

«APPROVED»

**By the decision of the Board of
Directors of NJSC «West
Kazakhstan Marat Ospanov
Medical University»
from February 14, 2020
minutes No. 2.**

REGULATION

**on information policy of non-commercial joint-stock company
«West Kazakhstan Marat Ospanov Medical University»**

Aktobe, 2020

1. GENERAL PROVISIONS

1. This Regulation on the information policy of the non-commercial joint-stock company «West Kazakhstan Marat Ospanov Medical University» (hereinafter - the Policy) is developed in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter of the non-commercial joint-stock company «West Kazakhstan Marat Ospanov Medical University».

2. The policy is an internal document of the non-commercial joint-stock company «West Kazakhstan Marat Ospanov Medical University» (hereinafter - 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 interested parties of reliable information about the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan.

4. The policy should contribute to creating a favorable image of the Company.

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

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 media (hereinafter - the media) can take part.

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

An Internet resource is a group of electronic documents (pages) related by a common name, theme and navigation system, prepared using specialized hardware and software in order to disseminate information about the Company's activities on the Internet.

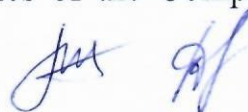
Corporate communications - a set of measures aimed at satisfying the information needs of the Company and other interested parties in reliable information about it, providing access to this information, explaining the Company policy to all interested parties, maintaining the image and building the reputation of the Company, creating a public opinion favorable for the implementation of strategic tasks of the Company.

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

7. This Policy of the Company is aimed at the most complete satisfaction of the information needs of interested parties in reliable information about the Company, its activities and the provision of free and easy access to this information.

8. In accordance with the current legislation of the Republic of Kazakhstan and internal documents 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 preparing and organizing the work on disclosing information about the Company is the structural unit in the field of public relations (hereinafter - the Responsible structural unit) which should have comprehensive information on the activities of the Company that is of interest to



stakeholders. The responsible structural unit develops and implements a media plan and other documents related to corporate communications.

2. PRINCIPLES OF INFORMATION DISCLOSURE

10. The company adheres to the following principles of information disclosure to interested parties:

- 1) guarantee of the completeness and reliability of the information disclosed;
- 2) prompt disclosure of information about all material facts in its activities;
- 3) regular and timely disclosure of information about the Company;
- 4) ensuring a high level of security of commercial, official and other secrets protected by the legislation of the Republic of Kazakhstan;
- 5) a reasonable balance between the openness of the Society and respect for its interests;
- 6) publicity and non-selectivity of information disclosure.

11. The company provides identical disclosure of information in Kazakh and Russian languages. If disclosure of information by one of the methods does not allow to disclose it simultaneously in the Kazakh and Russian languages, the Company provides simultaneous disclosure of such information by additional methods that ensure disclosure of information in all the specified languages.

12. The company does not shy away from disclosing negative information about itself if such information is material.

3. METHODS OF INFORMATION DISCLOSURE

13. Disclosure of information is understood as ensuring its availability to all interested parties, regardless of the purpose of obtaining this information through a procedure that guarantees its finding and receipt. Disclosed information is information that has been subject to disclosure actions.

14. The company uses the following methods of disclosing information to interested parties:

- 1) the publication of information on the Internet site: www.zkgmu.kz;
- 2) placement of financial statements on the Internet resource of the Depository;
- 3) placement and distribution of photo and video materials;
- 4) delivery (forwarding) of information in hard copy;
- 5) publication of information in the media (Kazakh and foreign media);
- 6) informing the media during public speeches by representatives of the Company;
- 7) holding press conferences, press tours, meetings, seminars, etc. with the participation of representatives of the Company and other interested parties;
- 8) release and distribution of press releases to the national media;
- 9) distribution of advertising, information and image printing products (booklets, brochures, liflets, triflate, bearings, etc.);
- 10) conducting PR - actions and presentations on certain informational occasions.

15. 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 defined by this Policy.

16. In order to create a unified perception of the Company, both inside and outside, the structural units of the Company are required to coordinate with the Responsible structural unit of information-image, advertising printing products that use the corporate identity (logo) of the Company. In order to maintain a unified corporate identity, the Responsible structural unit monitors the use of the Company's logo in documents, packaging, souvenir products, office interior decoration, etc. and sends comments for mandatory elimination to the structural unit responsible for the manufacture of any product using the logo.

4. INFORMATION DISCLOSURE PROCEDURE

17. The Company discloses information about the Company and its activities, as the need arises for such publication.

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

19. The annual report of the Company approved by the Board of Directors is disclosed in accordance with the Charter and the provisions of the Corporate Governance Code of the Company.

20. The Internet resource should contain the following minimum information:

1) general information about the Company, including information on the main tasks, goals and types of activities, the amount of equity capital, assets, net income and number of staff;

2) on the development strategy and / or development plan in agreement with the Responsible structural unit (at least strategic goals), priority areas of activity;

3) The Charter and internal documents of the Company governing the activities of bodies, committees, and the corporate secretary;

4) on ethical principles;

5) on risk management;

6) on members of the Board of Directors, including the following information: photo, last name, first name, patronymic (if any), date and place of birth, marital status, language skills, status of a member of the Board of Directors (independent director, chairman or member), main place work, education, including primary and secondary (name of educational institution, year of graduation, specialty, qualification, degree obtained), work experience;

7) on the members of the Management Board, including the following information: photo, surname, name, patronymic (if any), date of birth, citizenship, position and functions performed, education, including primary and secondary education (name of educational institution, year of graduation, qualification, degree obtained), work experience over the past five years, professional qualifications, positions held concurrently;

8) on financial statements;

9) on annual reports;

10) on the Internal Audit Service

11) on procurement activities, including rules, announcements and procurement results;

12) on the structure of the authorized capital, including the following information: the number and nominal value of issued shares (participatory interests), a description of the rights granted by shares, the number and nominal value of declared but unplaced shares, the composition of shareholders (participants), the number and proportion of ordinary shares owned by them shares (participatory interests), the procedure for disposing of ownership;

13) on the annual calendar of corporate events;

14) on activities in the field of sustainable development;

15) about news and press releases.

21. Information about the Chairman of the Management Board - Rector of the Company is sent by the secretary of the Management Board of the Company, information about the Chairman of the Board of Directors of the Company is sent by the corporate secretary of the Company to the Responsible structural unit and posted within 5 (five) calendar days from the receipt of information.

22 Mandatory disclosure of information is disclosed by the Company to relevant interested parties in the manner and terms established by the legislation of the Republic of Kazakhstan, including Article 79 of the Law of the Republic of Kazakhstan «On Joint-Stock Companies», Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 27, 2018 No. 189 «On approval of the Rules for the issuer to disclose information, Requirements for the content of information to be disclosed by the issuer, as well as the timing of disclosure by the issuer of information on the Internet resource de ozitariya Financial Reporting» and other legislative acts of the Republic of Kazakhstan.

23. Messages on material 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, is published in the following terms, 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, the Policy, and other internal Company's cuments and legislation of the Republic of Kazakhstan:

1) in the media provided by news agencies and other organizations, no later than 3 (three) business days, subject to agreement with the Chairman of the Management Board - the Rector of the Company from the moment the relevant event occurs;

2) on the Internet resource of the Company no later than 3 (three) business days from the moment the corresponding event occurs.

24. The company may use other methods of disseminating information about significant corporate events only at the same time or after the release of the corresponding press release. A press release is initiated by any structural unit of the Company (hereinafter - the initiator). The initiator of the press release submits the draft press release to the Responsible structural unit. The responsible structural unit makes the necessary changes to the draft press release and coordinates it with the initiator of the press release and other interested structural divisions of the Company. All parties to the agreement must submit their comments and suggestions in a working order to the Responsible structural unit within 1 (one) day from the receipt of the draft press release. The responsible structural unit approves the final draft press

release with the Chairman of the Management Board of the Company and / or with the Managing Director for work with users of medical care and relations with government bodies of the Company. Press releases of the Company are issued in Kazakh, Russian and, if necessary, English. The press release is distributed through the database of the Responsible structural unit containing the electronic addresses of the editorial offices of the republican and regional mass media of Kazakhstan, and is posted on the Internet resource.

25. Articles, interviews, information materials on the current activities of the Company are prepared and sent by the structural divisions of the Company to the Responsible structural unit. The responsible structural unit processes, edits the information provided and agrees in the working order the finished information materials with the managers and employees of the structural divisions of the Company responsible for the preparation of the information.

26. Requests of media representatives coming to the Company should not be ignored. They should be immediately transferred to the responsible structural unit to determine how to respond to them. The provision of information to the media on behalf of the Company is carried out in writing or electronically (by e-mail) by the head of the Responsible structural unit or an authorized employee. All structural divisions of the Company are required to submit written information to the Responsible structural unit within 1-3 (one-three) days after receiving a request from the Responsible structural unit. In accordance with the requirements of the legislation of the Republic of Kazakhstan, if a response is required to conduct research, calculations, analysis, and obtaining information from third parties, then the information is provided by the structural unit within 30 (thirty) calendar days with prior notification of this Responsible structural unit. The head of the Responsible structural unit has the right to send requests from the media orally or in writing directly to the Chairman of the Management Board and the managing directors of the Company. A refusal to provide information requested by the media by the Company is possible if it contains information constituting state secrets, official, commercial or other secret protected by law. Responsibility for untimely submission of information to the Responsible structural unit for distribution to the media, as well as inaccuracy and inaccuracy of information, lies with the heads of structural divisions who submitted information to the Responsible structural unit.

27. The place of the video, photography is determined by the head of the responsible structural unit. The Company, as necessary, organizes press conferences on important events that occur or will occur in the Company, holds meetings with representatives of state authorities, including in the event that a written request is received from these persons. Upon receipt of a written request, the Company is obliged to organize such a meeting within a reasonable time, or send a reasoned refusal, or an answer on the merits of the issue, signed by the Chairman of the Management Board - the Rector of the Company or an authorized person. The organizer of the meeting is the initiator.

28. The company seeks to participate as actively as possible in the work of Kazakhstani and international conferences and forums, as well as independently organize them.

5. ORDER OF DISCLOSURE OF INFORMATION BY



REPRESENTATIVES OF THE COMPANY

29. Members of the Board of Directors of the Company, the Chairman of the Board of Directors, the Chairman and members of the Management Board of the Company, as well as Managing Directors within their competence have the right to make public speeches on behalf of the Company. Other officers and employees of the Company are entitled to speak publicly on behalf of the Company at conferences, meetings, seminars, meetings of working bodies of ministries and departments, executive and legislative authorities of the Republic of Kazakhstan, held in the country and abroad, participate in press conferences, briefings, telephone and video conferencing, social events, giving interviews, making comments for Kazakhstani and foreign media outlets on the basis of their memos (letters, invitations, telephone messages, etc.) .) Agreed with the Chairman of the Board - Rector of the Company.

30. The Chairman of the Board of Directors of the Company officially comments and interprets the decisions made by the Board of Directors of the Company, and also sets out the point of view of the Board of Directors (in the framework of telephone conferences, interviews, etc.) on issues discussed at meetings of the Board of Directors of the Company. Members of the Board of Directors of the Company have the right to publicly state their personal point of view on issues considered at 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. Members of the Board of Directors of the Company have the right to comment and bring to the attention of interested parties information on decisions taken at meetings.

31. Information on the activities of the Company during public speeches by employees of the Company, 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 Management Board - Rector of the Company, is provided as part of their duties after prior approval by the Responsible structural unit.

6. FINAL PROVISIONS

32. Monitoring compliance with the requirements of the Policy is carried out by the Management Board of the Company.

33. The Board of Directors of the Company has the right to request information from the Chairman of the Management Board - Rector of the Company on compliance with this Policy and the legislation of the Republic of Kazakhstan regarding disclosure of information by the Company.

34. Issues not regulated by this Regulation are governed by the legislation of the Republic of Kazakhstan, the Charter of the Company and decisions of the Board of Directors of the Company.

35. If, as a result of changes in the legislation of the Republic of Kazakhstan, certain clauses of this Policy conflict with the legislation of the Republic of Kazakhstan, then these clauses are subject to cancellation prior to the introduction of the corresponding amendments and additions to this Policy in order to bring it into line with the legislation of the Republic of Kazakhstan.

