

## Information for the KazMunaiGas EP JSC Insiders

KazMunaiGas EP JSC («Company») hereby informs Company insiders of the Company's internal documents adopted in compliance with the requirements of Kazakh Law "On the securities market" («Law»).

In this section Company insiders can find information needed for timely and proper performance of their duties stipulated by the Law, which in turn, will ensure compliance with the lawful interests of the Company and its shareholders.

1. The following persons are considered to be Insiders of the Company:
  - 1) persons discharging managerial responsibilities ("PDMR"), employees of the Company that have access to Inside Information by virtue of their position and employment duties;
  - 2) persons that have access to Inside Information due to their ownership, use and/or management, directly or indirectly, of 10 (ten) or more percent of the voting shares of the Company as well as employees of such persons;
  - 3) an audit firm, evaluator, professional participants of a stock exchange and other persons providing services to the Company in accordance with an agreement (including an oral agreement), the provisions of which include disclosure of Inside Information;
  - 4) a trading authority whose list includes the Securities (related financial instruments), issued (offered) by the Company;
  - 5) members of a board of directors of a stock exchange, a listing committee of a stock exchange and an expert committee of a stock exchange that maintains the trading system used for conducting the trading of Securities of the Company and other financial instruments, established for the purpose of recognizing transactions with securities and other financial instruments conducted with the purpose of manipulation;
  - 6) employees of the National Bank of the Republic of Kazakhstan and its departments, government officials with access to the Inside Information due to responsibilities and authority granted to them;
  - 7) non-governmental organisations and professional bodies, whose members include the Company and the organisations listed in items 2), 3) and 4) of this Article that have access to the Inside Information due to the authority granted to them;

8) employees of organisations listed in items 2), 3), 4) and 7) with access to the Inside Information due by virtue of their position and employment duties;

9) persons that received the Insider Information from persons listed in items 1) – 8).

2. Persons listed in items 2) – 4), 7) shall provide the Company with the list of their employees that have access to the Inside Information of the Company by virtue of their position and employment duties no later than 5 (five) Business Days from the day of formation of such list or introduction of amendments thereto.

Persons listed in items 2) – 4), 7) shall provide the Company with the list of their employees that have access to the Inside Information of the Company per request of the Company no later than 5 (five) Business Days from the receipt of the relevant request.

3. Insiders listed in items 2) – 4), 7) must:

1) maintain the list of their employees that have access to the Inside Information of the Company by virtue of their position and employment duties;

2) inform their employees about requirements of the legislation of the Republic of Kazakhstan, this Policy with regard to prohibition of use of the Inside Information.

4. The Insiders are not entitled to:

1) use the Inside Information when entering into transactions with the Securities of the Company (related financial instruments);

2) transfer or make the Inside Information available to the third parties, except for the cases prescribed in the legislation of the Republic of Kazakhstan;

3) provide recommendations to third parties on conclusion of transactions with the Securities of the Company that are based on the Inside Information.

5. In accordance with the requirements of the Law the Company has approved a List of the Inside information.

Information included in the list shall be disclosed with no delay.

The following information may constitute Inside Information:

1) information on events and changes in circumstances that may cause Significant Effect on the Company;

2) information about current or previous performance, including any periodic reports on performance results, and information about changes in expectations of the Company regarding its future performance, including any plans of the Company that may cause Significant Effect on the Company;

3) information about projects and transactions (including acquisitions, exchanges and disposals of stakes or rights to oil and gas assets, establishing or

dissolving joint ventures and consortia, financing and commercial terms of transactions relating to oil and gas assets) and strategic developments at all stages from inception to completion;

6. All PDMRs, their PCAs and Insiders listed in items 1), 2) are prohibited from Trading except during a Trading window that will begin at the open of market on the second Trading Day following the date of public disclosure of the Company's financial results for a particular fiscal quarter or year and will end at the close of market on the last day of the second calendar month of the next fiscal quarter unless otherwise defined in the Company's internal documents.

7. PDMRs, their PCAs and Insiders listed in items 1), 2) are prohibited from Trading during the period of 30 calendar days before the announcement of an interim financial report or a year-end financial report which the Company is obliged to make public according to the internal documents of the Company or the laws of Republic of Kazakhstan (the "Closed Period").

8. No Insider shall disclose Inside Information to any other person where such information may be used by such person to his or her profit by Trading in the Securities of the Company, nor shall such Insider make recommendations or express opinions on the basis of Inside Information as to Trading in the Securities of the Company.

9. Pursuant to Criminal Justice Act 1993 and Financial Services and Markets Act 2000 (including the Disclosure and Transparency Rules and market abuse regime) in the United Kingdom and provisions of legislation of the Republic of Kazakhstan, Insiders may be subject to criminal and/or civil fines and penalties as well as imprisonment for engaging in transactions in the Securities of the Company during the Closed Period (including special Closed Period) or at a time when they have knowledge of Inside Information regarding the Company.

In addition, according to the Kazakh legislation non-compliance with the Law can lead to administrative and criminal responsibility.

Appendix 1 to the Information Disclosure Policy  
 KazMunaiGas Exploration Production JSC

| FCA Handbook/<br>MAR Reference                              | Matter                                                                                                                                                                                      |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Disclosure obligations in relation to PDMR</b>        |                                                                                                                                                                                             |
| <b>1.1 Changes to the board of directors of the Company</b> |                                                                                                                                                                                             |
| LR 9.6.11                                                   | Changes to the board of directors of the Company – notify: without delay or no later than the end of the Business Day following the decision:                                               |
|                                                             | (a) Appointment of new Director, resignation, retirement or removal of existing Director. Must state the effective date of change and also whether executive or non-executive director; and |
|                                                             | (b) Important changes to the role, function or responsibilities of a Director.                                                                                                              |

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| LR 9.6.13                                                                                       | New Directors – notify within 5 (five) Business Days after a decision to appoint:                                                                                                                                                                                                                                                                                                                     |
|                                                                                                 | Public directorships, including details of all directorships held by the Director in any other publicly quoted company at any time in the previous 5 (five) years, indicating whether or not he is still a director, unspent convictions, any bankruptcies, receiverships, liquidations, public criticisms of Director (within 14 (fourteen) days of appointment), details of disqualifications, etc. |
| LR 9.6.14                                                                                       | Changes to Directors' details must be notified as soon as possible.                                                                                                                                                                                                                                                                                                                                   |
| <b>1.2 Share Dealings</b>                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                       |
| MAR 19(1)                                                                                       | Article Persons discharging managerial responsibilities and persons closely associated with them to notify the Company and the FCA of every transaction with any Securities of the Company or its financial and/or debt instruments;                                                                                                                                                                  |
| MAR 19(3)                                                                                       | Article Company to file with the RIS without delay and no later than the end of the Business Day following the receipt of the notification by the Company dealings disclosed to the Company by persons discharging managerial responsibilities and persons closely associated with them.                                                                                                              |
| <b>2. Disclosure obligations in relation to Shareholders and Shareholder Communications</b>     |                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>2.1 Interests of Shareholders</b>                                                            |                                                                                                                                                                                                                                                                                                                                                                                                       |
| DTR 5.8.12R                                                                                     | Notify as soon as possible and no later than the end of the third trading day following a receipt of notification of acquisition or disposal of a major shareholding.                                                                                                                                                                                                                                 |
| <b>2.2 Notification of Shareholder Resolutions</b>                                              |                                                                                                                                                                                                                                                                                                                                                                                                       |
| LR 9.6.18                                                                                       | Notify the RIS as soon as possible after a general meeting of all resolutions passed by the Company other than resolutions concerning ordinary business passed at an AGM.                                                                                                                                                                                                                             |
| DTR 6.1.12R                                                                                     | Provide information to shareholders on time, place and agenda of meetings, total number of shares and voting rights and rights of holders to participate in meetings.                                                                                                                                                                                                                                 |
| DTR 6.1.13R                                                                                     | Publish notice or distribute circular on allocation and payment of dividends and issue of new shares, including information on any arrangements for allotment, subscription, cancellation or conversion.                                                                                                                                                                                              |
| <b>3. Disclosure obligations in relation to the Company Details and Share Capital Structure</b> |                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>3.1 Company Details</b>                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                       |

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| LR 9.2.11                                                                              | Notify the FCA of details of compliance officer(s) in relation to the Company's compliance with the Listing Rules and Disclosure Rules and any amendments to such details.                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                     |
| LR 9.6.19                                                                              | Any name change of the Company must be notified without delay to a RIS (stating the date on which the name change has taken effect) and the FCA in writing.                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                     |
| <b>3.2 Share Capital Structure</b>                                                     |                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                     |
| LR 9.6.4                                                                               | Matters relating to capital structure must be notified as soon as possible covering:                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                     |
|                                                                                        | (1)                                                                                                                                                                                                                                                                                                                                                                                          | Proposed alterations to capital structure including the structuring of the Company's listed debt securities (delay may occur while marketing or underwriting is in progress);                                                                                                       |
|                                                                                        | (3)                                                                                                                                                                                                                                                                                                                                                                                          | Redemption of listed shares including details of the number of the Securities of the Company redeemed and the number of Securities of the Company of that class outstanding following redemption;                                                                                   |
|                                                                                        | (4)                                                                                                                                                                                                                                                                                                                                                                                          | Any extension of time granted for the currency of temporary documents of title; and                                                                                                                                                                                                 |
|                                                                                        | (6)                                                                                                                                                                                                                                                                                                                                                                                          | Results of new issues of equity securities or a public offering of existing equity securities.                                                                                                                                                                                      |
| DTR 6.1.9R                                                                             |                                                                                                                                                                                                                                                                                                                                                                                              | Disclose without delay any change in rights attached to any class of share or derivative issued by the Company giving access to shares.                                                                                                                                             |
| DTR 6.1.12R                                                                            |                                                                                                                                                                                                                                                                                                                                                                                              | Disclose without delay any changes in the rights of holders of securities other than shares, including changes in the terms and conditions of such securities which could indirectly affect those rights, resulting in particular from a change in loan terms or in interest rates. |
| <b>4. Disclosure obligations in relation to Dividends</b>                              |                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                     |
| LR 9.7A.2                                                                              | Notification of any decision by the board to pay or make any dividend or to withhold any dividend or interest payment in listed securities must include details of the exact net amount payable per share, the payment date, the record date (where applicable), and any foreign income dividend election, together with any income tax treated as paid at the lower rate and not repayable. |                                                                                                                                                                                                                                                                                     |
| <b>5. Disclosure obligations in relation to the AGM and Annual Report and Accounts</b> |                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                     |

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| <b>5.1 Annual Report and Accounts</b> |  |
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| DTR 4.1.3 | Annual financial report must be released within 4 months of the end of the financial year. |
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