

**Code of Corporate Ethics  
of KMF Bank JSC**

Business owner:	HR Department
Approved by:	Minutes of the Board of Directors dated July 15, 2025, No. 6
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## Contents

Section 1. General provisions.....	3
Section 2. Fundamentals of corporate culture .....	5
Section 3. Customer interaction.....	7
Section 4. Interaction with Bank employees .....	9
Section 5. Interaction with the shareholders of the Bank .....	9
Section 6. Interaction with government agencies .....	10
Section 7. Interaction with society .....	10
Section 8. Interaction with partners, suppliers, counterparties.....	11
Section 9. Interaction with competitors.....	11
Section 10. Relationship within the Bank .....	11
Section 11. Sustainable development .....	12
Section 12. Prohibition of unlawful actions .....	12
Section 13. Obligations of the Bank employees.....	14
Section 14. Final provisions .....	16

## **Section 1. General provisions**

1. This Code of Corporate Ethics of KMF Bank JSC (the “Code”) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter and internal regulations of KMF Bank JSC (the “Bank”), including the Bank’s Corporate Governance Code, taking into account international standards of business conduct and corporate governance.
2. This Code is part of the Bank’s corporate governance and contains rules of conduct and ethical principles that are mandatory for all Bank employees, regardless of their position and status.
3. The main objectives of this Code are as follows:
  - 1) the formation of a unified corporate culture based on high ethical standards;
  - 2) creating an atmosphere of trust, mutual respect and honesty in the Bank;
  - 3) establishing the fundamental principles and norms of corporate and business ethics that should guide all employees of the Bank, regardless of their position and status;
  - 4) ensuring effective interaction with interested parties through the application of best corporate and business conduct practices.
4. The following terms and definitions are used in this Code:
  - 1) bank ombudsman – an independent individual who resolves disputes arising from mortgage loan agreements between the Bank and individual borrowers upon their request, with the aim of reaching an agreement that satisfies the rights and legally protected interests of both the borrower and the Bank.
  - 2) business ethics – a set of ethical principles and standards of business conduct that all Bank employees adhere to and are guided by in their activities;
  - 3) discrimination – the restriction of rights and freedoms, as well as the provision of any advantages, depending on circumstances unrelated to a person’s business qualities;
  - 4) legislation of the Republic of Kazakhstan – a set of normative legal acts of the Republic of Kazakhstan adopted in accordance with the established procedure;
  - 5) stakeholders – customers, shareholders, employees, business partners of the Bank, other persons and entities involved in the Bank’s activities, interested in interacting with the Bank, having an influence on the Bank or being influenced by the Bank;
  - 6) confidential information – data that is private, secret, or has limited access for a specific group of persons;
  - 7) conflict of interests – a situation when a contradiction arises between personal interest of the officials, shareholders and/or employees of the Bank and their proper performance of their official duties, property and other interests of the Bank and/or its employees and/or clients, which will result in adverse consequences for the Bank and/or its clients;
  - 8) corporate governance – a system of relationships between the Bank’s Management Board, Board of Directors, shareholders, managers, and

- auditors, as well as relationships between the Bank's authorized collegial bodies;
- 9) corporate culture – a set of values, ethical standards of business relationships, and rules of conduct that affect the reputation of the Bank and trust, ensuring the achievement of the goals of the Bank and the growth of its attractiveness to customers, employees, and partners;
  - 10) corruption offense – an unlawful culpable act (action or inaction) that has signs of corruption, for which administrative and criminal liability is established by law;
  - 11) fraud – the theft of property belonging to someone else or the acquisition of the right to someone else's property through deception or abuse of trust;
  - 12) ML/FT – laundering (legalization) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction;
  - 13) responsible banking operations – alignment of the Bank's activities with the needs of society, proper compliance with the rules, norms, standards, and obligations adopted by the Bank, generally accepted moral and ethical norms, open and honest interaction with stakeholders, taking their opinions and interests into account in the Bank's decision-making process, responsibility for risk management in accordance with sustainable development goals, as well as transparency and accountability in the field of sustainable development;
  - 14) AML/CFT – countering the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction;
  - 15) employee of the Bank – an individual who is in an employment relationship with the Bank and directly performs work under an employment contract;
  - 16) reputation of the Bank – an established public opinion about the merits and shortcomings of the Bank's activities and the conduct of its officials and employees.
  - 17) authorized collegial body (the "ACB") – the Board of Directors of the Bank, committees under the Board of Directors, the Management Board, committees under the Management Board.
  - 18) authorized body – an authorized body for the regulation, control, and supervision of the financial market and financial organizations;
  - 19) harassment – a violation of personal boundaries and subordination, harassment, humiliation and violation of privacy.
  - 20) ESG – a concept of ethical business conduct based on the principles of environmental (E – Environmental), social (S – Social) and managerial (G – Governance) responsibility, including those aimed at ensuring the transition to responsible banking, reducing the negative impact on the environment and the social sphere, improving the quality of corporate governance and transparency.

## **Section 2. Fundamentals of corporate culture**

5. The corporate culture of the Bank is formed on the basis of the mission and the principles of interaction. The Mission indicates the highest goal and purpose of the Bank. The Principles of Interaction serve as guidelines that help to build and maintain an effective, trusting and transparent interaction environment.
6. The Mission of the Bank – The best financing for your business, reflects the strategy and market positioning of the Bank.
7. In carrying out its activities, the Bank:
  - 1) complies with the legislation of the Republic of Kazakhstan, the decisions of the General Meeting of Shareholders of the Bank, ACB, and other documents relating to the Bank's operations;
  - 2) ensures compliance with and respect for the rights, honor, and dignity of individuals and citizens regardless of their origin, social, official, or property status, gender, race, nationality, language, attitude toward religion, beliefs, place of residence, or any other circumstances;
  - 3) supports workforce diversity, including gender, ethnicity, and age diversity across key employee categories;
  - 4) creates a level playing field that promotes health and safety in the workplace, including emergency response training, first aid and fire safety training, and safe office buildings;
  - 5) ensures the non-disclosure of confidential information within the limits established by the legislation of the Republic of Kazakhstan and internal regulations of the Bank;
  - 6) ensures timely and accurate disclosure of information in accordance with the banking legislation of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan on state regulation, control, and supervision of the financial market and financial organizations, the legislation of the Republic of Kazakhstan on currency regulation and currency control, on payments and payment systems, on the securities market, on combating the legalization (laundering) of proceeds from crime and the financing of terrorism, on joint-stock companies;
  - 7) does not allow the granting of any privileges or benefits to individual officials and employees other than on a legal basis, while ensuring equal opportunities for all;
  - 8) is liable within the limits established by the legislation of the Republic of Kazakhstan.
8. The following are the Principles of Interaction adopted and communicated in the Bank:
  - 1) A happy customer is the basis of our goals;
  - 2) Healthy relationships – happy team;
  - 3) Act like a Leader;
  - 4) Finding optimal, rational solutions.
9. A happy customer is the basis of our goals:

- 1) the goal is primary in our actions;
- 2) we ask the question: “What are we doing this for?”;
- 3) we achieve a goal and set a new one.

10. Healthy relationships – happy team:

- 1) we build relationships honestly and openly;
- 2) we help and support by giving constructive feedback;
- 3) we talk about mistakes and learn from them;
- 4) we respect each other and thank each other for the experience.

11. Act like a Leader:

- 1) I constantly inspire, set an example, and recognize results of everyone;
- 2) I act decisively, improving our cooperation;
- 3) I boldly remove the boundaries of thinking and create new approaches to achieving goals.

12. Finding optimal, rational solutions.

- 1) we save time, money, and other resources – of the customers, the Bank, and each other;
- 2) we meet with purpose and walk away with results;
- 3) we back up arguments with numbers;
- 4) we reduce costs for a green, quality future.

13. The Bank attaches great importance to the formation of corporate social responsibility in business. The social responsibility of the Bank is expressed in achieving its success through ethical principles and respect for people, the public and the global community.

14. Key areas of social responsibility:

- 1) The Bank promotes the development of people, business, society, and the country.
- 2) The bank adheres to high standards and quality of service in its relations with customers, acts in the interests of customers, and strives to understand their needs as much as possible;
- 3) The bank pursues a responsible policy in the field of labor relations and social partnership with personnel, strictly complies with the requirements of the legislation of the Republic of Kazakhstan, adhering to the principle of equality;
- 4) The Bank adheres to the principle of openness and transparency in its activities towards customers, employees, shareholders, business partners, and other interested parties.
- 5) The Bank strives to take into account the impact of its activities on the environment, society, and people.

15. The corporate culture and team spirit of the Bank are based on:

- 1) the constant work of the heads of all structural subdivisions to create a team of followers united by a common vision;

- 2) principles of respect, politeness, goodwill, fairness, dignity and ethical attitude of the employees of the Bank towards colleagues, customers and other persons;
- 3) the active participation of employees in maintaining corporate traditions, which contributes to the development of corporate culture and internal cooperation;
- 4) tangible care for the professional development and career growth of personnel through training, mentoring, counseling.
- 5) creation of the Bank's personnel reserve from among proactive, professional employees;
- 6) clearly and explicitly constructed internal communications, excluding the possibility of double meaning, distortion or misinterpretation of information;
- 7) applying uniform standards for hiring, evaluating the performance of each employee, and promoting the Bank employees based on transparent criteria.

### **Section 3. Customer interaction**

16. The Bank adheres to a customer-centric strategy in its activities to provide high-quality customer financing.
17. To develop effective and long-term relationships and provide the best practices of high-quality service, the Bank uses advanced methods of working with clients – compliance with Standards of Service and Principles of Customer Protection.
18. The Bank adheres to 8 principles of customer protection in its activities:
  - 1) applicable development of products and delivery channels;
  - 2) preventing over-indebtedness;
  - 3) transparency;
  - 4) responsible pricing;
  - 5) fair and respectful treatment of customers;
  - 6) confidentiality of customer data;
  - 7) mechanisms for reviewing and resolving appeals (complaints);
  - 8) management's commitment to customer protection and its implementation in the HR system. The bank takes corrective action to prevent fraud and corruption, trains employees on customer protection issues, and evaluates and rewards employees based on social and financial criteria.
19. The Bank strives to establish long-term and trusting relationships with clients, actively supporting their growth and development.
20. The Bank employees always act with respect, honesty and openness, helping customers choose the products and services of the Bank that best meet their interests and needs.
21. The Bank does not discriminate against clients on political, religious, racial, national, gender or other grounds.
22. The Bank provides banking products and services in accordance with the legislation of the Republic of Kazakhstan, Charter, internal regulations of the Bank, and relevant agreements. The Bank conducts operations subject to licensing in

- accordance with the legislation of the Republic of Kazakhstan on the basis of a license issued by the authorized body for conducting banking and other operations.
23. The Bank guarantees the provision of accurate and truthful information, excluding any cases of deception or false information, in order to avoid misunderstandings or dissatisfaction on the part of customers.
  24. The bank shall post up-to-date information on rates and tariffs for banking services, including tariffs for payments and/or money transfers, indicating information about the dates of approval and changes to the current rates and tariffs, the numbers of internal regulations and the Bank's body that approved (adopted) them in its branches (their premises), in a place accessible for viewing and familiarization and on its website.
  25. Advertising of banking services is carried out in accordance with the requirements of the legislation of the Republic of Kazakhstan.
  26. The Bank provides customers with information on the terms and conditions of banking services and a list of documents required to conclude a banking service agreement, as well as a draft banking service agreement at the customer's request.
  27. The bank informs customers of their right to appeal to the bank, the bank ombudsman, the authorized body, or the court in the event of disputes arising from the banking services received.
  28. The Bank handles customer inquiries in accordance with the procedures established by the legislation of the Republic of Kazakhstan and the Bank's internal regulations.
  29. The Bank ensures objective, comprehensive, and timely consideration of inquiries from individuals and legal entities, and informs customers of the results of the consideration of their inquiries and the measures taken.
  30. If the customer's claim is justified and lawful, the Bank shall decide to remedy the violation and restore the customer's rights and legitimate interests.
  31. The Bank's interaction with a borrower who has overdue debt and/or his representative and/or a third party bound by obligations to the Bank under a bank loan agreement shall be carried out in accordance with the procedure established by the legislation of the Republic of Kazakhstan and the Bank's internal regulations.
  32. The Bank ensures the confidentiality of the information provided by the client. Disclosure of information relating to bank secrecy, as well as the provision (disclosure) of the client's personal data to third parties, is carried out with the client's written consent to the disclosure of bank secrecy and personal data, except in cases where the provision (disclosure) of information relating to bank secrecy and personal data is expressly provided for by the legislation of the Republic of Kazakhstan.
  33. The Bank establishes business relationships with customers, conducts customer transactions with money and/or other property, and terminates business relationships with customers in compliance with the requirements of the legislation of the Republic of Kazakhstan and internal regulations for the purposes of AML/CFT, including the Bank's sanctions policy.



#### **Section 4. Interaction with Bank employees**

34. The Bank builds relationships with employees based on the principles of long-term cooperation, mutual respect and rigorous fulfillment of mutual obligations.
35. The Bank does not allow any discrimination against employees based on political, religious, national, racial, gender or other distinctive features and characteristics in any aspect of its activities, including recruitment, remuneration, and career advancement.
36. The Bank adheres to the international principles set out in the following documents in its activities: The UN Universal Declaration of Human Rights, the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, and the UN Global Compact.
37. The Bank creates equal conditions for training, professional development and strives for continuous improvement and development of its employees.
38. The Bank provides an effective remuneration system and guarantees employees equal opportunities for career development in accordance with the results of personal effectiveness.
39. The Bank monitors the implementation of appropriate measures and compliance with the legislation of the Republic of Kazakhstan and internal regulations of the Bank in the field of occupational health and safety, ensuring the safety of employees.
40. The Bank strives to create and maintain an open and trusting atmosphere in the team, stimulating mutual respect, free exchange of information and suggestions for optimizing and improving processes.
41. The Bank strictly fulfills its obligations to employees stipulated by the current legislation of the Republic of Kazakhstan and employment contracts.
42. The Bank supports the active participation of employees in the life of the Bank, which contributes to the development of the Bank's corporate culture.
43. The Bank ensures the non-disclosure of confidential information concerning employees, within the limits established by the legislation of the Republic of Kazakhstan and internal regulations of the Bank.
44. The Bank respects the participation of employees in public, educational, research and entrepreneurial activities, provided that there is no negative impact of these activities on the Bank, as well as directly on the employee's performance of their official duties.

#### **Section 5. Interaction with the shareholders of the Bank**

45. Relationships with shareholders are based on the principles of openness, transparency of information, accountability and responsibility, which is consistent with the legislation of the Republic of Kazakhstan, the Charter and the Corporate Governance Code, as well as other internal regulations of the Bank.
46. The Bank respects the rights of all shareholders on equal terms and guarantees the protection of their interests, both in accordance with the legislation of the Republic of Kazakhstan and with the Bank's internal regulations.
47. The Bank strives to ensure long-term well-being of shareholders by increasing capitalization, implementing strategic objectives and reducing risks in its operations.

48. The Bank is committed to maintaining a high level of corporate governance, as well as professional and business ethics.

### **Section 6. Interaction with government agencies**

49. The Bank's interaction with government agencies, as well as with banking regulatory and supervisory authorities is based on the principles of compliance with the legislation of the Republic of Kazakhstan, transparency and cooperation.

50. During inspections or investigations, as well as in response to requests from government agencies, the Bank provides maximum assistance and provides detailed information within the time limits and scope established by law.

51. The Bank is a conscientious taxpayer and strives to implement best practices and procedures in its operations to ensure compliance with the tax legislation of the Republic of Kazakhstan.

52. The Bank ensures transparency of its activities by providing government agencies with complete and high-quality information about its work, including aspects of sustainable development, with the exception of confidential information.

53. The Bank excludes any attempts to use illegal or unethical methods to influence government decisions.

### **Section 7. Interaction with society**

54. The Bank understands its responsibility to society and strives to actively contribute to its development, creating value for all stakeholders. The Bank supports initiatives aimed at improving the quality of life, developing local communities and promoting sustainable growth.

55. The Bank's activities are aimed at solving social problems, improving financial literacy and promoting comprehensive solutions that contribute to the well-being of society.

56. The Bank acts openly and honestly in its relations with the public, ensuring the availability and reliability of information about its activities. The Bank strives for maximum transparency in reporting, performance and decision-making in order to maintain the trust of customers, partners and society as a whole.

57. The Bank aims to continuously improve communication channels and feedback with the society and other interested parties.

58. In its relations with the media, the Bank adheres to high ethical standards and does not allow the dissemination of false information, as well as concealment or distortion of facts in its advertising activities and other communications with the public.

59. The Bank supports projects that contribute to the growth of the country's economy, improve the quality of life, develop educational initiatives, as well as increase financial literacy and social responsibility.

60. The Bank maintains equal conditions for all groups of society, ensuring that there is no discrimination based on age, gender, nationality, religion or any other grounds.

## **Section 8. Interaction with partners, suppliers, counterparties**

61. The Bank cooperates with partners, suppliers, and counterparties on the basis of mutually beneficial terms, transparency, and full responsibility for fulfilling contractual obligations.
62. The Bank strictly adheres to all the norms of the legislation of the Republic of Kazakhstan, as well as statutory regulations and internal regulations of the Bank related to procurement.
63. Before concluding new or extending existing contracts, the Bank conducts a thorough review of its business partners, suppliers and counterparties.
64. When choosing suppliers of goods and services, the Bank focuses on high quality, favorable conditions and an impeccable reputation.
65. When choosing partners, suppliers, and counterparties to provide services, perform work, or supply goods, the Bank is guided by the principles of equality, fairness, and zero tolerance to discrimination.
66. The Bank complies with all terms of contracts with business partners, suppliers and counterparties and fulfills its obligations to them.
67. The Bank does not allow unfounded benefits and privileges to be provided to business partners, suppliers and counterparties, which may negatively affect its reputation.

## **Section 9. Interaction with competitors**

68. In its relations with competitors, the Bank adheres to the principles of honest, fair and free competition.
69. The Bank strictly adheres to the antimonopoly legislation, including the rules concerning fair competition.
70. The Bank guarantees that information about its competitors is collected and used in accordance with business ethics standards.
71. In case of disagreements or disputes in the competitive process, the Bank prefers to negotiate and seek middle ground.

## **Section 10. Relationship within the Bank**

72. The Bank supports the principles of honesty, respect and mutual assistance, expecting every employee to act within this paradigm in their daily activities.
73. The Bank encourages the creation of a respectful and constructive working environment where all employees support each other, adhere to high ethical standards and contribute to strengthening the corporate culture.
74. Bank employees should avoid situations where their personal interests may conflict with the interests of the Bank.
75. All employees of the Bank should report any potential or actual conflicts of interest and take steps to prevent them, including refusing to participate in decision-making that may lead to personal gain or impairment of interests of the Bank in the manner established by internal regulations of the Bank.

76. The Bank prohibits the exchange of gifts and favors that may affect the objectivity of decision-making or create the impression of a corruption offense or illegal influence. All gifts and offers received by employees must be transparent and comply with the laws and internal policies of the Bank.
77. The Bank respects the rights of employees established by the legislation of the Republic of Kazakhstan and the norms of international law, respects personal freedom, privacy and human dignity.
78. When performing their job duties, as well as while being on the Bank's premises, employees must strictly comply with the safety rules adopted and developed by the Bank in accordance with the policies of the Bank and the legislation of the Republic of Kazakhstan.
79. Violation of established safety rules, whether intentional or negligent, and thereby creating a threat to one's own life and health as well as that of others, constitutes a gross violation of labor discipline.

### **Section 11. Sustainable development**

80. The Bank is aware of the importance of implementing the principles of sustainable development and ESG in order to achieve long-term goals and create value for all interested parties. The Bank recognizes that economic growth is closely linked to environmental responsibility, social justice and high standards of corporate governance.
81. The Bank strives to cooperate with business partners whose views on sustainable development and commitments to environmental protection correspond to its own.
82. The Bank emphasizes the importance of environmentally responsible behavior among its employees and promotes their awareness of personal responsibility.
83. The Bank supports the conscious consumption of resources, separate waste collection, energy efficiency improvement and environmental initiatives aimed at protecting nature and combating climate change.

### **Section 12. Prohibition of unlawful actions**

84. The Bank takes a strict stance and makes every effort to prevent its employees from engaging in unlawful activities/actions, including fraud, deception, money laundering, and terrorism financing.
85. The Bank is intolerant of any form of corruption, fraud and deception and will not tolerate behavior from its employees in which they, using their official position, would receive improper and illegal enrichment for themselves and third persons or encourage such behavior from colleagues.
86. All employees of the Bank are prohibited from directly or indirectly, personally or through the mediation of third parties, participating in corruption activities, offering and receiving bribes, abusing powers, carrying out commercial bribery in order to simplify administrative and other procedures, or in order to obtain benefits in the form of money, valuables, other property or services of a proprietary nature, other property rights for themselves or for third parties.

87. All employees of the Bank are not allowed to receive and give expensive gifts or other benefits, with the exception of branded souvenir products in relations with partners, suppliers, representatives of government agencies, etc.
88. Symbolic favors, souvenirs in accordance with generally accepted norms of courtesy and hospitality or during protocol and other official events are allowed.
89. The Bank's main principles for preventing fraud, deception, and ML/TF are set out in the Bank's internal regulations.
90. When working with customers, counterparties, correspondent banks, and other financial institutions, all Bank employees must strictly comply with the requirements of the legislation of the Republic of Kazakhstan and internal regulations for the purposes of AML/CFT.
91. Before entering into business relations, before conducting a customer's transaction with money and/or other property, Bank employees must take the appropriate verification measures established by the legislation of the Republic of Kazakhstan and internal regulations for the purposes of AML/CFT.
92. Bank employees must report any cases of corruption, fraud, deception, or theft of Bank property and ML/TF that come to their attention to their immediate superiors, the security subdivision, the compliance subdivision, and the risk management subdivision.
93. Cases of corruption/fraud/theft and ML/TF may be identified based on reports from employees and other interested parties, with absolute confidentiality guaranteed.
94. Bank employees and other interested parties may confidentially report violations of the legislation of the Republic of Kazakhstan and the Bank's internal regulations, including non-compliance with ethical standards of conduct, illegal activities/actions, including fraud, corruption, bribery, deception, ML/TF, organization of pyramid schemes by Bank employees, participation, involvement, or admission of Bank employees to gambling and betting, intentional errors in the commission of which involve both Bank employees and employees of other financial organizations, contractors, suppliers, consultants, employees of third-party organizations that cooperate and/or have business relations with the Bank, by submitting a report:
- to the email address of the security subdivision [doverie@kmf.kz](mailto:doverie@kmf.kz);
  - to the email address of the compliance subdivision [conf.info@kmf.kz](mailto:conf.info@kmf.kz);
  - on the Internet resource of the Bank;
  - via phone number +77273317474.

Bank employees may additionally send a message via the Bank's internal corporate portal.

95. Bank officials and employees shall exercise a high degree of responsibility when working with data constituting confidential information, including personal data, in accordance with the legislation of the Republic of Kazakhstan and the Bank's internal documents, and shall take all necessary measures to protect such information.

96. Bank officials and employees are required to familiarize themselves with the Bank's internal regulations regarding the confidentiality of information. When performing their duties, Bank officials and employees must comply with these rules and procedures.
97. Bank employees must take care to prevent unauthorized access and disclosure of confidential information to other employees who do not have access to confidential information, as well as to any third parties outside the Bank, and must prevent the loss or destruction of data.
98. Bank employees must not disclose confidential information during the course of their employment, except in cases provided for by the legislation of the Republic of Kazakhstan, as well as after the termination of their employment at the Bank in accordance with their obligations.
99. Upon receiving information about a violation of the rules of confidentiality of information or a violation of the security of systems or devices, a Bank employee must immediately report this fact to the security subdivision in accordance with the procedure established by the Bank's internal regulation.

### **Section 13. Obligations of the Bank employees**

100. All employees of the Bank must follow the following principles of business communication in the course of their professional activities:
- 1) maintain and protect the business reputation and image of the Bank;
  - 2) when interacting with clients, colleagues, partners, counterparties and suppliers, adhere to honesty, openness, ethic and fairness;
  - 3) avoid any actions that may be perceived as patronage or providing benefits to individuals or employees of other organizations;
  - 4) ensure the confidentiality of the information received and not to use it for personal purposes or in the interests of third parties;
  - 5) not to enter into commercial relations with third parties if this may harm the interests of the Bank or negatively affect its reputation;
  - 6) contribute to the maintenance of corporate culture of the Bank;
  - 7) respect the privacy of colleagues and avoid interfering in it;
  - 8) treat corporate symbols with respect;
  - 9) show respect to colleagues, regardless of the purpose and place of interaction;
  - 10) behave in a respectable and dignified manner, avoiding insults and conflicts with colleagues, as well as observing generally accepted norms of business communication;
  - 11) observe ethical behavior in the office, at the workplace;
  - 12) strictly observe labor discipline, perform their job duties conscientiously, impartially, and efficiently, and use their working time rationally and effectively.
101. Bank managers in their relations with subordinates must:
- 1) set an example of impartiality, fairness, selflessness, and respect for the honor and dignity of the individual through their behavior;

- 2) ensure compliance with the principles of meritocracy, and not give preference to candidates based on kinship, regional ties, or personal loyalty when making personnel decisions;
  - 3) be fair and objective when evaluating their performance and applying incentives and penalties;
  - 4) take measures aimed at protecting labor and health, creating safe and necessary conditions for effective work, and creating a favorable moral and psychological atmosphere that excludes any form of discrimination and attacks on the honor and dignity of employees;
  - 5) not to use their official position to influence their activities when resolving non-official matters;
  - 6) not to force them to commit unlawful acts or acts that are incompatible with generally accepted moral and ethical standards;
  - 7) not to allow unfounded accusations, rudeness, humiliation, tactlessness, or inappropriate behavior towards them.
102. Employees of the Bank are prohibited from displaying unacceptable behavior towards customers, colleagues, partners, suppliers and counterparties:
- 1) physical or verbal attacks, aggressive behavior, arguments in harsh manner and in raised voices, with physical violence, with offensive gestures, with the use of obscene and informal expressions in speech;
  - 2) touching, patting, and other things that may be unpleasant to the person to whom such behavior is directed;
  - 3) offensive or inappropriate jokes, statements, taunts, obscene remarks;
  - 4) dissemination of false information discrediting the honor and dignity of a person or undermining his/her reputation;
  - 5) independently, without the participation and/or approval of the structural subdivision responsible for public relations, provide to the media any information or comments related to the activities of the Bank, its shareholders, business partners, clients;
  - 6) disseminate negative information on social media about the Bank, internal relationships between Bank employees, conflicts and other internal information that is unofficial and may have a negative impact on the image and reputation of the Bank;
  - 7) harassment and any kind of discrimination.
103. When speaking on behalf of the Bank, Bank officials and employees are required to comply with generally accepted standards of professional conduct and business ethics, to disseminate only accurate information, and to prevent the disclosure of confidential information.
104. The Bank prohibits actions related to religion and religious beliefs if they interfere with the performance of duties stipulated by the Constitution and laws of the Republic of Kazakhstan, or disrupt the work, manageability, and stability of the Bank. It is unacceptable to influence employees' participation in religious activities,

to coerce them into transferring property to religious associations, or to incite religious hatred or conflict.

105. Every employee of the Bank should take care of the positive reputation of the Bank, adhering to the established uniform style of clothing — dress code.
106. The Business casual style is established for all employees of the head office, branches and outlets of the Bank. Exceptions are outlet employees who are provided with branded corporate clothing, such as cashiers, service technicians, and personal managers.
107. Every employee of the Bank has equal opportunities to exercise their rights and freedoms at work.
108. Bank employees have the right to send their appeal directly to the Conciliation Commission and the Ethics Committee, established to respond to conflict situations, harassment, and any kind of discrimination, including those related to violations of ethical standards and rules of conduct.
109. The Conciliation Commission is a permanent body established at the head office on a parity basis from an equal number of representatives from the employer and employees. Bank employees can view the current composition of the Conciliation Commission on the internal corporate portal: <https://life.kmf.kz/>.
110. The Ethics Committee is an advisory body functioning on a permanent basis. The Ethics Committee was established to respond to cases of business ethics violations, diagnose the situation and determine the correct behavior for employees.
111. Employees can send an appeal to the Conciliation Commission and the Ethics Committee through the internal corporate portal.
112. Employees of the Bank who believe that they have been discriminated against in the field of labor have the right to apply to a court or other instances in accordance with the procedure established by the laws of the Republic of Kazakhstan.

#### **Section 14. Final provisions**

113. This Code shall be binding for all structural subdivisions of the Bank participating in the described process.
114. The Bank employees participating in the above described process shall be responsible for compliance with the requirements of this Code in accordance with the internal regulations of the Bank.
115. Responsibility for improper fulfillment and violation of the requirements of this Code rests with the heads of structural subdivisions involved in the process regulated by this Code.
116. This Code may be revised taking into account changes in the activities of the Bank, changes in the legislation of the Republic of Kazakhstan.
117. Issues not regulated by this Code shall be resolved in accordance with the requirements of the current legislation of the Republic of Kazakhstan and/or internal regulatory documents of the Bank.
118. This Code may be amended and/or supplemented only by decision of the Board of Directors of the Bank.