

List of insider information ¹

1. The Bank's insider information shall include the following information:

1) Insider information on corporate events of the issuer (Bank) – the joint-stock company the list of which is defined in paragraph 5 of Article 102 of the Law of the Republic of Kazakhstan "On Securities Market", namely:

a) decisions made by the shareholder/general meeting of shareholders;

b) decisions on election of the governing body, executive body of the issuer (Bank) specifying the composition of the governing body, executive body of the issuer (Bank), as well as changes in the composition of the governing body, executive body of the issuer (Bank);

c) changes in the composition of shareholders holding ten and more percent of voting shares (participatory interest) of the issuer (Bank);

d) the following decisions made by the Board of Directors of the issuer (Bank) or the appropriate body of the issuer (Bank), which is not a joint-stock company, authorized to make these decisions on:

convocation of annual and extraordinary general meetings of shareholders (participants);

placement (sale), including the number of shares to be placed (sold) within the number of authorized shares, method and price of their placement (sale);

repurchase by the issuer of outstanding shares, if the number of shares repurchased by the company exceeds one percent of the total number of outstanding shares, and their repurchase price;

issuance of bonds and derivative securities;

conclusion of major transactions and transactions that simultaneously meet the following conditions: they are transactions in which the joint-stock company has an interest, and are related to the acquisition or alienation of property, the value of which is ten or more percent of the total book value of the assets of the joint-stock company as of the date of deciding to conclude such transactions by the authorized body of the joint-stock company.

e) conversion of securities and (or) other monetary liabilities of the joint-stock company into ordinary shares of the joint-stock company;

f) exchange of outstanding shares of the joint-stock company of one type for shares of this joint-stock company of another type;

g) changes in the list of organizations in which the issuer holds ten and more percent of shares (participatory interest, share of stock) in each such organization;

h) making by the joint-stock company major transactions and transactions that simultaneously meet the following conditions: they are transactions in which the joint-stock company has an interest, and associated with the acquisition or alienation of property, the value of which is ten or more percent of the total book value of the assets of the joint-stock company as of the date of deciding by the authorized body of the joint-stock company to conclude such transactions.

¹ Chapter 5 of Policy on disposition and use of insider information of VTB Bank (Kazakhstan) Subsidiary Joint Stock Company, approved by the Decision of the Board of Directors of Subsidiary JSC VTB Bank (Kazakhstan) No.28/2021 dated 27.07.2021

Information on a transaction resulting in the acquisition or alienation of property worth ten percent or more of the joint-stock company's assets shall include information on the parties to the transaction; the assets acquired or alienated, the terms and conditions of the transaction, and, if available, other information on the transaction.

i) court decision on compulsory liquidation or reorganization of the issuer (Bank);

j) pledging (re-pledging) the property of the issuer (Bank) in the amount of ten or more percent of the total book value of the assets of the issuer (Bank), as well as discharging of pledge (re-pledge) the property of the issuer (Bank) in the amount of ten or more percent of the total book value of the assets of the issuer (Bank);

k) attachment of property (release from the attachment of property) of the issuer (Bank), the value of which is ten or more percent of the total book value of assets of the issuer (Bank);

l) receiving by the issuer of a loan in the amount of twenty-five and more percent of the total book value of the assets of the issuer (Banks), as well as full repayment of the principal debt and accrued interest on this loan;

m) occurrence of force-majeure circumstances, as a result of which the property of the issuer (Bank), the book value of which was ten or more percent of the total assets of the issuer (Bank), was destroyed;

n) initiating court proceedings in a corporate dispute;

o) obtaining (termination, suspension) first category permits;

p) changing the core activities by the issuer of non-government securities;

q) other events affecting interests of shareholders (participants) of the issuer (Bank) according to the charter and prospectus of issue of equity securities of the issuer (Bank).

2) Insider information on changes in the issuer's (Bank's) activities affecting interests of holders of its securities specified in paragraph 2 of Article 102 of the Law of the Republic of Kazakhstan "On Securities Market".

Changes in the issuer's (Bank's) activities affecting the interests of its securities holders shall be deemed to be:

a) information on corporate events of the issuer (Bank);

b) information on the total amount of remuneration of the members of the executive body of the issuer (Bank) according to the results of the year;

c) information on affiliated persons of the issuer (Bank);

d) the composition of shareholders (participants) holding ten and more percent of voting shares (participatory interest) of the Bank issuer;

e) the list of organizations in which the issuer (the Bank) owns ten and more percent of shares (participatory interest, share of stock) of each such organization;

f) annual financial statements of the issuer (Bank) and audit reports of the issuer (disclosure of audit reports shall be made by issuers subject to mandatory audit according to the Law of the Republic of Kazakhstan "On Auditing");

g) prospectus of issue of issuable securities of the issuer taking into account amendments and (or) additions made thereof;

h) report on the results of placement of shares.