



Results of the human rights due diligence procedure at JSC Bank CenterCredit

June 2025



Commitments to Human Rights Compliance

The Bank's Board of Directors has approved a **Human Rights Policy** that defines the principles and commitments of the Bank regarding the respect for human rights at all stages of its activities.

Recognition, observance, and protection of human rights are among the key areas of the Bank's sustainable development activities. Therefore, the Bank strives to:

- continuously increase its positive impact while preventing or mitigating any adverse impact on human rights directly related to the Bank's activities;
- ensure the possibility of receiving feedback on human rights compliance from employees and other stakeholders;
- implement a system for assessing customer satisfaction with the Bank's products, services, and sales channels.



JSC Bank CenterCredit Human Rights Policy

In June 2025, the Bank conducted its first human rights due diligence procedure using the **UNDP Self-Assessment Tool for Companies on Business and Human Rights**, which is based on the UN Guiding Principles on Business and Human Rights.

The results of the self-assessment were approved by the Risk Management Committee under the Management Board of Bank CenterCredit JSC on 17.06.2025

Identification of Stakeholders

Key stakeholders identified by the Bank through its self-assessment procedure in the field of human rights:



Employees: zero tolerance for any form of discrimination or violence, including verbal, physical, and psychological; provision of equal opportunities.



Customers: inadmissibility of any form of customer discrimination; application of responsible finance principles in interactions.



Society and local communities: assessment of potential and ongoing projects for social and environmental impacts.



Suppliers: requirements for suppliers to comply with human rights standards.

To ensure effective engagement, the Bank annually **surveys a broad range of stakeholder representatives** to analyze and monitor the relevance of various sustainability aspects, including human rights, in order to respond promptly to potential social risks and take them into account in its operational activities.

To prevent and eliminate adverse impacts on human rights, the Bank defines its **obligations towards stakeholders**, as well as a **mechanism for submitting and reviewing inquiries and complaints**.

Political and Governance Commitments

Availability of a Public Document in which the Bank Commits to Respect All Internationally Recognized Human Rights in Its Activities



The Human Rights Policy of Bank CenterCredit JSC defines the principles and commitments regarding the respect for human rights at all stages of business operations and is a voluntarily adopted public document.

Communication of the Bank’s Human Rights and Business Commitments at All Levels of Governance



To support strategic decision-making in the area of ESG, since 2023 the Bank has established the **Sustainable Development Committee under the Board of Directors**, which is an authorized collegial body of the Board. The Committee serves as an advisory body and provides recommendations to the Board of Directors on matters related to the Bank’s sustainable development. The **Chief Sustainability Officer (CSO)** is responsible for organizing and coordinating activities aimed at aligning the Bank with the principles of sustainable development (ESG). The **ESG Directorate** is responsible for operational matters in the field of ESG..

Availability of a Human Rights Policy for Bank Employees



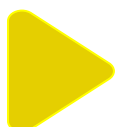
The Human Rights Policy of Bank CenterCredit JSC is a voluntarily adopted public document and includes commitments to respect human rights in relation to key stakeholders, including employees, as well as requirements for engagement with suppliers.

Regular Training and Awareness-Raising on Human Rights for All Staff



In 2024, the Bank initiated human rights training for employees via an internal online platform. The course **“The Bank and Human Rights. The Bank’s Corporate Human Rights Policy”** was completed by over 70% of employees. In collaboration with the European Bank for Reconstruction and Development (EBRD) and Frankfurt School of Finance & Management, the Bank organized a webinar in February 2024 titled **“Human Rights, Diversity and Inclusion in Business”** for employees. Additionally, in Q1 2025, an offline **Gender Awareness Workshop** was held for managers. From February to July 2025, the Bank plans to participate in the UN Global Compact Business & Human Rights Accelerator program.

Availability of Policy and Genuine Engagement with Stakeholders, Including Consultation on Human Rights Impacts



The Sustainable Development Policy defines key mechanisms for stakeholder engagement, including: an annual materiality survey for all stakeholders of the Sustainability Report; employee engagement, loyalty, and workplace climate studies; customer satisfaction surveys, feedback and complaints handling, responsible financing tools; questionnaires for suppliers and contractors; participation in public environmental events; and other mechanisms detailed in the Policy and described in the Sustainability Report. In 2025, the Bank initiated a **human rights self-assessment**, the results of which will be presented to all stakeholders after approval by the ESG Steering Committee.



Fully compliant with best practices



More in line with best practices



Actions must be taken to improve human rights practices

Respect for human rights and implementation of human rights due diligence procedures [1/2]

Conducting Human Rights Risk Assessments Related to the Bank's Activities



In 2023, the Bank identified **key social risks** related to its core operations and main stakeholders. Based on this, feedback channels for internal and external stakeholders were improved, responsible financing tools were developed for corporate clients, and supplier questionnaires were updated to include human rights considerations.

As of December 1, 2024, the following non-financial risks were recognized as relevant:

- Social risk (potential threats to reputation arising from improper interactions with society, including clients, employees, suppliers, etc.);
- Reputational risk (loss of trust from key partners, clients, shareholders, employees, regulators, and the public, having a direct or indirect negative impact on future business).

To enhance reputational risk assessment in terms of human rights violations, the Bank, with EBRD experts, revised the **classification of discrimination-related customer complaints**. The Bank is also regularly assessed on Environmental and Social Risks (including human rights risks) **as part of its cooperation with IFIs**. In 2024, the Bank conducted a **UNDP expert consultation** to evaluate the alignment of its internal regulations with international human rights standards.

Integration of Human Rights Risk Assessment into Existing Risk Management Processes



The Bank annually prepares a risk **assessment report for senior management**. Based on the results, the Bank formulates a **Risk Appetite Statement** approved by the Board of Directors. Until January 1, 2026, the statement includes a provision on reputational risk, declaring the Bank's commitment to protect its reputation and that of its investors and clients, uphold ethical and professional conduct, safeguard client interests, and ensure market integrity (qualitative metric).

On a quarterly basis, information on **reputational risk incidents is reported to senior management**. Based on analysis of potential and actual incidents, **mitigation measures are developed, including for cases of unethical conduct**.

Responsible financing tools are also applied for corporate client risks.

Since 2013, the Bank has implemented a Procedure for Compliance with the **Environmental and Social Management System (ESMS)**, which defines the **approach to environmental and social project assessments** and lists activities excluded from financing (last updated in 2024).

In 2023, the Bank developed Responsible Financing Instruments (RFIs) for corporate clients, applicable to all corporate borrowers based on a materiality threshold. RFIs **include social risk assessments, including human rights risks**.

The 2025 Environmental and Social Risk Management Policy update includes an Exclusion List of activities not eligible for Bank financing, **including those related to harmful, forced, or child labor**, in line with national regulatory requirements.

Respect for human rights and implementation of human rights due diligence procedures [2/2]

Incorporation of Human Rights Due Diligence into Sourcing and Supply Chain Management



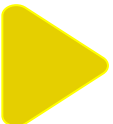
The Bank has an **internal regulation on engagement with counterparties according to ESG rules**. Potential projects undergo ESG questionnaire-based assessments to prevent and mitigate adverse human rights impacts. Additionally, all **suppliers must familiarize themselves** with the **Bank's Code of Corporate Ethics**, which includes human rights provisions, upon registering on the Bank's platform.

Engagement of Rights-Holders in Human Rights Due Diligence Procedures



In 2024, the Bank held a **UNDP expert consultation** to assess the compliance of its internal regulations with international human rights standards. The Bank plans to expand stakeholder consultation practices regarding human rights. Staff responsible for implementing human rights standards regularly undergo training, including UNGC and UNDP programs.

Availability of Human Resources and Budget to Address Negative Human Rights Impacts



Depending on current issues, specific staff and budgets may be allocated to address human rights-related concerns individually. The Bank has a **mechanism for submitting and reviewing complaints** from internal and external stakeholders. Contact channels are available on both internal and external Bank platforms, and designated personnel ensure timely responses to stakeholder concerns. A complaint classification includes "discrimination" as a category to help identify potential human rights violations. Reports on identified cases are prepared regularly.

RFIs are applied to all corporate clients **based on materiality thresholds**. Financing of borrowers or projects with medium, high, or critical E&S risk is subject to enhanced analysis (beyond standard procedures), which includes the definition of additional covenants and the development of an adaptation roadmap. Relevant business processes and **responsible units are defined in internal documents**.

Monitoring the Effectiveness of Due Diligence Efforts



The Bank **commits to providing timely and comprehensive responses to client complaints** and addressing the root causes. Regular **Customer Satisfaction Analysis (CSA) and Voice of the Customer (VOC) surveys** are conducted to assess client satisfaction and collect feedback, including using NPS and CSI methodologies.

Discrimination-related complaints are included in management reporting for reputational risk analysis and **reviewed by senior management**.

Employee grievances are addressed through **the Conciliation Commission**, ensuring effective resolution of labor conflicts. Employee satisfaction and engagement are monitored via the **annual anonymous Happy Job survey**.

In terms of corporate client risks, the Environmental and Social Risk Management Policy provides for monitoring the **implementation of adaptation roadmaps**, where included in loan covenants.

Legal remedies

Availability of a Transparent Channel for Employees to Submit Human Rights Complaints



Bank employees can report potential violations using the following methods:

- **hr@bcc.kz** – for **non-anonymous** staff communications;
- **“Rescue Service” – an anonymous** reporting channel (accessible via corporate email and internal Bank messengers).

The Bank ensures confidentiality when reviewing submissions. The annual anonymous Happy Job employee satisfaction survey also helps identify and address employee concerns.

Availability of Public Complaint Channels/Mechanisms (for Individuals or Communities Outside the Company)

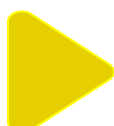


Any person can report potential violations, request additional information, or ask questions using one of the following methods:

- via the unified contact channel for individuals (**505**);
- by sending an email to **info@bcc.kz**;
- by submitting a **request at any Bank branch**.

The Bank commits to providing comprehensive and prompt responses to client complaints, regardless of whether the complaint is deemed justified.

Availability of a Tool or Policy for Assessing Negative Human Rights Impacts



In 2025, the Bank initiated a **human rights self-assessment**. The results will be shared with all stakeholders following approval by the ESG Steering Committee.

Availability of Information on Business and Human Rights Commitments in the Annual Non-Financial Report



Since 2023, the Bank has published a **Sustainability Report**, which includes information on the implementation of its business and human rights commitments.

No human rights violations or discrimination were recorded during the reporting periods, as reflected in the Sustainability Report.

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Activities based on the assessment results

The results of the self-assessment were approved by the Risk Management Committee under the Management Board of JSC Bank CenterCredit on 17.06.2025. Based on the results, the following activities were formulated:

- conduct a **stakeholder survey on human rights** compliance by 31.12.2025.
- conduct a **human rights due diligence** self-assessment procedure **on an annual basis**.
- inform departments registering requests from external clients about changes to the **registration route for discrimination requests**.