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**Information Policy**

**of the National Company**

**"QazExpoCongress" Joint Stock Company**

**Astana, 2023**

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1. General provisions
	1. This Information Policy of the National Company "QazExpoCongress" Joint Stock Company (hereinafter – the "Information Policy") has been drawn up in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code (hereinafter – the "Code"), and other internal documents of the NC "QazExpoCongress" JSC (hereinafter – the "Company").
	2. The Information Policy sets goals, basic principles and rules for disclosure of information about the Company's activities, defines a list of publicly available information and information comprising official and trade/commercial secrets or other secret protected by law, and also regulates the procedure, forms, methods and terms of disclosure of this information.
	3. The procedure for providing and receiving information related to State secrets and other information related to State secrets is established and implemented in line with the legislation of the Republic of Kazakhstan on this category of information, and this Information Policy does not regulate such relations.
	4. The following terms and definitions are used in this Information Policy:

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| *Bodies of the Company* | Sole Shareholder, Board of Directors, Management Board, Internal Audit Service |
| *Sole Shareholder* | Ministry of Trade and Integration of the Republic of Kazakhstan |
| *Board of Directors* | Management body of the Company |
| *Management* | Deputy Chairmen of the Management Board and Managing Directors of the Company |
| *Management Board* | Executive Body of the Company |
| *Chairman of the Management Board* | Chairman of the Management Board of the Company |
| *Corporate Secretary* | Corporate Secretary of the Company |
| *Recipients of information (Recipients)* | Sole shareholder, members of the Board of Directors, staff of the Company, State bodies, (potential) investors and sponsors, business partners, creditors, rating agencies, analysts, consultants, the public, interested and other parties concerned of the receipt of such information |
| *Interested party* | A person whose rights, provided for by the Legislation and the Charter, are related to the Company's activities |
| *Stakeholders* | Individuals, legal entities, groups of individuals or legal entities that influence the Company or may be influenced by the Company |
| *Authorized body* | State body implementing government-level regulation of the securities market |
| *Corporate events* | Events that have a significant impact on the Company's activities, affecting the interests of the Sole Shareholder and investors of the Company |
| *Legislation* | A set of statutory instruments of the Republic of Kazakhstan adopted in accordance with the established procedure and international agreements of the Republic of Kazakhstan ratified in line with the established procedure |
| *Charter* | Charter of the Company |
| *Disclosure*  | Ensuring the availability of information to all interested parties, regardless of the purpose of obtaining this information, as well as providing information to the Sole Shareholder, State bodies/the public and other stakeholders using appropriate disclosure methods |
| *Trade/commercial secrets*  | Information determined and protected by the Company, having actual or potential commercial value due to its unknown to third parties, there is no free access to it on a legal basis, disclosure, receipt, use of which may harm the interests of the Company |
| *Official secrecy*  | Information having the nature of separate data, the disclosure or loss of which may harm the interests of the Company, and in relation to which the Company takes measures to protect its confidentiality |
| *Depository of Financial Statements*  | An electronic database containing annual financial statements and auditor's reports submitted annually by entities, as well as information about corporate events of joint stock companies, with open user access |
| *Internet resources of the Company* | Internet resources used by the Company: corporate website [www.qazexpocongress.kz](http://www.qazexpocongress.kz) |

* 1. The terms used, but not defined in the Information Policy, are used in the sense in which they are used in the legislation, the Charter, the Code and other internal regulatory documents of the Company.
	2. In the event of amendments to the legislation, the Charter or the Code, the norms of this Information Policy shall apply to the extent that does not contradict the legislation and the above-mentioned documents of the Company.
	3. The Company posts this Information Policy on its Internet resources or in a place accessible to interested parties, and provided upon their request.
1. Internal information policy
	1. All employees of the Company must have equal access to information about the Company's activities and use the information resources necessary for them to perform their official duties, taking into account compliance with the requirements for keeping safe the State, official and trade/commercial secrets or other secret protected by law.
	2. The Company shall ensures high awareness of the Company's employees about its activities, timely receipt of both internal and public information by them, continuous improvement of the level of knowledge about the Company.
2. External information policy
	1. The Company operates following the information transparency and openness in relation to its Recipients of information. The level of information transparency and openness is determined by the legislation, the Company's obligations, as well as the principles for corporate governance recognized in international practice in the field of information disclosure.
	2. The Company is committed to increase the level of awareness of the Recipients of information about its activities.
3. Implementation of Information Policy
	1. To implement this Information Policy, the Company:

- keeps records of information (data), the disclosure of which is mandatory in accordance with the requirements of the legislation, the Charter, the Code and internal documents of the Company;

- establishes the procedure for disclosure;

- determines the list of information comprising confidential information of the Company, the disclosure (transfer, leakage) of which may harm the interests of the Company, and establishes the necessary measures, compliance with which facilitates to ensuring the safety of confidential information;

- establishes a system of control over the dissemination of information about the Company by determining the methods, forms and procedure for the dissemination of information, as well as determining the individuals responsible for the preparation and dissemination of information to be disclosed;

- determines the competence and responsibility of the Company's bodies, officials and employees of the Company for ensuring proper disclosure about the Company and the safety of confidential information.

- creates a unified information space, in order to provide the necessary conditions for the implementation of this Information Policy, which will ensure the control of information transmitted through information and communication technologies both within the Company and beyond.

1. Goals of Information Policy
	1. This Information Policy has been drawn up:
* to protect the rights and interests of the Sole Shareholder;
* for the Company to comply with the requirements of the legislation, including mandatory disclosure;
* to raise public awareness of the Company's activities both inside and outside Kazakhstan;
* provide information to the Recipients of information in a scope adequate for them to make informed decisions or perform any actions;

- determine disclosure mechanisms in accordance with the requirements of the legislation of the Republic of Kazakhstan;

- establish general rules on information comprising official and trade/commercial secrets or other secret protected by law, as well as measures aimed at protecting them from illegal disclosure;

- improve the Company's corporate governance system.

* 1. The Information Policy is implemented in line with the requirements of the legislation in the interests of the Company and its Sole Shareholder, and should facilitate to shaping a positive public opinion and a favorable image of the Company by increasing its information openness and transparency, strengthening the trust of investors and the public and increasing investment attractiveness.
1. Principles for information disclosure
	1. The main principles for the Company's information disclosure are as follows:

**-** *the principle of regularity, timeliness and relevance* of information disclosure means the Company's responsibility to provide information to Recipients of information regularly and consistently, using all means of information available to the Company, in compliance with time-frames and other requirements provided for by Legislation, the Charter, the Code, this Information Policy and other documents of the Company, as well as as necessary the occurrence of an event according to the extent of its significance and taking into account the timeliness of public disclosure;

**-** *the timely disclosure* means the Company's intention to provide information about the Company's activities, as well as about the most significant events and facts having an influence on the Company's activities and affecting the interests of Information Recipients in the shortest possible time necessary for them to make appropriate decisions or perform any actions;

**-** *the principle of openness and accessibility* of information means the Company's choice of such information distribution channels, access to which is free, easy and low-cost, as well as the Company's intention to ensure maximum transparency of information about its activities, taking into account the confidentiality status with respect to information comprising official and trade/commercial secrets or other secret protected by law;

*- the principle of reliability and completeness* means the responsibility of the Company in providing stakeholders with true and accurate information, without distorting the facts known to the Company, and adequate to understand the disclosed fact or event in full, as well as to create a complete picture of the Company's activities;

*- the principle of objectivity* means the Company's obligation not to evade from disclosing adverse information about its activities if it relates to information disclosed by the Company on a compulsory basis in accordance with the legislation, the Charter, the Code, this Information Policy, and other internal documents of the Company, is not confidential and is material, that is, capable of influencing the adoption of investment and other decisions by Recipients of information;

* *the principle of balance* means ensuring by the Company a reasonable balance of openness and transparency, on the one hand, and confidentiality restrictions, on the other, in order to ensure maximum realization of the rights of Information Recipients, but subject to strict observance of the interests of the Company, its Sole Shareholder in terms of restricting access to information comprising official and trade/commercial secrets or other secret protected by law;

*- the principle of consistency* means that the Company ensures consistency in the disclosed information in all material respects with previously disclosed information in relation to similar or interrelated issues, and it is compiled in compliance with the same approaches and principles so that the Recipients of the information can analyze and use it in chronological order;

*- the principle of equality* means that the Company ensures equal rights and opportunities for all Recipients of information with respect to access to information about the Company's activities affecting their interests, without giving advantages to one Recipient of information over others (selective disclosure of information), except in cases provided for by legislation, the Charter, the Code, this Information Policy, and other documents of the Company;

*- the principle of ensuring information security* means the use by the Company of methods and means permitted by law to protect information comprising official and trade/commercial secrets or other secret protected by law.

1. Forms and methods of disclosure
	1. When distributing information, the Company uses the following communication means and forms:
* *a written document* drafted for the Recipients of information, including, but not limited to: responses to inquiries, press releases, publications (messages) in the media, brochures, reports on the Company's activities, documents for employees;
* *verbal communication,* including, but not limited to: interviews, press conferences, speeches at meetings and public events inside and outside the Company;
* *audio-visual recording*, including, but not limited to: video clips, corporate videos, speeches or interviews on radio and TV shows, slides and other means of visual presentation used at meetings, public and other events (conferences) both internally and externally;
* *electronic materials* sent by e-mail and transmitted on electronic media (disks, flash drives and other media);
* *other forms*, including mixed ones, provided for by the legislation, the Charter, this Information Policy, and other internal documents of the Company.
	1. Information is disclosed to Recipients, interested parties and stakeholders by the Company in the ways as follows:
* *provision of direct access* to documents, information (materials) at the Company's location in line with the procedure provided for by the Legislation, the Charter, this Information Policy, and other internal documents of the Company;
* *publication in mass media*, both in printed publications (newspapers, magazines, brochures, booklets) and online media outlets;
* *posting on the Internet*, on the Internet resources of the Company, on the Internet resources of the Depository of Financial Statements, Stock Exchange, as well as on the official pages of the Company in social networks;
* *posting on the* Company*'s internal resources;*
* *by holding press conferences*, conferences, forums, round tables, workshops, and other public ac, activities s well as meetings and negotiations with Recipients of information;
* *other methods* provided for by the legislation, the Charter, the Code, this Information Policy, and other internal documents of the Company.
	1. When disclosing information, the Company uses the following distribution channels: *publications, interviews, promotional content, articles, and public speaking engagements, formal and informal correspondence*.
	2. The Company chooses a certain method, form and channels of information dissemination based on the need to outreach a certain number of Information Recipients or deliver information to a specific target audience, as well as depending on the thematic focus of the information in line with the requirements of Legislation and internal documents of the Company.
	3. The Company holds the necessary PR events in accordance with the approved Action Plan for information coverage of the Company's activities, and also conducts the necessary information coverage outside of the specified approved Action Plan, as necessary and (or) at the initiative of the Company's structural divisions in agreement with the Chairman of the Management Board.
1. Information disclosure procedure
	1. From time to time, the Board of Directors shall approve, review and continuously improve this Information Policy.
	2. The Management Board discloses and keeps safe information about the Company's activities in accordance with the requirements of the Legislation and internal documents of the Company.
	3. The Director of the Creative Solutions Department monitors the timely disclosure of information by the Company, shall ensure the timely provision of information by the Company, as well as maintaining a high level of information transparency of the Company in line with the procedure established by Legislation, the Charter, this Information Policy, and other internal documents of the Company.
	4. The Corporate Secretary shall ensure the conditions for storage of documents related to the Company's activities, which should be stored in line with the Legislation and the Charter, provide access to them, and provide copies to interested parties and other individuals. The signature of the Corporate Secretary authenticates copies of such documents.
	5. The Internal Audit Service evaluates compliance with the requirements of the Legislation and internal documents of the Company in terms of information disclosure, its safety and security.
	6. The Chairman of the Board of Directors has the right to officially comment on decisions taken by the Board of Directors, as well as to state the official point of view of the Board of Directors on issues considered at meetings of the Board of Directors, taking into account compliance with the requirements for keeping safe the State, official and trade/commercial secrets or other secret protected by law.
	7. Members of the Board of Directors have the right to express their views on issues considered at meetings of the Board of Directors (Committees), as well as on decisions taken at meetings of the Board of Directors (Committees), taking into account compliance with the requirements to ensure the security of the State, official and trade/commercial secrets or other secret protected by law.
	8. It is the exclusive right of the Chairman of the Management Board to make public statements on issues related to the Company's activities.
	9. The Chairman of the Management Board has the right to delegate to the Company's employees, in accordance with the procedure established by the Company's internal documents, the right to publicly speak (provide information) on behalf of the Company at meetings and meetings of committees, government or other authorized bodies held in the country and abroad, press conferences, conferences, forums, workshops, other public events, as well as to make comments for Kazakh and foreign mass media, taking into account compliance with the requirements for keeping safe the State, official and trade/commercial secrets or other secret protected by law.
	10. The subject matter of the disclosed information, publications, texts of statements of the Company's employees are necessarily agreed with the Chairman of the Management Board and (or) the Director of the Creative Solutions Department of the Company.
	11. Employees of the Company participating in events providing for public disclosure about the Company's activities are personally liable for incorrect statements, distortion of information (statements, comments, interviews, publications, etc.), which affected the business reputation and financial, investment indicators of the Company.
	12. Persons who are not duly authorized to make public speeches on behalf of the Company have no right to comment, answer any questions or requests concerning the Company.
	13. If persons who are not authorized to make public speeches on behalf of the Company violate the disclosure procedure established by the Company, any information provided by them cannot be regarded as official. If necessary, the Creative Solutions Department should prepare and distribute an appropriate official denial.
	14. The Company's employees are not allowed to disseminate information about the Company, including for the purpose of its publication, without the prior consent of the Chairman of the Management Board and (or) the Director of the Creative Solutions Department of the Company.
	15. In the case of receiving a request for information about the Company, the employee shall inform his/her immediate superior about the receipt of such a request. The request can be forwarded to the Chairman of the Management Board or the Director of the Creative Solutions Department of the Company. This rule does not apply to the information sharing in a working order between the Company's employees while performing their job duties. Each case of unauthorized dissemination of information may serve as a basis for conducting an internal investigation in line with the Company's internal regulations.
	16. Structural divisions of the Company considering a particular issue are responsible for the preparation of reliable and complete information to be disclosed, as well as compliance with the terms and procedure for disclosure according to the requirements of Legislation, the Charter, this Information Policy, and other internal documents of the Company.
	17. The competence and responsibility of officials, employees and bodies of the Company for disclosure, preservation and protection of information is established based on the Legislation and internal documents of the Company.
	18. Management is responsible for compliance with this Information Policy by managers and employees of the structural divisions.
	19. Heads of structural divisions are responsible for compliance with this Information Policy by employees of the structural divisions headed by them, including for violation by employees of the procedure for disclosure while liaising with State bodies, organizations and other Recipients of information.
	20. In the event of violation of the Legislation, the Charter, this Information Policy and other internal documents of the Company in the process of disclosure, which led to damage to the Company and (or) the Sole Shareholder, those responsible can be held accountable in accordance with the procedure established by the laws of the Republic of Kazakhstan.
2. Information to be disclosed
	1. Information about the Company's activities is broken down into four groups:

- information related to publicly available information;

- information to be disclosed to the Sole Shareholder;

- information to be submitted in a mandatory manner established by authorized State bodies;

- information to be disclosed to interested parties and other individuals.

1. Publicly available information
	1. Publicly available information is information subject to mandatory public disclosure, as well as information that is not related to information comprising official and trade/commercial secrets or other secret protected by law.
	2. Pursuant to the legislation the Company shall disclose:
* the decision of the Sole Shareholder on the payment and non-payment of dividends on ordinary shares of the Company, within 10 (ten) business days from the date the decision is made, by publishing it in the mass media;
* information on corporate events of the Company to be brought to the attention of the Sole Shareholder and investors pursuant to the Law of the Republic of Kazakhstan "On Joint Stock Companies", within the period established by the legislation and internal regulatory documents of the Company;

- information on changes in the Company's activities affecting the interests of securities holders in accordance with the Law of the Republic of Kazakhstan "On the Securities Market", within the period established by the legislation and internal regulatory documents of the Company;

- annual financial statements with an Auditor's Report (Report), annually, no later than August 31 of the year following the reporting year;

- the list of affiliated persons of the Company, as of 1 January, 1 April, 1 July and 1 October of the reporting year no later than 31 January, 30 April, 31 July and 31 October of the reporting year, accordingly. The list of affiliated persons is to be signed by the Chairman of the Management Board. The procedure for the Sole Shareholder and the Company's officials to provide information about their affiliated persons is established by the legislation;

- information on the total amount of remuneration of members of the Executive Body for the year, annually, no later than 31 August following the reporting year;

- information on decisions taken by the Board of Directors on the list of issues, information about which is brought to the attention of shareholders and investors, in line with Appendix No. 1 hereto, within the time-frames established by the legislation and internal regulatory documents of the Company;

- other information provided by the Listing Rules of the stock exchange, within the time-frame established by the Listing Rules of the stock exchange;

- information about the members of the Board of Directors;

- other information subject to disclosure in accordance with the legislation, the Charter and internal regulatory documents of the Company within the established deadlines.

* 1. The above information is to be disclosed by posting it on the Company's Internet resources, the Internet resources of the Depository of Financial Statements and the Stock Exchange in line with the internal regulatory document approved by the Company's Management Board regulating the disclosure procedure, the responsibility of each structural unit and persons for providing/updating information, the list of information to be disclosed, including the map of the Company's corporate website.
	2. If the information disclosed by the Company on Internet resources is identical to the information disclosed on the Internet resources of the Depository of Financial Statements and the Stock Exchange, then the full text of this information and/or a link to the Internet resources of the Depository of Financial Statements and/or the Stock Exchange should be posted in Kazakh, Russian and English languages (if necessary) within the time-frames established by law, but not earlier than the date of its placement on the Internet resource of the Stock Exchange.
	3. Information, the terms of disclosure of which are not set by the legislation, this Information Policy, and internal regulatory documents of the Company, must be posted on Internet resources no later than 30 (thirty) calendar days from the date of occurrence of the relevant event, or within 30 (thirty) calendar days from the date of updating / receiving of information.
	4. The Company also shall send information specified in paragraph 10.2(3) of this Information Policy to the authorized body and representatives of the bondholders within 15 calendar days from the date of occurrence of the information.
	5. For the purpose of compliance with the best practices of information disclosure, as well as for a wide range of interested parties, the Company annually issues an annual report on the results of its activities.
	6. The Annual Report is to be approved by the decision of the Board of Directors of the Company for the corresponding year.
1. Disclosure of information not classified as publicly available information
	1. The Company provides interested parties with information not classified by this Regulation as publicly available information, and not related in accordance with the Company's internal documents to confidential information, official and trade/commercial secrets or other secret protected by law, in accordance with the procedure and deadlines provided for by the legislation of the Republic of Kazakhstan.
2. Disclosure to the Sole Shareholder
	1. In order to protect the rights and interests of the Sole Shareholder, the Company shall provide access to documents and information about the Company to the Sole Shareholder, including at its request, in accordance with the procedure provided for by Legislation, the Charter, the Code, this Information Policy, and other internal documents of the Company.
	2. The Sole Shareholder is to be provided with the information as follows:

- information affecting the interests of the Sole Shareholder;

- the Company's annual Financial Statements;

- the results of the Audits of the financial and economic activities of the Company;

- other information and documents in accordance with the Legislation, the Charter, decisions of the Company's bodies, and internal documents of the Company.

* 1. The following is regarded as the information affecting the interests of the Sole Shareholder:

- decisions taken by the Sole Shareholder and the Board of Directors, and information on the implementation of decisions taken;

- issue by the Company of shares and other securities and approval by the authorized body of reports on the results of placement of the Company's securities, reports on the results of placement of the Company's securities, reports on the results of redemption of the Company's securities, cancellation by the authorized body of the Company's securities;

- implementation by the Company of major transactions and transactions in which the Company has an interest;

- pledge (re-pledge) of the Company's property for the amount of five percent or more of the Company's assets;

- receipt by the Company of a loan of twenty-five percent or more of the Company's equity;

- obtaining licenses by the Company to carry out any types of activities, suspension or termination of the licenses previously obtained by the Company to carry out any types of activities;

- participation of the Company in the establishment of a legal entity;

- seizure of the Company's property;

- circumstances of an extraordinary nature, as a result of which the Company's property was destroyed, the carrying amount of which was ten percent or more of the Company's total assets;

- bringing the Company and its officials to administrative liability;

- initiation of a corporate dispute case in court;

- decisions on compulsory reorganization of the Company;

- other information affecting the interests of the Sole Shareholder pursuant to the Legislation, the Charter, as well as the Company's prospectus of share issue.

* 1. A structural unit whose competence includes document flow issues shall control over the timely consideration by the Company of the Sole Shareholder's requests and the timely provision of information and (or) documents to the Sole Shareholder. The relevant structural subdivision of the Company shall be responsible for timely provision of reliable and complete information and (or) documents to the Sole Shareholder, within its competence. Individuals who have not complied with the terms and procedure for providing information and (or) documents to the Sole Shareholder may be brought to disciplinary and other liability established by the Legislation.
	2. The legislation, the Charter and internal documents of the Company provide for the procedure and terms for providing information to the Sole Shareholder.
1. Disclosure of information to members of the Board of Directors
	1. The Company shall ensure that members of the Board of Directors are provided with information about their activities within the framework of issues submitted to the Board of Directors, taking into account compliance with the requirements for keeping safe the State, official and trade/commercial secrets or other secret protected by law, within the time-frames and in line with the procedure established by law, the Charter, the Code, and internal documents of the Company.
	2. Information for members of the Board of Directors outside the process of drafting information for meetings of the Board of Directors is to be provided according to a written request signed by a member of the Board of Directors addressed to the Chairman of the Management Board.
	3. The Corporate Secretary shall keep records of requests from members of the Board of Directors and ensure control over the timely consideration by the Company of requests from members of the Board of Directors, and timely provision of information and (or) documents to members of the Board of Directors. The structural divisions of the Company, within their competence, shall draft and prepare information to be disclosed to a member of the Board of Directors, based on the relevant decision of the Chairman of the Management Board or his/her deputy.
	4. The information requested by the members of the Board of Directors is to be sent with the signature of the Chairman of the Management Board or his/her deputy.
	5. Members of the Board of Directors are liable in accordance with the legislation to the Company and the Sole Shareholder for damage caused to the Company because of unauthorized disclosure of information comprising the State, official, trade/commercial, and other legally protected secrets of the Company.
2. Disclosure of information to the State bodies of the Republic of Kazakhstan
	1. The Company shall disclose information subject to mandatory disclosure to the State bodies of the Republic of Kazakhstan in cases, in accordance with the procedure, at intervals and within the time-frames established by legislation, the Charter, internal documents, as well as the relevant obligations of the Company.
	2. The Company necessarily discloses information to the following State bodies, including, but not limited to:

- the authorized body in State regulation, control and supervision of the financial market and financial entities;

- the authorized State body for tax control and taxation;

- the authorized State body on statistics.

* 1. In accordance with the requests of State bodies, in cases stipulated by law, the Company shall provide them with relevant information within its competence. Confidential information is to be provided to State bodies taking into account the requirements of the legislation and internal regulatory documents of the Company. At the same time, the Company may require the State bodies to which the information is provided to comply with the obligations to ensure its confidentiality.
	2. In the event the Company is not charged by the Legislation to provide such information, and (or) if the requested subject is out of the competence of the relevant State bodies, the decision on the appropriateness of providing the requested information in each specific case is to be made by the Chairman of the Management Board.
	3. The Company has the right not to grant state bodies and officials, when performing registration, control functions and performing other actions, access to information comprising trade/commercial secrets, except for that which is necessary for the implementation of the functions assigned to them and for the execution by the Company of official requests made in line with the legislation of the Republic of Kazakhstan.
	4. Information comprising a trade/commercial and other legally protected secret may not be disclosed without the consent of the Company, except for information on which there is a court decision that has entered into force.
1. Disclosure of information to interested parties and other individuals
	1. The Company shall provide interested parties and stakeholders with access to information affecting their rights and interests timely and regularly, on the grounds and in accordance with the procedure provided for by Legislation, the Charter, the Code, this Information Policy, and other internal documents of the Company.
	2. Information about the Company and its activities is provided to interested parties and other individuals on the basis of their justified written requests, taking into account compliance with the requirements for keeping safe the State, official information, trade/commercial secrets, and other secrets protected by law.
	3. In accordance with the internal documents of the Company, the decision to provide such information is made by the Chairman of the Management Board or another official.
2. Spreading information through mass media
	1. The Company shall carry out the necessary information activities in accordance with the approved Media Plan and, if necessary, outside the approved Media Plan at the initiative of the Company's structural divisions with the approval of the Chairman of the Management Board of the Company.

As the need arises, the Company shall draft and distribute materials through the mass media, including using the Internet, for the widest possible and prompt presentation of information about its activities.

* 1. The Company shall hold various events for the mass media establish continuous links with journalists, monitor the mass media. The information is to be published in the form of publications, articles, press releases, etc. (the "information coverage") in the leading republican/foreign electronic and print media. Information coverage of the Company's activities is to be carried out in the form of press conferences, briefings, interviews and other forms.
	2. The Company may disclose information about its activities through television, radio, video, newsreel and audiovisual programs.
	3. The Company in the republican newspapers Kazakhstanskaya Pravda, Egemen Kazakhstan, publishes information subject to mandatory publication by the Company according to the Legislation.
	4. The Department of Creative Solutions of the Company coordinates drafting, compilation, processing of information disseminated in the mass media, dissemination of information, provision of responses to requests from media representatives, arrangement of public events.
	5. If adverse information appears in the media that may damage the image of the Company, the Creative Solutions Department determines the level of threat to reputation and, in case of an increased threat, informs the Chairman of the Management Board of the Company about it, promptly responds to adverse information, approves and implements an appropriate Action Plan for anti-crisis management of information flows and disclosure of information.
1. Posting on the Company's official website
	1. The Company shall maintain its official website on an ongoing basis. Information and materials are to be posted on the Company's website in Kazakh and Russian languages, as well as, if necessary, in English.
	2. The following information and documents should be posted on the Company's website:
2. general information about the Company, including information about the mission, main objectives, goals and activities, the amount of equity, the amount of assets, net income and the number of personnel;
3. about the Development Plan and/or Action Plan (strategic goals); priority areas of activity;
4. The Charter and internal documents of the Company regulating the activities of bodies, committees, Corporate Secretary;
5. about ethical principles;
6. about risk management;
7. about the dividend policy;
8. about the members of the board of Directors, including the information as follows: photo (in agreement with a member of the board of directors), surname, first name, patronymic, date of birth, citizenship, status of a member of the board of directors (independent director, representative of the Sole Shareholder), the functions of a member of the board of directors, including membership in committees under the Board of Directors or performance of functions of the Chairman of the Board of Directors, education, including basic and supplementary education (name of academic institution, year of graduation, qualification, degree), work experience over the past five years, main place of work and other positions currently held, professional qualifications, date of first election to the board of directors and date of election to the current Board Directors, number and share of shares owned by affiliated organizations, criteria of independent directors;
9. about the members of the Management Board, including the information as follows: photo, surname, first name, patronymic, date of birth, citizenship, position and functions performed, education, including basic and supplementary education (name of academic institution, year of graduation, qualification, degree), work experience over the past five years, professional qualifications, positions, held concurrently, the number and share of shares owned by affiliated organizations;
10. about financial statements;
11. about annual reports;
12. about the external auditor;
13. about procurement activities, including rules, procurement plan, announcements and procurement results;
14. on the structure of the share capital, including the information as follows: the number and nominal value of issued shares (participation shares), a description of the rights granted by shares, the number and nominal value of declared but outstanding shares, the composition of shareholders (participants), the number and share of common shares (participation shares) owned by them, the procedure for disposing of ownership rights;
15. about the structure of assets, including information about affiliated entities at all levels with a brief description of the scope of their activities;
16. about the annual calendar of corporate events;
17. interested party transactions, including information about the parties to the transaction, the essential terms of the transaction (the subject of the transaction, the transaction price), the body that made the decision to approve the transaction;
18. about major transactions, including information about the parties to the transaction, the essential terms of the transaction (the subject of the transaction, the transaction price), the body that made the decision to approve the transaction;
19. about activities related to sustainable development;
20. on the amount of approved dividends;
21. about news and press releases (press releases, digest of news materials of Kazakh and foreign media, photo gallery, video gallery, presentations, logo and other materials).
	1. Other information and documents (materials) subject to disclosure in accordance with the legislation, the Charter, the Code or internal documents of the Company, or disclosed voluntarily at the discretion of the Company.
	2. Also, the following information may be posted on the Company's website:
22. Information about Kazakhstan;
23. Information about the Astana;
24. History of EXPO exhibitions;
25. Information about the International Exhibition Bureau;
26. Conventions governing the activities of international exhibitions;
27. Information about Kazakhstan's participation in EXPO exhibitions;
28. Information about EXPO-2017 exhibition;
29. Information about events (contests, festivals, conferences) arranged and conducted by the Company;
30. Information about sponsors;
31. Information about partners;
32. Information about tourist exhibitions, tourist products, tourist maps and routes;
33. The story of the foundation of the Company;
34. News (world, "green", local);
35. Contact information;
	1. A significant corporate event is to be disclosed by publishing a notice of a significant corporate event on the official website of the Company within 5 (five) business days from the date of occurrence of a significant corporate event, unless other time-frames are established by Legislation or the Company's internal documents.
	2. The structural unit, whose competence includes corporate event issues, shall compile a separate message for each major corporate event, coordinate the message with the supervising Deputy Chairman of the Management Board, and receive a resolution from the Chairman of the Management Board of the Company on publishing such a message on the Company's website and posting it on the Internet resource of the Depository of Financial Statements .
	3. The Company shall place publications, interviews, marketing materials, articles, speeches at events, news, press releases and other information about the Company on its website.
	4. The press release is to be drafted by a person whose competence includes the subject of the news report together with the Creative Solutions Department of the Company, approved by the supervising Deputy Chairman of the Management Board. After that, it is to be posted on the Company's website, transmitted to the mass media for dissemination.
	5. The Department of Creative Solutions of the Company coordinates the process of drafting, compilation, final processing of information to be published on the website, verification of compliance with the Information Policy of the Company, publication on the website.
	6. The responsibility of structural divisions for timely, complete and quality updating of information on the website, as well as the procedure for providing information for the website is specified in the Company's internal documents.
36. Disclosure of information in the form of an Annual Report
	1. The Company annually publishes a detailed Annual Report on its activities.
	2. The Annual Report shall include, but is not limited to, the information as follows:

1) address by the Chairman of the Board of Directors of the Company;

2) address by the Chairman of the Management Board;

3) about the Company: general information; about the structure of the share capital, including the following information: the number and nominal value of issued shares (participation shares), a description of the rights granted by shares, the number and nominal value of declared but outstanding shares, the composition of shareholders (participants) and the number and share of common shares (participation shares) owned by them), the procedure for disposal of property rights; mission; Development Plan, results of its implementation; market overview and market position;

4) results of financial and operational performance for the reporting year: review and analysis of activities regarding the tasks set; operational and financial performance indicators; key significant events and achievements; information on significant transactions; any financial support, including guarantees received from the State and any obligations to the State and the Company assumed by the Company (if not disclosed in accordance with international financial reporting standards);

5) asset structure, including subsidiaries/affiliates of all levels, overview, main results of their financial and production activities;

6) goals and plans for future periods;

7) main risk factors and risk management system;

8) corporate governance: corporate governance structure; Sole Shareholder and ownership structure; composition of the Board of Directors, including qualifications, selection process, including independent directors with criteria for determining their independence; report on the activities of the Board of Directors and its Committees; information on the compliance of corporate governance practices with the principles of this Code, and if it is not compliant, the reasons for non-compliance with each of the principles; composition of the Company's Management Board; report on the activities of the Management Board; remuneration policy of officials;

9) sustainable development (in the case of preparation of a separate report in the field of sustainable development, it is possible to provide a link to this report);

10) Auditor's Report and Financial Statements with notes;

11) the analytical indicators and data included in the Annual Report reflect a comparative analysis and the progress achieved (regression) in relation to the previous period (comparison with the values of similar indicators indicated in the last Annual Report). In order to compare the indicators with international companies operating in a similar industry, performance indicators are published, which would enable for an industry benchmarking analysis.

* 1. The Annual Report is to be approved by the Board of Directors;
	2. The Annual Report is to be published in Kazakh, Russian and English (if necessary);
	3. The Annual Report is to be prepared and posted on the Internet resource after the approval of the annual financial statements by the Sole Shareholder;
1. Disclosure of information in the form of Annual Financial Statements
	1. The Annual Financial Statements are to be prepared annually by the Management Board and submitted to the Sole Shareholder for approval. Preliminary Annual Financial Statements are to be approved by the Board of Directors no later than thirty days before the date of its approval by the Sole Shareholder. The Company must conduct an audit of the Annual Financial Statements before submitting them to the Board of Directors for consideration.
	2. The Annual Financial Statements shall include, unless otherwise established by Law:

- Balance Sheet;

- Statement of Profit and Loss;

- Statement of Cash Flows;

- Statement of Changes in Equity;

- an Explanatory Note.

* 1. The Annual Financial Statements of the Company are to be accompanied by detailed notes that enable the reader of such statements to correctly interpret the data on the financial results of the Company's activities. The financial information is to be supplemented by comments and analytical assessments of the Company's management, as well as the Auditor's Opinion.
	2. The Annual Financial Statements are to be signed by the Chairman of the Management Board and the Chief Accountant of the Company.
	3. The Company shall provide the Annual financial statements to the authorized bodies and publish in the mass media in the manner and within the time-frames provided for by the Legislations.
1. Protection of information comprising official and trade/commercial secrets
	1. The Company shall provide equipment and resources for compliance with measures to protect confidential information in accordance with the legislation and internal regulatory documents of the Company (in the form of various computer programs, access mechanisms to premises, equipment for destroying documents, etc.).
	2. The Management Board of the Company ensures compliance with the confidentiality status in order to protect confidential information comprising official and trade/commercial secrecy protected by law to prevent possible damage from disclosure or unauthorized leakage of business information, to exclude the facts of illegal use of information by any stakeholders.
	3. The Management Board of the Company shall provide a reliable mechanism for drafting, coordination and control over the content and time-frames of disclosed information, a proper system for storing the Company's documents, functionality and safety of information resources.
	4. The protection of information comprising official and trade/commercial secrets is aimed at prohibiting the disclosure among a certain range of persons or public at large who do not have access to them, in any comprehensive form.
	5. The list of information comprising official and trade/commercial secrets is specified in Appendix 2 hereto.
	6. When carrying out trade, economic, scientific, technical, monetary, financial and other business relations, including with foreign partners, the Company provides for confidentiality conditions in the concluded contracts or signs a separate agreement specifying the nature and composition of the information comprising trade secrets, as well as mutual obligations to ensure its security in accordance with the legislation.
	7. The Chairman of the Management Board of the Company determines the need for open publication of information comprising official and trade/commercial secrets, their scope, form and time of publication.
	8. The use for open publication of information obtained on a contractual or trust basis, or resulting from joint activities, is allowed only with the general consent of the partners.
	9. The Chairman of the Management Board, Deputy Chairmen of the Management Board, managing directors, heads of structural divisions and staff of the Company who ensure the organization of work with these documents have access to information comprising official and trade/commercial secrets.

Other employees of the Company have access to information and documents comprising official and trade/commercial secrets to the extent necessary for them to perform their job duties.

* 1. An employee of the Company has access to information comprising official and trade/commercial secrets of the Company after signing a non-disclosure document (Appendix 3), which is an integral part of the employment contract. The structural unit responsible for HR management ensures the employees sign the obligation of non-disclosure of trade secrets.

An employee who, by virtue of his official duties, has access to information comprising official and trade/commercial secrets, as well as an employee to whom such information will be entrusted, must be familiar with this Information Policy. The responsibility for familiarizing these employees with the Information Policy shall be borne by their immediate superior.

* 1. Documents containing official and trade/commercial secrets of the Company are kept within the structural unit responsible for document flow control, or in structural units whose competence includes the information specified in these documents.
	2. Granting access to an employee of one structural units to information comprising official and trade/commercial secrets kept in another structural unit is carried out with the permission of the head of the latter.
	3. Employees who had been allowed access to information comprising official and trade/commercial secrets are personally responsible for compliance with the established procedure for recording, use, reproduction, storage and destruction of documents comprising comprising official and commercial secrets pursuant to the current legislation, this Information Policy and the terms of the employment contract.
	4. An employee, from the date of employment and until the expiration of five years from the date of termination of the employment contract, shall keep confidential information and information comprising official and trade/commercial secrets that have become known to him/her at work, to prevent the actions of other persons that may lead to the disclosure.
	5. Third-party employees may be allowed to familiarize themselves with and work with documents comprising official and trade/commercial secrets of the Company, provided there is an agreement and/or a confidentiality agreement between the Company and these entities, a justified written request from those entities in which they work, indicating the topic of the assignment and the surname, first name and patronymic (if any) of the employee.
	6. Employees who have access to documents comprising official and trade/commercial secrets shall:

- ensure the confidentiality of trade secrets that have become known to them whilst performing their job duties;

- comply with the requirements of the legislation, this Information Policy and other internal regulatory documents to ensure the confidentiality of trade secrets;

- in case of loss of various media containing the information comprising official and trade/commercial secrets (hard, soft copies), immediately inform the management;

- in case of termination of the employment relationship, transfer all the media of information constituting a trade secret to their immediate superior or to another specified person.

* 1. Employees who have access to documents comprising official and trade/commercial secrets shall not:

- use information comprising a trade secret when making transactions with securities (derivative financial instruments);

- provide recommendations to third parties on transactions with securities based on information comprising trade secrets;

- use trade secrets to carry out activities that may harm the Company.

* 1. In case of disclosure or illegal use of information comprising official and trade/commercial secrets, the employee bears disciplinary, civil and other liability established by law.
1. Disclosure comprising official and trade/commercial secrets, and other legally protected secret
	1. The list of information about the Company and its activities comprising official and trade/commercial secrets, and other legally protected secrets, as well as the procedure for disclosure and protection of information comprising official and trade/commercial secrets, and other legally protected secrets, are attached to this Information Policy.
	2. Generalized information that does not disclose trade/commercial data and other legally protected secrets of the Company is publicly available.
	3. The publicly available information of the Company comprises:

- name of the Company;

- name and date of incorporation of the Company;

- business identification number of the Company;

- legal address (corporate seat) of the Company;

- type of activity of the Company;

- surname, first name, patronymic of the Chairman of the Management Board.

* 1. The Company determines the range of persons who have the right of free access to information comprising trade secrets, and takes measures to protect its confidentiality.
	2. A structural unit whose competence includes issues of ensuring the secrecy treatment in the Company maintains the list of employees of the Company who have information comprising official and trade/commercial secrets.
	3. The protection of trade secrets is to prohibit the illegal receipt, distribution or use of information comprising a trade secret.
	4. The Company determines the procedure for assigning information to access categories, conditions for keeping and using information comprising a trade secret.
	5. Persons who illegally obtained, disclosed or used information comprising a trade secret shall compensate the damage caused to the Company in accordance with the Legislation.
	6. The Company has the right to require its employees to sign an agreement for non-disclosing information comprising trade secrets, and to warn persons carrying out its verification of liability in accordance with the Legislation.
1. Protection of confidential information
	1. The Company shall ensure the protection of confidential information in accordance with the requirements of the legislation of the Republic of Kazakhstan and the Company's internal documents. The conditions of access to such information, as well as the possibility of obtaining it, are determined by the Company, taking into account the need to maintain a balance between the openness of the Company and the commitment not to harm its interests;
	2. The list of documents and information comprising confidential information about the Company's activities is specified in the relevant internal document approved in line with the Charter.
	3. The Management Board of the Company shall provide a reliable mechanism for drafting, coordination and control over the content and time-frames of disclosed information, a proper system for storing the Company's documents, functionality and safety of information resources.
	4. Officials and employees of the Company shall use confidential information only in the interests of the Company and in accordance with this Information Policy, and the Company's other internal documents. The Company's counterparties shall use confidential information that has become known to them according to the legislation, other regulatory acts and agreements of the Company.
	5. To ensure the use of confidential information by the Company's officials, employees and contractors, the Company may introduce special procedures aimed at protecting confidential information from misuse. These procedures are to be introduced for:

- ensuring compliance with the procedure for the use of confidential information, including by excluding unauthorized access to confidential information and its use by officials and employees of the Company, as well as by third parties not for the benefit of the Company;

- increasing the level of trust in the Company on the part of investors, partners and other interested parties.

* 1. The Company's employees shall not to disclose confidential internal (official) information.
	2. When disclosing the information, in the case of violation of the legislation of the Republic of Kazakhstan, the Charter, this Information Policy, and internal documents of the Company, which resulted in damage to the Company, those responsible can be held accountable in accordance with the procedure established by legislation.
1. Document storage
	1. The Company shall keep the documents relating to its activities during the entire period of its activity at the location of the Company's Management Board or in another place by decision of the Company's Management Board.
	2. The following documents shall be kept:

- The Charter, amendments and additions made to the Charter;

- decisions/resolutions (minutes) of the Sole Shareholder and relevant schedules;

- the deed of incorporation (decision of the Sole Shareholder), amendments and additions made to the deed of incorporation (decision of the Sole Shareholder);

- certificate of state registration (re-registration) of the Company as a legal entity;

- licenses for the Company to engage in certain types of activities and (or) perform certain actions;

- documents confirming the Company's rights to the property that is (was) on its balance sheet;

- prospectuses of the Company's securities issue;

- documents confirming the state registration of the Company's securities issue, cancellation of securities, as well as approval of reports on the results of placement and redemption of the Company's securities submitted to the authorized body;

- regulations on branches and representative offices of the Company;

- minutes of meetings (decisions of absentee meetings) of the Board of Directors and reports (including reports declared invalid), materials on the agenda of the Board of Directors;

- minutes of meetings (decisions of absentee meetings) of the Management Board of the Company;

- orders of the Chairman of the Management Board of the Company;

- the Code.

* 1. Other documents, including the financial statements of the Company, are to be kept for a period established in accordance with the legislation of the Republic of Kazakhstan.
1. Final provisions
	1. In the event of situations not specified in the Information Policy, the Company shall be guided by the norms of the current legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Company.
	2. The Department of Creative Solutions amends this Information Policy in accordance with the internal regulatory documents of the Company.
	3. If certain items of this Information Policy as a result of amendments in the current legislation of the Republic of Kazakhstan, the Charter contradicts with them, this Information Policy is to be applied in the part that does not contradict the current legislation of the Republic of Kazakhstan and the Charter.
	4. The Company's Creative Solutions Department is responsible for the implementation of this Information Policy.

*Appendix 1*

*to the Information Policy*

*of NC "QazExpoCongress" JSC*

*Appendix 1: Information on decisions taken by the Board of Directors on the list of issues, information about which is to be brought* *to the attention of Shareholders and investors:*

1. on the issue of shares and other securities by the Joint Stock Company;
2. on cancellation of the issue of securities of the Joint Stock Company;
3. on the major transactions by the Joint Stock Company;
4. on the implementation by the Joint Stock Company of transactions that simultaneously meet the conditions as follows: are transactions in which the company has an interest and are related to the acquisition or disposal of property, the value of which is ten percent or more of the total carrying amount of the Company's assets as of the date of the decision by the authorized body of the Company to conclude such transactions;
5. on receiving by the Joint Stock Company of a loan comprising twenty-five percent or more of the amount of the equity of the Joint Stock Company;
6. on the participation of the Joint Stock Company in the establishment of legal entities or withdrawal from the membership of participants (shareholders) of legal entities by transferring (receiving) part or several parts of assets comprising from ten to twenty-five percent of all assets owned by the Joint Stock Company;
7. about the change in the list of organizations in which the Joint Stock Company has ten or more percent of shares (shares, units) in each such organization.

*Appendix 2*

*to the Information Policy*

*of NC "QazExpoCongress" JSC*

*Appendix 2: List of information about the NC "QazExpoCongress" JSC and its activities that comprise official and trade/commercial secrets protected by law*

|  |  |
| --- | --- |
|  | **Information** |
| 1. | **Information about the Sole Shareholder and its activities (except for public information about the Sole Shareholder), including information that was transmitted to the Company by the Sole Shareholder.** |
| 2. | **About the Company's securities** *(except for established by the Law of the Republic of Kazakhstan "On the Securities Market")***:**information on the availability, balances, movement and owners of equity securities and other financial instruments on client accounts in the accounting system of the Central Depository and nominal holding, except for information about the Company's shareholders and the number of shares of the Company owned by them, about the Company and the balances of equity securities on the Company's client accounts for the accounting of declared equity securities and accounting of redeemed equity securities in the nominal holding accounting system and (or) the central securities Depository Accounting System. |
| 3. | **Decisions of the Company's bodies:**Orders of the Sole Shareholder of the Company, minutes of meetings of the Board of Directors of the Company, committees under the Board of Directors and extracts from them, as well as minutes of meetings of the Management Board of the Company and extracts from them until their public disclosure. |
| 4. | **The Company's Development Plan and the Development Plan of subsidiaries and affiliates:**The Development Plan of the Company and its subsidiaries and affiliates, as well as information concerning the Company's Development Plan and the Development Plan of subsidiaries, until their public disclosure in accordance with the established procedure. |
| 5. | **The Company's Action Plan and Action Plans of subsidiaries and affiliated organizations:**The Action Plan of the Company and its subsidiaries and affiliates, as well as information contained or related to the Company's Action Plan and Development Plans of subsidiaries, until their public disclosure in accordance with the established procedure. |
| 6. | **About Business Plans:**information contained in projects or approved short- and long-term Business Plans of the Company, including expected projects, including investment projects, their goals, scope, sources of financing, descriptions of control systems of production and management processes, profitability, cash flows and cost calculations. |
| 7. | **About key and innovative ideas, solutions used in the Company's activities:**information about any ideas and solutions, including those using the achievements of science, technology, information and communication technologies that can lead to an increase in the efficiency (improvement) of production (operational) processes and performance of the Company. |
| 8. | **On key performance indicators (KPIs) of members of the Management Board and employees of the Company:**a list of key performance indicators of members of the Management Board and employees of the Company, including methods of their calculation; information on target and quantitative values of efficiency, as well as the results of their achievements. |
| 9. | **On the preparation and findings of negotiations with the Company's business partners:**information about the subject of the negotiations, about the persons participating in the negotiations and about the findings of the negotiations and agreements reached. |
| 10. | **Insider information:**any material information concerning the activities of the Company and (or) the Sole Shareholder that is not public (publicly available), determined as such in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company, the disclosure of which is delayed by the Sole Shareholder/the Company in line with its internal regulatory documents. |
| 11. | **About the risks of the Company:**information contained in the Company's risk register and risk map; information on risk mitigation measures, risk management methods, expenses related to risk management of the Company; information on risk appetite, risk limits until their public disclosure in accordance with the established procedure. |
| 12. | **On the terms and content of transactions made and being made by the Company, relevant addenda, materials on the execution of contracts**:contracts, information, documentation, correspondence arising and related to the implementation of transactions (parties, subject matter, terms, cost, execution procedure and other conditions), including those relating to any acquisition and disposal of assets, as well as any other information about the stages and results of the implementation of these transactions. |
| 13. | **About purchases, tenders, auctions, and related procedures that are not available in open sources:**information about the procurement, tenders, auctions, and procedures being prepared and carried out, including conditions, procedures, subject matter, participants in the procurement, tenders, auctions conducted by the Company; tenders (originals and copies) of potential suppliers; materials provided by potential suppliers during procurement by the method of requesting quotations; the log of registration of potential suppliers who have been provided with tender documentation; the log of registration of potential suppliers who have submitted tender bids; the log of registration of potential suppliers who have expressed a desire to participate in the procedure of opening bids with tender applications; the results of inspections (reports, certificates). |
| 14. | **About methods of calculations, the level of prices for products and the amount of discounts:**information disclosing any aspects of the Company's pricing policy, including conditions and factors affecting the pricing; internal procedures for setting (approving) tariffs, rates, prices; information concerning transfer prices, anti-dumping measures, internal monitoring of pricing; measures taken on pricing issues. |
| 15. | **About property, plant and equipment and other assets of the Company:**information about land plots, buildings, structures, equipment, vehicles, and other movable and immovable property that is owned or used by the Company, as well as information about inventory (assets) stored in warehouses until their public disclosure in line with the established procedure. |
| 16. | **The results of the Company's financial and economic activities:** until their public disclosure in line with the established procedure. |
| 17. | **About financial transactions of the NC "QazExpoCongress" JSC:**information concerning any credit, currency, banking and other financial transactions of the Company, including any information on cash flows, financing schedules, loan disbursements, made or future payments, loan agreements, guarantees; information contained in contracts providing for financial transactions. |
| 18. | **About accounting information:**any information contained in the Company's accounting documents prior to their public disclosure in accordance with the established procedure. |
| 19. | **About insurance**:information contained in insurance contracts, including types of insurance, insurers and insurance premiums until their public disclosure in accordance with the established procedure. |
| 20. | **Reports on the valuation results of the Board of Directors of the NC "QazExpoCongress" JSC, including questionnaires filled out by each member of the Board of Directors of the NC "QazExpoCongress" JSC** |
| 21. | **On the opinions of consultants on any issues that may affect the Company's business processes and decisions:**information contained in the opinions (including drafts of such opinions) provided by consultants as a result of the execution of contracts for the provision of consulting services to the Company. |
| 22. | **About tax information:**information about the results of tax audits. |
| 23. | **On the results of inspections of the Company's Internal Audit Service:**any information contained in the reports of the Company's internal auditor. |
| 24. | **About local and foreign clients, contractors, suppliers, consumers, buyers, intermediaries, customers, and other partners of the Company that are not publicly available:**information (parties, subject, terms, prices, other conditions) contained in or arising from preliminary or signed contracts with local and foreign clients, contractors, suppliers, consumers, buyers, intermediaries, customers and other partners of the Company, as well as information arising from preliminary negotiations with these entities. |
| 25. | **On confidential information of third parties transferred to the Company based on a contract:**any confidential information received by the Company in the course of fulfilling contractual obligations to third parties. |
| 26. | **About the Company's construction sites:**information contained in the feasibility studies, plans and status of design and survey activities; information contained in the design and estimate documents, on projects for the construction and arrangement of the Company's facilities, on planned and actual indicators of design and survey activities, in capital construction and capital repairs of property, plant and equipment, construction-in-progress until their public release disclosures in line with the established procedure. |
| 27. | **On occupational safety and environmental protection:**information about plans, the course of implementation, the amount of costs for occupational safety, industrial and fire safety measures; information about occupational injuries and accidents, measures taken to prevent and prevent, the amount of costs to eliminate their consequences; information about the types, time-frames and results of planned and conducted inspections by representatives of State bodies for control and prevention supervision. |
| 28. | **On the headcount and placement of the personnel of the Company and its structural divisions:**information about the staffing table, the number of employees and any information about the positions of employees of the Company and all structural divisions, branches and representative offices of the Company, as well as information about the availability of vacancies, including under contracts for the provision of paid services by individuals who are not business entities. |
| 29. | **Personal data of the Company's employees** *(except for those transferred by the Company in compliance with the requirements of the labor legislation of the Republic of Kazakhstan)*:surname, first name, patronymic of employees, date of birth, marital status, place of residence, contact information; results of certification and evaluation, other personal data. |
| 30. | **About salaries and wages, and other terms of employment contracts:**any information about the remuneration system, the procedure for determining salaries to employees of the Company, internal documents of the Company on remuneration, information on the amount of wages, compensation, remuneration and other payments in favor of employees, as well as the terms of employment contracts. |
| 31. | **Any information about the amount of remuneration and other terms of contracts for the provision of paid services by individuals who are not business entities** |
| 32. | **Any information concerning the progress of the organization and the actual state of protection of official information, commercial secrecy, and other legally protected secrets of the Company** |
| 33. | **Any information about the organization of access and in-facility status, as well as information about the placement of technical means of protection and fire safety** |

1. The Company's information comprising official and trade/commercial secrets, or other legally protected secret is provided to the Sole Shareholder of the Company upon its request, and if it is subject to mandatory public disclosure in line with the requirements of the legislation of the Republic of Kazakhstan, such information is deemed to be confidential (official information or a commercial secrecy of the Company) until the proper public disclosure.
2. Appendix 3

to the Information Policy

of NC "QazExpoCongress" JSC

*Appendix 3: Obligation of non-disclosure of trade secrets*

I, as an employee of the NC "QazExpoCongress" JSC (the "Employer" or the "Company"), during the period of employment relations with the Employer and within \_\_\_\_\_\_\_\_\_\_\_\_\_\_ years after their expiry, shall:

- not to disclose, not to transfer to third parties and not to publicly disclose information comprising the Company's trade secrets, which will be entrusted to me or will become known in the course of work;

- in the case of an attempt by unauthorized persons to obtain information from me about the Company's trade secrets, immediately inform the Company's officials about it;

- not to use the knowledge of the Employer's trade secrets to engage in any activity that could harm the Company;

- in the case of my dismissal, transfer all the trade secret storage carriers or media (documents, drafts, disks, flash drives, etc.) that were at my disposal during my employment directly to the head of my structural division and (or) officials of the Company;

- about the loss or shortage of carriers of trade secrets, as well as keys to safes, storages, metal cabinets, etc., personal seals and other facts that may lead to the disclosure of the Employer's trade secrets, as well as about the causes and conditions of possible leakage of information, immediately inform the head of my structural unit and (or) officials of the Company.

I am notified that in the case if I fail to observe the Obligation:

- I will be brought to disciplinary liability, up to dismissal from work;

- I am obliged (a) to compensate for losses caused to the Employer due to the disclosure or use for my own purposes of information comprising a trade secret, both for the duration of my employment and for a period of five years following termination of employment.

Employee's signature:

 20\_\_