«SkyBridge Invest» Акционерлік қоғамы

Алматы қаласы

АО «SkyBridge Invest»

«SkyBridge Invest» Joint Stock Company

Almaty

RULES FOR CLIENT INTERACTION AND PROCEDURES FOR HANDLING CLIENT COMPLAINTS AND REQUESTS OF JSC "SKYBRIDGE INVEST"

г. Almaty, 2026

TABLE OF CONTENTS:

TERMS AND ABBREVIATIONS USED IN THIS DOCUMENT

Assets	The total amount of funds and financial instruments held in the accounts of the Client and the Company;
Broker	The Company, acting as a professional participant in the securities market, executing transactions with issued securities and other financial instruments on behalf, at the expense of, and in the interests of the Client;
Brokerage Agreement	An agreement for the provision of brokerage services and nominal holding services (or without such services), concluded between the Broker and the Client in accordance with these Rules;
Company	JSC "SkyBridge Invest", BIN 031040003597, carrying out brokerage and dealer activities in the securities market with the right to maintain client accounts as a nominal holder on the basis of a license issued by the authorized body;
Client	A person using or intending to use the services of a professional participant of the securities market;
Client Order	A document provided by the Client to the Broker specifying the performance of a certain action in relation to the Assets owned by the Client;
License	A document issued by the authorized body granting the Broker the right to conduct certain types of activities in the securities market;
Instruction	A document provided by the Client to the Broker specifying the execution of a nominal holding operation;
Regulations	The Regulations on the Brokerage Activities of the Company;
RK	The Republic of Kazakhstan;
Authorized Body / AB	A state body responsible for state regulation of relations arising in the securities market;
FI	Financial instruments: funds, securities, including derivative securities, derivative financial instruments, as a result of transactions with which a financial asset arises for one organization and a financial liability or equity instrument arises for another organization;
Security	A set of records and other designations certifying property rights.

Concepts and abbreviations not specified in this section shall be interpreted and applied in accordance with the legislation of the Republic of Kazakhstan.

General Principles of Interaction between the Company and the Client

The interaction between the Company and the Client shall be based on the following principles:

- The Client and the Broker shall strive to ensure maximum transparency, clarity, and predictability of each other's actions.
- The Broker shall not perform any actions (transactions) with the Client's Assets without having a relevant Client Order, Instruction, or documented prior agreements.
- The Parties shall immediately notify each other of any changes or emergence of any information that may in any way affect their interaction (including changes in details or representatives; changes to internal rules, forms, tariffs; revocation or suspension of the Broker's license; inability of the Client to ensure execution of a transaction in accordance with the Client's instruction, etc.).
- The Parties undertake to act in good faith and perform their obligations and agreements reached with each other in a timely and complete manner.

Employees interacting with Clients shall possess knowledge of the legislation of the Republic of Kazakhstan on the securities market, the Company's internal documents, the terms and conditions of financial products provided and the risks associated with them, and shall regularly undergo training in accordance with the procedure established by the Company's internal documents.

When interacting with Clients, unfair practices shall not be permitted, including:

- encouraging the Client to acquire a financial product that does not correspond to the Client's stated needs when providing investment advisory services;
- concealing, distorting, or incompletely disclosing information on material terms and risks of a financial product;
- creating conditions that restrict the freedom of choice of a financial product or an organization carrying out brokerage activities, except where such restrictions are caused by objective infrastructure or contractual limitations;
- imposing additional paid services, as well as concealing information about the right to refuse to purchase such services.

Authorized employees of the Company shall conduct personal meetings with Clients and representatives of legal entities in accordance with the approved reception schedule. Information on the reception schedule shall be published in accordance with the procedure established by the Company's internal documents.

Service Features for Persons with Disabilities and Persons with Reduced Mobility

The servicing of persons with disabilities and persons with reduced mobility shall be carried out through personal visits to the Company's office, mobile application, website, personal account, telephone communication, e-mail, and other service channels provided for by the Company's internal documents.

The Client or their representative shall have the right to submit an application to the Company requesting the restriction or disabling of certain service channels in the cases and in accordance with the procedure established by the Company's internal documents. The Company shall inform the Client about the possible consequences of establishing such restrictions, including the inability to use certain services, functionalities, or methods of submitting instructions.

When providing services through the website, mobile application, and personal account, the Company shall provide Clients with the opportunity to obtain information on brokerage services, financial instruments, and the status of client accounts, as well as to perform transactions within the scope of functionality provided by the relevant service. Certain functions of the website, mobile

application, and personal account may be fully or partially unavailable due to technical features of software, devices, accessibility tools, or specialized applications used by the Client. The Company shall not be liable for limitations in the operation of the website, mobile application, or personal account caused by incompatibility with software or technical equipment not owned by the Company.
The signing of documents and confirmation of the Client's expression of intent shall be carried out by methods provided for by the legislation of the Republic of Kazakhstan, the Brokerage Agreement, and the Company's Internal Documents, including a handwritten signature, electronic digital signature, biometric identification tools, dynamic identification, and other methods permitted by the legislation of the Republic of Kazakhstan.
Consultations on brokerage services, financial products, and the procedure for using service channels may be provided by the Company's employees via telephone communication, e-mail, personal visits to the Company's office during Client reception hours, as well as through other communication channels provided for by the Company's Internal Documents.

Procedure for Handling Client Requests and Complaints

In order to establish effective relationships with Clients, the Broker shall maintain a dedicated register of Client requests, complaints, claims, and information on measures taken to address them. Information on received Client requests shall be retained by the Company for at least 5 (five) years.

The Company shall consider Clients' requests, applications, complaints, and claims objectively, in a timely manner, and in accordance with the procedure established by these Regulations. Restriction of the Client's rights, deterioration of the terms of service, or application of any adverse measures against the Client due to the Client's submission of a complaint, claim, or other request to the Company shall not be permitted.

For the purposes of these Regulations, a request shall mean:

- written requests submitted in person, by mail, or by e-mail;
- oral requests submitted by telephone or during a Client's personal visit to the Company.

Messages sent through the real-time messaging system available on the website and/or mobile application and/or received at subscriber numbers registered with the Company shall not be recognized as Client requests and shall be treated as informational inquiries. If a Client submits a complaint, claim, or objection regarding the actions (inaction) of the Company through the real-time messaging system, the Client shall be informed of the procedure for submitting a request in accordance with these Regulations.

The following shall not be considered Client requests:

- requests submitted by the Company's employees to the employer regarding labor and social matters, unless such requests are related to the provision of services, except where the employee is also a Client;
- corporate conflicts and disputes between shareholders, participants, members of management bodies, and the Company that are not related to the provision of brokerage services;
- requests from counterparties that are not Clients under agreements unrelated to the provision of brokerage services (lease, supply, contracting, outsourcing, IT support);
- requests for information or clarification of the legislation of the Republic of Kazakhstan that do not contain an expression of dissatisfaction with the Company's actions;

- requests related to the provision of reports by the Company (tax, statistical, or other reports), unless they contain information on violations of the Client's rights and legitimate interests;
- requests regarding alleged violations of the legislation of the Republic of Kazakhstan, corruption, or abuse that do not specify a violation of the rights of a specific Client;
- requests from mass media, professional and public associations that are not Clients under a specific Brokerage Agreement, except for requests submitted in the interests of a specific Client;
- correspondence with state authorities regarding control, supervision, and law enforcement matters that does not contain an independent Client request;
- requests that do not allow the content and/or requirements of the applicant to be identified (illegible texts, incoherent messages, or mass automated mailings).

The requirements established by this section shall not apply to the Company's consideration of applications for entering into a Brokerage Agreement.

Client requests shall be classified into the following categories:
1) opening and maintenance of a brokerage account;
2) execution of Client Orders;
3) quality of consultations;
4) commissions and tariffs;
5) operation of the mobile application;
6) operation of the website;
7) technical failures;
8) quality of service;
9) advertising and promotion of financial products;
10) other matters.

In addition, Client requests shall be classified according to the level of risk:
- low risk;
- medium risk;
- high risk;
- critical risk.

The allocation of functions and responsibilities in the process of handling Client requests shall be carried out as follows:
- The Client Relations Department shall ensure the receipt, registration, and initial processing of Client requests;
- The Company's structural units, within the scope of their respective authority, shall ensure the provision of information, documents, explanations, and other materials necessary for the consideration of Client requests;
- The Legal Department shall participate in the consideration of requests requiring legal analysis and in the preparation of the Company's legal position;
- The Client Rights Protection Service shall monitor compliance with the rights and legitimate interests of individual Clients, analyze Client requests, identify systemic deficiencies in Client service processes, and develop recommendations for their elimination;
- Responses to Client requests shall be signed by authorized persons of the Company in accordance with the distribution of powers established by the Company's Internal Documents.

Acceptance and Registration of Requests and Complaints

Upon receipt of a request or complaint, a Company employee shall verify the authority of the applicant and register the request in the register of requests and complaints. Upon receipt of requests and complaints from legal entities, a Company employee shall have the right to verify the signature and seal (if any) for compliance with the documents available to the Company. Unjustified refusal to accept requests shall not be permitted.

Oral requests submitted by telephone shall be subject to mandatory registration. Call recordings shall be made with the Client's consent, provided that the Client is notified thereof at the beginning of the conversation. Requests received by the Company in oral form (by telephone or during a personal visit) shall be considered at the time of submission. If an oral request cannot be resolved at the time of submission, the Client shall be informed of the procedure for submitting a written request and the terms for its consideration.

Written Client requests shall be registered in the Company's incoming correspondence register. The Client shall be provided with a document confirming acceptance of the written request, or a mark shall be made on a copy of the request indicating the registration number and date of registration.

Requests or complaints shall be left without consideration in the following cases:

1. the request or complaint does not specify an address or another method for sending a response to the applicant;
2. the request or complaint does not contain information allowing the applicant to be identified;
3. the request or complaint contains obscene or offensive language, threats to the life, health, or property of the Company's employees or other persons;
4. the text of the request or complaint cannot be read;
5. the request or complaint has been submitted by a person whose authority has not been duly confirmed.

n the cases specified in subparagraphs 2)-5) of this section, the Company shall notify the applicant of the reasons for leaving the request without consideration within 5 (five) business days from the date of receipt of the request, provided that such notification is possible based on the available information about the applicant.

Review of Requests and Complaints

The Company shall review requests and complaints objectively, comprehensively, and taking into account all documents and information provided.

During the review of a request or complaint, the Company shall have the right to request additional documents, information, and explanations from the applicant necessary for a complete and comprehensive review of the circumstances of the request. If necessary, the Company shall conduct an internal review (official investigation) of the facts set out in the request or complaint with the involvement of relevant structural units.

The period for reviewing a request or complaint shall not exceed 15 (fifteen) business days from the date of their registration. If additional documents are required or circumstances that are material for the review of the request or complaint need to be established, the review period may be extended for no more than 15 (fifteen) business days. The Company shall notify the Client of the extension of the review period within 3 (three) business days from the date of the relevant decision.

Results of Review

Following the review of a request or complaint, the Company shall provide the applicant with a reasoned response setting out the results of the review and the decisions taken. A written response shall be provided in the language of the request and shall contain:

- substantiated and reasoned arguments on each issue raised;
- references to the legislation of the Republic of Kazakhstan, the Company's Internal Documents, and the terms of the Brokerage Agreement;
- a description of the established factual circumstances;
- clarification of the right to appeal the decision.

The response shall be signed by an authorized person and provided to the Client in the manner stipulated by the Brokerage Agreement. In case of a personal visit, the response shall be delivered to the Client or the Client's representative against signature with a corresponding mark in the registration log.

If violations are identified, the Company shall take the necessary measures to eliminate such violations, restore the Client's violated rights (where there are grounds for doing so), and prevent similar violations in the future.

Information on the received request or complaint, the results of its review, and the measures taken shall be recorded in the Client requests and complaints register and stored in accordance with the Company's Internal Documents.

A Client who is an individual, an individual entrepreneur, or a small business entity shall, after applying to the Company, have the right to apply to the financial ombudsman in cases where the Company refuses to satisfy the Client's property claim or fails to provide a response within the time limits established by the legislation of the Republic of Kazakhstan. In such cases, the Company shall ensure interaction with the financial ombudsman within the scope of its authority, provide the necessary documents and information, and take measures to implement decisions of the financial ombudsman in the cases and manner established by the legislation of the Republic of Kazakhstan.