



Document of public nature

R u l e s
of internal control over access to and using insider information

Subject:	Regulates the relations arising at Joint Stock Company “Tengri Bank” (hereinafter – Bank) when using the information qualified as insider information	
Approved:	By the decision of Board of Directors	Resolution passed by circulation, dated June, 28 2019 № 15
Effective	June, 28 2019	
Next revision:	Upon the expiration of three years from the date of implementation or in other term as the case may be	

The present Regulations on internal control over access to and using insider information (hereinafter – Regulations) have been developed pursuant to the legal requirements of the Republic of Kazakhstan, the Securities Market Act of the Republic of Kazakhstan, the Companies Act, the Rules for disclosing insider information in the securities market approved by the Board Decree of the National Bank of the Republic of Kazakhstan dated February 24, 2012, No69, The Rules for disclosure by the issuer of information, the requirements for the content of information to be disclosed by the issuer, as well as the timing of the disclosure of information by the issuer on the Internet resource of the financial statements depository, approved by the Board Decree of the National Bank of the Republic of Kazakhstan dated August 2 , 2018 № 189, the Regulations on formation of risk management and internal control system for second-tier banks approved by the Board Decree of the National Bank of the Republic of Kazakhstan dated February 26, 2014 No29 (hereinafter – Regulations No29), the list of insider information of JSC Kazakhstan Stock Exchange, and internal normative documents of the Bank (hereinafter – internal documents).

Article 1. General Provisions

1. These Regulations apply the concepts and conventions provided for by the legislation of the Republic of Kazakhstan and internal documents, as well as the following notions and conventions:
 - 1) Insider information is the information on securities (derivative financial instrument), transactions with them, and information about the issuer (provider) of securities (derivative financial instrument), its activities, which is a commercial secret, as well as other information that is not known to third parties, the disclosure of which may affect the change in the value of securities (derivative financial instrument) and on the activities of their issuer (until the Bank officially discloses insider information). The Insider information of the Bank is determined by annex1 to the Regulations;
 - 2) insider is a person having access to the insider information;
 - 3) list of insiders of the Bank is the list of entities having access to insider information of the Bank;
 - 4) trading authority (ies) is (are) stock exchange(s) and quotation organization(s) of the over-the-counter securities market;
 - 5) responsible divisions are structural divisions of the Bank within their functions ensure the conclusion of contracts with Bank's insiders, being directly involved in organizing corporate events of the Bank, carrying out transactions with financial instruments for the benefit of clients, carrying out other actions during which employees of responsible divisions may receive information about the occurrence / termination of the Bank insiders;
 - 6) derivative financial instrument is a contract which cost depends on the price (including price fluctuation) of basic asset of the contract, having provision for the settlement under the contract in the future. Derivative financial instruments include options, futures, forwards, swaps, and other derivative financial instruments that meet these criteria, including those representing a combination of the above derivative financial instruments. Basic assets of derivative financial instruments are goods, standardized commodities, securities, currencies, indexes, interest rates and other assets of market value; future event or circumstance, or derivative financial instruments;
 - 7) EDMS is the Bank's system of electronic document management;
2. The Regulations aim at regulation of using insider information of the Bank and includes:
 - 1) definition of insider information of the Bank and an insider of the Bank;
 - 2) determination of the procedure of management and use of insider information of the Bank and the procedure and time lines of disclosure of the Bank's insider information, maintenance of the Bank's list of insiders; differentiation of rights of access to the Bank's insider information;
 - 3) development and implementation of control measures for use of insider and confidential information;

- 4) rules of protecting confidentiality of insider information of the Bank;
 - 5) responsibility for use of insider information.
3. To ensure compliance of the Bank's insiders with the legal requirements of the Republic of Kazakhstan with regard to the Bank's insider information and the present Regulations, the Regulations shall be posted on the official web-site of the Bank in national and Russian and may be submitted to the Bank's insiders if requested according to the procedure and term established by the internal documents.

Article 2. The Bank's insiders

1. the Bank's insiders shall be:
 - 1) Chairperson and members of the Bank Board of Directors;
 - 2) CEO and members of the Bank Management Board;
 - 3) advisor to Chairperson of the Bank Board of Directors, chief accountant of the Bank and executive directors of the Bank – non-members of the Management Board, chief financial officer, advisors and assistants for CEO of the Bank;
 - 4) managers of all subdivisions of the Bank, directors of the Bank branches, chief compliance controller and employees of the Management Board Office, the Compliance Control Service, internal audit and corporate secretary office, employees of the general administrative division;
 - 5) persons having access to the insider information of the Bank due to the possession, using, and (or) managing directly or indirectly 10 and more percent of voting shares of the Bank;
 - 6) audit firm, professional participants of the securities market and other entities rendering services to the Bank according to concluded contracts (including verbal), wherein the terms provide for the disclosure of insider information of the Bank;
 - 7) organizers of trades the lists of which includes securities (derivative financial instruments) issued (presented) by the Bank;
 - 8) members of the Board of Directors and listing commission of a stock exchange in the trading system of which the deals made with securities of issuer and other financial instruments;
 - 9) employees of the National Bank of the Republic of Kazakhstan and its establishments, government officials who have access to the insider information by virtue of their functions and powers;
 - 10) public associations and professional organizations whereof the Bank is a member, and the organizations specified in sub-clauses 5)–7) herein, having access to the insider information of the Bank by virtue of their powers;
 - 11) employees of organizations specified in sub-clauses 5)–7), and 10) herein, having access to the insider information of the Bank by virtue of their official position and employment duties;
 - 12) entities received insider information of the Bank from the above listed entities;
 - 13) other employees of the Bank, including the Bank branches having access to the insider information by virtue of their functional responsibilities.

Article 3. The Bank's Insider List maintenance procedure

1. The compliance control division maintains the list of insiders according to the form enclosed as annex 2 to the Regulations (in electronic form and in hard copy), being kept updated and updated on a monthly basis.
 - 1) as for sub-clauses 1), 2) and 5) clause 1 article 2 of the Regulations – based on the data provided by the corporate secretary office;
 - 2) as for sub-clauses 3) and 4) clause 1 article 2 of the Regulations – based on the data provided by the HR division;
 - 3) as for sub-clauses 6) and 7) clause 1 article 2 of the Regulations – based on the data provided by the heads of responsible divisions, initiated the conclusion of contracts with Bank insiders;
 - 4) as for clause 13) article 2 of the Regulations – based on the data provided by other responsible divisions.

2. The information shall be provided to the compliance control division by the responsible divisions specified in clause 1 herein, no later than five working days from the date of origination of grounds for including an insider in the Bank's list of insiders, Therefore, to update the insider list the compliance control division may address a relevant request of the Bank's divisions.
3. The Bank includes in the list of insiders of the Bank only the entities specified in sub-clauses 1)–7) clause 1 article 2 of the Regulations. The insider list of the Bank comprises personal data and shall be a confidential document.
4. Heads of responsible divisions shall:
 - 1) analyze the legality of qualifying a person as an insider of the Bank, based on the information and documents at the disposal of the responsible unit. The criterion for the inclusion of an employee in the list of insiders is the need to access insider information, due to the official position and work duties of the employee;
 - 2) if it is necessary to amend the Bank's insider list, provide the compliance control unit with information, according to Annex 2 to the Regulations, no later than the working day following the occurrence of the grounds for amendments.
5. Collections, processing and storage of personal data of the Bank's insiders – physical persons:
 - 1) specified in sub-clauses 2)–4) clause 1 article 2 hereof the employees of the Bank subject to the Personal Data Protection Act of the Republic of Kazakhstan;
 - 2) specified in sub-clauses 1) and 5) clause 1 article 2 hereof, subject to the legal requirements of the Republic of Kazakhstan on maintenance of the register of affiliates of the Bank.
6. The compliance control division based on the information received from responsible divisions shall notify the insiders of the Bank on the inclusion/exclusion thereof in/from the insider list of the Bank of the liability for violation of the requirements of the legislation of the Republic of Kazakhstan and these Regulations for the use and handling the insider information of the Bank in the form provided in Annexes 3 and 4 hereto.

The notice shall be sent no later than ten working days from the date of inclusion/exclusion in/from the insider list of the Bank at the address known to the Bank (registered mail) or, e-mail address of the entity included/excluded in/from the insider list of the Bank.

Bank insiders, being employees of the Bank, are notified in the form of annexes 3 and 4 and are sent via a message via the Bank's corporate e-mail /EDMS or personal e-mail.

7. The insiders are referred to in sub-clauses 5)–7) and 10) clause 1 article 2 hereof, shall:
 - 1) maintain a list of their employees who possess by virtue of their official position and employment duties access to insider information of issuers, with regard to which those legal entities recognized as insiders;
 - 2) inform its employees about the requirements of the legislation of the Republic of Kazakhstan regarding the prohibition on the use of insider information and internal control rules, with regard to which those legal entities recognized as insiders;
 - 3) inform the Bank about its employees who, by virtue of their official position and job duties, have access to the Bank's insider information, in the order and terms established by the internal control rules;
 - 4) ensure that the provided personal data of employees possessing by virtue of his official position and employment duties access to the Bank's insider information collected and transferred to the Bank pursuant to Personal Data Protection Act of the Republic of Kazakhstan.
8. The compliance control division provides a list of the Bank's insiders, signed by CEO of the Bank or substituting entity to:
 - 1) the National Bank of the Republic of Kazakhstan (hereinafter – authority) at its demand and within the time lines specified in the demand;
 - 2) stock exchange – on a quarterly bases as on the first day of the months succeeding the reporting quarter, during 30 calendar days upon expiration of the quarter under consideration;

- 3) organizations with regard to which the Bank is the insider (in terms of the Bank employees having access to the insider information of the issuer) – within five working days from the date of receipt of written request.

Article 4. Restrictions for Bank's insiders

1. Insiders may not:
 - 1) use insider information of the Bank when making transactions with securities and other financial instruments;
 - 2) transfer to third parties or make insider information available to third parties, except as required by the laws of the Republic of Kazakhstan;
 - 3) provide recommendations or proposals to third parties on securities transactions based on insider information.
2. Insiders shall take the necessary measures to restrict access to insider information from third parties and their employees who do not need this information to fulfill their official duties.
3. If a threat arises or the fact of unauthorized disclosure of insider information or loss of documents (media) containing the Bank's insider information arises, the insider shall immediately notify the Bank in any convenient manner.
4. When receiving information on violations by the Bank's insiders of the requirements of the Regulations from the responsible departments, including when receiving letters from the stock exchange or from third parties, the Bank initiates an internal audit in order to identify the perpetrators or sources of information leakage. Audit is performed in accordance with internal documents regulating the procedure for conducting internal investigations.
5. Based on the results of the audit, the Bank makes the following decisions:
 - 1) issuing a press release by the Bank on the real situation / situation in in the bank; and / or
 - 2) applying to the relevant stock exchange, financial supervision authority or judicial authorities; and / or
 - 3) strengthening control over compliance with the Regulations; and/or
 - 4) application to the guilty employees of the Bank of disciplinary measures provided for by the labor legislation of the Republic of Kazakhstan and internal documents; and / or
 - 5) compensation of material damage and / or damage to business reputation caused to the Bank by the actions / omissions of the Bank's insider; and / or
 - 6) filing the case to law enforcement agencies to bring perpetrators to justice (if there are signs of a crime); and / or
 - 7) other legitimate measures.

Article 5. Bank as insider of external organizations

1. Bank shall be recognized as insider in regard to as follows:
 - 1) entity, access to insider information of which is granted to Bank due to possession, use and(or) managing directly or indirectly ten or more percent of voting shares (shares of participation in registered capital);
 - 2) entity, access to insider information of which is granted to Bank due to their civil legal relations, concluded agreement, by conditions of which disclosure of insider information to Bank is provided by this entity.
2. Bank employees, who due to their official duty and labor liabilities have access to insider information of entities, in regard to which Bank is recognized as insider, are insiders of specified entities as well.
3. Entities, in regard to which the Bank is recognized as insider, in accordance with legislation of the Republic of Kazakhstan shall independently ensure control over use and management of insider information, access to which is granted to Bank and its employees.

4. When Bank receives notification from external organizations concerning inclusion of Bank into list of organizations insiders, compliance-control service shall as follows:
 - 1) upon agreement with responsible divisions, performs analysis of Bank qualification as insider;
 - 2) in case of positive conclusion, shall include information into list of organizations in regard to which Bank is recognized as insider and shall issue lists of Bank employees, who have access to insider information of these organizations (based on information, provided by responsible divisions). When receiving relevant request from organization, Bank provides these lists of Bank employees within five working days;
 - 3) shall notify Bank employees according to annex 3 to these Rules concerning the fact that they are recognized as insiders of external organizations;
 - 4) shall inform entities, in regard to which Bank is recognized as insider, on its employees, who have access to insider information of the above-mentioned entities due to their official position and labor liabilities, in the manner and terms provided by legislation of the Republic of Kazakhstan;
 - 5) shall perform storing of list of organizations, in regard to which the Bank is recognized as insider of these organizations during five years since moment of their establishment.
5. Bank is not responsible for disclosure of information which may be recognized as insider, if Bank did not receive notification on its inclusion into list of insiders.
6. Bank and its employees, that are insiders upon grounds, provided in clauses 1-2 of this article of Rules are applicable by requirements of legislation of the Republic of Kazakhstan and these Rules on procedure of distribution and use of insider information of entities in regard to which the Bank is recognized as insider.
7. Bank divisions during conclusion of agreements that provide disclosure of insider information to Bank, shall notify compliance-control divisions via electronic document flow system concerning conclusion of relevant agreement and send list of its employees, that have access to insider information of entity, in regard to which Bank is recognized as insider, not later than five working days since conclusion of such agreements.
8. exclusion of Bank employees from list of insiders in regard to which the Bank is recognized as insider, shall be performed in following cases:
 - 1) Bank receipt of notification on Bank exclusion from list of insiders; termination of agreement relations with entity, in regard to which the Bank is recognized as insider;
 - 2) dismissal/replacement of Bank employees.

In order to exclude of Bank employees from list of insiders of the specified entities, responsible divisions of Bank shall notify compliance-control division on the above-mentioned events, by sending message via corporate email/electronic documents flow system .

Article 6. Procedure of granting access to Bank insider information and rules of protecting confidential insider information

1. Access to Bank insider information is limited and shall be performed in accordance with legislation of the Republic of Kazakhstan, these Rules and other internal documents.
2. Bank insiders, that have access to Bank insider information and are notified about it, shall get themselves familiarized with these Rules, posted at official web-site of the Bank www.tengribank.kz and comply with requirements of these Rules, also shall comply with non-disclosure restrictions provided by the Bank, related to Bank insider information, and shall take measures for preventing access of third parties to information.
3. Bank employees have access to information, related to Bank insider information, in the volume, necessary for performance of their own official duties.

Ground for granting access is the order of CEO of the Bank or other person, authorized by CEO, concerning assignment to position or other ordering document (for example, a document for establishment of working group), which suggests use of this information during process of labor liabilities fulfilment.

Access to Bank insider information shall be granted to Bank employee after his/her familiarization with internal documents, regulating procedure of managing confidential information and procedure of work with Bank information system, access to which is provided to employee.

Responsibility for employee familiarization with the above-mentioned documents shall be assigned to his/her head.

4. Bank employee, who according to their status do not have access to insider information and confidential information of the Bank or organization, in regard to which Bank is insider, but for some other reasons information become publicly available, which is related to insider or confidential categories, shall as follows:
 - 1) take measures for protecting confidential insider information;
 - 2) exclude distribution or provision of such insider information to third parties;
 - 3) notify head of structural divisions in which he/she works and compliance-control divisions concerning this fact.
5. In order to ensure confidential insider information, Bank shall as follows:
 - 1) implemented system of controlling access to different levels of Bank information system, provided for distribution of rights among different users and group of users, as well as control for users actions;
 - 2) creates conditions for entities, who have received access to information related to insider information, necessary for the latter to comply with established procedure of using Bank insider information in the territory of the Bank, and for limiting access of unauthorized persons to premises of the Bank, where the material storages of information related to insider information are kept;
 - 3) performs actions in the manner provided by legislation of the Republic of Kazakhstan, aimed for bringing into justice persons, violated procedure of Bank insider information use, and also requires losses compensation, incurred to Bank;
 - 4) performs other actions, aimed for ensuring compliance with procedure of Bank insider information use.
6. Bank may additionally implement special procedures, aimed for protection of confidential insider information of the Bank from illegal use, and for ensuring compliance with procedure of access to insider information, including as follows:
 - 1) procedures of cooperation of structural divisions of the Bank during receipt, use, keeping of insider information, as well as termination of material assets, that include insider information;
 - 2) procedures of retention of working positions, in which access to insider information is performed, and places of keeping information in material storages, related to insider information from unauthorized access and view;
 - 3) procedures of Bank information system security, protecting insider information form loss and unauthorized access to it by communication channels.
7. In order to conclude civil law contracts, for fulfilment of which, third parties may receive access to insider and confidential information of the Bank, agreement shall provide liabilities of third parties concerning compliance with requirements of these Rules. Responsibility for compliance with this clause shall be assigned to responsible divisions, that initiate conclusion of agreements with entities, that receive access to Bank insider information.

Article 7. Procedure and terms of insider information disclosure

1. Bank discloses its insider information by posting it in state and Russian languages as follows:

- 1) by Bank corporate secretary division at:
Web-site of stock market – www.kase.kz;
Internet resource of financial reporting depository – www.dfo.kz.
 - 2) by marketing department at official web-site of the Bank – www.tengribank.kz, in the manner, provided of internal document, regulating procedure of information posting at Bank corporate web-site, based on official note from responsible division of the Bank, sent by means of Electronic document flow system.
2. Publication (posting) of financial reporting, auditors reports and other insider information, which is subject to posting, by means of other mass media sources is not allowed to be performed earlier than date of posting at internet resources of stock market and financial reporting depository.
 3. Bank discloses its insider information as follows:
 - 1) corporate events of the Bank at internet resources of financial reporting depository and stock market in the manner and terms, provided by legislation of the Republic of Kazakhstan and internal documents of stock market;
 - 2) other information, recognized by Bank as insider, by posting it at internet resources of stock market (if its provision is provided by internal documents of stock market), and financial reporting depository, provided by legislation of the Republic of Kazakhstan and internal documents of stock market and(or) shall be posted at Bank official web-site.

Insider information, terms of disclosure of which are not provided by legislation of the Republic of Kazakhstan and(or) internal documents of stock market, is subject to disclosure by the Bank in short terms, if illegal disclosure or leak of such information may affect securities cost change (derivative financial instruments) of the Bank and its activity.

4. When including Bank securities into list of auction organizers, Bank and entities included into list of Bank insiders shall ensure disclosure of insider information about Bank and issued (provided) securities to them (derivative financial instruments), disclosure of which may affect changes in their cost and Bank activity, prior to beginning of securities auction (derivative financial instruments) in the manner and on conditions, provided by rules of auction organizers.
5. When transferring securities, included into list of auction organizers, in trade systems of stock markets, functioning in the territory of foreign countries, insider information of the Bank is subject to disclosure by one of the following methods:
 - 1) messages, that suppose to disclose Bank insider information amongst extended group of entities, shall be sent simultaneously to addresses of all stock markets, which lists include Bank securities, and then they shall be posted at Bank official web-site;
 - 2) messages, that suppose to disclose insider information of the Bank amongst extended group of entities, shall be sent to address of stock market, that functions in the territory of the Republic of Kazakhstan, then they shall be sent to addresses of stock markets, functioning in the territory of foreign countries, which lists include Bank securities and shall be posted at Bank official web-site.

Article 9. Responsibility

1. Heads and employees of Bank responsible divisions are personally responsible for completeness and authenticity of information, provided to compliance-control division, as well as compliance with terms of its provision and keeping its updated (including relevancy of insiders banking details).
2. Head and employees of compliance-control division are personally responsible for list of activities, performed within these Rules.
3. Responsibility for improper fulfilment of these Rules requirements and control over compliance with these Rules shall be assigned to heads of structural divisions, involved in process regulated by these Rules. Bank employees are personally responsible for compliance with requirements of these Rules.

4. Non-fulfilment or improper fulfilment of these Rules shall be considered as non-fulfillment or improper fulfilment of official or other duties by relevant entities, with bringing employees in breach to disciplinary or other justice.

Article 10. Closing provisions

1. Issues, not regulated by these Rules are subject to settlement in accordance with legislation of the Republic of Kazakhstan and/or internal documents.
2. Content of these Rules shall be brought to attention of each employee of the Bank in the manner, established by internal documents.
3. Control over familiarization with these Rules shall be assigned to Heads of structural divisions and branches of the Bank.

Annex 1

to Rules of internal control
over access to insider
information and its use

**LIST of
Bank insider information¹**

1. Bank insider information is referred to as follows:

- 1) information on corporate events, according to clause 5 of article 102 of the Law of the Republic of Kazakhstan on "Securities market", as well as other information, referred to as insider according to decision of Board of Directors of the Bank;
- 2) financial reporting of the Bank and audit reports;
- 3) other, information, besides financial reporting, in regard to financial conditions of the Bank, including but not limited to information on calculation of equity capital adequacy, information on compliance with prudential ratio;
- 4) information on summarized remuneration of members of Bank executive body by results of a year;
- 5) other information, referred to as insider information according to Bank decision, as well as determined as insider in accordance with legislation of the Republic of Kazakhstan.

2. Insider information is not referred to as follows:

- 1) information, prepared on a basis of publicly available information, including investigations, forecasts and evaluation in regard to security cost (derivative financial instrument), property position of Bank, performed for the purposes of making investment decision and(or) preparation of recommendations or suggestions on operations with securities (derivative financial instruments);
- 2) information, received from mass media;
- 3) unconfirmed information, from unknown source, distributed amongst extender group of entities, as well presumptions concerning current and planned activities of the Bank.

¹ Due to amendments to legislation of the Republic of Kazakhstan concerning types of insider information, clauses 1 and 2 of this annex may be amended and/or added by compliance-control division. Therewith, making such amendments and/or additions does not require additional approval by Board of Directors or other authorized body/entity of the Bank.

Annex 2

to Rules of internal control over access to insider information and its use

LIST OF ENTITIES,

that have access to insider information in "Tengri Bank" JSC as of _____ "___", 20__

Name of legal entity, its location (address), email address, telephone, number and date of document, confirming state registration / reregistration of legal entity

On individuals

No.	Last name, first name and patronym	Date of birth	Grounds for inclusion into insiders list	Date of grounds occurrence	Date of exclusion from list
1.					
2.					

On legal entities

No.	Name of legal entity	Date of registration	Grounds for inclusion into insiders list	Date of grounds occurrence	Date of exclusion from list
1.					
2.					

CEO²

² In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.

Annex 3

to Rules of internal control
over access to insider
information and its use

**FORMS OF NOTIFICATIONS on
Attaining insider status of "Tengri Bank" JSC**

**NOTIFICATION
of legal entity on attaining insider status of "Tengri Bank" JSC**

hereby, "Tengri Bank" JSC (hereinafter – Bank) notifies _____
(hereinafter – Organization) about attaining of Bank insider status since _____ "___", 20___, due
to the fact that Organization (*it is required to select one of the below-listed grounds*) is as follows:

has the right to possess, use and (or) manage directly or indirectly ten or more percent of voting
shares of Bank;

auction organizer, the list of which includes derivative financial instruments, issuer of which is the
Bank;

entity, that provides services to Bank in accordance with concluded agreement (including oral
agreement), conditions of which provides disclosure of the Bank insider information.

Therewith, Organization shall comply with requirements of legislation of the Republic of Kazakhstan
concerning use/disclosure of Bank insider information, including Law of the Republic of Kazakhstan on
"Securities market", as well as Rules of internal control over insider information and its use (posted at
official web-site of the Bank www.tengribank.kz), including as follows:

- do not use insider information of Bank during transactions with securities (derivative financial
instruments), the issuer of which is Bank;
- do not disclose to third parties and do not make insider information of Bank available for third
parties, except for cases, provided for by the laws of the Republic of Kazakhstan;
- do not provide third parties with recommendations on transactions with securities, based on insider
information of Bank;
- manage list of own employees, who have access to insider information of the Bank due to their
authorities and labor obligations;
- inform own employees on requirements of the legislation of the Republic of Kazakhstan concerning
prohibition to use insider information of the Bank, and Rules of internal control over access to
insider information and its use;
- inform Bank about own employees, who have access to insider information of the Bank due to
authorities and labor obligations in the manner and terms, provided for by Rules of internal control
over access to insider information and its use;
- inform Bank on social association and self-regulated organization, which Bank is a member of (in
case of disclosure of Bank insider information to such organizations) in the manner and terms,
provided for by Rules of internal control over access to insider information and its use;
- ensure, that personal information of employees sent to Bank, who have access to insider information
of Bank due to their authorities and labor obligations, is collected and sent in accordance with
requirements of the Law of the Republic of Kazakhstan on "Personal information and its
protection";

- Inform social associated and self-regulated organizations, which Bank is a member of, concerning need to comply with requirements of legislation of the Republic of Kazakhstan, including the Law of the Republic of Kazakhstan on "Securities market", concerning prohibition of use of Bank insider information, as well as Rules of internal control to insider information and its use (in case of disclosure of Bank insider information to such organizations).

Organization is fully responsible for violation of requirements of legislation of the Republic Kazakhstan and/or Rules of internal control over access to insider information and its use in accordance with legislation of the Republic of Kazakhstan.

Sincerely Yours,
CEO³

Prepared by:
Last name and name initial
Tel.
Email:

³ In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.

Annex 3

to Rules of internal control
over access to insider
information and its use
(continuation)

**NOTIFICATION of
Individual about attaining insider status of "Tengri Bank" JSC**

Hereby, "Tengri Bank" JSC (hereinafter – Bank) notifies _____
(specify last name, first name and patronym) that, since _____ "___", 201__, You are
referred to as Bank insider in accordance with clause 3 of article 56-1 of the Law of the Republic of
Kazakhstan on "Securities market".

Therewith, You need to comply with requirements of legislation of the Republic of Kazakhstan
concerning use / disclosure of insider information of Bank, including the Law of the Republic of
Kazakhstan on "Securities market", as well as Rules of internal control over access to insider information
and its use (posted at official web-site of the Bank www.tengribank.kz), including as follows:

- do not use insider information of Bank during transactions with securities (derivative financial
instruments), the issuer of which is Bank;
- do not disclose to third parties and do not make insider information of Bank available for third
parties;
- do not provide third parties with recommendations on transactions with securities, based on insider
information of Bank.

You are fully responsible for violation of requirements of legislation of the Republic Kazakhstan and/or
Rules of internal control over access to insider information and its use in accordance with legislation of
the Republic of Kazakhstan.

Sincerely Yours,

CEO⁴

Prepared by:

Last name and name initial

Tel.

Email:

⁴ In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.

Annex 3

to Rules of internal control
over access to insider
information and its use
(continuation)

**NOTIFICATION of
Individual on attaining of insider status of "Tengri Bank" JSC (for Bank employees)**

Hereby, Compliance-control service notifies that _____
_____ (specify last name, first name and patronym) since
_____ "___", 201__, You are referred to as Bank insider in accordance with clause 3 of
article 56-1 of the Law of the Republic of Kazakhstan on "Securities market".

Therewith, You need to comply with requirements of legislation of the Republic of Kazakhstan concerning use / disclosure of insider information of Bank or Organization, including the Law of the Republic of Kazakhstan on "Securities market", as well as Rules of internal control over access to insider information and its use (posted at official web-site of the Bank www.tengribank.kz), including as follows:

- do not use insider information of Bank during transactions with securities (derivative financial instruments), the issuer of which is Bank or Organization, in regard to which the Bank is insider;
- do not disclose to third parties and do not make insider information of Bank or Organization available for third parties, in regard which the Bank is insider, except for cases, provided for by the laws of the Republic of Kazakhstan;
- do not provide third parties with recommendations on transactions with securities, based on insider information of Bank or Organization, in regard to which the Bank is Insider.

You are fully responsible for violation of requirements of legislation of the Republic Kazakhstan and/or Rules of internal control over access to insider information and its use in accordance with legislation of the Republic of Kazakhstan.

Sincerely Yours,

Chief Compliance-controller/
Head of Compliance-control service

Prepared by:

Last name and name initial

Tel.

Email:

Annex 3

to Rules of internal control
over access to insider
information and its use
(continuation)

NOTIFICATION of

**Individual about attaining of insider status of external organization, in regard to which
"Tengri Bank" JSC is insider (for Bank employees)**

Hereby, Compliance-control service notifies _____
_____ (specify last name, first name and patronym) that since
_____ "___", 201__, You are referred to as insider of
_____ (hereinafter – Organization), in accordance
with clause 3 of article 56-1 of the Law of the Republic of Kazakhstan on "Securities market",
and _____.

Therewith, You need to comply with requirements of legislation of the Republic of Kazakhstan concerning use / disclosure of insider information of Organization, including the Law of the Republic of Kazakhstan on "Securities market", including as follows:

- do not use insider information of Organization during transactions with securities (derivative financial instruments), the issuer of which is Organization;
- do not disclose to third parties and do not make insider information of Organization available for third parties, in regard which the Bank is insider, except for cases, provided for by the laws of the Republic of Kazakhstan;
- do not provide third parties with recommendations on transactions with securities, based on insider information of Organization, in regard to which the Bank is Insider.

You are fully responsible for violation of requirements of legislation of the Republic Kazakhstan in accordance with legislation of the Republic of Kazakhstan.

Sincerely Yours,

Chief Compliance-controller/
Head of Compliance-control service

Prepared by:

Last name and name initial

Tel.

Email:

Annex 4

to Rules of internal control
over access to insider
information and its use
(continuation)

**FORMS OF NOTIFICATIONS of
Loss of status of "Tengri Bank" JSC insider"**

**NOTIFICATION of
legal entity about loss of status of "Tengri Bank" JSC insider**

Hereby, "Tengri Bank" JSC notifies _____
(*please specify last name, first name and patronym*) about loss of insider status of "Tengri Bank" JSC
since _____ " __", 20__ .

Sincerely Yours,
CEO⁵

Prepared by:
Last name and name initial
Tel.
Email:

⁵ In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.

Annex 4

to Rules of internal control
over access to insider
information and its use
(continuation)

**NOTIFICATION of
Individual about loss of status of "Tengri Bank" JSC insider**

Hereby, "Tengri Bank" JSC notifies _____
(*please specify last name, first name and patronym*) about loss of insider status of "Tengri Bank" JSC
since _____ " __", 20__ .

Sincerely Yours,
CEO⁶

(for Bank employees: Chief Compliance-controller/
Head of Compliance-control service

Prepared by:
Last name and name initial
Tel.
Email:

⁶ In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.

Annex 4

to Rules of internal control
over access to insider
information and its use
(continuation)

**NOTIFICATION of
Individual about loss of insider status of external organization, in regard to which "Tengri
Bank" JSC is insider (for Bank employees)**

Hereby, "Tengri Bank" JSC notifies _____
(*please specify last name, first name and patronym*) about loss of insider status of
_____ since _____ " __ ", 20__ , in regard to which "Tengri
Bank" JSC is insider.

Sincerely Yours,
CEO⁷

(for Bank employees: Chief Compliance-controller/
Head of Compliance-control service

Prepared by:
Last name and name initial
Tel.
Email:

⁷ In case of absence of Bank CEO, this notification shall be signed by a person, performing his/her duties.