For the nine months period ended 30 September 2022

1. GENERAL INFORMATION

Kcell JSC (the "Company") was established as a limited liability partnership (GSM Kazakhstan OAO Kazakhtelecom LLP) on 1 June 1998 to design, construct and operate a cellular telecommunications network in the Republic of Kazakhstan, using the GSM (Global System for Mobile Communications) standard.

The Company's registered address is Alimzhanova 51, Almaty, the Republic of Kazakhstan.

On 25 December 2010, the Committee of Communications, Informatization and Information under the Ministry of Investments and Development of the Republic of Kazakhstan signed an addendum to the existing GSM license, which provided the Group with a right to operate a 3G network. In December 2010, the Group launched 3G services in Nur-Sultan and Almaty. As at 1 January 2015, the Group provided all locations with a population of over 10,000 people with mobile services using UMTS/WCDMA based on the terms of the addendum.

On 27 August 2012, the Ministry of Justice registered the Company as a Joint Stock Company. Under Kazakhstani law, upon the conversion, retained earnings as at the date of the conversion became share capital of the Company and ceased to be available for distribution to shareholders.

In 2016 the Group paid 26,000 million tenge for LTE radio frequencies. On 1 March 2016, the Group launched LTE in its network on the previously granted frequencies.

On 13 December 2012, the Company successfully completed its offering of Global Depositary Receipts at the London Stock Exchange and common shares at the Kazakhstan Stock Exchange. On 14 June 2021, the Group officially completed delisting of Global Depositary Receipts (GDR) on LSE and Astana International Exchange (AIX).

As at 30 September 2022 and 31 December 2021 the Company is controlled by Kazakhtelecom JSC. Kazakhtelecom JSC is controlled by the Government of the Republic of Kazakhstan through Sovereign Wealth Fund "Samruk-Kazyna" JSC ("Samruk-Kazyna") which owns 51% of Kazakhtelecom's controlling shares.

As at 30 September 2022 and 31 December 2021, the shareholders of the Company are presented as follow:

	30 September 2022 (unaudited)	31 December 2021
Kazakhtelecom JSC	51.00%	51.00%
PIONEER TECHNOLOGIES S.A.R.L.	14.87%	14.87%
First Heartland Jusan Bank JSC	9.08%	9.08%
Single accumulative pension fund JSC	7.06%	7.06%
Asel Invest LLP	2.42%	-
Raiffeisenbank JSC	1.54%	1.54%
Dzhusai Invest LLP	1.44%	-
Freedom finance Europe LTD	1.32%	-
Other	11.27%	16.45%
	100.00%	100.00%

As at 30 September 2022 and 31 December 2021, the Company has the following principal subsidiaries:

	30 September	
	2022	31 December
	(unaudited)	2021
KazNet Media LLP	100%	100%

The accompanying interim condensed consolidated financial statements include the financial statements of Kcell JSC and its subsidiary (further referred to as "the Group").

The interim condensed consolidated financial statements were authorised for issue by the Chairman of the Management Board on 28 October 2022.

2. BASIS OF PREPARATION

The interim condensed consolidated financial statements for the three and nine months ended 30 September 2022 have been prepared in accordance with IAS 34 *Interim Financial Reporting*.

The interim condensed consolidated financial statements do not include all the information and disclosures required in the annual financial statements, and should be read in conjunction with the Group's annual consolidated financial statements as at 31 December 2021 and for the year then ended. The interim condensed consolidated financial statements are presented in Kazakhstan tenge, and all amounts are rounded to nearest millions, except otherwise indicated.

Going concern

The interim condensed consolidated financial statements have been prepared on a going concern basis, which assumes continuation of the course of business, realization of assets and settlement of liabilities in the normal course of business.

Foreign currency translation

Transactions in foreign currencies are initially recorded by the Group entities at their respective functional currency spot rates at the date the transaction first qualifies for recognition. Monetary assets and liabilities denominated in foreign currencies are retranslated at the official rate established by the "KASE" and published by the National Bank of the Republic of Kazakhstan (the "NBRK") at the reporting date. All differences are recognized in the interim condensed consolidated statement of comprehensive income.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or profit or loss are also recognised in OCI or profit or loss, respectively).

The following table summarises the foreign currency exchange rates for tenge:

	30 September 2022	31 December 2021
US dollar	476.89	431.67
Euro	462.20	487.79
Russian ruble	8.31	5.77

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

New and amended standards and interpretations

The accounting policies adopted in the preparation of the interim condensed consolidated financial statements are consistent with those followed in the preparation of the Group's annual consolidated financial statements for the year ended 31 December 2021, except for the adoption of new standards effective as at 1 January 2022. The Group has not early adopted any standard, interpretation or amendment that has been issued but is not yet effective.

Several amendments apply for the first time in 2022, but do not have an impact on the interim condensed consolidated financial statements of the Group.

Onerous Contracts - Costs of Fulfilling a Contract - Amendments to IAS 37

An onerous contract is a contract under which the unavoidable costs (i.e., the costs that the Group cannot avoid because it has the contract) of meeting the obligations under the contract exceed the economic benefits expected to be received under it.

The amendments specify that when assessing whether a contract is onerous or loss-making, an entity needs to include costs that relate directly to a contract to provide goods or services include both incremental costs (e.g., the costs of direct labour and materials) and an allocation of costs directly related to contract activities (e.g., depreciation of equipment used to fulfil the contract as well as costs of contract management and supervision). General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract.

The amendments had no impact on the interim condensed consolidated financial statements of the Group as there were no such onerous contracts arisen during period.

Reference to the Conceptual Framework – Amendments to IFRS 3

The amendments replace a reference to a previous version of the IASB's Conceptual Framework with a reference to the current version issued in March 2018 without significantly changing its requirements. The amendments add an exception to the recognition principle of IFRS 3 Business Combinations to avoid the issue of potential 'day 2' gains or losses arising for liabilities and contingent liabilities that would be within the scope of IAS 37 Provisions, Contingent Liabilities and Contingent Assets or IFRIC 21 Levies, if incurred separately. The exception requires entities to apply the criteria in IAS 37 or IFRIC 21, respectively, instead of the Conceptual Framework, to determine whether a present obligation exists at the acquisition date.

The amendments also add a new paragraph to IFRS 3 to clarify that contingent assets do not qualify for recognition at the acquisition date.

These amendments had no impact on the interim condensed consolidated financial statements of the Group as there were no contingent assets, liabilities and contingent liabilities within the scope of these amendments arisen during the period.

Property, Plant and Equipment: Proceeds before Intended Use – Amendments to IAS 16

The amendment prohibits entities from deducting from the cost of an item of property, plant and equipment, any proceeds of the sale of items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognises the proceeds from selling such items, and the costs of producing those items, in profit or loss.

These amendments had no impact on the interim condensed consolidated financial statements of the Group as there were no sales of such items produced by property, plant and equipment made available for use on or after the beginning of the earliest period presented.

IFRS 1 First-time Adoption of International Financial Reporting Standards – Subsidiary as a first-time adopter

The amendment permits a subsidiary that elects to apply paragraph D16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported in the parent's consolidated financial statements, based on the parent's date of transition to IFRS, if no adjustments were made for consolidation procedures and for the effects of the business combination in which the parent acquired the subsidiary. This amendment is also applied to an associate or joint venture that elects to apply paragraph D16(a) of IFRS 1.

These amendments had no impact on the interim condensed consolidated financial statements of the Group as it is not a first-time adopter.

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

New and amended standards and interpretations (continued)

IFRS 9 Financial Instruments – Fees in the '10 per cent' test for derecognition of financial liabilities

The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either the borrower or lender on the other's behalf. There is no similar amendment proposed for IAS 39 Financial Instruments: Recognition and Measurement.

These amendments had no impact on the interim condensed consolidated financial statements of the Group as there were no modifications of the Group's financial instruments during the period.

IAS 41 Agriculture – Taxation in fair value measurements

The amendment removes the requirement in paragraph 22 of IAS 41 that entities exclude cash flows for taxation when measuring the fair value of assets within the scope of IAS 41.

These amendments had no impact on the interim condensed consolidated financial statements of the Group as it did not have assets in scope of IAS 41 as at the reporting date.

4. SEGMENT INFORMATION

The Group's main operations are concentrated in the Republic of Kazakhstan and are mainly represented by provision of mobile communication services. The Group identifies the segment in accordance with the criteria set in IFRS 8 *Operating Segments* and based on the way the operations of the Group are regularly reviewed by the chief operating decision maker to analyse performance and allocate resources among business units of the Group.

The Group's Chairman of the Management Board has been determined as the chief operating decision-maker ("CODM"). The CODM reviews the Group's internal reporting in order to assess performance and allocate resources. Segment performance is evaluated based on operating profit or loss and is measured consistently with operating profit or loss in the consolidated financial statements prepared in accordance with IFRS. Management has determined a single operating segment being mobile communication services based on these internal reports.

5. SHARE CAPITAL AND EARNINGS PER SHARE

Share capital of the Group is as follows:

	30 September 2022		31 December 2021	
		Number of		Number of
	Share	shares	Share	shares
Kazakhtelecom JSC PIONEER TECHNOLOGIES	51.00%	102,000,000	51.00%	102,000,000
S.A.R.L	14.87%	29,745,215	14.87%	29,745,215
First Heartland Jusan Bank JSC	9.08%	18,167,753	9.08%	18,167,753
Single accumulative				
pension fund JSC	7.06%	14,144,273	7.07%	14,144,273
Asel Invest LLP	2.42%	4,836,536	0%	-
Raiffeisenbank JSC	1.54%	3,070,664	1.54%	3,070,664
Dzhusai Invest LLP	1.44%	2,872,915	-	-
Freedom finance Europe LTD	1.32%	2,634,148	-	-
Other	11.27%	22,528,496	16.44%	32,872,095
	100.00%	200,000,000	100.00%	200,000,000

The total authorized number of ordinary shares is 200,000,000 shares with a par value of 169 tenge per share, all of which are issued and fully paid.

In 2021 the Group obtained loans from First Heartland Jusan Bank JSC at interest rate lower than market rate and recognised discount in the amount of 1,260 million tenge as additional paid in capital (*Note 12*).

5. SHARE CAPITAL AND EARNINGS PER SHARE (continued)

The calculation of basic and diluted earnings per share is based on the following data:

	Three mont	hs ended	Nine mont	hs ended
_	30 September	30 September	30 September	30 September
In millions of tenge	2022	2021	2022	2021
Profit for the period attributable to				
equity shareholders	13,102	9,326	32,459	24,953
Weighted average number of	•		•	
ordinary shares	200,000,000	200,000,000	200,000,000	200,000,000
Earnings per share (tenge),				
basic and diluted	65.51	46.63	162.30	124.77

The Group has no dilutive or potentially dilutive securities outstanding.

Additional information disclosed in accordance with "KASE" requirements

The cost of ordinary shares, calculated in accordance with the requirements of the "KASE"

According to the requirements of the "KASE", the Group has calculated its cost per ordinary share, which was calculated based on the number of ordinary shares outstanding at the reporting date. The cost per ordinary share as at 30 September 2022 and 31 December 2021 is presented below.

In millions of tenge	30 September 2022	31 December 2021
Net assets, excluding intangible assets Number of ordinary shares in issue	89,818 200,000,000	55,987 200,000,000
Cost of ordinary share, calculated in accordance with listing requirements of the "KASE" (tenge)	449.09	279.94

During the nine months ended 30 September 2022, the Group did not declare and did not pay dividends (30 September 2021: 17,578 million tenge).

6. PROPERTY AND EQUIPMENT

During the three and nine-month period ended 30 September 2022, additions to property and equipment totaled to 3,685 million tenge and 10,831 million tenge, respectively (during three and nine-month period ended 30 September 2021: 5,143 million tenge and 9,010 million tenge, respectively).

During the three and nine-month period ended 30 September 2022, transfer from construction-in-progress to property and equipment amounted to 3,942 million tenge and 7,940 million tenge, respectively (during three and nine-month period ended 30 September 2021: 1,872 million tenge and 5,720 million tenge, respectively.

During the three and nine-month period ended 30 September 2022, the Group recognised depreciation expense in the amount of 3,570 million tenge and 10,705 million tenge, respectively (during three and nine-month ended 30 September 2021: 3,903 million tenge and 11,619 million tenge, respectively).

During the three and nine-month period ended 30 September 2022, the Group recognised decrease in changes in estimates in assets retirement obligation in the amount of 183 million tenge and 457 million tenge, respectively (during three and nine-month period ended 30 September 2021: 28 million tenge and 92 million tenge, respectively).

During the three and nine-month period ended 30 September 2022, the Group sold property with gross book value in the amount of 18 million tenge with net book value in the amount of 7 million tenge (during three and nine-month ended 30 September 2021: gross book value in the amount of 641 million tenge, net book value 117 million tenge).

During nine-month period ended 30 September 2022, a building with carrying amount of 2,243 million tenge was transferred to investment property, because it was no longer used by the Group and it was decided that the building would be leased to third and related parties. As of 30 September 2022, fair value of investment property equaled to 6,573 million tenge.

6. PROPERTY AND EQUIPMENT (CONTINUED)

As at 30 September 2022, the gross carrying value of property and equipment which has been fully depreciated and still in use, was 179,097 million tenge (as at 31 December 2021: 173,272 million tenge).

During the nine-month period ended 30 September 2022, the Group has written off the fully amortized property and equipment with gross book value in the amount of 1,070 million tenge (during nine-month period ended 30 September 2021: nil tenge).

7. INTANGIBLE ASSETS

During the three and nine-month ended 30 September 2022, the Group acquired intangible assets in the amount of 2,682 million tenge and 7,401 million tenge, respectively (during three and nine-month ended 30 September 2021: 1,594 million tenge and 2,413 million tenge, respectively).

During the three and nine-month ended 30 September 2022, the Group recognized amortization expense in the amount of 3,288 million tenge and 8,773 million tenge, respectively (during three and nine months ended 30 September 2021: 2,657 million tenge and 7,968 million tenge, respectively).

As at 30 September 2022, the carrying amount of 3G license was 1,083 million tenge (31 December 2021: 1,333 million tenge) and its remaining amortization period was 4 years. As at 30 September 2022, the carrying amount of the 4G license was 14,444 million tenge (31 December 2021: 15,744 million tenge) and its remaining amortization period was 9 years.

As at 30 September 2022, the gross carrying value of intangible assets, which have been fully amortized and still in use, was 39,692 million tenge (31 December 2021: 42,175 million tenge).

During the nine months period ended 30 September 2022, the Group has written off the fully amortized intangible assets with gross book value in the amount of 2,983 million tenge (during nine months period ended 30 September 2022 nil tenge).

8. TRADE RECEIVABLES

As at 30 September 2022 and 31 December 2021, trade receivables comprised of the following:

	30 September	
	2022	31 December
In millions of tenge	(unaudited)	2021
Trade receivable from subscribers	35,288	23,262
Trade receivable from interconnect services	2,248	1,129
Trade receivables from roaming operators	357	173
Trade receivables from dealers and distributors	580	748
Trade receivables from related parties (Note 21)	4,515	3,238
Less: allowance for expected credit losses	(10,036)	(6,651)
	32,952	21,899
Less: long-term portion of trade receivable from subscribers	(6,887)	(4,148)
	26,065	17,751

During the nine months ended 30 September 2022 and 2021, movements in the allowance for expected credit losses were as follows:

In millions of tenge	30 September 2022 (unaudited)	30 September 2021 (unaudited)
Allowance for expected credit losses at the beginning of the period	(6,651)	(9,964)
Charge for the period	(3,385)	(943)
Write-off for the period	-	776
Sales of trade receivables	-	4,110
Allowance for expected credit losses at the end of the period	(10,036)	(6,021)

On 18 and 19 February 2021 the Group sold overdue receivables with gross value in the amount of 4,548 million tenge and net book value in the amount of 438 million tenge for 438 million tenge.

9. INVENTORY

As at 30 September 2022 and 31 December 2021, inventories comprised:

In millions of tenge	30 September 2022 (unaudited)	31 December 2021
Handsets and accessories (at lower of cost and net realizable value)	9.545	5,898
Start packages (at cost)	93	207
Marketing materials (at cost)	66	70
SIM-cards (at cost)	62	85
Other materials (at cost)	86	322
	9,852	6,582

For nine month-period ended 30 September 2022, the Group recognised as an expense 296 million tenge (nine month-period ended 30 September 2021: 179 million tenge) for inventories carried at net realisable value, which is recognised within general and administrative expenses. In addition, for nine month-period ended 30 September 2022 the Group wrote-off inventory in the amount of 553 million tenge due to consequences of protests held in Kazakhstan in January 2022 (*Note 23*).

10. OTHER CURRENT NON-FINANCIAL ASSETS

As at 30 September 2022 and 31 December 2021, other current non-financial assets comprised of the following:

	30 September 2022	31 December
In millions of tenge	(unaudited)	2021
Advances paid	3,088	3,120
VAT recoverable	2,570	3,578
Prepaid taxes other than income taxes	851	2,535
Prepaid expenses	443	878
	6,952	10,111

11. CASH AND CASH EQUIVALENTS

As at 30 September 2022 and 31 December 2021, cash and cash equivalents comprised of the following:

In millions of tenge	30 September 2022 (unaudited)	31 December 2021
Bank deposits with original maturity of less than 90 days	32,547	45,018
Cash on current bank accounts	18,824	6,380
Cash on hand	5	4
	51,376	51,402

As of 30 September 2022, short-term bank deposits represent overnight deposits in tenge in Altyn Bank JSC at interest rate 13.35% in the amount of 7,067 million tenge, Halyk Bank JSC at interest rate 13,35% in the amount of 1,400 million tenge, Citi Bank JSC at interest rate 6,5% in the amount of 24 million tenge, KazPost JSC at interest rate 13.2% in the amount of 5,000 million tenge, and First Heartland Jýsan Bank JSC at interest rate 13,55% in the amount of 16,010 million tenge. Deposits in USD at Halyk Bank JSC at interest rate 1,5% in the amount of 3,044 million tenge. As at 30 September 2022 and 31 December 2021, cash and cash equivalents were denominated in various currencies as follows:

	30 September 2022	31 December
In millions of tenge	(unaudited)	2021
US dollars	19,561	16,651
Tenge	31,494	34,133
Euro	281	526
Russian rubles	39	91
Other	1	1
	51,376	51,402

12. BORROWINGS

As at 30 September 2022 and 31 December 2021, borrowings comprised of the following:

In millions of tenge	Currency	Effective interest rate	Maturity date	30 September 2022 (unaudited)	31 December 2021
First Heartland Jusan Bank JSC (Note			10 November		
21)	Tenge	11.70%	2024	40,111	39,871
Bank of China Kazakhstan JSC	Tenge	10.70%	1June 2024	2,033	13,105
VTB Bank JSC	Tenge	11.90%	15 October 2023	5,314	7,006
				47,458	59,982
Less: non-current portion				(46,550)	(48,283)
				908	11,699

The Group's borrowings are denominated in Kazakhstani tenge and represented by unsecured loans. The borrowings have financial and non-financial covenants. Breaches in meeting the covenants would permit the banks to immediately call loans and borrowings. As at 30 September 2022, there have been no breaches of the covenants.

The Group has not entered into any hedging arrangements in respect of its interest rate exposures.

During 2019 and 2020, the Group obtained loan in the amount of 5,000 million and 6,000 million tenge, respectively, within credit line agreement with Bank of China Kazakhstan JSC with a repayment period of 36 months and a fixed interest rate of 10.5% per annum. On 14 October 2020 the Group has signed addendum to loan agreement with Bank of China JSC to decrease interest rate from 10.5% to 10.3% per annum under credit line agreement. The change in the interest rate does not represent a substantial modification in accordance with IFRS 9 and thus, it did not lead to the derecognition of the original liability. Consequently, in 2020 the Group recognized finance income in the amount of 33 million tenge as a result of change in the interest rate. The loan is secured by the financial guarantee provided by Kazakhtelecom JSC, the parent company. The Group considers the financial guarantee provided by the parent to be an integral part of the loan, and therefore does not recognize the guarantee received separately in its consolidated financial statements.

On 2 June 2021 the Group obtained additional tranche in the amount of 2,000 million tenge from Bank of China JSC within the same credit line agreement with maturity on 1 June 2024. On 22 August 2022, the Group partially repaid principal in the amount of 11,000 million tenge.

On 28 October 2020 the Group obtained loan in the amount of 6,000 million tenge within the credit line agreement with VTB Bank JSC with maturity till October 2023 at interest rate 10.7% per annum. On 31 March 2021 the Group signed an additional agreement with VTB Bank JSC to increase the amount of the credit line from 6,000 million tenge to 7,000 million tenge, and obtained 1,000 million tenge with a maturity until 15 October 2023 and an interest rate of 10.7% per annum. On 1 March 2022, the Group partially repaid principal in the amount of 2,000 million tenge.

On 10 November 2021, the Group and First Heartland Jusan Bank JSC, one of the shareholders of the Company, signed a credit line agreement in the amount of 60,500 million tenge. On 11 November 2021 two tranches were received from First Heartland Jusan Bank JSC in the amount of 22,000 million tenge and 12,000 million tenge with an interest rate of 11% per annum and 10.7% per annum, respectively. Additionally, on 25 November 2021, third tranche was received from First Heartland Jusan Bank JSC in the amount of 6,500 million tenge with an interest rate of 11% per annum, with a maturity until 10 November 2024. At the date of initial recognition, the loan was recognized at fair value based on expected cash outflows at a market rate observable for similar instruments of 12.9% at the time the loan was issued. On initial recognition of all three tranches total discount in the amount of 1,260 million tenge was recognised within equity as the additional paid-in capital.

13. RIGHT-OF-USE ASSETS AND LEASE LIABILITIES

The Group's right of use assets are represented by buildings and constructions. Set out below are the carrying amounts of right-of-use assets recognised and the movements during the period:

In millions of tenge		Total
Cost		
At 1 January 2021 (audited)		29,485
Modification		814
Cancellation		(138)
At 30 September 2021 (unaudited)		30,161
At 1 January 2022 (audited)		30,238
Modification		2,485
At 30 September 2022 (unaudited)		32,723
Accumulated depreciation		
At 1 January 2021 (audited)		(8,681)
Depreciation charge		(3,458)
Cancellation		45
At 30 September 2021 (unaudited)		(12,094)
At 1 January 2022 (audited)		(13,295)
Depreciation charge		(3,486)
At 30 September 2022 (unaudited)		(16,781)
Net book value		
At 31 December 2021 (audited)		16,943
At 30 September 2022 (unaudited)	.	15,942
et out below are the carrying amounts of lease liabilities and	d the movements during the period:	
	30 September	30 September
	2022	2021
In millions of tenge	(unaudited)	(unaudited)
At the beginning of the period	20,129	23,666

In millions of tenge	30 September 2022 (unaudited)	30 September 2021 (unaudited)
At the beginning of the period	20,129	23,666
Interest expenses	2,149	2,100
Payments	(5,699)	(5,281)
Modifications	2,485	814
Cancellation	_	(107)
At the end of the period	19,064	21,192
Long-term lease liabilities	14,507	16,397
Short-term lease liabilities	4,557	4,795

13. RIGHT-OF-USE ASSETS AND LEASE LIABILITIES (continued)

The following amounts are recognised in profit or loss:

	For three months ended 30 September		For nine months ended 30 September	
	2022	2021	2022	2021
In millions of tenge	(unaudited)	(unaudited)	(unaudited)	(unaudited)
Depreciation expense of right-of-use assets	1,069	1,167	3,486	3,458
Interest expense on lease liabilities	858	680	2,149	2,100
	1,927	1,847	5,635	5,558

14. TRADE PAYABLES

As at 30 September 2022 and 31 December 2021, trade payables comprised of the following:

	30 September 2022	31 December
In millions of tenge	(unaudited)	2021
Trade payables to third parties	11,417	32,603
Trade payables to related parties (Note 21)	3,424	3,102
	14,841	35,705

As at 30 September 2022 and 31 December 2021, the Group's trade payables were denominated in the following currencies:

In millions of tenge	30 September 2022 (unaudited)	31 December 2021
Tenge	13,292	33,119
US dollars	1,166	1,460
Other currency	383	1,126
	14,841	35,705

15. FINANCIAL GUARANTEE OBLIGATION

On 27 November 2020 the Group issued the financial guarantee on loan agreement of Kazakhtelecom JSC obtained from Development Bank of Kazakhstan JSC in the amount of 18,266 million tenge. The financial guarantee has maturity till 19 December 2024. The Group initially recognised the financial guarantee at fair value in the amount of 592 million tenge through retained earnings in equity. As at 30 September 2022 and 31 December 2021, the Group measured financial guarantee obligation at the higher of the amount of the loss allowance determined in accordance with IFRS 9 *Financial Instruments* and the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with IFRS 15 *Revenue from Contracts with Customers*. As of 30 September 2022, financial guarantee obligation equaled to 193 million tenge, which represents the initial amount less the cumulative amount of income recognised in accordance with IFRS 15 (31 December 2021: 330 million tenge).

30 September

2,237

8,771

NOTES TO THE INTERIM CONDENSED CONSOLIDATED FINANCIAL STATEMENTS (continued)

16. PROVISIONS

Government grants current portion

Government grants non-current portion

In 2020 the Group accrued provision related to legal claims on contractual obligation and fines and penalties that Management considers as probable in the amount of 3,685 million tenge.

	2022	31 December
In millions of tenge	(unaudited)	2021
Legal claims on contractual obligation	3,685	3,685
Asset retirement obligation: current portion		132
	3,685	3,817
17. GOVERNMENT GRANTS		
	30 September	30 September
In millions of tenge	2022 (unaudited)	2021 (unaudited)
Government grants as at 1 January	7,925	_
Received during the period	4,851	_
Released to profit or loss	(1,768)	-
Government grants as at 30 September	11,008	_

In 2021 the Government approved the changes to the Rules for the assignment of frequency bands, radio frequencies, operation of radio-electronic means and high-frequency devices ("the Rules"), based on which the Group is eligible for government grants in form of 90% reduction in the annual fee for use of radio frequencies from 1 January 2020 till 1 January 2025. The government grants are subject to conditions, namely financing of the projects related to broadband internet in rural and urban areas. If the financing of the projects related to broadband internet is lower than the amount of the tax incentive received, the Group should pay the annual fee equal for use of radio frequencies to the amount of unfulfilled obligations to the authorities.

The funds released as a result of reduction in the annual fee for use of radio frequencies for 2020 and 2021 in the amount of 4,725 million tenge and 5,308 million tenge, respectively, were used by the Group for the purchase and construction of broadband internet. Government grants related to assets are recognized as deferred income that is recognised in profit or loss on a systematic basis over the useful life of the asset. As of 30 September 2022 the balance of deferred income recognized was equal to 11,008 million tenge (As of 31 December 2021: 7,925 million tenge), and part of the government grants released to the profit and loss over the period necessary to match the related depreciation charges equal to 1,768 million tenge.

As of 30 September 2022 there are no unfulfilled conditions or contingencies attached to these grants.

18. REVENUE FROM CONTRACTS WITH CUSTOMERS

		ree months September	For the nine months ended 30 September		
	2022	2021	2022	2021	
In millions of tenge	(unaudited)	(unaudited)	(unaudited)	(unaudited)	
Mobile and other services	44,000	37,812	123,608	107,615	
Sale of handsets and equipment	11,909	9,827	35,838	25,867	
Value added services	1,749	2,606	4,846	6,926	
Other	46	-	136	-	
	57,704	50,245	164,428	140,408	
Over time	45,749	40,418	128,454	114,541	
At a point of time	11,955	9,827	35,974	25,867	
	57,704	50,245	164,428	140,408	

As at 30 September 2022 and 31 December 2021, the contract liabilities in the amount of 4,061 million tenge and 3,207 million tenge, respectively, were represented by deferred revenue.

19. COST OF SALES

	For the three mo	nths ended 30			
	September		For the nine months ended 30 Septem		
	2022	2021	2022	2021	
In millions of tenge	(unaudited)	(unaudited)	(unaudited)	(unaudited)	
Cost of SIM-card and handsets	10,250	8,489	30,030	22,222	
Depreciation and amortization	6,801	6,546	19,679	19,532	
Interconnect fees and expenses	4,675	4,772	14,331	13,823	
Personnel costs	3,229	3,187	9,836	8,473	
Transmission services	2,757	2,470	8,020	7,710	
Repair and maintenance	2,173	2,119	6,321	5,575	
Fees for use of frequency range	1,881	1,662	5,615	5,198	
Electricity	967	1,033	3,303	2,898	
Network sharing agreement	1,077	890	2,803	2,226	
Mobile service tax	643	574	1,809	1,611	
Security and safety	44	88	198	259	
Materials	83	53	124	133	
Other	510	798	1,539	2,200	
	35,090	32,681	103,608	91,860	

20. INCOME TAX EXPENSES

	For the three months ended 30 September		For the nine months ended 30 September		
	2022	2021	2022	2021	
In millions of tenge	(unaudited)	(unaudited)	(unaudited)	(unaudited)	
Current income tax expense	4,003	2,649	11,236	7,297	
Deferred income tax expense	(835)	(662)	(450)	(741)	
	3,168	1,987	10,786	6,556	

21. RELATED PARTY DISCLOSURES

Parties are generally considered to be related if one party has the ability to control the other party, is under common control, or can exercise significant influence or joint control over the other party in making financial and operational decisions. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

The Group's primary transactions with related parties are consulting services, technical assistance and operational support, transmission rent, roaming and interconnect.

As at 30 September 2022, the Group recognized an allowance for expected credit losses in the amount of 147 million tenge in respect of receivables from related parties (31 December 2021: 143 million tenge).

Parent is controlled by the Government of the Republic of Kazakhstan through Sovereign Wealth Fund "Samruk-Kazyna" JSC ("Samruk-Kazyna") which owns 51% of Kazakhtelecom's controlling shares (*Note 1*). Governmental entities include entities under common control and associates of the Government of the Republic of Kazakhstan.

Related party transactions were made on terms agreed between parties that may not necessarily be at market rate. Sales and purchases with related parties for three and nine months ended 30 September 2022 and 2021, and the balances with related parties as at 30 September 2022 and 31 December 2021, were as follows:

For the three month	s ended 30			
Septembe	er	For the nine months ended 30 September		
	2021			
2022	(unaudited	2022	2021	
(unaudited))	(unaudited)	(unaudited)	
54	63	153	164	
3,395	3,455	10,509	10,347	
59	72	161	202	
3,508	3,590	10,823	10,713	
100	400		200	
128	103	378	338	
6,355	6,695	18,866	19,206	
35	14	91	61	
6,518	6,812	19,335	19,605	
1,223	_	3,602	_	
	2022 (unaudited) 54 3,395 59 3,508 128 6,355 35 6,518	2022 (unaudited (unaudited)) 54 63 3,395 3,455 59 72 3,508 3,590 128 103 6,355 6,695 35 14 6,518 6,812	September For the nine months end 2021 2022 (unaudited (unaudited)) 2022 (unaudited) 54 63 153 3,395 3,455 10,509 59 72 161 3,508 3,590 10,823 128 103 378 6,355 6,695 18,866 35 14 91 6,518 6,812 19,335	

21. RELATED PARTY DISCLOSURES (continued)

	30 September 2022	31 December
In millions of tenge	(unaudited)	2021
Trade receivables (Note 8)		
Entities of Samruk Kazyna group	102	36
Entities of Kazakhtelecom group	4,322	3,155
Government entities	91	47
	4,515	3,238
Trade payable (Note 14)		
Entities of Samruk Kazyna group	31	14
Entities of Kazakhtelecom group	3,390	3,050
Government entities	3	38
	3,424	3,102
Borrowings (Note 12)		
Other Shareholders	40,111	39,871
Cash and deposit accounts		
Other Shareholders	20,173	11,010

Compensation to key management personnel

For the three and nine-month period ended 30 September 2022, the total compensation to key management personnel included in the accompanying interim condensed consolidated statement of comprehensive income under general and administrative expenses was 343 million tenge and 1,259 million tenge, respectively. Compensation to key management personnel consists of wages fixed in the employment agreement, as well as remuneration based on the performance for the year.

22. FINANCIAL INSTRUMENTS

Fair values

The fair value of non-current financial assets is estimated using discounted cash flow based on deposit rates currently available to the Group with similar terms and average maturities. The fair value of non-current financial liabilities is estimated using discounted cash flow based on credit rates currently available to the Group with similar terms and average maturities.

The tables below present fair value hierarchy of assets and liabilities of the Group. Disclosure of quantitative information of fair value hierarchy of financial instruments as at 30 September 2022 and 31 December 2021 was as follow:

		Price quotation on active market	Significant observable in-puts	Significant unobservable	
In millions of tenge	Date of valuation	(Level 1)	(Level 2)	in-puts (Level 3)	Total
Assets for which fair values are disclosed					
Short-term trade receivables	30 September 2022	-	-	26,065	26,065
Long-term trade receivables	30 September 2022	-	-	6,887	6,887
Other current financial assets	30 September 2022	-	-	774	774
Liabilities for which fair values are disclosed					
Borrowings	30 September 2022	_	-	44,350	44,350
Trade payables	30 September 2022	_	_	14,841	14,841
Financial guarantee obligation	30 September 2022	_	_	194	194
Due to employees	30 September 2022			5,616	5,616
		Price			
		quotation	Significant	Significant	
		on active	observable	unobservable	
In millions of tongs	Date of valuation	market (Level 1)	in-puts (Level 2)	in-puts (Level 3)	Total
In millions of tenge	Date of Valuation	(Level I)	(Level 2)	(Level 3)	TOlai
Assets for which fair values are disclosed					
Short-term trade receivables	31 December 2021	-	-	17,751	17,751
Long-term trade receivables	31 December 2021	-	_	3,758	3,758
Other current financial assets	31 December 2021	-	-	538	538
Liabilities for which fair values are disclosed					
Borrowings	31 December 2021	_	_	56,289	56,289
Trade payables	31 December 2021	_	_	35,705	35,705
Financial guarantee obligation	31 December 2021	_	-	564	564
Due to employees	31 December 2021	_	_	4,347	4,347

22. FINANCIAL INSTRUMENTS (CONTINUED)

Fair values (continued)

As at 30 September 2022 and 31 December 2021, the carrying amounts of the Group's financial assets and liabilities presented as follow:

In millions of tenge	Carrying amount 30 September 2022	Fair value 30 September 2022	Unrecog- nised gain/ (loss)	Carrying amount 31 December 2021	Fair value 31 December 2021	Unrecog- nised gain/ (loss)
Financial assets						
Cash and cash equivalents	51,376	51,376	-	51,402	51,402	-
Short-term trade receivables	26,065	26,065	-	17,751	17,751	-
Long-term trade receivables	6,887	6,887	-	4,148	3,758	(390)
Other current financial assets	774	774	-	538	538	` _
Financial liabilities						
Borrowings	47,458	44,350	3,108	59,982	56,289	3,693
Trade payables	14,841	14,841	_	35,705	35,705	_
Due to employees	5,616	5,616	-	4,347	4,347	-
Total unrecognised change in unrealised fair value			3,108			3,303

23. COMMITMENTS AND CONTINGENT LIABILITIES

Operating environment

Kazakhstan continues economic reforms and development of its legal, tax and regulatory frameworks as required by a market economy. The future stability of the Kazakhstan economy will largely depend on these reforms, as well as on the effectiveness of the Government's actions in the area of economy, financial and monetary policy.

Protests in Kazakhstan

On 2 January 2022 protests started in Mangystau region of Kazakhstan related to significant increase in the liquified natural gas retail price. These protests spread to other cities and resulted in riots, damage to property and loss of life. On 5 January 2022 the government declared a state of emergency.

During the protests, six Kcell Stores located in Almaty and Almaty region, were looted and two large offices of the Group were attacked.

The Management of the Group formed operational headquarters due to state emergency announcement for timely decision making on operational issues for uninterrupted communication of subscribers and facilitate the Government with urgent actions.

Providing subscribers with continuous cellular communications was a priority of the Group and the Management decided to support its subscribers including small and medium sized businesses during the state of emergency. During the state of emergency declared throughout Kazakhstan, and until the end of January 2022, corporate clients of Kcell with a lack of balance on their account were not limited to communication and access to the Internet.

As a result of the above protests and state of emergency the President of Kazakhstan has made certain public announcements regarding possible measures including amendments to the tax legislation, introducing measures for financial stability, controlling and stabilizing the inflation rate and the tenge exchange rate.

On 10 January 2022 the National Security Committee of Kazakhstan reported that the situation in the country has stabilized and was under control. On 19 January 2022 the state emergency was lifted.

23. COMMITMENTS AND CONTINGENT LIABILITIES (continued)

Operating environment (continued)

Protests in Kazakhstan (continued)

The Group incurred losses from those events in amount of 553 million tenge that represents robbery of inventories (goods for resale) and damage of stores, which was recognized within other operating expenses in interim condensed consolidated statement of comprehensive income for nine months ended 30 September 2022.

Events in Ukraine and Coronavirus pandemic

The events in Ukraine has had a significant negative impact on the global economic outlook. In response to the offensive, extensive sanctions have been imposed on Russia that largely exclude the country from the international financial markets and significantly curtail trade in goods. These sanctions are intended to have a negative economic impact on the Russian Federation. Sanctions were imposed on certain Russian banks, including JSC "Alfa Bank" and PJSC "Sberbank", in whose subsidiary located in Kazakhstan the Group held cash as at 31 December 2021 in the total amount of 39 million tenge. The Group timely transferred funds to other banks. The Group's business activities and hence its results of operations and financial position are not significantly impacted by the consequences of the war in Ukraine, as the Group does not operate any networks in Russia or Ukraine.

Due to geopolitical events around Ukraine and Russia, on 24 February 2022, oil prices exceeded \$100 per barrel. However, after some stabilization in global economy level, on 25 September 2022, oil prices decreased to \$90 per barrel. On 28 March 2022, the exchange rate of tenge against the US dollar began to strengthen gradually and stabilized to approximately 470 KZT per 1 USD. On 26 October 2022, the National Bank of the Republic of Kazakhstan decided to raise the base rate by 2.50 percentage points to 16.0% while maintaining the +/-1% band.

Possible future effects on the measurement of individual assets and liabilities due to war in Ukraine and coronavirus pandemic are being analyzed on an ongoing basis. It is not yet possible to assess with certainty how the Group will be indirectly affected, in particular by the impact on the global economy. The overall economic outlook has deteriorated significantly as a result of the extensive sanctions and limitations on trade in goods. Based on experience so far, the Group expects the events in Ukraine and coronavirus pandemic to only impact business to a limited extent going forward.

Capital commitments

The Group generally enters into contracts for the completion of construction projects and purchase of equipment. As at 30 September 2022, the Group had contractual commitments totaling 26,439 million tenge, excluding VAT (unaudited) (as at 31 December 2021: 21,016 million tenge, excluding VAT), which includes capital expenditures in respect to new technical regulation in the amount of 7,645 million tenge (as of 31 December 2021: 3,490 million tenge) described below.

Taxation

Tax legislation and regulatory framework of the Republic of Kazakhstan are subject to constant changes and allow for different interpretations. Instances of inconsistent opinions between local, regional and national tax authorities are not unusual. The current regime of penalties and interest related to reported and discovered violations of Kazakhstan's tax laws are severe. Penalties are generally 80% of the taxes additionally assessed and interest is assessed at the refinancing rate established by the National Bank of the Republic of Kazakhstan multiplied by 1.25. As a result, penalties and interest can amount to multiples of any assessed taxes. Fiscal periods remain open to review by the authorities in respect of taxes for five calendar years preceding the year of review.

Management believes that as at 30 September 2022 its interpretation of the relevant legislation is appropriate and that it is probable that the Group's tax positions will be sustained, except as provided for or otherwise disclosed in these interim condensed consolidated financial statements.

23. COMMITMENTS AND CONTINGENT LIABILITIES (continued)

Government grant related to frequency fee

The Group has submitted consolidated report on expenditures used to finance broadband projects access to the Internet in urban and rural areas included capital and operational costs that are necessary for the provision of broadband Internet access services in urban and rural settlements throughout the territory of the Republic of Kazakhstan. Management believes that there are no unfulfilled conditions or contingencies attached to these grants.

In case if, based on the results of the audited information, the fact of non-fulfillment by the telecom operator of obligations to allocate at least released funds from the reduction of the corresponding fee rate to finance broadband Internet access projects in urban and rural areas is confirmed, the authorized body in the field of communications not earlier than one year after of the year following the reporting year, recalculates the amount of the annual fee for the use of frequency fee for the reporting year, which should be proportional to the unfulfilled volume of financial obligations for this reporting year.

New technical regulations

Order No. 91 of the Committee of the National Security dated 20 December 2016 on approval of the *Technical Regulations General Requirements to the Telecommunication Equipment in Ensuring Conducting of Operative Search Measures, Collection and Storage of Subscribers' Information* was published on 7 February 2017 and came into force on 8 February 2018. According to the new regulations, there are additional requirements to the telecommunication equipment that include expansion of technical capabilities of equipment to conduct operative search activities, collection and storage of subscribers' information (hereinafter – "ORA").

As of 30 September 2022 the Group partially implemented modernization and expansion of license and port capacity for the total amount of 4,390 million tenge. The Group plans to complete expansion in full in 2022 and expect that total amount of capital expenditures in respect to modernization and expansion will be equaled to 7,645 million tenge.

24. SUBSEQUENT EVENTS

The Group did not have any significant subsequent events after reporting date.