



**FREEDOM  
BANK**

**Human Rights, Diversity and Inclusion  
Policy at “Freedom Bank Kazakhstan”  
JSC**

# Chapter 1.

## General provisions

**The Policy on Human Rights, Diversity and Inclusion in “Freedom Bank Kazakhstan” JSC** (hereinafter referred to as the Policy) was developed in order to form the approach of “Freedom Bank Kazakhstan” JSC (hereinafter referred to as the Bank) to respect for human rights, diversity and inclusion.

**The Bank recognizes the principles set out in the following international standards and documents, as well as in accordance with the legislation of the Republic of Kazakhstan:**

**Universal Declaration of Human Rights;**

- **International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;**
- **Labor Code of the Republic of Kazakhstan.**

The purpose of this Policy is to describe the Bank's approach to ensuring respect for human rights at all stages of its activities and the application of diversity and inclusion in the workplace, aimed at creating a working environment in which all employees of the Bank, regardless of their origin or identity, feel valued and receive equal opportunities to succeed. The Bank strives to prevent adverse effects on human rights and eliminate the consequences of such effects, if they arise.

## **Chapter 1. General provisions**

It is recommended that the principles of this Policy be considered when developing other policies and procedures related to the relationship with employees, stakeholders, social issues and personnel management issues.

The Policy applies to relations between the Bank and stakeholders, including employees, customers, business partners, local communities and other persons affected by the Bank's activities.

**This Policy should be read in conjunction with the Code of Ethics and Business Conduct, as well as other Policies and procedures of the Bank related to its sustainable development.**

**This Policy applies to all employees of the Bank.**

**This Policy is a publicly available document defining the Bank's approach to human rights, diversity and inclusion.**

## Chapter 2. Concepts and abbreviations used

The following terms and abbreviations are used in this Policy:

- **Bank** – "Freedom Bank Kazakhstan" JSC;
- **IRD** – Internal regulatory documents of the Bank;
- **Gender** – A social aspect of the relationship between men and women, which manifests itself in all spheres of life;
- **Discrimination** – The unjustified infringement of individuals or groups based on certain characteristics;
- **Stakeholders** – Individuals, legal entities or groups of persons involved in the Bank's activities to varying degrees, who influence the results of the Bank's activities and/or are influenced by the Bank's decisions and actions;
- **Local community, Society** – The population living within a municipality, united by common interests in solving local issues, such as trade unions;
- **Diversity** – A social strategy for providing equal opportunities to all societal groups, regardless of gender, ethnicity, age, physical abilities, cultural background, or other characteristics;

## Chapter 2. Concepts and abbreviations used

- **The United Nations (UN)** – An international organization dedicated to maintaining and strengthening international peace and security, as well as fostering cooperation between states;
- **Inclusion** – A policy of providing equal opportunities and resources to individuals who might not otherwise receive them.;
- **Human rights** – rules that ensure the protection of the dignity and freedom of each individual;
- **Personal data** – Information related to a specific or identifiable personal data subject, recorded on electronic, paper and (or) other material media;
- **Equal rights** – Rights guaranteed by the State, enshrined in the Constitution and laws of the Republic of Kazakhstan, which are equal for men and women to exercise civil, political, economic, social, cultural and other rights;

## Chapter 2. Concepts and abbreviations used

- **Equal opportunities** – A system of measures and conditions necessary to achieve real equality of rights;
- **A Bank employee** – An individual who has an employment relationship with "Bank Freedom Kazakhstan" JSC;
- **Environmental, Social, and Corporate Governance (ESG)** – refers to the three central factors in assessing the sustainability and social impact of investments in a company or business.

Other concepts and abbreviations used in this Policy are used in accordance with the meaning fixed in the IRD, and in their absence in accordance with the meaning fixed in the legislation of the Republic of Kazakhstan or accepted in international banking practice.

## Chapter 3. Basic principles

The Bank recognizes the importance of protecting and respecting human rights, diversity and inclusion in its activities and interaction with customers, employees, business partners and society as a whole.

In carrying out its activities, **the Bank adheres to the basic principles of human rights, diversity and inclusion**, which are set out in the following paragraphs:

- **respect for human rights**, in an effort to respect and support human rights in all transactions and business relationships, including the prevention and elimination of any human rights violations within its operations;
- **ensuring equal opportunities for all employees and clients of the Bank**, regardless of race, gender, religion, nationality, age, disability, sexual orientation, identity or any other characteristic. The Bank opposes any form of discrimination and promotes a fair work environment and equitable relationships;
- **protection of workers' rights, guarantee of safe and fair working conditions, respect for the rights to association and collective bargaining;**
- **The Bank opposes all forms of child and forced labor;**

## Chapter 3. Basic principles

- **environmental responsibility**, taking into account environmental aspects in activities, including projects that do not violate the environmental rights of local communities;
- **stakeholder engagement**, dialogue with customers, Bank employees, communities and other stakeholders to ensure respect for human rights;
- complaint mechanism, **providing effective mechanisms for filing complaints** and ensuring fair treatment regarding human rights violations;
- **The Bank provides measures to protect confidential information, and prevent its loss, illegal use and dissemination of confidential information:** information related to trade secrets, bank secrecy and personal data;
- **The Bank provides accessible information to persons with disabilities about means to facilitate their mobility, devices and assistive technologies, as well as other forms of assistance to create comfortable and equal conditions.**



## Chapter 4.

# Obligations of the Bank towards the Bank's employees

The Bank's employee policy covers a wide range of aspects aimed at ensuring fair, safe and decent working conditions.

Key rights that the Bank undertakes to respect in relation to its employees:

- **Non-discrimination:** The Bank provides employees with an environment free from discrimination based on race, gender, age, religion, nationality, disability, orientation, marital status and/or other characteristics;
- **The right to diversity and inclusion:** The Bank ensures the creation of a work environment where all employees, regardless of their origin or identity, feel valued and receive equal opportunities to achieve success. The Bank should not be biased in the recruitment process, eliminating subjectivity in the evaluation and hiring of job candidates, allowing for fairer comparisons between them;
- **The right to decent pay:** The Bank provides decent wages, considering factors such as the region of work, employee experience and job responsibilities. Employees' salaries must be fair and comply with minimum wage legislation;
- **The right to safe and healthy working conditions:** The Bank provides a safe working environment, prevents work-related injuries and diseases, and complies with occupational safety standards;

## Chapter 4.

### Obligations of the Bank towards the Bank's employees

- **The right to freedom of association and collective bargaining:** Employees have the right to establish and/or conduct collective bargaining with an employer in accordance with the legislation of the Republic of Kazakhstan;
- **The right to rest and vacation:** During work shift, employees are entitled to a break of 1 (one) an hour for rest and eating, with a five-day workweek, Saturdays, Sundays, as well as days of holidays and other non-working days established by the legislation of the Republic of Kazakhstan are considered days off, with a shift working mode, breaks and rest days are set by the schedule of the Bank with a cumulative accounting of working hours. Employees are also provided with the main paid annual labor leave/additional paid annual labor leave in accordance with the Labor Code of the Republic of Kazakhstan;
- **The right to privacy and protection of personal data:** The Bank protects the personal data of its employees, uses them exclusively within the framework of the legislation of the Republic of Kazakhstan and with the consent of employees. The Bank respects each employee's right to privacy and complies with all current legal norms and requirements regarding data confidentiality;
- **The right to protection caused by unlawful deprivation of an employee's opportunity to work:** Termination of an employment contract with Bank employees is carried out in accordance with the labor legislation of the Republic of Kazakhstan and the Bank's IRD;

## Chapter 4.

### Obligations of the Bank towards the Bank's employees

- **The right to professional development and training:** Bank employees must have access to training and development opportunities to maintain and improve their professional skills. The Bank strives to create optimal conditions and invests in the training and development of employees, provided that the training will be effective and practical for achieving professional goals. Preserving and transferring knowledge within the Bank is a crucial factor in staff development;
- **The right to protection from harassment and violence:** The Bank condemns all forms of violence and harassment in the workplace, including threats of violence, sexual or racial harassment, bullying, verbal abuse;
- **Child labor:** The Bank strictly complies with the requirements and restrictions provided for by national and international labor law, including the prohibition against employing minors in work that may harm their health and moral development.
- **Compliance with these rights contributes to the creation of a fair, ethical and productive work environment, which in turn increases employee satisfaction, reduces staff turnover and improves the overall reputation of the Bank.**

## Chapter 4.

# Obligations of the Bank towards the Bank's employees

The Bank's human rights obligations towards its clients and business partners include the following key aspects:

- **Responsible partnership:** The Bank should select business partners and counterparties who share their commitment to respect for human rights. This includes assessing the risks of human rights violations within the supply chain and when concluding business agreements.
- **Compliance with international standards:** The Bank takes into account international standards such as the UN Universal Declaration of Human Rights in its activities and expects the same from its partners.
- **Due diligence:** The Bank has the right to inspect its partners in order to identify and prevent risks of human rights violations.
- **Complaint mechanisms:** Providing a mechanism for complaints via email to [salem@freedombank.kz](mailto:salem@freedombank.kz) in case of detection of human rights violations by clients or partners.
- **Transparency and accountability:** Publishing an annual non-financial Sustainability Report, which includes human rights aspects of the Bank's activities, including information on audits conducted and measures taken to address identified human rights violations.
- **Ethics and Respect:** Doing business with high ethical standards and respect for local customs and culture and Society in general.

## Chapter 6.

# Obligations of the Bank towards the Company

The Bank's human rights obligations to local communities include the following key aspects:

- **Respect for the rights of local communities and Society as a whole:** The Bank respects the rights of local communities, including rights to land, resources and cultural heritage. This is especially important when implementing large-scale projects, such as the construction of infrastructure or natural resource development; the Bank respects and focuses on the fair, transparent, honest approach, not welcoming any actions that violate human rights.
- **Social investments and development:** The Bank undertakes to invest in the social and economic development of the Society. This may include job creation, support for education and healthcare, and other initiatives aimed at improving the quality of life.

## Chapter 7. Reporting Internal Policy Violations

The Bank has developed a mechanism for filing, reviewing appeals and complaints from internal stakeholders, through which everyone can report their concerns about human rights violations.

Employees of the Bank who have become aware or who have reason to believe that the principles and rules of this Policy or the requirements of applicable legislation are being violated should inform the ESG Division of the Department of Financial Risks via email [esg\\_mgt@bankffin.kz](mailto:esg_mgt@bankffin.kz).

**The Bank prohibits any form of harassment (measures of influence) against individuals covered by this Policy, who in good faith reported a violation, assisted in conducting investigations, refused to participate in activities contrary to the principles or requirements of the Policy.**

Any Person to whom the Policy applies and **who violates its requirements may face disciplinary actions up to and including termination of contracts** in accordance with the provisions of these agreements and current legislation.

**All appeals are subject to review, investigation and measures to resolve the situation if necessary.**

## **Chapter 8.**

### **The mechanism of implementation of the principles and approaches of the Policy**

To ensure compliance with the Policy, it is necessary to constantly monitor the level of awareness and evaluate the effectiveness of the measures taken.

The main objectives of monitoring and evaluation are:

- to assess the current level of awareness among the Bank's employees and stakeholders about human rights;
- analysis of the effectiveness of existing human rights policies and procedures;
- develop recommendations for Policy improvement.

**The ESG Division of the Department of Financial Risk organizes mandatory familiarization and regular training for employees regarding the Policy, its principles and approaches.**

## **Chapter 8.**

### **The mechanism of implementation of the principles and approaches of the Policy**

**The ESG Division of the Department of Financial Risks is responsible for effective monitoring and assessment of human rights awareness.** The main responsibilities of the ESG Division under this Policy include:

- **organizing and conducting questionnaires/surveys among the Bank's employees**, conducted at least twice a year to identify the level of awareness and understanding of the Policy;
- **The selective conduct of stakeholder surveys** to identify the level of awareness and understanding of the Policy is not a mandatory process, carried out at the discretion of the ESG Management, it is a systematically organized and targeted practice;
- **record keeping and analysis of incidents.**

Effective monitoring and awareness assessment of these Policies are key elements to ensure their compliance and to improve the Bank's principles and approaches in the field of human rights. Regular implementation of these events contributes to the creation of a fairer and safer working environment for all employees of the Bank.



## **Chapter 9. Responsibility**

**All employees of the Bank must strictly comply with the provisions of this Policy and are responsible for any violation in accordance with the legislation of the Republic of Kazakhstan and the Bank's IRD procedures.**

**The Bank's employees are responsible for any improper or illegal actions committed during the performance of their official duties.**

**Non-fulfillment/improper fulfillment of the requirements of this Policy is considered as non-fulfillment/improper fulfillment by employees of the Bank of their official or other duties** with the possible bringing of guilty persons to disciplinary or other liability in accordance with the procedure provided for by the labor legislation of the Republic of Kazakhstan and the Bank's IRD procedures.

## **Chapter 10. Final provisions**

This Policy will be reviewed for relevance and compliance with applicable standards and practices as necessary.

**In all matters not reflected in this Policy, the Bank is guided by the legislation of the Republic of Kazakhstan and the Bank's IRD procedures.**