

“APPROVED”
by the Resolution of
Supervisory Board
of JSC “Bekabadtsement”
dated November 30, 2016

REGULATION
on criteria of referring information to categories of confidential and
commercial secret

I. GENERAL PROVISIONS

1. This regulation was formulated in accordance with laws of the Republic of Uzbekistan “On joint stock companies and protection of shareholders’ right”, “On limited liability and additional liability companies” “On commercial secret”, other instrument of legislation and corporate governance code approved by minutes of meeting of committee on improvement of the effectiveness of joint stock companies’ activity and corporate governance system development No.9 dated 31.12.2015 determine criteria referring information to categories of confidential and commercial secret.

2. The following main definitions are used in this regulation:

confidential information - documented information access to which is limited in accordance with legislation;

commercial secret – information having commercial value by virtue of non-public nature to which no free access on legal grounds and the owner of this information takes measures aimed protection of its confidentiality.

3. Procedure of arrangement of confidential information protection shall be determined by the Regulation on organization of confidential information protection by emitters. (reg.No.2081 dated 24.02.2010).

II. CRITERIA OF REFERRING INFORMATION TO CATEGORIES OF CONFIDENTIAL AND COMMERCIAL SECRET

Criteria of referring information to categories of confidential and commercial secret are following:

1. Scientific and technical, production and technological matters.

1.1. Information about communication system organization of the Company, including data on position of technical means and their technical characteristics, peculiarities of networking as well as planned actions on further development of network.

1.2. Information about purposes, programs of prospective scientific research.

1.3. Key ideas of research scientific works, course of performance of research and technological development conducted in the interest of company including in the sphere of software development.

1.4. Precise values of constructive characteristics of created items and optimal parameters of technological process under development.

1.5. Information about materials from which separate items are made.

1.6. Information about conditions and experimental results and network tests and communication equipment as well as facilities characteristics whereon they were carried out.

1.7. Information about peculiarities of design-engineering, artistic and engineering decisions affecting the interests of the Company and providing positive economic effect.

1.8. Information about security features of software and trademarks.

1.9. Analytical and characteristic curves, reflecting determined regularity and interrelation prospects for business development of the Company.

1.10. Information about status of computer facility and software used.

2. Administrative and managerial and personnel matters.

2.1. Information about implementation of methods of control of enterprise, principles of selection of managers and company, personnel.

2.2. Information about preparation, acceptance and execution of separate decisions of the management of the enterprise relating commercial, organizational, production, scientific and technical and other matters.

2.3. Information about facts, purposes, subject and results of conference and meeting of management body of the Company.

2.4. Information about size of payroll budget, incentive system, employee personal details; card-files of records of employment; orders relating personnel and their grounds;

3. Prospective planning of the activity.

3.1. Information about plans of partners relating expansion or curtailment of production of various types of products in the interests of Company. Engineering and economical, marketing basis of the such steps.

3.2. Information on plans relating investments, purchasing and sales.

3.3. Information about market strategy of the Company.

3.4. Information about methods of sales, marketing steps, (change of rate plans, initiating of additional discount, initiating of additional services, planned by promotional event⁶ peculiarities of advertising campaign etc.) planning by the Company as well as scope of finance for their carrying out.

3.5. Information about business performance.

3.6. Information about results of own marketing research, containing estimation of state and prospects for the development of market conditions.

3.7. Information about supposed purchasing of separate patents, licenses and samples of technics.

4. Financial and economic

4.1. Specific information, disclosing current budgetary indications of company's business-plan as regards direct costs, operation and non-operation costs, floating capital.

4.2. Specific information about planned and actual volume of capital investments financing, research work and expenditures connected with introduction of new technology.

4.3. Specific information about size and conditions of investment/attraction of funds to credit institutions.

4.4. Information about conditions of long-term finance projects (financial leasing, long-term crediting etc.) conclusion.

- 4.5. Information about scope of new projects and advertising campaigns financing.
- 4.6. Information about special deals and conditions of payment on barter transactions, compensation transactions conditions.
- 4.8. Information about status of bank accounts of the Company and current banking transactions thereon.

5. Trade and economic matters

- 5.1. Information about preparation and results of negotiations with business partners.
- 5.2. Information exposing position of Company's representatives during negotiations, which disclosure may inflict damage to the Company.
- 5.3. Information about time limits prescribed for process and conclusion of deal, its terms as well as factors influencing deal.
- 5.4. Information about receivable, worked out orders and propositions of firms.
- 5.5. Information about internal and foreign customers, contractors, suppliers, clients, consumers, buyers, companions, sponsors, brokers and other partners, business relationship of enterprise, premature distribution of information whereof may inflict damage to the Company.
- 5.6. Information about Company's competitors, which are not contained in open information.
- 5.7. Information about favorable suppliers of the items and their accessories, giving to item a new consumer appeal.
- 5.8. Information about method of calculation with business partners, structure, price level for products and sizes of discount provided to the Company.

6. Security matters.

- 6.1. Information about procedures and status of protection of commercial secret in the Company.
- 6.2. Information about comprising commercial secret of partner enterprises and submitted to the company under confidentiality agreements.
- 6.3. Information about confidentiality, which is required by the partner if it is mentioned in agreement or contract.
- 6.4. Information about scientific and technical and economic issues, in respect of third parties, received by non-official way or under agreements, having on regulation of confidentiality compliance.
- 6.5. Information about procedures of interaction of operating personnel with ministries and authorities of the Russian Federation.
- 6.6. Information about procedure of access procedures to the facilities of the Company, code combination of burglar alarm.
- 6.7. Information about procedure and condition of security arrangements, access mode, signal system.
- 6.8. Executive body has right to make amendments to these criteria.

7. FINAL PROVISIONS

Persons who are guilty of violation of requirements of this Regulation, bear responsibility as set forth by law