

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

Code of Ethics and Business Conduct at Halyk Bank JSC

Halyk Group Mission for 2022-2024

“We help people make dreams come true by leveraging global expertise, century-long brand reliability and professionalism of Halyk Group for economic and social prosperity of all society”.

Address by Umut Shayakhmetova, CEO

Business ethics and responsible behaviour are core elements of the corporate culture in any company. Each of us makes decisions every day that can have financial and reputational consequences for the Bank and affect people and the society.

As a leader in banking industry, we hold the distinguished title of the country’s largest bank and must therefore adhere to high standards of service, with a commitment to transparency and integrity in our business practices.

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

I believe that the Code of Ethics will become a reference point for good decision-making, a benchmark for open and honest business as well as responsible and professional ethical behaviour.

Everything we do today should be aimed at creating a better future, so this Code of Ethics is designed to help us understand and correctly assess the importance of the actions we take and our responsibilities in the tasks at hand.

In many ways, how Halyk Bank is perceived by a wider public depends on each of us. I therefore urge everyone to carefully read and understand the importance of this Code of Ethics, and to ensure that you comply with all of its provisions in the performance of your job duties.

I believe that adherence to our corporate values, ethics and high standards of conduct will enable Halyk Bank to reach new heights of sustainability by ensuring the loyalty of all stakeholders.

The Bank’s reputation depends on the behaviour of each and every one of us!

Chapter 1. Our values

1. Over 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 communities in which we live and work:

1) **customer focus:** we understand the needs of our customers, and therefore commit to use all our resources for offering customers the most efficient solutions to help them achieve their goals;

2) **reliability:** we shall rigorously comply with the general principles and norms of international law, legislation of Kazakhstan, internal provisions and regulations of the Bank;

3) **leadership:** Our employees demonstrate the dedication, enthusiasm and energy that make us a leader in serving customers 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 the resolution of social issues;

5) **integrity:** we strive to operate impeccably honest business in all spheres, always and everywhere. We adhere to principles of transparency in internal processes, building mutually respectful and trustworthy relationships with customers, maintaining honest attitude towards business from employees, compliance with the corporate ethics;

6) **professionalism:** we aim to achieve the highest professional standards and are open to innovations and new ideas. Our main goal is to render customer service in a conscientious, timely manner and on the best terms to ensure firm and long-lasting relationships with customers.

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 of Ethics”) contains mandatory standards of ethics and business conduct and is a guide and benchmark in making correct decisions for each officer and employee regardless of the position held, whether the work with Halyk Bank JSC (the “Bank”) is a full-time or part-time job, as well as for third parties engaged under a fee-based service contract.

3. Our long-term success depends on each employee’s compliance with this Code of Ethics, legislation of the Republic of Kazakhstan and internal regulations in all aspects of our business. By working together in unity and supporting each other, we can achieve high quality standards of banking services, compliance with regulatory requirements and ethical business practices in the country’s financial sector.

4. The Code of Ethics 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 customary business practices.

5. All documents of the Bank, including those formalizing relationships with customers, business partners, government agencies, competitors and employees, are developed and approved taking into account the provisions of this Code of Ethics. Taken together, these documents provide an explicit overall framework for compliance with business ethics requirements and are important components of the Bank’s business ethics framework.

6. The purpose of this Code of Ethics is:

1) consolidation of the mission, values, principles and standards of business ethics and conduct guiding officers and employees of the Bank in the performance of their duties;

2) development of a common corporate culture based on high ethical standards, maintenance a team spirit of trust, mutual respect and integrity;

3) enhancing and maintaining the trust of shareholders, customers, business partners, public authorities, the general public and other stakeholders in the Bank and strengthening its reputation as an open and fair player of the financial market

4) facilitating effective interaction with stakeholders;

5) prevention of violations of the current legislation of the Republic of Kazakhstan by the Bank’s employees.

In those cases where ethical standards set out in this Code of Ethics are higher than those defined by business practices and applicable law, the Bank will adhere to the standards of this Code of Ethics.

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

1) **Integrity.** We maintain and promote fair play culture at every stage of our operations, taking into account the rights and legitimate interests of parties in interactions with shareholders, customers, business partners, investors, government agencies, competitors, employees and other third parties and facilitating them in obtaining necessary information. We strive to operate in an open manner, adhering with obligations we have made in our contractual relations with our customers. We do not tolerate misleading, false, unsubstantiated offers and representations with respect to the persons mentioned in this sub-clause;

2) **Justice.** We ensure equal and impartial treatment of rights and non-discrimination against investors, shareholders, employees and costumers, including those with disabilities, in any form;

3) **Transparency.** 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 facilitate the availability of understandable and accessible rules to customers for providing financial services, the rules and the amount of fees and additional costs charged by the financial institution (without additional costs to obtain information in a timely manner). We timely notify stakeholders of the risks associated with the Bank’s activities;

4) **Protection.** We ensure:

- protection of customers' assets (prevention of theft of customers' funds);;
- protection of commercial, banking secrets and other confidential information that has become known to us in the course of our professional duties at the Bank;
- receipt and registration of customer inquiries, establishment of the procedure for preparation and sending responses thereto;
- respectful treatment of customers, prevention of infringement of their honour and dignity, prevention of threats to customers and their property, as well as prevention of psychological pressure on customers;
- providing assistance in overcoming barriers that prevent people with disabilities from obtaining financial services on an equal basis with others;
- protection of personal data of employees, customers, business partners;

5) **Prevention of conflicts of interest.** We understand that the Bank's banking activities, successful achievement of its goals and objectives are only possible if the conditions for the prevention and settlement of conflicts of interest are in place. In our professional activities, we seek to prevent the emergence of various conflicts of interest, and in case of the emergence, we are guided by the Conflict of Interest Policy of Halyk Bank JSC for their prompt and successful resolution;

6) **Responsibility.** We promote long-term sustainable development, financial market efficiency and trust among our stakeholders by striving to conduct business in a responsible manner;

7) **Countering fraud and abuse of power.** We actively develop and implement policies and effective procedures to identify, prevent and deter potentially questionable and abusive practices and behaviours of Bank employees;

8) **Combating corruption.** In its activities, the Bank adheres to the principle of zero tolerance for any form of corruption offences. The Bank does not tolerate bribery, corruption, or granting of any benefits, regardless of whether it is related to bank employees or officers, government officials or any other individuals;

9) **The principle of care and accuracy in the maintenance and keeping records and reports.** When preparing financial statements for management, investors, regulators and other stakeholders, we are committed to the preparation of accurate, complete and timely information. We make sure that management decisions are based on thorough economic analysis supported by information on events, facts and assessments of short- and long-term risks.

Chapter 3. Relationship between Employees and Bank

§ 1. Obligations of the Bank

8. Being the largest bank in the country, the Bank understands that staff are one of key stakeholders whose competencies, engagement, unity and cohesion are the foundation of a successful business in the long run. Therefore, we 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, facilitating the fulfillment of employees' potential and respectful interpersonal relationships, which in turn makes a valuable contribution to achieving the Bank's strategic goals.

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

Any employee of the Bank who feels that he/she is not protected from discrimination may contact the hotline number posted on the Bank's Halyk Info intranet. By calling this number, the employee can report violations of the principles of corporate ethics or violations of the law by employees, including the Bank executives. At the employee's request, he/she may remain anonymous. Any concerns raised will be taken seriously and the situation will be investigated and appropriate action will be taken.

10. We ensure that employees are recruited, paid and promoted based solely on their competence, efficiency, professionalism and personal qualities. We provide equal opportunities to all employees and make all employment decisions based on sound business considerations such as experience, skills, education, performance and adherence to the Bank's core values.

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

12. The use of child labour and all forms of forced labour, including modern slavery and human trafficking, is unacceptable.

13. We ensure that employees are treated fairly and honestly by dealing with conflicts and possible employee misconduct on the basis of verified facts and reliable information.

14. We provide young professionals with an environment that encourages them to adapt quickly, fulfil their potential and work effectively.

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

16. We encourage the development of the risk management culture, where every employee feels responsible for mitigating the risks of the activities carried out. Employees should pay particular attention to possible risks in carrying out their duties. Employees should inform their line manager or supervisor, Security Department, Internal Security Division or contact the hotline number posted on the Bank's Halyk Info intranet about the existence or likelihood of risks that could lead to losses for the Bank, if they become aware of them.

17. We strive to recruit qualified employees by developing their potential during their employment with the Bank, so we provide appropriate conditions and encourage the professional development of employees by all available training methods (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 at the Bank require certificates or other professional ID cards and documents. Each employee is therefore responsible for maintaining the qualifications required to perform his or her job. If an employee's credentials expire or are withdrawn, he or she should inform his or her line manager or supervisor immediately.

§ 2. Obligations of Employees

18. By becoming a member of our team, the employees undertakes to:

1) familiarize themselves with the provisions of the Code of Ethics and be guided by them in their daily work and avoid inappropriate behaviour;

2) perform their functional duties in a timely and efficient manner, striving to find the best solution and to be accountable for the outcome of their work;

3) comply with the standards of business, professional and universal human values and ethics, show respect and goodwill towards the Bank's employees, business partners and customers, be guided by high ethical standards, make deliberate decisions based on honesty, human decency and individual responsibility during the period of employment;

4) inform colleagues and/or management in a timely manner of an error or error detected in the information system and documents in order to minimize negative consequences and risks for the Bank and/or other colleagues and/or persons;

5) refrain from any actions or (omissions) that allow or encourage situations that may cause damage to goodwill, image, other intangible or material interests of the Bank and its subsidiaries, as well as personal gain, other benefits resulting from unethical behavior. If in doubt about the ethics of one's actions (or inaction) or those of third parties, contact your line manager immediately;

6) not to discriminate against colleagues, customers and partners on gender, age, race, political, religious or other grounds;

7) treat all persons with whom he/she deals as a representative of the Bank with respect and behave fairly towards such persons;

8) understand the value of cultural differences and do not discriminate on grounds of race, colour, religion, age, gender, sexual orientation, marital status, ethnic origin or other grounds;

9) to focus on common goal in their activity, develop teamwork skills, willingly share their knowledge, experience and ideas with colleagues;

10) to be polite and respectful to colleagues, customers, partners, shareholders and other stakeholders with whom the Bank interacts, to be tolerant to the opinions of others, avoid use of coarse expressions, vulgar words, slang and profanity;

11) perform their job duties professionally, effectively and impartially, guided by high ethical standards as set out in the Code of Ethics, teaming up with stakeholders, the interests and priorities of the Bank and the requirements of the legislation of the Republic of Kazakhstan;

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

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

14) take care of the Bank 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 and etc.), use them in efficient and gentle manner, do not use them for personal gain, benefit or any other activities not related to the Bank;

15) notify a line manager of attempts by unauthorized persons to gain access to confidential information, as well as the loss or shortage of confidential information, its carriers, staff cards, badges, keys, and other facts that may lead to the unauthorized disclosure of confidential information;

16) If any question arise with regard to the application of this Code of Ethics and if there are doubts regarding the rightness of their own actions or the actions of colleagues, customers, business partners and other third parties, seek clarification of the regulatory requirements from their line manager or contact the hotline number posted on the Bank's Halyk-Info intranet. In the event of questions about the ethical conduct of a line manager or a supervisor, contact the hotline directly or through other communication channels specified in § 1 of Chapter 9 "Reporting actual and potential violations".

§ 3. Additional Duties of the Bank Executives at All Levels

19. The Bank executives, including members of the Board of Directors and the Management Board of the Bank, as well as heads of structural subdivisions at all levels in addition to the obligations listed in § 2 of this chapter, undertake to:

1) ensure that subordinate employees are made aware of the provisions of the Code of Ethics and that they comply with and are guided by the Code of Ethics in their daily work;

2) make management decisions consistent with the requirements of this Code of Ethics and strive to lead by example by demonstrating commitment to the provisions of the Code of Ethics;

3) devote time to building the Bank's talent pool, counselling and mentoring, and building 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 position of dependence by making them choose between the execution of an instruction issued and compliance with the legislation of the Republic of Kazakhstan, the Code of Ethics and/or internal regulatory documents;

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

6) provide attention and support when workers initiate discussions on ethical issues;

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

- in which an employee may raise an issue relating to the employee, the subdivision or the Bank, as well as issues relating to ethics and business conduct;

- which is aimed at creating equal favorable conditions for self-manifestation of the person in the course of employment, improving the efficiency of the Bank, as well as the atmosphere of responsibility, in which employees of the Bank not only refrain from committing illegal and/or questionable actions, but also actively react against such actions;

8) when assessing an employee's performance, take into account his/her compliance with the Code of Ethics and his/her contribution to the cultural behavior adopted by the Code of Ethics at the Bank;

9) support employees' willingness to actively engage subordinate employees with the Bank's responsible departments on ethics issues;

10) ensure that no retaliation against an employee who raises a concern or reasonably reports an actual or suspected breach of this Code of Ethics, internal regulations or legislation of the Republic of Kazakhstan is tolerated;

11) explain to a subordinate employee, when he/she asks a question concerning the application of this Code of Ethics, doubts regarding the ethical conduct of the employee or the conduct of colleagues, customers, business partners and other third parties. If, when explaining the matters referred to in this sub-clause to the employee, the manager encounters difficulties, he/she should contact the responsible ethics subdivision of the Bank.

Chapter 4. Relationships with the Bank's Shareholders

20. We pursue a unified and consistent shareholder relations policy based on the corporate governance principles set out in the Bank's Corporate Governance Code.

21. The fundamental principles in engaging with shareholders are as follows:

- 1) providing a real opportunity for the shareholders to exercise their right to participate in the management of the Bank;
- 2) providing a real opportunity for the Bank's shareholders to participate in the distribution of the Bank's net income (receiving dividends);
- 3) providing timely and complete information to shareholders regarding financial position of the Bank, economic indicators, performance results, management structure of the Bank to enable shareholders and investors to make informed decisions;
- 4) ensuring equal treatment of all categories of the Bank's shareholders;
- 5) defining ethical norms for shareholders of the Bank.

22. We are committed to providing long-term well-being of the Bank's shareholders by increasing capitalization, implementation of the balanced strategic objectives and reduction of risks in our operations.

Chapter 5. Relationships with Customers and Business Partners

23. Our employees need to remember that building relationships with potential and existing customers, business partners regardless of their legal or social status, type of activity, financial situation, length of the period of servicing with the Bank, age, religion, gender and ethnicity, as well as with representatives of state authorities are possible if the following obligations are fulfilled:

- 1) undertake efforts to minimize any risks of the Bank's customer and business partner. However, minimizing risks of the customer and the business partner must not lead to an increase in the Bank's risks;
- 2) on lawfulness, respectful attitude, good faith;
- 3) inviolability of undertaken obligations;
- 4) complete disclosure of information in a timely manner as provided for in the legislation of the Republic of Kazakhstan;
- 5) the priority of negotiated settlement over litigation;
- 6) manifestations of rudeness, insulting gestures or expressions, aggressive, ill-natured, or careless neglect to our existing and potential customers and business partners;
- 7) committing fraudulent actions is unacceptable;
- 8) unjustified refusal of the Bank employee perform his or her official duties towards a customer or a business partner and representatives of state authorities is unacceptable;
- 9) accepting money and/or other material goods (including services, as well as personal benefits and privileges) for themselves and/or their relatives for the execution of their direct duties in relation to customers as well as accelerating the process of performing banking operations is unacceptable.

24. We are committed to fulfilling contractual obligations and value business relationships. We always negotiate contracts on the basis of mutual respect and mutual benefit. When building business relationships, we strive to provide quality services in a highly professional manner. In the event of a dispute, we aim to reach an optimal and fair solution for all parties.

25. We carefully consider and respond in a timely manner to comments, complaints and claims made to the Bank by shareholders, customers, depositors, creditors and business partners.

26. We make every effort to prevent corruption and other unlawful actions both by state authorities and by Bank officers and employees. The Bank maintains relations with the state authorities in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and the internal documents of the Bank, as well as the provisions of the Corporate Governance Code on the basis of independence of the parties.

27. The Bank employees:

1) are required to submit an accurate and complete information to the Bank customers on all terms and conditions of banking transactions concerning them, if this falls within their job duties, competence and is defined in the Bank's internal documents;

2) must be respectful and considerate towards customers and business partners in the performance of their duties, respond to comments, complaints and grievances against the Bank in a timely manner;

3) may not divulge the secrecy of a bank account and a bank deposit, account transactions and customer information, as well as other information that may damage the business reputation, other intangible and tangible interests of customers, unless the disclosure of such information is not provided by the legislation of the Republic of Kazakhstan;

4) may not take the property, services, as well as enter into contracts entitling them to receive property, services as remuneration for the activity performed in the capacity of the Bank employee;

5) may not perform any actions damaging the business reputation, honour and dignity of customers and business partners of the Bank, as well as disclose information of a confidential nature, including banking and commercial secrets, which have become known to the Bank employees as a result of their official duties in relation to the Bank customers and business partners

6) may not pass on any information known to them by virtue of their official duties when carrying out transactions on the financial markets for the benefit of third parties, or carry out transactions in their own interests ahead of the orders of the Bank's customers and business partners, due to their official duties.

28. B If an employee of the Bank becomes aware of improper and/or unlawful actions (omissions) on the part of customers or business partners or 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 relationships with representatives of government agencies, the general public, as well as competing organizations are based on the following principles:

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

30. We interact with state authorities in accordance with the requirements of the laws of the Republic of Kazakhstan, the Bank's Charter and internal regulations, as well as the provisions of the Corporate Governance Code and this Code of Ethics.

31. We make every effort to prevent corruption and other illegal activities on the part of both state authorities and Bank officers and employees.

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

Chapter 7. Our Behaviour

§ 1. Countering Corruption

33. All members of the Bank's team shall be guided in the performance of their functional duties by the principle of countering corruption in all circumstances and shall consider it their duty to promote an anti-corruption culture in society by not accepting corruption in any of its forms. Members of the Board of Directors of the Bank, members of the Management Board of the Bank and employees of the Bank shall not, directly or indirectly, personally or through third parties, engage in corrupt practices, offer and accept bribes, abuse of power, in commercial bribery in order to facilitate administrative and other procedures or to obtain benefits in the form of money, valuables, other property or monetizable services, other property rights for themselves or for third parties. No gifts may be given to family members, relatives who are not family members or other close persons of an employee of the Bank in connection with any actions (omissions) performed by such employee related to his/her functional and official duties at the Bank.

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

35. Each employee of the Bank should exercise caution in assessing the type, value, amount, circumstances and reason for the 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 is favouring the third party for reasons of personal gain rather than for legitimate business reasons.

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

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

§ 2. Conflict of Interest

37. We make sure that decisions are taken free from the personal interest of an officer and any decision-making employee at every stage of this process.

Our personal interests shall not affect the objective and impartial performance of our job duties during our employment with the Bank.

38. To minimize and avoid conflicts of interest, we must make decisions based on the Bank's priorities and interests, perform our job duties in good faith, report conflicts of interest in a timely manner, 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 the event of a conflict of interest, appropriate action should be taken to resolve the conflict of interest in accordance with the procedure set out in the Policy on Settlement of Conflicts of Interest at JSC Halyk Bank.

§ 3. Countering Money Laundering the Proceeds of Crime and 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 the cases, where we suspect criminal behaviour, we take appropriate action, direct anti-money laundering and counter-terrorist financing internal control programs to prevent services, transactions and transactions, including international ones, from being used for money laundering and terrorism financing. We do not conduct any activity in breach of applicable economic sanctions and do not provide services that would allow customers to violate applicable sanctions laws.

41. We aim to ensure compliance with legal requirements relating to our business and maintain a culture of high integrity and zero tolerance for any breaches of legal requirements applicable to the Bank's business. This includes, among other things, the oversight of money laundering and terrorism financing risks, including their timely detection, prevention and effective response.

§ 4. Disclosure of Information

42. We ensure the transparency and scope of information about our operations within 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, and a balance between the Bank's openness and compliance with legal regulations and commercial interests.

§ 5. Communications on behalf of the Bank, Public Presentations, Behaviour in Social Media

43. Open and honest communication is essential for maintaining the trust of our customers, shareholders and other stakeholders. We only interact with mass media outlets (the "media") through the subdivision 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 for any information related to the Bank's activities, he or she must forward the request to his or her supervisor. Every manager must forward such requests to the Marketing and PR Department.

44. We are careful about what information, including messages, we broadcast and distribute via Internet or any other communication channels. Our employees understand that to the audience, they, first and foremost, are representatives of the Bank, whether they are in the workplace or not. This means that employees' personal accounts in social media can be associated with those of the Bank.

When expressing certain views on the events in the society, in the country and in the world in public speeches, publications or communications in online forums, social media or external dialogues, or in another information realm, we make it clear that these are our own views, which do not necessarily coincide with those of the Bank.

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

§ 6. Confidential and Insider Information

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

47. We receive, store, use, transfer, block and destroy personal data, customer and other confidential information using transparent and trustworthy methods in accordance with applicable laws of Kazakhstan. Access to such information by the Bank's employees is granted only as necessary and within the scope of the authorities defined in the Bank's internal regulatory documents.

48. Our employees:

- 1) process personal data with due care in accordance with the Bank's internal regulations and only for certain legitimate purposes;
- 2) ensure compliance with relevant contractual guarantees with third parties and service providers;
- 3) protect the information as well as physical and electronic assets to which they have access. This includes protecting them against 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 maintain the confidentiality of information do not cease when we terminate our operations.

51. We never carry out transactions based on insider information learned in the course of our work with the Bank, nor do we improperly disclose such information. Our Bank ensures compliance with the norms of the legislation of the Republic of Kazakhstan and foreign legislation regulating the use of insider information, as well as enhancing business reputation, maintaining a high degree of corporate governance, ensuring stability of Halyk Group. The list of insider information, procedure of monitoring management and use of insider information of the Bank, the Bank's subsidiaries and other legal entities, in respect of which the Bank is recognized as an insider, procedure and terms of its disclosure, maintenance of the list of insiders, restrictions established for insiders can be found in the Rules for Internal Control on the Management and Use of Insider Information in Halyk Bank JSC.

Chapter 8. Social Responsibility.

§ 1. Environmental Protection

52. We aim to minimize direct and indirect impacts 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, and minimize the negative impact on the environment in the course of our operations and when making corporate decisions. The Bank complies with the statutory limits for adverse environmental impacts.

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

54. We continuously work to reduce the 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 projects.

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

§ 2. Charity and Sponsorship

56. We recognize our social responsibility to the community. One of the basic 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 the society as a whole. The Bank strives to make an active contribution to the development of the society and to tackling social issues in accordance with the Bank's internal documents.

The support of various socially oriented charitable and sponsorship projects at both national and regional levels is an integral part of Halyk Bank JSC's business. When implementing them, we primarily focus on creating value for the society as a whole.

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

57. The priority areas of our social activities are funding projects in healthcare, education, support for culture, arts, mass sports, professional sports and environmental protection.

Chapter 9. Final Provisions

§ 1. Reporting Actual and Potential Violations

58. The Bank maintains firm position of conducting business on the basis of ethical principles and standards in accordance with the laws governing banking activities. Therefore, the Bank conducts internal audits of all alleged violations of the legislation, this Code of Ethics and internal regulatory documents of the Bank that are relevant to the Bank and have come to our attention.

Employees of the Bank may, at any time, report actual or potential violations of the legislation, this Code of Ethics and internal regulatory documents, or potential unethical or improper business practices to their line manager or supervisor or to the Security Department, the Internal Security Division, the Compliance Control Department and the Human Resources Department. In addition, any third party who is not an employee of the Bank but is aware of the aforementioned violations may also report them to the above-mentioned services of the Bank.

59. Information can be reported:

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

In this case, in order to protect informants, the Bank ensures confidentiality and anonymity (where necessary) of the appeal within the current legislation of the Republic of Kazakhstan. The Bank prohibits prosecution of any person reasonably reporting an alleged violation of the legislation, this Code of Ethics and internal regulatory documents of the Bank or potentially unethical or improper business practices.

60. If an employee or a third party who has reported a violation believes that they have been subjected to harassment or an act of retaliation for reporting or intending to report an actual or potential violation, they must immediately inform any employee of the Internal Security Division.

§ 2. Training

61. To support our employees in doing their jobs properly in accordance with this Code, we provide training that explains its provisions in an easy-to-understand manner. Each employee receives an email notification when a course on ethics and business conduct is assigned.

§ 3. Amendment and Supplement to the Code of Ethics

62. The Code of Ethics is approved, amended and supplemented in accordance with well-established principles of international law, the laws of the Republic of Kazakhstan, by resolution of the Board of Directors based on the recommendation of the HR and Remuneration Committee (the "HR Committee") and request of the Management Board of the Bank.

63. Issues on improvement of ethical standards aimed at enhancing corporate culture at the Bank, including appropriate training of employees, shall be considered by the HR Committee, subject to preliminary recommendations to the Board of Directors of the Bank.

§ 4. Liability for Violation of the Code of Ethics

64. We expect all our employees to perform their duties in accordance with the Bank's objectives, values, this Code of Ethics, the Bank's internal regulatory documents and the laws of the Republic of Kazakhstan. In case of violation of the provisions of the Code of Ethics and internal regulatory documents of the Bank, the employees may be subjected to disciplinary measures in accordance with the laws of the Republic of Kazakhstan. In cases of violation of the legislation of the Republic of Kazakhstan, the employees shall be subject to civil and criminal liability.

65. The HR Department of the Bank monitors compliance with the Code of Ethics. Responsibility for compliance with the Code of Ethics shall be borne by the structural subdivisions in their relevant area, providing information to the HR Department for consolidated reporting to be considered by the HR Committee pursuant to Annexes 1 and 2 hereto at least 1 (once) per year.

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

Halyk Bank JSC Code of Ethics and Business Conduct Principles and Provisions Compliance Report (upon no violations)

No.	Principles and Provisions of the Code of Ethics and Business Conduct at Halyk Bank JSC	Compliance/ Non-compliance	Measures taken to implement the principles and provisions of the Code of Ethics and Business Conduct at Halyk Bank JSC

Annex 2
to the Code of Ethics and Business Conduct at Halyk Bank JSC

Halyk Bank JSC Code of Ethics and Business Conduct Principles and Provisions Compliance Report (if there are violations)

No.	Violation of the Code of Ethics and Business Conduct at Halyk Bank JSC recorded during the reporting period	Principle, clause violated	Detection method and date	Measures taken to resolve and prevent the violation