



JSC Bank CenterCredit Anti-Corruption Policy

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Management Board
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JSC Bank CenterCredit Anti-Corruption Policy

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1. General

1. This JSC Bank CenterCredit Anti-Corruption Policy (hereinafter referred to as the Policy) has been developed in accordance with the laws of the Republic of Kazakhstan and internal regulatory documents of JSC Bank CenterCredit (the Bank).
2. The purpose of the Policy is to strengthen control over prevention and detection of corruption, and to establish the principle of zero tolerance for corruption in the Bank.
3. The objective of the Policy is to build a culture for the Bank employees that ensures observance of the principles of integrity and transparency in performing their job/functional duties and intolerance to corruption.
4. All Bank employees shall be guided by this Policy and shall strictly comply with its principles and requirements.

2. Terms, Definitions and Abbreviations

Bank means JSC Bank CenterCredit.

Close relatives mean parents (a parent), children, adoptive parents, adopted children, full and half siblings, grandparents, grandchildren.

Relatives mean persons who are related to each other, sharing common ancestors up to great-grandparents.

SC means the Bank's Security Center.

Bank Employees mean any individual who has an employment relationship with the Bank.

Anti-corruption means the Bank's activities aimed at:

- prevention of corruption, including identification and subsequent elimination of causes and factors conducive to commitment of corrupt practices (corruption prevention);
- detection, combating, disclosure and investigation of corruption practices, elimination of their consequences (combating corruption).

Conflict of Interests means a situation when a contradiction arises between personal interest of the Bank officials, its shareholders and (or) its employees and proper performance of their official duties or property and other interests of the Bank and (or) its employees and (or) customers, which will result in adverse consequences for the Bank and (or) its customers.

Corruption and corrupt practices mean:

- Offering, promising, giving and receiving an unlawful advantage, whether tangible or intangible, in any form, directly or through intermediaries, including in the form of bribes and commercial bribery;
- and/or intermediation when performing a corrupt act;
- and/or abuse of official position, abuse of authority, and other illegal use by an individual of his/her official position contrary to the legitimate interests of the Bank, including for the purpose of obtaining an unlawful advantage, tangible and intangible, for himself/herself or third parties, or unlawful provision of such advantage to the said individual by other individuals.

Corruption Prevention means studying, identifying, limiting and eliminating causes and factors conducive to the commitment of corrupt practices by developing and implementing the system of preventive measures.

Top Executive of the Bank means the Head and members of the governing bodies, the Head of the executive body, his/her deputies and members of the executive body, other managers of the Bank coordinating and (or) controlling activities of the Bank's structural subdivisions and having the authority to sign documents on the basis of which banking operations are carried out, Chief Accountant, Deputy Chief Accountant.

Top executive officers of the Bank's separate subdivisions and their Chief Accountants, as well as persons authorized to sign documents on the basis of which banking operations are carried out, and exercising control over activities of only one structural subdivision shall not be the Bank's top executives.

Valuable Gifts (presents) mean money, securities, treats, tangible assets, services rendered free of charge but payable, as well as benefits entitling to perform construction, repair works; provision of sanatorium or tourist vouchers, travel tickets; granting loans on preferential terms, etc.

3. Basic Anti-Corruption Principles

5. The basic anti-corruption principles in the Bank shall include:

- 1) **Zero tolerance** to any manifestations of corruption - the Bank shall adhere to the principle of complete rejection of corruption in any forms and manifestations in carrying out its activities. The principle of zero tolerance to any manifestations of corruption shall mean a strict prohibition for the Bank officials and employees acting on behalf of the Bank or in its interests, directly or indirectly, personally or through any intermediary, to participate in corrupt practices;
- 2) **Unavoidability of punishment** - the Bank declares the inevitability of punishment of the Bank employees irrespective of their position, length of service and other conditions if they commit corrupt acts in the performance of their official duties;
- 3) **Involvement of employees** - the Bank encourages active participation of its employees in building and implementation of anti-corruption measures;
- 4) **Due diligence** - the Bank shall screen third parties and candidates for employment before making a decision on commencement or continuation of business/employment relations for their reliability, intolerance to corruption and absence of conflict of interest.

6. The Bank shall not attract or use counterparties or other persons to perform actions contrary to the principles and requirements of this Policy and norms of the anti-corruption laws of the Republic of Kazakhstan.

7. The Bank employees shall be strictly prohibited, directly or indirectly, personally or through the intermediation of third parties, close relatives, from being involved in corrupt practices, offering, giving bribes, abuse of authority in order to simplify administrative and other formalities, or to obtain benefits in the form of money, valuables, other property or services/material/non-monetary benefits, other property rights for themselves and/or for close relatives, third parties.

4. Anti-Corruption Measures

8. All Bank employees shall strictly adhere to the requirements of this Policy. The principle of zero tolerance to corruption in any of its forms and manifestations shall be established for all employees of the Bank when carrying out current and project operations.

9. In carrying out its operations, the Bank shall take the following measures to prevent corruption, including to minimize causes and factors conducive to committing corruption offences, by:

- 1) establishing organizational and legal framework ensuring transparency of decision-making procedures;
- 2) observing the principles of fair competition and preventing conflicts of interest;
- 3) adopting and complying with the business ethics standards;
- 4) taking measures to build an anti-corruption culture to preserve and strengthen the system of values reflecting intolerance to corruption, which are implemented through a set of educational, informational and organizational measures;
- 5) preventing and resolving conflicts of interest. All Bank employees shall take measures to prevent and resolve conflicts of interest. The conflict of interest management procedure, including procedures for its prevention, identification, settlement and resolution in respect of the Bank employees shall be governed by the Bank's internal documents.

5. Corruption Offence Reporting

10. The Corruption Offence Reporting Channel has been created to enable employees and other persons to confidentially or anonymously express their reasonable observations and suspicions of corruption offences by sending information from any other source to this e-mail address: fraudinfo@bcc.kz
11. For all corruption offence reports, the Bank shall conduct an inspection or official investigation in accordance with the terms of the Regulation on Organizing and Conducting Official Investigations by JSC Bank CenterCredit Security Center, with the involvement of the Bank's relevant structural subdivisions.

6. Gift Handling Rules

12. The Bank officials, top executives and employees shall refrain from direct or indirect receipt of valuable gifts from persons or organizations that expect the Bank to make any decisions (except for symbolic favours in accordance with the common courtesy rules or souvenirs at official events).
13. The Bank officials, top executives and employees shall refrain from direct or indirect receipt of valuable gifts as a result of which this person may influence the relevant decision-making in favour of the presenter and the person concerned.
14. In case of receiving valuable gifts (except for symbolic favours in accordance with the common courtesy rules or souvenirs at official events), this fact shall be reported to the Head of the relevant structural subdivision of the Bank. The Head of the Bank's structural subdivision shall take measures to return ant valuable gift, etc.
15. If valuable gifts were granted by close relatives / relatives in-law / relatives/spouse of the Bank official or top executive with his/her consent or if he/she did not object to such gift and used his/her official powers in favour of the interested party, the actions of the Bank employee shall be regarded as receipt of a valuable gift.
16. If receipt of valuable gifts (except for symbolic favours in accordance with the common courtesy rules or souvenirs at official events) is concealed, the Bank employee shall be held liable in accordance with the applicable laws of the Republic of Kazakhstan and internal regulatory documents of the Bank.
17. If the Head of a subdivision believes that information received by him/her is important, he/she shall attach a copy of the communication and report to the Chief Compliance Officer, in accordance with the provisions of JSC Bank CenterCredit Employees' Corporate Ethics Code.
18. The Gift Handling Procedure regulated by this Policy shall company with the provisions of JSC Bank CenterCredit Employees' Corporate Ethics Code.

7. Charity and Sponsorship Activities

19. The Bank shall implement a unified charity policy aimed at creating the Bank's image as a socially responsible business.
20. The Bank shall not finance charitable and sponsorship projects to gain commercial advantages in specific projects of the Bank.
21. Charity and sponsorship can be performed only in cases of full transparency and openness, in accordance with the applicable laws of the Republic of Kazakhstan and the Bank's internal regulatory documents.
22. The Bank shall not be involved in the activities of political and religious organizations and shall not finance their activities. Campaigning in favour of any political party or candidates, and dissemination by employees of their religious and political views and beliefs shall not be allowed on the Bank's territory.
23. The Bank employees shall be prohibited from giving gifts, making contributions for political purposes or organizing entertainment events to support political parties or candidates for political office on behalf of the Bank.

8. Countering Corrupt Practices while Interacting with Customers, Counterparties and Others

24. The requirements of the Policy shall be observed when the Bank establishes contractual and other business relations with individuals and legal entities. The Bank expects its customers, counterparties and other persons, as well as their representatives and employees, to comply with the relevant obligations to counteract corrupt practices, which may be stipulated in the Bank agreements concluded with them or directly arise from the laws of the Republic of Kazakhstan, the national laws of the country of registration and (or) business operations of the said persons and the standards of international law.
25. The Bank shall apply reasonable efforts available under the circumstances to minimize the risk of breaching applicable anti-corruption laws of the Republic of Kazakhstan when establishing business relations with customers, counterparties and other persons who have been or may be involved in corrupt practices.

9. Responsibility

26. All Bank employees, regardless of their position, shall be personally liable for observance of the principles and requirements of this Policy, and for actions (inaction) of their subordinates violating these principles and requirements.
27. Breach of requirements of this Policy may serve as a basis for imposing disciplinary penalties and entail civil, administrative or criminal liability in accordance with the laws of the Republic of Kazakhstan.

10. Final Provisions

28. The Internal Security Directorate of the Security Center shall be responsible for supervision over observance of the Bank's Anti-Corruption Policy.
29. This Policy may be revised in accordance with the decisions of the Bank's collegial bodies or the requirements of the applicable laws of the Republic of Kazakhstan.
30. If the provisions of this Policy contradict to the norms of the laws of the Republic of Kazakhstan, the norms of the laws of the Republic of Kazakhstan shall apply.