centercredit

Sustainability Report

Sustainable heritage – innovative approach



2024

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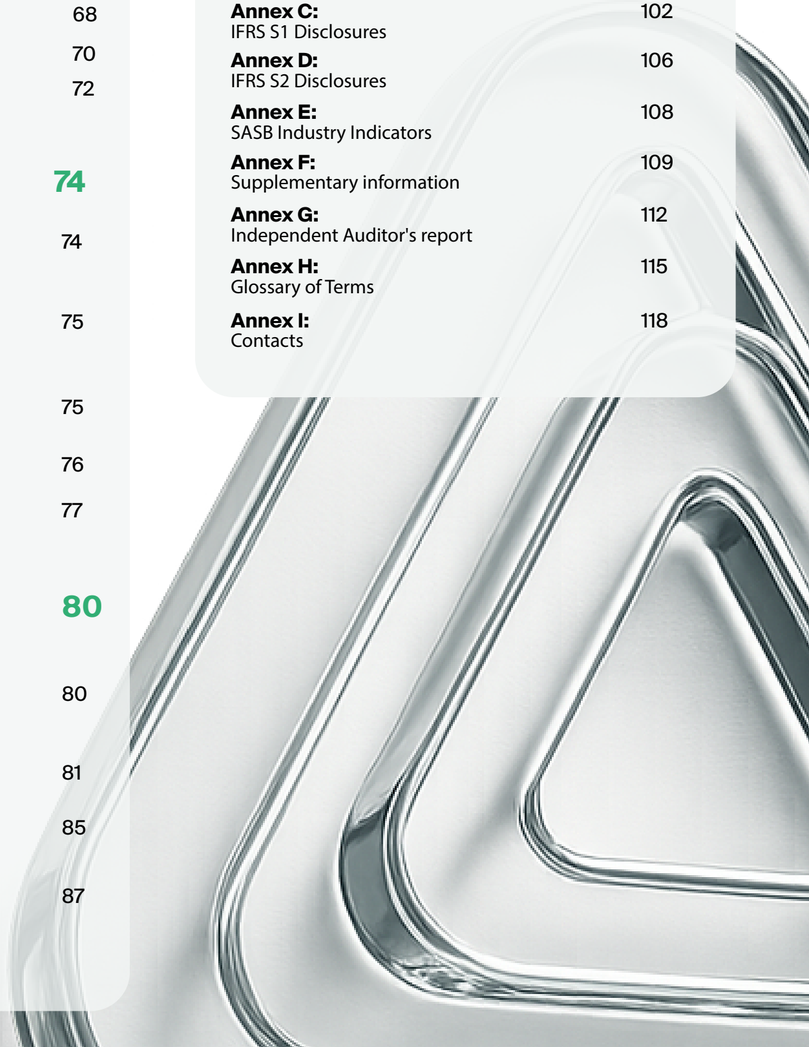
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Message from the Chairman of the Board of Directors

Dear shareholders and clients!

The past year has demonstrated that the banking sector remains a pillar of economic growth, demonstrating high stability even in difficult external conditions. I am pleased to note that in the context of moderate economic growth in the country and new trends in international markets, Bank CenterCredit has managed not only to maintain stability, but also to significantly strengthen its position.

In 2024 we achieved significant positive results. Due to accurate risk management, the use of modern technologies and the efficiency of operations, the net profit of the Banking Group increased by 50%, exceeding 202 billion tenge. Assets reached 7 trillion tenge, with an increase by 1.8 trillion tenge. Our market share increased to 11.4%, confirming our status as one of the leading banks in Kazakhstan.

However, financial success is only one side of the coin. We have managed to make a significant step forward in terms of Environmental, Social, and Governance (ESG). We are convinced that following the ESG principles is a prerequisite for building sustainable competitive advantages and ensuring the long-term effectiveness of our activities. In 2024, the Bank's Development Strategy was updated, it includes the principle of long-term sustainable development in relation to all aspects of the Bank's activities. For the first time among Central Asian financial institutions, Bank CenterCredit has approved a Climate Strategy aimed at reducing its environmental impact and supporting the transition to a low-carbon economy. Today, we are already working to increase the volume of green and sustainable financing, setting an ambitious goal of reaching 400 billion tenge by 2030. These investments will be aimed at supporting eco-friendly projects and initiatives, creating the foundation for a cleaner and safer planet. In addition, we have set a clear goal to significantly reduce our own carbon dioxide emissions. By the end of the decade, we plan to reduce CO_2 emissions by 42% compared to 2023.

The most important outcome was the high assessment of our successes by international experts. The international agency S&P Global CSA awarded the bank a high rating, placing us in the prestigious 91st percentile among global banks. This position underscores our commitment to responsible business conduct and opens the door to new opportunities to attract responsible clients and investors.

Realising the need for active technological renewal, the Bank continued to expand the ecosystem. Two subsidiaries have been established: BCC Life insurance company, focused on life insurance, and BCC Hub, specialising in the development of innovative IT products.

International rating agencies have recognised our achievements by upgrading the Bank's credit ratings to BB (S&P) and Ba1 (Moody's), confirming investor confidence and strengthening our position in the international financial market.

In the coming period, our task is to further deepen the role of Bank's CenterCredit role as a reliable partner for every citizen and entrepreneur of Kazakhstan, as well as a company that takes a responsible attitude to environmental protection. We continue to actively develop modern digital solutions, make banking services more accessible and understandable, create a favourable social environment and take care of natural resources.

Thank you for your trust and support!

Chairman of the Board of Directors
JSC Bank CenterCredit

Bakhytbek Baiseitov



Message from the President

GRI 2-22

Dear partners, clients and colleagues!

This is the second Sustainability Report of JSC Bank CenterCredit, a document reflecting not only our achievements in 2024, but also our strategic commitment to the principles of responsibility and transparency. This report is a mirror of our philosophy, decisions and our role in building a sustainable future for Kazakhstan.

In 2024 the Bank continued its systemic ESG transformation. The updated ESG Strategy until 2030, which we have adopted, is not just a declaration, but a clear roadmap of actions aimed at integrating environmental, social and governance factors into the Bank's daily operations. Our work focuses on specific measures, including the transition to energy efficient use of resources, minimising environmental impacts and related risks for the bank, improving the working conditions of employees and effective interaction with our clients and investors. We have approved a Climate Strategy aimed at achieving carbon neutrality, and have started implementing key initiatives: climate stress testing, labelling of the loan portfolio, and preparation for the issuance of green bonds.

The 2024 financial results confirm the sustainability of our business model. We are actively developing entrepreneurship support programs. In 2024, 3,005 loans were issued in the amount of 81.8 billion tenge in support of small and medium-sized businesses. 7,186 investment projects worth 282 billion tenge were financed through the Damu Fund.

Digital transformation remains our priority. We have launched the BCC 4.0 mobile app, expanded online lending, and implemented AI solutions in customer service and fraud prevention. The Customer Satisfaction Index reached 4.75 out of 5, and the Net Promoter Score (NPS) was 23% among individuals and 28.4% among legal entities.

We are proud of our team. The Bank employs 7,692 employees, of which 66.3% are women, and 53% of them hold senior positions. In 2024, we conducted more than 200 training programs, launched the BCC Academy, the School of Leadership and the School of Project Management.

Social responsibility is an integral part of our mission. In 2024, we allocated more than 6.6 billion tenge for charitable and social projects. We have supported more than 130 initiatives in education, healthcare, culture, sports and ecology.

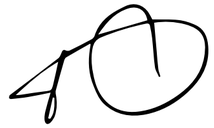
In the environmental area, we continue to reduce our own carbon footprint: electricity consumption amounted to 6.2 million kWh, heat – 5,245 Gcal, and water – 14.4 thousand m3. The total reduction in energy use (in GJ) compared to 2023 was 4%. For the first time in the reporting period, the Bank acquired IREC certificates confirming the use of renewable energy sources. 103.3 tons of waste were transferred for recycling, separate waste collection projects covered 14 regions. We continue to develop the Green Office project.

We are confident that sustainable development is not only a responsibility, but also an opportunity. An opportunity for growth, innovation, building trust and creating long-term value for all stakeholders. We thank everyone who shares these values with us and invite you to an open dialogue and partnership.

I sincerely thank the entire team of JSC Bank CenterCreditt for your professionalism, creativity and daily dedication. Your contribution is the main reason for our achievements and successes.

President JSC Bank CenterCredit

Ruslan Vladimirov



Sustainable heritage — innovative approach



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Message from the President

1. About the Report

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1.3. The Bank's key events in sustainable development

1.4. Key events for 2024

2. Corporate governance

3. Bank's contribution to achieving UN Sustainable development goals

4. Respect for human rights, business ethics and anti-corruption

5. Interaction with customers and suppliers

6. Interaction with personnel

7. Responsibility to society

8. Environmental responsibility

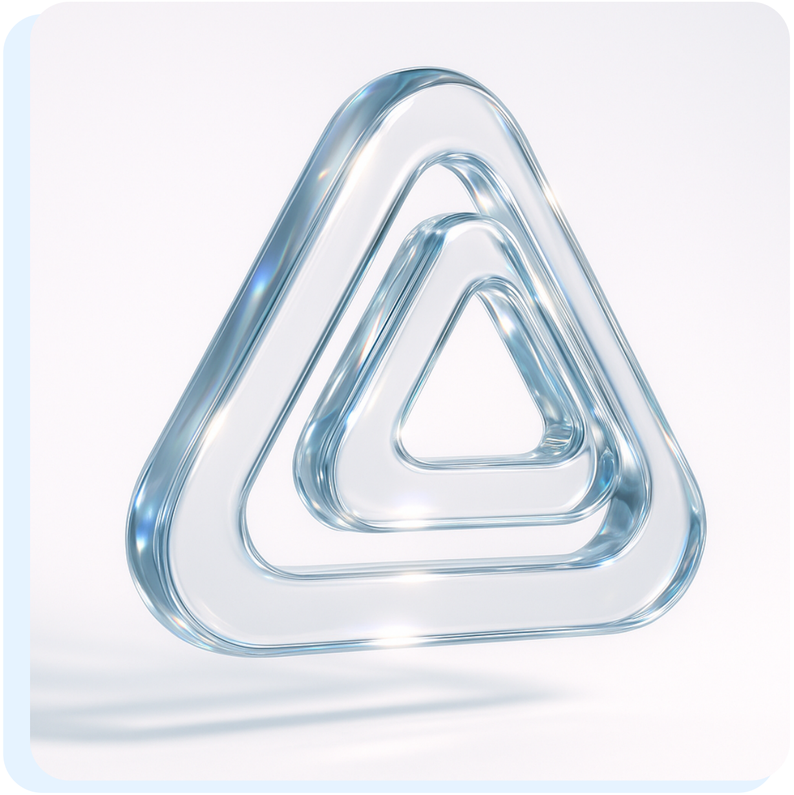
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About the Report

Approach to reporting

GRI 2-1, 2-3, 2-5

The Sustainable Development Report is a comprehensive summary of the activities of the Bank and its subsidiaries (the Group) related to stakeholder engagement, professional development of employees, respect for human rights, reducing environmental impacts, and advancing the country's economic progress. The document reflects the principles of responsible business conduct based on the United Nations Sustainable Development Goals (SDGs), and takes into account the interests of all key partners of the Bank: clients, investors, suppliers, employees and society.



This is the Bank's second non-financial report covering the period from 1 January to 31 December 2024. The reporting dates correspond to the time frame of the Bank's consolidated financial statements.

In preparing the report, the Bank used the recommendations of the Agency of the Republic of Kazakhstan for Regulation and Development of Financial Market (ARDFM), the Global Reporting Initiative Standards (GRI), Standards for the financial sector (Commercial Banks, Consumer Finance, Mortgage Finance), developed by the Sustainability Accounting Standards Board (SASB), and also took into account the recommendations of IFRS S1 "General Requirements for Disclosure of Sustainability-related Financial Information" and IFRS S2 "Climate-related Disclosures". This allowed for comprehensive coverage of key aspects of sustainable development.

The report has undergone an independent limited assurance in accordance with the requirements of the International Auditing Standard ISAE3000, designed to verify information other than an audit or review of historical financial statements.

The scope of services for the independent limited assurance and verification of the sustainability report of JSC Bank CenterCredit for 2024 was performed in relation to the following list of verifiable indicators:

- 2-7 (a) Employees
- 2-9 (a-b) Governance structure and composition
- 2-12 (a) The role of the highest governance body
- 2-26 (a, i-ii) Mechanisms for seeking advice and raising concerns
- 2-27 a (i-ii) Compliance with laws and regulations
- 2-30 (a) Collective bargaining agreements
- 3-1 (a (i-ii), b) Process to determine material topics
- 3-2 (a) List of material topics
- 201-1 (a, i-iii) Direct economic value generated and distributed
- 201-4 (a, i-viii) Financial assistance received from the Government
- 205-3 (a) Confirmed incidents of corruption and actions taken
- 207-1 a (i-ii) Approach to tax
- 303-3 (a, i-v) Water withdrawal
- 305-1 (a) Direct greenhouse gas emissions (Scope 1)
- 305-2 (a) Indirect greenhouse gas emissions (Scope 2)
- 306-4 (a) Waste diverted from disposal
- 401-1 (a, b) New employee hires and employee turnover
- 401-2 (a, ii, iv, vii: financial assistance, namely birth salary) Benefits provided to full-time employees that are not provided to temporary employees
- 401-3 (a, b) Parental leave
- 403-1 (a, i) Occupational health and safety management system
- 403-5 (a) Worker training on occupational health and safety
- 403-9 (a, i-v) Work-related injuries
- 404-1 (a, i-ii) Average hours of training per year per employee
- 404-3 (a) Percentage of employees receiving regular performance and career development reviews
- 405-1 (a, i-ii, b, i-ii) Diversity of governance bodies and employees
- 405-2 (a) Ratio of basic salary and remuneration of women to men
- 415-1 (a) Total monetary value of in-kind financial and political contributions made directly by the organisation, by country and recipient / beneficiary
- 418-1 (c) Substantiated complaints concerning breaches of customer privacy and losses of customer data

Reporting boundaries

GRI 2-2, 2-4

As part of the report, non-financial information is disclosed primarily within the Bank's borders, and also partially covers subsidiaries (the Group). This approach is determined by the current level of maturity of data collection and consolidation processes, as well as the degree of influence of relevant companies on key aspects of sustainable development. The Bank consistently develops internal monitoring and reporting mechanisms, aiming to gradually expand the scope and unify the perimeter of disclosure of non-financial indicators with the perimeter of consolidated financial statements.

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JSC Bank CenterCredit



BCC Invest JSC

100%

Brokerage and dealer activities in the securities market



BCC Project LLP

100%

Acquisition and management of non-operating assets of the Bank



BCC Leasing LLP

100%

Financial leasing services, including lease and subsequent purchase



Sinoasia B&R Insurance JSC

92.45%

Provision of general insurance services



BCC-HUB LLP

100%

Development, implementation and automation of processes



KSZh BCC Life JSC

100%

Services in life insurance

Principles for defining the content and quality assurance of the Sustainability Report

GRI 3-1

When preparing the Report, the Bank was guided by the following principles of GRI Standards:

- Sustainability context in the Report
- Materiality
- Completeness
- Accuracy
- Clarity
- Balance
- Comparability
- Verifiability
- Timeliness

Group profile

JSC Bank CenterCredit is one of the largest financial holdings in Kazakhstan, providing services since 1988. The holding company consists of a Bank and six subsidiaries, providing a wide range of financial services.

The company is known for its innovative approaches, personal service and active participation in government business support programs. Today, Bank CenterCredit is one of the leading players in the financial market of Kazakhstan, having established itself as a reliable partner for businesses and the public.

The Bank's head office is located in Almaty, at 38 Al-Farabi Avenue.



The Bank's key events in sustainable development

EBRD award
BCC is the most active issuing bank in Kazakhstan according to the EBRD

Approval of the Bank's Climate Strategy, the first among Central Asian banks

Inclusion of the Bank's case in the UNGC Global Case Study Playbook

Approval of ESG strategies within the framework of the Strategy of the Bank and the Banking Conglomerate

PWC award
The best disclosure of ESG information in the financial sector

Publication of the Bank's first non-financial statements assured by KPMG auditors

The Bank is a finalist in the Pioneers in Achieving the SDGs in Central Asia (UNGC) competition

The highest ESG score from S&P CSA among the STBs of the Republic of Kazakhstan

Seminar on sustainable development for corporate clients of the Bank

KASE award
The best ESG report among financial organisations

Key events for 2024

GRI 2-1; 2-2; 2-3; 2-4; 2-5; 3-3

During the reporting period, the Bank demonstrated the achievement of maximum performance in the main areas of its activities.

Ratings

S&P Global Ratings

BB

Stable
12.12.2024

Moody's

Ba1

Positive
12.09.2024



Key performance indicators of the Group

GRI 3-3

Assets
million tenge

7,067,889
2024

5,291,039
2023

4,323,966
2022

Net interest income
million tenge

358,382
2024

257,551
2023

135,246
2022

Loans (net)
million tenge

3,860,538
2024

2,928,849
2023

2,009,113
2022

Provisioning
million tenge

56,592
2024

43,075
2023

41,687
2022

Capital
million tenge

637,887
2024

419,366
2023

273,851
2022

Net profit
million tenge

202,419
2024

135,246
2023

145,129
2022

Key indicators in sustainable development

Green Agenda initiatives

~ 156,854
tons of CO_2 equivalent per annum

Reduction of CO2 emissions since the beginning of the second phase of GEFF in BCC (from the end of 2023) within the framework of the program for financing projects in the area of green economy

Social agenda initiatives

8.14
billion tenge

Social investments in charitable projects in education, healthcare, ecology, culture and sports, as well as employee support

421,288
million tenge

Direct economic value created

52,381
million tenge

Tax deductions including CIT

Employees

66%

Proportion of women among the Bank's employees

53%

Proportion of women among senior staff

Ecology

4%

The total reduction in energy use (in GJ) compared to 2023

1,000 MWh

Use of renewable energy sources:

103.3 tons

Transfer of recyclables for disposal and recycling



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2024 Sustainability Report



Message from the Chairman of the Board of Directors

Message from the President

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2. Corporate governance

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Corporate governance

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-17, 2-18, 2-19, 2-20, 2-21, 2-22, 2-23, 2-24, 2-29, 3-3, 201-2, 405-1, SASB FN-CB-410a.2, IFRS S1

BCC recognises that the quality of corporate governance plays a crucial role in ensuring the Bank's sustainability and long-term success.
Transparency in the implementation of its activities by all participants of corporate governance is the basis for effective operation and investment attractiveness of the Bank. Effective corporate governance underpins the Bank's operations, strategic decisions, and relations with shareholders, customers, and other stakeholders. This section describes in detail the Bank's governance structure, its approaches to managing sustainability issues, as well as risk management, internal control and audit.

Corporate governance system

GRI 2-9, 2-10, 2-11, 2-18, 2-19, 2-20, 2-21, 3-3, 405-1

BCC pays great attention to the organisation and implementation of corporate governance as one of the key elements of ensuring the Bank's sustainability, operational and financial efficiency growth.

The key objectives of the Bank's corporate governance system are:

- Exercising the rights of the Bank's shareholders
- Increasing the transparency of the Bank's activities
- Creating effective risk assessment mechanisms that can affect the value of the Bank's assets
- Efficient use of funds provided by shareholders

Corporate governance at JSC Bank CenterCredit is carried out in accordance with the Corporate Governance Code. The document was updated by the Shareholders' meeting in 2023, taking into account the Bank's best practices and commitment to the principles of sustainable development and is based on the following principles:

- Corporate governance is based on respect for the rights and legitimate interests of the Bank's shareholders and staff, and contributes to its effective operation.
- Transparency in the implementation of its activities by all participants of corporate governance is the basis for effective operation and investment attractiveness of the Bank.
- Following the principles of corporate governance ensures the creation of an effective approach for conducting an objective analysis of the Bank's activities and receiving appropriate recommendations from analysts, financial consultants, and rating agencies.
- The risk management system ensures awareness of the authorised collegial bodies of the Bank that make decisions that carry risks by building an effective corporate governance system, having complete, reliable and timely management information about the significant risks inherent in the Bank's activities.

Corporate Governance Code of JSC Bank CenterCredit



These principles of corporate governance of the Bank are formulated taking into account:

- The Law of the Republic of Kazakhstan 'On Joint-Stock Companies'
- The Principles of Corporate Governance of the Organisation for Economic Cooperation and Development (OECD)
- International practice in the area of corporate governance
- Other regulatory legal acts of the Republic of Kazakhstan

General Meeting of Shareholders

General Meeting of Shareholders is the Bank's supreme governing body. Shareholders exercise their right to participate in the management of the Bank by voting on items on the agenda of the General Meeting of Shareholders.

In 2024, the General Meeting of Shareholders considered a number of issues related to sustainable development, including:

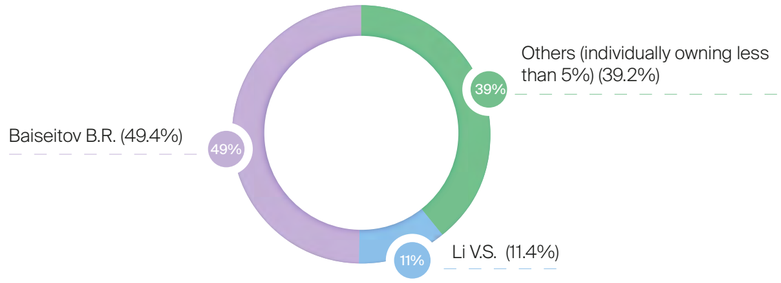
- approval of the consolidated and separate annual financial statements of JSC Bank CenterCredit for 2023;
- election of members of the Board of Directors of JSC Bank CenterCredit.

Bank's shareholders

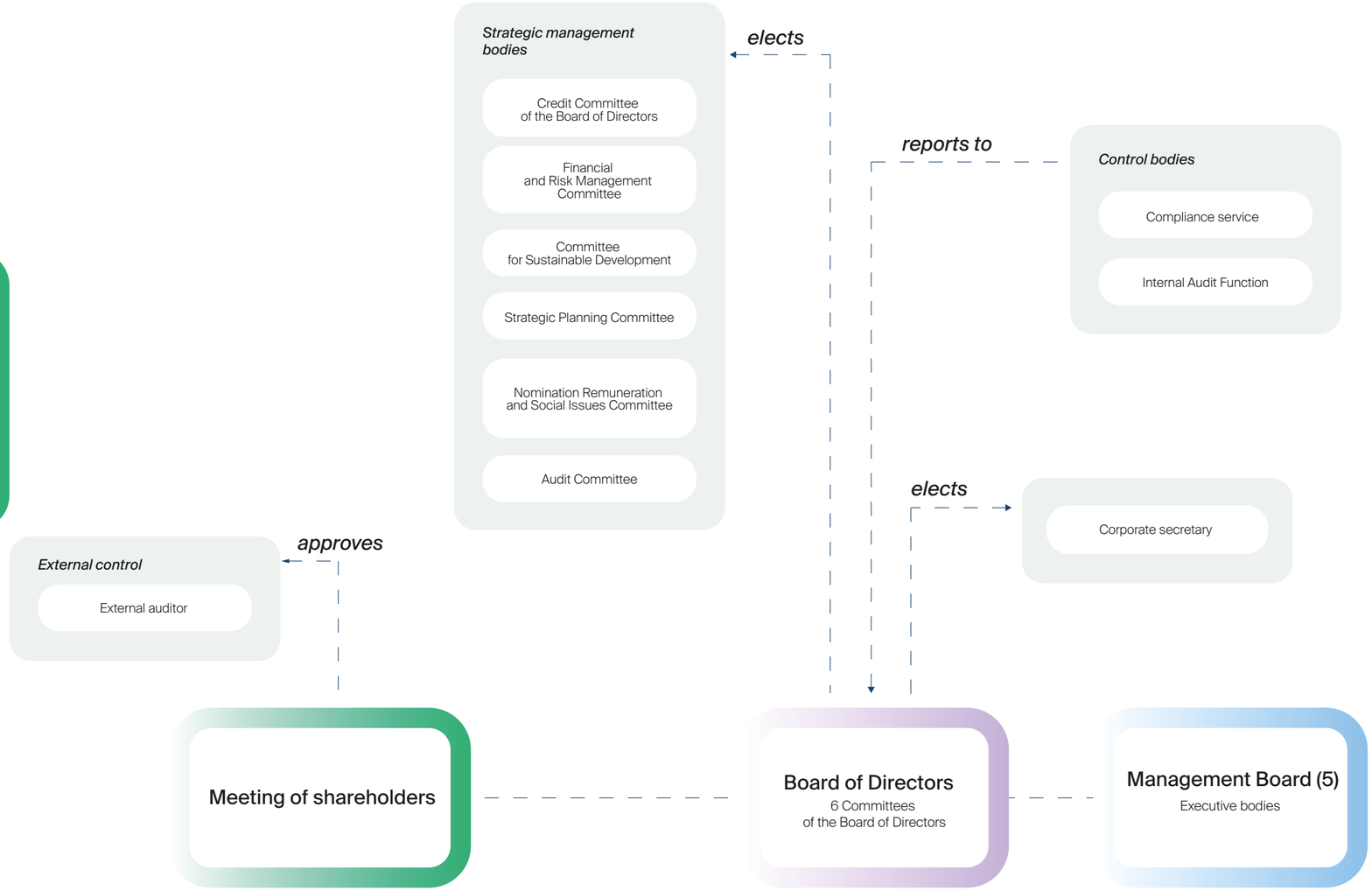
As of 1 January 2025, the number of outstanding ordinary shares amounted to 188,029,035* shares, preferred shares – 39,249,255[1] shares (of which 38,953,841[2] preferred shares were purchased by the Bank), the authorised capital was paid in the amount of 65,842 million tenge.

The structure of shareholders holding at least 5.0% of the outstanding shares (less those repurchased by the Bank) as of 1 January 2025 is set out below.

Structure of shareholders holding at least 5.0% of outstanding shares



The Bank's corporate governance structure



[1] According to the data of the register of securities holders provided by Central Securities Depository JSC
[2] According to the separate financial statements of JSC Bank CenterCredit

Board of Directors

GRI 2-9, 2-10, 2-11

The Bank's Board of Directors, elected by and accountable to shareholders, provides strategic management and control over the activities of the Bank's executive bodies: the President and the Management Board. According to the international definition, the Bank's Board of Directors is classified as a two-tier management system ("Two-Tier System Board"), consisting of the Board of Directors and the Management Board.

Members of the Board of Directors are elected through a transparent procedure that considers the diversity of shareholders' opinions, ensures that the composition of the Board of Directors meets the requirements of the law and allows for the election of independent directors. As part of the process of nominating the Board of Directors members, the diversity factor of the Board of Directors by nationality sex, ethnicity or country of origin is also taken into account.

The Corporate Governance Code stipulates that the head of an executive body cannot be elected as the Chairman of the Board of Directors. The Code also prescribes that the share of independent[3] directors should be at least 30% of the Board of Directors.

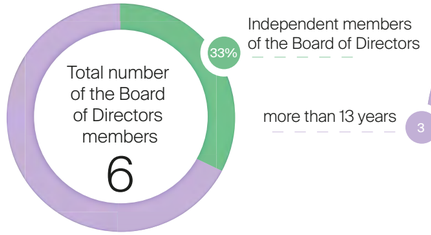
As of 31 December 2024, the Board of Directors consisted of six members. All six members of the Board of Directors of JSC Bank CenterCredit are non-executive, including two independent directors. Two members of the Board are major shareholders of the Bank, with an ownership interest of more than 5%. The Chairman is a nonexecutive Director, but is not an independent member of the Board of Directors.

In 2024, the Board of Directors held four in-person meetings and adopted 181 resolutions by absentee voting.

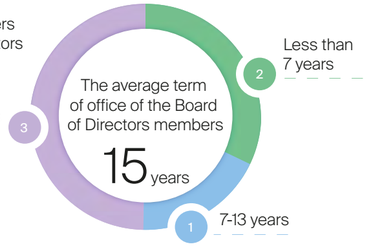
The following issues were considered: the decision to convene the annual General Meeting of Shareholders, the quantitative and personal composition of the Management Board, the list of committees under the Board of Directors and their personal composition, the election of the Chairman of the Board of Directors, the management reports of JSC Bank CenterCredit as of 1 September 2024, amendments and additions to the bank's Development Strategy until 2030, the Strategy development of the conglomerate until 2030, the Bank's draft budget for 2025 and others.

Attendance at Board meetings in 2024 was 100%. At that, in accordance with the Corporate Governance Code, the minimum quorum for holding meetings of the Board of Directors is set at 50%.

Proportion of independent directors



Number of the Board of Directors members by tenure of employment



[3] The definition of "independent director" used in this Report is consistent with the Law of the Republic of Kazakhstan "On Joint-Stock Companies" and the independence criteria set out in S&P Global Ratings methodologies for assessing the sustainable development of companies.

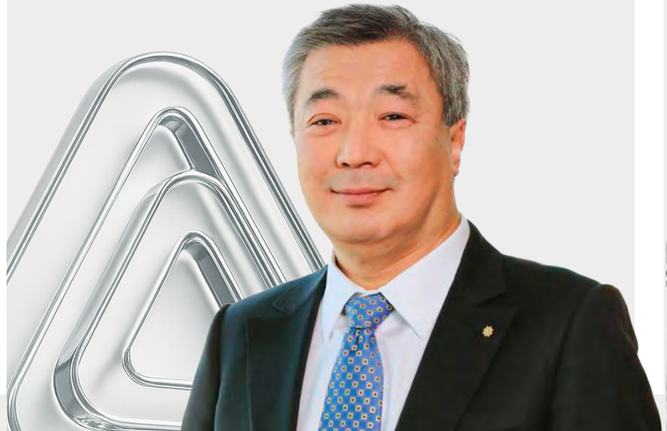
Baiseitov
Bakhytbek R.

Job title
Chairman of the Board of Directors

Date of election /re-election
26.04.2024

Duties
- Banking
- Finance
- Strategic development

Positions
- 1996 – until now: President of the Association of Banks of Kazakhstan
- 1997 – until now: Chairman of the Board of Directors of JSC Bank CenterCredit
- 2003 – until now: Chairman of the Board of Directors of BCC Invest JSC
- 2020 – until now: Chairman of the Business Council of the Financial and Banking Association of Euro-Asian Cooperation (FBA EAC)
- 2023 – until now: Chairman of the Board of Directors of Sinoasia B&R Insurance Company JSC (Sinoasia B&R)



Li
Vladislav S.

Job title
Member of the Board of Directors

Date of election /re-election
26.04.2024

Duties
- Banking
- Finance
- Strategic development

Positions
- 2000 – until now: Member of the Board of Directors of JSC Bank CenterCredit
- 2018 – until now: Independent member of the Board of Directors of KBTU JSC



Amankulov
Jumageldi R.

Job title
Member of the Board of Directors

Date of election /re-election
26.04.2024

Duties
- Banking
- Finance
- Corporate governance

Positions
- 1991-1997 – Branch Director, Deputy Chairman of the Management Board, Chairman of the Management Board of KCAB Centerbank
- 2004 – until now: Member of the Board of Directors of JSC Bank CenterCredit
- 2005-2017 Member of the Board of Directors, JSC BCC Invest



Werner Frans
Jozef Claes

Job title
Member of the Board of Directors – Independent Director

Date of election /re-election
26.04.2024

Duties
- ESG and sustainable development
- Accounting and auditing
- Finance

Positions
- 2008 – until now: President of Global Financial Consulting
- 2010 – until now: Senior Consultant at International Financial Consulting Ltd
- 2011 – until now: Member of the Board of Directors, Independent Director of JSC Bank CenterCredit
- 2017-2023: Member of the Board of Directors of Bank Uralsib PJSC
- 2019 – until now: Member of the Board of Directors of AccessBank CJSC
- 2022 – until now: Independent member of the Supervisory Board of JSC Bank Eskhata
- 29.08.2024 – 30.11.2024 – Member of the Board of Directors - Independent Director of BCC Life Insurance Company JSC



Saidenov
Anvar G.

Job title
Member of the Board of Directors – Independent Director

Date of election /re-election
26.04.2024

Duties
- Finance
- Strategic development
- Risk management

Positions
- 2018 – until now: Member of the Board of Directors, Independent Director of Home Credit Bank JSC subsidiary bank
- 2018 – until now: Member of the Board of Directors, Independent Director of Development Bank of Kazakhstan JSC
- 2019 – until now: Member of the Board of Directors, Independent Director of JSC Bank CenterCredit
- 2022-2023: Director of 50 North Capital Limited
- 2022-2023: Member of the Board of Directors of Unicorn Holdings Limited JSC
- January 2024 – May 2024 – Member of the Board of Directors, Independent Director of Bereke Bank JSC



Shayakhmetov
Daniyar N.

Job title
Member of the Board of Directors

Date of election /re-election
26.04.2024

Duties
- Strategic development
- Finance

Positions
- 2021 – until now – Member of the Board of Directors of BCC Invest JSC
- 2021 – until now – Chairman of the Management Board of BCC Invest JSC
- 2024 – until now: Member of the Board of Directors of JSC Bank CenterCredit



Performance assessment of the Board of Directors

GRI 2-18, 2-20

According to the Regulation on Performance Evaluation of the Board of Directors of JSC Bank CenterCredit[4], the Board performs an assessment using one of the following methods:

- Independently managed by the Board of Directors on an annual basis
- With the involvement of consultants, professional associations and organisations that assign corporate governance ratings

In 2024, the performance of the Board of Directors was evaluated based on the results of 2023, using a self-assessment method through a questionnaire, the results of which were submitted for consideration to the General Meeting of Shareholders of the Bank, held on 26 April 2024.

Members of the Board of Directors are re-elected if an item is included in the agenda at the General Meeting of Shareholders. In 2023 and 2024, the Board members were re-elected on an annual basis, this is reported to the KASE stock exchange and also published on the Bank's website.

Committees under the Board of Directors

GRI 2-9

Special committees have been set up under the Bank's Board of Directors in order to improve efficiency and work more thoroughly in certain areas of the Bank's activities. As of 31 December 2024, the Bank had six committees in operation:

- Audit Committee
- Financial and Risk Management Committee
- Strategic Planning Committee
- Credit Committee of the Board of Directors
- Nomination, Remuneration and Social Issues Committee
- Committee for Sustainable Development

At that, according to the Corporate Governance Code, Audit, Strategic Planning and Nomination, Remuneration and Social Issues committees should be headed only by independent members of the Board of Directors.

Audit Committee

GRI 2-18, 2-20

The main purpose of the Audit Committee's activities is a preliminary comprehensive study of the issues within its competence, preparation of recommendations for the Board of Directors to make informed and balanced decisions.

Tasks:

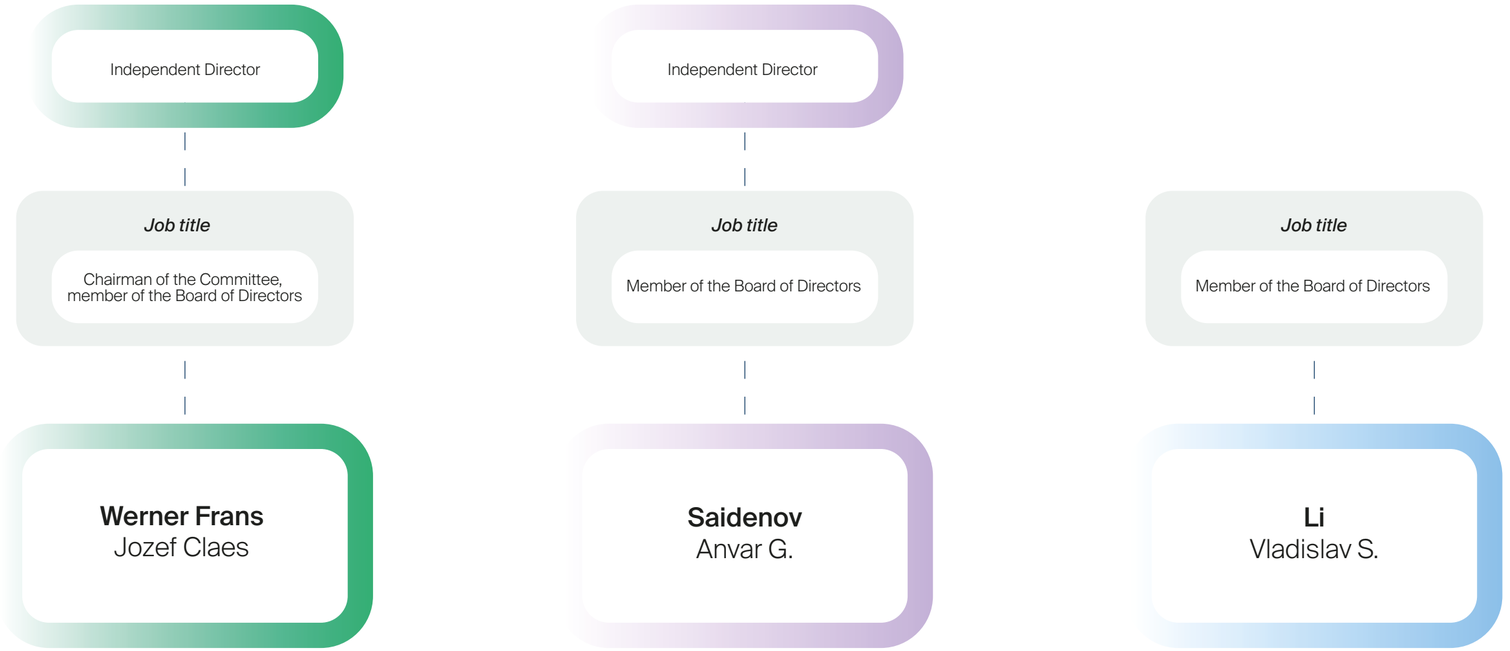
- Ensuring the development of audit and internal control policies
- Interacting with the external auditor and control of audit reports
- Ensuring the development of a policy for attracting an external auditor and paying for their services
- Approval of internal audit plans and results
- Risk management and internal audit in the Bank

As of 31 December 2024, the committee consisted of three persons, two of which were independent directors, including Werner Frans Jozef Claes, the Chairman of the committee.

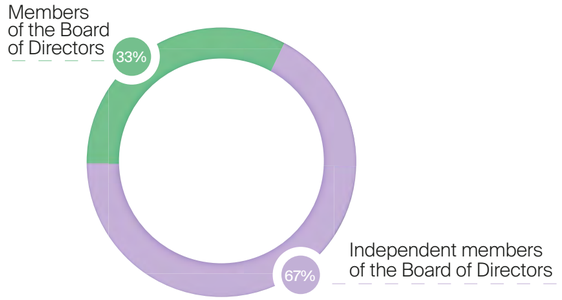
In 2024, the Audit Committee held four meetings, one of which was held in absentia. 12 issues were considered, of which:

- Six questions on the review of reports:
- On the activities of the IAS (quarterly), including the results and recommendations of the audit on the effectiveness of internal control and risk management systems
- Annual financial statements of the Bank with the KPMG auditors' opinion
- One issue on the review of the annual internal audit plan for 2024
- One issue related to the Bank's external audit activities (Deloitte, assessment of the information security management system)
- Four questions on the current activities of the IAS (approval of changes to the internal regulatory documents, maturity assessment, personnel issues, and others)

Composition of the Audit Committee



Proportion of independent directors in the Audit Committee



Financial and Risk Management Committee

The Financial and Risk Management Committee under the Board of Directors of JSC Bank CenterCredit (the "Committee") is an authorised body established to consider key issues and prepare recommendations to the Board of Directors in the area of asset, liability and capital management, as well as to improve the Bank's risk management system.

The Committee operates in accordance with the legislation of the Republic of Kazakhstan, regulatory legal acts and recommendations of the National Bank of the Republic of Kazakhstan, the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, the Bank's Charter, Risk Management Policies and other internal regulatory documents of the Bank.

Tasks:

- Managing assets and liabilities
- Risk management (market, credit, operational, interest rate, liquidity, non-financial and other financial risks)
- Managing the current interest rate policy

The Committee also participates in the improvement of the internal control system by reviewing and approving internal regulatory documents governing asset and liability management processes. In the area of risk management, the Committee evaluates the quality and effectiveness of the risk management and internal control system aimed at protecting the Bank and its reputation.

As of 31 December 2024, the committee consisted of seven members, four of whom were members of the Management Board. Anvar Saidenov, the Chairman of the Financial and Risk Management Committee, is the only independent director in the committee.

In 2024, the Financial and Risk Management Committee held 12 regular and 23 extraordinary meetings, and adopted about three hundred decisions.

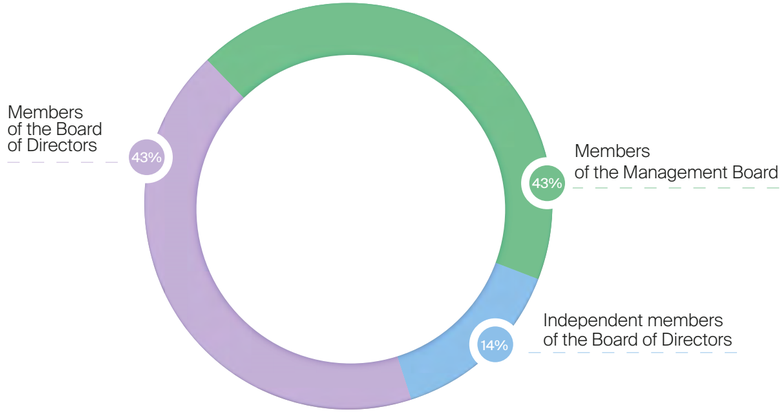
The Committee reviewed and made relevant and timely decisions on the Bank's activities in terms of:

- Management of the structure of assets, liabilities and capital
- Management of the current interest rate policy
- Setting interest rates on credit and deposit products for retail and business customers
- Risk management (market, credit, operational, interest rate, liquidity, non-financial and other financial risks)
- Compliance with prudential and other regulatory standards, internal limits
- Analysis of financial markets, competitive environment, and the banking sector of the Republic of Kazakhstan, etc.

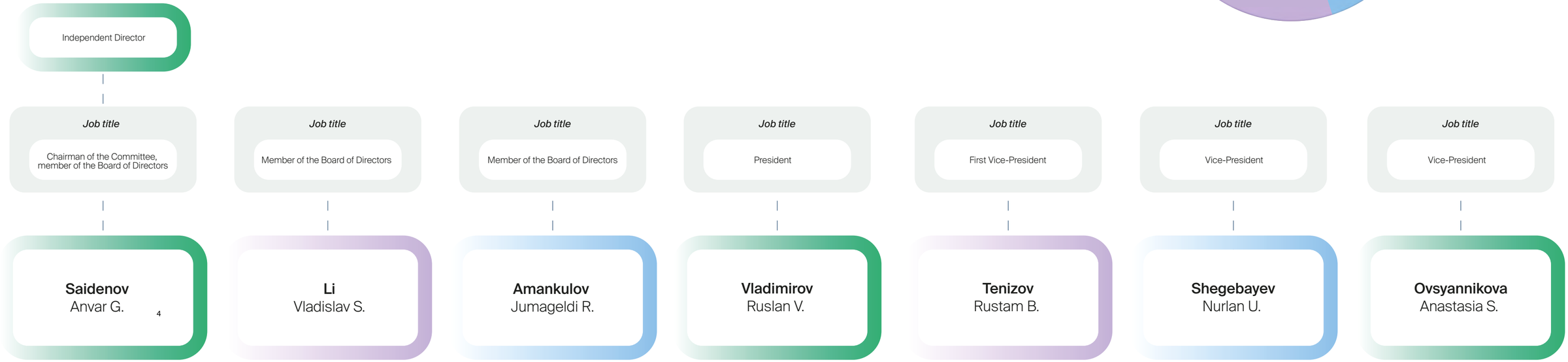
The effectiveness of the decisions made ensured further improvement of financial and business indicators:

- Increased profitability of banking operations
- Increased profitability and capital adequacy indicators
- Improved asset diversification and business sustainability
- Increased attractiveness of banking products for customers and others

Proportion of independent directors and the Management Board members in the Financial and Risk Management Committee



Composition of the Financial and Risk Management Committee



[4] Has a certificate of Harvard Business School, Risk Management for Corporate Leaders

Strategic Planning Committee

The Strategic Planning Committee was established to consider issues related to the Bank's Development Strategy and prepare recommendations to the Board of Directors regarding the formation, updating and implementation of the Bank's Development Strategy.

Tasks:

- Formation and regular updating of the Bank's Development Strategy
- Monitoring of Strategy implementation and assessment of compliance with legislation and market situation
- Budget formation and control
- Profitability management
- Analysis of the achievement of the bank's goals

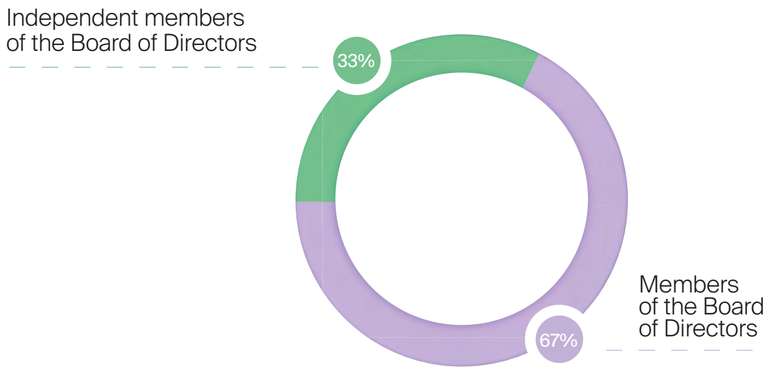
As of 31 December 2024, the Committee consisted of 3 people, Anvar G. Saidenov, an independent director, was the chairman of the committee.

The tasks, functions, and procedure for meetings and decision-making of the Committee are reflected in the "Regulations on the Strategic Planning Committee under the Board of Directors", approved as amended by Resolution of the Board of Directors No. 0403/3 dated 03.04.2024.

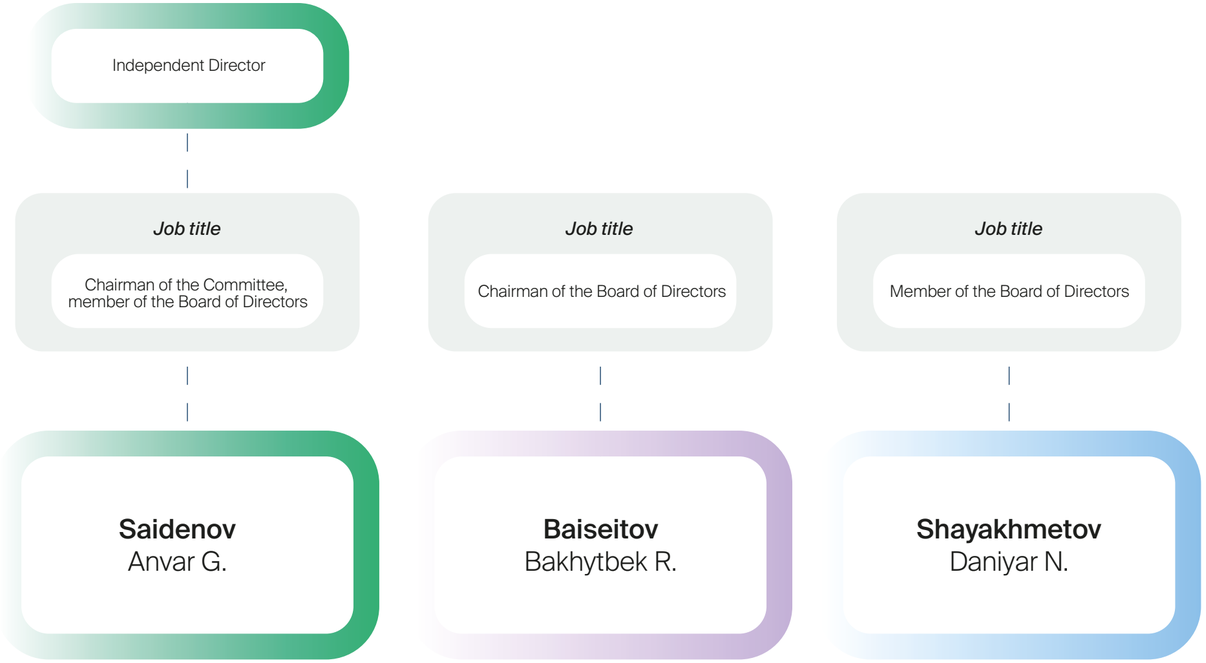
In 2024, the Strategic Planning Committee held 5 meetings, at which the following issues were considered:

- Reports on the financial performance of JSC Bank CenterCredit
- A brief analysis of the Bank's profitability situation
- Reports on the implementation of the Development Strategy of JSC Bank CenterCredit
- Amendments and additions to the "Regulations on the Strategic Planning Committee under the Board of Directors"
- Budget (business plan) of JSC Bank CenterCredit for 2025
- The work plan of the Strategic Planning Committee for 2025

The share of independent directors in the composition of the Strategic Planning Committee



Composition of the Strategic Planning Committee



Credit Committee

The Credit Committee of the Board of Directors is a permanent collegial body of the Bank under the Board of Directors that implements the Bank's internal credit policy and is authorised to make decisions in accordance with the Regulations on the Credit Committee of the Board of Directors.

Tasks:

- Implementation of the Bank's internal credit policy
- The Committee is authorised to consider project issues in accordance with the Regulations on the Limits of Decision-making Authority related to Credit Risk.

Resolution of the Board of Directors No. 3-0122-02 dated 22.01.2019 approved the Regulation on the Credit Committee of the Board of Directors. The latest amendments to the Regulations on the Credit Committee of the Board of Directors were approved by Resolution of the Board of Directors No. 1104/1 dated 04.11.2024.

The Committee consists of 10 members from among the Members of the Board of Directors and experts with the required professional knowledge.

In 2024, the Credit Committee of the Board of Directors held 50 regular and 31 extraordinary meetings, where 228 issues were considered.

Composition of the Credit Committee



Nomination Remuneration and Social Issues Committee

The Board of Directors' Nomination Remuneration and Social Issues Committee is a permanent collegial body of the Bank under the Board of Directors. The Committee deals with appointments, remuneration, and social aspects.

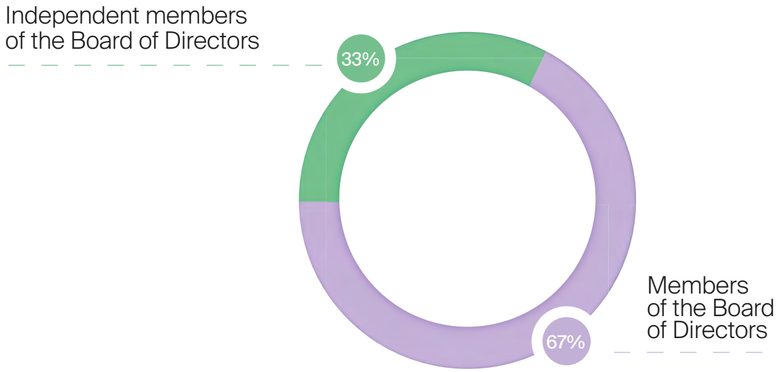
Tasks:

- Nomination of candidates for senior positions
- Approval of branch directors
- Recommendations on remuneration of top management
- Monitoring compliance with the Corporate Code
- Evaluation of the implementation of Personnel Policy
- Approval of the Bank's organisational structure
- Review of the conflict of interest management procedure

Resolution of the Board of Directors No. 3-1001-02 dated 01.10.2020 approved the Nomination Remuneration and Social Issues Committee. The latest amendments to the Regulations on the Nomination Remuneration and Social Issues Committee were approved by Resolution of the Board of Directors No. 1028/1 dated 28.10.2024.

As of 31 December 2024, the committee consisted of three persons, two of which were independent directors, including Werner Frans Jozef Claes, the Chairman of the committee.

Share of independent directors in the composition of the Nomination Remuneration and Social Issues Committee



In the reporting year, the Committee held 8 meetings, which considered the following issues:

- On the performance of the KPI of the Members of the Management Board, Corporate Secretary, Chief Compliance Officer for 2023
- On the composition of the Management Board of JSC Bank CenterCredit
- On remuneration issues based on the results of work in 2023
- On amendments and additions to the organisational structure of JSC Bank CenterCredit
- On approval of the new edition of the Personnel Policy of JSC Bank CenterCredit
- On approval of the Committee's work plan for 2025

Composition of the Nomination Remuneration and Social Issues Committee



Committee for Sustainable Development

The Committee was established based on the decision of the Board of Directors dated 20 September 2023 to provide recommendations to the Board of Directors on decision-making issues related to the Bank's sustainable development.

Tasks:

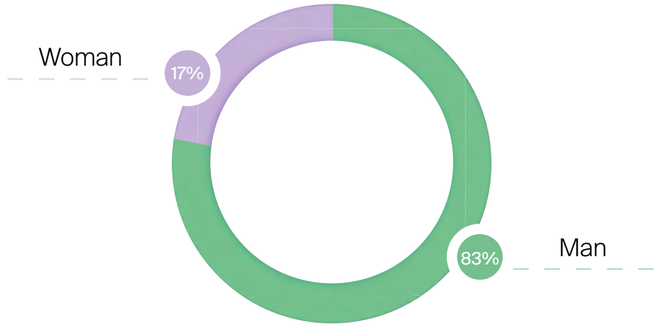
- Setting sustainable development goals
- Monitoring and correcting the achievement of ESG goals
- Monitoring the implementation of the ESG strategy
- Monitoring the implementation of the climate strategy
- Ensuring the development of projects, including green initiatives
- Evaluation of results and formation of recommendations in the area of sustainable development
- Effective control of related processes

As of 31 December 2024, the Committee consisted of 6 people, Werner Frans Jozef Claes, an independent director, was the chairman of the committee.

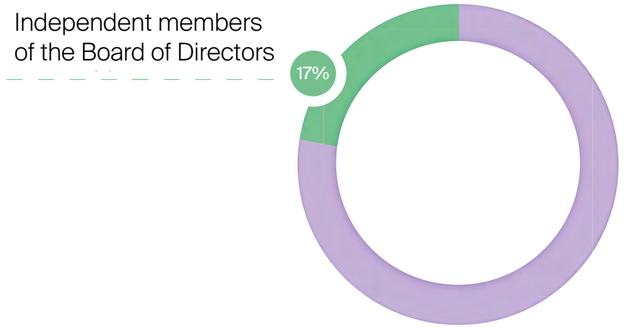
In 2024, the Committee for Sustainable Development held two meetings at which the following issues were considered:

- Approval of the verified Report on the Bank's Sustainable Development
- Approval of the Bank's climate strategy and climate stress testing results
- Regarding the Sustainable Development Plans (ESG) for 2025
- On the approval of the Roadmap for green bonds
- Appointment of a new Secretary of the Committee for Sustainable Development under the Board of Directors

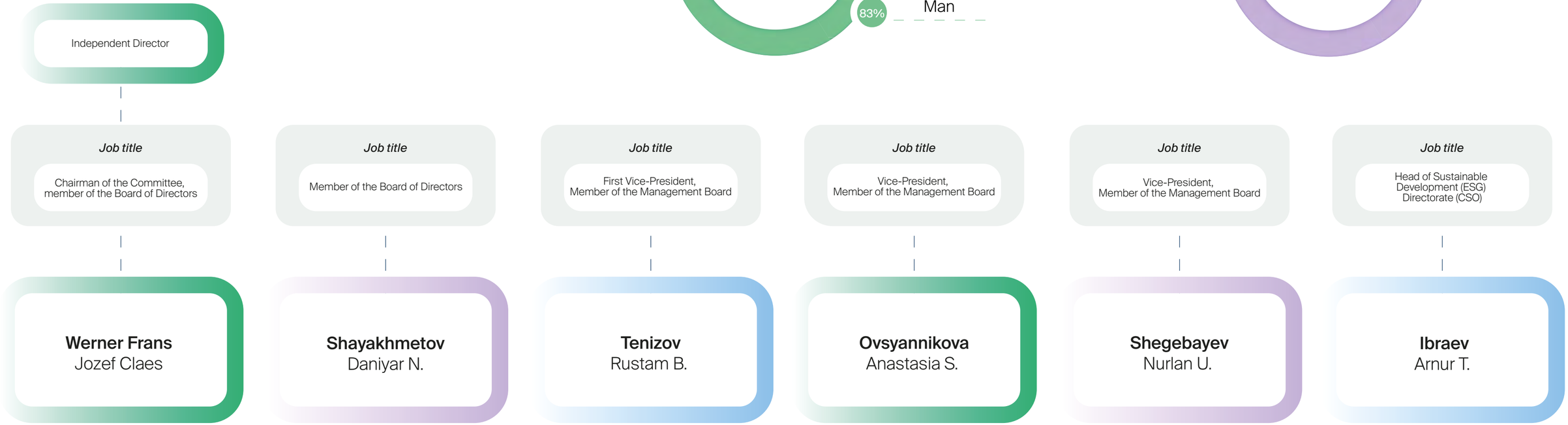
Gender structure of the members of the Sustainability Committee



Proportion of independent directors in the Sustainability Committee



Composition of the Committee for Sustainable Development



Management Board

GRI 405-1

The Management Board is the Bank's collegial executive body and manages the Bank's day-to-day operations in accordance with the chosen business model, scale of operations, types and complexity of operations, risk profile, and internal documents approved by the Bank's Board of Directors.

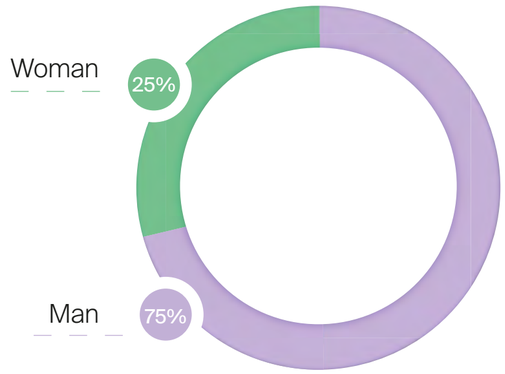
The Management Board manages the Bank's activities in such a way as to ensure the protection of the interests of shareholders and the possibility of developing the Bank itself.

To achieve these goals, the Management Board primarily solves the following tasks:

- It is responsible for the daily work of the Bank and its compliance with the Bank's budget,
- Faithfully, timely and effectively executes decisions of the General Meeting of Shareholders and the Board of Directors.

In the reporting year, the Bank's Management Board held 87 in-person meetings of the Management Board, at which 900 issues related to the Bank's core business were considered, including issues related to management reporting, business development and support, procedural banking issues, decisions of committees and commissions were approved, and others.

Gender structure of the members of the Management Board



Payment of remuneration to members of the Bank's Board of Directors and Management Board

GRI 2-19, 2-20, 2-21

Remuneration is paid in accordance with the Policy on Remuneration, Accrual of Monetary Remuneration, as well as other types of material incentives to senior employees of JSC Bank CenterCredit and persons accountable to the Board of Directors of JSC Bank CenterCredit, approved by the Resolution No. 3-0121-02 of the Board of Directors of JSC Bank CenterCredit dated 21 January 2019.

The Bank's executive compensation policy is based on the principles of fairness, competitiveness and compliance with the contribution of each manager to the Bank's activities and development. The remuneration structure includes fixed and variable components.

The amount of remuneration is determined on the basis of competencies, skills and market value, as well as the contribution of the senior employee to the implementation of the Bank's strategy, the efficiency of the organisation of work, the implementation of business plans and the management of structural divisions.

Composition of the Management Board

Vladimirov
Ruslan V.

Name title

President of the Bank



Tenizov
Rustam B.

Name title

First Vice-President,
Member of the Management Board



Ovsyannikova
Anastasia S.

Name title

First Vice-President,
Member of the Management Board



Shegebayev
Nurlan U.

Name title

First Vice-President,
Member of the Management Board



Payment of variable remuneration to senior employees of the Bank is made in the amount of no more than 50% of a certain amount of variable remuneration and depends on the achievement of established goals and performance.

The suspended part of this remuneration is paid in equal shares for a minimum of three years, provided that there are no losses and the manager continues to work in the Bank. Part of the variable remuneration may be paid in the form of shares of the Bank provided that they are held for a period of at least three years.

The Bank does not provide bonuses for appointment to a position, incentive payments for hiring, compensation for dismissal or pension benefits.

Remuneration is closely linked to performance and risk management. Goals for senior employees are set in accordance with the Bank's strategy and are evaluated taking into account the requirements of the Program for Improving the Financial Stability of the Banking Sector of the Republic of Kazakhstan and regulatory legal acts of the regulator.

The Bank strives to ensure that the remuneration system promotes long-term development and sustainability, as well as reflects responsible management of the impact on the economy, environment and society. The results of the Company's activities in relation to managing the Company's impact on the economy, the environment and society are taken into account through the implementation of KPIs for senior management in ESG.

The amount of fixed remuneration for members of the Bank's Board of Directors for fiscal year 2024 does not exceed 5% of the Bank's salary fund and amounts to 1.2%.

In the reporting year, members of the Board of Directors and the Management Board are entitled to the following types of remuneration:

- Members of the Board of Directors – monthly remuneration for individual performance indicators
- Members of the Management Board – guaranteed official salary, remuneration based on the results of work for the year

The total amount of remuneration for members of the Board of Directors and the Management Board for 2024 was KZT 1,323.6 million tenge or 2.7% of the Bank's salary fund.

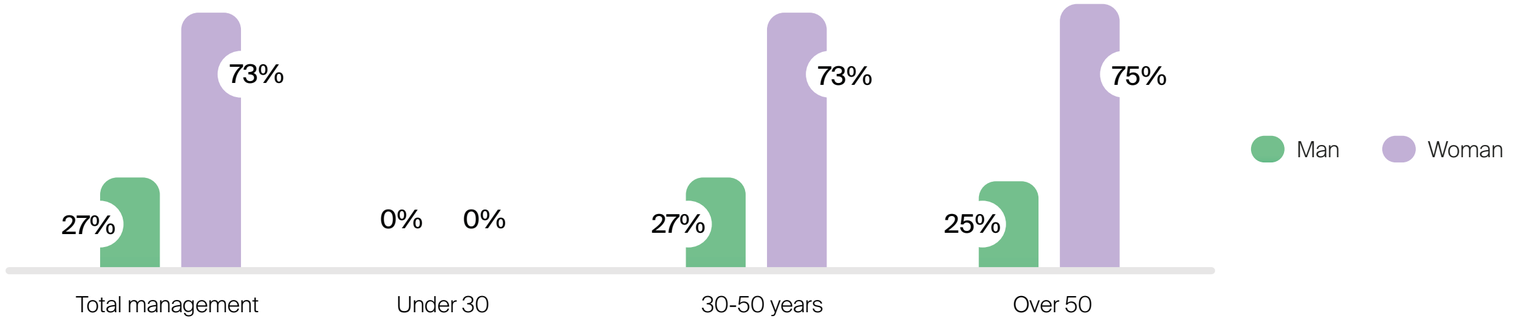
Diversity of governing bodies

GRI 405-1 (a)

The Governing Body is a formalised group of persons responsible for the Bank's strategic management, effective control over the management's activities, and accountability to the Bank as a whole and its stakeholders. The Bank's management includes: members of the Board of Directors, members of the Management Board and Vice-Presidents. At the end of 2024, the Bank's senior management consisted of 15 people, of whom four were women and 11 were men, representing 27% and 73%, respectively. The age structure of senior management is presented as follows: 11 people in the category from 30 to 50, and four people over 50 years old.

For more detailed information on the gender and age structure of the Bank's senior management, see Annex F.

Percentage share of senior management of JSC Bank CenterCredit



The Bank's dividend policy

The rights of shareholders to receive dividends and the procedure for their payment are stipulated in the Bank's Charter, approved by the resolution of the Bank's Board of Directors.

The dividend policy is based on balancing the interests of JSC Bank CenterCredit and its shareholders in determining the amount of dividend payments, increasing the investment attractiveness, financial stability, capitalisation and liquidity of the bank, ensuring market returns on invested capital, respecting and strictly observing the rights of shareholders and improving their welfare.

It is the responsibility of the General Meeting of Shareholders of JSC Bank CenterCredit to make a decision on the payment of dividends on shares and approve the amount of the dividend based on the results of the year per ordinary share.

For preferred shares, in accordance with the charter of JSC Bank CenterCredit and the share issue prospectus, a guaranteed dividend amount is established, which is calculated as the base rate of the National Bank of the Republic of Kazakhstan plus 3.5% per annum with threshold restrictions from 12 to 14% per annum[5] .

Earnings for 2024 per share in accordance with the consolidated financial statements amounted to KZT 1085.13.

According to the data of Kazakhstan Stock Exchange JSC, the market value of one ordinary share of JSC Bank CenterCredit (NIN KZ1C36280010) as of 31.12.2024 amounted to 2,186.99 tenge.

Expenses of the Bank on payment of dividends, KZT thousand

Name	2022	2023	2024
On preferred shares	12,397	12,328	12,359
On ordinary shares	-	-	-
Total	**12,397**	**12,328**	**12,359**

List of internal regulatory documents approved by corporate governance bodies in the reporting period

During the past reporting period, the Bank has been actively working on the development and optimisation of the system of internal regulatory documents, ensuring the optimisation of risk management processes and improving the quality of corporate governance.

Among other things, internal regulatory documents have been developed or changes have been made to key documents regulating aspects of risk management, information security, and human rights. The Bank's Climate Strategy was approved at the Board of Directors level. In terms of sustainable development management, a Regulation for the procedure when preparing this report was approved.

- Information Security Policy of JSC Bank CenterCredit
- Operational Risk Management Policy of JSC Bank CenterCredit
- Stress Testing Policy of JSC Bank CenterCredit
- Personal Data Management and Protection Policy of JSC Bank CenterCredit
- Risk and Capital Management Policy Policy of JSC Bank CenterCredit
- Human Rights Policy
- Reputational Risk Management Policy of JSC Bank CenterCredit
- Information Technology and Information Security Risk Management Policy of JSC Bank CenterCredit
- Climate Strategy of JSC Bank CenterCredit
- Regulation on the procedure for preparing a Sustainability Report

[5] By Resolution No. 21 of the Management Board of the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market dated 27 April 2023, the conditions for profit distribution, accrual of dividends on common and/or preferred shares and/or perpetual financial instruments, as well as the procedure for the repurchase of own shares by a second-tier bank, were approved for cases where funds from the state budget, the National Fund of the Republic of Kazakhstan, the National Bank of the Republic of Kazakhstan and/or its subsidiaries are used to ensure the financial stability and/or recovery of such bank (the "Regulatory Legal Act"). Taking into account that Bank CenterCredit has been a participant in the Program for Enhancing the Financial Stability of the Banking Sector of the Republic of Kazakhstan since 2017, the payment of dividends on Bank CenterCredit's preferred shares for 2023 was carried out in accordance with the conditions specified in the Regulatory Legal Act.

Sustainable development management

GRI 2-9, 2-12, 2-13, 2-14, 2-17, 2-22, 2-23, 2-24, 2-29, 3-3, S1 27 (a,b), IFRS S1, IFRS S2

Message from the Chairman of the Committee for Sustainable Development under the Board of Directors

2024 has become a landmark stage in our movement towards sustainable development. We have taken a significant step forward by issuing the first Sustainability Report of the Bank according to international standards, following the best practices in the financial market. Reaffirming our commitment to environmental sustainability and social responsibility, we have adopted an ambitious Climate Strategy and deeply integrated ESG standards into all aspects of our operations.

These measures have allowed us to achieve significant success: for the first time, the Bank has received the highest rating among financial institutions in Kazakhstan in the S&P Global Corporate Sustainability Assessment. The assessment is a clear indication of the seriousness of our initiatives and strengthens the confidence of our clients and partners in the correctness of our chosen course of sustainable development.



We have implemented the initiatives of the roadmap for managing ESG aspects ahead of schedule, defined as part of the overall corporate development strategy until 2025. In 2024, the Bank adopted an updated Development Strategy until 2030, one of the key aspects of which was the integration of ESG principles into the overall concept of long-term growth. As part of the adopted Development Strategy of the banking conglomerate JSC Bank CenterCredit until 2030, a separate ESG strategy of the group was prepared. In October 2024, the Bank's Board of Directors approved the Climate Strategy of JSC Bank CenterCredit. We are proud to be the first bank in the region to develop and implement a Climate Strategy. We intend to actively develop climate initiatives, conduct regular monitoring of their impact and ensure full information disclosure in cooperation with stakeholders.

At the beginning of 2025, the decision of the Committee for Sustainable Development under the Board of Directors approved a Roadmap for the implementation of strategic ESG goals, which assigns specific initiatives in sustainable development to the responsible departments of the bank.

We understand the importance of continuous and consistent promotion of the principles of sustainable development. Regulators are making new demands, and the expectations of stakeholders are constantly evolving. Therefore, our task is to remain sensitive to changes in the external environment and adapt to them by consistently implementing initiatives that contribute to achieving long-term sustainable growth goals.

The Bank's sustainable development implies continuous improvement of corporate processes, the main focus of which is on the needs and opinions of stakeholders. An open dialogue, strengthening of the risk management system and implementation of the best international and national practices help the Bank to respond in a timely manner to changes in expectations of various groups of stakeholders.

Last year, the Bank set the goal of undergoing an active ESG transformation of its operations, aimed not only at compliance with regulatory requirements, but also at integrating modern approaches in corporate governance, environmental protection and social responsibility. Following this vector, we are successfully fulfilling our plans and setting even more ambitious goals for the implementation of best practices in corporate governance, social responsibility and respect for the environment.

Chairman of the Committee for Sustainable Development, Independent Director

Mr. Werner Claes

Key documents regulating aspects of sustainable development:

- Sustainability Policy of JSC Bank CenterCredit
- Responsible Financing Policy of JSC Bank CenterCredit
- Human Rights Policy of JSC Bank CenterCredit
- Regulation on the Committee for Sustainable Development under the Board of Directors of Bank

Since 2023, a Committee for Sustainable Development under the Board of Directors, an authorised collegial body, has been operating in the Bank to make strategic decisions in the area of ESG. The Committee is a consultative and advisory body of the Board of Directors and provides recommendations to the Board of Directors on decision-making issues related to the Bank's sustainable development.

The Chairman and members of the Committee are approved by the Bank's Board of Directors, taking into account the requirements of the appropriate qualifications and gender balance. The Committee is headed by Mr. Werner Claes, an independent director, who has expertise in ESG and climate risk management.

The Committee also includes a member of the Board of Directors, members of the Management Board, and a Head in charge of sustainable development issues.

The Committee's functions include providing recommendations to the Board of Directors on decision-making related to the Bank's sustainable development, overseeing the development and implementation of the ESG strategy, as well as developing projects and initiatives in sustainable development.

In 2024, two meetings of the Committee for Sustainable Development under the Board of Directors were held. Among the issues considered by the Committee there were:

- Approval of the verified Report on the Bank's Sustainable Development
- Approval of the Bank's climate strategy and climate stress testing results
- Approval of the Roadmap for green bonds

At the beginning of 2023, the Bank established the Directorate for Sustainable Development (ESG). The main tasks of the Directorate are: implementation of the principles of sustainable development, monitoring the implementation of tactical initiatives in sustainable development, development and control over the implementation of strategic ESG KPIs, including the goals of the climate strategy, interaction with international financial institutions and national regulators, interaction with internal and external stakeholders on various aspects of sustainable development, ensuring disclosure of non-financial information. information on sustainable development. In 2024, the Chief Sustainability Officer (CSO) management staffing position was established. The CSO is responsible for organising and coordinating activities aimed at ensuring the Bank's compliance with the principles of Sustainable Development (ESG).

Arnur Ibrayev, CSO, Head of the Directorate for Sustainable Development (ESG), is qualified in sustainable development management and corporate social responsibility.

Mr. Werner Claes, the Chairman of the Committee, has the following certifications:
- ESG Certificate issued by the Corporate Governance Institute
- the SCR® Certificate in sustainable and climate risks under the program of the Global Association of Risk Professionals (GARP)

Arnur Ibrayev, CSO, holds:
- Certificate in Sustainability Management (Sustainability Leadership and Corporate Responsibility, London Business School)

Sustainability management system

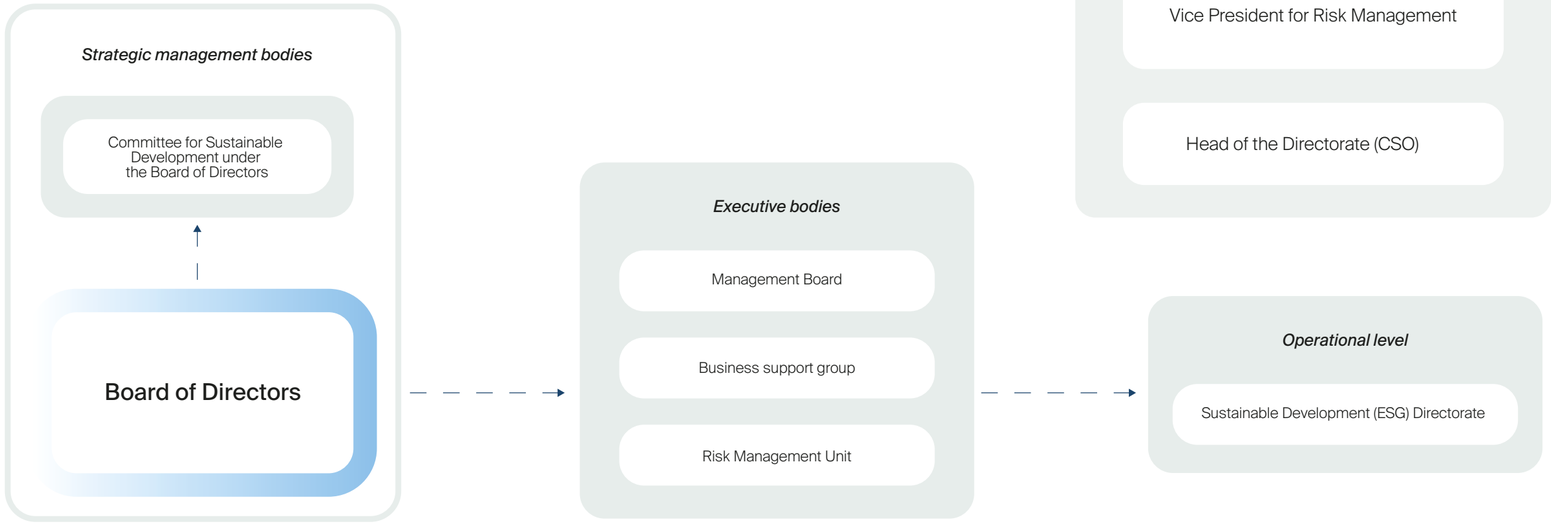
GRI 2-9, 2-12, 2-13, 2-14, IFRS S1

Role of the Board of Directors and Committees in managing sustainable development

The Board of Directors determines the key priorities, goals and fundamental principles of the Bank's strategic development in the area of sustainable development, as well as methods for integrating them into the overall development strategy. This includes approving key performance indicators (KPIs) to measure the achievement of strategic ESG goals and ensuring that they are monitored. The Board also approves top-level internal regulatory documents in sustainability reporting.

The Board of Directors' Committee for Sustainable Development, acting as an advisory and negotiating body to the Board of Directors, plays an important role in providing advice to the Board on issues related to the Bank's sustainable development. Established in 2023, this Committee oversees the development and implementation of the ESG and the climate strategy, as well as takes into account and assesses climate risks and opportunities. The Committee not only approves internal regulatory documents and reports in the area of sustainable development for further approval by the Board of Directors, but also ensures coordination on sustainable development issues with other committees under the Board of Directors, thereby contributing to an integrated approach to managing all aspects of sustainable development in the Bank.

Structure of management of sustainable development aspects in the Bank



The role of executive bodies and operational units in managing sustainable development



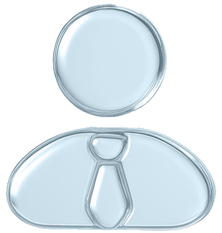
The Management Board

ensures the implementation of the Bank's sustainable development strategy and compliance with procedures, processes and policies approved by the Bank's Board of Directors. The Management Board monitors the implementation of the action plan for achieving the Bank's strategic goals in the area of sustainable development.



The risk management unit

determines the materiality of risks associated with ESG aspects and provides recommendations for decision-making based on the results of the risk assessment, participates in the development of assessment tools, conducts climate stress testing procedures and generates reports in accordance with specified standards.



Chief Sustainability Officer (CSO)

) is a member of the Board of Directors' Committee for Sustainable Development. The CSO is responsible for organising and coordinating activities aimed at ensuring the Bank's compliance with the principles of Sustainable Development (ESG), is the head of the Directorate for Sustainable Development (ESG), and also provides communication with the heads of all structural divisions of the Bank for the successful implementation of the sustainable development strategy.



Sustainable Development (ESG) Directorate

is the main coordinating structural unit of the Bank, which provides expert support to other divisions of the Bank in the field of sustainable development, manages the implementation of the action plan to achieve the Bank's strategic goals in the field of ESG, monitors and reports on this area.

Sustainable development strategy

GRI 2-22, 3-3

The main objective of the Bank's sustainable development activities is to integrate ESG aspects into the Bank's corporate long-term growth strategy in order to contribute to the growth of the national economy, preserve the environment and create added value for society in the interaction of the Bank's top management and employees with clients, the investment community, shareholders, business partners and the government.

In 2024, the Bank's Development Strategy until 2030 was approved, in which the designated Sustainable Development Goal was formally consolidated. The ESG strategy within the framework of the Bank's Development Strategy defines the Bank's Climate Strategy and ESG goals beyond the climate strategy.

Environmental goals include reducing fuel and energy consumption in their own offices, increasing the volume of waste collected separately, as well as goals for the development of an environmental (including climate) and social risk management system.

Socio-economic goals include the introduction of the work-life balance concept, targets for the volume of social investments, to increase client and partner loyalty in data protection issues, and to increase awareness in ESG.

Management objectives include the introduction of AI to optimise the bank's business processes, increased transparency, as well as ethical leadership and cultural goals.

The climate strategy of JSC Bank CenterCredit was approved by the Bank's Board of Directors. The Climate Strategy is a public strategic document containing goals and a set of measures and initiatives to achieve carbon neutrality by the bank. Detailed information about the strategy is presented in the section "Combating climate change"

Also in 2024, the ESG Strategy of the Group was defined as part of the Development Strategy of the banking conglomerate JSC Bank CenterCredit until 2030. Strategic priorities until 2030 include scaling up green solutions at the group level, using the principles of a "closed-loop economy" in the work of companies, and transparent and ethical development of the banking conglomerate.

ESG – Employee training

One of the priorities of the ESG strategy is to systematically increase the awareness of employees about the concept of sustainable development, its main aspects and principles, as well as the mechanisms for integrating the principles of sustainable development into the daily activities of the bank.

In the reporting year, training programs were developed and supplemented on the bank's internal training portal:

- Online course on the basics of ESG, which was successfully completed by more than 75% of the Bank's employees
- more than 70% of employees completed an online course on human rights
- online course on responsible financing tools (implemented for employees involved in the loan process)

As part of the partnership with the EBRD, a series of online seminars for employees was continued.

In 2024, the following topics were covered on seminars:

- Human rights, diversity and inclusion in business
- ESG regulation in Kazakhstan

Also during the reporting period, employees of the Sustainable Development (ESG) Directorate were certified in greenhouse gas assessment, a system for verifying greenhouse gas emissions in accordance with ISO 14064.

Head of the Directorate (CSO) was trained in the Sustainability Leadership and Corporate Responsibility program, London Business School.

Offline trainings from the Central-Asian Institute of Environmental Research (CAIER) were organised for BCC managers.

The topic of the ESG training for managers was ESG risk management in the financial sector. New initiatives in ESG in the financial market of the Republic of Kazakhstan, the requirements of ARDFM in ESG, and current ESG products were discussed in detail. In addition, the seminar discussed the Bank's progress in sustainable development, best practices in the financial market, and ESG management based on new IFRS standards S1, S2.

The focus of the ESG training for the Bank's branch managers was the development of green financing, the application of the green Taxonomy of the Republic of Kazakhstan in the framework of achieving the goals of the bank's Climate Strategy. The Bank's employees involved in the integration of the principles of sustainable and responsible financing participated in offline and online training seminars. These events were organised by the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, with the support of the International Finance Corporation (IFC) and conducted by specialists from the Big Four companies, the EBRD and other expert organisations in order to raise awareness and build expertise on ESG and sustainable financing issues for participants in the banking sector of the Republic of Kazakhstan.

In addition, the Bank's employees participated in Global Compact training programs:

SDG Ambition 2023/24, 2024/25 is a six-month accelerator aimed at supporting companies participating in the UN Global Compact in setting ambitious corporate goals and accelerating the integration of the 17 Sustainable Development Goals (SDGs) into core business management. The program allows companies to go beyond gradual progress and activate transformative changes, revealing the value of the business, increasing its sustainability and ensuring long-term growth. BCC's case for achieving the ambitious goal of "100% Compliance with CFO principles for Integrated Investments and SDG Financing" was noted by the organisers and included in the SDG Ambition Case Study Playbook 2024/2025.

Climate Ambition Accelerator 2024 is a six-month accelerator program designed to equip companies with the knowledge and skills required to accelerate progress in setting science-based emission reduction targets in line with the 1.5°C trajectory, which puts them on the path to zero emissions by 2050.



Approach to stakeholder engagement

GRI 2-29

The Bank's interaction with stakeholders is based on the principles of equality, transparency and openness, and willingness to cooperate. The Bank considers any person or group of persons involved in the Bank's activities to varying degrees to be its stakeholders, who influence the Bank's results of operations and/or are influenced by the Bank's decisions and activities.

The Bank interacts with stakeholders in accordance with the AA1000SES Standard, considering the following principles:

- The principle of materiality The Bank clearly defines its stakeholders and understands which stakeholders' interests are essential.
- The principle of completeness In the course of its activities, the Bank pays attention to the concerns of stakeholders and seeks to understand their views on significant issues, needs and expected results of its activities.
- The principle of preparedness for response In carrying out its activities, the Bank consistently responds to all material questions of stakeholders.

For more systematic and effective cooperation, the Bank has identified key stakeholder groups and defined their expectations and mechanisms of interaction with them. They are fixed in a public document, the bank's Sustainable Development Policy, approved in 2023. In 2024, these ways of interaction have not changed: BCC continues to implement a range of activities, including meetings and consultations, participation in specialised forums and conferences, consideration of incoming requests through social networks, a hotline and other channels of interaction with clients and partners. The Bank has identified 11 stakeholder groups that the Bank has an impact on and they are significant to the Bank. The diagram below shows the goals and methods of the Bank's interaction with stakeholders, as well as the structural functions responsible for interaction and general contact for the group of stakeholders.

Mass media

Goal
- Expansion of access to equity and investments
- Protecting the interests of financial market participants
- Cooperation on sustainable development issues
- Promoting openness and sustainability through the media
- Strengthening the Bank's reputation

Mechanisms
- Meetings, negotiations, letters, electronic appeals
- ESG and annual report, website publications, press releases, interviews, social media, mass media

Responsible ones
- Marketing center, PR

Other financial market participants

Goal
- Access to loans and investments
- Protecting the interests of financial market participants
- Cooperation in financial sector development and sustainability

Mechanisms
- Meetings, negotiations, letters, electronic appeals
- Meetings, negotiations
- Interaction through the associations of financial institutions
- ESG and annual report, KASE information

Responsible ones
- Treasury Center
- Directorate for Sustainable Development (ESG)
- Directorate for Documentation Administration

Employees

Goal
- Communicating strategic goals and results
- Strengthening the employer's brand
- Consideration of employee needs and feedback

Mechanisms
- Direct communication with management
- Hotline, channels for reporting violations, electronic and written appeals
- Corporate events
- Financial and ESG reporting
- Engagement and climate research

Responsible ones
- Personnel Management Center
- Directorate for Sustainable Development (ESG)

State authorities and supervisory authorities

Goal
- Compliance with regulatory requirements and transparency of reporting
- Maintaining licenses and reducing risks
- Strengthening partnership with the government
- Participation in legislative initiatives
- Responsible tax behaviour

Mechanisms
- Meetings, letters, electronic appeals
- Reporting
- Checks, inquiries, and commissions
- Associations of financial institutions

Responsible ones
- Operational service center

Customers (networks and distributors) and consumers

Goal
- Informing about products and conditions
- Understanding customer needs
- Implementation of customer-oriented solutions
- Increased loyalty and quality service

Mechanisms
- Satisfaction studies, reviews
- Electronic appeals and personal interaction
- Financial and ESG reporting
- Mass media, website, social networks, contact center
- Internet/mobile banking, SMS notifications

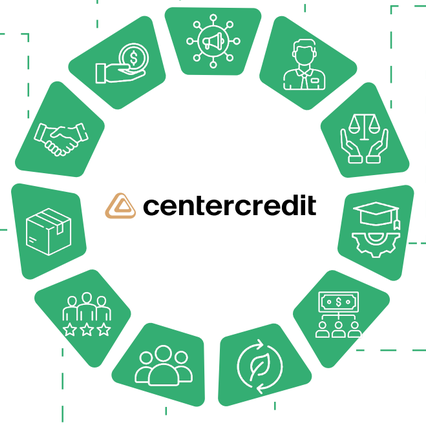
Responsible ones
- Branch Network Management Center
- The Operations Center

Suppliers

Goal
- Fulfilment of contract terms
- Timely deliveries for operational activities
- Promoting responsibility in the area of human rights and the environment

Mechanisms
- Meetings, negotiations
- Electronic and written requests
- Letters, questionnaires

Responsible ones
- Procurement organisation center



Professional community

Goal
- Implementation of ESG principles and best practices
- Training on sustainable development
- Increasing the ESG rating

Mechanisms
- Meetings, letters, electronic appeals
- ESG reporting
- External website

Responsible ones
- Directorate for Sustainable Development (ESG)

Shareholders / Investors / Borrowers

Goal
- Transparency of financial and non-financial results
- Protection of shareholders' rights
- Maintaining investment attractiveness
- Getting feedback

Mechanisms
- General meetings and personal meetings
- Electronic and written communication
- Financial and ESG reporting
- Publications on KASE, in the media and on the website

Responsible ones
- Center for planning and finance
- Corporate secretary, secretariat

Industry associations and the expert community

Goal
- Participation in ESG and climate initiatives
- Building the trust of stakeholders

Mechanisms
- Meetings, letters, electronic appeals
- ESG reporting
- Website and digital platforms of international organisations

Responsible ones
- Directorate for Sustainable Development (ESG)

Regional population, presence

Goal
- Partnership for Sustainable Development
- Getting feedback from communities and NGOs
- Raising awareness of social and environmental initiatives

Mechanisms
- ESG report and annual report
- Participation in eco-activities and charity
- Media, website, social networks

Responsible ones
- Marketing, PR center, Branch Network Management Center

Public, social, environmental and charitable organisations

Goal
- Partnership in sustainable development
- Getting expert opinion and feedback
- Raising awareness about ESG Bank's projects and commitments

Mechanisms
- ESG reporting and annual report
- Environmental events and charity
- Media, website, and social networks

Responsible ones
- Marketing center, PR

Risk Management and Internal Control

IFRS S1

To ensure the financial stability and stable functioning of the Group, Bank CenterCredit has implemented a risk management system, which is a set of components that provide a mechanism for the interaction of internal procedures, processes, policies, and structural divisions of the Bank developed and regulated by the Bank in order to timely identify, measure, control, and monitor the Bank's risks, which is fully compliant with current legislation and generally accepted international practice.

The Bank's activities are based on a comprehensive approach to risk management, which includes identification, analysis and control of market, credit, operational and legal risks, risks of loss of business reputation and liquidity risks, which are the main risks that the Bank faces in the course of its activities.

The risk management and internal control processes are approved by the Bank's authorised management bodies and regulated by internal documents that include methods for identifying and managing significant risks for the Bank.

In 2024, ARDFM conducted an assessment of the quantitative and qualitative characteristics of STB activities and risks (SREP). The Bank was awarded a total score of 2 according to the 4-point scale. The result obtained means that the Bank is exposed to a medium or low level of viability risk.

Internal control

The effectiveness of risk management is ensured by the Bank's internal control system, which corresponds to the current market situation, strategy, volume of assets and level of complexity of the Bank's operations and provides for separation of powers in making risk decisions, ensuring data protection, compliance with the principle of dual control when conducting operations (the principle of "four eyes" and "shared access") and other control measures and methods.

The internal control system is a set of organisational measures, procedures and policies, internal control that ensure the Bank's long-term goals of profitability and maintaining a reliable financial and management reporting system that promotes compliance with the legislation of the Republic of Kazakhstan and regulatory legal acts of the authorised body, the Bank's policies, internal regulatory documents of the Bank, reducing the risk of losses or damage to the Bank's reputation, as well as to identify and prevent errors and distortions.

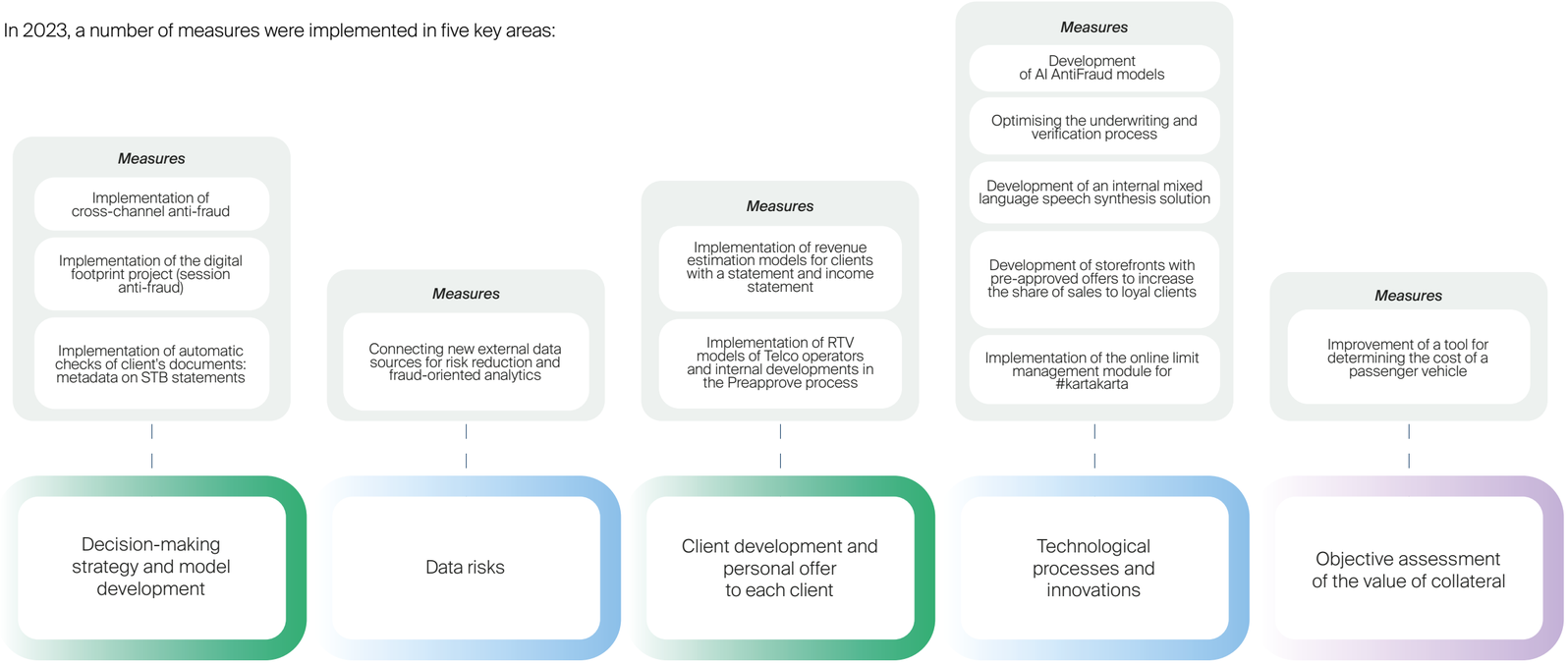
Internal control is an integral part of the Bank's risk management system, which ensures the Bank's performance, the safety of assets, and the completeness and reliability of financial statements.

The Bank's internal control system is based on the following principles:

- Participation in the internal control process of all structural divisions and employees of the Bank
- Internal control coverage of all areas of activity and business processes of the Bank
- Implementation of internal control on an ongoing basis All operations of the Bank involving risks go through the stages of preliminary, ongoing and subsequent control.

Development of the risk management and internal control system in 2024

In 2023, a number of measures were implemented in five key areas:



Information about compliance control can be found above.

The main regulatory documents of the risk management and internal control system

- Internal control policy
- Risk and Capital Management policy
- Market Risk Management policy
- Liquidity Risk Management policy
- Operational Risk Management policy
- Compliance Risk Management policy
- Know Your Customer policy
- Anti-money laundering policy, policy on countering financing of terrorism and the weapons of mass destruction proliferation
- Conflict of interest resolution policy

Organisation of risk management

Risk management is carried out at all levels of the Bank, including the Board of Directors, the Management Board and specialised risk management units. The Board of Directors is responsible for establishing the functioning of the risk management control system, managing key risks and approving risk management policies and procedures, as well as approving major transactions.

The Management Board is responsible for monitoring and implementing risk mitigation measures, as well as ensuring that the Bank operates within the established risk limits.

The risk management functions are responsible for overall risk management and monitoring the use of generally accepted methods for detecting, assessing, managing and reporting both financial and non-financial risks. Risk management functions are directly subordinate to the Board of Directors.

The Risk Management Unit is headed by the Vice President for Risk Management (CRO), who reports to the Board of Directors, the person with the highest operational responsibility for managing and overseeing risks, including ESG risks, environmental risks, social risks and corporate governance risks affecting the bank's profits and losses).

Among other things, the CRO is a single centre of responsibility at the Group level for managing and coordinating all risks, using the contributions of specialised departments directly subordinate to it, as well as other risk managers in the Bank and the Group's companies. In particular, on a semi-annual basis, the CRO provides senior management with management reports on risks and risk appetite, including risks of subsidiaries and group risks.

Credit, market, operational, interest rate, reputational, liquidity and compliance risks are managed and controlled both at the portfolio level as a whole and at the level of individual transactions. To improve the efficiency of the decision-making process, the Bank creates a hierarchical structure of committees depending on the type and size of risk exposure. The risk management system includes Credit Committees, the Risk Management Committee under the Management Board, and the Financial and Risk Management Committee under the Board of Directors.

Three lines of defence model

The Bank determines participants in risk and capital management based on a system of three lines of defense:

- The first line of defense is provided by the Bank's structural functions. Heads of structural functions are responsible for the organisation and implementation of internal control in the structural functions.
- The second line of defense is provided by the risk management, compliance control, legal functions, HR functions, financial control functions and other structural functions of the Bank that perform control functions.
- The third line of defense is provided by the internal audit unit through an independent assessment of the effectiveness of the internal control system.

The Bank provides regular training to employees aimed at increasing their awareness and competence in identifying, assessing and managing risks, taking into account their role and impact on the overall risk profile of the Bank. Training in terms of operational, reputational and compliance risks is mandatory for all employees of the Bank and is conducted at least twice a year, with a training coverage rate of 67.5% in 2024. Also, Board of Directors members always update their knowledge in risk management. For example, an independent director, Board of Directors member and Chairman of the Committee on Sustainable Development received SCR training and certification from GARP.

Risk management processes

In 2024, the Bank updated its Risk and Capital Management Policy approved by the Board of Directors of JSC Bank CenterCredit. The policy includes key processes and mechanisms that ensure the sustainability and security of banking activities.

The main processes of the risk management system take into account:

- **Risk identification and management:** Identification of significant risks, their timely identification, assessment, aggregation and forecasting.
- **Risk appetite and limits:** Setting clear limits and limits for all types of significant risks, as well as developing algorithms for actions in case of violation of these levels.
- **Monitoring and control:** Continuous monitoring and control of the level of assumed risks, as well as implementation of risk mitigation measures, where necessary.
- **Developing a risk culture:** Strengthening the culture and competencies of risk management throughout the Bank.

Risk identification process

The Bank pays high attention to risk management, especially focusing on identifying significant risks. This process is designed to identify and assess risks that may significantly affect the BCC's financial stability, reputation, or liquidity. The procedure begins with determining the total set of risks in the banking sector, then identifying those that are relevant to the Bank. The next step is a structured assessment of the significance of these risks, which includes formalising the results for subsequent analysis and monitoring. The Bank carries out a systematic risk identification procedure at least once a year. In 2024, the relevant types of risks were identified, among which, along with traditional risks for banks, are climate risk and social risk. The full list of identified risks is presented in the Annual Report for 2024.

Determining a risk appetite

The Risk Appetite Statement is a document approved by the Bank's Board of Directors that describes the aggregated level of significant risks that the Bank is ready to accept or intends to eliminate when implementing the strategy. The Bank's risk appetite covers all significant risks identified during the identification process. Quantitative indicators of risk appetite are used to assess manageable risks, while qualitative indicators are used for non-financial risks. The indicators and their corresponding risk appetite levels are recorded in the Risk Appetite Statement and are subject to review on a regular basis, at least once a year.

The process of establishing risk appetite is closely integrated with strategic and budgetary planning. This allows the Bank to compare the actual values of risk appetite with budget forecasts, ensuring effective control over compliance with the risk management policy at all levels of the organisation. The Bank conducts a risk assessment using risk assessment models at least twice a year with further updating of risk appetite levels.

Integration of ESG aspects into the Bank's risk and capital management process

In accordance with the principles of sustainable banking, the Bank is implementing a phased improvement of business processes, which provides for the creation of an effective ESG risk management system. Taking into account that the Bank's investment and lending activities have an indirect impact on the decarbonisation of the economy, climate risks are taken into account in capital management as factors affecting credit risk or other significant risks.

Risk management mechanisms

To maintain risks at an acceptable level, the Bank uses a number of risk management mechanisms:

- Monitoring: constant monitoring of the level of external and internal risk factors.
- Limiting: setting and controlling the maximum allowable values for risky positions and potential losses, ensuring that they correspond to the current level of risks.
- Hedging: insuring risks by taking positions that are opposite to a particular risk factor.
- Diversification: risk mitigation by preventing excessive concentration of risks.
- Provisioning: generation of provisions adequate to the accepted risks for possible losses on active operations, including loans, outstanding loans and equivalent debt.
- Collateral: providing assets exposed to credit risks with collateral, guarantees, comfort letters, and other types of collateral.

Promoting an effective risk culture

The Bank pays special attention to the risk management culture, which implies an active and open exchange of information about risks at all levels of the organisation. In order to develop the competence of employees, the Bank implements regular training programs aimed at mastering practical methods of assessing and minimising risks in daily work.

Rewards directly depend on the ratio of risk and performance, thus ensuring a responsible attitude to risky decisions. The Bank also implements mechanisms for adjusting variable remuneration based on all aspects of risk management, including compliance with established risk appetite levels.

The Bank also conducts a thorough risk analysis before launching new products or making significant changes to its current processes. This makes it possible not only to assess potential risks, but also to adapt the level of risk appetite to changing conditions, thus ensuring the stability and safety of operations.

Internal Audit Function

Within the framework of the three lines of defense model, the Internal Audit Function performs an independent and objective assessment of the effectiveness of the internal control and risk management system. The Internal Audit Function conducts an independent audit of the internal control and risk management system in accordance with the approved audit plan. Based on the results, management reports are prepared, which are reviewed by the Audit Committee under the Board of Directors and approved by the Board of Directors. The purpose of the report is to provide a well-founded professional opinion on how effectively and reliably the Bank's internal control and risk management system is functioning.

The independence and objectivity of the internal audit is ensured by the functional subordination of the Audit Committee, headed by an independent member of the Board of Directors, and the Board of Directors.

The Regulation on the internal audit unit defines the objectives, powers and responsibilities of the Internal Audit Function. The Internal Audit Function evaluates the system of internal control, risk management and corporate governance based on a risk-based approach and is based on the level of risks inherent in business processes. In turn, the Bank creates conditions for the smooth and effective implementation of its functions by the Internal Audit Function.

The Internal Audit Function conducts audits in all areas of the Bank's business and monitors the effectiveness of measures taken by the Management Board in response to risks identified during the audits. These measures are aimed at minimising risks and strengthening control mechanisms. In addition, the Internal Audit Function evaluates the effectiveness of the Bank's policies and procedures adopted, as well as the reliability of the accounting and information system.

The Head of the Internal Audit Function submits reports on the implementation of the Annual Internal Audit Plan and on the audit results for the respective reporting periods to the Audit Committee and the Board of Directors. Based on the results of audits, recommendations are developed to improve internal control procedures. The audit tasks stipulated in the Annual Internal Audit Plan for 2024 were completed in full, in addition, unscheduled work was carried out on behalf of the Bank's management.

In 2023-2024, the Internal Audit Function conducted four comprehensive inspections at the Bank's Head Office and branches, covering the processing and protection of personal data. In 2024, such inspections were carried out at the Head Office and at the Almaty regional branch. Based on the results of the inspections, the effectiveness of the internal control system was confirmed and the IAF concluded that most of the controls in the verified processes to ensure the confidentiality and security of personal information of customers are carried out properly.

The management of the Bank and its branches has been informed about the results of all audits in accordance with the established procedure, and the implementation of recommendations is under the control of the Internal Audit Function.

On a regular basis, the Head of the Internal Audit Function discusses with the Bank's management important and urgent issues related to the activities of the Internal Audit Function.

The main results of the Internal Audit Function's operation in 2024:

- a total of 94 processes of the Bank and branches were inspected (including IT audit of processes and unscheduled work);
- As part of risk-based planning, 10 processes were tested in 2023 and 10 processes in 2024 regarding the risk management and assessment system.
- The process of identifying outdated AML/CFT questionnaires based on the level of risk of clients in the context of branches has been automated, as a result, autotests have been developed jointly with the bank authorised for documentation to track transactions.;
- ETL processes have been developed and implemented to automatically import data into the local continuous audit database
- amendments have been made to the Regulation on the Internal Audit Function
- automation of signing of Internal Audit Function's notifications in the Electronic Document Management System has been implemented
- individual Internal Audit Function's employees received professional diplomas, took part in training courses (including a seminar on new IIA standards, financial management) and received 77 certificates, including a certificate on ESG (training for managers).

Risk management in sustainable development

GRI 201-2, SASB FN-CB-410a.2, IFRS S2

The Bank, as a large financial institution, recognises its influence on risks related to climate, ecology, social responsibility and corporate governance. Being aware of how these factors can affect financial stability, the Bank strives to make a positive contribution by participating in the formation of a national climate risk management system.

One of the key areas of activity in sustainable development is the introduction and development of practices for managing climate risks and opportunities. Since 2023, the Bank has been conducting an analysis of climate risks, in particular, it has identified physical and transition risks associated with its core business. In 2024, the bank approved a long-term Climate Strategy and conducted climate stress testing. A map of the Bank's risks and opportunities has been developed as part of the climate agenda.

Priority tasks in this area also include the development of an effective risk management system related to climate change; step-by-step improvement of business processes to include climate risk monitoring; formation and development of the risk culture of the Bank's employees in terms of ESG; consideration of significant risks associated with climate change when establishing risk appetite.

The Bank's risk and opportunity map within the framework of the climate agenda

In the course of its activities, the Bank evaluates two types of climate risks from the point of view of the loan portfolio:

- physical risk associated with natural phenomena resulting from climate change
- transition risk associated with the transition to a low-carbon economy

The Bank's assessment of climate risks is carried out:

- On a short-term horizon, implying the current period, using the ESG scoring tool for borrowers
- On a long-term horizon to 2030 and 2050 through climate stress testing

To determine the potential impact of climate risks on financial stability and sustainability, the Bank conducted an industry analysis, assessing the inherent exposure of large business companies to climate-related physical and transition risks. The analysis of the impact of significant climate risks and adaptation plans are defined in the bank's climate strategy.

Physical climate risks:

- According to the results of the analysis conducted by the Bank, the risks of floods (river floods) and fires (as a result of droughts and an increase in average annual temperature) are the most dangerous physical climatic risks, the exposure to which is higher in Kazakhstan on average than globally.
- The realisation of physical risks is significant for the Bank, as it can result in direct losses due to the destruction of real estate and indirect losses due to the temporary loss of solvency of borrowers.
- The Bank analyses the potential financial consequences of flood and fire risks during the climate stress testing procedure for the horizons up to 2030 and 2050, focusing on assessing the potential impact on the portfolio of real estate that is pledged for a period of 5 years or more.
- The impact of physical climate risks is manifested to a greater extent through the Bank's loan portfolio, therefore, a complete minimisation of their impact may be unattainable. The Bank is taking steps to mitigate this impact by adapting its work with clients and conducting a regular reassessment of collateral. The Bank is also preparing to comply with potential regulatory requirements on climate risk management.

A plan to adapt to potential physical climate risks:

- The Bank's operating activities are not subject to physical climate risks, with the exception of a minor potential impact on real estate (branches), therefore, the Bank does not need special adaptation of operations or assets.
- The Bank analyses physical climate risks in its portfolio through climate stress testing of physical risk and borrower data using the ESG scoring tool.
- Taking into account the identified risk areas, the Bank is developing an action plan for working with clients starting in 2025 and later. The measures will include initiatives aimed at educating clients on methods of minimising physical climate risks and facilitating this process, for example, the Bank will create a book of green projects.

Climate transition risks:

- The most significant climate transition risks for the Bank are the impact on borrowers of stricter carbon regulations and legislation both at the internal level (the greenhouse gas emissions trading system in the Republic of Kazakhstan) and at the external level (The EU Carbon Border Adjustment Mechanism, CBAM).
- The expected increase in prices for carbon units, an increase in the number of emission trading system participants and other regulatory measures will increase the financial burden on carbon-intensive companies represented in the Bank's loan portfolio, which may result in losses for the Bank due to a decrease in the solvency of borrowers.
- The Bank assesses potential financial losses from the implementation of transition risks by using climate stress testing of theclimate transition risk of the loan portfolio covering the horizons up to 2030 and 2050, and also analyses the clients' climate risks for the current period through the ESG scoring tool and communication with borrowers regarding their readiness to tighten carbon regulations.
- In the future, the Bank plans to improve its skills in managing transition risks and gradually adapt its interaction with clients, focusing, among other things, on changes in legislation and regulatory requirements, for example, requesting and analysing climate risk mitigation plans and a decarbonisation strategy from carbon-intensive borrowers.

Client ESG risk assessment

ESG Risk Management

Since 2023, the Bank has been implementing and developing approaches in responsible financing, providing for a comprehensive assessment of climate, environmental and social risks, as well as ESG factors (the “integrated assessment”) for corporate borrowers and projects.

The Bank carries out a comprehensive assessment, taking into account the borrower's belonging to the business segment and the threshold of materiality in terms of the amount of his obligations to the Bank. The material thresholds are set by the Committee for Sustainable Development under the Board of Directors.

The result of a comprehensive assessment is the assignment of a risk level to the borrower and/or the project, correlated with one of the following categories: low, reduced, medium, increased, critical.

Risk assessment actions within the framework of compliance with the principles of responsible financing:

- checking the client for compliance of their activities and practices with the list of unacceptable activities (determined on the basis of best practices and specifics of the market of the Republic of Kazakhstan)
- assessment of the borrower's exposure to climate risks, as well as the importance of environmental, social and corporate governance factors in the borrower's activities
- assessment of the risks of the project, including an assessment of management practices and general information, and the positive effects of the project in accordance with the criteria of the green and social taxonomy.

Bank CenterCredit case

ESG scoring, the key tool for assessing the borrower's performance

To assess the exposure of the largest borrowers to climate risks and other ESG factors, the Bank uses a process and tool called ESG scoring, which includes an assessment of the inherent exposure of the borrower's industry to climate, environmental and social risks, as well as mitigation measures and adaptation initiatives of the borrower in ESG.

The assessment of the inherent exposure to climate risks/ESG factors of borrowers' operating industries is carried out in the context of such factors as: climate impact, environmental impact and local population, taking into account the industry specifics of the Republic of Kazakhstan.

Determining the availability/assessment of mitigation measures/ adaptation initiatives of a particular borrower, that is, assessing the availability/effectiveness of mitigation measures and adaptation initiatives of a particular borrower aimed at reducing inherent exposure to climate risks/ESG factors, takes into account business practices, including: waste management, water use, land use, interaction with suppliers, commitment to compliance with human rights human rights, corporate governance practices, including HR. The assessment is carried out through an ESG questionnaire filled out by the borrower together with the Bank.

The Bank provides financing to borrowers and/or projects with low and reduced levels of non-compliance with ESG principles, in accordance with the standard internal procedure and Policy of Lending and Credit Risk Management at JSC Bank CenterCredit. The level of non-compliance with ESG principles is reassessed at least once a year.

Financing of borrowers and/or projects with an average, elevated and critical level of non-compliance with ESG principles is carried out taking into account an in-depth analysis (in addition to the standard internal procedure), which provides:

- definition of additional covenants
- development of a roadmap for the implementation of adaptation initiatives
- implementation of measures to minimise exposure to climate risks

At the current stage, the described procedures and tools allow the Bank to assess the ESG risks of its clients and the positive environmental and social effects of the funded projects in a granular manner.

The applied approaches and principles build a solid foundation for the gradual introduction of a more advanced responsible financing mechanism in the future in order to achieve the objectives of the Climate Strategy.

In 2024, a number of new regulatory and legal acts were adopted in responsible financing:

- Methodological Guide for banks and other financial organisations "Environmental and Social Risk Management" of ARDFM;
- The rules for the formation of a risk management and internal control system for second-tier banks and branches of non-resident banks in the Republic of Kazakhstan have been supplemented with requirements for an environmental and social risk management system.

The Bank has developed a plan to bring its activities in full compliance with these recommendations and requirements.

Step 1	Step 2	Step 3
Compilation of a GAP analysis based on the results of the regulatory	Making appropriate changes to the internal regulatory documents	Adjustment of existing procedures and business processes.

Labelling the loan portfolio with indicators of sustainable development

In 2024, as part of the task of increasing green financing and for the formation of regulatory reporting, the process of labelling the loan portfolio in accordance with the categories of the green Taxonomy of the Republic of Kazakhstan was introduced.

The Bank has approved the internal regulatory documents: Regulations for Labelling the loan portfolio with indicators of sustainable development, which describe the conditions and the process of assigning a sign of loan compliance to a green taxonomy.

Labelling is carried out to ensure the fulfilment of the following tasks:

- formation of regulatory reporting
- control and monitoring the fulfilment of the Bank's goals to increase green/sustainable financing as part of the Bank's climate strategy
- control over the use of funds raised through green bonds and green loans
- formation of non-financial reporting (Sustainability Report).

The Bank independently, using the internal expertise of its employees, decides whether to assign the project to a specific subsector of the Taxonomy and assigns the green credit attribute. When deciding on the recognition of a loan as green, the Bank may also take into account a number of international principles and documents in sustainable development, including, but not limited to:

- Principles of green bonds of the International Capital Markets Association (Green Bonds Principles, ICMA)
- Taxonomy of Sustainable Economic Activities of the European Commission (EU)
- Taxonomy of climate bonds (Climate Bonds Standard)



Plans for the development of the sustainability management system

Further development of the risk management system in sustainable development is planned for 2025. In particular, the following initiatives:

- Green bond issue
- Updating the Responsible Financing Policy, taking into account new regulatory requirements and recommendations
- Full implementation of responsible financing tools for all loans of legal entities
- Conducting climate stress testing on an annual basis

Successful implementation of the planned initiatives will provide the Bank with the necessary competencies for effective ESG risk management and will raise the maturity level of sustainable practices. This will create a solid foundation for further implementation of expanded principles and methods in ESG and climate issues in the coming years. Additionally, this ensures full compliance with the new regulatory requirements of the regulatory authorities.



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Bank's contribution to achieving UN Sustainable development goals

In 2024, the Bank conducted a comprehensive analysis of the current status of achieving sustainable development goals and concluded that it was advisable to maintain the existing priority Sustainable Development Goals (SDGs). To learn about the SDG assessment mechanism, see the Sustainability Report for 2023.

To learn about the SDG assessment mechanism, see the Sustainability Report for 2023.

In June 2024, Bank CenterCredit presented the first UNGC Progress Report. The report demonstrates the bank's ongoing efforts to integrate the Ten Principles of the UN Global Compact into our company's business strategy, corporate culture and daily operations, as well as its contribution to achieving UN goals, especially the Sustainable Development Goals.



UN SDG prioritised for Bank CenterCredit



Alignment of material topics with the UN Sustainable Development Goals



Workplace safety and health

BCC's contribution in 2024

- The Bank provides charity and social support to medical institutions[6] .
- The Bank organises medical insurance programs for employees, as well as provides medical care and pays appropriate compensation in cases of work injuries and occupational diseases.



Staff training and development

BCC's contribution in 2024

- The Bank actively develops educational programs: it conducts offline seminars and trainings, develops and implements distance learning courses for employees, and supports professional development of employees in external organisations[7] .



Workplace safety and health
Customer satisfaction

BCC's contribution in 2024

- The Bank conducted an expert consultation with the UNDP in terms of human rights
- The Human Rights Policy was updated in the reporting period
- A number of seminars and trainings have been held in the area of inclusivity and human rights
- The "Gender Plan for 2025-2026"[8] has been developed jointly with the EBRD and the Frankfurt Business School



Climate change

BCC's contribution in 2024

- By the end of 2024, water consumption in the bank's own buildings has been reduced by more than 20% compared to 2023.
- Measures and recommendations are being implemented based on the results of the energy audit of BCC[9] facilities.



Climate change

BCC's contribution in 2024

- The Green Office project is being implemented: energy efficiency.
- Measures and recommendations are being implemented based on the results of the energy audit of BCC facilities.
- The total reduction in energy use (in GJ) compared to 2023 was 4%
- The fleet of electric vehicles and the number of chargers in the bank building have been increased.
- I-REC[10] renewable energy certificates have been purchased



Economic performance
Customer satisfaction
Availability of financial products and services

BCC's contribution in 2024

- The Bank's total limit on financing of DAMU Entrepreneurship Development Fund JSC has been increased to 62 billion tenge
- Additional funding was attracted under the programs of DAMU Entrepreneurship Development Fund JSC for a total amount of 13 billion tenge
- Additional funding was attracted under the programs of KDB JSC for a total amount of 9 billion tenge
- EBRD funding was attracted to finance SMEs, women in business, and GEFF green technologies for a total amount of 28 billion tenge.
- The full placement of tranche B under the EBRD's Green Technology Lending program in the amount of 4.8 billion has been completed. Tranche C in the amount of 9.6 billion was utilised by 90%;
- Funding from the Agrarian Credit Corporation was raised to finance agricultural sector totalled 12.2 billion tenge
- As part of the funding programs, the Bank issued 3005 loans in the amount of 81.8 billion tenge[11] in 2024.



Digitalisation and innovation
Information security

BCC's contribution in 2024

- A new mobile application version 4.0 has been launched. The application has received new functionality and visual, providing an improved interface and convenient access to all services.
- In 2024, the Bank completed the digitalisation of the entire range of retail credit products.
- KASE Global Platform was,launched
- In 2024, a specialised Directorate for personal Data Protection[12] was established



Climate change

BCC's contribution in 2024

- The bank's long-term Climate Strategy has been developed and approved.
- The principles of responsible financing are being introduced into the bank's business processes.
- The implementation of the Green Office project continued: energy efficiency, waste.
- Financing of "green" projects under the GEFF II program at the bank (from the end of 2023) has resulted in a reduction in CO2 emissions by more than 150,000 tons per annum[13].



Availability of financial products and services
Anti-corruption management

BCC's contribution in 2024

- Since 2023, the Bank has been a member of the UN Global Compact.
- The Bank has been a partner of the EBRD in the GEFF (Green Economy Financing Facility) financing programs since 2021, as well as the EBRD Women in Business (WiB) Programme since 2018.
- The Bank was a Partner of the UNDP Renewable Energy financing program (the program was (the project was closed in 2024).
- The Bank is the general partner of the TURAQTY JOL National Social Eco Campaign of the UNESCO Regional Office

[6] For more details please see section 7.5
[7] For more details please see section 6.2
[8] For more details please see section 4.3
[9] For more details please see section 8.3
[10] For more details please see section 8.2
[11] For more details please see section 7.3
[12] For more details please see section 5.4
[13] For more details please see section 8.2

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Respect for human rights, business ethics and anti-corruption

GRI 2-15, 2-16, 2-23, 2-24, 2-25, 2-26, 2-27, 3-3, 205-2, 205-3, 206-1, 410-1, SASB FN-CB-510a.1, SASB FN-CB-510a

Approaches to ensuring respect for human rights

GRI 2-1, 2-3, 2-5

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

- Continuously increase the positive impact and at the same time prevent or mitigate the negative impact on human rights that is directly related to the Bank's activities.
- Provide 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.

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



In the 1st quarter of 2024, the Bank engaged expert advice from the United Nations Development Programme (UNDP) in human rights.

Based on the analysis of the bank's internal procedures, the UNDP experts noted the bank's commitment to systematically address human rights issues, as well as the fact that the bank has identified a number of priority human rights issues for itself: ensuring the labour rights of employees, preventing discrimination and ensuring inclusivity, and ensuring respect for human rights in supply chains. At that, the UNDP experts noted areas for improvement in human rights practices.

As a result of the consultation, changes were made to a number of the Bank's internal regulatory documents in 2024. Updates to the Human Rights Policy and updates to the Regulations on Interaction with Counterparties were approved, in accordance with the ESG rules of JSC Bank CenterCredit. A number of changes to the existing procedures are planned for 2025, in particular, additions to the Personnel Policy were made in the first quarter of 2025.

Human rights regulatory framework

International legal acts

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- The United Nations Guiding Principles on Business and Human Rights
- Principles of responsible banking developed under of the United Nations Environment Programme Financial Initiative (UNEP FI)
- OECD Guidelines for Multinational Enterprises

National regulations

- Constitution of the Republic of Kazakhstan
- Labour Code of the Republic of Kazakhstan

Internal regulatory documents

- Corporate Governance Code
- Sustainable Development policy
- Regulation on the acquisition of fixed assets, intangible assets, inventory, works/ services
- Anti-corruption policy
- Responsible financing policy
- Personnel policy
- Regulations on interaction with Counterparties, according to the ESG rules

Human rights obligations towards significant stakeholders

The Bank applies a comprehensive approach to the observance of human rights, covering various aspects of the organisation's activities and paying special attention to interaction on human rights issues with stakeholders. The Bank, when interacting with stakeholders, respects human rights, and also takes measures to ensure that its stakeholders are familiar with the Human Rights Policy and the Sustainable Development Policy of JSC Bank CenterCredit, share the Bank's commitment to the principle of respect for, support and promotion of human rights . The Bank's business partners are expected to pay special attention to their own human rights standards and procedures, including the working conditions of their employees. In the current version of the Human Rights Policy, the Bank clarifies its Obligations to respect human rights in relation to significant stakeholders, among whom the Bank's employees, society and the population of the regions where it operates, the Bank's customers, and suppliers are highlighted.

The Bank's human rights obligations

The Bank has identified the following key obligations in respect and protection of human rights, which it strives to observe at all stages of its activities:

- Respect for human dignity and human rights
- Unacceptability of any form of discrimination
- Respect for the right of employees to freedom of assembly and association, freedom of opinion and expression
- Unacceptability of the use of child and forced labour
- Ensuring decent working conditions and compensation
- Ensuring a safe and healthy working environment
- Unacceptability of any form of violence
- Respect for the rights, cultural characteristics and customs of the populations of the regions of presence
- Prevention of human trafficking
- Right to collective bargaining

The Bank's human rights activities

Responsible financing

Following the principle of due diligence, the Bank conducts a procedure for assessing potential and ongoing projects for social and environmental impacts according to criteria developed by the Bank. This allows the Bank to manage environmental and social risks when financing corporate clients' projects. The Bank's responsible financing policy includes strict adherence to human rights principles. In particular, the Bank excludes from financing business practices that violate these principles, such as:

- Non-compliance with the minimum age for employment or child labour
- Forced labour and slavery
- Employment of women in underground mining of any kind
- Contradictions in the area of human rights, labour relations, ecology or management.

Interaction with suppliers

The Bank builds relationships with suppliers based on the principles of honesty and mutual respect, fairness and non-discrimination. The Bank strives to cooperate with suppliers who have an impeccable business reputation, who base their activities on the principles of strict compliance with the requirements of the legislation of the Republic of Kazakhstan, business ethics and honest partnership, who take care of the labour and health of their employees, demonstrate respect for the environment, and respect for human rights.

The Bank expects suppliers to demonstrate commitment to an active policy regarding the creation of comfortable working conditions, safety at work, and the prevention of any form of discrimination. The use of child labour, forced labour, bonded labour, are strictly prohibited in the activities of the Bank's suppliers. In addition, the Bank expects its suppliers to define their own environmental policy aimed at developing a reasonable and careful attitude to the environment among their employees.

Starting from 2024, the Bank's counterparties participating in tenders must familiarise themselves with the Bank's Code of Corporate Ethics, as well as undergo a questionnaire, which was developed taking into account the principles of respect for human rights provided for by the Constitution and the Labour Code of the Republic of Kazakhstan, and also takes into account a number of international documents in this area. Following a consultation from the UNDP in 2024, the format of the survey was clarified, in particular, some issues in the area of human rights and social responsibility of suppliers were finalised.

Customer relations

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

- Exclusion of any activity that may damage the business reputation and other non-material and material interests of customers
- Inadmissibility of any form of discrimination against customers
- Confidentiality of any information, including personal data of customers
- Inadmissibility of unjustified refusal to provide the Bank's products and services to the customer
- Timely response to customer comments, complaints and claims against the Bank, taking measures to eliminate the consequences of violations and omissions

The Bank has a wide network of branches and provides products and services in all regions where it operates, actively interacts with the population, including vulnerable segments of the population. The Bank creates conditions for persons with disabilities to access the Bank's products and services without hindrance.

Human rights education

In order to raise awareness of human rights and inclusivity, in 2024, the Bank initiated human rights training among employees on an internal online platform. The course “Bank and Human Rights. The Bank's Corporate Human Rights Policy” was implemented in March 2024 for all employees. In addition, in February 2024, together with representatives of the European Bank for Reconstruction and Development (EBRD) and the Frankfurt School of Finance & Management, a webinar for employees “Human rights, diversity and inclusion in business” was organised.

In the 1st quarter of 2025, the Gender awareness workshop was organised jointly with representatives of the European Bank for Reconstruction and Development (EBRD) and the Frankfurt Business School. The training was aimed at raising awareness of gender issues, as well as meeting the Bank's priority goals (UN SDG 5 “Gender Equality”) and the objectives of the EBRD's Women in Business program. The seminar was conducted by a lecturer from the Frankfurt Business School, an expert in the area of gender equality, an international consultant, together with a regional expert. From February to July 2025, the bank plans to participate in the United Nations Global Compact Business and Human Rights Accelerator program.



source: facebook EBRD Kazakhstan's post

Approaches to business ethics and anti-corruption issues

GRI 2-15, 2-16, 2-23, 2-25, 2-26, 2-27, 3-3, 205-2, 205-3, 206-1, 410-1, SASB FN-CB-510a.1, SASB FN-CB-510a.2

Anti-corruption management

GRI 3-3, 205-2, 205-3

The Bank does not accept corruption in any form and manifestations. In 2023, the Board of Directors approved a publicly available Anti-Corruption Policy developed in accordance with the legislation of the Republic of Kazakhstan and the Bank's internal regulatory documents.

The purpose of the Policy is to strengthen control over the prevention and detection of corruption, as well as the formation of the principle of zero tolerance for corruption in the Bank.

The objective of the Policy is to foster a corporate culture among the Bank's employees that ensures compliance with the principles of honesty and transparency in the performance of official/functional duties, and intolerance to corruption.

All employees of the Bank, regardless of their position, are personally responsible for compliance with the principles and requirements of the Anti-Corruption Policy, as well as for the actions (inaction) of their subordinates who violate these principles and requirements.

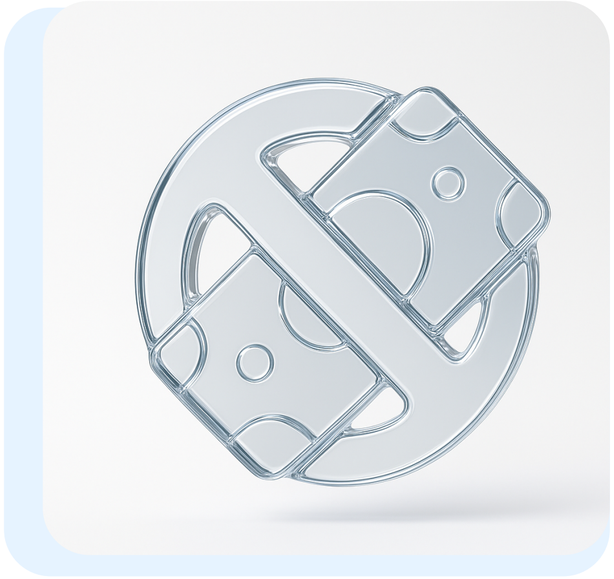
In this regard, all employees of the Bank are required to familiarise themselves with the Anti-corruption policy. Monitoring of this process is carried out by the Directorate of Internal Security of the Security Center. In 2024, 100% of employees, including members of the governing bodies, are informed about the Bank's anti-corruption policy.

The Bank also has a Policy on countering corporate (internal) fraud when considering applications for retail loans for unsecured loans, the purpose of which is to implement effective measures to prevent corporate fraud in the Bank, create a uniform understanding among the Bank's employees and its customers of the Bank's position on non-acceptance of fraudulent activities in any of their forms and manifestations, as well as reduce risks of corruption and fraud in the Bank.

During the reporting period, there were no cases of corrupt practices confirmed during internal or external audits. Accordingly, the Bank was not subject to penalties were or other penalties for corruption-related violations.

In 2024, a separate mandatory anti-corruption course for employees was launched, which aims to raise awareness and train employees in methods for recognising and preventing corrupt practices within their activities.

In 2024, 100% of the members of the Bank's management bodies were trained in anti-corruption issues.



Anti-corruption training for employees:

Indicator	2022	2023	2024
Number of employees who have completed training	2,734	3,865	**5,139**
Percentage of employees who completed training	42.6%	57.5%	**73.1%**

The Bank has a channel to enable employees and other persons to confidentially or anonymously express their reasonable observations and suspicions of corruption offenses by sending information to the following email address: fraudinfo@bcc.kz All reports of corruption offenses in the Bank are subject to an audit or internal investigation in accordance with the terms of the Regulation for the Organisation and Conduct of an internal investigation by the Security Center at JSC Bank CenterCredit with the participation of the relevant structural divisions of the Bank.

Business Ethics

GRI 2-23

The Bank adheres to high standards of business practice and pays close attention to business ethics issues. BCC is convinced that the responsibility of every modern bank is not only to strive for financial growth, but also to adhere to a high level of business standards.

All employees of the Bank must adhere to standards of conduct consistent with the Bank's corporate values. Standards of conduct imply adherence to the principles of honesty, professionalism, efficiency and goodwill in dealing with internal and external clients of the Bank. The Bank has approved a public document, the Corporate Ethics Code for employees of JSC Bank CenterCredit. This is a set of corporate rules, principles, and standards of conduct that governs the moral and ethical aspects of relationships within the Bank, as well as describes the requirements and expectations regarding ethical business conduct when interacting with external parties: customers, suppliers, and contractors, government officials, the public, and competitors.

The provisions of the Code are binding on all employees of the Bank in the performance of their official duties, in their relationships with each other, with shareholders, customers, business partners, government authorities, the public and other interested parties in carrying out banking activities. Disciplinary penalties may be applied to Bank employees for violating the provisions of the Code, during which various restrictions on motivational tools may be applied to employees, including non-application of existing bonus programs and failure to provide salary increases.

The Code has been developed in accordance with the legislation of the Republic of Kazakhstan, generally accepted provisions of the business culture, and other internal documents of the Bank.

Conflict of interest resolution

GRI 2-15

Effective management of conflicts of interest significantly contributes to increasing the transparency and responsibility of the Bank to its customers and partners. Therefore, BCC consistently applies all available measures for careful management and minimisation of possible conflicts of interest.

Policies and procedures

The Board of Directors of the Bank approved the Conflict of Interest Resolution Policy and the Rules for Preparing and Maintaining Information about Affiliated Persons/Persons with Special Relations with the Bank. These documents are mandatory for all employees to follow when working with clients, partners, suppliers, competitors and other third parties. At that, the Bank particularly focuses on preventing any conflict between personal interests and official duties of an employee, obliging employees to put the interests of clients above their own when performing professional duties. Each employee is required to immediately notify their supervisor of any potential or existing conflicts of interest in writing, as well as inform the Chief Compliance Officer. Management, in turn, should assess the potential risk to the Bank and take measures to comply with standard conditions when making decisions and making transactions.

Management structure

The Bank's organisational structure and collegial bodies are created, and powers are distributed taking into account the minimisation of conflicts of interest and ensuring objectivity in decision-making.

Ensuring that the Bank organises measures to identify, assess and control conflicts of interest lies with the Compliance control unit.

It is also important to note the key role of the Board of Directors in managing conflicts of interest in the Bank. Thus, in order to prevent and mitigate conflicts of interest, members of the Board of Directors are required to:

- Undergo an approval process before assuming duties in other organisations to prevent conflicts of interest
- Immediately inform about any potential or actual conflicts of interest
- Abstain from voting on issues where they have a personal interest

Examples of regulated conflicts

The Bank actively manages situations that potentially result in a conflict of interest, such as:

Remuneration from third parties:

- a conflict may arise if an employee or their relative receives remuneration for the services provided to the client.

Confidential information:

- a conflict is possible if confidential information is shared with unauthorised persons.
- Additional benefits and gifts: a conflict may occur if an employee serving a customer improperly receives or offers valuable gifts.

Additional benefits and gifts:

- a conflict may occur if an employee serving a customer improperly receives or offers valuable gifts.

Conflict of interests:

- a conflict is possible if the employee involved in the task has a personal interest or cannot be impartial.

Personal transactions of employees:

- a conflict may arise if employees conduct securities or currency transactions on their own behalf, using information obtained from the client's transactions or otherwise at the client's expense.

Appointment of employees:

- a conflict may arise when appointing relatives to subordinate or related positions.

Information disclosure and transparency

BCC ensures full transparency in accordance with the requirements of the legislation and internal documents of the Bank, regularly publishing information, including information related to conflicts of interest through official information disclosure channels, including information about affiliated companies and shareholders, as well as transactions that may cause interest.

Through strict control and systematic monitoring, the Bank maintains high standards in conflict of interest management, which helps strengthen its reputation as a reliable and stable financial institution, demonstrating its commitment to honesty and transparency, which is the foundation of the trust of customers and partners.

Informing about critical issues

GRI 2-16

To ensure transparency and effective corporate governance, the Bank strictly adheres to the established principles of informing about the most significant issues that can have a significant impact on its activities. According to these principles, information about critical issues is promptly brought to the attention of the supreme corporate governance body at in-person meetings of the Board of Directors and at monthly meetings with the Management Board. These issues are also reflected in management reporting.

The Bank is continuously working to improve its corporate governance system, paying special attention to timely informing about all significant aspects of its activities. This helps to strengthen the trust of shareholders, customers and partners. During the reporting period, the Bank did not encounter any critical issues requiring notification to the highest corporate governance body.

Compliance with the law

GRI 2-27, 206-1, SASB FN-CB-510a.1

The Bank maintains high standards of compliance with the legislation of the Republic of Kazakhstan and the requirements of the financial regulator. In the reporting year 2024, the Bank demonstrated its commitment to the principles of legality and responsibility in its activities. Despite this, there were cases when the requirements of the legislation were not fully complied with.

Thus, in the reporting period, the National Bank of the Republic Kazakhstan imposed 5 fines against the Bank for a total of 1,550.6 thousand tenge. Also, in the reporting period, 7 cases were recorded for which non-monetary sanctions were applied. It is important to note that no significant cases of non-compliance with laws and regulations were identified[14] during the reporting period .

Active interaction with the regulator during the audit, timely response to warnings for violations, made it possible to avoid significant cases of violations of the law.

In addition, the Bank strictly adheres to the norms of antimonopoly legislation and supports the principles of fair competition in the market. During the reporting period, no lawsuits related to anti-competitive behavior or violations of antimonopoly legislation were registered.

The Bank confirms its commitment to the principles of legality and openness, as well as its readiness to further improve its internal control system and comply with all regulatory requirements.

The Group of Companies also consistently complies with high standards of compliance with the legislation of the Republic of Kazakhstan and regulatory requirements of relevant authorities. However, during the reporting period for 2024, some cases of incomplete compliance with established standards were noted. Information on penalties or other penalties for cases of non-compliance with laws and regulations for the group of companies is provided in Databook 2024.

[14] Significant cases of non-compliance are understood as such violations of mandatory requirements of legislation and regulatory legal acts, which, if repeated three times, may result in the suspension or termination of the organisation's activities in accordance with the current legal regulation.

Development Plans

GRI 410-1

Bank CenterCredit case

As part of the EBRD's Women in Business (WiB) Program, the Bank, together with the Frankfurt School of Finance & Management, has developed a "Gender Plan" for 2025-2026, a list of initiatives in gender equality. The initiatives include training of the bank's employees and managers, projects, and annual disclosure of information in gender equality.

As part of the implementation of the gender plan in the first quarter of 2025, the bank conducted executive training delivered by experts at the Frankfurt School "Gender awareness workshop", and also launched the "Business-Aru" competition, a project to support women's entrepreneurship.



In 2025, the Bank will focus on strengthening the anti-corruption and fraud system through the following measures:

- Improving internal investigation methodologies with an emphasis on identifying risks and vulnerabilities in operational processes.
- Implementation of new tools for monitoring compliance with recommendations following investigations.
- Regular preparation of reports for publication purposes as part of ESG reporting.
- Development and implementation of interactive learning tools (videos, newsletters, training courses) for employees and clients of the Bank on effective anti-fraud methods.

In 2025, as part of the tasks to optimise the process of dealing with customer complaints, a unified BI analytical reporting system will be developed for the Bank's Authorised Bodies, which will significantly facilitate the analysis of complaints with the aim of reducing the volume of complaints.

To improve the quality of contact between the client and the Bank, it is planned to create a single integrated Contact Quality indicator that combines the main quality indicators that are important to the client. Defining target (annual) and strategic metrics for contact quality indicators and creating a process for responding to changes in metrics will ensure not only efficiency in levelling identified problem areas, but also proactive efforts to improve service, products, and processes.

In 2025, the Bank intends to continue and expand its human rights education program, including regular training on human rights policies and procedures for all categories of employees to ensure full compliance with relevant standards and norms.

It is planned to hold seminars aimed at raising awareness of gender issues throughout the year for all employees.

In 2025, the Bank plans to gradually implement a behavioural risk management system based on G20 Principles for Financial Consumer Protection. This step is aimed at ensuring transparency and fairness in customer relations, minimising potential conflicts of interest, and preventing unethical practices.

As part of the development of the environmental and social risk management system, the Bank integrates social factors into investment decision-making and lending processes. This involves assessing the impact of funded projects on local communities, creating jobs, respecting human rights, and ensuring fair working conditions.



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Interaction with customers and suppliers

GRI 2-15, 2-16, 2-23, 2-24, 2-25, 2-26, 2-27, 3-3, 205-2, 205-3, 206-1, 410-1, SASB FN-CB-510a.1, SASB FN-CB-510a

Bank CenterCredit establishes and maintains long-term mutually beneficial relations with customers, suppliers and contractors, guided by the principles of honesty and high ethical standards. Open dialogue and respect are key elements of the Bank's communications, which carefully select business partners, giving preference to companies with similar values.

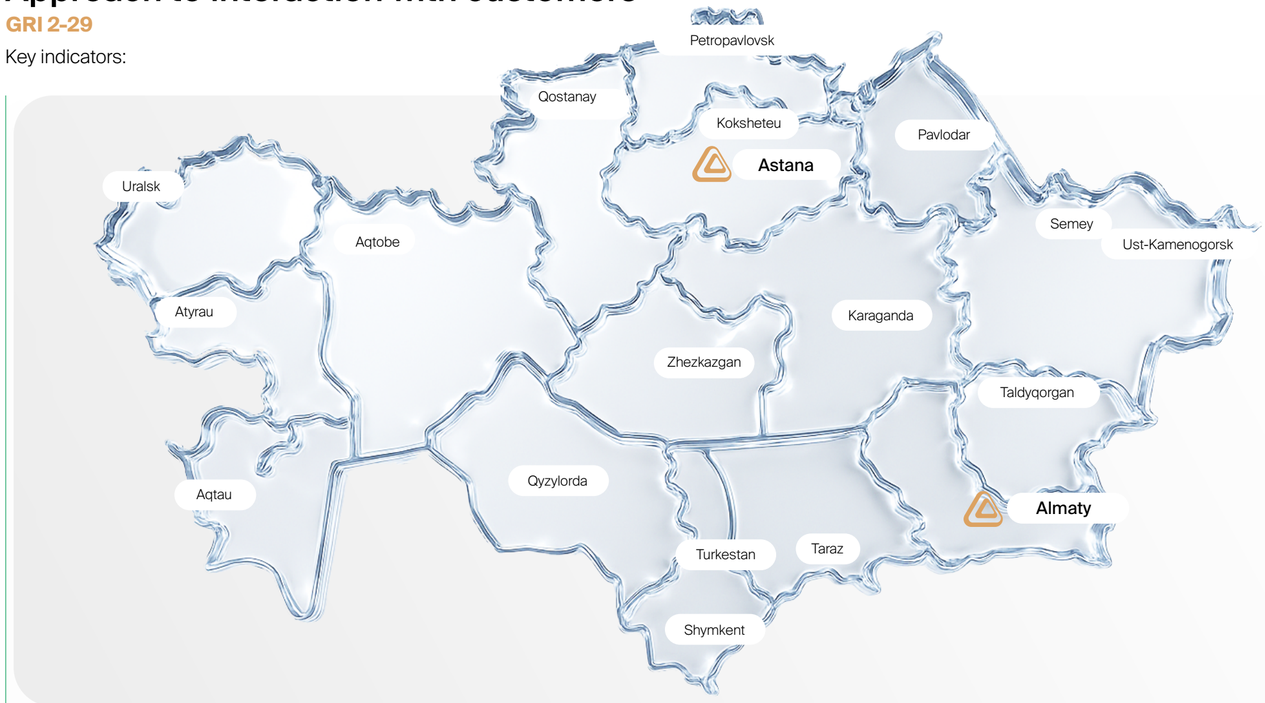
- Regulation on interaction with Counterparties, according to the ESG rules in JSC Bank CenterCredit
- Corporate Governance Code for employees of JSC Bank CenterCredit
- Human Rights Policy of JSC Bank CenterCredit
- Sustainability Policy of JSC Bank CenterCredit



Approach to interaction with customers

GRI 2-29

Key indicators:



21 branches

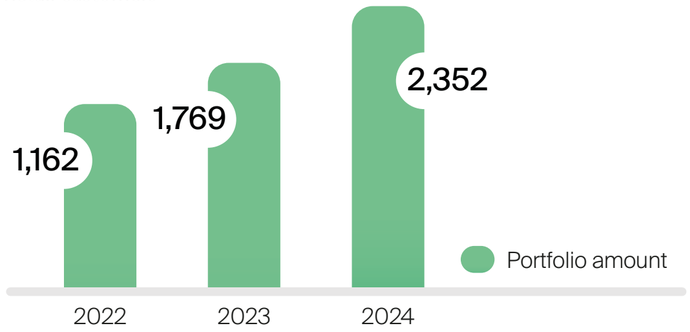
156 facilities

870 ATMs

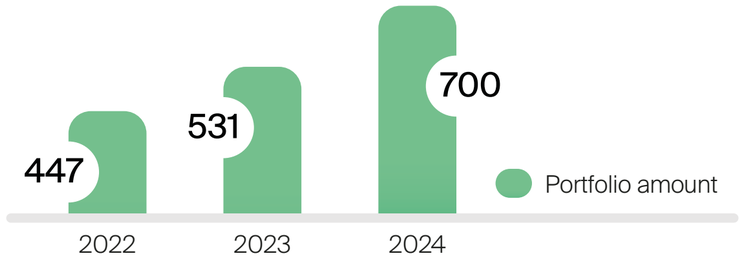
> 3 million clients

Dynamics of loan portfolio growth by type of client in billion tenge

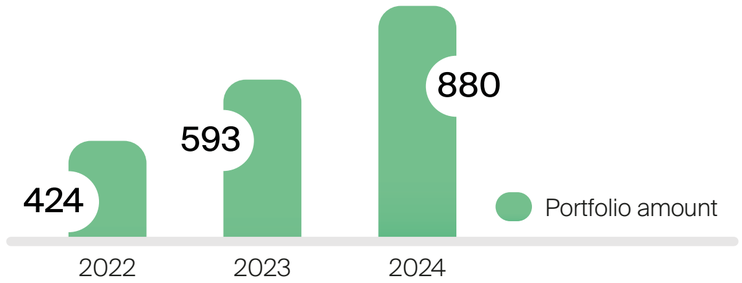
Retail customers



Large business



Small and medium-sized businesses



Bank CenterCredit strictly adheres to the legislation of the Republic of Kazakhstan and strictly fulfils its obligations to customers. The customer policy is based on respect, individual approach and priority of interests of each customer.

The Bank ensures the protection of customers' rights in accordance with applicable laws and internal regulations, and adheres to a zero tolerance policy towards fraud and unfair behaviour of employees. The principles of avoiding unreasonable decisions and the prohibition of obtaining personal benefits from customers are an integral part of the corporate culture.

To strengthen trust and increase transparency, the Bank regularly conducts business ethics trainings, ensures transparency of operations, and promptly informs customers about the status of their requests. This approach contributes to the formation of stable and mutually beneficial relations that support the stable development of all stakeholders.

Principles of operation:

1. **Customer interests:** The Bank takes into account the interests of customers by providing high-quality banking products and services.
2. **Feedback:** The Bank takes into account the opinions and suggestions of customers, providing conditions for continuous cooperation.
3. **Information distribution:** Employees provide reliable information about banking services in a timely manner.
4. **Confidentiality:** The Bank respects the confidentiality of customer and employee data.
5. **Ethics:** Employees do not use official information for personal purposes and do not accept remuneration for their duties.
6. **Professional behaviour:** Employees show respect and kindness to customers, increasing their trust.
7. **Equality:** The Bank does not provide unreasonable benefits and privileges.
8. **Response to complaints:** The Bank promptly responds to customer comments and complaints, eliminating violations and errors.

Objectives of interaction with customers:

- **Information distribution:** Transparent communication of information about products and services.
- **Understanding the needs:** Taking into account the expectations and needs of customers to provide effective solutions.
- **Consultations:** Qualified consultations on financial issues.
- **Innovations:** Implementation of customer-oriented innovations to improve the quality of service.
- **Loyalty:** Strengthening customer trust and loyalty through the quality of products and attention to them.
- **Responding to problems:** Timely solution of clients' problems to maintain the reputation of a reliable partner.

Customer focus, availability of financial products and quality of rendered services

GRI 3-3

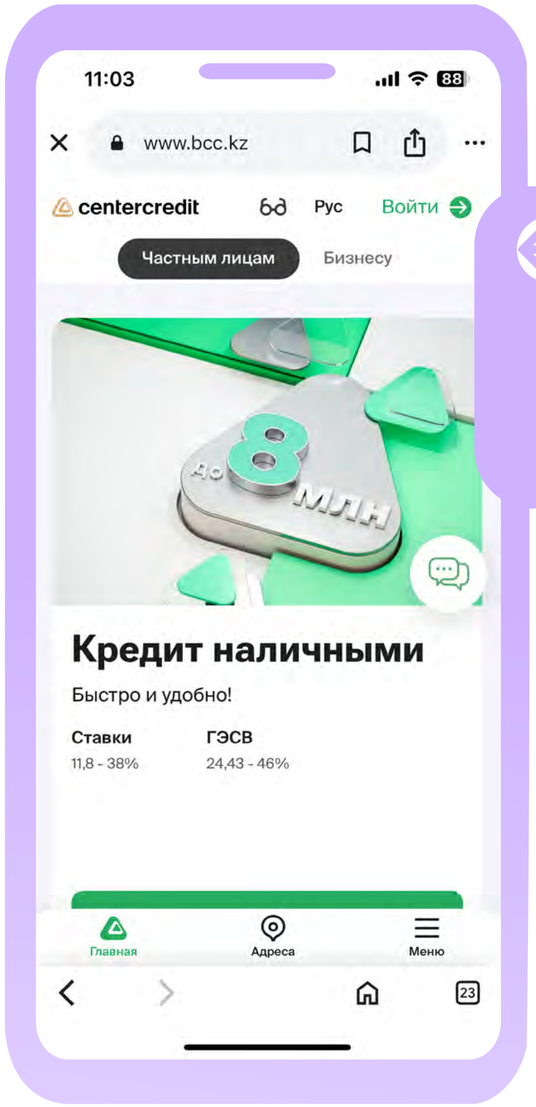
Bank CenterCredit consistently implements its digital transformation strategy, focusing on innovation, convenience and a personalised approach to each customer. The approach is based on the development of unique banking products adapted to the needs of various categories of customers: from children and pensioners to entrepreneurs and investors. Thanks to the introduction of modern digital solutions such as MPaaS and BaaS, the Bank provides a seamless customer experience through a mobile application, online banking and other online channels.

The Bank's customer service is one of its key priorities. The contact center works around the clock and provides free support via short codes:

505 for individuals

605 for legal entities

The support service promptly resolves customer issues, ensuring a high level of satisfaction and trust.



In 2025, Bank CenterCredit took a significant step towards digitalisation of retail financial products, which significantly increased the availability, convenience and speed of customer service. One of the key achievements has been the development of online lending: customers can apply for a loan completely remotely: from applying to receiving funds, through a mobile application or online banking.

The Bank is also actively developing digital investment services. It is now possible to open a brokerage account in 5 minutes without visiting the office. Clients get access to trading stocks, bonds, currencies and derivatives market instruments with minimum fees. A convenient mobile application allows monitoring investments in real time, and analytical materials and specialist support help making informed decisions. In addition, the Bank offers services in the Forex market, including the purchase and sale of currencies at competitive rates, as well as the sale of precious metals in digital format, which makes investments in gold and silver accessible to everyone

For more information about these initiatives, see "Digitalisation of processes to improve the quality of services" section

Bank CenterCredit offers a wide range of bank cards for individuals and legal entities, from premium solutions for travellers and entrepreneurs to specialised products for children and pensioners. Each card is accompanied by modern digital services, cashback, installment payment and the ability to manage funds via a mobile application.

#kartakarta



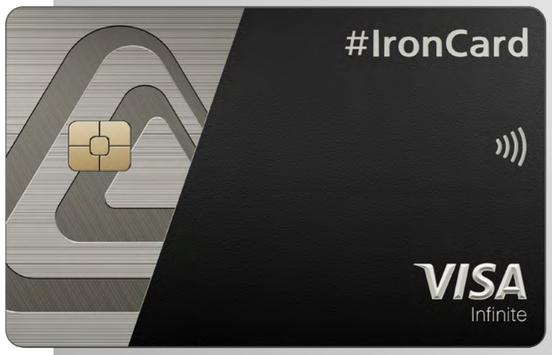
Multifunctional credit card with an interest-free period and the possibility of instalments of up to 12 months from partners without overpayments. Up to 30% cashback, and a credit limit of up to 7 million tenge becomes an ideal tool for large purchases and personal finance management.

#TravelCard



Card for travelers: 4% cashback on tourism and taxis worldwide, 7% on car rental, free business lounges, insurance up to USD 750,000, VIP privileges in hotels and 24-hour concierge service.

#IronCard



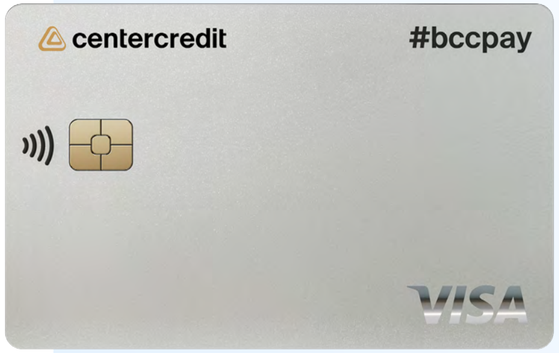
Premium stainless steel Visa Infinite card with up to 4% cashback on all purchases, multi-currency (USD, EUR, RUB, GBP, AED), VIP status in hotels, airport privileges and travel discounts.

#BlackEdition



Premium card with up to 10% cashback in restaurants and on AirbaFresh services, access to business lounges, Fast Track at airports and multicurrency support (KZT, USD, EUR). Up to 60,000 tenge cashback per month.

#BusinessCredit



A credit card for entrepreneurs with a flexible limit, the ability to pay in instalments, cashback on business expenses and convenient management via online banking. An excellent tool for optimising corporate expenses.

#GoldCard



A card for purchases in China with cashback in yuan, free issue and maintenance, multi-currency support and up to 10% cashback. Perfect for frequent trips and online shopping in China.

Bank CenterCredit is aware of its social responsibility and supports non-financial inclusion projects for vulnerable groups of the population.

Bank CenterCredit uses financial technologies to create convenient, simple and fast digital financial services in order to realise the bank's vision of financial inclusion, characterized by low threshold of access, unlimited service and zero delay time.

The purpose of dividing the audience into such groups as teenagers, women receiving alimony, and pensioners is to provide adapted financial services. products and services that meet specific needs and ensure inclusivity for the most vulnerable socio-economic segments of the population.

#SocialCard

It is intended for receiving benefits and social payments from the Government for Citizens State Corporation NGO. More than 40 thousand cards in the bank's portfolio by the end of 2024.

#Alimony card

The alimony transfer card is intended for individuals to receive alimony (money intended for the maintenance of minors and disabled adult children) in accordance with the requirements of the legislation of the Republic of Kazakhstan. More than 2 thousand cards in the bank's portfolio by the end of 2024.

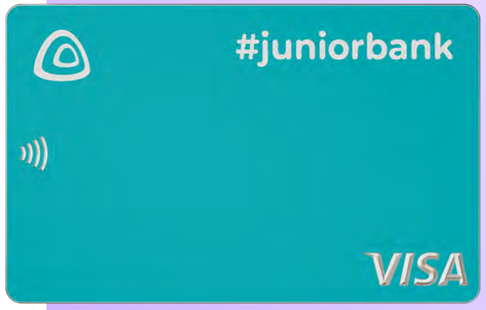
Mortgage program "7-20-25"

The program was developed as part of the implementation of the objectives of the first initiative "New housing acquisition opportunities for every family", announced in "Five social initiatives of the President", the Address of the President of the Republic of Kazakhstan to the people.

"7-20-25" is a social program for citizens of the Republic of Kazakhstan, which provides new opportunities to improve housing conditions for every citizen of Kazakhstan with affordable credit conditions.

The program allows citizens of Kazakhstan to purchase housing on favourable terms: a low rate (7%), a small initial payment (20%) and a long repayment period (up to 25 years). The government supports the program by making mortgages affordable and convenient for a wide range of people. The Bank offers to take advantage of the preferential terms of this program to a wide range of clients who meet the requirements of the program. For comparison, the rate for market mortgage programs is significantly higher and increases the payment burden for citizens of the Republic of Kazakhstan.

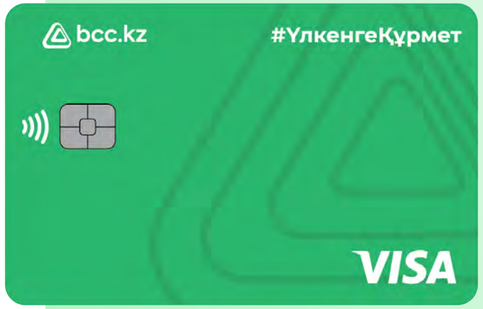
#JuniorBank



The first card is for children and teenagers from 6 to 18 years old. It helps to master financial literacy, manage savings and make purchases under the supervision of parents through the Junior Bank app. More than 55 thousand cards have been opened by the end of 2024. A special feature of this card is the formation of financial literacy skills through gamification. Having successfully completed all the tasks, the child receives a reward confirming the development of financial skills. In addition, the card allows children to request funds from their parents, eliminating the risk of losing cash.

For security reasons, parents can track the geolocation of their children, and children and teenagers can make independent purchases only in permitted categories of goods under the age of 18, receiving increased cashback.

#ÜlkengeQurmet



Pension card with 3% cashback on pharmacies and 2% on groceries, free service, SMS notification and 24/7 support. It was created for the convenience and care of the older generation. More than 50 thousand cards in the bank's portfolio by the end of 2024.

Bank CenterCredit case

Kazakhstan's first syndicate to support capacity expansion of RG Brands

In 2024, Bank CenterCredit, in cooperation with Development Bank of Kazakhstan JSC and Nurbank JSC, became part of a historic event: the first syndicated financing transaction in the country. A special feature of Bank CenterCredit's participation was the performance of the functions of an agent bank, which implied the coordination of the syndicate's creditors and the provision of credit administration services. Under the leadership of Nurlan U. Shegebaev, who headed the corporate unit team, a new product for the administration of syndicated loans was developed and implemented. This step has opened up new opportunities for financing large corporate projects, contributing to the development of key sectors of the economy and strengthening the position of local companies.

#WomenInBusiness

The bank's participation in the EBRD's Women in Business program promotes access to finance for women entrepreneurs. According to the Bureau of National Statistics, women earn less than men in almost all economic spheres and professions, with very few exceptions (the wage gap is 26.5% by the end of 2023). According to the UNDP, women are underrepresented in leadership positions, accounting for only 11% of executives in Fortune 500 companies. From 2018 to 2024, the program provided more than 700 loans to women's business entities.

Non-financial support projects

Adapting businesses to a sustainable future

In 2024, Bank CenterCredit organised a special seminar for corporate clients on topical issues of sustainable development and ESG principles. The event, held jointly with Ernst & Young, the international consulting company, brought together about a hundred representatives of large and medium-sized businesses.

The Bank's speakers revealed the specifics of their ESG strategy, including a climate strategy and the first sustainability report. Ernst & Young specialists discussed the best global sustainable business practices and the prospects for ESG innovation. The forum provoked a great response among the participants: clients actively shared their own cases and asked questions about the methods of implementing ESG principles. Most of the participants expressed satisfaction with the quality of the event and admitted that it helped to rethink the approach to their business, focusing on sustainable development.



Initiatives on the SME block can be found in the "Support for small and medium-sized businesses" section.

The Bank's inclusive products

As part of the Digital Inclusion project, our Bank was the first to introduce sign language translation services in its branches to serve clients with disabilities (people with disabilities and people with limited mobility). Now, customers with hearing and speech impairments can receive banking services with the support of a sign language specialist.

The adaptation of the mobile application and website with the Videobanking system continues to introduce the practice of conducting online video consultations, which will increase the accessibility and convenience of services for customers with hearing and speech disabilities. It is planned to launch an electronic queue with the connection of a sign language interpreter for customers contacting Bank branches.

In addition, measures have been taken in some of the bank's branches to increase the availability of ATMs for people with limited mobility and the disabled:

- For the convenience of use by people in wheelchairs, the height of the ATM row has been reduced by removing the legs.
- Headphone jacks are installed, allowing visually impaired users to hear voice instructions.
- Special labels with Braille script have been pasted on to help people with visual problems navigate the surface of the device.

At the beginning of 2025, more than 150 branches of the bank in all regions of its presence have been adapted to people with disabilities. These measures contribute to the creation of a comfortable and accessible infrastructure for users with special needs.

Feedback and consultation mechanisms

GRI 2-25, 2-26, SASB FN-CB-510a.2

The Bank adheres to the principles of responsible business conduct in all aspects of its activities, including in relationships with stakeholders. In this regard, the Bank has developed a mechanism for submitting, reviewing appeals and complaints from external and internal stakeholders, through which everyone can report their concerns about possible or current violations. This mechanism, supported by accessible and effective communication channels, ensures the Bank's prompt and adequate response.

Any person can report possible violations, as well as receive additional information and ask any questions that arise through any of the proposed communication methods:

- via a single channel for appeals for individuals **(505);**
- by sending a message to **info@bcc.kz;**
- by applying at the Bank's branches.

The Bank's employees can use the following communication methods to report possible violations:

- **hr@bcc.kz:** receiving non-anonymous requests for questions from employees;
- **The Rescue Service** is an anonymous referral channel (accessed via a link on the corporate mail and in the bank's internal messengers).

When reviewing applications, the Bank guarantees confidentiality.

The Compliance Control Unit in the Bank analyses customer complaints (statements) for compliance risk, and also conducts inspections independently or jointly with the Bank's structural divisions and officials on violations by the Bank's employees of the legislation of the Republic of Kazakhstan, in accordance with the procedure defined by the Bank's internal document.

The Bank undertakes to provide timely and complete responses to customer complaints, as well as to eliminate the causes resulting in these complaints. This practice is part of the Bank's goal to improve the quality of service and increase customer satisfaction, thereby maintaining transparent and open relations with customers and ensuring a high level of corporate responsibility.

The Bank and the process participants are informed about changes and improvements in the complaint handling process, including the development of dynamic dashboards for customer requests in terms of products, processes, channels, and types of requests. Registered customer requests are processed in Kazakh, Russian, and English languages. Customers have the opportunity to leave complaints at any time via any available communication channel. BCC strives to treat every request with due attention and professionalism, up to 90% of clients receive responses to oral requests within one day.

There were no violations of human rights and discrimination in the reporting period.

The Company regularly conducts Customer Satisfaction Analysis (CSA) and Voice of the Customer (VOC) studies, which allow to assess customer satisfaction and collect their feedback on the Bank's work. The average score of VOC clients for 2024 was 4.75 out of a possible 5 points, 4.74 for the block of retail clients, and 4.77 for the block of legal entities and individual entrepreneurs.

The Bank is interested in receiving an objective assessment from customers and is working to expand customer coverage with a survey of satisfaction with products, services, and customer care through six channels.

Directions	2023			2024		
	Number of requests	Numbers of assessments	RR (response rate)	Number of requests	Numbers of assessments	RR (response rate)
Bank	4,936,865	856,084	17.3%	11,229,962	3,405,815	30.3%
Retail customers	2,776,582	539,310	19.4%	8,521,588	2,943,269	34.5%
Legal entities and entrepreneurs	2,160,283	316,774	14.7%	2,708,374	462,546	17.1%

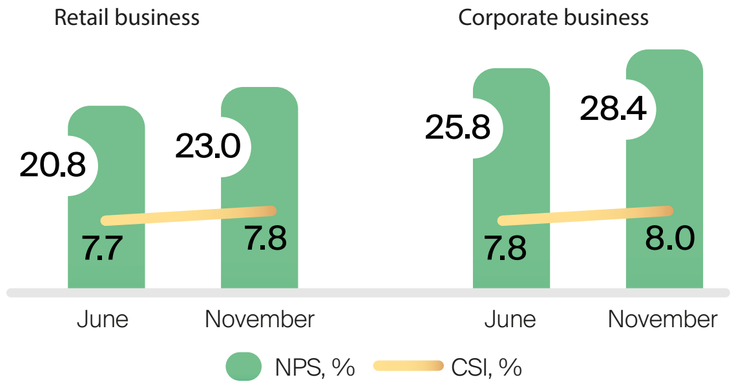
Additionally, the bank evaluates customer satisfaction with the operation of our ATMs, as well as information and payment terminals. The Company evaluates the average indicator separately for ATMs and terminals, as well as the overall value for the division. This average indicator is taken into account in the performance assessment (KPI) of the departments responsible for ATM/TCO development. According to the results of the 4th quarter of 2024, the VOC indicator was 4.89, which corresponds to the target value of the indicator. Thus, we try to maintain a high level of customer satisfaction with our devices.

The results of these studies are used to further improve products, processes, and services.

In 2024, the Bank also conducted surveys using methods for determining the Net Promoter Score (NPS) and Customer Satisfaction Index (CSI). The surveys covered two key segments: retail business; mass business, including individual entrepreneurs, limited liability partnerships, NGOs, state-owned enterprises and joint-stock companies.

To ensure reliability and relevance, the surveys were conducted in two stages: in June and November 2024. This allowed to assess changes in CSI and NPS over the course of the year.





The Bank's Management Board approved an internal document "Regulations on the Internal Communication System in JSC Bank CenterCredit", which defines the procedure for ensuring confidential communication by the Bank's employees (including anonymous ones) about violations related to the Bank's activities, internal regulatory documents of the Bank and the legislation of the Republic of Kazakhstan. Persons who have relevant information about violations have the right to report the violation to one of the Bank's authorised persons listed above: members of the Board of Directors, the Bank's President and/or members of the Management Board, or the Chief Compliance Officer. Upon receiving information about an incident/violation/risk, these persons should take possible measures to ensure the confidentiality of the person who reported the violation. The Bank guarantees that no measures of influence will be applied to employees who have reported their concerns or suspicions in good faith. As a result of the audit, the information is communicated to the Management Board in writing (an internal memo), and is also communicated to the Board of Directors by being reflected in the periodic reports of the Compliance Service to the Board of Directors. In 2024, there were no such reports from the Bank's employees to the Compliance Service, nor were they transmitted to the Compliance Service for verification from the bank's management and executive bodies.

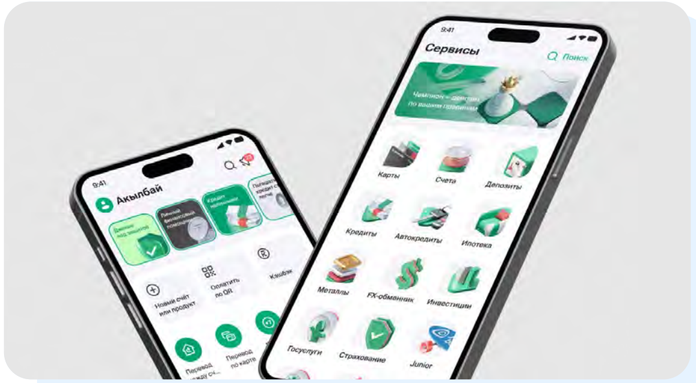
A key element of the complaints management system is the regular informing of the Bank's management about incoming complaints. Reports on complaints are compiled and provided to the management on a monthly basis. In addition, based on the analysis of these reports, an action plan is developed and implemented quarterly, aimed at reducing the number of complaints and improving the quality of products and services provided.

The Bank attaches great importance to the continuous improvement of the complaints handling process. Regular analysis and evaluation of the effectiveness of complaint handling mechanisms allow the Bank to make necessary changes and improvements to ensure a faster and better resolution of the Bank's customer issues. In this context, the Bank also regularly reviews proposals from stakeholders to optimise the complaints handling process and mechanism. This includes optimising the systems used in accepting and reviewing complaints, as well as reducing complaint processing time. Feedback from customers and employees of the Bank is the basis for continuous improvement of work and improvement of service standards.

Digitalisation of processes to improve the quality of services

IFRS S1

In a rapidly changing world and the increasing role of digital technologies, the Bank sets an ambitious goal to create a modern digital ecosystem combining traditional banking services with innovative digital solutions. Deep digitalisation of all areas of activity, aimed at increasing the accessibility and convenience of customer service, is the central focus of the current strategy, which allows the Bank to remain competitive and meet the expectations of the most demanding audience.



BCC 4.0 Mobile app

The key event of 2024 was the large-scale digital transformation of the Bank, marked by the launch of the BCC mobile application version 4.0. The new application has a number of advantages:

- Personalised interface design and intuitive navigation.
- Convenient access to the management of banking products: cards, deposits, transfers, payments.
- Built-in services for investing and trading stocks, buying and selling precious metals.
- The possibility of obtaining loans and purchasing goods through the BCC Mall platform.
- Access to public services to simplify bureaucratic procedures.

The launch of the mobile platform provided quick access to digital services and resulted in a significant increase in customer engagement.



Online lending

In 2024, the Bank completed the digitalisation of the entire range of retail credit products, launching convenient platforms for online loan applications. Among the achievements there are:

- An online application processing service for consumer loans, mortgages and car loans has been launched.
- Partnership with the developer BI Group made it possible to apply for mortgage loans online.
- The number of online loans has increased many times: auto and mortgage loans have reached record volumes.



Sales of precious metals

Digital transformations have also affected the sphere of investments in precious metals. Now users can:

- Buy gold bars and coins online through the official website BCC.kz .
- Use the convenient option of deferred purchase of metal with the possibility of notification of a price reduction.

This functionality contributed to a 30% increase in sales of precious metals.



Forex and brokerage activities

Forex and brokerage services have undergone significant improvements:

- The Deferred Transactions Service is now available for up to five days.
- A news block from the BCC Invest investment division has been added, which allows to track current events in the financial markets.
- It is now possible to open brokerage accounts in foreign currency and automatically transfer funds through FX-Exchange.

These innovations have led to a significant increase in the number of active brokerage accounts (+85%) and trading volume on the stock exchange (+235%).



KASE Global Platform

A new round of development has occurred in stock trading. The KASE Global project was launched, providing clients with access to a wide range of foreign stocks and investment products. Key points:

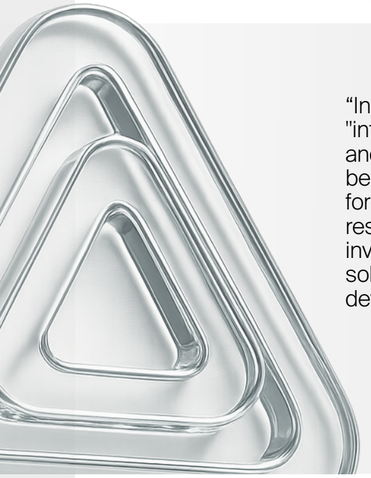
- Access to the Investment Fund (interval mutual fund) working with foreign assets has been opened.
- Profitability indicators are published daily, which enhances transparency and customer trust.

Digitalisation results

Large-scale digital transformation efforts have yielded tangible results:

- The total increase in the loan portfolio of private clients amounted to +33%, reaching 2.4 trillion tenge.
- The growth rate of car loans was +41%, consumer loans – +34%, mortgages – +29%.

Sustainable solutions based on artificial intelligence



"In 2024, we took a confident step towards an "intelligent bank", i.e. sustainable, customer-centric and technologically mature. Artificial intelligence has become not just an automation tool, but a catalyst for change, allowing us to scale the value of data and respond faster to market challenges. We continue to invest in AI and data as a strategic asset, creating a solid foundation for long-term growth and sustainable development."

Vice President of Data Management and Retail Risk Management

Rubina D. Lozovaya

In 2024, the Bank's Board of Directors approved an AI Development Strategy, which includes four key areas of implementation, as part of the overall strategy:

1. Customer centricity, hyperpersonalisation, and quality sales: growth of an active customer base through modelling for recommendation systems.
2. Socially responsible sustainable business model: focus on reducing credit fraud and increasing collection efficiency by enriching audio data and Computer Vision models.
3. Intelligent digitalisation: focus on reducing operating costs and increasing STP (Straight Through Processing) through the introduction of text, audio and video data processing services.
4. Centralised AI as a driver of competitive advantage: the focus is on technological development, ethical and smooth operation of AI services through the development of a general banking AI platform.

The key goal of the AI Strategy is the transition from experimental implementations to systemic transformation: to institutionalise AI as the core of the Bank's business model. For this:

- Scale the current ML platform to a technology platform for all AI models
- Continue to integrate AI into key business processes: a 50% increase in the level of intelligent digitalisation (AI STP)
- Improve the efficiency of data-driven decision-making
- Increase the speed and personalisation of customer service
- Ensure risk control, ethics, and transparency of AI solutions

The model of centralised development of all AI tools has been approved as part of the strategy. It is implemented in the office of the CDO (Chief Data Officer) and is aimed at effective centralised allocation of resources, reuse of developments, technological unification and control of operational and ethical risks.

The evolution of AI in the Bank (2020-2024)

Since 2020, the Bank has gone from basic neural networks for scoring and anti-fraud to modern convolutional and recurrent models of computer vision, voice robots, speech and text analytics. In 2024, the introduction of AI agents based on transformers began, including LLM solutions for chatbots and virtual assistants.

The impact of AI on the sustainable development of products and services

Implemented AI projects are focused on improving quality sales and fraud prevention:

- The introduction of deep learning models has resulted in a 3-5-fold increase in sales
- The share of overdue debt (NPL 90+) is 0.9%
- The level of fraud has been reduced by 5-8 times, according to FCB data: the lowest fraud rate in retail lending on the market
- The introduction of OCR and Computer Vision resulted in a 30% increase in sales and a 27% reduction in fraud
- MVP Photoscoring demonstrated a 32% reduction in social engineering fraud

Sustainable development of relationships with clients and employees

AI projects promote respect for human rights, protection of personal data and improvement of working conditions:

- Virtual Assistant has reduced the burden on chat operators by 25%; by the end of the third quarter of 2025, it is planned to reach 65% through scaling the LLM model
- The use of voice robots has reduced operating costs by more than 30% and reduced communication time with the client by 40% while maintaining efficiency
- Using AI to support employees: HR assistant, AI translator, intelligent prompter, customer comment analysis, classifier of negative customer reviews.
- Development and implementation of a data anonymisation service that masks personal information.
- Using encryption with your own keys at all stages of data transmission, storage and processing in the cloud.

Prevention of bias and compliance with ethical principles

The following measures have been implemented to reduce the risks of discrimination and enhance the fairness of models:

- High-quality and balanced data collection, including the regulation of observation classes and the use of synthetic data
- Ethical processing of datasets: balancing by gender, diversity of voices, inclusiveness of examples
- Regular updating of training samples
- Taking into account cultural differences and preventing the perpetuation of stereotypes

AI management: policy, control and risk management

AI is regulated by MLOps internal procedures, regulations on personal data and information security. In the 3rd quarter of 2025, the following documents will be approved:

- AI Application Policy
- The AI Committee to ensure the centralisation of governance, respect for the principles of legality, transparency, fairness, controllability and protection of human rights

AI control covers four risk categories:

1. Ethical risks
- Data preparation and validation
- Explicable AI, quality control tools, LLM-as-Judge, post-analysis of metrics.
2. Technical risks
- A/B testing, sustainable learning, data protection, anomaly monitoring.
3. Operating risks
- Architecture, fallback tools, regular validation, user training.
4. Regulatory risks

Legal expertise, compliance with regulatory requirements, and compliance audit.

Participation of the Bank's CDO in international forums: exchange of experience in AI data and digital solutions

- Digital Almaty 2025 International Forum. Panel session: Gender Biased AI.
- The 4th International Space Forum "Digital Kazakhstan" 2024. "The main trends of fintech" session AI is the base for a modern remote banking service.
- Be Woman 2024 International Forum. Session: "The price a woman pays in business."
- DAMA Kazakhstan 2024 International Forum: Data Governance, a new corporate feature. "The impact of AI on data management" session.



Ensuring data security

GRI 3-3, 418-1, SASB FN-CB-230a.1, SASB FN-CB-230a.2, SASB FN-CF-220a.2

The Bank strictly adheres to the legislation of the Republic of Kazakhstan on personal data protection and attaches the utmost importance to confidentiality issues. An organisation has a comprehensive set of mechanisms, procedures, and policies in place to ensure the security of customer information.

Internal rules for handling confidential information have been developed and approved, including data classification and mandatory requirements for all employees and departments. These rules cover the entire life cycle of personal data, from collection and storage to transfer and destruction. Special attention is paid to the differences between physical and digital formats, which provides reliable protection regardless of the form of storage.

The collection and processing of personal data is carried out strictly within the framework of specific, predefined and legitimate purposes described in the subject's Consent form for the collection and processing of personal data published on the official website **bcc.kz**

Regulatory and legal documents of the Bank in the area of information protection and confidentiality of personal data:

- Personal Data Management and Protection Policy of JSC Bank CenterCredit
- Rules for Ensuring Information Security of Cloud Technologies at JSC Bank CenterCredit
- Rules for Ensuring Information Security of Network Infrastructure at JSC Bank CenterCredit
- Rules for working with protected information at JSC Bank CenterCredit

Bank CenterCredit considers personal data protection as a priority and integrates appropriate mechanisms into the internal control system. To ensure compliance with best practices and regulatory requirements, the Bank annually initiates an independent review of the effectiveness of its approaches to information protection.

Data protection organisation

SASB FN-CB-230a.2

The Bank protects clients' personal data from any illegal actions, including unauthorised access, modification, disclosure or destruction. For this purpose, comprehensive security measures are applied: from physical protection of servers and equipment to improving the IT infrastructure and countering cyber threats such as phishing, hacker attacks and other incidents.

In 2024, a specialised Directorate for the protection of personal data was established, the main task of which is to strengthen control over compliance with confidentiality standards and increase trust on the part of customers and stakeholders.

Information security issues are supervised at the highest level, personally by the President of the Bank. Under their leadership, the Information Security Center operates, which is responsible for the development and implementation of legal, organisational and technical data protection measures.

All requests from customers and employees related to the protection of personal data are processed centrally through an internal system. In case of a potential breach of confidentiality, an operational check is carried out, and the incident is recorded in the operational risk database. Clear deadlines have been set: information about such incidents must be registered within three business days.

To reduce risks, the Bank regularly trains employees to work with personal data. Training is mandatory and is conducted at least once a year, followed by testing.

Technical and administrative data protection measures are regularly updated. Among them are the signing of non-disclosure agreements, the delimitation of access to information, as well as periodic professional development of employees in information security.

Business continuity, information technology and information security management system

The Bank has established and operates an effective business continuity, information technology and information security management system. Cybersecurity is monitored by the Chief Information Security Officer (CISO) of the Information Security Center. Internal regulatory documents, operational processes and mechanisms governing the formation and management of the Bank's business continuity, information technology and information security system ensure the availability of a business continuity, information technology and information security risk management system that corresponds to the external operating environment, strategy, organisational structure, volume of assets, nature and level of complexity of the Bank's operations and ensures minimisation of business continuity risks, information technology and information security. These systems are aimed at ensuring uninterrupted operation of the Bank's processes at the proper level and providing services and products to the Bank's customers/partners/subsidiaries and other stakeholders, regardless of the current state of the Bank and throughout the calendar year.

The tasks of ensuring the Bank's business continuity, information technology and information security, which are implemented to achieve the goals specified in the internal documents, include:

- Ensuring that the Bank performs critical activities (processes) at the minimum acceptable level in the face of unforeseen circumstances.
- Development and implementation of measures to reduce the severity of the consequences of violations of daily functioning.
- Ensuring the safety of the Bank's employees and customers/visitors in the face of unforeseen circumstances.
- Ensuring interaction with key business partners, contractors, suppliers and other stakeholders.
- Review of business continuity/contingency plans and procedures for responding to information technology and information security incidents throughout the calendar year.
- Ensuring compliance of all mechanisms of the business continuity management and information security system with the requirements of the current legislation of the Republic of Kazakhstan, regulatory legal acts regulating banking activities, and the requirements of other authorised state bodies for regulation and supervision of the financial market and financial organisations.

The above processes and mechanisms are regulated in accordance with the requirements of the PCI DSS (Payment Card Industry Data Security Standard) International Security Standard, which defines the requirements for the protection of payment card data, the SWIFT Security Framework of the international system of interbank payments and SWIFT data exchange, the recommendations of the Basel Committee on Banking Supervision, in terms of continuity management activities and regulatory legal acts of the Republic of Kazakhstan

The Bank has implemented and formalised the process of raising awareness among the Bank's employees through the periodic launch of various testing practices to prepare for trending threats. At the senior management level, an independent director, Mr. Werner Claes, received external training in cybersecurity.

Violations and liability

GRI 418-1, SASB FN-CB-230a.1; SASB FN-CF-220a.2

All employees and third parties who have access to confidential information are personally responsible for compliance with the legislation of the Republic of Kazakhstan and the internal regulations of the Bank.

By the end of 2024, the Bank has not recorded any confirmed incidents related to leakage, theft or loss of personal data, which indicates the effectiveness of the security measures applied.

Approach to interaction with customers

GRI 2-29, 204-1

The bank's work with suppliers is a key factor in the success of its business. A competent partner selection strategy and productive interaction contribute to the development of the organisation and reduce potential threats. The supplier selection process is carried out through careful compliance with established procurement procedures. The main selection criteria include ensuring a fair competitive environment and providing equal opportunities to all participants in the process.

The main principles of the bank's cooperation with external suppliers are as follows:

- strict compliance with the legislation of the Republic of Kazakhstan regulating activities in procurement;
- strict compliance with the norms and requirements of the bank's internal regulatory documents defining the procedure for relations with suppliers and contractors.

Objectives of cooperation with suppliers and contractors

GRI 418-1, SASB FN-CB-230a.1; SASB FN-CF-220a.2

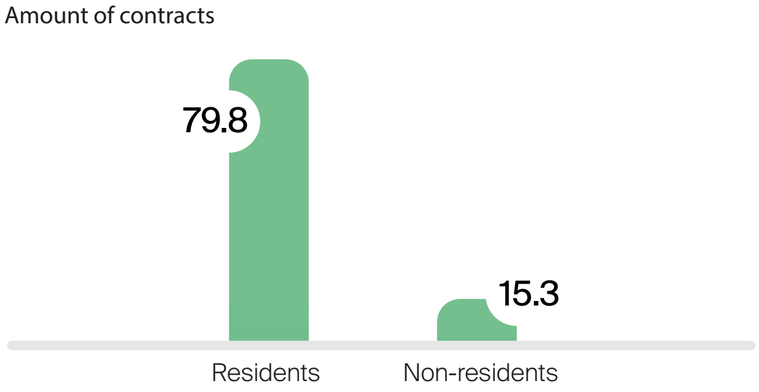
The basis for the successful functioning of the bank is competent interaction with suppliers, ensuring the fulfilment of key principles:

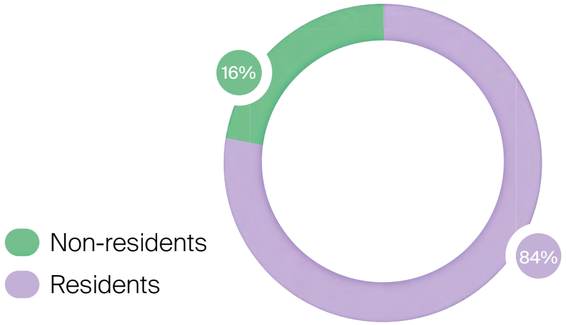
- **Contractual discipline:** suppliers and the bank are obliged to strictly follow established contracts — to comply with deadlines, volumes and quality of supplies / services. Non-compliance with the requirements entails liability in accordance with the agreement and the laws of the Republic of Kazakhstan.
- **Timely delivery:** The Bank is counting on the prompt receipt of all necessary resources to maintain stable and efficient operations.
- **Social and environmental responsibility:** The Bank actively supports responsible business conduct among suppliers, including protection of employees' rights and environmental protection. In cases of violations, an open dialogue is possible to find a mutually acceptable solution.

Local enterprises of Kazakhstan acted as the main partner of the bank. The total value of all contracts with residents and foreign companies amounted to

95.1 billion tenge.

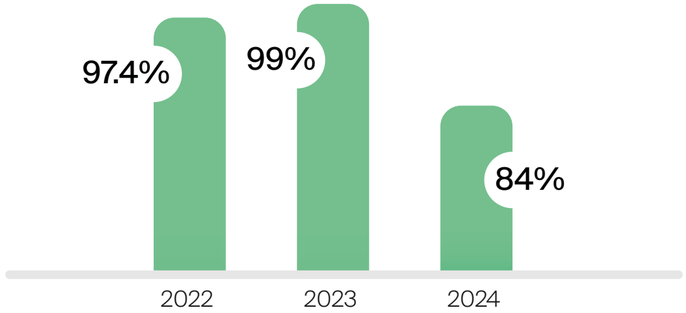
The amount of contracts in billion tenge for residents and non-residents of the Bank's suppliers, as well as their percentage share



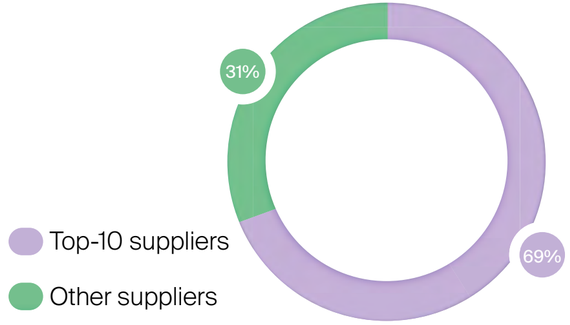


Contracts concluded with the top 10 suppliers of JSC Bank CenterCredit account for a significant share in the structure of contracts, accounting for 69% of the total volume of purchases.

Share of purchases from local suppliers



The share of the top 10 suppliers from the total amount of contracts



Supply chain management and procurement policy

GRI 2-6, 2-24

The Bank takes a responsible approach to building relations with partners in the supply chain, adhering to the regulations of the Republic of Kazakhstan and its own regulations for interaction with counterparties. The Bank is interested in cooperating exclusively with suppliers whose business practices comply with the requirements of the current legislation of Kazakhstan, international procurement guidelines, standards of business conduct and integrity, and are focused on employee health, environmental protection, and respect for human rights.

Supply chain management system

GRI 2-6, 2-24

The document according to which the procurement process is performed:

- Regulation on the acquisition of fixed assets, intangible assets, inventory, works/services of JSC Bank CenterCredit.

The Bank cooperates with a wide range of suppliers, among which special attention is paid to owners of commercial real estate, companies providing a variety of services from maintenance to advertising, construction organisations, as well as suppliers of various goods and materials for the needs of the bank. A significant proportion of partners in the information technology segment are foreign companies offering specialised IT solutions and educational programs.

The main types of participants in the supply chain include:

- Real estate owners or subtenants
- Performers of works and services who may involve third-party specialists to implement projects
- Suppliers of products that are either manufacturers or dealer distributors

The Bank's success largely depends on well-established communication with companies such as IT firms, outsourcing providers, advertising and marketing agencies. The Bank prefers to establish long-term partnerships by signing contracts for one year or longer, especially with property owners.

When interacting with a supplier, strict compliance with environmental standards, regular quality control of the services provided, and reliable reporting are important. The Bank's main requirements for partners include:

1. The organisation is obliged to monitor the waste recycling process and wastewater treatment, ensuring proper handling in accordance with the legislation of the country.
2. The supplier company must strictly comply with the rules for the safe storage and transportation of potentially harmful substances and chemicals, ensuring the safety of its products.
3. The availability of ISO 14001 certificate confirming the implementation of an effective environmental quality management system is considered by the bank as an advantage.
4. Encouraging suppliers to monitor greenhouse gas emissions and take measures to reduce their carbon footprint.
5. It is advisable to implement environmental sustainability strategies, support initiatives to improve environmental protection, and promote environmentally friendly solutions throughout the production process.

In addition, the Bank's partners are required to strictly comply with the legislation of the Republic of Kazakhstan, comply with high standards of corporate ethics and protect human rights. Any discrimination in employment relations is prohibited, including discrimination based on gender, age, nationality, religion, health status, marital status, political beliefs, and other grounds. Violence, forced labour, and exploitation of children are prohibited.

Evaluation of management effectiveness in procurement management

BCC applies different procurement procedures depending on the size of the transaction. For purchases worth less than 100 monthly calculation indices (MCI), it is enough to submit additional commercial offers or screenshots from the website, allowing to make a price comparison and choose the best option. When the purchase amount reaches the range from 100 to 200 MCI, the contract is concluded based on a comparison of at least three commercial offers from different companies. If the purchase amount varies between 200 MCI and 20 million tenge (or the equivalent in US dollars), the transaction is executed through an electronic auction on specialised trading platforms without involving a tender commission. Finally, if the threshold of 20 million tenge or a similar dollar value is exceeded, the decision is made officially at a meeting of the tender commission, which ensures openness and strict compliance with all established procedures.

Tender process and supplier survey

The Bank developed centermarket.kz, a specialised banking portal for making purchases. Suppliers register on the portal and participate in tenders by submitting relevant commercial proposals. The procurement process is organised in such a way that different methods of supplier selection are used:

- **The classic method** is the most common method involving an open tender for the supply of certain goods or services.
- **Qualification selection method** is used to systematise regular purchases of specific goods, works or services by concluding a framework agreement with pre-selected suppliers.
- **Price-List Purchase** involves requesting up-to-date price information from potential suppliers for a given list of goods, works, or services.

The successful b idder is determined after a detailed review of all submitted documentation for compliance with the Bank's terms of reference. The procurement procedure is conducted publicly and transparently.

In 2024, Bank CenterCredit conducted a selective ESG assessment of its suppliers. The questionnaire covers a wide range of issues related to environmental and social impacts, such as the environmental management system, water consumption, atmospheric pollution, land use, climate change, working conditions and industrial safety, human resources, social protection, human rights and interaction with the local community. Based on the results of the assessment, no violations or negative results were identified, which indicates a high level of responsibility and stability in the Bank's supply chain. This approach helps to strengthen partnerships and maintain sustainable development standards in business practices.

During 2024, there were situations when suppliers opposed the results of tenders, considering them unfair. However, the Bank reserves the right to independently select partners based not only on the value of the contract, but also taking into account other factors such as reliability of fulfilment of obligations, product quality and delivery time. In case of disputes, the Bank sends detailed letters to the participants explaining the reasons for making a decision in favour of another bidder.



centercredit
2024 Sustainability Report

Message from the Chairman of the Board of Directors

Message from the President

1. About the Report
2. Corporate governance
3. Bank's contribution to achieving UN Sustainable development goals
4. Respect for human rights, business ethics and anti-corruption
5. Interaction with customers and suppliers

6. Interaction with personnel

6.1. Management approach

6.2. Incentive system, recruitment and training of personnel

6.3. Social support

6.4. Occupational health and safety

6.5. Development Plans

7. Responsibility to society
8. Environmental responsibility

Annexes

Interaction with personnel

GRI 2-7, 2-8, 2-23, 2-29, 2-30, 3-3, 201-3, 401-1, 401-2, 401-3, 402-1, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-8, 403-9, 404-1, 404-2, 404-3, 405-1, 405-2, 406-1

Key indicators

100%

of the employees received an efficiency review and career development

53%

of senior staff are women

61%

of hired employees are under 30

66.3%

are women

The Bank's key regulatory documents governing management and interaction with staff

- Corporate Governance Code of JSC Bank CenterCredit
- Corporate Governance Code for employees of JSC Bank CenterCredit
- Personnel policy of JSC Bank CenterCredit
- Human Rights Policy of JSC Bank CenterCredit
- Policy on remuneration of employees of JSC Bank CenterCredit
- Regulation on recruitment and adaptation of personnel of JSC Bank CenterCredit (amended in 2024)
- Regulation on corporate values of employees of JSC Bank CenterCredit
- Regulation on organisation of training and advanced training for employees of JSC Bank CenterCredit

7,692

employees[15]

1,441

is the average number of man-hours worked

Management approach

GRI 2-7, 2-8, 2-29, 2-30, 3-3, 402-1, 405-1

The main key to the success of JSC Bank CenterCredit is a cohesive team of highly qualified and dedicated specialists who play a key role in achieving strategic goals and maintaining the company's sustainable development. The Bank creates optimal conditions for the professional development of each employee by offering a variety of tools for their personal and career growth, including effective performance assessment and professional development systems. This approach creates an atmosphere of fairness and confidence in career prospects. Additionally, the bank implements social support programs, providing competitive rewards and benefits, which strengthens loyalty and allows to retain valuable personnel. HR management is based on the principles of mutual respect and recognition of each employee's contribution as an important long-term investment.

The bank's strategic approach to human resource management is combined with the necessary flexibility, which allows it to respond promptly to changes in the economic environment. The process of working with personnel is organised consistently and systematically: the necessary methods are developed, needs are diagnosed, and the results of implementing new practices are regularly evaluated. Department heads actively participate in the management of their teams and work closely with the overall management and evaluation system, which strengthens the link between management and the team.

Bank CenterCredit aims to create a stimulating environment where every employee has the opportunity to realise their potential. For this purpose, the Bank conducts retraining programs aimed at improving the efficiency of work processes and adapting to the dynamic needs of the organisation. Support of the team spirit remains to be an important task both within departments and at the level of the entire Bank, which contributes to the formation of common corporate values and strengthening internal communication, leading to high collective results.

Every year, the Bank organises a large-scale event, BCC Qurultay, which brings together employees of all branches to discuss key achievements and plans for the future. This event also becomes a platform for awarding the best employees, whose work and contribution to the Bank's activities deserve special attention and appreciation. Thus, the HR management system plays an important role in strengthening the Bank's leadership position in the market, while simultaneously providing employees with opportunities for self-realisation, feeling their importance and making a meaningful contribution to the common cause.

[15] The list of employees as of 31.12.2024

Interaction with a team of employees

GRI 2-29, 2-30, 402-1

The goals of interaction with the staff are aimed at:

- Ensuring transparency: regularly informing employees about the strategic goals, the results achieved and the role of each employee in the overall success of the Bank. This helps employees realise the importance of their personal contribution to the development of the organisation.
- Talent retention: strengthening the employer's brand through the creation of an attractive corporate culture and comfortable working conditions. As part of this goal, the Bank offers competitive salaries, bonuses, training and development programs, and maintains healthy and safe working conditions.
- Problem identification and resolution: continuous monitoring of employees' needs and difficulties to maintain a balanced work environment. For this purpose, regular surveys are conducted, feedback channels such as an open door system are organised, and staff support programs are implemented.

Initiatives aimed at improving labour relations and protecting the interests of employees.

The Conciliation Committee. The BCC has a permanent Conciliation Committee that ensures effective resolution of labour conflicts and compliance with labour relations standards. This structure functions both in the head office and in regional offices, consisting of equal parts of employee representatives and management. In 2024, three Committee meetings were held, none of which dealt with discrimination issues; all pending cases were settled in accordance with the law of the Republic of Kazakhstan. The members of the Committee annually undergo training in labour law and negotiation, improving their competence in the area of labour dispute resolution.

Trade union organisation. The Bank has a successful trade union organisation dedicated to protecting the rights and interests of employees. Participation in the trade union involves a monthly contribution of 200 tenge, which entitles to actively participate in its activities. The main task of the Trade Union is to represent the interests of employees in negotiations and collective dialogues, including through active participation in the work of the Conciliation Committee.

The trade union organisation in JSC Bank CenterCredit plays a key role in protecting the rights and interests of employees. It has the right to propose changes to the Collective Agreement, participate in its discussion and approval. The organisation distributes benefits to its members, providing support in important life situations. The trade union serves as an important channel for social dialogue between management and staff, contributing to the building of fair and sustainable labour relations.

The collective agreement, developed in accordance with the legislation of the Republic of Kazakhstan, establishes the basic social and labour standards in the Bank. This document establishes the mutual obligations of the employer and employees, defining the general rules of interaction. The agreement was developed jointly with the Trade Union organisation and entered into force after its approval. It covers all members of the Trade Union, representing their interests.

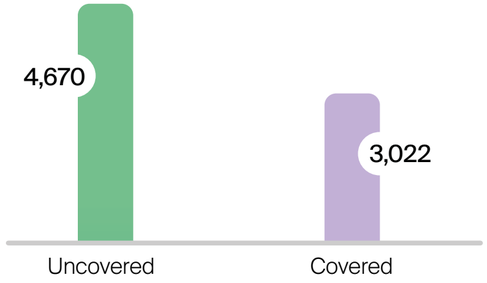
Membership in a trade union provides employees with additional social guarantees stipulated in the collective agreement. In particular, trade union members are provided with a 10% discount on some health resorts in Kazakhstan, financial assistance to Trade Union members and their close relatives in case of severe illness, partial compensation for losses caused as a result of natural disasters (fire, flood, etc.). These measures contribute to creating more favourable working conditions, maintaining a balance between work and personal life, as well as strengthening the social security of employees. In accordance with the provisions of the collective agreement, the Bank undertakes to provide Employees with an additional paid leave of three calendar days in the following cases:

- Birth of a child
- Marriage (the first marriage)
- Death of direct relatives (parents, spouse, children, brothers, sisters)
- If the Employee is a victim of a fire or natural disaster

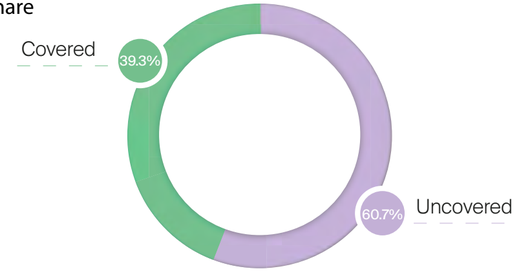
The effectiveness of fulfilling the terms of the agreement is monitored by a special committee. During the negotiations, the parties have the opportunity to put forward their demands and proposals within the framework of the law, which allows creating fair conditions for protecting the interests of all participants in the process. The signed Collective Agreement guarantees the fulfilment of rights and obligations, strengthening the stability of labour relations. In 2024, the contract covered 3,022 employees, which accounted for 39.3% of the total number of Bank employees. The working conditions not included in the contract are regulated by separate agreements.

The number and proportion of employees covered by the Collective Agreement

Number of employees



Employee share

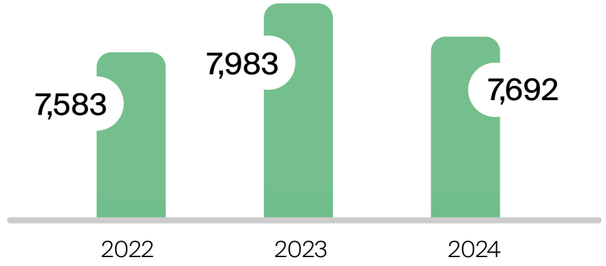




Staff characteristics

GRI 2-7, 2-8, 405-1

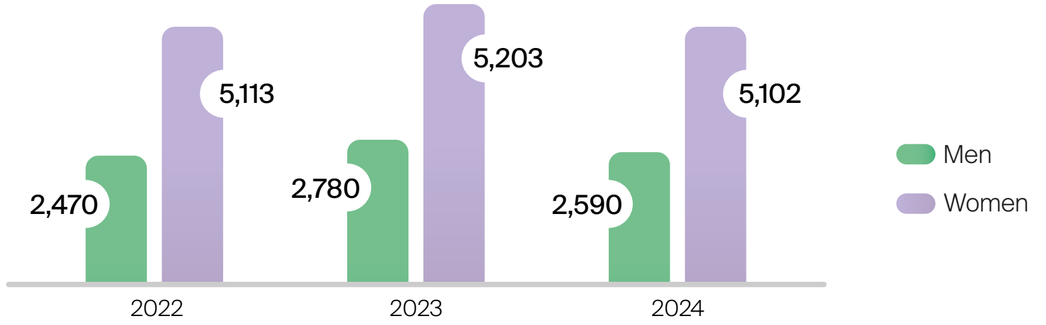
Number of employees[16]



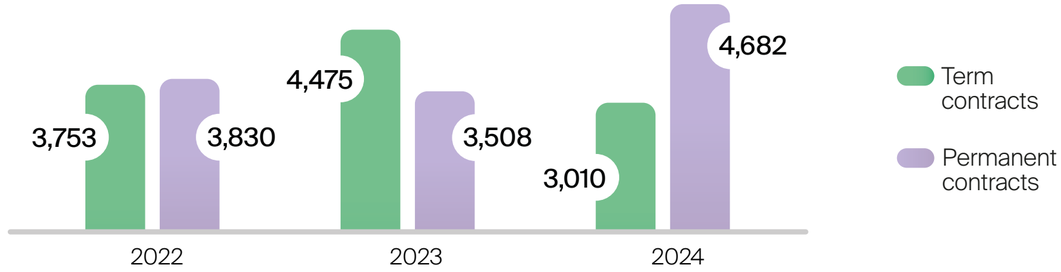
[16] The list of employees in the Bank at the end of the reporting period. The Bank does not employ temporary, seasonal, or other non-standard employees in its permanent staff.



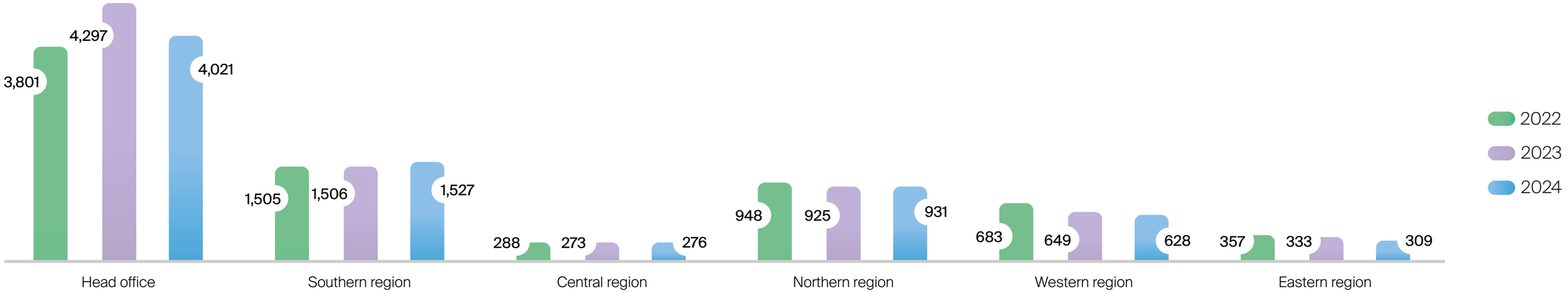
Number of employees by gender



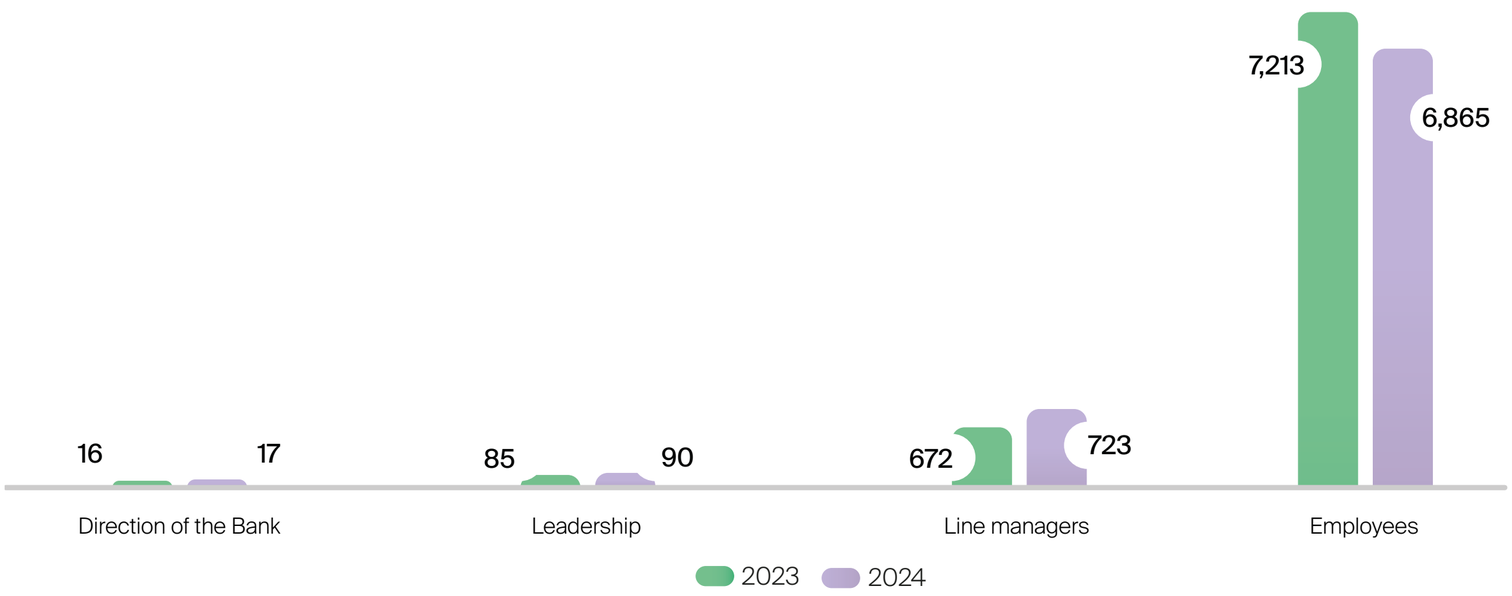
Number of employees by contract terms



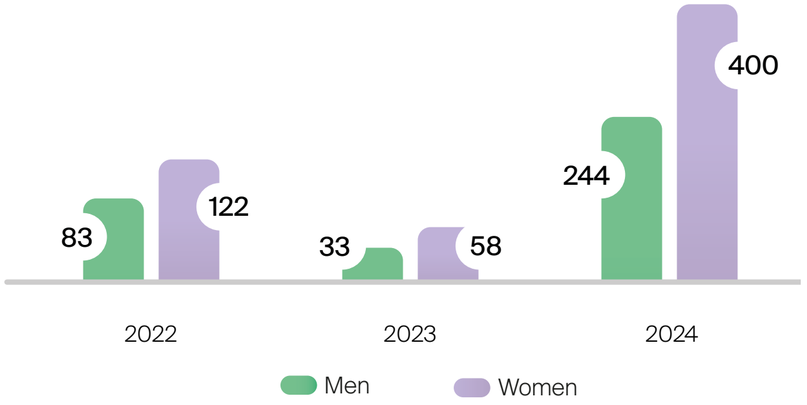
Distribution of employees by region, people



Diversity of management personnel and employees, persons[17]



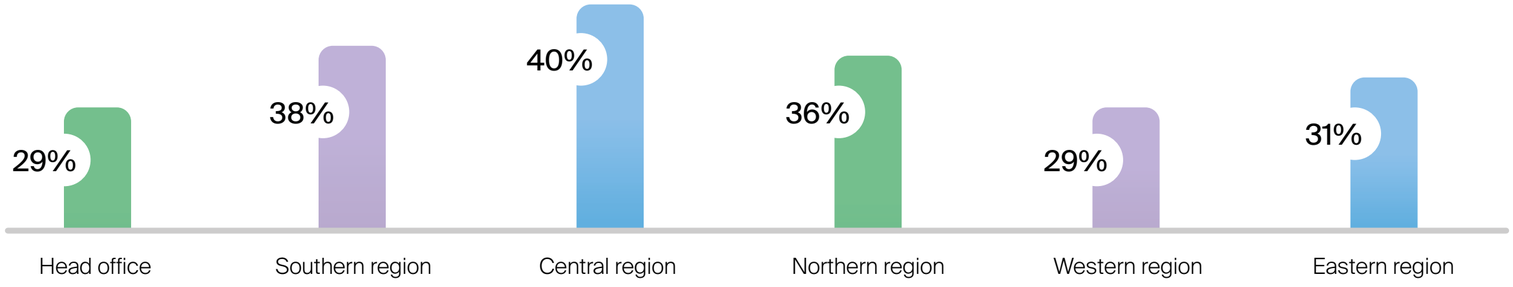
Number of employees who are not on the staff and whose work is controlled by the Bank in 2023 by gender[18]



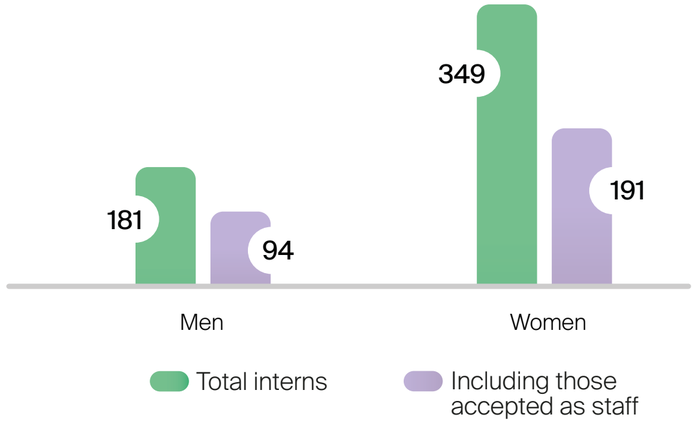
The Bank cooperates with individuals to perform specific tasks by concluding civil law contracts, which allows it to involve performers outside the framework of its internal work schedule.

In order to increase work efficiency and build a personnel reserve, the Bank has started the practice of attracting interns before applying for specialist positions in a number of departments. In 2024, 644 people were recruited, of which 530 were interns. At the end of the year, 54% of the interns were accepted into the Bank's staff.

Turnover by regions



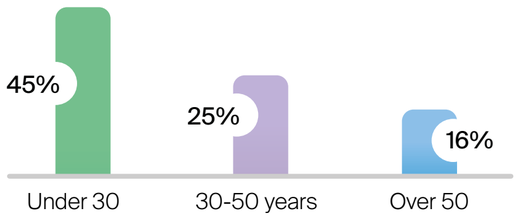
Number of interns in the Bank in 2024 by gender



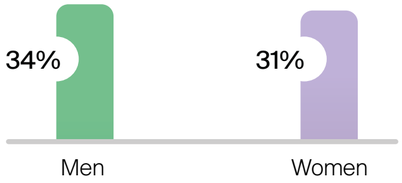
In 2024, the staff turnover rate decreased to 32%, compared with 41% in 2023. A number of measures aimed at staff retention, including the Bank's transition to grades, contributed to reducing staff turnover. The staff turnover rate for the reporting period by age group, gender and region is set out below. For more information about staff turnover, see Databook 2024.

[17] The Bank consistently supports the principles of gender equality and strives to ensure that the annual proportion of women in corporate governance and top management is at least 25%
[18] With independent directors

Turnover by age groups



The structure of turnover by gender



Summary information on current and new employees, staff turnover in the Group of Companies is presented in table

Staff	Unit of measurement	Group	JSC Bank CenterCredit	BCC Invest JSC	BCC Project LLP	BCC Leasing LLP	Sinoasia B&R Insurance JSC	BCC-HUB LLP*	KSZh BCC Life JSC*
List number of staff	persons	8,650	7,692	134	16	51	72	654	31
Staff structure by gender									
Men	persons	3,216	2,590	64	11	22	29	487	13
Women	persons	5,434	5,102	70	5	29	43	167	18
Staff turnover									
Overall staff turnover	%	30	32	34	25	27	34	-	-
Voluntary staff turnover	%	30	32	34	25	27	34	-	-
By gender:									
Men	%	27	34	11	27	31	32	-	-
Women	%	31	31	44	20	24	36	-	-
By age:									
under 30	%	30	45	38	-	29	40	-	-
30-50 years	%	35	25	29	36	54	31	-	-
over 50	%	15	16	17	-	-	42	-	-
Staff structure by employment contract									
Indefinite contract persons	persons	5,359	4,682	35	10	51	22	528	30
Fixed-term contract persons	persons	3,290	3,010	99	6		48	126	1
Broken down by working hours:									
Full-time employment contract persons	persons	8,624	7,692	130	16	51	60	649	26
Part-time employment contract persons	persons	23	0	4	0	0	10	5	4
Total number of hired employees by gender, age, and region									
Total number of hired employees persons	persons	3,562	2,689	55	1	38	32	717	30
By gender:									
Men	persons	1,655	1,082	22	1	15	12	511	12
Women	persons	1,886	1,607	33	0	23	20	185	18
By age:									
under 30	persons	2,097	1,645	24	0	27	16	380	5
30-50	persons	1,385	1,010	25	0	11	12	309	18
over 50	persons	59	34	6	1	0	4	7	7

*The organisation was established in 2024

Incentive system, recruitment and training of personnel

GRI 3-3, 401-1, 404-1, 404-2, 404-3, 405-2

Bank CenterCredit is aware of the need to attract and retain highly qualified personnel in a highly competitive environment. Annual surveys allow the bank to deeply understand the needs of its employees, giving everyone the opportunity to openly share opinions and suggestions aimed at improving their work efficiency.

Based on the feedback received, the Bank adjusts its plans and implements improvements aimed at creating a favourable working environment and strengthening its reputation as one of the leaders in the financial sector in terms of working conditions. Special attention is paid to the training and professional growth of employees, which is seen as an investment in their development and contributes to achieving high performance.

In addition, the Bank pays attention to additional incentives for employees, developing not only professional but also universal skills (soft skills). In this area, individual assessment programs are being developed and unique opportunities are provided for the development of the most successful employees, which stimulates their desire for new professional heights.

Employee training

GRI 404-1

In the reporting year, the Bank decided to separately disclose information about the conducted employee training in three categories: distance learning, external training and internal offline training. This approach makes it possible to visually reflect the diversity and completeness of the educational process provided by the Bank to its employees.

Distance learning is organised through mini-courses, each of which takes about 8 minutes on average, which allows employees to quickly and conveniently master the material without interrupting their main activities; the courses are divided into mandatory, i.e. covering key topics necessary for the performance of official duties, and optional, i.e. aimed at expanding professional knowledge and developing additional competencies. The average distance learning workload is 2 hours per employee.

In 2024, the Bank revised its approach to calculating this indicator in terms of distance learning. In the previous reporting period, the calculation was based on the actual duration of the training, recorded by an internal system that tracks the total time from the beginning to the end of the course by an employee. However, during the analysis, it was revealed that this approach results in a significant overestimation of the results, since the system does not take into account the actual time spent by the employee on training, and allows for long pauses between the beginning and completion of the course. Taking into account the identified limitations, in 2024 the Bank implemented an updated methodology based on the average duration of one mini-course of 8 minutes. The new approach involves calculating by multiplying the total number of completed distance learning courses by all employees by 8 minutes, followed by conversion into man-hours and distribution by number of staff in accordance with GRI 2-7. The use of this methodology makes it possible to more accurately and objectively reflect the real involvement of employees in the learning process, and also ensures comparability and reliability of data in the framework of sustainable development reporting.

The Web Tutor platform is used for internal online learning. The Bank's mandatory distance learning courses include:

- On guard of financial order
- About internal control and compliance risk management in the Bank
- Occupational health and safety in the office
- Fundamentals of information security
- Code of Corporate Ethics
- Social engineering
- Operating risks
- Transactions with persons connected with the Bank by special relations
- Reputational risks
- Business continuity management
- Sustainable Development (ESG)

Bank CenterCredit case

Access to training for each employee

To support employees in professional development and mastering new skills, the HR Management Center, together with the Lerna platform, has prepared a special offer: 400,000 bonus points for training are provided to each employee. This measure opens access to more than a thousand online courses and new short formats: Skillbox mini-courses lasting up to two hours without homework. According to the results of the program for 2024, employees completed more than 500 courses.

Examples of useful courses that can be studied on the platform:

- Excel from scratch to PRO. Calculations and formulas. Smart tables.
- Slide deck master. Infographics.
- Burnout: how to cope with fatigue and regain interest in work and life

The number of employee training hours.

	2023 (restated[19])	2024
Total hours of training	**13,925**	**15,256**
Men	4,941	5,585
Women	8,984	9,671
Leadership	1,925	1,973
Professional employees	12,000	13,283

Basic training programs

GRI 404-2

Bank CenterCredit case

Financial Literacy School

An important mission in 2024 was to develop financial literacy among employees, which is why bcc academy, together with BCC Invest, launched a Financial Literacy School. As part of the program, experts share practical tips and strategies that will help students improve their financial well-being. On 4 October, a Demo Day was organised, where key aspects of personal finance and investment management were discussed. The event brought together more than 200 employees online and offline.

Sessions were also held in 2024

- Introduction to financial literacy
- Basic banking products
- Budget management

More than 800 employees attended the online lectures. All information about the training programs is stored on the BCC Academy portal, giving employees the opportunity to study the materials at their convenience. In 2025, a series of useful webinars on financial literacy is actively continuing.

bcc academy

Development of the distance learning system in 2024:

- 15 new courses and 88 tests have been created.
- About 1,500 employees of the subsidiaries were connected to the distance learning system.
- 7,996 employees were trained on the platform.
- A total of 200 unique courses were studied.

During 2024, BCC Academy gave gifts to employees who scored the maximum number of points for completing all required courses. Starting from 2025, employees receive Centrica for timely completion of the mandatory course. Centrica is the BCC corporate currency for all bank employees. Centrica can be earned not only for completed courses and tests, but also for other activities.

[19] The number of hours of training and, accordingly, the average training load per employee for 2023 has been recalculated taking into account changes in methodology in 2024

BCC Leadership School

In 2024, 187 employees of the Bank completed the BCC Leadership School. The program included pre-training diagnostics, intensive courses on management skills and subsequent testing. The aim of the school was to develop managerial competencies and improve the efficiency of employees. At the end of the program, most of the participants confirmed their high results and began to actively apply their knowledge in practice.

BCC Testers School

The BCC Testers School was held from November 2024 to February 2025. 43 specialists involved under civil contracts took part in it. After four months of intensive training, 15 people successfully passed the exam and completed the program, while nine of them received official job offers at Bank CenterCredit.

Project Management School

In 2024, two streams of the Project Management School were successfully completed, bringing together participants from novice managers to key members of project teams. The program is designed for 6 weeks of intensive training (6 hours per week). In the reporting year, 17 participants mastered the full cycle of project management: from initiation and planning to presentation at NPS, team formation, risk matrix construction and project portfolio management. At the end of the school, the participants demonstrated a high level of acquired knowledge, showing an average score of 4.8 out of 5 possible for applying the acquired skills in real practice (with a target value of 4 points). The school not only provided practical tools, but also created a community of like-minded people who are ready to implement projects with a high degree of maturity and sustainability.



External employee training

In 2024, various formats of educational events were implemented as part of external training, including individual and group programs, trainings, seminars, as well as specialised courses aimed at developing professional and managerial competencies. At the end of the year, 1,436 employees were trained. The total cost of external training amounted to KZT 312 million, with a significant increase in costs compared to previous periods due to pre-purchased educational services for 2025, including, in particular, the methodology for assessing managerial potential. In addition, 600 specialised books were purchased for the Electronic Library to expand the possibilities of self-study and enhance the professional competencies of employees.

For more information about employee training, see Annex F.

Attracting new hires

GRI 401-1

JSC Bank CenterCredit implements a targeted policy for the selection and training of qualified personnel, ensuring the effective contribution of employees to the implementation of the bank's strategic objectives and operational plans. The Bank strives to form a team of highly qualified specialists with the required knowledge and competencies to implement the Company's mission and values. Our approach is based on the principle of generational continuity, encouraging professional growth and development of our own employees. The personnel reserve system serves as the basis for an effective career and the flexibility of personnel movements within the bank, allowing it to identify talents and maintain employee motivation at a high level.

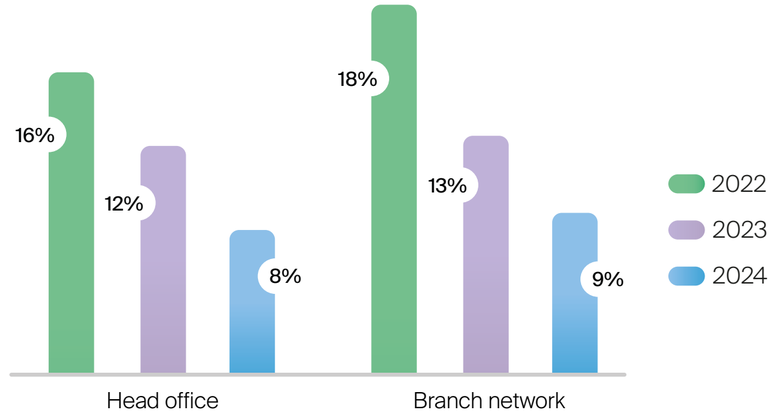
Adaptation programs for new employees are a key element of preserving human resources and improving the business atmosphere in the team. They are aimed at immersing newcomers in the Bank's work environment, understanding its values and corporate culture. Such a system reduces recruitment costs, reduces the risk of employees leaving in the first months of work, and increases the attractiveness of the Bank as an employer.

The most important component of adaptation is getting to know the management, the teams of colleagues and the key objectives of the Bank's activities. During the first months of work, a new employee receives the necessary knowledge and skills, gets comfortable in the work environment and integrates into the organisational structure. The results of the probation period serve as the basis for assessing the employee's readiness for further cooperation with the Bank.

In 2024, the Bank successfully implemented the Workplace organisation project. Its main goal was to automatically provide a new employee with a workplace, appliances, furniture and basic access before 11:00 on the first working day, which reduced time costs and created comfortable conditions for a quick start of new employees.

As a rezult of the effective implementation of the adaptation program in 2024, it was possible to achieve a significant reduction in staff turnover during the probation period. The rate of resignations decreased to 8% in the head office and to 9% in branches, whereas previously these figures were 12% and 13%, respectively.

Staff turnover during the probation period at the Head Office and branches



Recruitment of young talents and cooperation with universities

Participation of Bank CenterCredit in career events in 2024

During 2024, Bank CenterCredit actively participated in a number of career events, pursuing a number of important strategic goals:

- **Talent search:** the main goal was to identify talented and promising candidates, especially university graduates, in order to replenish the staff with highly qualified specialists.
- **Strengthening the employer's brand:** it is important to present the Bank as an attractive workplace, demonstrate the benefits of corporate culture and working conditions, and inform future employees about career opportunities.
- **Communication with target audiences:** direct contact with potential employees allowed to assess the expectations and preferences of the audience, as well as build trusting relations with future colleagues.
- **Expanding the network of contacts:** even if candidates are not suitable at the moment, the database of contacts may be useful in the future to fill vacancies.
- **Competition study:** an opportunity to observe the working methods of competitors, compare their proposed employment conditions and approaches to attracting employees.



In 2024, the Bank's employees visited leading universities in Almaty, such as the Kazakh-British Technical University, the International University of Information Technology and other educational institutions. During the visits, presentations, meetings with graduates and undergraduates were held, as well as internship and employment opportunities at the Bank were discussed.

This resulted in an increase in the influx of talented young people, many of whom later became full-fledged members of the Bank's team. More than half of the interns accepted showed high qualifications and a desire to develop professionally, which led to their successful enrolment in the staff. Such interaction with universities allowed to replenish the Bank with new specialists with fresh ideas and a high degree of motivation, contributing to the development of the organisation in the future.

Incentive system

GRI 404-3, 405-2

JSC Bank CenterCredit pays considerable attention to the development of corporate culture and employee motivation. In 2024, the Bank conducted an analysis of salaries, examining their impact on staff retention and productivity. Optimisation of the reward system has become a priority for further development.

The Bank's remuneration system includes both tangible and intangible incentives. The material component includes salaries, incentive payments and bonuses, while the non-material component includes medical insurance, training, as well as letters of thanks and certificates. Remuneration and motivation are regulated by the legislation of the Republic of Kazakhstan and the Bank's internal policies, ensuring fairness and transparency in matters of remuneration and career development.

Compliance with the code of conduct is a requirement for all employees and is considered an integral part of the corporate culture. If there is a disciplinary penalty, the bonus is paid in accordance with the Regulations on Disciplinary Liability of Employees of JSC Bank CenterCredit.

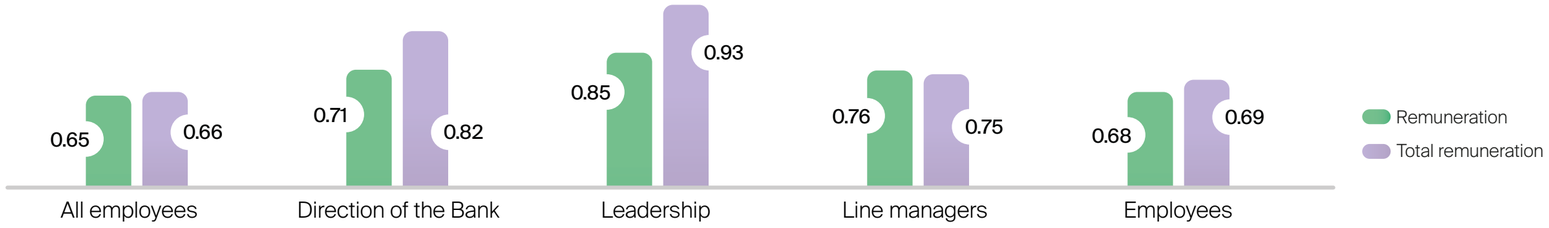
To maintain high motivation, the Bank provides employees with access to information about the bonus system through an internal digital platform where they can explore additional earnings opportunities. The KPIs set correspond to the goals of each department, and their successful implementation is rewarded with bonuses, stimulating the achievement of better results.

The Bank considers gender pay equality as an important element of social justice and economic progress. Every year, steps are taken to optimise the ratio of base salaries and bonuses among employees of different genders, aiming to eliminate the gender pay gap and ensure equal remuneration for equal work. The analysis of the ratio of base salaries and remuneration of women and men for 2024 is shown in the figure below. Additional data on the ratio of base salaries and remuneration by employee category and by head office and branches for 2022-2024 can be found in Databook 2024.

The Bank uses a multidimensional employee performance assessment that takes into account financial and business performance, project success, performance ratio and quality indicators. This approach allows to objectively take into account the contribution of each employee and fairly distribute bonus payments. In 2024, the Bank continuously used four bonus and evaluation programs:

- **Point motivation (Standards/Unified System of Indicators):** The front office has a bonus system based on quantitative indicators and a single metric scale. It takes into account key strategic goals for department managers and replaces existing product incentives.
- **SLA:** The program provides rewards for achieving the goals set by the back office units under the service level agreements (SLAs).
- **Project bonuses:** Bonuses are awarded depending on the success of non-standard projects or project tasks aimed at transforming business processes, introducing innovative products, improving processes and technologies, which contributes to the fulfilment of the strategic objectives of the organisation.
- **Goal map:** The award is paid based on an assessment of the achievement of goals set for a certain period (from three months to one year). These goals are determined by the immediate supervisor and agreed upon with the employee.

The ratio of the base salary and total remuneration of women to men by employee category for 2024



The Bank provides its employees with opportunities for career growth and professional development. In 2024, an assessment of the productivity of all employees was carried out without exceptions.

Percentage of employees who passed the performance assessment

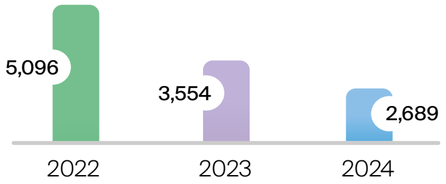
Categories	2024
By gender	
Women	100%
Men	100%
By employee category	
Direction of the Bank	100%
Leadership	100%
Line managers	100%
Employees	100%

The Bank actively applies People Analytics (PA) in the motivation and human resource management system. Using PA allows to monitor the performance of key performance indicators by employees, evaluate the effectiveness of educational programs, identify key employees, and regularly evaluate staff. These data serve as the basis for determining the directions of professional development, the implementation of retraining programs and the formation of individual development plans.

Recruitment results

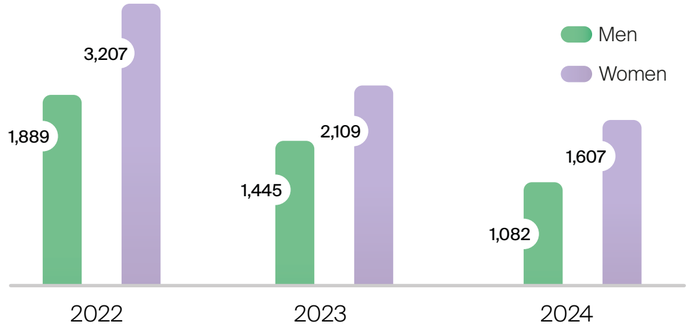
GRI 401-1

Total number of hired employees

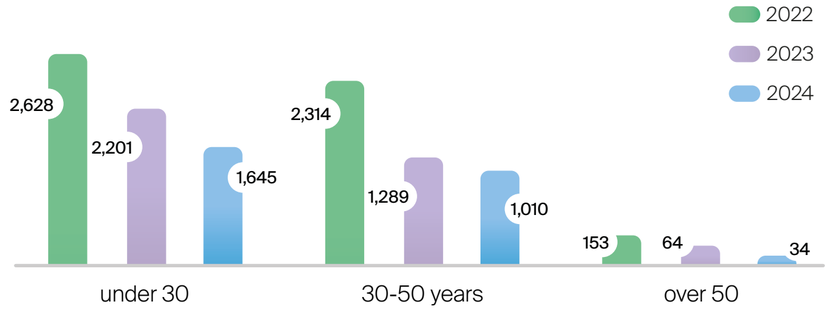


Total number of hired employees by gender and age

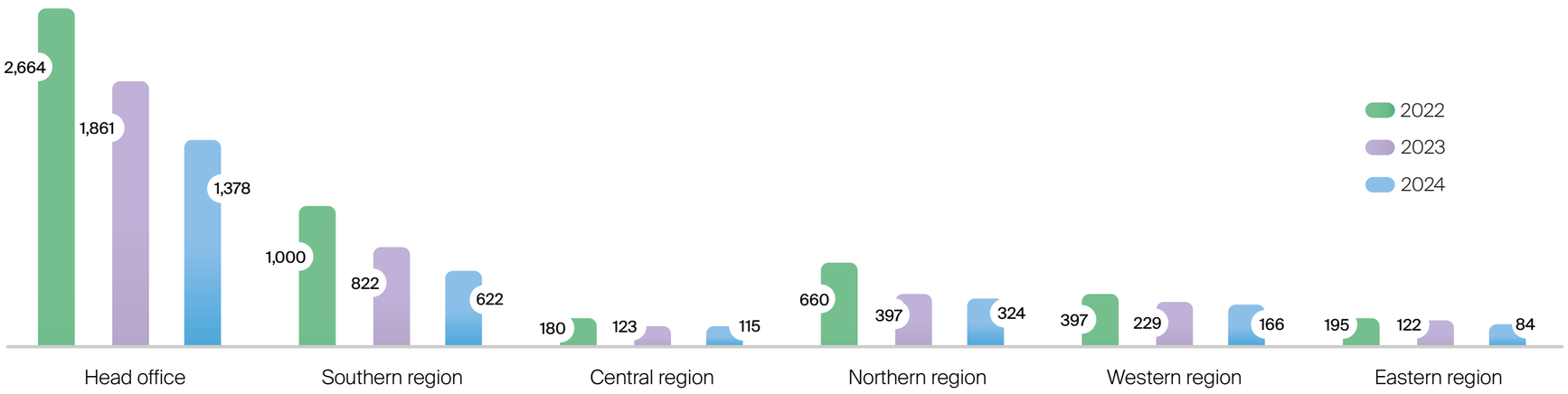
Gender structure



Age structure



Number of hired employees by regions



Bank CenterCredit case

The Key Employees Program

The Bank is implementing a talent reserve program aimed at identifying and encouraging the best employees. Every year, the management selects distinguished employees whose achievements have a positive impact on the Bank's results. Winners receive additional benefits and opportunities for development.

In 2024, 360 employees from different departments were awarded the honorary title, and the Bank's expenses for the program amounted to more than 200 million tenge. Although turnover among key employees has increased from 6.7%[20] to 7.3%, the program remains an effective tool for staff motivation and retention.

Using People Analytics in recruitment

The Bank is actively implementing an integrated approach to personnel management, which makes it possible to accurately assess business needs for specialists and form an effective talent pool. The basis of this approach is the 9 Box methodology, which combines two key parameters: current performance and potential employee abilities. With the help of this methodology, it is possible to systematically identify highly potential specialists with the necessary competencies for further growth within the bank. Regular monitoring of the performance of each employee, together with the use of HR analytics (for example, through data visualisation on dashboards), ensures accurate identification of weaknesses and risks associated with insufficient staffing or increased staff turnover.

In addition, People Analytics improves the efficiency of recruitment and hiring: it improves the candidate search process using the SLA indicator, analyses various recruiting channels, such as HeadHunter (hh.kz), LinkedIn and recommendations, reduces turnover among newly hired employees by accurately selecting candidates.

[20] In 2024, changes were made to the methodology for calculating turnover due to the fact that key employees are selected in the middle of the year. Therefore, the turnover data was recalculated and amounted to 6.7% for 2023.

Social support

GRI 3-3, 201-3, 401-2, 401-3, 403-3, 403-6, 405-1, 406-1

JSC Bank CenterCredit focuses on the social security of its employees, developing and implementing appropriate programs, as well as conducting their constant monitoring. These initiatives are aimed at maintaining staff health, increasing loyalty, and stimulating high-quality and productive work.

Currently, the Bank has the following types of social packages:

1. A basic compensation package provided to all employees, the content of which depends on the level of the position (includes voluntary health insurance programs, compensation for transportation costs, provision of parking spaces, reimbursement of rental costs).
2. The basic motivation package offered to all employees includes flexible working hours, the possibility of remote format, training and development at the expense of the Bank, participation in corporate events, as well as receiving discounts from partners.
3. Extended packages within the framework of the Key Employees project, designed for particularly valuable employees.

During the reporting period, the Bank had no obligations related to pension plans beyond those stipulated by the legislation of the Republic of Kazakhstan, special pension funds or programs.

In 2024, work was carried out on the development of an internal regulatory document regulating the rules of labour regulations. The draft document provides for flexible employment formats, including the possibility of remote, combined work, as well as part-time work. After making the necessary improvements, it is planned to approve this document in 2025.

Development of HR communications

Happy Job

In 2024, the second Happy Job employee satisfaction survey was launched. This is an anonymous employee satisfaction and engagement survey that helps to understand employee attitudes, identify strengths, and areas for improvement. It is worth noting that compared to last year, the percentage of survey completion increased from 57% to 71%. This is a high result, which helps to better understand the general mood of the employees, preserve and strengthen the Bank's strengths, as well as identify areas that require attention and improvement. According to the survey, the Bank has good dynamics in key indicators compared to 2023. The engagement index reflects employee motivation and the productivity of the work environment in a division or company. It increased from 88% to 91% over the period with a target level of at least 80%. The loyalty index increased by 2.9 percentage points to 88.7%, it reflects the employee's energy, willingness to change, and desire to stay in the company. The Happy Index shows percentage of employees who are both loyal and working in a productive environment, their share has increased from 81.9% to 85.5% (the target level is 80%). Satisfaction is the state in which employees are satisfied with their work, working conditions and the working atmosphere in the company according to five metrics, the indicator also increased from 79.8% in 2023 to 85.7% in 2024, with a target value of 80%.

The Employee Net Promoter Score (eNPS) amounted to 59.9% (51.7% in 2023). This means that there are more people in the bank who consider it a good place to work, compared to those who are not ready to recommend the bank as a potential employer, the target value of the index is 60%.

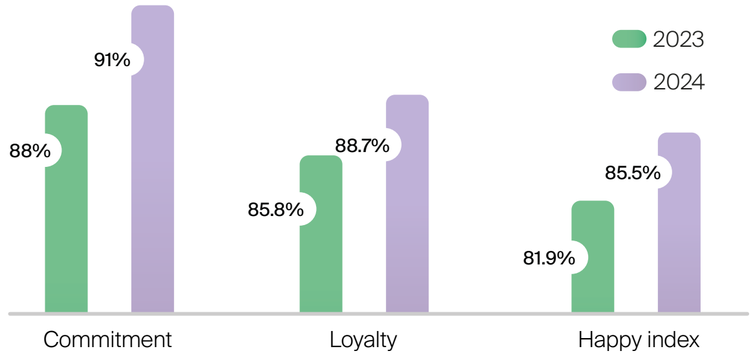
The key metrics to study are:

1. Terms and payment.
2. Career.
3. Balance.

One of the cases of analysing the results of the Happy Job survey is the installation of vending equipment in the Bank's offices, where various drinks are available, which each bcc employee can get for free. Also, according to the results of the Happy Job survey, the Bank received many comments about its desire to participate in a table tennis tournament. In this regard, on 22 June, a tournament was held at the Sharik-Marik table tennis club in Almaty. Both women and men took part in table tennis tournament, and the winners were awarded prizes.

The Happy Service survey to evaluate and develop internal employee interaction when creating the final product/service, etc. based on the results of 2024 was first implemented in early 2025. It provides 360-degree feedback and flexible conversations.

Happy Job Satisfaction Survey Results



Internal communications

In 2024, the Rules on the internal communications system at JSC Bank CenterCredit were agreed upon and implemented. The changes were made to form a unified communications system in the bank. The functionality of news coverage and changes is centralised in the Personnel Management Center, with the exception of business-related communications: products, services, office hours, etc.

The Personnel Management Center is the owner of electronic mailboxes and carries out mass e-mail newsletters from:

- **HR:** a mailbox for informing about news concerning personnel. For example, structural and personnel changes, training information, surveys, KPI goal maps, job digest, employee benefits, etc. The initiator of all these events is the Personnel Management Center.
- **bcc news:** a mailbox for covering all news that is informative and entertaining. For example, changes in strategy, mission, and values, intrabank and corporate events, webinars and lectures (initiated by other divisions other than the Personnel Management Center), and a news digest.
- **bcc info:** a mailbox for informing news that requires special attention from employees. Letters that affect the safety or comfortable working conditions of the bank's employees. For example, lack of water, changes in processes (not related to Personnel Management Center), occupational health and safety, etc.

Developing team spirit

In 2024, 8 corporate events were held for all holidays: 8 March, Nauryz, Defender of the Homeland Day, a holiday for children on 1 June, the bank's birthday, public holidays and a New Year's Eve event at the bank's offices. In honour of the Bank's birthday, all seven thousand employees were presented with gifts with bcc symbols.

The Bank annually hosts football and volleyball tournaments involving all branches and the head office. The qualifying games are held in 3 stages: the Head Office, the southern regions (playing in Almaty), and the northern regions (playing in Astana).

In 2024, internal corporate tournaments were attended by:

- 750 employees in the soccer tournament.
- 185 employees participated in the women's volleyball tournament.
- 120 employees in an online chess tournament.
- 90 employees in the Counter-Strike tournament.
- 84 employees participated in the fan competition.
- 32 employees in the lawn tennis tournament.

The tournaments are annually timed to coincide with the bank's birthday. In addition, cash prizes were provided for the winners and prize-winners, as well as payment for participation in external tournaments, which gave employees the opportunity to represent the company at larger-scale competitions and improve their professional level. In preparation for the tournaments, football and volleyball fields were rented at the bank's branches and head office. Employees can train once a week.

Every year, in preparation for marathons and half-marathons, the Bank supports all participants not only by providing branded products, but also by organising training sessions at the running school. BCC also pays for participation in the marathon and half marathon of a more trained relay marathon team from the bank. In 2024, at the Almaty Marathon 2024, the bcc run team took 14th place among 90 teams in the relay marathon category and 3rd place among the STB. In total, 108 employees of the Bank took part in the marathon, covering 10, 21 and 42 km. In addition, the bcc run team participated in the Summer Relay 2024 race.

Key results:

1. 1st place in the Annual Kraft Spedition CUP tournament organised by the Federation International FootGolf.
2. Participation in the KMPG football tournament, where entry fees were used to purchase sports equipment for the Kazakhstan national goalball team.
3. Victory in the KASE Cup 2024 football tournament.



Social investments of the Bank for major events, million tenge

Items of expenditure	2023	2024
General banking events	171	226
Sports events	20	42
Total expenses for major events	**191**	267[21]

[21] Subject to rounding

Financial assistance

GRI 201-3, 401-2, 403-6

JSC Bank CenterCredit provides financial support to its employees by providing a payment in the amount of one official salary in the following cases:

1. Death of close relatives (parents, children, siblings)
2. Death of a spouse
3. Birth of a child
4. Adoption of a child
5. Anniversaries (50, 60 years)
6. Getting married

In case of an occupational injury, an employee has the right to compensation in accordance with the legislation of the Republic of Kazakhstan. This is an important measure of social protection and guarantees the observance of the rights and interests of employees in labour relations. The Bank also takes care of the health of its employees by annually concluding an insurance contract in case of illness. Medical insurance is provided to employees who have worked at the Bank for more than six months and covers the cost of medical services under insurance programs. Policy management is possible through the Archimedes Kazakhstan mobile app, which lists available medical facilities, service limits, and other important information. . These benefits are not provided to employees who operate on a part-time basis. In 2024, the cost of the voluntary health insurance program amounted to 317.7 million tenge. In addition, the Bank has started cooperation with the Kazakhstan mental health platform Sezim, which provides access to psychological services for employees. The bank compensates for 80% of the cost of consultations, and employees receive a discount and can use the services three times.

Social investments of the Bank

Items of expenditure	2023 (million tenge)	2024 (million tenge)
VHI	230.4	**317.7**
Financial assistance	563	**680.6**
Psychological assistance	4.7	**10.4**
BCC Key People project	99	**206**
Total HR Program expenses	**897**	1,214.5

The Bank provides benefits to all full-time employees regardless of the term of the contract.

In 2024, the Bank paid more than

1 billion tenge

to its employees, most of which went to financial assistance.

Benefits provided to full-time employees in 2024 in million tenge

Types of benefits	Fixed-term and indefinite employment contract
Medical care, VMI	**317.7**
Other financial assistance:	**680.6**
Treatment	71.8
Birth of a child	295.2
Death of a close relative	99.0
Getting married	158.6
Employee anniversaries	50,2
Retirement	5,7
Psychological help	10.4
Total amount	**1,008.6**

Provision of equal opportunities

GRI 405-1 (b), 406-1

The Bank guarantees equal opportunities and an objective assessment of the activities of all employees, regardless of their age, gender or nationality. The observance of the principles of respect for human dignity and non-discrimination is set out in the Human Rights Policy, which the Bank follows in its activities. Employees are protected from harassment and discrimination for filing complaints of any form of violence. Any discrimination based on gender, age, ethnicity, religious beliefs, worldview, health status, sexual orientation, skin colour, marital status, political views, origin, and other personal qualities is unacceptable. In 2024, no facts of discrimination were registered in the Bank.

According to the legislation, working women with children under the age of one and a half years, fathers (adoptive parents), raising children under the age of one and a half years without a mother, are provided with additional breaks for feeding the child (children) at least every three hours of work of the following duration:

1. having one child: each break is not less than thirty minutes
2. having two or more children: each break is at least one hour

At the end of 2024, 33.7% of the Bank's employees were men and 66.3% were women. 47% of line managers were men and 53% were women, which confirms the implementation of the principle of equal career opportunities for both women and men. Detailed information on the gender and age structure of employees is provided in Databook 2024.

Provision of maternity and paternity leave

GRI 401-3

The number of employees who took advantage of parental leave decreased slightly, from 497 in 2023 to 464 in 2024. The majority of those who took advantage of such a vacation were women, who made up 99%, while the proportion of men remained insignificant.

The Bank's social investments.

Indicator	2022	2023	2024
Total number of employees eligible for parental leave	**7,598**	**7,983**	**7,692**
including women	5,120	5,203	5,102
including men	2,478	2,780	2,590
Total number of employees who went on parental leave	**860**	**497**	**464**
including women	859	496	461
including men	1	1	3
Total number of employees who returned to work after the end of parental leave	**375**	**423**	**357**
including women	373	422	356
including men	2	1	1
Total number of employees who returned to work after the end of parental leave and continued to work 12 months after returning to work	**291**	**296**	**232**
including women	289	296	232
including men	2	0	0
Total number of employees whose parental leave ends by the end of the year	**453**	**535**	**593**
including women	448	534	591
including men	5	1	2

The rate of return of women who went on parental leave decreased from 79% in 2022 to 60% in 2023. At that, the return rate for men remained at 100% in 2024.

The retention rate for female employees decreased from 79% to 55%, while for men it remained at 0%.

Occupational health and safety

GRI 3-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-8, 403-9, 404-1

The Bank has a comprehensive occupational health and safety management system, the main purpose of which is to ensure maximum health and safety of employees. The fundamental principle of this policy is to prioritise the life and health of employees over any production and financial interests.

Occupational health and safety management approach

The Bank's Occupational Health and Safety policy, approved by the Management Board, includes the following key areas:

- Compliance with the basic principles and directions of the state policy in the area of occupational health and safety.
- Prevention of accidents and occupational diseases through the implementation of a set of measures aimed at ensuring the safety of all employees of the Bank.
- Strict compliance with the requirements of the legislation and regulations of the Republic of Kazakhstan, occupational health and safety programs, collective agreements on occupational health and safety, state standards of occupational health and safety, as well as internal documents regulating the Bank's activities in this area.
- Identification and analysis of occupational risks in the workplace, followed by the development of effective protection measures.
- Systematic professional development of employees in the area of occupational health and safety.
- Constant dialogue with employees and their representatives on improving working conditions.
- Continuous improvement of the occupational health and safety management system.
- Regular monitoring of compliance with occupational health and safety requirements.

The Bank strictly adheres to a number of regulatory acts of the legislation of the Republic of Kazakhstan in the area of occupational health and safety, including:

- Labour Code of the Republic of Kazakhstan dated 23 November 2015 No. 414-V SAM;
- The Law of the Republic of Kazakhstan dated 11 April 2014 No. 188-V 3PK On Civil Protection;
- The standard regulation on the occupational health and safety management system, approved by the Order of the Minister of Labour and Social Protection of the Population of the Republic of Kazakhstan dated 27 August 2020 No. 340
- Technical Regulations "General requirements for fire safety" approved by the Order of the Minister of Emergency Situations of the Republic of Kazakhstan dated 17 August 2021 No. 405
- Fire safety rules approved by the Order of the Minister of Emergency Situations of the Republic of Kazakhstan dated 21 February 2022 No. 55
- Resolution of the Government of the Republic of Kazakhstan dated 28 December 2023 No. 1182 "On approval of

The Bank adheres to high standards of occupational health and safety protection of employees, following the requirements of the legislation of the Republic of Kazakhstan and international standards (ISO 45001 or OHSAS 18001). The regulations on the occupational health and safety management system include mandatory introductory briefings for all employees on civil defence, fire safety and labour protection.

The main objectives of the system are as follows:

- Implementing an occupational safety policy based on legislation and modern scientific achievements
- Improving the efficiency of occupational safety management in accordance with the Bank's strategy
- Coordinating security actions between departments and implementing best practices to create a comfortable working environment
- Developing incentive systems to improve working conditions and reduce production risks
- Cooperating with government agencies to improve working conditions and safety
- Training and professional development of personnel in the area of work safety

Measures taken by the Bank:

- Monitoring the condition of workplaces and compliance with labour protection standards.
- Ensuring the security of all the Bank's facilities in accordance with the rules and standards.
- Improving working conditions through the introduction of safe technologies and equipment, as well as optimising organisational processes.

These measures create a safe and healthy working environment, demonstrating the Bank's commitment to occupational health and safety as an integral part of corporate policy and sustainable development.

The responsibility for the functioning of the occupational health and safety management system lies with specialists in fire safety and occupational safety, who regularly undergo training and certification. The Bank has developed instructions for emergency situations such as earthquakes, fires and flooding, as well as rules for the operation of machinery and equipment. These measures ensure the safety and preparedness of employees for emergency situations.

The occupational health and safety management system applies to all full-time employees, with the exception of administrative and economic personnel serviced through contractors. The relevant contractor is responsible for compliance with occupational safety standards in relation to such personnel.

Training activities in the area of occupational health and safety

GRI 403-5, 404-1

The Bank implements a continuous training policy in the area of occupational health and safety, aimed at creating a safe and healthy working environment, minimising risks and preventing occupational diseases and injuries.

The Bank's officials participate in specialised external educational programs dedicated to fire and technical safety, as well as general occupational safety issues. Upon completion of the courses, employees receive official certificates confirming their professionalism. Certified employees conduct internal trainings for colleagues, spreading useful knowledge and practices.

The new staff is undergoing basic training, consisting of modules on civil protection, fire safety and occupational safety. Certified professionals become mentors who train colleagues in their department. Additional training is provided for employees whose work involves increased professional risks, including security services, business personnel, IT specialists and other categories.

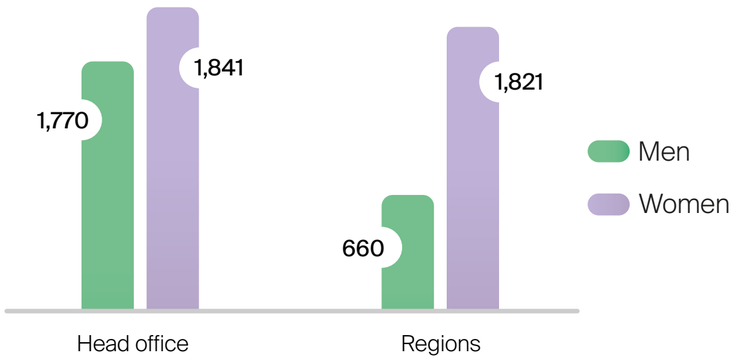
The Bank has established a requirement to conduct mandatory briefings for 100% of its employees, confirming the importance of these events. Knowledge on occupational safety and fire safety is checked twice a year through testing. The training programs implemented

Training	Frequency
Introductory briefing in civil protection, safety and labour protection	When applying for a job
Initial on-the-job training	On the first working day
Additional on-the-job training	Every six months
Targeted briefing	For a certain type of work
Extraordinary briefing	When an emergency occurs

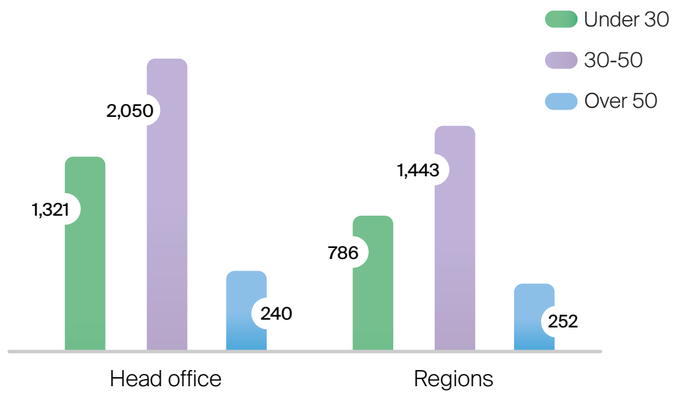
Employees also receive external training Responsible persons are trained in specialised centers for occupational safety and fire-technical minimum programs, and members of civil protection units are trained in the Ministry of Emergency Situations of Almaty.

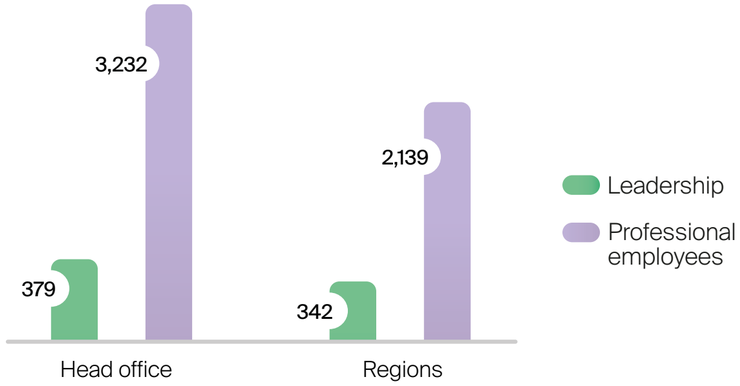
Total number of employees who have completed a course in safety and labour protection[22]

Gender structure

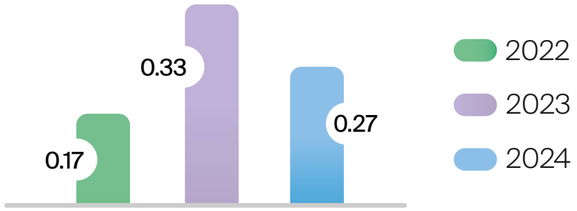


Age structure





Average annual hours of training per employee (in occupational health and safety)





[22] Indicators for 2024 for the distance learning course "Occupational health and safety in the office".

Risk identification process and emergency preparedness

GRI 403-2, 403-4, 403-8, 403-9

The health of employees and occupational safety are ensured in the Bank on a preventive basis in order to minimise occupational risks even before they appear. Measures include the identification of potential hazards, the development and implementation of preventive measures, safety training for personnel, and the application of risk mitigation measures. Moving from employee control to a systematic approach based on constant interaction between managers and employees, the Bank focuses on identifying risks and creating comprehensive measures to prevent them.

Given the nature of the Bank's activities, the risk of injury and occupational diseases is minimal. In 2024, the Bank recorded 0 fatal accidents, 1 case of moderate severity and 10 cases of minor injuries to employees. The most common causes were traffic accidents, equipment problems, and unforeseen circumstances. All the victims were provided with medical assistance, training and awareness-raising activities to prevent similar incidents in the future. Financial assistance was provided in some cases. The Bank uses an electronic report card, which automatically records data on sick leave, vacations, business trips, overtime and weekend work, as well as absenteeism based on official documents. This allows to accurately calculate the man-hours worked and analyse the reasons for absences. The Bank uses the LTIFR[23] indicator as the main criterion for evaluating the effectiveness of the occupational safety system. In 2024, the LTIFR was 0.72.

Annual inspections of workplaces and premises are carried out to ensure occupational health and safety. Violations are recorded in the regulations with an indication of the time frame for correction, which are immediately eliminated by the responsible departments. Inspections are aimed at detecting violations of fire safety regulations and other aspects of occupational safety. They are conducted systematically and cover all company premises, including offices, archives, service areas and other facilities. The problems found during the inspections are fixed, after which a re-inspection is carried out to confirm the corrections. Additional transmitters have been installed, briefings have been conducted, and training sessions have been organised to improve earthquake evacuation procedures. Regular seismic exercises include the participation of the Fire Technical Committee.

Every employee has the right and duty to intervene in dangerous situations or violations of the Security Policy. Risk reports are received through personal appeals or e-mail, and all information is carefully checked. The Bank actively supports the initiative of employees to identify risks and responds to complaints and emergencies through unscheduled risk identification processes. The results of these activities are taken into account in the occupational health and safety management system and serve as the basis for adjustments to workplace safety measures.

Medical care and accident investigations are carried out through special committees, including the Trade Union and the Conciliation Committee. Compensation is provided to affected employees. To prevent incidents, briefings are conducted and equipment such as fire extinguishers is installed. In any case, a thorough investigation is conducted to determine the degree of guilt.

The Bank has an internal hotline (777), i.e. an emergency response team. Calls to this number are automatically redirected to the call center for quick communication with rescue services.

Drivers undergo a daily medical check-up before their shift, and security guards provided by outsourcing companies are required to undergo a medical check-up during employment, including certificates from a psychologist, psychiatrist, and narcologist.

Development Plans

The HR area includes several important initiatives in the Bank's updated development strategy until 2030:

Digitalisation of HR processes	**Developing a corporate culture**	**Adaptation of ESG principles**	**Strengthening HR analytics**	**Improving the effectiveness of learning and development**
the introduction of artificial intelligence and data analytics to improve the effectiveness of personnel management	creation of an environment conducive to employee engagement, strengthening values and team spirit	Integration of sustainable human resources solutions, support for social responsibility and environmental initiatives	Using predictive models to assess staff needs and plan career paths	Modernising training programs with an emphasis on digital skills and innovative approaches

[23] Lost Time Injury Frequency Rate (LTIFR) is the coefficient of injury frequency with temporary disability. The coefficient is calculated using the formula N * 1 000 000 / T (the ratio of the number of victims of accidents with loss of working time [N] to the total number of hours worked by all employees [T], normalised by 1 million man-hours).



centercredit
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Message from the President

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4. Respect for human rights, business ethics and anti-corruption
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Responsibility to society

GRI 2-28, 2-29, 3-3, 201-1, 201-4, 203-1, 203-2, 207-1, 207-2, 207-3, 415-1

Disclosure of information regarding the created and distributed added value of the Bank, million tenge

	2022	2023	2024
Direct economic value created (revenue)	**225,664**	**273,392**	**421,288**
Net interest income after credit loss expense	78,685	209,753	278,583
Net non-interest income	146,979	63,639	142,705
Distributed economic value	**(80,749)**	**(142,876)**	**(226,827)**
Operating expenses, including:	(73,919)	(118,475)	(176,091)
- Remuneration of employees, taking into account social contributions and payroll taxes	(37,948)	(64,957)	(86,660)
- Expenses on taxes other than corporate income tax	(6,415)	(10,801)	(17,829)
Corporate income tax expense	(6,830)	(24,401)	(50,736)
Undistributed economic value	**144,915**	**130,516**	**194,461**

For more information about the Bank's active participation in the socio-economic development of the regions, see Social Investments and Charity section.

Disclosure of information regarding the created and distributed added value of the Group, million tenge

	2023	2024
Direct economic value created (revenue)	**283,348**	**438,030**
Net interest income after credit loss expense	214,476	301,790
Net non-interest income	68,872	136,240
Distributed economic value	**(148,102)**	**(235,611)**
Operating expenses, including:	(123,091)	(183,230)
- Remuneration of employees, taking into account social contributions and payroll taxes	(67,370)	(98,817)
- Expenses on taxes other than corporate income tax	(11,748)	(19,961)
Corporate income tax expense	(25,011)	(52,381)
Undistributed economic value	**135,246**	**202,419**

Approach to interaction with the population in the regions of presence

GRI 2-29

Bank CenterCredit actively implements the principles of corporate social responsibility, playing an important role in creating a prosperous environment in the regions of its presence. It participates in initiatives aimed at improving education, culture and the economic situation, which significantly improves the quality of life of the population. The Bank's contribution is expressed in support of programs that promote regional growth and progress.

A special place in the Bank's policy is to support the educational sector, including the creation of inclusive learning environments and the promotion of creativity among young people. In addition, the Bank is actively involved in the cultural life of the country, providing sponsorship to theaters, museums and holding various cultural events such as festivals, performances and concerts. It also publishes literature and transforms urban spaces. In addition, the Bank invests in environmentally sustainable projects aimed at protecting the environment and reducing its carbon footprint. Such investments contribute to both environmental awareness and economic growth through the development of green technologies.

The Bank also promotes equality and diversity by supporting programs that combat discrimination and ensure equal opportunities for all segments of the population.

Objectives of interaction with the population and public organisations

GRI 2-29

Creation of partnerships:

- establishment and expansion of partnerships in order to increase the effectiveness of the Bank's work in implementing sustainable development concepts and involving the population of the regions where it operates in this process

Getting information from experts, communities and non-governmental organisations:

- sharing information and gaining knowledge on key aspects of sustainable development allows the Bank to make more informed and effective decisions

Raising awareness of the general audience about the Bank's obligations and initiatives:

- actions that purposefully reduce the impact on the environment, respect and protect human rights, and contribute to the support of socially significant and environmental projects This is aimed at making the public aware of the Bank's role and actions towards achieving a cleaner and fairer society.

The Bank's participation in industry and government organisations and initiatives

GRI 2-28, 201-4, 415-1

JSC Bank CenterCredit actively participates in government programs aimed at supporting entrepreneurship and developing the real sector of the economy, being one of the leading lenders in this area. In 2024, the Bank continued to contribute to the country's economic growth by participating in several important initiatives:

1. **Government business support:** Bank CenterCredit participated in major programs aimed at supporting the real sector of the economy, offering its clients affordable credit products and favourable financing conditions.
2. **Development of responsible financing:** The Bank's employees involved in implementing the principles of responsible financing participated in specialised seminars organised jointly with the Agency for Regulation and Development of Financial Markets (ARDFM), the European Bank for Reconstruction and Development (EBRD) and other international organisations. This contributed to staff professional development and the introduction of advanced financial practices.
3. **Development of legislation:** The Bank has been actively involved in the process of creating and improving the regulatory framework affecting the economy and banking sector. This made it possible to create more favourable conditions for investment and doing business.
4. **Strategic cooperation with the state:** By strengthening partnerships with government agencies, the Bank viewed the state as a key client and an important ally in the country's development.

During the reporting period, Bank CenterCredit did not receive government financial assistance. In 2017, the National Bank of Kazakhstan allocated state aid to five banks in the country, including Bank CenterCredit in the amount of 60 billion tenge until 2032. In December 2024, the Bank was able to repay 20 billion tenge.

During the reporting period, the Bank did not make donations for political purposes, including support for political parties, election campaigns or other political initiatives. The Bank also did not carry out lobbying activities, was not a member of trade associations that influence policy or regulation and other types of contributions and groups.

The Bank maintains close partnership with international institutions, which helps to successfully adapt global achievements and standards of sustainable development to the specifics of the Bank's activities, thereby strengthening its role as a socially responsible organisation and an environmentally oriented business.

For many years, the Bank has been a partner of the EBRD in the GEFF (Green Economy Financing Facility) financing programs, as well as the EBRD Women in Business (WiB) Programme.

As part of its support for the green economy in 2024, the bank continued its partnership with the United Nations Development Programme (UNDP) in Kazakhstan to reduce the risks of investing in renewable energy technologies (RES).



As part of joint partnership projects, experts from the European Bank for Reconstruction and Development (EBRD) and the United Nations Development Programme (UNDP) organise specialised educational courses for the bank's employees and clients, provide qualified expert advice and audit the bank's processes in accordance with the best international practices of sustainable development.

In 2023, the Bank joined the UN Global Compact. The initiative is aimed at encouraging the social responsibility of businesses. Support and implementation of 10 fundamental principles in the area of human rights, labour relations, environmental protection and the fight against corruption.

In 2023-2024, the Bank participated in the SDG Ambition Accelerator. The program aims to support participating companies in setting ambitious corporate goals and accelerating the integration of the UN SDGs into business processes and the management system. In 2024, the Bank participated in the Climate Ambition Accelerator. The program aims to equip companies with the knowledge and skills necessary to accelerate progress in setting science-based emission reduction targets in accordance with the 1.5 °C approach.

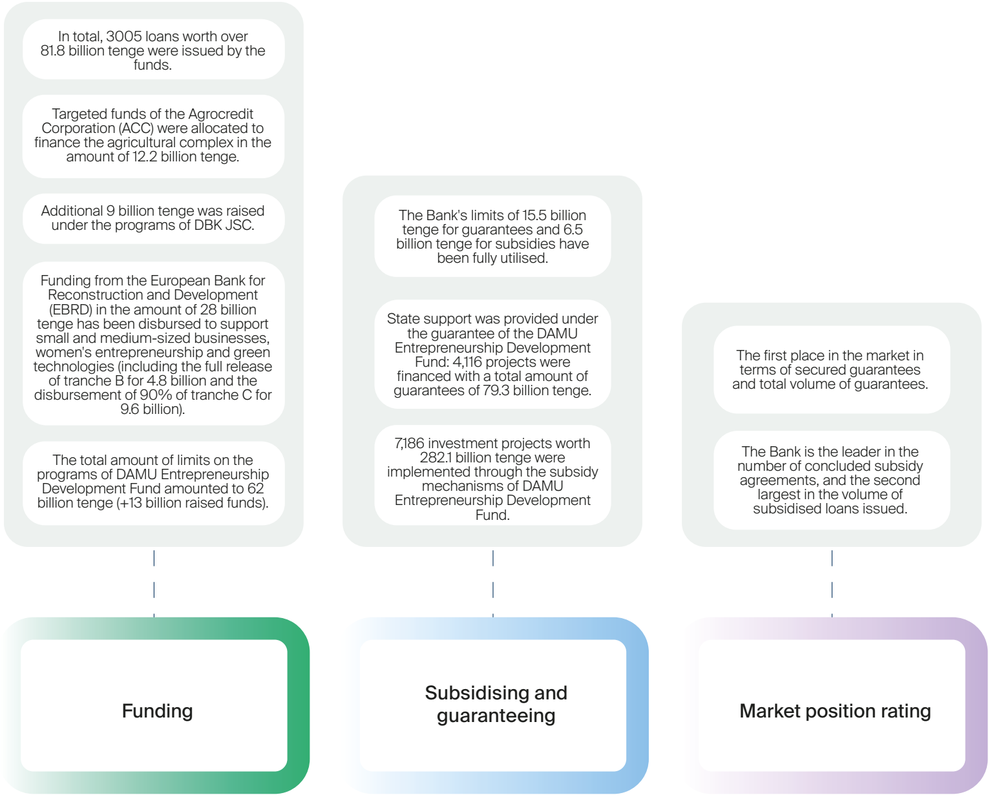
Support for small and medium-sized businesses

GRI 203-2

Support for small and medium-sized businesses is one of the key areas of the Bank's ESG strategy. Small and medium-sized businesses play an important role in the economy of Kazakhstan, providing employment for the population and increasing competition in the markets. The Bank develops special programs and products aimed at supporting and developing small and medium-sized businesses.

For more information about the products and their financial results, see the Annual Report of JSC Bank CenterCredit.

The Bank actively supports entrepreneurs of various business levels, from microenterprises to large companies, by participating in the implementation of state and international financial assistance programs. The Bank's clients have access to effective support tools, including concessional lending, compensation for part of the interest rate, and the provision of bank guarantees in cases of insufficient collateral.



Tax policy and payments

GRI 207-1, 207-2, 207-3

Bank CenterCredit strictly adheres to the principles and standards of tax policy management, ensuring compliance with all regulatory requirements and principles of taxation. The Bank's tax accounting policy, which is accessible to all employees, is the basis for effective tax management. The tax policy of JSC Bank CenterCredit is an important component of financial management and demonstrates commitment to corporate responsibility. The Board of Directors approves the policy after consulting with key management and control units of the Bank, such as the Chief Accountant, Financial Director, Legal Department, compliance control and internal audit services. The tax accounting policy is updated when the Tax Code of the Republic of Kazakhstan, legislation on accounting and financial reporting, international financial reporting standards are changed, as well as when the Bank makes decisions affecting tax accounting.

Bank CenterCredit case

The StartUp Business Program

In October 2023, Bank CenterCredit introduced the StartUp Business program, aimed at supporting start-up entrepreneurs. Newcomers are provided with favourable conditions for

starting and scaling a business, including a fast application approval process, a simplified package of documents and a special approach to assessing the potential of projects. A special feature of the program is the opportunity to take advantage of government subsidies and grants that facilitate the start of business.

Already in the first year of its existence, the program has demonstrated significant success: the customer base has grown tenfold, and the volume of loans issued amounted to 6.2 billion tenge.

Reliable business support without collateral

"Credit limit on account" is a special product of the Bank that allows small and medium-sized businesses to quickly solve the problem of lack of funds to cover short-term expenses. A distinctive feature is the absence of the need for collateral and the high speed of processing applications. The funds raised can be used for any economic needs, including the payment of taxes, salaries, and settlements with suppliers. The volume of the limit is reviewed monthly depending on the financial activity of the company.

This tool solves the key problem of liquidity shortage among Kazakh businesses, allowing them to prevent crisis situations and consistently fulfilll obligations to partners. Compared to the results of 2023, the product portfolio increased 1.5 times, reaching 14.9 billion tenge.

Success stories with us

As part of the program, the Bank tells the stories of entrepreneurs who have successfully implemented their projects with its support. Each such story demonstrates specific ways in which working together with the bank has helped overcome difficulties and achieve meaningful results.

The purpose of publishing such examples is to support aspiring entrepreneurs with useful ideas and practical advice, and to show the available business development opportunities. The dissemination of cases through the media is aimed at attracting public attention to successful projects and strengthening the bank's reputation as a reliable partner for small and medium-sized businesses.

The stories of entrepreneurs are available on the Bank's website, in the bcc journal section.

- The sewing business: from a dream to a goal. The story of Gulmira Aitymbetova, the founder of GUITEX.
- Stylish and profitable: what is a basic wardrobe and how to assemble it?
- The dream accepts no obstacles: the story of Maria Lipinskaya, the founder of the AsiaEliteFoodGroup.
- Art-Depo Studio printing house: combining business and art.

The Bank adheres to a conservative approach, ensuring full compliance with legislation and regulatory requirements. The basis of tax policy consists of the principles of taxation set out in the Tax Code of the Republic of Kazakhstan: commitment, certainty, fairness of taxation, integrity of the taxpayer, the unity of the tax system and the openness of tax legislation.

The Bank's tax policy is focused on maintaining high tax discipline and compliance with all relevant tax laws and regulations, emphasising the Bank's commitment to the principles of responsible business practices and corporate transparency. Data on tax payments are presented in the independent auditor's report, which provides additional transparency and accessibility of information for stakeholders.

Our tax principles:

1. The Bank strives to act responsibly, honestly and fairly in relation to the tax authorities and the tax legislation of the country in which it operates.
2. The Bank does not operate in countries with preferential taxation or jurisdictions with zero income taxes, does not use structures that do not have commercial content, or for tax evasion or avoidance in jurisdictions considered tax havens.
3. The Bank does not and will not promote illegal tax planning schemes, and does not and will not engage in activities that could be interpreted as tax evasion, even if this is consistent with the literal interpretation of the law.
4. The Bank applies market pricing to intra-group transactions using the comparable uncontrolled price method

Tax risk management

GRI 207-2

To reduce tax risks, the Bank has implemented a systematic and comprehensive approach that provides for continuous monitoring, analysis and assessment of areas at the highest tax risk. Control mechanisms are built into the accounting system, and the Bank regularly applies to the tax authorities to clarify difficult situations, which helps to effectively manage risks and minimise their consequences. The Chief Accountant of the Bank manages the process of compliance with the tax accounting policy, while the internal control, compliance and internal audit services assess compliance with the established requirements. Internal and external communication channels through the compliance service are provided for reporting violations or suspicious actions in taxation.

The Bank's strategy involves the integration of taxation into all key areas of the Bank's activities, such as the conclusion of contracts, the development of new products, the approval of tariff policy and other significant processes. These measures are implemented taking into account the recommendations of the Tax Policy Directorate, which confirms the Bank's commitment to act openly and responsibly in tax management.

The Bank's tax strategy and policy have been developed in such a way as to comply with both current legislative requirements and long-term sustainable development goals. Through transparent tax risk management and active cooperation with stakeholders, BCC maintains a high degree of tax discipline. Tax financial statements are published annually in the Bank's annual report and reviewed by an external auditor.

Social investments and charity

GRI 203-1

Participation in social and environmental projects and initiatives

In 2024, Bank CenterCredit supported more than 130 charitable projects focused on education, healthcare, and the environment. These initiatives help to improve people's quality of life and contribute to the preservation of the environment.

Key initiatives:

Direction	Initiatives
Education	• International Organising Committee of the 7th Eurasian Summit of Digital Economy Leaders: Kazakhstan Smart Space 2024 • The opening of the scientific and technological park and the Albina Kotova Hall was opened at Asfendiyarov Kazakh National Medical University • Graduation of wowmama.kz online courses, which enhance parental competencies and builds high-quality relations between adults and children from the Ana Uyi Public Foundation • The Bank supported the municipal state institution "Kostanay special complex "kindergarten-boarding school" for children with special educational needs" No. 2 • The first library with the works of Nobel laureates was opened at Abai KazNPU with the support of Bank CenterCredit • Grants for talented applicants were allocated for the Zhubanov Aktobe Regional University • Support for the public background of the MamaPro Foundation for the Support and Development of Socially Vulnerable Women in Almaty
Sports	• Final of the school basketball league in Almaty 'Give the Ball', where more • than 45 teams in 5 age categories took part • The Bank supported the Samurai Sports Academy, which specialises in training Brazilian jiu-jitsu and grappling skills as part of the support and development of free sports for orphans and children left without parental care • Almaty hosted "Almaty Geek Games Expo", the largest geek festival in Central Asia. Each guest of the festival learned about the advantages of bank cards and the VISA payment system, namely about the products of #juniorbank and #kartakarta from Bank CenterCredit, the general sponsor • The Public Foundation "Irtysh-Pavlodar Football Club" received support from the bank to attract pupils of football schools in Pavlodar region to revive FC and bring them to the Premier League.
Healthcare	• Charity event "100 strollers in Kazakhstan" organised by Dos Ortopedia • The Public Association "Society of Oncologists and Mammologists" has received support for holding a marathon in Astana, dedicated to "Pink October", the month of raising awareness about breast cancer. • Asfendiyarov Kazakh National Medical University received support for the Asfen Forum, aimed at bringing together the academic community, researchers and young scientists in healthcare
Culture and art	• The General Panfilov Foundation in Almaty was supported to purchase display stands at the branch of the State Military Historical Museum of the Armed Forces of the Republic of Kazakhstan in Almaty. • The exhibition "Upcycling for the Future" is presented with the assistance of Air Astana at the Bank's site
Ecology	• Kazakhstan National Federation of UNESCO Clubs has received support for the implementation of "Turaqty Jol", the National Social eco-campaign • The Bank organised an eco-tree planting campaign "Alley of the BCK Collective" in order to preserve and restore forests, develop urban green areas, and develop public interest in preserving, preserving, and enhancing the forest resources of Kazakhstan. • Support for the activities of the Private Foundation "Teplo foundation" in order to ensure the functioning of charity
SME	• With the support of the Bank, a conference for accountants "Accountant's happiness = BALANCE. Life. Career. Me..." was held. • Together with Ernst&Young, Bank CenterCredit held a seminar for large corporate clients aimed at raising awareness of ESG and sustainable development issues • BCC gathered Kazakh entrepreneurs at a business meeting dedicated to the challenges of effective management and marketing in modern conditions • The BUSINESS BOOST event, organised by the Bank CenterCredit, took place in Almaty. The event brought together 80 representatives of leading companies and was aimed at raising financial awareness and stimulating sustainable business development.

Bank CenterCredit case

Support for flood victims

In response to the devastating floods in Western Kazakhstan, Bank CenterCredit provided financial assistance in the amount of 5.5 billion tenge. These funds are intended for the rehabilitation and construction of new housing for the affected families. Financial resources were distributed among various developers for the purchase and construction of housing.

Bakhytbek Bayseitov, Chairman of the Board of Directors of JSC Bank CenterCredit, stressed the importance of joint efforts in overcoming the consequences of natural disasters: "Together we contribute to flood control and only together we can overcome any difficulties. During this difficult time, I want to express my support to all those affected and my confidence that we will cope with any challenges. Let's join our efforts to rebuild and further develop our country."

This case illustrates the Bank's social responsibility and solidarity with the region's population. The financial support provided not only helps to restore lost housing, but also strengthens the bank's credibility as a responsible participant in the economic and social life of the country.

Support for the Karyzsyz kogam initiative

Bank CenterCredit supports the Karyzsyz kogam republican project aimed at improving financial literacy and helping citizens with overdue debts. As part of the initiative, the bank participates in providing legal advice, facilitates debt restructuring, and informs the public through its own channels. Participation in the project reflects the Bank's social responsibility and contributes to the formation of a culture of responsible borrowing in society.

TURAQTY JOL ecological campaign support

In 2024, Bank CenterCredit continued its cooperation with the Kazakhstan National Federation of UNESCO Clubs, becoming the general partner of the fifth National Social ecological campaign TURAQTY JOL. This initiative is aimed at fostering respect for the environment and cultural heritage among young people through educational activities. The campaign included tree planting campaigns, festivals of environmental ideas, nationwide clean-up days, and creative contests dedicated to protecting nature. Special attention was paid to discussing the prospects of introducing ESG principles into the economy and public life.

The campaign reached more than 20,000 people, collecting over 400 applications for contests and planting about 100 seedlings. The participants also collected 4 tons of waste for recycling. This large-scale involvement of young people highlights the importance of environmental education and forms the foundations for sustainable development. The support of the Bank CenterCredit contributes to the formation of a responsible attitude towards natural resources and the strengthening of social responsibility in society.



Wish Tree

This year, the campaign attracted even more participants: festive events were organised for children with disabilities, the elderly and large families.

Special morning assemblies with contests and concerts were held in special institutions, in which Grandfather Frost and the Snow Maiden took part. The children received gifts and a New Year's mood.

Special attention was paid to the older generation: in all regions of the country, the bank's employees visited homes for the elderly. In addition, food baskets were collected and handed over to families with many children.

In 2024, the Bank allocated to support charitable, sponsorship and social activities.

6.6 billion tenge

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Environmental responsibility

GRI 3-3, 302-1, 302-3, 302-4, 303-3, 303-4, 303-5, 304-1, 305-1, 305-2, 305-3, 305-4, 306-2, 306-3, 306-4, SASB FN-CB-410b.4, IFRS S2

This section of the Report is devoted to the management of environmental responsibility issues of JSC Bank CenterCredit. As one of the leading financial institutions in Kazakhstan, the Bank tries to minimise its negative impact by using rational resource consumption approaches, implementing waste management and energy efficiency improvement programs. The Bank implements principles and policies for responsible financing, including the selection of projects that promote environmental sustainability and social responsibility, including the principle of non-financing of certain types of activities. The Bank is also aware of its responsibility in combating climate change and its role in achieving carbon neutrality. Starting in 2023, BCC implements programs to assess, reduce, and manage direct and indirect greenhouse gas emissions, as well as funded emissions, in accordance with the requirements and recommendations of international standards.

In 2024, JSC Bank CenterCredit became the first bank in Central Asia to develop a long-term climate strategy, a strategic document containing goals and a set of measures and initiatives to achieve carbon neutrality by the bank.



The Bank's updated strategy until 2030 outlines the bank's climate priorities, as well as goals for improving energy efficiency, waste management, responsible financing, and environmental and social risk management.

As part of the Strategy's implementation, the Bank continuously monitors environmental impacts, including climate risk analysis, which allows it to respond to and adapt to changes in a timely manner.

Approach to environmental responsibility management

GRI 304-1 IFRS S2

Environmental protection is an essential element of the Bank's social and economic activities. The Bank recognises its environmental responsibility and the importance of contributing to the sustainable development of the regions where it operates, despite the limited direct environmental impact of its operations. Realising the key role of financial institutions in creating a low-carbon economy, JSC Bank CenterCredit is actively implementing programs and initiatives that promote the agenda of business environmental responsibility.

The main directions in environmental care:

- Implementation of the climate strategy
- Implementation of responsible financing principles
- The Green Office project: energy efficiency, waste

In 2024, BCC was the first Kazakh bank to develop and approve a climate strategy. In the context of the global transition to sustainable development and carbon neutrality, the development and implementation of an effective climate strategy will help the bank not only manage risks, promote the climate transition and comply with the best international practices, but also find new opportunities for financing the "green" economy. The next section of the Report contains information about the main objectives of the climate strategy and plans to achieve them

In 2024, a system of material and non-material motivation related to the implementation of sustainable development practices for the bank's Management was developed and implemented. Among other things, KPIs in the area of climate change were identified: "Increasing the share of green financing in the total corporate portfolio", as well as "Accounting, analysis and reduction of own greenhouse gas emissions: Scope 1 and Scope 2".

Starting in 2023, the Bank is implementing credit risk assessment approaches that take into account the impact of sustainable development factors on the credit process. As part of the ESG Transformation project, tools have been developed and implemented to verify borrowers and projects for compliance with ESG principles and assess the risks associated with their activities. Progress in implementing the principles of responsible financing and the impact of climate risks on the Bank's lending activities is presented in section 2.5 of this Report.

The main resources consumed by the Bank are electric power, heat power and water. The Bank strives to reduce excessive resource consumption and minimise existing negative environmental impacts through the introduction of energy-efficient technologies, the transition to renewable energy, reduced water consumption, reduced paper consumption for office needs, garbage sorting, as well as other environmental initiatives, including the transition to electric vehicles in the fleet. These measures not only reduce the Bank's environmental footprint, but also strengthen its commitment to the principles of sustainable development in its corporate culture and daily processes.

The Bank does not have a significant impact on biodiversity, as it does not own any production facilities with a high level of environmental impact. The Bank also does not have facilities located in protected natural areas or areas with high biodiversity values.

Combating climate change

305-1, 305-2, 305-3, 305-4, SASB FN-CB-410b.4, IFRS S2

This section will discuss the Climate Strategy, goals and initiatives aimed at achieving carbon neutrality and supporting sustainable development in detail, as well as the main results of climate stress testing.

Climate strategy

In October 2024, the Bank's Board of Directors approved the Climate Responsibility Strategy of JSC Bank CenterCredit. The Climate Strategy is a strategic document containing goals and a set of measures and initiatives to achieve carbon neutrality by the bank.

The climate strategy was developed jointly with EY, the international consulting company. The science based targets initiative (SBTi), a sector-based approach that takes into account the specifics of economic sectors and their potential to reduce emissions, was chosen as the methodology for setting goals.

The strategy gives priority to building up the portfolio of green financing. In order to set goals for the green portfolio, an analysis of the market of green areas was carried out with the identification of priority types of activities/projects for financing. Three key categories were identified: Climate Solutions, Aligned/Aligning and Phaseout. The Climate Solutions category includes projects, companies, technologies, tools, and services aimed at reducing, capturing, and storing greenhouse gas emissions. The Aligned/Aligning category includes borrowers with high greenhouse gas emissions, with which the Bank will actively interact as part of its decarbonisation strategy. In the Phaseout category, the Bank is aware of the need to phase out financing activities related to high greenhouse gas emissions. It is planned to support and assist clients in projects for the early withdrawal of high-carbon assets from operating activities.

Renewable energy and sustainable agriculture have been identified as priority areas of the green economy for financing by the bank until 2030, with a potential market size of ~$3.5 billion by 2030 in the Republic of Kazakhstan. According to the results of the market analysis, goals were set for the portfolio of green financing, providing for the achievement of a target value of 400 billion tenge by 2030.

Dynamics of uniform growth of the BCC green portfolio to achieve the goals by 2030, in billion tenge

	2025	2026	2027	2028	2029	**2030**
The volume of the green loan portfolio	120	163	212	268	331	**400**

As of 31.12.2024, the valuation of the portfolio of green financing is 103.9 billion tenge (at the end of 2023, the estimate was 95 billion tenge). For consumer car loans (purchase of low-carbon cars), the portfolio is estimated at 3.6 billion tenge. The total cost of sustainable financing for corporate business is 91.2 billion tenge, for the SME segment – 9.1 billion tenge.

It is planned that the achievement of the set goals will be carried out through a number of developed initiatives. For example, financing targeted projects for sustainable development on special terms (new credit products), developing partnerships, as well as launching new retail green products.

As part of its strategic focus on building up its green loan portfolio, the Bank is taking active steps to seek and attract targeted green funding from international financial institutions and climate funds. Such sources, as demonstrated by international practice, provide banks with more favourable financing conditions, including due to the reduced cost of resources and extended terms of attraction.

In order to study best practices and establish partnerships, a working trip to Georgia is planned in 2025 to exchange practices with Georgian banks that are successfully implementing green financing mechanisms. The knowledge gained and contacts established will be an important step in ensuring the sustainable growth of the Bank's green portfolio and in achieving the goals of the climate strategy. The strategy also sets goals for reducing greenhouse gas emissions.

For financial sector companies, funded emissions (loan portfolio) represent the vast majority of the carbon footprint. Our decarbonisation efforts and the goals outlined below focus on funded emissions (Scope 3, portfolio emissions) as well as the Bank's own operations (Scopes 1, 2 and 3, non-portfolio emissions).

The Bank has set interim and long-term goals in accordance with a science-based approach to reduce the carbon footprint of both the bank's own operations and its funded corporate loan portfolio. By 2030, it is planned to reduce greenhouse gas emissions on Scopes 1, 2, 3 (non-portfolio) by 42% compared to 2023.



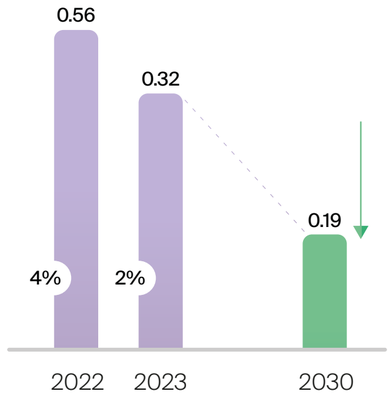
For funded emissions, targets have been set to reduce emissions by

42%

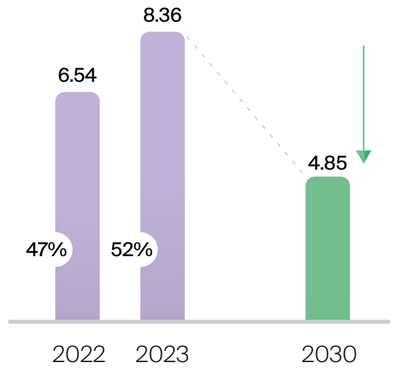
in key industries: energy, agriculture, metallurgy, manufacturing. The Bank's decarbonisation goals are extremely ambitious and ahead of national goals, demonstrating leadership in the ESG and sustainable development agenda.

The Bank's objectives are to reduce its own negative impact

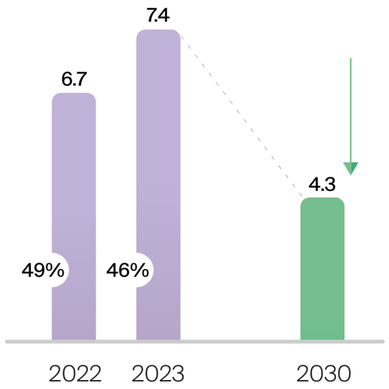
Coverage targets 1 by 2030



Coverage targets 2 by 2030



Scope 3 (non-portfolio) targets by 2030



To achieve these goals, a list of initiatives has been developed with established prioritisation. These initiatives primarily cover the Bank's activities, and some extend to the group level. Climate strategy management includes monitoring the achievement of goals, the status of initiatives, and clarifying goals where necessary.

The developed climate strategy is a significant step both for the bank and for the Republic of Kazakhstan in achieving the Sustainable Development Goals. Active implementation of the set goals and initiatives contributes to ensuring long-term prosperity for both the bank and society as a whole. The climate strategy, developed as part of a major ESG transformation, focuses not only on risk management, but also on the development and implementation of new opportunities in the green economy.

Bank CenterCredit case

"We have successfully developed and implemented a Climate Strategy, reaffirming our commitment to the principles of sustainable development and creating the conditions for innovative solutions and long-term growth.

This strategy strengthens the trust of our clients and partners, increasing overall business value for all stakeholders.

We will actively advance climate initiatives, regularly assess their impact, and maintain transparency in our engagement," noted Arnur Ibraev, Head of the ESG (Chief Sustainability Officer, CSO).

Climate stress testing

Climate stress testing is an important tool for assessing the Bank's resilience to climate change and related risks. The Bank conducted 2 types of stress testing to determine the Bank's exposure to climate risks:

- Stress testing of risks related to the climate transition, their impact on the financial metrics of the Bank's loan portfolio
- Stress testing of physical risks of floods and wildfires, their impact on the Bank's mortgage portfolio and key financial metrics

The top-level approach to conducting climate stress testing (top-down) involves assessing the aggregated effect on credit risk across a portfolio of legal entities, without analysing it at the level of individual large borrowers.

Two climate transition scenarios have been developed that adapt global macroeconomic indicators, taking into account cl imatic factors, to variables used in classical stress testing of credit risk in a Bank. This allowed to estimate how the TONIA variables and the real average monthly monetary incomes of the population will change for each of the scenarios on the horizon until 2050.

Scenarios used:

"Below 2°C": A positive climate scenario with a moderately ambitious climate agenda. Countries are starting to act now, which results in a higher level of transition risks up to a certain point, but the physical risks are eliminated by the end of the century.

"Current policies": A negative climate scenario, which implies rejection of the introduction of additional climate restrictions and evaluates the possible effect only from current policies.

Based on the results of stress testing of transition risk, a forecast was made for the following indicators:

- Probability of default (PD PIT, %) according to the scenarios for 2030 and 2050.
- The current balance of provisions under the scenarios for 2030 and 2050

To analyse the Bank's physical climate risks, two key physical risks relevant to the Republic of Kazakhstan were selected: floods and fires, based on international research. Stress testing of the Bank's mortgage portfolio has been carried out, as it is most susceptible to the consequences of physical risks. A comparison was made between the location of physical collateral assets and physical risk exposure zones for two physical risk scenarios RCP 2.6 and RCP 8.5 on the horizon of 2030 and 2050. For mortgage loans that fell into the high-risk category, the effect on the change in the LTV indicator in the event of a 50% and 25% depreciation of the value of collateral was assessed.

In the second half of 2024, the Bank's Risk Management Unit conducted another iteration of climate stress testing using a bottom-up approach. This methodology provides for a detailed assessment of the impact of climate scenarios at the level of each individual borrower, which allows for a more accurate understanding of the potential vulnerabilities and resilience of the Bank's corporate loan portfolio to climate risks.

The assessment was carried out taking into account:

- current financial status of clients
- sectoral trajectories of transition to a low-carbon economy according to climate transition scenarios
- the companies' stated plans for decarbonisation
- This approach allows to take into account both quantitative and qualitative parameters:
- The quantitative estimates are adapted to industry specifics, which ensures that the model assumptions are realistic.
- Qualitative assessments are calibrated taking into account the national context, including Kazakhstan's strategy to achieve carbon neutrality, expert judgements and other relevant climate and other data.

In the course of preparation:

- the integration of external and internal data sources, including the Refinitiv database, was carried out
- internal analytical data and credit information were used
- climate scenarios are modelled taking into account key factors:
- introduction of prices for CO emissions
- cost increase for fossil fuels
- investments in low-carbon technologies
- asset replacement and modernisation
- macroeconomic and other scenario assumptions (including those based on the Climate Biennial Exploratory Scenario Bank of England model) and their subsequent impact on clients' financial performance.

Based on an individual analysis of the largest corporate clients, the results were extrapolated to the entire corporate loan portfolio of the Bank.

Stress testing results

The conducted climate stress testing allowed to assess the potential impact of climate risks on the provisions for impairment and the Bank's capital:

- The amount of additional provisions is comparable to the results previously determined using the Top-down approach – climate risk analysis at the portfolio level.
- The capital adequacy ratio remains at the required level, which confirms the Bank's stability even in the event of adverse climate scenarios.

Climate stress testing made it possible to assess the potential risks and impact of climate change on the Bank's loan portfolio. The test results highlight the need to actively manage climate risks and develop strategies to minimise their impact. BCC will continue to work on improving methodologies and approaches to ensure the Bank's sustainability and stability in a changing climate.

Implementation of responsible financing principles

As part of its funded emissions management initiatives, in 2023, the Bank developed and implemented a Responsible Financing Policy, a document that describes the Bank's goals, principles, objectives, and approaches to responsible financing.

The responsible financing policy takes into account the best international practices, regulatory legal acts of the Republic of Kazakhstan, and a number of international principles and documents in sustainable development. Detailed information on climate risk management approaches is provided in Annex D.

It is planned to update the Responsible Financing Policy in 2025 based on the results of the GAP analysis of the bank's internal regulatory documents compliance with the new regulations in responsible financing approved in 2024. In particular, the policy will be supplemented and amended in accordance with the Methodological Guidelines on Environmental and Social Risk Management for Financial Institutions of the ARDFM and the Rules for the Formation of a Risk Management and Internal Control System for STB No. 188 of the NBRK, and the Responsible Financing Policy has been amended.

Greenhouse gas emissions

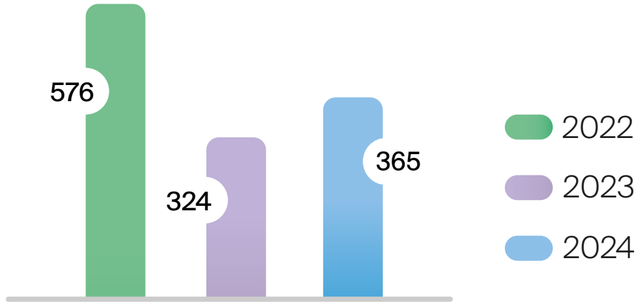
305-1, 305-2, 305-3, 305-4, SASB FN-CB-410b.4, IFRS S2

Scope 1 Greenhouse Gas Emissions

JSC Bank CenterCredit keeps records of direct greenhouse gas emissions from sources under its direct control.

In 2024, direct greenhouse gas emissions increased by 13%, primarily due to an increase in diesel fuel consumption compared to the previous year. Diesel fuel is used for stationary generators in the bank's offices. At that, in 2023, the decrease was achieved mainly by eliminating the use of freon, which was made possible by the initiative to modernise and switch to more modern and energy-efficient air conditioning systems. The ventilation system in the head office is presented in the form of air handling and exhaust units. In other buildings, ventilation is provided through local supply and exhaust systems, as well as naturally. There was no consumption of freon in 2024.

Direct emissions, Scope 1, tons CO_2 equivalent.





Detailed information on the dynamics of motor fuel consumption and actions to improve energy efficiency is provided in Section 8.4 "Energy consumption and energy efficiency" of this Report.

Scope 2 Greenhouse Gas Emissions

The Bank's indirect greenhouse gas emissions are related to the consumption of electric power and heat purchased from external suppliers. When calculating greenhouse gas emissions for Scope 2, boundaries were defined that include buildings managed by the Bank. The calculation was performed using a territorial (local-based) method for estimating indirect greenhouse gas emissions in accordance with the GHG Protocol. To use the territorial method for 2023, national coefficients determined by benchmarks are used in regulated sectors of the economy; for the assessment for 2024, the coefficients were clarified taking into account data on the structure of the electric power industry of the Republic of Kazakhstan[24]. According to the estimate for 2024, the total amount of greenhouse gas emissions in Scope 2 amounted to 6,933 tons of CO2 equivalent, a decrease of 17% compared to the estimate for 2023.

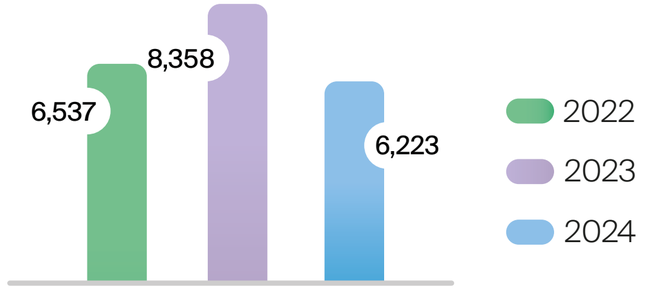
Reducing fuel and energy consumption is one of the Bank's strategic objectives as part of its sustainable development strategy.

In 2024, an action plan was approved with recommendations based on the results of the energy audit of the facilities of JSC Bank CenterCredit with a deadline of five years (2024-2028). In 2024, a number of activities were completed. At the beginning of 2025, one event is planned from the list of economically mandatory initiatives and 14 from the list of recommended ones, which are planned to be completed by 2027.

Despite the implementation of energy efficiency measures, electric power consumption decreased slightly in 2024. This is primarily due to the expansion of the business: in 2024, the load in terms of electric power consumption is associated with an increase in the load on server equipment in the Data Processing Center located at the Bank's head office. This building, being the most energy-intensive facility, consumes about 500,000 kW of electric power per month, which accounts for most of the Bank's total consumption. In addition, a 2-fold increase in the fleet of electric vehicles was recorded in 2024. Additional five chargers for electric vehicles have been installed on the bank's territory in addition to the previously installed six chargers. In terms of heat consumption, the largest volume also falls on the Bank's head office. The reduction in heat consumption is due to the fact that two buildings were transferred from the Bank's balance sheet in connection with their sale. The Bank strives to reduce its impact on the climate not only through energy conservation and energy efficiency measures in the area of traditional energy resources, but also by switching to the consumption of environmentally friendly, renewable ("green") energy. The consumption of 1 million kWh of electric power was provided by renewable energy generation, which is confirmed by the purchase of green certificates of the I-REC system. The total share of green energy in the Bank's electric power consumption was 16% in 2024.

The final assessment of greenhouse gas emissions is carried out taking into account the purchase of renewable energy certificates, which makes it possible to compensate for the carbon footprint of the organisation and helps reduce the negative impact on the environment. Due to the lack of official data on the residual mix in the country, we used available regional emission factors to calculate emissions using the market-based methodology. The total amount of greenhouse gas emissions from Scope 2, taking into account I-REC certificates, amounted to 6,223 tons of CO2 equivalent, which is 10% lower than the estimate compared to the territorial approach.

Indirect emissions, Scope 2, tons of CO2-eq.



[24]https://www.kegoc.kz/ru/electric-power/natsionalnaya-energosistema/

Intensity of greenhouse gas emissions

Information on emissions for Scope 1 and Scope 2 is defined within the boundaries of facilities, i.e. buildings under management (ownership) of the Bank.

For 2024, the greenhouse gas emission intensity coefficient was

0.86 tons of CO_2 equivalent per employee

(in 2023: 1.09 tons of CO2 equivalent per employee).

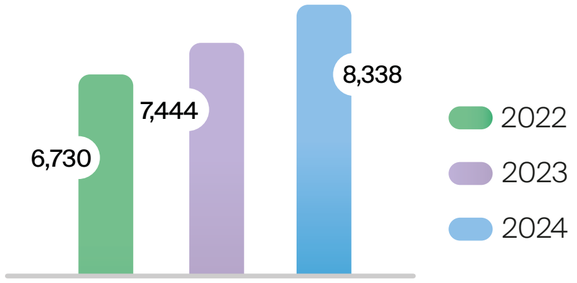
Scope 3 Greenhouse Gas Emissions

SASB FN-CB-410b.4

The Bank also keeps records of other indirect greenhouse gas emissions of Scope 3, which are classified as Upstream and Downstream emissions.

Upstream emissions include all emissions related to obtaining the resources required for banking, emissions resulting from the purchase of goods and services, as well as operations related to fuel and energy consumption, movement and business trips of employees, rented premises.

Indirect emissions of Scope 3 (Upstream), tons Co_2-eq.



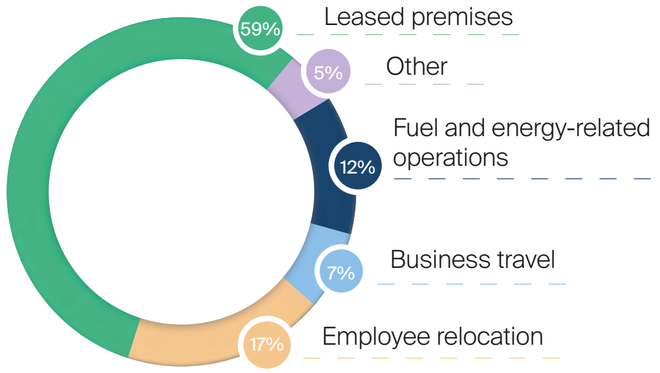
By the end of 2024, emissions from Scope 3 (Upstream) amounted to 8,338 tons of CO2, an increase of 12% compared to last year.

The main sources of Scope 3 (Upstream) emissions for the Bank are leased premises: rental of business centers and office space, relocation of employees and business trips of Bank employees, as well as operations related to fuel and energy, indirect emissions related to electric power losses. The estimate of emissions from employee travel from home to work and back (employee relocation) increased in 2024 due to an increase in the coverage of the assessment (previously, the assessment was carried out at the company's head office, in 2024 a similar assessment approach was applied to the actual number of employees of the Bank, taking into account branches). The changes in other categories are not significant. In 2025, the Bank will continue to refine its approach to estimating and reducing indirect Upstream greenhouse gas emissions.

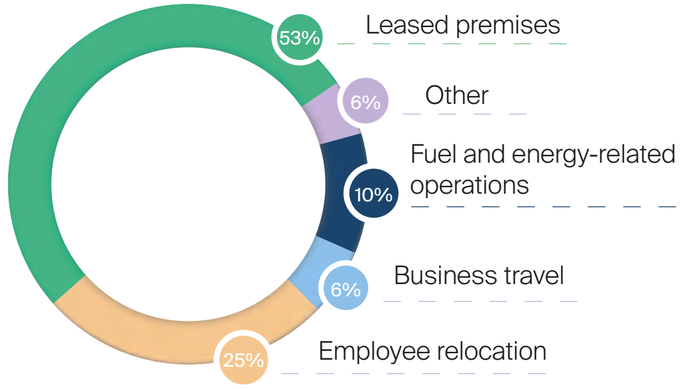
JSC Bank CenterCredit recognises that for financial sector companies, funded emissions (loan portfolio) represent the vast majority of the carbon footprint.

Emissions related to financing of external projects (Downstream) or financed emissions include the assessment of emissions due to the provision of capital or financing of client companies, which in turn are emitters of greenhouse gases.

Scope 3 Upstream-2023



Scope 3 Upstream-2024

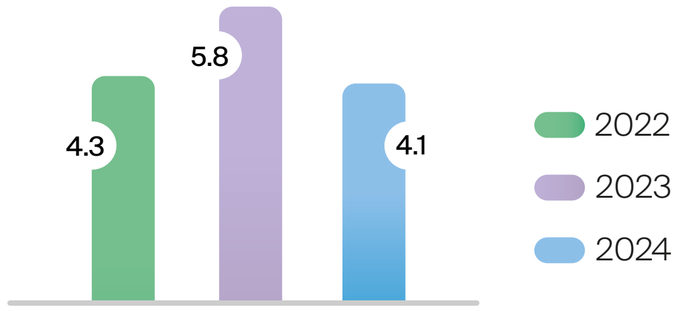


Funded emissions are greenhouse gases that are released outside the direct activities of the Bank, but are also associated with the implementation of investment projects and lending to companies from various sectors of the economy.

The Bank takes an active part in assessing the environmental sustainability of funded projects and strives to ensure that its investment activities contribute to the transition to a low-carbon economy.

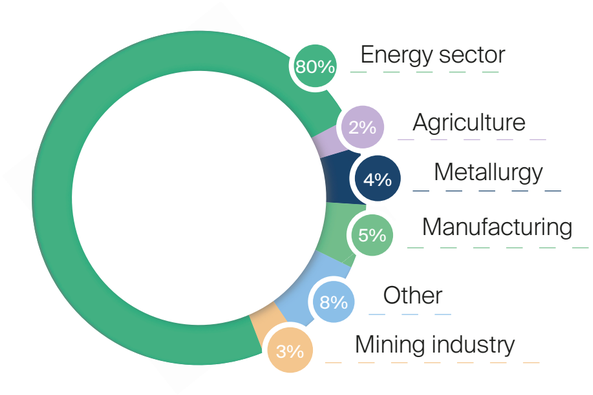
In 2023, the Bank first published information on the assessment of the level of funded emissions, they amounted to 5.8 million tons of CO2-eq. According to estimates for 2024, the bank's funded emissions are estimated at 4.1 million tons of CO2-eq. Despite the growth of the investment portfolio, the indicator's estimate is lower than the previous year, due to the refinement of the approach to estimating emissions from energy projects, the use of non-financial reporting data and the assessment of industry coefficients.

Indirect emissions of Scope 3, Downstream, million tons of CO_2-eq



The funded emissions by industry are also set out below:

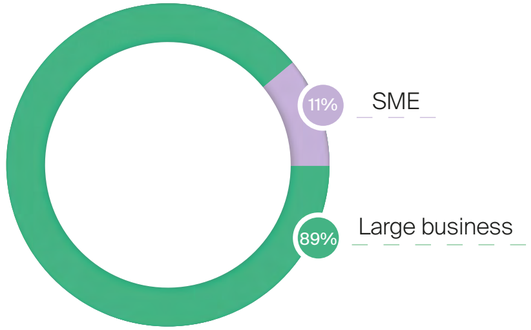
Scope 3 (Downstream) by business sector



Energy sector is the main source of emissions, as well as the manufacturing, metallurgical, mining and agriculture sectors. The "other" category includes all other industries.

The energy sector is traditionally carbon-intensive. In order to correctly assess the amount of emissions from financing companies in the energy sector, the Bank is working on emissions analysis for specific projects of clients. In particular, the assessment of greenhouse gas emissions from major projects was carried out on the basis of and evaluation of the results

Scope 3 (Downstream) by business segments



In terms of business segments, in the reporting period, the corporate segment accounted for the majority of portfolio emissions: 89% compared to small and medium-sized businesses, which accounted for only 11% of the Bank's portfolio emissions.

JSC Bank CenterCredit uses the PCAF (Partnership for Carbon Accounting Financials) standard under the International Greenhouse Gas Protocol (GHG Protocol) to calculate and report on greenhouse gas emissions This standard makes it possible to more accurately measure and manage GHG emissions related to financial activities. The Bank used an assessment approach based on simplified national GHG emission coefficients, which are estimated using data from the Fuel and Energy Balance, the IPCC classification according to the OKED, as well as information from the Input-Output Table to estimate emissions per unit of revenue. To update the coefficients, an adjustment for inflation was made.

The assessment of greenhouse gas emissions from large projects was carried out on the basis of non-financial reporting by clients and assessment of the results of filling out questionnaires for large corporate clients mainly from carbon sectors of the economy.

PCAF Partnership for Carbon Accounting Financials

GREENHOUSE GAS PROTOCOL

The Bank strives to follow international standards in reporting and management of environmental risks and climate impacts and is actively working to reduce the negative impact on the climate throughout the value chain. This underscores the Bank's commitment to sustainable development goals and contributing to the implementation of the national strategy to achieve carbon neutrality in the Republic of Kazakhstan by 2060.

Waste management and water consumption

GRI 3-3, 303-3, 303-4, 303-5, 306-2, 306-3, 306-4

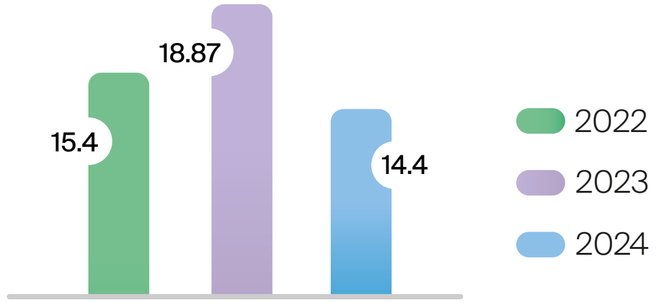
Water consumption

GRI 3-3, 303-3, 303-4, 303-5

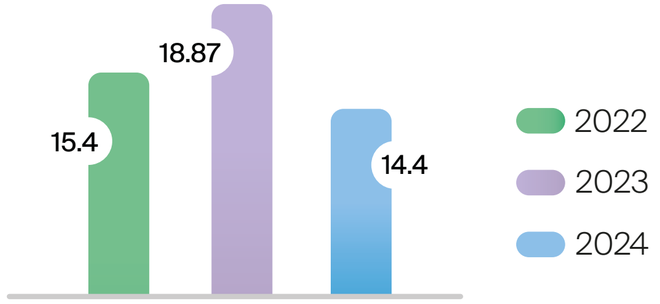
The Bank consumes all necessary water from municipal water supply systems, and in addition to this source, no other sources of water consumption are used. The total amount of cold, hot, and process water consumed in all buildings owned by the Bank is indicated in the general accounting of water consumption. Water is discharged only into municipal water supply systems (sewers). The decrease in consumption is mainly due to the fact that during the year three buildings were transferred from the Bank's balance sheet in connection with their sale. Efficient water consumption programs are also being implemented.

During the period under review, the volume of water withdrawn by the Bank does not exceed the volume of water consumption. A slight excess in water consumption relative to wastewater disposal is usually due to the presence of irretrievable losses (leaks and water consumption for watering green spaces).

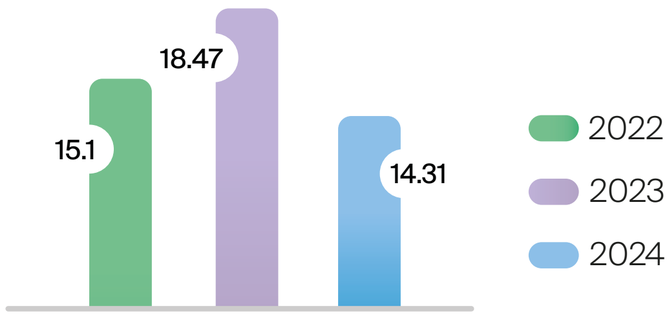
Total amount of water withdrawn, thousand m³



Total amount of water consumption, thousand m³



Total amount of wastewater disposal, thousand m³



Waste management

GRI 306-2, 306-3, 306-4

- One of the directions of the Green Office project is waste management. During the implementation of the "Divide the waste! We have no other planet" Project, a system of separate waste collection is being implemented in the Bank's offices. Since 2023, BCC has been implementing work on the implementation of a separate waste collection system in its offices in all regions of its presence.

Since the start of the project, the following steps have been implemented:

- 2023: An agreement was signed with Ecosen to organise the export of separately collected recyclables for subsequent processing to specialised enterprises in Almaty.
- 2024: A cooperation agreement was signed with the ECO NETWORK company in order to scale the project across the Bank's branch network.
- A separate waste collection system has been introduced in 14 regions: Astana, Ust-Kamenogorsk, Aktau, Shymkent, Uralsk, Aktobe, Karaganda, Petropavlovsk, Pavlodar, Kostanay, Kyzylorda, Taldykorgan, Regional branch, Semey.

ecosen

PLASTIKTI QAITA ÓŃDEÝDI QOLDA

ECO NETWORK

Also, as part of the project, the Bank conducts staff training on the implementation of a separate waste collection system from partner organisations, prepares newsletters and instructions for employees in order to organise effective separate waste collection.

The bank is building processes for collecting and monitoring waste recycling data. Recyclables are transferred according to the transfer acceptance certificate, and data collection is monitored through an application and a web platform for accounting and monitoring waste disposal and recycling processes.

In terms of liability, all contracts with third parties contain waste management obligations and confidentiality agreements are signed.

The Bank supports the implementation of activities aimed at improving environmental education, popularising the value of plastic as a secondary raw material, as well as the importance of its processing for the Planet. Such green initiatives of the Bank demonstrate its fundamental commitment to reducing the negative impact on the environment and supporting sustainable development.

The Bank plans to continue expanding the Green Office project and other projects aimed at improving environmental responsibility and increasing its contribution to public environmental programs.

The total amount of waste generated in 2024 was 103.25 tons. At that, the amount of hazardous waste generated in the Bank, such as batteries, is 45 kg, they are transferred for recycling and neutralisation. Below is a graph of the total amount of non-hazardous waste generated by the Bank in 2024.

In 2024, the Bank allocated 100% of the generated waste for disposal, information on which is presented in this section. The waste was properly disposed of by a specialised contractor, which underscores BCC's commitment to the principles of sustainable development and minimising environmental impacts.

Bank CenterCredit case

Bank at the Green Energy Forum

In October 2024, the Bank participated in the VIII Eurasian Business Forum "Green Energy & Waste Recycling Forum'24", an annual event in Central Asia for the development of "green" business, efficient waste management and renewable energy.

The Bank's employees participated in the forum's training events on financial stability in waste management, improving the level of plastic collection and recycling, innovative technologies in the waste collection, sorting and recycling sector, integrated waste management at the local level, sustainable industrial waste management based on ESG standards, methods and approaches, as well as problems and solutions for small and medium-sized businesses in this area.

Little masters of big business

In June 2024, an Eco-workshop on creating key chains and brooches made of recycled plastic was organised for the youngest clients of Junior Card and Junior Bank. The master class was timed to coincide with the celebration of International Children's Day and World Environment Day. The children learned about the importance of separate garbage collection, how and why to recycle plastic, and made more than 100 products from recycled plastic with their own hands.

The second life of plastic: from waste to art

The Bank, together with Plastic Hara Hura, has participated in plastic recycling projects, including the use of office supplies made from recyclable materials and the manufacture of branded watches from plastic bottle caps. Our partners are a design and manufacturing studio, where works of art, furniture and interior items are created from recycled plastic, located in Almaty, Kazakhstan.

Waste generation in Bank offices and branches, tons

Name	2023	2024
Non-hazardous waste	**190.35**	**103.25**
Furniture, equipment and office equipment	145.58	62.11
Scrap metal	25.93	18.58
Waste paper	13.92	15.54
Glass	2.58	3.25
Plastic	2.12	3.32
Aluminum	0.22	0.46
Hazardous waste	**0.14**	**0.045**
Fluorescent lamps	0.11	0
Batteries	0.035	0.045
Total weight of generated hazardous and non-hazardous waste	**190.49**	**103.30**

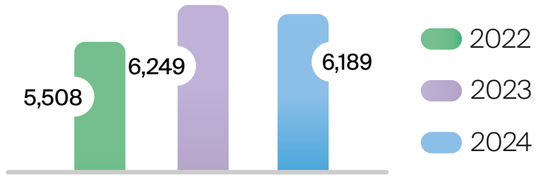
Energy consumption and energy efficiency

GRI 3-3, 302-1, 302-3, 302-4

Total electric power consumption amounted to 6,188,789 kWh, the volume of consumption decreased slightly compared to the prior period.

The head office is the most energy-intensive facility, consuming about 500,000 kilowatts of electric power per month, which accounts for a significant proportion of the Bank's total energy consumption.

Total electric power consumption, Mwh



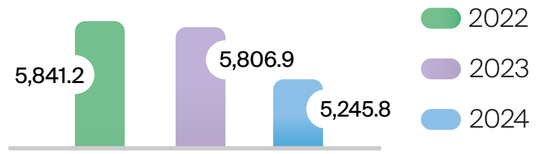
In 2024, the reduction in electric power consumption was insignificant. The main reasons are:

- The increase in the number of employees on average for each individual building compared to 2023.
- Increased load on the server equipment of the Data Processing Center located at the Bank's head office.
- Doubling the fleet of electric vehicles has resulted in the installation of five additional chargers to the existing six.

At that, a number of energy efficiency measures within the framework of the recommendations of the Energy Audit for 2023, as well as the implementation of some buildings, resulted in a final decrease in the indicator for the period.

In 2024, a decrease in total heat energy consumption was recorded to 5,245.8 Gcal compared to 5,806.9 Gcal in 2023. In order to optimise the heating costs of the head office building, in 2024, measures were taken to connect controllers for regulating the temperature of the coolant supply from urban networks to the building's dispatching system. Thus, on relatively warm winter days, it is possible to lower the temperature to maintain optimal climatic conditions inside the office. The reduction in heat consumption is due to the fact that three buildings were transferred from the Bank's balance sheet in connection with their sale.

Heat consumption, Gcal



In order to monitor energy efficiency, specific indicators were calculated for two key types of energy consumed: electric power and heat. Based on the specifics of banking activities, which are not characterised by a high level of energy consumption, the heated area of buildings owned by the Bank was chosen as the denominator for calculating the ratio.

In 2024, the specific[25] indicator of electric power consumption was 158.18 kWh/m2, which is 20% higher than in the previous year, which was 131.3 kWh/m2. The increase is due to an increase in electric power consumption at the bank's Head Office. The specific indicator of heat energy consumption was 0.134 Gcal/m2 in 2024 compared to 0.122 Gcal/m2 in 2023, which shows an increase of 9.8% compared to the previous reporting period. In the current period, it has not been possible to achieve a reduction in the specific indicators of electric power and heat consumption, while programs are planned that are aimed at optimising the use of energy resources.

In order to analyse energy efficiency, the Bank evaluates the dynamics of motor fuel consumption at the Bank's facilities (managed or owned by the Bank). According to the results of the analysis for the two main types of fuel used: gasoline used for motor vehicles and diesel fuel used in diesel generators serving as backup power sources, the total gasoline consumption in 2024 increased to 154 thousand liters compared to 140 thousand liters in the prior year. There was also an increase in the use of diesel fuel from 2,300 liters in 2023 to 4,030 liters in 2024. The high volume of diesel fuel consumption is associated with the use of diesel generators during periods of emergency power outages to ensure the smooth operation of the Bank's key operations.

The Bank acquires fuel and energy resources through third-party organisations. The Bank does not supply electric power to third parties.

Summary information on the use of energy resources

Indicators	Unit of measurement	2023	2024	Unit of measurement	2023	2024
Electric power	MWh	6,249	6,189	GJ	22,497	22,280
Heat power	Gcal	5,807	5,246	GJ	24,313	21,964
Gasoline	liter	140,089	154,336	GJ	4,592	5,059
Diesel fuel	liter	2,300	4,030	GJ	84	147
Total				GJ	**51,487**	**49,450**

Measures to reduce energy consumption

GRI 302-4

By the end of 2023, the Bank conducted an energy audit of its own buildings on the Bank's balance sheet. As a result, an action plan was approved with recommendations based on the results of the energy audit of the facilities of JSC Bank CenterCredit with a deadline of five years (2024-2028). In 2024, a number of measures were implemented, for example, the transition to the use of LED lamps in the front and back offices of the Bank has been implemented by 95%. Also, during the year, three buildings were transferred from the Bank's balance sheet in connection with their sale.

A summary of the measures developed and an assessment of their effectiveness are presented in the Sustainability Report for 2023.

At the beginning of 2025, one event is planned from the list of economically mandatory initiatives and 14 from the list of recommended ones, which are planned to be completed by 2027.

In particular, measures are planned to install electric power metering devices and modernise the lighting system in several of the bank's own buildings.

[25] The value of the bank's office space for 2023 and 2024 was used as a parameter in the denominator for calculating the specific energy intensity.

centercredit
2024 Sustainability Report



Message from the Chairman of the Board of Directors

Message from the President

1. About the Report
2. Corporate governance
3. Bank's contribution to achieving UN Sustainable development goals
4. Respect for human rights, business ethics and anti-corruption
5. Interaction with customers and suppliers
6. Interaction with personnel
7. Responsibility to society
8. Environmental responsibility

Annexes

Annex A:
Identifying of material topics and impacts

Annex B:
Index of GRI content

Annex C:
IFRS S1 Disclosures

Annex D:
IFRS S2 Disclosures

Annex E:
SASB Industry Indicators

Annex F:
Supplementary information

Annex G:
Independent Auditor's report

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Glossary of Terms

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Contacts

Annex A: Identifying of material topics and impacts

GRI 2-4, 2-14, 3-1, 3-2, 3-3

JSC Bank CenterCredit annually updates the list of significant sustainable development topics. This process is aimed at ensuring comprehensive disclosure of information of interest to a wide range of stakeholders, as well as having a significant impact on the Bank's operations. The process of identifying the Bank's essential topics includes four successive stages, each based on a transparent methodology and taking into account the views of stakeholders.

Stage 1. Identifying of material topics

- benchmark analysis of Kazakhstan and foreign leaders of the sustainable development of the financial industry.
- analysis of international GRI and SASB standards in the context of the Bank's impacts.
- taking into account the industry-specific features of the formulation of essential topics based on the Guidelines of the RFBR.
- study of key trends in the banking sector, as well as research by international agencies.
- assessment of the positive and negative, current and potential impact of the Bank on the economy, environment and social aspects.

Stage 2. Stakeholders survey

According to the results of the analysis of the first stage, a wide list of 23 topics was identified for 3 impact groups:

E – Environmental

S – Social

G – Governance

A survey was conducted among 162 representatives of internal and external stakeholders, including the Bank's senior management, employees, the professional community, business partners, clients, representatives of non-profit organisations, rating agencies and the media. Each participant was asked to rate each topic on a five-point scale, taking into account its breadth of coverage, significance, reversibility of consequences, and likelihood of occurrence. Then, based on the scores received, a preliminary sorting of topics was carried out according to their degree of priority.

Stage 3. Prioritisation of topics

In 2024, the key change affecting the final list of significant topics is the additional expert assessment in terms of its impact on the Bank's operations both in the short and long term. Points were awarded based on the scale of the topic's impact on key aspects of the Bank's work. The Bank has identified key strategic topics that it influences and which, in turn, significantly affect its operations. In this regard, in the current reporting period, a number of topics that were recognised as significant in the previous year were not included in the current list. This is due to the clarification of the evaluation criteria, as well as a change in the priorities of stakeholders. However, these changes do not affect the completeness and information content of this report – all key aspects of the company's sustainable development are reflected in accordance with current expectations and requirements.

In order to ensure meaningful disclosure, the Bank has set the materiality threshold at 85% of the total estimate. This approach is consistent with international practices and allows to identify topics of the greatest importance to stakeholders, which have a significant impact on the strategic and operational development of the Bank, as well as those requiring systematic management and transparent disclosure. As a result of the analysis, 11 priority topics were identified, reflecting key risks and opportunities, as well as meeting the requirements of GRI standards and the expectations of an external audience.

Justification of the choice of the 85% significance threshold

The 85% significance threshold was chosen based on an analysis of the distribution of importance of all 23 topics in order to identify the most priority areas of sustainable development. This level was set for the following reasons:

1. A clear inflection point in the distribution:

When ranking topics in descending order of importance, there is a sharp decrease after the 85% mark. Topics with 85% and above demonstrate a dense group (from 85% to 90%), while the next group (84% and below) is characterised by more diffuse and less pronounced values. This indicates a natural boundary between topics of high and moderate importance.

2. Minimising information loss during cutoff:

At the 85% threshold, 11 topics are prioritised, and none of the topics with 84% or lower have unique content that is not covered by the topics already included. This means that information losses during cutoff are minimal, and the coverage of key aspects is preserved.

3. Optimisation of handling and focus:

Choosing 85% allows to limit the number of priority topics to less than half of the total (11 out of 23), which makes them realistic for strategic management, monitoring and disclosure. A lower threshold (for example, 80%) would result in the inclusion of 17 topics, which would blur the focus and complicate the implementation of initiatives.

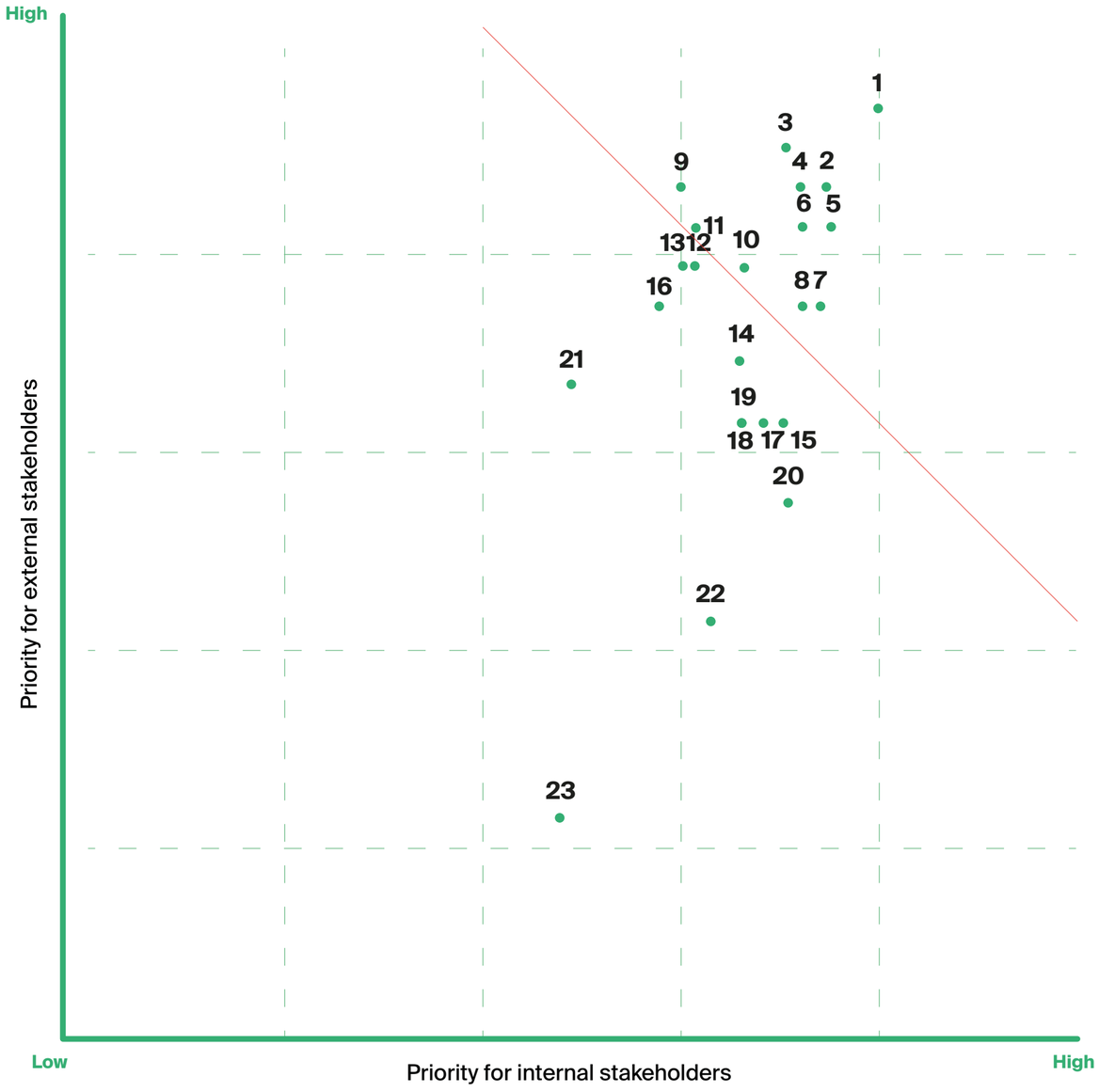
4. Confirmation through cumulative analysis:

The cumulative amount of the significance of the first 11 topics (≥85%) is almost 1000%, which is equivalent to 43% of the total significance of all topics. This confirms that the chosen threshold covers the most significant part of the stakeholders' perception.

5. Consistency with industry practices:

ESG reporting in the financial sector often uses an approach in which topics in the upper quartile or quintile of importance are considered priorities. In this case, 85% corresponds to the upper ~48% of what fits into this methodology.





Priority	Aspect	Topic	Evaluation
1	Social aspect	Customer satisfaction*	4,6
2	Economic and management aspect	Digitalisation and innovation	4,5
3	Economic and management aspect	Economic performance	4,5
4	Economic and management aspect	Risk management*	4,4
5	Social aspect	Staff training and development	4,4
6	Economic and management aspect	Information security**	4,4
7	Economic and management aspect	Availability of financial products and services	4,3
8	Social aspect	Workplace safety and health	4,3
9	Ecological aspect	Climate change*	4,3
10	Economic and management aspect	Corporate governance**	4,3
11	Economic and management aspect	Anti-corruption management	4,3
12	Economic and management aspect	Business ethics	4,2
13	Social aspect	Labour practices	4,2
14	Social aspect	Contribution to social development of regions	4,1
15	Social aspect	Human rights***	4,1
16	Economic and management aspect	Interaction with stakeholders	4,1
17	Economic and management aspect	Responsible financing	4,1
18	Ecological aspect	Waste management***	4,1
19	Social aspect	Equal opportunities	4,1
20	Ecological aspect	Energy efficiency***	4,0
21	Economic and management aspect	Responsible supply chain	3,9
22	Ecological aspect	Water consumption***	3,8
23	Ecological aspect	Biodiversity	3,3

* new topic compared to the 2023 Report
** topic renamed compared to the 2023 Report
* ** topic from the 2023 Report not included in the 2024 list

Indicator	The most material topics affecting the Bank's activities		
Material topic	Customer satisfaction	Economic performance	Digitalisation and innovation
Strategic goal	Increase the activity and loyalty of current clients to the Bank	Maintain a leading position in profitability indicators and significantly improve business performance indicators	Ensure a competitive level of digitalisation: both internal and external
Business impact	Very high Impact on customer retention, revenue growth, and the bank's reputation	Very high Impact on financial stability, profitability and investment attractiveness	Very high Impact on efficiency, improve customer experience and ensure competitiveness

Indicator	The most significant topics influenced by the Bank		
Material topic	Availability of financial products and services	Customer satisfaction	Economic performance
Strategic goal	Expanding reach and inclusivity through digital solutions	Improving the quality of service and customer experience	Sustainable growth and profitability through effective management
Impact on stakeholders	Very high The Bank promotes financial engagement of the population and SME	Very high The Bank influences the level of trust and well-being of customers	Very high The Bank supports economic stability and the development of society

Stage 4. Approval of mandatory disclosure of material topics.

The final list of material topics was approved by the Bank's top management at the Committee for Sustainable Development under the Board of Directors.

For each of the priority topics, relevant GRI indicators were identified for detailed disclosure. The selected substantive topics reflect the main directions of the Bank's activities in the context of sustainable development. In addition, the Bank has integrated the materiality assessment process into its risk management system as part of its annual risk identification (Enterprise Risk Management, ERM).

This approach ensures the systematic identification, analysis and monitoring of sustainable development topics that may have an impact on the bank's business model, financial results and reputation.

ESG KPIs have been established for the Bank's top management on the most significant topics, which ensure the strategic orientation and personal responsibility of management for achieving sustainable development goals.

Bank CenterCredit case

Quantitative metrics for evaluating key topics

The Bank uses quantitative metrics to assess the impact of key topics on society and the economy:

Customer satisfaction

The impact on customers is estimated using:

1. Net Promoter Score (NPS):
- 23% among individuals
- 28.4% among legal entities
2. Customer Satisfaction Index (CSI):
- 7.8 for individuals
- 8.0 for legal entities

For more information, see “Customer focus, availability of financial products and quality of rendered services” section.

Economic performance

The bank's impact on the economy is measured through:

1. Net profit: 194 billion tenge by the end of 2024
2. Investment grade of credit ratings
3. P/B ratio (price/book value)

Topic	Positive impact	Negative impact	The impact at the moment	Future impact
Customer satisfaction	Increase customer satisfaction due to the high quality of the services provided.	Reduced customer satisfaction in case of ineffective or substandard complaint management, customer interaction, as well as failures or deficiencies in the services provided, including technological aspects.	The Bank is actively implementing digital solutions, including virtual assistants and automated processes, which makes it possible to increase the speed of service, reduce the burden on operators and ensure round-the-clock availability. The level of customer satisfaction is consistently high, which is confirmed by internal metrics and feedback.	In the face of increasing competition and digitalisation, customer expectations will continue to grow. To maintain a high level of satisfaction, the Bank will need to strengthen personalisation, develop omnichannel solutions, increase transparency and speed of interaction, and take into account ESG factors in the customer experience. This will be a key factor in customer retention and loyalty growth.
Digitalisation and innovation	Accelerate business transformation and promote long-term development of companies. Spreading an innovation-oriented culture through events and the introduction of new educational formats.	Potential inability to promote and manage innovation and digital transformation processes, which may result in customer dissatisfaction and/or loss of market segments.	The Bank is actively implementing digital technologies, from automating credit solutions and implementing virtual assistants to using large language models (LLM) and building MLOps infrastructures. These initiatives have already resulted in increased operational efficiency, reduced request processing time, improved customer experience, and expanded digital channels of interaction.	In the future, digitalisation will become a key factor for sustainability and competitiveness. The bank will strengthen the integration of AI into business processes, develop omnichannel platforms, introduce personalised digital services and strengthen data protection. Digital innovations will also play an increasing role in ESG initiatives and in the creation of new products focused on sustainable development and inclusivity. Successful digital transformation will ensure the growth of the customer base, lower costs and increase the flexibility of the business.
Economic performance	Revenue, profit and profitability growth due to the introduction of innovative solutions, automation of processes, expansion of the customer base and improvement of operational efficiency. Strengthening financial stability and investment attractiveness.	Exposure to external economic shocks, inflation, fluctuations in exchange rates and interest rates. Possible losses due to inefficient asset management, risks, or insufficient adaptation to market changes.	The Bank demonstrates stable growth in key financial indicators, including profit, loan portfolio volume and operational efficiency. The introduction of AI and digital solutions helps to reduce costs and increase revenue. There is also an increase in the share of sustainable and responsible financial products.	In the future, economic performance will depend on the Bank's ability to adapt to changes in the global and local economies, implement sustainable business models, and develop digital channels and ESG areas. Sustainable growth is possible with effective risk management, investment in innovation, and maintaining the trust of customers and investors.
Risk management	Reducing the likelihood of financial, operational, regulatory, and reputational losses. Increasing the sustainability of the business and the trust of investors and customers. Improving the quality of decision-making.	High costs for building and maintaining risk management systems. Possible errors in models or insufficient adaptation to new types of risks (for example, ESG, cyber risks).	The Bank has implemented effective risk management systems, including MLOps infrastructure, model monitoring, data quality control, and regulatory compliance. AI tools are actively used to assess credit and operational risks, as well as to prevent fraud.	In the future, risk management will become even more complex and technologically advanced. Regulatory requirements are expected to increase, as well as the importance of ESG risks, cyber threats, and AI-related risks. The Bank will develop predictive models, automated monitoring and adaptive management systems, which will allow timely response to changes and maintain stability in the face of uncertainty.
Staff training and development	Professional development, employee engagement and motivation. Development of internal competencies, improvement of productivity and quality of customer service. Career development support and talent retention.	High training and development costs, especially when scaling. The risks of ineffective programs and the inconsistency of the training content with current and future business needs.	The Bank implements active training programs, including digital tools, AI assistants, and internal development platforms. The level of digital literacy, managerial and technical skills of employees is increasing. Learning is embedded in the processes of transformation and sustainable development.	In the future, learning will become a continuous process integrated into daily activities. The role of personalised and adaptive learning based on data and AI will increase. There will also be an increased focus on ESG competencies, digital skills, and leadership. Effective staff development will become a key factor in the bank's sustainability and competitiveness.
Information security	Ensuring the protection of customer data and operations, reducing the risks of cyber attacks, and increasing trust on the part of customers and regulators. Support for digital transformation and business sustainability.	Disruption of IT systems, leakage of confidential information, intentional and/or unintended incidents that can damage reputation, cause financial losses and affect customers and partners.	The Bank has implemented modern cybersecurity measures, including protection of cloud services, data encryption, anomaly monitoring and access control. We use our own encryption keys and personal data protection policy. Projects have also been implemented to anonymise data and protect AI models from leaks.	In the future, the complexity and frequency of cyber threats will increase, especially in the context of the active introduction of AI and digital services. The Bank will strengthen infrastructure protection, develop predictive threat analysis systems, automated monitoring and response. Cybersecurity will become an integral part of the ESG strategy and a factor of trust on the part of customers, investors and regulators.
Availability of financial products and services	Expanding the coverage of the population with financial services, including vulnerable and remote groups. Increasing financial inclusion, growing the customer base, and supporting small and medium-sized businesses.	The risks of customer insolvency, especially in segments with a low level of financial literacy. The possibility of increasing social inequality with insufficient adaptation of products to the needs of different groups.	The Bank offers a wide range of products available, including automated credit solutions, digital channels, and personalised offers. AI models are used to assess solvency and reduce barriers to entry.	In the future, accessibility will be determined by the Bank's ability to adapt products to the needs of different segments, including the elderly, youth, the self-employed, and rural residents. The growth of digitalisation requires parallel improvement of financial literacy and inclusivity. The role of ESG factors in designing financial solutions will also increase.

Topic	Positive impact	Negative impact	The impact at the moment	Future impact
Workplace safety and health	Improving the psycho-emotional and physical well-being of employees. Improving work-life balance through various initiatives.	Decrease in the psycho-emotional and physical well-being of employees.	The Bank implements initiatives to ensure a safe and comfortable working environment, including digital support tools, flexible schedules, and occupational health and safety programs. A culture of caring for employees is maintained.	In the future, an integrated approach to employee well-being, including mental health, flexibility, inclusivity, and digital ergonomics, will increase in materiality. The Bank will develop support programs, automated monitoring of working conditions and initiatives for sustainable HR management, which will become part of the ESG strategy and a talent retention factor.
Climate change	Promoting initiatives on energy efficiency and the use of renewable energy sources within the organisation, which results in a reduction in atmospheric emissions. Gradual reduction of greenhouse gas emissions and other substances that deplete the ozone layer by taking into account climatic aspects when providing loans and forming a loan and investment portfolio.	The negative impact on climate change is carried out through direct and indirect greenhouse gas emissions, including as a result of a potential increase in energy consumption.	The Bank has an impact on climate change both through direct operational emissions and through funded emissions related to the loan portfolio. At that, initiatives are being implemented to improve energy efficiency and use renewable energy sources, which helps reduce atmospheric emissions. The bank measures CO_2 emissions according to the PCAF methodology and offers products such as solar panel financing, which allows it to track prevented emissions and the social cost of carbon.	In the future, the Bank's impact on the climate will be determined by the scale and depth of the transformation of its business model towards a low-carbon economy. The commitment to achieve a carbon-neutral loan portfolio implies a significant reduction in funded emissions. It is expected that the share of green products will increase, climate requirements for borrowers will increase, and climate risks will be integrated into credit solutions, which will enhance the positive impact on the climate and reduce reputational and regulatory risks.
Corporate governance	Increased trust from investors, customers, and regulators. Ensuring transparency, accountability and sustainability in decision-making. Reducing risks and improving management efficiency.	High regulatory compliance costs, possible conflicts of interest, insufficient involvement of the board of directors, or a weak control structure can resul in reduced efficiency and reputational risks.	The Bank has implemented effective corporate governance mechanisms, including strategic planning, monitoring the implementation of ESG initiatives, and compliance with the principles of transparency and accountability. Committees are being set up in key areas, including AI and sustainable development.	In the future, the role of corporate governance in ensuring sustainability, digital transformation and compliance with ESG principles will increase. Increased demands from regulators and investors are expected, the need to integrate non-financial risks into the management system, as well as the development of a culture of ethical and responsible leadership.
Anti-corruption management	Prevention of money laundering and corruption, as well as measures against unfair competition.	High costs for the implementation and maintenance of internal control, monitoring and training systems. Possible reputational losses in case of violations, even if formal procedures are in place.	The Bank implements comprehensive anti-corruption measures, including internal policies, employee training, conflict of interest control, and compliance with anti-corruption legislation. Internal audit and compliance control procedures have been implemented.	In the future, regulators, investors, and ESG ratings will pay more attention to anti-corruption policies. The Bank will strengthen transparency, automate control procedures, develop a culture of zero tolerance for corruption, and integrate anti-corruption principles into the supply chain and partnerships. This will become an important element of sustainable corporate governance.
Business ethics	Spreading an informed and adequate culture of ethics and human rights among management, employees, business partners, value chain workers, and other stakeholders. Promote transparency through compliance with applicable tax regulations and strengthen the internal tax risk control system.	Potential cases of non-compliance and human rights violations within the organisation and throughout the supply chain, including suppliers.	The Bank has implemented internal business ethics policies, conducts employee training, and monitors compliance with norms and standards. Ethical principles are integrated into decision-making processes, interaction with clients and partners. Attention is paid to transparency, compliance with tax obligations and protection of human rights.	In the future, ethics will become more important as part of the ESG strategy. The Bank will strengthen control over compliance with ethical standards, expand the coverage of the supply chain, and introduce digital monitoring and reporting tools. Ethics will also play an increasing role in AI management, data protection, and engagement with vulnerable groups. Ethical sustainability will become a factor of trust and competitive advantage.
Labour practices	Strengthening of motivation and employee happiness	High standards compliance costs.	Effective labour practices.	Increasing complexity of requirements and the need for adaptation.
Contribution to social development of regions	Improving living standards and developing regions.	High costs for social programs.	Active social initiatives.	The need for constant participation in the development of the regions.
Human rights	Enhance your reputation and trust.	High standards compliance costs.	Effective measures to protect human rights.	Increasing complexity of requirements and the need for adaptation.
Interaction with stakeholders	Increase trust and cooperation.	High interaction costs.	Effective interaction with stakeholders.	The need for continuous improvement of interaction.

Topic	Positive impact	Negative impact	The impact at the moment	Future impact
Responsible financing	Contribution to sustainable development through specialised investment instruments that have a positive impact on economic, environmental, social and managerial aspects.	The absence or limited impact on the processes of sustainable development through investment instruments, which can result in negative consequences in the economic, environmental, social and managerial spheres.	Effective responsible financing measures.	Increasing complexity of requirements and the need for adaptation.
Waste management	Reducing the negative impact on the environment.	High waste management costs.	Effective waste management measures.	Strengthening the requirements for environmental responsibility.
Equal opportunities	Strengthening of motivation and employee happiness	High standards compliance costs.	Effective measures to ensure equal opportunities.	Increasing complexity of requirements and the need for adaptation.
Energy efficiency	Lower energy consumption costs.	High costs of implementing energy-efficient technologies.	Active measures to improve energy efficiency.	Strengthening energy efficiency requirements.
Responsible supply chain	Increase in resilience and trust.	High costs of control and monitoring.	Effective supply chain management measures.	Increasing complexity of requirements and the need for adaptation.
Water consumption	Reduction of water consumption costs.	High costs of implementing water-saving technologies.	Active measures to reduce water consumption.	Increased requirements for water consumption.
Biodiversity	Conservation of biodiversity and ecosystems.	High costs of biodiversity conservation.	Effective measures for the conservation of biodiversity.	Strengthening the requirements for the conservation of biodiversity.

Annex B: Index of GRI content

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
GRI 1. GRI Foundation 2021					
Statement on the use of GRI standards		About the Report		This Report has been prepared by JSC Bank CenterCredit in accordance with GRI standards and covers the period from 1 January 2024 to 31 December 2024.	
GRI Version				GRI Foundation 2021	
GRI 2. General Disclosures 2021					
The organisation and its reporting practices					
2-1	Organisational details	Approach to reporting	6, 10		
2-2	Entities included in the organisation's sustainability reporting	Approach to reporting	6, 10		
2-3	Reporting period, frequency and contact point	Approach to reporting	6, 10, 39		
2-4	Restatements of information	Approach to reporting	6, 10, 89		
2-5	External assurance	Approach to reporting	6, 10, 39		
Activities and workers					
2-6	Activities, value chain and other business relationships	5.6 Supply chain management and procurement policy	57	There were no significant changes in paragraphs 2-6 (a-c) compared to the previous reporting period.	
2-7	Employees	6. Interaction with staff 6.1 Approach to talent management	59, 60, 109		2-7 (a)
2-8	Workers who are not employees	6. Interaction with staff 6.1 Approach to talent management	59-60		
Corporate governance					
2-9	Governance structure and composition	2.1 Corporate governance system	13, 15, 17, 25, 26		2-9 (a-b)
2-10	Nomination and selection of the highest governance body	2.1 Corporate governance system	13, 15		
2-11	Chair of the highest governance body	2.1 Corporate governance system	13, 15		
2-12	Role of the highest governance body in overseeing the management of impacts	2.2 Sustainability management	13, 25, 26		2-12 (a)
2-13	Delegation of responsibility for managing impacts	2.2 Sustainability management	13, 25, 26		
2-14	The role of the supreme governing body in approving sustainability reporting	2.2 Sustainability management	13, 25, 26, 89		
2-15	Conflict of interest	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 45		
2-16	Communication of critical concerns	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 42, 45		

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
2-17	Collective knowledge of the highest governance body	2.2 Sustainability management	13, 25		
2-18	Evaluation of the performance of the highest governance body	2.1 Corporate governance system	13, 17		
2-19	Remuneration policies	2.1 Corporate governance system	13, 23		
2-20	Process to determine remuneration	2.1 Corporate governance system	13, 17, 23		
2-21	Annual total compensation ratio	2.1 Corporate governance system	13, 23		
Strategy, policies and practices					
2-22	Statement on sustainable development strategy	2.2 Sustainability management	4, 13, 25, 28		
2-23	Policy commitments	2.2 Sustainability management 4.1 Approaches to ensuring respect for human rights 4.2 Approaches to business ethics and anti-corruption issues 5. Interaction with customers and suppliers 6. Interaction with staff	13, 25, 39, 41, 45, 59		
2-24	Embedding policy commitments	2.2 Sustainability management 4.1 Approaches to ensuring respect for human rights 5. Interaction with customers and suppliers 5.6 Supply chain management and procurement policy	13, 25, 39, 45, 57		
2-25	Processes to remediate negative impacts	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 45, 51		
2-26	Mechanisms for seeking advice and raising concerns	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 45, 51		2-26 (a, i-ii)
2-27	Compliance with laws and regulations	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 42, 45		2-27 (a, i-ii)
2-28	Membership in associations	7.2 The Bank's participation in industry and government organisations and initiatives	74-75		
Stakeholder engagement					
2-29	Approach to stakeholder engagement	2.2 Sustainability management 5.1 Approach to customer interaction 5.5 Approach to interaction with suppliers 6.1 Approach to talent management 7.1 Approach to interaction with the population in the regions of presence	13, 25, 28, 45, 56, 59, 60, 74		
2-30	Collective agreements	4.2 Approaches to business ethics and anti-corruption issues	59, 60	Working conditions for employees not covered by collective agreements: Despite the fact that some of the Bank's employees are not covered by the collective agreement, the organisation provides them with a wide range of benefits and social guarantees comparable to the conditions stipulated in the collective agreements. In particular, employees have access to financial support programs, including one-time payments in difficult life situations, as well as to the services of a corporate psychologist and mental well-being programs.	2-30 (a)

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
GRI 3. Material topics 2021					
3-1	Process to determine material topics	Annex A: Identifying of material topics and impacts	89		3-1 (a (i-ii), b)
3-2	List of material topics	Annex A: Identifying of material topics and impacts	89		3-2 (a)
Economic performance					
3-3	Management of material topics	Key events for 2024 7. Responsibility to society 2.5 Risk management in the sustainable development	10, 74		
GRI 201: Economic indicators 2016					
201-1	Direct economic value generated and distributed	7. Responsibility to society	74		201-1 (a, i-iii)
201-4	Financial assistance received from government	7.2 The Bank's participation in industry and government organisations and initiatives	74	The government does not participate in the company's share capital structure.	201-4 (a, i-viii)
Anti-corruption management					
3-3	Management of material topics	4.2 Approaches to business ethics and anti-corruption issues	39		
GRI 205. Anti-Corruption Management 2016					
205-2	Communication and training about anti-corruption policies and procedures	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 45		
205-3	Confirmed incidents of corruption and actions taken	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 45	These facts have not been registered	205-3 (a)
GRI 206. Anti-competitive Behaviour					
206-1	The total number of cases of legal action in connection with obstruction of competition and violation of antimonopoly legislation	4.2 Approaches to business ethics and anti-corruption issues	39, 41, 42, 45	During the reporting period, not a single lawsuit was registered.	
Climate change					
3-3	Management of material topics	8.2 Combating climate change 8.4 Energy consumption and energy efficiency	80		
GRI 302: Energy 2016					
302-1*	Energy consumption within the organisation	8.4 Energy consumption and energy efficiency	87		
302-3	Energy intensity	8.4 Energy consumption and energy efficiency	87		
302-4	Reduction of energy consumption	8.4 Energy consumption and energy efficiency	87		
GRI 305: Emissions 2016					
305-1*	Direct greenhouse gas emissions (Scope 1)	8.2 Combating climate change	80, 81, 83		305-1 (a)
305-2*	Indirect energy greenhouse gas emissions (Scope 2)	8.2 Combating climate change	80, 81, 83		305-2 (a)

* Only own premises are included in the perimeter, as there is no access to reliable data and management control for rented premises.

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
305-3	Other indirect greenhouse gas emissions (Scope 3)	8.2 Combating climate change	80, 81, 83		
305-4	Intensity of greenhouse gas emissions	8.2 Combating climate change	80, 81, 83		
Staff training and development					
3-3	Management of material topics	6.2 Incentive system, recruitment and training of personnel	64-65		
Training and Education 2016					
404-1	Average hours of training per year per employee	6.2 Incentive system, recruitment and training of personnel 6.4 Occupational health and safety	64-65	Currently, the average hours of training per employee are not calculated for a number of types of training presented in the sustainability report, as the relevant data has not yet been collected and systematised. This issue is under development: The Bank is considering the possibility of implementing a methodology for calculating and automating data collection as part of the development of a learning management system. It is planned that in the future this will allow for more complete and quantifiable disclosure of information on all types of training.	404-1 (a, i-ii)
404-2	Professional development programs designed to support employees' ability to find employment	6.2 Incentive system, recruitment and training of personnel	64-65		
404-3	Percentage of employees receiving regular performance and career development reviews	6.2 Incentive system, recruitment and training of personnel	66		404-3 (a)
Risk management					
3-3	Management of material topics	1.3 Risk management and internal control 2.5 Risk management in the sustainable development	30		
GRI 201: Economic indicators 2016					
201-2	Financial aspects and other risks and opportunities for the organisation's activities related to climate change	2.5 Risk management in the sustainable development	32		
Workplace safety and health					
3-3	Management of material topics	6.4 Occupational health and safety	70		
GRI 403: Occupational Health and Safety 2018					
403-1	Occupational health and safety management system	6.4 Occupational health and safety	70-72		403-1 (a, i)
403-2	Hazard identification, risk assessment, and incident investigation	6.4 Occupational health and safety	70-72		
403-3	Occupational health services	6.3 Social support 6.4 Occupational health and safety	70-72		
403-4	Worker participation, consultation, and communication on occupational health and safety	6.4 Occupational health and safety	70-72		
403-5	Worker training on occupational health and safety	6.4 Occupational health and safety	70-72		403-5 (a)
403-6	Promotion of worker health	6.3 Social support	70-72		
403-8	Workers covered by an occupational health and safety management system	6.4 Occupational health and safety	70-72		

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
403-9	Work-related injuries		70-72	In accordance with the terms of contracts concluded with contractors, the responsibility for ensuring occupational health and safety, as well as for accounting and investigating occupational injuries is fully vested in contractors. Due to the fact that the Bank currently has only two employees who deal with occupational health and safety issues, it is not possible to systematically collect and analyse data on injuries among employees of contractors.	403-9 (a, i-v)
Information security					
3-3	Management of material topics	5.4 Ensuring data security	56		
GRI 418: Consumer Privacy					
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	5.4 Ensuring data security	56		418-1 (c)
Corporate governance					
3-3	Management of material topics	2.1 Corporate governance system 2.2 Sustainable development management 4.2 Approaches to business ethics and anti-corruption issues	13		
Availability of financial products and services					
3-3	Management of material topics	5.2 Customer focus, availability of financial products and quality of rendered services	52-53		
Customer satisfaction					
3-3	Management of material topics	5.2 Customer focus, availability of financial products and quality of rendered services	51-52		
Digitalisation and innovation					
3-3	Management of material topics	5.3 Digitalisation of processes to improve the quality of services	52-54		
Other disclosed elements of GRI reporting					
GRI 201: Economic indicators 2016					
201-3	The organisation's obligations related to defined benefits and pension plans	6.3 Social support	58, 68, 69	The Bank has no obligations	
GRI 203 Indirect Economic Impacts 2016					
203-1	Infrastructure investments and services supported	7. Responsibility to society 7.5 Social investments and charity	74, 77		
203-2	Significant indirect economic impacts	7. Responsibility to society 7.3 Support for small and medium-sized businesses	74-75		

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
GRI 207: Taxes 2019					
207-1	Approach to tax	7.4 Tax policy and payments	76-77		
207-2	Tax governance, control, and risk management	7.4 Tax policy and payments	76-77		
207-3	Stakeholder engagement and management of concerns related to tax	7.4 Tax policy and payments	76-77		207-1 (a, i-ii))
GRI 204: Procurement Practice 2016					
204-1	Proportion of spending on local suppliers	5 Interaction with customers and suppliers 5.5 Approach to interaction with suppliers	56		
GRI 303: Water 2018					
303-3*	Water withdrawal	8.3 Waste management and water consumption	85-86		303-3 (a, i-v)
303-4*	Water discharge	8.3 Waste management and water consumption	85-86		
303-5*	Water consumption	8.3 Waste management and water consumption	85-86		
GRI 304: Biodiversity 2016					
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	8.1 Approach to environmental responsibility management	80		
GRI 306: Waste 2022					
306-2	Management of significant waste-related impacts	8.3 Waste management and water consumption	86-87		
306-3*	Waste generated	8.3 Waste management and water consumption	86-87		
306-4*	Waste diverted from disposal	8.3 Waste management and water consumption	86-87		306-4 (a)
GRI 406: Non-discrimination 2016					
406-1	Incidents of discrimination and corrective actions taken	6.3 Social support	59, 68, 69		

* Only own premises are included in the perimeter, as there is no access to reliable data and management control for rented premises.

Indicator	Determining the GRI indicator	Report section	Page number	Comments	External assurance
GRI 401: Employment 2016					
401-1	New employee hires and employee turnover	6.2 Incentive system, recruitment and training of personnel	64, 65, 67		401-1 (a, b)
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	6.3 Social support	68, 69		401-2 (a, ii, iv, vii: financial assistance, namely birth salary)
401-3	Parental leave	6.3 Social support	68, 70		401-3 (a, b)
GRI 402: Labour/Management relations 2016					
402-1	Minimum notice periods regarding operational changes	6.1 Approach to talent management	59-60		
GRI 405: Diversity and Equal Opportunity 2016					
405-1	Diversity of governance bodies and employees	3.1 Corporate governance system 6. Interaction with staff 6.1 Approach to talent management 6.3 Social support	13, 23, 24, 60, 68, 69, 110		405-1 (a, i-ii, b, i-ii)
405-2	Ratio of basic salary and remuneration of women to men	6.2 Incentive system, recruitment and training of personnel	64, 66, 110		405-2 (a)
GRI 410: Security practices					
410-1	Security personnel trained in human rights policies or procedures	4.2 Approaches to business ethics and anti-corruption issues	39, 41		
GRI 415: Government policy					
415-1	Political contributions	7.2 The Bank's participation in industry and government organisations and initiatives	74, 75		415-1 (a)

Annex C: IFRS S1 Disclosures

Annex C: IFRS S1 Disclosures	IFRS Recommendations	Description of BCC practices	Section of the report with information
CORPORATE GOVERNANCE	Management bodies or persons responsible for overseeing risks and opportunities in sustainable development	Strategic management bodies for sustainable development: the Board of Directors; the Committee for Sustainable Development under the Board of Directors; Executive management bodies: the Management Board; the Risk Management Unit; the Operational level – the Directorate for Sustainable Development (ESG). Detailed information about the role of departments in ESG risk management, ESG Strategy, and KPI in the field of ESG is provided in the Sustainability management section	2.2 Sustainability management
	Description of the role of management in the processes of management, control and monitoring of risks and opportunities in sustainable development	The Board of Directors determines the key priorities, goals and fundamental principles of the Bank's strategic development in the area of sustainable development, as well as methods for integrating them into the overall development strategy. The Board of Directors' Committee for Sustainable Development, acting as an advisory and negotiating body to the Board of Directors, plays an important role in providing advice to the Board on issues related to the Bank's sustainable development. The roles of management are described in more detail in the Sustainability management system section. Page	2.2 Sustainability management
STRATEGY	Risks and opportunities associated with sustainable development that may affect the organisation's prospects in the short, medium, and long term	The Bank annually determines, identifies and aggregates risks for their effective management. The risk report, which includes a risk management system and information on identified relevant and irrelevant risks, is presented in the 2024 Annual Report. The risks associated with sustainable development include the following types of risks. Credit risk: climate risk (for more information, see the Bank's Risk and Opportunity Map for the Climate Agenda) Operational risk: Personnel risk: the Bank's activities are subject to personnel risk factors: - staff turnover – for more information, see the Interaction with staff section; - effectiveness of the Three-level line of defense – for more information, see the Three-level line of defense section) Information technology risk - The Bank uses various IT systems in its daily operations. System failures may result in disruption of the Bank's business processes and losses. For more information, see the Digitalisation of processes to improve the quality of services section Information security risk - The Bank uses various information assets in its daily operations that are subject to information security risk. For more information, see the Ensuring data security section Fraud risks (internal/external) - The risk of incurring losses and loss of reputation due to fraud with customer and Bank accounts. For more information, see the Approaches to business ethics and anti-corruption issues section Non-financial risks: The occurrence of losses due to improper interaction with the company, including customers, employees and suppliers, etc. For more information, see the Interaction with customers and suppliers section.	2.2 Sustainability management; 2.3 Risk management and internal control; 6.2 Incentive system, recruitment and training of personnel; 5.3 Digitalisation of processes to improve the quality of services; Ensuring data security
	Description of the current and potential impact of risks and opportunities on the business model and value chain of the organisation	Opportunities related to sustainable development: Integration of environmental and social factors into investment and credit decision-making processes (For more information, see the Client ESG risk assessment section) ESG requirements for suppliers and contractors (For more information, see the Approach to interaction with suppliers section Increasing the volume of the green portfolio and reducing the carbon footprint (For more information, see the Combating climate change section Raising awareness, training employees in ESG and sustainable development (For more information, see the ESG – Employee training section) Additional information illustrating the company's exposure to risk, taking into account the probability and magnitude associated with each risk that is assessed by risk divisions, as well as examples of significant risk actions, are presented below in annex "Focus | Risk Matrix of JSC Bank CenterCredit"	

Annex C: IFRS S1 Disclosures

Annex C: IFRS S1 Disclosures	IFRS Recommendations	Description of BCC practices	Section of the report with information
STRATEGY	The impact of risks and opportunities on an organisation's development strategy and decision-making process, including progress towards achieving goals, accounting for quantitative and qualitative information, and trade-offs between risks and opportunities considered by the organisation.	The risk report is the basis for the establishment of the Bank's significant risk management systems, as well as for taking into account all significant risks in managing the Bank's overall risk level. Based on the results of risk identification, significant types of risks are identified, the implementation of which may pose a significant threat to the Bank's financial stability and compliance with the Bank's risk appetite targets for capital adequacy. Significant risks are also identified, the implementation of which may pose a moderate threat to the financial stability of the Bank. The assessment of materiality is based on a list of key indicators, as well as the boundary values of the impact of risks and the frequency of their implementation. The materiality of risks that are not subject to quantitative assessment (non-financial risks) is assessed by filling out questionnaires by risk-owning divisions. Based on the identification results, the Bank's risk map is determined (presented in the 2024 Annual Report). For more information, see the Risk management processes section. Despite having a reliable risk management system, the Bank must be prepared for an ever-changing risk landscape driven by internal and external factors. To ensure the sustainable success of a business, it is important to identify and adapt to these risks in a timely manner. The Bank must identify and understand relevant internal and external threats that may negatively affect our profitability and growth. In the face of rapidly changing technologies and market conditions, it is important to stay one step ahead. The Bank's goal is not only to respond to changes, but also to anticipate them in order to minimise potential risks and take advantage of new opportunities. The Bank strives to create a stable and adaptive environment that will allow to function consistently in conditions of uncertainty. An example of assessing the impact of "new" risks on the bank's business model is presented below in the Focus section: Assessment of new risks of JSC Bank CenterCredit	2.3 Risk management and internal
	Qualitative and quantitative impact of risks and opportunities on the financial position, financial results and cash flow in the organisation during the reporting period; expected impact of risks and opportunities on the financial position, financial results and cash flow of the organisation in the short, medium and long term; description of the methodology for taking risks and opportunities into account in the financial planning of the organisation		
RISK MANAGEMENT	Description of processes and policies for the identification and assessment of risks in sustainable development	In 2024, the Bank updated its Risk and Capital Management Policy approved by the Board of Directors of JSC Bank CenterCredit. The policy includes key processes and mechanisms that ensure the sustainability and security of banking activities. For more information, see the Internal documents of the company in the sustainable development section	2.3 Risk management and internal
	For a description of the processes and policies for identifying and evaluating opportunities in the sustainable development	See the Risk management processes section	
	The degree to which the processes of identification, assessment, prioritisation and monitoring of risks and opportunities related to sustainable development are integrated into the overall risk management system of the company, as well as their impact on it.	Further development of the risk management system in sustainable development is planned for 2025. See the Plans for the development of the sustainability management system section	
METRICS AND GOALS	Disclosure of quantitative indicators and objectives for monitoring and managing risks and opportunities in the sustainable development	The Bank uses GRI standards to disclose non-financial information. The information disclosure index is set out in Annex B.	Annex B

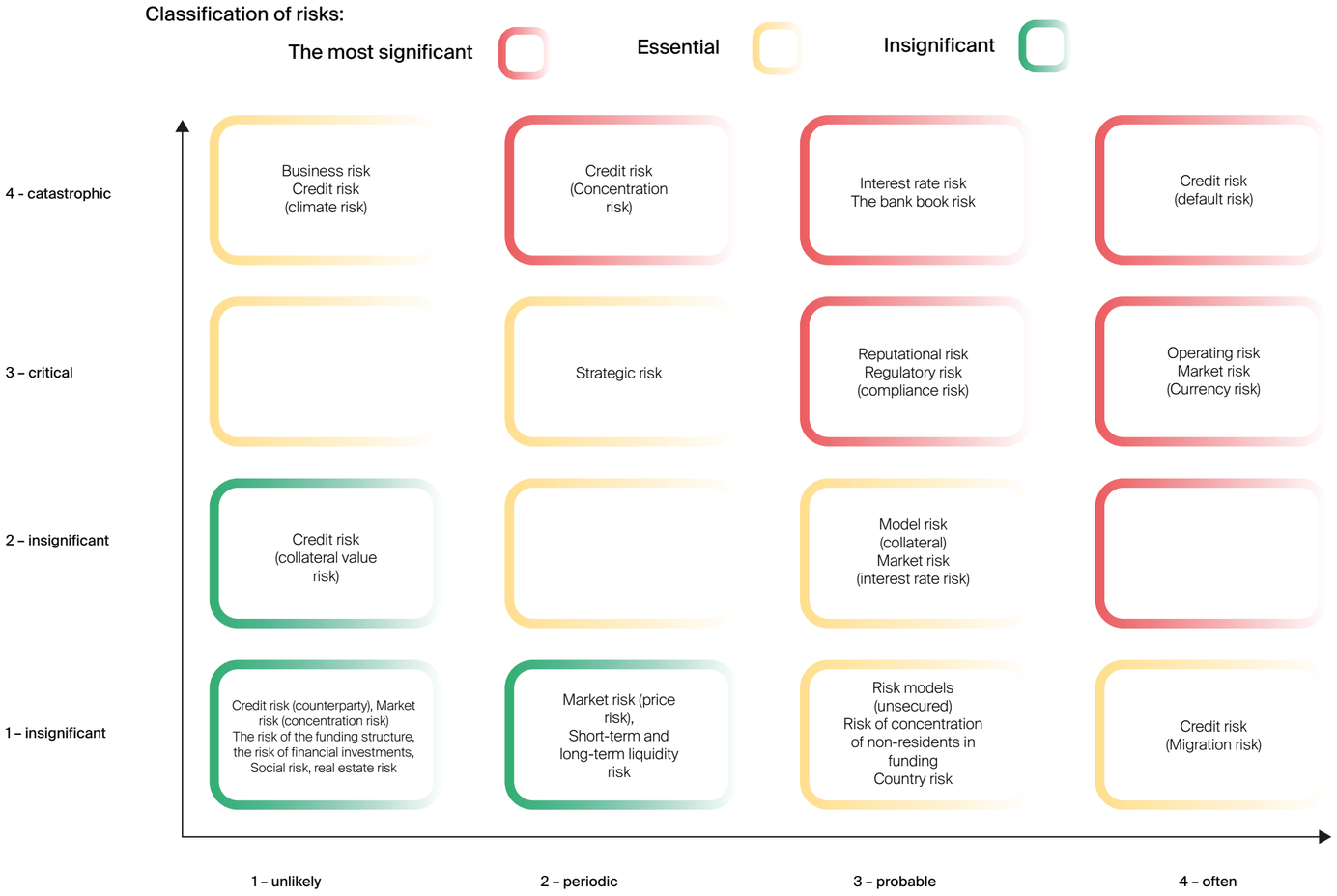
Focus: Risk matrix of JSC Bank CenterCredit

The Bank annually determines, identifies and aggregates risks for their effective management. The results of identification and determining of relevant and irrelevant risks can be found in the Annual Report in the Risk report section.

For each identified risk, the Bank determines the level of risk in two aspects:

- The internal risk profile is determined by considering the risk components inherent in the nature of a particular activity, without taking into account the availability and effectiveness of existing risk management measures.
- Residual risk profile: determined by considering the level of intensity of risk management measures.

Below is the matrix of JSC Bank CenterCredit, illustrating the company's exposure to risk, taking into account the probability and magnitude associated with each risk, which is assessed by risk divisions.



Examples of mitigation actions to mitigate significant risks.

Type of risk	Mitigation measures
Reputational risk	As part of its Reputational Risk Management Policy of JSC Bank CenterCredit (the "Policy"), as well as the Regulations for Determining the Level of Reputational Risk of JSC Bank CenterCredit (internal regulatory documents), the Bank has a clear algorithm for dealing with reputational risks: 1. There are instructions and memos for employees and ambassadors whose actions may result in reputational risks, reflecting recommendations and precautionary measures. 2. A process of interaction with the Bank's structural divisions has been established for timely response to cases involving reputational risk in case of violation of established parameter limits and provision of information. 3. On a quarterly basis, the Bank measures the level of reputational risk using the point-weight method. 4. An email address has been created for emergency notifications in case of a situation where the actions of employees damage the bank's reputation: reputation.risk@bcc.kz. The main mechanisms (activities/initiatives) of reputational risk management system implemented by the Bank on a regular or one-time basis aimed at reducing reputational risk are set out below: 1. the existence of an organisational structure for the management of reputational risks, the definition of functions and powers within the organisational structure; 2. the formation of an internal regulatory and methodological framework for all areas of activity within the framework of the internal regulatory documents; 3. availability of a data collection and storage system for the formation of regulatory reporting; 4. conducting regular training of the units involved, including taking into account their functions and areas of activity.
Currency risk	In accordance with internal documents on currency risk management, the Bank takes the following steps to mitigate currency risk: 1. asset and liability management through balancing in order to minimise fluctuations in the net value of the portfolio; 2. hedging through the conclusion of a balanced transaction (transferring the risk of price changes from one person to another), conducting off-balance sheet transactions with derivative financial instruments; 3. capital provisioning; 4. avoiding or rejecting a risk-related operation.

Focus: Assessment of new risks of JSC Bank CenterCredit

	1. The risks associated with AI	2. Regulatory risks related to climate change.
Risks	As part of our development strategy, the Bank is actively implementing Artificial Intelligence (AI) technologies at various levels, from traditional solutions to generative models. We see AI as a powerful tool for ensuring long-term sustainable development, capable of significantly reducing fraud and credit risks, ensuring timely 360° data analysis, and improving the quality of service to our customers. However, the introduction of AI brings new challenges that require special attention. We are aware of the potential risks associated with the consequences of using AI technologies and are taking measures to effectively manage them: Bias Risks: We understand that AI models may unknowingly reinforce existing biases contained in the data they are trained on. This may result in discriminatory decisions in the processes of lending or providing other banking services. To prevent this, we implement strict data quality control procedures and mechanisms for checking models for bias, minimising legal and reputational risks, as well as maintaining the trust of our customers. Explainability Risks: We recognise that the complexity of some AI models, especially the so-called "black boxes" (for example, deep learning models), can make it difficult to understand the logic of their solutions. This creates difficulties for conducting audits, ensuring compliance with regulatory requirements, and providing clear explanations to our clients. To solve this problem, we prefer models with more transparency and use methods to explain AI solutions. Inefficiency and Cost Overrun Risks: We are aware that inefficient implementation of AI, incorrect choice of technologies or insufficient project management may result in cost overruns and failure to achieve the expected results. Therefore, we pay special attention to careful planning, selection of optimal technologies and professional management of AI implementation projects in order to maximise the return on investment and avoid unnecessary costs.	1. Climate change is increasingly seen as a systemic risk that has a direct impact on the financial sustainability of organisations. The growing attention from regulators, international obligations, and the public is shaping a new regulatory vector aimed at integrating climate and environmental risks into corporate governance and risk management processes. In 2016, the Republic of Kazakhstan ratified the Paris Agreement, committing itself to reducing greenhouse gas emissions and achieving carbon neutrality by 2060. This means a gradual tightening of national regulation in terms of climate standards, carbon accounting and taxation of emissions, as well as the possible introduction of carbon offset and carbon tax mechanisms. 2. The Agency for Regulation and Development of the Financial Market (ARDFM) has issued Recommendations on the identification of Environmental and Social (E&S) risks, urging banks to take these risks into account when evaluating projects and corporate borrowers. In the Resolution of the Board of the National Bank of the Republic of Kazakhstan No. 188, within the framework of the requirements for the risk management system (RMS), environmental and social risks were officially recognised as subject to identification, monitoring and management. Bank CenterCredit is the only bank in the region that has developed and approved a Climate Strategy. Thus, climate change and related regulation form a new type of risk for BCC — regulatory climate risk, which may affect both customer sustainability and capital requirements, internal risk assessment processes and information disclosure.
Impact on business	The impact of the risks associated with the use of artificial intelligence (AI) on the bank's business can be significant and multifaceted, affecting various aspects of its activities. These are the main areas of impact: Increased operating expenses: Implementing and maintaining measures to minimise bias, ensure transparency, and effectively manage AI projects requires additional investments in technology, personnel, and training. AI system failures: Technical failures, cyber attacks, or data errors may cause AI systems used for mission-critical operations such as fraud detection or risk management to malfunction.	The possible mandatory integration of climate and social risks into credit processes (NBRK Regulation No. 188, recommendations of the ARDFM) and the uncertainty of regulation of carbon offsets may require adaptation of PD/LGD assessment models and the introduction of new analytical approaches. Additionally, the introduction of carbon taxes, transitional obligations, and decarbonisation requirements increases the financial burden on borrowers, especially in carbon-intensive industries, which increases the risk of their insolvency, and carbon-intensive and environmentally sensitive assets may lose liquidity due to changes in value due to regulatory changes, which increases potential foreclosure losses and may negatively affect LGD.
Measu-rements	Key findings for risk management: AI governance at the Bank covers four categories of risk — ethical, technical, operational, and regulatory. This includes measures such as data validation, explainable AI, A/B testing, architectural design, user training, and legal audits for compliance with regulatory requirements. **AI policy:** In Q3 2025, the Bank plans to develop and implement a clear AI policy outlining ethical principles, risk management procedures, data usage rules, transparency requirements, and accountability. Also in Q3 2025, an AI Committee will be established to ensure centralised oversight and adherence to the principles of legality, transparency, fairness, controllability, and the protection of human rights.**Data management:** Implementation of strict data management procedures, including data quality control, data anonymisation and de-identification methods, and data subject rights enforcement processes. **Training and professional development:** Regular training of employees involved in the development, implementation and use of AI to increase their awareness of risks and best practices.	Climate and regulatory risk management Recognising the strategic importance of climate change and related regulatory initiatives (including the Paris Agreement, NBRK Regulation No. 188, and the recommendations of the ARDFM), Bank CenterCredit has developed a Climate Strategy and consistently implements measures to integrate climate factors into business processes. Since 2024, the Bank has been implementing climate stress testing, covering both top-down and bottom-up approaches, with an emphasis on transition risks and industry decarbonisation trajectories. Starting in 2023, the Bank applies responsible financing tools, which makes it possible to identify and take into account the environmental and social risks of borrowers, increasing the stability of the loan portfolio. In addition, the Bank is actively expanding its portfolio of green loans that comply with the principles of taxonomy and international standards of sustainable financing.

Annex D: IFRS S2 Disclosures

Unit	IFRS Recommendations	Description of BCC practices	Section of the report with information
CORPORATE GOVERNANCE	Management bodies or persons responsible for overseeing climate risks and opportunities.	The Board of Directors approved the bank's long-term Climate Strategy in 2024. Issues related to climate change are considered at meetings of the Committee for Sustainable Development at least once a year. The procedure for informing the Board of Directors and its Committees on climate risk and opportunity management issues consists in the annual preparation of materials for the Committees under the Board of Directorson the current status of implementation of activities under the ESG roadmap, as well as the status of implementation of the Climate Strategy. The Bank's corporate long-term development strategy takes into account the objectives of the Climate Strategy.	2.2 Sustainability management
	The role of Management in assessing and managing climate-related risks and opportunities	**Climate issues are the responsibility of the following top management representatives:** Member of the Board of Directors, Independent Director, First Vice President, Member of the Management Board, Vice President for Risk Management, Head of the Directorate (CSO). Top management representatives responsible for managing climate aspects are accountable to the Financial and Risk Management Committee and the Committee for Sustainable Development. In the reporting period, the Directorate for Sustainable Development, together with the Bank's relevant structural divisions, monitored, analysed and consolidated data in order to develop the Bank's Climate Strategy.	2.2 Sustainability management
STRATEGY	A description of the climate-related risks and opportunities that the Company has identified in the short, medium and long term. The current and expected impacts of these climate risks and opportunities on the organisation's business model and value chain.	The Bank's climate strategy determines that in the course of its activities, the Bank evaluates two types of climate risks from the point of view of the loan portfolio: physical risk associated with natural phenomena resulting from climate change transitional risk associated with the transition to a low-carbon economy On a short-term horizon, implying the current period, using the ESG scoring tool for borrowers On a long-term horizon to 2030 and 2050 through climate stress testing To determine the potential impact of climate risks on financial stability and sustainability, the Bank conducted an industry analysis, assessing the inherent exposure of large business companies to climate-related physical and transitional risks. The analysis of the impact of significant climate risks and adaptation plans are defined in the bank's climate strategy. The list of such risks is presented in the Bank's risk and opportunity map within the framework of the climate agenda section of the Report.	2.2 Sustainability management
	The current and expected impacts of these climate risks and opportunities on the organisation's business model and value chain.		8.2 Combating climate change
	The impact of climate risks and opportunities on an organisation's strategy and decision-making process, including information on its climate transition plan	In 2024, the Bank conducted 2 types of stress testing to determine the Bank's exposure to climate risks. Climate stress testing made it possible to assess the potential risks and impact of climate change on the Bank's loan portfolio. The test results highlight the need to actively manage climate risks and develop strategies to minimise their impact. Detailed information on the results of stress testing is set out in the Climate stress testing section	8.2 Combating climate change
	The sustainability of the organisation's strategy and business model to climate change, events and uncertainties, taking into account the identified climate risks and opportunities of the organisation.		

Annex D: IFRS S2 Disclosures

Unit	IFRS Recommendations	Description of BCC practices	Section of the report with information
RISK MANAGEMENT	Description of climate risk identification and assessment processes	The aspects of risk management are closely linked to the Bank's sustainable development strategy and climate strategy and are set out in the Bank's internal regulatory documents, which were developed and approved by the corporate governance bodies in 2023, some of which were updated in 2024. The climate risk management system is integrated into the corporate risk management system, in particular, accounting and assessment of climate risks are carried out by various divisions of the Bank on a regular basis. The Bank uses specialised tools and procedures to assess ESG risks, including risks related to climate impacts: Exclusion list: checking corporate clients for compliance of their activities and practices with the list of unacceptable activities; Self-declaration: filling out a questionnaire addressed primarily to clients of the SME segment and aimed at determining the level of ESG risk depending on the industry and applicable practices; Determination of the inherent ESG assessment by industry: assessment of the exposure to climate risks / significance of the factors of sustainable development of the main branches of the Bank's corporate clients' operations (based on available quantitative data), followed by the application of the results as part of the ESG scoring procedure; ESG scoring: a differentiated assessment of the exposure of corporate clients (usually clients of the large business segment and the largest clients of the SME segment) to climate risks and the importance of sustainable development factors in their activities, taking into account their minimisation and adaptation initiatives and based on verifiable data and information; Assessment for taxonomy compliance: verification of compliance of medium and large loans (taking into account the threshold of materiality) for compliance with the criteria of "green" and/or social taxonomy; ESG project assessment: verification of the positive environmental or social effects of a project, which can also have a positive impact on the results of ESG scoring of corporate clients. In 2024, it is planned to update responsible financing instruments in accordance with the new regulations of the ARDFM and the NBRK in the area of environmental and social risk management.	2.2 Sustainability management
	Description of climate risk management processes		
	Integration description Description of the processes of identification, assessment and management of climate risks in the overall risk management system		
METRICS AND GOALS	Description of the indicators used by the organisation to assess climate-related risks and opportunities in accordance with its risk management strategy and processes	The Bank's climate strategy defines the goals for the growth of the Bank's green portfolio, the Bank's goals for reducing its own negative climate impact, the volume and targets for funded emissions, and a plan to withdraw financing from coal industry clients. The decarbonisation efforts and objectives presented in the strategy focus on funded emissions (Scope 3, portfolio emissions) as well as the Bank's own operations (Scopes 1, 2 and 3, non-portfolio emissions). The science based targets initiative (SBTi), a sector-based approach that takes into account the specifics of economic sectors and their potential to reduce emissions, was chosen as the methodology for setting goals.	8.2 Combating climate change
	Disclosure of information on greenhouse gas emissions in categories 1, 2 and 3 and specific indicators	Information on emissions by Scopes 1, 2, 3 is set out in the Waste management and water consumption section of the Report. The methodology for calculating greenhouse gas emissions is fully consistent with the requirements and recommendations of the GHG Protocol and PCAF for financial institutions.	8.2 Combating climate change
	Description of the objectives used by the organisation to manage climate-related risks and opportunities and the effectiveness of achieving the targets	The Climate Strategy defines the goals until 2030 for increasing the portfolio of "green" financing: achieving the target value of 400 billion tenge by 2030. The Bank has also set interim and long-term goals for reducing the carbon footprint of the bank's own operations and the funded corporate loan portfolio. By 2030, it is planned to reduce greenhouse gas emissions on Scopes 1, 2, 3 (non-portfolio) by 42% compared to 2023. For funded emissions, targets have been set to reduce emissions by 42% in key industries.	8.2 Combating climate change

Annex E: SASB Industry Indicators

Indicator	Report section
FN-CB-230a.1 (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	5.4 Ensuring data security
FN-CB-230a.2 Description of approach to identifying and addressing data security risks	5.4 Ensuring data security
FN-CB-410a.2 Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	2.5 Risk management in the sustainable development
FN-CB-410b.2 Gross exposure for each industry by asset class	Databook
FN-CB-410b.3 Percentage of gross exposure included in the financed emissions	Databook
FN-CB-410b.4 Description of methodology used to calculate financed emissions	8.2 Combating climate change
FN-CB-510a.1 Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	4.2Approaches to business ethics and anti-corruption issues
FN-CB-510a.2 Description of whistleblower policies and procedures	4.2Approaches to business ethics and anti-corruption issues
FN-CF-220a.2 Total amount of monetary losses as a result of legal proceedings associated with customer privacy	5.4 Ensuring data security

Annex F: Supplementary information

Employees

GRI 2-7

		2022	2023	2024
Number of full-time employees		7,570	7,960	7,658
	Men	**2,462**	**2,760**	**2,565**
	Women	**5,108**	**5,200**	**5,093**
Head office		3,797	4,282	3,995
	Men	1,699	1,983	1,751
	Women	2,098	2,299	2,245
Southern region		1,502	1,503	1,524
	Men	340	372	408
	Women	**1,162**	**1,131**	**1,116**
Central region		287	272	274
	Men	64	57	53
	Women	**223**	**215**	**221**
Northern region		**944**	**922**	**928**
	Men	**182**	**184**	**195**
	Women	**762**	**738**	**733**
Western region		**683**	**648**	**628**
	Men	**113**	**108**	**103**
	Women	**570**	**540**	**525**
Eastern region		**357**	**333**	**309**
	Men	**64**	**56**	**56**
	Women	**293**	**277**	**253**

		2022	2023	2024
Number of part-time employees		13	23	34
	Men	**8**	**20**	**25**
	Women	**5**	**3**	**9**
Head office		5	15	26
	Men	5	14	21
	Women	0	1	5
Southern region		3	3	3
	Men	0	1	1
	Women	**3**	**2**	2
Central region		1	1	2
	Men	1	1	1
	Women	**0**	**0**	1
Northern region		**4**	**3**	3
	Men	**2**	**3**	2
	Women	**2**	**0**	1
Western region		**0**	**1**	0
	Men	**0**	**1**	0
	Women	**0**	**0**	0
Eastern region		**0**	**0**	0
	Men	**0**	**0**	0
	Women	**0**	**0**	0

Socio-cultural diversity of management personnel and employees in 2024

GRI 405-1

	Under 30	30-50	Over 50	Total employees
Direction of the Bank[26]				
Total	-	11	6	17
including women	-	3	1	4
including men	-	8	5	13
Including the Board of Directors				
Total	-	1	5	6
including women	-	-	-	-
including men	-	1	5	6
Including the Management Board of the Bank				
Total	-	4	-	4
including women	-	1	-	1
including men	-	3	-	3
Including Vice Presidents				
Total	-	6	1	7
including women	-	2	1	3
including men	-	4	-	4
Leadership				
Total	-	70	20	90
including women	-	35	16	51
including men	-	34	4	38
Line managers				
Total	63	609	50	723
including women	25	327	30	382
including men	38	283	20	341
Employees				
Total	2,912	3,581	372	6,865
including women	1,769	2,621	275	4,665
including men	1,143	960	97	2,200
Total personnel (estimated number at the end of the year)				
Total	2,975	4,272	446	7,694
including women	1,794	2,986	322	5,102
including men	1,181	1,286	124	2,592

The ratio of the base salary of women to men for 2022-2024, %

GRI 405-2

Indicator boundaries	2022			2023			2024		
	Head Office	Branch network	Total	Head Office	Branch network	Total	Head Office	Branch network	Total
Average salary	0.68	0.92	0.61	0.69	0.89	0.62	0.72	0.85	0.65
Direction of the Bank	-	-	-	0.77	-	0.77	0.71		0.71
Leadership	0.70	0.74	0.50	0.86	0.67	0.62	0.97	0.73	0.85
Line managers	0.78	1.06	0.70	0.74	1.05	0.70	0.8	0.97	0.76
Employees	0.71	0.89	0.62	0.67	0.88	0.60	0.77	0.86	0.68

The ratio of total remuneration of women to men for 2022-2024, %

GRI 405-2

Indicator boundaries	2022			2023			2024		
	Head Office	Branch network	Total	Head Office	Branch network	Total	Head Office	Branch network	Total
Average remuneration	0.68	0.92	0.61	0.69	0.89	0.62	0.72	0.85	0.65
Direction of the Bank	-	-	-	0.87	-	0.87	0.82	-	0.82
Leadership	0.66	0.69	0.47	0.92	0.66	0.69	1.02	0.86	0.93
Line managers	0.82	1.23	0.75	0.77	1.20	0.76	0.78	1.03	0.75
Employees	0.71	0.90	0.64	0.70	0.87	0.63	0.75	0.88	0.69

Number of courses and hours completed by the Bank's employees in 2023

GRI 404-1

Distance learning	Total employees	Hours of training per employee	Total hours of training
Total	**7,983**	**1.7**	**13,925**
Disaggregated by gender			
Men	2,780	1.8	4,941
Women	5,203	1.7	8,984
Disaggregated by categories			
Leadership	770	2.5	1,925
Professional employees	7,213	1.7	12,000

[26] Taking into account independent directors

External training	Total employees	Hours of training per employee	Total hours of training
Total	**804**	**26.9**	**21,628**
Disaggregated by gender			
Men	436	25.1	10,962
Women	368	29.3	10,666
Disaggregated by categories			
Leadership	332	20.8	6,906
Professional employees	472	31.2	14,722

Number of courses and hours completed by the Bank's employees in 2024

GRI 404-1

Distance learning	Total employees (including all appointments and dismissals)	Hours of training per employee	Total hours of training
Total	**7,692**	**2.0**	**15,256**
Disaggregated by gender			
Men	2,590	2.2	5,585
Women	5,102	1.9	9,671
Disaggregated by categories			
Leadership	827	2.4	1,973
Professional employees	6,865	1.9	13,283

External training	Total employees	Hours of training per employee	Total hours of training
Total	**1,436**	**23.0**	**33,061**
Disaggregated by gender			
Men	638	25.6	16,316
Women	798	21.0	16,745
Disaggregated by categories			
Leadership	695	16.0	11,154
Professional employees	741	29.6	21,907

Annex G: Independent Auditor's report

«КПМГ Такс энд Эдвайзори»
жауапкершілігі
шектеулі серіктестік
Қазақстан, A25D6T5, Алматы,
Достық д-лы, 180,
+7 (727) 298-08-98

KPMG Tax and Advisory LLC
180 Dostyk Avenue, Almaty,
A25D6T5, Kazakhstan

Independent Practitioners' Limited Assurance Report

To the Board of Directors of Bank CenterCredit JSC

Report on the Subject Matter Information disclosed in the Sustainability Report of Bank CenterCredit JSC for 2024

Conclusion

We have performed a limited assurance engagement on whether the subject matter information detailed below ("Subject Matter Information", "SMI") of the Bank CenterCredit JSC for the year ended 31 December 2024 has been prepared in accordance with the Applicable criteria.

Based on the procedures performed and evidence obtained, nothing has come to our attention to cause us to believe that the subject matter information of the Bank CenterCredit JSC for the year ended 31 December 2024 is not prepared, in all material respects, in accordance with the Applicable criteria.

Subject Matter

The Subject Matter for our limited assurance engagement were the selected quantitative and qualitative indicators ("Indicators") as detailed in Appendix A of this report, as detailed in Bank CenterCredit's Sustainability Report for the year ended 31 December 2024 ("Report"), as prepared and presented by management of the Bank.

The indicators are aggregated based on the reporting boundaries developed by the Bank which are detailed in Appendix A of this report.

Applicable criteria

The Applicable Criteria for this limited assurance engagement were the requirements of established frameworks, applicable to the SMI, the details of which are mentioned in Appendix A of this report.

Basis for conclusion

We conducted our engagement in accordance with *International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other Than Audits or Reviews of Historical Financial Information, and International Standard on Assurance Engagements (ISAE) 3410, Assurance Engagements on Greenhouse Gas Statements*, issued by the International Auditing and Assurance Standards Board (IAASB). Our responsibilities under those standards are further described in the "Our responsibilities" section of our report.

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We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).

Our firm applies International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Restriction of use of our report

Our report is intended solely for the use of Board of Directors of the Bank in connection with the SMI and is not intended to be and should not be used by any other party. It will be released to Board of Directors of the Bank on the basis that our report shall not be copied, referred to or disclosed, in whole (save for the Bank's own internal purposes) or in part, without our prior written consent.

Our report is designed to meet the agreed requirement of Board of Directors of the Bank determined by Board of Directors of the Bank needs at the time. Our report should not, therefore, be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than the Board of Directors of the Bank, for any purpose or in any other context. Any party other than the Board of Directors of the Bank who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk. To the fullest extent permitted by law, we accept or assume no responsibility and deny any liability to any party other than the Board of Directors of the Bank for our work, for this independent limited assurance report, or for the conclusions we have reached.

Our conclusion is not modified in respect of this matter.

Use of assurance report on a website

We have consented to the publication of our report on Bank CenterCredit's website at https://www.bcc.kz/about/esg/ for the purpose of Bank CenterCredit showing that it has obtained an independent limited assurance report in connection with the SMI.

Responsibilities for the Subject Matter Information

Management is responsible for:

- designing, implementing and maintaining internal control relevant to the preparation of the SMI such that it is free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the SMI and appropriately referring to or describing the criteria used;
- preparing, fairly stating and properly calculating the SMI in accordance with the Applicable criteria;
- preventing and detecting fraud;
- selecting the content of the SMI, including identifying and engaging with intended users to understand their information needs;
- supervision of other staff involved in the preparation of the SMI.

Annex G: Independent Auditor's report

Inherent limitations

Due to the inherent limitations of any internal control structure, it is possible that errors or irregularities in the information presented in the SMI may occur and not be detected. Our engagement is not designed to detect all weaknesses in the internal controls over the preparation of the SMI as the procedures performed were undertaken on a test basis.

Our engagement was not designed to test, verify or audit the completeness and accuracy of system outputs from the Bank.

Furthermore, for the purpose of this limited assurance engagement, we have not performed any procedures around:

- Checking the disclosure of indicators in reference to any framework or guidance other than what is entailed in the Applicable Criteria, such as for example, the Sustainability Accounting Standards Board (SASB) standards;
- Checking the accuracy of the GRI content indexation, as featured in the Report;
- Assessing compliance of any other indicators or related information, either qualitative or quantitative, which is not part of the SMI for this engagement, as featuring in the Report with the disclosure requirements of any applicable internal and external standards;
- Assessing the accuracy, completeness and reasonableness of the reporting boundaries determined by the management for the purposes of the Report;
- Auditing or verifying the underlying records or other sources from which the SMI was extracted;
- Checking the requirements of GRI Standard 1 "Foundation 2021", for the wider Report, when checking the requirements of the Report, as applicable to the SMI, being prepared "in accordance or in reference with GRI";
- Ensuring completeness and accuracy of baseline figures that are reported in the Report, where applicable;
- Testing the effectiveness of and detecting any weaknesses in the internal controls over the preparation of the SMI as the procedures performed were undertaken on a test basis;
- Testing, verifying or auditing the completeness and accuracy of system outputs and other data collection systems used for compilation of the SMI; and
- Assessing the accuracy, completeness and reasonableness of determining and reporting disclosures from the GRI Topic Standards for each material topic.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the SMI are free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the Board of Directors.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the SMI that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the SMI and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, the procedures we performed primarily consisted of:

- Inquiries of Management to gain an understanding of the Bank's processes relevant to the preparation of the SMI, and provide a basis for designing and performing procedures to respond to addressed risks and to obtain limited assurance to support a conclusion.
- Inquiries of Management to obtain an understanding of internal controls relevant to the SMI, the quantification process and data used in preparing the SMI, the methodology for gathering qualitative information, and the process for preparing and reporting the SMI. We did not evaluate the design of particular internal control activities, obtain evidence about their implementation or test their operating effectiveness.
- Interviews with staff responsible for providing the information in the Report.
- Performed analytical review procedures to understand the underlying subject matter and identify areas where a material misstatement of the SMI is likely to arise.
- Performed procedures over the SMI, including the recalculation of the indicators using relevant formulas to verify the accuracy and consistency with the supporting data.
- Comparing the SMI to corresponding information in the relevant underlying sources to evaluate the accuracy of the information and confirm whether all the relevant information contained in such underlying sources has been included in the Report.
- Reading the information presented in the Report to confirm whether it is in line with our overall knowledge of, and experience with, the sustainability performance of the Bank.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

KPMG Tax and Advisory LLC

KPMG Tax and Advisory LLC

Almaty, Republic of Kazakhstan

24 June 2025

Annex G: Independent Auditor's report

Appendix A

The reporting boundary for the SMI indicated below comprises only the operations of the Bank.

#	Indicator	Relevant standard	Relevant section of standard which will be referred to as the Applicable Criteria
1	Role of the highest governance body	GRI Standard	Requirement of (a) of Disclosure 2-12 "Role of the highest governance body in overseeing the management of impacts" of GRI 2: General Disclosures 2021
2	Governance structure and composition	GRI Standard	Requirements of (a) and (b) of Disclosure 2-9 "Governance structure and composition" of GRI 2: General Disclosures 2021
3	Compliance with laws and regulations	GRI Standard	Requirement of (a) (i) and (ii) of Disclosure 2-27 "Compliance with laws and regulations" of GRI 2: General Disclosures 2021
4	Diversity of governance bodies and employees	GRI Standard	Requirements of (a) (i) (ii) and (b) (i) and (ii) of Disclosure 405-1 "Diversity of governance bodies and employees" of GRI 405: Diversity and Equal Opportunity 2016
5	Mechanisms for seeking advice and raising concerns	GRI Standard	Requirement of (a) of Disclosure 2-26 "Mechanisms for seeking advice and raising concerns" of GRI 2: General Disclosures 2021
6	Collective bargaining agreements	GRI Standard	Requirement of (a) of Disclosure 2-30 "Collective bargaining agreements" of GRI 2: General Disclosures 2021
7	Process to determine material topics	GRI Standard	Requirements of (a) and (b) of 3-1 "Process to determine material topics" of GRI 3: Material Topics 2021
8	List of material topics	GRI Standard	Requirement of (a) of 3-2 "List of material topics" GRI 3: Material Topics 2021
9	Waste diverted from disposal	GRI Standard	Requirement of (a) of 306-4 "Waste diverted from disposal" of GRI Standard 306: Waste 2020
10	Financial assistance received from government	GRI Standard	Requirement of (a) (i-viii) of 201-4 "Financial assistance received from Government" of GRI Standard 201: Economic Performance 2016
11	Direct economic value generated and distributed	GRI Standard	Requirement of (a) (i), (ii) and (iii) of 201-1 "Direct economic value generated and distributed" of GRI Standard 201: Economic Performance 2016
12	Approach to tax	GRI Standard	Requirement (a) (i) and (ii) of 207-1 "Approach to tax" of GRI 207: Tax 2019
13	Employees	GRI Standard	Requirement of (a) of 2-7 "Employees" of GRI 2: General Disclosures 2021
14	Ratio of basic salary and remuneration of women to men	GRI Standard	Requirement of (a) of 405-2 "Ratio of basic salary and remuneration of women to men" of GRI 405: Diversity and Equal Opportunity 2016
15	Parental leave	GRI Standard	Requirement of (a) and (b) of 401-3 "Parental leave" of GRI 401: Employment 2016
16	Benefits provided to full-time employees that are not provided to temporary or part-time employees	GRI Standard	Requirement of (a) (ii), (iv) and (vi) of 401-2 "Benefits provided to full-time employees that are not provided to temporary or part-time employees" of GRI 401: Employment 2016
17	Occupational health and safety management system	GRI Standard	Requirement of (a) (i) of 403-1 "Occupational health and safety management system" of GRI 403: Occupational Health and Safety 2018
18	Worker training on occupational health and safety	GRI Standard	Requirement of 403-5 "Worker training on occupational health and safety" of GRI 403: Occupational Health and Safety 2018
19	Work-related injuries	GRI Standard	Requirement of (a) (i-v) of 403-9 "Work-related injuries" of GRI 403: Occupational Health and Safety 2018
20	New employee hires and employee turnover	GRI Standard	Requirement of 401-1 "New employee hires and employee turnover" of GRI 401: Employment 2016
21	Water withdrawal	GRI Standard	Requirement of (a) of 303-3 "Water withdrawal", excluding rented areas of GRI 303: Water and Effluents 2018
22	Percentage of employees receiving regular performance and career development reviews	GRI Standard	Requirement of 404-3 "Percentage of employees receiving regular performance and career development reviews" of GRI 404: Training and Education 2016
23	Average hours of training per year per employee	GRI Standard	Requirement of 404-1 "Average hours of training per year per employee" of GRI 404: Training and Education 2016
24	Confirmed incidents of corruption and actions taken	GRI Standard	Requirement of (a) of 205-3 "Confirmed incidents of corruption and actions taken" GRI 205: Anti-corruption 2016
25	Direct (Scope 1) GHG emissions	GRI Standard	Requirement of (a) of 305-1 "Direct (Scope 1) GHG emissions", excluding rented areas of GRI 305: Emissions 2016
26	Energy indirect (Scope 2) GHG emissions	GRI Standard	Requirement of (a) of 305-2 "Energy indirect (Scope 2) GHG emissions", excluding rented areas of GRI 305: Emissions 2016
27	Political contributions	GRI Standard	Requirement of (a) of GRI 415-1 "Political contributions" of GRI 415: Public Policy 2016
28	Substantiated complaints concerning breaches of customer privacy and losses of customer data	GRI Standard	Requirement of (c) of 418-1 "Substantiated complaints concerning breaches of customer privacy and losses of customer data" of GRI 418: Customer Privacy 2016

Bank CenterCredit JSC

Annex H: Glossary of Terms

Term	Description
ISAE3000	The standard for confirming non-financial information. ISAE 3000 is issued by the International Auditing and Assurance Standards Board (IAASB). The standard consists of guidelines for ethical conduct, quality management, and performance of the ISAE 3000 assignment
ISO 14001	An international standard containing requirements for an environmental management system
AntiFraud	A general term for systems, procedures and measures aimed at preventing, detecting and responding to fraud
ESG-scoring	Assessment of companies based on environmental, social and managerial factors that may affect their financial stability and investment attractiveness
Exclusion list	An exclusion list that includes companies or industries that are excluded from investment portfolios or loan programs due to non-compliance with certain criteria, such as environmental or social standards
GEFF (Green Economy Financing Facility)	Green Economy Financing Program from the European Bank for Reconstruction and Development (EBRD)
ModelOps	The practice of managing the lifecycle of machine learning models, similar to DevOps for software development
Moody`s	An international rating agency that provides credit ratings, research and risk analysis for financial instruments and liabilities
ODEPT	Trading platform
Open API	An open application programming interface that allows developers to create applications that can interact with other services or platforms
Price-list	A list of goods or services with prices
Push-notifications	Messages that the app can send to users on their devices, even when the app is not active
S&P Global Rating	An international rating agency that provides credit ratings, research and risk analysis
Super-app	A mobile application that includes many functions and services, allowing users to perform various tasks in one application
Underwriting	The process of risk assessment and determining the terms of insurance or credi
Anti-phishing	Measures and technologies aimed at preventing fraudulent attempts to obtain confidential information
Authentication	The process of verifying the identity of a user or device in the system
Balance sheet property	The company's assets, which are reflected in the balance sheet and may include both tangible and intangible assets
Big Four	The collective name of the four largest auditing firms in the world: Deloitte, PricewaterhouseCoopers (PwC), Ernst & Young (EY) and KPMG
Biometrics	Using a person's unique physiological or behavioural characteristics to identify or verify a person
Gamification	Applying game design elements and mechanics in non-game contexts to increase engagement and motivation
UN Global Compact	A United Nations initiative aimed at encouraging companies to take a socially responsible approach to business and ensure transparency in reporting on such activities. The UN Global Compact sets out ten fundamental principles related to human rights, labour standards, environmental protection and anti-corruption
Grade	Grouping of positions on certain grounds in order to build a motivation system
Climate stress testing	Climate stress testing Analysis of financial institutions' resilience to climate change risks
Compliance	Compliance with legal and regulatory requirements, as well as internal rules and standards of the company
Return on capital (ROE)	A financial indicator that measures a company's ability to generate returns on shareholder investments
Cashback	Refund of part of the purchase amount to the buyer's account when using certain payment instruments
Liquidity	The ability of an asset to be quickly sold at a market price without significant losses
"Green" economy	Individuals and legal entities related to the company's activities, capable of influencing its results or being influenced by the company on their activities An economic model that strives for sustainable development without harming the environment
Inclusion	The policy or practice of including people who may be excluded or restricted due to various social, economic or cultural factors

Term	Description
Matrix of materiality	A management tool that helps organisations identify and prioritise the importance of various economic, environmental, and social issues to businesses and stakeholders
Onboarding	The process of adaptation and integration of new employees into the company
Hazardous waste	Hazardous waste Residues of solid, liquid or gaseous substances of natural or anthropogenic origin, the composition of which may be variable
Greenhouse gas coverage	• Scope 1: direct emissions from the company's activities • Scope 2: emissions from purchased energy consumption • Scope 3: emissions across the entire product value chain and employee transportation
Greenhouse gases	Greenhouse gases Gases in the atmosphere that trap heat and contribute to global warming, including carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O)
Parsing	Automated data collection and systematisation
Preferred shares	A type of stock that usually provides its owners with certain advantages, such as fixed dividends or priority in the liquidation of a company
Problem loans	Loans for which the borrower has difficulty paying interest or principal
Restructuring of loans	The process of changing the terms of lending to ease the financial situation of the borrower and reduce the risk of non-repayment of debt
Refactoring	The process of changing the internal structure of software without changing its external behaviour to improve readability and simplify support
Grading system	The system of calculating official salaries based on the point-factor method and matrix-mathematical models
Scoring map	A tool used to assess the creditworthiness of borrowers based on a set of criteria and statistical data
Staff turnover	The process of employees leaving the organisation at their request or at the initiative of the employer during a certain period
Tender	The formal process of offering and selecting suppliers of goods or services based on submitted applications
Fraud	Fraud, deception or illegal actions in the area of information technology committed in order to obtain illegal benefits

Abbreviation	Decoding	Abbreviation	Decoding
JSC	Joint Stock Company	CIT	Corporate income tax
ARDFM	The Agency for Regulation and Development of the Financial Market	MW	Megawatt
STB	Second-tier bank	MCI	Monthly calculated indicators
BCC	Bank CenterCredit	SME	Small and medium-sized businesses
MCU	Monitoring control unit	AIFC	Astana International Financial Center
RES	Renewable energy sources	NGO	Non-profit organisation
WPP	Wind power plant	OJSC	Open Joint Stock Company
Gcal	Gigacalories	UN	United Nations
SB	Subsidiary bank	OHS	Occupational health and safety
ICE	Internal combustion engine	OECD	Organisation for Economic Cooperation and Development
VHI	Voluntary health insurance	PJSC	Public Joint Stock Company
EAEU	Eurasian Economic Union	GHG	Greenhouse gases
EBRD	European Bank for Reconstruction and Development	UNDP	United Nations Development Program
CJSC	Closed Joint Stock Company	LLP	Limited Liability Partnership
KBTU	Kazakh-British Technical University	SDG	Sustainable Development Goals
kW	Kilowatt (power measurement unit)	AlmaU	Almaty Management University
PSE	Public State Enterprise	ATM	Automated Teller Machine

Abbreviation	Decoding	Abbreviation	Decoding
BCC	Bank CenterCredit	SSE	Sustainable Stock Exchanges
CBA	Cost-Benefit Analysis	SUCTF	Satbayev University Capture the Flag
CSA	Customer Satisfaction Analysis	TCFD	Task Force on Climate-related Financial Disclosures
CSI	Customer Satisfaction Index	UN	United Nations
CO_2e	Carbon Dioxide Equivalent	UNEP FI	United Nations Environment Programme Finance Initiative
DAU	Daily Active Users	VoC	Voice of the Customer
ECB	Eco Center Bank JSC		
ESG	Environmental, Social, and Governance		
GARP	Global Association of Risk Professionals		
GEFF	Green Economy Financing Facility		
GHG	Greenhouse Gases		
GRI	Global Reporting Initiative		
HR	Human Resources		
HSM	Hardware Security Module		
IFC	International Finance Corporation		
ISAE	International Standard on Assurance Engagements		
IPO	(Initial Public Offering)		
IT	Information Technology		
KASE	Kazakhstan Stock Exchange		
KPI	Key Performance Indicator		
MBA	Master of Business Administration		
NFGS	Network for Greening the Financial System		
NPS	Net Promoter Score		
PCAF	Partnership for Carbon Accounting Financials		
ROAA	Return on Average Assets		
ROAE	Return on average capital		
ROE	Rental on Capital		
S&P Global Ratings	Standard & Poor's		
SASB	Sustainability Accounting Standards Board		
SCR	Sustainability and Climate Risk certificate		
SDG	Sustainable Development Goals		
SLA	Service Level Agreement		
SREP	Supervisory Review and Evaluation Process		
SSE	Sustainable Stock Exchanges		

Annex I: Contacts

**Address: block C,
38 Al-Farabi Ave., Almaty**

**Website:
https://www.bcc.kz/**

Email: esg@bcc.kz

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We will be happy to receive your feedback.