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LIST OF CATEGORIES OF SECURITIES

**in the official list of the stock exchange
operating in the territory of the Republic
of Kazakhstan, for which the tax benefits
are provided**

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List of categories of securities in the official list of the stock exchange operating in the territory of the Republic of Kazakhstan, for which the tax benefits are provided

Item No.	Instrument name	Type of benefit	Norm of the Tax Code 2025 (valid from 01/01/2026)	Note
CIT benefits (for legal entities that are residents of the Republic of Kazakhstan)**				
1.	All securities*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 5) of part one of para 2 of Art. 337, part two of para 2 of Art. 337	- Sale on the stock exchange by open trading, presence on the sale day in the official lists of this stock exchange - Except for value gains on government securities (excluding those issued by the RK Ministry of Finance, from 01/01/2031 – on all GS) - In the amount of 50% of the income received from the value gains on government securities issued by the RK Ministry of Finance (valid until 01/01/2031)
2.	Debt securities	Right to reduce taxable income by the interest	Subpara 2) of part one of para 2 of Art. 337	- Except for interest on government securities (excluding those issued by the RK Ministry of Finance, from 01/01/2031 – on all GS) - In the amount of 50% of the interest received on government securities issued by the RK Ministry of Finance (valid until 01/01/2031)
3.	Debt securities issued by a resident legal entity*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 8) of part one of para 2 of Art. 337	- Except for taxpayers that are residents of a state with preferential taxation - On the day of sale of the securities, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs) - The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
4.	Shares issued by a resident legal entity*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 7) of part one of para 2 of Art. 337	- On the day of sale of the shares, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs)

****The right, during the calendar year in which the income was paid and the calendar year following it, to submit to the tax agent who withheld the IIT from such income an application and supporting documents based on which the tax agent recalculates the income subject to taxation (para 2 of Art. 400 of the Tax Code 2025)**

			- The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
5. Government bonds issued by the RK Ministry of Finance*	The right to reduce taxable income by an amount equal to 50 percent of the received interest, 50 percent of the amount of income from value gains upon sale	Part three of para 2, Art. 337	- The right to reduce taxable income is valid until 01/01/2031.
6. Securities issued by NMH Baiterek JSC*	Right to reduce taxable income by the interest, amount of income from value gains upon sale	Subparas 4), 9) of part one of para 2 of Art. 337	- The right to reduce taxable income is valid until 01/01/2031.
7. Agency bonds*	Right to reduce taxable income by the interest, amount of income from value gains upon sale	Subparas 3), 6) of part one of para 2 of Art. 337	-
8. Shares of Astana Hub participants*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 10) of part one of para 2 of Art. 337	- The right to reduce taxable income is valid until 01/01/2029.
9. Shares of participants that are legal entities registered in the AIFC*	Exemption from CIT on income from value gains upon sale and in the form of dividends on shares	Subparas 2), 4) of part one of para 7 of Art. 6 of the RK Constitutional Law "On the AIFC"	- The right of exemption from tax is valid until 01/01/2066.
CIT benefits for non-resident legal entities			
10. All securities*	Exemption from taxation of interest and dividends	Subpara 7) of part one of Art. 681	- Presence in the official list of the RK stock exchanges on the date of accrual of remuneration and dividends - Simultaneous compliance with the following criteria for shares and UIT units: 1. volume of executed transactions on exchanges in the RK territory is at least 25 mln tenge per calendar month (for UIT units – at least 20 million tenge per month); 2. the number of executed transactions on exchanges in the RK territory is at least 50 per calendar month (for UIT units – at least 10 per month); 3. placement by conducting an IPO or SPO or free float of at least 10%

****The right, during the calendar year in which the income was paid and the calendar year following it, to submit to the tax agent who withheld the IIT from such income an application and supporting documents based on which the tax agent recalculates the income subject to taxation (para 2 of Art. 400 of the Tax Code 2025)**

- Volume of placement of debt securities within one issue on the stock exchange by open trading method is at least 1 bln tenge (excluding those bought out by the issuer, the state, affiliated persons and major (over 10%) holders of the free volume) – the criteria set by the Resolution of the RK Government dated October 2, 2025, No.818

11. Debt securities	Exemption from taxation of the amounts of accumulated (accrued) interest paid upon their purchase by the resident buyers (<i>accumulated coupon income</i>)	Subpara 1) of part one of Art. 681	-
12. Debt securities issued by a resident legal entity*	Exemption from taxation of income from value gains upon sale	Subpara 8) of part one of Art. 681	- Except for taxpayers that are residents of a state with preferential taxation - On the day of sale of the securities, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs) - The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
13. Government securities*	Exemption from taxation of interest, income from value gains upon sale	Subpara 14) of part one of Art. 681	-
14. Agency bonds*	Exemption from taxation of interest, income from value gains upon sale	Subpara 14) of part one of Art. 681	-

IIT benefits (for individuals)

15. All securities*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 6) of para 1 of Art. 400	- Sale on the stock exchange by open trading, presence on the sale day in the official lists of this stock exchange
16. All securities*	Right to reduce taxable income at source by the amount of interest**	Subpara 18) of para 1 of Art. 400, subpara 3) of Art. 430	- Presence in the official list of the RK stock exchanges on the date of interest accrual

****The right, during the calendar year in which the income was paid and the calendar year following it, to submit to the tax agent who withheld the IIT from such income an application and supporting documents based on which the tax agent recalculates the income subject to taxation (para 2 of Art. 400 of the Tax Code 2025)**

17. All securities*	Right to reduce taxable income by the amount of dividends**	Subpara 24) of para 1 of Art. 400, subpara 13) of Art. 436	- Presence in the official list of the RK stock exchanges on the date of interest accrual - Simultaneous compliance with the following criteria for shares and UIT units: 1. volume of executed transactions on exchanges in the RK territory is at least 25 mln tenge per calendar month (for UIT units – at least 20 million tenge per month); 2. the number of executed transactions on exchanges in the RK territory is at least 50 per calendar month (for UIT units – at least 10 per month); 3. placement by conducting an IPO or SPO or free float of at least 10% - the criteria set by the Resolution of the RK Government dated October 2, 2025, No.818
18. Debt securities issued by a resident legal entity*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 5) of para 1 of Art. 400	- Except for taxpayers that are residents of a state with preferential taxation - On the day of sale of the securities, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs) - The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
19. Debt securities issued by a resident legal entity	Right to reduce taxable income at source by the amount of interest**	Subpara 18) of para 1 of Art. 400, subpara 2) of Art. 430	-
20. Shares issued by a resident legal entity*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 4) of para 1 of Art. 400	- On the day of sale of the shares, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs) - The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
21. Government securities*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 1) of para 1 of Art. 400	-

****The right, during the calendar year in which the income was paid and the calendar year following it, to submit to the tax agent who withheld the IIT from such income an application and supporting documents based on which the tax agent recalculates the income subject to taxation (para 2 of Art. 400 of the Tax Code 2025)**

22. Agency bonds*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 1) of para 1 of Art. 400	-	
23. Units of open-end and interval unit investment trusts*	The right to reduce taxable income by the amount of income from value gains upon sale	Subpara 3) of para 1 of Art. 400	-	
24. Shares of participants that are legal entities registered in the AIFC*	Exemption from IIT on income from value gains upon sale and in the form of dividends on shares	Subparas 2), 4) of part one of para 7 of Art. 6 of the RK Constitutional Law "On the AIFC"	-	The right of exemption from tax is valid until 01/01/2066.01.01.2066 r.

****The right, during the calendar year in which the income was paid and the calendar year following it, to submit to the tax agent who withheld the IIT from such income an application and supporting documents based on which the tax agent recalculates the income subject to taxation (para 2 of Art. 400 of the Tax Code 2025)**

IIT benefits (for non-resident individuals)

25. All securities*	Exemption from taxation of income from value gains upon sale	Subpara 4) of part one of Art. 681	-	Sale on the stock exchange by open trading, presence on the sale day in the official lists of this stock exchange
26. All securities*	Exemption from taxation of interest and dividends	Subpara 7) of part one of Art. 681	-	- Presence in the official list of the RK stock exchanges on the date of accrual of remuneration and dividends - Simultaneous compliance with the following criteria for shares and UIT units: 1. volume of executed transactions on exchanges in the RK territory is at least 25 mln tenge per calendar month (for UIT units – at least 20 million tenge per month); 2. the number of executed transactions on exchanges in the RK territory is at least 50 per calendar month (for UIT units – at least 10 per month); 3. placement by conducting an IPO or SPO or free float of at least 10% - Volume of placement of debt securities within one issue on the stock exchange by open trading method is at least 1 bln tenge (excluding those bought out by the issuer, the state, affiliated persons and major (over 10%) holders of the free volume) - the criteria set by the Resolution of the RK Government dated October 2, 2025, No.818

* Qualifying securities according to part three of para 4 of Art. 252 and part four of para 4 of Art. 387 of the Tax Code 2025

** According to subpara 1) of para 1 of Art. 255 of the Tax Code 2025, for the purposes of determining the taxable income, the total annual income of a taxpayer (legal entity that is resident of the Republic of Kazakhstan) is subject to reduction by the amount of dividends

27. Debt securities	Exemption from taxation of the amounts of accumulated (accrued) interest paid upon their purchase by the resident buyers (<i>accumulated coupon income</i>)	Subpara 1) of part one of Art. 681	-
28. Debt securities issued by a resident legal entity*	Exemption from taxation of income from value gains upon sale	Subpara 8) of part one of Art. 681	- Except for taxpayers that are residents of a state with preferential taxation - On the day of sale of the securities, the taxpayer has owned them for more than 3 years - The issuer is not a subsoil user (except for those that only have the right to extract groundwater and/or common minerals for their own needs) - The property of subsoil users in the value of the issuer's assets on the day of sale is no more than 50% (the procedure for determining the share is approved by the RK Ministry of Finance)
29. Government securities*	Exemption from taxation of interest, income from value gains upon sale	Subpara 14) of part one of Art. 681	-
30. Agency bonds*	Exemption from taxation of interest, income from value gains upon sale	Subpara 14) of part one of Art. 681	-

* Qualifying securities according to part three of para 4 of Art. 252 and part four of para 4 of Art. 387 of the Tax Code 2025

** According to subpara 1) of para 1 of Art. 255 of the Tax Code 2025, for the purposes of determining the taxable income, the total annual income of a taxpayer (legal entity that is resident of the Republic of Kazakhstan) is subject to reduction by the amount of dividends