

**Extracts from the Rules for reporting violations
regarding the activities of Otbasy Bank JSC**

Almaty, 2023

In its activities, the Bank strives to ensure comprehensive protection of the interests of the Bank, its employees, staff, consultants, clients and counterparties.

In order to improve the efficiency of risk management, adequate counteraction to abuse, timely detection of possible facts of corruption, fraud or unlawful receipt, disclosure and/or use of information constituting commercial, banking and other legally protected secrets, as well as other violations in the Bank's activities, which may threaten the strategic goals, reputation or image of the Bank, as a supplement to the mechanisms applied in the Bank to prevent abuse and violations of functional duties procedures for reporting violations related to the Bank's activities have been developed.

The main purposes of whistleblowing procedures are:

- improving the level of corporate governance;
- timely identification of possible violations related to the Bank's activities and civil, tax, banking legislation of the Republic of Kazakhstan, legislation of the Republic of Kazakhstan on state regulation, control and supervision of the financial market and financial organizations, legislation of the Republic of Kazakhstan on currency regulation and currency control, on payments and payment systems, on pension provision, on securities market, on accounting and financial reporting, on credit bureaus and formation of credit records, on debt collection activities, on mandatory deposit guarantee, on combating legalization (laundering) of proceeds of crime and financing of terrorism, on joint stock companies and internal documents of the Bank, abuse or cases of illegal receipt, disclosure and/or use of information constituting commercial, banking and other protected information;
- minimizing the risk of loss of reputation, financial, legal and other risks.

As part of the procedures for reporting violations concerning the Bank's activities, Applications may be submitted containing information on the following types of misconduct of the employee, staff member, consultant in respect of whom the Application was submitted:

- 1) abuse of functions, deceit, fraud or corruption;
- 2) falsification of the Bank's data/reporting;
- 3) irregularities in the Bank's finances that may result in financial losses or reputational risk for the Bank;
- 4) misuse of relationships with customers, suppliers, contractors and others;
- 5) unlawful receipt and transfer of confidential information;
- 6) non-compliance/violation of the legislation of the Republic of Kazakhstan and internal documents of the Bank, including the norms of business ethics.

Applications may be submitted by mail, hotline (+7 (727) 330-94-82), or email (antifraud@otbasybank.kz).

Applications recognized as anonymous shall not be considered, except in cases prescribed by law.