

Translated from Russian

Regd. No. 04-14/46 dated 10/09/2020

APPROVED  
By the Supervisory Board  
of "ANOR BANK" JSC  
on September 10, 2020  
(Minutes No. 2)

*signed*  
Karimbaev Sh.K.  
Chairman of Supervisory Board  
Official seal

**INFORMATION POLICY  
OF "ANOR BANK"  
JOINT-STOCK COMPANY**

Tashkent, 2020

## CHAPTER 1. GENERAL PROVISIONS

1.1. This Information Policy of "ANOR BANK" JSC (hereinafter referred to as the "Policy") was developed in accordance with the requirements of the Laws of the Republic of Uzbekistan "On Banks and Banking Activities", "On Joint-Stock Companies and Protection of Shareholders' Rights", "On the Securities Market", Decree of the President of the Republic of Uzbekistan No. UP-4609 "On additional measures to further improve the investment climate and business environment in the Republic of Uzbekistan" dated 04/07/2014, Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No.176 "On measures on further improvement of the corporate governance system in joint stock companies" dated 07/02/2014, Rules for the provision and publication of information on the securities market (registered by the Ministry of Justice of the Republic of Uzbekistan No. 2383 dated July 31, 2012), Regulations on the minimum requirements for the activities of commercial banks when carrying out relationships with consumers of banking services (registered by the Ministry of Justice of the Republic of Uzbekistan No. 3030 dated July 2, 2018. ) and the Charter of "ANOR BANK" JSC (hereinafter referred to as the "Bank").

1.2. The Bank, being a credit institution, fulfills its obligations to disclose information about its activities in accordance with legal requirements.

1.3. The information policy contains a description of the composition of information subject to mandatory disclosure by the Bank, the procedure and methods for its disclosure, as well as restrictions on unauthorized dissemination, disclosure and use of information about the Bank's activities, the composition of information additionally disclosed by the Bank, as well as methods of external and internal communications used by the Bank for forming a reliable idea of your activities.

1.4. The information policy is aimed at the following target audiences:

- shareholders and investors of the Bank;
- clients of the Bank (current and potential);
- the Bank's counterparties ;
- analysts, professional securities market participants and other representatives of the investment community;
- members of the Bank's management bodies;
- Bank employees;
- mass media (hereinafter referred to as "mass media");
- public.

1.5. The Bank operates in a mode of information openness towards all target audiences.

Access to public information, except for cases established by law, is provided by the Bank free of charge and does not require special procedures (obtaining passwords, registration or other technical restrictions) to become familiar with it.

1.6. The main channels for disclosing information about the Bank/communication tools are:

- official website of the Bank on the Internet: [www.anorbank.uz](http://www.anorbank.uz)
- official website of the stock exchange: [www.uzse.uz](http://www.uzse.uz)
- Unified Corporate Information Portal: [www.openinfo.uz](http://www.openinfo.uz) ;
- corporate materials (reports, presentations, official press releases of the Bank, etc.);

- meetings, thematic conferences, press conferences, meetings, forums;
- modern remote information exchange tools (including video, conferencing, web broadcasts);
- periodicals (newspapers, magazines, etc.);
- official presence of the Bank in social media.

Information is disclosed in Russian, Uzbek and English.

1.7. In order to inform its target audiences, the Bank may disclose on its official website on the Internet [www.anorbank.uz](http://www.anorbank.uz) dates of the main regular corporate events, dates of publication of reports and other financial information for the coming year.

1.8. The Bank ensures the disclosure of information about all significant aspects of its activities by complying with legally established requirements, and also discloses additional information about itself specified in section 4.8 of this Policy.

1.9. In accordance with the legislation of the Republic of Uzbekistan and internal regulatory documents, the Bank ensures the protection of information constituting state, banking, official or commercial secrets, personal data, and complies with its own information security requirements.

## **2. GOALS AND OBJECTIVES OF THE INFORMATION POLICY**

2.1. The objectives of the Information Policy are:

- compliance by the Bank with the requirements of the legislation of the Republic of Uzbekistan, the Central Bank of the Republic of Uzbekistan, requirements of exchanges, internal documents of the Bank;
- compliance with the rights and legitimate interests of shareholders, clients and other interested parties to receive information;
- increasing the level of information transparency and corporate governance of the Bank;
- increasing the availability of information about the Bank and its activities.

2.2. The information policy is aimed at solving the following main tasks:

- increasing the level of openness and trust in the Bank's relations with various target audiences (shareholders, clients and other interested parties);
- maintaining professional and trusting relationships with the media based on the free exchange of reliable information;
- improvement and/or expansion of existing communication channels to better inform shareholders, clients and other interested parties;
- protection of information about the Bank, the disclosure and/or use of which may harm the interests of the Bank, its shareholders, clients and counterparties, or lead to advantages of some stakeholders over others.

## **3. BASIC PRINCIPLES OF THE INFORMATION POLICY**

3.1. The Bank's disclosure of information is carried out in accordance with the principles of regularity, consistency, efficiency, accessibility, equality, reliability, completeness and comparability of the disclosed data.

3.2. The principles of regularity, consistency and efficiency imply:

- ensuring continuity of the information disclosure process;
- compliance with regulatory requirements regarding timely disclosure of information about the Bank and its securities;
- compliance with the shortest deadlines for informing shareholders, investors, and other interested parties about the Bank's activities, as well as promptly providing information about

the Bank's position in relation to rumors or unreliable data that create a distorted idea of the Bank's valuation and/or the value of its securities.

3.3. The principle of accessibility of disclosed information means the Bank's use of various channels and methods of information disclosure, primarily electronic, accessible to the majority of interested parties.

3.4. The principles of reliability, completeness and comparability of disclosed data mean:

- information provided by the Bank is objective;
- when covering its activities, the Bank strives for the most complete disclosure of information;
- the information disclosed by the Bank is clear and consistent, and the data is comparable;
- when disclosing financial information, its neutrality is ensured, that is, the independence of the presentation of this information from the interests of any individuals or their groups.

#### 4. DISCLOSURE OF INFORMATION

Disclosure of information for the purposes of this Information Policy means ensuring the availability of information to all interested parties in accordance with a procedure that guarantees its location and receipt.

4.1. Disclosure of information about the Bank's activities in accordance with Decree of the President of the Republic of Uzbekistan No. UP-4609 "On additional measures to further improve the investment climate and business environment in the Republic of Uzbekistan" dated 04/07/2014. and Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 176 "On measures to further improve the corporate governance system in joint-stock companies" dated 07/02/2014, subject to mandatory posting on the Bank's corporate website:

- the subject and goals of the bank's activities;
- the bank's charter, including amendments and additions to it, and the bank's approved business plans;
- information about the bank's development strategy;
- the organizational structure of the bank, the names of its structural divisions, branches, representative offices, subsidiaries and dependent business entities, their telephone numbers, addresses (postal and electronic), information about the procedure for their work;
- background information about the managers (chairman of the board) of the bank;
- information about vacant jobs, conditions of employment and requirements for candidates;
- information about collegial and advisory bodies (commissions, committees, etc.) formed by the bank or its management bodies;
- list of bank affiliates;
- internal documents of the bank on corporate governance issues, including the corporate governance code approved by the general meeting of shareholders;
- voting results on decisions adopted at the general meeting of shareholders (published within thirty days from the date of adoption of these decisions);
- information about the general meeting of shareholders, date, time, location, agenda;
- prospectuses for the issue of securities, as well as quarterly and annual reports of the company, subject to disclosure in accordance with the legislation on the securities market;

- information about public events held by the bank (meetings, meetings, meetings, press conferences, seminars and briefings, round tables, official visits), press releases and other information about daily activities; – list, conditions and tariffs of provided banking services;

- information about open competitions (tenders) and auctions held by the bank for the supply of goods (performance of work, provision of services);

- current information on the main indicators characterizing the financial and economic condition of the bank and the dynamics of its development, analytical reviews of an informational nature on the bank's activities;

- information on accrued and paid dividends for the last three years, including information on the amount of debt, contact and other information for shareholders to receive dividends;

- conclusion of the audit organization based on the results of the audit of the annual financial and economic activities;

- information about the bank's acquisition of shares;

- requirement for mandatory indication of a link to the bank's corporate website when other persons use the information materials contained therein.

#### 4.2. Information disclosed by the Bank as a credit institution

4.2.1. In accordance with the requirements of the legislation of the Republic of Uzbekistan and the recommendations of the Central Bank of the Republic of Uzbekistan, the Bank, being a credit institution, discloses:

- basic information (charter, ownership structure, full and abbreviated corporate names of the Bank; date of entry on the state registration of the Bank; TIN; data on the Bank's participation in the field of ensuring the protection of deposits of citizens of the Republic of Uzbekistan, foreign citizens and stateless persons; information on licenses; information about the address and location of the head bank, branches, banking service centers, mini-banks of the Bank on the territory of the Republic of Uzbekistan (their contact information, organizational structure of the bank, etc.);

- functional information (about the Bank's banking products and services with a detailed description of their characteristics, costs (tariffs) and rules for establishing contractual relationships with clients; information about consumer lending, other information on consumer lending; forms of agreements for the provision of banking services, universal agreements, offers; on the procedure for considering consumer requests (methods of appeal and shipping addresses), etc.);

- information on interest rates, deposits under bank deposit agreements with individuals;

- information on the composition, qualifications and work experience of members of the Supervisory Board; Chairman of the Board of the Bank, his deputies; members of the Board; chief accountant, key personnel of the Bank;

- development strategy and corporate values of the bank;

- history of the bank (information about the foundation of the bank, its reorganization, renaming, information about the features or changes in activities);

- information on the revocation of the Bank's license in connection with a violation of the legislation of the Republic of Uzbekistan or in connection with the adoption by the Central Bank of the Republic of Uzbekistan of a decision to revoke the license based on the Bank's application (if such events occur);

- news and press releases about changes in structure, form of ownership, etc.

- information about the composition of the bank group and their structure: names of legal entities, participation in the authorized capital, addresses (postal and electronic);

- information about the committees/commissions operating under the Supervisory Board and the Management Board of the bank, a brief description, their composition, information about the positions held by members of committees/commissions in other organizations, information about the qualifications and work experience of members of committees/commissions;

- internal regulatory documents: Code of Corporate Ethics, this Information Policy, Dividend Policy;

- if rating agencies assign ratings to a bank, a list of ratings for the last three years and rating reports (explanations);

- other information in accordance with the law.

4.22. The following information must be disclosed when describing the ownership structure:

- information about shareholders who directly own at least five percent of the bank's authorized capital, the size of their share, type of shares (common, preferred), location (residence), type of activity (for legal entities);

- information about shareholders who indirectly own at least five percent of the bank's authorized capital, location (residence), type of activity (for legal entities) and other information about the reasons for owning the bank's shares;

- last name, first name, patronymic of the ultimate beneficial owner (if any).

4.23. The Bank discloses the information specified in clause 4.2.1, as well as other information mandatory for disclosure in accordance with the legislation of the Republic of Uzbekistan in the manner established by the regulatory documents of the Central Bank of the Republic of Uzbekistan, on the Russian, Uzbek and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz).

4.3. Information disclosed by the Bank as an issuer of securities

4.3.1. The Bank, being an issuer of securities, in accordance with the requirements of the legislation of the Republic of Uzbekistan, discloses the following information, including by posting on the official website of the authorized state body for regulating the securities market:

- annual report and prospectus for the issue of securities for review by all interested parties;

- information about the place and procedure for familiarizing yourself with the text of the securities prospectus, as well as other information in accordance with the Law "On the Securities Market";

- the issuer's report on the results of the first quarter, the first half of the year and nine months following the reporting month;

- messages about material facts;

- the text of the bank's charter, including amendments and additions to it;

- other information established by the requirements of the legislation of the Republic of Uzbekistan on securities or regulations of the Central Bank of the Republic of Uzbekistan.

4.3.2. Disclosure of information specified in clause 4.3.1 is carried out in the volume, order, forms and within the time limits established by the legislation of the Republic of Uzbekistan and regulations of the Central Bank of the Republic of Uzbekistan.

4.3.3. Publication of information subject to publication in print media is carried out in the Economic Newspaper "Stock Exchange".

4.4. Information disclosed by the Bank as a professional participant in the securities market

4.4.1. The Bank, being a professional participant in the securities market, in accordance with the requirements of the legislation of the Republic of Uzbekistan, discloses the following information at the request of the investor:

- a copy of the state registration document;
- a copy of the license;
- information about the authorized capital, the amount of own funds of a professional participant in the securities market and its reserve fund;
- information on state registration of the issue of securities purchased by the investor;
- information contained in the prospectus for the issue of securities purchased by the investor, as well as on the prices for these securities during the six weeks preceding the date the investor submitted a request for information;
- reporting on the results of transactions with securities within the time limits specified in the agreement.
- other information recommended by the legislation of the Republic of Uzbekistan for disclosure.

4.4.2. Disclosure of information specified in clause 4.4.1 is carried out in the volume, order, forms and within the time limits established by the legislation of the Republic of Uzbekistan and regulations of the Central Bank of the Republic of Uzbekistan.

4.5. Providing information to shareholders in preparation for the general meeting of shareholders

4.5.1. The Bank strives to create the most comfortable conditions for the Bank's shareholders to make informed and informed decisions on issues on the agenda of the general meeting of shareholders.

4.5.2. Information to be provided to shareholders in preparation for the meeting is published (provided) by the Bank in a manner and within a time frame that gives shareholders the opportunity to properly prepare for participation in the meeting:

- the message about the holding of the general meeting of shareholders is disclosed by the Bank on the Uzbek, Russian and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz) in the section "Shareholders and Investors", published in the media, and also sent to shareholders by email no later than twenty-one days, but not earlier than thirty days before the date of the general meeting of shareholders;

- access of shareholders to information (materials) provided to persons entitled to participate in the meeting (hereinafter referred to as "Materials for the meeting") is provided by the Bank no later than 21 days before the date of the meeting, and in cases established by the legislation of the Republic of Uzbekistan no later than the established deadlines before the date of the meeting; in paper form: at the location of "ANOR BANK" JSC in electronic form: in Uzbek, Russian and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz) in the section "Shareholders and Investors";

4.5.3. A detailed list of information included by the Bank in the Materials for the meeting is reflected in the "Regulations on the General Meeting of Shareholders", posted on the Uzbek, Russian and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz) in the "Shareholders and Investors" section.

4.6. Providing access to information at the request of shareholders and other authorized persons

4.6.1. In order to ensure the rights of shareholders to receive information in accordance with the Law of the Republic of Uzbekistan "On Joint-Stock Companies and Protection of Shareholder Rights," the Bank provides shareholders, as well as persons exercising rights

under shares and their representatives (hereinafter referred to as "authorized persons") with access to relevant documents, provided for by the above law.

4.6 . 2. Access of eligible persons to documents can be carried out in the form of providing documents for review at the location of the executive body of the Bank at the address: Republic of Uzbekistan, 100170, Tashkent city, Mirzo Ulugbek district, st. Sayram 5<sup>th</sup> passage, building 4 and (or) in the form of providing copies of documents. The form of providing access to documents is determined by the authorized person.

#### 4.7. Disclosure of information about the Bank's corporate governance system

4.7.1. The Bank discloses the following information about the corporate governance system:

- on the organization and general principles of corporate governance of the Bank;
- information about the Management Board of the Bank (composition of the Management Board, information about the Chairman of the Management Board and his deputies, as well as biographical data sufficient to form an idea of the personal and professional qualities of the members of the Management Board (including information about age, education, qualifications, experience, information about positions held in present, and about positions held over the last 5 years in the management bodies of other legal entities) (personal data of members The boards are disclosed upon receipt of their consent to provide the specified data to third parties));
- information about the Supervisory Board (the composition of the Supervisory Board indicating the Chairman, an independent member, as well as biographical data sufficient to form an idea of the personal and professional qualities of the members of the Supervisory Board (including information about age, education, current place of work, qualifications, experience) , membership in the boards of directors of other companies, information about whether they are independent directors, as well as information about the positions they hold or have held for at least the last 5 years in the management bodies of other legal entities (personal data of members of the Supervisory Board are disclosed upon receipt of their consent to provide the specified data to third parties);
- about the loss of the status of an independent member of the Supervisory Board by a member of the Supervisory Board;
- on the composition of committees/commissions of the Supervisory Board and the Management Board, indicating the composition of the committees/commissions.

4.7.2. Information about the Bank's corporate governance system is posted on the Uzbek, Russian and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz) in the "Corporate Governance" subsection.

4.8. Composition of information voluntarily (additionally) disclosed by the Bank and methods of its disclosure

4.8.1. The Bank, on a voluntary basis, may additionally, by decision of the authorized bodies, disclose the following documents and information about its activities:

- basic principles in the field of compliance, incl. information about the anti-corruption program;
- the Bank's risk and capital management strategy;
- additional materials for the general meeting of shareholders (in addition to the mandatory information required by law) in order to provide shareholders with the opportunity to properly prepare for participation in the meeting;
- answers to typical (frequently asked) questions from clients;
- information about the main current events in the Bank, incl. in the form of press releases about the Bank's activities;



- other information (documents), including in accordance with the Charter and internal documents of the Bank, and corporate governance practices of the Bank.

4.8.2. The main way of disclosing the information specified in clause 4.8.1 is to post it on the Uzbek, Russian and English versions of the Bank's corporate website on the Internet [www.anorbank.uz](http://www.anorbank.uz) or through other communication channels provided for in clause 1.6 of this Information Policy.

## 5. COMMUNICATIONS

For the purposes of this Information Policy, communications is understood as the process of interaction of the Bank with its target audiences in the internal and external environment in order to meet the information needs of interested parties, establish relationships, form and maintain the image of the Bank.

5.1. Persons entitled to disclose information on behalf of the Bank:

5.1.1. The right to speak publicly and provide comments on behalf of the Bank belongs to the Chairman of the Board, his deputies, members of the Board, the head of the Marketing Department, and Bank employees duly authorized to perform these actions on an ongoing or one-time basis.

5.1.2. The powers of persons entitled to disclose information and provide comments on behalf of the Bank are differentiated depending on their position and professional field of activity.

5.1.3. In other cases, Bank employees are prohibited from publicly commenting or providing any information about the Bank and its activities.

5.1.4. The Chairman of the Supervisory Board, taking into account the opinions of the members of the Supervisory Board, has the right to officially comment on the decisions made by the Supervisory Board, as well as state the official point of view of the Supervisory Board on issues that were considered at its meetings.

5.1.5. Members of the Supervisory Board have the right, taking into account the obligations to comply with confidentiality requirements and non-dissemination of insider information, to publicly express their personal point of view on issues discussed at meetings of the Supervisory Board, as well as on decisions made at meetings, having previously notified the Chairman of the Supervisory Board.

5.1.7. When making external contacts, members of the Supervisory Board, members of the Management Board, and other employees of the Bank must be guided by the requirements of this Information Policy, as well as the restrictions established by the legislation of the Republic of Uzbekistan and the requirements of the Bank's internal regulatory and administrative documents regarding the disclosure of information constituting confidential or insider information of the Bank.

5.2. Communications with shareholders, investors, analysts

5.2.1. As part of increasing investment attractiveness, the Bank strives to maintain a constant direct dialogue with shareholders, investors, analysts, basing its work on the basic principles of the Bank's Corporate Governance Code, by providing additional information, explanations and official comments on the current state of affairs in the Bank, information necessary for carrying out financial analysis of the Bank's activities, making informed investment decisions.

5.2.2. To maintain effective communications with shareholders and investors, the Bank uses the following main communication channels:

- official website of the Bank on the Internet [www.anorbank.uz](http://www.anorbank.uz);
- General Meeting of Shareholders.

5.2.3. Other channels and formats of communication with shareholders, investors and analysts used by the Bank are:

- group and individual one-on-one meetings, both with the personal presence of Bank representatives and using remote channels;
- conducting excursions at special sites of the Bank;
- international investment conferences;
- audio conference calls;
- regular calls/responses to email inquiries.

5.2.4. The Bank takes all necessary actions to guarantee the implementation of the rights and legitimate interests of shareholders and other interested parties, as provided for by law, as well as the Bank's Corporate Governance Code.

5.2.5. Shareholders and investors can contact the Bank on any issue of interest to them with a written request in paper or electronic form.

5.2.6. Information for shareholders and investors, including press releases and presentations, is posted on the Russian, Uzbek and English versions of the Bank's official website on the Internet [www.anorbank.uz](http://www.anorbank.uz) in the "Shareholders and Investors" section.

### 5.3. Communications with employees

5.3.1. The Bank pursues a policy of internal information openness and ensures that Bank employees are well and equally informed about its activities, receive both internal corporate and public information in a timely manner, and constantly improve their level of knowledge about the Bank.

5.3.2. Communications with employees include regular informing of employees on issues of the Bank's activities, its development, and management decisions made, including by familiarizing themselves with the necessary regulations and organizational and administrative documents. For this we use:

- operational meetings;
- seminars, conferences;
- information reports;
- placement of internal local acts on an internal network resource;
- posting information on the Internet;
- electronic mailings;
- creation and distribution of internal corporate publications and various information materials;
- speeches by Bank managers at corporate events and in the media.

5.3.3. The Bank ensures that communications with employees cannot be used as a channel for disclosing confidential information.

### 5.4. Interaction with the media

5.4.1. The Bank strives to maintain a constant dialogue with representatives of the media and participate in various public events in order to convey information about the most significant aspects of the Bank's activities, attract attention to the Bank's products and services, maintain the image and strengthen the Bank's reputation.

5.4.2. The bank provides the media with the following information:

- about the financial and operational indicators of the Bank;
- research and analytical materials of the Bank's divisions on various financial and economic topics;
- about innovations (any information containing news, both for the media and for current and potential clients of the Bank);

- on the interaction of the Bank with various organizations;
- about the corporate life of the Bank (any information about the internal corporate life of the Bank and its employees);
- other information.

5.4.3. The Bank publishes information and advertising materials in the media and conducts various advertising campaigns through the media.

5.4.4. The main forms of communication between the Bank and the media are holding press conferences, briefings, presentations, and working with media requests for official comments from the Bank on various topics.

#### 5.5. Bank presence in social media

5.5.1. In order to maintain an ongoing informal dialogue with users of social networks (actual or potential clients of the Bank), identify their needs, provide assistance in resolving emerging issues, inform about ongoing promotions, and support its advertising applications, the Bank maintains official pages on social media.

5.5.2. Bank managers (Chairman of the Board, members of the Board, heads of departments and independent managements of the Bank may have their own pages, personal accounts (the account of the Bank's manager is considered personal, even if the profile does not indicate the current position held in the Bank and/or the Bank is not indicated as an employer ) on social media.

5.5.3. Other Bank employees may also have their own pages (personal accounts) on social networks and post materials on them containing an indication of their place of work and position held in the Bank, provide an overview of the work and provide the address of the head office.

5.5.4. When creating and maintaining personal accounts of managers and employees of the Bank, it is not permitted to publish information constituting banking, official, commercial or other secrets protected by law, materials containing confidential and/or insider information of the Bank, as well as information that does not correspond to reality and/or discredits business reputation of the Bank (including using logos, trademarks and symbols of the Bank, by posting photos and video images that do not correspond to reality).

5.5.5. Bank employees, with the exception of employees of the Marketing Department responsible for the Bank's presence on social media, cannot create pages, communities, or Bank applications on social media on behalf of the Bank, including using logos, trademarks or symbols of the Bank.

## 6. INSIDER INFORMATION

6.1. The Bank provides the necessary organizational and technical conditions for compliance with the established confidentiality regime by persons who have access to insider information.

6.2. Bank insiders have access to certain insider information of the Bank and insider information of the Bank's clients and partners (subject to simultaneous compliance with the following conditions):

- on the basis of labor and (or) civil law contracts concluded with them, as well as the laws of the Republic of Uzbekistan and internal documents of the Bank;
- only within the framework of the functions they perform, as established by the regulations on divisions, job descriptions, and internal documents of the Bank;
- subject to their inclusion in the list of Bank insiders.

6.3. The delimitation and control of access of Bank employees to insider information is carried out on the basis of internal documents of the Bank.

## 7. CONFIDENTIAL INFORMATION

7.1. Information constituting a banking, official or commercial secret of the Bank, insider information, as well as personal data are considered confidential information of the Bank.

7.2. The Bank takes measures to protect confidential information and maintain a non-disclosure regime:

- work with confidential information is carried out strictly in accordance with the requirements of the legislation of the Republic of Uzbekistan and internal documents of the Bank;

- transfer (provision, access) of personal data to third parties is carried out in accordance with the requirements of the legislation of the Republic of Uzbekistan;

- Bank employees, entering into labor relations with the Bank, undertake the obligation to not disclose confidential information of the Bank;

- Bank employees are prohibited from disclosing personal access passwords to the corporate information network, programs and work files to anyone;

- members of the Supervisory Board are obliged not to disclose or use in their personal interests or in the interests of third parties information that has become known to them and constitutes confidential information of the Bank;

- disclosure of confidential information entails liability in accordance with the internal labor regulations of the Bank and/or the legislation of the Republic of Uzbekistan.

7.3. Information constituting bank secrecy is provided only to the clients themselves or their representatives, other persons exclusively on the grounds and in the manner provided for by the legislation of the Republic of Uzbekistan.

7.4. Information constituting a commercial secret of the Bank is the property of the Bank and is not subject to disclosure, unauthorized transfer or other public disclosure in any information sources.

## 8. RESPONSIBILITY FOR DISCLOSURE

8.1. Marketing Department and supervising the Marketing Department The Deputy Chairman of the Board is responsible for the formation and implementation of a unified information policy of the Bank in order to maintain a positive image of the Bank and reduce reputational risks (in interaction with other divisions of the Bank); creation of an information system about the Bank's activities; annual informing of the Supervisory Board about the implementation of the adopted Information Policy; maintaining up-to-date content of the Uzbek, Russian and English versions of the Bank's corporate websites on the Internet [www.anorbank.uz](http://www.anorbank.uz); interaction with the media.

8.2. The Marketing, Secretariat and Treasury departments of the Bank are responsible for organizing information disclosure and interaction with the Central Bank of the Republic of Uzbekistan and the Republican Stock Exchange on information disclosure in accordance with the requirements of the legislation of the Republic of Uzbekistan on securities and the requirements of listing rules, providing documents and information to shareholders.

8.3. The requirements of this Information Policy are mandatory for all Bank employees and members of the Supervisory Board.

## 9. CONTROL OF COMPLIANCE WITH THE INFORMATION POLICY

9.1. Issues of proper organization and implementation of the Information Policy in the Bank fall within the competence of the Chairman of the Board of the Bank.

