situations or circumstances change giving rise to new conflicts of interest [completion of the application form attached as **Appendix 1** to this Policy. Actions are conducted in digital format in ELMA system];
  - disclosure of information on conflict of interests as the part of annual tests for compliance with ethical business standards of the Company [completion of the application form attached as **Appendix 1** to this Policy. Actions are conducted in digital format in ELMA system].
  - disclosure of information about a conflict of interest by representatives of shareholders [filling in a written Application in the form of **Appendix 2** to this Policy].
- 5.3 Disclosure of conflict of interest should be carried out in written form.

## 6. AN INTERESTED PARTY TRANSACTIONS

- 6.1 Affiliated persons of the Company, and their affiliates, shall be recognized as a persons interested in entering into transaction with the Company, if they are:
  - a) a party to such transaction or participate in it as a representative or agent;
  - b) affiliates of a legal entity which is a party to this transaction or participates in it as a



representative or agent.

- 6.2 An interested parties are obliged to report:
- a) that they are party to a transaction or they participate in it as a representative or agent;
  - b) about legal entities where they hold managerial positions or may influence a decision-making;
  - c) committed or anticipated transactions, in which they may be recognized as an interested parties.
- 6.3 Procedures for entering into an interested party transactions, i.e. transactions with affiliated persons of the Company, are established by the legislation of RoK and the Company Charter.
- 6.4 Major shareholders and Officials of the Company must regularly provide the information about its affiliates to the Compliance Manager *[other person in charge for Compliance]* in the manner prescribed by RoK statutes and legislation.
- 6.5 The shareholder or several shareholders, acting on the basis of an agreement, concluded between them, that owns (own) ten or more percent of the voting shares of the joint stock company are Major shareholders.
- 6.6 The President of the Company appoints the persons in the Procurement Department responsible for checking the information against the list of affiliates of the Company received by the Compliance Manager *[other person in charge for Compliance]* from major shareholders and officers of the Company entering into contracts and transactions.
- 6.7 If the Procurement Department identifies signs of transactions with an interested parties, it should provide the Compliance Manager *[other person in charge for Compliance]* with information on these transactions, which shall be put for consideration by the Company's Board of Directors.
- 6.8 The decision on the conclusion of a transaction by a company, in which it is interested, shall be taken by a simple majority of votes of members of the board of directors who are not interested in making it, unless the standard terms of such a transaction are approved by the company's board of directors. The decision on conclusion of an interested party transaction shall be taken at the general meeting of the shareholders by a majority of votes of the shareholders that not interested in the transaction, if all the members of the board of directors of the company are the interested parties or in case of inability to take the decision on the transaction by the board of directors for the absence of the number of votes necessary for the decision making. The decision on the conclusion of a major transaction by the company in which there is an interest shall be made by the general meeting of shareholders by a simple majority of votes of the total voting shares of the company. The General Shareholders Meeting and Board of Directors should be provided with the information required to make an informed decision about the transaction.
- 6.9 In case of failure to comply with the requirements stipulated by the legislation of the Republic of Kazakhstan and the Charter of the Company, an interested party transaction will be declared as invalid by a court upon a lawsuit of interested persons. A person who is interested in commitment of transaction by the Company in violation of these requirements shall be liable to the Company in the amount of losses caused to the Company. If several persons are involved into transactions, they will be jointly and severally liable to the Company.

## **7. REGISTRATION OF INFORMATION ON CONFLICTS OF INTEREST**

- 7.1 The Compliance Manager *[other person in charge for Compliance]* is responsible for receiving information on conflicts of interest.
- 7.2 If an Employee's circumstances change and a conflict of interest no longer exists, this

change must be registered in digital form in ELMA system according to the **Appendix 1** of this Policy.

- 7.3 The Compliance Manager *[other person in charge for Compliance]* provides a report on conflicts of interest generated from ELMA system to the Audit Committee and President of the Company on a quarterly basis.
- 7.4 Internal Audit Service may request information on existing conflicts of interests, if necessary.
- 7.5 The Compliance Manager *[other person in charge for Compliance]* shall keep materials related to the disclosure, evaluation and resolution of conflicts of interest in accordance with the internal Regulation for confidential information.

## **8. RESOLUTION OF CONFLICTS OF INTEREST**

- 8.1 Employees and Officials take necessary measures to prevent conflict of interest and identify circumstances that cause a conflict of interest.
- 8.2 The Company is committed to a balanced resolution of any conflicts of interest declared by the Employees, taking into account the interests of the Company and its Employees.
- 8.3 Information about an Employee's real or potential conflict of interest should be carefully and immediately reviewed by the immediate manager and/or the Compliance Manager *[other person in charge for compliance]* in order to assess risks and to find the most appropriate solution for resolving the conflict.
- 8.4 If it is impossible to prevent conflict of interest at the level of the department, Employee's immediate manager shall inform the Compliance Manager *[other person in charge for compliance]* about the conflict of interest within one working day, including information about its causes, and measures that have been or can be taken.
- 8.5 The Compliance Manager *[other person in charge for compliance]* shall decide on procedures to resolve the conflict of interest. The Compliance Officer *[other person in charge for compliance]* may establish a working group to include representatives of the Human resources and Legal departments, as well as other involved departments.
- 8.6 The Board of Directors makes the decision on resolution of the conflict of interest of the President within three working days after receiving information on the conflict of interest.
- 8.7 The following measures for resolution of conflict of interest regulation [this list is not exhaustive and other forms of resolution may be agreed between the Company and Employee] are possible:
  - a) Following the check and other measures undertaken (see Section 8 of this Policy), the Company does not see conflict of interest in the situations (circumstances or relationships), which were reported by Employee/Officials.
  - b) Restriction of access to specific information for Employee/Officials.
  - c) Voluntary refusal by the Employee/Officials (or their permanent or temporary suspension) from participation in discussions and decision-making process on issues that are or may be a conflicts of interest.
  - d) Review or change of the duties of an Employee/Official.
  - e) Re-election of an Official or transfer of an Employee (with his consent) to another role, which does not cause conflict of interest in accordance with the legislation of the RoK.
  - f) Refusal of private interests, which cause conflict with the interests of the Company.
  - g) Voluntary resignation of Employee in accordance with RoK legislation.
  - h) Termination of employment contract for misconduct where legally permitted and in

order established by RoK legislation.

## **9. MONITORING CONFLICTS OF INTEREST**

- 9.1 The Compliance Manager *[other person in charge for compliance]* shall be responsible for monitoring and managing potential conflicts of interests.
- 9.2 The Compliance Manager *[other person in charge for compliance]* may have the following checks of conflict of interest:
- a) Analysis and evaluation of results of verification activities stipulated by the internal procedures of the Company;
  - b) Examination of documents and information on procurement activities to identify signs of conflict of interest, as set out by internal procedures of the Company, including those governing the procurement activities of the Company;
  - c) Verify information about the ownership chain of potential contractors and counterparties to the Company, including information about the ultimate beneficial owners as set out by internal procedures of the Company, including those related to the procurement and contracting activities of the Company;
  - d) Verify information about income, property and obligations of the Employees and Officials and members of their families, as set out by the internal policies of the Company and applicable Law;
  - e) Verify details of the information in the conflict of interest statements, as set out in this Policy;
  - f) regular monitoring of mass media and other information sources, with timely response to each fact of negative information about the Company;
  - g) Other methods provisioned for by internal documents of the Company that do not contradict RoK legislation.
- 9.3 The Compliance Manager *[other person in charge for compliance]* should monitor and manage potential conflicts of interests of the Officials of the Company, including the improper use of the Company's assets and abuses related to transactions with related parties, with further reporting to the Audit Committee. Managing and resolving conflict of interests shall be performed in accordance with Section 8 of this Policy.

## **10. RESPONSIBILITY**

- 10.1 The Compliance Manager *[other person in charge for compliance]* is responsible for implementation of this Policy, as well as for advisory assistance to the Officials, Employees and counterparties.
- 10.2 Each Employee, regardless of position, has the responsibility to comply with the requirements of this Policy.
- 10.3 Employees and Officials are responsible for the timely identification and declaration of personal conflicts of interest and active participation in resolving actual or potential conflicts of interest.
- 10.4 Concealment, deliberate delay in disclosure or incomplete disclosure of a conflict of interest is an abuse of trust and deception of the Company. Failure to comply with this Policy may be treated as a disciplinary offence and result in a disciplinary action against an Employee.
- 10.5 Employees and Officials are responsible for managing their personal/ private issues to avoid conflicts of interest, to the maximum extent possible.
- 10.6 Employees and Officials must always act in such a way as to serve as an example of integrity, ethical behavior for others and foster implementation of this Policy.

- 10.7 Employees and Officials are required to mitigate any consequences of a conflict of interest, including, if applicable, minimization of Company losses or damages.
- 10.8 The Company systematically tests its Employees and Officials on the awareness and compliance of their actions with this Policy and business ethics standards of the Company.
- 10.9 The Company guarantees a protection against disciplinary actions and other adverse effects in connection with implementation of the provisions herein, and reporting potential or actual violations of this Policy.

## **11. FINAL PROVISIONS**

- 11.1 This Policy comes into force upon approval by the Board of Directors and may be supplemented and amended by a decision of the Board of Directors.
- 11.2 If, as a result of changes to RoK legislation, certain provisions of this Policy contradict the applicable legislation, the relevant clauses of this Policy are repealed and until the Policy is amended accordingly, the applicable legislation will prevail.

**Declaration of absence/presence of a conflict of interest**

**When filling out the Declaration, please reflect the information reliably known to you.**

1. Do you and/or your relatives own securities issued by legal entities that are, or intend to become, Counterparties or Competitors of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Name of the legal entity	BIN of the legal entity	Name of nominal holder / owner	Type of securities	Issuer	Quantity (pcs.)

2. Are you or your close relatives, relatives in-law directors and/or owners of legal entities that are, or intend to become, Counterparties or Competitors of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Name of the legal entity	BIN of the legal entity	Participation amount	Participation currency

3. Are you, or your close relatives, relatives in-law members of the management bodies or executive bodies (supervisory boards, board of directors, other management bodies, a collegial body or a person solely performing the functions of an executive body) of legal entities that are, or intend to become, Counterparties or Competitors of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Name of the legal entity	BIN of the legal entity	Name of governing body	Date of joining the governing body

4. Do you, or your close relatives, relatives in-law carry out activities (including unpaid and regular paid work) in legal entities that are, or intend to become, Counterparties or Competitors of the

Company, or are connected in any other way with the activities of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Name of the legal entity	BIN of the legal entity	Type of paid/unpaid activity	Payment type

5. Have you used or do you use insider, confidential, or other non-public information including personal data of passengers and/or employees that became available to you as part of your official duties in order to carry out deals and/or transactions?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Name of inside information	Usage details

6. Have you combined or do you combine executive and control functions in the Company, that give rise to a potential conflict of interest affecting the objective and impartial performance of your job duties

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Description of combined executive and control functions

7. Have you used, or do you use your official authorities and position in the Company for personal interest, that are contrary to the interests of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

№	Description of the personal interest received

8. Do you have employees in direct or indirect subordination whom are you in close relations with or who are your relatives? Have you or those under your command been involved in hiring employees whom are you in close relations with or who are your relatives? Also, have you made changes to the job responsibilities of such employees of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

№	List of employees	Description of the conflict of interest (direct or indirect subordination, hiring, changing job responsibilities)

9. Have you interfered or do you interfere in the performance of the official duties of another employee of the Company in order to obtain personal interest?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

№	Description of intervention to obtain personal interest

10. Have you been or are you being involved in any situation in which your personal interests conflicted or conflict with the interests of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Description of the situation conflicting to interests of the Company

11. Have you disclosed or do you disclose confidential, insider or other internal information of the Company to third parties?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Description of information disclosed	Name of third parties

12. Have you been or are you involved in the decision-making process regarding your own remuneration in the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Description of the event

13. Have you participated or do you participate in deal(s) for the purpose of obtaining profit or other personal benefit, in which the Company is one of the parties, as a result of which the Company acquires or disposes of property, without the prior written consent/approval of the Board of Directors and/or the relevant authorized body?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

No	Description of the event

14. Have you bought or do you buy goods and services for the Company from a former employee of the Company who abused his position and violated the principles of the code of conduct?



Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

<b>No</b>	<b>Name of employee</b>	<b>Description of position abuse and/or violation of the principles of the code of conduct</b>	<b>Description of purchased goods and/or services</b>	<b>Amount of purchase</b>

15. Have you purchased or do you purchase goods and services for the Company from a former employee of the Company before the expiration of at least two years after the termination of the employment contract with such employee?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

<b>No</b>	<b>Description of the event</b>

16. Have you used or do you use your authority or position to obtain personal benefit from customers, suppliers or other third parties, as well as profit that may arise in the course of the Company's activities related to the sale or purchase?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

<b>No</b>	<b>Description of the event</b>

17. Have there been or are there any cases in which you performed or are performing your official duties not in accordance with the provisions of the Code of Conduct and other internal documents of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

<b>No</b>	<b>Description of the event</b>

18. Are you aware of any other situations (or circumstances) where your personal/private interests or actions came into conflict or created potential conflict of interest or were in conflict with the interests of the Company?

Yes  No

*If "Yes" is selected, below table need to be fulfilled:*

№	Description of the event

*[After answering all above questions in ELMA system, the employee must check the boxes, according to the text below and sign the current declaration with digital signature]*

*[A positive answer to any of the above questions does not automatically indicate a conflict of interest. The decision on the presence or absence of a conflict of interests is made based on the results of consideration of the completed Declaration by the Compliance Manager of the Company]*

I hereby confirm full responsibility for the accuracy of the information provided during filling out of this Declaration.

I will inform the Company in a timely manner in the event of a potential or actual conflict of interests, as well as in case of changes in the data specified in this declaration.

I hereby give consent and authorize the Compliance Manager of the Company (or other person responsible for compliance) to:

- carry out verification in relation to the provided above information, including verification of publicly available information (from open sources);
- undertake all steps necessary for further investigation and resolution of any conflict of interests or a potential conflict of interest, including the transfer of such issue(s) to the Company's bodies in accordance with their competence and authority.

to the Policy of Air Astana JSC for the prevention and resolution of conflicts of interests

**Air Astana JSC (Company)**

**DECLARATION AND UNDERTAKING OF A SHAREHOLDER'S REPRESENTATIVE**

« \_\_\_\_ » \_\_\_\_\_ 20 \_\_\_\_.

\_\_\_\_\_

(city)

I hereby confirm declare and undertake that I did not, do not and will not use insider, confidential or other internal information in relation to the Company, which became available to me in the course of representation of a shareholder, against the interest of the Company.

In the event of a breach of this declaration and undertaking, I will immediately notify the Company.

*Full name, position of declarant* \_\_\_\_\_

Signature: \_\_\_\_\_

Compliance Officer ("Reviewed")<sup>1</sup>:

\_\_\_\_\_

(Full name; signature)

\_\_\_\_\_  
<sup>1</sup> Coordination of the provided information with the Compliance Officer is necessary in all cases