Approved by the Shareholders' meeting of
"Invia Investments"CJSC
Dated on 05/05/2023

Chief Director of "Invia Investments" CJSC
Anahit Shakaryan



"Invia Investments"

Closed Joint Stock Company

Content

1. General terms 3
2. Publication of service information 3
3. Prohibition of use of service information 3
4. Provision of service information in civil and criminal cases and to the Client's heirs (successors) 4
5. Technical measures aimed at maintaining service information by the company 4
6. Liability measures applied in case of publication and/or use of Service information by Company Employees in violation of the requirements of these rules 4
7. Final provisions 4

The rules governing the retention of service information of “Invia Investments” closed joint stock company (hereinafter referred to as “the Company”) have been drawn up in accordance with the legislation regulating the securities market of the Republic of Armenia, the normative legal acts adopted by the Central Bank of the Republic of Armenia and the Company's charter.

1. General terms

1.1. The concepts used in these rules have the following meaning:
"**Law**" - Law of the Republic of Armenia "On the Securities Market".
"**Customer**" - a person who uses the services provided by the Company.
"**Employee**" - a person who, on the basis of an employment contract, performs certain work for the Company according to a certain profession, qualification or position.
"**Service information**" - Any information about the Customer's accounts that became known to the Company in connection with providing its services to the Customer, information about the operations performed on the basis of Customer's assignment or in favor of the Customer, as well as the Customer's trade or service secret, information about any activity plan or development, invention, industrial design or utility model and any other related information that the Customer intended to keep confidential and the Company knew or should have known of that intention.

2. Publication of service information

2.1. Publication of service information by the Company's Employees, as well as by persons who were previously Company's Employees, is prohibited, except for the cases provided for in paragraph 3 of this clause. The Company, its manager or other Employee are obliged to refuse any request or demand for the provision of service information, if it was not submitted in accordance with the provisions of the RA Law "On Securities Market".

2.2. Publication of service information is considered to be publicizing that information (or any of its media) orally or in writing through the mass media or otherwise, making it known or distributing it to a third party, directly or indirectly providing the opportunity for third parties to obtain such information (permitting, not hindering or making possible its publication as a result of violation of the order of retention of that information).

2.3. Publication of service information is not considered and is not prohibited by paragraph 1 of this clause:

a) Disclosing or providing service information to persons and organizations providing legal, accounting, other consulting or representative services to the Company or performing certain works for it, if it is necessary to provide these services or perform the works, and if these persons and organizations have given a written commitment to retain the information and refrain from publishing it,
b) Publication of information related to the Customer only with the latter’s written consent or verbal permission given in court,
c) Provision of service information to the Central Bank in the manner prescribed by law during the implementation of control over the Company,
d) Provision of service information in accordance with the requirements of the Civil Procedure Code of the Republic of Armenia, the Criminal Procedure Code of the Republic of Armenia, Chapter 31.7 of the Administrative Procedure Code of the Republic of Armenia, the Law of the Republic of Armenia "On Confiscation of Property of Illegal Origin",
e) Provision of information to the Corruption Prevention Commission in the cases defined by the law "On Corruption Prevention Commission",
f) Provision of service information in other cases permitted by law.

3. Prohibition of use of service information

3.1. Employees of the Company, as well as those persons who were previously Employees of the Company, are prohibited from publishing Service information entrusted or made known to them in connection with the service or work, as well as from using them for their own personal or third-party’s interests, directly or indirectly enabling such use by third parties (permitting,

not hindering, or making possible its publication as a result of violation of the order of retention of that information).

4. Provision of service information in civil and criminal cases and to the Client's heirs (successors)

4.1. The Company provides the Service information required in civil cases only on the basis of a decision made by the court in accordance with the procedure established by the Civil Procedure Code of the Republic of Armenia, in which the person and the information related to him that are subject to provision must also be specified.

4.2. The provision of service information in criminal cases is regulated by the Criminal Procedure Code of the Republic of Armenia.

4.3. The provision of Service information by the Company to the Customer's heirs (successors) is carried out in accordance with the procedure established by the Civil Code of the Republic of Armenia.

5. Technical measures aimed at maintaining service information by the company

5.1. In order to exclude the illegal publication and/or use of service information, the head of the executive body of the Company is obliged to undertake and follow the implementation of the following measures:

a) All the Company's computers are assigned individual access codes, which are known exclusively to the Company's Employees who work with the given computer,
b) Withdrawal of electronic information from the Company through electronic media, e-mail or other information exchange options is carried out exclusively by an employee authorized to provide information with a corresponding power of attorney or with the prior consent of the head of the executive body of the Company,
c) Any documents containing service information must be retained in such a way that no one other than the Company's Employees has the opportunity to copy them, photograph them or take information from them in any other way. Such documents may be left on the table or in any other open place only when any of the Company's Employees are present at the place. Otherwise, such documents are kept in the shelves provided for that purpose.

6. Liability measures applied in case of publication and/or use of Service information by Company Employees in violation of the requirements of these rules

6.1. The publication and/or use of Service information by the Company's Employees in violation of the requirements of these rules is a gross violation of labor discipline, and any of the following disciplinary penalties may be applied for it at the Company's discretion:

a) severe reprimand,
b) termination of employment contract.

7. Final provisions

7.1. Amendments and additions to this regulation are approved by the general meeting of the Company's shareholders (unless otherwise stipulated by the Company's charter) and enter into force upon proper notification to the Company's Employees, which must be carried out within five working days from the moment of approval by the competent authority.

7.2. These rules come into force from the moment of state registration of the Company.