

**Rules for internal control over the disposal
and use of insider information
of KMF Bank JSC**

Business owner:	Compliance Control Unit
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Section 1. General provisions

1. These Rules of Internal Control over the Disposal and Use of Insider Information of KMF Bank JSC (the “Rules”) were developed in accordance with the Law of the Republic of Kazakhstan “On Securities Market” (the “Securities Market Law”), Law “On Joint-Stock Companies”, Law “On Banks and Banking Operations in the Republic of Kazakhstan”, other normative legal acts of the Republic of Kazakhstan and internal regulations of KMF Bank JSC (the “Bank”).

2. The goal of these Rules is to maintain compliance of the Bank with the legislation of the Republic of Kazakhstan regulating the matters related to insider information disposal and use, as well as to improve the business reputation, maintain a high degree of corporate governance, and ensure stability of the Bank.

3. These Rules determine:

- 1) the list of information considered insider information;
- 2) the procedure and time frames of insider information disclosure;
- 3) delineating the right to access insider information and preventing unlawful use of this information by insiders;
- 4) the procedure for maintaining and updating the list of persons with access to insider information, as well as their removal from the list;
- 5) procedure and terms of notifying persons in cases of their inclusion (exclusion) from the list of persons with access to insider information, as well as informing persons about the requirements of this Law on the Securities Market and Internal Control Rules regarding the disposal and use of insider information;
- 6) procedure and terms of providing information by legal entities recognized as insiders about their employees who have access to insider information through their official position and labor duties;
- 7) other provisions that allow control over the disposal and use of insider information.

4. The subdivision responsible for coordinating the functions of the subdivisions within the Rules is the compliance control subdivision.

4-1. Responsibility for ensuring compliance with the requirements of these Rules rests with the head of the unit that possesses the inside information and/or is responsible for taking measures to ensure compliance with the legislation of the Republic of Kazakhstan, as well as with the Bank’s executives overseeing such units.

5. These Rules, in the state and Russian languages, are posted on the Bank’s website (<https://kmf.kz/>), on the website of the financial statement repository, and/or on the website of a stock exchange operating within the Republic of Kazakhstan (in the event that the Bank’s securities (derivative financial instruments) are included and listed on such stock exchange), and are also provided by the Bank upon the

request of interested parties in accordance with the legislation of the Republic of Kazakhstan.

6. The following terms and definitions are used in these Rules:

1) Bank – KMF Bank JSC;

2) Deleted;

3) insider information - reliable information about securities (derivative financial instruments), transactions with them, as well as about the issuer that issued (provided) securities (derivative financial instruments), 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 (derivative financial instruments) and the activities of their issuer;

4) exchange, KASE – Kazakhstan Stock Exchange JSC – the legal entity, established in the legal form of a joint-stock company, which ensures organizational and technical support for trading by directly conducting the trade with the use of this organizer's trading systems;

5) DFS – depository of financial statements;

6) public information – information that does not have nor require access restrictions or information that is subject to disclosure in accordance with the legislation of the Republic of Kazakhstan;

7) insider list – list of parties with access to insider information of the Bank, which is formed and updated in accordance with the Rules;

8) authorized body – the Agency of the Republic of Kazakhstan for Regulation and Development of Financial Market;

9) notification – a letter containing a notice about the inclusion of the parties in the insider list in accordance with the form provided in Appendices 2 and 3 to these Rules.

Section 2. Insiders of the Bank

7. Parties recognized as insiders include:

1) members of the Board of Directors and the Management Board;

2) the Bank's senior management, the Bank's Chief Accountant, the Bank's managing and executive directors who are not members of the Management Board, the Chief Compliance Officer, the heads of organizational units and their deputies (if any) who have access to insider information, and the directors of branches and their deputies (if any);

3) assistants/secretaries/advisors to the Chairperson of the Management Board, members of the Management Board, Chairperson and members of the Board of Directors;

4) heads and employees of the subdivisions of the Bank specified in Appendix 4 to these Rules, as well as other employees of the Bank who have access to insider information by virtue of their official position and labor duties;

5) secretaries of committees to the Management Board;

6) members and secretaries of committees under the Bank's Management Board (excluding branch committees);

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

7-1) Bank employees not listed in subparagraphs 1) through 6) of this paragraph who have temporary access to insider information due to their participation in a relevant project;

8) an auditing firm, an appraiser, professional securities market participants, and other persons providing services to the Bank pursuant to a concluded agreement (including an oral agreement), the terms of which provide for the disclosure of insider information;

9) a trading organizer whose list includes securities (derivative financial instruments) issued (provided) by the Bank;

10) members of the board of directors and the listing committee of a stock exchange in whose trading system transactions involving the Bank's securities and other financial instruments are concluded;

11) employees of the authorized body, the National Bank of the Republic of Kazakhstan and its agencies, and government officials who have access to insider information by virtue of their functions and authority;

12) public associations and professional organizations whose members include the Bank and the organizations specified in subparagraphs 7), 8), and 9) of this paragraph, and which, by virtue of the powers granted to them, have access to insider information;

13) employees of the organizations specified in sub-clauses 7), 8), 9), and 12) of this clause who have access to inside information by virtue of their official position and employment duties;

14) persons who have received inside information from the aforementioned persons.

8. The persons specified in subparagraphs 7)–14) of paragraph 7 of the Rules shall be considered insiders until the disclosure of the inside information to which they have been granted access.

The head of the Bank's structural subdivisions shall, no later than 3 business days from the date on which an employee is granted or denied access to inside information, submit to the compliance control unit information on the need to

include the employee in the list of insiders or to exclude the employee from such list. The Bank and persons recognized as insiders of the Bank, including temporarily, shall ensure the confidentiality of inside information and comply with the restrictions on its disposal and use until the moment of its official disclosure (publication) or until such information ceases to have the status of inside information in accordance with the requirements of the legislation of the Republic of Kazakhstan.

10-1. The persons covered by these Rules shall be included in the Bank's list of insiders from the moment the grounds for recognizing them as insiders arise and/or from the moment they obtain access to inside information.

10-2. A person shall be excluded from the list of insiders from the moment the relevant grounds cease to exist and/or access to inside information is terminated. Inclusion of a person in the list of insiders or exclusion therefrom shall not relieve such person of the obligation to comply with the restrictions applicable to the inside information obtained until the moment of its official disclosure or until such information ceases to have the status of inside information.

Section 3. Maintenance of the Insider List

9. To ensure control over the handling and use of insider information of the Bank and the securities (derivatives) issued by it, the Bank shall maintain and update a list of parties who have access to insider information in accordance with the form specified in Appendix 1 to the Rules (the "Insider List of the Bank").

10. The compliance control subdivision shall be the subdivision responsible for maintaining the Insider List of the Bank, keeping it up to date, notifying the parties who have gained access to insider information of the Bank about their inclusion in (exclusion from) the insider list, informing insiders about the requirements of the legislation of the Republic of Kazakhstan regarding handling and use of insider information, as well as these Rules.

11. The Insider List is compiled and kept up to date by the compliance control subdivision based on the information provided by the insiders – employees of the Bank through a memo in the electronic document management system by the following structural subdivisions:

1) pursuant to subparagraph 1) of paragraph 7 of these Rules – information regarding the need to include persons in or exclude them from the insider list shall be provided by the Corporate Secretary Service no later than 3 working days from the date of signing the minutes on the election or early termination of the powers of members of the Board of Directors or the Management Board of the Bank;

2) according to sub-paragraphs 2), 3) and 5) of paragraph 7 of the Rules – information regarding the need to include/exclude is provided by the human resource

subdivision no later than one (1) business day from the day of issue of the employment order;

3) according to sub-paragraph 6) of paragraph 7 of the Rules – information regarding the need to include/exclude is provided by a secretary of such body no later than 2 (two) business days from the day of the decision-making;

4) according to sub-paragraph 7) of paragraph 7 of the Rules – information regarding the need to include/exclude the parties in/from the insider list is provided by the treasury subdivision no later than 3 (three) business days from the day of the registration in the Integrated Securities Registrar;

5) according to sub-paragraph 8) of paragraph 7 of the Rules – information regarding the need to include/exclude the parties in/from the insider list is provided no later than 3 (three) business days from the day of the signing of the relevant agreement by:

a) the subdivision initiating the signing of an appraisal agreement – regarding appraisal organizations;

b) the regulatory and IFRS reporting subdivision – regarding audit organizations;

c) the treasury subdivision – regarding the professional participants of the securities market;

d) regarding other parties that provide services to the Bank in accordance with the signed contract (including verbal agreement) mentioned in sub-paragraph 8) of paragraph 7 of the Rules – information regarding the need to include or exclude parties in/from insider list is provided by structural subdivisions that signed such agreements on behalf of the Bank;

6) according to sub-paragraph 9) of paragraph 7 of the Rules – information regarding the need to include or exclude parties in/from the insider list is provided by the treasury subdivision no later than three (3) business days from the day the securities (derivatives) are included in the trading organizer's list.

12. The following persons are recognized as insiders of the Bank and provide information to the Bank by sending information to the e-mail address compliance@kmf.kz.

1) persons who have access to insider information by virtue of their direct or indirect ownership, use, and/or disposal of ten percent or more of the voting shares (or equity interests in the authorized capital) of the Bank;

2) audit firms, appraisers, professional securities market participants, and other persons providing services to the Bank under a contract (including an oral one) that stipulates the disclosure of insider information;

3) trading organizers that have listed securities (or derivative financial instruments) issued (or provided) by the Bank;

4) public associations and professional organizations of which the Bank and the entities specified in sub-clauses 1) through 3) of this clause are members, and which, by virtue of the powers granted to them, have access to the Bank's insider information;

13. Information received by the Bank from the parties specified in paragraph 14 of these Rules contains the following information:

- for individuals

1) last name, first name and patronymic (if any);

2) IIN;

3) date of birth;

4) rationale of inclusion in the list of insiders of the Bank;

5) date of origination of rationale for inclusion in the list of insiders of the Bank/date of exclusion from the list of insiders of the Bank.

- for legal entities:

1) name of the legal entity;

2) BIN;

3) details of the document confirming the official (re-)registration of the legal entity;

4) rationale of inclusion in the list of insiders of the Bank;

5) date of origination of rationale for inclusion in the list of insiders of the Bank/date of exclusion from the list of insiders of the Bank.

14. The compliance control subdivision, after receiving information from the structural subdivisions, shall make entries in the insider list no later than three (3) business days after the day when such information was received.

15. The managers and employees of the structural subdivisions of the Bank that are recognized as insiders of the Bank are personally responsible for the completeness and accuracy of the data provided to the compliance control subdivision, as well as for meeting the deadlines of its submission and keeping it up to date (including the relevance of insider details).

16. The insider list must be updated by the compliance control subdivision in the following cases:

1) if the rationale of a party's inclusion in the insider list changed;

2) if a party that is not on the insider list gained access to insider information;

3) if a party that is included in the insider list loses its access to insider information.

17. The compliance control subdivision notifies insiders about their inclusion in insider list of the Bank and the requirements of the Law on securities market and the Rules by sending them a corresponding notice in accordance with Appendices 2, 3 to the Rules to the address known to the Bank (using a method that

allows to confirm the fact of receiving the notice by a recipient) or to an email address of a party included in/excluded from the insider list of the Bank.

18. Insiders of the Bank who are employees of the Bank are notified via the Bank's corporate email; when a Bank employee who is an insider is transferred to another position or dismissed, he/she is automatically excluded from the list of insiders without sending a notice.

19. The insider list is kept in the compliance control subdivision in accordance with the form provided in Appendix 1 to the Rules (as a soft or hard copy) for five years from the day of their creation. If it is necessary to provide a list of insiders on paper, the list of insiders shall be provided with the signature of the Chairman of the Board or the person replacing him.

20. The list of insiders shall be submitted by the Bank to the authorized body upon its written request within the terms specified in the request, with disclosure of information on persons having access to the insider information of the Bank.

20-1. Insiders who are employees of the Bank must sign and return the original notice to the Compliance Unit no later than three business days after receiving it. External insiders may sign and return the original notice to the Bank marked "For the Compliance Unit."

21. The List of Insiders of the Bank contains personal data and is a confidential document. Access to the Bank's insider list is provided in accordance with the Bank's internal regulatory documents governing the procedures for handling the Bank's confidential information and the main measures for organizing its protection within the Bank. The collection and processing of the personal data of insiders of the Bank is fulfilled in accordance with the Law of the Republic of Kazakhstan "On personal data and its protection" and regulatory legal acts of the Republic of Kazakhstan.

22. Insiders indicated in sub-paragraphs 7), - 9) and 12) of the paragraph 7 of these Rules must:

1) maintain the list of their employees having access to insider information of the Bank by virtue of their official position and duty, in relation to which these legal entities are recognized as insiders;

2) inform employees about the requirements of the Law on securities market and the Rules regarding the prohibition of the use of insider information and the Rules, in relation to which these legal entities are recognized as insiders;

3) inform the Bank, with respect to legal entities recognized as insiders, about their employees who by virtue of their official position and duty have access to insider information of the Bank, in the manner and within the time frames established by the Rules;

4) guarantee that the personal data of employees who have access to insider information of the Bank by virtue of their official position and duty, are collected and transferred to the Bank in accordance with the requirements of the Law of the Republic of Kazakhstan «On personal data and its protection».

Section 4. Insider Information

23. The following is recognized as insider information of the Bank:

- 1) information on securities of the Bank and transactions with them;
- 2) prospects for the issuance of equity securities of the Bank, including any amendments and/or supplements thereto;
- 3) report on the result of the placement of shares;
- 4) methodology for determining the value of shares upon their redemption by the Bank on an unorganized market;
- 5) financial statements and audit reports of the Bank;
- 6) other information that is not publicly available information and is not known to third parties, disclosure of which may affect changes in the value of the securities of the Bank and activities of the Bank;
- 7) information on corporate events of the Bank that includes the data regarding:
 - a) the decisions made during a general shareholder meeting;
 - b) the election of Board of Directors of the Bank, Management Board of the Bank with indication of the composition of Board of Directors of the Bank, Management Board of the Bank, as well as changes in the composition of Board of Directors of the Bank, Management Board of the Bank;
 - c) changes in the composition of shareholders owning ten or more percent of voting shares of the Bank;
 - d) conversion of securities and/or other monetary obligations of the Bank to ordinary shares of the Bank;
 - e) exchange of outstanding shares of the Bank of one type to shares of the Bank of another type;
 - f) changes in the list of organizations in which the Bank owns ten or more percent of shares of each of such organizations;
 - g) large-scale transactions made by the Bank and/or transactions that simultaneously satisfy the following conditions: interested party transactions that are associated with acquisition or disposal of a property the value of which amounts to ten or more of the total book value of assets of the Bank as of the date the authorized body of the joint-stock company makes a decision to conclude such transactions.
- 8) Information about a transaction resulting in the acquisition or disposal of property amounting to ten percent or more of assets of the Bank must include details about the parties to the transaction, the acquired or disposed assets, the terms and

conditions of the transaction, as well as, if available, other relevant details about the transaction;

a) a court decision on the forced liquidation or reorganization of the Bank, as well as the forced liquidation or reorganization of subsidiaries and affiliates of the Bank;

b) pledging (re-pledging) of property of the Bank for the amount of ten percent or more of the total book value of assets of the Bank, as well as the release from pledge (re-pledge) of property of the Bank amounting to ten percent or more of the total book value of assets of the Bank;

c) seizure (or release from seizure) of property of the Bank, the value of which amounts to ten percent or more of the total book value of assets of the Bank;

d) obtaining a loan by the Bank in an amount constituting twenty-five percent or more of the total book value of assets of the Bank, as well as the full repayment of the principal and payment of accrued interest on the loan;

e) occurrence of extraordinary circumstances that resulted in the destruction of property of the Bank, the book value of which amounted to ten percent or more of the total value of assets of the Bank;

f) initiation of a corporate dispute case in court;

g) obtaining (termination, suspension) of first-category permits;

h) changes in non-governmental securities of the Bank related to core activities;

i) other events affecting the interests of shareholders and/or investors of the Bank, in accordance with the charter and the prospects for the issuance of equity securities of the Bank.

24. Information is considered insider information from the moment it arises until it is disclosed to an unlimited number of parties in accordance with the legislation of the Republic of Kazakhstan and these Rules.

25. The Bank and parties recognized as insiders of the Bank shall ensure confidentiality of the insider information of the Bank until it is officially disclosed (published).

26. If the Bank believes that the required level of confidentiality of information recognized as insider information cannot be maintained or that a breach of confidentiality may occur, the Bank shall immediately take measures to disclose the information in the manner and within the time frames stipulated by the legislation of the Republic of Kazakhstan and these Rules.

27. The parties recognized as insiders of the Bank must comply with the procedure and conditions of disclosure of insider information of the Bank and the securities (derivatives) issued by it, including those defined by the Rules.

28. The following is not recognized as insider information of the Bank:

1) information prepared on the basis of public data, including research, forecasts and evaluations regarding the value of a security (derivative), property position of the Bank, conducted for the purpose of making investment decisions and/or preparing recommendations or proposals for conducting transactions with securities (derivatives);

2) information obtained from the mass media;

3) unconfirmed information from an unknown source, disseminated among a wide audience, as well as assumptions regarding current or planned activities of the Bank.

4) Insider information of parties in relation to which the Bank is recognized as an insider is determined in accordance with the legislation of the Republic of Kazakhstan.

Section 5. Procedure and time frames of insider information disclosure

29. The Bank shall disclose insider information in the manner and within the time frames established by the legislation of the Republic of Kazakhstan, trading rules, and internal documents of the Bank.

30. The disclosure of insider information of the Bank is carried out by the Bank through its publication in both the state and Russian languages.

31. The Bank publishes insider information about corporate events of the Bank on the websites of the Depository of Financial Statements (DFS) and KASE in the manner and within the time frames established by the legislation of the Republic of Kazakhstan and KASE's internal regulations.

32. The Bank publishes insider information about changes in activities of the Bank that affect the interests of its securities holders on the websites of the DFS and KASE, in the manner and within the time frames established by the legislation of the Republic of Kazakhstan and KASE's internal documents, as well as, in cases specified by the legislation of the Republic of Kazakhstan and/or when necessary, on the kmf.kz website of the Bank.

33. When securities (derivatives) of the Bank are included in the list of a stock exchange operating in the Republic of Kazakhstan, the Bank and individuals recognized as insiders of the Bank must ensure the disclosure of insider information about the Bank and the issued (provided) securities (derivatives) the disclosure of which will affect their value and operations of the Bank, before trading of these securities (derivatives) begins, in accordance with the procedures and conditions established by KASE.

34. When securities (derivatives) of the Bank are traded on the KASE trading system operating in the Republic of Kazakhstan, communications that imply the disclosure of insider information to a wide audience are sent to KASE, operating

in the Republic of Kazakhstan, and then published (distributed) in the manner and within the time frames specified by the Rules.

35. When securities (derivatives) of the Bank are simultaneously traded on the KASE trading system operating in the Republic of Kazakhstan and on stock exchanges in foreign countries, communications that imply the disclosure of insider information to a wide audience are sent simultaneously to all stock exchanges where securities of the Bank are listed, and then published (distributed) in the manner and within the time frames specified by the Rules.

Section 6. Control of the use of insider information of the Bank

36. Insiders of the Bank may not (are prohibited from):

1) use insider information of the Bank when conducting transactions with securities and other financial instruments;

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

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

37. The insiders of the Bank shall take the necessary measures to limit access to the insider information of the Bank by third parties and their employees who do not need this information to perform their official duties.

38. Insiders must not discuss insider information of the Bank in the presence of individuals who do not have access to insider information.

39. In the event of a threat or fact of unauthorized disclosure of insider information, or the loss of documents (information carriers) containing insider information of the Bank, an insider who is not an employee of the Bank must immediately notify the Bank, while an insider who is an employee of the Bank must notify the Chief Compliance Officer/Head of the compliance control subdivision.

40. The treasury subdivision conducts weekly monitoring and analysis of the prices of the securities (derivatives) of the Bank on KASE. If there are suspicions of transactions involving insider information of the Bank or with the aim of manipulation on the securities market (in accordance with the requirements of the regulatory act of the authorized body) or unauthorized leakage of information, within 3 (three) business days of detecting such a fact, the treasury subdivision must send information containing the report in the form of a memo via the electronic document management system to the Chief Compliance Officer/head of the compliance control subdivision. The information should include the reasons for the treasury subdivision's suspicions.

41. An employee of the Bank, upon discovering the cases of insider information disclosure by other employees of the Bank, must within 3 (three)

business days of such discovery send information thereon in the form of a memo via the electronic document management system to the Chief Compliance Officer/head of the compliance control subdivision. The information should include the reasons for the suspicions.

42. The Chief Compliance Officer/head of the compliance control subdivision, upon receiving information from the treasury subdivision or other subdivisions/employees of the Bank (including through anonymous channels) about possible violations of the Rules by insiders, or actions related to the use of insider information or manipulation on the securities market, may decide to initiate an internal investigation to identify the guilty individuals or the source of the information leakage.

43. If the violation is confirmed based on the results of an internal investigation, the Chief Compliance Officer/head of the compliance control subdivision may request the Chairperson of the Management Board/designated substitute to take the following measures against the insider who violated the requirements of the Rules, including, but not limited to:

- 1) issue a demand to the insider to avoid further violations of the Rules;
- 2) send information about the transaction involving securities (derivatives) of the Bank to the regulatory authority with the aim of having the transaction recognized as one conducted for the purpose of manipulation on the securities market;
- 3) initiate disciplinary measures in cases where they can be applied in accordance with the labor legislation of the Republic of Kazakhstan;
- 4) initiate a claim to the insider for compensation for material damage/losses caused to the Bank as a result of insider actions, including damage to business reputation;
- 5) initiate forwarding the case materials to law enforcement authorities to initiate criminal proceedings (if there are signs of a crime);
- 6) take other measures.

44. Insider information of the Bank is considered confidential information of the Bank until the moment of its disclosure.

45. The Bank and parties recognized as insiders of the Bank shall ensure confidentiality of the insider information of the Bank until it is officially disclosed (published).

46. If the Bank believes that the required level of confidentiality for insider information cannot be maintained or that there may be a breach of confidentiality, the Bank must immediately take measures to disclose the information in the manner and within the time frames specified by the Rules.

47. Individuals recognized as insiders of the Bank must adhere to the procedures and conditions for disclosing insider information about KMF and its issued (provided) securities (derivatives), including those specified by the Rules.

48. The protection of insider information is governed by the Rules as well as internal documents of the Bank regulating the use of confidential information.

49. Heads of responsible subdivisions of the Bank not listed in Appendix 4 to the Rules shall determine the list of employees in their subdivision who have access to insider information and should be included in the list of insiders. The criterion for including an employee in the list mentioned in this paragraph is the necessity of having access to insider information due to the employee's official position and duties.

50. In the event of a threat or fact of unauthorized disclosure of insider information or the loss of documents (information carriers) containing insider information, an insider who is an employee of the Bank must within 1 (one) business day of occurrence of the threat/fact of unauthorized disclosure, notify his/her immediate supervisor, who must then promptly inform the compliance control subdivision via corporate email.

Section 7. Responsibility for unlawful use of insider information

51. Responsibility for improper compliance with the Rules rests with the employees and heads of structural subdivisions of the Bank who have access to insider information.

52. Individuals who violate the requirements of the Rules shall bear responsibility in accordance with the legislation of the Republic of Kazakhstan.

53. In the case of unlawful use and dissemination of insider information, individuals who have committed such violations shall be brought to administrative, disciplinary, and other types of responsibilities as provided by the legislation of the Republic of Kazakhstan.

54. The head of the compliance control subdivision shall be responsible for organizing and maintaining effective internal control in terms of compliance with the requirements of the Rules in accordance with the provisions of internal regulations of the Bank.

55. Heads and employees of subdivisions of the Bank involved in the process of internal control over the handling and use of insider information are responsible for organizing and implementing internal control in accordance with the provisions of internal documents of the Bank that regulate internal control policy of the Bank and procedures of implementing internal control of the Bank.

56. Managers and employees of subdivisions of the Bank who are insiders are responsible for the timely signing of notifications.

57. The compliance control subdivision shall be responsible for informing insiders about the requirements of the legislation of the Republic of Kazakhstan regarding the handling and use of insider information, including the legal consequences of possessing insider information and the responsibility for violations of the legislation on the use and handling of insider information and the Rules.

58. Heads and employees of responsible subdivisions are personally responsible for providing signed notifications to the compliance control subdivision.

59. Heads of responsible subdivisions are responsible for the completeness and accuracy of the information provided to the compliance control subdivision, adherence to submission deadlines and keeping the information up-to-date (including the relevance of insider details).

60. Heads and employees of KMF subdivisions involved in the process of internal control over the handling and use of insider information must strictly adhere to the principle of avoiding conflicts of interest in the fulfillment of their duties and are responsible for complying with internal regulations of the Bank that govern the conflict of interest management policy of the Bank. In the event of a conflict of interest, heads and employees involved in the process of internal control over the disposal and use of insider information must notify their immediate supervisor and the compliance control subdivision.

Section 8. Final provisions

61. These Rules shall become effective on the date of their approval by the Board of Directors of the Bank.

62. These Rules shall be binding for all structural subdivisions of the Bank participating in the described process.

63. The Bank employees participating in the above described process shall be responsible for compliance with the requirements of these Rules in accordance with the internal regulations of the Bank.

64. Responsibility for improper fulfillment and violation of the requirements of these Rules rests with the heads of structural subdivisions involved in the process regulated by these Rules.

65. These Rules may be revised taking into account changes in the activities of the Bank, changes in the legislation of the Republic of Kazakhstan.

66. Amendments to these Rules can be approved only by the decision of the Board of Directors.

Appendix 1
to the Rules for internal control over the disposal
and use of insider information
of KMF Bank JSC

LIST OF PARTIES
with access to insider information
as of _____, 20__

Updated on _____, 20__.

Individuals

N o.	Full name	Date of birth	Position	Rationale for inclusion in the list	Date of occurrence of the rationale	Date of exclusion from the list	Nature of access to insider information (permanent/ temporary)	Comments
1	2	3	4	5	6	7	8	9

Legal entities

N o.	Name of a legal entity	Date and number of (re-) registrati on	Address of the legal entity (location)	Rationale for inclusion in the list	Date of occurrence of the rationale	Date of exclusio n from the list	Nature of access to insider information (permanent/ temporary)	Comments
1	2	3	4	5	6	7	8	9

Person responsible for maintaining and updating the insider list _____

Appendix 2

to the Rules for internal control over the disposal
and use of insider information
of KMF Bank JSC

NOTICE
to a legal entity of the acquisition of status of insider
of KMF Bank JSC

Hereby KMF Bank JSC (the “Bank”) kindly notifies _____ (please specify the name of a legal entity) (the “Company”) of the acquisition of Bank insider status effective _____, 20____, due to the fact that the Organization (please select one of the following grounds):

✓ has the right to own, use, and/or dispose of, directly or indirectly, ten percent or more of the voting shares (equity interests in the authorized capital) of the Bank;

✓ is an exchange on whose list financial derivatives issued by the Bank are included;

✓ is another person providing services to the Bank in accordance with an agreement (including an oral agreement), the terms of which provide for the disclosure of the Bank's insider information;

✓ other circumstances where the Company gains access to the Bank’s insider information.

Accordingly, the Organization is required to comply with the requirements of the legislation of the Republic of Kazakhstan regarding the use/disclosure of the Bank’s insider information—including the Law of the Republic of Kazakhstan "On the Securities Market" and the Rules on Internal Control over the Handling and Use of Insider Information (available on the Bank’s official website at www.kmf.kz)—including, among other things:

✓ not to use Bank’s insider information when making transactions with securities (derivatives) issued by Bank;

✓ not to transmit or make available Bank’s insider information to third parties, except in cases provided by the laws of the Republic of Kazakhstan;

✓ not to provide third parties with recommendations regarding transactions with securities based on Bank’s insider information;

✓ to maintain a list of its employees who, due to their official position and duties, have access to Bank’s insider information;

✓ to inform its employees about the requirements of the legislation of the Republic of Kazakhstan regarding the prohibition on the use of Bank’s

insider information and the Rules of Internal Control over the Disposal and Use of Insider Information in KMF Bank JSC;

✓ to inform the Bank about public associations and self-regulatory organizations of which it is a member (in cases where KMF insider information is disclosed to such organizations), in the manner and within the deadlines established by Rules of Internal Control over the Disposal and Use of Insider Information in KMF Bank JSC;

✓ to guarantee that the personal data provided to the Bank regarding employees, who by virtue of their official position and job duties have access to KMF insider information, is collected and transmitted in accordance with the requirements of the Law of the Republic of Kazakhstan “On Personal Data and its Protection”;

✓ to inform public associations and self-regulatory organizations, of which it is a member, about the need to comply with the requirements of the legislation of the Republic of Kazakhstan, including the Law of the Republic of Kazakhstan “On Securities Market”, in terms of the prohibition on the use of KMF insider information, as well as the Rules of Internal Control over the Disposal and Use of Insider Information in KMF Bank JSC (in case the Bank insider information is disclosed to such organizations);

✓ to inform the Bank about its employees who, due to their official position and job duties, have access to KMF insider information, by providing the Bank with the following information:

Full name (patronymic, if available) of an individual	Date of birth	Rationale for inclusion in the list of insiders	Date of occurrence of the rationale for inclusion in the list of insiders	Date of exclusion from the list of insiders

The Company is liable in accordance with the legislation of the Republic of Kazakhstan for any violation of the requirements of the legislation of the Republic of Kazakhstan and/or the Rules on Internal Control over the Handling and Use of Inside Information at KMF Bank JSC.

I have familiarized myself with the requirements of the Law of the Republic of Kazakhstan "On the Securities Market" regarding the use/disclosure of the

Bank's inside information and the Rules on Internal Control over the Handling and Use of Inside Information at KMF Bank JSC and I have been notified of the associated liability.

_____ *(position, full name of the authorized person of the Company*
(name of the Company), signature

Appendix 3
to the Rules for internal control over the disposal
and use of insider information
of KMF Bank JSC

NOTICE
to an individual of the acquisition of status of insider
of KMF Bank JSC

KMF Bank JSC (the "Bank") hereby notifies _____ (please specify full name) that, effective "___" _____ 20__, you are designated as an insider of the Bank in accordance with Clause 3 of Article 56-1 of the Law of the Republic of Kazakhstan "On the Securities Market". Accordingly, you are required to comply with the legislation of the Republic of Kazakhstan regarding the use and disclosure of the Bank's insider information—including the Law of the Republic of Kazakhstan "On the Securities Market"—as well as the Rules on Internal Control over the Handling and Use of Insider Information at KMF Bank JSC (available on the Bank's official website at www.kmf.kz), including:

- ✓ not use the Bank's insider information when making transactions with securities (derivative financial instruments) issued by the Bank;
- ✓ not directly or indirectly engage in transactions involving insider trading;
- ✓ not disclose or make accessible to third parties the Bank's insider information;
- ✓ not provide third parties with recommendations on securities transactions based on the Bank's insider information.

For any violations of the requirements of the legislation of the Republic of Kazakhstan and/or the Rules of internal control over the disposal and use of insider information in KMF Bank JSC, you will be held accountable in accordance with the legislation of the Republic of Kazakhstan.

By signing this letter, you confirm your acceptance of the abovementioned restrictions established by the legislation of the Republic of Kazakhstan regarding insiders, as well as your commitment to not disclose insider information and your awareness of the sanctions for improper use and dissemination of insider information.

I have read and understood the requirements of the Law of the Republic of Kazakhstan “On the Securities Market” regarding the use/disclosure of the Bank’s insider information and the Rules of internal control over the disposal and use of insider information of the Bank and have been notified of the liability.

.....
(Full name, signature)

.....
(Date)

Please sign and return the signed copy of this notification to the Bank no later than five business days from the date of receipt of this notification.

**The list of subdivisions of the KMF Bank JSC
subject to inclusion in the insider list**

1. The list of insiders of KMF Bank JSC (the “Bank”) includes managers and key personnel of the following Bank units who, by virtue of their official position and employment duties, have access to the Bank’s insider information:

- 1) Corporate Secretary subdivision;
- 2) Internal Audit subdivision;
- 3) Compliance Control subdivision;
- 4) Legal subdivision;
- 5) Treasury subdivision;
- 6) Security subdivision;
- 7) Accounting and Reporting subdivision;
- 8) Financial Planning and Reporting subdivision;
- 9) Financial Risk Management Unit subdivision;
- 10) Strategic Development and ESG subdivision;
- 11) Transformation Projects subdivision;
- 12) Credit and Operational Risks subdivision;
- 13) HR subdivision.

2. The HR subdivision sends the approved organizational structure of the Bank and/or changes to it to the compliance control department via a memo in the electronic document management system no later than 3 (three) business days from the date of signing the protocol on the adoption of the relevant decision by the authorized body of the Bank.