

**APPROVED**

by the Resolution of the Board of Directors

of OJSC "Aiyl Bank"

dated May 30, 2018, No. 22/1



**ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «АЙЫЛ БАНК»  
АЧЫК АКЦИОНЕРДИК КООМУ «АЙЫЛ БАНК»  
THE OPEN JOINT-STOCK COMPANY «AIYL BANK»**

**ANTI-CORRUPTION POLICY OF OJSC "AIYL BANK"**

*(As amended by the Resolutions of the Board of Directors of OJSC "Aiyl Bank" dated June 20, 2019, No. 31/1; January 20, 2020, No. 3/1; January 21, 2021, No. 4/5; November 19, 2021, No. 61/5; January 24, 2023, No. 3/3; January 11, 2024, No. 2/8; May 20, 2025, No. 31/4)*

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## **CHAPTER I. GENERAL PROVISIONS**

1.1. The Anti-Corruption Policy of OJSC "Aiyl Bank" (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the Law of the Kyrgyz Republic "On Combating Corruption" and other applicable legislation of the Kyrgyz Republic in the field of anti-corruption. The development of the Policy also takes into account best international practices in combating corruption. The Policy does not contradict international treaties concluded by the Kyrgyz Republic or other regulatory legal acts applicable to the Bank.

1.2. This Policy defines the main goals and objectives of combating corruption and commercial bribery at OJSC "Aiyl Bank" (hereinafter referred to as the Bank), the participants in the process, their tasks, functions, powers, and responsibilities, as well as the principles of the anti-corruption system's operation within the Bank.

1.3. This Policy is an integral part of the Bank's compliance control and internal control systems and establishes the managerial and organizational framework for preventing corruption, fraud, and illicit receipt of remuneration (commercial bribery), as well as minimizing and/or eliminating the consequences of offenses within the Bank, including in relations with third parties, such as clients and counterparties.

1.4. This Policy is designed to minimize the risk of corruption and commercial bribery within the Bank.

1.5. (Excluded pursuant to the Resolution of the Board of Directors of OJSC "Aiyl Bank" dated May 20, 2025, No. 31/4)

1.6. The Bank publishes this Policy on its official website and openly promotes a policy of zero tolerance for corruption and commercial bribery, encouraging and supporting adherence to the principles and requirements of this Policy by all officials and employees of the Bank.

1.7. This Policy is uniform for all structural divisions of the Bank and is mandatory for implementation.

1.8. *(Excluded pursuant to the Resolution of the Board of Directors of OJSC "Aiył Bank" dated May 20, 2025, No. 31/4)*

## CHAPTER II. TERMS AND DEFINITIONS

- 2.1. **Bribe** – Money, securities, other valuable property, benefits, and/or services of a proprietary nature provided (rendered) free of charge or at a reduced cost (hereinafter referred to as the subject of a bribe), transferred (rendered) or offered to an employee of the Bank, received by an employee of the Bank personally or through an intermediary for actions (or inaction) in favor of the bribe-giver or persons represented by them, if such actions (or inaction) fall within the employee’s official duties, or if, by virtue of their official position, they can facilitate such actions (or inaction), as well as for general patronage or connivance in the performance of duties. For the purposes of the term “bribe,” there are no minimum monetary thresholds; any transferred (received) subject of a bribe may be interpreted as giving (receiving) a bribe.
- 2.2. **Facilitation Payments** – Small monetary amounts or other benefits, regardless of their value, paid to officials or government authorities to facilitate or expedite the performance of routine administrative formalities.
- 2.3. **Bank Officials (Bank Management)** – Members of the Bank’s Board of Directors and Management Board, as well as employees of the Bank subject to approval procedures by the National Bank.
- 2.4. **Abuse of Authority** – The use by a person performing managerial functions in the Bank of their authority contrary to the legitimate interests of the Bank, with the aim of obtaining benefits or advantages for themselves or others, or causing harm to others, if this intentionally or negligently causes significant harm.
- 2.5. **Client** – An individual or legal entity receiving services from the Bank.
- 2.6. **Counterparty** – An individual or legal entity that is a party to a contract with the Bank and is not a Client.
- 2.7. **Conflict of Interest** – A situation in which there is a contradiction between the personal interests of Bank officials and/or its employees and the proper performance of their official duties or the proprietary and other interests of the Bank and/or its employees and/or clients, which may lead to risks of adverse consequences for the Bank and/or its clients.
- 2.8. **Corrupt Offense** – An unlawful, culpable act (action or inaction) by one or more officials, established in accordance with due procedure, containing signs of corruption.

**2.9. Commercial Bribery** – The illegal transfer of money, securities, or other property to a person performing managerial functions in the Bank, as well as the illegal provision of proprietary services to them for actions (or inaction) in the interests of the giver in connection with the official position held by that person.

**2.10. Corruption** – Intentional acts involving the creation of an unlawful, stable relationship between one or more officials with authority and individuals or groups to illegally obtain material or other benefits and advantages, as well as the provision of such benefits and advantages to individuals and legal entities, posing a threat to the interests of society or the state.

Within the framework of this Policy, corruption (corrupt practices) refers to the abuse of official position, giving/receiving a bribe by a Bank official (management), or any other illegal use by Bank officials of their official position contrary to the legitimate interests of the Bank and the state to obtain benefits in the form of money, valuables, other property or proprietary services, or other proprietary rights for themselves, as well as the provision of such benefits to third parties, or the illegal provision of such benefits to Bank officials by other persons, posing a threat to the interests of the Bank.

Additionally, within the framework of this Policy, unlawful actions against the Bank include the illegal receipt by Bank employees, regardless of their position in the Bank, of material rewards or other proprietary benefits for performing certain actions related to the use of their official position in the Bank.

**2.11. Personal (Private) Interest** – Material and/or other benefits, including advantages, that a Bank official (management) or employee, regardless of their position in the Bank, seeks to obtain for themselves as a result of performing their official duties. Promotions and expressions of gratitude do not constitute personal benefits.

**2.12. Bribery Intermediation** – Actions aimed at transferring a bribe on behalf of the bribe-giver or bribe-receiver or otherwise facilitating the bribe-giver and/or bribe-receiver in reaching or implementing an agreement between them for giving/receiving a bribe, or intermediation in bribery using one’s official powers, or when transferring or receiving a bribe in a large or particularly large amount.

**2.13. Corruption Prevention** – The Bank’s activities expressed in the adoption of systemic measures aimed at introducing elements of corporate culture, organizational structure, rules, and procedures regulated by internal normative documents to ensure the prevention of corrupt practices.

**2.14. Corruption Prophylaxis** – The Bank’s activities expressed in the adoption of systemic measures aimed at identifying and subsequently eliminating the causes of corruption.

**2.15. Bank Employee** – Any individual who has entered into an employment relationship with the Bank.

## **CHAPTER III. GOALS, OBJECTIVES, PRINCIPLES, CORRUPT PRACTICES, AND ANTI-CORRUPTION POLICY MEASURES**

3.1. The main goals of the Anti-Corruption Policy are:

- Ensuring the Bank’s activities comply with the anti-corruption legislation of the Kyrgyz Republic;
- Protecting the Bank’s shareholders and clients from financial losses in the event of corruption and commercial bribery within the Bank;
- Fostering a uniform understanding among Bank officials (management), employees regardless of their position, and persons interacting with the Bank of the Bank’s stance on zero tolerance for corruption and commercial bribery in any form or manifestation;
- Establishing mandatory and adequate procedures within the Bank to prevent corruption;
- Ensuring compliance with the provisions of the Bank’s Corporate Governance Code.

**3.2. Combating corruption involves the activities of the Board of Directors and the Management Board within their authority to:**

- Prevent corruption, including identifying and subsequently eliminating the causes of corruption;
- Assist law enforcement agencies in minimizing and/or eliminating the consequences of corrupt practices.

**3.3. The main objectives of combating corruption in the Bank are:**

- Facilitating the implementation of the requirements of the Law on Combating Corruption within the Bank’s authority;
- Creating effective mechanisms, procedures, controls, and other measures aimed at preventing and combating corruption and commercial bribery (including the development and approval of an Action Plan to prevent corruption manifestations/risks at OJSC "Aiyl Bank");
- Minimizing the risks of involving the Bank and its employees in corrupt activities;
- Informing the Bank’s management bodies about corrupt offenses and measures taken to combat corruption;
- Fostering an anti-corruption corporate culture within the Bank.

**3.4. The principles of combating corruption are:**

- Compliance of this Policy with legislation and generally accepted norms;
- Protection of the legitimate rights and interests of the Bank’s clients and counterparties, and adherence to banking and commercial confidentiality during anti-corruption measures;
- Personal example set by the Bank’s management in fostering a culture of intolerance toward corruption and creating a system for preventing and combating corruption;
- Employee engagement: ensuring employees are informed about anti-corruption legislation and their active participation in developing and implementing anti-

- corruption standards and procedures aimed at ensuring fair operations;
- Inevitability of accountability for Bank employees, regardless of their position, length of service, or other conditions, in case of committing corrupt offenses related to their job duties;
- Transparency in business conduct: informing partners, counterparties, and clients about the anti-corruption standards adopted by the Bank;
- Continuous monitoring of the effectiveness of implemented anti-corruption standards and procedures, as well as ensuring their enforcement to promote fair operations;
- Ensuring the protection of the rights and interests of Bank employees who assist in combating corruption-related offenses.

### **3.5. Corrupt Practices:**

3.5.1. In accordance with the legislation of the Kyrgyz Republic and international anti-corruption practices, corrupt practices include those specified in clause 3.5.2 of this Policy, committed:

- Against the Bank or on behalf of or in the interests of the Bank with respect to third parties, including state and municipal authorities, state companies and their employees, the National Bank of the Kyrgyz Republic and its employees, other legal entities and their employees, management bodies, and representatives of such entities;
- Directly or indirectly (personally or through intermediaries);
- Regardless of the purpose, including facilitating administrative or other procedures or securing competitive or other advantages;
- In any form, including receiving/providing money, valuables, other property or proprietary services, or other proprietary rights.

3.5.2. Corrupt practices, committed for the purposes, in the form, or in the manner specified in clause 3.5.1 of this Policy, include:

- Giving a bribe and intermediation in bribery, i.e., providing or promising to provide any financial or other benefit/advantage with the intent to induce a person to improperly perform their official duties, i.e., on terms more favorable to the giver and/or in violation of procedures established by the legislation of the Kyrgyz Republic and/or the Bank’s internal regulations;
- Receiving a bribe and intermediation in receiving

## **CHAPTER IV. MAIN DIRECTIONS OF THE BANK’S ACTIVITIES IN PREVENTING AND COMBATING CORRUPTION**

4.1. The main directions of the Bank’s activities in preventing and combating corruption are:

- Corporate governance and human resources policy of the Bank;
- Credit activities of the Bank;
- Operational activities of the Bank;
- Financial and economic activities of the Bank.

4.2. To effectively identify, assess, and minimize the risks of corrupt practices in the Bank, the following main approaches are applied:

- Identification of functions, types of banking operations, transactions, and business processes, as well as positions, based on the scope of authority and opportunities for discretionary decision-making associated with high corruption risks;
- Evaluation and processing of any information received regarding corrupt offenses or any instances of attempts to induce Bank employees to commit corrupt offenses;
- Imposition of legally defined requirements and/or those stipulated in employment contracts on Bank officials and candidates for managerial positions;
- Implementation of a transparent and adequate remuneration system for Bank officials and employees;
- Appointment to managerial positions in compliance with the legislation of the Kyrgyz Republic, regulatory acts of the National Bank, and the Bank’s internal regulations;
- Evaluation, promotion, or rotation of personnel based on their professional and work potential to prevent potential corrupt practices;
- Control over representation expenses and compliance with the legislation of the Kyrgyz Republic on public procurement during Bank tenders for the purchase of goods, works, and services;
- Procedures for resolving and preventing conflicts of interest in accordance with the legislation of the Kyrgyz Republic, regulatory acts of the National Bank, and the Bank’s internal regulations;
- Procedures for assessing, analyzing, and selecting the Bank’s counterparties;
- Conducting interviews with Bank borrowers during credit activity inspections and visits to verify whether there have been instances of demands for material or other rewards by Bank employees and/or other individuals;
- Monitoring compliance by Bank employees with established lending procedures;
- Verification of compliance by Bank employees directly involved in providing banking products (services) to clients with the Customer Service Standards of OJSC "Aiył Bank";
- Compliance with the requirements of the legislation of the Kyrgyz Republic, regulatory acts of the National Bank, and the Bank’s internal regulations when opening bank accounts and deposits, conducting money transfers, and providing other banking operations and services;
- Implementation of managerial accounting, including planning and budgeting, and internal financial control of the Bank’s operations;
- Application of internal control, reporting, and information exchange in every transaction and business process to prevent, detect, and deter unlawful actions;
- Systematic training of employees to enhance their awareness of the Bank’s anti-corruption policy and the legislation of the Kyrgyz Republic on combating corruption.

4.3. To ensure the reliability and accuracy of financial (accounting) and other reporting, compliance with the requirements of the legislation of the Kyrgyz Republic and the Bank’s internal regulations, and the prevention and detection of corrupt offenses, the Bank conducts internal control of banking operations and

services, business processes, economic operations, and financial control, including preventing the following actions:

- Creation of unofficial (double) reporting;
- Absence of primary accounting documents;
- Conducting unrecorded or incorrectly recorded transactions;
- Recording non-existent expenses;
- Reflecting obligations with improperly identified objects;
- Use of forged documents (e.g., falsification of collateral property, acceptance of documents without verifying their authenticity, and illegal disposal of collateral property);
- Intentional destruction of documents and reporting before the deadlines stipulated by legislation;
- Use of front persons to obtain loans or leases;
- Collusion between Bank officials, employees, and third parties to obtain personal benefits through corrupt schemes and the withdrawal of funds;
- Intentional violation of internal control procedures stipulated by the Bank’s internal regulations;
- Other unlawful corrupt practices within the Bank.

4.4. The Security Department shall conduct internal investigations regarding all suspicions of corrupt practices within the Bank.

4.5. In cases where suspicions are confirmed and instances of commercial bribery or corruption are identified, the Security Department, in coordination with the Bank’s management and the Legal Department, shall refer the matter to the relevant law enforcement authorities for legal assessment.

4.6. Engaging in illegal entrepreneurial activities, including those resembling usurious practices, within or outside the Bank, which entail liability under the legislation of the Kyrgyz Republic, is prohibited.

4.7. Employees dismissed from the Bank for negative reasons, such as fraudulent or other serious financial violations of a corrupt nature, causing significant material damage to the Bank, or actions leading to serious reputational risks for the Bank, are included in a list of unreliable employees (“blacklist”). Such individuals are subsequently prohibited from working in the Bank’s structural units, branches, or other representations.

The Human Resources Department is responsible for maintaining and updating this list, with reports on the list submitted to the Board of Directors and the Management Board annually.

4.8. (Excluded pursuant to the Resolution of the Board of Directors of OJSC "Aiył Bank" dated November 19, 2021, No. 61/5)

4.9. Fraudulent and gray schemes, as well as corrupt practices or offenses identified by the Internal Audit Department, Security Department, or other structural units

and branches of the Bank, are forwarded to the Compliance Control Department for consolidation, analysis, and implementation of preventive and prophylactic measures to combat corruption and fraud within the Bank.

- 4.10. The Head of the Compliance Control Department is the authorized person in the Bank responsible for the timely implementation of the Bank’s anti-corruption and anti-commercial bribery measures, as well as for periodically informing the Board of Directors, shareholders, and other entities of the Kyrgyz Republic’s anti-corruption policy.

## **CHAPTER V. ORGANIZATION OF THE “HOTLINE” AND “EMPLOYEE HOTLINE” IN THE BANK, REPORTING OF VIOLATIONS**

- 5.1. To enhance the quality of corporate governance and provide stakeholders with the opportunity to freely report information about corrupt offenses committed by Bank employees, as well as to ensure that all Bank employees can reliably inform the Bank’s management bodies and leadership about violations of the legislation of the Kyrgyz Republic and instances of abuse within the Bank, a “Hotline” and an “Employee Hotline” are established.

- 5.2. The “Hotline” and “Employee Hotline” are secure and confidential communication tools designed to inform the Bank about intentions or instances of corrupt actions by Bank officials and/or employees, as well as to provide consultations.

- 5.3. The Bank accepts reports from partners, counterparties, clients, and other individuals and legal entities regarding possible instances of corruption through an interactive communication channel via the “Hotline.”

All corruption-related reports received through the “Hotline” must be forwarded to the Bank’s Security Department and Compliance Control Department for further notification of the Bank’s Management Board and Board of Directors in accordance with clauses 5.9 and 5.10 of this Policy.

- 5.3.1. The Bank accepts reports from Bank employees regarding possible instances of corruption through an interactive communication channel via the “Employee Hotline.”

All corruption-related reports received through the “Employee Hotline” must be forwarded to the Bank’s Security Department for appropriate measures. The Security Department shall promptly inform the Compliance Control Department about the received report, the progress, and the results of the measures taken for further notification of the Bank’s Management Board and Board of Directors.

- 5.4. Bank employees who become aware of violations of banking legislation committed by Bank employees during banking operations (transactions) or any instances of attempts by any individuals to induce them to commit corrupt offenses or commercial bribery are obliged to report such information to their

immediate supervisors of structural units or through the Bank’s “Employee Hotline.”

5.5. If any Bank employee has information or suspicions about possible corrupt actions or inaction by other employees, counterparties, or other persons interacting with the Bank, they must report this to their immediate supervisor or through the Bank’s “Employee Hotline.”

5.6. A Bank employee will not face sanctions (including dismissal, demotion, etc.) if they report in writing a suspected instance of corruption or if they refuse to give a bribe, engage in commercial bribery, or act as an intermediary in bribery, even if such refusal results in lost profits for the Bank or failure to obtain commercial or competitive advantages.

An employee will also not face sanctions if a report of possible corrupt offenses was made in good faith but was not substantiated during verification.

However, if such a report is made with malicious intent, such as knowingly false information aimed at slandering, gaining preferences, or avoiding liability, measures will be applied to such an employee in accordance with this Policy and the legislation of the Kyrgyz Republic.

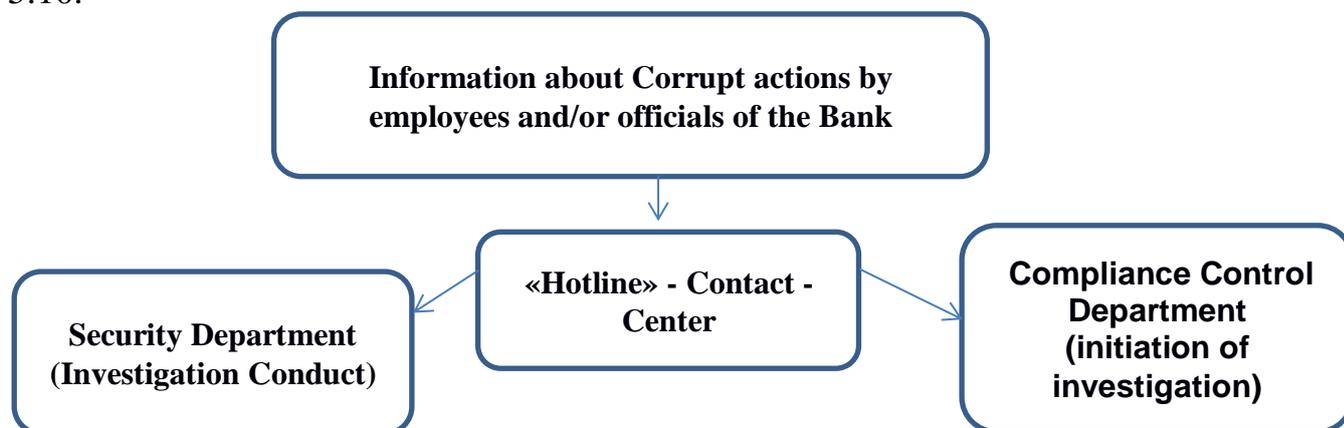
5.7. Information provided by employees, partners, counterparties, clients, and other stakeholders (individuals and legal entities) through the “Hotline” and “Employee Hotline” is considered confidential.

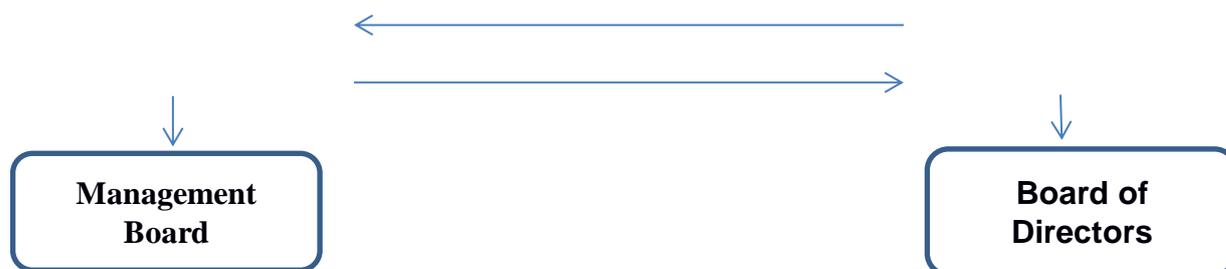
The “Hotline” and “Employee Hotline” provide employees, partners, counterparties, clients, and other stakeholders (individuals and legal entities) with the technical capability to confidentially report suspected or confirmed instances of corruption and commercial bribery.

5.8. The Bank also organizes opportunities for receiving feedback on various issues related to this Policy.

5.9. Upon receiving information about corrupt actions by Bank officials and/or employees through the “Hotline,” the Contact Center immediately forwards the information to the Security Department, which, in turn, informs the responsible Member of the Management Board. Simultaneously, when forwarding information to the Security Department, the Contact Center must inform the Compliance Control Department, which notifies the Board of Directors.

5.10.





5.11. The Security Department, as information is received, provides the Risk Management Department with details of identified instances of corrupt practices within the Bank as part of operational risks by registering the information in the Operational Risk Register.

5.12. The Bank guarantees that information received through the “Hotline” will be investigated, but the Bank does not guarantee a response to every report received through the “Hotline.”

5.13. For the Bank’s clients, signs/posters containing anti-corruption information, including the “Hotline” phone number and other possible channels for reporting corruption (e.g., email), must be prominently displayed at employees’ workstations or on information boards. This information must also be posted on the Bank’s website.

## **CHAPTER VI. ANTI-CORRUPTION MEASURES IN INTERACTIONS WITH COUNTERPARTIES**

6.1. The requirements of this Policy are taken into account when the Bank establishes contractual and other business relationships with individuals and legal entities. The Bank expects counterparties, members of their management bodies, their employees, and other persons to comply with relevant anti-corruption obligations as stipulated in the Bank’s internal documents or directly arising from the legislation of the Kyrgyz Republic, the national legislation of the country of registration and/or operations of such persons, and international law standards.

6.2. The Bank makes reasonable efforts to minimize the risk of business relationships with counterparties that have been or may be involved in corrupt activities. To this end, the Bank:

- Analyzes the reputation of potential counterparties, their shareholders, and members of management bodies regarding their tolerance for corruption, including the existence of procedures and documents similar to this Policy;
- Informs them about the Bank’s principles and requirements in the field of anti-corruption, including those established in this Policy;
- Takes into account their readiness to comply with anti-corruption principles and requirements and to provide mutual assistance in preventing corruption;
- Ensures the inclusion of anti-corruption clauses in contracts concluded by the Bank that meet the Bank’s specified criteria.

6.3. The Bank informs its partners, counterparties, and clients about the standards of conduct, procedures, and rules aimed at preventing and combating corruption.

The Bank implements the requirements of these standards during anti-corruption controls in procurement activities.

6.4. The anti-corruption standard includes the verification of procurement documentation and participants/counterparties to assess their reliability and integrity, resolve conflicts of interest, eliminate affiliations, and prevent other abuses related to positions held within the Bank.

6.5. As part of the verification of procurement documentation, control is carried out at three stages:

- **Preliminary:** Review of the draft procurement plan for the upcoming financial year or other period;
- **Ongoing:** Review of analytical and explanatory notes confirming the justification of the planned transaction;
- **Subsequent:** Review of explanatory notes justifying the conclusion of additional agreements, as well as consideration of complaints and reports from counterparties and other individuals or legal entities regarding possible instances of corruption.

As part of the verification of procurement participants/counterparties and the assessment of their reliability and integrity, efforts are made to disclose the ownership structure of counterparties, including beneficiaries (including ultimate beneficiaries), as well as information on the composition of executive bodies, their reputation, duration of market presence, involvement in corruption scandals, conflict of interest resolution, and the elimination of affiliations and other abuses by Bank officials related to their duties.

6.6. As part of the verification, the following requirements are established for procurement participants/counterparties:

- Providing information about the existence of conflicts of interest and/or relationships that are affiliative or connected with Bank officials;
- Providing information regarding the entire chain of ownership, including beneficiaries (including ultimate beneficiaries), as well as details about the structure of executive bodies.

6.7. The requirements of the established anti-corruption standards are mandatory for all participants in procurement procedures and are an integral part of the procurement documentation approved by the Bank’s internal regulations governing procurement activities.

6.8. All procurement participants must adhere to the core principles of ethical conduct during the procurement process and in the execution of procurement contracts. Participants must not be involved in corrupt or other unlawful activities.

## **CHAPTER VII. MAIN FUNCTIONS AND POWERS OF THE BANK’S MANAGEMENT BODIES, DIVISIONS, AND EMPLOYEES WITHIN THE ANTI-CORRUPTION SYSTEM**

7.1. Bank officials and employees, regardless of their position, are obliged to act in good faith and reasonably in the best interests of the Bank.

Members of the Board of Directors and the Management Board set an example of rejecting corruption and commercial bribery, demonstrating zero tolerance for corrupt behavior in any form or manifestation at all levels of the Bank.

### **7.2. Board of Directors of the Bank:**

- Defines the key strategic directions of the Bank’s anti-corruption policy;
- Exercises overall oversight of efforts to combat corruption and commercial bribery and the measures taken by the Bank in this area;
- Monitors the overall results of the implementation and application of this Policy.

### **7.3. Management Board of the Bank:**

- Participates in forming and maintaining an ethical standard of zero tolerance for any forms and manifestations of corruption and commercial bribery in the Bank, with members of the Management Board serving as personal examples of ethical and impeccable behavior;
- Acts primarily in the interests of the Bank, rather than personal interests or those of individual shareholders or Bank officials, making every effort to ensure sound and safe banking practices;
- Implements this Policy, including ensuring effective and prompt resolution of issues related to the Bank’s anti-corruption and anti-commercial bribery efforts.

### **7.4. Compliance Control Department:**

- Develops the Bank’s Anti-Corruption Policy and monitors its implementation within the Bank;
- Initiates internal investigations into offenses within the Bank;
- Notifies the Bank’s Security Department of known facts or intentions of unlawful actions by Bank employees;
- Provides consultation to Bank employees on the anti-corruption legislation of the Kyrgyz Republic and the requirements of this Policy.

### **7.5. Security Department:**

- Participates in developing the overall methodology for combating corruption and commercial bribery in the Bank;
- Prepares and conducts measures aimed at identifying and suppressing corrupt actions by Bank employees;
- Conducts internal investigations related to combating unlawful actions and commercial bribery in the Bank;
- Collaborates with the Legal Department to liaise with law enforcement authorities regarding the transfer of materials on identified instances of corrupt actions by Bank employees to hold them accountable in accordance with the legislation of the Kyrgyz

Republic;

- Conducts preventive and prophylactic work among all Bank employees and its divisions to timely prevent potential negative trends and their consequences;
- Cooperates with the Compliance Control Department to identify information about intentions or instances of corrupt actions within the Bank.

#### **7.6. Legal Department:**

- In collaboration with the Security Department, refers cases to the relevant law enforcement authorities when suspicions of commercial bribery or corruption are confirmed;
- Provides legal assistance/consultations during internal investigations (reviews) regarding violations of the legislation of the Kyrgyz Republic.

#### **7.7. All Bank Employees:**

- Must refrain from committing and/or participating in corrupt or other offenses in their own interests or on behalf of the Bank;
- Cooperate with the Compliance Control Department on all matters related to combating corruption and commercial bribery;
- Strictly comply with the requirements of anti-corruption and anti-commercial bribery legislation, this Policy, as well as professional ethics principles and ethical standards of business conduct;
- When performing their functional duties or acting on behalf of the Bank in foreign countries, must comply with the anti-corruption legislation of the Kyrgyz Republic and the requirements of this Policy;
- Must familiarize themselves with this Policy and provide written confirmation of their commitment to diligently comply with it<sup>1</sup>;
- Within the scope of their authority, fulfill duties related to combating corruption and commercial bribery in the Bank;
- Monitor compliance with the provisions of this Policy by employees under their direct supervision.

**<sup>1</sup>Note: The Human Resources Department is responsible for ensuring that Bank employees are familiarized with this Policy.**

## **CHAPTER VIII. LIABILITY**

8.1. The Board of Directors and the Management Board of the Bank ensure compliance with the fundamental principles, objectives, and requirements of this Policy within the Bank and oversee its effective implementation.

8.2. All Bank employees, regardless of their position, are responsible for adhering to the principles and requirements of this Policy, as well as for the actions (or inaction) of their subordinates that violate the established principles and requirements.

8.3. Violations of legislation related to commercial bribery and corruption, as well as the requirements of this Policy, may negatively impact the Bank’s reputation and its

relationships with clients and counterparties, and may lead to serious consequences, including fines and restrictions on business activities.

8.4. As the Bank may be subject to sanctions for the involvement of its employees and officials in corrupt activities, internal investigations are conducted for every reasonably substantiated suspicion or established fact, within the permissible measures provided by the legislation of the Kyrgyz Republic and the Bank’s internal regulations.

8.5. If an internal investigation establishes that a Bank official and/or employee has violated the requirements of this Policy and the anti-corruption legislation of the Kyrgyz Republic, they may be subject to liability measures as stipulated by the legislation of the Kyrgyz Republic.

## **CHAPTER IX. FINAL PROVISIONS**

9.1. This Policy takes effect from the date of its approval by the Board of Directors of the Bank.

9.2. The Policy is reviewed for its suitability, acceptability, effectiveness, relevance, and compliance with the legislation of the Kyrgyz Republic and international anti-corruption practices at least once a year.

9.3. Amendments and additions to this Policy are approved or declared void by a decision of the Board of Directors.

9.4. In the event that changes or amendments to the legislation of the Kyrgyz Republic result in certain articles (clauses) of this Policy conflicting with the current legislation of the Kyrgyz Republic, the Bank and its employees shall be guided by the current legislation of the Kyrgyz Republic until the relevant changes and/or amendments are made to the Policy.

9.5. All matters not regulated by this Policy shall be resolved in accordance with the current legislation of the Kyrgyz Republic.

