

Approved
by minutes to the meeting of the Board of Directors
of Halyk Bank JSC by absent voting
No.34 dated 18 July 2022

Halyk Bank JSC
Code of Ethics and Business Conduct

“We help people to realize their dreams using global experience, age-old brand reliability and professionalism of Halyk Group for economic and social prosperity of the whole society”.

Address from U.B. Shayakhmetova, CEO of the Bank

Compliance with the principles of business ethics and responsible conduct are the main elements of corporate culture in any company. Every day each of us makes decisions that may have financial and reputational consequences for the Bank, as well as affect people and society.

As the market leader in banking services, we carry the high title of the largest Bank in the country and therefore we must adhere to high standards of service and adhere to our commitment to transparency and business integrity.

This Code provides an updated interpretation of Halyk Bank's values and business principles, as well as general rules of ethics to which everyone who represents our Bank must adhere. I rely on the responsible attitude of each member of my team.

I believe that the Code will become a guideline for making the right decisions, a benchmark for conducting open and honest business, as well as for responsible and professional ethical conduct.

Everything we do today should be aimed at creating a better future, so this Code is designed to help us understand and appreciate the importance of the actions we take and our responsibilities within the scope of our missions.

In many ways, how Halyk Bank is perceived by those around us depends on each of us. Therefore, I encourage everyone to carefully read and understand the importance of this Code, and to ensure that all of its provisions are followed in the performance of their job responsibilities.

I believe that adherence to our corporate values, ethical conduct and high standards of conduct will enable Halyk Bank to reach new heights of sustainable development by securing the loyalty of all stakeholders.

The Bank's reputation depends on the conduct of each of us!

Chapter 1: Our values

1. Throughout several strategic cycles, we have remained committed to the following values, which are fundamental to us in building relationships with all our stakeholders and the society in which we live and work:

1) **customer focus:** we understand the needs of our customers and strive to direct all our resources to offer them the most effective solutions to achieve their goals;

2) **reliability:** we strictly comply with generally recognized principles and norms of international law, the legislation of the Republic of Kazakhstan, as well as the Bank's internal regulations and rules;

3) **leadership:** our employees demonstrate a dedicated attitude, enthusiasm and energy, which allows us to take leading positions in customer service in all market segments;

4) **social responsibility:** we focus on the needs and interests of all segments of the population and actively contribute to the development of society and social issues;

5) **honesty:** we strive for impeccably honest business conduct in all areas of activity, always and everywhere. We adhere to the principles of transparency of internal processes, building relationships with customers on the basis of mutual respect and trust, supporting the good faith attitude of employees and observing the norms of corporate ethics;

6) **professionalism:** we are focused on achieving the highest standards of professional activity, open to innovations and new ideas. Our main mission is to perform all customer service operations in good faith, in a timely manner and on the best terms, which will ensure strong and long-term customer relations.

Chapter 2: Applicability, Objectives and Principles of the Code of Ethics and Business Conduct

2. This Code of Ethics and Business Conduct in Halyk Bank JSC (the “Code”) contains mandatory standards of ethics and business conduct and is a guide and reference point in making the right decisions for each officer and employee regardless of their position, whether their work in Halyk Bank JSC (the “Bank”) is primary or part-time, as well as for third parties engaged under a contract of compensated services.

3. Our long-term success depends on each employee’s compliance with the provisions of this Code, the laws of the Republic of Kazakhstan and internal regulations in all aspects of our business. Working in unity and supporting each other, we will be able to achieve high standards of quality banking services, compliance with regulatory requirements and ethical standards of doing business in the country’s financial sector.

4. The Code has been developed in accordance with generally recognized principles and norms of international law, legislation of the Republic of Kazakhstan, corporate governance standards, on the basis of the Charter, Corporate Governance Code and other internal documents of the Bank, as well as business practices.

5. All documents of the Bank, including those formalizing relations with customers, business partners, state bodies, competitors and employees, shall be developed and approved taking into account the provisions of this Code. These documents in aggregate shall constitute a clearly formulated general framework for ensuring compliance with the requirements of business ethics and shall be important components of the structure of the Bank’s business ethics standards.

6. The missions of this Code are:

- 1) consolidation of the mission, values, principles, norms of business ethics and conduct that shall guide the Bank’s officials and employees in their activities;
- 2) development of a unified corporate culture based on high ethical standards, maintenance of an atmosphere of trust, mutual respect and decency in the team;
- 3) increasing and maintaining confidence in the Bank on the part of its shareholders, customers, business partners, government authorities, the public and other stakeholders, strengthening the reputation of an open and honest participant of the financial market;
- 4) promotion of effective interaction with stakeholders;
- 5) prevention of violations of the norms of the current legislation of the Republic of Kazakhstan by the Bank’s employees.

In cases when ethical standards established by this Code are higher than the standards defined by business practice and applicable law, the Bank will adhere to the standards of this Code.

7. The Code defines general principles of business ethics and business conduct that help us do the right thing:

1) **principle of fairness.** We adhere to and promote a culture of honest conduct at every stage of our activities, taking into account the rights and legitimate interests of parties when interacting with shareholders, customers, business partners, investors, government authorities, competitors, employees and other third parties, assisting them in obtaining necessary information. We strive to operate in an open manner, honoring our commitments as a part of contractual relations with consumers. We do not tolerate misrepresentation, use of false, unjustified offers and assurances in relation to the persons mentioned in this subclause;

2) **principle of justice.** We ensure equal and unbiased treatment of the rights and non-discrimination of investors, shareholders, employees and consumers, including persons with disabilities, in any form;

3) **principle of openness.** We ensure transparency of our activities, full and timely disclosure of information in accordance with the requirements of the legislation of the Republic of Kazakhstan. We promote the availability of clear and accessible to customers (without additional costs for timely receipt of information) rules of providing financial services, rules and amount of remuneration charged by the financial organization and additional costs. Timely notify the stakeholders of the risks associated with the Bank’s activities;

4) **principle of protection.** We ensure:

- protection of a customer’s assets (prevention of embezzlement of a customer’s funds);

- safeguarding commercial and banking secrets and other confidential information that became known to us in the course of performing our professional duties in the Bank;
- organization of reception and registration of consumer appeals, establishment of the procedure for preparing and sending responses to them;
- respectful attitude to customers, prevention of infringement of their honor and dignity, threats to customers and their property, as well as psychological pressure on them;
- providing assistance and support in overcoming barriers that prevent persons with disabilities from receiving financial services on an equal basis with other persons;
- protection of personal data of employees, customer and business partners;

5) **principle of preventing conflicts of interests.** We understand that the Bank's banking activities, successful solution of tasks and achievement of goals set for us are possible only if there are conditions for prevention and settlement of conflicts of interests. Therefore, in carrying out our professional activities we strive to prevent all kinds of conflicts of interest, and in case of such conflicts of interest, we follow the norms of Halyk Bank JSC Policy on Settlement of Conflict of Interest for their timely and favorable resolution;

6) **principle of responsibility.** We promote long-term sustainable development, increase of efficiency of the financial market and growth of trust among stakeholders, striving to carry out activities consistent with the principles of responsible business conduct;

7) **principle of combating fraud and abuse of authority.** We actively develop and implement policies and effective procedures to identify, prevent and avoid potentially questionable and abusive practices and conduct of the Bank's employees;

8) **anti-corruption principle.** The Bank in its activities adheres to the principle of zero tolerance to any kind of manifestation of corruption offenses. The Bank does not tolerate bribery, corruption or the granting of any favors, whether related to bank employees or officials, government officials or any other private individuals;

9) **principle of care and accuracy in the maintaining and keeping records and reports.** In preparing financial statements for management, investors, regulators and other stakeholders, we are committed to the preparation of accurate, complete and timely information. We ensure that management decisions are based on sound economic analysis, supported by comprehensive information on events, facts and an assessment of short- and long-term risks.

Chapter 3: Engagement with Employees

§ 1. Obligations of the Bank

8. As the largest bank in the country, the Bank realizes that staff is one of the key stakeholders whose competencies, engagement, unity and cohesion are the foundation of a successful business in the long term. Therefore, we shall strive to provide employees with an equally comfortable and safe working environment with fair working conditions, equal opportunities to participate in work processes, training and development, conducive to the realization of employees' potential and respectful interpersonal relationships, which in turn makes a valuable contribution to the achievement of the Bank's strategic objectives.

9. We shall not tolerate harassment, expressed in any form, discrimination on the basis of race, ethnic origin, color, nationality, gender, sexual orientation, disability, religion, age, marital status or status, or any other category protected by law, and guarantee employees protection from the manifestations referred to in this clause in accordance with the current legislation.

An employee of the Bank who believes that he/she is not protected from discrimination may contact the hotline number posted on the Bank's website "Halyk-info". By calling the above phone number, an employee may report information about facts of violation of principles of corporate ethics, violation of legislation by employees, including managers of the Bank. At the same time, the anonymity of the person concerned will be ensured if he or she wishes. Any concerns raised will be taken seriously and the situation will be investigated and appropriate action taken.

10. We shall ensure that employees are hired, paid and promoted based solely on their competence, performance, professionalism and personal qualities. We shall provide equal opportunities to

all employees and make all employment decisions based on sound business considerations such as experience, skills, education, performance of duties and adherence to the Bank's core values.

11. We shall unconditionally follow labor laws and advocate reasonable and efficient time management, keeping in mind the importance of work/life balance.

12. We shall not tolerate child labor or any form of forced labor, including modern slavery and human trafficking.

13. We shall ensure fair and just treatment of employees by addressing conflicts and potential employee misconduct based on verified facts and reliable information.

14. We shall provide young specialists with conditions that facilitate their early adaptation in the team, realization of their potential and effective work.

15. We shall strive to conduct our operations in a safe manner and prioritize the health and safety of our employees, our business partners and their employees who assist us in carrying out our activities.

16. We shall encourage the development of a risk management culture in which each employee feels responsible for reducing the risks of the business. Employees should pay special attention to possible risks in the performance of their duties. Employees should inform their immediate or superior manager, the Security Department, Internal Security Division or contact the helpline number posted on the Bank's intranet site "Halyk-info" about the presence or likelihood of risks that may cause losses to the Bank, if they become known to them.

17. We shall strive to hire qualified employees, developing their potential during their employment with the Bank, therefore we provide appropriate conditions and encourage professional development of employees by all available methods of training (mentoring, rotations, distance learning, corporate seminars, participation in external seminars and trainings) in accordance with the procedure and on the terms stipulated by the Bank's internal documents. Some duties in the Bank require certificates or other professional certifications and documents. Therefore, each employee shall be responsible for maintaining the qualifications necessary to perform his/her job. If an employee's credentials expire or are revoked, he/she must immediately notify his/her line or superior manager.

§ 2. Obligations of employees

18. By becoming a member of our team, employees shall undertake to:

- 1) familiarize themselves with the provisions of the Code and to be guided by them in their daily work, avoiding inappropriate conduct;
- 2) fulfill their functional duties in a timely and qualitative manner, striving to find an optimal solution and being responsible for the final result of their work;
- 3) in the course of labor activity observe the norms of business, professional and universal ethics, show respect and benevolent attitude towards the Bank's employees, business partners and customers of the Bank, be guided by high ethical standards, make well-considered decisions based on honesty, integrity and individual responsibility;
- 4) in order to minimize negative consequences and occurrence of risks for the Bank and/or other colleagues and/or persons, promptly notify colleagues and/or management of a mistake made or an error detected in the information system and documents in a timely manner;
- 5) refrain from any actions (inaction) that allow or encourage situations that may result in damage to business reputation, image, other intangible or material interests of the Bank and its subsidiaries, as well as obtaining personal enrichment or other benefits as a result of unethical conduct. In case of doubt about the ethicality of his/her actions (inaction) or third parties, immediately contact his/her line manager;
- 6) not to discriminate against colleagues, customers and partners on gender, age, race, political, religious and other grounds;
- 7) treat with respect all persons whom he/she deals with as a representative of the Bank and conduct himself/herself honestly towards such persons;
- 8) understand the value of cultural differences and not to discriminate on the basis of race, color, religion, age, gender, sexual orientation, marital status, ethnic origin or other grounds;
- 9) be oriented in their work towards the common result, develop the ability to work in a team, willingly share their knowledge, experience and ideas with colleagues;

10) be polite and respectful towards colleagues, customers, partners, shareholders and other stakeholders whom the Bank interacts with, be tolerant of other people's opinion, not allowing the use of coarse expressions, vulgar words, jargon and foul language in communication;

11) professionally, effectively and impartially perform their job duties guided by high ethical standards regulated in the Code in cooperation with stakeholders, interests and priorities of the Bank, as well as requirements of the legislation of the Republic of Kazakhstan;

12) refrain from any actions that allow or encourage the creation of conflict situations, manifestation of aggression, threats, violence, etc. In cases of disagreements with colleagues, customers, business partners and other stakeholders whom the Bank interacts with, make all reasonable efforts to resolve them;

13) develop communication skills to clearly formulate the message they want to convey to their colleagues, subordinates, managers, customers and partners and other stakeholders;

14) take care of the Bank's corporate resources (including but not limited to: property, money, intellectual property, reputation, rights, privileges, information and its sources, documentation, means and channels of communication, software, etc.), use them efficiently and carefully, do not use them for personal enrichment, benefit or any other activities not related to the Bank;

15) notify the line management about attempts of unauthorized persons to gain access to confidential information, as well as about loss or shortage of confidential information, its carriers, service IDs, passes, keys and other facts that may lead to unauthorized disclosure of confidential information;

16) in case of any questions regarding the application of this Code, doubts about the ethicality of his/her act or act of colleagues, customers, business partners and other third parties, to seek clarification of the norms from his/her immediate superior or to contact the hotline number posted on the Bank's website "Halyk-info". If there are any questions about the ethics of an act of an immediate or superior manager, contact directly the helpline or other communication channels specified in § 1 "Reporting Actual and Potential Violations" of Chapter 9.

§ 3. Additional obligations of the Bank's executives of any level

19. The Bank's managers, including members of the Bank's Board of Directors and the Bank's Management Board, as well as heads of structural units of all levels, in addition to the commitments listed in § 2 of this Chapter, shall undertake to:

1) ensure that subordinate employees are familiarized with the provisions of the Code and that the Code norms are observed and guided in their daily work;

2) make management decisions in accordance with the requirements of this Code and to strive to demonstrate by personal example their commitment to the provisions of the Code;

3) devote time to the creation of the Bank's personnel reserve, counseling and mentoring, team building into a team united by a common mission, values and principles;

4) not to give orders to subordinate employees and not to create situations putting them in a dependent position of choosing between fulfillment of the given order and compliance with the legislation of the Republic of Kazakhstan, the Code and/or internal regulatory documents;

5) ensure impartial and fair treatment of all employees of the Bank without exception, prevent any forms of discrimination of employees, as well as any forms of protectionism, granting illegal benefits and privileges to certain categories of employees;

6) provide attention and support when employees initiate discussion of ethical issues;

7) create an atmosphere of friendliness, trust and openness:

- in which an employee may bring up for discussion an item related to an employee's, subdivision's or the Bank's activities, as well as issues related to ethics and business conduct;

- aimed at creating equal favorable conditions for personal self-expression in the process of labor activity, increasing the efficiency of the Bank's work, as well as an atmosphere of responsibility, in which the Bank's employees not only refrain from committing illegal and/or questionable actions, but also actively react against committing such actions;

8) when assessing the employee's activity, take into account his/her compliance with the requirements of the Code and his/her contribution to the formation of the culture of conduct adopted by the Code in the Bank;

9) to support the employees' aspiration for active interaction of subordinate employees with responsible subdivisions of the Bank on ethics issues;

10) ensure inadmissibility of harassment against an employee who expresses concern or reasonably reports an actual or alleged violation of this Code, internal regulatory documents or legislation of the Republic of Kazakhstan;

11) clarify to a subordinate employee when he/she raises an issue concerning the application of this Code, doubts about the ethics of the employee's own behavior or the behavior of colleagues, customers, business partners and other third parties. If a manager has difficulties in explaining the issues specified in this subclause to an employee, he/she shall contact the responsible ethics department of the Bank.

Chapter 4. Relationships with the Bank's Shareholders

20. We pursue a unified and consistent policy on relations with shareholders, based on the principles of corporate governance enshrined in the Bank's Corporate Governance Code.

21. The fundamental principles in our relations with shareholders are:

1) providing shareholders with a real opportunity to realize their right to participate in the management of the Bank;

2) creating a real opportunity for the Bank's shareholders to participate in the distribution of the Bank's net income (receipt of dividends);

3) ensuring timely and complete presentation of the Bank's shareholders with reliable information concerning the Bank's financial position, economic indicators, performance results, the Bank's management structure in order to enable the Bank's shareholders and investors to make informed decisions;

4) ensuring equal treatment of all categories of the Bank's shareholders;

5) defining ethical norms for the Bank's shareholders.

22. We strive to ensure long-term welfare of the Bank's shareholders by increasing capitalization, implementing balanced strategic objectives and reducing risks in our activities.

Chapter 5. Relationships with Customers and Business Partners

23. Our employees should remember that building relations with potential and existing customers and business partners regardless of their legal or social status, type of activity, financial standing, length of service period with the Bank, age, religion, gender and ethnic nationality, as well as with representatives of state authorities is possible upon fulfillment of the following commitments:

1) to make efforts to minimize any risks of the Bank's customer and business partner. However, minimization of risks for the customer and business partner shall not lead to increase of risks of the Bank;

2) on legality, respectful attitude, good faith;

3) inviolability of commitments undertaken;

4) timeliness and completeness of disclosure of information stipulated by the legislation of the Republic of Kazakhstan;

5) priority of resolving disagreements through negotiations over court proceedings;

6) inadmissibility of rudeness, offensive gestures or expressions, aggressive, unfriendly, inattentive or neglectful attitude to our existing and potential customers and business partners;

7) inadmissibility of fraudulent actions;

8) inadmissibility of unjustified refusal of an employee of the Bank to fulfill his/her official duties in relation to a customer, business partner and representatives of state authorities;

9) inadmissibility of accepting money and/or other material benefits (including services, as well as personal benefits and preferences) for oneself personally and/or one's relatives and close ones in exchange for fulfillment of one's direct duties towards the Bank's customers and business partners, as well as acceleration of the process of banking operations.

24. We strive to fulfill our contractual obligations and value business relationships. We always negotiate contracts based on the principles of mutual respect and mutual benefit. When building business relations we strive to provide quality services at a high professional level. In case of a dispute, we strive to reach an optimal and fair solution for all parties.

25. We carefully consider and timely respond to comments, complaints and claims received by the Bank from shareholders, customers, depositors, creditors, business partners.

26. We make every effort to prevent corruption and other unlawful actions both on the part of state bodies and on the part of officials and employees of the Bank. The Bank shall conduct relations with state bodies in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and the Bank's internal documents, as well as the provisions of the Code of Corporate Governance on the basis of independence of the parties.

27. The Bank's employees:

1) shall undertake to timely and fully provide the Bank's customers with information on all terms and conditions of banking operations concerning them, if it is a part of their official duties, competence and determined by the Bank's internal documents;

2) shall undertake respectfully and attentively treat customers and business partners while performing their official duties, timely respond to comments, complaints and claims addressed to the Bank;

3) shall not be entitled to disclose the secrecy of bank account and bank deposit, account transactions and information on customers, as well as other information that may damage business reputation, other intangible or material interests of customers, unless disclosure of such information is provided for by the legislation of the Republic of Kazakhstan;

4) shall not be entitled to accept property, services, as well as to enter into agreements granting the right to receive property, services in the form of remuneration for activities performed as the Bank's employee;

5) shall not be entitled to perform any actions defaming business reputation, honor and dignity of customers and business partners of the Bank, as well as disclose information of confidential nature, as well as banking and commercial secrets, which became known to the Bank's employees as a result of performance of their official duties in respect of customers and business partners of the Bank;

6) shall not be entitled to transfer, when performing operations in the financial markets due to their official duties, any official information known to them for conclusion of transactions by third parties, as well as to conduct operations in their own interests ahead of fulfillment of orders of the Bank's customers and business partners.

28. If an employee of the Bank has information about committing improper and/or illegal actions (omissions) on the part of customers or business partners, as well as other persons in relation to the Bank, he/she shall immediately notify the Bank's management thereof.

Chapter 6. Relations with Government Officials and Competitors

29. Our relations with representatives of state authority, the public, as well as competitor organizations are based on the following principles:

- 1) compliance with the requirements of the legislation of the Republic of Kazakhstan;
- 2) compliance with the norms of corporate and business ethics;
- 3) honesty, openness and mutual respect;
- 4) independence and impartiality of the parties.

30. We interact with governmental authorities in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Bank, as well as the provisions of the Corporate Governance Code and this Code.

31. We make every effort to prevent corruption and other unlawful actions both on the part of state authorities and on the part of officials and employees of the Bank.

32. In our relations with competing organizations we shall be guided primarily by the principle of fair and free competition. Employees of the Bank should refrain from making statements that call into question the professional behavior of competitors, and should not support such statements by third parties. We also understand that our competitors' information is confidential, and we collect information about them only when it is publicly available or when its use does not violate legal or contractual obligations.

Chapter 7. Our Behavior

§ 1. Anti-corruption

33. All members of the Bank's team in fulfillment of their functional duties are guided by the principle of combating corruption in all circumstances and consider it their duty to promote the level of anti-corruption culture in society by not accepting corruption in any of its forms. Members of the Bank's Board of Directors, members of the Bank's Management Board and employees are prohibited to directly or indirectly, personally or through the intermediation of third parties, participate in corrupt practices, offer and receive bribes, abuse of authority, commercial bribery in order to simplify administrative and other procedures or 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. Gifts to family members, relatives who are not family members or other close persons of an employee of the Bank given in connection with performance by such employee of any actions (inaction) related to his/her functional and official duties in the Bank shall not be allowed.

34. Gifts and hospitality provided on behalf of the Bank or gifts received by members of the Bank's Board of Directors, members of the Bank's Management Board and the Bank's employees in connection with performance of their official duties from individuals or legal entities should comply with existing business customs, requirements of the current legislation of the Republic of Kazakhstan and the Bank's internal regulatory documents.

35. Each employee of the Bank should be careful in assessing the type, value, amount, circumstances and occasion of a gift or hospitality offered or received, as this may create an unreasonable expectation on the part of a third party or the impression that the employee favors a third party for reasons of personal benefit rather than for reasonable commercial reasons.

The concept and interpretation of gifts and hospitality varies according to different perspectives, so the receipt of gifts and hospitality should not have a potential impact on the decision-making process.

36. We expect our customers, counterparties, partners to comply with the requirements of the legislation of the Republic of Kazakhstan, the requirements of this Code in terms of combating corruption and the Bank's Anti-Corruption Policy.

§ 2. Conflict of interest

37. We ensure that decisions are made free from personal interest of an official and any employee making decisions at each stage of the process.

When performing labor activities in the Bank, our personal interest should not affect the objective and impartial performance of our job duties.

38. In order to minimize and exclude conflict of interest, we should make decisions based on the Bank's priorities and interests, perform our functional duties in good faith, timely report conflict of interest, and avoid extraneous business activities that take up a substantial part of our working time or otherwise adversely affect the Bank's operations.

39. In case of a conflict of interest, appropriate measures shall be taken to settle the conflict of interest in accordance with the procedure determined by the Policy on Settlement of Conflict of Interest in Halyk Bank JSC.

§ 3. Anti-money laundering and combating the financing of terrorism

40. We know our customers and other parties with whom we do business well and comply with applicable anti-money laundering standards. In cases where we suspect criminal behavior, we take appropriate measures, direct anti-money laundering and counter-terrorist financing internal control programs to prevent the use of services, transactions and operations, including international transactions, to launder money and finance terrorist activities. We do not engage in any activity in violation of applicable economic sanctions and do not provide services that could enable customers to violate applicable sanctions laws.

41. We strive to ensure compliance with requirements of law relevant to our business and have a culture of high integrity and zero tolerance for any violations of legal requirements applicable to the Bank's business. This includes, but is not limited to, oversight of the risks associated with money laundering and terrorist financing, including their timely detection, prevention and effective response.

§ 4. Disclosure of information

42. We ensure transparency and volume of information about our activities under the current legislation of the Republic of Kazakhstan and the requirements of the financial regulator. When disclosing information, we are guided by the principles of reliability, regularity, accessibility, promptness of its provision, balance between the Bank's openness and compliance with legislative norms and commercial interests.

§ 5. Communications on behalf of the Bank, public speeches, behavior in social networks

43. Open and honest communication is an important condition for maintaining the trust of our customers, shareholders and other stakeholders. We interact with mass media (the "Mass media") only through the unit responsible for public relations. All statements and information provided to the media are pre-approved by the Marketing and PR Department. If our employee receives a request from the media to provide any information related to the Bank's activities, he/she should forward the request to his/her manager. Each manager should direct such requests to the Marketing and PR Department.

44. We are careful about what information, including messages, we broadcast and disseminate through the internet or any other communication channels. Our employees understand that to the audience they are first and foremost representatives of the Bank, whether they are at work or not. This means that employees' personal page may be associated with the Bank's page.

When expressing certain views on community, national and global events in public speeches, publications or communications in online forums, social networks or external dialogues, or other information venues, we make it clear that these are our own views and do not necessarily reflect those of the Bank.

45. We also do not misrepresent the views of others as our own and comply with copyright and intellectual property laws. We should be aware that information posted both on the Internet and on the Bank's internal resources is often protected by copyright, and we may need permission from to further disseminate such information. It is equally important that our employees do not misrepresent the work of others as their own. Therefore, it is important to identify the author of the material when publishing it. Failure to do so may result in accusations of plagiarism.

§ 6. Confidential and insider information

46. We value the trust of our customers, each other (employees and management), the partners do business with and others we interact with. It is important to us to protect the confidentiality of information regardless of the way in which we receive it, whether verbally, by hard copy, email or some other form of communication. We respect the confidentiality and privacy of our customers, employees and others with whom we do business.

47. We obtain, store, use, transfer, block and destroy personal data, customer and other confidential information using transparent and trustworthy methods in accordance with the applicable laws of the Republic of Kazakhstan. Access to such information for the Bank's employees shall be provided only when necessary and within the limits of authority determined by the Bank's internal regulatory documents.

48. Our employees:

- 1) process personal data with due care in accordance with the Bank's internal regulatory documents and only for certain legitimate purposes;
- 2) ensure compliance with relevant contractual safeguards with third parties and service providers;
- 3) protect the information and the physical and electronic assets to which they have access. This includes protecting them from intentional threats and accidental loss.

49. We collect and store customer information only for purposes not contrary to the laws of the Republic of Kazakhstan.

50. We are mindful that our obligations to respect the confidentiality of information do not cease when we go out of business.

51. We never make transactions on the basis of insider information that became known to us in the course of our work in the Bank, and we do not disclose such information improperly. Our Bank ensures compliance with the laws of the Republic of Kazakhstan and foreign laws governing the use of insider information, as well as enhancing business reputation, maintaining a high degree of corporate governance, and ensuring the stability of Halyk Group. The list of insider information, the procedure of control over the disposal and use of insider information of the Bank, subsidiaries of the Bank and other legal entities in respect of which the Bank is recognized as an insider, the procedure and terms of its disclosure, maintenance of the list of insiders, restrictions imposed on insiders can be found in the Rules of Internal Control over Disposal and Use of Insider Information in Halyk Bank JSC.

Chapter 8. Social Responsibility

§ 1. Environmental protection

52. We strive to minimize direct and indirect impact on biological and physical natural systems, ensure optimal use of limited resources, apply and support the use of environmentally friendly, energy- and material-saving technologies, minimize negative impact on the environment in the course of our activities and when making corporate decisions. The Bank shall comply with the limits of negative environmental impact established by the legislation.

53. We strive to develop and implement our products and services in an environmentally friendly manner. This means that we pay attention to how our activities affect the environment.

54. We are constantly working to reduce the adverse environmental impact of our operations, seeking not only to use resources such as energy, water and raw materials efficiently and wisely within the Bank, but also to support projects related to recycling and green energy.

55. Each employee of the Bank is personally responsible for complying with applicable laws, this Code and the Bank's Environmental Policy, and for taking all necessary precautions to avoid environmental incidents.

§ 2. Charity and sponsorship

56. We are aware of our social responsibility to the public. One of the main principles of our activities is to focus on the needs and interests of the Bank's employees, the population in the regions where the Bank operates and society as a whole. The Bank strives to make an active contribution to the development of society and the resolution of social issues in accordance with the Bank's internal documents.

Support of various socially oriented charity and sponsorship projects both at the national and regional levels is an integral part of business Halyk Bank JSC. When implementing them, we, first of all, aim to create value for the whole society.

The Bank's social support and charity activities are implemented by in accordance with Halyk Bank JSC Rules for Charitable Assistance and are based on openness, dialog building, cooperation, partnership, transparency and financial sustainability. At the same time we support employees of in their desire to contribute to charity on a voluntary basis.

57. The priority areas of our social activities include financing projects in healthcare, education, support for culture, art, mass and professional sports, and environmental protection.

Chapter 9. Final Provisions

§ 1. Reporting actual and potential violations

58. The Bank shall have a firm position of conducting business on the basis of ethical principles and standards in accordance with the laws governing banking. Therefore, the Bank shall conduct internal audits of all suspected violations of the law, this Code and the Bank's internal regulations that are relevant to the Bank and that come to our attention.

Employees of the Bank may at any time report actual and potential violations of laws, this Code and internal regulations or potentially unethical or improper business practices to their immediate or superior manager or to the Security Department, Internal Security Division, Compliance Control Department and Human Resources Department. In addition, any third party who is not an employee of the Bank but is aware of the above violations may also report them to the Bank's listed services

59. It is possible to report the information:

- 1) via the helpline number posted on the Bank's intranet site "Halyk-info": +7-727-259-68-78;
- 2) via messengers WhatsApp/Telegram at +7-778-978-54-18;
- 3) via e-mail address: helpline@halykbank.kz.

At the same time, the Bank, in order to protect informants, shall guarantee confidentiality and anonymity (if necessary) of treatment under the current legislation of the Republic of Kazakhstan. The Bank shall be prohibited from prosecuting any person who, on reasonable grounds, reports a suspected violation of the law, this Code and the Bank's internal regulatory documents or potentially unethical or improper business practices.

60. If an employee or third-party whistleblower believes that they have been subjected to retaliation or retribution for reporting or intending to report an actual or potential violation, they should immediately inform any employee of the Internal Security Division.

§ 2. Training

61. To help our employees do their jobs properly, guided by the standards of this Code, we provide training that explains its provisions in an accessible manner. When a course on ethics and business conduct is scheduled, each employee is notified via corporate email.

§ 3. Amending and supplementing the Code

62. Approval of the Code, as well as amendments and additions thereto shall be carried out in accordance with generally recognized principles of international law, legislation of the Republic of Kazakhstan by resolution of the Board of Directors of the Bank based on recommendation of the HR and Remuneration Committee under the Bank's Board of Directors (the "HR Committee") and petition of the Bank's Management Board.

63. Issues on improvement of ethical standards aimed at enhancement of corporate culture in the Bank, including relevant training of employees, shall be considered by the HR Committee with preliminary issuance of recommendations to the Bank's Board of Directors.

§ 4. Liability for violation of the Code

64. We expect all our employees to fulfill their duties in accordance with the Bank's goals, values, this Code, the Bank's internal regulations and the laws of the Republic of Kazakhstan. In case of violation of the provisions of the Code and the Bank's internal regulatory documents, employees may be subject to disciplinary action in accordance with the laws of the Republic of Kazakhstan.

In cases of violation of the legislation of the Republic of Kazakhstan, civil and criminal liability is provided for employees.

65. The HR Department of the Bank shall monitor compliance with the Code. Responsibility for compliance with the Code shall be borne by structural subdivisions in their core area, providing information to the HR Department for consolidated reporting for review by the Human Resources Committee in accordance with Annex 1 hereto and, if there are violations, in accordance with Annex 2 hereto at least 1 (once) a year.

Clause 65 was amended. Minutes to the meeting of the Bank's Board of Directors by absent voting No.32 dated 30.06.2025.

Annex 1
to Halyk Bank JSC
Code of Ethics and Business Conduct

Report on compliance by the Bank employees with the principles and provisions of Halyk Bank JSC Code of Ethics and Business Conduct

No.	Principles and provisions of Halyk Bank JSC Code of Ethics and Business Conduct	Measures taken to implement the principles and provisions of Halyk Bank JSC Code of Ethics and Business Conduct
1	Chapter 2. Applicability, Objectives and Principles of the Code of Ethics and Business Conduct	
2	Principle of fairness	
3	Principle of justice	
4	Principle of openness	
5	Principle of protection	
6	Principle of preventing conflicts of interest	
7	Principle of responsibility	
8	Principle of combating fraud and abuse of authority	
9	Anti-corruption principle	
10	Principle of care and accuracy in maintaining and keeping records and reports	
11	Chapter 3. Engagement with Employees	
12	§ 1. Obligations of the Bank	
13	§ 2. Obligations of employees	
14	§ 3. Additional obligations of the Bank's executives of any level	
15	Chapter 4. Relations with the Bank's Shareholders	
16	Chapter 5. Relations with Customers and Business Partners	
17	Chapter 6. Relations with Government Officials and Competitors	
18	Chapter 7. Our Behavior	
19	§ 1. Anti-corruption	
20	§ 2. Conflict of interest	
21	§ 3. Anti-money laundering and combating the financing of terrorism	
22	§ 4. Disclosure of information	
23	§ 5. Communications on behalf of the Bank, public speeches, behavior in social networks	
24	§ 6. Confidential and insider information	
25	Chapter 8. Social Responsibility	
26	§ 1. Environmental protection	
27	§ 2. Charity and sponsorship	
28	Chapter 9. Final Provisions	
29	§ 1. Reporting actual and potential violations	
30	§ 2. Training	
31	§ 3. Amending and supplementing the Code	
32	§ 4. Liability for violation of the Code	

**Report on Halyk Bank JSC Code of Ethics and Business Conduct
upon violations**

No.	Violation of Halyk Bank JSC Code of Ethics and Business Conduct recorded during the reporting period	Violated principle, clause	Method and date of detection	Actions taken to resolve and prevent the violation

Annex 1 and 2 were amended. Minutes to the meeting of the Bank's Board of Directors by absent voting No.32 dated 30.06.2025.