REGULATION
ON THE IDENTIFICATION AND RESOLUTION OF CONFLICTS OF INTEREST
OF AUTONOMOUS CLUSTER FUND "ASTANA HUB"

APPROVED: by Autonomous Cluster Fund "Astana Hub" Executive Committee Resolution No. 214

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REGULATION
on the identification and resolution of conflicts of interest of Autonomous Cluster Fund "Astana Hub"

Astana, 2026

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1. General Provisions

1. This Regulation on the identification and resolution of conflicts of interest (hereinafter referred to as the Regulation) of the Autonomous Cluster Fund "Astana Hub" (hereinafter referred to as the Fund) establishes a unified Procedure for identifying, disclosure, assessing, preventing, and resolving conflicts of interest.

2. The Regulation is developed in accordance with the legislation of the Republic of Kazakhstan in the field of combating corruption and labor legislation, as well as legislation on personal data and their protection, and the internal documents of the Fund in the areas of business ethics, anti-corruption compliance, internal control, and risk management.

3. Purpose of the Regulation is to prevent influence of personal interest on the objectivity of decisions and the proper performance of duties by persons to whom the Regulation applies, as well as to protect the legitimate interests, property, and business reputation of the Fund.

4. This Regulation applies to members of governing bodies and collegial bodies, employees of the Fund, its branches and representative offices, including temporary staff, job applicants, interns, as well as individuals performing work or providing services to the Fund under civil law contracts.

Regulation applies to counterparties, partners, suppliers, consultants, and other interested parties within the scope of obligations established by agreements, anti-corruption clauses, and other documents of the Fund.

Subsidiary and affiliated organizations of the Fund shall be guided by these Regulations within the limits provided by their internal documents, agreements, or decisions of authorized bodies.

5. Existence of a personal interest in itself is not a violation. A violation is recognized as the untimely or incomplete disclosure of a conflict of interest, participation in the preparation, discussion, or adoption of decisions with an unresolved conflict of interest, the submission of unreliable or incomplete information, as well as the failure to implement measures to resolve it established by the Fund.

2. Terms and Definitions

6. For the purposes of this Regulation, the following basic concepts are used:

personal interest (personal involvement) — possibility for an employee, their close relatives, spouse, in-laws, or persons associated with them to receive pecuniary or other benefits, advantages, preferences, or other favorable outcomes as a result of the employee performing their official duties or exercising their powers.

Personal interest may be due to kinship, affinity, marriage (spousal), cohabitation, dependency, affiliation, as well as property, corporate, labor, contractual, or other personal relationships;

close relatives — parents, children, adoptive parents, adopted children, full and half-blood brothers and sisters, grandfather, grandmother, grandchildren;

relatives by marriage — full-blooded and half-blooded brothers and sisters, parents and children of a spouse;

related persons— spouse, close relatives, in-laws, as well as other individuals with whom the employee has relationships of cohabitation, dependency, kinship, affinity, marriage (spousal relationship), or property, corporate, labor, contractual, or other personal relationships that can cause employee's personal interest.

Related parties also include legal entities in which an employee or the specified individuals directly or indirectly own shares (participatory interests) or participate in management.

A former spouse is recognized as an affiliated person only if there are ongoing property, family, contractual, or other relationships that can cause the employee's personal interest;

conflict of interest — a contradiction between the personal interests of an employee, official, or other person and their official powers, where personal interest may affect or create the appearance of the possibility of influencing the objective and impartial performance of duties and decision-making in the interests of the Fund;

potential conflict of interest — a situation where a personal interest exists but does not yet affect decision-making or the performance of duties, but may conflict with official duties in the future, and which can beeliminated by preventive measures;

real conflict of interest — a situation in which personal interest influences (a contradiction has already arisen) or may directly influence a person's decision, action, or inaction, and which requires immediate removal from the specific decision and formal resolution;

actual conflict of interest — a situation where an act, decision, contract, or transaction has already been concluded under conditions of conflict, and which additionally requires verification of the consequences of previously made decisions.

disclosure of conflict of interest — written notification to the Fund (through the HR department) of a personal interest or circumstances that have led or may lead to a conflict of interest;

notification (declaration of personal interests) — a document containing information about an employee's personal interest and the circumstances of a potential, actual, or realized conflict of interest. Notification is submitted to the HR department upon hiring (appointment to a position), transfer, change of job duties, as well as upon the occurrence or change of relevant circumstances. Notification is drawn up in the form **according to the appendix** to this Regulation.

authorized unit (person) — the anti-corruption compliance service (anti-corruption compliance officer) or another employee of the Fund, determined by the internal documents of the Fund, who, within the scope of their competence, identifies, prevents, and resolves conflicts of interest.

Authorized unit (person) reviews notifications, declarations of personal interests, and other information about potential or actual conflicts of interest, prepares conclusions and recommendations for its prevention and resolution, monitors the implementation of adopted measures, and also explains to employees the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Fund on conflict of interest issues.

3. Conflict of Interest Management Principles

7. Management of conflicts of interest in the Fund is carried out on the basis of the following principles:

priority of the Fund's legitimate interests, compliance with the legislation of the Republic of Kazakhstan, and prevention of the use of official powers for personal gain;

timely, complete, and conscientious disclosure by an employee of a personal interest and circumstances that could lead to the emergence of a potential, actual, or realized conflict of interest;

conflict of interest prevention, including by declaring personal interests, analyzing corruption risks, reviewing notifications and other received information;

exclusion of an individual with a personal interest from the preparation, consideration, discussion, coordination, adoption, or any other way of influencing a decision in which there is a conflict of interest;

objective, timely, confidential, and individual consideration of each case with the application of proportionate prevention and resolution measures;

documentation of notifications, conclusions, decisions, and measures taken as a result of considering conflicts of interest;

inadmissibility of unjustified adverse action against an employee who has in good faith and in a timely manner disclosed a personal interest or reported a conflict of interest;

monitoring the implementation of adopted measures and assessing their adequacy for preventing or resolving conflicts of interest.

4. Employee Responsibilities

8. Fund employees are obliged to:

1) comply with the requirements of the legislation of the Republic of Kazakhstan, this Regulation, and other internal regulatory documents of the Fund on issues of identification, prevention, and resolution of conflicts of interest;

2) take reasonable and sufficient measures to prevent the occurrence of a potential conflict of interest, including independently eliminating circumstances that could give rise to a personal interest;

3) timely and fully submit a declaration of personal interests to the HR office upon hiring (appointment to a position), transfer to another position, change in job responsibilities, as well as when circumstances arise or change that could lead to a conflict of interest;

4) notify their direct supervisor and the authorized department (person) in writing in the manner established by this Regulation immediately, but no later than two business days from the date the employee became aware of a real conflict of interest;

5) prior to adoption of a decision on an issue where a real conflict of interest exists, not to participate in its preparation, consideration, discussion, approval, adoption, and execution, as well as not to exert direct or indirect influence on the adoption of such a decision;

6) provide reliable, complete, and up-to-date information, documents, and explanations necessary to establish the presence or absence of a potential or actual conflict of interest and to choose a measure for its resolution;

7) implement decisions and measures to prevent and resolve conflicts of interest adopted by authorized individuals of the Fund, including recusal, delegation of authority, exclusion from a Committee or working group, change of duties, transfer, or other applicable measures;

8) promptly report any new circumstances or changes to information previously provided in a disclosure if they may affect the conclusion regarding the existence of a conflict of interest or the adequacy of the measures taken;

9) not to use or disclose for personal gain or for the benefit of third parties any official, confidential, commercial, insider, or other restricted information obtained in connection with the performance of official duties;

10) not to take actions or make decisions in the interests of affiliated persons if such actions or decisions contradict the legitimate interests of the Fund or are caused by the employee's personal interest;

11) assist the authorized unit (individual) in considering the notification, conducting an analysis of corruption risks, and monitoring the implementation of measures to prevent and resolve conflicts of interest;

12) maintain confidentiality of information that becomes known in connection with the review of notifications, declarations of personal interests, and other materials on conflict of interest, except in cases established by the legislation of the Republic of Kazakhstan or the internal documents of the Fund.

9. Officials and heads of structural units, upon receiving notification of an employee's personal interest or conflict of interest, are obliged to:

1) ensure immediate exclusion of an employee with a personal interest from preparation, review, discussion, approval, adoption, and implementation of a decision on the relevant issue, as well as exclude the possibility of direct or indirect influence of such an employee on the decision-making process;

2) send notification and available materials to the authorized unit (individual) no later than one business day from the date of receipt;

3) if necessary, ensure transfer of relevant powers to another employee for the period of considering the notification and making a decision on resolving the conflict of interest;

4) provide authorized unit (individual) with the necessary documents, information, and explanations within their competence;

5) facilitate implementation of decisions and measures to prevent or resolve conflicts of interest;

6) not to allow unjustified adverse impact, discrimination, harassment, or deterioration of working conditions with regard to an employee who has in good faith disclosed personal interest or notified about a potential or real conflict of interest;

7) ensure confidentiality of information contained in the notification and its review materials, except in cases established by the legislation of the Republic of Kazakhstan and the internal documents of the Fund.

10. An employee who becomes aware of a possible personal interest, a potential or real conflict of interest of another employee, has the right to conscientiously report it to their direct supervisor, to the authorized department (person), or through the initiative reporting channels provided by the Fund.

Message must be based on facts, documents, circumstances known to the employee, or reasonable assumptions, and must not contain knowingly false,

unreliable, or misleading information.

11. The individual who received the notification provided for in paragraph 10 of this Regulation shall ensure its confidential forwarding to the authorized unit (person) no later than one business day from the date of receipt.

12. Authorized unit (person) shall consider the received report in the manner prescribed by this Regulation, observing the principles of objectivity, confidentiality, presumption of good faith, and personal data protection.

13. A report of a potential conflict of interest, in itself, is not grounds for bringing an employee to disciplinary action, suspension from work, or the application of other adverse measures until the relevant circumstances are established in the manner prescribed by this Regulation.

14. Employees and heads of structural units shall be liable for non-fulfillment or improper fulfillment of the duties established by this section in accordance with the legislation of the Republic of Kazakhstan, employment contract, and internal documents of the Fund.

5. Situations Subject to Disclosure

15. The employee is obliged to disclose a personal interest and notify of a potential or actual conflict of interest in the presence of, including, the following circumstances:

1) participation in the selection of a counterparty, procurement, evaluation of proposals, negotiation, conclusion, execution, amendment, or termination of a contract, including a civil law contract, with a legal entity, individual entrepreneur, or individual, if:

an employee, their close relative, or an affiliated individual is an employee, director, participant, shareholder, beneficial owner, member of a management body, or representative of such a counterparty, or has any other direct or indirect proprietary interest in it;

counterparty – an individual – is the employee themselves, their close relative, or an affiliated individual;

2) participation in making a personnel decision regarding a close relative, spouse, in-law, or affiliated person, including hiring, appointment, transfer, performance appraisal, setting remuneration, awarding bonuses, granting benefits, promotion, disciplinary action, termination of employment, or any other decision affecting their labor rights and interests;

3) employee engaging in other paid activities, participating in management bodies, owning shares (stakes), having the status of an individual entrepreneur, or having other proprietary interests in an organization whose interests intersect or may intersect with the Fund's interests;

4) receiving, offering, promising, or intending to receive from a counterparty, potential counterparty, supplier, partner, or other interested party a gift, service, discount, payment of expenses, loan, invitation, reward, or other benefit that could influence or create a risk of influencing the employee's objectivity in the performance of their official duties;

5) use or possibility of using official, confidential, commercial, insider, or other restricted access information for the personal benefit of the employee or for the

benefit of third parties;

6) participation in the preparation, consideration, approval, adoption, or execution of a decision that may directly or indirectly result in the employee, their close relative, spouse, in-law, or affiliated person receiving pecuniary or other benefits, advantages, preferences, or other favorable outcomes;

7) existence of a joint business, property obligations, contractual relations, corporate dependence, cohabitation, dependency, or other relationships with a person whose interests are affected or may be affected by a decision made by the employee within the scope of their official duties;

8) emergence of a situation where an employee's personal interest may influence, or create a reasonable presumption of influence on objective, impartial, and proper performance of their official duties or exercise of their powers.

16. List of circumstances specified in paragraph 15 of this Regulation is not exhaustive. An employee is obliged to disclose a personal interest and notify of a potential or actual conflict of interest in the event of any other circumstances that meet the criteria of a personal interest or conflict of interest established by the legislation of the Republic of Kazakhstan and this Regulation.

6. Disclosure, Registration, and Review

17. Employee is obliged to disclose any personal interest by submitting a declaration of personal interests and/or providing notification in the manner prescribed by this Regulation.

In the event of an actual conflict of interest, the employee is obliged to immediately, but no later than two business days from the date they became aware of such a conflict, send a written notification to their direct supervisor and the authorized department (person).

If a potential conflict of interest arises, the employee is obliged to take measures to eliminate it independently and, if necessary, submit a notification or contact the authorized department (individual) for clarification and recommendations.

18. If the conflict of interest concerns a direct supervisor, a member of the Fund's Executive Committee, or if there are reasonable grounds to believe that the notification will not be considered objectively, the employee sends the notification directly to the authorized department (individual), and if necessary, to the individual or to the Fund's Management Committee authorized to make decisions on resolving conflicts of interest.

18. If the conflict of interest concerns a direct supervisor or a member of the Fund's Executive Committee, or if there are reasonable doubts about the objectivity of the review of the notification by these individuals, the employee shall send a written notification directly to the authorized unit (individual) of the Fund, bypassing these individuals.

Notification shall be submitted for a decision on resolving the conflict of interest to an official or to the Fund's Management Committee, whose competence, as defined by the charter and/or internal regulations, includes making the relevant decision.

Review of the notification and the decision-making process are carried out

without the participation of persons with a conflict of interest regarding the matter under consideration.

19. Notification shall be submitted in written or electronic form, in accordance with the appendix to this Regulation, to the authorized unit (person) or the HR office of the Fund.

In the absence of possibility to use the established form, a notification may be submitted in any form, with mandatory indication of information about personal interest, circumstances of the conflict, affected powers, decisions or procedures, as well as, if available, about independently taken measures.

20. Before a decision on resolving a real conflict of interest is made, the employee with a personal interest is obliged to refrain from preparing, reviewing, discussing, approving, making, and executing decisions on the relevant matter, as well as from directly or indirectly influencing their adoption.

By decision of an authorized person or body of the Fund, an employee may perform exclusively technical actions that are not related to the assessment, preparation, approval, or decision-making and do not allow influencing its content, deadlines, or outcome.

21. Authorized unit (individual):

1) accepts and registers notifications, declarations of personal interests, and other information about potential or actual conflicts of interest in a confidential register, including initial notifications received from the HR department;

2) conducts a preliminary assessment of the submitted materials, and if necessary, requests documents, information, and explanations from employees, structural divisions, and other individuals of the Fund;

3) considers information about a potential or actual conflict of interest, including information identified during internal analysis of corruption risks, inspections, audits, and personnel and procurement procedures;

4) prepares a reasoned conclusion on the presence or absence of a potential or actual conflict of interest and recommendations on measures to prevent or resolve it;

5) forwards the conclusion, recommendations, and materials to the individual or body of the Fund authorized to make a decision;

6) monitors the implementation of the adopted decision and the adequacy of the measures taken;

7) ensures the confidentiality of materials, compliance with personal data regulations, commercial, service, and other legally protected secrets.

8) participates in conducting internal analysis of corruption risks as part of a working group to identify circumstances indicating a possible undisclosed personal interest, potential or real conflict of interest.

22. Authorized unit conclusion shall be prepared immediately, but no later than three working days from the date of registration of the notification or receipt of other information about a potential or actual conflict of interest.

If documents or explanations are required to prepare conclusion, the period is calculated from the day the last of the requested materials is received, but the total review period should not exceed ten working days, except in cases of internal audit or consideration by a collegial body of the Fund.

23. Decision on the measure to prevent or resolve a conflict of interest shall be made by the authorized person or body of the Fund no later than ten working days

from the date of the conclusion receipt.

Decision is made in writing and must contain:

information about employee and circumstances of the case under consideration;

conclusion on presence or absence of a potential, actual, or existing conflict of interest;

chosen measure for prevention or settlement, deadline, and those responsible for its implementation;

procedure for monitoring the implementation of decisions

if necessary – an order to conduct an internal audit, review a previously made decision, contract, transaction, or to forward materials to an authorized state body.

24. Based on the results of notification review or other information, one of the following decisions is made:

1) personal interest and conflict of interest are absent;

2) a potential conflict of interest has been identified, which is subject to independent resolution by the employee and/or the application of preventive measures;

3) a real conflict of interest has been identified, requiring the application of settlement measures;

4) a conflict of interest has been identified, requiring an assessment of legal consequences of the decision made, transaction completed, contract concluded, or any other action.

5) there are signs of violation of the legislation of the Republic of Kazakhstan or the Fund internal documents, which require conducting an internal investigation, applying disciplinary measures, or forwarding materials to the authorized state body in cases provided for by the legislation of the Republic of Kazakhstan.

25. An employee in respect of whom a notification or other information is being considered has the right to provide written and oral explanations, submit documents and other materials, recuse themselves, and also to familiarize themselves with materials pertaining to them to an extent that does not impede objective consideration and does not violate confidentiality, rights and legitimate interests of other persons, as well as the requirements of the legislation of the Republic of Kazakhstan.

26. An employee shall not be held liable solely for the existence of a conflict of interest if they have timely and in good faith disclosed a personal interest, notified about an actual conflict of interest, or recused themselves in the manner and within the timeframes established by the legislation of the Republic of Kazakhstan and these Regulations. Liability may arise for concealing a personal interest, failure to notify, participation in decision-making in the presence of a conflict, or failure to implement an adopted resolution measure.

7. Conflict of Interest resolution

27. Measures to prevent and resolve conflicts of interest are determined taking into account the type of conflict of interest, nature of the personal interest, degree of risk to the Fund, powers affected, and specific circumstances of the case.

In case of a potential conflict of interest, employee shall take measures to

eliminate it independently, and if necessary, upon the recommendation of an authorized department (person) or based on a decision of an authorized person (body) of the Fund.

28. In the event of a real conflict of interest, one or more of the following measures shall be applied:

1) recusal of an employee or their removal from the preparation, consideration, discussion, approval, adoption, or execution of a decision on a relevant issue, including participation in negotiations, procurement, personnel procedures, contractual work, Committees, and working groups;

2) transfer of authority on the issue concerned to another employee, manager, structural unit, or collegial body of the Fund;

3) changes in the composition of the Committee, working group, collegial body, or other persons involved in the preparation, approval, or decision-making;

4) restricting employee's access to specific official, confidential, commercial, insider, or other restricted information if its use may be related to personal interest;

5) changes to employee's job duties, functions, subordination, or distribution of powers, in the manner established by the legislation of the Republic of Kazakhstan and internal documents of the Fund;

6) voluntary renunciation by an employee of a personal interest that is the conflict cause, including termination of external paid activities, resignation from a management body, withdrawal from capital participation, refusal of representation, or termination of other relationships – provided there is a legal and factual possibility;

7) transfer of an employee, with their written consent, to another position, labor functions of which exclude or minimize a conflict of interest, in compliance with the requirements of the labor legislation of the Republic of Kazakhstan;

8) revision, suspension of execution, amendment or termination of a contract, transaction or other decision made or executed under conditions of a conflict of interest, if there are grounds provided for by the legislation of the Republic of Kazakhstan and the contract;

9) conducting an internal audit and, if grounds exist, forwarding the materials to authorized state bodies;

10) other measures proportionate to the nature of the conflict of interest and not contrary to the legislation of the Republic of Kazakhstan.

29. If a conflict of interest cannot be eliminated through the measures specified in paragraph 28 of this Regulation, the Fund shall consider transferring the employee to another position.

Termination of an employment contract is permitted only when it is impossible to resolve a conflict of interest and exclusively on the grounds provided for, in compliance with the procedure and guarantees established by the labor legislation of the Republic of Kazakhstan.

30. Decision on application of measures to prevent or resolve conflicts of interest is made by the Director General of the Fund or the executive body of the Fund based on the conclusion and recommendations of the authorized unit (individual).

Decision is made in written or electronic form and contains:

description of established circumstances and conclusion on presence or absence of a potential, actual, or realized conflict of interest;

measures applied, term and procedure for their execution;

employee, structural unit, or other body of the Fund responsible for implementing measures;

procedure for execution control, including frequency and duration of monitoring;

if necessary — a list of actions to eliminate the consequences of an actual conflict of interest.

31. Authorized unit (individual) monitors the implementation of the decision and, upon identifying its non-implementation, insufficiency, or the emergence of new circumstances, submits proposals to the General Director of the Fund for adoption of additional or amendment of previously adopted measures.

8. Special Cases and Independence of Consideration

32. If a notification, declaration of personal interests, or other information regarding a potential or actual conflict of interest concerns the Fund's Chief Executive Officer or a member of the Fund's Executive Committee, Anti-Corruption Compliance Officer shall forward the materials to the Chairperson of the Fund's Governing Committee for consideration and a decision on the merits.

If the specified information is received directly by the General Director or a member of the Fund's Executive Committee, it shall be immediately forwarded to the anti-corruption compliance officer for registration, preliminary review, and preparation of a conclusion.

33. If a notification, declaration of personal interests, or other information concerns the anti-corruption compliance officer or an employee of the Fund's internal audit service, the materials shall be sent by the Chairman of the Fund's Executive Committee to the Chairman of the Fund's Management Committee to ensure independent review and decision-making.

If necessary, Chairman of the Fund's Management Committee has the right to appoint an independent individual, a structural unit, or to engage an external specialist to conduct an assessment of the submitted materials and prepare recommendations.

34. A member of the Fund's Executive Committee who has a personal interest in a matter under consideration is obliged to immediately recuse themselves and not participate in the preparation, consideration, discussion, agreement, adoption, or execution of a decision on such a matter, nor to exert direct or indirect influence on the course of its consideration.

Information about recusal and abstention from voting shall be reflected in the minutes of the meeting of the Fund's Executive Committee.

35. A person in respect of whom a notification, declaration of personal interests, or other information about a conflict of interest is being considered, as well as other persons with a personal interest, shall not be entitled to interfere in the consideration procedure, give binding instructions, exert pressure, or otherwise influence the conclusions of the authorized unit (individual), members of the collegial body, or the decision being made.

At the same time, the specified individual has the right to provide written or oral explanations, documents, objections, and other materials related to the circumstances under consideration, as well as to familiarize themselves with the materials pertaining to them, subject to the requirements of confidentiality, personal

data legislation, and the rights of other persons.

36. Persons involved in the review of a notification, declaration of personal interests, or other information about a conflict of interest are obliged to ensure the objectivity and independence of the review, maintain the confidentiality of the information received, and recuse themselves if they have a personal interest in the matter under consideration.

If a personal interest arises for a person authorized to review a notification or make a decision, their authority in a specific case is transferred to another person or body of the Fund in the manner established by the internal documents of the Fund.

9. Confidentiality and Personal Data

37. Notifications (declarations) and information on personal interest, materials of their consideration, conclusions, recommendations, and decisions on issues of prevention and settlement of conflicts of interest are confidential information and are used exclusively for the purposes provided for by this Regulation and the legislation of the Republic of Kazakhstan.

38. Access to the information specified in paragraph 37 of this Regulation shall be granted only to employees and members of the Fund's bodies who require such information for the acceptance, registration, and consideration of a notification or declaration, the preparation of an opinion, the adoption and execution of a decision, as well as for monitoring the measures taken.

Specified individuals are obliged to maintain confidentiality of the information received and are not entitled to disclose it to third parties, except in cases provided for by the legislation of the Republic of Kazakhstan, the internal documents of the Fund, or when it is necessary to protect the rights and legitimate interests of the Fund.

39**.** Collection, receipt, registration, storage, use, transfer, anonymization, destruction, and other processing of personal data within the framework of the implementation of this Regulation are carried out in accordance with the legislation of the Republic of Kazakhstan on personal data and their protection, the legislation on combating corruption, and the internal documents of the Fund.

Scope of personal data processed must be limited to information that is necessary and sufficient for identifying, assessing, preventing, or resolving a specific potential, actual, or past conflict of interest.

40. The Fund takes the necessary organizational, legal, and technical measures to protect information and personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, and other unlawful actions.

Notifications (declarations) and information on personal interest, review materials, conclusions, decisions, and registers are stored in accordance with the Fund's case nomenclature, established document retention periods, and the legislation of the Republic of Kazakhstan.

10. Responsibility

41. Individuals guilty of violating requirements of this Regulation shall be held liable in accordance with the legislation of the Republic of Kazakhstan, terms of the

employment contract, and internal documents of the Fund.

Violations of the requirements of this Regulation include, but are not limited to:

non-disclosure or untimely disclosure of a personal interest, a potential or real conflict of interest;

failure to submit declaration of personal interests or notification in cases provided for by this Regulation;

providing knowingly false, incomplete, or misleading information;

participation in preparation, consideration, approval, adoption, or execution of a decision in the presence of an unresolved real conflict of interest;

failure to implement or improper implementation of a measure to prevent or resolve a conflict of interest;

unlawful interference with the procedure for considering a notification, declaration of personal interests, or other information;

unlawful disclosure, use, or transfer of confidential information and personal data obtained during the application of this Regulation.

42. Timely and conscientious disclosure by an employee of a personal interest, submission of a notification, declaration of personal interests, recusal statement, or reporting of a potential conflict of interest of another individual shall not be grounds for applying unreasonable adverse measures, discrimination, harassment, or deterioration of working conditions to the employee.

Disclosure of personal interest or conflict of interest does not exempt an individual from liability for unlawful actions, violations of the legislation of the Republic of Kazakhstan, labor contract, or internal documents of the Fund committed by them.

11. Final provisions

44. This Regulation is an integral part of the Fund's corporate governance, internal control, risk management, business ethics, and anti-corruption compliance system and is applied in conjunction with the Fund's Charter and other internal documents.

45. In case of contradiction between provisions of this Regulation and legislation of the Republic of Kazakhstan, norms of the legislation of the Republic of Kazakhstan shall apply.

Recognition of an individual provision as invalid, unenforceable, or contrary to the legislation of the Republic of Kazakhstan shall not entail the invalidity of the remaining provisions.

46. Authorized unit (individual) provides methodological support for the application of this Regulation, including clarifying its requirements, consulting employees, preparing methodological materials, and conducting information and explanatory events.

47. Fund ensures that employees are familiarized with these Regulations upon hiring, as well as when amendments and additions are made, through internal information resources, training, briefings, notifications, and other available methods.

Requirements of this Regulation applicable to members of the Fund's bodies, counterparties, suppliers, consultants, and other interested parties shall be brought to

their attention to the extent permitted by the legislation of the Republic of Kazakhstan, contracts, and internal documents of the Fund.

48. This Regulation shall be reviewed at least once every three years, as well as upon changes in the legislation of the Republic of Kazakhstan, organizational structure or business processes of the Fund, powers of its bodies, results of an internal analysis of corruption risks, or identification of insufficient existing conflict of interest management procedures.

49. This Regulation is approved by the executive collegial body of the Fund and remain in effect until that body decides to terminate them.

50. Amendments and additions to this Regulation is approved by the executive collegial body of the Fund in accordance with the Fund Charter, internal documents of the Fund, and distribution of powers.

Appendix to the Regulation on
identification and resolution of conflicts of interest

Confidential

Notice (Declaration of Personal Interests)

(to be filled in if there is a conflict of interest)

I, _____ (last name, first name, patronymic, position)
hereby notify of the existence or potential occurrence of a conflict of interest.
1. Description of circumstances
2. Individuals and organizations associated with the circumstances
3. Nature of personal interest
4. Fund matters, decisions, or processes that may be affected by a personal interest
5. Proposed settlement measures
6. Appendices

I confirm that the information provided is complete and accurate to the best of my knowledge. I undertake to immediately report any change in the specified circumstances.

Signature: _____ Date: _____

Service Mark of the Fund

Date of registration: _____ Registration number_____

Decision based on the review results:

☐ no personal interest and conflict of interest;

☐ a potential conflict of interest has been identified, which is subject to self-elimination by the employee and/or the application of preventive measures;

☐ a real conflict of interest has been identified that requires settlement measures;

☐ a conflict of interest has been identified, requiring an assessment of legal consequences of the decision made, transaction completed, contract concluded, or any other action.

☐ there are signs of violation of the legislation of the Republic of Kazakhstan or the Fund internal documents, which require conducting an internal investigation, applying disciplinary measures, or forwarding materials to the authorized state body in cases provided for by the legislation of the Republic of Kazakhstan.

Measures taken and deadline for implementation:

Signature of Authorized Fund Representative: _____