

## **1. Control over disposal and usage of the inside information of the Company**

1.1. Access to the inside information of the Company shall be granted to the insiders based on concluded labor contracts and/or civil law agreements, stipulating provisions on retention of confidentiality of the inside information of the Company.

1.2. The persons included into the insider list, shall use the inside information only in compliance with these Rules and the existing laws.

1.3. Heads of structural divisions of the Company who use the inside information in their operations, shall ensure filing of the inside information in the conditions ensuring the respective confidentiality regime for the inside information.

1.4. Heads of structural divisions of the Company who possess access to the inside information, shall ensure adoption of respective measures for limiting access to such information on behalf of the employees who do not need this information in the course of their job operations.

1.5. All employees of the Company shall carry out the following measures of control and reasonable caution actions for the purpose of limiting access to and protection of the inside information:

1) not transfer any third parties the information on transactions with involvement of the Company;

2) carry out operations by the ways which exclude the risk of unintentional disclosure of the inside information, for instance, exclude situations of reviewing the inside information in public places;

3) limit access to documents containing the inside information of the Company for other employees of the Company, taking into account the extent of official needs, especially considering the insider status;

4) immediately take out and delete all documents from the public spaces after completion of meetings;

5) limit access to the premises where confidential documents and inside information is stored or may be used;

6) not discuss the inside information in public places, such as elevators, restaurants, aircrafts or taxis.

1.6. In case of detecting threat or facts of unauthorized disclosure of the inside information or loss of documents (data storage devices) which contain the insider information, employees of the Company shall immediately report to the line manager, staff of the Security Department, about any facts which they became aware of:

1) about the inside information of the Company which is not subject to disclosure due to their job responsibilities, but became known to them, including the one from customers or other persons;

2) about access to the inside information of the persons who do not have such rights;

3) about unauthorized usage of the inside information of the Company, including usage of the inside information of the Company for the personal interests of the Company's employees, Company's insiders, Company's customers and partners, as well as for the interests of relatives of any of the noted persons.

## **2. Responsibility for undue usage of the Inside Information of the Company**

2.1. In case of undue usage and/or disclosure of the inside information, the person who committed such breach, shall be liable in accordance with the laws of RK and/or laws of the country, at which territory the transaction with the Company's securities took place, as well as in accordance with the internal documents of the Company and conditions of agreements and contracts concluded by the Company.

2.2. The Company shall be entitled to demand from the insiders guilty of the usage, disclosure, distribution or other circulation of the Inside Information of the Company, to recover the damage incurred by the Company due to the noted illegitimate actions.