

## **INSTRUCTION ON THE PROCEDURE OF INFORMATION DISCLOSURE OF PARITETBANK OJSC**

### **CHAPTER 1 GENERAL PROVISIONS**

1. This Instruction on the Procedure of Information Disclosure of Paritetbank OJSC (hereinafter - the Instruction) is developed in accordance with the Banking Code of the Republic of Belarus, the Law of the Republic of Belarus dated December 9, 1992 "On Business Entities", the Law of the Republic of Belarus dated January 5, 2015 "On the Securities Market", the Instruction on Information Disclosure approved by the Resolution of the Board of the National Bank of the Republic of Belarus No. 19 dated 11.01.2013, the Instruction on the Procedure of Information Disclosure in the Securities Market approved by the Resolution of the Ministry of Finance of the Republic of Belarus No. 43 dated 13.06.2016, the Law of the Republic of Belarus dated 07.05.2021 "On Protection of Personal Data", the Charter of Paritetbank OJSC (hereinafter - the Bank) and establishes the Bank's approaches to the composition and scope of information to be disclosed, the purposes of disclosure of information, the procedure and frequency of disclosure of information, the means of bringing information to the attention of information users, as well as the mechanisms of internal control over proper disclosure of information.

2. In this Instruction, the following terms shall have the following meaning:

annual accounts - annual individual accounting (financial) reports of the Bank prepared in accordance with the national accounting standards, accounting (financial) reports, other regulatory legal acts on accounting, accounting (financial) reporting (hereinafter - NSFR) and (or) in accordance with the International Financial Reporting Standards and their Interpretations adopted by the International Accounting Standards Foundation (hereinafter - IFRS);

interested users - clients, counterparties, shareholders, other beneficial owners of the Bank, other legal entities and individuals interested in obtaining information on the Bank's activities;

information on the Bank's activities - information on registration, licensing powers, business plan (strategic development plan), corporate governance, risk management and internal control systems, financial reliability and general condition, types and terms of banking operations, organisational structure, ownership structure, individual accounting (financial) reports and other essential information;

printed mass media - official periodicals determined by the President of the Republic of Belarus for promulgation (publication) of regulatory legal acts of the Republic of Belarus, as well as the magazine "Bulletin of the Association of Belarusian Banks";

disclosure of information - provision of access to information on the Bank's activities by publishing, posting in public places, on the official website of the Bank on the global computer network Internet (hereinafter - the Website), of the National Bank of the Republic of Belarus (hereinafter - the National Bank), by providing such information at the request of interested users, as well as in accordance with the legislation.

Information is recognised as essential if its absence or provision in a distorted form may affect the economic decisions of the interested user.

3. The purposes of disclosure of any information on the Bank's activities are to increase transparency of its activities, as well as to form and maintain a positive image of the Bank, to strengthen confidence of clients and counterparties to the Bank and to establish business partnership relations and

long-term co-operation with them, to inform interested users about the Bank's activities, to stimulate competition in the market of banking services.

Decisions on resolution of issues not regulated by this Instruction shall be made by the Chairperson of the Board of the Bank.

## CHAPTER 2 SCOPE, PROCEDURE AND TERMS OF DISCLOSURE OF INFORMATION ON THE ACTIVITIES OF THE BANK

4 The organisation of the information disclosure process shall be carried out by the Marketing and Advertising Division (hereinafter - the Division) in cooperation with the Legal Department, the Finance Department, the Accounting and Reporting Division and other subdivisions of the Bank.

The scope and procedure of placement of information brought to the attention of interested users by the Bank shall ensure:

reliability and clarity - information on the Bank and its activities should be relevant, true, comparable, undistorted, presented in the most convenient for perception form, allow to assess the actual economic content of processes, phenomena, facts, conditions, states related to the Bank's activities and its financial condition;

completeness - the information shall be essential and sufficient for interested users to make balanced economic decisions, but shall not be excessive. The Bank shall also disclose negative essential information about itself in cases, in the manner and to the extent determined by local legal acts or at the request of the National Bank in the manner and to the extent determined by it;

accessibility - placement of information in the Bank's premises and on its website, its publication in printed media, as well as provision at the request of interested users shall ensure free, easy and convenient access to the disclosed information with the minimum necessary expenditure of effort, funds and time of interested users to obtain such information;

timeliness and regularity - information shall be disclosed within the timeframes and periodicity required by law, and in the absence of such requirements - within reasonable timeframes ensuring timely economic decision-making by interested users;

promptness - essential information on facts, circumstances, events and actions related to the Bank's activities should be disclosed as soon as possible;

absence of information asymmetry - information, including information provided upon similar requests, shall be disclosed to all interested users in equal scope. The Bank shall take necessary measures to exclude cases of sending information subject to disclosure in accordance with the requirements of this Instruction only to one or several interested users, as well as untimely disclosure of such information;

preservation of banking secrecy and confidentiality of information - information constituting banking, commercial and other legally protected secrets of the Bank, its clients and counterparties shall not be disclosed, except for cases when such information is provided in accordance with the legislation.

5. The Bank shall indicate on the head page of the Bank's website a link to the page containing the list of information to be disclosed in accordance with this clause and shall place the following information on the Bank's website:

5.1 name, information on the location, state registration of the Bank (registration number in the Unified State Register of Legal Entities and Individual Entrepreneurs, date of the decision on state registration), banking licensing authorities (number and date of issue of the banking licence, list of banking operations specified therein), 5.1 information on suspension, reinstatement or revocation by the National

Bank of the banking licence, including with regard to certain banking operations, full text of the Charter of the Bank, size of the authorized capital, mode of operation and reference telephones;

5.2. information on banking operations and other services, including terms and conditions of conclusion and execution of transactions, amount of remuneration (fee) for their execution, procedure of settlements and other information;

5.3. information on the organisational structure of the Bank by regions (regions and the city of Minsk): name, location, working hours and reference telephones of structural subdivisions established by the Bank and remote workplaces;

5.4. composition (Chairperson, Independent Directors, representatives of the state in the management bodies of the Bank, other members) of the Supervisory Board of the Bank: surname, first name, patronymic (if any), place of principal employment (position held) and (or) information on carrying out activities as an individual entrepreneur, notary, lawyer, qualification and professional experience, membership (management) in committees established by the Supervisory Board of the Bank;

5.5. composition (members) of the Board of the Bank: surname, first name, patronymic (if any), position held, qualification and professional experience, powers (supervised issues), procedure (schedule) for receiving visitors;

5.6. values of indicators characterizing the Bank's compliance with the following safe functioning standards established by clauses 3, 3-1 and 4 of the Instructions on Safe Functioning Standards approved by the Resolution of the Board of the National Bank of the Republic of Belarus No. 137 dated September 28, 2006:

minimum amount of regulatory capital as of the 1st day of the month;

regulatory capital adequacy ratios as of the 1st day of the month;

liquidity ratios (minimum and maximum values of indicators for the previous month);

norms of risk concentration limitation in terms of the norm of total amount of large risks for the last working day of the month, the norm of total amount of risks on insiders - legal entities and interrelated entities and insiders - individuals and interrelated entities as of the 1st day of the month, as well as the norm of total amount of risks on insiders - individuals and interrelated individuals as of the 1st day of the month

This information is given in the form of a summary table, in which along with the values of indicators characterising the Bank's compliance with safe functioning norms, the values of safe functioning norms are given in the following order:

for liquidity ratios - values effective on the respective days of the month when the minimum and maximum values of the Bank's indicators characterising the fulfilment of these ratios are reached;

for other ratios - values effective on the last working day of the month preceding the month, as follows of the month preceding the month on the 1st day of which the information is placed on the values of indicators characterizing the Bank's compliance with these ratios;

5.7. the amount of actually created and estimated special reserves to cover possible losses on assets and operations not recognised on the balance sheet as of the 1st day of the month;

5.8. information on the ownership structure of the Bank:

shareholders and other beneficial owners of the Bank holding five or more percent of the Bank's shares: name and country of location (in respect of an organisation), surname, first name, patronymic (if any) and country of residence (in respect of an individual);

5.9. in full annual individual accounting (financial) reports prepared in accordance with the NSFR, except for information constituting banking, commercial and other legally protected secrets of the Bank, together with the auditor's report on such reports;

5.10. information on indicators characterizing the financial position, income, expenses and profit or loss of the Bank in the amount of the balance sheet and profit and loss report drawn up in accordance with clause 12-4 of the Instruction on the Procedure for Drawing Up and Submitting Prudential Reports, Submitting Individual Accounting (Financial) Reports approved by the Resolution of the Board of the National Bank of the Republic of Belarus No. 172 dated October 31, 2006 as of April 1, July 1, October 1;

5.11. annual individual financial reports of the Bank together with the auditor's opinion on the financial reports in accordance with IFRS in full;

5.12. business plan (strategic development plan) of the Bank and report on the progress thereof as of January 1 of the year following the reporting year to the extent ensuring confidentiality of information containing banking, commercial and other secrets protected by law - in the form of a presentation or other form convenient for perception;

5.13. description of the risk management system and internal control system to the extent ensuring confidentiality of information containing banking, commercial and other secrets protected by law, information on officials responsible for risk management in the Bank and for internal control in the Bank, their appointment and release from these functions;

5.14. information stipulated by clause 7 of the Instruction on Risk Management in Outsourcing approved by the Resolution of the Board of the National Bank of the Republic of Belarus No. 1 dated January 8, 2020;

5.15. principles and standards of professional ethics;

5.16. the Bank's policy on information disclosure determined by local legal acts of the Bank;

5.17. description of the policy on exclusion of conflict of interests and conditions of its occurrence and the policy on remuneration of managers and employees of the Bank;

5.18. press releases, notices containing essential information on changes in activities, organisational structure, ownership structure and condition of the Bank;

5.19. URL of the National Bank's website;

5.20. currency exchange rates of the Bank;

5.21. information on hiring and dismissal of the head of the internal audit service;

5.22. the Bank's policy with regard to processing of personal data;

5.23. other information to be placed on the website in accordance with the laws and (or) local legal acts of the Bank;

5.24. other information related to the Bank's activities and disclosed by the Bank independently on a voluntary basis. The scope and expediency of placement of such information, taking into account the requirements of this Instruction, shall be agreed by the interested subdivision with the person supervising the work of the interested subdivision in accordance with the order on distribution of duties.

6. The information to be placed on the Internet site shall be sent to the Division via the Naumen Service Desk system (hereinafter - the Application).

Receipt, processing and posting on the website of the information received from the interested subdivisions shall be carried out by the employees of the Division no later than the working day following the day of sending the information, unless another deadline is specified by the interested subdivision. In case of impossibility to post the information or the need for technical revisions, the Division informs the interested subdivision that submitted the information for posting on the website by means of a reverse notification via the Naumen Service Desk system.

7. The information specified in clauses 5.1 - 5.5, 5.8, 5.12 - 5.18 of this Instruction shall be submitted to the Division within 3 (three) working days from the date of their change or performance of an action (occurrence of an event), the information about which is subject to posting on the website in accordance with this Instruction, or from the date when the Bank became aware of their change or performance of such action (occurrence of such event). Within one business day from the day of receipt of the above information, the Division shall update it on the Bank's website and send it by e-mail to the heads of structural subdivisions without an independent balance sheet (hereinafter - Banking Services Center, payment processing centre, Operation department) (persons substituting them), who shall update it on the information stands of BSC, PPC, OPERD within one working day from the day of receipt of the above information.

The information specified in clause 5.6, 5.7 of this Instruction shall be updated by the Division on the Bank's website within 5 working days from the date of submission of relevant information to the National Bank.

The information specified in clause 5.23 of this Instruction shall be updated by the Division within the terms established by the legislation of the Republic of Belarus or local legal acts of the Bank.

The information specified in clause 5.24 of this Instruction shall be updated by the Division no later than 5 working days from the date of their change or performance of an action (occurrence of an event), information about which is subject to posting on the website in accordance with this Instruction, or from the date when the Bank became aware of their change or performance of such action (occurrence of such event).

The information specified in clause 5.20 of this Instruction shall be provided by the Treasury Department on weekdays and weekends by e-mail to the address: [paritetrates@gmail.com](mailto:paritetrates@gmail.com).

The information specified in clause 5.9, 5.10 of this Instruction shall be placed by the Division on the Bank's website within the following terms:

annual reports prepared in accordance with the NSFR - not later than the 25th of April of the year following the reporting year;

information on indicators characterizing the financial position, income, expenses and profit or loss of the Bank as of April 1, July 1, October 1 - not later than the last working day of the month following the I, II and III quarters respectively.

The annual individual financial reports prepared in accordance with IFRS together with the auditor's opinion on the financial reports shall be posted by the Division on the Bank's website not later than July 31 of the year following the reporting year.

The information specified in clauses 5.9 - 5.11 of this Instruction shall be available on the Bank's website for a period of at least 5 years from the date of placement of the said information.

8. The annual individual accounting (financial) reports of the Bank prepared in accordance with the NSFR shall be published by the Bank in printed mass media in full, except for the notes thereto prescribed by the legislation, together with the auditor's opinion on such reports not later than April 25 of the year following the reporting year.

The information on indicators characterising the financial position, income, expenses and profit or loss of the Bank as of April 1, July 1, October 1 shall be published by the Bank in printed mass media in the scope of the balance sheet and profit and loss statement prepared in accordance with clause 12-4 of the Instruction on the procedure for preparation and submission of prudential reporting, submission of individual accounting (financial) reports, not later than the last working day of the month following the I, II and III quarters respectively.

The annual individual financial reports are published by the Bank in printed media in full, except for the notes, which comprise a summary of significant accounting policies and other explanatory information, together with the auditor's opinion on the financial reports not later than July 31 of the year following the reporting year.

When publishing the reports on the Bank's activities, the address of the relevant page of the Bank's website, where the reports on the Bank's activities in full are placed, shall be indicated.

The scope of published reports on the Bank's activities is not subject to change within one reporting year, except for cases when the Bank's accounting policy is amended in accordance with the legislation on accounting and reporting.

9. Reliability, completeness and relevance of the information posted in the relevant sections of the Bank's website shall be ensured by authorised employees of the relevant subdivisions of the Bank according to Annex 1 to this Instruction, who, if necessary, shall arrange preparation of updated information and submit it to the Division for further posting.

10. Responsibility for incomplete, untimely submission of information or submission of inaccurate information to the Division for subsequent posting on the Bank's website shall be borne by the heads of the subdivisions where such amendments and additions took place (responsible in accordance with Annex 1 to the Instruction).

11. Formation of up-to-date information on the M network disc for transmission to the BSC, PPC, OPERD and, if necessary, making changes to it, is carried out by the Division in accordance with this Instruction. Responsibility for incomplete and untimely placement of the provided information in the BSC, PPC, OPERD shall be borne by the head of the BSC, PPC, OPERD (person replacing him/her).

12. Upon request of interested users who are clients, counterparties, shareholders of the Bank, other beneficial owners, the Bank shall submit:

information provided by clause 5 of this Instruction;

a copy of the document confirming the state registration of the Bank;

information on the issuance, suspension, reinstatement, or revocation by the National Bank of special permits (licenses) for banking activities (hereinafter - banking licenses), including with regard to the performance of certain banking operations;

information on remuneration (fee) for the Bank's services.

Other interested users shall be provided by the Bank with the information specified in clause 12 of this Instruction on the basis of their written request containing the intention of the interested user to become a client, counterparty, shareholder of the Bank.

The information on the Bank shall be placed in a form convenient for interested users in publicly accessible areas of the premises where the Bank's clients are served and shall include:

information listed in clauses 5.1, 5.4 and 5.5 of this Instruction (except for the Charter of the Bank);

information on remuneration (fee) for the Bank's services;

URL of the Bank's website.

13. In accordance with the Law "On Business Entities" and the Charter of the Bank, the Supervisory Board of the Bank after approval by the Board of the Bank shall approve the list of information (documents) to be provided to persons entitled to participate in the General Meeting of Shareholders (hereinafter - the List).

14. Additional methods of disclosure of information about the Bank include meetings of the Bank's management with interested users, holding press conferences, meetings, participation in thematic exhibitions, publication of brochures, booklets, other advertising products, production of calendars, publications about the Bank, including in the Internet, as well as by any other means.

In order to promote the Bank's interests, provide information necessary for analysing the Bank's financial condition and/or making a decision on investing in its shares, the Bank holds presentations for interested users, other interested parties in the form of meetings (individual, collective), conferences, etc.

15. Being an issuer of securities, a professional participant of the securities market, the Bank discloses information mandatory for disclosure on the basis of special securities legislation.

16. Members of the Supervisory Board, the Audit Committee of the Bank shall be provided with full and reliable information on the Bank necessary for performance of their duties on the basis of local legal acts of the Bank. Disclosure of information on the Bank to an external auditor shall be carried out on the basis of an agreement.

17. In order to update the contact information on the Bank (telephone numbers, fax numbers, telex numbers, SWIFT, website) placed on the National Bank's website, the Document Support Unit of the Document Management Division of the Department of Support and Development of Business Infrastructure shall notify the National Bank of all changes in this information no later than 2 working days after the changes are made. The information on changes in telephone numbers, fax numbers, telex numbers, SWIFT, and website shall be submitted to the Department of Support and Development of Business Infrastructure no later than one working day after making changes therein: by the structural subdivision whose telephone and fax numbers are changed; by the External Payments Division of the International Operations Department on changes in telexes, SWIFT; by the Division on changes in the website.

18. The decision on disclosure of additional information (which in the Bank's opinion is essential for interested users) shall be prepared in writing by the Bank's employees who have received relevant instructions on its preparation, agreed with the person supervising the work of the interested subdivision in accordance with the order on distribution of duties, after which it shall be submitted to the Head of the Directorate (person replacing him/her) for its placement.

### CHAPTER 3

#### RESPONSIBILITY FOR THE CONTENT AND MAINTENANCE OF THE WEBSITE

19. The Department of Information Technologies shall ensure uninterrupted operation of the Bank's website in the Bank's area of responsibility.

20. Technical improvements and other significant changes in the structure and design of the Bank's website shall be carried out by an organisation with which the Bank has entered into a technical support agreement (hereinafter - a third-party organisation).

The Department of Information Technologies, in terms of the operability of the Bank's website and technical aspects, the Division, in terms of content, design, changes in the structure of the Bank's website, etc. are responsible for interaction with a third-party organisation

The interaction of the Division with a third-party organisation is carried out by sending requests, setting tasks via e-mail, or in an appropriate project and task management application, access to which is provided by the third-party organisation.

21. The subdivisions responsible for providing information according to Annex 1 to this Instruction shall be responsible for the accuracy of the information sent for posting.

#### CHAPTER 4 INTERNAL CONTROL MECHANISMS FOR PROPER DISCLOSURE OF INFORMATION

22. The control over compliance with the information disclosure procedure shall be exercised with regard to:

fulfilment of the procedures stipulated by this Instruction;

completeness and reliability of disclosed information, including compliance of information with actual data, decisions of management bodies and other collegial bodies of the Bank;

relevance of information and timeliness of its disclosure.

23. Preliminary control over completeness and reliability of information disclosed by the Bank shall be performed by the person responsible for provision of information with involvement, if necessary, of heads of other subdivisions of the Bank to agree on completeness and reliability of the information contained and terminology used. The fact of preliminary control shall be confirmed by the fact of sending the Application.

24. Current control over the information disclosed by the Bank shall be exercised by the head of the subdivision responsible for provision of information, including the Head of the Division (his/her substitute).

25. Subsequent control over the information disclosed by the Bank on a weekly basis is performed by the head of the subdivision responsible for providing information, as well as by the person supervising the activities of the subdivision in accordance with the order on distribution of duties.

If it is necessary to update the information disclosed by the Bank, the subdivision responsible for provision of information according to Annex 1 to this Instruction shall notify the Office thereof by sending an Application.

26. Control over the implementation of this Instruction and coordination of work with interested subdivisions shall be carried out by the Head of the Division (his/her substitute).

Control over changes in the current legislation of the Republic of Belarus regulating the information disclosure procedure, as well as amendments and additions to this Instruction shall be entrusted to the Head of the Division (his/her substitute).

#### CHAPTER 5 CONTENT AND MAINTENANCE OF THE BANK'S OFFICIAL ACCOUNTS IN SOCIAL NETWORKS

27. The administration of the Bank's official accounts in social networks is performed by the Division.

28. Development of information to be placed in the Bank's official accounts in social networks shall be carried out by the Division on the basis of information provided by the interested subdivisions. Posting of the material shall be carried out by the Division after agreeing with the interested subdivisions of the Bank in terms of their competences.

29. The information is placed in the Bank's official accounts according to the developed content plan based on the information provided by the interested subdivisions, which is approved by the Head of the Division.

CHAPTER 6  
PROCEDURE OF WORK WITH INFORMATION DISCLOSURE WITHIN THE RBSS

30. Organisation of the information disclosure process stipulated in clauses 6 - 7, 47 - 49, 52 of Annex 1 to the Instructions, within the framework of the remote banking servicing system (hereinafter - the RBSS) shall be carried out by the Digital Channels Development Department of the Digital Office (hereinafter - the DCDD).

31. The information stipulated by clauses 6 - 7, 52 of Annex 1 to the Instruction shall be synchronised by RBSS systems automatically with the relevant sections of the Bank's website.

32. If there is a need to place the information specified in clauses 47 - 49 of Annex 1 to the Instruction in the Bank's RBSS, the interested subdivisions shall send the relevant Application to the DCDD.

33. The information stipulated in clauses 47 - 49 of Annex 1 to the Instruction shall be posted by the DCDD in RBSS within the period not later than the next working day after receipt of the Application. In case of impossibility to post the information specified in this clause in the RBSS or if there is a need for technical modifications, the DCDD shall inform the subdivision that sent the Application about it by e-mail.

34. If there is a need to update (actualise) the information specified in clauses 47 - 49 of Annex 1 to the Instruction, placed in the RBSS, the interested subdivisions shall immediately send information on the changes to the DCDD by means of an Application. The DCDD shall update (actualise) the Application in RBSS not later than the next working day after receiving it.

35. Responsibility for incomplete, untimely submission of information or submission of inaccurate information to the DCDD for subsequent placement in the RBSS shall be borne by heads of subdivisions where such changes and additions occurred.

36. The Information Technology Department administers and ensures the functioning of RBSS system software and hardware in the Bank's area of responsibility.

37. Technical improvements and other significant changes to the structure and design of the Bank's RBSS shall be carried out by a third-party organisation. Responsible for interaction with the third-party organisation are: Information Technology Department - in terms of ensuring the functioning of the RBSS system software and hardware in the Bank's area of responsibility, the DCDD - in terms of designing any user interfaces (UX/UI) of the RBSS. Interaction between the DCDD and third-party organisations is carried out by sending requests, setting tasks via e-mail or in the relevant project and task management application, access to which is provided by the third-party organisation.