Conflict of interest management

We take measures to prevent any conflicts of interest, as we recognise their potential impact on decision-making processes. For this purpose, we have implemented a Conflict of Interest Management Policy, which defines the procedure for preventing, identifying and managing conflicts of interest, as well as the procedures for interaction and coordination of the Fund's bodies and/or persons in the event that a conflict of interest arises or is likely to arise. All employees, as well as Directors, are aware of their obligations and responsibilities in relation to conflicts of interest and fully adhere to the Conflict of Interest Management Policy in force in the Fund.

We require our employees and directors to make full and timely disclosure of any actual or potential conflicts of interest. The Board of Directors and the Management Board monitor and seek to address potential conflicts of interest at the officer level.

The Fund has effective monitoring mechanisms in place to ensure compliance with the conflict of interest policy. In the event of a conflict of interest, the Fund has clear procedures in place to allow individuals to recuse themselves from decision-making processes where their personal interests may jeopardise their objectivity. In such a situation, alternative decision-making mechanisms help us to preserve the integrity of the process and prevent conflicts from affecting outcomes.

In 2024, no conflicts of interest were identified in the Fund as a result of a compliance service review.

Openness and transparency

We adhere to the principles of information openness and transparency. We pay great attention to informing our stakeholders about the principles, values of the Fund, disclose information about our activities in accordance with the current legislation of the Republic of Kazakhstan (in particular, the Law of the Republic of Kazakhstan On Joint Stock Companies), as well as the basic principles of information disclosure, which are contained in the Code of Corporate Governance of the Fund and other internal regulatory documents.

GRI 2-29 For wider stakeholder outreach, we disclose information, including by publishing annual reports, sustainable development reports on our official website www.sk.kz. We also publish our news in the media, social networks, including the Fund's Telegram channel @samrukkazynaofficial.

To exercise public control over the activities of the Fund and our portfolio companies, the Public Council continues its work. Each meeting of the Fund's Public Council is covered by the Fund's own information resources, as well as various media are invited, and events are covered both in online publications and on television. A page of the Fund's Public Council has been created on the corporate website, where all recommendations issued by the Council are published.

In addition, we regularly hold press briefings with the Fund's Group CEOs, where they answer questions from the media and the public.

In 2023, the Fund updated the Rules on Disclosure and Preservation of Information of the Fund taking into account the requirements of the legislation of the Republic of Kazakhstan, Listing Rules and Rules of the Kazakhstan Stock Exchange, as well as the best international practices in the field of corporate governance.

The portfolio companies work to improve the quality of non-financial information disclosure and annually publish non-financial reporting: a sustainability report or an integrated annual report. We follow the development of existing and new standards in international practice (SASB, TCFD, GRI, ISRS, CDP) and gradually implement them in the Fund and portfolio companies