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**“Approved” by**  
**Board of Directors of**  
**JSC “Astana medical university”**  
**No. 2, March 12, 2012**

## **Instruction on the protection of commercial and official secrets of the joint-stock company “Astana Medical University”**

### **1. General provisions**

1. This Instruction on the protection of commercial and official secrets of the joint-stock company “Astana Medical University” (hereinafter – Instruction) was developed in accordance with Civil Code, other regulatory acts of the Republic of Kazakhstan and establishes common norms on the data considered as commercial and secrets of JSC “Astana Medical University” (hereinafter – Company) as well as measures aimed at protecting them from illegal disclosure.


2. Data connected with governance, financial issues, technological information and other activities having actual and potential commercial value by virtue of non-public nature are recognized as commercial or official secret of the Company. There is no free access to them on legal grounds and disclosure can prejudice interests of the Company.

The list of data considered as commercial and official secret is stipulated in an appendix to this Instruction and this is its essential part.

3. The data that is no commercial and official secret:

- 1) Constitutional documents of the Company;
- 2) Data on vacant positions, their number and categories;
- 3) Information on issued securities and their holders subject to be disclosed in accordance with the legislation of the Republic of Kazakhstan on security market;
- 4) Data on the Company’s affiliated persons;
- 5) Other data the free access to which is stipulated by regulatory acts of the Republic of Kazakhstan, charter and other internal

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documents of the Company.

The content of the information subject to the compulsory publication or compulsory promulgation to the Sole Shareholder of the Company is established by the Regulation on the information policy of the Company.

4. Commercial and service secret protection means prohibition to disclose the indicated data among specific or unspecific group of persons who have no access to commercial or official secrets in any accessible form for perception.

The documents, decisions or sources of information affecting the rights and interests of citizens can be known to persons whose rights and interests are affected as well persons who have the right for access to such kind of information.

5. Privacy mark “Confidential” is put on the documents, files and publications containing commercial secret in order to prevent the access of unauthorized persons, and the mark “For official use” or “FOU” is put on the documents containing an official secret.

When carrying trade-economic, scientific-technical, currency-financial and other commercial relations as well as with foreign partners, the Company stipulates the terms on confidentiality preservation in the contracts concluded or signs other contract establishing the nature and data content having commercial secret as well as mutual obligations on ensuring its preservation in accordance with the legislation.


6. The necessity for submission, open publication of data containing commercial and/or official secret of the Company, their volume; the form and time of publication (submission) is determined by the Board Chairman – the Company’s Rector.

7. Use of the data for open publication accepted on contractual or discretionary basis or use of the data that are the result of joint activity is allowed only by common consent of partners.

## 2. Access to the commercial and official secret information of the Company

8. The Sole Shareholder, members of the Board of Directors, Board Chairman – Rector, Vice-rectors, Corporate Secretary, Internal audit service workers, chiefs of structural units and a worker of the cadre work and records management department who is responsible for the records management and secret work providing the organization of the work with the documents indicated have an access to the data containing commercial and official secrets.

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Other workers of the Company have an access to the data and documents having commercial and official secrets only in the extent necessary for them to execute their official duties.

The worker responsible for the records management and secret work is obliged to list the Company’s workers who have an access to the information containing commercial or official secrets of the Company.

9. The access of the Company’s worker to the data containing commercial or official secrets of the Company is given after signing the document on non-disclosure of these data that is an essential part of the Labor contract.

By virtue of his official obligations, the worker have an access to the data containing commercial or official secrets of the Company as well as the worker who will be confided with such data must be acquainted with this Instruction by the cadre work and records management department of the Company.

10. The documents containing commercial or official secrets of the Company are stored in the Company’s structural units whose competence includes the information reflected in these documents.


Affording an access to the commercial and/or official secret stored in one structural unit to a worker of another structural unit is carried out upon authorization of the chief of latter unit.

11. The workers who accepted the access to the data containing commercial or official secrets bear personal responsibility for the commitment to the established procedure of managing, applying, distributing, storing and destructing the documents containing commercial or official secrets in accordance with the current legislation, this Instruction and conditions of the Labor contract.

12. Since the day of employment and till the expiration of five years since the moment of dissolution of the labor contract, the worker must bosom the data containing commercial or official secrets that became familiar to him during employment and must suppress the acts of other persons that can lead to the disclosure of such data.

13. The workers of other companies can be allowed to be acquainted and to work with documents containing commercial or official secrets of the Company in the case of availability of a contract and/or an agreement on the confidentiality between these organizations and the Company, the availability of the grounded written request of those organizations where they work indicating the theme of the executed task or name, patronymic and surname of the worker.

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### 3. Provision of documents preservation Checking their availability

14. The documents containing commercial or official secrets of the Company must be stored in official premises in a secure, locked security box, metal locker (box) providing for their physical preservation.

15. Computers with the data containing commercial and/or official secret must be protected with a keyword in an obligatory order.

16. Originals and copies of documents containing commercial and/or official secret may be stored by an executer under his personal responsibility during the term needed for completing a task upon the condition of full provision for their preservation.

17. It is prohibited for workers to leave originals or copies of documents containing commercial and/or official secret on the desktop, network printer or Xerox.

18. Chief of a structural unit or a worker of the cadre work and records management department responsible for the documents management and secret work is brought to the notice on the loss of documents containing commercial and/or official secret or on the disclosure of data found in them. Herewith, the persons indicated must be informed on the cases of the loss of documents.

19. A commission may be formed by the order of the Board Chairman – Rector for the internal investigation of the loss of documents containing commercial and/or official secrets or the disclosure of data found in these materials. The materials collected by the commission during the investigation of such facts and the conclusion of the commission (act) on the results of the investigation are the grounds for bringing perpetrators to the responsibility set by legislation.


20. The procedure of accepting, managing and working with documents having the marks “Confidentially”, “For official use” or “FOU” is carried out in compliance with the Instruction on records management of the Company.

Testing the presence of such documents is conducted by a worker of the cadre work and records management department responsible for the document management and secret work at least once a year.

### 4. Limitations connected with the use of the data containing commercial secrets

21. The workers having the access to commercial or official secrets of the Company are obliged:

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- 1) To keep a commercial and official secret which became known to him due to their work done;
- 2) To execute the requirements of this Instruction, other regulations, orders on the provision for the preservation of commercial and official secrets;
- 3) Not to use the knowledge of a commercial and/or official secret in order to be engaged in an activity that in the result of a competitive action can be detrimental to the Company.

22. Workers are prohibited:


- 1) To have conversations concerning the content of a commercial and/or official secret of the Company in the presence of outsiders or workers of the Company whose competence does not include these matters;
- 2) To use the data containing commercial and official secrets in documents, articles to be published in public sources, interventions, interview, etc. without appropriate direction or permission of the administration.
- 3) To put into writing the data a containing commercial secret in applications on personal matters, complaints, requests;
- 4) To make notes, calculations, etc. disclosing a commercial secret in personal notebooks, memo books, personal computers;
- 5) To copy the documents containing a commercial and/or official secret without appropriate permission;
- 6) To accumulate in desktops the documents unnecessary for work, containing a commercial and/or official secret;
- 7) To carry away from premises, offices the documents containing a commercial and/or official secret without permission of the Company’s administrators supervising structural units;
- 8) To post the data of documents and publications with the marks “Confidentially”, “For official use” or “FOU” and other documents containing a commercial and/or official secret on global and local information nets;

## 5. Liability

23. In the event of disclosure or illegal use of a commercial or official secret, the worker bears disciplinary, civil-legal or other liability established by the legislation of the Republic of Kazakhstan.

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Appendix to the Instruction on the protection of commercial and official secrets of JSC “Astana medical university”

### **The list of the data containing an official or commercial secret of JSC “Astana medical university”**

1. The commercial secret of JSC “Astana medical university” (hereinafter – Company) includes:

- 1) The data on the preparation, acceptance or execution by the Company’s administration and bodies of particular decisions on operational, commercial, organizational and other matters (decisions of the bodies and officials of the Company and other materials and documents coming out from them );
- 2) The data on the Company’s Development strategy;
- 3) The data on the investment plans, market launch of new products, commodities and services that have not been officially announced yet;
- 4) The information on the directions of market researches and the results of market researches containing the assessment of the condition and prosperity of the market environment development;
- 5) Content of primary documents, including:
  - Bank documents (bank operation accounts);
  - Cash documents (capitalization and expenditure of funds and cash balances);
  - Information on salary accounting for the Company’s workers in the amount of financial assistance, premiums;
- 6) Content of accounting register;
- 7) Content of internal accounting reports;
- 8) The data on the current and other accounts set up in credit agencies or other financial organizations as well as in a foreign currency, on the account activity and on the credit balances, the data on the current deposits in banks as well as in a foreign currency;
- 9) Financial documents:
  - Content of the Company’s budget and the budget of its subsidiaries (if there are);
  - Content of the Development plans (plans of financial and economic activity) of


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the Company and of its subsidiaries (if there are);

- Calculations with partners, information on debtor and credit indebtedness of the Company and its subsidiaries (if there are);
- Plans and reports of the work of the Company’s Internal audit service (as well as quarter and annual);
- Audit reports and conclusions on the Company and its subsidiaries (if there are);
- 10) Preparation of proposals for the Company’s participation in procurements by requesting price quotations;
- 11) Tender offers of the Company before disclosing them to prospective suppliers in accordance with the established procedure;
- 12) The data on domestic and foreign contractors, suppliers, counterparts, contractual partners, intermediators as well as on the interactions with them, their financial condition, contractual conditions and other information that are not contained in public sources;
- 13) Commercial secret of the organizations-partners handed over to the Company on a discretionary basis (a confidentiality agreement is concluded);
- 14) The data on the preparation and results of negotiations with business partners;
- 15) Transactions made by the Company as well as contracts concluded, their subject, content, price and other important conditions;
- 16) Staff schedule of the Company;
- 17) The data on the order and condition of organizing a security alarm system;
- 18) The data on the order and condition of protecting a commercial and official secret of the Company;
- 19) The data on the intellectual property, know-how in the conduct of business, in medical science and technics determining qualitatively new level of medical opportunities and official presentation in public sources;
- 20) The data on the Company’s information system and the applied methods of information protection;
- 21) On the presence and owners of issued securities on the customers’ accounts in the security holder system and the nominee holding management system, on the balance and move of issued securities on this accounts except the information subject to be disclosed in accordance with the law on the security market.
- 2. The Company’s official secret includes these data:
  - 1) The data which are contained in a personal data file as well as their personal data;
  - 2) Own assessment of the character and image of the Company’s personal data;


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- 3) The Company’s acts (cadre, operational orders);
  - 4) Departmental statistical reporting;
  - 5) The data on remuneration system of the Company;
  - 6) Cadre statistics of the Company.
- 




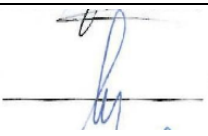
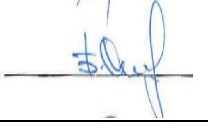
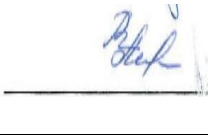
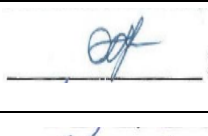

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## Agreement sheet

### Instruction on commercial and official secrets protection of the joint-stock company “Astana Medical University”

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Vice-rector for scientific and clinical activities	 <b>F.A. Galitsky</b>
Vice-rector for pedagogic activity and public relations	 <b>G.Z. Khairli</b>
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Director of the department of personnel management and legal security	 <b>B.A. Syzdykov</b>
Acting head of the financial and economic department	 <b>G.K. Alina</b>
Acting chief accountant	 <b>G.A. Kukeyeva</b>
Chief of the legal department	 <b>O.S. Ustinovich</b>

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