

Approved
by the decision
of the Management Board
of "National Company"
"Kazakhstan Temir Zholy"
Joint Stock Company
Dated October 24, 2018
(Minutes No 7)

**Information policy
of "National Company "Kazakhstan Temir Zholy"
Joint Stock Company**

1. GENERAL PROVISIONS

The information policy of the "National Company "Kazakhstan Temir Zholy" Joint Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the legislation of the Republic of Kazakhstan, corporate governance of the "National Company "Kazakhstan Temir Zholy" Joint Stock Company, approved by the decision of the Management Board of "Samruk-Kazyna" JSC dated May 27, 2015 (minutes No. 22/15), the Charter of NC KTZ JSC and international corporate governance practice.

1. The Policy is an internal document of "National Company "Kazakhstan Temir Zholy" Joint Stock Company (hereinafter referred to as the Company) and defines the basic principles of disclosure of information on the activities of the Company to the Sole Shareholder of the Company and other interested parties.

2. The Policy does not regulate relations related to the handling of information constituting state secrets.

3. An integral part of the Policy is information security, which is ensured by the implementation of the following tasks:

ensuring the integrity of the Company's information assets in order to support high quality business processes;

ensuring continuous availability of the Company's information assets to support its business processes;

ensuring the confidentiality of information of the Company and other interested parties when working with information technologies.

4. Relations related to ensuring the information security of the Company are regulated by the Information Security Policy of the Company, approved by a decision of the Management Board of the Company.

5. The Policy of the Company is aimed at the most complete satisfaction of the information needs of the Sole Shareholder of the Company and other interested

parties for reliable information about the Company, its activities and ensuring the possibility of free and unobtrusive access to this information.

6. The Company ensures the preparation and dissemination of information in compliance with the Rules for ensuring the safety of the Company's commercial secret and confidential information, approved by a separate local act of the Company.

7. The PR Department (hereinafter referred to as the Department) is responsible for the preparation and provision of information to the Mass media about the activities of the Company, as well as the structural divisions responsible for the provision and placement of information on the Internet resources of authorized bodies, in accordance with the requirements of the legislation of the Republic of Kazakhstan and local acts of the Company.

The Department develops and implements a Media plan and other documents related to corporate communications.

2. CONCEPTS AND TERMS

8. The following concepts and terms are used in this Policy:

interested parties - individuals or legal entities, in one way or another interested in the activities of the Company: Sole shareholder, investors; partners, representatives of the Mass media, government agencies, the public and others;

commercial secret - information defined and protected by the Company, to which a limited circle of persons has free access on a legal basis, the disclosure, receipt, or use of which may cause damage to its interests.

confidential information - information with limited access, containing information about the activities of the Company, as well as any other information belonging to the Company that does not have actual or potential commercial value;

Company's bodies - the Sole Shareholder, the Board of Directors, the Management Board of the Company, the Internal Audit Service;

providing comments - providing responses to oral and written inquiries from Mass media representatives;

disclosure of information - ensuring the availability of information to all interested parties, regardless of the purpose of obtaining this information in the manner, by the methods and in the forms established by the legislation of the Republic of Kazakhstan, the Charter of the Company, the Corporate Governance Code of the Company, and the internal documents of the Company;

corporate events - events that have a significant impact on the activities of the Company, affecting the interests of the Sole Shareholder and investors of the Company;

mass media - a periodical printed publication, television or radio channel, documentary film, audiovisual recording and other form of periodic or continuous public dissemination of mass information, including internet resources;

official - member of the Board of Directors, member of the Management Board of the Company;

public speeches - speeches by the head of the Company and (or) authorized persons at public events: conferences, forums, seminars, telephone and video conferences and other events in which representatives of the mass media may participate;

corporate website - a group of electronic documents (pages) linked by a common name, subject matter and navigation system, prepared using specialized technical means and software for the purpose of disseminating information about the Company's activities on the internet;

3. PRINCIPLES OF INFORMATION DISCLOSURE

9. The main principles of disclosure of information are:

efficiency - informing the Sole Shareholder and other interested parties about the most important events and facts about the Company's activities in the shortest possible time;

transparency - disclosure of complete and reliable information to the Sole Shareholder and other interested parties;

accessibility - the use by the Company of information distribution channels that ensure free, convenient and optimal access of the Sole Shareholder and other interested parties to the disclosed information;

balance - ensuring by the Company a reasonable balance between the disclosure of information, on the one hand, and its safety, on the other, in order to implement the rights of interested parties to receive information and to observe the interests of the Company;

consistency - information disclosed by the Company must be consistent with previously disclosed information.

4. METHODS OF DISCLOSURE OF INFORMATION

10. Disclosure of information about the Company and its activities is carried out by disseminating information in the following ways:

1) posting information on the corporate website www.railways.kz, the Company's accounts in social networks;

- 2) posting information in accordance with the established procedure on the internet resources of the financial reporting depository and the stock exchange;
- 3) provision of information to the Sole Shareholder upon its requests;
- 4) publication of information in Kazakhstani and Foreign Mass media;
- 5) informing the Mass media during public speeches by representatives of the Company, preparation and distribution of press releases to the Mass media;
- 6) holding press conferences, press tours, briefings, seminars, meetings, etc. with the participation of representatives of the Company and other interested parties;
- 7) publication of information in brochures and booklets;
- 8) вручение (пересылка) информации (документов) на бумажных носителях;
- 8) delivery (transfer) of information (documents) in printed form on paper;
- 9) other methods in accordance with the legislation of the Republic of Kazakhstan.

5. INFORMATION DISCLOSURE PROCEDURE

11. The information that must be disclosed is determined by the following standards:

- the legislation of the Republic of Kazakhstan, in particular, the Law of the Republic of Kazakhstan "About Joint Stock Companies" dated May 13, 2003, the Law of the Republic of Kazakhstan "About Access to Information" dated November 16, 2015, the Law of the Republic of Kazakhstan "On Mass Media" dated July 23, 1999, the Law of the Republic of Kazakhstan "On the Securities Market" dated July 2, 2003, the Resolution of the Management Board of the National Bank of the Republic of Kazakhstan dated January 28, 2016 No 26 "On Approval of the Rules for Posting on the Reporting, Internet Resources of the Depository of the Financial Stock Exchange, Information on Corporate Events, Financial Statements and Audit Reports, Lists of Affiliates of Joint Stock Companies, as well as Information on the Total Amount of Remuneration of Members of the Executive Body Based on the Results of the Year";

- the Charter of the Company;
- Code of Corporate Governance of the Company;
- internal documents of the Company.

12. The Company discloses information about its activities as the need for such publication arises.

13. Information of about important facts (events, actions) affecting the financial and economic activities of the Company, which may have a significant impact on the financial condition of the Company, as well as other information, the

obligation to disclose which arises for the Company in accordance with the legislation of the Republic of Kazakhstan, shall be published from the moment of the occurrence of the relevant event, unless other terms and forms of public dissemination of information are established by the Charter of the Company, this Policy, other internal documents of the Company and the legislation of the Republic of Kazakhstan.

6. DISCLOSURE OF INFORMATION BY THE COMPANY

14. The Company must inform the Sole Shareholder of investors about the following corporate events of the Company:

- 1) decisions taken by the general meeting of shareholders;
- 2) information on any forms and conditions of cooperation, agreements, partnerships with the Government and state bodies;
- 3) the annual report, which also includes the report of the board of directors and the audited annual financial statements;
- 4) the issue by the Company of shares and other securities and the approval by the authorized body of reports on the results of the placement of the Company's securities, reports on the results of the redemption of the Company's securities, the cancellation by the authorized body of the Company's securities;
- 5) the conclusion by the Company of major transactions and transactions that simultaneously meet the following conditions: they are transactions in the conclusion of which the Company has an interest and are related to the acquisition or alienation of property, the value of which is ten percent or more of the total book value of the Company's assets on the date of the decision by the Company's authorized body to conclude such transactions.
- 6) information about a transaction resulting in the acquisition or alienation of property worth ten percent or more of the size of the Company must include information about the parties to the transaction, the assets acquired or alienated, the terms and conditions of the transaction, the nature and volume of the shares of the persons involved, and, if any, other information about the transaction;
- 7) transfer of collateral (re-pledging) of the Company's property in an amount equal to five or more percent of the assets of the given company;
- 8) receipt by the Company of a loan in an amount equal to twenty-five percent or more of the size of the Company's equity capital;
- 9) receipt by the Company of permits to carry out any types of activities, suspension or termination of permits previously received by the Company to carry out any types of activities;
- 10) participation of the Company in the establishment of a legal entity;

11) other events affecting the interests of the Sole Shareholder of the Company and investors, in accordance with the Charter of the Company, as well as the prospectus for the issue of securities of the company.

12) other issues in accordance with the legislation of the Republic of Kazakhstan.

15. The procedure and timeframes for communicating information on corporate events are determined in accordance with the Law of the Republic of Kazakhstan “About Joint Stock Companies” of May 2003, the Law of the Republic of Kazakhstan “About the Securities Market” of July 2, 2003 and the Corporate Governance Code of the Company, the Charter and local acts of the Company.

7. PROCEDURE FOR DISCLOSURE OF INFORMATION BY REPRESENTATIVES OF THE COMPANY

16. The Chairman of the Board of Directors of the Company has the right to comment on decisions taken by the Board of Directors, as well as to express the 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 of commercial secret and confidential information of the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan and the internal documents of the Company.

17. Members of the Board of Directors and its committees have the right to publicly express their point of view on issues considered at meetings of the Board of Directors (committees), as well as on decisions taken at meetings of the Board of Directors of the Company (committees), taking into account compliance with the requirements of commercial secret and confidential information of the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan and the internal documents of the Company.

18. Members of the Management Board and other employees of the Company may make public speeches on issues related to the activities of the Company within the scope of their competence, subject to mandatory prior notification of the Department.

19. Public statements by members of the Management Board and employees of the Company regarding the Company and organizations included in the Company group must comply with this Policy and other internal documents of the Company.

8. PROTECTION OF COMMERCIAL SECRET AND CONFIDENTIAL INFORMATION

20. The Company ensures the protection of the commercial secret of the confidential information of the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan and the internal documents of the Company. 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 desire not to harm its interests.

21. The list of information constituting a commercial secret and confidential information of the Company is determined by the relevant internal document approved by the decision of the Management Board of the Company.

22. Officials and employees of the Company are obliged to use information constituting a commercial secret and confidential information only in the interests of the Company and in accordance with this Policy and other internal documents of the Company. The Company's counterparties are obliged to use information that has become known to them constituting a commercial secret and confidential information in accordance with the legislation, other regulatory acts and agreements of the Company.

23. In order to ensure that officials, employees and contractors of the Company comply with the procedure for using information constituting a commercial secret and confidential information, the Company has the right introduce special procedures aimed at protecting them from unauthorized use.

The specified procedures are introduced to: ensure compliance with the procedure for using information constituting a commercial secret and confidential information of the Company, including by eliminating unauthorized access to confidential information and its use by officials and employees of the Company and third parties not in the interests of the Company;

increasing the level of trust in the Company on the part of the sole shareholder, investors and partners.

24. In the event of a violation of the legislation of the Republic of Kazakhstan, the Charter, this Policy and other internal documents of the Company during the process of disclosure of information, which resulted in damage to the Company, the guilty persons may be held liable in the manner established by the legislation of the Republic of Kazakhstan.

9. FINAL PROVISIONS

25. In order to control the quality of the information disclosed by the Company, it is necessary to annually submit to the Board of Directors of NC KTZ JSC an information report on the effectiveness of information disclosure processes.

26. Issues not regulated by this Policy are regulated by the legislation of the Republic of Kazakhstan, the Charter of the Company, decisions of the Sole Shareholder, the Board of Directors of the Company adopted in accordance with the established procedure.

27. If individual points of this Policy, as a result of changes in the legislation of the Republic of Kazakhstan and the Charter of the Company, conflict with them, this Policy shall be applied to the extent that it does not conflict with the legislation of the Republic of Kazakhstan and the Charter of the Company.
