

Approved by the decision of
the Board of Directors
of Air Astana JSC
Minutes № 59 dated 27 April 2009

**REGULATIONS OF THE
CORPORATE INFORMATION POLICY
OF AIR ASTANA JSC**

ASTANA, 2009

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1. GENERAL PROVISIONS

- 1.1. The present Regulations of the Corporate Information Policy of Air Astana Joint Stock Company (hereinafter as the “Regulations of the Corporate Information Policy”) have been developed in accordance with the current legislation of the Republic of Kazakhstan (hereinafter as the “Legislation”), the Charter, Corporate Governance Code and internal documents of Air Astana Joint Stock Company (hereinafter as the “Company”).
- 1.2. The Regulations of the Corporate Information Policy define the main principles of information disclosure in respect of the Company’s activities to stockholders, the state bodies of the Republic of Kazakhstan, stakeholders of the Company (hereinafter as the “Stakeholders”), investors and other individuals or legal entities (hereinafter collectively referred to as the “Information recipients”).
- 1.3. The purpose of information disclosure of the Company’s activities is to provide the Information Receivers with the information required to make better decisions and/or actions and building clear information flow between the Company and Information recipients. The Corporate Information Policy shall contribute to the advantageous image of the Company by way of improving information transparency, assets value increase and investment appeal.

In implementation of the Corporate Information Policy, Air Astana JSC assumes that the Company is a national airline of international level. Any information about the Company distributed among Information Receivers may contribute to the investment attractiveness and, vice versa, impede its successful operation. The Company’s management is aware of its social responsibility and maintains an open ongoing dialogue with the Information recipients, promotes corporate reputation, develops information potential of the Company in Kazakhstan and abroad.

The Company sets itself up as law-abiding, equitable, respecting human and social rights in general, adhering to the principles of sustainable development.

- 1.4. The main principles of the Company’s Corporate Information Policy are the following:
 - Regularity, timeliness and efficiency of providing the information;
 - The provided information shall be objective, full, accurate, true and consistent;
 - Information recipients shall have equal rights for receiving the information subject to the standards and requirements, established by the Legislation, the Charter, Corporate Governance Code and internal documents of the Company;
 - Reasonable balance between the Company’s transparency and its interests.

- 1.5. Terms used in the Regulations:

Official - member of the Board of Directors; person solely performing the duties of the Executive Body of the Company.

Law – the law of the Republic of Kazakhstan “On joint stock companies”.

Intranet - local, closed computer network of the Company that has no connection to the world wide web Internet.

Information Policy - priorities and standards of the Company information activities in relation to its Information Receivers.

Confidential Information - the information that is not allowed for distribution both inside and outside the Company.

Corporate Information - information about the Company’s activities to be disclosed for distribution among the Information Receivers.

Bodies of the Company – General Meeting of Stockholders, Board of Directors, Executive Body of the Company.

President of the Company - person solely performing the duties of the Executive Body of the Company.

Disclosure of Information - delivery of information about the Company activities to the Information Receivers at regular intervals meeting the requirements of the entities regulating issuers’ activities, needs of the parties interested to have it and with consideration of best practices of corporate

governance in the area of information disclosure.

- 1.6. The terms used but not defined in the Regulations shall have the meaning used in the Legislation, the Charter, Corporate Governance Code and internal documents of the Company.

2. POLICY IMPLEMENTATION

- 2.1. To implement the Corporate Information Policy the Company:

- keeps a record of the information (data) to be disclosed in a mandatory manner in accordance with requirements of the Legislation, the Charter, Corporate Governance Code and internal documents of the Company;
- defines the list of information (data) to be additionally disclosed by the Company for the improvement of information transparency;
- establishes procedure for the information to be disclosed to Information Receivers in a mandatory manner or on a voluntary basis,
- defines the list of information, constituting commercial secret of the Company, which may impair the Company's interests in the event of disclosure (transfer, leakage); establishes measures to ensure safety of commercial secrets;
- establishes a system of control over the distribution and use of the information on the Company by way of defining the ways, forms and procedure for the information distribution as well as defining persons responsible for the arrangement and distribution of the information subject to disclosure;
- defines competence and responsibility of the Bodies, Officials and employees of the Company in relation to ensuring due disclosure of information on the Company and safety of confidential information.

3. INFORMATION RECIPIENTS

- 3.1. The Company's Information recipients include stockholders and investors, customers, personnel, business partners, public, state bodies.

- 3.2. ***Stockholders and investors***

Stockholders take strategic decisions with regard to the Company's development and control the activities of the Company's management in accordance with the Legislation, the Charter and other internal documents of the Company. The stockholders are also Company's investors that take decisions on further investments into shares and other Company securities. This group also includes commercial banks, investment and broker companies.

- 3.3. ***Customers***

The Company's main customers are its passengers and users of services in air transportation that may be both individuals and legal entities which the Company's status as a commercial entity aiming at generation and increasing profits depends on.

- 3.4. ***Personnel***

The personnel of the Company are the Information recipients that directly determine the success of the Company operation. All employees of the Company, including all employees of representative and distant offices, are included into this group.

- 3.5. ***Business partners***

Airlines, travel agencies, hotels, airports other transport organizations; suppliers of aircraft, spare parts and components, ground support and maintenance equipment; providers of repairs services and maintenance of airworthiness; insurance companies, banks and other financial institutions. Various contracts are concluded with them that allow stabilizing Company's positions on the transportation market.

3.6. Public

These are public groupings and organizations, population of the areas of the Company operation. They influence materially other target audiences of the Company. This audience includes also mass media that is the main means of delivering information about the Company to all other target audiences as well as to wide public. Mass media influence the image and reputation of the Company.

3.7. State bodies

State bodies play regulatory role in the operation of the air carriers, their legal acts may affect the Company's operations.

4. INTERNAL INFORMATION POLICY

4.1. All the Company's employees shall have the access to the corporate information and can use information resources necessary for performance of their duties. The Company's management is responsible to ensure that the personnel is well informed about the Company's activities, receive without delay both internal corporate and public information, constantly upgrade level of knowledge about the Company and the market of air transportation.

The Company shall not allow any discrimination in supplying information to various subdivisions and departments.

5. EXTERNAL INFORMATION POLICY

5.1. The Company shall act in the mode of information transparency in relation to its Information recipients. The extent of its transparency is determined in accordance with the Law; obligations to Kazakh and foreign organizations regulating issuers' activities; rules of disclosure of corporate information in line with the best world practices of corporate governance in the area of information disclosure.

6. INFORMATION DISCLOSURE FORMS AND METHODS

6.1. For information disclosure, the Company shall use the following communicative forms, including, but not limited to:

Paper document prepared for the Information recipients, including but not limited to replies to requests, releases (messages) in mass media, brochures, reports on the Company's activities, information for the Company's employees;

Verbal information, including but not limited to interviews, press-conferences, speeches at meetings and public events within or outside the Company;

Audiovisual records, including but not limited to video clips, corporate video, speeches or interviews at radio or television programmes, slides and other visual forms used at meetings and other events (conferences) within or outside the Company;

Information provided on electronic media, including but not limited to, floppy disks, CD-ROMs, USB devices, e-mail.

6.2. Disclosure of information may be carried out by the Company by using the following methods:

1) Providing access to the information (documents) for Information recipients in the order established by the Legislation, the Charter, the Corporate Governance Code and internal documents of the Company;

2) publications in mass media;

3) publication in Internet on the corporate web-site of the Company at www.airastana.com

- (hereinafter as the “corporate web-site of the Company”) used for ongoing presentation of the public updated information to wide audiences;
- 4) publication in internal sources of the Company (Intranet, “Microsoft Outlook”, etc.);
 - 5) publication in corporate editions like newspaper for personnel (internal corporate publication; provides information coverage of the Company operation and internal affairs; issued regularly on paper or in electronic forms, as well as in-flight magazine (corporate edition for the Company’s customers; issued regularly on paper; publishes regularly main news of the Company, product offer, safety instructions and other information important for passengers to know);
 - 6) holding meetings with Information recipients;
 - 7) other forms provided by the Legislation, the Charter and internal documents of the Company.

7. INFORMATION DISCLOSURE PROCEDURE

- 7.1.** The distributed information on the Company is divided into three groups:
Information to be disclosed to stockholders;
Information to be provided to the authorized state bodies in a mandatory manner and in the strict established order;
Information to be disclosed to stakeholders and other parties.
- 7.2. Disclosure of information to stockholders**
- 7.2.1 To protect rights and interests of the Stockholders, the Company shall provide access to the Stockholders to the information in the order established by the Legislation, the Charter, Code, the present Regulations and other internal documents of the Company.
- 7.2.2 Arrangement of information and documents shall be carried by the Board of Directors, President and Corporate Secretary.
- 7.2.3 The Corporate Secretary shall keep records of requests from the Stockholders and control over timely consideration of such requests by the Company’s bodies and timely provision of the information to the Stockholders.
- 7.2.4 The Stockholders shall be provided with the following, including but not limited to:
1) information affecting the interests of stockholders;
2) materials of the Annual General Stockholders’ Meeting;
3) results of auditing the financial and operational activities of the Company;
4) other information in accordance with the Charter, Legislation, decisions of the Stockholders and Board of Directors.
- 7.2.5 List of information affecting the interests of the Stockholders and procedure for its providing are defined in the Law and the Charter.
- 7.2.6 Materials on the agenda issues of Annual General Stockholders’ Meeting shall include:
1) annual financial statements of the Company;
2) auditor’s report to the annual financial statements;
3) proposals of the Board of Directors on the procedure for distribution of the Company’s net income and dividend amount one common stock of the Company for the reporting financial year;
4) annual report of the Company;
5) other documents at the discretion of the initiator of the Annual General Stockholders’ Meeting.
- 7.2.7 Materials on agenda issues of the Annual General Stockholders’ Meeting shall be submitted to the Stockholders by 1 August.
- 7.2.8 Annual financial statements shall be preliminarily approved by the Board of Directors of the Company not later than thirty calendar days prior to its submission for the consideration of the Stockholders. Annual financial statements of the Company shall be finally approved at the Annual

General Stockholders' Meeting.

- 7.2.9 Unless otherwise is provided by the Legislation and internal documents of the Company, the annual financial statements shall contain:
annual balance sheet;
statements of changes in stockholders' equity;
cash flow statements;
profit and loss statements;
other financial statements.
- 7.2.10 Annual report shall be considered by the Board of Directors and signed by the Chairman of the Board of Directors and/or President prior to submission to the Stockholders.
- 7.2.11 Unless otherwise is provided by the Charter, Corporate Governance Code and internal documents of the Company, Annual report of the Company shall contain:
- 1) Results of financial and operational activities of the Company;
 - 2) Goals, activity priorities (development strategy) of the Company and results of their implementation (achievements);
 - 3) Company's ownership structure in line with the Legislation requirements;
 - 4) Description of major issues related to the Company's activity and risk minimization measures;
 - 5) List of major transactions and interested-party-transactions, entered into by the Company during the reporting year, including the names of the transaction parties, conditions and the body of the Company, which decided on entering into such transaction;
 - 7) Procedure for determination and amount of compensation (expenses reimbursement) of the Company's Officials, paid or to be paid in the order, established by the internal documents of the Company based on the results of the reporting year;
 - 8) Essential issues related to the Stakeholders;
 - 9) Information on financial support, including guarantees from the government and any commitments to the government undertaken by the Company;
 - 10) Information on significant corporate events;
 - 11) Any other information, provided for by the Charter and other documents of the Company.

7.3 Disclosure of information to the state bodies of the Republic of Kazakhstan

- 7.3.1 The Company establishes communications with state bodies intended to create a favorable regulatory environment for the Company, the reputation of the Company as a law-abiding and respecting state interests entity. These communications are implemented by way of purposeful informing the governments and parliaments, organizations responsible for regulating air transportation, etc. The Company shall carry out special actions to inform representative of state bodies, including meetings, round-table discussions, seminars, presentations, etc.
- 7.3.2 The Company shall disclose information to state bodies of the Republic of Kazakhstan in the order established by the Legislation.
- 7.3.3 The Company shall disclose information in a mandatory manner to the following state bodies, including but not limited to:
authorized state body regulating and monitoring stock market;
authorized tax state body;
authorized statistics state body.
- 7.3.4 In accordance with requirements of the authorized state body regulating and monitoring stock market, the Company shall disclose the following information in the order established by the Legislation:
- 1) Information on affiliated persons;
 - 2) Securities emission prospectus;
 - 3) Report on placing securities;

4) any other information necessary for the authorized state body's performance of its monitoring functions, thereat the information provided shall not be disclosed.

- 7.3.5 The procedure for providing information on affiliated parties by the Stockholders and Officials of the Company shall be set by the Charter.
- 7.3.6 The Corporate Secretary shall collect and keep records of the information on affiliated parties and send the relevant information signed by the President of the Company to the state body regulating and monitoring stock market.
- 7.3.7 In accordance with the requests from the state bodies, in cases provided for by the Legislation the Company shall provide them with the relevant information within its competence. In the event the Company is not charged by the Legislation to provide such information, and if the requested subject is out of the competence of the relevant state bodies, the decision on providing the requested information in every specific case shall be made by the President of the Company. The confidential information shall be provided to the state bodies in line with the requirements of the Legislation and internal documents of the Company. Thereat, the Company shall have the right to require from the state bodies to keep confidential.
- 7.3.8 List of the information for disclosure to the state bodies is subject to the changes of the current Legislation.

7.4 Disclosure of information to the Stakeholders and other parties

- 7.4.1 The Company shall provide the Stakeholders with access to the information affecting rights and interests of the Stakeholders regularly and in due time in accordance with the Legislation, the Charter and internal documents of the Company.
- 7.4.2 In the event of reorganization (merger, consolidation, demerger, split-off, transformation) the Company shall send written notifications on reorganization to all creditors and publish the relevant information in mass media.
- 7.4.3 To inform the creditors, within the term defined by the Legislation, about the decision on entering into the major transaction made by the Board of Directors, the Company shall publish the information on the major transaction in the Kazakh and Russian languages in mass media.
- 7.4.4 The Company's employees shall have the right to receive full and reliable information on labor conditions and protection. After signing the labor contract in the order established by the internal documents of the Company, the employee shall be advised on this and other information relative to his/her duties. The Company's management shall ensure that the Company's employees are fully aware of and regularly informed on the Company's business, updated on latest corporate affairs. For this purpose, the Company's management shall arrange special conferences, information reports, publish and distribute internal corporate editions, various informative materials; ensure receipt by the employees of the materials directly related the employees; give interview at corporate events and in mass media and selectively test their awareness.
- 7.4.5 At the request of other organization which are not state bodies, the Company may provide the information with consideration of restrictions established by the Legislation and internal documents of the Company.
- 7.4.6 Information disclosure procedure for interactions with auditing organizations, consulting companies (consultants) and rating agencies shall be defined by the Legislation, the Company's internal documents and agreements with the said companies.

8. DISCLOSURE OF PUBLIC INFORMATION ON COMPANY'S ACTIVITIES

- 8.1. Due corporate governance practice shall contribute to the enhancement of the Company's reputation. Reputation and image of the Company shall be an essential part of its assets.
- 8.2. The Company shall seek to improve the level of public's awareness of its activity within and outside Kazakhstan. This would contribute to building positive public opinion (favourable image) of the Company and enhancing confidence from the part of investors and public.
- 8.3. The Company's communications with public are intended to facilitate the creation of friendly relations with the population in the territories of the Company operation, creation of its positive image and stable reputation. The Company will carry out various actions to consolidate its relations with public organizations, groups and influential public structures. The said actions may be of advertising, sponsor or charitable nature.

Kazakhstan and international mass media are important intermediary between the Company and the public. The Company prepares and distributes public materials for release via mass media, hold various functions for mass media, arranges ongoing contact with journalists. The Company employs Internet to ensure widest and quickest possible presentation of information about its activities. It carries out studies of the public opinion and monitoring of mass media.

- 8.4. The Company's communications with intended to cover relations with partners, alliances, commercial and agency agreements, introduction of joint products into the market, exchange of experience. They allow attracting additional groups of customers, improve the quality of the Company quality, extend the area of its operation, position the Company as an active market player.
- 8.5. The Company's communications with are imperative to retain the existing and win over new customers, as well as for attraction of passengers from other transportation areas. The Company makes use of various techniques to attract customers. In this case the Company produces and distributes special information and advertising materials to support its rating among the customers using in the first turn mass media. The Company analyses regularly requests, claims, and comments of the customers from the point of view of reputation management.
- 8.6. The Company shall use the following channels for the distribution of the public information:
 - 1) publications, interviews, speeches in mass media, at conferences;
 - 2) public annual report, annual financial statements, brochures, information on major transactions;
 - 3) maintaining the Company's corporate web-site.
- 8.7. The Company may place **press-releases**, short special messages for mass media, containing publication information. Press-release shall at the same time be placed on the Company's corporate web-site.
- 8.8. The Company's employees may deliver speeches at conferences held within Kazakhstan and outside in the order established by the internal documents of the Company.
- 8.9. The Company shall annually issue the **public annual report** on its activity.
- 8.10. The public annual report (greeting word) shall be signed by the Chairman of the Board of Directors and/or the President of the Company.
- 8.11. The public annual report of the Company shall be issued in written form in the state, Russian and English languages. Additional version of the public annual report shall be placed on the Company's corporate web-site.
- 8.12. The public annual report of the Company shall be issued on the Company's website, within, at least thirty calendar days after providing the Stockholders with the annual report on the Company's activities. The deadline for issue and publication of the public annual report shall be 1 September.

- 8.13. The public annual report shall be sent to the Stockholders and used at the meetings with investors, official delegations of foreign states and for visits to other states.
- 8.14. **Annual financial statements** shall be published in mass media with a run of thirty thousand copies, as the least, circulating within the Republic of Kazakhstan, not later than thirty calendar days after the approval thereof by the Stockholders.
- 8.15. The Company shall have the right to issue **brochures** on its activity.
- 8.16. Information on **major transactions** entered into by the Company shall be published in the Kazakh and Russian languages in mass media.
- 8.17. The Company shall maintain the corporate web-site www.airastana.com on a regular basis.
- 8.18. Information in the state, Russian and English languages shall be published at a time on the corporate web-site. The information in the English language can be published later, taken into account the time for translation, but not later than five days from the publication in the state and Russian languages.
- 8.19. The Company shall fix responsibility of its departments for the corporate web-site to be updated in due-time, in full and quality manner.
- 8.20. In addition to the information publically disclosed by the Company in accordance with the requirements of the Legislation, the following information and documents may be placed on the Company's website:
History of the Company;
Company's ownership structure and assets portfolio;
Corporate governance system;
Basic corporate documents (the Charter, regulations of the Company's Bodies, etc.);
Company's reports;
Operational activity: technical re-equipment and development; new technologies; environmental protection.
Information on procurement;
Information on staff policy of the Company;
Major corporate events;
Information on major transactions, party-interested transactions and affiliated persons of the Company;
Events calendar;
Other information disclosed at the Company's discretion.
- 8.21. Information on major corporate events is of special importance for the Stockholders, Stakeholders and other parties. For these purposes, the Company shall take measures to immediately place the abovementioned information on the corporate web-site.
- 8.22. Information on major corporate events of the Company is:
1) information on reorganization of the Company and its subsidized (associated) companies or liquidation;
2) information on amendments to the Company's Charter;
3) information on the state registration of equity securities emission;
4) information on the change of the Company's officials;
5) information on the change of the Company's auditing company;
6) information on major transactions or inter-related transactions, resulting in the acquisition or alienation of the property by the Company, which would amount to 25 or more percent of the Company's assets – date of the contract's conclusion;
7) information on decision on the Company's participation in the creation or activities of other juridical parties via transfer of a part or several parts of assets, which in total make up twenty five or more percent of the Company's assets;

- 8) information on dividends accrued and (or) paid on stocks;
- 9) information on the suspension or renewal of the equity securities emission, invalidation of the registration of equity securities emission;
- 10) other information in accordance with the internal documents of the Company.

8.23. The significant corporate event occurs on:

- 1) the date of the decision made by the authorized state body on the state registration of the legal entity established as a result of merger, consolidation, demerger, split-off, reorganization in respect of the information on reorganization of the Company;
- 2) the date of the decision made by the authorized state body on the registration of the new edition of the Company's Charter in respect of the information on the introduction of changes/amendments to the Charter;
- 3) the date of the decision made by the authorized state body on the state registration of the Company's securities emission in respect of the information on the Company's securities emission;
- 4) the date of the decision made by the relevant management body on the appointment of the chief executive officer in respect of the information on the change of the chief executive officer;
- 5) the date of the contract conclusion in respect of the information on the change of the auditing organization of the Company;
- 6) the date of the contract conclusion or the date of signing by the both parties in respect of the information on the transactions or interrelated transactions resulting in the acquisition or alienation of the property by the Company amounting to twenty five and more percent of the Company's assets;
- 7) the date of the decision made by the Stockholders on the information on the participation of the Company in the creation of or activities in other legal entities by way of transfer of a part or several parts of assets the total book value of which is twenty five and more percent of the total value of all assets of the Company;
- 8) the date of the decision made by the Stockholders on the dividends accrual and payment in respect of the information on the dividends accrued and (or) paid on stocks;
- 9) the date of the decision made by the authorized body on the suspension and renewal of the securities emission, invalidation of the state registration of the securities emission in respect of the information on the suspension and renewal of the securities emission, invalidation of the state registration of the securities emission.

8.24. Information disclosure in the form of announcement of the significant corporate event shall be made on the basis of the resolution of the President of the Company by way of publishing the announcement of a significant corporate event on the Company's corporate web-site within five (ten, where applicable) working days since the moment when the significant corporate event occurred.

8.25. The text message on the significant corporate event shall be available on the corporate web-site in Internet during the period of, at least, six months since its publication in Internet.

8.26. A separate message shall be written for each significant corporate event.

9. INFORMATION DISCLOSURE BY BODIES, OFFICIALS AND EMPLOYEES OF THE COMPANY

9.1. The Company's Officials and employees shall disclose the information in accordance with the Legislation, the Charter, the Regulations and other internal documents of the Company.

9.2. The Board of Directors jointly with the President of the Company shall develop, revise from time to time and keep the Information Policy updated on a regular basis.

9.3. The Company's Bodies shall be responsible for completeness and accuracy of the Company's information disclosed within their competences. The competence and responsibility of the Bodies, officials and employees of the Company for information disclosure is defined in the Legislation and

internal documents of the Company.

- 9.4. The President of the Company shall be responsible for arranging and timely providing information and reporting data to the relevant state bodies, for reliability of such information and reporting data and for providing the information on the Company's activities to the Stockholders, creditors, other Stakeholders and mass media.
- 9.5. The Chairman of the Board of Directors of the Company shall have the right to officially comment on decisions made by the Board of Directors of the Company, and to express viewpoint of the Board of Directors on issues considered at the meetings of the Board of Directors in line with the requirements for keeping safe the state, official, commercial and other secrets of the Company protected by the Legislation.
- 9.6. The members of the Board of Directors and its Committees shall have the right to express their point of view to public on issues, considered at the meetings of the Board of Directors (Committees), and on decisions made at the meetings of the Board of Directors (Committees) in line with requirements for keeping safe the state, official, commercial and other secrets of the Company protected by the Legislation.
- 9.7. The President/Corporate Secretary shall maintain control over the timely information disclosure in the order established by the Legislation, the Charter, the present Regulations and other internal documents of the Company. The President/Corporate Secretary shall provide the storage of the documents relative to the Company's activities to be kept in accordance with the Legislation and the Charter, access to and copying them. The President/Corporate Secretary shall certify the mentioned documents in a mandatory manner.
- 9.8. The publications/texts of the Company's employees shall be agreed with the President of the Company in a mandatory manner.
- 9.9. Press-release shall be published in mass media and on the Company's corporate web-site only upon the approval by the President of the Company and the person whose competence covers the subject of the information.
- 9.10. The President of the Company shall have an exclusive right to speak in public on issues relevant to the Company's activities. The President of the Company shall have the right to delegate staff of the Company, in the order established by the internal documents of the Company, to speak in public (provide information) on behalf of the Company at foreign and local conferences, seminars, meetings of work groups of the state bodies of the Republic of Kazakhstan and other public events, to participate in press-conferences, phone- and video-conferences, to give interviews, to give comments to Kazakhstan and foreign mass media, financial and investment companies in line with the requirements for keeping safe the state, official, trade/commercial and other secrets of the Company protected by the Legislation.
- 9.11. Persons not authorized to speak on behalf of the Company shall not have the right to give comments and replies to questions and requests relative to the Company's activities. The Company's employees shall not be entitled to distribute corporate information for the purpose of its publication without prior notification to the President of the Company. In case of receipt of an external request for provision of corporate information any employee must advise his/her superior about such request, who may redirect such request to the President of the Company. The said rule shall not be applied to written information materials marked "For release". Neither shall it concern working exchange of information between employees in the process of fulfilling their duties in accordance with their formal functions. Every instance of an unauthorized disclosure of corporate information with the purpose of its publication shall be the reason for internal formal investigation in accordance with procedure established in the Company.
- 9.12. Distribution by the Company's employees of information damaging the Company, containing appeals for disruptive actions, refusal to fulfill decisions and orders of the Company's President are expressly

prohibited.

- 9.13.** Internal corporate information media including, information boards, bulletin boards/stands and Intranet are allowed to be used only for official corporate information and administrative information.

10. PROTECTION OF CONFIDENTIAL INFORMATION

- 10.1.** The Company shall protect secret and/or confidential information in the order provided for by the Legislation and internal documents of the Company. Conditions of access to such information, and its availability for usage are determined proceeding from the need of observing reasonable balance between the Company's openness and the task to prevent any damage to its interests.
- 10.2.** Confidential information includes:
- any information concerning issued securities and transactions with them, and about the issuer thereof and the activity it is involved in, that is not known to third parties and the disclosure of which may affect the market price of the said securities (insider information);
 - the information that constitutes official and trade/commercial secret in accordance with the current Legislation;
 - any other information before it has been formally disclosed by the Company.
- 10.3.** The Company shall take measures to protect confidential information in accordance with the Legislation and internal documents of the Company. List of information constituting official and trade/commercial secret shall be determined by an internal document approved by the Board of Directors of the Company (Annex 1 to the present Regulations).
- 10.4.** Officials and employees of the Company shall only use confidential information in the interest of the Company and in compliance with the Regulations and other internal documents of the Company. Contracting parties of the Company shall use confidential information they come to possess in compliance with the Legislation, other legal acts and agreements with the Company.
- 10.5.** For the purpose of ensuring the compliance of the Company's Officials, employees and contracting parties with the order of usage of confidential information the Company shall have the right to do the following:
- to provide in the internal documents, labor and other contracts duties for observance of the order of the use of the confidential information and the liabilities for a failure to do so;
 - to ensure that the parties mentioned above are aware of the list of the confidential information;
 - to ensure that the parties mentioned above are aware with the established order of the use of the confidential information and with the liabilities for any failure to observe it;
 - to make appropriate arrangements for the parties mentioned above enabling them to comply with the established order of the use of the confidential information;
 - to use against the persons who failed to observe the order of the use of the confidential information, the provided penalties and demand compensation of any damage or loss caused to the Company as a result of a failure of the said persons of the order of the use of the confidential information (including in court);
 - to take other actions aimed at assuring the order of the use of the confidential information.
- 10.6.** With the aim of protection of confidential information the Officials and employees of the Company shall:
- observe the established order of the use of the confidential information;
 - not disclose confidential information, not transfer it to third parties and not use it in own interests without Company's consent if it is not otherwise provided by the Law, other regulations or reasonable requirements of the state or other bodies;
 - not disclose confidential information after termination of the labor contract or other agreement with the Company;
 - compensate any damage caused to the Company as a result of any failure of the said person (persons) of the order of the use of the confidential information;

- to pass back to the Company any material media of information with confidential information in his/her possession at the time of termination or expiration of a labor contract or other agreement with the Company;
 - observe other requirements for protection of confidential information as provided by the Law, other regulations, the Charter of the Company, the Regulations and other internal regulative documents of the Company and agreements with the Company.
- 10.7.** The Company shall have the right to implement special procedures intended to protect confidential information from unauthorized use. The said procedures shall be introduced to:
- secure compliance with the order of the use of the confidential information, including by prevention of unauthorized access to the confidential information and its use by the Officials and employees of the Company and third parties to the detriment of the Company interests;
 - improve creditability of the Company on the part of its investors and partners.
- 10.8.** To achieve the above goals the Company shall be entitled to employ the following procedures:
- to introduce rules of access for persons (including the Company's employees) to specific rooms occupied by the Company (including holidays and weekends);
 - to make distinctions between the rights of access of the Company's employees to the confidential information;
 - to collect from the Company's employees written obligations on the nondisclosure of the confidential information;
 - to allow access to specific data constituting the confidential information in special places only;
 - to timely dispose of all documents that may contain confidential information and are not required to be kept on record;
 - to introduce procedures for protection of work places and places of documents storage against an uncontrolled access and observation;
 - to use security systems of technical information systems that prevent the interference with the information and unauthorized access to the information through communication channels;
 - to appoint a person/department empowered to control over the order of the use of the confidential information and providing counsel on its improvement.
- 10.9.** The Company's employees shall be obliged not to disclose confidential internal (inside) information for the period of their employment. The Company shall establish a period during which such information shall not be disclosed after the termination of their employment with the Company.
- 10.10** In the event of violation of the Legislation, the Charter, the present Regulations and internal documents of the Company resulting in the damage to the Company and/or its Stockholders, when disclosing the information, the guilty persons shall be brought to the responsibility in the order established by the Legislation.

11. INFORMATION PROVISION IN CRISIS SITUATIONS

- 11.1.** The President of the Company shall be responsible for ensuring proper functioning of the anti-crisis information warning and response system. In coordination with the President of the Company as well as operational departments the Company's Crisis Center shall perform the following functions:
- analyzing world practices of information provision in crisis situations;
 - participating in developing instructions regulating the Company's employees behavior in crisis situations;
 - preparing by way of special training selected employees of the Company;
 - performing testing by simulating crisis situations;
 - developing a mechanism for information delivery at the sites of crisis;
 - creating a data base containing mock-ups of information materials intended for quick response to crisis situations.

12. CONCLUSION

- 12.1. The present Regulations shall come into force on the date of approval thereof by the Board of Directors of the Company and be amended and changed upon the decision of the Board of Directors of the Company.
- 12.2. Should, as a result of amendments to the legislation of the Republic of Kazakhstan, certain clauses of the present Regulations contradict the current legislation of the Republic of Kazakhstan, such clauses shall cease to be in force and, until the moment of amending the present Regulations, the current legislation of the Republic of Kazakhstan shall be governed by.

13. CONTACT INFORMATION

Contacts of the Corporate Secretary:

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e-mail: corporate.secretary@airastana.com

Contacts of the Public Relations Department:

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**LIST OF INFORMATION WHICH CONSTITUTES AN OFFICIAL OR COMMERCIAL
SECRET AND PROCEDURE FOR DISCLOSURE OF SUCH INFORMATION**

I. Air Astana JSC (the “Company” hereinafter) defines the following information as confidential which constitutes the official or commercial secret, except for the cases when the following information listed in the chapter 1 of this document is recognized as publicly available due to the official publication of such information in the mass media or on the Company’s corporate web-site as authorized by the President of the Company:

1. Any financial documentation, all correspondence (including by means of electronic or facsimile communications), archival data and any information provided to the state departments, stockholders, and, at the discretion of the Company, to the third parties, as well as the internal information with regards to the financial and operational activities of the Company, such as: data from the financial statements of the Company, tax and statistical reports, interim internal reports and documentation, information on the costs of rendered services, planned and forecasted data, business plans and budgets data, data on earned revenues and expenditures of the Company, analysis of the Company’s financial and operational activities, information on cash flows, including the bank payments, information on used or planned borrowings, their amounts, sources and terms, as well as other information related to the financial and operational activities of the Company.

2. Any documentation and information relevant to the operations of the Company, such as: any drawings, formulations, specifications, books, manuals, archival data, official correspondence (including by means of electronic or facsimile communications), as well as any correspondence with the third parties, including with the state departments, prosecutor’s offices, partners and other persons; handbooks, manuals, reports, documents and minutes, on paper or on electronic media, internal orders and instructions of the management of the Company, internal regulations, decisions of the executive body of the Company, the Board of Directors or Stockholders, working instructions given verbally or in writing and relating to the operations of the Company, its methods, procedures, practices or equipment used.

3. Any internal information not intended for the external use, including the information that could be misinterpreted and thus influence the business reputation of the Company.

4. Terms of bilateral or multilateral agreements signed or to be signing by the Company, information on contracting parties, any commercial information contained in the agreements, amounts, volumes, prices, including for the lease or insurance agreements (any leases: operational, financial, wet leases), as well as the agreements on maintenance and provision of aircraft, engines, spare parts and units, the information on the proposals of the current or potential suppliers, including their prices, terms of payment and other conditions.

5. Information on the approvals, certificates, licenses held by the Company and its employees, and any information used for the preparation of requests for such approvals, certificates or licenses.

6. Any documentation and information on the aircraft maintenance issues, including data on maintenance centers and providers, maintenance programme, spare parts and units, their suppliers, performed maintenance tasks or work in progress; any information related to the technical conditions of the aircraft, its parts or units, including the information of the Acceptable Deferred Defects, as well as the information related to the safety of flights such as Air Safety Reports, Incident Investigation Reports or Flight Data Reports, except for the cases when such information has to be used or released by the employee of the Company when undertaking his or her duties.

7. Technical or operational documentation related to the performed flights, such as: the information from the logbooks, assignments for the flights and other.

8. Any documentation and information relating to held or planned tenders for the purchase of goods or services, including prices, terms and volumes, except for the cases when it is necessary to provide such information to the potential suppliers in accordance with the announced tenders and the applicable legislation of the Republic of Kazakhstan and the Procurement Manual of the Company.

9. Any documentation and information relating to the commercial activities of the Company, such as: planned and actual internal schedule of flights (except for the advertising schedule distributed among the ticket sales agencies), planned routes, information on passengers, baggage or cargo, load factors, bookings data, planned tariffs, information on use and management of reservation resources and capacity allocation to the tariff classes.

10. Personal information on the employees and engaged specialists and consultants, their salaries and other terms of employment or engagement, mandatory or bonus payments.

II. The employees of the Company shall not make copies, records, photographs or summaries of the confidential information listed above except for the cases when it is required to do so when undertaking his or her duties under the individual employment contract, and shall not otherwise disclose, transfer or remove from the Company's facilities the confidential, official, commercial or any other legally protected information to the third parties verbally, on paper or electronically or by any other means or methods. All such confidential information shall and will remain the exclusive property of the Company and shall be returned upon request.

III. Any disclosure of the confidential information including to the mass media or third parties shall be authorized only by the President of the Company, who can delegate the authority of approving the disclosure of certain types of confidential information.

IV. The employees of the Company shall not allow for the unauthorized disclosure of such information during the currency of their employment contracts and within five years after the expiry or cancellation of their employment contracts.

V. This list is subject to familiarization and observance by all of the employees of the Company and shall be the required annex to the individual employment contracts.