


Appendix No.4  
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Management Board of Otbasy Bank JSC  
(Minutes No.152) dated 26.09.2023

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**Regulations on diversity and inclusion  
Otbasy Bank JSC**

Almaty, 2023

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### Chapter 1. General provisions

1. These Regulations on diversity and inclusion of Otbas Bank JSC (hereinafter referred to as the Regulations) are aimed at establishment of equal opportunities for all workers, employees, overcoming of all forms and manifestations of discrimination, and development of a process, which ensures consideration of needs of all categories of workers and employees equally in any planned activity or project. The Bank shall strive to create the inclusive culture with openness and meaningful challenge, where workers/employees feel themselves respected, valuable and supported.

2. The Bank shall adhere and develop principles of diversity and inclusion, recognize their importance and universality, share the confidence that diversity and inclusion represent key factors in achievement of the Bank's long-term development goals, retention of talents, adoption of the most efficient decisions, as well as allow prompt responding to dynamic changes of environment.

3. These Regulations confirm the adherence of the Bank to encouragement of diversity of workers at all levels and demonstrate zero tolerance to any manifestations of discrimination.

4. The Bank is committed to compliance with the principles of these Regulations in relations with all stakeholders and expects them to adhere to high ethical standards and refrain from any activity that may be considered to violate these standards.

5. Diversity and inclusion are strategically important to the Bank's success. The Bank believes that creating a culture of diversity and inclusion leads to more creative and innovative solutions, improves productivity and strengthens the trust of customers and stakeholders and the Bank's reputation in the community and internationally.

6. The Bank shall recognize, value and actively support diversity and inclusion within the company and is committed to creating a work environment in which all workers and employees feel accepted, respected and can achieve their full potential. The Bank shall strive to promote the achievement of equality goals aimed at the sustainable institutional development of the Bank.

### Chapter 2. Basic terms and definitions

7. The following basic terms and definitions are used in the Regulations:

**1) Gender** - a social aspect of relations between men and women, which manifests itself in all spheres of life;

**2) Gender equality**- a legal status that provides men and women with equal rights and equal opportunities and real access to participation in political, economic, social, public and cultural spheres of life, regardless of gender;

**3) Discrimination** - any distinction, exclusion or preference made on the basis of race, skin color, gender, religion, political beliefs, national origin or social affiliation, leading to the destruction or violation of equality of opportunities or treatment in the field of work and occupation;

**4) Inclusion** - creating conditions in which different socio-cultural groups of people and each individual are valued, accepted and respected for their unique skills, experience and development prospects; as well as in which they are given equal opportunities to participate in the Bank's activities for achievement of success;

**5) Diversity** - empowerment of people based on respect and recognition of the value of differences between them by age, gender, ethnicity, religion, disability, sexual orientation, education, nationality, abilities, social origin and other characteristics;

**6) Project** - a potential or concluded transaction involving the provision of services by the Bank in accordance with the license;

**7) Bank's worker** – a person who has concluded an employment contract with the Bank;

**8) Equal opportunities** - a system of means and conditions required for the achievement of equality of rights;

**9) Equal rights** - the right to exercise civil, political, economic, social, cultural and other rights, guaranteed by the State, enshrined in the Constitution and laws of the Republic of Kazakhstan, and equal for all categories of persons;

**10) Bank's employee** – a person who has concluded a civil contract with the Bank;

**11) Harassment** - human behavior that causes inconvenience or even harm to another person, violating his/her personal privacy.

### **Chapter 3. Basic principles**

8. The Bank shall adhere to diversity and inclusion principles, set out in the following paragraphs, in the course of its activities.

9. Encouragement of diversity and inclusion:

**1) gender equality and inclusion:**

- overcoming all forms and manifestations of gender discrimination;
- promoting gender equality in the implementation of the Bank's activities and development of a process, in which the needs of women are taken into account equally with needs of men in any planned activity or project;
- encouraging greater participation of women in the activities and management of the Bank;

- collection of high-quality information, taking into account the separation of data by gender;
- creating a social, physical and psychological environment that promotes equal and fair treatment of men and women.

**2) age inclusion:**

- creating a work environment that values and respects different age groups;
- elimination of prejudice and discrimination in relation to age and ensuring equal opportunities for development and promotion for workers, employees of all ages.

**3) religious and cultural inclusion:**

- respect and recognition of various religions, beliefs and cultural practices.

**4) inclusion by nationality and ethnic origin:**

- respect and recognition of various nationalities and ethnic groups;
- creating a work environment that welcomes the diversity of cultures and provides equal opportunities for employees, workers of different nationalities and ethnic groups.

**5) inclusion for persons with disabilities:**

- removing barriers and ensuring equal opportunities for persons with disabilities;
- adaptation of the working environment and provision of social conditions to support the full inclusion and participation of persons with disabilities.

**6) inclusion for parents and families:**

- creation of flexible working conditions and policies that support employees, workers, who are parents, and take into account their family responsibilities in accordance with the standards of labor legislation;
- providing opportunities for work-life balance.

**7) inclusion by socio-economic status:**

- recognition and accounting of various socio-economic statuses of workers/employees;
- ensuring equal opportunities and support for the professional and career growth of workers, employees, regardless of their financial or social status.

**8) inclusion by language:**

- support for multilingualism and respect for different languages and cultures;
- ensuring equal opportunities for workers, employees whose language skills may differ, and providing means of communication and translation, if necessary.

**10. Respect for the interests of stakeholders.**

The Bank shall take into account the expectations and interests of stakeholders in the field of diversity and inclusion in the course of its activities and conduct a constant dialogue with them in this area. The Bank shall be open for discussion with stakeholders of any issues in the field of diversity and inclusion and creates conditions for such discussion.

**11. Observance and protection of human rights.**

The Bank shall recognize the importance of observing and protecting the rights of every person and does everything possible to ensure their observance and protection by the Bank.

The Bank shall not accept discrimination in any form and shall make every effort to counteract discrimination, taking into account the provisions of Convention No. 190 of the International Labour Organization dated 10.06.2019 "Eliminating Violence and Harassment in the World of Work".

#### 12. Openness.

The Bank shall provide public reporting on the issues of diversity and inclusion as part of the Bank's Sustainability Report and consider constructive criticism of stakeholders as a source of improving its diversity and inclusion practices.

13. Stimulating workers, employees for growth regardless of age, gender and other characteristics.

The Bank shall encourage workers, employees regardless of age, gender and other characteristics to develop through training in order to improve professional and personal competencies.

14. All the principles set out in paragraphs 9-13 of these Regulations should be observed by the management, all workers, employees of the Bank and entities interacting with the Bank in the course of its activities.

### **Chapter 4. Main objectives**

15. The Bank shall implement the following objectives for compliance with the principles set forth in Section 3 of these Regulations:

1) provision of equal opportunities for all workers, employees of the Bank in all aspects of work, including hiring, promotion, remuneration, training and development.

2) hiring workers/employees based on their qualifications, skills and experience.

3) combating any form of discrimination, including direct or indirect discrimination, infringement of rights and harassment based on race, skin color, nationality, religion, gender, age or any other characteristics.

4) appointment of the Designated Official for Diversity and Inclusion Issues, including for gender aspects, who is appointed by the order of the Chairman of the Management Board (not lower than the Deputy Chairman of the Management Board)

5) improvement of the corporate governance system in accordance with the best international practices, which not only contributes to creating an atmosphere of trust, transparency and responsibility, but also helps to align the Bank's goals with the interests of society, including in the field of diversity and inclusion, building strong long-term relationships with stakeholders.

6) provision of access to training and development for all workers/employees in order to increase their awareness of diversity and inclusion issues. The training shall include conscious training in cross-cultural understanding, awareness of stereotypes and prejudices, communication skills and the creation of an inclusive work environment.

7) establishment of arrangements for workers/employees to openly express ideas, concerns and assumptions about diversity and inclusion and conduct surveys to assess the effectiveness of policies and identify areas for further improvement.

8) continuous improvement of the Regulations in accordance with changing trends and best practices. For these purposes, feedback from workers/employees, research in the field of

diversity and inclusion, as well as changes in international standards and policies will be taken into account to ensure the relevance and effectiveness of the Regulations.

9) encouraging all workers/employees to actively support and comply with these Regulations. Any kind of discrimination, belittlement, harassment and other human rights violations will be considered and prosecuted in strict accordance with the legislation of the Republic of Kazakhstan.

10) ensuring the access to the Regulations for all workers/employees through an internal corporate portal. The Bank shall encourage each member of the workers/employee to accept the provisions of this Regulations and contribute to the creation of a working environment that values and respects each member of our team. We will be able to achieve our goals of maintaining diversity and inclusion only through joint efforts and cooperation.

11) reflecting aspects of diversity and inclusion in the policies, rules and regulations governing human resource management activities, based on the principle of respect for equal rights and equal opportunities of workers/employees of the Bank.

12) annual holding of workshops, training programs and discussions to promote and create conditions for a culture of diversity and inclusion.

## **Chapter 5. Reporting on implementation of the Regulations**

16. The Bank shall annually develop an Action Plan within the framework of the objectives set out in these Regulations (hereinafter referred to as the Action Plan).

17. The Action Plan is developed by the Department of Management of Human Resources and Operational Activities and approved by the Management Board of the Bank by March 1 of the current year.

18. The structural divisions shall send information on the implementation of the Action Plan to the Department of Management of Human Resources and Operational Activities by December 10 of the current year.

19. The Department of Management of Human Resources and Operational Activities shall prepare the annual report on the implementation of the Action Plan and submit it for review by the Management Board of the Bank by December 20 of the current year.

20. The annual report on the implementation of the Action Plan shall be posted on the Bank's official web-site [www.hcsbk.kz](http://www.hcsbk.kz) by December 31 of the current year.

## **Chapter 6. Final provisions**

21. The Management Board and structural divisions of the Bank should be guided by the principles of the Regulations in exercising their functions in the course of the Bank's activities.

22. Other matters and procedures not covered by the Regulations shall be regulated by regulatory legal acts of the Republic of Kazakhstan and internal documents of the Bank.

23. The Department of Planning and Strategic Analysis shall bear responsibility for timely update of the Regulations.

24. In order to develop the practice of ensuring and promoting diversity and inclusion policies, the Bank may engage external consultants to conduct research, improve the effectiveness of materials and activities to solve problems in the field of diversity and inclusion.

25. The worker/employee shall always have the opportunity to get advice on the implementation of these Regulations, as well as to report violations of the provisions of the Regulations and other violations of the legislation and internal documents of the Bank, including in accordance with the procedure established by the internal document of the Bank regulating the procedure for reporting violations, by contacting:

- Blog of the Chairman of the Management Board on the corporate website of the Bank;
- Designated Official for Diversity and Inclusion Issues, including about gender aspects;
- Representative of Bank's workers (for Bank's workers);
- Ombudsman of the Bank (for Bank's workers).

26. The Bank undertakes to protect the rights of those who report violations in good faith and prevent their prosecution.