**Financial Settlement Center**

**of Renewable Energy**

Appendix 6

to the decision of the Supervisory Board of FSC of RE LLP

dated November 02, 2022

(Protocol No. 4)

APPROVED

by the decision of the Supervisory Board of FSC of RE LLP

dated November 02, 2022

(Protocol No. 4)

**POLICY**

**ON CONFLICT OF INTEREST SETTLEMENT IN FSC OF RE LLP**

**Astana, 2022**

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 2 of 18** |

**1.** **General provisions**

1. This Policy on the Settlement of conflicts of Interest in the FSC of RE LLP (hereinafter referred to as – Policy and Partnership, respectively) developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, the National Standard of the Republic of Kazakhstan "Anti-corruption Management System", approved by the order of the Chairman of the Committee for Technical Regulation and Metrology dated November 16, 2017 No. 318-od, taking into account the requirements of the International Standard ISO 37001 "Anti-Corruption Management System", the Charter and other internal regulatory documents of the Partnership.

2. The Policy defines the principles, goals, objectives and procedure for identifying and resolving conflicts of interest arising from officials and employees in the course of their official duties, aimed at limiting the influence of private interests, personal interest of officials/employees on their functions, business decisions.

3. The Policy applies to all officials and employees, regardless of the level of the position held and the functions performed.

**2. Basic terms and definitions**

4. The following terms and definitions are used in the Rules:

1) affiliated person of an official/employee – individuals or legal entities (with the exception of state bodies exercising control and supervisory functions within the powers granted to them) who 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 (close relatives, spouse, close relatives of the spouse of the founders, participants of the Partnership, officials or legal entities specified in the sub-paragraphs 1), 4), 5), 6), 7), 8), 9), 10) and 11) paragraph 2 of Article 12-1 of the Law of the Republic of Kazakhstan "On Limited and Additional Liability Partnerships");

2) close relatives – an individual who is closely related to an official or employee (parents (parent), children, adoptive parents (adoptive parents), adopted (adopted), full and half-siblings, grandparents, grandchildren);

3) official – members of the Supervisory Board of the Partnership, its executive body, or a person solely performing the functions of the executive body of the Partnership, as well as a person performing managerial functions in the Partnership (organizational and administrative or administrative and economic functions) and a person authorized to make decisions on the organization and

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 3 of 18** |

conduct of procurement, holding a position not lower than the head of an independent structural divisions in the Partnership;

4) interested parties – individuals, legal entities, groups of individuals or legal entities that influence the Partnership or may be influenced by the Partnership;

5) interests of the Partnership – strategic areas of activity, goals, objectives, performance indicators, expected results of the Partnership;

6) conflict of interest – a situation in which the personal interest of an employee/official affects or may affect the impartial performance of his official duties, in which his personal interests may lead to non-performance and (or) improper performance of his official duties, and (or) entails or may entail a contradiction between such personal interest and legitimate interests Partnership, or the threat of a contradiction that can lead to harm to the legitimate interests and (or) business reputation of the Partnership;

7) personal interest is a material or other interest that affects or may affect the rights and legitimate interests of the Partnership;

8) the bodies of the Partnership – the sole participant, the Supervisory Board, the executive body, the audit commission (auditor) Partnerships;

9) conflict of interest settlement – implementation of a set of procedures aimed at preventing or excluding existing conflicts of interest;

The terms and definitions used, but not defined in the Policy, are used in the meaning in which they are defined in the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership.

**3. Goals and objectives of the Policy**

5. The purpose of the Policy is to ensure a fair, objective and independent decision-making process and to increase their effectiveness in resolving conflicts of interest in the interests of the Partnership.

6. The main objectives of the Policy are:

1) creating conditions for timely prevention, identification and exclusion of causes of conflicts of interest;

2) determination of the procedure for disclosure of information about the conflict of interests and acceptable measures to resolve the conflict of interests;

3) prevention or prevention of a conflict of interest when making decisions by the Partnership bodies and officials;

4) effective conflict of interest resolution.

7. Timely identification of a conflict of interest in the activities of officials/employees is one of the key ways to prevent corruption offenses.

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 4 of 18** |

8. The Partnership understands that officials/ employees may have legitimate personal interests outside the scope of their professional duties in the Partnership, but any conflict of interest between personal interests and official duties in the Partnership must be disclosed and resolved in accordance with the legislation of the Republic of Kazakhstan, the Policy and other internal regulatory documents of the Partnership.

**4. Principles of Conflict of Interest management**

9. The Partnership adheres to the following principles of conflict of interest settlement:

1) priority of the interests of the Partnership – officials and employees put the interests of the Partnership above personal and other interests, the interests of third parties;

2) reasonableness and good faith – officials and employees do not allow conflicts of interest and do not act in their own interests or in the interests of any third parties in relation to issues related to the Partnership;

3) disclosure of information – any conflict of interests with officials and employees that is taking place at the moment or possible in the future (information about the arisen or potential conflict of interests) must be known to the Partnership. Officials/employees immediately and in full notify the anti-corruption compliance service (compliance officer), as well as the immediate supervisor or the superior head of the Partnership about all cases of conflict, including the prerequisites for their occurrence;

4) impartiality – officials and employees refrain from carrying out actions aimed at the realization of personal and other interests that may pose a risk of conflicts and (or) affect the impartial performance of their duties to the Partnership;

5) prudence and honesty – officials and employees are extremely careful in situations involving a conflict of interest, and are clearly aware of their responsibilities and the depth of responsibility

to the Partnership. Officials and employees take the necessary measures in a timely manner to identify and manage conflicts of interest, including immediate notification of the conflict that has occurred;

6) intolerance and internal culture – The Partnership forms a culture and a high degree of intolerance to the occurrence of a conflict of interests in its activities. The Partnership welcomes the disclosure of a possible conflict of interest, develops an internal culture of open communication aimed at understanding the Policy by officials and employees;

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 5 of 18** |

7) personal responsibility and personal example – officials and employees are responsible for late disclosure, as well as for improper settlement of conflicts of interest in favor of the interests of the Partnership.

Officials and employees by their actions serve as a personal example of integrity and ethical behavior, demonstrate commitment to professionalism and strictly comply with the requirements of the legislation of the Republic of Kazakhstan, the Policy and other internal regulatory documents of the Partnership.

Officials and employees participate in identifying risks and shortcomings of the Partnership's internal control system, as well as contribute to compliance with the principles of business ethics regulated by the Partnership's Code of Business Ethics;

8) individual consideration and objectivity – when identifying each and any conflict, it should be considered and resolved individually with an assessment of potential risks for the Partnership. Officials and employees strive to minimize any subjectivity that distorts the real situation of the conflict, including any influence of personal and other interests and various factors on the process and results of conflict of interest research;

9) confidentiality – the Partnership maintains confidentiality of information about the conflict and the processes of its further settlement until the stage of summing up and making a final decision on the situation under consideration (taking into account the requirements established by the legislation of the Republic of Kazakhstan).

The Partnership provides protection of an official/employee from prosecution in connection with a report on a conflict of interest that was disclosed and resolved (prevented) in a timely manner A partnership.

**5. Conflict of interest situations**

10. For the purposes of the Policy, it is necessary to exclude the occurrence of the following situations that may lead to a conflict of interests:

1) in which an official/employee or persons affiliated with him are a party to a contract, project or transaction related to the Partnership;

2) in which an official/employee or an affiliated person has a commercial or other interest in contracts, projects or transactions related to the Partnership;

3) in which an official/employee or an affiliated person competes with the Partnership in terms of providing services, concluding a contract, implementing a project or a transaction with a third party;

4) in which an official/employee or their close relative is an affiliated person or owns shares (participation shares) in an organization that is a party to an

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 6 of 18** |

agreement, project or transaction related to the Partnership in aggregate together with its affiliated persons;

5) in which an official of the executive body of the Partnership, as well as his spouse, close relatives carry out entrepreneurial activities competing with the activities of the Partnership;

6) in which an official/ employee or their close relatives receive remuneration in the form of money, gifts, services or in other forms for the performance by an official or employee of their official duties from third parties;

7) in which an official/ employee or their close relatives receive from contractors (suppliers, borrowers, customers and others) Partnerships personal discounts or other exceptional benefits that would not be available to them in a general manner;

8) in which an official/employee uses the resources, intellectual property and equipment of the Partnership (including corporate mail and computer programs) for personal purposes or in any other activity not related to the Partnership;

9) in which an official/ employee discloses confidential information that has become known to him due to the performance of his official duties, or information whose disclosure may have a negative impact on the interests of the Partnership, and also uses confidential information related to the Partnership for personal gain;

10) in which an official/employee takes part in making decisions on the evaluation of his work, reassignment (re-election), remuneration or other issues in relation to himself;

11) in which an official/employee takes part in determining suppliers of goods, works and services that are managed and/or owned by their close relatives;

12) in which an official / employee has a personal interest in the performance of official duties, which leads or may lead to a conflict of interest when hiring, transferring to a new position.

11. The situations listed in paragraph 10 of the Policy are not exhaustive (an approximate overview of typical situations of conflict of interest and possible ways to resolve it is given in Annex 1 to the Policy).

**6. Causes of conflict of interest**

12. A conflict of interests may arise between bodies, officials, employees as a result of:

1) non-compliance (violation of requirements) with the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership;

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 7 of 18** |

2) the presence of financial interests in another company with which the Partnership maintains business relations;

3) part-time work as a manager or other official in another company in direct competition with the activities of the Partnership;

4) providing business opportunities to other companies to the detriment of the interests of the Partnership due to personal interests;

5) non-compliance by the Partnership, its officials and employees with the principle of priority of the interests of the Partnership;

6) interference of personal interests in the official duty, as well as actions that intentionally lead to improper benefits of the employee or official.

**7. Prevention of conflicts of interest**

13. One of the effective mechanisms for observing the interests of the Partnership, as well as protecting its property interests and business reputation, is the prevention and settlement of conflicts of interest.

14. The Partnership, by organizing the acceptance and timely consideration of complaints and proposals of the Only Participant who has claims against the Partnership, will strive to resolve all disputed issues in a pre-trial manner.

15. Officials and employees perform their official duties in good faith and reasonably in the interests of the Partnership, avoiding conflicts of interest.

16. Officials and employees ensure full compliance of their activities with the requirements of the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership, decisions of the Sole Participant of the Partnership and generally accepted standards of business ethics.

17. In case of occurrence or in order to prevent a conflict of interests, officials and employees ensure the fullest and fastest identification of the causes of the conflict and clear coordination of their actions, namely:

1) ensure the identification of conflicts of interest at the earliest stages of their development and increased attention to them by officials and employees, including through the annual signing of a declaration of conflict of interest in accordance with the requirements of the Anti-Corruption Policy in the FSC of RE LLP;

2) determine their position on the merits of the conflict as soon as possible, make an appropriate decision and bring it to the attention of the higher body of the Partnership.

18. In order to prevent a conflict of interests, bodies, officials and employees must:

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 8 of 18** |

1) comply with the requirements of the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership;

2) refrain from taking actions and making decisions that may lead to a conflict of interest; 3) exclude the possibility of involvement of the Partnership in the implementation of illegal activities;

4) to ensure the maximum possible effectiveness in the implementation of its activities;

5) exercise internal and external control in accordance with the Charter and other internal regulatory documents of the Partnership;

6) carry out checks of the terms of transactions during the internal and external audit of the Partnership;

7) to ensure that information about affiliated persons of the Partnership and officials is taken into account, assigning this duty to the responsible person / structural unit by issuing an appropriate order;

8) ensure the provision of information about the affiliated persons of the Partnership and its officials;

9) ensure compliance with the procedure established by law for transactions with affiliated persons of the Partnership;

10) to disclose information about the activities of the Partnership in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership;

11) ensure the reliability of accounting statements and other information provided to the Sole Participant of the Partnership, interested parties and state bodies in accordance with the procedure established by law and the Charter;

12) develop and improve measures to prevent the use of information available in the Partnership for personal purposes by persons who have access to such information;

13) participate in the identification of risks and shortcomings of the Partnership's internal control system;

14) promote compliance with the principles of business ethics;

15) observe the rights of the Sole Participant enshrined in the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership.

19. In order to prevent conflicts of interest, officials and employees must:

1) observe the norms of business communication and the principles of business ethics;

2) promptly inform a higher official about the occurrence of circumstances that contribute to the emergence of a conflict situation;

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 9 of 18** |

3) notify a higher official in writing about the organization in which the official and affiliated persons have a financial interest, and with which the Partnership conducts or intends to conduct commercial activities;

4) refrain from any activity that directly affects the relationship between the Partnership and the company in which the official and affiliated persons have a financial interest;

5) inform a higher official or body in advance of his intention to work part-time in another company and provide information confirming that the proposed work does not contradict the interests of the Partnership and is not an entrepreneurial activity competing with the activities of the Partnership.

**8. The procedure for the work of the Partnership's organs for the settlement of conflicts of interest**

20. Officials and employees, in order to prevent a conflict of interest, are obliged to prevent or avoid any actions, relationships or situations, including those provided for in paragraph 10 of the Policy, that could potentially cause a conflict of interest.

21. Officials and employees are prohibited from:

1) conclude transactions with the Partnership aimed at obtaining property benefits from it (including gift agreements, gratuitous use and others);

2) receive commission both from the Partnership itself and from third parties for transactions concluded by the Partnership with third parties;

3) act on behalf of or in the interests of third parties in their relations with the Partnership. The Charter and other internal regulatory documents of the Partnership may provide for other prohibitions for officials and employees.

22. Officials/employees, within 3 (three) working days from the moment of occurrence or detection of a conflict of interest, are obliged to inform their direct supervisor or a superior manager of the Partnership about any commercial or other interest (direct or indirect) in transactions, contracts, projects related to the Partnership, as well as about the emergence of personal interest in the execution of job responsibilities that lead or may lead to a conflict of interest.

23. A statement on the existence of a conflict of interest or a situation that may lead to a conflict of interest (hereinafter referred to as the Statement), with the provision of information specified in paragraph 22 of the Policy, is made in writing in any form or according to the recommended model according to Annex 2 to the Policy, addressed to the General Director and/or the Chairman of the

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 10 of 18** |

Supervisory Board of the Partnership and it is provided to the anti-corruption compliance service (compliance officer).

The Application may be accompanied by additional materials confirming the fact that officials/ employees are interested, which leads or may lead to a conflict of interests, as well as materials confirming the measures taken to prevent or resolve the conflict of interests.

If the Application cannot be submitted in person, it is provided by e-mail with a notification of delivery.

24. The Anti-Corruption Compliance Service (compliance officer), on the day of receipt of the Application, registers it in the register of applications for the presence of a conflict of interest or a situation that may lead to a conflict of interest (hereinafter referred to as the Journal), compiled according to the recommended sample according to Annex 3 to the Policy, the sheets of which are stitched, numbered and stamped by the Partnership.

A copy of the Application for its registration is issued to the official /employee by hand under the signature in the journal or sent to him by mail with a notification of delivery.

25. After registration of the Application in the Journal anti-corruption compliance service (compliance officer) no later than three working days following the day of registration of the Application, ensures that it is sent to the General Director and/or the Chairman of the Supervisory Board for submission to the Supervisory Board of the Partnership in accordance with its competence before the relevant authorized body makes a decision on the issues specified in paragraph 22 of the Policy.

**9. Ways to resolve conflicts of interest**

26. The consideration of the information provided by the Partnership body and the settlement of the conflict of interests takes place confidentially. The received information is carefully checked in order to assess the seriousness of the risks arising for the Partnership and to choose the most appropriate form of conflict of interest settlement.

27. The organs of the Partnership may come to the conclusion that the situation, information about which was provided by an official / employee, is not a conflict of interest and, as a result, does not need special methods of settlement.

28. The organs of the Partnership may also come to the conclusion that there is a conflict of interest and use various ways to resolve it, including by:

1) restrictions on the access of an official/employee to specific information that may affect his personal interests;

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 11 of 18** |

2) removal of an official/employee (permanent or temporary) from participating in the discussion and decision-making process on issues that are or may be influenced by a conflict of interest;

3) revision and modification of the employee's functional responsibilities; 4) transfer of an employee to a position providing for the performance of functional duties not related to a conflict of interests, in accordance with the requirements of the labor legislation of the Republic of Kazakhstan;

5) transfer by an official/employee of the property belonging to him, which is the basis for the occurrence of a conflict of interests, to trust management;

6) refusal of an official/employee from his personal interest, generating a conflict with the interests of the Partnership;

7) termination of powers/dismissal of an official/employee at the initiative of an official/employee.

The above list of ways to resolve conflicts of interest is not exhaustive. In each specific case, other ways of its settlement may be used.

When deciding on the choice of a specific method of resolving a conflict of interests, the circumstances of a specific conflict of interests are taken into account and to the greatest extent ensure the exclusion of either personal interest or its impact on the proper, objective and impartial performance by an official/employee of their official duties.

29. When resolving an existing conflict of interest, the most "soft" settlement measure possible should be chosen, taking into account the existing circumstances.

Tougher measures should be used only if it is caused by a real need or if more "soft" measures have not been effective enough.

**10. Responsibility**

30. If violations of the requirements of the legislation of the Republic of Kazakhstan, the Charter, Policy and other internal regulatory documents of the Partnership are committed in the work on the prevention or settlement of a conflict of interests, which led to damage to the Partnership and (or) its Sole Participant, the persons guilty of such violation are held liable in accordance with the legislation of the Republic of Kazakhstan.

31. For non-compliance with the Policy, an official/ employee, where applicable, may be brought to disciplinary responsibility, as well as to other types of liability in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan.

32. For failure by an official to take measures to prevent or resolve a conflict of interests to which he is a party, an employment contract may be

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 12 of 18** |

terminated with him in accordance with articles 52 and 143-1 of the Labor Code of the Republic of Kazakhstan.

33. The anti-corruption Compliance Service (compliance Officer) monitors the execution of decisions of the Partnership's conflict resolution bodies.

**11. Final provisions**

34. If it is impossible to resolve conflicts by taking measures provided for by the Policy, they are resolved in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

35. Issues not regulated by the Policy are regulated by the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 13 of 18** |

Appendix 1 to the Policy

on Conflict of Interest Settlement in FSC of RE LLP

**Overview of typical conflict of interest situations**

1. An official/employee, in the course of performing his/her official duties, participates in making decisions that may bring material or non-material benefits to persons who are his/her spouse/ close relatives or other persons with whom his/her interest is related.

Possible ways of settlement: removal of an official/employee from making a decision that is the subject of a conflict of interest.

2. An official/ employee participates in making personnel decisions in relation to persons who are his close relatives or other persons with whom his personal interest is connected.

Possible ways of settlement: removal of an official/ employee from making a decision that is the subject of a conflict of interest; transfer of an employee (his subordinate) to another position or change of his official duties.

3. An official/ employee or other person with whom the personal interest of an official/ employee of the Partnership is connected, performs or intends to perform paid work in another organization that has business relations with the Partnership, intends to establish such relations or is its competitor.

Possible ways of settlement: removal of an official/employee from making a decision that is the subject of a conflict of interest; recommendation of an official/employee to refuse to perform other paid work.

4. An official/employee makes a decision on the purchase by the Partnership of goods that are the results of intellectual activity to which he or another person with whom his personal interest is connected has exclusive rights.

Possible ways of settlement: removal of an official/employee from making a decision that is the subject of a conflict of interest.

5. An official/ employee or other person with whom his personal interest is connected receives material benefits or services from another organization that has business relations with the Partnership, intends to establish such relations or is its competitor.

Possible ways of settlement: removal of an official/employee from making a decision that is the subject of a conflict of interest; change in the employee's work responsibilities; recommendation to the official/ employee to refuse the goods or services provided.

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 14 of 18** |

6. An official/ employee or other person with whom his personal interest is connected receives expensive gifts from his subordinate or other official/ employee in respect of whom he performs control functions.

Possible ways of settlement: recommendation to an official/ employee to return an expensive gift to the donor; termination of employment relations with an official/ employee (his subordinate) and taking measures in accordance with the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy in the FSC of RE LLP.

7. An official/ employee uses information that has become known to him during the performance of his official duties to obtain benefits or competitive advantages when making commercial transactions for himself or another person with whom the employee's personal interest is connected.

Possible ways of settlement: termination of employment relations with an official/employee.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 15of 18** |

Appendix 2

to the Policy on Conflict of Interest Settlement

in FSC of RE LLP

Form

Whom: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

from whom:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Statement of a conflict of interest or a situation that may lead to a conflict of interest**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(Full name, Position)*

hereby inform you that I have a personal interest in the performance of my official duties, which leads or may lead to a conflict of interests.

Circumstances that are the basis for the emergence of personal interest:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Job responsibilities, the performance of which is influenced or may be influenced by personal interest \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Proposed (adopted) measures to prevent or resolve conflicts of interest:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Additional information (if available):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(applicant's signature)* \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(date)*

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 16 of 18** |

Appendix

3 to the Policy on Conflict

of Interest Settlement

in FSC of RE LLP

Form

**Journal**

**of registration of statements about the presence of a conflict of interest or a situation that may lead to a conflict of interest**

\_\_\_\_\_\_\_\_\_ FSC of RE LLP\_\_\_\_\_\_\_\_\_\_

*(name of the organization)*

started: «\_\_» \_\_\_\_\_\_\_ 20\_\_ г. finished: «\_\_» \_\_\_\_\_ 20\_\_ г.

Magazine page

|  |  |  |  |
| --- | --- | --- | --- |
| № and date of registration of the application | Information about the employee who submitted the Application (full name, position, phone number) | Full name, signature of the person who accepted the Application | Signature of the Applicant on handing him a copy of the Application |
|  |  |  |  |
|  |  |  |  |

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 17 of 18** |

**Approval Sheet**

|  |  |  |  |
| --- | --- | --- | --- |
| **Post** | **Full name** | **Date** | **Signature** |
| General Director | Nalibayeva G.K. |  |  |
| Director of the Department of Legal Support and Administrative Support | Baktygalieva E.V. |  |  |
| Compliance Officer  Anti-Corruption  Compliance Service | Mukusheva M.Sh. |  |  |

|  |  |  |
| --- | --- | --- |
| **Financial Settlement Center**  **of Renewable Energy** | **Policy on Conflict of Interest settlement**  **in FSC of RE LLP** | |
| **revision 1** | **page 18 of 18** |

**The List of Familiarization**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **№** | **Post** | **Full name** | **Date**  **of acquaintance** | **Signature** |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |