

APPROVED

By the Decision of the Board of Directors

CJSC "Bank Kompanion"

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Chairman of the Board of Directors

Vano Baliashvili

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**INFORMATION POLICY
OF CJSC KOMPANION BANK**

Bishkek, 2025

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1. General Provisions

- 1.1.** This Policy has been developed in accordance with the applicable legislation of the Kyrgyz Republic, the Regulation "On Minimum Requirements for the Corporate Governance Code of Commercial Banks of the Kyrgyz Republic," the Charter, the Corporate Governance Code, and other internal regulatory documents of CJSC Bank Kompanion (hereinafter referred to as the "Bank").
- 1.2.** The Bank discloses information in accordance with the legislation of the Kyrgyz Republic, the regulatory legal acts of the National Bank of the Kyrgyz Republic, and the internal regulatory documents of the Bank.
- 1.3.** This Policy defines the main objectives and principles of information disclosure by the Bank, the list of information subject to disclosure, the procedure for disclosure, the level of detail, the procedure for providing access to information and documents, as well as other matters related to information disclosure.
- 1.4.** The Bank collects, processes, stores, and transfers information, including that constituting banking and commercial secrets, in compliance with the legislation of the Kyrgyz Republic.
- 1.5.** The Bank discloses information based on the principles of accessibility, regularity, timeliness, reliability, completeness, equality, balance, and security, while observing restrictions on the disclosure and distribution of information. The Bank strives to avoid a formalistic approach to disclosure and provides any material information.
- 1.6.** The Management Board of the Bank ensures oversight and coordination of the content and timing of information disclosures, as well as a proper system for document storage.
- 1.7.** The Bank's Board of Directors considers issues related to the disclosure of information that is material for making investment decisions, within its competence.
- 1.8.** The Bank's official website shall be updated as needed. The Bank shall regularly monitor the completeness and relevance of the information published on the website, including in foreign languages. For these purposes, responsible persons must be assigned to ensure the completeness and relevance of the information posted on the official website of the Bank.

2. Objectives and Goals of Information Disclosure

- 2.1** This Policy has been developed to ensure that stakeholders have access to information necessary for the transparency of Bank Kompanion's operations, as well as for making informed managerial and investment decisions.
- 2.2** The main goals of this Policy include:
 - ensuring the timely disclosure of objective, reliable, and consistent information about the Bank in accordance with the legislation of the Kyrgyz Republic;
 - providing information about the Bank to all interested parties, including clients, investors, partners, and regulatory authorities;
 - ensuring information security and the protection of Bank Kompanion's confidential information;
 - establishing principles for the disclosure of additional information to enhance the Bank's investment appeal and ensure its informational openness and transparency;
 - ensuring a unified approach to information disclosure across all divisions and employees of the Bank.

3. Categories, Methods, and Forms of Information Disclosure

- 3.1.** Information subject to disclosure is divided into three categories:
 - information that is subject to mandatory disclosure in accordance with the legislation of the Kyrgyz Republic and the internal documents of Bank Kompanion;
 - information disclosed on a voluntary basis;
 - information provided upon request by interested parties..
- 3.2.** Information disclosure within the Bank is carried out through the following methods:
 - publication on the Bank's official social media pages;
 - publication on the Bank's official website;

- placement on information boards in the Bank's branches;
- publication in mass media when necessary;
- provision of access to information upon request by interested parties, in accordance with the applicable legislation of the Kyrgyz Republic and the Bank's internal regulatory documents.

4. Mandatory Information Disclosure

- 4.1. The Bank carries out mandatory information disclosure in accordance with the requirements of the legislation of the Kyrgyz Republic, the regulatory legal acts of the National Bank of the Kyrgyz Republic, and the internal documents of Bank Kompanion.
- 4.2. The information subject to mandatory disclosure includes:
 - financial statements, including audit reports;
 - information on the composition of governance bodies;
 - data on significant corporate events that affect the Bank's operations;
 - information required to be disclosed under the regulatory requirements of supervisory authorities.
- 4.3. The Bank discloses mandatory information through:
 - the official website of the Bank;
 - specialized portals as determined by regulatory acts.
- 4.4. The mandatory information is updated within the timeframes established by the legislation and internal documents of the Bank.

5. Voluntary Information Disclosure

- 5.1. The Bank may disclose information on a voluntary basis if it contributes to enhancing the transparency of its activities and strengthening the trust of clients, partners, and investors.
- 5.2. Information subject to voluntary disclosure includes:
 - data on the Bank's initiatives and projects aimed at social development and client support;
 - analytical materials and forecasts related to the financial market;
 - publications about the achievements of the Bank and its employees;
 - interviews and comments by the Bank's representatives in the media.
- 5.3. Voluntary disclosure of information is carried out through:
 - press releases and articles in the media;
 - publications on the Bank's official website and social media pages;
 - participation in conferences, forums, and business events.
- 5.4. Decisions on voluntary information disclosure are made by the Bank's management in line with its strategic goals and corporate values.

6. Information Provided Upon Request by Interested Parties

- 6.1. The Bank ensures access to information for interested parties in accordance with the legislation of the Kyrgyz Republic and the Bank's internal regulatory documents.
- 6.2. Access to information may be provided in the following forms:
 - publication on the official website of the Bank;
 - placement on information boards in the Bank's branches;
 - provision upon official request by interested parties.
- 6.3. Requests for information are processed in accordance with the procedures established by the Bank's internal regulations.
- 6.4. Information may be withheld in cases where:
 - the requested information is confidential or constitutes bank secrecy;
 - the request does not meet the established requirements;
 - disclosure of the information contradicts the legislation of the Kyrgyz Republic.
- 6.5. Control over the provision of information is carried out by the responsible departments of the Bank.

7. Protection of Confidential Information

- 7.1. The Bank is committed to ensuring the protection of confidential information, including banking and commercial secrets, in accordance with the legislation of the Kyrgyz Republic and the Bank's internal regulatory documents.
- 7.2. Confidential information includes, but is not limited to:
 - personal data of clients and employees;
 - information on financial transactions and client accounts;
 - internal reporting and strategic documents of the Bank;
 - any other information that could harm the Bank or its clients if disclosed without authorization.
- 7.3. Disclosure of confidential information is permitted only in the following cases:
 - upon a lawful request from government authorities authorized to request such information;
 - with the written consent of the client or other interested party;
 - in cases provided for by the Bank's internal regulatory documents.
- 7.4. All Bank employees are required to adhere to the confidentiality policy and not disclose information acquired in the course of performing their duties.
- 7.5. In the event of a leak of confidential information, the Bank takes the necessary measures to mitigate the consequences and prevent such incidents in the future.

8. Final Provisions

- 8.1. This Policy shall come into effect upon its approval and shall remain in force until amended or replaced by a new version.
- 8.2. All Bank employees are personally responsible for complying with the provisions of this Policy within the scope of their duties. Non-compliance with the Policy may result in disciplinary, administrative, or other liability in accordance with the Bank's internal regulations and the legislation of the Kyrgyz Republic.
- 8.3. The implementation of the requirements of this Policy is monitored by the Board of Directors and the Management Board of the Bank.
- 8.4. In case of violations of this Policy, the Bank has the right to apply disciplinary measures in accordance with the internal regulatory documents and the legislation of the Kyrgyz Republic.
- 8.5. This Policy shall be reviewed at least once every three years or as necessary in case of changes in legislation or internal processes of the Bank.