

REGULATION ON ELECTRONIC DOCUMENT FLOW AND THE USE OF AN ELECTRONIC DIGITAL SIGNATURE AT DOS-CREDOBANK OJSC

I. GENERAL PROVISIONS

1. This Regulation “On Electronic Document Flow and the Use of an Electronic Digital Signature at Dos-CredoBank OJSC” (hereinafter referred to as the Regulation) shall regulate the procedure for organizing, maintaining, and controlling electronic document flow and the use of an electronic digital signature at Dos-CredoBank OJSC (hereinafter referred to as the Bank).
2. Electronic documents signed with an electronic digital signature (simple or certified electronic signature) shall have legal force equivalent to paper documents in accordance with the laws of the Kyrgyz Republic.
3. The Regulation shall aim to ensure the security, efficiency, and transparency of the electronic document management processes within the Bank, as well as in interactions with customers, authorized state bodies of the Kyrgyz Republic, and the Bank’s partners/counterparties.
4. Electronic document flow may be used in any activity of the Bank, including but not limited to interactions with state authorities, the NBKR, the Bank’s partners and counterparties, customers (including in documents/information that were submitted by customers to the Bank or created by the Bank, or arose in any other way in connection with the Bank’s relationship with customers, including their pre-contractual relations, in the course of banking activities).
5. Within the framework of this Regulation, the following terms and definitions are used:
 - **Electronic document flow (EDF)** – the process of creating, signing, transmitting, storing, and processing electronic documents.
 - **Electronic document** – documented information presented in electronic form, that is, in a form suitable for perception by a person, using electronic computing machines.
 - **Electronic digital signature (EDS)** – information in electronic form that is attached to or logically linked with other information in electronic form and is used to identify the person on whose behalf the information is signed.
 - **Electronic document flow system (EDF system)** - a hardware and software package used by the Bank for managing electronic documents.

II. BASIC PRINCIPLES OF ELECTRONIC DOCUMENT FLOW AND THE USE OF AN ELECTRONIC DIGITAL SIGNATURE

6. In order to successfully implement electronic document flow (EDF) and electronic digital signature (EDS), which are important tools for the Bank’s digital transformation, ensuring

the efficiency, security, and legal significance of documents, the following principles must be observed:

6.1. *Electronic Document Flow Principles:*

6.1.1. Legality and compliance with the regulatory requirements of the laws of the Kyrgyz Republic.

- Electronic documents must be created, transmitted, stored, and destroyed in accordance with the laws of the Kyrgyz Republic.
- Technologies used in EDF must comply with the requirements of security, confidentiality, and relevance standards.

6.1.2. Legal significance and authenticity.

- Electronic documents must contain all mandatory details confirming their authenticity.
- The use of EDS on electronic documents shall ensure their immutability and the authorship of the EDS owner.

6.1.3. Security and Data Protection.

- Electronic documents must be protected from unauthorized access, alteration, and destruction.
- When creating and using electronic documents, it is recommended to use certified information protection and encryption tools.

6.1.4. Efficiency and Promptness.

- The automation of document flow shall reduce the time for document approval and increase the productivity and efficiency of staff.
- Duplication of information and manual processing of documents shall be excluded, which reduces the risk of errors.

6.1.5. Transparency and Control.

- All operations with electronic documents shall be recorded in EDF systems, ensuring their preservation and controllability.
- Mechanisms for access control and user rights delimitation shall be implemented.

6.1.6. Long-Term Storage and Archiving

- Electronic documents must be stored in accordance with the established storage periods according to the requirements of the laws of the Kyrgyz Republic¹.
- Protection of archives from loss, damage, and unauthorized alteration shall be ensured.

6.2. *Principles of Using an Electronic Digital Signature:*

6.2.1. Reliability and Unique Character.

- Participants in electronic interaction shall have the right to choose any type of electronic signature at their discretion, unless the requirement to use a specific type of electronic signature according to its intended use is provided for by legislative acts, regulatory legal acts of the Kyrgyz Republic (in cases where such possibility

¹ “List of the main documents generated in the course of activities of commercial banks and financial and credit institutions licensed by the National Bank of the Kyrgyz Republic with the indication of storage periods” No. 22/9 dated August 27, 2004

is provided by legislative acts) or by agreement of the participants in electronic interaction;

- Participants in electronic interaction can use at their discretion any technology and/or technical means that shall allow them to meet the requirements of the Law of the Kyrgyz Republic “On Electronic Signature” applicable to the use of specific types of electronic signatures;
- EDS keys shall be stored in secure environments and shall not be transferred to third parties;
- It shall be unacceptable to recognize an electronic signature and/or the electronically signed document as having no legal force solely on the grounds that the signature in the electronic document is not a handwritten signature;

6.2.2. Distinction of Signature Levels.

The Bank may use one or all types of EDS:

- a) **Simple electronic signature** – an electronic signature whose signing key matches the electronic signature itself (codes, passwords, and other identifiers) and shall be used for both internal documents of the Bank and documents of customers in any available and permitted form of user authentication.
- b) **Non-certified EDS** – an electronic signature used for documents that shall not require maximum protection and meet the following characteristics:
 - ✓ Obtained as a result of the cryptographic transformation of information using a signing key;
 - ✓ Allows for the unambiguous identification of the person who signed the electronic document;
 - ✓ Allows for the detection of any changes made to the electronic document after it has been signed;
 - ✓ Created using electronic signature means that the person signing the electronic document can control securely.
- c) **Certified electronic signature (CES)** – an electronic signature that shall meet all the characteristics of a non-certified electronic signature and the following additional characteristics:
 - ✓ The signature verification key shall be specified in the qualification certificate;
 - ✓ Electronic signing means that have been confirmed to meet the requirements established by the laws of the Kyrgyz Republic shall be used to create and verify the electronic signature.

CES shall be used for signing legally significant documents, contracts, financial and other reports submitted to authorized state bodies and the National Bank of the Kyrgyz Republic.

6.2.3. Control and Audit of Use.

- a) The Bank shall appoint officials responsible for the issuance, use, accounting, and control over EDS use.
- b) Regular checks for unauthorized use of EDS shall be conducted.

6.2.4. Compatibility, Protection and Integration.

- a) EDS must be supported by the EDF systems used and interact with external services.

- b) Compliance with electronic signature standards for interaction with the Bank's partners/counterparties and government bodies of the Kyrgyz Republic shall be ensured.
 - c) In case of EDS compromise, it must be promptly revoked and replaced.
- 6.3. Compliance with these principles shall allow for the effective use of the EDF and EDS systems, ensuring the reliability, security, and legal significance of electronic documents in the Bank.

III. PROCEDURE FOR USE AND AREAS OF APPLICATION OF ELECTRONIC DOCUMENT FLOW

7. The Bank shall use an EDF system that ensures the following:
- Creation, use, and storage of electronic documents;
 - Routing and approval of electronic documents;
 - Use of EDS;
 - Interaction with the Bank's counterparties/customers/partners through EDF systems that comply with the legislative requirements of the Kyrgyz Republic.
8. Documents subject to processing in the EDF shall include the following:
- Contracts (including loan, pledge, and others), agreements, invoices, waybills;
 - Personnel documents (with the corresponding consent of employees);
 - Internal orders, directives, and office memos;
 - Other documents that may be drawn up in electronic form in accordance with the laws of the Kyrgyz Republic.
9. Access to the EDF shall be granted to authorized employees/counterparties/partners/customers of the Bank and, if necessary, to authorized state bodies in accordance with the requirements of the laws of the Kyrgyz Republic.
10. All participants in the EDF shall be required to comply with information protection requirements and shall not disclose login credentials for accessing the EDF system.
11. All matters related to the use of EDF and the signing of documents using EDS shall be governed by internal regulatory documents defining the procedures for the functioning of EDF in the Bank.

IV. PROCEDURE FOR THE USE OF AN ELECTRONIC DIGITAL SIGNATURE

12. The acquisition and use of an EDS shall be carried out in accordance with the laws of the Kyrgyz Republic.
13. Responsibility for the issuance and control over using an EDS in the Bank shall be assigned to the following structural divisions (including but not limited to):
- Information Security Department (establishing security standards or rules, overall monitoring of security controls, security audits, risk assessment);
 - IT Department (technical support, technical monitoring);
 - Legal Department (control of compliance with the requirements of the laws of the Kyrgyz Republic);

- Authorized employees and managers of structural divisions.
14. The owner of the EDS shall be responsible for the security of the private key and shall not be entitled to transfer it to third parties.

V. SECURITY AND DATA PROTECTION

15. The Bank shall ensure information protection in the EDF by:
- Using comprehensive protection measures (based on security risk assessments);
 - Regular updating software;
 - Encrypting and backing up data.
16. In the event of a compromise of the EDS, the employee shall be obliged to report this immediately to the responsible officer.
17. Overall control over compliance with security standards and rules when using the EDS shall be carried out by the Information Security Department.

VI. RESPONSIBILITY AND CONTROL

18. Personal responsibility for compliance with the Regulation shall rest with all employees using the EDF and EDS.
19. Disciplinary measures provided by the laws of the Kyrgyz Republic and the internal regulatory documents of the Bank may be applied for violating the order of using the EDS.
20. Regular checks for compliance with the requirements of the Regulation shall be carried out by:
- 1st line of defense: Heads of structural and independent divisions of the Bank, IT Department;
 - 2nd line of defense: Information Security Department;
 - 3rd line of defense: Internal Audit Service of the Bank.

VII. CONCLUDING PROVISIONS

21. This Regulation shall come into force from the moment of approval by the Bank's Management Board and shall be mandatorily observed by all structural divisions of the Bank, officials of the Bank who are participants in the described process.
22. Responsibility for the organization of timely familiarization, study, application, and use of this Regulation by employees shall rest with the heads of structural divisions of the Bank.
23. The Regulation shall be subject to review upon the identification of new vulnerabilities and risks, audit remarks, following security incidents, and as necessary. All changes and additions to this Regulation shall be approved by the Management Board after coordination with the Information Security Department.
24. In case of a conflict between this Regulation and regulatory legal acts, the subjects of legal relations shall be governed by the regulatory legal act possessing higher legal force.
25. Those issues not regulated by this Regulation shall be governed by the current laws of the Kyrgyz Republic and the regulatory legal acts of the National Bank of the Kyrgyz Republic, decisions of the Bank's Board of Directors, and other internal documents of the Bank.