

List of insider information¹

In Subsidiary JSC VTB Bank (Kazakhstan) (hereinafter referred to as the Bank), the following definitions disclosing the concept of "insider information" are fixed in the internal documents, namely:

1) *insider information* - reliable information about securities (derivative financial instruments), transactions with them, as well as about the issuer (Bank) that issued (provided) securities (derivative financial instruments), activities carried out by it, constituting a commercial secret, as well as other information not known to third parties, disclosure of which may affect the change in the value of securities (derivative financial instruments) and the activities of their issuer (Bank);

2) *insider information on corporate events of the issuer (Bank)* - information on events that have a significant impact on the activities of the issuer (Bank), affecting the interests of securities holders and the interests of the issuer (Bank) defined by Article 79 of the Law of the Republic of Kazakhstan "On Joint Stock Companies", Article 102 of the Law of the Republic of Kazakhstan "On Securities Market", the Articles of Association of the Bank and the issuer's (Bank's) equity securities prospectus.

Insider information of the Bank includes the following information:

1. Insider information on changes in the Issuer's (Bank's) activities:

- 1) information on corporate events of the Bank;
- 2) information on the total amount of remuneration of the members of the Management Board of the Issuer (Bank) based on the results of the year;
- 3) information on affiliated persons of the joint stock company (Bank);
- 4) membership of shareholders holding ten and more percent of shares of the Issuer (Bank);
- 5) the list of organizations in which the issuer (Bank) holds ten or more percent of shares (stakes, units) of each such organization;
- 6) annual financial statements of the issuer (Bank) and audit reports of the issuer (Bank) (disclosure of audit reports shall be carried out by issuers subject to mandatory audit in accordance with the Law of the Republic of Kazakhstan "On Auditing");
- 7) methodology for determining the value of a share when it is issued by a joint stock company in the unorganized market;
- 8) quarterly financial statements;
- 9) other information determined by internal documents of the Bank and the laws of the Republic of Kazakhstan.

2. Insider information on corporate events of the issuer (Bank):

- 1) resolutions adopted by the sole shareholder/general meeting of shareholders;
- 2) on election of the Board of Directors of the Bank, the Management Board of the Bank specifying the composition of the Board of Directors of the Bank, as well as changes in the composition of the Board of Directors of the Bank, the Management Board of the Bank;
- 3) on changes in the membership of shareholders holding ten percent or more of voting shares of the issuer (Bank);
- 4) the following resolutions adopted by the Board of Directors of the issuer (Bank):

¹ Clause 8 of the Policy on Disposal and Use of Insider Information in VTB Bank (Kazakhstan) Subsidiary Joint Stock Company, approved by Resolution of the Board of Directors of the Bank No. 23/2023 dated September 11, 2023;

- a) on convening annual and extraordinary general meetings of shareholders;
- b) on placement (sale), including the number of shares to be placed (sold) within the number of authorized shares, method and price of their placement (sale);
- c) on repurchase by the issuer (Bank) of outstanding shares, if the number of shares repurchased by the company exceeds one percent of the total number of placed shares, and their repurchase price;
- d) on the issue of bonds and derivative securities;
- e) on the conclusion of major transactions and/or transactions that simultaneously meet the following conditions: are transactions in which the joint stock company (Bank) has an interest, and are related to the acquisition or alienation of property, the cost of which is ten percent or more of the total the book value of the assets of the joint stock company (Bank) as of the date the authorized body of the joint stock company made a decision on concluding such transactions;
- 5) on conversion of securities and/or other monetary liabilities of the joint stock company (Bank) into ordinary shares of the joint stock company (Bank);
- 6) on exchange of outstanding shares of a joint stock company (Bank) of one type for shares of this joint stock company (Bank) of another type;
- 7) on share split;
- 8) on changes in the list of organizations in which the issuer (Bank) holds ten or more percent of shares (stakes, units) of each such organization;
- 9) on the conclusion by the joint stock company (the Bank) of major transactions and/or transactions that simultaneously meet the following conditions: are transactions in which the joint stock company (Bank) has an interest, and are related to the acquisition or alienation of property, the cost of which is ten percent or more of the total the book value of the assets of the joint stock company (Bank) as of the date the authorized body of the joint stock company (Bank) made a decision on concluding such transactions.
- 10) court decision on forced liquidation or reorganization of the issuer (Bank);
- 11) on pledge (re-pledge) of the issuer's (Bank's) property for the amount equal to ten and more percent of the total book value of the issuer's (Bank's) assets, as well as removal from pledge (re-pledge) of the issuer's (Bank's) property for the amount equal to ten and more percent of the total book value of the issuer's (Bank's) assets;
- 12) on seizure of property (removal of property seizure) of the Bank, the value of which constitutes ten and more percent of the total book value of the issuer's (Bank's) assets;
- 13) on receipt by the issuer (Bank) of a loan in the amount of twenty-five and more percent of the total book value of the issuer's (Bank's) assets, as well as on full repayment of the principal debt and accrued interest on this loan;
- 14) on occurrence of extraordinary circumstances resulting in destruction of the issuer's (Bank's) property, the book value of which amounted to ten and more percent of the total assets of the issuer (Bank);
- 15) on the initiation of proceedings in court on a corporate dispute;
- 16) on obtaining (termination, suspension) of permits of the first category;
- 17) on change of main types of activities by the issuer (Bank) of non-state securities;
- 18) on other events affecting the interests of the issuer's (Bank's) shareholders in accordance with the Articles of Association and the prospectus of issue of equity securities of the issuer (Bank).

According to Clause 2 of Article 56-1 of the Law of the Republic of Kazakhstan dated July 2, 2003 No. 461-II "On Securities Market", ***insider information does not include:***

1) information prepared on the basis of publicly available information, including research, forecasts and evaluation with respect to the value of a security (derivative financial instrument), the issuer's property position, made for the purpose of making investment decisions and/or preparing recommendations or proposals on conducting transactions with securities (derivative financial instruments);

2) information obtained from the mass media;

3) unconfirmed information, the source of which is unknown, disseminated among a wide range of persons, as well as assumptions regarding current or planned activities of the issuer (Bank).