
 air astana	Policy for prevention and resolution of Conflicts of interest	
	Unit	Compliance Service
	Reference No.	KC-CMPL-CoI_v4
	Effective date:	10/09/2024
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Air Astana JSC

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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 Republic of Kazakhstan 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, connected 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 of the Company with whom the Employee or Official of the Company has close personal relationship.

Company – Air Astana Joint Stock Company.

Competitor – for the purpose of this Policy, a legal entity providing services (works, selling goods) similar to the services (works, goods) provided or sold by the Company, including but not limited to provision of passenger and cargo air transportation services by civil aviation aircraft.

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 whom the Company has or plan to have a business relationship (for example, 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 performance of tasks and duties assigned to them.

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


Officials of the Company – the Company’s Chief Executive Officer and/or members of the Board of Directors of Air Astana JSC.

Officials – member/s of the executive body and/or members of the Board of Directors/Supervisory Board of the legal entity.

Insider information – reliable information about the Company's securities (derivative financial instruments), transactions with them, as well as about the Company and its activities, which constitutes a commercial secret, as well as other information not known to third parties, the disclosure of which may affect the change in the value of securities (derivative financial instruments) and the Company's activities.

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.

Major shareholder - a shareholder or several shareholders acting on the basis of agreement concluded between them, who (in aggregate) own 10 (ten) per cent or more of the voting shares of the joint stock company.

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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 interest – 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.

Shareholder – an individual or legal entity who owns share/s.

INTRODUCTION


According to the Code of Conduct of Air Astana JSC (hereinafter – the Company), Employees and Officials of the Company 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 by Employees and Officials of the Company is unacceptable for the Company.

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

1. PURPOSES OF POLICY AND ITS APPLICATION

- 1.1 This Air Astana JSC Policy for the prevention and resolution of conflicts of interest (hereinafter – the "Policy") has been developed in accordance with the current legislation of the Republic of Kazakhstan and the Company’s Charter, Corporate Governance Code and the 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, investors, government bodies, trade unions and professional associations.
- 1.3 The objective of this Policy is to ensure that Employees, Officials of the Company, 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 the Conflicts of interest and requirements for Employees and the Officials to comply with these principles and the applicable legislation of the Republic of Kazakhstan;
 - establishing procedures for disclosure of potential Conflicts of interest and the mechanisms for managing Conflicts of interest;

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- providing proper and timely communication and information to Employees and Officials of the Company about measures for identification, management and resolution of the 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 of the Company and their Close relatives, Relatives in-law and Connected persons, if they are involved in situations related to the 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 of the Company by virtue of the official duties, for deals/transactions.
- b) combination of executive and control functions, allowing to use powers in order to obtain 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 Officials of the Company duties, in order to obtain Personal interest.
- d) abuse of powers and authorities by an Employee or Official of the Company in order to obtain a Personal interest.
- e) hiring or changing job duties of an Employee who is Close relative or Connected person 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 of the Company with respect to Close relative or Connected person.
- h) participation of an Employee or Official of the Company (Close relative and/or Connected person of an Employee or Official of the Company) in the business of the Company's Counterparties, implying that the Employee or Official of the Company favor the interests of particular Counterparty and / or his/her 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, when the reliability of the Employee or Official of the Company is compromised by employment with other legal entity or participation/possession of another legal entity;
- j) change in the family status of the Employee or Official of the Company resulting in the emergence of family ties that create or may create a Conflict of Interest.

2.2 In addition, Employees/Officials of the Company **shall not**:

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- 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 interest are in conflict with the Company interests.
 - b) disclose Internal or Insider information 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 property without prior approval as required by the legislation of the Republic of Kazakhstan and internal documents of the Company¹.
 - f) be senior manager, Official or a Major shareholder/participant of a Counterparty and/or Competitor, or be a consultant, agent or other representative of such legal entity or individual if there is a Conflict of interest. This provision also applies to Close relatives and Connected persons, unless an Employee/Official of the Company informed the Company about the potential existence of Conflict of interest and the potential Conflict of interest was duly resolved.
 - g) 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 in course of Company's operational activities. If the cases of conflict of interests, which aren't mentioned above in paragraphs 2.1 and 2.2, 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 of the Company shall observe the Code of Conduct and internal documents of the Company, and the legislation of the Republic of Kazakhstan;
- 3.2 Each Employee/Official of the Company 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/ Official of the Company shall disclose it in written form and acknowledge it with immediate supervisor and the Head of Compliance Service. In this case,

¹ For the purpose of this Policy, the following cases shall be excluded from prohibitions set forth in Section 2.2 hereto: 1) conclusion of labour contracts between the Company and the Employee in compliance with the requirements of the Charter and legislation of the Republic of Kazakhstan; 2) purchase by the Employee of commercial and preferential air tickets of the Company.


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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 of the Company to use their official position for Personal interest in order to ensure that the Company participates in the procurement of goods/works/services from legal entities, in which Employees, Officials of the Company or their Close relatives, Relatives in-law or Connected persons are Officials or owners.
- 3.5 The Company maintains job descriptions, regulations on Divisions of the Company, 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 its Employees.
- 3.6 The Company monitors the use of Insider and Internal information available to Employees and Officials of the Company, as well as 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 of the Company to disclose and discuss situations of Conflict of interest and guarantees protection from retaliation in connection with the 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 between the Company and parties involved.
- 4.3 Any information on actual or potential Conflict of interest known to the Employee and/or Official of the Company shall be disclosed immediately to the immediate manager and/or the Head of Compliance Service.
- 4.4 Regardless of their position, Employee/Official of the Company are obliged to identify potential Conflicts of interests in interactions with existing Counterparties as well as before launching new business relations with potential Counterparties and acting solely in the interests of the Company.
- 4.5 Employees and the Officials of the Company must not leave Conflicts of interest unresolved, unless the Company (its duly authorized representative or body) 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. Not all personal interests, relationships, influences or actions automatically create a Conflict of Interest. Employees and Officials of the Company 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 legislation of the Republic of Kazakhstan. Employees are allowed to own, hold, dispose directly or indirectly, (and disclosure to the Company is not required)

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ownership stake in any company dealing with the Company, if such Employee and/or his/her Close relatives do not influence the decision-making or own (or jointly with their Affiliates) less than 10 (ten) percent of voting shares, stakes in such company.

5. DISCLOSURE OF CONFLICT OF INTEREST

- 5.1 Employees and Officials of the Company must immediately disclose to the Company (immediate supervisor or the Head of Compliance Service) all cases of actual or potential Conflict of interest described in Section 2 of this Policy. If in doubt, Employees and Officials of the Company should contact the Head of Compliance Service [*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 by all Employees. Actions are conducted in digital format in ELMA system].
- 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.

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- 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 the Republic of Kazakhstan and the Company’s Charter.
- 6.4 Major shareholders and Officials of the Company must regularly provide information about their affiliates to the Head of Compliance Service *[other person in charge for Compliance]* in the manner prescribed by the legislation of the Republic of Kazakhstan and the Company’s Charter.
- 6.5 The Chief Executive Officer 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 Head of Compliance Service *[other person in charge for Compliance]* from major shareholders and Officials of the Company for the purpose of entering into contracts and transactions.
- 6.6 If the Procurement Department identifies signs of transactions with an interested party, it shall provide the Head of Compliance Service *[other person in charge for Compliance]* with information on these transactions, which shall be put for consideration by the Company’s Board of Directors in compliance with requirements of the legislation of the Republic of Kazakhstan and the Company’s Charter.
- 6.7 Unless otherwise provided by the Company’s Charter, the decision on conclusion by the Company of the interested party transaction, shall be taken by a simple majority of votes of members of the Board of Directors of the Company who are not interested in transaction, unless the standard terms of such transaction are approved by the Company’s Board of Directors. The decision on conclusion of an interested party transaction shall be taken by the General Meeting of the Shareholders by a majority of votes of the shareholders that are not interested in such 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 required to adopt the decision. The decision on conclusion of a major transaction by the Company in which there is an interest shall be made by the General Meeting of Shareholders by simple majority of votes of the total voting shares of the Company. The General Meeting of Shareholders and the Board of Directors of the Company should be provided with the information required to make informed decision about the transaction.
- 6.8 In case of failure to comply with requirements stipulated by the legislation of the Republic of Kazakhstan and the Charter of the Company, an interested party transaction might be declared as invalid by a court upon a lawsuit of interested persons in accordance with the procedure and on the grounds established by the legislation of the Republic of Kazakhstan. A person interested in the Company making a transaction that was made in contravention of the requirements relating to the procedure for its execution and the principles of the affairs of the Officials as provided by the legislation of the Republic of Kazakhstan and Company’s Charter shall be liable to the Company for damages caused to the Company by such party. If transaction is entered into by several persons, their liability to the Company shall be joint and several.

7. REGISTRATION OF INFORMATION ON CONFLICTS OF INTEREST

- 7.1 The Head of Compliance Service *[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


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

- 7.3 The Head of Compliance Service *[other person in charge for Compliance]* provides a report on Conflicts of interest generated from ELMA system to the Audit Committee and the Chief Executive Officer of the Company on a quarterly basis.
- 7.4 Internal Audit Service may request from the Head of Compliance Service information on existing Conflicts of interests (or absence of Conflict of interests), if such need arises in the course of the audit.
- 7.5 The Compliance Service *[other person in charge for Compliance]* shall keep materials related to the disclosure, evaluation and resolution of Conflicts of interests in accordance with Company's requirements for storage of confidential information.

8. RESOLUTION OF CONFLICTS OF INTEREST


- 8.1 Employees and Officials of the Company 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 Head of Compliance Service *[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 Service *[other person in charge for compliance]* about the Conflict of interest within 1 (one) working day, including information about its causes, and measures that have been or can be taken.
- 8.5 The Head of Compliance Service *[other person in charge for compliance]* shall decide on procedures to resolve the Conflict of interest. The Head of Compliance Service *[other person in charge for compliance]* may establish a working group to include representatives of the Human resources and Legal departments, as well as well as the unit in which the person with a Conflict of interest works.
- 8.6 The Board of Directors makes decision on resolution of the Conflict of interest of the Chief Executive Officer within 3 (three) working days after receiving information on the Conflict of interest.
- 8.7 The following measures for resolution of Conflict of interest are possible [this list is not exhaustive and other forms of resolution may be agreed between the Company and Employee who disclosed information about Conflict of interest]:
 - a) following the check and other measures undertaken (see Section 8 of this Policy), the Company do not confirm Conflict of interest in the situations (circumstances or relationships), which, in the opinion of the Employee/Official of the Company who declared them, create or may create a Conflict with the interests of the Company;
 - b) restricting access of an Employee/Official of the Company to specific information of the Company that may be relevant to the Private interests of Employee/Official of the Company;.

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- c) voluntary refusal by the Employee/Official of the Company (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 the Employee;
- e) re-election of the Official of the Company or transfer of the Employee (with his/her consent) to another role, which do not cause Conflict of interest and in accordance with the legislation of the Republic of Kazakhstan;
- f) refusal of private interests, which cause conflict with the interests of the Company;
- g) voluntary resignation of Employee in accordance with the legislation of the Republic of Kazakhstan;
- h) termination of employment contract on Company's initiative for disciplinary offences if there are legal grounds for it and in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

9. MONITORING CONFLICTS OF INTEREST

- 9.1 The Compliance Service shall be responsible for monitoring and managing potential Conflicts of interests at the level of Company's Employees.
- 9.2 The Compliance Service may have the following checks of Conflict of interest:
 - a) analysis and evaluation of results of verification activities stipulated by the internal documents of the Company;
 - b) examination of documents and information on procurement activities to identify signs of Conflict of interest, as set out by internal documents of the Company, including those governing the procurement activities of the Company;
 - c) verify information about the ownership chain of Contractors, including information about the ultimate beneficial owners as set out by internal documents of the Company, including those related to the procurement and contracting activities of the Company;
 - d) verify information about income, property and obligations of Officials of the Company, Employees and their Close relatives, as set out by the internal documents of the Company and legislation of the Republic of Kazakhstan;
 - 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 the legislation of the Republic of Kazakhstan.
- 9.3 The Compliance Service shall 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 of the Board of Directors of the Company. Managing and resolving Conflict of interests shall be performed in accordance with Section 8 of this Policy.


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10. RESPONSIBILITY

- 10.1 The Head of Compliance Service is responsible for implementation of this Policy, as well as for advisory assistance to the Employees and Officials of the Company.
- 10.2 Each Employee, regardless of position, has the responsibility to comply with the requirements of this Policy.
- 10.3 Employees and Officials of the Company are responsible for the timely identification of conflicts between their personal interests and the interests of the Company, timely declaration of Conflict of interest as well as 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, imposed in accordance with the legislation of the Republic of Kazakhstan.
- 10.5 Employees and Officials of the Company have full responsibility for dealing with matters relating to their Private interests in such a way as to avoid, as far as possible, Conflicts of Interest arising from their appointment or subsequent tenure.
- 10.6 Employees and Officials of the Company 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 of the Company 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 of the Company on the awareness and compliance of their actions with this Policy and business ethics standards of the Company.
- 10.9 The Company guarantees that no Employee will be held liable by the Company or suffer any other unfavorable consequences on the Company's initiative in connection with compliance with the requirements of this Policy or reporting to the Company potential or existing violations of this Policy.
- 10.10 This Policy shall be reviewed at least every 2 (two) years.

11. FINAL PROVISIONS

- 11.1 This Policy comes into force upon approval by the Board of Directors of the Company and may be supplemented and amended by a decision of the Board of Directors of the Company.
- 11.2 If, as a result of changes to the legislation of the Republic of Kazakhstan, certain provisions of this Policy contradict the current legislation of the Republic of Kazakhstan, the relevant clauses of this Policy are repealed and until the Policy is amended accordingly, it is necessary to be guided by the current legislation of the Republic of Kazakhstan.

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APPENDIX 1

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

**DECLARATION OF ABSENCE/PRESENCE OF A
CONFLICT OF INTEREST**

When completing the Declaration, you should reflect the information that you know to be true and taking into account the terms and definitions used in Air Astana JSC Policy for prevention and resolution of conflict of interest.

1. Are you and/or your **Close relatives** and/or **Connected persons** own 10 (ten) or more percent of shares (ownership interest) in 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:

№	Name of the legal entity	BIN of the legal entity	Full name of shareholder/interest owner	Amount of shares/ interest, %	Type of activity of the Counterparty or Competitor	Information on family/other relationship


2. Are you, or your **Close relatives** and/or your **Connected persons** members of the management bodies or executive bodies (supervisory boards, board of directors, a collegial executive 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:

№	Name of the legal entity	BIN of the legal entity	Name of governing body/executive body	Date of joining the governing body/executive body	Information on family/other relationship

3. Do you, or your **Close relatives** and/or your **Connected persons** 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?

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Yes No

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

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

4. Have you used or do you use **Insider information** and/or, personal data of passengers and/or Employees of the Company or other **Internal information** that became available to you as part of your official duties for the purpose of executing deals and/or carrying out transactions for your personal benefit?

Yes No

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

№	Name of inside information	Usage details

5. 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:

№	Description of combined executive and control functions

6. 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:

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№	Description of the Personal interest received

7. Do you have Employees in direct or indirect subordination who are your **Close relatives** and/or **Connected persons**? Have you or those under your command been involved in hiring employees who are your **Close relatives** or/and your **Connected persons**? 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)

8. 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:


№	Description of the situation conflicting to interests of the Company

9. 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:

№	Description of information disclosed	Name of third parties

	Policy for prevention and resolution of Conflicts of interest	
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10. Have you used or do you use your authority or position to obtain **Personal interest** 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 of goods, works and services?

Yes No

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

№	Description of the event

11. 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:

№	Description of the event

12. Do your **Close relatives** and/or your **Connected persons** work for the Company?

Yes No


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

№	List of Employees	Description of family or other connection

13. 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:

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№	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 Service 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 Head of Compliance Service 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 mentioned above, including the transfer of such issue(s) to the Company's bodies in accordance with their competence and authority.

	Policy for prevention and resolution of Conflicts of interest	
	Unit	Compliance Service
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Document History		
Revision Number	Change made (Section Number and Name Only)	Effective date
1	Issued new policy	05/09/2019
2	5. Disclosure of conflict of interest; 7. Registration of information on conflicts of interest; Appendix 1. Declaration of absence/presence of a conflict of interest – combined Appendices 1 and 2; Appendices 4,5 and 6 removed.	29/11/2022
3	Terms and definitions; 6. An interested party transactions; Appendix 1. Declaration of absence/presence of a conflict of interest.	14/05/2024
4	Terms and definitions; 2. Types of conflict of interest; 6. An interested party transactions; 10. Responsibility; Appendix 1. Declaration of absence/presence of a conflict of interest.	10/09/2024