

**Addendum to the Policy of Proactive Informing of Samruk-Energy JSC
approved by the decision of the Board of Directors of Samruk-Energy JSC
No. 06/18 dated June 29, 2018**

To introduce the following addition to the Policy of Initiative Informing of Samruk-Energy JSC approved by the decision of the Board of Directors of Samruk-Energy JSC dated June 29, 2018 No. 06/18:

to be supplemented with clause 18 as follows:

"18.

In case when as a result of preliminary verification of arguments on received complaints/appeals against the Company's employees there are signs of criminal or administrative offense, the materials of verification shall be sent to the first manager of the Company to make a decision on further forwarding the materials to the authorized law enforcement bodies in accordance with the competence in accordance with the requirements of the legislation;

in case when as a result of preliminary verification of arguments on received complaints/appeals against the first manager of the Company there are signs of a criminal or administrative offense, the materials of verification shall be sent to the security divisions and Compliance Service of Samruk-Kazyna JSC for consideration of the issue of forwarding the materials to the authorized law enforcement authorities in accordance with the requirements of the legislation."

Approved with
the decision of Board of Directors
of Samruk-Energy JSC
dated June 29, 2018
Minutes No. 06/18

Seal:/Republic of Kazakhstan, Astana, Samruk-
Energy JSC, Board of Directors/

CORPORATE MANAGEMENT SYSTEM

**Policy of proactive informing
Samruk-Energy JSC
P 01-01-18**

Astana 2018

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1. Purpose

1. Samruk-Energy JSC (hereinafter referred to as the "Company" or "we") is committed to the best standards of corporate governance, transparency and accountability. We always conduct our business based on our values, principles and standards of behavior adopted in the Company's Code of Conduct, and we have zero tolerance for bribery and corruption.

2. We have implemented and adopted this Proactive Whistleblowing Policy (the "Policy") to manage risks with respect to violations of principles and standards of conduct and to comply with the requirements of the laws of the Republic of Kazakhstan and the OECD Anti-Corruption and Bribery Guidelines (the "Anti-Corruption and Bribery Requirement").

2. Scope

3. The Policy provides guidance to the Company's employees and other associated persons on how they can raise concerns about violations committed or in progress at the Company with the relevant persons.

The following are examples:

Bribery and corruption:

Illegal remuneration
 Fraud
 Collusion
 Coercion
 Abuse of authority

Unequal terms and conditions of employment and labor:

Labor disputes
 Discrimination
 Labor conflicts
 Harassment
 Unethical behavior

Accounting misconduct:

Accounting mistakes
 Accounting misstatements
 Financial omissions
 Falsification of records and documents

Threats to health, safety and the environment:

Environmental damage
 Property damage
 Unsafe working conditions
 Theft
 Harm to health

Information Leakage:

Unauthorized disclosure of confidential and insider information

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4. The Policy applies to all legal entities, more than 50% of the voting shares of which are directly or indirectly owned by Samruk-Energy JSC by right of ownership or trust management.

3. Definitions and abbreviations

5) The following definitions and abbreviations shall be applied in this Policy:

6) Associated Persons - members of the Board of Directors, members of the Management Board, employees, agents, joint venture partners, subsidiaries and other persons rendering services for the Company or acting on its behalf.

7) Authorized Persons - officers of the Company.

8) Hotline - a feedback tool for any associates and employees of the Company, maintained by an independent company that guarantees confidentiality.

4. Responsibility

5. The Head of Compliance Service of Samruk-Energy JSC shall be responsible for organization of functioning and compliance with the requirements established by this Policy.

7. All employees of the Company shall be familiarized with and shall be responsible for proper fulfillment of norms and provisions of this internal regulatory document.

5. Regulatory References

8. These Rules are developed in accordance with the provisions of the current legislation of the Republic of Kazakhstan, the Policy of proactive informing of Samruk-Kazyna JSC, including taking into account the following internal regulatory documents of the Company:

1) Charter of the Company;

2) Corporate Governance Code;

3) Information Policy;

4) Reference model on compliance function for portfolio companies of Samruk-Kazyna JSC.

6. Expression of concern

9. Any violation, in particular non-compliance with the Code of Conduct, could materially damage the operations and reputation of our Fund. We therefore require our employees and encourage our other associates to raise concerns about non-compliance with the Code of Conduct, anti-corruption, anti-fraud and bribery requirements and other violations.

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Any employee or other associated person who has a credible concern about matters covered in the above Policy areas should report such concerns as soon as reasonably practicable. In doing so, it is important to ensure that such concerns are raised in good faith, truthfully and without malice. However, the employee or other associated person is not expected to investigate the matter.

Generally, the first to become aware of suspected wrongdoing are the Company's employees. However, many employees may feel that raising concerns about violations to a unit manager or Company management is inappropriate for various reasons, employees may feel that the matter of concern is not significant enough, or that an employee's expression of concern would be viewed as disloyal to the Company, or that it would be easier to ignore the matter. In this regard, the Company will provide employees or other associates who disclose misconduct with protection from harassment, including job retention.

10. The Company recognizes that it is important to build confidence in the proactive whistleblowing line so that employees and other associates can be assured that their reports will be properly considered and appropriate responses will be made. In this regard, the Company engages an external operator to provide an opportunity for employees and other associated persons to express their concerns to an independent third party, including on a confidential or indeed anonymous basis. Such reports may be made 24 hours a day, 7 days a week in one or more of the following ways:

TOLL-FREE TELEPHONE LINE	External operator data is reported on a regular basis via: Company's website Compliance trainings Office posters Corporate mail other
E-MAIL	
INTERNET	
These means of communication are secure and protected by special encryption devices	

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11. In addition to the proactive reporting line administered externally, the Company provides several internal channels for raising concerns:

Business Unit Managers

In this case, the communication may be made in person or in writing. If the matter is raised in writing, it is preferable to provide a background and chronology of the issue at hand and clearly state the reasons for the concern.

If the unit manager is unable to address the issue, the matter should be reported verbally or in writing to management.

The Company does not consider reports of facts that could result in criminal liability. A person who has expressed a credible concern must be informed of the need to contact the authorized state authorities. If it is not possible to inform the person about the need to contact the authorized state bodies, the Authorized Persons shall pass the information to the Company's Security Service for further consideration and transfer to the authorized state bodies.

Management

If the matter in question relates to a unit manager, or if it is preferable not to discuss the matter with the unit manager, the employee or other associated person may communicate his or her concerns to Company management. In doing so, it is also preferable that the matter and the reasons for the concern are clearly stated in writing.

Chief Compliance Officer

In addition to reporting to department heads or management, or if it is preferable not to discuss with them, proactive reports may be made to the Head of Compliance.

Head of IAS

If the matter under discussion relates to possible financial reporting discrepancies, employees and other associates should report the matter orally or in writing to the Head of EAS.

Ombudsman

If the matter under discussion relates to any labor conflict or co-worker relationship, employees should report it orally or in writing to the Ombudsman.

7. Safeguards against harassment

Employees and other associates who report violations under this Policy will not be subjected to any adverse treatment or penalized in any way. Employees shall be afforded full protection of rights and interests, including retention of employment. However, employees who act in bad faith or make allegations for personal gain and/or with malicious intent may be subject to disciplinary action.

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12. For cases where employees and other associated persons choose an external operator to raise his/her concerns and wish to remain anonymous, the Company's engagement of an independent external operator ensures that the identity of the person raising the concern cannot be ascertained.

8. Response measures

13. External Operator:

Receives and processes all incoming reports via telephone, website or e-mail;
 Communicates with individuals expressing concerns where possible and facilitates the provision of the most relevant information possible;
 Classifies all reports and forwards them to individuals who are investigating the violations;
 Prepares reports on referrals received for subsequent submission to the Board/Board Audit Committee.

14. Department heads and management

Receive reports of potential violations;
 Ensure their employees are aware of this Policy and established procedure;
 Encourage an open work environment for personnel who can easily raise concerns;
 Handle each matter referred under this Policy appropriately;
 Consider providing guidance to the person raising the concern or deal with the matter personally;
 Consider the need for an investigation;
 Resolve the concern if possible;
 If the matter cannot be resolved, refer the matter to the Head of Compliance.

15. Head of IAS, Ombudsman

Receives reports of possible violations;
 Handles each matter referred under this Policy appropriately;
 Consider making recommendations to the person who raised the concern or who is dealing with the matter personally;

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Resolves the concern if possible;

If the concern cannot be resolved, refers the matter to the Chief Compliance Officer.

16. Head of the Compliance Service

Receives reports of possible violations;

Determines how an investigation should be conducted, if necessary;

Informs the person who raised the concern on a regular basis of the progress of the investigation;

Collaborate with business unit heads and management to form ad hoc investigation committees, as appropriate;

Authorized to inform the Audit Committee of the Board of Directors of allegations received;

Provides semi-annual reports to the Board/Board Audit Committee indicating the number of violations received under this Policy, with a brief description and outcome for each matter.

17. The Audit Committee of the Board of Directors

Receives reports of potential violations;

Oversees the most significant investigations, as appropriate;

Recommends corrective actions to the Board of Directors, as appropriate;

Reviews investigation management reports on a semi-annual basis

18. In the event that as a result of preliminary verification of the arguments on the received complaints/reports against the Company's employees there are signs of criminal or administrative offense, the materials of the verification shall be forwarded to the Company's first manager for decision on further forwarding the materials to the authorized law enforcement authorities according to the competence in accordance with the requirements of the legislation;

In case when as a result of preliminary verification of arguments on received complaints/appeals against the first manager of the Company there are signs of criminal or administrative offense, the materials of verification shall be sent to the security divisions and Compliance Service of Samruk-Kazyna JSC for consideration of the issue of forwarding the materials to the authorized law enforcement authorities in accordance with the requirements of the legislation.

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