Appendix No. 1 to the decision of the Board of Directors of JSC "ESC "KazakhExport" dated February 23, 2018 No. 2

Approved by the decision of the Board of Directors of JSC "ESC "KazakhExport" dated February 23, 2018 No. 2

Information Disclosure Policy of Joint-Stock Company "Export Insurance Agency of Kazakhstan"

(with amendments and additions as of May 16, 2025)

Astana

SUMMARY OF IRD

Name of IRD	Information Disclosure Policy of Joint-Stock Company "Export Insurance Agency of Kazakhstan"
IRD Owner	Compliance Service
Access Level	Publicly available
Amendments and additions made:	
In accordance with the decision of the Company's Board of Directors, amendments and additions No. 1 were made	dated November "25", 2020 (minutes No. 11)
In accordance with the decision of the Company's Board of Directors, amendments and additions No. 2 were made	dated May "16", 2025 No. 7

Содержание

Chapter 1. General Provisions

Part one of paragraph 1 was amended in accordance with the decision of the Board of Directors of JSC 'Export Credit Agency of Kazakhstan' dated May 16, 2025 No. 07

1. The Information Disclosure Policy of JSC 'Export Credit Agency of Kazakhstan' (hereinafter – the Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code, and other internal documents of JSC 'Export Credit Agency of Kazakhstan' (hereinafter – the Company) to ensure a systematic approach to information disclosure.

The Company shall disclose information on a mandatory basis in accordance with the legislation of the Republic of Kazakhstan, the Charter, and other internal documents of the Company.

paragraph 2 was amended in accordance with the decision of the Board of Directors of JSC 'ESC 'KazakhExport' dated November 25, 2020 (No. 11)

2. The Policy defines the goals and principles of information disclosure, the list of information disclosed to interested parties, the procedure and approaches to the disclosure and protection of information, types, methods, and forms of information disclosure, as well as other provisions regulating information disclosure processes.

Paragraph 3 was amended in accordance with the decision of the Board of Directors of JSC 'Export Credit Agency of Kazakhstan' dated May 16, 2025 No. 07

3. Information about the Company includes information on all material events of the Company's activities, including information on the financial position, economic indicators, ownership and management structure, plans and performance results of the Company, the Sole Shareholder of the Company, and corporate governance practices.

4. Disclosure of information about the Company means ensuring its accessibility to interested parties regardless of the purposes of obtaining this information, as well as providing information to the Sole Shareholder/state bodies/the public, and other interested parties using appropriate forms and methods of disclosure.

Chapter 2. Goals and Principles of Information Disclosure

5. The goals of disclosing information about the Company are:

1) ensuring transparency of the Company's activities and confirming the Company's unwavering readiness to follow the principles of corporate governance; bringing information about the Company to the attention of all interested parties to the extent necessary to make an informed decision on actions capable of influencing the financial and economic activities of the Company;

2) achieving the fullest implementation of the rights of the Company's Sole Shareholder to receive information essential for making investment and management decisions, as well as protecting information about the Company, the disclosure of which could cause damage to the Company and its Sole Shareholder.

6. The main principles of disclosing information about the Company are:

1) regularity and timeliness of information disclosure;

2) openness and accessibility of information;

3) reliability and completeness of information content;

4) efficiency of information disclosure;

5) balance.

7. The principle of regularity and timeliness of information disclosure means the responsibility of the Company with respect to compliance with deadlines and consistency in providing information provided for by the legislation of the Republic of Kazakhstan and internal documents of the Company. The Company realizes the importance of the regular provision of information to the Sole Shareholder, investors, state bodies, and all interested parties as a necessary condition for their understanding of the Company's activities as a whole and the production, investment, social, and other projects being implemented. Information is provided in accordance with the occurrence of an event based on its degree of significance and taking into account the timeliness of its public disclosure.

Paragraph 8 was amended in accordance with the decision of the Board of Directors of JSC 'Export Credit Agency of Kazakhstan' dated May 16, 2025 No. 07

8. The principle of openness and accessibility of information means the choice by the Company of such information distribution channels, access to which is free and unburdensome for interested parties, as well as the Company's intention to ensure maximum transparency of information about its activities, taking into account compliance with the confidentiality regime in relation to information constituting official, commercial, and other secrets protected by law.

9. The principle of reliability and completeness of information content means the responsibility of the Company in providing the Sole Shareholder and other interested parties with information that corresponds to reality and is sufficient to fully understand the disclosed fact or event. The Company ensures that the information provided is not distorted by third parties and, if such a fact is detected, takes measures to eliminate distortions and errors.

The Company does not evade disclosing negative information about itself if such information is not confidential and is capable of influencing the investment and other decisions made by interested parties.

Part three of paragraph 9 was amended in accordance with the decision of the Board of Directors of JSC 'Export Credit Agency of Kazakhstan' dated May 16, 2025 No. 07

In addition to the mandatory disclosed information, the Company may on a voluntary basis provide information on its current and planned activities, corporate social responsibility, as well as other information for a more complete understanding of the Company's activities by all interested parties.

10. The principle of efficiency means the responsibility of the Company to provide the most material information concerning particularly significant facts and events and affecting the interests of the Sole Shareholder and other interested parties, including when it is necessary for them to make appropriate decisions, in the shortest possible time.

11. The principle of balance means that the Company ensures a reasonable balance of openness and transparency, on the one hand, and confidentiality, on the other hand, in order to maximize the realization of the rights of interested parties to receive information, provided that the interests of the Company are strictly observed in terms of restricting access to confidential information constituting official, commercial, and other secrets protected by the legislation of the Republic of Kazakhstan.

Chapter 3. Company Employees Responsible for Information Disclosure

paragraph 12 was amended in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11)

12. In order for the Company to comply with the requirements of the legislation of the Republic of Kazakhstan, the Company defines employees responsible for the timely disclosure/publication of information.

The list of responsible persons and the list of information subject to disclosure shall be approved in accordance with an order of the Chairman of the Management Board of the Company.

The Company shall maintain and keep up to date the list of persons and the list of information about the Company subject to disclosure.

paragraph 13 was amended in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11)

13. Employees of the Company responsible for the timely disclosure/publication of information about the Company shall ensure the disclosure/publication of information and storage of documents of the Company, in particular:

1) ensuring compliance with the requirements for the procedure of storage and disclosure (provision) of information established by the legislation of the Republic of Kazakhstan, as well as by the Charter and internal documents of the Company;

2) ensuring the timely disclosure of information provided by employees and executives of the Company in accordance with an order of the Chairman of the Management Board of the Company.

paragraph 14 is presented in the wording of the paragraph in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

14. Monitoring over the timely submission of external reports, as well as information on corporate events of the Company, shall be carried out by the Compliance Service in accordance with an order of the Chairman of the Management Board of the Company.

Supplemented with paragraph 14-1 according to the amendments and additions approved by the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11); An addition was made to paragraph 14-1 in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

14-1. Monitoring over the timely placement and updating of information on the activities of the Company in the media, as well as on the corporate Internet resource, shall be carried out in the manner prescribed by the internal regulatory documents of the Company.

15. The Company shall ensure the maintenance of a list of employees and officers of the Company who possess information constituting confidential information (official, commercial, and other secrets protected by the legislation of the Republic of Kazakhstan).

Chapter 4. Types and Forms of Information Disclosure

16. Disclosed information about the Company is divided into the following types:

1) publicly available information disclosed to all interested parties;

Publicly available information is recognized as information that does not relate to details constituting confidential information (official, commercial, or other secrets protected by the legislation of the Republic of Kazakhstan), as well as information subject to mandatory public disclosure.

2) information subject to disclosure to the Sole Shareholder of the Company, investors, and state bodies;

3) confidential information (official, commercial, and other secrets protected by the legislation of the Republic of Kazakhstan).

Paragraph 17 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

17. The Company is obliged to provide interested parties, regardless of the purpose of obtaining it, with the publicly available information specified in this Policy, in the manner and within the time limits prescribed by the legislation of the Republic of Kazakhstan.

Amendments were made to paragraph 18 in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

18. In the case of an inquiry from media representatives, the Company is obliged to submit the requested information in the manner and within the time limits prescribed by the legislation of the Republic of Kazakhstan on mass media.

19. In electronic form, documents and information are placed in the state, Russian, and English languages on the Internet resources of the Company and the financial statements depository. In written form, information (documents) is provided by the Company on the basis of a request. At the same time, information (documents) is provided by the Company in one of the following languages: in the state and/or Russian, and/or English languages.

20. When disclosing information, the Company uses the following forms:

1) a written document, including responses to requests, publications (messages) in the mass media, brochures, reports on the activities of the Company, materials for employees of the Company;

2) an oral communication, including interviews, press conferences, speeches at meetings and public events inside and outside the office of the Company;

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

4) materials transmitted on electronic media, including email, discs, USB devices, and other media.

21. The person authorized to disclose information on behalf of the Company is the Chairman of the Management Board of the Company or another executive of the Company authorized by him.

22. The Chairman of the Management Board of the Company has the right to authorize employees of the Company to speak on behalf of the Company or to prepare and send responses to specific requests.

Amendments were made to paragraph 23 in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

23. The Company has the right to organize, as necessary, briefings (press conferences) in connection with the publication of regular financial statements, decisions of the Sole Shareholder of the Company, and other significant corporate events.

amendments were made to paragraph 24 in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11);

24. The Company discloses the following publicly available information on the Internet resource of the Company:

1) the Charter of the Company, amendments and additions thereto;

2) the Corporate Governance Code;

3) the Regulations on the Board of Directors;

Amendments were made to sub-paragraphs 4) and 5) in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

4) the Information Disclosure Policy;

5) the Development Plan;

6) annual financial statements of the Company and the auditors' report on these statements, as well as quarterly financial statements;

Amendments were made to sub-paragraphs 7) and 8) in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

7) on the members of the Board of Directors, including the following information: photograph (as agreed with the member of the Board of Directors of the Company), surname, first name, patronymic (if any), date of birth, citizenship, status of the member of the Board of Directors (independent director, representative of the Sole Shareholder), indication of the functions of the member of the Board of Directors, including membership in committees of the Board of Directors or execution of the functions of the Chairman of the Board of Directors, education, including basic and additional education (name of the educational institution, year of graduation, qualification, degree obtained), work experience for the last five years, main place of work and other positions currently held, professional qualification, date of first election to the Board of Directors and date of election to the current Board of Directors, number and share of owned shares of affiliated organizations;

8) on the members of the Management Board, including the following information: photograph (as agreed with the member of the Management Board of the Company), surname, first name, patronymic (if any), date of birth, citizenship, position and functions performed, education, including basic and additional education (name of the educational institution, year of graduation, qualification, degree obtained), work experience for the last five years, professional qualification, positions held concurrently, number and share of owned shares of affiliated organizations;

9) on the external auditor;

10) on the annual calendar of corporate events;

11) on interested-party transactions, including information on the parties to the transaction, material terms of the transaction (subject of the transaction, transaction price), and the body that made the decision to approve the transaction;

12) on major transactions, including information on the parties to the transaction, material terms of the transaction (subject of the transaction, transaction price), and the body that made the decision to approve the transaction;

13) on the amounts of insurance tariffs by classes of insurance;

14) news and press releases;

15) credit and other ratings assigned to the Company;

16) the organizational structure of the Company;

17) contact information;

18) information on the decisions of the Sole Shareholder related to corporate events in accordance with the legislation of the Republic of Kazakhstan;

19) information on the decisions of the Board of Directors for the year;

21) other information in accordance with the legislation of the Republic of Kazakhstan, the Charter, internal documents of the Company, by decision of the Sole Shareholder, the Board of Directors, and the Chairman of the Management Board of the Company.

Chapter 5. Information Subject to Disclosure to the Sole Shareholder and Investors of the Company

25. To protect the rights and interests of the Sole Shareholder and investors, the Company ensures access to information about the Company in the manner prescribed by the legislation of the Republic of Kazakhstan, the Charter, and internal regulatory documents of the Company.

26. The Sole Shareholder shall be provided with the following information, including, but not limited to:

1) information on corporate events of the Company in accordance with the legislation of the Republic of Kazakhstan and the Charter of the Company;

2) other information in accordance with the Charter of the Company, the legislation of the Republic of Kazakhstan, and decisions of the Sole Shareholder and the Board of Directors of the Company.

27. The provision of information on corporate events and information affecting the interests of the Sole Shareholder shall be carried out in accordance with the legislation of the Republic of Kazakhstan, the Charter, and other internal documents of the Company.

28. The Company shall provide the Sole Shareholder, upon their written request, with information in accordance with the legislation of the Republic of Kazakhstan and the Charter of the Company.

29. Information requested by the Sole Shareholder shall be provided taking into account the provisions of the internal documents of the Company.

30. No fee shall be charged for making copies of documents to be presented to the Sole Shareholder, except in cases established by the legislation of the Republic of Kazakhstan.

Chapter 6. Confidential Information

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

32. The Management Board of the Company shall ensure compliance with the confidentiality regime in order to protect confidential information, official, commercial, and other secrets protected by law, prevent potential damage from disclosure or unauthorized leakage of business information, and exclude instances of unlawful use of this information by any interested parties.

33. The Management Board of the Company shall ensure a reliable mechanism for the preparation, approval, and monitoring of the content and timing of disclosed information, a proper system for the storage of the Company's documents, and the functionality and preservation of information resources.

Paragraph 34 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

34. The procedure for working with documents and data containing confidential information is established by an internal document of the Company. Information that is confidential is specified in the List of Confidential Data (Information) approved by a decision of the Board of Directors of the Company.

35. Data constituting an insurance secret and other secrets protected by law may be disclosed only on the grounds and in the manner defined by the legislation of the Republic of Kazakhstan.

36. The preservation of confidential information and secrets protected by law is the duty of all employees of the Company.

37. In case of violation of paragraph 35 of this Policy, resulting in material damage and reputational risks, the persons guilty of such violation shall be held liable in the manner established by the legislation of the Republic of Kazakhstan.

Paragraph 38 is presented in the wording according to the amendments and additions approved by the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11); Amendments were made to paragraph 38 in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

38. Monitoring over the transfer of confidential information shall be carried out in the manner prescribed by the internal documents of the Company.

Chapter 7. Methods of Information Disclosure

39. Disclosure of information about the Company is carried out by the Company in the following ways:

1) provision of information (documents) at the location of the Management Board of the Company;
2) provision of information (documents) upon request of interested parties, the Sole Shareholder of the Company, investors, and state bodies;
3) sending information (documents) to state bodies on the grounds and in the manner prescribed by the legislation of the Republic of Kazakhstan;
4) placement of information (documents) on the Internet resource of the Company and on the official pages of the Company on social networks;
5) placement on the Internet resource of the financial statements depository determined in accordance with the legislation of the Republic of Kazakhstan;

Sub-paragraph 6) was amended in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

6) publication in the mass media determined by the Charter of the Company;
7) distribution of information through the organization of briefings, press conferences, and meetings with the mass media;
8) by other ways prescribed by the legislation of the Republic of Kazakhstan, the Charter, and internal documents of the Company.

Paragraph 40 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

40. Placement of information on the Internet resource of the Company is carried out in three languages (state, Russian, and English). The text of the placed information in the state, Russian, and English languages must be authentic.

41. Excluded in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

42. *Excluded in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07*

Paragraph 43 is presented in the wording according to the amendments and additions approved by the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11)

43. Information prepared for placement on printing materials must be agreed upon with the supervising heads of the interested structural subdivisions of the Company, as well as, if necessary, with the Chairman of the Management Board of the Company.

an addition was made to paragraph 44 in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated November 25, 2020 (No. 11);

44. The Company publishes press releases, articles, interviews, and other information in other mass media distributed within and outside the territory of the Republic of Kazakhstan as the need arises in the manner prescribed by internal documents.

Official press releases of the Company must be agreed upon with the Chairman of the Management Board of the Company or the person substituting for him, as well as with the press service of the Sole Shareholder, before publication.

In case of necessity, the structural subdivision responsible for information and communication of the Company has the right to contact the Compliance Service and (or) the structural subdivision responsible for legal support of the Company and (or) information security in the Company to obtain clarifications regarding the compliance of the text of the prepared press release with the requirements of the internal documents of the Company and the legislation of the Republic of Kazakhstan on ensuring the safety of data that is confidential.

45. In accordance with the principles of information disclosure, the Company maintains an active dialogue with representatives of the mass media through a number of activities, including:

1) distribution of press releases on all material events in the life of the Company;
2) holding press conferences and meetings of mass media representatives with the management of the Company;
3) prompt and competent responses to all information requests from mass media representatives received by the Company;
4) participation in conferences, seminars, and other public events.

Paragraph 46 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

46. Publications of an advertising and informational nature (interviews, reports, articles) prepared for distribution in the mass media by the structural subdivision responsible for information and communication of the Company must be submitted for preliminary agreement to the head of the corresponding structural subdivision whose activities will be mentioned in this publication, as well as to the supervising head of this structural subdivision.

47. Placement of advertising is carried out in accordance with the legislation of the Republic of Kazakhstan.

Paragraph 48 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

48. Coordination of work with the mass media is carried out by the structural subdivision responsible for information and communication of the Company.

Paragraph 49 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

49. All employees of the Company are obliged to assist the structural subdivision responsible for information and communication of the Company in obtaining the necessary information within the scope of their powers within the time limits and in the manner prescribed by the internal documents of the Company.

Paragraph 50 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

50. Information exchange with the mass media is carried out by the structural subdivision responsible for information and communication of the Company, which is responsible for processing, distributing, and coordinating requests from the mass media.

51. Upon receipt of a request from the mass media, the responsible subdivision or employee of the Company, having agreed on the topic of the request with their supervising head, and in the case of a particularly significant request capable of affecting the image of the Company - also with the Chairman of the Management Board, forms a response. To prepare the response, if necessary, the corresponding subdivisions of the Company may be involved.

Paragraph 52 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

52. Any interaction with the mass media on matters of the Company's activities without the permission of the Chairman of the Management Board or the supervising head of the Company is prohibited for all employees, with the exception of officers and employees of the structural subdivision responsible for information and communication of the Company.

53. Employees of the Company who interact with the mass media must comply with the Code of Business Ethics of the Company.

Paragraph 54 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

54. Employees of the Company are prohibited from commenting on any requests or questions concerning unconfirmed information published in electronic and printed editions, on social networks, and Internet blogs. Commenting on unconfirmed information may be carried out by the structural

subdivision responsible for information and communication of the Company after preliminary agreement with the supervising head.

55. Excluded in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

Paragraph 56 is presented in the wording in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

56. The structural subdivision responsible for information and communication of the Company carries out regular monitoring of electronic and printed mass media, as well as social networks. Upon detection of negative information regarding the activities of the Company and (or) its employees, officers, the structural subdivision responsible for information and communication of the Company, within a period not later than one working day, notifies the supervising head, the structural subdivision for risk management of the Company, and the Compliance Service.

Chapter 8. Final Provisions

57. The norms of this Policy are mandatory for execution by all employees of the Company. For violation of the requirements of this Policy, employees of the Company bear liability established by the legislation of the Republic of Kazakhstan.

58. In the event of a change in the legislation of the Republic of Kazakhstan or the Charter of the Company, the norms of this Policy shall apply to the extent that does not contradict the legislation of the Republic of Kazakhstan and the Charter of the Company.

Supplemented with paragraph 59 in accordance with the decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated May 16, 2025 No. 07

59. Issues not regulated by this Policy shall be resolved in the manner defined by the legislation of the Republic of Kazakhstan.