


For internal use
Annex No.4
to the circular Resolution of the
Management Board of Otbasy Bank JSC
(Minute No.47) dated 16.03.2023

Annex No.4
to the circular Resolution of the
Management Board of Otbasy Bank JSC
(Minutes No.160) dated 29.09.2021

Annex No. 29
to the Resolution of the Management Board of
Zhilstroyberbank of Kazakhstan JSC
(Minutes No.51) dated 28.12.2017

	Superior Internal Document	Charter of Otbasy Bank JSC
	Internal Document Owner	Press service
	Developed by	Director of the Department of Advertising and Public Relations Z.S.Masgutov, Head of the Office of Public Relations of the Department of Advertising and Public Relations N.V.Kutlina
	Approved	Resolution of the Management Board of Zhilstroyberbank of Kazakhstan JSC (Minutes No.51) dated 28.12.2017
	Effective date	28.12.2017
	Restrictive stamp	For internal use

**Rules
for disclosure of information of Otbasy Bank JSC**

Almaty, 2017

Revision	Data of the resolution of the Bank's body on approval of amendments/additions	Procedure for introduction of approved amendments/additions
1	RMB No.51 dated 28.12.2017	
2	RMB No.10 dated 29.01.2020	
3	RMB No.160 dated 29.09.2021	
4	RMB No.47 dated 16.03.2023	

CONTENT

Chapter 1. General provisions.....	2
Chapter 2. Objectives and principles of information disclosure.....	4
Chapter 3. Form and methods of information disclosure.....	5
Chapter 4. Procedure for information disclosure.....	5
§1. Information subject to mandatory disclosure.....	5
§2. Additionally disclosed information (publicly available information).....	6
§3. Provision of information for Internet resource www.hcsbk.kz, real estate portal Baspana Market "www.otbasybank.kz", in Internet banking system (https://online.hcsbk.kz), including via mobile application "Otbasy bank".....	7
§4. Publication of information on printing materials.....	8
§ 5. Publication of information in mass media.....	8
§ 6. Coordination of work with mass media.....	9
§7. Order of interaction with mass media.....	9
§8. Commenting on rumors.....	9
§9. Confidential information.....	10
Chapter 5. Final provisions.....	10

Chapter 1. General provisions

1. Rules for disclosure of information of Otbasy bank JSC (hereinafter referred to as the Rules) have been developed in accordance with the legislation of the Republic of Kazakhstan, Charter of Otbasy bank JSC (hereinafter referred to as the Bank), and internal documents of the Bank. (*paragraph 1 was amended according to the resolution of the Management Board of the Bank (Minutes No.160) dated 29.09.2021*)

2. These Rules are aimed at improvement of transparency of activities of the Bank and formation of a positive image of the Bank in view of its shareholders, customers, general public, workers, employees and consultants of the Bank. The Rules define the list of publicly available documents and information, as well as the procedure and methods of their provision.

3. The disclosed information of the Bank is divided into three types:

- 1) information subject to mandatory disclosure;
- 2) additionally disclosed information;
- 3) confidential information.

4. The responsible body for disclosure of information on activities of the Bank is the Management Board of the Bank.

5. The Rules are mandatory for all workers, employees and consultants of the Bank.

6. Terms and definitions:

- 1) Newsworthy occurrence - an event which may raise interest among general public. Under certain conditions, a newsworthy occurrence allows to create an information message (news);
- 2) Image information - information containing reputational data;
- 3) Interview - a kind of conversation between two or more people, in which the interviewer asks questions to the interlocutors and receives answers from them. The interview can be recorded on special devices (voice recorder, video camera) or take place live. When providing information in interviews, workers and employees of the bank shall be guided by the following principles:
 - priority of depositors' interests;
 - achievement of maximum effectiveness in solving problematic issues of depositors;
 - high interest of the bank in solving problems, issues.
- 4) Consultant - an individual who provides services to the Bank on the basis of an Engagement Agreement concluded between the Bank and the Consultant by submitting an application to join the Standard Terms of the Engagement Agreement;
- 5) The responsible department is the Press Service; *(subparagraph 5 of paragraph 6 was amended according to the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*
- 6) Printing materials - brochures, booklets, posters, leaflets, catalogs, brochures, and other printed materials that are clearly of an advertising nature;
- 7) Press secretary - an employee of a responsible department who interacts with mass media on a daily basis;
- 8) The list of information of limited distribution - a list of protected information, including information constituting an official, commercial or other legally protected secret of the Bank, approved by the Board of Directors; *(subparagraph 5 of paragraph 6 was amended according to the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*
- 9) Worker - an individual in employment relationship with the Bank, who directly performs work under an employment contract;
- 10) Respondent – a worker or employee of the Bank, the head of the Bank or branch, who is supposed to be interviewed or has already been interviewed;
- 11) Mass media - mass media (television, print media, radio, Internet publications);
- 12) Employee – an individual who is in civil relations with the Bank and directly provides services under a contract for the provision of paid services / engagement agreement;
- 13) Exclusive information – information that has not been previously announced or published;
- 14) Internet resource - an electronic information resource, the technology of its management and (or) use, functioning in an open information and communication network, as well as an organizational structure that provides information interaction;
- 15) Customer – a natural or legal person who is a consumer of banking services or intends to use banking services.
- 16) Bank secrecy – information about the Bank's customers and correspondents, their transactions and relationships with the Bank related to receiving banking services, including without limitation: information about the availability, owners and numbers of bank accounts and correspondents of the Bank, the balance and movement of money in these accounts and the accounts of the Bank itself, restrictions on the listed accounts (decisions and (or) orders of state bodies on the suspension of expenditure transactions, arrests, pledges), transactions of customers and correspondents and the Bank (except for the general conditions of banking operations), as well as the availability, owners, nature and value of the property of customers stored in safe boxes, cabinets and premises of the Bank, information about the receipt of loans by customers (except for the cases defined in this article), transactions on payments and (or) money transfers, including operations performed without opening a bank account.

17) Commercial secret – information that has actual or potential commercial value for the Bank due to no access of third parties to such information, no free access to the information on a legal basis, and the Bank takes measures to protect its confidentiality.

18) Confidential information – information, disclosure of which is limited by the legislation of the Republic of Kazakhstan and (or) internal documents of the Bank.

19) Insider information - reliable information about securities (derivative financial instruments), transactions with them, as well as the Bank that issued (provided) securities (derivative financial instruments), its activities that constitute a trade secret, as well as other information not known to third parties, the disclosure of which may affect changes in the value of securities (derivative financial instruments) of the Bank and the Bank's activities;

20) Personal data - information related to an identified or to be identified individual on the basis of such data, recorded on electronic, paper and (or) other material media.

21) Initiator – workers /employees, divisions of the Bank, officials of the Bank, initiating publication of information about processes, new services and products, operating mode on the Internet resource "www.hcsbk.kz ", Baspana Market real estate portal "www.otbasybank.kz", in the Internet banking system (<https://online.hcsbk.kz>), including via the mobile application "Otbasy bank", as well as in the official media of the Bank;

22) Information Asset Business Owner – a division (worker) of the Bank that is the owner of the main business process that automates the information system or subsystem;

23) Business Process Owner – a division (worker) of the Bank responsible for the design (technology) of the main part of the process to achieve the goals of the business process, which is the owner of risks in the fixed business process that hinder the achievement of the goals of the business process;

24) Product Business Owner - a division (worker) of the Bank responsible for the implementation of the product, which has a direct interest in the quality performance of the product;

25) EDMS - electronic document management system;

(Paragraph 6 of the Rules are supplemented by sub-paragraphs 21) - 25) according to the resolution of the Bank's Management Board (Minutes No. 47) dated 16.03.2023)

Chapter 2. Objectives and principles of information disclosure

7. The purposes of these Rules:

- 1) definition of general principles of information disclosure;
- 2) ensuring information transparency of the Bank;
- 3) ensuring control over the information disclosure process;
- 4) improving the business reputation of the Bank in the society;
- 5) formation of a positive public opinion about the Bank;
- 6) informing potential customers about the Bank's products and news;
- 7) strengthening the corporate culture of the Bank.

8. The Rules are based on the following principles:

- 1) Regularity and efficiency of providing information;
- 2) Objectivity, completeness, reliability and consistency of the information provided;
- 3) Equality of the rights of all interested persons to receive information, taking into account the standards established by the current legislation;
- 4) Maintaining a reasonable balance between transparency of the Bank and compliance with its commercial interests;
- 5) Compliance with the confidentiality regime with respect to information constituting banking, commercial and other legally protected secrets, insider information and personal data, and control over the use of internal information.

9. The terms of information disclosure shall be regulated by the legislation of the Republic of Kazakhstan and internal documents of the Bank.

Chapter 3. Form and methods of information disclosure

10. The Bank uses the following forms in information disclosure:

1) a written document, including responses to inquiries, publications (messages) in mass media, brochures, reports on the Bank's activities, materials for workers, employees and consultants of the Bank;

2) oral communication, including interviews, press conferences, speeches at meetings and public events inside and outside the Bank;

3) audio-visual recording, including video clips, corporate videos, speeches or interviews in radio and television programs, slides and other means of visual presentation used at meetings, public events (conferences) inside and outside the Bank;

4) materials transmitted on electronic media, including e-mail, disks, USB devices and other media;

11. Disclosure of information is carried out by the Bank by distributing information in the following ways:

1) providing access to information (documents) in accordance with the procedure provided for by the legislation, the Bank's Charter, these Rules and other internal documents of the Bank;

2) publication in mass media;

3) publication on the Internet on the Bank's Internet resource at: www.hcsbk.kz, Baspana Market real estate portal "www.otbasybank.kz", in the Internet banking system (<https://online.hcsbk.kz>), including through the mobile application "Otbasy bank", as well as in the official social media of the Bank; *(subparagraph 3) of paragraph 11 of the Rules was amended according to the resolution of the Bank's Management Board (Minutes No. 47) dated 16.03.2023)*

4) holding press conferences and meetings with mass media;

5) by other means provided for by the legislation of the Republic of Kazakhstan and internal documents of the Bank.

Chapter 4. Procedure for information disclosure

§1. Information subject to mandatory disclosure

12. The Bank carries out mandatory disclosure of information in accordance with:

1) regulatory legal acts of the Republic of Kazakhstan;

2) requirements of International Financial Reporting Standards;

3) internal documents of the Bank;

4) if information on the Bank's activities is mandatory for disclosure, the Bank shall publish such information by sending a corresponding press release to mass media, posting on an Internet resource "www.hcsbk.kz" and/or Baspana Market real estate portal "www.otbasybank.kz", and/or in the Internet banking system (<https://online.hcsbk.kz>), including via the mobile application "Otbasy bank", as well as in the official social media of the Bank. *(subparagraph 4) of paragraph 12 of the Rules was amended according to the resolution of the Bank's Management Board (Minutes No.47) dated 16.03.2023).*

13. When the client applies to the Bank in order to receive banking services, the Bank, at the first request of the client, provides him/her with the general terms of operations, containing information and procedures provided for by the legislation on banking activities.

14. The Bank shall publish the balance sheet, income and expense report in open access quarterly and at the end of the year within the terms established by the National Bank of the Republic of Kazakhstan, as well as shall publish information on procurement of goods, works and services.

15. Annual financial statements with the conclusion of external auditors shall be provided to the relevant state bodies and published in terms and volumes determined by regulatory legal acts of the Republic of Kazakhstan and internal documents of the Bank.

16. In case of mandatory disclosure of information, the list of persons authorized to disclose information on behalf of the Bank includes:

- 1) Chairman of the Bank's Management Board;
- 2) Members of the Bank's Management Board and Managing Directors;
- 3) Chief Accountant of the Bank.

17. Provision of reporting information to the state supervisory and statistical bodies of the Republic of Kazakhstan is carried out by the consolidated reporting unit.

§2. Additionally disclosed information (publicly available information)

18. Additional information to be disclosed includes:

- 1) the main activities of the Bank;
- 2) annual report of the Bank;
- 3) information on significant events in activities of the Bank;
- 4) information on the structure of the Board of Directors and the Management Board of the Bank;
- 5) information on existing vacancies, HR policy of the Bank;
- 6) list and addresses of Bank branches;
- 7) information on affiliated persons;
- 8) information on the Bank's shareholders and partners;
- 9) information on strategic development of the Bank;
- 10) accounting policy of the Bank;
- 11) press releases and promotional and informational articles of the Bank;
- 12) presentation stories and commercials of the Bank.
- 13) news and announcements concerning the Bank's activities. *(Paragraph 18 of the Rules is supplemented by subparagraph 13) according to the resolution of the Bank's Management Board (Minutes No. 47) dated 16.03.2023)*

19. Information specified in paragraph 18 is disclosed in the media and is publicly available on the Bank's Internet resource, with the exception of subparagraph 12) of paragraph 18 of these Rules.

20. If it is necessary to disclose additional and voluntary information, the list of authorized persons to disclose such information on behalf of the Bank includes:

- 1) Chairman of the Bank's Management Board;
- 2) Members of the Bank's Management Board and Managing Directors;
- 3) workers of the responsible department;
- 4) heads of independent divisions of the central office of the Bank within the limits of the powers granted;

21. The directors of the Bank's branches, as well as their deputies, have the right to speak publicly and provide comments only on the activities of the Bank's branch within the powers defined by the job descriptions and the Regulations on the branch.

22. Heads of independent divisions and directors of branches of the Bank have no right to disclose previously unpublished information.

§3. Provision of information for Internet resource www.hcsbk.kz, real estate portal Baspana Market "www.otbasybank.kz", in Internet banking system (<https://online.hcsbk.kz>), including via mobile application "Otbasy bank".

(in the Content, the titles of §3 of Chapter 4 of the Rules are amended according to the resolution of the Bank's Management Board (Minutes No.47) dated 16.03.2023)

23. The responsible department and the Information technology department shall bear responsibility for posting and updating information on the Bank's Internet resource.

24. The responsible divisions for the reliable, timely and up-to-date content of information posted on the Bank's Internet resource in Kazakh, Russian and English languages are the divisions of the Bank specified in the relevant administrative document for the Bank regulating the procedure for the formation and posting of information on the Bank's external Internet resource.

24-1. The information specified in subparagraph 13) of paragraph 18 of these Rules shall be sent by the Initiator within 2 (two) business days to the head of the information asset business owner with the mandatory approval of the process/issue covered in the publication by the business process owner and/or the product business owner, for accuracy.

The business process owner and/or the product business owner shall check the information for accuracy within 2 (two) business days from the date of receipt of the information from the Initiator. If there are comments to the specified information, such information shall be returned to the Initiator to eliminate the comments.

The Initiator shall eliminate such comments and re-send the information for approval within 1 (one) business day from the date of receipt of comments from the business process owner and/or the product business owner.

24-2. The information asset business owner shall check the process/question covered in the publication for the approval by the structural divisions - the business process owner and/or the product business owner. If it is approved, the information asset business owner shall post the information within 3 (three) business days from the date of receipt of the information, unless other term is specified in EDMS or in the order. In the absence of approval of the process/issue covered in the publication by the structural divisions – the business process owner and/or the product business owner, the information asset business owner shall return it to the Initiator for revision within 2 (two) business days from the date of receipt of information in the EDMS.

The Initiator shall eliminate the comments and re-send the information, taking into account requirements of paragraph 24-1 of these Rules, within 2 (two) business days from the date of receipt of information from information asset business owner.

(§3 of Chapter 4 of the Rules are added with paragraphs 24-1 and 24-2 according to the resolution of the Bank's Management Board (Minutes No.47) dated 16.03.2023)

§4. Publication of information on printing materials

25. The Bank shall publish information on the main activities of the Bank, advertising materials and other information on printing materials, as required.

26. The information prepared for publication on printing materials shall be coordinated with the Banking Products and Technologies Division, the Sales and Regional Development Division, the Consolidated Reporting Division, as well as with the supervising head of the responsible division. Other divisions shall be involved as necessary if the issue concerns their activities. *(paragraph 26 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

27. In case of publication in the state language, the information shall be coordinated with the administrative division.

§5. Publication of information in mass media

28. The Bank shall post and publish press releases, articles, interviews and other information in the media distributed in the territory and outside the Republic of Kazakhstan, as necessary.

29. In accordance with the principles of information disclosure, the Bank shall conduct an active dialogue with media representatives through a number of activities, including:

- 1) distribution of press releases on all significant events in the activities of the Bank;
- 2) holding press conferences and meetings of media representatives with the Bank's management;
- 3) prompt and competent responses to all information requests from media representatives received by the Bank;
- 4) participation in conferences, seminars and other public events;

30. Publications of an advertising and informational nature (interviews, reports, articles) prepared for distribution to the media by the responsible department should be submitted for approval to the banking products and technologies division, the sales and regional development division, the consolidated reporting division, as well as to the head in charge of the responsible department. Other divisions shall be involved as necessary if the issue concerns their activities. *(paragraph 30 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

31. Publications of an advertising and informational nature (interviews, reports, articles, and advertising layouts) prepared by the Bank's branches for publication in regional media shall be submitted by the employees of the branches to the responsible department for approval.

32. Image exclusive information is subject to mandatory submission for approval to the banking products and technologies division, the sales and regional development division, the head in charge of the responsible division. *(paragraph 32 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

33. Information for the statements of the directors of the Bank's branches at press conferences and in other public statements shall be submitted by the branch to the responsible department, then, if necessary, they are coordinated with the involved departments of the central office of the Bank.

§6. Coordination of work with mass media

34. Coordination of work with mass media is the exclusive competence of the responsible department.

35. Coordination of work with mass media means as follows:

- 1) general plan of interaction with the media;
- 2) collection, systematization, preparation and provision of information for the media;
- 3) assignment of the respondent.

36. All workers and employees of the central office and branches of the Bank and consultants are obliged to assist the responsible department in obtaining the necessary information within their authority as soon as possible and follow the recommendations of the department for interaction with mass media.

§7. Order of interaction with mass media

37. All information exchange, except for announcements on auctions, vacancies, procurement of goods, works and services, and others that have no reputational significance, not image-based, not forming public opinion, with mass media shall be carried out through the head of the responsible department and the press secretary, who are responsible for processing, distributing and coordinating inquiries.

38. The press secretary shall form the news base by means of a report provided to him/her on a weekly basis, every Monday from the divisions of the Central Office and branches of the Bank. Next, the press secretary shall determine the priority of the news by significance and determine the newsworthy occurrence. Depending on the status of the newsworthy occurrence, the press secretary shall prepare a brief message and send it to the media or make a proposal to hold a press conference. If the news is of an internal nature, it shall be posted on the Bank's internal website.

39. If an inquiry is received from mass media, the press secretary shall form a response, having agreed with the head of the responsible department on the subject of the inquiry. The relevant divisions of the Bank may be involved for preparation of the response.

40. Unauthorized contacts with mass media on the subject of the Bank's activities are prohibited to all workers, employees and consultants of the Bank, with the exception of the Bank's management specified in paragraph 20 of the Rules.

41. Workers, employees and consultants of the Bank who contact mass media shall comply with the Code of Business Ethics approved by the Board of Directors of Zhilstroysberbank of Kazakhstan JSC.

§8. Commenting on rumors

42. In response to inquiries concerning rumors and other unconfirmed information, authorized representatives of the Bank can only report the following: "The Bank's disclosure rules do not allow commenting on rumors and assumptions." If an official request is received from representatives of state bodies concerning rumors and assumptions about the Bank's activities, this request shall be sent to the involved divisions of the Bank for elaboration and preparation of an official response.

43. The responsible division shall conduct constant monitoring of mass media throughout the territory of the Republic of Kazakhstan and, if negative information, publications, official statements appear in relation to the Bank, immediately inform the supervising member of the Management Board/Managing Director, legal department, risk management department and compliance control department. The responsible department is responsible for timely identification of reputational risk in mass media.

44. In cases of unforeseen situations, the responsible person for comments on inquiries of mass media representatives is the responsible department (director, press secretary) for approval of the provided information with the Chairman of the Management Board of the Bank. *(paragraph 44 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

§9. Confidential information.

45. The Bank shall take measures to protect confidential information in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Bank.

46. The Management Board of the Bank shall ensure compliance with the confidentiality regime in order to protect confidential information, including banking, commercial and other legally protected secrets, insider information and personal data, prevent possible damage from disclosure or unauthorized leakage of this information, exclude the facts of illegal use of this information by any stakeholders.

47. Confidential information is included in the List of protected information, including information constituting an official, commercial or other legally protected secret of the Bank, approved by the Board of Directors. *(paragraph 47 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

48. Information constituting bank secrecy may be disclosed only on the grounds and in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

49. The procedure for working with documents and information of limited distribution is established by internal documents of the Bank.

50. The preservation of confidential information and bank secrecy is the responsibility of all workers and employees of the Bank.

51. In case of violation of paragraph 53 of the Rules, which entailed material damage and reputational risks, the persons guilty of such violation shall be held liable in accordance with the legislation of the Republic of Kazakhstan.

52. Control over the prevention of the transfer of confidential information in the process of information disclosure shall be carried out by the security department.

Chapter 5. Final provisions

53. The list of disclosed information may change depending on the current legislation, norms and requirements of the authorized body of the Republic of Kazakhstan.

54. The Rules shall be approved by the Management Board of the Bank and be subject to annual review for changes, if necessary.

55. The assessment of the Bank's activities for compliance with these Rules shall be carried out by the Management Board of the Bank annually, in accordance with the procedure established by the Management Board of the Bank.

55-1. The Bank's transparency and the effectiveness of information disclosure processes shall be reviewed by the Bank's Board of Directors as part of the Bank's Annual Report.

55-2. The responsible department shall form a corresponding report on an annual basis, taking into account the disclosure of mandatory information and information subject to additional disclosure, and submit it to the planning and strategic analysis department for inclusion in the Bank's Annual Report.

55-3 The report on the effectiveness of information disclosure processes shall be prepared by the responsible department in any form and submitted no later than 5 business days from the date of sending the relevant request by the planning and strategic analysis department.

56. Control over compliance with these Rules is entrusted to the member of the Management Board in charge of the responsible department. *(paragraph 56 was amended in accordance with the resolution of the Bank's Management Board (Minutes No. 160) dated 29.09.2021)*

57. These Rules are mandatory for execution by all divisions of the central office, branches of the Bank.

58. Workers and employees of the Bank shall bear liability set by the legislation of the Republic of Kazakhstan for violation of the requirements of these Rules.