 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 1 from 17


Annex № _____ to
 protocol of the in-person meeting
 of the board of directors of
 JSC «NC «QazaqGaz»

Approved
 By the resolution of the Board of
 Directors
 JSC «NC «QazaqGaz»
 Protocol No. _____
 from « _____ » 2023




POLICY
Resolution of conflicts of interests of
JSC «NC «QazaqGaz»

Astana city 2023

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 2 from 17

Entered: Instead of the document P-00-21 "Policy for the settlement of conflicts of interest among employees and officials of KazTransGas JSC", approved by the decision of the Board of Directors of KazTransGas JSC dated October 13, 2021 (Minutes No. 8)

Date of revision: 2026

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 3 from 17

Content

1. Purpose and scope	4
2. Regulatory references	4
3. Terms and definitions	5
4. Abbreviations and symbols	5
5. Responsibility and authority	6
6. Main part	6
7. Basic principles of conflict of interest management.....	6
8. Obligations of officials and employees to manage conflicts of interest	7
9. Procedure and methods for disclosing information about the conflict of interest .	8
10 Managing conflicts of interest	9
11. Responsibility.....	11
Annex No.1	11
Annex No. 2.....	13
Annex No. 3.....	15
APPROVAL SHEET	17

1. Purpose and scope

1.1. This Conflict of Interest Policy of JSC NC QazaqGaz (hereinafter - Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan, international corporate governance practice, the Charter, the Code of Business Ethics, the Policy for Settling Conflicts of Interest of JSC Samruk-Kazyna, the Anti-Corruption Policy of NC JSC QazaqGaz and other internal documents of JSC NC QazaqGaz (hereinafter - Company).

1.2. The Policy establishes general principles for the settlement of conflicts of interest and other activities of the Company that affect the area of settlement of conflicts of interest.

1.3. The Company understands that officials and employees of the Company may have legitimate personal interests outside the scope of their professional duties in the Company, but any conflict of interest between such personal interests and professional duties in the Company must be disclosed and settled in accordance with the Policy.

1.4. The Policy applies to all types of activities of the Company. The Policy is mandatory for familiarization and Annex by all officers and employees of the Company upon taking office. In the performance of functional duties and the implementation of the tasks set, each officer and employee of the Company is guided by the provisions set forth in the Policy.

1.5. The main goals of the Policy are:

(a) fixing the basic principles of the Company in relation to conflicts of interest and requirements for employees and officials to comply with these principles;

(b) determination of procedures for disclosing information about potential conflicts of interest, mechanisms for making management decisions and norms of behavior for employees and officials in the context of existing conflicts of interest;

(c) provision of general information to employees and officials on the measures taken to identify, manage and resolve conflicts of interest in the Company.

1.6. The Policy is an internal document of the Company and is approved by the decision of the Board of Directors of the Company (including amendments and (or) additions to the Policy).

1.7. Annex of the Policy of the SA may be carried out in accordance with the established procedure by developing and approving a similar policy or bringing the internal documents of the SA in line with this Policy. At the same time, the requirements stipulated by the Policy in similar policies and internal documents of SAs should not be reduced or simplified.

2. Regulatory references

2.1. This Policy provides links to the following legal acts, national standards and internal regulations:

-Law of the Republic of Kazakhstan dated November 18, 2015 No. 410-V "On Combating Corruption";

- Law of the Republic of Kazakhstan dated May 13, 2003 No. 415-II "On Joint Stock Companies";


- Code of business ethics of QazaqGaz;

- Anti-corruption policy of QazaqGaz;

- General requirements for the development, execution and presentation of internal regulatory documents of NC QazaqGaz JSC (DM-01);

- Documentation management (DM-02);

- Records management (DM-03).

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 5 from 17

3. Terms and definitions

3.1. This Policy uses the terms and their respective definitions in accordance with Table 1.

Table 1. Terms and definitions


Terms	Definitions
Affiliates	individuals or legal entities (with the exception of state bodies exercising control and supervisory functions within the powers granted to them) that have the ability to directly and (or) indirectly determine decisions and (or) influence decisions made by each other (one of the persons), including by virtue of a concluded transaction. The list of affiliated persons of the Company is established in accordance with Article 64 of the Law of the Republic of Kazakhstan "On Joint Stock Companies";
Close relatives	parents (parent), children, adoptive parents, adopted, full and half brothers and sisters, grandfather, grandmother, grandchildren;
Executive	members of the Board of Directors, Management Board, and other persons of QazaqGaz, equated to persons authorized to perform state functions in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption";
Counterparty	an individual or legal entity with whom the Company has concluded or plans to conclude an agreement;
Conflict of interest	a contradiction between the personal interests of officials/employees and their official powers, in which the personal interests of these persons may lead to non-performance and (or) improper performance of their official duties;
Relatives	full and half brothers, sisters, parents and children of the spouse (wife);

4. Abbreviations and symbols

4.1. This Policy uses abbreviations and designations in accordance with Table 2.

Table 2. Abbreviations and symbols

No. p / n	Designations and abbreviations	The full name of the given designations and abbreviations
1	subsidiaries and affiliates	Subsidiaries and affiliates, including jointly controlled organizations and joint ventures of JSC NC QazaqGaz
2	Society	JSC "NC "QazaqGaz"
3	SC	Service of compliance

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 6 from 17

4	DHRMC	Department of Human Resource Management and Compensation
5	SD	Structural divisions of the Company

The definitions used, but not disclosed in this Policy, correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal documents of the Company and SDEs.

5. Responsibility and authority

5.1. The Head of the Compliance Service is responsible for the development of this Policy in accordance with the requirements of the documented procedure DM-01 "General requirements for the content, presentation and execution of the Company's internal regulatory documents".

5.2. Responsibility for the management of this Policy in accordance with the requirements of the documented procedure DM-02 "Documentation Management" lies with the Head of the Compliance Service and the Head of the Department for Human Resources Management and Remuneration.

5.3. Responsibility for the correct Annex of this Policy, the provision of timely, complete, reliable and high-quality information lies with the officers and employees of the Company.

6. Main part

6.1. The policy is aimed at implementing the provisions of the Code of Conduct of the Company, according to which one of the necessary conditions for the effective performance of their duties by employees is the absence of contradictions between the private interests of employees, officials and their official powers, and in the presence of such contradictions, their timely disclosure and settlement. The body that ensures the settlement of conflicts of interest of employees is the Management Board of the Company, and the body that ensures the settlement of conflicts of interest of members of the Management Board is the Board of Directors of the Company.

6.2. The purpose of the Policy is to increase the efficiency of decisions made by ensuring a fair, objective and independent decision-making process in the interests of the Company and its Sole Shareholder through the creation of a uniform management of real and potential conflicts of interest in the Company, as well as the definition of requirements for the behavior of employees and officials, compliance with which will minimize the risks of decision-making in the Company under the influence of private interests and relations of employees and officials.

6.3. All employees and officials of the Company must behave in such a way as to prevent a situation in which a conflict of interest may arise in relation to themselves (or persons related to them).

7. Basic principles of conflict of interest management

7.1. The Company manages conflicts of interest (prevention and settlement) based on the following key principles for managing conflicts of interest:

1) the principle of legality - compliance of the Policy with the legislation of the Republic of Kazakhstan and internal documents of the Company;

2) the principle of protecting the interests of the Company. Officials and employees are obliged to make decisions based only on the provisions of the legislation of the Republic of Kazakhstan and internal documents of the Company, and not on the basis of personal preferences;

3) the principle of ensuring transparency and accountability - open declaration of personal interests and performance of official duties within the prescribed procedures form the basis for ensuring openness and accountability, which helps to prevent or resolve conflicts of interest;

4) the principle of objectivity and individual consideration - each case of a conflict of interest must be considered individually with an assessment of potential risks for the Company and resolved in a timely manner. Officials and employees should strive to minimize any subjectivity that distorts the real situation of a conflict of interest, including any influence of personal interests and various factors on the process and results of the study of a conflict of interest;

5) the principle of confidentiality - strict observance of confidentiality: from the process of disclosure of information about a conflict of interest and the process of further settlement of a conflict of interest to the stage of summing up and making a final decision on the situation under consideration;

6) the principle of involvement - awareness of officials and employees of the Company about the provisions of anti-corruption legislation and their active participation in the formation and implementation of anti-corruption standards and procedures, including in the field of prevention, detection and settlement of conflicts of interest;

7) the principle of intolerance to conflicts of interest - the Company forms a culture and a high degree of intolerance to the emergence of conflicts of interest in its working environment. The Company welcomes the disclosure by its officials and employees of possible conflicts of interest and develops an internal culture of open communication aimed at their understanding of the provisions of this Policy;

8) the principle of personal example - by their actions, top management and other officials serve as a personal example of integrity and ethical behavior, demonstrate commitment to professionalism and strictly comply with the requirements of the Policy;

9) the principle of personal responsibility and the inevitability of punishment - officials and employees are personally responsible for maintaining a balance between personal interest and their official powers, and must also be responsible for declaring and identifying their personal interests in the performance of duties / official duties.

8. Obligations of officials and employees to manage conflicts of interest

8.1. The Board of Directors and the Management Board should monitor and, if possible, eliminate potential conflicts of interest at the level of officials, including misuse of the Company's property and abuse of official powers when concluding transactions of interest.


8.2. A transaction in which there is an interest may be concluded in accordance with the legislation of the Republic of Kazakhstan and the internal documents of the Company.

8.3. Officials are required to:

1) avoid situations of conflict of interest;

2) refrain from participating in the consideration of issues in which they have a conflict of interest, and making decisions on them;

3) not participate in decision-making related to their own appointment, election and re-election, and remuneration;

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 8 from 17

4) communicate in advance information about the existing conflict of interest in writing or electronically to the Chairman of the Board of Directors / Chairman of the Management Board and not participate in the decision-making on the issue in accordance with the requirements of the Policy;

5) provide the Company with information about its affiliates in the prescribed manner;

6) report information about violations of the requirements of the Policy or the potential possibility of such a violation in the manner and under the conditions provided for by the Policy;

7) when making decisions on business matters and performing their official duties, be guided by the interests of the Company without taking into account personal interests, the interests of persons who are close relatives, spouse or in-laws;

8) when exercising their official duties, act only within the limits of their authority and, representing the Company before third parties, behave in such a way as not to harm their own business reputation, the business reputation of other employees of the Company, as well as the Company as a whole;

9) whenever possible avoid situations and circumstances that lead or may lead to a conflict of interest;

10) to introduce a culture of intolerance of conflicts of interest by personal example.

8.4. Employees are obliged:

Employees are required to:

1) avoid situations of conflict of interest;

2) refrain from participating in the consideration of issues in which they have a conflict of interest, and making decisions on them;

3) communicate information about the existing conflict of interest to their immediate supervisor/supervising manager in accordance with the requirements of the Policy;

4) report information about violations of the requirements of the Policy or the potential possibility of such a violation in the manner and on the conditions provided for by the Policy;

5) when making decisions on business matters and performing their labor duties, be guided by the interests of the Company without taking into account personal interests, the interests of persons who are close relatives, spouse or in-laws;

6) when exercising their labor duties, act only within the limits of their authority and, representing the Company before third parties, behave in such a way as not to harm their own business reputation, the business reputation of other employees of the Company, as well as the Company as a whole;

7) whenever possible avoid situations and circumstances that lead or may lead to a conflict of interest;

8) notify the immediate supervisor and the SC of the emergence of a personal interest in the performance of labor duties, which leads or may lead to a conflict of interest, and take measures to prevent any possibility of a conflict of interest.

8.5. Intervention of officials in the activities of the joint venture of the Company, both included and not included in their direct subordination, in order to influence decision-making, is prohibited.

9. Procedure and methods for disclosing information about a conflict of interest

9.1. Disclosure of information about a conflict of interest by officials and employees is carried out immediately in writing or electronically in accordance with Annex No. 1 to the Policy, with a detailed justification and documentary evidence of the existence or occurrence of a conflict

of interest. Officials and employees are required to disclose information as a situation arises in which the existence of a personal interest may lead or has led to the emergence of a conflict of interest. One-time disclosure is carried out by filling out a notice of the presence or occurrence of a conflict of interest in the form in accordance with Annex No. 2 to the Policy.

9.2. The Company establishes the following procedure for disclosing (declaring) a conflict of interest for officials and employees:

- 1) initial disclosure of information about a conflict of interest when hiring;
- 2) disclosure of information about a conflict of interest when transferred to a higher position, to another joint venture, when changing functionality;
- 3) annual disclosure of conflicts of interest;
- 4) one-time disclosure of information as a situation arises in which the presence of personal interest may lead or has led to the emergence of a conflict of interest. One-time disclosure is carried out by filling out a notice of the presence or occurrence of a conflict of interest in the form in accordance with Annex No. 2 to the Policy.

9.3. Completed declarations on the disclosure of a potential conflict of interest (Annex No. 1), notifications of the presence or occurrence of a conflict of interest (Annex No. 2), taking into account the procedure for disclosing information defined by this Policy, are subject to mandatory transfer by the Company's officials and employees to the DHRMC for storage in personal files, a copy is transferred to the UK.


9.4. Concealment and / or untimely, incomplete disclosure of information about the presence of a direct or potential conflict of interest by officials are the causes and conditions for the emergence of corruption risks.

9.5. An employee of the SC has the right at any time to request from the persons involved in the consideration, settlement of a conflict of interest, up-to-date information on the status of the implementation of measures and conduct random checks.

10 Managing conflicts of interest

10.1. If a conflict of interest is identified, the head (immediate supervisor/supervising manager), Chairman of the Board of Directors/Chairman of the Management Board, who has received a notice of the presence or occurrence of a conflict of interest in accordance with Annex No. 2 to the Policy from an employee/official of the Company, decides to resolve the conflict of interest in one of the following ways:

- 1) refusal of the employee/official from his personal interest, which is the source of the conflict of interest;
- 2) a restriction on the use by an employee/official of information that is the object of his personal interest;
- 3) permanent or temporary suspension of the employee from the discussion and resolution of issues that give rise to a conflict of interest, on a voluntary basis or on the basis of an act of the employer;
- 4) change of his official duties in agreement with the employee / official;
- 5) transfer of an employee/official to a position not related to a conflict of interest, if the employee/official agrees, in the manner prescribed by the labor legislation of the Republic of Kazakhstan;
- 6) remove an official from the performance of official duties and entrust another person with the performance of official duties on the issue in connection with which a conflict of interest has arisen or may arise;

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 10 from 17

7) take other measures to eliminate the conflict of interest provided for by the legislation of the Republic of Kazakhstan.

10.2. The head (immediate supervisor/managing supervisor), Chairman of the Board of Directors/Chairman of the Management Board is obliged to inform the employee/official about the inadmissibility of violation of the requirements for settling a conflict of interest established for the purpose of combating corruption, to warn him of the liability measures applied in case of such a violation.

10.3. In case of non-disclosure of a conflict of interest by an employee/official to which he is a party, he is subject to disciplinary measures.

10.4. If an employee/official disagrees with the results of consideration of a notice of the presence or occurrence of a conflict of interest, or the impossibility of independently making a decision on the existence of a conflict of interest, determining the extent of emerging risks or choosing a method for resolving a conflict of interest, the manager (immediate supervisor/managing supervisor), Chairman of the Board of Directors/Chairman of the Management Board has the right to send an Annex for consideration by the SC. Within 5 (five) working days, the SC considers and gives its opinion on this issue.

10.5. If, as a result of considering a conflict of interest, it becomes necessary to develop or amend the current internal documents of the Company, the SC recommends that the owner of the process make appropriate changes

10.6. Examples of situations of conflict of interest or situations that may lead to a conflict of interest are set out in Annex No. 3 to the Policy.

11. Responsibility

11.1. Officials and employees are responsible for the implementation of the Policy.

11.2. In the event that in the work to resolve a conflict of interest, violations of the requirements of the legislation of the Republic of Kazakhstan, as well as the Policy, which led to losses to the Company, are committed, the persons guilty of such a violation are held liable in accordance with the legislation of the Republic of Kazakhstan.

Annex No. 1**Declaration of Disclosure of a Potential Conflict of Interest**

I (Last name, first name, patronymic (if any))

undertake, while carrying out my activities in JSC NC QazaqGaz, to strictly follow the requirements of the JSC NC QazaqGaz Conflict of Interest Policy and declare the presence or absence of the following potential conflicts of interest:

1. I am a member of the management bodies (board of directors, supervisory board, other management bodies) of legal entities (if yes, then indicate the name, with the exception of subsidiaries of JSC NC QazaqGaz, the management body and the date of joining the management body)

2. I own (in whole or in part), in the form of shares and (or) participation interests in a legal entity (if yes, indicate the name of the legal entity, percentage and (or) share)


3. I carry out activities that are paid on a regular basis: wages, royalties, etc. (if yes, indicate the name of the legal entity that makes payments, with the exception of JSC NC QazaqGaz)

4. I carry out activities that are not paid (if yes, then indicate the role / position and name of the legal entity, with the exception of “NC “QazaqGaz” JSC)

5. I operate as the head of a legal entity (if yes, please indicate the name of the legal entity, BIN)

6. I confirm that persons who are my close relatives, spouse or in-laws, work in the structure of the group, are affiliated persons¹ JSC NC QazaqGaz, their subsidiaries and affiliates (if yes, then indicate the IIN of persons who are close relatives, spouse or relatives, full name,

¹ Affiliated persons are understood as persons in accordance with Article 64 of the Law of the Republic of Kazakhstan dated May 13, 2003 No. 415-II “On Joint Stock Companies”, Article 12-1 of the Law of the Republic of Kazakhstan dated April 22, 1998 No. 220-I “On Limited and Additional Liability Partnerships”.

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 12 from 17

sign of kinship, name of the legal entity in which close relatives work, spouse (wife), relative, position)

7. I confirm that the persons specified in paragraphs 1-6 of this declaration are not counterparties of JSC NC QazaqGaz, their subsidiaries and affiliates (if they are, it is necessary to indicate the IIN, full name, name of the company of the counterparty, BIN of the counterparty, type of activity of the counterparty, the name of JSC NC QazaqGaz, subsidiaries and affiliates to whom services are provided).

8. Other situations or circumstances that lead or may lead to a conflict of interest (if yes, then set out in writing in free form the detailed information necessary and sufficient for a comprehensive consideration and assessment of the situation or circumstances).

9. I hereby confirm full responsibility for the accuracy of the information while filling out this Declaration.

10. I confirm that I have read the terms and conditions of Policies for resolving conflicts of interest of NC QazaqGaz JSC.

11. I undertake to inform JSC NC QazaqGaz in a timely manner in the event of a conflict of interest, as well as changes in the data specified in this declaration.

Signature/ EDS Signature: _____

Date

Annex No. 2

To whom

(position, full name)

From

(full name, position, contact phone number)

NOTIFICATION
on the presence or occurrence of a conflict of interest

Hereby, in accordance with the requirements of the Policy for the settlement of conflicts of interest JSC “NC “QazaqGaz”, I inform you that, in the performance of my official duties, I have a personal interest that leads or may lead to a conflict of interest.

1. Circumstances that are the basis for the emergence of a conflict situation (personal interest):

(describes the situation in which a conflict of interest has arisen or may arise with a detailed justification).

2. Job duties, the performance of which is affected or may be affected by personal interest:

(listing (listing specific job responsibilities).

3. Measures taken (proposed) to prevent or resolve conflicts of interest:


4. List of documents confirming the existence or occurrence of a conflict of interest, as well as the measures taken (proposed to be taken) to prevent and resolve a conflict of interest:

- 1) _____
- 2) _____
- 3) _____
- 4) _____
- 5) _____

Person sending the notice:

« ____ » _____ 20__

(signature / EDS signature, decoding of signature)


 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 15 from 17

Annex No. 3

Situations of conflict of interest

Conflict of interest situations or situations that may give rise to a conflict of interest include the following situations, which are not exhaustive:

1. a situation in which an official, employee of the Company or their close relative, spouse, in-law are a party to a transaction concluded with the Company;
2. a situation in which an official, employee of the Company or their close relative, spouse, in-law is an affiliate of an organization that is a party to a transaction concluded with the Company;
3. any commercial or other interest in transactions, projects related to the Company;
4. a situation in which an official, an employee of the Company or their close relative, spouse, in-laws receive remuneration from third parties in the form of money, other benefits in other forms for the performance by an official or employee of the Company of their professional duties or other services related to the performance by an official or employee of the Company of their professional duties;
5. a situation in which an official, employee of the Company or their close relative, spouse, in-law accepts gifts or services in connection with the performance by an official or employee of the Company of their professional duties from persons who are subordinate at work, with the exception of symbolic signs of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality during protocol and other official events;
6. a situation in which an official, an employee of the Company or their close relative, spouse (wife), in-laws receive from suppliers/potential suppliers personal discounts or other exclusive benefits that are generally not available to other officials, employees of the Company and their close relatives, spouse (wife), in-laws;
7. a situation in which an official or employee of the Company uses the property of the Company for personal purposes, with the exception of cases where it is possible to use the property of the Company, in cases stipulated by the internal documents of the Company;
8. a situation in which an official or employee of the Company discloses confidential information that has become known to him due to the performance of his professional duties, or information, the disclosure of which may have a negative impact on the interests of the Company, as well as any use of confidential information related to the Company for personal gain by an official, employee of the Company or their close relative, spouse, in-law;
9. a situation in which an official or employee of the Company takes part in the discussion or decision-making on the evaluation of his work, reappointment (re-election), payment of remuneration or other issues in relation to himself;
10. a situation in which the Company hires a candidate who is another employee's close relative, spouse, in-law, if any of them will be able to directly influence the performance of official duties and (or) influence promotion and (or) the level of material remuneration in the Company;
11. a situation in which the Company's officials work together with close relatives, spouses and relatives;
12. a situation in which the employees of the Company are directly subordinate or are directly subordinate to close relatives, spouses and (or) in-laws;

 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 2 Id. code: P-15-2023	Conflict of Interest Policy JSC «NC «QazaqGaz»	Page 16 from 17

13.a situation in which an official or employee combines executive and control functions, allowing them to use their official duties for the purpose of obtaining personal gain;

This Policy does not address every possible situation that could lead to a real or perceived conflict of interest.

If a person covered by the Policy is faced with a situation not specified in the Policy, however, he/she has a doubt (suspicion) about the existence of a conflict of interest, he or she should seek advice from the Compliance Service of the Company.