

**Anti-corruption standards of
Otbasy bank JSC**

1. Anti-corruption standards of Otbasyl Bank JSC (hereinafter - the Bank) are developed in accordance with the current legislation of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption", the Criminal Code of the Republic of Kazakhstan, internal documents of Otbasyl Bank JSC.

2. Anti-corruption standards are targeted at achieving an atmosphere of intolerance to any manifestations of corruption in the Bank by creating a system of value and moral anti-corruption guidelines for the Bank's employees, staff and consultants when performing their job duties and contractual obligations.

3. Name of the sphere of social relations: finances.

4. The anti-corruption standards define the following norms of behavior for the Bank's employees, staff and consultants:

1) to be guided by the principle of legality, requirements of the Constitution, laws and other normative legal acts of the Republic of Kazakhstan, and strictly comply with anti-corruption legislation;

2) to ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) not to allow actions that may discredit the Bank;

4) to report to the immediate or direct supervisor of an employee/staff member of the Bank or to the head of the unit coordinating the consultant network on the occurrence of a conflict of interest, personal interest in the performance of official duties or contractual obligations, inducement to corrupt behavior and receipt of gifts;

5) not to be guided by personal and (or) vested interests in the performance of official duties and contractual obligations;

6) to refrain from making improper requests to colleagues and supervisors that violate the established order of relations and that may influence their impartial official or other decisions;

7) not to induce other employees, staff and consultants to commit corruption offenses and not to encourage such actions;

8) not to accept gifts in connection with the fulfillment of official powers and contractual obligations;

9) not to use official and other information, including information obtained in the process of fulfillment of contractual obligations, which is not subject to dissemination, for the purpose of obtaining or extracting property and non-property benefits and advantages;

10) to refuse to be appointed to a position (or to sign an agency/paid services agreement) if it involves direct subordination or control over persons who are in close kinship and family relations (parents, spouses, brothers, sisters, children, in-laws (brothers, sisters, parents and children of a spouse));

11) to be active in combating corruption, in disclosing corruption offenses;

12) to immediately report to the employee's/staff member's supervisor or to the head of the unit coordinating the consultant network on known facts of corruption, including inducement to obtain any benefits, unjustified bureaucracy and red tape when considering loan applications and other requests of individuals and legal entities;

13) to immediately report in writing to the employee's/staff member's direct or immediate supervisor, or to the head of the unit coordinating the consultant network, any doubts about the legitimacy of an order received for execution;

14) to contact superiors if the direct supervisor is himself or herself involved in a conflict of interest;

15) to support and demand from colleagues the observance of a high legal anti-corruption culture;

16) on an ongoing basis to take measures to eliminate causes and conditions of possible conflict of interest, corruption offenses and their consequences;

17) to refrain from representing or lobbying third parties or acting on their behalf;

18) not to use for non-business purposes the means of material, technical, financial and

information support, as well as other property of the Bank and official information, as well as information obtained in the process of fulfillment of contractual obligations.

5. Managers at all levels are required in their subordinate relationships:

1) to prevent cases of selection and placement of personnel on the basis of kinship and compatriotism, to ensure compliance with the principles of meritocracy;

2) to precisely define the tasks and scope of authority of subordinate employees;

3) not to allow unequal distribution of the labor load among the employees under their subordination;

4) to demonstrate fairness and objectivity in assessing the performance of subordinates, as well as in applying rewards and penalties;

5) not to give orders to subordinates that are clearly impossible or beyond the scope of their official duties or contrary to the law;

6) not to use his/her official position to influence the activities of subordinates when addressing issues of a non-business nature;

7) not to force subordinate employees to commit corruption offenses;

8) to prevent and suppress violations of anti-corruption laws by subordinates and other employees;

9) to timely take exhaustive measures to resolve conflicts of interest arising in a subordinate employee in the course of performance of his/her official duties;

10) to take exhaustive measures to prevent corruption;

11) to eliminate causes and conditions contributing to the commission of corruption offenses by subordinates;

12) not to allow subordinates to be engaged for off-duty or personal tasks;

13) to set an example for subordinate employees by their impeccable behavior.

6. Managers at all levels shall ensure compliance with these Anti-Corruption Standards and organize anti-corruption work among their subordinate employees and other supervised persons (employees, consultants).