REGULATION ON THE INFORMATION POLICY OF JSC "ALOQABANK"

Regulation on the Information Policy

I. GENERAL PROVISIONS	3
II. INFORMATION DISCLOSURE OBJECTIVES AND PRINCIPLES	3
III. PERSONS AUTHORIZED TO DISCLOSE INFORMATION ON BEHALF OF THE BANK	4
IV. INFORMATION DISCLOSURE RULES	4
V. PUBLIC INFORMATION	6
VI. INFORMATION EXCHANGE BETWEEN MANAGEMENT, EXECUTIVES, EMPLOYEES AND STAKEHOLDERS	7
VII. COMMERCIAL SECRET	7
VIII. INFORMATION PROVIDED TO THE BANK	8
IX. FINAL PROVISIONS	8
APPENDIX (List of confidential documents and information)	9

I. GENERAL PROVISIONS

- 1.1. This Regulation on the Information Policy (hereinafter, the "Regulation" or "Information Policy") of JSC "Aloqabank" (hereinafter, the "Bank") regulates the disclosure of information by the Bank about the Bank and its activity, including key objectives and principles of such disclosure, defines the information for disclosure, the disclosure procedure and actions to observe the compliance with the Bank's information policy.
- 1.2. The Regulation is developed in accordance with legislation of the Republic of Uzbekistan, recommendations of the Corporate Governance Code, the Charter and other internal documents of the Bank.
- 1.3. For the purposes of this Regulation, the information policy refers to the aggregate of principles and procedures the Bank follows when disclosing the information.
- 1.4. The Regulation is approved by the Supervisory Board of the Bank (hereinafter, the "Board").

II. INFORMATION DISCLOSURE OBJECTIVES AND PRINCIPLES

- 2.1. The objective of information disclosure lies in its presentation to shareholders, investors, professional participants of the securities market and other stakeholders (hereinafter, "stakeholders") to the extent necessary to take any informed decisions or to perform any actions.
- 2.2. The Bank discloses the information based on the principles of reliability, availability, promptness, equal rights, protection, completeness, regularity and a reasonable balance between the Bank's transparency and safeguarding its commercial interests.
- 2.3. The reliability principle means that the information has no significant errors and accurately reflects the Bank's operations.
- 2.4. The availability principle means that communication channels used by the Bank allow free, easy and wide-open access of all stakeholders to the information.
- 2.5. The promptness principle means that the Bank promptly informs its stakeholders of any material events and facts affecting the Bank's operations and its stakeholders' interests.
- 2.6. The principle of equal rights means that the Bank grants equal rights to all its stakeholders in getting access to the information about the Bank's operations.
- 2.7. The principle of protection means that the Bank uses the methods and safeguards permitted by legislation to keep the information constituting commercial or other secret or confidential information protected.
- 2.8. The principle of completeness means that the Bank provides the relevant and trustworthy information to all its stakeholders and does not deviate from disclosing any unfavorable information to the extent reasonably practicable to ensure a broad vision of the Bank and its performance.
- 2.9. The regularity principle means that the Bank provides the information on its operations to all stakeholders on a regular basis.
- 2.10. The principle of balance means that the Bank keeps a reasonable balance between its transparency and safeguarding its commercial interests. However, the Bank is responsible for keeping confidential information protected at all times and observing the rules for use and distribution of the insider information established by effective legislation and the internal regulations of the Bank.

III. PERSONS AUTHORIZED TO DISCLOSE INFORMATION ON BEHALF OF THE BANK

- 3.1. The following executives of the Bank (hereinafter, the "authorized persons") are entitled to communicate the information to stakeholders (investors, community, mass media, public authorities, etc.):
 - 3.1.1. Chairman of the Management Board;
 - 3.1.2. Deputy Chairman of the Management Board responsible for information disclosure;
 - 3.1.3. Corporate counselor;
 - 3.1.4. Chairman of the Bank's Board.
- 3.2. To pursue unified and consistent information policy in exceptional cases the authorized persons may delegate their powers to give official comments on behalf of the Bank to other persons. Persons other than authorized persons of the Bank are not entitled to give official comments on the Bank's activities without prior special directive of the authorized person.
- 3.3. All public appearance of authorized persons that may impact the operations of the Bank and/or price of its securities should be arranged with the Bank's corporate counselor.
- 3.4. If any employee of the Bank participates in any event while performing his/her job or other duties, such employee should provide the information on the Bank in compliance with the Bank's Information Policy and upon prior approval of the authorized person.
- 3.5. The authorized persons should have the exhaustive information on the Bank's activities that may be of certain interest to business community. The activity of the authorized persons are directed, coordinated and controlled by the Chairman of the Bank's Management Board.
- 3.6. The management presents a report to the Bank's Board on the compliance with this Regulation at least annually.

IV. INFORMATION DISCLOSURE RULES

- 4.1. The Bank's Board together with the Chairman of the Management Board and other authorized persons develops, periodically reviews and continuously improves the Bank's Information Policy.
- 4.2. The Chairman of the Management Board is responsible for organization and timeliness of the information and reports provided to relevant public authorities, the extent and accuracy of such information and reports as well as for communications with shareholders, creditors, other stakeholders and mass media.
- 4.3. The corporate counselor of the Bank upon authorization of the Chairman of the Management Board:
 - 4.3.1. controls the timeliness of disclosing the information contained in the Bank's offering memorandums, quarterly and annual reports as well as the information on material facts in the Bank's activity;
 - 4.3.2. keeps the documents, which are subject to mandatory storage, grants access to the documents and distributes copies of such documents to stakeholders. Copies of the documents should be certified by the Bank's corporate counselor.
- 4.4. The Bank follows the information policy pursuant to applicable legislation and to the benefit of the Bank and its shareholders.
- 4.5. The Bank strives to make the disclosed information as open to stakeholders as possible.
- 4.6. The Chairman of the Management Board and other authorized persons shall have the exhaustive information on any activity of the Bank subject to disclosure in order to:

- 4.6.1. define whether such information is subject to disclosure, level of its materiality and whether it may be disclosed or should be kept confidential;
- 4.6.2. be aware of all aspects of the Bank's current operations which are of interest to investors;
- 4.6.3. exclude situations when the occurrence of particular events is contradicted despite such fact exists.
- 4.7. The Bank prepares and discloses the information subject to mandatory disclosure within the scope, time-limits and by methods defined by laws of the Republic of Uzbekistan "On Joint Stock Companies and Protection of Shareholders' Rights", "On Securities Market", resolutions of the Cabinet of Ministers No.176 dated 02 July 2014 "On Continued Improvement of the Corporate Governance in Joint Stock Companies" and No.355 dated 31 December 2013 "On Implementation of the System for Evaluation of Information and Communication Technologies in the Republic of Uzbekistan", Rules for Disclosure and Publishing Information in the Securities Market (reg. No.2383 dated 31 July 2012) and other regulations.
- 4.8. In addition to the information which is disclosed under the legislation, the Bank prepares and discloses the following information:
 - 4.8.1. significant information on objectives of the Bank's activity;
 - 4.8.2. organizational and governance structure of the Bank;
 - 4.8.3. internal policies of the Bank (including the code or policy on corporate governance and procedures for their implementation);
 - 4.8.4. Information on majority shareholders of the Bank;
 - 4.8.5. information on voting rights and related party transactions;
 - 4.8.6. compensation and remuneration policies;
 - 4.8.7. key indicators reflecting long-term performance of the Bank;
 - 4.8.8. key provisions regarding the Bank's exposure to risks and risk management strategy (excluding confidential information).
- 4.9. All communication channels shall make the information easily accessible for stakeholders. The information may be disclosed as follows:
 - 4.9.1. publications on a unified corporate information portal (official website of an authorized public securities regulatory body);
 - 4.9.2. publications in mass media;
 - 4.9.3. publications on website of the stock exchange;
 - 4.9.4. publications on the Bank's website:
 - 4.9.5. press conferences, briefings and meetings with the shareholders, investors, analysts, mass media representatives and other stakeholders;
 - 4.9.6. distribution of the information to the Bank's shareholders;
 - 4.9.7. granting access to the information and documents to the Bank's shareholders and distribution of copies of such documents upon request in cases specified by the effective legislation of the Republic of Uzbekistan, the Bank's Charter and other internal documents. Fees for provision of copies of the documents cannot exceed costs for copying;
 - 4.9.8. other methods of disclosure envisaged by the effective legislation of the Republic of Uzbekistan, regulatory authorities, the Bank's Charter and other internal documents.
- 4.10. The Bank publishes all most significant communications and materials on its website. In particular, the Bank's website contains the following information:
 - 4.10.1. Charter and amendments to it;
 - 4.10.2. annual reports, annual and quarterly financial statements;
 - 4.10.3. securities issue prospectus;

- 4.10.4. audit reports;
- 4.10.5. communications on significant facts in the Bank's activities;
- 4.10.6. information regarding the General Shareholders' Meetings, the most important decisions taken by the Bank's Board and development strategies of the Bank;
- 4.10.7. information on the Bank's obligation to comply with the Corporate Governance Code;
- 4.10.8. performance evaluation of the Bank's executive body and its corporate governance system;
- 4.10.9. substantiation of the suggested distribution of the net profit, dividend payments, assessment of compliance with the Bank's dividend policy, and, if necessary, clarification and economic justification of the volume of net profits used for the Bank's development purposes;
- 4.10.10. other information envisaged by effective legislation of the Republic of Uzbekistan, the Charter and internal regulations of the Bank.
- 4.11. If the Bank's securities are included and (or) remain in the quotation list of a stock exchange, the Bank shall disclose the information required in accordance with the requirements of the Quotation list regulation.
 - 4.12. The following information shall be necessarily disclosed in the mass media:
 - 4.12.1. notification on the General Shareholders' Meeting;
 - 4.12.2. notification on changes in the location (mailing address) and e-mail of the Bank:
 - 4.12.3. proposal to the Bank's shareholders who have preemptive rights to purchase shares or equity securities converted to shares;
 - 4.12.4. information on redemption of shares by the Bank;
 - 4.12.5. information on liquidation of the Bank and the procedure and timeline for raising claims by its creditors.

V. PUBLIC INFORMATION

- 5.1. Public information in the securities market means open and publicly available information, which does not require any privileges to be accessed or should be necessarily disclosed in accordance with the law "On the Securities Market" and other legislation.
- 5.2. Pursuant to the effective legislation the information on the Bank's securities and its financial and administrative activities is disclosed in:
 - 5.2.1. securities issue prospectus;
 - 5.2.2. quarterly and annual reports of the issuer;
 - 5.2.3. communications on significant facts in the issuer's activities.
- 5.3. The Bank discloses the information on significant facts in the issuer's activities that affect its financial and business activity, even if such facts are not directly specified according to the effective legislation and this Regulation (do not formally meet the definition of significant facts in the issuer's activity), but can affect the value of the Bank's shares.
- 5.4. The Bank's Board shall prepare the annual report for the General Shareholders' Meeting (hereinafter, the "GSM").
- 5.5. The annual report should be signed by the Chairman of the Management Board and the Chief accountant of the Bank. The annual report should be subject to preliminary approval by the Bank's Board at least 10 (ten) calendar days before the date of the GSM.
- 5.6. The Bank shall publish its annual financial statements upon its external audit 2 (two) weeks before the GSM at the latest.
 - 5.7. Public information is placed on the Bank's website: www.aloqabank.uz.
- 5.8. To implement the availability principle the information is published on the Bank's website in Uzbek, Russian and English languages.

VI. INFORMATION EXCHANGE BETWEEN MANAGEMENT, EXECUTIVES, EMPLOYEES AND STAKEHOLDERS

- 6.1. The Bank appoints a corporate counselor to coordinate the information exchange between members of the management bodies, executives, personnel of the Bank and stakeholders.
- 6.2. The corporate counselor shall provide all necessary information specified in this Regulation electronically within one week, unless other timeline is established by the effective legislation, upon written (electronic) request of stakeholders.
- 6.3. If copies of such documents are required, a stakeholder shall pay a fee equal to the costs incurred for copying and mailing the documents.
- 6.4. The request for examining the documents or providing copies of such documents shall be submitted to the Bank in writing specifying the full name of the requester (name and location for legal entities), number and category (type) of the shares held and title of the requested documents or information.
- 6.5. To ensure efficient communication between the Bank and its shareholders and investors, persons authorized to disclose the information on behalf of the Bank undergo regular communication trainings.
- 6.6. The Bank ensures access of its shareholders to the documents and information as stipulated by regulations on joint-stock companies.
- 6.7. The Bank's shareholders shall have the right to read and examine the Bank's documents at its location.
- 6.8. The Bank's shareholders shall not have the right to disclose the information about the Bank or its activity that constitutes a business, commercial, bank or other secret protected by law.

VII. COMMERCIAL SECRET

- 7.1. Commercial secret means the information, which has commercial value in technical, technological, industrial, financial, economic and other areas due to its protection from any third parties. This information cannot be legally accessed, and the owner of such information takes measures to keep it confidential.
- 7.2. The Bank takes measures to protect the information constituting commercial secret and prevent its leakage.
 - 7.3. Persons who have access to commercial secret of the Bank include:
 - 7.3.1. Chairman and members of the Bank's Board;
 - 7.3.2. Chairman and members of the Bank's Management Board;
 - 7.3.3. Chief accountant;
 - 7.3.4. Corporate counselor;
 - 7.3.5. Other employees of the Bank.
 - 7.4. The Bank makes non-disclosure agreements with the abovementioned persons.
- 7.5. The procedure for treating information as commercial secret, definitions and access conditions are established by the Bank in accordance with the Law of the Republic of Uzbekistan "On commercial secrecy" and other legislation.

VIII. INFORMATION PROVIDED TO THE BANK

- 8.1. If the Bank is required to disclose the information, which should be received from other persons or entities, the Bank shall take all necessary steps to obtain and update such information on a timely basis.
- 8.2. The Bank has the right to receive the information being valuable for its business in cases stipulated by the effective legislation of the Republic of Uzbekistan.

- 8.3. The procedure for disclosing personal information by candidate members of elective management bodies within the Bank, the scope and timing for submission of such information are governed by the Bank's internal regulations.
- 8.4. The members of the Bank's Board, the Chairman and members of the Bank's Management Board, shareholders holding over 20% of the Bank's voting shares shall report in writing their affiliation in the performance of a transaction by the Bank specifying the details of such transaction, including the data on the participants, its subject matter, significant contractual terms and conditions.
- 8.5. The Bank shall keep records of its affiliated parties and report in accordance with the effective legislation. The Bank shall publish the list of its affiliated parties on an annual basis following the procedure and within the timeline set by an authorized public securities regulatory body.
- 8.6. The affiliated parties shall notify the Bank in writing on their affiliation specifying the data set by an authorized public securities regulatory body within 3 (three) business days from the moment such affiliation was established as envisaged by the effective legislation.
- 8.7. If the failure to submit the above information or its untimely submission due to the fault of the affiliated party results in any material damage to the Bank, such affiliated party shall be accountable to the Bank for the damages incurred.

IX. FINAL PROVISIONS

- 9.1. This Regulation comes into effect upon its approval by the Bank's Board and may be amended any time following the same procedure.
- 9.2. This Regulation shall be observed by the Bank's management, internal supervisory bodies as well as its employees.
- 9.3. Persons guilty of breaching the requirements of this Regulation shall be held liable as established by law.
- 9.4. If certain provisions of this Regulation come into conflict with the effective legislation of the Republic of Uzbekistan and/or the Bank's Charter, such provisions shall become null and void, and in solving issues regulated by these provisions the effective legislation of the Republic of Uzbekistan and/or the Bank's Charter should be followed until this Regulation is amended appropriately.

Appendix No.1 to the Regulation on the Information Policy of JSC "Aloqabank"

List of confidential documents and information

No	Document and/or information	Sensitivity	Responsible person	Prepared by
1	Information on the nature and marketing of banking services; scope of lending services provided to legal entities, individuals and other banks; schedules, nature and scope of settlement services, trust operations, securities transactions, deposit and custodian services: - anticipated changes in scope of services provided; - anticipated investments in securities; - nature of trust operations; - computation of prices for various services; - plans and methods of marketing and promotion; - marketing development of service specifications and new types of services, including all media (documents, magnetic, computers) and premises where such developments are carried out and discussed (treated as strictly confidential); - anticipated new service markets (new segments); - plans and results of marketing researches; - marketing plans and programs; - counterparty databases; - customer databases.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	All members of the Bank's Management Board	Members of the Management Board, Marketing department, Monetary department, Department of asset and liability management, Department of foreign operations
2	- file encrypting program (ArgoCRYPT), including encryption algorithms and electronic digital signature (EDS); - database with EDS samples, floppy disks with EDS.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	Head of IT department	IT department

No	Document and/or information	Sensitivity	Responsible person	Prepared by
3	Financial and accounting information: - financing and lending sources and volumes; - terms and conditions of loans granted to the bank; - anticipated share issue volumes; - proposed budgets, budget estimates and approved budgets; - detailed balance sheets and certain types of financial statements; - management accounts.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	All members of the Bank's Management Board	Members of the Bank's Management Board, Chairman of the Management Board (head of branch)
4	Administrative and management information: - databases on senior specialists; - databases on employees, including personal characteristics, working conditions; data on general headcount, vacancies; - information on the organizational structure of the Bank; - information on anticipated appointments and rotations of key management personnel, qualified security and information protection personnel; - information on employment of senior personnel, including interviews with them; - information on banking personnel recruitment activities; - information on management conflicts.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	Head of HR department	HR department
5	- minutes of closed meetings of the executive and general shareholders' meetings, management and executive reports; resolutions of the Bank's Management Board, verbatim records of Management Board's and other meetings held by the Chairman of the Management Board on bank secret issues; - strategic banking plans; - manager databases; - shareholder and participant databases.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	Head of Asset and liability management department	All members of the Bank's Management Board
6	- schedules of unannounced inspections to be carried	"For official use only"	Head of Internal audit	Internal audit department

No	Document and/or information	Sensitivity	Responsible person	Prepared by
-	out in the Bank's structural divisions and branches (treated as strictly confidential).	(based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	department	
7	- security and access control in the Bank's offices, secret codes on access control badges; - security and fire alarm, CCTV, video control and registration; - video archive; - forms and methods of information protection, external and internal security, combating banking espionage; applicable technology (treated as strictly confidential).	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No.239 of 06.07.1996)	Head of Internal security department	Internal security department
8	Social information: - social contributions and assistance to employees; - expected reduction of personnel; - social conflicts within the bank or other structural divisions.	"For official use only" (based on the Law "On Bank Secrecy of the Central and Commercial Banks of the Republic of Uzbekistan" CB RUz No. 239 of 06.07.1996)	Head of HR department	HR department
9	Internal control information and documents	"For official use only" (based on the Law Of the Republic of Uzbekistan "On Anti-Money Laundering and Combating Terrorist Financing")	Head of Internal control department	Internal control department
10	The Bank protects the information on: - transactions, accounts and deposits of its customers (correspondents); - its customers (correspondents) who get banking services;	"Bank secret" (based on the Law of the RUz No. 530-II "On Bank Secrecy" of 30.08.2003)	Chairman of the Management Board of the bank (Head of branch), Chief accountant of the Bank (branch)	GROUP of operating cash desk specialists using the automated banking system; GROUP of accounting staff using the automated

No	Document and/or information	Sensitivity	Responsible person	Prepared by
	- existence, nature and cost of property of its customer (correspondent) which is in safe custody and safekeeping in the Bank's premises; - interbank operations and transactions effected by order or in favor of its customer (correspondent); - customers (correspondents) of another bank that became known as a result of circulation of bank secrecy data between banks.			banking system; GROUP of financial control staff using the automated banking system; GROUP of internal control staff using the automated banking system; GROUP of credit financing specialists using the automated banking system;
11	All documents (electronic and in hard copy): - on income and expense generating transactions, payment transactions which are signed by customers, sealed and stamped by the Bank's specialist and entered into the Bank's automated banking system using the electronic signature of the Bank's specialist; - credit files; - files of legal entities and individuals; - bank statements, account statements, responses to requests about banking transactions and accounts.	"Bank secret" (based on the Law of the RUz No. 530-II "On Bank Secrecy" of 30.08.2003)	Each responsible person, archivist, administrator and ABS user	Internal control department, Internal audit department, Credit departments
12	Administrator passwords to manage and protect electronic information	confidential	Head of IT department, LAN (local area network) administrator of the bank (branch)	IT department
13	User names and passwords to enter local area network and ABS	confidential	Head of IT department, LAN (local area network) administrator of the bank (branch)	IT department
14	Electronic reports for the Central Bank	confidential	Head of IT department, LAN (local area network) administrator of the bank (branch)	IT department
15	Structure of local area network	confidential	Head of IT department, LAN (local area network) administrator of the bank (branch)	IT department
16	Structure of global area network	confidential	Head of IT department,	IT department

No	Document and/or information	Sensitivity	Responsible person	Prepared by
			LAN (local area network) administrator of the bank (branch)	
17	ABS and encryption programs, electronic and digital signature certificates	confidential	Head of IT department of the bank (branch)	IT department
18	Electronic lock codes to enter the server room and the payment center	confidential	Head of Security department of the bank (branch)	Security department
19	Plastic card PIN codes	confidential	Head of plastic cards department of the bank (branch)	Plastic cards department
20	E-mail program passwords	confidential	Head of IT department, LAN (local area network) administrator of the bank (branch)	IT department
21	All incoming documents, confidential correspondence, letters and files marked as 'For Official Use Only' from senior organizations and institutions	According to the Instruction as approved by the RUz Cabinet of Ministers No.239-33 dated 05 May 1994	Management Board, First department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
22	Seals, stamps and imprints	Bank secret	Monetary department, secrecy office, monetary specialists of the Bank's branches	Cashiers, chief accountants of branches, secretariat
23	Headcount of liable for military service employees	Bank secret (personal data)	Secrecy office, HR department	HR department, local HR leaders
24	Performance records of the Bank's appointees, including negative	Bank secret (personal data)	HR department	Local HR leaders
25	Instructions to carry out negotiations, including executives' authorities to set prices, discounts and other terms and conditions	confidential	Management Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
26	Procedure and volume of financing export and import transactions	confidential	Management Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
27	Feasibility studies on properties under construction as assisted by foreign companies	confidential	Management Board, first department, functional leaders, directors and chief	Functional leaders, directors and chief accountants of branches

No	Document and/or information	Sensitivity	Responsible person	Prepared by
			accountants of branches	
28	Assumed contractual prices for the development and delivery of products or R&D deliverables	confidential	Management Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
29	Essence of agreements, contracts or proposals (orders) with foreign entities	confidential	Management Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
30	Information on modernization of the existing technology, processes and equipment to improve internal and external competitiveness	confidential	Management Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
31	Location of major cash desks, time of encashment	confidential	M Board, first department, functional leaders, directors and chief accountants of branches	Functional leaders, directors and chief accountants of branches
32	Aggregate data on computer equipment used in the supervisory computer control systems, local area networks, telecommunication systems and networks, technological infrastructure	confidential	Head of IT department of the bank (branch)	IT department