

Approved by

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of Freedom Finance JSC
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RULES
for provision of electronic services through
the Tradernet trading system and the mobile
application

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Chapter 1. GENERAL PROVISIONS

1. These Rules for Provision of Electronic Services through the Tradernet Trading System and the Mobile Application of Freedom Finance Joint-Stock Company (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), the Law of the Republic of Kazakhstan, On Electronic Documents and Electronic Digital Signatures (hereinafter referred to as the Law on EDEDS), 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 provide for the procedure and conditions for the provision of electronic services to clients through the Tradernet trading system and the mobile application in the Freedom Finance Joint-Stock Company (hereinafter referred to as the Broker).
2. The following terms and definitions are used in the Rules:
 - 1) authentication – confirmation of the client’s identity, authenticity and correctness of the electronic document by using the security procedure established by the Broker;
 - 2) biometric identification - a procedure for establishing the identity of a client, in order to unambiguously 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 - a procedure for establishing authenticity of a client, in order to unambiguously confirm its rights to receive electronic services by using a one-time (non-recurrent) or reusable code;
 - 4) Agreement — an agreement on provision of brokerage services (with nominal holding), concluded between the Broker and the client, containing the procedure and conditions for the provision of electronic services to the client;
 - 5) user name (login) – a unique name of the client 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;
 - 6) client – an individual or a legal entity that has entered into an agreement with the Broker and has completed the registration procedure in the trading system;
 - 7) 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, receives the electronic services;
 - 8) multifactor authentication — a method of access control to an information resource that requires more than one mechanism for confirming the identity. In addition to entering a login and a password, it is necessary to confirm the identity, using a one-time password, a QR code, biometrics, a Web-Token and (or) other similar technologies;
 - 9) Tradernet mobile application – a mobile software developed for iOS and Android mobile operating systems, operating through the trading system, using the application programming interface (hereinafter referred to as the API) of the trading system;
 - 10) password – a set of characters intended to confirm the identity and authority of a user and/or an authorized person, when logging into the trading system;
 - 11) connecting the client to the Tradernet trading system – registration of a user and/or an authorized person in the trading system, in accordance with the terms of the Agreement and these Rules;
 - 12) client order – a 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, certified by means of dynamic client identification;

- 13) security procedure – a set of organizational measures and software and hardware means of information protection, designed to identify the client, when drawing up, transmitting and receiving its instructions, in order to establish its right to receive electronic services and to detect errors and (or) changes in the content of the client’s transmitted and received instructions;
- 14) electronic digital signature tools – a set of software and technical tools used to create and verify the authenticity of an electronic digital signature;
- 15) Tradernet trading system or the trading system - a set of software and hardware of the Broker, including its information systems, providing for receipt of information on transactions with financial instruments in the stock exchange trading system, on the transactions with foreign currency (in terms of organizing exchange transactions 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 provision of electronic services to the client;
- 16) trading session — authorized access through multi-factor client identification to conduct trading operations, within a session in a personal account or a mobile application;
- 17) stock exchange trading system - a set of material and technical resources, internal documents of the stock exchange and other necessary assets and procedures, using which transactions with securities and other financial instruments are concluded between members of the given stock exchange;
- 18) electronic digital signature (hereinafter referred to as the EDS) - a set of electronic digital symbols created by means of an electronic digital signature and confirming authenticity of an electronic document, its ownership and immutability of its content;
- 19) electronic services – services provided by the Broker to the client through the trading system or the Broker’s mobile application for implementation of trading operations, the operations on a personal account and (or) information operations, as well as other services provided by the Broker, in accordance with the legislation of the Republic of Kazakhstan and these Rules.

Chapter 2. LIST OF ELECTRONIC SERVICES

3. The Broker's trading system provides electronic services through use of a personal account, as well as the possibility of training in a demo version. The browser version of the trading system does not require additional installations and is provided free of charge. The mobile application is installed on electronic communication devices, using an application store for mobile devices.
4. The Broker's trading system provides the client with the opportunity to perform the following operations:
 - 1) information operations in the nominal holding accounting system:
 - issuing statements from the client's personal account;
 - issuance of a report on the operations performed;
 - preparation and issuance of other reports at the client’s request;
 - 2) personal account operations:
 - opening a personal account;

- change of information about the client (rights of claim for the issuer's emission securities obligations);
 - writing-off (crediting) of rights of claim for the issuer's emission securities obligations, from (to) the client's personal account (accounts);
 - encumbrance of securities (rights of claim for the issuer's emission securities obligations) and removal of the encumbrance;
- 3) trading operations:
- purchase or sale of a financial instrument, carried out through a trading system on the securities market;
- 4) other operations determined by the applicable law and the Broker's internal documents.
5. The Client carries out the operations stipulated by Clause 4 of these Rules, based on his/her instructions submitted through the personal account in the trading system or through the mobile application. When submitting the Client's instruction, the trading system generates the corresponding Client order/instruction, the content of which includes the details established by the legislation of the Republic of Kazakhstan, the Regulations on brokerage and dealer activities (hereinafter referred to as the Regulations) and the internal documents of the Broker.

Chapter 3. PROCEDURE FOR PROVIDING ELECTRONIC SERVICES

6. The Broker complies with the requirements established by the applicable legislation regarding the procedure and conditions for making transactions with financial instruments.
7. The electronic services are provided by the Broker to the client remotely, by providing access to the trading system or through a mobile application via secure communication channels over the Internet.
8. For work:
- 1) with 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 the Internet connection;
 - 2) with a mobile application, the client shall independently ensure that they have a mobile phone running one of the following operating systems: iOS, Android, and the Internet connection.
9. The client's access to electronic services (brokerage and/or nominal holding) is possible after concluding the Agreement and completing the client's registration procedure in the trading system.
10. The procedure and conditions for concluding the Agreement between the client and the Broker are determined in accordance with the Regulations.
11. The Broker, at its own discretion, has the right to provide the opportunity to conclude the Agreement by means of the Client signing the Statement of Accession to the Agreement/Agreement remotely, using electronic resources, in the manner established by the Regulations.
12. The electronic services are provided by the Broker to the client through the client's personal account in the trading system. Transactions in the trading system and the personal account are possible subject to identification and authentication of the client in the personal account. Login to the trading system and the personal account occurs through multi-factor authentication of the client.

13. When the Broker provides electronic services to the client, trading operations, the personal account operations and the information operations are carried out on the basis of the client's instructions, using multi-factor authentication of the client.
14. The Broker's trading system provides for, as follows:
 - 1) preservation of mutable data and search for a client, including using the previous data, preservation of information on all trading operations, the operations on a personal account and (or) the information operations for the entire period, when changing the last name, the first name, the patronymic (if any) or full name of the client;
 - 2) search for information, based on an individual request and any criteria, with saving the request, as well as sorting information by any parameters and the ability to view information for the previous dates;
 - 3) processing and storing information on all transactions by dates, without abbreviations.
15. Within the framework of electronic services, based on the trading system, other additional services may be developed for existing and (or) potential clients. Information on additional and (or) added to the functionality of the trading system capabilities and services is posted by the Broker on the official website of the Broker, www.almaty-ffin.kz.
16. The Client shall fill out instructions (orders/client orders, other instructions), in accordance with the requirements contained in the Broker's internal documents, while a responsibility, including possible losses and damage caused for incorrect execution of the instructions, is assigned to the Client.
17. Acceptance of orders/refusal to accept the orders from clients, implementation of actions for execution is carried out by the Broker, in accordance with the applicable legislation, the Regulations, and these Rules. The Broker may refuse to accept orders, in cases stipulated by the applicable legislation and (or) in other cases stipulated by the Regulations, these Rules.
18. The unit responsible for communication with the contractor providing a set of services under the subscription service (support) agreement is the Information Technology Department.

Chapter 4. PROCEDURE AND CONDITIONS OF IDENTIFICATION IN A TRADING SYSTEM AND A MOBILE APPLICATION

19. The client identification is carried out:
 - 1) in the trading system: on the Internet, at the following web address: tradernet.kz, by the client entering in the appropriate window of the trading system the appropriate user name (login) or email, a password for entering the trading system or a mobile phone number;
 - 2) in a mobile application: by the client entering in the appropriate window of the mobile application the appropriate email address, a password for logging into the trading system or a mobile phone number.
20. The Broker establishes business relations remotely exclusively with the clients who meet the following requirements:
 - 1) an individual or a legal entity that has been assigned with an identification number, in accordance with the legislation of the Republic of Kazakhstan;
 - 2) a client (its representative) and a beneficial owner are not persons included in the list of organizations and the persons associated with financing of terrorism and extremism;
 - 3) a client (its representative) and a beneficial owner are not designated persons or organizations subject to international sanctions (embargo), in accordance with resolutions of the United Nations Security Council;

- 4) a client is not a person who has been assigned with a risk level that requires application of enhanced due diligence measures, in accordance with Clause 7 of Article 5 of the Money Laundering and Terrorist Financing Prevention Act and the Broker's Rules on Internal Control for Anti-Money Laundering, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction.
21. The Broker, independently, makes a decision on remote establishment of business relations with clients, based on an assessment of the degree of risk associated with money laundering and terrorist financing (MLTF). The assessment includes an analysis of the type of the client, a country (geographical) risk, as well as the risk associated with the service (product) and (or) the method of provision, in accordance with the requirements of the Resolution No. 111 of the National Bank of the Republic of Kazakhstan and the Broker's internal document regulating the assessment of the MLTF risks.
22. If a user name (login), a password for entering the trading system/ mobile application and (or) a mobile phone number are correctly specified and multi-factor authentication is passed, the client's identification in the trading system/mobile application is considered to have been properly completed, after which the client gains access to the personal account, the ability to view account information, and the ability to open a trading session, using multi-factor authentication.
23. To enter the trading system/mobile application, the client shall have:
 - 1) a username (login)/email, a password for entering the trading system, which the client has set, and a mobile phone number;
 - 2) in case of loss of the password for entering the trading system, the client can restore it by means of the password recovery procedure, knowing the login, an email address or a client code, having received the password reset code to the email address or the mobile phone.

Chapter 5. BLOCKING/SUSPENSION OF PROVISION OF ELECTRONIC SERVICES

24. The Broker blocks the client's access to the trading system (suspends provision of electronic services) and the mobile application, if the client submits a corresponding instruction through the personal account of the trading system.
25. Blocking access to the trading system is carried out by the Broker, within 15 (fifteen) minutes from the moment the client applies and is identified.
26. In case of blocking access, the Broker's trading system issues a notification to the client, indicating the reason.
27. When performing a trading operation, the operation on a personal account, the Broker's trading system issues the client a notification of refusal to perform these operations on the grounds provided for by the Law on the Securities Market, including upon occurrence of the following conditions:
 - 1) the number of securities to be written off from the personal account exceeds the number of the securities in the given account;
 - 2) the amount of funds on the client's account is insufficient to complete a trading transaction;
 - 3) securities subject to writing-off are encumbered and/or blocked.

Chapter 6. SAFETY PROCEDURES

28. Security procedures allow for reliable identification of the client and his/her right to receive electronic services, to identify the presence of distortions and/or changes in the content of electronic documents, on the basis of which the electronic services are provided to the client, to ensure protection against unauthorized access to information constituting a commercial or other secret protected by law, and to ensure integrity of this information.
29. In order to protect information, the Broker ensures backup of the database, including the information on the client transactions and the system transaction log, on an additional server, including with involvement of a service provider, under a subscription service (support) agreement.
30. In order to identify the client, when accessing the trading system/mobile application, the client enters the login and password created by it. The data is transferred to the trading system via a secure SSL protocol, using appropriate encryption methods. If the login and password match, the client gets access to the personal account in viewing mode.
31. To open a trading session, the client initiates opening of a trading session in the personal account of the trading system/mobile application by sending a corresponding request, selecting the multi-factor authentication method. After that, the client will be given the opportunity to submit orders to perform trading operations.
32. In order to ensure confidentiality of the transmitted and received information, the trading system uses SSL encryption, the TLS 1.3 protocol, the PKCS #1 SHA-256 certificate with the RSA encryption. The encryption converts the client's data in the trading system into the encrypted code, before sending it over the Internet and ensures the confidentiality of the client's information on the way between the trading system and the client's Internet browser.
33. For security purposes, the trading system has a function for disabling the client's trading session in the trading system. Disabling the current client session in the trading system means refusing to provide electronic services, in the event of logging out of the personal account or closing the Internet browser or the mobile application. It is not recommended to leave a personal computer or a mobile device with the current session, in the absence of the client.
34. The Client has no right to disclose/transfer to the third parties the user name (login), the password for entering the trading system. The user name (login) and the password for entering the trading system shall be stored in conditions that exclude access to them by the unauthorized persons. The Client assumes all risks associated with its failure to ensure the conditions for the safety of the above information/equipment.
35. In order to confirm the data specified in the order, the Broker's manager receives/clarifies the necessary information related to execution of the client's order via telephone. Multi-factor authentication is used for the purposes of client verification, in the event of an order being submitted.
36. In order to protect against the third party access to the trading system, the client is recommended to set passwords that meet the following minimum requirements:
 - 1) a password cannot contain the user account name or any part of it;
 - 2) a password shall be at least 8 (eight) characters long;
 - 3) a password shall contain characters of 3 (three) categories from the following four ones:
 - capital letters of the English alphabet, from A to Z;
 - letters of the English alphabet, from a to z;

- decimal digits (from 0 to 9);
non-alphabetic characters (e.g., !, \$, #, %).
37. The trading system does not provide for:
- 1) the presence of means that allow integrity of data in the trading system to be violated;
 - 2) the presence of functions that allow to directly make changes to already generated output reports;
 - 3) changing (deleting) data on completed transactions and the status of personal accounts, with the exception of the transactions (functions) specifically designated for this purpose;
 - 4) formatting (changing) output forms, including a client order, a client instruction, a report on the client's completed transactions, and a statement from the client's personal account.
38. The Broker's internal documents contain the necessary procedures to prevent use of existing or introduced methods and technologies for provision of electronic services in schemes for money laundering and terrorist financing.

Chapter 7. FINAL PROVISIONS

39. For questions related to provision of the electronic services, the client can contact, using the following information: Almaty, 77/7 Al-Farabi Ave., Non-Residential Facility 3a, tel.: +7 (727) 311 10 64/65.
40. The Broker has the right to unilaterally change the contact information, with prior notification of the client about such changes, on the following official website: www.almaty-ffin.kz.
41. The Broker has the right to unilaterally make amendments to these Rules, with subsequent posting them on the following official Internet resource: www.almaty-ffin.kz, no later than 15 (fifteen) calendar days from the date of introduction into effect.
42. Other issues not regulated by these Rules shall be resolved in accordance with the current legislation of the Republic of Kazakhstan, the Broker's internal documents, the Agreement and good business practices.