

INFORMATION POLICY
«Samruk-Kazyna Invest» LLP

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1. General provisions

1.1. This Information Policy of "Samruk-Kazyna Invest" LLP (hereinafter - the Policy) is developed in accordance with the current legislation of the Republic of Kazakhstan, Code of Corporate Management of "Samruk-Kazyna" JSC, as well as the Charter of "Samruk-Kazyna Invest" LLP (hereinafter - Partnership).

1.2. The policy defines the basic principles of disclosure of information about the activities of the Partnership to the Sole participant, government agencies of the Republic of Kazakhstan who are interested in the activities of the Partnership to persons and other persons (hereinafter together - the information recipients).

The information recipients of the Partnership include the Sole participant, staff, business partners, the public relations, government agencies:

Government agencies

Government agencies play a regulatory role in the activities of the Partnership, their regulations may affect the activities of the Partnership.

Business partners

Business partners include natural persons and legal entities who are partners in the implementation of investment projects, suppliers (goods, works and services) for the Partnership or consumer products (customers) of the Partnership and its project companies, including evaluation, audit, consulting, insurance companies, banks and other financial institutions. Partnership signs the agreements with business partners, permitting to the Partnership to strengthen the position on the market.

Sole participant

Sole participant makes strategic decisions about the activities and development of the Partnership, controls the activities of its management and participates in the management in the affairs of the Partnership.

Sole participant makes decisions on funding of investment projects of the Partnership.

Public organizations

This is social groups and organizations, the population of regions of the Partnership. They have a significant impact on the information to other recipients of the Partnership. This audience includes the media. They are the main tool of communicating information on the Partnership to all recipients of the information, as well as to the general public. The media influence the image and reputation of the Partnership.

Employees

The Employees of the Partnership are the recipient of information from which the success of operation activity of the Partnership depends directly. This group includes all Employees of the Partnership.

1.3. The purpose of information disclosure on the activities of the Partnership is to provide information to recipients that is necessary for them to take informed decisions and / or actions, and building a clear flow of information between the Partnership and the recipient of the information. Information policy should contribute to the creation of a favorable image of the Partnership by enhancing its information transparency, increase the value of its assets and to attract investment.

In the implementation of information policy the Partnership is based on the fact that one of the main activities of the Partnership is to finance investment projects through the acquisition of shares (share ownership) of the existing or newly established enterprises in various sectors of the economy of the country. Any information about the Partnership, distributed among the recipients of the information, can improve its investment attractiveness, and, on the contrary, interfere with its successful functioning. Management of the Partnership realizes its high social responsibility and supports a constant open dialogue with recipients of information, strengthen corporate reputation, developing information potential of the Partnership in Kazakhstan and abroad.

Partnership is positioned as a law-abiding, open, fair company, respecting human rights and recognizing the principles of sustainable development.

1.4. The main principles of Information Policy of the Partnership are:

- regularity, timeliness and operational efficiency of the provision of information;
- objectivity, completeness, accuracy, reliability and consistency of the information provided;
- equality of rights of recipients of information to receive information based on the standards and requirements established by the legislation, the Code of Corporate Management, the Charter, this Policy and other internal documents of the Partnership;
- maintaining a reasonable balance between the Partnership and the protection of its interests.

1.5. Terms and definitions, used in this Policy:

Official is a Member of the Supervisory Board of the Partnership, the Chief Executive Officer of the Partnership, Managerial employees of the Partnership;

Sole participant is " National Welfare Fund "Samruk-Kazyna" Joint Stock Company;

Interested party is natural persons, legal entities, groups of natural persons, legal entities that affect or can be influenced by the Fund and / or the Partnership, their products or services, and related activities by virtue of the legislation entered into agreements (contracts) or indirectly (not immediately); this definition does not apply to all those who may be unfamiliar with the Fund and the Partnership, or to express an opinion about them; the main representatives of the stakeholders are the shareholders, employees, customers, suppliers, government agencies, subsidiaries, bondholders, creditors, investors, non-governmental organizations, the population of regions in which the activities of the Fund or the Partnership.

Legislation is the legislation of the Republic of Kazakhstan.

Information policy is priorities and standards in the information activities of the Partnership in relation to the recipients of the information.

Confidential information is the information about the Partnership that is not subject to distribution.

Corporate information is the information about the activities of the Partnership, intended for distribution among the recipients of the information.

The bodies of the Partnership are the Sole participant, officials of the Partnership, Inspector General of the **Partnership**.

Employee is a natural person who is employed by the Partnership under the terms of the employment contract;

Disclosure of information is the provision of information on the activities of the Partnership to Recipients of information at intervals that meets the needs of the interested parties in this information and taking into account the best practices of corporate management in the area of disclosure information.

Managerial staff is Deputy Chief Executive Officer, Managing Directors;

Fund is " National Welfare Fund" Samruk-Kazyna " Joint Stock Company.

1.6. Terms used but not defined in this Policy, are used in the sense in which they are used in the legislation, the Charter and other internal documents of the Fund and the Partnership.

2. Implementation of information policy

2.1. For implementation the Information Policy the Partnership:

- keeps records of information (data), whose disclosure is mandatory in accordance with the legislation, the Code of Corporate Management of "Samruk-Kazyna" JSC, the Charter and other internal documents of the Fund and the Partnership;
- determines the list of information (data), disclosed by the Partnership additionally to improve the transparency and openness of the Partnership;
- establishes the procedure for the disclosure of information to recipients of information disclosed by the Partnership mandatory and voluntary;
- determines the list of information (data), constituting official and commercial secrets of the Partnership, the disclosure (transmission, leakage) may prejudice the interests of the Partnership, and establish the necessary measures, the observance of which contributes to the preservation of official and commercial secrets;
- establishes a system of control over the distribution and use of information about the Partnership by identifying ways, forms and procedures for information dissemination, as well as the determination of the persons responsible for the preparation and dissemination of information to be disclosed;
- Determines the competence and responsibility of bodies, Officials and employees of the Partnership to ensure the proper disclosure of the Partnership and the safety of confidential information.

2.2. Within the implementation of the Policy the Partnership uses the following distribution channels of public information:

- 1) public annual report, annual financial statements, brochures, information on major transactions;
- 2) publications, interviews, speaking engagements in the media, at conferences;
- 3) maintenance of the corporate website of the Partnership;

4) provision of information by government agencies of the Republic of Kazakhstan, within the provision of reporting on the activities of the Partnership in accordance with the legislation.

3. Forms and order of disclosure of information

3.1. During the distribution of the information the Partnership uses the following means of communication (forms), including, but not limited to:

1) a written document, prepared by the recipient of the information, including, but not limited to, responding to inquiries, publications (posts) in the media, brochures, reports on the activities of the Partnership, the Partnership materials for Employees;

2) oral communication, including, but not limited to, interviews, press conferences, speaking engagements at meetings and public events inside and outside the Partnership;

3) audio-visual record, including, but not limited to videos, corporate videos, presentations or interviews in radio and television broadcasts, slides and other means of visual representation used at meetings and other public events (conferences) within and outside the Partnership;

4) materials sent (transmitted) on computer media, including, but not limited to, flexible disks, CD-ROM disks, USB device via email.

3.2. Disclosure of information is carried out by the Partnership in the following ways:

1) placement in the media;

2) placement in the Internet on the corporate website of the Partnership at www.skinvest.kz (hereinafter - Corporate website of the Partnership), used for the operative provision of public updated information the general public;

3) distribution of information by corporate mail of the Partnership;

4) meetings with the Recipients of the information.

5) other means provided by Law, Charter, Code of Corporate Management of the Fund and other internal documents of the Fund and the Partnership.

3.3. The information, distributed on the activities of the Partnership, is divided into three groups:

1) the information to be disclosed to the Sole participant;

2) information to be provided on a mandatory and strictly established procedure by the authorized state bodies;

3) information disclosed to Interested parties and other persons.

3.4. Internal corporate media, including data storage media, message boards / stands can only be used for official corporate information, as well as for administrative information.

4. Disclosure of information to the Sole participant

4.1 For protection of the legitimate rights and interests of the Sole participant the sole participant is provided with the following information, including but not limited to:

1) information affecting the interests of the Sole participant;

2) the results of inspections of financial and economic activities of the Partnership;

3) the information on the activities of the Partnership with the right to get acquainted with its financial and other documents including confidential nature;

4) information on the initiation of proceedings in the Court of a corporate dispute. The information about the initiation of proceedings in Court on corporate dispute should be provided by the Sole participant of the Partnership in the manner prescribed by the decision of the Sole participant of the Partnership (unless otherwise provided by the constituent documents), no later than seven working days from the date of receipt by the Partnership appropriate judicial notification or a call in a civil case on corporate dispute;

5) information about significant corporate events. Reports of significant corporate events of the Partnership are:

- information on the reorganization or liquidation of the Partnership;
- information on the amendments to the Charter of the Partnership;
- information on the change of Officers of the Partnership;
- information about choosing the auditing organization of the Partnership.

The moment of occurrence of significant corporate events is:

- information on the reorganization of the Partnership - the date of decision of the authorized state body on state registration of a legal entity established as a result of the merger, accession, division, separation, transformation;
- information on alterations/ amendments to the Charter - the date of decision of the authorized state body on registration of alterations and amendments;
- information about the changing of the Head - the date of decision of the relevant governing body of the appointment of the Head;
- information about the changing of the audit organization of the Partnership - the date of signing of the contract;

Disclosure of information in the form of announcement about the significant corporate events on the basis of resolution of Chief Executive Officer of the Partnership through the publication of a notice of material corporate events on the corporate website of the Partnership within seven (7) working days from the occurrence of significant corporate events. Text of messages on the significant corporate events must be available on the corporate Internet website for at least six months from the date of publication on the Internet;

6) other information and documents after receiving requests from the Sole participant.

5. Disclosure of information to public authorities of the Republic of Kazakhstan

5.1. The Partnership establishes connections with the public authorities, which are aimed at creating favorable to Partnership terms of cooperation, the maintenance of the reputation of the Partnership as a law-abiding and respectful of public interest companies. data communication carried out by targeted information in the first place, the Sole participant, and through the public authorities of the Republic of Kazakhstan.

5.2. The Partnership opens to the public authorities of the Republic of Kazakhstan the information in accordance with the legislation, the Sole participant, the internal documents of the Fund and the Partnership.

5.3. Partnership in a mandatory order provides the disclosure of information to following public authorities, including but not limited to:

- authorized public authority regarding taxation;
- authorized public authority on statistics.

5.4. The Partnership carries out the reporting to public authorities by placing the relevant information on the web-site of the Partnership.

5.5. In accordance with the requests of public authorities in cases stipulated by law, the Partnership provides them with relevant information within its competence. If legislation on the Partnership is not the duty to provide such information, and if the subject of inquiry is beyond the competence of the relevant government agencies, the decision on whether to provide the information requested in each case is taken by the Chief Executive Officer of the Partnership or his Deputy independently. Confidential information is provided by the public authorities, taking into account requirements of the legislation, the Sole participant of the Partnership and internal documents. This Partnership is entitled to demand from the public authorities, which provides information, compliance with obligations under the protection of its confidentiality.

6. The annual financial statements and annual report of the Partnership

6.1. The annual financial statements are subject to prior approval of the Supervisory Board of the Partnership. The final approval of the annual financial statements of the Partnership is made by the Sole participant.

6.2. The annual financial statements must include, unless otherwise stipulated by legislation and internal documents of the Partnership:

- the annual balance sheet;
- a statement, showing changes in equity;
- cash flow statement;
- profits and losses report;
- other information.

6.3. The Partnership allocates an annual report on the Partnership's website as part of continuous improvement disclosure practices. The annual report shall be approved by the Supervisory Board.

The annual report is one of the key sources of information for interested parties. The annual report should be well structured and visually convenient for perception, as well as published in the state, Russian and English languages.

6.4. Annual Report of the Partnership must necessarily contain the following minimum necessary amount of information:

- 1) proclamation of the Chairman of the Supervisory Board;
- 2) proclamation of the Chief Executive Officer of the Partnership;
- 3) information on the Partnership: general information; information about the authorized capital structure, including the following information: the number of participants and the share held by them and ordinary shares (participation interests), the procedure for disposal of property rights; mission; development strategy, the results of its implementation; overview of the market and market position;
- 4) the results of financial and operating activities for the fiscal year: a review and analysis of the activity with respect to the objectives; operational and financial performance; the main significant events and achievements; Information on material transactions; any financial support, including guarantees received / provided by the state and any obligations to the state and society undertaken by the Partnership (if it is not disclosed in accordance with IFRS);
- 5) the structure of assets, including subsidiaries / affiliated organizations at all levels, review the main results of their financial and operational performance;
- 6) the purposes and plans for future periods;

7) the main risk factors and risk management system;

8) Corporate Management: corporate management structure; the shareholders (participants) and ownership structure; the Supervisory Board, including the qualification; the selection process; information about independent directors with an indication of the criteria for determining their independence; report on the activities of the Supervisory Board and its committees; information on corporate management practices according to the principles of the Code of Corporate Management of the Fund approved by the Decree of the Government of the Republic of Kazakhstan on November 5, 2012 № 1403 (as amended on April 15, 2015) and in its non-conformity explanation of the reasons for non-compliance with each of the principles; information about the sole executive body; Report on the activities of the sole executive body; remuneration policy officials;

9) sustainable development (in the case of preparing a separate report on sustainable development, it is possible to provide the link to this report);

10) the conclusion of the auditor and financial statements with notes;

11) analytical indicators and data to be included in the annual report should reflect the comparative analysis and progress (regress) in relation to the previous period (comparison with values of similar items in the last annual report). In order to compare the performance with international companies operating in the same industry, we recommend the publication of performance indicators that will allow the industry to carry out benchmarking analysis.

6.5. The Partnership annually publishes an annual report on its activities.

6.6. Annual Report (welcome speech) is signed by the Chairman of the Supervisory Board and the Chief Executive Officer of the Partnership.

6.7. Issuance and placement of the annual report on the corporate web-site of the Partnership shall be made within thirty calendar days after the approval of the Supervisory Board of the annual report on the activities of the Partnership. Full-term issue and public placement of the Annual Report - is October 1 of the year following the reporting year.

6.8. The annual financial statements are published on the Partnership's website during 120 (one hundred and twenty) days from the end of the reporting period.

7. Disclosure of information to Interested parties and other persons

7.1. The Partnership provides interested and other persons the access to information, affecting the rights and interests of Interested parties in a timely and regular basis in accordance with the legislation, the Charter and other internal documents of the Partnership.

7.2. In case of reorganization (merger, accession, division, separation and transformation) Partnership shall send to all its creditors the written notices on the reorganization and places relevant ads in the media.

7.3. The Employees of the Partnership have the right to receive complete and accurate information on the status of labor and safety conditions. This information, as well as other information relevant to the implementation of an Employee of his functional duties, is brought to the notice of the Employee after the signing of the employment contract in the manner, determined by the internal documents of the Partnership. The

management of the Partnership oversees that Employees of the Partnership to be fully aware and regularly informed on its activities, development of management decisions, the latest corporate developments. To this end, the Partnership organizes special meetings, news reports, provides the obtaining of materials by the staff, relating directly to the staff, speaks at corporate events and in the media, as well as selectively checks the awareness of staff.

7.4. At the request of other organizations that are not public authorities, the Partnership may provide information only with taking into account the restrictions established by the legislation and internal documents of the Fund and the Partnership.

7.5. The procedure of disclosure of information in mutual relations with the Partnership of the audit organization, consulting and appraisal companies, credit rating agencies are determined by legislation, internal documents of the Partnership and the agreements, concluded with those organizations.

7.6. The partnership aims to increase the level of public awareness, the Interested parties about its activities as in Kazakhstan as abroad. It may promote a positive public opinion (favorable image) about the Partnership and confidence on the part of investors and the public community.

7.7. The connections of the Partnership with public community provides the establishment of friendly relations with the population in regions of the Partnership activities, the creation of its positive image, and sustainable reputation.

International media and media in Kazakhstan are an important mediator between the Partnership and the public community. The Partnership prepares and distributes materials for public distribution in the media and using the Internet for the widest possible operational and reporting about its activities.

8. Disclosure of information on Internet Resource – Corporate web-site of the Partnership

8.1. The Sole participant, business partners as well as other interested parties are informed about the activities of the Partnership through the Internet resource, the web site of the Partnership. The Partnership supports on a regular basis and updates the corporate website at: www.skinvest.kz.

8.2. The information and materials are posted on the corporate website in the State, Russian and English languages.

8.3. The Partnership in the prescribed manner formalizes the responsibility of structural units of the Partnership for timely, complete and qualitative renewal of its corporate website.

8.4. Internet resource should be well structured, easy to navigate and accessible to all Interested parties. It is recommended that the information housed in separate thematic sections of an Internet resource.

Updating of Internet resource is carried out as required, but at least once a week.

8.5. The Partnership on a regular basis carries out the control of the completeness and updating of the information posted on the Internet site, as well as the compliance of the information posted on the State, Russian and English versions of the Internet resource. For these purposes, responsible persons should be appointed (a structural unit), who are responsible for the completeness and updating of the information on an Internet resource.

8.6. Internet resource must necessarily contain the following minimum necessary amount of information:

1) general information on the Partnership, including information about the mission, main tasks, objectives and activities, the amount of authorized capital, the amount of assets, net income and the number of personnel;

2) information on the development strategy (at least, the strategic objectives); priority activities;

3) Charter and internal documents, governing the activities of the Partnership;

4) information on Ethic principles;

5) information on risk management;

6) information about the members of the Supervisory Board, including the following information: photo (in consultation with a member of the Supervisory Board), surname, first name, date of birth, citizenship, Supervisory Board member status (independent member, the representative of the Sole Member), specify functions of a Member of the Supervisory Board, including membership in the Committee of the Supervisory Boards or the performance of functions of the Supervisory Board Chairman in other organizations, education, including primary and secondary education (name of the educational institution, year of graduation, qualification, degree), work experience during the last five years, main place of work and others held in the current position, professional qualifications, the date of the first election to the Supervisory Board and the election date of the current Supervisory Board, the number and percentage of shares owned / shares in affiliated companies, the criteria for independent members;

7) Information on the sole executive body-Chief Executive Officer, Managers and Members of the Investment Committee, including the following information: photo, name, surname, patronymic, date of birth, nationality, position and functions, education, including primary and secondary education (name of educational institution, year of graduation, qualification, degree), work experience in the last five years, professional qualifications, positions held concurrently, the number and percentage of shares owned by the affiliated companies;

9) financial statements;

10) annual reports;

11) information on the outside auditor;

12) information on the procurement activities, including the rules, announcements and results of the procurement;

13) information about the authorized capital structure, including the following information: the quantity and par value of issued shares (shares of participation), description of the rights conferred by the shares, the number and par value of authorized but unplaced shares, the shareholders (participants), the quantity and percentage held by them common shares (participation interests), the procedure for disposal of property rights;

14) information on the structure of assets, including information on affiliates of all levels with a brief indication of the scope of their activities;

15) an annual calendar of corporate events (if it is necessary);

16) information about the transactions, where there is an interest, including information about the parties to the transaction, the essential conditions of the transaction (the subject of the transaction, the transaction price), the authority, which approved the decision to approve the transaction;

17) information about major transactions, including information about the parties of the transaction, the essential conditions of the transaction (the subject of the

transaction, the transaction price), the body which adopted the decision about approval of the transaction;

18) information on the activities in the area of sustainable development;

19) news and press releases.

9. Disclosure of information by interacting of the Partnership with the media

9.1. The Partnership may post short press releases, special messages for the media, containing information for publication. Press releases are posted simultaneously on the corporate website of the Partnership on the Internet.

9.2. Press release is transmitted to the media and is posted on the corporate website of the Partnership only after consultation with the Chief Executive Officer of the Partnership and the person, who is responsible for the subject of the news posts.

9.3. Members of the Supervisory Board shall have the right to express their views publicly on the issues, discussed at the meetings of the Supervisory Board, as well as decisions taken at the meeting of the Supervisory Board of the Partnership, taking into account the compliance with the requirements to ensure the safety of the state, official, commercial or other secrets protected by law.

9.4. Chief Executive Officer of the Partnership has the exclusive the right of the public statements on issues related to the activities of the Partnership.

9.5. Chief Executive Officer of the Partnership has the right to delegate to Employees of the Partnership the right to speak publicly (to provide information), on behalf of the Partnership at conferences, meetings, seminars, at meetings of the working groups of state bodies of the Republic of Kazakhstan and other public events, held the country and abroad, participate in press conferences, phone and video conferences, give interviews, to make comments to local and foreign media, financial and investment companies, taking into account the compliance with the requirements to ensure the safety of the state, official, commercial or other secrets protected by the legislation of the Partnership.

Persons, who are not authorized in the prescribed manner to speak publicly on behalf of the Partnership, do not have the right to comment and answers to questions and inquiries concerning the activities of the Partnership. Employees of the Partnership do not have the right to distribute corporate information with a view to its publication, without informing in advance Chief Executive Officer of the Partnership.

10. Protection of confidential information

10.1. The Partnership protects information which has confidential nature, in accordance with the legislation and internal documents of the Fund and the Partnership.

Terms of access to such information, and the ability of its receipt by the Partnership are determined taking into account the necessary balance between the openness of the Partnership and the aspiration not to damage its interests.

11. Responsibility in the area of disclosure of information by Officials and Employees of the Partnership

11.1. Disclosure of information by Officials and Employees of the Partnership is carried out in accordance with legislation, this Policy and other internal documents of the Fund and the Partnership.

11.2. Chief Executive Officer of the Partnership bears the responsibility for the completeness and accuracy of the information disclosed.

Chief Executive Officer and Employees of the Partnership are responsible for the organization and timeliness of information and reporting to the relevant authorities, the accuracy of such information and statements, as well as for providing information on the activities of the Partnership of the Sole participant, creditors, other Interested parties and the media.

11.3. The administrative department is a structural subdivision of the Partnership which is responsible for a set of information to be disclosed.

11.4. In the case of an external request obtaining about the provision of corporate information, Employee within 1 (one) working day must inform about the receipt of such request its Senior employee, who may forward such a request for consideration to the Chief Executive Officer of the Partnership.

11.5. Each case of unauthorized distribution of corporate information for its publication is the basis for an internal service investigation in accordance with the procedure established by the legislation.

11.6. It is not allowed the distribution of information by Employees, that is harmful to the Partnership, containing calls for destructive actions, non-compliance with the decisions and instructions of officials and bodies of the Partnership.

In the case of violation in the process of disclosure of information of legislation, the Charter, this Policy and other internal documents of the Fund and the Partnership, resulted in damage to the Partnership and / or the Sole participant, the guilty persons can be brought to responsibility in accordance with the legislation.

12. Final provisions

12.1. The Supervisory Board of the Partnership is reviewing periodically and continuously improving policy. The initiators of the amendments to the policy is the only party, the Supervisory Board of the Partnership, Chief Executive Officer, as well as other structural units of the Partnership in coordination with the the Chief Executive Officer.

