

Approved
by the shareholders' extraordinary general
meeting of the “APRICOT CAPITAL”
Closed joint stock company
Executive Director Vachik Gevorgyan



11 October 2022

**“APRICOT CAPITAL”
CLOSED JOINT STOCK COMPANY**

**Regulation
on Protection of Work Related Information**

YEREVAN 2022

1. GENERAL PROVISIONS

1.1. These Regulations define the rules for publication, disclosure, protection and provision of work related information by "APRICOT CAPITAL" Closed Joint Stock Company (hereinafter referred to as the Company).

1.2. The entire process of publication, protection and provision of the Company's work related information is regulated in accordance with the Civil Code of the Republic of Armenia, the Law of the Republic of Armenia "On Securities Market", other normative legal acts adopted on its basis, as well as the internal legal acts of the Company.

1.3. The purpose of this Regulation is:

1.3.1. To ensure the proper protection and provision of information relating to the Company's existing and potential customers,

1.3.2. To prevent possible factors that could disrupt the process of securing and providing such information and cause harm to existing and potential customers.

1.4. The main concepts used in this Regulation have the following meanings:

Work related information. Information on the customer's accounts that have become known to the Company in the course of servicing the customers, information on the operations, executed upon the assignment or to the benefit of the customer, as well as commercial or work related secret, information on the any activity plan or on the design, invention, industrial design or utility model of the customer and any information thereof, which the customer intended to keep secret, and the Company was or should have been aware of such intention,

Customer. a person who use the investment and non-core services provided by the Company or applied to the Company in order to use these services,

Law. The law of the RA on Securities Market,

Disclosure of work related information. the publication of that information in verbal or written form to any person, state body or official in the cases prescribed by the Law.

1.5. The information related to the customer, provided to the Central Bank in regard with carrying out control over the Company is considered work related information.

1.6. Other concepts used in this Regulation have the meaning defined by the Law:

2. DISCLOSURE OF WORK RELATED INFORMATION

2.1. Disclosure of work related information shall be considered the publication of that information (or any medium thereof) in verbal or written form, through the mass media or otherwise, making such information available to a third person or spreading it, any direct or indirect provision of any opportunity to any third person to obtain such information (authorizing, not hindering or making possible the disclosure of such information by the breach of the procedure for keeping such information).

2.2. Any person, state body or official shall be prohibited to disclose any work related information, which it was confided in or which became known thereto in the course of its service or job or provided to as prescribed by this Regulation and the Law, except for cases provided in the clause 2.3 of this Regulation. The Company, its executive officer and employees shall be obliged to reject any motion or request to provide work related information, if it is not submitted in accordance with the provisions of this Regulation and the Law.

2.3. The following shall not be considered a disclosure of work related information and shall not be prohibited by clause 2.2 of this Regulation.

2.3.1. Communication or provision of work related information by the Company to any persons or organizations that render legal, accounting and other advisory or representative services, or perform certain works for Company, such information and to abstain from its disclosure,

2.3.2. Disclosure of information related only to the customer, if such disclosure was made through the written permission or through a verbal permission thereof granted in the court,

2.3.3. Provision of work related information to the Central Bank in the course of carrying out control over the activities of the Company,

2.3.4. Provision of work related information in accordance with the requirements prescribed by the Civil Procedure Code of the Republic of Armenia, the Criminal Procedure Code of the Republic of Armenia, the Chapter 31.7 of the Administrative Procedure Code of the Republic of Armenia and the Law On Confiscation of Illegally Originated Property of the Republic of Armenia.

2.3.5. Provision of information, included in the register of the nominal securities holders, to the issuer in cases prescribed by law, other legal acts or persons offering transfer of securities as prescribed by the Law;

2.3.6. Provision of work related information to competent authorities of a foreign country in accordance with the law and international agreement, cooperation agreement.

2.3.7. Provision of information defined by sub-paragraph 2.6 of Article 98 of the Law to the RA General Prosecutor's Office, the RA Investigative Committee, the RA Anti-Corruption Committee, the RA National Security Service, the Commission for the Protection of Competition, the RA State Revenue Committee and the RA Police, along with the procedure for providing this information is defined by the RA government. The information is provided by providing access to the electronic information system. In cases where obtaining information from the system is not possible or when information not entered into the system is required, a written response is submitted to a request from the relevant body. The information is provided free of charge, except for the information provided in paper form. The procedure and amount of compensation for such information are determined by the decision of the Government of the Republic of Armenia, outlining the process for information provision.

2.3.8. Provision of information to the Corruption Prevention Commission in cases defined by the law "On Corruption Prevention Commission".

2.4. The company is prohibited from disclosing to customers the court decision made in accordance with the Code of Administrative Procedure of the Republic of Armenia, as well as the fact of providing work-related information to the tax authority.

3. THE PROTECTION OF WORK RELATED INFORMATION

3.1. The proper protection of information related to the Company's customers and the services provided to them is managed through the Company's financial and technical resources and is accessible to relevant employees.

3.2. The company providing investment services keeps work related information in accordance with clauses 2 and 3.

3.3. According to this Regulation the executive officers, employees, former executive officers and employees of the Company, as well as the persons and organisations that are rendering or have rendered services or are performing or have performed works for the Company, shall be prohibited to disclose work related information confided to or known by them in the course of their service or work, as well as to use such information to the benefit of their or any third person's (or persons') interests or to provide a direct or indirect opportunity to the third person(s) to use such information (authorizing, not hindering or making possible the disclosure of such information by the breach of the procedure of keeping such information).

3.4. The company shall be obliged to undertake such technical measures and define such organisational rules that are necessary to ensure the proper keeping of work related information.

3.4.1. The use of computers by the Company's employees and other technical means serving as information carriers should be restricted to outsiders. Computers should be accessible only through power-on passwords. The specified password must consist of at least eight characters, including numbers, both uppercase and lowercase letters of the Latin alphabet, and symbols. Simultaneously, it is prohibited to store the password together with the technical equipment or the computer.

4. PROVISION OF WORK RELATED INFORMATION

4.1. A person (other than the Company), that has been confided in or aware of any work related information in the course of its service or work, shall have no right to provide such information to any other persons.

4.2. The work related information about the customers of the Company that the Central Bank has obtained in the course of carrying out control over the Company may be provided only in accordance with this Regulation.

4.3. The company discloses work-related information required in civil cases solely based on a court decision in accordance with the RA Civil Procedure Code. The decision must specify both the person and the relevant information subject to disclosure. It is forbidden to disclose work related information about individuals not explicitly mentioned in the above-mentioned decision.

4.4. The provision of work related information in criminal proceedings is regulated by the RA Criminal Procedure Code.

4.5. In the cases defined by the Law of the Republic of Armenia "On Confiscation of Property of Illegal Origin", work related information is provided to the competent authority based on a court decision.

4.6. The provision of work related information by the Company to the heirs (successors) of the customer is carried out in accordance with the procedure established by the Civil Code of the Republic of Armenia.

5. FINAL PROVISIONS

5.1. All additions and changes to this Procedure are approved by the Meeting (unless otherwise provided by the Company's Charter) and enter into force upon approval by the Meeting.