



Human Rights Due Diligence Report

Human Rights Due Diligence Process

01



Human Rights Policy

- the Bank's commitment at all stages of its operations



Risk and Impact Assessment

starting from 2025



Monitoring and Communications

Monitoring compliance with human rights
Communication channels for the stakeholders



Integration and Management

Mitigation measures

JSC Bank CenterCredit (the Bank) is one of the largest banks in the Republic of Kazakhstan providing a full range of high-tech financial services across all regions of Kazakhstan.

The Bank strives to act in the best long-term interests of the population and the state, make a positive contribution to improving the people's quality of life, to the country's socio-economic development and environmental sustainability.

In June 2025, the Bank conducted its first Human Rights Due Diligence self-assessment and decided to carry it out on an annual basis.

The steps in the Human Rights Due Diligence process include: identifying stakeholders; analyzing policy and corporate governance commitments; assessing compliance with human rights and applicable due diligence procedures; analyzing the availability and effectiveness of legal remedies; and developing action plans based on the assessment results.



Human Rights Compliance Commitments

The Bank's Board of Directors has approved the **Human Rights Policy** that sets out the Bank's principles and commitments to respect human rights at all stages of its operations. The Policy was updated in 2024 subject to recommendations of the United Nations Development Programme (UNDP).

The Bank has defined the following key commitments to respecting and protecting human rights, which it strives to uphold at all stages of its operations:

- respect for human dignity and human rights;
- zero tolerance for any form of discrimination;
- respect for employees' rights to freedom of assembly associations, freedom of opinion and expression;
- zero tolerance for child and forced labor;
- provision of decent working conditions and fair compensation;
- safe and healthy occupational environment;
- zero tolerance to any form of violence;
- respect for the rights, cultural characteristics and customs of local communities in the regions of operations;
- prevention of human trafficking;
- rights to collective bargaining;
- equal remuneration.



Политика по правам человека
АО «Банк ЦентрКредит»

Protection of Customer Rights and Interests

In 2025, the Bank has approved the **Customer Rights and Interests Protection Policy**. This document systematizes the Bank's approaches, objectives and principles in ensuring protection of the Bank customers' rights and interests:

The Bank builds its relationship with customers based on the following principles:

- avoiding any activities that could harm the business reputation or other intangible and tangible interests of customers;
- prevention of any form of customer discrimination;
- maintaining the confidentiality of all information, including customers' personal data;
- prohibition of unjustified refusal to provide the Bank's products and services to a customer;
- timely response to customer comments, complaints, and claims addressed to the Bank, and taking measures to eliminate the consequences of any identified violations or omissions.

The Bank has an extensive branch network and provides its products and services across all regions where it operates. It actively engages with the population, including vulnerable groups. The Bank creates conditions to ensure seamless access to its products and services for persons with disabilities.

Human Rights Risk and Impact Assessment

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As part of the self-assessment, the Bank conducts risk assessment to identify key **potential** human rights violations and to develop measures to prevent and mitigate the direct or indirect impact of its activities on human rights:

01

Risk Identification

Identify any actual and potential impact of the Bank's activities on people

- Identification of any actual and potential human rights impacts associated with both the Bank's business operations and activities of our suppliers and customers, in such areas as: health and well-being, diversity and inclusion, fair wages, discrimination, forced labor, child labor, damage to livelihoods, data protection, access to information, and responsible marketing
- Identification of particularly vulnerable groups, such as women, elderly customers, persons with disabilities, low-income customers, seasonal workers, migrant workers, and Bank employees.

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Inherent Risk Assessment

- Conduction of a human rights risk assessment, **without taking into account any existing mitigation measures/controls**
- Ranking of human rights risks based on severity and likelihood

03

Identification of Mitigation Measures

- Identifying existing mitigation measures/controls and determining their impact on the likelihood that the risks will materialize

04

Residual Risk and Next Steps

- Assessment of residual human rights risks, **subject to existing mitigation measures/controls**
- Ranking of residual risks based on severity and likelihood.
- Identification of priority human rights issues and development of additional measures to minimize risks.

Identified Potential Risks: Direct Impact



Retail Customers

- Unfair practices in:
 - sales of banking products and services
 - handling of customer inquiries
 - debt restructuring and collection
- Transaction failure or error
- Fraudulent or unauthorized actions
- Unlawful blocking or restriction of accounts and/or debiting of funds
- Data privacy
- Data security
- Discrimination
- Accessible environment for persons with disabilities and persons with limited mobility
- Accessibility of digital services



Bank Employees

- Working conditions
- Occupational health and safety
- Discrimination
- Data privacy
- Data security

Identified Potential Risks: Indirect Impact



Corporate Business

Impact on the society and population in the regions of operations

- Environmental Impact
- Working Conditions
- Occupational Health and Safety
- Market conduct violation
- Community rights



Suppliers

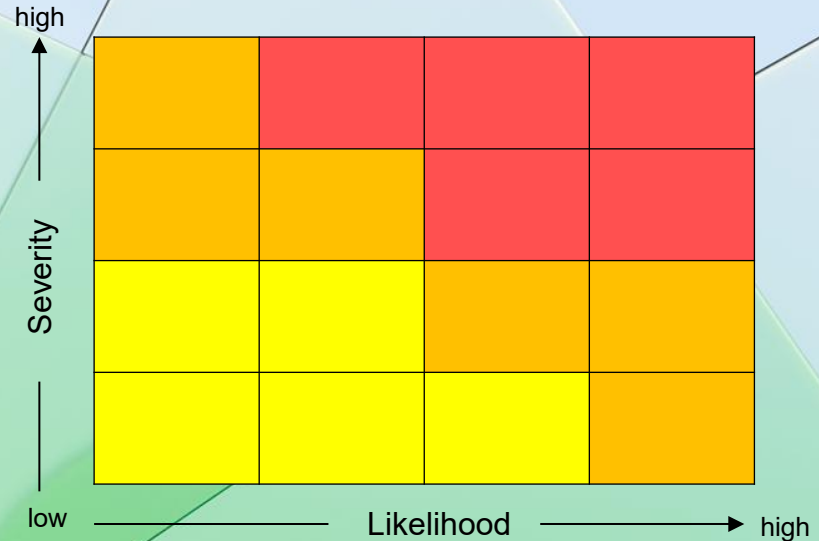
Impact on the society and population in the regions of operations

- Environmental Impact
- Working Conditions
- Occupational Health and Safety

Priority Impact Mapping

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- The Bank's actual and potential impact on human rights was assessed using the 4x4 matrix that takes into account the severity of consequences and the likelihood of events.
- The assessment considers vulnerable population groups, including women, elderly customers, persons with disabilities, low-income customers, seasonal workers, migrant workers, and the Bank employees.
- Impact levels are categorized into three groups: high, moderate, and low.
- In determining the "severity" parameter, a combination of factors was taken into account, including the extent of impact, the number of people affected, the difficulty of remedying adverse consequences, and whether the impact is direct or indirect.
- In determining the "likelihood" parameter, the following combination of factors was taken into account: the presence of vulnerable groups, the nature of business relationships with counterparties, and the existing mitigation measures within the Bank that would reduce the probability of such impact occurring.



- Significant human rights impact that must be addressed through additional prevention/mitigation measures
- Moderate human rights impact, for which existing prevention/mitigation measures have proven sufficient, but there is room for improvement
- Low level of human rights impact due to prevention/mitigation measures taken

Impact Assessment Findings

- R.1 Unfair practices in sales of banking products and services
- R.2 Unfair practices in handling of customer inquiries
- R.3 Unfair practices in debt restructuring and collection
- R.4 Transaction failure or error
- R.5 Fraudulent or unauthorized actions
- R.6 Unlawful blocking or restriction of accounts and/or debiting of funds
- R.7 E.4 Data privacy
- R.8 E.5 Data security
- R.9 E.3 Discrimination
- R.10 Accessible environment for persons with disabilities and persons with limited mobility
- R.11 Accessibility of digital services
- E.1 C.2 S.2 Working conditions
- E.2 C.3 S.3 Occupational health and safety
- C.1 S.1 Environmental impact
- C.4 Market conduct violation
- C.5 Community rights

Severity

			Significant Risks	
	R.2 E.3 C.1	R.3 R.7 R.8 R.10 C.3 C.5	R.1	
	R.5 R.9 E.1 E.4 E.5 S.3	R.11 E.2 C.2 C.4	R.6	R.4
	S.1	S.2		

Likelihood

Direct Impact

- R Retail Customers
- E Bank Employees

Indirect Impact

- C Corporate Business
- S Suppliers

Integration and Management

Customer Rights and Interests

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Risks

- Concealment or misrepresentation of information regarding the material terms and conditions of a banking product and/or service, including its actual cost, applicable interest rates, and fees
- Pressuring a customer to purchase a banking product and/or service, including an additional banking product and/or service when purchasing a primary banking product and/or service, as well as concealing information about the customer's right to decline the purchase of a banking product and/or service, or an additional banking product and/or service.



Affected Stakeholders and Vulnerable Population Groups

- Customers, including: elderly customers, customers with low level of financial literacy, and young customers (who lack experience and understanding of financial risks)



Mitigation Measures

- Monitoring the compliance with the Bank customers' rights and interest through mystery shopping of banking products.
- Oversight of compliance with disclosure standards for banking products and services.
- Analysis of customer complaints to identify recurring cases systemic deficiencies in provision of banking products and services;
- Informing relevant parties (the Bank subdivisions, authorities) of identified deficiencies, including in the development, promotion, and advertising of banking products and services, deficiencies in lending processes, in distressed asset management processes, and in inquiry handling processes.

- The Bank is committed to continuously enhance its positive impact while preventing or mitigating adverse human rights impacts directly linked to its operations, products, and services; it also avoids causing indirect adverse impacts and addresses the consequences of such impacts should they occur.
- The Bank has established a mechanism for submitting and handling inquiries and complaints from external and internal stakeholders, enabling any individual to report concerns regarding human rights violations at the Bank or among the Bank's counterparties.
- The Bank conducts surveys among internal and external stakeholders regarding human rights compliance in the Bank's operations to identify potential risk areas and opportunities for further improving internal processes and control mechanisms.
- Since 2023, the Bank has been publishing its Sustainability Report, which includes the results of implementation of its business and human rights commitments.

Monitoring and Communications Violation Reporting Channels

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Potential violations may be reported, and further information may be obtained, and any questions may be addressed through any of the available communication channels:



Via the Single Contact Channel for Private Customers (505)



By sending an e-mail to info@bcc.kz



By submitting a request at the Bank branch

The Bank employees may use the following contact methods to report potential violations:

hr@bcc.kz – for receiving non-anonymous inquiries from employees



“Rescue Service” is an anonymous reporting channel (accessible via a link in the corporate email system and the Bank’s internal messaging apps). Anonymous reports are accepted for review, but no response is provided.

The Bank guarantees confidentiality when reviewing reports.