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**Approved by**

Resolution of the Board of Directors of

Freedom Finance JSC

(Minutes No. 08/29 dated August 29, 2025)

**Effective**

from August 29, 2025

**RULES**  
**for Provision of Electronic Services**  
**through the Trading System and**  
**the Mobile Application**

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Almaty  
2025

## CHANGE CONTROL

### **1. Amendments No. 1**

approved by Resolution of the Board of Directors of Freedom Finance JSC (Minutes No. 11/07 dated November 7, 2025);

effective from November 7, 2025

### **2. Amendments No. 2**

approved by Resolution of the Board of Directors of Freedom Finance JSC (Minutes No. 01/09 dated January 9, 2026);

effective from January 9, 2026

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## Chapter 1. GENERAL PROVISIONS

1. The Rules for Provision of Electronic Services through the Trading System and the Mobile Application (hereinafter referred to as the Rules) have been developed in accordance with the Law of the Republic of Kazakhstan, On the Securities Market (hereinafter referred to as the Law on the Securities Market), and Resolution No. 27 of the Board of the National Bank of the Republic of Kazakhstan, dated January 28, 2016, On Approval of the Rules for Provision of Electronic Services by Nominee Holders, and stipulate the procedure and conditions for provision of the electronic services to clients through the Tradernet trading system and the Freedom Broker mobile application, at Freedom Finance Joint-Stock Company (hereinafter referred to as the Broker).
2. These Rules use the terms and definitions defined in the Broker's internal regulatory documents (hereinafter referred to as the internal documents), the Corporate Glossary, and the following terms and definitions:
  - 1) client authentication — a procedure for confirming the client's affiliation with the provided identifiers, carried out using one or more factors (e.g., a password, a one-time code, and etc.). Authentication is used both when logging into the trading system (including single-factor authentication) and when performing transactions, using dynamic client identification;  
*(this Clause is amended in accordance with by Resolution of the Board of Directors of Freedom Finance JSC (Minutes No. 11/07 dated November 7, 2025))*
  - 2) biometric identification - a procedure that is a part of multi-factor authentication, establishing the client's identity to confirm its rights to receive electronic services, based on its physiological and biological characteristics, taking into account the requirements of the Law of the Republic of Kazakhstan, On Personal Data and Protection;
  - 3) dynamic client identification - the procedure for establishing the client's authenticity to unambiguously confirm its rights to receive electronic services (opening a security session), using a one-time (non-recurrent) or reusable code;
  - 4) agreement - an agreement for provision of brokerage services (with nominee holding), concluded between the Broker and the client, containing the procedure and conditions for provision of electronic services to the client;
  - 5) client identification - a procedure for establishing the client's identity, carried out by the Broker, upon conclusion of the agreement, including document verification and assignment of identifiers (login, phone number, etc.) to the client.
  - 6) username (login) — the client's unique name in the trading system, provided by the trading system, for the purposes of registration in the trading system and subsequent access to electronic services through the trading system;
  - 7) client — an individual or a legal entity that has entered into a service agreement with the Broker;
  - 8) personal account — an interactive service in the Broker's trading system through which the client sends instructions to the Broker, for provision of electronic services and receives the electronic services;
  - 9) Freedom Broker mobile application or the mobile application — mobile software developed for iOS and Android mobile operating systems, functioning through the trading system, using the application programming interface (hereinafter referred to as the API) of the trading system;
  - 10) operations in the trading system - trading operations, the operations on a personal account, the information operations in the nominee holding accounting system and other operations defined by the legislation of the Republic of Kazakhstan (hereinafter referred to as the applicable legislation) and the internal documents, carried out on the basis of instructions submitted by the client in the trading system;
  - 11) password — a set of characters used to confirm identity and authority of the user and/or authorized person, when logging into the trading system;
  - 12) client connection to the Tradernet trading system — registration of the client and/or the

authorized person in the trading system, in accordance with the terms of the agreement and the Rules;

- 13) client instruction — the client's instruction to the Broker for provision of electronic services, drawn up in the form of an electronic document or other electronic digital form, verified by dynamic and/or biometric client identification;
- 14) security procedure — a set of organizational, software, and hardware measures aimed at protecting information and ensuring reliable client authentication, when creating, transmitting, and receiving instructions, including through use of dynamic identification, in order to confirm the client's rights to receive electronic services and prevent substitution, distortion, or unauthorized access to information;
- 15) security session — authorized access through multi-factor authentication of the client for conducting trading operations, the personal account operations, and/or the information operations, within a session in the personal account;
- 16) the Tradernet trading system or the trading system — a set of software and hardware tools of the Broker, including its information systems, providing information on transactions with financial instruments in the stock exchange trading system, on the transactions with foreign currency (in terms of organizing exchange operations with non-cash foreign currency) in the stock exchange trading system, the client's securities portfolio and other financial instruments, other information, as well as the provision of the electronic services to the client;
- 17) stock exchange trading system — a set of material and technical means, the internal documents of the stock exchange, and other necessary assets and procedures used to conclude transactions with equity securities and other financial instruments between the members of this stock exchange;
- 18) electronic services — the services provided by the Broker to the Client through the Broker's trading system or the mobile application, for trading, personal account transactions, and/or the information transactions, as well as other services provided by the Broker, in accordance with the applicable legislation and the Rules.

## Chapter 2. LIST OF ELECTRONIC SERVICES

3. The Broker's trading system provides electronic services through use of a personal account, accessible via a web version and a mobile application.
4. A demo version with training is available for familiarization with the system's functionality.
5. The web version of the trading system is accessible via a browser, does not require installation of additional software, and is provided free of charge.
6. The mobile application is installed on users' mobile devices through official app stores corresponding to the device's operating system.
7. The Broker's trading system provides the client with the following electronic services:
  - 1) Information operations in the nominal holding accounting system:
    - Issuing a client statement of account: the client may obtain a statement at any time by submitting a corresponding request through the trading system interface. The document is generated in the trading system in PDF format and contains up-to-date information about assets in the client account;
    - Issuing a transaction report: the report is generated upon the client's request, and has an option to designate the period of interest. The report contains detailed information about all transactions completed during the designated period;
    - Compiling and issuing reports upon the request of securities holders (including audit reports, reports and statements from depositories, account opening notices), as well as upon the request of the central depository, issuers, and the competent authority;

*(this Clause is amended in accordance with by Resolution of the Board of Directors of Freedom Finance JSC (Minutes No. 01/09 dated January 9, 2026))*

2) Personal account operations:

- funds management: withdrawals, transfers between accounts, confirmation of the source of funds. Execution of an application is carried out by submitting orders in the trading system;
- personal data management: W-8BEN form submission, phone number change, email change, postal address change, information change, and economic profile change. Submission of orders to change information in the trading system personal account, including updating contact information, changing identity document details, changing bank details, etc. Orders are processed within three (3) business days by the Broker employees;
- account settings management: document ordering, order cancellation, account closure. The order is received for processing and accepted by the Broker employees.
- security settings management: authentication management, voice password management, and Telegram link management. Configuration change requests are executed by submitting orders in the trading system;
- write-off (crediting) of rights of claim for the issuer's obligations under securities from/ to the client's personal account. The order is processed and accepted by the Broker employee;

3) Trading operations:

- trading order management: creating a transaction register, acquisition of securities, purchasing shares at the IPO price. Execution of an application is carried out by submitting orders in the trading system;
- purchase or sale of a financial instrument, carried out through the trading system on the securities market. A purchase or sale order is executed by submitting an order/instruction to buy/sell securities.

8. The Broker performs the operations stipulated by Clause 7 of the Rules, based on the client's orders submitted through the personal account in the trading system.

9. When a client submits an order, the trading system generates a corresponding client order, the content of which includes the details established by the applicable legislation, the Regulations on Brokerage and Dealer Activities; (hereinafter referred to as the Regulations), and the internal documents.

### **Chapter 3. PROVISION OF ELECTRONIC SERVICES**

10. The Broker provides electronic services to individuals and legal entities, taking into account the requirements of the applicable legislation.

### **Chapter 4. PROCEDURE FOR GRANTING ACCESS TO THE TRADING SYSTEM**

11. The Broker complies with the requirements established by the applicable legislation, regarding the procedure and conditions for concluding transactions with financial instruments.

12. The client access to electronic services (brokerage and/or nominee holding) is possible after concluding an agreement and completing the client registration procedure in the trading system.

13. The procedure and conditions for concluding an agreement between the client and the Broker are determined in accordance with the Regulations.

14. The Broker, at its discretion, has the right to provide the opportunity to conclude an agreement by the client signing an application to accede to the agreement/contract remotely using electronic resources, in the manner established by the Regulations.

15. To operate:

- 1) with the web version of the trading system, the client shall independently ensure availability of software and hardware, consisting of a personal computer running one of the following operating systems: MS Windows, Linux, MacOS; an internet browser and an internet connection;
- 2) with a mobile application, the client shall have a mobile device running one of the following operating systems: iOS or Android, and Internet connection.

16. The Broker's trading system provides for:

- 1) security of changing data and client searches, including using previous data; integrity of information on all trading operations, the personal account operations, and/or the information operations for the entire period, even if the client's last name, first name, patronymic (if any), or full name changes;
- 2) search for information, based on an individual request and any criteria, saving the request, as well as sorting information by any parameters and the ability to view the information for previous dates;
- 3) processing and storage of information on all operations by date, without abbreviations.

17. Other additional services for existing and/or potential clients may be developed as part of the electronic services, based on the trading system. Information about additional and/or added capabilities and services to the trading system functionality is posted by the Broker on the Broker's official website [www.almaty-ffin.kz](http://www.almaty-ffin.kz).

18. The client shall complete instructions (orders/client orders, other instructions), in accordance with the requirements contained in the internal documents, while the responsibility, including possible losses and damages caused by incorrect execution of instructions, rests with the client.

19. Acceptance/refusal of orders from Clients and execution of such orders are carried out by the Broker, in accordance with the applicable legislation, the Regulations, and the Rules. The Broker may refuse to accept orders, in cases stipulated by the applicable legislation, and/or in other cases stipulated by the Regulations and the Rules.

## **Chapter 5. PROCEDURE AND CONDITIONS FOR CLIENT IDENTIFICATION AND AUTHENTICATION**

20. The client identification in the trading system and the mobile application is accomplished through use of unique identifiers (login, email address, or mobile phone number) provided by the client upon conclusion of the agreement, followed by authentication.

21. If the client correctly enters its login (or email address) and a password, and completes the authentication procedure, the client gain access to its personal account in the trading system or the mobile application. To obtain the right to conduct trading operations, the personal account operations, and the information operations, the client shall complete the dynamic client identification procedure which includes confirmation, using a one-time code, as part of a security session.

22. To access the trading system/mobile application, the client shall have:

- 1) a username (login)/email address, a password for accessing the trading system set by the client, and the mobile device number;
- 2) if the client loses its password for accessing the trading system, the client can recover it through the password recovery procedure, using its login, email address, or the client code, and receive a password reset code via email or a mobile device.

23. The client identification in the trading system is carried out based on the identifiers previously assigned to the client, during registration conducted at the Broker's office, upon conclusion of the agreement.

24. The client authentication in the trading system involves verifying its identity, using one or more

factors: a password, a one-time code, etc.

*(this Clause is amended in accordance with by Resolution of the Board of Directors of Freedom Finance JSC (Minutes No. 11/07 dated November 7, 2025))*

25. When the Broker provides electronic services, clients may only conduct trading, personal account operations, and the information operations, based on an order confirmed using dynamic client identification which includes the following:
  - 1) preliminary client authentication upon logging into the trading system (e.g., entering a username and a password, or phone number, confirmed by entering a one-time code);
  - 2) additional dynamic client identification, prior to conducting operations, within a security session aimed at establishing the client's authenticity for each operation. Use of local biometric identification mechanisms is permitted as additional security enhancement, but does not replace client identity verification for the purpose of order confirmation.
26. The electronic services described in Clause 7 of the Rules are provided by the Broker to the client remotely through the personal account in the trading system, after completing the identification and authentication procedures, by providing access to the web version of the trading system or through the trading system's mobile application via secure internet communication channels.

## **Chapter 6. BLOCKING/ SUSPENSION OF PROVISION OF ELECTRONIC SERVICES**

27. The Broker suspends provision of electronic services, if the client submits a corresponding instruction through the personal account in the trading system.
28. The Broker will block provision of electronic services within 15 (fifteen) minutes of the client's request and identification.
29. If electronic services are blocked, the Broker's trading system will notify the client, stating the reason.
30. When executing a trading operation or the operation on a personal account, the Broker's trading system notifies the client about refusal to execute these operations on the grounds stipulated by the Law on the Securities Market, including if the following conditions are met:
  - 1) the number of securities to be debited from the personal account exceeds the number of the securities on that account;
  - 2) the amount of funds on the client's account is insufficient to execute the trading operation;
  - 3) the securities to be debited are encumbered and/or blocked.
31. To unblock a client-initiated block, the client shall be present in person, at the Broker's office.

## **Chapter 7. SECURITY PROCEDURES**

32. The security procedures enable reliable identification of the client and its eligibility to receive electronic services, identify any distortions and/or changes in the content of electronic documents, on the basis of which the client is provided with the electronic services, ensure protection against unauthorized access to information constituting a commercial or other legally protected secret, and ensure integrity of this information.
33. To protect information, the Broker ensures backup copies of the database, including information on client operations and the system transaction log, are stored on an additional server, including through the service provider under the subscription service (support) agreement.
34. To access the trading system or the mobile application, the client enters a login (email address or phone number) and a password set by it. Data are transferred via a secure SSL protocol, using cryptographic protection methods. After successful verification of the entered data, the client gains access to its personal account, where it can perform information operations.
35. To open a security session, the client initiates the corresponding request in its personal account in the web version or the mobile application of the trading system. Opening a security session is

carried out using the dynamic client identification procedure, with the possible use of biometric identification. After successfully completing the procedure, the client is able to submit orders to execute operations. The trading system provides three (3) main methods for opening a security session:

- 1) in the mobile application - using dynamic identification (entering a one-time code received via SMS or push notification), in addition to biometric identification;
- 2) in the web version - by scanning a QR code displayed on the screen through the mobile application. Preliminary client confirmation in the mobile application is also performed using dynamic identification (confirmation code via SMS or push notification) and, if available, biometric identification;
- 3) an order to execute operations can be generated by the Broker's manager, based on the client's request. In this case, the trading system sends the client a confirmation code to complete the dynamic identification procedure. The client signs the order in the web version or the mobile app of the trading system by entering the received one-time code delivered via SMS or push notification to the mobile device number registered in the trading system.

36. A security session is considered open after all required authentication steps have been completed. After opening a security session, the client can perform account operations and the trade operations, in accordance with Clause 7 of the Rules.

37. To ensure confidentiality of transmitted and received information, the trading system uses traffic encryption, using the secure TLS 1.3 protocol and a PKCS #1 SHA-256 certificate with the RSA encryption algorithm. Before sending over the Internet, the client data are converted into an encrypted format, ensuring protection of information throughout the entire path between the trading system and the client's device.

38. The trading system has a feature that automatically terminates the client's security session, if the client logs out of its personal account. The client is advised not to leave a personal computer or a mobile device with an active security session unattended to prevent unauthorized access to electronic services.

39. The Client shall not disclose or transfer, to the third parties, the username (login) or the password for accessing the trading system. The username (login) and the password for accessing the trading system shall be stored in conditions that prevent access by unauthorized persons. The client assumes all risks associated with failure to ensure security of the above information/equipment.

40. To confirm the information specified in the Client's order, the Broker's manager will contact the Client by telephone to clarify the information necessary for executing the order. As part of the client verification process for remote order submission, dynamic client identification is used, including dynamic confirmation, using a one-time code sent to the registered number of the client's mobile device.

41. To protect against the third-party access to the trading system, the client is advised to set passwords that meet the following minimum requirements:

- 1) a password should not contain the user account name or any part thereof;
- 2) a password should be at least 8 (eight) characters long;
- 3) a password should contain characters from 3 (three) categories out of the following four:
  - uppercase English letters, from A to Z;
  - letters of the English alphabet, from a to z;
  - decimal digits (0 to 9);
  - non-alphabetic characters (e.g., !, \$, #, %).

42. After five (5) unsuccessful authentication attempts, the account will be automatically blocked by the trading system for one (1) hour.

43. If an attempt to log in from the same IP address, using different logins is made, the account will be automatically blocked by the trading system for twenty-four (24) hours.

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44. If there is a suspicion of compromise by the trading system, the password is automatically reset, requiring a change to be made before re-entering.
45. The trading system does not provide for, as follows:
  - 1) presence of means that could compromise integrity of data in the trading system;
  - 2) presence of functions that allow direct changes to already generated output reports;
  - 3) modification (deletion) of data on completed operations and the status of personal accounts, with the exception of the operations (functions) specifically designated for this purpose.
  - 4) formatting (modifying) output forms, including client orders, the client instructions, the client operation reports, and the client account statements.

## **Chapter 8. FINAL PROVISIONS**

46. For questions related to provision of electronic services, the client may contact the address and contact information posted on the website [www.almaty-ffin.kz](http://www.almaty-ffin.kz) in the Contacts section.
47. The Broker reserves the right to unilaterally change contact information with prior notification of such changes to the client, on the official website: [www.almaty-ffin.kz](http://www.almaty-ffin.kz).
48. The Broker reserves the right to unilaterally amend and supplement the Rules with subsequent posting on the official website [www.almaty-ffin.kz](http://www.almaty-ffin.kz).
49. The unit responsible for communication with the contractor providing the entire range of services under the subscription service (support) agreement is the information technology unit.
50. Other issues not regulated by the Rules are resolved in accordance with the applicable legislation, the internal documents, the agreement, and customary business practices.