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|  | **APPROVED BY**  Resolution of UMP JSC Board of Directors  No.  **8**  dd. “03” 05 2019  **ENDORSED BY**  Minutes of the Meeting of UMP JSC Board  No.  **18/1153**  dd. “19” 03 2019 |

**Information Policy of**

**Ulba Metallurgical Plant JSC**

1. Purpose

General purposes, principles, forms, methods of information disclosure on Ulba Metallurgical Plant JSC (hereinafter referred to as “the Company”) are defined in this Information Policy.

2. Scope of Application

Effect of this Information Policy (hereinafter referred to as – Policy) applies to all types of activities of the Company. The document is obligatory for application by all departments of the Company.

3. General Provisions

3.1. Policy of the Company is developed in accordance with the legislation of the Republic of Kazakhstan, Charter of the Company, Corporate Governance Code of the Company and other internal documents of the Company.

3.2. Procedures of information disclosure within the framework of the Policy implementation is determined by internal documents of the Company.

3.3. This Policy does not regulate relations related to handling of information constituting state secrets of the Republic of Kazakhstan.

3.4. Information security is an integral part of the Policy which is ensured by fulfillment of the following tasks:

- maintaining the integrity of information assets of the Company for the purpose of support the high quality of business processes;

- ensuring the continuity of availability of information assets of the Company for the purpose of its business processes support;

- ensuring confidentiality of information of the Company and other parties when working with information technology.

3.5. Relations related to ensuring the information security of the Company are governed by Information Security Policy of UMP JSC.

3.6. Executive body of the Company – Board of the Company is responsible for Policy implementation.

3.7. List and procedure for insider information disclosure shall be regulated by internal documents of the Company as well as by applicable listing requirements.

3.8. Main definitions:

- interested parties – individuals or legal entities, which are to any extent interested in the Company’s activity: shareholders, investors, partners, mass media representatives, governmental authorities and others;

- confidential information – information which is not related to state secrets, but has real or potential commercial value due to its unknow for the third parties (including information, restriction for distribution of which is dictated by business need), legal free access to which has a limited scope of persons and the Company takes measures to protect its confidentiality;

- insider information – reliable information on securities (derivative financial instruments), transactions with them as well as on the issuer that issued (provided) securities (derivative financial instruments), its activities constituting a trade secret as well as other information not known to the third parties, the disclosure of which may affect the change in the value of securities (derivative financial instruments) and the activities of their issuer;

- bodies of the Company – Sole Shareholder, Board of Directors, Board of the Company;

- providing of comments – providing of answers to oral and written requests from mass media representatives;

- information disclosure – ensuring availability of information to all interested parties regardless of the purpose of obtaining this information in the manner, ways and forms established by the legislation of the Republic of Kazakhstan, Charter of the Company, Corporate Governance Code of the Company and other internal documents of the Company;

- mass media – periodical print publication, tele-, radio channel, film documentation, audiovisual recordings and other forms of periodic or continuous public distribution of mass media, including Internet resources;

- official – member of the Board of Directors, member of the Company’s Board.

4. Information Policy Purposes

4.1. The Company shall disclose information for the following purposes:

- full implementation of the Sole Shareholder rights to receive information in the manner determined by the legislation of the Republic of Kazakhstan and Charter of the Company;

- ensuring transparency of important aspects of the Company’s activity for interested parties;

- confirmation of the Company's readiness to follow standards of good corporate governance;

- development and support of the Company’s positive reputation.

5. Information Policy Principles

5.1. The Company shall be guided by the following principles when implementing the Policy:

- transparency – disclosure of full and reliable information to the Sole Shareholder and other interested parties;

- accessibility – use of information distribution channels by the Company that provide free, easy and least costly access to the disclosed information by the Sole Shareholder and other interested parties;

- information protection – prevention of damage as a result of violation of the procedure for disclosing and (or) transfer of information;

- balance – ensuring the reasonable balance of information disclosure by the Company, on the one hand, and its safety on the other in order to exercise the rights of interested parties to receive information and comply with the Company’s interests;

- consistency – information disclosed by the Company should be consistent with respect to previously disclosed information.

6. Information Policy Implementation

6.1 For the purpose of Policy implementation the Company shall:

- keep a record of information (data) the disclosure of which is mandatory in accordance with requirements of the legislation of the Republic of Kazakhstan, Charter of the Company, Corporate Governance Code and internal documents of the Company;

- establish information disclosure procedure;

- determine list of information comprising confidential information of the Company, disclosure (transfer, leakage) of which may infringe on the Company interests and establish necessary measures in compliance with which contributes to security of confidential information;

- establish system of control over distribution of information about the Company by determining methods, forms and procedures for distribution of information as well as determining persons responsible for preparation and distribution of information to be disclosed;

- define competence and responsibility of the Company's bodies, officials and employees for ensuring proper disclosure of information about the Company and security of confidential information.

- form a single information space in order to ensure necessary conditions for implementation of this Policy that will ensure control of information transmitted through information and communication technologies both within the Company and beyond.

7. Forms and Methods of Information Disclosure

7.1. Disclosure forms shall be chosen by the Company in such a way as to ensure free and reasonably cost-effective access of all interested parties to the disclosed information.

7.2. Information about the Company may be disclosed as follows:

- posting the reports on the Company's Internet resource;

- posting information on the Internet resource of the Depository of financial statements;

- providing comments to the Sole Shareholder of the Company upon his requests;

- publication of information in mass media;

- publication of information in brochures and booklets;

- interviews, press conferences and meetings with stakeholders;

- delivery (transfer) of information (documents) on hard copies;

- provision of access to information (documents) and distribution of copies thereof to the interested persons upon their reasonable and legitimate request;

- other methods as required by the Law of the Republic of Kazakhstan.

8. Right to Disclosure

8.1. Only authorized employees of the Company shall have the right to disclose information and provide comments on behalf of the Company within their competence in accordance with procedure established by this Policy and internal documents of the Company.

8.2. The Company Board Chairman shall have the right to officially comment decisions taken by the Board of Directors and present the views of the Board of Directors on issues considered at meetings of the Board of Directors, subject to compliance with requirements to preserve state, official, commercial or other secrets protected by legislation of the Republic of Kazakhstan and the Company.

8.3. The members of the Board of Directors and its committees shall have the right to publicly express their views on issues considered at meetings of the Board of Directors (committees) as well as on decisions adopted at the meeting of the Board of Directors (committees) subject to compliance with requirements to preserve state, official, commercial or other secrets protected by legislation of the Republic of Kazakhstan and the Company.

8.4 The Company Board Chairman shall have the exclusive right to make public statements on issues related to activities of the Company. The Company Board Chairman may delegate to employees of the Company in the order established by the legislation of the Republic of Kazakhstan and internal documents of the Company, to speak publicly (to provide information) on behalf of the Company.

9. Protection of Confidential Information

9.1. The Company shall ensure protection of confidential information in accordance with legislation requirements of the Republic of Kazakhstan and internal documents of the Company. The conditions of access to such information and availability shall be determined by the Company taking into account the need to maintain balance between openness of the Company and tendency not to harm its interests.

9.2. The list of documents and information constituting commercial secret of Ulba Metallurgical Plant JSC shall be determined by relevant internal document.

9.3. Officials and employees of the Company shall use confidential information only in the interests of the Company and in accordance with this Policy and other internal documents of the Company. The Company counterparties shall use confidential information which has become known to them in accordance with legislation, other normative acts and agreements of the Company.

9.4. In order to ensure use of confidential information by officials, employees and contractors of the Company, the Company shall have the right to introduce special procedures aimed at protecting confidential information from misuse. These procedures shall be introduced for:

- ensuring compliance with procedure for the use of confidential information, including by exception unauthorized access to confidential information and its use by officials and employees of the Company and third parties not in the interests of the Company;

- increasing level of trust to the Company on the part of the Sole Shareholder, investors and partners.

9.5. In case of violation legislation of the Republic of Kazakhstan, the Charter, this Policy and internal documents in the disclosure process that led to damage of the Company, those responsible can be prosecuted in the manner established by legislation.

10. Final Provisions

10.1. Issues not regulated by this Policy shall be governed by the laws of the Republic of Kazakhstan, the Company’s Charter, decisions of the Sole Shareholder, Board of Directors of the Company and internal documents of the Company adopted in accordance with the established procedure.

10.2. If separate provisions of this Policy come into conflict with the Charter of the Company as a result of changes of the current legislation of the Republic of Kazakhstan, this Policy shall be applied in the part which does not conflict with the legislation of the Republic of Kazakhstan and the Company's Charter.