



Kcell Insider Information Policy

Security: Public

Creator
Alexandra Kuznetsova

Date
2013 December 02

Page No. **Version**
1 (2) 1

Approved by
Kcell Board of Directors

Kcell JSC Insider Information Policy

1. General

This Insider Information Policy of Kcell JSC (the Policy) has been developed in accordance with the Law of the Republic of Kazakhstan On Securities Market (the Law), Law of the Republic of Kazakhstan On Joint Stock Companies, Charter of Kcell JSC, as well as applicable laws of the Republic of Kazakhstan in order to further improve good corporate governance practices of Kcell JSC and bring them in line with international standards. On the effective date of this Policy, the Insider Information Policy of Kcell JSC of December 11, 2012 approved by the Board of Directors of Kcell JSC on December 11, 2012 shall cease to have effect.

The major goals of this Policy are to prevent and suppress misuse of insider information of Kcell JSC (the Company).

This Policy is complemented by Insider Trading Policy of Kcell JSC setting additional trading and disclosure restrictions applicable to employees and senior management of Kcell JSC.

2. Insider information

In this Policy, the term “insider information” refers to information on the Company and its activity, securities and securities transactions of the Company, which constitutes its commercial secret, as well as any other information which is not publicly available and disclosure of which may affect the share price and business of the Company as an issuer thereof.

Insider – is someone who has access to insider information.

The Company insiders are physical persons and entities who have access / a right of access to insider information of the Company, including:

- members of the Board of Directors;
- Chief Executive Officer;
- Department Directors;
- Company employees who are granted access to insider information on a “need to know” basis;
- auditors, independent appraisers, consultants, contractors under existing and/or planned contracts of the Company, and their authorized persons, working with the Company, where they have access to the Company’s insider information;
- other persons who may have access to insider information of the Company, including by obtaining such information from any of the parties specified herein.



Kcell Insider Information Policy

Security: Public

Creator
Alexandra Kuznetsova

Date
2013 December 02

Page No. **Version**
2 (2) 1

Approved by
Kcell Board of Directors

The Company shall maintain a list of insiders who have access to insider information, regardless of whether such access is granted on a permanent or temporary basis.

Procedure for maintaining and updating the list of insiders is determined in accordance with the Company's internal documents in place.

3. Insiders Obligations

Insiders may not:

- 1) use insider information for the purpose of transactions involving securities (derivative financial instruments);
- 2) transfer or make available to third parties insider information, except as provided under the laws of the Republic of Kazakhstan;
- 3) give advice to third parties with respect to securities transactions based on insider information.

4. Liability

Insiders failing to comply with the insider obligations shall bear personal liability stipulated by the laws of the Republic of Kazakhstan and/or laws of the country where transaction(s) involving the Company's securities was (were) executed.

Except as provided in this Policy, the laws of the Republic of Kazakhstan and internal policies and procedures of the Company shall apply.

This Policy shall come into force upon being approved by the Board of Directors of the Company.