

**Rules for Internal Control over the Disposition and Use of Insider Information in
«Altyn Bank» (Subsidiary Bank China Citic Bank Corporation Limited)**

Chapter 1. General Provisions

1. Rules for Internal Control over the Disposition and Use of Insider Information in «Altyn Bank» (Subsidiary Bank China Citic Bank Corporation Limited) (hereinafter - the Rules) are developed in accordance with the Law of the Republic of Kazakhstan "On the Securities Market", the Law of the Republic of Kazakhstan "On Joint Stock Companies", the Law of the Republic of Kazakhstan "On Banks and Banking Activities in the Republic of Kazakhstan", the Resolution of the Board of the National Bank of the Republic of Kazakhstan "On approval of the Rules and Conditions for Disclosing Information Concerning the Issuer's Activities and Not Being Publicly Available", other regulatory legal acts of the Republic of Kazakhstan, internal regulatory documents of Altyn Bank Joint Stock Company (Subsidiary Bank of China Citic Bank Corporation Limited) (hereinafter referred to as the Bank) and establish the procedure and conditions for disclosing information relating to the activities of the Bank and not being publicly available, if this information, due to the consequences for the property and financial position of the Bank, is capable of affecting the value of securities issued (provided) by the Bank (derivative financial instruments).

2. Issues not regulated by these Rules are regulated in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the Bank.

3. In order to ensure that the Bank's insiders comply with the requirements of the legislation of the Republic of Kazakhstan in relation to the insider information of the Bank and these Rules, these Rules are posted in the state and Russian languages on the Internet resource of the Depository of Financial Statements, and on the Internet resource of the stock exchange operating in the territory of the Republic of Kazakhstan (in case of inclusion and finding of securities (derivative financial instruments) of the Bank in the list of this stock exchange), and are also provided by the Bank at the request of interested parties without charging a fee, except for the fee for providing copies of the Rules in an amount not exceeding the cost of their production .

4. These Rules are subject to execution by all employees of the Bank.

Chapter 2. Basic concepts and terms

5. Basic concepts and terms used in these Rules:

1) *Bank* - Altyn Bank Joint Stock Company (Subsidiary Bank of China Citic Bank Corporation Ltd.);

2) *FRD* - financial reporting depository, determined in accordance with the legislation of the Republic of Kazakhstan on accounting and financial reporting;

3) *insider information of the Bank* - reliable information about securities or derivative financial instruments of the Bank, transactions with them, as well as about the Bank as their issuer, information about its activities, which is a commercial secret, as well as other information not known to third parties, disclosure of which may affect the change in the value of the Bank's securities and/or derivative financial instruments, as well as the Bank's activities;

4) *insider information of a person in relation to whom the Bank is recognized as an insider* - reliable information about securities or derivative financial instruments of another person in respect of which the Bank is recognized as an insider, transactions with them, as well as other information not known to third parties, the disclosure of which may affect to changes in the value of securities (derivative financial instruments) and to the activities of persons in respect of which the Bank is recognized as an insider;

5) *insider* – a person having access to insider information;

The Bank's insider is a person who has access to the Bank's insider information, which is determined in accordance with these Rules.

If the Bank is recognized as an insider in relation to another person, in accordance with the legislation of the Republic of Kazakhstan, employees of the Bank who, by virtue of their official

position and labor duties, have access to insider information of a person in relation to which the Bank is recognized as an insider, are also recognized as insiders of such a person;

6) *responsible divisions* - Credit Analysis Department, Financial Institutions Department, Department for Work with Corporate Clients, Directors of the Bank's Branches, Business Risk Department of the Retail Business Unit, Operations Department, Business Risk Department of the Operational and Financial Block, Controlling and Budgeting Department, Accounting Department, Compliance Department, Corporate Credit Risk Department, Retail Credit Risk Department, Financial and Operational Risk Department, Collateral Management Department, Work Department with problem loans, the Internal Audit Department, the Corporate Secretary, the Legal Department, the Treasury Department, the Information Technology Department, the Information Security Department, the Private Banking Department, as well as other divisions of the Bank as agreed with the Chief Compliance Controller;

7) *list of insiders* - a list of persons having access to the insider information of the Bank, as well as a list of persons (employees of the Bank) having access to insider information of a person in respect of which the Bank is recognized as an insider in accordance with Chapter 5 of these Rules. The procedure for maintaining and updating the list of insiders is determined by these Rules;

8) *employees* - employees of the Bank, including executive employees of the Bank;

9) *Executive employees of the Bank* - the first head and members of the Board of Directors, the first head and members of the Management Board, other heads of the Bank, who coordinate and (or) control the activities of the structural divisions of the Bank and have the right to sign documents on the basis of which banking operations are carried out, with the exception of the first heads of separate divisions of the Bank and their chief accountants, the Chief Accountant of the Bank. At the same time, persons who have the right to sign documents on the basis of which banking operations are carried out and exercise control over the activities of only one structural unit are not the Bank's executives.

Chapter 3. Targets and goals

6. The purpose of these Rules is to ensure that the Bank complies with the laws of the Republic of Kazakhstan governing the use of insider information, as well as increasing the level of business reputation, maintaining a high degree of corporate governance, and ensuring the stability of the Bank.

7. These Rules determine the list of the Bank's insider information, establish the procedure for controlling the disposal and use of insider information of the Bank and other persons in respect of which the Bank is recognized as an insider, the procedure and conditions for its disclosure, maintaining the list of insiders, determine the restrictions established for insiders, as well as liability for disclosure of insider information.

Chapter 4. List of information related to insider trading

8. The Bank's insider information includes the following information:

1) financial statements of the Bank;

2) other than financial statements, information regarding the financial position of the Bank, including, but not limited to, information on the calculation of the equity capital adequacy ratio, information on compliance with prudential standards;

3) information on changes in the activities of the Bank affecting the interests of securities holders:

a) changes in the composition of the Bank's bodies;

b) changes in the composition of shareholders owning ten or more percent of the voting shares of the Bank;

- c) reorganization or liquidation of the Bank;
 - d) attachment of the property of the Bank;
 - e) pledge (re-pledge) of the Bank's property in the amount of ten or more percent of the Bank's assets;
 - f) obtaining, suspending or revoking the license of the Bank;
 - g) decisions of the general meeting of shareholders of the Bank;
 - h) decisions taken by the Board of Directors on the list of issues, information on which, in accordance with the Bank's internal documents, must be brought to the attention of shareholders and investors;
 - i) changes in the list of organizations in which the Bank owns ten or more percent of the shares (interests, shares) of each such organization;
 - j) changes to the prospectus for issuance of emissive securities;
 - k) information on non-compliance by the Bank with the conditions stipulated by the prospectus for the issue of non-government bonds, facts of default committed by the Bank (when the Bank issues bonds);
- 4) insider information about corporate events of the Bank:
- a) decisions taken by the General Meeting of Shareholders;
 - b) decisions taken by the Board of Directors on the list of issues, information on which, in accordance with the Bank's internal documents, must be brought to the attention of shareholders and investors;
 - c) issuance by the Bank of shares and other securities and approval by the authorized body of reports on the results of placement of the Bank's securities, reports on the results of redemption of the Bank's securities, cancellation of the Bank's securities by the authorized body;
 - d) major transactions by the Bank and transactions that simultaneously meet the following conditions: are transactions in which the Bank has an interest, and are related to the acquisition or disposal of property, the value of which is ten or more percent of the total balance sheet value of the Bank's assets as of the date of acceptance by the authorized body of the Bank decisions on the conclusion of such transactions;
 - e) information on the transaction, as a result of which property is acquired or alienated in the amount of ten or more percent of the Bank's assets, must include information about the parties to the transaction, the assets acquired or disposed of, the terms and conditions of the transaction, the nature and extent of the participation interests of the parties involved, and also in the presence of other information about the transaction;
 - f) pledge (re-pledge) of the Bank's property in the amount of five or more percent of the Bank's assets;
 - g) receipt by the Bank of a loan in the amount of twenty-five percent or more of the Bank's equity capital;
 - h) receipt by the Bank of permits to carry out any types of activities, suspension or termination of the permits previously obtained by the Bank to carry out any types of activities;
 - i) participation of the bank in the establishment of a legal entity;
 - j) seizure of the Bank's property;
 - k) the occurrence of circumstances of an extraordinary nature, as a result of which the Bank's property was destroyed, the book value of which amounted to ten or more percent of the total assets of the Bank;
 - l) bringing the Bank and its officials to administrative responsibility;
 - m) initiation of a corporate dispute in court;
 - n) decisions on compulsory reorganization of the Bank;
 - o) other events affecting the interests of the Bank's shareholders and investors in accordance with the Bank's charter, as well as the Bank's securities issue prospectus.

9. Other information classified as insider information by the Bank, as well as defined as insider information in accordance with the legislation of the Republic of Kazakhstan.

10. Insider information is insider information from the moment it occurs and until the moment of its disclosure to an unlimited circle of persons in accordance with the legislation of the Republic of Kazakhstan and/or these Rules.

11. The insider information of the Bank does not include:

1) information prepared on the basis of publicly available information, including studies, forecasts and assessment of the value of a security (derivative financial instrument), property status of the Bank, made in order to make investment decisions and (or) prepare recommendations or proposals for transactions with securities securities (derivative financial instruments);

2) information received from the mass media;

3) unconfirmed information, the source of which is unknown, distributed among a wide range of people, as well as assumptions regarding the current or planned activities of the Bank as an issuer.

Chapter 5. Bank insiders

12. The following persons are recognized as insiders:

1) officials and employees of the Bank who have access to insider information due to their official position and the exercise of their functional duties and powers, they include:

a) members of the Board of Directors, members of the Management Board, Chief Accountant of the Bank, Chief Risk Manager, Chief Compliance Controller, Corporate Secretary, managers who coordinate and (or) control the activities of responsible units, assistants (secretaries) to members of the Management Board and the Board of Directors, members Committees of the Bank, except for members of the Human Resources and Remuneration Committee;

b) employees of responsible departments;

Persons referred to this category of the Bank's insiders are such during the term of the employment contract concluded by them with the Bank.

2) employees of the Bank, not specified in subparagraph 1) of this paragraph, who have access to insider information temporarily due to their participation in the relevant project. Persons referred to this category of the Bank's insiders are such until the disclosure of insider information to which they have received access;

3) persons who have access to insider information by virtue of owning, using and (or) disposing directly or indirectly ten or more percent of voting shares (stakes in the authorized capital) of the Bank;

4) an audit organization, an appraiser, professional participants in the securities market and other persons providing services to the Bank in accordance with the concluded agreement (including oral), the terms of which provide for the disclosure of insider information;

5) an organizer of trading, the list of which includes securities (derivative financial instruments) issued (provided) by the Bank;

6) members of the Board of Directors of the stock exchange, the listing commission of the stock exchange and the expert committee of the stock exchange, in the trading system of which transactions with securities of the Bank, established to consider the issues of recognition of transactions with securities made for the purpose of manipulation, are concluded;

7) employees of the National Bank of the Republic of Kazakhstan and its departments, civil servants with access to insider information

by virtue of the functions and powers granted to them;

8) public associations and self-regulatory organizations whose members are the Bank and the organizations specified in subparagraphs 3), 4) and 5) of this paragraph, which, by virtue of the powers granted to them, have access to insider information;

- 9) employees of the organizations specified in subparagraphs 3), 4), 5) and 8) of this paragraph, who have access to insider information due to their official position and labor duties;
- 10) persons who received insider information from persons specified in subparagraphs 1) - 9) of this paragraph.

Chapter 6. The procedure for maintaining and maintaining up to date the list of persons with access to the Bank's insider information

13. In order to ensure control over the disposal and use of the Bank's insider information and securities issued (represented) by it (derivative financial instruments), the Bank maintains a list of insiders, which must be kept up to date, in accordance with Appendix 1 to these Rules.

14. The Compliance Department notifies the Bank's insiders about their inclusion in the list of insiders (exclusion from the list of insiders), about the requirements of the Law of the Republic of Kazakhstan "On the Securities Market" and these Rules regarding the disposal and use of insider information, by sending a notification to insiders by e-mail directly to the insider in the form in accordance with Appendices 2, 3 to these Rules (hereinafter referred to as the notification) no later than 5 (five) business days from the date of occurrence of the grounds for including a person in the list (exclusion from the list).

15. The Bank's insiders specified in subparagraphs 3) - 5), 8), 9) of paragraph 12 of these Rules are obliged to provide the Bank with a list of their employees who, due to their official position and labor duties, have access to the Bank's insider information, within 5 (five) business days from the date of receipt of the request from the Bank or no later than 5 (five) business days from the date of making changes to it in case of updating.

16. The Insider must provide the signed form within 5 (five) business days to the Compliance Department.

17. The unit responsible for maintaining the list of insiders, keeping it up to date, notifying persons who have gained access to the Bank's insider information about their inclusion in the list of insiders (exclusion from the list), informing insiders about the requirements of the legislation of the Republic of Kazakhstan in terms of disposal and use insider information and these Rules is the Compliance Department.

18. If the Bank's employees included in the list of the Bank's insiders on a permanent basis get access to another category of insider information on a temporary basis (for example, due to their participation in any project), re-sending a notice of inclusion/exclusion of such employees it is not required to be included in the list of insiders.

19. Responsible employees of the Compliance Department have access to the list of insiders.

20. In pursuance of paragraphs 12 and 40 of these Rules, when establishing civil law relations (concluding transactions, contracts) with persons who, within the framework of established legal relations, disclose the Bank's insider information, the contract concluded with these persons may provide for the obligations of these persons on maintaining their own list of insiders (employees who have access to the Bank's insider information due to their official position and labor duties), notifying the employees included by them in their list of insiders about inclusion/exclusion from the list, on liability for disclosure and/or misuse of insider information information, as well as the obligation to provide a copy of its list of insiders to the Bank in the manner and within the time limits established by these Rules.

21. In order to include in the list of the Bank's insiders (exclude from the list) the persons specified in subparagraphs 2) and 4) of paragraph 12 of these Rules, and to comply with the procedures established in relation to the Bank's insiders, the head of the relevant division, whose employees receive temporary access to the insider information, as well as the head of the unit responsible for establishing civil law relations with the persons specified in subparagraph 4) of paragraph 12 of these Rules, are obliged, within 5 (five) business days before providing these persons with access to insider information / termination of the right to access to insider information information, send a memo with

appropriate justification to the Compliance Department on the need to include them in the list of insiders / exclusion from the list of insiders of the Bank.

22. The final decision on the need to include/exclude such employees in the list of insiders is made by the Chief Compliance Controller.

23. In order to update the list of insiders in a timely manner, the HR Department informs the Compliance Department about the admission and transfer of the Bank's employees. Upon dismissal of an employee, upon signing a bypass sheet, the resigning employee is required to undergo an audit by the Compliance Department. If the resigning employee is an insider, the employee signs the Notice of exclusion from the list of insiders in the form of Appendix No. 3 to these Rules.

Chapter 7. The procedure for the interaction of the Bank with persons in respect of which the Bank is recognized as an insider

24. The Bank is recognized as an insider in relation to a person whose insider information the Bank has access to within the framework of civil law relations established with him, a contract concluded, the terms of which provide for the disclosure of this person's insider information to the Bank.

25. Employees of the Bank, who, due to their official position and labor duties, have access to insider information of persons in respect of whom the Bank is recognized as an insider, are also insiders of these persons.

26. Persons in respect of which the Bank is recognized as an insider are obliged in accordance with the legislation of the Republic of Kazakhstan independently ensure control over the disposal and use of insider information to which the Bank and its employees have access.

27. If the Bank is recognized as an insider on the grounds provided for in paragraph 24 of these Rules, the persons specified in paragraph 24 of these Rules shall be responsible for sending the Bank a notification of its recognition as an insider and inclusion in the list of insiders. The Bank shall not be liable for disclosure of information that may be recognized as insider information, if the Bank has not received a notice of its inclusion in the list of insiders of a person in respect of which the Bank is recognized as an insider.

28. The Bank and its employees who are insiders on the grounds provided for in paragraphs 24-25 of these Rules are subject to the requirements of the legislation of the Republic of Kazakhstan and these Rules on the procedure for disposing and using insider information of persons in respect of which the Bank is recognized as an insider.

29. The Compliance Department upon receipt of a notice of recognition of the Bank as an insider and its inclusion in the list of insiders of persons whose insider information the Bank has access to:

1) maintains a list of the Bank's employees who, due to their official position and job duties, have access to the insider information of these persons;

2) inform the Bank's employees about the requirements of the legislation of the Republic of Kazakhstan and these Rules regarding the prohibition on the use of insider information of persons in respect of which the Bank is recognized as an insider;

3) informs the persons in respect of whom the Bank is recognized as an insider about the employees of the Bank who, by virtue of their official position and labor duties, have access to insider information of these persons, in the manner and within the time limits established by the legislation of the Republic of Kazakhstan.

30. For the purposes of subparagraphs 2)-3) of paragraph 29 of these Rules, the Bank has the right to request from persons in respect of which the Bank is recognized as an insider, the rules of internal control over the disposal and use of insider information.

31. The list of the Bank's employees who have access to insider information of the persons specified in clause 24 of these Rules is maintained by the Compliance Department.

32. Notification of the Bank's employees who have access to insider information of the persons specified in clause 24 of these Rules is carried out by sending an appropriate memo.

33. When concluding agreements providing for the disclosure of insider information to the Bank, the Bank's divisions are obliged to notify the Compliance Department of the conclusion of the relevant agreements and send a list of their employees who have access to insider information of a person in relation to whom the Bank is recognized as an insider no later than 5 (five) business days from the date of conclusion of the contract.

34. Subdivisions are obliged to keep the list of employees up to date and provide up-to-date information to the Compliance Department no later than 5 (five) business days from the date of receipt of the request or conclusion of the contract.

35. The Compliance Department has the right to request relevant contracts, lists of employees who are insiders under the contracts, as well as other information from the responsible divisions for the purposes of paragraph 29 of these Rules. The requested information is submitted by the responsible divisions of the Compliance Department no later than 5 (five) days from the date of receipt of the request.

36. The exclusion of the Bank's employees from the list of insiders of persons in respect of which the Bank is recognized as an insider is carried out in the event that the Bank receives a notification about the exclusion of the Bank from the list of insiders, or in the event of termination of contractual relations with the person in relation to whom the Bank is recognized as an insider, for which the responsible units are required to notify the Compliance Department.

Chapter 8. Control over disposal and use insider information

37. In the course of carrying out their activities and providing services to the Bank's clients, the Bank's employees must ensure control and compliance with the conditions to prevent the use and / or disclosure of information constituting the Bank's insider information and / or insider information of persons in respect of which the Bank is recognized as an insider.

38. Insiders may not:

1) use insider information when making transactions with securities (derivative financial instruments);

2) transfer to third parties or make insider information available to third parties, except for the cases provided for by the laws of the Republic of Kazakhstan;

3) provide third parties with recommendations on transactions with securities based on insider information.

39. Control over compliance with these Rules is carried out by:

1) Familiarize employees with these Rules by posting them on the Bank's internal website, posting them on a network resource accessible to all employees, as well as informing employees by sending notifications via electronic document management;

2) Keeping the list of insiders up to date by the Compliance Department.

3) Taking measures against insiders in case they commit actions prohibited by these Rules and legislation, including, but not limited to: the requirement to comply with these Rules, taking measures to strengthen control over compliance with the requirements of these Rules, disciplinary measures, other measures.

4) Control over the prevention of the possibility of illegal access and use of the Bank's insider information specified in Chapter 4 of these Rules.

40. Insiders specified in subparagraphs 3) - 5), 8) of paragraph 12 of these Rules are obliged to:

1) maintain a list of its employees who, due to their official position and job duties, have access to the Bank's insider information;

2) inform their employees about the requirements of the legislation of the Republic of Kazakhstan and these Rules regarding the prohibition on the use of insider information;

3) inform the Bank about its employees who, due to their official position and job duties, have access to the Bank's insider information, in the manner and within the time limits established by these Rules.

41. Insiders are obliged to take the necessary measures to restrict access to insider information by third parties and their employees who do not need this information to perform their official duties.

42. The list of the Bank's insiders is submitted to the state body exercising state regulation, control and supervision of the financial market and financial organizations, upon its written request within the time limits specified in the request, with disclosure of information about persons having access to insider information.

43. The list of the Bank's insiders provided to the state body exercising state regulation, control and supervision of the financial market and financial organizations must contain the following information about persons having access to the Bank's insider information:

1) last name, first name, if available - middle name of an individual, date of his birth;

2) the name of the legal entity, its location, details of the document confirming the state registration (re-registration) of the legal entity;

3) the grounds for including the person in the list of insiders, according to which the person is defined as an insider;

4) date of occurrence of the grounds for inclusion in the list of insiders;

5) date of exclusion from the list of insiders.

Chapter 9. Features of control over the disposal and use of insider information by employees of the Bank

44. Heads of responsible departments of the Bank, employees of the Bank having access to insider information are obliged to ensure that the necessary measures are taken to restrict access to such information by other employees of the Bank who do not need this information to perform their official duties, as well as by third parties.

45. The heads of the responsible divisions of the Bank determine the list of employees of their division who have access to insider information and are subject to inclusion in the list of insiders, with the nature of access permanent or temporary.

The criterion for including an employee in the list specified in this paragraph is the need for access to insider information, due to the official position and labor duties of the employee.

46. Heads and employees of responsible divisions who are insiders of the Bank are personally responsible for the completeness and accuracy of information provided to the Compliance Department, as well as for meeting the deadlines for its submission and keeping it up to date (including with regard to the relevance of details of insiders).

47. In order to ensure the confidentiality of insider information, by decision of the authorized body or an executive officer of the Bank, a project, the content of which is related to insider information, may be assigned a certain code name, which is subsequently used by project participants.

48. When establishing a threat or fact of unauthorized disclosure of insider information or loss of documents (information carriers) containing insider information, an insider - an employee of the Bank is obliged to immediately notify his immediate supervisor, who, in turn, immediately informs the Compliance Department and the Chief compliance controller of the Bank.

49. Employees of the Bank who have access to insider information should not conduct discussions regarding insider information in the presence of persons without access to insider information.

50. Only the Chairman of the Management Board of the Bank and/or members of the Management Board of the Bank or persons specially authorized for such actions by the relevant order of the Chairman of the Management Board can participate in meetings with analysts, investors, where insider information can be used, as well as provide official interviews to the media.

Chapter 10. Procedure and terms for disclosure of insider information

51. Information relating to the activities of the Bank, which is not publicly available, if this information, due to the consequences for the property and financial position of the Bank, is capable of influencing the value of securities issued (provided) by the Bank (derivative financial instruments), refers to insider information until the moment of its official disclosure (publication).

Publicly available information about the Bank's activities means information that does not require and does not have restrictions on access to it or is subject to disclosure in accordance with the legislative acts of the Republic of Kazakhstan.

52. Insider information that is not included in the list of information and documents subject to disclosure by the Bank in accordance with paragraph 2 of Article 102 of the Law of the Republic of Kazakhstan "On the Securities Market" on the Internet resource of the Far Eastern Federal District, or is not related to information in respect of which the legislative acts of the Republic Kazakhstan has not established the procedure and terms for its disclosure, it is disclosed in the manner and terms determined by these Rules.

53. Disclosure of information related to the Bank's insider information is carried out by posting it on the Bank's Internet resource - www.altyni.kz, the Far Eastern Federal District Internet resource in cases and in the manner prescribed by the legislation of the Republic of Kazakhstan and (or) these Rules, other internal regulatory documents of the Bank, in the state and Russian languages in the public domain for all interested persons.

54. When securities (derivative financial instruments) of the Bank are included in the list of the stock exchange operating in the territory of the Republic of Kazakhstan, the Bank and persons recognized as insiders of the Bank shall ensure the disclosure of insider information about the Bank and issued (provided) by it securities (derivative financial instruments), the disclosure of which will affect the change in their value and the activity of the Bank, before the start of trading in these securities (derivative financial instruments) in the manner and on the terms established by the rules of the stock exchange.

55. Insider information about changes in the activities of the Bank affecting the interests of holders of its securities, specified in subparagraph 3) of paragraph 8 of these Rules, is posted on the Internet resource of the Far Eastern Federal District, determined in accordance with the legislation of the Republic of Kazakhstan on accounting and financial reporting, and published on the Bank's Internet resource www.altyni.kz, within 15 (fifteen) calendar days from the date of occurrence of such changes.

56. Insider information about corporate events of the Bank, indicated in subparagraph 4) of paragraph 8 of these Rules, is posted on the Internet resource of the Far Eastern Federal District within the time limits established by the legislation of the Republic of Kazakhstan.

57. Other insider information, the terms of disclosure of which are not determined by the legislation of the Republic of Kazakhstan and (or) the rules of the auction organizer, shall be subject to disclosure by the Bank as soon as possible, if the illegal distribution or leakage of such information will affect the change in the value of securities (derivative financial instruments) of the Bank or affect its activities.

58. When disclosing insider information through its placement (publication) through several sources, the list of which is established by these Rules, the date of disclosure of insider information is the date of the first placement (publication) of insider information.

59. Insider information of the Bank published on the Bank's Internet resource must be available to an unlimited number of persons within one year from the date of publication.

60. When circulating securities (derivative financial instruments) of the Bank in the trading system of the stock exchange operating in the Republic of Kazakhstan, messages involving the disclosure of insider information among a wide range of persons are sent to the address of the stock exchange operating in the Republic of Kazakhstan, after which they are placed on the Bank's Internet resource www.altyni.kz.

When circulating securities (derivative financial instruments) of the Bank simultaneously in the trading systems of the stock exchange operating in the territory of the Republic of Kazakhstan and stock exchanges operating in the territory of foreign states, messages involving the disclosure of insider information among a wide range of persons are sent simultaneously to all stock exchanges, the lists of which include the Bank's securities, after which they are placed on the Bank's Internet resource www.altyni.kz.

Chapter 11. Postponement of disclosure of the Bank's insider information

61. In cases not contrary to the legislation of the Republic of Kazakhstan, in order to protect the Bank's legal rights, the Bank may, under its own responsibility, postpone the disclosure of insider information, provided that:

- 1) such a delay will not mislead the public/investors as to the financial condition of the Bank;
- 2) information is provided on a confidential basis;
- 3) The Bank is able to ensure the confidentiality of this information.

62. For the purposes of paragraph 61 of these Rules, protection of legal rights means postponing the disclosure of the Bank's insider information due to negotiations (including, but not limited to, negotiations aimed at maintaining a stable financial position of the Bank), when public disclosure of such information may have a negative impact on the outcome or course of such negotiations, as well as postponing the disclosure of insider information in the event that the Management Board of the Bank makes a decision that is subject to approval by the Board of Directors of the Bank, when public disclosure of such a decision with notification of its forthcoming approval entails the risk of an incorrect assessment of such information by investors.

63. A slight delay in the disclosure of insider information is allowed to clarify the circumstances in cases where the Bank has encountered any unexpected significant event, if such a delay in the disclosure of insider information does not contradict the requirements of the legislation of the Republic of Kazakhstan.

64. The relevant division responsible for the disclosure of certain insider information in accordance with the Bank's internal regulations shall ensure the publication of a preliminary information notice if there are reasons to believe that unauthorized disclosure of insider information is possible before the facts are established and the situation is assessed, and also in cases where disclosure of insider information came from persons to whom this information was entrusted on a confidential basis or there is a threat of such disclosure.

65. The heads of the responsible units inform the Compliance Department by sending an appropriate memo about the occurrence of such cases.

66. When publications and information appear in the media based on information constituting insider information and being largely reliable, the Bank shall assess the need to cancel the postponement of disclosure of such information in the manner prescribed by these Rules.

67. The decision to postpone or cancel the postponement of disclosure of insider information is made by the Chairman of the Management Board of the Bank (a person replacing him).

Chapter 12. Liability for misuse of insider information

68. In case of non-compliance with the restrictions specified in Chapter 8 of these Rules, misuse and dissemination of insider information, the persons who committed such violations are subject to civil, administrative and other liability provided for by the legislation of the Republic of Kazakhstan.

69. Insiders who are employees of the Bank may also be subject to disciplinary liability in accordance with the labor legislation of the Republic of Kazakhstan.

Chapter 13. Final provisions

70. These Rules come into force from the date of their approval by the Board of Directors of the Bank and cease to have effect from the date they are recognized as invalid in the prescribed manner.

71. These Rules are subject to change and / or addition as the legislation of the Republic of Kazakhstan is changed and / or supplemented.