

Annex _____
to the minutes of the meeting of the
Board of Directors Qazaqstan
Investment Corporation JSC
dated _____ 2024
Minutes No. _____

Approved by
the resolution of the Board of Directors of
Qazaqstan Investment Corporation JSC
dated _____ "_____" 2024
Minutes No. _____

**Information policy of Qazaqstan Investment Corporation joint-
stock company**

Astana, 2024

Content

Section 1. General provisions	3
Section 2. Terms, definitions and abbreviations	3
Section 3. Goals and principles	4
Section 4. Communicative means of information dissemination	4
Section 5. Ways of information dissemination	5
Chapter 5.1. Providing information at the request of individuals and legal entities	5
Chapter 5.2. Provision (dissemination) of information in the media, holding press conferences and briefings with the media	7
§ 5.2.1. Official reports	7
§ 5.2.2. Providing answers to media inquiries that are not included in official communications	8
§ 5.2.3. Holding press conferences and briefings with the media	8
Chapter 5.3. Posting information on the Company's Internet resource	9
Chapter 5.4. Posting information on the official pages of the Company on social networks and (or) other internal Internet resources of the Company	11
Chapter 5.5. Placement of information in the premises occupied by the owners of the information	12
Chapter 5.6. Sharing information on the e-government web portal	12
Chapter 5.7. Posting information on the Internet resource of the financial reporting depository	13
Chapter 5.8. Posting information on the Internet resource of the stock exchange	13
Section 6. Interaction with Information Recipients	13
Chapter 6.1. Disclosure of information to the Sole Shareholder of the Company	13
Chapter 6.2. Disclosure of information to the Board of Directors of the Company	13
Chapter 6.3. Disclosure of information to the state bodies of the Republic of Kazakhstan	14
Chapter 6.4. Disclosure of information to investors and partners	14
Chapter 6.5. Disclosure of information to interested and other persons	15
Section 7. Disclosure of public information about the Company's activities	15
Section 8. Disclosure of preliminary information	16
Section 9. Disclosure of information by authorized bodies, officials and employees of the Company	17
Section 10. Responsibility	18
Section 11. Final provisions	18

Section 1. General provisions

1. This Information Policy of Qazaqstan Investment Corporation Joint Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Company's Charter and internal regulatory documents regulating the Company's activities.

2. The Policy is an internal regulatory document of the Company that establishes the basic principles of information disclosure and a list of information to be disclosed.

Section 2. Terms, definitions and abbreviations

3. The following terms, definitions and abbreviations are used in the Policy:

1) **Company** – Qazaqstan Investment Corporation Joint Stock company;

1) **Sole shareholder** - Baiterek National Managing Holding Joint-Stock Company;

3) **official** - a member of the Board of Directors of the Company, a member of the Management Board of the Company;

4) **institutional investor** – a legal entity investing the money attracted by it in securities and other financial instruments in accordance with the legislation of the Republic of Kazakhstan;

5) **corporate events** – events that have a significant impact on the Company's activities, affecting the interests of the Sole Shareholder and investors of the Company, as defined by the legislation of the Republic of Kazakhstan;

11) **partners** - suppliers and contractors, partners in joint projects;

7) **sustainable development** – development in which the Company and its subsidiaries manage the impact of their activities on the environment, economy, society and make decisions taking into account the interests of stakeholders. Sustainable development shall meet the needs of the current generation without depriving future generations of the opportunity to meet their needs;

8) **insider information** – reliable information about securities (derivative financial instruments), transactions with them, as well as about the Company as an issuer that issued (provided) securities (derivative financial instruments), its activities that constitute a trade secret, as well as other information unknown to third parties, the disclosure of which may influence the change in the value of securities (derivative financial instruments) and the Company's activities. Information is insider information from the moment of its occurrence until its disclosure to an unlimited number of persons in accordance with the legislation of the Republic of Kazakhstan;

9) **press releases** – short special messages for the media containing information for publications;

10) **IFRS** – International Financial Reporting Standards;

11) **mass media (mass media)** – periodical print edition, TV and radio channel, online edition;

12) **Stock exchange** – Kazakhstan Stock Exchange (KASE).

The terms used, but not defined in the Policy, are used in the sense in which they are applied in the legislation of the Republic of Kazakhstan, internal regulatory documents of the Company.

Section 3. Goals and principles

4. The main objectives of the Policy are:

1) the development of relationships between information holders and stakeholders regarding the receipt and dissemination of information;

2) timely provision to the Sole Shareholder, the Board of Directors of the Company, state bodies of the Republic of Kazakhstan, interested parties in the Company's activities, investors and other persons (hereinafter collectively referred to as Information Recipients) of information about the Company and its activities affecting their interests, including to increase the information transparency of the Company and establish a clear information flow between the Company and Recipients information;

3) protection of information constituting commercial and official secrets. In accordance with the legislation of the Republic of Kazakhstan, the Company determines the procedure for classifying information into access categories, conditions for storing and using information, determining the circle of persons entitled to free access to information constituting commercial and official secrets, and takes measures to protect its confidentiality.

5. The policy is based on the following principles:

1) legality;

2) openness and transparency of the Company's activities;

3) reliability and completeness;

4) relevance and timeliness;

5) equal access to information;

6) non-disclosure of state secrets and other legally protected secrets;

7) privacy, personal and family secrets;

8) respect for the rights and legitimate interests of individuals and legal entities.

6. Information on the Company's activities is subject to disclosure and (or) presentation to Information Recipients in accordance with the procedure established by the legislation of the Republic of Kazakhstan, the Policy and internal regulatory documents regulating the Company's activities.

Section 4. Communicative means of information dissemination

7. When distributing information, the Company uses the following communication tools, including, but not limited to:

1) a **written document** prepared for the Recipients of information, including, but not limited to, responses to requests, publications (messages) in the mass media, brochures, reports on the Company's activities, materials for the Company's employees;

2) **oral communication**, including, but not limited to, interviews, press conferences, speeches at meetings and public events inside and outside the Society;

3) **audio-visual recording**, including, but not limited to, videos, corporate videos, speeches or interviews in radio and television programs, slides and other means of visual presentation used at meetings, public and other events (conferences) inside and outside the Company;

4) **materials sent (transmitted) on electronic media**, including, but not limited to, by e-mail, on disks, devices and other media.

Section 5. Ways of information dissemination

8. Access to information in the Company is ensured by distributing information in the following ways:

1) providing information at the request of individuals and legal entities;

2) providing (distributing) information to the media, holding press conferences and briefings with the media;

3) by posting information on the Company's Internet resource at: www.qic.kz;

4) by posting information on the official pages of the Company on social networks and (or) other internal Internet resources of the Company;

5) by placing information in the premises occupied by the Company and in other places designated for these purposes;

6) by posting information on the relevant components of the e-government web portal;

7) by posting information on the Internet resource of the financial reporting depository;

8) by posting information on the Internet resource of the stock exchange;

9) in other ways provided for by the legislation of the Republic of Kazakhstan and other internal documents regulating the Company's activities.

Chapter 5.1. Providing information at the request of individuals and legal entities

9. Information on request is provided free of charge.

10. Any information is provided upon request, except for information with limited access.

11. The request may be submitted orally or in writing, including in the form of an electronic document.

12. The recipient of the information may make an oral request in person or by phone.

13. An answer to an oral request is provided according to the following information:

1) The Company's work schedule;

2) postal addresses, e-mail addresses and (or) Internet resources, telephone numbers of information services of the Company, structural divisions, subsidiaries, as well as information about their managers;

3) the procedure for admission of individuals and representatives of legal entities;

4) the procedure for consideration of appeals, requests, applications and complaints of individuals and legal entities;

5) information on conducting open competitive bidding (auctions, tenders);

6) phone numbers for information about available vacancies.

14. In case of providing an answer to an oral request, the name and position of the person who provided the answer shall be indicated.

15. Written requests submitted in accordance with the procedure established by the Law of the Republic of Kazakhstan "On Access to Information", with the exception of anonymous requests, are subject to mandatory acceptance, registration, accounting and consideration.

16. Requests received through publicly available information systems and meeting the requirements of the legislation of the Republic of Kazakhstan on an electronic document and an electronic digital signature are subject to consideration in accordance with the procedure established by the Law of the Republic of Kazakhstan "On Access to Information".

17. A response to a written request is provided within 15 (fifteen) calendar days from the date of receipt by the owner of the information.

In cases where the requested information falls within the competence of several information holders and, when responding to a written request, information is required from other information holders, the review period may be extended once for no more than 15 (fifteen) calendar days, as the Recipient of the information is informed within 3 (three) working days from the date of extension consideration.

18. A written request, the provision of an answer to which is not within the competence of the Company, shall be sent to the relevant information holder no later than 3 (three) business days from the date of receipt of the request, with simultaneous notification of the Recipient of the information who sent the request.

19. The response to a written request is provided at the choice of the Recipient of the information in paper and (or) electronic forms in the language of the request.

20. An answer to an oral request is provided orally in the language of the request.

21. If the requested information is posted in accordance with the procedure established by the Law of the Republic of Kazakhstan "On Access to Information", the Company may notify the user of the information about it, but no later than 3 (three) business days, while simultaneously sending him information about the methods and place of access to the requested information.

22. Upon repeated request, the Company provides the requested information in accordance with the procedure provided for in Chapter 5.1 of the Policy.

23. The provision of access to information is refused:

1) if the content of the request does not allow you to establish the requested information;

2) if the request does not comply with the requirements of the Law of the Republic of Kazakhstan "On Access to Information";

- 3) if the requested information relates to information with limited access;
 - 4) if the request raises the question of conducting an analysis of the activities of the owner of the information or conducting other analytical work before its completion;
 - 5) before making a decision on the results of inspections conducted within the framework of state control and supervision;
 - 6) before the final decision is made on the basis of meetings in government agencies;
 - 7) before the adoption of a mutual agreement on the conditions for the disclosure of documents received from foreign states or international organizations.
24. A reasoned response to the refusal to provide information on a written request is brought to the attention of the Recipient of the information within 5 (five) business days from the date of registration of the request.

Chapter 5.2. Provision (dissemination) of information in the media, holding press conferences and briefings with the media

25. The Company's interaction with the media within the framework of information disclosure is carried out through:

- 1) distribution of official messages;
- 2) providing answers to requests that are not included in official communications;
- 3) conducting press conferences, briefings and other events.

§ 5.2.1. Official reports

26. An official communication is information provided and (or) disseminated through the mass media by the Company in accordance with the Law of the Republic of Kazakhstan "On Access to Information".

27. An official communication may be distributed orally or in writing, including in the form of an e-mail or document.

28. The distribution of an official communication in oral form may be carried out through a public speech by the Chairman of the Management Board of the Company or an authorized person.

29. The official message is provided to the media on equal terms, regardless of their form of ownership and affiliation.

30. To a written request from the media to clarify the provided official communications, the Company is obliged to provide a response no later than 2 (two) business days from the date of registration of the request in accordance with the procedure established by the legislation of the Republic of Kazakhstan, or to give an answer indicating the deadline for its submission or a reasoned refusal.

In response to a written request for clarification of the provided official communications, which requires additional study and verification, the review period may be extended once for no more than 15 (fifteen) calendar days, as reported to the media within 2 (two) working days from the date of extension of the review period.

31. In case of receipt of a written request from the media to clarify the provided official communications, issues on which are not within the competence of the Company, this request must be sent to the relevant authorities within 2 (two) business days with a notification to the media.

32. Responses to requests for clarification of the provided official communications, submitted in writing or in the form of an electronic document, are submitted in the language of the request.

Responses to requests for clarification of the provided official communications are submitted in the form of an incoming request, unless otherwise specified in the request itself.

§ 5.2.2. Providing answers to media inquiries that are not included in official communications

33. The media has the right to make requests for information that is not included in the official message.

The response to the request is submitted within 5 (five) business days from the date of its receipt in the form and in the language of the received request, unless otherwise specified in the request itself.

In cases where the requested information falls within the competence of several information holders and, when responding to a written request, it is required to receive information from other information holders, the review period may be extended once for no more than 15 (fifteen) calendar days, as reported to the mass media within 2 (two) working days from the date of extension the period of consideration.

34. The provision of information upon request is refused:

- 1) if the content of the request is not within the competence of the Company;
- 2) if the request does not comply with the requirements of the Law of the Republic of Kazakhstan "On Mass Media";
- 3) if the requested information relates to information with limited access;
- 4) before making a decision on the results of state control;
- 5) before the final decision is made on the basis of meetings in government agencies;
- 6) before the adoption of a mutual agreement on the conditions for the disclosure of documents received from foreign States or international organizations.

35. The Company's officials are responsible for failure to provide or late submission of a response to a media request, as established by the laws of the Republic of Kazakhstan.

§ 5.2.3. Holding press conferences and briefings with the media

36. If necessary, by the decision of the Chairman of the Management Board of the Company, press conferences and briefings for the media can be organized.

By holding press conferences and briefings for the media, the Company informs about significant events, decisions, positions of the Society, as well as regulates crisis situations.

Holding press conferences and briefings provides direct access to information for the media.

Chapter 5.3. Posting information on the Company's Internet resource

37. The Company ensures the smooth functioning of the Internet resource.

38. The Internet resource should be adapted for use by persons with disabilities with visual and/or hearing impairments.

39. Updating of information posted on the Company's Internet resource is carried out as necessary, but at least 1 (one) time a week. Updating of sections of the Internet resource is carried out no later than 3 (three) working days from the date of receipt or creation of information.

40. The information is posted on the Company's Internet resource in the state, Russian and English languages at the same time.

41. The Company regularly monitors the completeness and relevance of information posted on the Company's Internet resource, and determines the compliance of this information posted on the Kazakh, Russian, and English versions of the Company's Internet resource.

42. The Management Board of the Company approves the internal regulatory document of the Company, in accordance with which information is posted on the Company's Internet resource, and which defines sections/subsections of the Company's Internet resource, information posted on the Company's Internet resource, structural units responsible for preparing information, as well as deadlines for providing information.

43. The Company provides disclosure of information on the Internet resource in accordance with the Law of the Republic of Kazakhstan "On Access to Information", the Corporate Governance Code of the Company.

44. Information should be posted on the Internet resource:

1) general information about the Company, including information about the Company's mission, main objectives, goals and activities, amount of equity, amount of assets, net income and number of employees of the Company;

2) about the Company's development strategy (at least strategic goals);

3) priority areas of activity;

4) the Charter and internal documents regulating the activities of bodies, committees, and the corporate Secretary, regulations on the Internal Audit Service, Anti-corruption compliance service, Ombudsman of the Company;

5) The Corporate Governance Code;

6) The Code of Corporate Ethics;

7) risk management policy;

8) the organizational structure of the Company;

9) about the members of the Board of Directors of the Company, including the following information: photo, surname, first name, patronymic, date of birth, citizenship, status of a member of the Board of Directors of the Company (independent director, shareholder representative), indication of the functions of a member of the Board of Directors of the Company, including membership in committees of the Board of Directors of the Company or acting as Chairman of the Board of Directors of the Company, education, including basic and additional education (name of educational institution, year of graduation, qualification, degree), work experience over the past five years, main place of work and other positions currently held, professional qualifications, date of first election to the Board of Directors of the Company and date of election to the current Board of Directors of the Company, the number and share of shares owned by affiliated companies, criteria of independent directors;

10) about the members of the Management Board of the Company, including the following information: photo, surname, first name, patronymic, date of birth, citizenship, position and functions performed, education, including basic and additional education (name of educational institution, year of graduation, qualification, degree), work experience over the past five years, professional qualifications, positions held concurrently, the number and share of shares owned by affiliated companies;

11) remuneration policy for members of the Board of Directors of the Company;

12) remuneration policy for members of the Management Board of the Company;

13) financial statements prepared by the Company;

14) management's analysis and assessment of the Company's financial and economic activities;

15) annual reports of the Company;

16) about the external auditor of the Company, including the following information: the name of the external auditor, the amount of remuneration of the external auditor for the year (separately for audit services and separately for non-audit services), the external audit policy, the list of services provided by the external auditor, in addition to audit services, a description of the process of appointing an external auditor and interaction with him of the Company's bodies, the duration of the relationship with an external auditor;

17) about the Company's procurement activities;

18) on the structure of the Company's authorized capital, including the following information: the number and nominal value of issued shares, a description of the rights granted by shares, the number and nominal value of declared but outstanding shares, the procedure for disposing of ownership rights;

19) on the structure of assets, including information on affiliated organizations at all levels with a brief indication of the scope of their activities;

20) decisions of the Sole Shareholder;

21) decisions of the Board of Directors of the Company;

22) annual calendar of corporate events;

23) monthly corporate event calendars;

24) on the practice of corporate governance of the Company;

25) on interested-party transactions, including information about the parties to the transaction, the essential terms of the transaction (the subject of the transaction, price of the transaction), the Company's body that made the decision to approve the transaction;

26) on major transactions, including information about the parties to the transaction, the essential terms of the transaction (the subject of the transaction), the body of the Company that made the decision to approve the transaction;

27) on the policy and practice of corporate social responsibility of the Company;

28) on the amount of approved dividends;

29) sustainability reports and other non-financial reporting;

30) news and press releases;

31) history of development;

32) by vacant positions: advertised vacant positions; qualification requirements for candidates for vacant positions; phone numbers for information about vacant positions;

33) Q&A service;

34) schedule of personal reception of individuals and representatives of legal entities;

35) contact details (surname, first name, patronymic (if it is indicated in the identity document), phone number and e-mail address) of authorized persons, through which it is possible to obtain information on personal reception of individuals and representatives of legal entities, as well as consideration of appeals and requests, including the procedure for appealing decisions and (or) actions (inaction) based on the results of consideration of appeals and requests;

36) information on the activities of advisory bodies;

37) contact details (postal address, e-mail address, phone numbers) of information services, structural divisions, territorial representations and subsidiaries, affiliates and other legal entities affiliated with them in accordance with the legislative acts of the Republic of Kazakhstan;

38) information in the field of international cooperation;

39) statistical indicators and performance results;

40) information repeatedly requested by information Recipients based on the results of summarizing and analyzing received requests;

41) information on the activities of subsidiaries, affiliates and other legal entities affiliated with them in accordance with the legislative acts of the Republic of Kazakhstan;

42) analytical reports and progress reports;

43) data on the results of sociological, analytical and other studies, as well as population surveys;

44) information repeatedly requested by users of information, based on the results of generalization and analysis of received requests;

45) a list of databases (banks) of data, registries, cadastres under their jurisdiction;

46) samples of applications and requests accepted for consideration in accordance with the laws and other regulatory legal acts of the Republic of Kazakhstan;

47) other information in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

Chapter 5.4. Posting information on the official pages of the Company on social networks and (or) other internal Internet resources of the Company

45. The Company regularly posts information on official pages on social networks and (or) on other internal Internet resources of the Company in order to increase coverage, strengthen its digital presence and increase trust in the Company.

The information posted on the official pages on the social networks of the Company is official and adapts taking into account the characteristics of the target audience.

The information posted on the official pages on the Company's social networks is official, accurate and up-to-date. It is adapted taking into account the characteristics of the target audience and is posted in the Kazakh and Russian languages in accordance with the requirements of the Law "On Languages in the Republic of Kazakhstan".

Key news and news mentioning the Sole Shareholder's top management are posted only after agreement with the Sole Shareholder and are accompanied by a mark on joint placement or a joint post.

The visual design of all materials must comply with the approved PR strategy and brand book, ensuring aligned style and brand recognition of the Company and the Sole Shareholder.

Information is provided in an accessible and understandable form, using an appropriate style and tone of communication, which helps to increase the involvement of the target audience and the formation of a positive image of the Company among recipients of information.

When posting information, the Company complies with the requirements of confidentiality and corporate policy, and also guarantees that the content complies with the legislation of the Republic of Kazakhstan, including the Laws "On the Mass Media" and "On the Protection of Personal Data" of the Republic of Kazakhstan.

To assess the effectiveness of its presence on social networks, the Company uses indicators of involvement, coverage and other relevant metrics, which allows it to constantly improve the quality of information provided and interaction with the target audience.

Chapter 5.5. Placement of information in the premises occupied by the owners of the information

46. The Company places information stands and (or) other technical means of a similar purpose with information about its activities in the premises occupied by it and creates conditions for free access to them by persons with disabilities.

47. Information on information stands and (or) other technical means of a similar purpose must contain:

- 1) the Company's working procedure, including the procedure for admission of individuals and representatives of legal entities;
- 2) conditions and procedure for obtaining information;
- 3) other information.

Chapter 5.6. Posting information on the e-government web portal

48. In accordance with the Law of the Republic of Kazakhstan "On Access to Information", the Company undertakes to post information on the Internet portal of open data and open dialogue.

Chapter 5.7. Posting information on the Internet resource of the financial reporting depository

49. The Company is obliged to disclose information on the Internet resource of the financial reporting depository in accordance with the procedure established by the Law of the Republic of Kazakhstan "On the Securities Market" and the regulatory legal act of the authorized body of the Republic of Kazakhstan.

50. During the period of circulation of equity securities, the Company is obliged to disclose information on the Internet resource of the financial reporting depository in accordance with the legislation of the Republic of Kazakhstan.

Chapter 5.8. Posting information on the Internet resource of the stock exchange

51. The Company is obliged to disclose on the Internet resource of the stock exchange (<https://kase.kz/>) information in accordance with the procedure established by the Law of the Republic of Kazakhstan "On the Securities Market" and the regulatory legal act of the authorized body of the Republic of Kazakhstan.

52. At the same time, the procedure for disclosure of information, requirements for the content of information to be disclosed, as well as the timing of disclosure of information on the stock exchange's Internet resource are established by internal documents of the stock exchange.

Section 6. Interaction with Information Recipients

Chapter 6.1. Disclosure of information to the Sole Shareholder of the Company

53. In order to protect the rights and interests of the Sole Shareholder, the Company provides access to information about the Company, in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan, the Policy and other internal regulatory documents regulating the Company's activities.

54. The Corporate Secretary ensures timely provision to the Sole Shareholder of information affecting his interests in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents regulating the Company's activities.

55. The sole shareholder has the right to receive information about the Company's activities, including to get acquainted with the financial statements of the Company, with the exception of information:

1) financial statements published on the depository's Internet resource as of the date of the claim;

2) requested repeatedly within the last 3 (three) years (provided that the information previously requested by the Sole Shareholder was provided in full);

3) related to the previous periods of the Company's activity (more than 3 (three) years before the date of the Sole Shareholder's appeal), except for information on transactions that are executed on the date of the Sole Shareholder's appeal.

Chapter 6.2. Disclosure of information to the Board of Directors of the Company

56. Disclosure of information to the Board of Directors of the Company is carried out in accordance with the procedure established by the laws of the Republic of Kazakhstan "On Joint Stock Companies", "On the Securities Market" and "On Access to Information", in accordance with the Charter of the Company and the Regulations on the Board of Directors of the Company.

57. The Chairman and members of the Management Board of the Company, heads of structural divisions of the Company are obliged, no later than 10 (ten) calendar days at the written request of a member of the Board of Directors of the Company, to provide him with information (documents, materials) regarding the Company necessary for the performance of his functions by a member of the Board of Directors of the Company, or to provide a written reasoned explanation indicating the reason for the impossibility submission of information within the specified period. The presentation of information (documents, materials) constituting an official or commercial secret is carried out in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company.

58. The limitation period for non-disclosure of internal (official) information of the Company by former members of the Board of Directors of the Company after termination of their activities as members of the Board of Directors of the Company is 5 (five) years.

Chapter 6.3. Disclosure of information to the state bodies of the Republic of Kazakhstan

59. The Company discloses information to the state bodies of the Republic of Kazakhstan in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

60. The Company must disclose information to the following government agencies, but not limited to:

- 1) the authorized body for regulation, control and supervision of the financial market and financial organizations;
- 2) the authorized state body on taxation issues;
- 3) the authorized state body for statistics.

61. In accordance with the requests of state bodies, in cases provided for by the legislation of the Republic of Kazakhstan, the Company provides them with relevant information within its competence.

If the legislation of the Republic of Kazakhstan does not impose on the Company the obligation to provide such information, and if the subject of the request goes beyond the competence of the relevant state bodies, the decision on the expediency of providing the requested information in each specific case is made by the Chairman of the Management Board of the Company.

Confidential information is provided to government agencies in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company. At the same time, the Company has the right to demand that the state bodies to which information is provided comply with their obligations to protect its confidentiality.

62. The list of information disclosed to government agencies may change depending on changes and additions to the legislation of the Republic of Kazakhstan.

Chapter 6.4. Disclosure of information to investors and partners

63. The financial and management statements of the Company are prepared and provided in a timely manner in accordance with the legislation of the Republic of Kazakhstan and IFRS, while the financial statements are reviewed by independent auditors.

64. Information on the influence of the Sole Shareholder and other interested parties (republican, local authorities), as well as on the procedure for monitoring and approving transactions with interested parties is known, transparent and accessible.

65. The Company strives to limit the number of transactions in which there is an interest. In case of such transactions, the Company discloses information provided for by the legislation of the Republic of Kazakhstan, the charter and internal regulatory documents of the Company.

66. The Company has regulated and operates the process of internal control over the disposal and use of insider information. Persons recognized as insiders in

accordance with the Company's internal regulatory documents shall ensure compliance with the relevant requirements for the use and dissemination of insider information.

Chapter 6.5. Disclosure of information to interested and other persons

67. The Company provides interested parties with access to information affecting the rights and interests of interested parties on a timely and regular basis in accordance with the legislation of the Republic of Kazakhstan, the Company's Charter and internal documents of the Company.

68. The Company's employees have the right to receive complete and reliable information about working conditions and labor protection. This information, as well as other information related to the performance of an employee's functional duties, is brought to the attention of the employee after signing an employment contract in accordance with the procedure established by the legislation of the Republic of Kazakhstan and internal documents of the Company.

69. At the request of other organizations that are not government agencies, the Company may provide information only subject to restrictions and in accordance with the procedure established by the legislation of the Republic of Kazakhstan and internal documents of the Company.

The procedure for disclosure of information in the Company's relations with an audit organization, consulting companies (consultants), rating agencies is determined by the legislation of the Republic of Kazakhstan, internal documents of the Company and contracts concluded with these organizations.

Section 7. Disclosure of public information about the Company's activities

70. The Company strives to raise public awareness of its activities both inside and outside Kazakhstan. This can contribute to the formation of a positive public opinion (favorable image) about the Company and strengthen the trust of investors and the public.

71. The Management Board of the Company may approve on an annual basis a plan according to which articles, interviews, press releases, other necessary information, as well as appearances on radio and television programs are published in the mass media.

72. At the same time, the Company has a Marketing and Communication Strategy that defines the principles, internal approaches to managing marketing and communication processes in the Company, as well as the general processes of employee interaction with representatives of the mass media and the public, including measures to counter negativity.

73. The Company publishes press releases. The main task of a press release is to communicate the news in such a way that it:

- 1) It was published in whole or in part in the mass media;
- 2) the public is interested.

74. A press release is transmitted to the mass media and posted on the Company's Internet resource only after its approval by the Chairman of the Management Board of the Company and (or) another authorized person of the Company.

75. The Chairman of the Management Board of the Company is the main speaker representing the Company. The Chairman of the Management Board of the Company may give interviews, comments, write posts for the Company's pages on social networks, as well as inform about the Company's activities in any other way.

Only authorized officials and employees of Company have the right to speak publicly, comment on Company events or make any statements on behalf of Company in the media and social networks, in accordance with their area of competence and authority.

76. The Company has the right to issue brochures and other printed publications about its activities.

Section 8. Disclosure of preliminary information

77. The Company does not provide forecasts regarding the Company's net profit or other indicators before the release of the relevant press release.

78. The Company may provide preliminary information to the investment community with the condition of excluding liability for possible unreliability of statements. Such information is provided in sufficient volume to ensure an objective assessment of the Company and its development prospects by analysts and investors, under the following conditions:

1) The information is not confidential;

2) the information does not contain forecasts about the results of financial and economic activities;

3) The information was prepared by authorized employees of the Company.

79. Such preliminary information may include:

1) assessment of income, expenses and capital expenditures;

2) other commercial and technical information, subject to the conditions set out above.

80. Information about the Company or its activities, which constitutes an official, commercial or other legally protected secret in accordance with the Company's Charter, is determined by the Board of Directors of the Company.

81. If confidential information is subject to mandatory public disclosure in accordance with the requirements of the legislation of the Republic of Kazakhstan, with the exception of the legislation of the Republic of Kazakhstan on access to information, such information is confidential information until proper public disclosure.

82. Preliminary information should not contradict information previously disclosed in any form, including annual, quarterly and other reports, as well as reports on material facts and press releases, unless explanations are provided for deviations of new information from previously disclosed information.

83. In the event that preliminary information is included in a written document, it should also contain an appropriate warning that this information is preliminary and

may change significantly. In the case of oral disclosure of preliminary information, such a warning must be voiced or referred to a press release or report, the text of which contains such a warning.

84. Preliminary information concerning the results of the Company's financial and economic activities may be discussed by members of the Board of Directors and the Management Board of the Company, as well as individual employees of the Company whose work is related to the preparation and disclosure of financial results during the normal course of business. The above-mentioned persons are fully responsible for the non-disclosure of such information.

Section 9. Disclosure of information by authorized bodies, officials and employees of the Company

85. The competence and responsibility of authorized bodies, officials and employees of the Company for disclosure of information is determined in accordance with the legislation of the Republic of Kazakhstan and internal documents regulating the Company's activities.

86. The Chairman of the Board of Directors of the Company has the right to officially comment on decisions taken by the Board of Directors of the Company, as well as to state the point of view of the Board of Directors of the Company on issues considered at meetings of the Board of Directors of the Company, taking into account compliance with the requirements to ensure the safety of official, commercial or other secrets protected by the legislation of the Republic of Kazakhstan.

87. Members of the Board of Directors of the Company have the right to publicly express their views on issues considered at meetings of the Board of Directors of the Company, as well as on decisions taken at a meeting of the Board of Directors of the Company, taking into account compliance with the requirements for ensuring the safety of official, commercial or other secrets protected by the legislation of the Republic of Kazakhstan.

88. The Chairman of the Management Board and members of the Management Board of the Company control the disclosure and provision of information about the Company's activities in accordance with the requirements of the legislation of the Republic of Kazakhstan and are responsible for the organization and timeliness of the submission of information and reporting to Recipients of information, the status and reliability of such information and reporting.

89. The Chairman and members of the Management Board of the Company are obliged not to disclose confidential information during their employment, except in cases provided for by the legislation of the Republic of Kazakhstan, as well as within 3 (three) years from the date of termination of employment in the Company, unless otherwise established by internal documents of the Company.

90. The Chairman and members of the Management Board of the Company are liable to the Company and the Sole Shareholder for damage caused by their actions (inaction), in accordance with the laws of the Republic of Kazakhstan, and for losses incurred by the Company, including, but not limited to losses incurred as a result:

- 1) providing misleading or knowingly false information;
- 2) violations of the procedure for providing information established by the legislation of the Republic of Kazakhstan.

91. The authorized person of the Sole Shareholder, the Chairman and members of the Board of Directors, members of the Management Board of the Company (within their competence) have the exclusive right to make public statements on issues related to the Company's activities.

Authorized employees of the Company have the right to publicly speak (provide information) on behalf of the Company at conferences, meetings, seminars held in the country and abroad, at meetings of working bodies of state bodies of the Republic of Kazakhstan, other public events, participate in press conferences, telephone videoconferences, give interviews, make comments for Kazakhstani and foreign media, financial and investment companies, taking into account compliance with the requirements for ensuring the safety of official, commercial or other secrets protected by the legislation of the Republic of Kazakhstan.

Persons who are not authorized to speak publicly on behalf of the Company in accordance with the established procedure do not have the right to give comments and answers, questions and requests concerning the Company's activities.

92. The prepared publications/texts of speeches by the Company's employees are necessarily coordinated with the Chairman of the Management Board of the Company or an authorized structural unit.

93. Officials and employees of the Company must disclose information about the Company's activities in full accordance with the Policy.

Section 10. Responsibility

94. Officials and employees of the Company are obliged to strictly follow the requirements of the Policy. Officials and employees of the Company whose actions resulted in violations of the Policy requirements are responsible in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

95. In case of violation of the legislation of the Republic of Kazakhstan, the Company's Charter, Policies and internal documents of the Company regarding disclosure of information that led to damage to the Company and/or the Sole Shareholder, the perpetrators may be held accountable in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

Section 11. Final provisions

96. If it is necessary for the Company to disclose information that must first be received by the Company from other persons, the Company takes all measures to receive and constantly update such information in a timely manner.

97. The Company protects information of a secret and (or) confidential nature in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan and internal documents of the Company.

98. The Policy is subject to periodic assessment, revision and updating as necessary, taking into account changes in the legislation of the Republic of Kazakhstan affecting the provisions of the Policy.

99. The relations not regulated by the Policy are regulated by the legislation of the Republic of Kazakhstan.

If there are contradictions between the Policy and the norms of the legislation of the Republic of Kazakhstan, the norms of the legislation of the Republic of Kazakhstan are subject to application.

In case of changes in the legislation of the Republic of Kazakhstan, the Company's Charter, the Policy rules apply in a part that does not contradict the legislation of the Republic of Kazakhstan and the Company's Charter.

100. The Policy is put into effect from the moment of its approval by the Board of Directors of the Company, unless otherwise reflected in the decision of the Board of Directors of the Company.