Information policy of the joint stock company "National Science Cardiac surgery center"

1. GENERAL PROVISIONS

1. This information policy "National Scientific Cardiac Surgery Center" (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter of the "National Scientific Cardiac Surgery Center" JSC, the Rules for transmitting / receiving information verbally or by phone on October 25, 2013 № 22.

2. The policy is an internal document of the joint-stock company "National Scientific Cardiac Surgery Center" (hereinafter referred to as the Company), which determines the procedure and conditions for disclosing information about the Company

3. The purpose of the Policy is the most complete and timely submission to the interested parties of reliable information about the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Rules for transferring / accepting information verbally or by telephone from October 25, 2013 No. 22, the Company's Charter.

4. The Policy should promote the creation of a favorable image of the Company, increase the value of assets and attract investment, increase production and financial performance indicators.

5. The following notions and terms are used in the Policy:

Public speeches are the speeches of 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 (hereinafter referred to as the media) can take part.

A media plan is a document in accordance with which media articles, interviews, annual financial statements, other information, as well as appearances on radio and television, approved by the Chairman of the Management Board of the Company, are published.

Corporate website is a group of electronic documents (pages) connected by a common name, subject and navigation system, prepared with the help of specialized technical means and software with the purpose of disseminating information about the Company's activity on the Internet.

Corporate communications is a complex of activities aimed at satisfying the information needs of the Company and other interested parties in reliable information about it, providing access to this information, explaining the Company's policy to all interested parties, maintaining the image and forming the reputation of the Company, forming public opinion favorable for the implementation of strategic tasks of the Company.

6. Other terms used in this Policy are applied in the meanings specified by the legislation of the Republic of Kazakhstan on the mass media.

7. This Policy of the Company is aimed at the fullest satisfaction of information needs of interested persons in reliable information about the Company, its activities and ensuring the possibility of free and easy access to this information.

8. In accordance with the current legislation of the Republic of Kazakhstan, the Company ensures the protection of information constituting commercial, official and other secrets protected by the legislation of the Republic of Kazakhstan.

9. The structural unit responsible for the preparation and organization of work on disclosing information about the Company is the Department for Marketing and Business Development (hereinafter referred to as the Department), which must have comprehensive information on the activities of the Company of interest to the business community. The department develops and implements a media plan and other documents related to corporate communications. The activities of the Department on disclosure of information about the Company are controlled by the Chairman of the Management Board of the Company.

2. PRINCIPLES OF INFORMATION DISCLOSURE

1. The Company adheres to the following principles of information disclosure to interested persons:

1) guarantee of completeness and reliability of the disclosed information;

2) efficiency of disclosure of information on all material facts in its activities;

3) regularity and timeliness of disclosure of information about the Company;

4) ensuring a high level of safety of commercial, official and other secrets protected by the legislation of the Republic of Kazakhstan;

5) a reasonable balance between the openness of the Company and the observance of its commercial interests;

6) publicity and non-selectivity of disclosure.

2. The Company provides identical disclosure of information in Kazakh, Russian and English. In the event that disclosure of information by one of the methods does not allow it to be disclosed simultaneously in Kazakh, Russian and English languages, the Company should ensure the simultaneous disclosure of such information in additional ways that provide information disclosure in all three languages.

3. The Company does not shy away from disclosing negative information about itself, if such information is material.

3. METHODS OF INFORMATION DISCLOSURE

1. The disclosure of information is understood as ensuring its accessibility to all those who are interested in it, regardless of the purpose of obtaining this information on a procedure that guarantees its finding and receipt. Disclosed information is recognized information, in respect of which actions are taken to disclose it.

2. The Company uses the following ways to disclose information to interested parties:

1) publication of information on the corporate website: www.cardiacsurgery.kz;

2) issue of corporate printed publications;

3) issue and publish on the corporate website annual reports on the activities of the Company;

4) placement and distribution of photo and video materials;

5) handing (transfer) of information on paper;

6) publication of information in the media (Kazakhstan and foreign media);

7) informing the media in the course of public statements by the representatives of the Company;

8) holding press conferences, press tours, meetings, seminars, etc. with the participation of representatives of the Company and other interested persons;

9) issue and distribution of press releases to the national media;

10) distribution of advertising, information and image printing products (booklets, brochures, leaflets, triplets, inserts, information folders, etc.);

11) holding PR - actions and presentations on certain information occasions.

3. The Company has the right to use other methods of information disclosure that are not prohibited by the legislation of the Republic of Kazakhstan and that meet the principles of information disclosure specified in this Policy.

4. In order to create a unified perception of the Company both inside and outside, the Company's structural units are required to coordinate with the Department sketches of information-image and advertising printing products on which the Company logo is used. In order to comply with a unified corporate style, the Department monitors the use of the Company's logo in documents, packaging, souvenirs, interior decoration of the office, etc.

4. PROCEDURE OF INFORMATION DISCLOSURE

1. The Company should disclose information about the Company and its activities, as such publication becomes necessary.

2. The Company provides free access to information on the Internet, which the Company is obliged to disclose in accordance with the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company.

3. The following information is disclosed in the Company's annual report:

1) appeal of the Chairman of the Board of Directors of the Company;

2) appeal of the Chairman of the Management Board of the Company;

3) key performance results;

4) the Company's goals and activities and tasks and the results of their implementation;

5) information on the Company's development strategy;

6) the mission of the Company;

7) priority areas of the Company's activities;

8) the goals and objectives of the Company;

9) evaluation of the Company's activities for the year, including comparison of the achieved results with the planned ones, as well as in the dynamics for the last three years;

10) information on significant corporate events;

11) market share of the Company by main types of activity;

12) information on the investment plans of the Company;

13) information about the purposes for the future periods;

14) information on the main risk factors and the risk management system of the Company;

15) information on the Company's corporate governance system, including information on the organizational structure of the Company, the structure of the Company's bodies, their functions, powers and composition, including the qualification and selection process of members of the Company's bodies;

16) a report on the activities of the Board of Directors of the Company and the Management Board of the Company, the most important decisions taken;

17) the basic principles of remuneration for members of the Company's Management Board and the Board of Directors of the Company;

18) information on the corporate social responsibility policy, including on health protection of employees, their professional training, occupational safety and environmental protection;

19) annual financial statements and audit report.

20) the annual report of the Company is prepared in three languages: Kazakh, Russian and English. The Company ensures distribution of the annual report among the maximum number of interested persons of the Company.

21) The following information is disclosed on the corporate website:

1) annual reports of the Company;

2) general information about the Company: the mission of the Company, the main tasks, goals and activities of the Company, the number of employees of the Company;

3) a public version of the Company's development strategy;

4) priority areas of the Company's activities;

5) the decision to establish the Company;

6) the Charter of the Company, as well as changes and amendments made to the Company's Charter;

7) internal documents regulating the activities of the Company's units;

8) the Corporate Governance Code of the Company;

9) risk management policy;

10) Regulations on the Board of Directors of the Company;

11) position of the Committee of the Board of Directors on internal audit issues of the Company;

12) provision on the Internal Audit Service of the Company;

13) organizational structure of the Company;

14) provision on independent directors of the Company;

15) analysis and assessment by the management of the financial and economic activities of the Company;

16) information on interested-party transactions, including details of the parties to the transaction, the material terms of the transaction (the subject matter of the transaction, the price of the transaction), the Department of the Company that made the decision to enter into the transaction;

17) information on major transactions, including details of the parties to the transaction, the essential terms of the transaction (the subject matter of the transaction, the price of the transaction), the Department of the Company that has decided to conclude the transaction;

18) reports on sustainable development and other non-financial reporting;

19) information on the members of the Management Board of the Company, upon their written consent, including the following information:

- the photo,

- Full Name,

- Date of Birth,

- citizenship,

- position and performed functions,

- education, including basic and additional education (name of educational institution, year of graduation, qualification, degree obtained);

- work experience for the last five years,

- Positions held in combination.

20) Information on the members of the Board of Directors of the Company, upon their written consent, including the following information:

- Full Name,

- Date of Birth,

- citizenship,

- education, including basic and additional education (name of educational institution, year of graduation, qualification, degree obtained);

- work experience for the last five years,

- the main place of work and other current positions,

- the date of the first election to the Board of Directors of the Company and the date of election to the current membership of the Board of Directors of the Company.

- criteria of independent directors.

21) annual financial statements of the Company;

22) the policy of remuneration of the members of the Management Board of the Company;

23) the main regulatory legal acts of the Republic of Kazakhstan (or excerpts from them), establishing the composition and procedure for disclosure by the Company of information;

24) information on the implementation of investment and government programs in which the Company participates;

25) this Policy;

26) other documents (materials) stipulated by the legislation of the Republic of Kazakhstan and separate decisions of the Board of Directors of the Company, Chairman of the Management Board of the Company.

27) information on corporate governance practices of the Company:

- structure and competencies of the Company's Department s;

- list and functions of the members of the Board of Directors of the Company;

- information on the internal audit of the Company, information on the evaluation policy of the work of the Board of Directors of the Company;

- general information on the internal control system and risk management system;

- information on the nature of state influence, including a list of issues requiring coordination with government agencies;

28) news and press releases;

29) a document defining the information policy of the Company;

21. Information on the Chairman of the Management Board of the Company should be sent by the Secretary of the Management Board of the Company, information on the Chairman of the Board of Directors of the Company should be sent to the Department by the corporate secretary of the Company and placed within 5 (five) calendar days from the receipt of information.

22. Reports on material facts (events, actions) affecting the financial and business activities of the Company that may have a material impact on the financial condition of the Company, as well as other information, the disclosure obligation arises from the Company in accordance with the legislation of the Republic of Kazakhstan, are published in the following terms, from the moment of occurrence of the relevant event, unless other terms and forms of public dissemination of information are established by the Company's Charter, the Policy, other internal and the legislation of the Republic of Kazakhstan:

1) in the media, provided by news agencies and other organizations, within a period not later than 5 (five) business days from the occurrence of the relevant event;

2) on the Company's website no later than 3 (three) business days from the date of the relevant event.

23. Disclosure of information on a significant corporate event is mandatory in the form of a press release. The Company may use other ways of disseminating information about significant corporate events only at the same time or after the release of the corresponding press release. The press release is initiated by any structural Department of the Company. The initiator of the press release transmits a press release to the Project Department. The department makes the necessary changes to the draft press release and coordinates it with the initiator of the press release and other interested structural Department s of the Company. All

participants of the agreement must submit their comments and proposals to the Department in a working order within 1 (one) day from the receipt of the draft press release. The department coordinates the final draft of the press release with the Deputy Chairman of the Management Board of the Company and / or with the First Deputy Chairman of the Management Board of the Company. Press releases of the Company are issued in Kazakh, Russian and, if necessary, English. The press release is distributed on the database of the Department containing the e-mail addresses of the editorial offices of the republican and regional mass media of Kazakhstan and is posted on the corporate website.

24. Articles, interviews, information materials on the Company's current activities are prepared and sent by the Company's structural units to the Department . The department processes, edits the information provided and coordinates in the working order the ready-made information materials with the managers and those responsible for the preparation of information by employees of the Company's structural Department s.

25. Requests from media representatives entering the Society should not be ignored. They must be immediately transferred to the Department to determine how to respond to them. The provision of media information on behalf of the Company is carried out in writing by the head of the Department or an authorized employee. All structural units of the Company are required to submit information to the Department in oral or written form within 3-7 (three to seven) days after receipt of the request from the Department . In accordance with the requirements of the legislation of the Republic of Kazakhstan, if the research is required to prepare a response, calculations, analysis, information from third parties, information is provided by the structural unit within 30 (thirty) calendar days with prior notification to the Department. The Head of the Department has the right to send inquiries from the mass media, either orally or in writing, directly to the Chairman of the Company's Management Board, to the Deputy Chairmen of the Management Board and to the Managing Directors of the Company. Refusal to provide the requested media with information from the Company's side is possible if it contains information constituting state secrets, official, commercial or other secret protected by law. Responsibility for untimely provision of information to the Department for distribution to the media, as well as inaccuracy and inaccuracy of information, is borne by the heads of structural units who provided information to the Department .

26. The location of the video and photography is determined by the Head of the Department and approved by the Chairman of the Company's Management Board or Deputy Chairmen of the Management Board.

27. Publication of press releases, messages, advertising materials and other information on the Company's activities not specified in paragraph 22 of this Policy will be carried out by the Company in the media, in brochures and booklets as the publication of such publication becomes necessary.

28. The Company, as necessary, organizes press conferences on important events that occur or will occur in the Company, hold meetings with investors and representatives of public authorities, including if they receive a written request from the said persons. Upon receipt of a written request, the Company is obliged to organize such a meeting within a reasonable time, or to send a motivated refusal, or reply on the substance of the matter, signed by the Chairman of the Company's Management Board or his authorized representative.

29. The Company aspires to participate in the work of Kazakhstan and international conferences and forums as much as possible, and independently organize them.

5. PROCEDURE OF INFORMATION DISCLOSURE BY REPRESENTATIVES OF THE COMPANY

1. The right of public speeches on behalf of the Company is enjoyed by the members of the Board of Directors of the Company, the Chairman of the Board of Directors, the Chairman of the Management Board of the Company and the Deputy Chairman of the Management Board of the Company. Other officials and employees of the Company have the right to speak publicly on behalf of the Company at conferences and meetings held in the country and abroad, at meetings of working bodies of ministries and departments, executive and legislative authorities of the Republic of Kazakhstan, participate in press conferences, briefings, telephone and videoconferences, public events, give interviews, comment with the Kazakhstani and foreign media on the decision of the Chairman of the Management Board of the Company.

2. The Chairman of the Board of Directors of the Company formally comments and interprets the decisions taken by the Board of Directors of the Company, and sets forth the views of the Board of Directors (within the framework of telephone conferences, interviews, etc.) on issues considered at meetings of the Board of Directors of the Company. Members of the Board of Directors of the Company will have the right to publicly state their personal point of view on issues

considered at the meetings of the Board of Directors of the Company, as well as on decisions taken at a meeting of the Board of Directors of the Company. The members of the Board of Directors of the Company will be entitled to comment and inform the interested parties about the decisions taken at the meetings.

3. Information on the activities of the Company in the course of public speeches by the Company's employees, with the exception of the Chairman of the Board of Directors, members of the Board of Directors of the Company and the Chairman of the Company's Management Board, is provided as part of the performance of their duties after preliminary approval by the Division.

6. FINAL PROVISIONS

1. Control over compliance with the requirements of the Policy is carried out by the Company's Management Board.

2. The Board of Directors of the Company will have the right to request from the Chairman of the Management Board of the Company information on compliance with this Policy and the legislation of the Republic of Kazakhstan regarding the disclosure of information by the Company.

3. Video, audio, photos of any educational events of the Society (congresses, conferences, symposia, forums, seminars, workshops, meetings, round tables, trainings, mentorships, etc.) containing information about ideas, inventions, techniques treatment, scientific developments and methods of their application are provided after preliminary agreement with the subordinate Division.

4. The issues not regulated by this Regulation will be regulated by the legislation of the Republic of Kazakhstan, the Company's Charter and decisions of the Board of Directors of the Company.

4. If, as a result of changes in the legislation of the Republic of Kazakhstan, certain items of this Policy conflict with the legislation of the Republic of Kazakhstan, these paragraphs become invalid, and until the changes are made to this Policy, the Company is guided by the legislation of the Republic of Kazakhstan.