



FREEDOM HOLDING CORP.

ANNUAL MEETING OF STOCKHOLDERS

September 14, 2021

RULES OF CONDUCT AND PROCEDURES

Welcome to the Annual Meeting of Stockholders (the “Annual Meeting”) of Freedom Holding Corp. (the “Company”). It is our desire to conduct a fair and informative Annual Meeting. Kindly observe the following Rules of Conduct and Procedures.

1. Our Company’s bylaws describe requirements for meetings of our stockholders and which allow for the Chair of such annual meetings to prescribe rules, rights, regulations, or procedures consistent with those requirements.
2. Because this is a meeting of our stockholders, only our stockholders are permitted to make comments or ask questions during the Annual Meeting. You need to have held stock as of the close of business on the record date of July 22, 2021 to vote or comment while participating in the virtual Annual Meeting. To vote or submit questions, please login as a Stockholder by entering the 16-digit control number you received with your proxy materials. If you have voted your shares prior to the start of the Annual Meeting, your vote has been received by the Company’s inspector of elections and there is no need to vote those shares during the Annual Meeting, unless you wish to revoke or change your vote.
3. We will strictly follow the Agenda as we conduct the meeting.
4. If a stockholder has a question about one of the matters in the Agenda to be voted on by the stockholders at the Annual Meeting, such question may be submitted in the field provided in the web portal at or before the time the matters are before the Annual Meeting for consideration.
5. To allow us to address comments from as many stockholders as possible, we will limit each person to one comment. It will help us if comments are succinct and cover only one topic. Comments from multiple stockholders on the same topic or that are otherwise related may be grouped, summarized and responded to together.

6. While comments are welcome, conducting the business set out in the Agenda for the benefit of all stockholders will be paramount. The Company does not intend to address any comments that are, among other things:
 - irrelevant to the business of the Company or to the business of the Annual Meeting;
 - related to material non-public information of the Company;
 - related to personal grievances;
 - derogatory references to individuals or that are otherwise in bad taste;
 - repetitious statements already made;
 - in furtherance of personal or business interests; or
 - out of order or not otherwise suitable for the conduct of the Annual Meeting as determined by the Company in their reasonable judgment.
7. If there are any matters of individual concern to a stockholder and not of general concern to all stockholders, or if a comment posed was not otherwise responded to, such matters may be raised separately after the Annual Meeting by contacting Investor Relations at +1(888) 996 3742 or by email at ir@freedomholdingcorp.com.
8. Recording of the Annual Meeting is prohibited. The Company may, in its sole discretion, post a webcast playback 24 hours after the completion of the meeting on the IR portion of the Company's website.

Thank you for your cooperation and for joining the Company at the Annual Meeting.