

Code of Business Ethics of Eldik Bank OJSC
Table of contents

1. General Provisions.....	0
2. Terms and Definitions Used in the Code.....	0
3. Scope of the Code.....	1
4. Responsible Banking	1
5. Respect for Human Rights.....	3
6. Participation in Political Activities.....	4
7. Confidential and Insider Information	5
8. Protection of Personal Data	5
9. Occupational Safety and Health	6
10. Approaches of the Bank to Sustainable Development	7
11. Compliance with the Code and Liability for Violations.....	7
12. Reporting Violations.....	8
13. Final Provisions.....	8
Appendix No. 1.....	9

1. General Provisions

- 1.1. Code of Business Ethics of Eldik Bank OJSC (hereinafter referred to as the Code) sets out basic norms and requirements for ethical business conduct and corporate culture of Eldik Bank OJSC (hereinafter referred to as the Bank).
- 1.2. The Code is developed for the purposes of:
 - demonstration of the commitment of the Bank to high ethical standards of conducting open and honest business, and following the best practices of corporate governance.
 - development of a unified corporate culture in the Bank;
 - maintaining an atmosphere of trust, mutual respect and integrity in the workforce and in relations with stakeholders of the Bank;
 - enhancing, strengthening and protecting the business reputation of the Bank as a bona fide company and partner.
- 1.3. Certain provisions of the Code and the procedure for their implementation are disclosed in more detail in the stand-alone internal documents of the Bank, including codes, policies, regulations, and job descriptions.
- 1.4. The Code is published on the official website of the Bank for free access of stakeholders of the Bank.

2. Terms and Definitions Used in the Code

- 1) Bank employee – employee of the head office, as well as branches, structural units, representative offices of the Bank, who work based on an employment contract concluded with the Bank.
- 2) Business ethics – set of ethical principles, values and norms of business conduct and commitments that the Bank and its employees are guided by in their activities.
- 3) Confidential information – information in respect of which the applicable legislation and internal documents of the Bank establish a regime of confidentiality.
- 4) Counterparty – any legal entity, individual entrepreneur with whom the Bank enters into contractual relations, or any individual with whom the Bank enters into contractual relations, with the exception of labor relations.

- 5) Discrimination – any illegal restriction or infringement of human rights and freedoms based on individual characteristics, as well as provision of any advantages depending on circumstances not related to the business qualities of the employee.
- 6) ESG – sustainable development factors that are taken into account by the Bank in carrying out its activities, namely environmental factors, including climate factors, social factors and governance factors.
- 7) Insider information – reliable information about securities (derivative financial instruments), transactions with them, as well as about an issuer that issued (provided) securities (derivative financial instruments), activities carried out by it, constituting a commercial secret, as well as other information unknown to third parties, disclosure of which may affect the change in the value of securities (derivative financial instruments), market interest in them, as well as activities of their issuer.
- 8) Human rights – inalienable rights of every person, based on recognition of the inherent dignity of a human person, as well as the freedom and equality of all people.
- 9) Personal information (personal data) – information recorded on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing this person to be identified directly or indirectly by reference to one or more factors specific to his biological, economic, cultural, civil or social identity.
- 10) Responsible banking – the Bank’s systematic consideration of the United Nations Sustainable Development Goals, social and environmental aspects in decision-making and strategic planning, the Bank’s promotion of ethical and sustainable approaches to effectively respond to strategic and long-term economic, environmental and social challenges and problems, the Bank’s implementation of advanced corporate governance and risk management practices, as well as the Bank’s positioning of the long-term well-being of its stakeholders and taking into account their interests as a more significant value compared to short-term corporate financial performance.
- 11) Stakeholders – individuals and legal entities, as well as groups of such individuals, that are involved to varying degrees in interactions with the Bank that influence the Bank’s activities and/or are influenced in their decisions and activities by the Bank.
- 12) Sustainable development – development in which the Bank manages the impact of its activities on the environment, economy, society, and makes decisions taking into account the interests of stakeholders. Sustainable development should meet the needs of the present without compromising the ability of future generations to meet their own needs.
- 13) United Nations Sustainable Development Goals – global development goals defined in the Declaration “Transforming our world: the 2030 Agenda for Sustainable Development” that was adopted by the United Nations General Assembly Resolution No. 70/1 on 25 September 2015.

3. Scope of the Code

- 3.1. The Code applies to all employees of the Bank, regardless of their position and tenure at the Bank.
- 3.2. The provisions of the Code are recommended for implementation and compliance among subsidiaries of the Bank.
- 3.3. The Bank welcomes efforts of counterparties of the Bank to comply with the requirements set out in the Code.
- 3.4. The provisions of the Code apply to counterparties of the Bank, including suppliers, agents, consultants, representatives and other persons and entities, in cases where the relevant obligations are set out in agreements with them or directly follow from applicable legislation.

4. Responsible Banking

- 4.1. The Bank aims to build a competitive business that meets the principles of social and environmental responsibility, contributing to the sustainable development of the Kyrgyz Republic in the long term.
- 4.2. The Bank strives to strictly and fully comply with the requirements of the legislation of the Kyrgyz Republic related to and applicable to the activities of the Bank.
- 4.3. The Bank is guided by the principle of compliance with contractual and other obligations that arise from or are conditioned by business relations.

- 4.4. The Bank views the United Nations Sustainable Development Goals and the principles of the United Nations Global Compact as strategic priorities and is focused on implementing ESG in its own operations.
- 4.5. The Bank guarantees that the rights and legitimate interests of the shareholder will not be infringed, including striving for transparency in the work of governance bodies of the Bank, creating conditions for unhindered access of the shareholder to information about activities of the Bank in a manner prescribed by the legislation of the Kyrgyz Republic and the internal documents of the Bank.
- 4.6. The Bank is committed to rejecting corruption in any form or manifestation, and to refusing to participate in unethical, illegal or unfair practices.
- 4.7. The Bank ensures compliance of its activities with the requirements of the legislation of the Kyrgyz Republic on combating the legalization of proceeds from crime.
- 4.8. The Bank operates in accordance with the tax legislation of the Kyrgyz Republic and international treaties on taxation issues to which the Kyrgyz Republic is a party, and also maintains a reputation as a conscientious taxpayer.
- 4.9. The Bank does not support the practice of tax evasion, in particular not interacting with tax jurisdictions that do not cooperate with the authorized tax authorities of the Kyrgyz Republic, and does not use international offshore schemes and states with preferential tax regimes (“tax havens”) for the purpose of tax optimization.
- 4.10. The Bank fully and promptly complies with the requirements of state authorities based on the norms of the legislation of the Kyrgyz Republic, and does not allow the use of illegal methods or instruments of influence on the decisions of state bodies.
- 4.11. The Bank guarantees compliance of financial products and services of the Bank with the requirements of the legislation of the Kyrgyz Republic.
- 4.12. The Bank is focused on continuously improving the efficiency of the corporate risk management system, including through the integration of assessment and management of significant sustainable development risks into the risk management system.
- 4.13. The Bank ensures compliance with the “three lines of defense” model, including the organizational independence of the Bank’s structural divisions that perform risk management functions from the divisions that perform functions related to risk acceptance.
- 4.14. The Bank does not allow the provision of unapproved or undeveloped financial products and services from a risk perspective to clients and other stakeholders of the Bank.
- 4.15. The Bank and the Bank employees demonstrate integrity, tact, and respect for all persons and entities interacting with the Bank, and act openly and honestly.
- 4.16. The Bank strives to ensure the availability and quality of financial products and services provided, including to stimulate financial inclusion.
- 4.17. The Bank strives to meet high standards of client service and provide services at a high professional level. Bank employees are required to promptly respond to clients’ requests and are personally responsible for the results of their interaction with clients, provide comprehensive advice that does not mislead clients, and inform clients of possible risks.
- 4.18. When establishing and maintaining business relationships with clients, the Bank adheres to the “Know Your Client” principle to comply with the legislation of the Kyrgyz Republic, reduce its overall exposure to risks, and minimize the likelihood of involvement in illegal activities.
- 4.19. The Bank respects the needs of employees, clients and other stakeholders of the Bank with disabilities, strives to create a barrier-free environment and improve their ability to use the Bank's financial products and services, including by ensuring the accessibility of the branches and offices of the Bank and implementation of digital solutions, including mobile applications of the Bank.
- 4.20. The Bank does not provide clients and counterparties of the Bank with benefits and privileges that are unreasonable or prohibited by the legislation of the Kyrgyz Republic.
- 4.21. The Bank determines a list of activities that are not financed by the Bank when considering loan applications from clients, because these activities may have a negative environmental and/or social impact.

- 4.22. The Bank strives to build long-term and mutually beneficial relationships with its counterparties, while reserving the right to refuse cooperation with counterparties that are involved in corruption and other activities that violate the requirements of the legislation of the Kyrgyz Republic.
- 4.23. The Bank strives to ensure transparency in the procurement process of goods, works and services, as well as equality, fairness, absence of discrimination and unreasonable restrictions of competition in relation to suppliers.
- 4.24. The Bank supports free competition and strives to build relationships with competitors based on the principle of mutual respect, refrains from unfair competition, unethical methods of obtaining competitive advantages and abuse of position, and focuses on resolving potential disagreements through good faith negotiations and mutually beneficial solutions.
- 4.25. The Bank ensures compliance with the requirements of the antimonopoly legislation of the Kyrgyz Republic in its activities.
- 4.26. The Bank ensures the reliability and accuracy of its management, accounting (financial) and non-financial reporting, in particular the reliability of any documents on the basis of which the above reporting is formed.

5. Respect for Human Rights

- 5.1. The Bank recognizes the inviolability of the rights of every person, respects their dignity, and promotes an inclusive and diverse work environment in which all Bank employees are treated fairly and in a partnership of honesty and dignity.
- 5.2. The Bank ensures compliance with the provisions of the human rights legislation of the Kyrgyz Republic, as well as compliance with the provisions of the following international documents and initiatives, among other things:
 - Universal Declaration of Human Rights.
 - International Covenant on Economic, Social and Cultural Rights.
 - Declaration of the International Labor Organization on Fundamental Principles and Rights at Work.
 - United Nations Guiding Principles on Business and Human Rights.
 - United Nations Global Compact.
- 5.3. The Bank seeks to avoid causing or contributing to adverse human rights impacts through its activities and to address such impacts when they occur.
- 5.4. The Bank prohibits discrimination against Bank employees and other stakeholders based on any individual characteristics, including gender, age, religion, political views, nationality, or health status.
- 5.5. Bank employees are required to show respect for cultures, opinions and ways of life that differ from their own and to be mindful of how others will perceive them and react to their behavior and communication. Bank employees are prohibited from engaging in or tolerating any conduct that could contribute to an intimidating, hostile, offensive or demeaning workplace environment.
- 5.6. The Bank respects the right of the Bank's employees to collective bargaining and participation in trade union activities.
- 5.7. The Bank respects the rights of the Bank's employees to freedom of assembly and association, freedom of opinion and expression.
- 5.8. The Bank respects the civil rights of the Bank's employees and recognizes their right to participate in political activities as private individuals.
- 5.9. The Bank recognizes the labor rights of the Bank's employees as an integral part of human rights. In its activities, the Bank observes the labor rights of employees established by law, in particular recognizing the right of the Bank employees to decent remuneration for the results of their work.
- 5.10. The Bank is focused on creating a working environment that ensures equal opportunities and freedom from discrimination on any grounds in all aspects of labor relations, as well as on the basis of other circumstances not related to business qualities, except in cases where the nature of the selection of individual employees of the Bank is determined by the current labor or other legislation of the Kyrgyz Republic.
- 5.11. The Bank categorically does not tolerate any manifestation of physical, verbal, sexual or psychological pressure, or harassment, aggression, abuse or threats in the workforce.

- 5.12. The Bank strives to ensure a decent level of remuneration for the Bank employees and determines the amount of remuneration for members of the management bodies and employees of the Bank based on objective factors that are related to the effectiveness of the performance of official duties and regardless of any discriminatory distinguishing features.
- 5.13. The Bank strives to ensure equal pay for men and women performing the same job responsibilities, adhering to the principle of equal pay for equal work regardless of gender or other discriminatory factors.
- 5.14. The Bank guarantees social protection and support to the Bank employees within the framework provided for by the legislation of the Kyrgyz Republic and the internal documents of the Bank.
- 5.15. The Bank adheres to the requirements of the legislation of the Kyrgyz Republic regarding working hours, overtime work, compensation, and paid annual leave.
- 5.16. The Bank initiates and implements personnel development programs, including those aimed at training and professional development of the Bank's employees.
- 5.17. The Bank strives to ensure that Bank employees have the right to receive and provide regular feedback, including through personal meetings with top managers.
- 5.18. The Bank recognizes the need of each Bank employee to achieve a balance between the personal and professional aspects of life, and respects the right to privacy. For this reason, Bank employees may provide only the personal information that is related to the performance of work activities or required by the legislation of the Kyrgyz Republic.
- 5.19. The Bank does not use child labor. The minimum age of Bank employees corresponds to the minimum legal age for concluding an employment contract.
- 5.20. The Bank does not accept the use of forced labor and modern forms of slavery. Any involuntary work under threat of any punishment is unacceptable.
- 5.21. The Bank is categorically against human trafficking and undertakes to inform law enforcement agencies of known cases of this type of illegal activity.
- 5.22. The Bank recognizes the importance of regularly identifying and assessing potential human rights impacts of activities of the Bank, including with a view to taking timely action before adverse effects occur.
- 5.23. In the event of identification of risks and/or occurrence of human rights violations, the Bank takes measures to eliminate negative consequences, as well as measures to improve practices for ensuring the protection of human rights.
- 5.24. The Bank takes a negative view of human rights violations in the value chain and expects suppliers, contractors and other counterparties with whom the Bank interacts to comply with the legislation of the Kyrgyz Republic and international human rights standards.
- 5.25. The Bank reserves the right to request information from the Bank's counterparties regarding their observance of human rights, non-discrimination of employees, the use of forced and child labor, and other issues related to human rights.
- 5.26. The Bank declares its possible refusal to cooperate with counterparties that violate fundamental human rights, allow discrimination and forced labor against their employees and other stakeholders.

6. Participation in Political Activities

- 6.1. The Bank does not participate directly or indirectly in political activities, including participation in political organizations (political parties, movements, etc.), related organizations and foundations, making sponsorship, charitable and other financial payments in favor of political parties and movements, related organizations and foundations, politically significant persons.
- 6.2. Campaigning in favor of any political organizations, as well as dissemination of political or religious views and beliefs by Bank employees, is not permitted on the Bank's premises.
- 6.3. The political views of the Bank employees and their participation in political activities should not influence the performance of their work duties or create a conflict of interest.
- 6.4. The Bank prohibits Bank employees from receiving political and religious donations on behalf of the Bank, as well as directly or through intermediaries promising, offering or transferring to representatives of government bodies and political organizations payments for simplification of formalities, cash and any other valuables, loans, services, payment for entertainment, recreation, transportation expenses and other remuneration, making gifts to them in connection with their official position or in connection with the

performance of their official duties, including in exchange for or with the purpose of obtaining undue advantages or preferences for the Bank or for Bank employees.

- 6.5. An exception is reasonable and justified expenses related to the participation of representatives of government bodies and political organizations in official events organized or financed by the Bank, provided that such expenses are not made in exchange for or with the purpose of obtaining undue advantages or preferences for the Bank or for the Bank employees.

7. Confidential and Insider Information

- 7.1. Bank employees are required to assume that any information received by them in connection with the performance of their work duties is confidential and is not subject to disclosure unless the Bank expressly notifies the public availability of such information or publishes it.
- 7.2. Bank employees are prohibited from transferring confidential and insider information, information constituting a commercial secret of the Bank or counterparties of the Bank to any third parties, except in cases where the transfer of such information is authorized by the management of the Bank and is carried out based on the requirements of the legislation of the Kyrgyz Republic.
- 7.3. Bank employees, whose status does not allow them to access confidential and insider information of the Bank, who for any reason become aware of information related to confidential and insider information, are obliged to take measures to maintain the confidentiality of such information, including excluding the dissemination or provision of such information to third parties, and also to notify the head of the structural unit where they work and the compliance control division of that fact.
- 7.4. Bank employees are obliged to strictly comply with all procedures and regulations in force in the Bank for the receipt, storage and use of confidential information. Bank employees are obliged to prevent any unauthorized access to confidential information and to immediately report cases of unfair provision, receipt, abuse of confidential information or cases of other improper use of such information.
- 7.5. The Bank strives to encourage Bank employees who discover and conscientiously report vulnerabilities in the system for protecting confidential information from unauthorized access that they have identified.
- 7.6. The Bank strives to ensure prompt response to any threats or realized incidents of confidential information leakage and continuous improvement of its protection systems.
- 7.7. Bank employees are strictly prohibited from using the Bank's information technology, internal communications systems, equipment or communication facilities for illegal or immoral activities or purposes, committing cybercrimes, participating in gambling or conducting their own business activities.
- 7.8. The Bank ensures the confidentiality of insider information and data obtained during negotiations and transactions.
- 7.9. Bank employees who have access to insider information by virtue of their job responsibilities are prohibited from using insider information, in particular in the following cases:
- carry out operations or transactions with financial instruments that involve insider information;
 - recommend to third parties to carry out operations or transactions with financial instruments.
- 7.10. To provide shareholder and other stakeholders with free and equal access to information, the Bank organizes timely and reliable public disclosure of insider information in accordance with the requirements of the legislation of the Kyrgyz Republic.
- 7.11. The Bank reserves the right to initiate the bringing of an employee of the Bank or another person who has become aware of the confidential information of the Bank to administrative, criminal or other liability for disclosure of confidential information not authorized in the manner established by the legislation of the Kyrgyz Republic and the Bank, that actually caused or is capable of potentially causing damage to the Bank, shareholder, clients, counterparties of the Bank, other employees of the Bank and other stakeholders.
- 7.12. Employees, counterparties and other stakeholders of the Bank have the right to inform the Bank about the fact of unlawful distribution, disclosure or use of confidential and insider information.

8. Protection of Personal Data

- 8.1. The Bank respects confidentiality and the right of its employees, individual clients and other stakeholders to privacy.

- 8.2. The Bank ensures the protection and processing of personal data, including in electronic (digital) form, in compliance with the requirements of the legislation of the Kyrgyz Republic and the internal documents of the Bank in the personal data area.
- 8.3. The processing of personal data is carried out by the Bank only with the personal consent of subjects of personal data to the processing of the personal data. Subjects of personal data independently make a decision to provide their personal data and gives consent freely, of their own free will and in their own interests.
- 8.4. The Bank ensures the confidentiality of information, except in cases determined by the legislation of the Kyrgyz Republic, about the subjects of personal data, and also collects, uses and stores personal data for legal purposes and within reasonable limits necessary for activities of the Bank.
- 8.5. As the holder (owner) of personal data, the Bank informs subjects of personal information about the rights concerning their personal data, and also familiarizes subjects of personal information with the list of data collected, grounds and purposes of their collection and use, with the possible transfer of personal data to a third party, and also informs about other possible uses of personal data.
- 8.6. The Bank respects the right of subjects of personal information to know whether the Bank has access to such data as the holder (owner) of personal data relating to them.
- 8.7. The Bank does not disclose personal data of subjects of personal information to third parties and does not distribute personal data without the consent of subjects of personal data, unless otherwise provided by the legislation of the Kyrgyz Republic.
- 8.8. Except in cases established by the legislation of the Kyrgyz Republic, the Bank does not process personal data related to such special categories as racial or ethnic origin, nationality, political views, religious or philosophical beliefs, as well as those related to health status and sexual inclinations, solely for the purpose of identifying these categories.
- 8.9. Subjects of personal data have the right to revoke consent to the processing of their personal data. If a subject of personal information revokes consent to the processing of personal data in the absence of other legal grounds for their processing, the Bank shall terminate the processing and destroy the personal data within the timeframes established by the legislation of the Kyrgyz Republic.
- 8.10. The Bank strives to implement sufficient organizational and technical measures to protect personal data from unauthorized, accidental or illegal destruction, loss, alteration, unfair use, disclosure or access, as well as other illegal forms of processing and use.
- 8.11. Bank employees found guilty of violating the requirements for the processing and protection of personal data shall bear material, disciplinary, administrative and other liability in accordance with the procedure established by the legislation of the Kyrgyz Republic and the internal documents of the Bank.

9. Occupational Safety and Health

- 9.1. The Bank strives to provide Bank employees with healthy and safe working conditions in the workplace, recognizing the right of Bank employees to a safe workplace.
- 9.2. Bank employees are required to follow occupational safety and health regulations and rules of the Bank. In cases where the relevant obligations are stipulated in contracts with them or directly follow from applicable legislation or business interactions, suppliers, agents, consultants, representatives and other persons are also required to follow the relevant occupational safety and health regulations and rules of the Bank.
- 9.3. The Bank has the right to apply disciplinary measures against Bank employees in accordance with the legislation of the Kyrgyz Republic and the internal documents of the Bank in the event of failure by Bank employees to comply with occupational safety and health procedures, regulations and instructions of the Bank.
- 9.4. In the event of a situation that poses a danger to health and safety, Bank employees are required to immediately report it to their immediate supervisor.
- 9.5. Bank employees have the right to refuse work if their life and health are threatened by a reasonable danger due to a violation of occupational health and safety requirements.
- 9.6. The Bank seeks to consult with Bank employees and supports the involvement of Bank employees in the process of preventive identification of risks and hazardous factors associated with the performance of

work duties. Bank employees have the right to make reasonable proposals for the development, implementation and assessment of the occupational safety and health management system.

- 9.7. The Bank conducts annual internal inspections and audits to identify occupational safety and health risks and hazardous factors.
- 9.8. The Bank ensures a thorough and timely investigation of accidents related to the work activities of Bank employees, including registration, accounting and analysis of accidents and occupational diseases related to the work activities of Bank employees.
- 9.9. Bank employees are prohibited from being in the workplace and on the territory of the Bank in a state of alcoholic, narcotic or other intoxication, as well as from bringing and distributing narcotic and other substances prohibited by the legislation of the Kyrgyz Republic.

10. Approaches of the Bank to Sustainable Development

- 10.1. The Bank strives to improve corporate governance and corporate performance in the sustainable development area, as well as to minimize the negative and increase the positive social and environmental impact of its activities through the provision of sustainable financing, innovation, interaction with the state, local communities and other stakeholders.
- 10.2. The Bank understands the long-term importance of national and international sustainable development partnerships, associations and unions. The Bank focuses on opportunities to gain membership in key partnerships, associations and unions that support the promotion of sustainable development principles and a low-carbon economy.
- 10.3. The Bank strives to ensure responsible resource management and environmental safety in its own activities, in particular supporting the transition to a circular economy, introducing energy-efficient technologies, reducing water consumption and paper consumption for office needs.
- 10.4. The Bank strives to improve the consideration of risks and opportunities in corporate governance, environmental protection and social sphere in the formation and implementation of corporate strategy and the overall development of the Bank.
- 10.5. The Bank is interested in informing stakeholders about the results of its activities in the field of sustainable development by publishing annual non-financial reports in accordance with international standards of information disclosure, as well as the requirements of the legislation of the Kyrgyz Republic.
- 10.6. The Bank recognizes the importance of encouraging suppliers, contractors and other counterparties of the Bank to comply with internationally recognized principles in the area of sustainable development and climate change, including through informing counterparties of the Bank about the principles and factors of sustainable development.
- 10.7. The Bank will strive to introduce tools for assessing clients and projects financed by the Bank for compliance with ESG principles into the lending process.
- 10.8. The Bank intends to develop and advance financial products and services that facilitate the achievement of the United Nations Sustainable Development Goals by the Kyrgyz Republic, clients and other stakeholders of the Bank, and enhance the social and environmental sustainability of the national economy and stakeholders of the Bank.
- 10.9. The Bank recognizes the need to ensure the long-term resilience of operations, assets and loan portfolio of the Bank to climate-related risks, as well as the need to properly manage greenhouse gas emissions.
- 10.10. The Bank considers it an important priority to organize the attraction and effective distribution of capital to finance green and climate projects and initiatives of clients of the Bank and support the process of decarbonization of the economy of the Kyrgyz Republic, as well as implementation of measures and initiatives directly of the Bank in the area of combating climate change.
- 10.11. The Bank is committed to annual public disclosure of greenhouse gas emissions reporting in accordance with the Greenhouse Gas Protocol (GHG Protocol).

11. Compliance with the Code and Liability for Violations

- 11.1. Regardless of their position and tenure at the Bank, all Bank employees bear personal responsibility for failure to comply with the principles and requirements of the Code. Heads of structural units of the Bank

also bear responsibility for failure to comply with the principles and requirements of the Code by their subordinates.

- 11.2. Each employee of the Bank is obliged to familiarize themselves with the Code and confirm in writing the obligation to conscientiously comply with the Code in accordance with the form established by Appendix No. 1 to the Code.
- 11.3. Bank employees who violate the principles and requirements of the Code may be subject to disciplinary, administrative or other liability, depending on the nature of the violation they committed, at the initiative of the Bank or law enforcement agencies.
- 11.4. Information on compliance with the Code is taken into account when assessing and promoting Bank employees.
- 11.5. If Bank employees are not sure about the ethics of their own decisions and actions or the decisions and actions of their colleagues, they should seek help from their immediate supervisor or the compliance control division of the Bank.
- 11.6. The structural unit of the Bank that is responsible for regular control and monitoring of implementation of the Code is the compliance control division.
- 11.7. To ensure proper understanding and compliance of the Code by Bank employees, the HR department of the Bank ensures that the Bank's employees are familiar with the Code with the support of the compliance control division and the heads of structural units of the Bank.

12. Reporting Violations

- 12.1. The Bank expects that employees, clients, counterparties of the Bank, as well as any other stakeholders that believe that the principles and requirements of the Code are being violated, will report information about suspected violations of the Code, as well as suspected damage to the interests or reputation of the Bank by e-mail [to: risk_compliance@rsk.kg](mailto:risk_compliance@rsk.kg).
- 12.2. Bank employees are prohibited from concealing information about unethical behavior of other Bank employees, information about cases of theft and damage to the property of the Bank, corruption violations on the part of employees and counterparties of the Bank, cases of forced labor and discrimination, transfer of insider and confidential information to third parties, and cases of workplace injuries.
- 12.3. In the event of detection and confirmation of facts of violation of the principles and requirements of the Code, the Bank conducts official investigations and takes measures to eliminate and prevent such violations.
- 12.4. The Bank guarantees that Bank employees will not be subject to any persecution, pressure or sanctions, including disciplinary action, in the event of good faith provision of information on potential violations of the Code, suspicions of damage to the interests or reputation of the Bank.
- 12.5. The Bank guarantees that the information provided will in no way be used against the applicant, including against Bank employee.
- 12.6. The heads of structural units of the Bank bear personal responsibility for preventing Bank employees from transmitting information about potential violations of the Code, suspicions of damage to the interests or reputation of the Bank, as well as for applying disciplinary and other measures to Bank employees in connection with their submission of such information.

13. Final Provisions

- 13.1. The Code, as well as additions and amendments to it, are approved and declared invalid by a decision of the Board of Directors.
- 13.2. The Code is reviewed at least once every 3 (three) years for its relevance, compliance with the legislation of the Kyrgyz Republic and international practices of responsible business conduct that do not contradict the legislation of the Kyrgyz Republic.
- 13.3. If certain parts of the Code come into contradiction with the legislation of the Kyrgyz Republic as a result of changes in the legislation of the Kyrgyz Republic, the provisions of the legislation of the Kyrgyz Republic shall apply until the relevant changes are made to the Code.

Obligation of an employee of Eldik Bank OJSC to comply with the Code of Business Ethics of Eldik Bank OJSC

I confirm that I have fully and carefully read the Code of Business Ethics of Eldik Bank OJSC.

I undertake to faithfully comply with the provisions and requirements of the Code of Business Ethics of Eldik Bank OJSC.

I was informed that in the event of my violation of the Code of Business Ethics of Eldik Bank OJSC, I may be subject to disciplinary, administrative and other liability in accordance with the procedure established by the legislation of the Kyrgyz Republic and the internal documents of Eldik Bank OJSC.

Full name of the Bank employee

Bank employee position

Signature of the Bank employee

Date of signing (day, month, year)