



**FREEDOM  
BANK**

**Code of responsible supplier of  
goods, works and services  
«Freedom Bank Kazakhstan» JSC**

## **Chapter 1. General provisions**

**The Code of the responsible supplier of goods, works and services of «Freedom Bank Kazakhstan» JSC** (hereinafter referred to as the Code) contains a set of principles expected to be observed by Suppliers of goods, works and services of the Bank.

The purpose of this Code is to ensure that Suppliers are aware of the core values and standards of conduct that the Bank expects them to observe when providing goods, works and services to the Bank.

**This Code has been developed in accordance with the generally recognized principles and norms of international law, the legislation of the Republic of Kazakhstan and the Bank’s Internal Regulatory Documents.**

## **Chapter 2. Concepts and abbreviations used**

4. The following concepts and abbreviations are used in this Code:

- **Bank – «Freedom Bank Kazakhstan» JSC;**
- **Supplier – any third-party providing goods, works and services to the Bank;**
- **IRD – internal regulatory documents of the Bank.**

## **Chapter 3.**

# **Basic principles and rules of business conduct of the Bank**

The Bank considers honest and responsible cooperation with Suppliers as an important element for achieving the Bank's strategic goals and improving the quality of customer service and strives to build relationships with Suppliers based on trust, as well as similar ethical, social and environmental values and principles.

**The Bank's values can be found on the Bank's official website.**

When providing goods, works and services to the Bank, Suppliers are expected to do the following:

- **familiarize themselves with the provisions of this Code** and take it into account in your daily work, avoid inappropriate behavior;
- provide goods, works and services to the Bank, **guided by high ethical standards**, as well as the requirements of the legislation of the Republic of Kazakhstan;
- **make efforts to conserve resources (assets) Of the Bank** (including, but not limited to: property, money, intellectual property, reputation, rights, information and its sources, documentation, means and channels of communication, software, etc.), use them effectively and carefully, **do not use them for personal enrichment**, benefits or any other activities not related to the Bank;
- **avoid manipulation, concealment of confidential information, distortion of facts or any other unfair business practices.**

## Chapter 4. Legal and regulatory requirements

The Bank always requires its Suppliers to **fully comply with all applicable laws and regulations in the countries in which they operate**. Suppliers are expected to comply with the requirements of the current legislation of the Republic of Kazakhstan and international standards. This includes measures related to conflicts of interest, corruption and laundering of proceeds from crime, and the financing of terrorism.

Suppliers are expected to understand the impact of conflicts of interest on the business reputation and other adverse consequences for the Bank and/or its Customers, as well as a **reasonable approach to resolving conflicts of interest** based on reducing the Bank's legal and reputational risk.

Suppliers are advised to **avoid any statements that undermine the reputation of the professional activities of the Bank's competitors** and to discourage such statements from third parties.

**The Bank adheres to the principle of «zero tolerance» for corruption**, which means non-acceptance of corruption in any form and manifestations. The Bank requires Suppliers to **prevent corruption and other illegal actions** in order to obtain or maintain unjustified benefits and advantages.

## Chapter 4. Legal and regulatory requirements

Suppliers are expected to **prevent operations related to the legalization (laundering) of proceeds from crime, the financing of terrorism and the prevention of the proliferation of weapons of mass destruction and their financing, as well as compliance with international and national economic sanctions.**

Suppliers are **expected to inform the Bank about committed, ongoing or planned illegal actions inside or outside the Bank,** committed by employees, Customers, business partners or other Suppliers of the Bank.

The Bank **takes measures to protect confidential information,** preventing its loss, illegal use and dissemination (including commercial and banking secrets, as well as personal data), and expects the same from Suppliers.

Suppliers are expected **to be particularly careful and responsible when handling confidential information,** including personal data, in accordance with the legislation of the Republic of Kazakhstan and to take the necessary measures to protect such information.

The Bank ensures its employees and expects Suppliers **not to harass or retaliate against employees who have reported known violations in good faith,** and to respect the rights of employees against whom complaints have been received.

## Chapter 5. Human rights

The Bank strives to adhere to the principle of equal opportunities for all employees in its business practices and procedures and expects the same approach from its Suppliers.

Suppliers are expected to respect human rights, including:

- the desire to **provide their employees with equal opportunities** for development and training, recognition of freedom of speech, association and collective bargaining;
- striving to **create a safe and inclusive work environment** in which employees have equal opportunities regardless of gender, race, or identity of employees;
- ensuring the performance of work **without the use of forced and child labor**;
- **failure to take advantage of the vulnerability of workers**;

## Chapter 5. Human rights

- **providing all employees with fair salary, standardized working hours, the opportunity to take advantage of work leave, as well as protection from unfair dismissal** in accordance with the requirements of the current legislation of the Republic of Kazakhstan and the Labor Code of the Republic of Kazakhstan;
- **to ensure safe and comfortable working conditions for the Supplier's employees**, in accordance with the requirements of the current legislation of the Republic of Kazakhstan and the Labor Code of the Republic of Kazakhstan, as well as to make efforts to reduce the risk of accidents and injuries;
- **non-discrimination** based on gender, age, race, political, religious and other grounds;
- the desire to **avoid any form of violence and harassment in the workplace**, including threats of violence, sexual harassment, bullying, verbal abuse and unjustified disciplinary action;
- **abstaining from any actions that allow or encourage the creation of conflict situations**, aggression, threats, violence and other illegal actions. In cases of disagreement, make all reasonable efforts to resolve them peacefully.

## Chapter 6. Environment

**One of the Bank's values is «striving for sustainable development».** The Bank strives to consider the long-term consequences of its activities and generate sustainable value for Customers, employees, investors and society. This means that the Bank considers and evaluates the direct and indirect economic aspects and the environmental impacts of business decisions. The Bank strives to increase the positive impact of its business decisions and support the sustainable future of society and the environment.

Suppliers are expected to ensure that the **materials used to provide goods, works and services to the Bank are obtained legally** and with the intention, if possible, to use sustainable sources, that is, without negative impact on the environment.

If the Bank finds that there is a negative impact on the environment and climate during the implementation of Suppliers' activities, **the Bank has the right to request information from Suppliers on the environmental impact throughout the supply chain.**

**The Bank welcomes the adoption of measures to reduce the negative impact on the environment,** including reducing the amount of paper used in operational activities and, where possible, switching to electronic document management.



## Chapter 6. Environment

The Bank expects Suppliers to:

- **compliance of its activities with all applicable environmental laws**, including laws and international treaties related, inter alia, to climate change, waste disposal, emissions, discharges and handling of hazardous and toxic materials;
- compliance of the goods they produce (including raw materials and components included in their products) with all applicable environmental laws and contracts;
- using only those packaging materials that comply with all applicable environmental laws and agreements;
- **availability of all necessary permits for the use and disposal of waste and water**. All waste, wastewater, or emissions that may negatively affect human health or the environment are properly managed, monitored, and treated before they are released into the environment;
- the materials provided to the Bank are obtained from legitimate sources and in accordance with the legislation of the Republic of Kazakhstan and international laws concerning the import of goods that do not contain materials obtained as a result of illegal deforestation.

## Chapter 7. Corporate Social Responsibility

The Bank strives to improve the social and economic living conditions of people in the countries in which it operates. The Bank encourages Suppliers to make similar commitments both at the corporate level and in relation to their employees, and to interact with local charities and/or communities within the framework of current legislation.

## Chapter 8. Publicity and interaction with the media

Suppliers are expected to refrain from any actions (omissions) that allow or encourage the occurrence of situations that may lead to damage to the business reputation, image, other intangible or material interests of the Bank, as well as obtaining personal enrichment and other benefits as a result of unethical behavior.

Suppliers are expected to understand that any of their actions (inaction) may be published (made public), which may lead to a negative impact on the Bank's reputation.

The Bank expects Suppliers to receive and use all information obtained during the Bank's interaction lawfully and in accordance with all applicable laws and regulations.

Suppliers **must not disclose to the Bank any non-public information about competitors** obtained illegally and unethically. Similarly, the Bank's confidential information should not be shared with third parties, including the media, unless it has been discussed with the Bank.

## Chapter 9. Control

If necessary, **the Bank may conduct due diligence on Suppliers** as part of its active monitoring of its relationships and ongoing engagement with Suppliers.

The Bank reserves **the right to ensure the implementation and compliance with the Code through periodic inspections.**

If cases of non-compliance with the Code are found, the Bank may take appropriate measures. Cases of non-compliance with this Code of Conduct can be reported by writing to **[esg\\_mgt@freedombank.kz](mailto:esg_mgt@freedombank.kz)**.

## Chapter 10. Final provisions

**The Bank expects Suppliers to familiarize themselves with and comply with this Code, including its Employees and Subcontractors.**

The provisions of the Code will be included in the supply contracts, and each provision of this Code will be considered an essential condition of any agreement with the Supplier.

The Bank **recommends that Suppliers implement the requirements of this Code** in their internal corporate policies and procedures necessary for effective compliance with the values and principles set out in this Code.

The Bank expects **Suppliers to notify Subcontractors of this Code** and to make reasonable efforts to include equivalent provisions in contracts with these Subcontractors.

Suppliers must carry out an appropriate comprehensive review of potential Subcontractors who will fulfill their obligations by the Bank, including in relation to the areas covered by this Code.

**Failure by Suppliers or their Subcontractors to comply with the provisions set out in this Code will mean a reduction in opportunities for cooperation with the Bank.**