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**Internal control rules for the disposal and use of insider information**

**Joint Stock Altyn Bank ( Subsidiary ) China Citic Bank Corporation Limited)**

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## Chapter 1. General Provisions

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1. Internal Control Rules for the Management and Use of Insider Information in Altyn Bank Joint Stock Company (Subsidiary Bank of China Citic Bank Corporation Limited ) (hereinafter referred to as the Rules) have been 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 Disclosure of Information Related to 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 concerning the Bank's activities that is not publicly available, if this information, due to the consequences for the Bank's property and financial position, is capable of influencing the value of securities (derivative financial instruments) issued (provided) by the Bank.

2. Issues not regulated by these Rules shall be regulated in accordance with the legislation of the Republic of Kazakhstan and the 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 Bank's insider information and these Rules, these Rules are posted in the state and Russian languages on the Internet resource of the Far Eastern Federal District and on the Internet resource of the stock exchange operating in the territory of the Republic of Kazakhstan (in the event that the Bank's securities (derivative financial instruments) are included and listed on this stock exchange), and are also provided by the Bank at the request of interested persons free of charge, with the exception of a fee for providing copies of the Rules in an amount not exceeding the cost of their production.

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

## Chapter 2. Basic concepts and terms

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5. Basic concepts and terms used in these Rules:

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

2) *DFO* is a depository of financial statements, 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 the securities or derivative financial instruments of the Bank, transactions with them, as well as about the Bank as their issuer, information about the activities carried out by it, constituting a commercial secret, as well as other information not known to third parties, the disclosure of which may affect the change in the value of securities and/or derivative financial instruments of the Bank, as well as the activities of the Bank;

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 relation to whom the Bank is recognized as an insider, transactions with them, as well as other information unknown to third parties, the disclosure of which may affect the change in the value of securities (derivative financial instruments) and the activities of persons in relation to whom the Bank is recognized as an insider;

5) *insider* – a person who has access to insider information;

In the event that 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 work duties, have access to insider information of the person in relation to whom the Bank is recognized as an insider, are also recognized as insiders of such person;

6) *Responsible departments*:

- ✓ Internal Audit Department,
- ✓ Compliance Department
- ✓ Department of the Treasury,
- ✓ Department of Information Technology,
- ✓ Department of Information Security,
- ✓ Department of Controlling and Budgeting,
- ✓ Department of Financial and Operational Risks,
- ✓ Directors of Bank branches,
- ✓ Legal Department,
- ✓ Business risk management of the retail business block,
- ✓ Business Risk Management of the Operational and Financial Block,
- ✓ Accounting Department,
- ✓ Treasury back office management;

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

8) *employees* – employees of the Bank under employment contracts;

9) *Leaders employees of the Bank* – the first manager and members of the Board of Directors, the first manager and members of the Management Board, other managers 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 managers of separate divisions of the Bank and their chief accountants, the Chief Accountant of the Bank. At the same time, they are not managers Bank employees are persons who have the right to sign documents on the basis of which banking operations are carried out and who exercise control over the activities of only one structural division.

### **Chapter 3. Goals and objectives**

6. The purpose of these Rules is to ensure that the Bank complies with the legislation of the Republic of Kazakhstan regulating the use of insider information, as well as to improve the level of business reputation, maintain a high level of corporate governance, and ensure the stability of the Bank.

7. These Rules define the list of insider information of the Bank, establish the procedure for monitoring the disposal and use of insider information of the Bank and other persons in relation to whom the Bank is recognized as an insider, the procedure and conditions for its disclosure, maintaining a list of insiders, define the restrictions established for insiders, as well as liability for disclosure of insider information.

### **Chapter 4. List of information related to insider information**

8. The following information is considered to be insider information of the Bank:
- 1) financial statements of the Bank;
  - 2) other information, in addition to financial statements, regarding the financial position of the Bank, including, but not limited to, information on the calculation of the capital adequacy ratio, information on compliance with prudential standards;
  - 3) information on changes in the Bank's activities 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 Bank’s voting shares;
    - c) reorganization or liquidation of the Bank;
    - d) seizure of the Bank's property;

- e) transfer of collateral (re-pledging) of the Bank's property in an amount equal to ten percent or more of the Bank's assets;
- f) obtaining, suspension or revocation of the Bank's license;
- g) decisions of the general meeting of shareholders of the Bank;
- h) decisions taken by the Board of Directors on a list of issues, information about which, in accordance with the Bank's internal documents, must be communicated to shareholders and investors;
- i) changes in the list of organizations in which the Bank owns ten or more percent of the shares (interests, stakes) of each such organization;
- j) changes to the prospectus for the issue of securities;
- k) information on the Bank's failure to comply with the conditions stipulated in 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 the Bank's corporate events:
  - a) decisions taken by the General Meeting of Shareholders;
  - b) decisions taken by the Board of Directors on a list of issues, information about which, in accordance with the Bank's internal documents, must be communicated to shareholders and investors;
  - c) issue of shares and other securities by the Bank and approval by the authorized body of reports on the results of the placement of the Bank's securities, reports on the results of the redemption of the Bank's securities, cancellation by the authorized body of the Bank's securities;
  - d) the Bank's execution of major transactions and transactions that simultaneously meet the following conditions: they are transactions in the execution of which the Bank has an interest and are related to the acquisition or alienation of property, the value of which is ten percent or more of the total book value of the Bank's assets on the date of the decision by the authorized body of the Bank to conclude such transactions;
  - e) information about a transaction resulting in the acquisition or alienation of property worth ten percent or more of the Bank's assets must include information about the parties to the transaction, the assets acquired or alienated, the terms and conditions of the transaction, the nature and volume of the shares of the parties involved, and, if any, other information about the transaction;
  - f) transfer of collateral (re-pledging) of the Bank's property in an amount equal to five percent or more of the Bank's assets;
  - g) receipt by the Bank of a loan in an amount equal to twenty-five percent or more of the Bank's equity capital;
  - h) obtaining by the Bank of permits to carry out any types of activities, suspension or termination of permits previously received by the Bank to carry out any types of activities;
  - i) participation of a 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 percent or more of the total assets of the Bank;
  - l) bringing the Bank and its officials to administrative responsibility;
  - m) initiation of a corporate dispute case in court;
  - n) decisions on the forced 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 prospectus for the issue of the Bank's securities.
- 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 arises until the moment it is disclosed to an unlimited number of persons in accordance with the legislation of the Republic of Kazakhstan and/or these Rules.
- 11. The Bank's insider information does not include:

- 1) information prepared on the basis of publicly available information, including research, forecasts and assessments regarding the value of a security (derivative financial instrument), the property status of the Bank, produced for the purpose of making investment decisions and (or) preparing recommendations or proposals for carrying out transactions with securities (derivative financial instruments);
- 2) information obtained from the media;
- 3) unconfirmed information, the source of which is unknown, disseminated 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**

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12. The following persons are recognized as insiders:
  - 12.1. **In the Bank :**
    - 1) members of the Board of Directors,
    - 2) members of the Board,
    - 3) members of the Bank Committees (except for members of the Personnel and Remuneration Committee),
    - 4) Chief accountant,
    - 5) Chief Risk Manager,
    - 6) Chief Compliance Officer,
    - 7) Corporate Secretary;
    - 8) Managing Directors;
    - 9) Heads of Blocks; Directors of Departments;
    - 10) heads of independent Directorates/Departments;
    - 11) assistants to members of the Board of Directors and the Management Board;
    - 12) Secretaries of the Management Board and Committees of the Bank (except for the Personnel and Remuneration Committee);
    - 13) employees of Responsible departments;
    - 14) an employee of a Bank division that is not related to the Responsible Divisions, but:
      - having access to insider information temporarily, due to his participation in the relevant project;
      - classified as an insider by decision (opinion) of his manager, due to the official position and/or work duties of the employee .
  - 12.2. **Outside the Bank/other persons :**
    - 1) employees of the issuer who have access to insider information due to their official position and work duties;
    - 2) persons who have access to insider information by virtue of owning, using and/or disposing, directly or indirectly, of ten or more percent of the voting shares (interests in the authorized capital) of the issuer;
    - 3) an audit organization, an appraiser, professional participants in the securities market and other persons providing services to the issuer in accordance with a concluded agreement (including an oral one), the terms of which provide for the disclosure of insider information;
    - 4) an organizer of trades whose list includes securities (derivative financial instruments) issued (provided) by the issuer;
    - 5) members of the board of directors and the listing committee of the stock exchange, in the trading system of which transactions with the issuer's securities and other financial instruments are concluded;
    - 6) employees of the authorized body, the National Bank of the Republic of Kazakhstan and its departments, civil servants who have access to insider information by virtue of the functions and powers granted to them;

7) public associations and professional organizations, whose members are issuers and organizations specified in subparagraphs 2), 3) and 4) of this subparagraph, which, by virtue of the powers granted to them, have access to insider information;

8) employees of organizations specified in subparagraphs 2), 3), 4) and 7) of this subparagraph, who have access to insider information by virtue of their official position and work duties;

9) persons who have received insider information from persons specified in subparagraphs 1) - 8) of this subparagraph.

## **Chapter 6. Procedure for maintaining and updating the list of persons with access to the Bank's insider information**

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

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

15. The Bank's insiders specified in subparagraphs 3) - 5), 8), 9) of paragraph 12.2 of these Rules are required to provide the Bank with a list of their employees who, by virtue of their official position and job responsibilities, 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 amendments to it in the event of an update.

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

17. The division 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 the disposal and use of insider information and these Rules is the Compliance Department.

18. In the event that the Bank's employees included in the Bank's insider list on a permanent basis receive access to another category of insider information on a temporary basis (for example, due to their participation in a project), a repeated notification of the inclusion/exclusion of such employees from the insider list shall be sent not required.

19. Access to the list of insiders is available to responsible employees of the Compliance Department.

20. In pursuance of subparagraph 12.2 and paragraph 40 of these Rules: when establishing civil law relations (concluding transactions, agreements) with persons to whom, within the framework of the established legal relations, the disclosure of insider information of the Bank is envisaged, the agreement concluded with the said persons may provide for the obligations of the said persons to maintain their list of insiders (employees who have access to the Bank's insider information by virtue of their official position and job responsibilities), to notify employees included by them in their list of insiders of inclusion/exclusion from the list, of liability for disclosure and/or illegal use of insider information, as well as the obligation to provide a copy of their list of insiders to the Bank in the manner and within the timeframes 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 insider information, as well as the head of the division responsible for establishing civil-legal relations with the persons specified in subparagraph 4) of paragraph 12 of

these Rules, are obliged, within 5 (five) business days before providing the said persons with access to insider information/terminating the right of access to insider information, to send a service note with the corresponding justification to the Compliance Department on the need to include them in the list of insiders/exclude them from the list of insiders of the Bank.

22. The final decision on the need to include/exclude such employees from 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 hiring and transfer of Bank employees. When an employee is dismissed, when signing the clearance sheet, the dismissed employee is required to undergo a check by the Compliance Department. If the dismissed employee is an insider, the employee signs a Notification of Exclusion from the List of Insiders in the form of Appendix No. 3 to these Rules.

## **Chapter 7. Procedure for interaction between the Bank and persons in relation to whom 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 it, a concluded agreement, the terms of which provide for the disclosure of this person's insider information to the Bank.

25. Employees of the Bank who, by virtue of their official position and work duties, have access to insider information of persons in relation to whom the Bank is recognized as an insider, are also insiders of the said persons.

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

27. In the event that 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 the disclosure of information that may be recognized as insider information if the Bank has not received a notification of its inclusion in the list of insiders from the person in relation to whom 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 the disposal and use of insider information of persons in relation to whom the Bank is recognized as an insider.

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

1) maintains a list of Bank employees who, by virtue of their official position and work duties, have access to insider information of the said persons;

2) informs the Bank's employees about the requirements of the legislation of the Republic of Kazakhstan and these Rules in terms of the prohibition on the use of insider information of persons in relation to whom the Bank is recognized as an insider;

3) informs persons in relation to whom the Bank is recognized as an insider about the Bank's employees who, by virtue of their official position and work duties, have access to the insider information of the said persons, in the manner and within the timeframes 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 relation to whom the Bank is recognized as an insider, the rules of internal control over the disposal and use of insider information.

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



32. Notification of Bank employees who have access to insider information of persons specified in paragraph 24 of these Rules shall be carried out by sending a corresponding service note.

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

34. Departments are required to keep the list of employees up to date and provide current 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 agreements, lists of employees who are insiders under agreements, as well as other information for the purposes of paragraph 29 of these Rules from the responsible departments. The requested information is provided by the responsible departments of the Compliance Department no later than 5 (five) days from the date of receipt of the request.

36. The exclusion of Bank employees from the list of insiders of persons in relation to whom the Bank is recognized as an insider is carried out in the event that the Bank receives a notification of 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, about which the responsible departments are obliged 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 conditions that prevent the use and/or disclosure of information constituting the Bank's insider information and/or insider information persons in relation to whom the Bank is recognized as an insider.

38. Insiders do not have the right to:

- 1) use insider information when making transactions with securities (derivative financial instruments);
- 2) transfer to third parties or make available to third parties insider information, except in cases stipulated by the laws of the Republic of Kazakhstan;
- 3) provide recommendations to third parties regarding transactions in securities based on insider information.

39. Compliance with these Rules is monitored by:

- 1) Familiarization of employees with these Rules by posting them on the Bank's internal website, posting them on a network resource accessible to all employees, and informing employees by sending a notification via electronic document management;
- 2) Maintaining an up-to-date list of insiders by the Compliance Department.
- 3) Taking measures against insiders in the event that they commit actions prohibited by these Rules and legislation, including, but not limited to: requiring compliance with these Rules, implementing measures to strengthen control over compliance with the requirements of these Rules, disciplinary measures, and other measures.
- 4) Control over the prevention of the possibility of unauthorized access and use of the Bank's insider information specified in Chapter 4 of these Rules.

40. Insiders specified in subparagraph 12.2 of these Rules are obliged to:

- 1) maintain a list of its employees who, by virtue of their official position and work 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, by virtue of their official position and work duties, have access to the Bank's insider information, in the manner and within the timeframes established by these Rules.

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

42. The list of the Bank's insiders shall be submitted to the state body implementing state regulation, control and supervision of the financial market and financial organizations, upon its written request within the timeframes specified in the request, with the disclosure of information on persons having access to insider information.

43. The list of insiders of the Bank, provided to the state body implementing state regulation, control and supervision of the financial market and financial organizations, must contain the following information on persons who have access to the insider information of the Bank:

- 1) the surname, first name, and, if available, patronymic of an individual, his/her date of 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 basis for including a person in the list of insiders, in accordance with which the person is defined as an insider;
- 4) the date on which the basis for inclusion in the list of insiders arose;
- 5) date of exclusion from the list of insiders.

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

44. The heads of responsible divisions of the Bank, employees of the Bank who have 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 require this information to perform their official duties, as well as 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 being 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 work duties of the employee.

46. The heads and employees of responsible departments who are insiders of the Bank are personally responsible for the completeness and accuracy of the information provided to the Compliance Department, as well as for meeting the deadlines for its provision and maintaining it up to date (including in terms of the relevance of the insider details).

47. In order to ensure the confidentiality of insider information, a project whose content is related to insider information may be assigned a specific code name, which is subsequently used by project participants.

48. Upon establishing a threat or fact of unauthorized disclosure of insider information or loss of documents (information carriers) containing insider information, the insider - 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 about this.

49. Bank employees who have access to insider information should not conduct discussions concerning insider information in the presence of persons who do not have 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 to perform such actions by the relevant order of the Chairman of the Management Board of the Bank, may participate in meetings with analysts and investors where insider information may be used, as well as provide official interviews to the media.

## Chapter 10. Procedure and terms for disclosure of insider information

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

Publicly available information on the Bank's activities means information that does not require or have any 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 Far Eastern Federal District Internet resource, or that is not related to information for which the legislative acts of the Republic of Kazakhstan do not establish the procedure and terms for its disclosure, is disclosed in the manner and within the timeframes 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](http://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 open access for all interested persons.

54. When including securities (derivative financial instruments) of the Bank in the list of a 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 the securities (derivative financial instruments) issued (provided) by it, the disclosure of which will affect the change in their value and the activities 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 on changes in the Bank's activities affecting the interests of holders of its securities, specified in subparagraph 3) of paragraph 8 of these Rules, shall be 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](http://www.altyni.kz), within 15 (fifteen) calendar days from the date of occurrence of such changes.

56. Insider information about the Bank's corporate events, specified in subparagraph 4) of paragraph 8 of these Rules, shall be posted on the Far Eastern Federal District Internet resource within the timeframes established by the legislation of the Republic of Kazakhstan.

57. Other insider information, the disclosure periods for which are not determined by the legislation of the Republic of Kazakhstan and (or) the rules of the trading organizer, is subject to disclosure by the Bank as soon as possible if the illegal dissemination or leakage of such information affects the change in the value of the securities (derivative financial instruments) of the Bank or affects its activities.

58. When disclosing insider information by posting (publishing) it through several sources, the list of which is established by these Rules, the date of disclosure of insider information shall be considered to be the date of the first posting (publication) of the insider information.

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

60. When securities (derivative financial instruments) of the Bank are traded in the trading system of the stock exchange operating in the territory of 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 territory of the Republic of Kazakhstan, after which they are posted on the Bank's Internet resource [www . altyni . kz](http://www.altyni.kz).

When securities (derivative financial instruments) of the Bank are traded 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 whose lists include the Bank's securities, after which they are posted on the Bank 's Internet resource [www.altyni.kz](http://www.altyni.kz).

## **Chapter 11. Delay in Disclosure of Bank Insider Information**

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61. In cases that do not contradict the legislation of the Republic of Kazakhstan, in order to protect the Bank's legal rights, the Bank may, at its own risk, delay the disclosure of insider information, provided that:

- 1) such a deferment will not mislead the public/investors regarding 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 the postponement of disclosure of insider information of the Bank due to negotiations (including, but not limited to, negotiations aimed at maintaining the 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 the postponement of disclosure of insider information in the event of the adoption by the Bank's Management Board of a decision that is subject to approval by the Board of Directors of the Bank, when public disclosure of such a decision with notice of its upcoming approval entails the risk of an incorrect assessment of such information by investors.

63. A short 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 regulatory documents shall ensure the publication of a preliminary information message if there are grounds to believe that unauthorized disclosure of insider information is possible before the facts are established and the situation is assessed, as well as in cases where the disclosure of insider information occurred on the part of 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 departments inform the Compliance Department by sending a corresponding memo about the occurrence of such cases.

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

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

## **Chapter 12. Liability for Misuse of Insider Information**

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68. In case of non-compliance with the restrictions specified in Chapter 8 of these Rules, unlawful use and dissemination of insider information, persons who have committed such violations shall be 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 action in accordance with the labor legislation of the Republic of Kazakhstan.

### **Chapter 13. Final Provisions**

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70. These Rules shall enter into force on the date of their approval by the Board of Directors of the Bank and shall cease to be effective on the date of their recognition as invalid in accordance with the established procedure.

71. These Rules are subject to change and/or supplementation as the legislation of the Republic of Kazakhstan changes and/or supplements.

Appendix 1 "List of Insiders"

to the Internal Control Rules  
for disposal and use  
insider information in

JSC Altyn Bank ( DB China Citic Bank Corporation Ltd)

For legal entities

List of legal entities with access to insider information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd ) on _____.							
No.	Name of the legal entity		Location	Details of the document confirming state registration (re-registration) of a legal entity	Reason for inclusion in the list	Date of occurrence of the basis for inclusion in the insider list	Date of delisting

For individuals

List of individuals with access to insider information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd ) on _____							
No.	Surname, first name, patronymic of the person	Job title	Date of birth	Name of the legal entity, its location, details of the document confirming state registration (re-registration) of the legal entity	Reason for inclusion in the list	Date of occurrence of the basis for inclusion in the insider list	Date of delisting

Appendix 2  
to the Internal Control Rules  
for disposal and use  
insider information

V JSC Altyn Bank ( DB China Citic Bank Corporation Ltd)

Confidentially

**Notification of inclusion of a person in the list of insiders**  
JSC Altyn Bank ( DB China Citic Bank Corporation Ltd)

Date of notification:

«\_ \_» \_ 20\_\_

Due to the fact that you have access to insider information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd) (hereinafter referred to as the Bank), you are included in the list of insiders of the Bank in accordance with the requirements of the legislation of the Republic of Kazakhstan and the Rules of Internal Control over the Disposition and Use of Insider Information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd)

If access to insider information is terminated, you will be excluded from the list of Bank insiders, of which you will be informed in writing.

**Insider information** – reliable information about the Bank’s securities or derivative financial instruments, transactions with them, as well as about the Bank as their issuer, information about the activities carried out by it, constituting a commercial secret, as well as other information not known to third parties, the 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;

The Bank is obliged to take the necessary measures to familiarize persons who have gained access to insider information with the legal consequences of possessing such information, including sanctions for the unlawful use or dissemination of insider information.

***Restrictions on the use of insider information***

As an insider of the Bank, you do not have the right to:

- 1) use insider information when making transactions with securities (derivative financial instruments);
- 2) transfer to third parties or make available to third parties insider information, except in cases stipulated by the laws of the Republic of Kazakhstan;
- 3) provide third parties with recommendations on transactions with securities based on insider information.

***Commitment to maintain confidentiality***

Insider information that you possess or will possess in the future is strictly confidential and is not subject to disclosure to third parties. You must take all available effective measures to limit access of unauthorized persons to insider information.

***Liability for misuse of insider information***

In case of non-compliance with the above restrictions, unlawful use and dissemination of insider information, you may be subject to civil, administrative and other liability provided for by the legislation of the Republic of Kazakhstan, and in relation to you, if you are an employee of the Bank, disciplinary sanctions may be applied in accordance with the labor legislation of the Republic of Kazakhstan.

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By signing this letter, you confirm acceptance of the above restrictions established by the legislation of the Republic of Kazakhstan in relation to insiders, as well as acceptance of the above obligations regarding non-disclosure of insider information and familiarization with the sanctions for the illegal use and dissemination of insider information.

Please sign and return this signed notice to the Bank no later than 5 business days from the date of receipt of this notice. By signing this notice, in accordance with the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V "On personal data and their protection" (hereinafter referred to as the Law), I give the Bank my consent to the collection and processing of my personal data, including, but not limited to, the provision of my personal data to authorized bodies and organizations in accordance with the requirements of regulatory legal acts of the Republic of Kazakhstan, Kazakhstan Stock Exchange JSC and the shareholder of the Bank and its subsidiaries, as well as to the cross-border transfer of my personal data, including in accordance with subparagraph 1) of paragraph 3 of Article 16 of the Law.

.....  
(Full name, signature, date of birth)

.....  
(Date)

to the Rules of Internal Control over Disposal  
and the use of insider information  
in JSC " Altyn" Bank » (DB China Citic Bank Corporation Ltd )

**Notification of exclusion of a person from the list of insiders  
of Altyn Bank JSC (DB China Citic Bank Corporation Ltd )**

Date of notification:

« \_\_\_\_\_ » \_\_\_\_\_ 20 \_\_\_\_

Due to your official position and job responsibilities, you had access to insider information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd ) (hereinafter referred to as the Bank) and were included in the list of insiders of the Bank in accordance with the requirements of the legislation of the Republic of Kazakhstan and the Rules of Internal Control over the Disposition and Use of Insider Information of Altyn Bank JSC (DB China Citic Bank Corporation Ltd. ).

Due to the termination of the employment contract (order dated \_\_\_\_\_ No. \_\_\_\_\_), you have been excluded from the list of Bank insiders.

***Commitment to maintain confidentiality***

The inside information you possess is strictly confidential and will not be disclosed.

***Liability for misuse of insider information***

In case of non-compliance with confidentiality requirements, unlawful use and dissemination of insider information, you may be subject to civil, administrative and other liability provided for by the legislation of the Republic of Kazakhstan.

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By signing this letter, you confirm acceptance of the above restrictions established by the legislation of the Republic of Kazakhstan in relation to insiders, as well as acceptance of the above obligations on non-disclosure of insider information and familiarization with the sanctions for the unlawful use and dissemination of insider information.

Please sign and return this signed notice to the Bank no later than 5 working days from the date of receipt of this notice.

.....  
(Full name, signature)

..... (date)