**QUESTIONNAIRE**

**for the Exchange clients on issues of internal control organization**

**in terms of ensuring compliance with the international economic sanctions regime**

|  |  |
| --- | --- |
| Full name of the Exchange client (hereinafter, the Organization): |  |
|  |  |
| BIN (Business Identification Number) or registration number: |  |

|  |  |
| --- | --- |
| Legal address: |  |

**INFORMATION ON THE MEASURES TAKEN BY THE ORGANIZATION TO COMPLY WITH THE INTERNATIONAL ECONOMIC SANCTIONS REGIME**

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| --- |
| 1. Does the Organization have policies and procedures for compliance with international economic sanctions? |
| |  |  | | --- | --- | | Yes | No |  |  |  |  | | --- | --- | --- | | Name of internal document | Date of approval and last update | The body that approved the internal document | |  | **/** |  | |  | **/** |  | |  | **/** |  | |
| If "yes", please list the internal documents with details |
| 2. Brief description of the process of compliance with international economic sanctions in the Organization: |
|  |
|  |
| 3. Is the Organization and/or its shareholders/founders and/or its executives and/or officials and/or beneficiary owners currently under the US, EU, UK and/or other applicable sanctions? |
| |  |  | | --- | --- | | Yes | No |  |  |  |  | | --- | --- | --- | | Full name/Name | What sanctions lists are they on | Date of inclusion | |  |  |  | |  |  |  | |  |  |  | |
| If yes, please fill in the table. |
| 4. Does the Organization check its clients, including information on beneficial owners, during the establishment/continuation of business relations for presence in sanctions lists? |
| |  |  | | --- | --- | | Yes | No | |
| Please select answer |
| 4a. What method is used to check the Organization's clients against sanctions lists? |
| |  |  |  | | --- | --- | --- | | Automatically | Manually | ☐ Combined | | The information system used for checking \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | | | |
| Please specify the method and system used for checking |
| 4b. Select the sanctions lists used by the Organization during checking for sanctions and/or other restrictions: |
| |  |  |  |  |  | | --- | --- | --- | --- | --- | | UN Security Council's Consolidated Sanctions List | List of the US Treasury Department's Office of Foreign Assets Control (OFAC) | ☐ List of the UK Office of Financial Sanctions Implementation (OFSI) | ☐ Consolidated list of the European Union (EU) | ☐ Other:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| Please select the used sanctions lists |
| 5. Among the Organization's clients, are there clients included in the sanctions lists of USA, EU and UK? |
| |  |  | | --- | --- | | Yes | No | | Share of total number of clients (%): \_\_\_ | |  |  |  | | --- | --- | | Operations carried out by sanctioned persons | Share of total volume of transactions of all clients for the last reporting year (%) | | Transfer operations:  incoming  outgoing |  | | Bank lending operations |  | | Operations on the securities market:  purchase  sale |  | | Insurance |  | | Exchange/cash transactions |  | | Other services and operations |  | |
| If "yes", please indicate the number and share of the total number of clients, as well as the volume of their transactions over the past 12 months. |
| 6. Among the Organization's clients, are there clients operating in the technology, defense and related industries, such as material support, construction, aerospace or manufacturing industries of the Russian economy or other sectors of the economy that can be defined as supporting the military-industrial complex of the Russian Federation? |
| |  |  |  | | --- | --- | --- | | Yes | No | Share of total number of clients (%): \_\_\_ |  |  |  | | --- | --- | | Transactions carried out by certain clients of the Organization | Share of total volume of transactions of all clients for the last reporting year (%) | | Transfer operations:  incoming  outgoing |  | | Bank lending operations |  | | Operations on the securities market:  purchase  sale |  | | Insurance |  | | Other services and operations |  | |
| If "yes", please indicate the number and share of the total number of clients, as well as the volume of their transactions over the past 12 months. |
| 7. Does the Organization directly and/or indirectly facilitate the sale, supply or transfer of certain goods[[1]](#footnote-1) and prohibited goods[[2]](#footnote-2) to Russian importers or companies supplying these goods to the Russian Federation? |
| |  |  |  | | --- | --- | --- | | Yes | No | Share of total export transactions (%): \_\_\_\_\_ | |
| If "yes", please indicate the number and share of the total volume over the past 12 months. |
| 8. Does the Organization have training programs for its employees on compliance with international economic sanctions? |
| |  |  |  | | --- | --- | --- | | Yes | No | Date of last training \_\_\_\_\_\_\_\_\_\_ | |
| Please answer "yes" or "no". If "yes", please indicate the date of the last training. |
| 9. Does the Organization regularly evaluate the efficiency of its internal control policies and programs for compliance with international economic sanctions by means of an internal audit unit or an external auditor? |
| |  |  | | --- | --- | | Yes | No |   \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| If yes, please provide brief information on the date of the last audit and significant recommendations. |
| 10. Has the Organization appointed an employee responsible for compliance with international economic sanctions? |
| |  |  |  |  | | --- | --- | --- | --- | | Full name: |  |  |  | | Position: |  |  |  | | Telephone: |  |  |  | | Email address: |  |  |  | |
| If “yes”, please indicate the full name, position, contact phone numbers and email address of the responsible employee. |

**We hereby confirm that the information contained in the Questionnaire is complete and accurate as of the date specified below.**

**We hereby undertake to immediately notify Kazakhstan Stock Exchange JSC in the event of any changes in the information specified in the Questionnaire.**

[Position of the top executive/their substitute] [signature] [Last name, initials]

Seal [Date of Signing]

1. The list of goods determined pursuant to Section 11(a)(ii) of the US President's Executive Order 14024 dated April 15, 2021 (link: <https://ofac.treasury.gov/media/932446/download?inline>). [↑](#footnote-ref-1)
2. Dual-use goods that cannot be exported from the EU to the Russian Federation according to Regulation (EU) 2021/821 of the European Parliament and of the EU Council dated May 20, 2021, and prohibited goods under the UK Russia (Sanctions) (EU Exit) Regulations 2019. [↑](#footnote-ref-2)