**QUESTIONNAIRE**

**of the Exchange's client on issues of organizing internal control**

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

|  |  |
| --- | --- |
| Full name of the Exchange's client (hereinafter referred to as the Organization): |  |
|  |  |
| BIN (business identification number) or registration number: |  |

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

**INFORMATION ABOUT MEASURES BEING TAKEN BY THE ORGANIZATION TO COMPLY WITH THE REGIME OF INTERNATIONAL ECONOMIC SANCTIONS**

|  |
| --- |
| 1. Has the Organization developed policies and procedures to comply with international economic sanctions? |
| |  |  | | --- | --- | | Yes | No |  |  |  |  | | --- | --- | --- | | Name of the internal document | Date of approval and last update | Body that approved the internal document | |  | **/** |  | |  | **/** |  | |  | **/** |  | |
| If "yes" – list internal documents indicating details |
| 2. Brief description of the process of compliance with international economic sanctions in the Organization: |
|  |
|  |
| 3. Are the Organization and/or shareholders/founders, and/or its executives, and/or officers, and/or beneficial owners subject to US, EU, UK sanctions and/or other applicable laws? |
| |  |  | | --- | --- | | Yes | No |  |  |  |  | | --- | --- | --- | | Full name/name | What sanctions lists are they on? | Date included | |  |  |  | |  |  |  | |  |  |  | |
| If yes, fill out the table. |
| 4. Does the Organization screen its clients, including information about beneficial owners, during the establishment/continuation of business relationships for presence on sanctions lists? |
| |  |  | | --- | --- | | Yes | No | |
| Select answer |
| 4a. What method is used to check the Organization's clients against sanctions lists? |
| |  |  |  | | --- | --- | --- | | Automatically | Manually | ☐ Combined | | Information system used for verification \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | | | |
| Specify the method and system used for verification |
| 4b. Select the sanctions lists used by the Organization in its screening processes for sanctions and/or other restrictions: |
| |  |  |  |  |  | | --- | --- | --- | --- | --- | | Consolidated sanctions list of the UN Security Council | U.S. Treasury Department's Office of Foreign Assets Control (OFAC) List | ☐ UK Financial Sanctions Enforcement (OFSI) List | ☐ Consolidated list of the European Union (EU) | ☐ Others:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| Select the relevant sanctions lists |
| 5. Are there organizations among the clients included in the sanctions lists of the US, EU and UK? |
| |  |  | | --- | --- | | Yes | No | | Share in the total number of clients (%): \_\_\_ | |  |  |  | | --- | --- | | Operations carried out by sanctioned persons | Share in the total volume of transactions of all clients for the last reporting year (%) | | Transfer operations:  incoming  outgoing |  | | Banking borrowing operations |  | | Transactions on the securities market:  purchase  sale |  | | Insurance |  | | Forex/cash transactions |  | | Other services and transactions |  | |
| If "yes," indicate the number and share in the total number of clients, as well as the volume of their transactions over the past 12 months. |
| 6. Are there organizations among the clients operating in the technology, defense and related industries, such as logistics, construction, aerospace or manufacturing sectors of the Russian economy or other sectors of the economy that can be identified as supporting the military-industrial complex of the Russian Federation ? |
| |  |  |  | | --- | --- | --- | | Yes | No | Share in the total number of clients (%): \_\_\_ |  |  |  | | --- | --- | | Transactions carried out by certain clients of the Organization | Share in the total volume of transactions of all clients for the last reporting year (%) | | Transfer operations:  incoming  outgoing |  | | Banking borrowing operations |  | | Transactions on the securities market:  purchase  sale |  | | Insurance |  | | Other services and transactions |  | |
| If "yes," indicate the number and share in 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 exports (%): \_\_\_\_\_ | |
| If "yes," indicate the quantity and share in the total volume for the last 12 months. |
| 8. Does the Organization have training programs for its employees on compliance with international economic sanctions? |
| |  |  |  | | --- | --- | --- | | Yes | No | Date of last training \_\_\_\_\_\_\_\_\_\_ | |
| Answer "yes" or "no". If "yes" – indicate the date of the last training |
| 9. Does the Organization regularly evaluate the effectiveness of internal control policies and programs for compliance with international economic sanctions by the internal audit function or external auditor? |
| |  |  | | --- | --- | | Yes | No |   \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| If yes, then provide a summary of 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: |  |  |  | | E-mail address: |  |  |  | |
| If "yes," please indicate the last name, first name and patronymic (if available), position, contact phone numbers and e-mail address of the responsible employee. |

**We hereby confirm that the information contained in the Application Form is complete and accurate as of the date indicated below.**

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

[Position of the chief executive/person replacing him] [signature] [Last name, initials]

Seal impression [Date of signing]

1. List of items identified pursuant to Section 11(a)(ii) of 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 Council of May 20, 2021 and prohibited goods under the UK Russia (Sanctions) (EU Exit) Regulations 2019. [↑](#footnote-ref-2)