



JSC Bank CenterCredit Human Rights Policy

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JSC Bank CenterCredit Human Rights Policy

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1. General

1. This JSC Bank CenterCredit Human Rights Policy (the Policy) defines the principles and obligations of JSC Bank CenterCredit (the Bank) with respect to observance of human rights at all stages of its operations.
2. The Policy is a voluntarily adopted public document that the Bank follows in order to respect human rights in its operational activities.
3. The Bank's subsidiaries are recommended to develop and adopt human rights policies based on the provisions and principles of this Human Rights Policy or to be guided by the provisions of this Policy in their operational activities.
4. The Policy shall apply to relations between the Bank and stakeholders, including employees, suppliers and contractors, customers, local communities and others affected by the Bank's operations.

2. Definitions and Abbreviations

IRD means the Bank's internal regulatory document.

Discrimination means restriction of the Bank customers, suppliers, contractors, employees and other stakeholders in their rights and freedoms, as well as in granting any benefits depending on circumstances and peculiarities not related to their business qualities.

Stakeholders mean individuals and legal entities or groups of individuals or entities in varying degrees involved in the Bank's activities that influence the Bank's performance and/or are influenced in their decisions and activities by the Bank.

UN means the United Nations; an international organizations whose stated purposes are to maintain and strengthen international peace and security, promote cooperation between States.

OECD means the Organization for Economic Cooperation and Development – an international economic organization of developed countries.

Human rights are the inalienable right of every human being, based on recognition of dignity, freedom and equality.

Forced labour means any activity, work or service exacted under threat of coercion or punishment.

Employee means an individual who has an employment relationship with the Bank and directly performs work under an employment contract.

ESG (Environmental, Social, Governance) means the Bank's approaches in financing, investing and other activities, involving assessment of the following factors in decision-making:

- environmental and climate factors that determine the Bank's role in protecting the environment and in the global and national climate agenda;
- social factors that determine approaches to relations with employees, suppliers, customers and society;
- corporate governance factors reflecting approaches to governance in terms of the Bank's management, executive remuneration, audit, internal control and shareholder rights.

3. Underlying Principles

5. The Policy has been developed in accordance with the human rights principles stipulated by the Constitution and the Labour Code of the Republic of Kazakhstan, and also takes into account a number of international human rights principles and documents, including, but not limited to:
 - the Universal Declaration of Human Rights;
 - UN Guiding Principles on Business and Human Rights;

- Principles for Responsible Banking developed under the UNEP FI;
 - OECD Guidelines for Multinational Enterprises.
6. The Bank shall be guided by the following basic principles in its activities:
- 1) respect for human dignity and human rights;
 - 2) unacceptability of any forms of discrimination;
 - 3) observance of employees' right to freedom of assembly and association, freedom of opinion and expression;
 - 4) inadmissibility of the use of child labour and forced labour;
 - 5) ensuring decent working conditions and its compensation;
 - 6) ensuring a safe and healthy working environment;
 - 7) unacceptability of any form of violence;
 - 8) respect for the rights, cultural peculiarities and customs of local communities.
7. In order to implement the principles of this Policy, the Bank shall be guided by the following internal regulatory documents:
- 1) JSC Bank CenterCredit Employee Code of Corporate Ethics;
 - 2) JSC Sustainable Development Policy;
 - 3) JSC Bank CenterCredit Regulation on Acquisition of Fixed Assets, Intangible Assets, Inventory, Works/Services;
 - 4) JSC Bank CenterCredit Anti-Corruption Policy;
 - 5) JSC Bank CenterCredit Responsible Financing Policy.

4. Obligations to Respect Human Rights Towards Significant Stakeholders

8. The Bank shall strive to continuously increase positive impact on and at the same time to prevent or mitigate adverse impact on human rights that are directly linked to our operations, products and services, and avoid indirect adverse impact, address the consequences of such impact where they occur.

4.1. Obligations towards employees

9. To prevent and eliminate any adverse impact on human rights, the Bank shall be guided by the following principles with respect to its employees:
- 1) comply with the labour legislation of the Republic of Kazakhstan and adhere to the generally accepted moral and ethical norms;
 - 2) maintain a safe and comfortable working environment by ensuring proper organization of all workplaces, necessary sanitary, hygienic and material working conditions;
 - 3) provide equal opportunities to each Bank employee for career growth, irrespective of nationality, race, gender, age, sexual orientation and religion;
 - 4) provide employees with equal remuneration for equal work;
 - 5) train and develop employees, fostering a culture of engagement;
 - 6) recognize the workers' right to assemble, freedom of association, the right to establish or join organizations representing their interests (trade union organizations) without fear of any repercussions;
 - 7) Protect the worker from harassment and discrimination for complaining about any form of violence against him/her;
 - 8) Any form of patronage, including those based on family ties, shall be unacceptable, and every employee shall be responsible for compliance with applicable equality laws and regulations;

- 9) Any form of discrimination against employees based on gender, age, ethnicity, nationality, religion, world view, physical ability, orientation, skin colour, marital status, political beliefs, origin and other individual characteristics shall be unacceptable;
- 10) Any form of violence at the workplace, including verbal, physical and psychological violence, shall be prohibited;
- 11) the use of child labour or any other form of forced labour shall be prohibited.

4.2. Obligations towards the society and population in the regions of operation

10. The Bank has an extensive branch network and provides the Bank products and services in all regions where it operates. The Bank actively interacts with the population, including vulnerable segments of the population.
11. The Bank shall create conditions allowing the persons with disabilities to have unimpeded access to the Bank products and services through:
 - 1) compliance with the requirements for ensuring accessible environment in the Bank branches;
 - 2) implementation of online banking, including via mobile application
12. The Bank shall strive to provide improving conditions for customers belonging to socially vulnerable groups of population within the framework of its products and services.
13. Following the principle of due care, the Bank shall perform an environmental and social impact assessment procedure for potential projects according to criteria developed by the Bank. This will enable the Bank to manage environmental and social risks when financing the corporate customer projects.

4.3. Obligations towards customers

14. The Bank shall build relations with customers on the basis of the following principles:
 - 1) exclusion of any activity that may damage business reputation, other non-material and material interests of customers;
 - 2) inadmissibility of any form of customer discrimination based on gender, age, ethnicity, nationality, religion, world view, physical abilities, orientation, skin colour, marital status, political beliefs, origin and other individual characteristics;
 - 3) maintenance of confidentiality of any information, including personal customer data, as well as other information that may damage business reputation, other non-material or material interests of customers, if disclosure of such information is not provided by the laws of the Republic of Kazakhstan;
 - 4) inadmissibility of groundless refusal to provide Bank products and services to the customer;
 - 5) timely response to customers' comments, complaints and claims addressed to the Bank, taking measures to remedy the consequences of committed violations and omissions.
15. The Bank shall design, implement and develop responsible financing approaches, methods and mechanisms.
16. In JSC Bank CenterCredit Responsible Financing Policy, the Bank shall define a list of activities that are not financed by the Bank when reviewing loan applications of corporate customers (Exclusion List), as these activities may have an adverse impact on the health of various stakeholder groups and deteriorate the environment (discriminating the human rights to have access to a favourable environment).
17. The Bank shall perform an environmental and social impact assessment for potential projects of corporate borrowers and make decisions based on the assessment results.

4.4. Obligations when interacting with Suppliers

18. The Bank's suppliers must comply with all requirements of the laws of the Republic of Kazakhstan relating to their activities and meet high ethical standards of business conduct.
19. The Bank shall strive to support its suppliers to ensure that they respect human rights in their operations.
20. When carrying out their operations, the Bank's suppliers shall not allow:

- 1) any form of discrimination based on gender, age, ethnicity, nationality, religion, world view, physical ability, orientation, skin colour, marital status, political beliefs, origin and other individual characteristics;
 - 2) any form of violence at the workplace, including verbal, physical and psychological violence;
 - 3) the use of child labour or any other forms of forced labour.
21. Requirements for suppliers and their obligations as business partners of the Bank are defined in the IRDs describing interaction with suppliers and contractors.
 22. If a supplier for any reason cannot meet the requirements listed in the document, the Bank shall be open for dialogue with the company in order to find and adopt the most appropriate solution.

4.5. Obligations towards representatives of other stakeholders

23. On an annual basis, starting from 2023, the Bank shall conduct survey of a wide range of stakeholder representatives to analyze and monitor the relevance of various sustainable development aspects, including human rights, in order to respond to potential social risks in a timely manner and to take them into account in its operations.

5. Application and Complaint Submission, Review Mechanism

24. The Bank has developed a mechanism for submitting, reviewing applications and complaints from external and internal stakeholders, through which anyone can report their concerns about human rights violations at the Bank or the Bank's counterparties.
25. It is possible to report potential violations, obtain additional information and ask any questions through any of the below communication methods:
 - 1) direct address to the Chief Compliance Officer on the Bank's external website at: www.bcc.kz, Questions and Answers heading, Compliance Control section;
 - 2) sending a written communication/ memo to the Chief Compliance Officer and/or the Head of Sustainable Development Directorate (ESG).
26. An employee or other representative of a stakeholder shall not be subjected to retaliation as a result of reporting in good faith and informing the Bank's responsible employees of their concerns or suspicions with regard to non-compliance with the provisions and principles of this Policy.
27. All applications shall be subject to review, investigation and action within 15 calendar days in order to resolve the situation if necessary.

6. Final Provisions

28. All Bank employees shall be liable for breaching the provisions of this Policy in accordance with the laws of the Republic of Kazakhstan and internal regulatory documents of the Bank.
29. The Bank will improve this Policy subject to changes in legislation and emergence of new human rights standards in international and domestic practice.
30. The Policy shall be approved by the Bank's Board of Directors.
31. The Policy shall be revised at least once a year. The Sustainable Development Directorate (ESG) shall be responsible for revision and updating the Policy.