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**ANTI-CORRUPTION RULES**

**JSC «Altyn Bank» (Subsidiary Bank of China CITIC Bank Corporation Limited)**

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## DOCUMENT INFORMATION

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## Chapter 1. General Provisions and Glossary

1. These Anti-Corruption Rules of JSC «Altyn Bank» (Subsidiary Bank of China CITIC Bank Corporation Limited) (hereinafter – the “Rules”) have been developed in accordance with the Law of the Republic of Kazakhstan (hereinafter – the “RK”) On Counteracting Corruption (hereinafter – the “Anti-Corruption Law”), the Criminal Code of the Republic of Kazakhstan, the Code of the Republic of Kazakhstan on Administrative Offenses, the internal documents of JSC «Altyn Bank» (Subsidiary Bank of China CITIC Bank Corporation Limited) (hereinafter – the “Bank”), and international standards.

2. These Rules constitute the Bank’s primary internal document establishing the key principles and requirements aimed at counteracting corruption offenses and implementing measures to minimize and/or eliminate the consequences of corruption offenses, as well as ensuring compliance by the Bank, its employees, and other persons authorized to act on behalf of and in the interests of the Bank with the provisions of the applicable anti-corruption legislation.

3. The provisions of these Rules apply to all structural units, employees, and governing bodies of the Bank and set forth the basic requirements and standards that serve as key elements in preventing and counteracting corruption within the Bank.

4. In its activities, the Bank adheres to the principle of zero tolerance towards any form of corruption offenses. The Bank seeks to extend the principles and requirements of the Rules to all employees and expects compliance with the corresponding anti-corruption obligations.

5. The structural unit responsible for coordinating activities related to the implementation of the Anti-Corruption Rules and the owner of this document is the Compliance Department (hereinafter – the “CD”).

6. For the purposes of these Rules, the following key terms are used:

**Authorized Body of the Bank** – the Board of Directors / the Management Board of the Bank.

**Employee** – an individual engaged in employment relations with the Bank and performing work under an employment contract.

**Client** – an individual, legal entity, or individual entrepreneur who is a consumer of banking services or intends to use banking services.

**Corruption** – the unlawful use by persons holding public office, persons authorized to perform state functions, persons equated to those authorized to perform state functions, or officials of their official powers and related opportunities for the purpose of obtaining or deriving, personally or through intermediaries, material (or non-material) benefits and advantages for themselves or for third parties, as well as the bribery of such persons by providing them with benefits and advantages.

**First Line of Defense** – all structural units of the Bank, except for those belonging to the second and third lines of defense.

**Second Line of Defense** – risk management, compliance control, and other units performing control functions (including, within their competence, units responsible for security, quality control, human resources management, financial control, operational risk management, as well as the legal department and office administration).

**Third Line of Defense** – the Internal Audit Department.

**Corruption Offense** – an unlawful culpable act (action or omission) with signs of corruption, for which administrative or criminal liability is established by law.

**Counterparty** – an individual or legal entity that is a party to a contract with the Bank, including agents and partners, and that is not a Client.

**Conflict of Interest** – a situation in which a contradiction arises between the personal interests of the Bank’s officials and/or its employees and their proper performance of official duties, or the property and other interests of the Bank and/or its employees and/or clients, which may result in adverse consequences for the Bank and/or its clients, as well as a conflict between groups of shareholders, between shareholders and the Bank’s officials, between a shareholder and the workforce, concerning ownership, financial flows, and business in general, or between the Bank and its branches.

**Gift** – the transfer or promise to transfer any valuables in material or non-material form, for which there is no obligation to pay the usual price, including money, securities and other property, benefits and services of a proprietary nature (works, services, entertainment, leisure, transportation expenses, loans, discounts, provision of property for use, including housing, charitable contributions, donations, etc.), made with the intent of improper performance of official duties, i.e. on more favorable terms for the giver and/or in violation of the procedures established by the laws of the RK and/or the Bank’s internal documents.

**Anti-Corruption Efforts** – the activities of the Bank, including the activities of its governing bodies within their powers, aimed at introducing elements of corporate culture, rules and procedures established by the Bank’s internal documents, ensuring the prevention of corruption offenses, including the identification and subsequent elimination of causes of corruption (corruption prevention), as well as restricting and eliminating the causes and conditions that contribute to corruption offenses.

## **Chapter 2. Basic Principles and System of Measures to Counter Corruption Offenses**

7. The main objective of these Rules is the identification, prevention, disclosure, and investigation of corruption offenses, as well as the minimization of instances of unlawful, unethical, and corrupt behavior by the Bank's employees.

8. These Rules are aimed at fostering intolerance towards all forms of corruption and ensuring an understanding of the essence of corrupt practices, their forms and manifestations, in order to prevent and suppress situations that may, including potentially, violate the requirements of the legislation of the Republic of Kazakhstan and applicable norms of international law.

9. The key tasks of the Bank's anti-corruption system are as follows:

- 1) establishing the principles and rules of anti-corruption within the Bank;
- 2) creating effective mechanisms, procedures, control measures, and other activities aimed at counteracting corruption and minimizing the risks of the Bank and its employees being involved in corrupt practices;
- 3) promoting an anti-corruption culture within the Bank, including the prevention of falsified reporting and the use of forged documents;
- 4) embedding anti-corruption principles at all levels of the Bank's operations;
- 5) ensuring a common understanding among the Bank's employees of the principles set forth in these Rules;
- 6) informing the Bank's Authorized Body of corruption offenses and anti-corruption measures, as well as submitting to the Board of Directors an annual report on the implementation of these Rules;
- 7) applying liability measures for the commission of corrupt practices;
- 8) fostering an atmosphere of intolerance towards corruption;
- 9) identifying the conditions and causes contributing to corruption offenses and eliminating their consequences;

10) identifying, suppressing, disclosing, and investigating corruption offenses.

10. In its anti-corruption measures, the Bank adheres to the following principles:

- 1) legality and corporate ethics;
- 2) prohibition of corrupt practices in any form or manifestation;
- 3) uncompromising stance towards corruption at all levels of corporate governance;
- 4) inadmissibility of corrupt practices, including the prevention and resolution of conflicts of interest based on established Bank procedures;
- 5) openness and transparency;
- 6) systematic and comprehensive application of anti-corruption measures;
- 7) priority given to preventive anti-corruption measures;
- 8) inevitability of punishment for committing corruption offenses.

## **Chapter 3. Implementation of Preventive Measures and Anti-Corruption Actions**

11. Corruption prevention in the Bank is carried out through the application of the following main measures, among others:

- the Bank periodically identifies, assesses, and analyzes the causes and conditions that may contribute to the commission of corruption offenses in its activities as a whole and in specific business areas;
- the Bank identifies and minimizes the risks of business relationships between counterparties and Bank employees when drafting agreements, and monitors compliance with internal procurement procedures for goods and services, as well as compliance with the conditions for concluding agreements in accordance with the Bank's internal regulations;
- implementation of an anti-corruption education system to foster rejection of corruption, including through seminars and lectures with the participation of relevant structural units on anti-corruption issues.

Mandatory anti-corruption training is conducted for:

- members of the Bank's Authorized Body;
- first line of defense employees;
- second line of defense employees;
- third line of defense employees.
- the Bank promotes the development of anti-corruption culture by informing and conducting explanatory discussions with employees in order to foster an active stance of rejecting corruption;
- ensuring that Bank employees as well as third parties have the right to report known facts or suspicions of corruption offenses and other unlawful acts that contradict these Rules, other internal documents of the Bank, and the legislation of the Republic of Kazakhstan.

12. The purpose of preventing corruption within the Bank is expressed in the activities of its Authorized Bodies and employees within their powers to:

- 1) promote intolerance towards corruption in any form;
- 2) promote corporate and social responsibility in the field of combating corruption;
- 3) combat corruption practices through identification, prevention, suppression, disclosure, and investigation;

- 4) minimize and/or eliminate the consequences of corruption practices;
- 5) report corruption offenses;
- 6) hold accountable those who commit corruption practices.

13. For the effective identification, assessment, and minimization of the risks of corruption offenses, the Bank applies the following main approaches:

- 1) ensuring proper control over the management of corruption risk;
- 2) assessment and review of any information received about corruption offenses or attempts to induce employees to commit corruption offenses;
- 3) restrictions on employees of the Bank from participating in the share capital and/or management bodies of third parties while simultaneously working at the Bank;
- 4) imposing legislative and/or contractual requirements on the Bank's officials and candidates for managerial positions;
- 5) establishing rules for handling gifts and representation expenses;
- 6) establishing procedures for disclosure of information in order to prevent and manage conflicts of interest, including potential ones;
- 7) maintaining complete and accurate accounting and documentation of all Bank payments;
- 8) establishing procedures for evaluating, analyzing, and selecting counterparties, as well as rules for interacting with them;
- 9) implementing control procedures to prevent the same employee from being responsible for the development, implementation, and monitoring of anti-corruption measures;
- 10) providing protective measures for employees who report conflicts of interest or corruption offenses;
- 11) communicating the requirements of these Rules to all employees and managers of Bank divisions;
- 12) holding accountable those who commit corruption practices;
- 13) ensuring transparency and openness of the Bank's activities (subject to restrictions related to confidential information).

14. To ensure the effective functioning of the corruption risk management system, the Bank defines participants in the process based on the three lines of defense model: First Line of Defense: provided by the Bank's structural units themselves. This means that the heads of structural units are responsible for identifying, measuring, monitoring, and controlling corruption risks; Second Line of Defense: provided by units performing control functions; Third Line of Defense: provided by the Internal Audit Department, through independent audits that assess the effectiveness of the internal control system, risk management system, and corporate governance within the Bank, including with respect to corruption offenses.

#### **Chapter 4. Identification of Corruption Risks**

15. For the purposes of these Rules, corruption practices shall mean the following actions committed:

- 1) in relation to the Bank, or on behalf of or in the interests of the Bank, including in relation to public authorities and their officials, or other persons authorized to perform public functions, or persons equated to them under the Anti-Corruption Law, as well as other legal entities and their employees, governing bodies, and representatives of such legal entities;
- 2) directly or indirectly, personally or through third parties;
- 3) regardless of the purpose, including simplification of administrative, bureaucratic, or other formalities and procedures of any kind, or obtaining competitive or other advantages associated with corrupt practices;
- 4) in any form, including receiving or providing money, valuables, gifts, benefits, or other property or property-related services, as well as other proprietary rights.

16. For the purposes of these Rules, corruption risks of the Bank are primarily associated with the following corruption offenses:

- 1) bribery;
- 2) facilitation of bribery;
- 3) use by Bank employees, for themselves or in favor of third parties, of opportunities related to their official position and/or authority in order to obtain financial or other benefits/advantages not provided for by the laws of the Republic of Kazakhstan and/or the Bank's internal regulations;
- 4) other unlawful use of one's official position contrary to the legitimate interests of the Bank, for the purpose of obtaining financial or other benefits/advantages.

17. Bank employees are prohibited from engaging in any actions specified in Chapter 4 of these Rules.

18. If a Bank employee becomes aware of a violation of these Rules, or if an employee is offered conditions that would require violation of these Rules, the employee must immediately inform the direct supervisor of their division.

#### **Chapter 5. Anti-Corruption Measures in the Banking Sector**

19. Bank employees must inform their immediate supervisors or the Bank's Security Department/the CD of

any attempts by third parties to induce them to engage in corruption offenses

20. If any Bank employee becomes aware of, or suspects, possible corrupt practices or misconduct by other employees, counterparties, or other persons interacting with the Bank, such information must be reported to the Security Department/the CD through one of the following channels:

- 1) Email: [compliance@altynbank.kz](mailto:compliance@altynbank.kz)
- 2) Helpline: 8 (727) 356 58 93
- 3) Email: [SFR@altynbank.kz](mailto:SFR@altynbank.kz)

21. The Bank guarantees the confidentiality of all whistleblowers and ensures that all reported information will be reviewed within the timeframes established by the Bank. The reporting employee will not be subject to any sanctions, nor will the report negatively affect their employment relationship (including termination of employment, reassignment, or performance-related incentives), provided that the employee reported a suspected corruption incident in good faith, even if the allegations are not confirmed during the investigation. However, if a report is knowingly false and made with malicious intent—for example, to defame someone, to obtain undue advantages, or to avoid liability—the Bank will apply disciplinary measures to such an employee in accordance with these Rules and the legislation of the Republic of Kazakhstan.

### **Chapter 6. Anti-Corruption Restrictions**

22. The Bank has established the main tasks of regulation, rules, and restrictions regarding the receipt/provision of gifts and services in the course of business interactions related to the performance of official duties by employees and management of the Bank, including lists and criteria of permitted and prohibited gifts, as well as the occasions for their acceptance/provision.

23. Under no circumstances shall the provision/receipt of gifts constitute a hidden remuneration capable of negatively affecting the reputation of the employee/the authorized body of the Bank/the Bank as a whole.

24. Gifts to family members, relatives who are not family members, or other close persons of a Bank employee, given in connection with actions (inaction) performed by such employee related to his/her functional and official duties in the Bank, are not permitted.

25. When assessing the possibility of receiving/providing a gift, each employee must be guided by the following principles:

- 1) compliance of the occasion with one that is obvious and generally accepted in the Bank;
- 2) absence of the ability to influence the objectivity of decisions and/or the emergence of obligations on the part of the Bank employee, counterparty, client, or partner of the Bank in connection with the receipt/provision of a gift;
- 3) reasonableness of the value of the gift.

26. Information about the gift must be recorded and submitted to the Security Department and the CD in the form provided in Annex 1 to these Rules. Gifts that do not meet the requirements set out in paragraph 25 of these Rules must be transferred to the Bank's fund.

When providing/receiving a gift to/from a counterparty of the Bank, an Application for the provision/receipt of a gift/invitation to/from a counterparty of the Bank must be completed in accordance with Annex 2 to these Rules.

27. The Bank's representation expenses, including business hospitality, may be incurred on behalf of and at the expense of the Bank, and gifts and services may be provided or rendered on behalf of and at the expense of the Bank or received from individuals and organizations, including those having business relations with the Bank or seeking to establish such, only subject to the following criteria:

- 1) representation expenses and gifts are directly related to the legitimate purposes of the Bank's activities, for example, to the presentation or completion of business projects, successful performance of contracts, or commonly accepted holidays;
- 2) representation expenses and gifts correspond to accepted business practice and do not go beyond the norms of business communication (flowers, promotional or image-related souvenirs, etc.);
- 3) the cost of representation expenses and gifts on behalf of the Bank must be moderate and correspond to the purposes and scale of the events or the significance of the occasion, with the procedure for determining the cost carried out in accordance with the Bank's internal regulatory documents;
- 4) the purpose of representation expenses and gifts is not to serve as hidden remuneration for a service, action (inaction), connivance, patronage, granting of rights, adoption of a certain decision regarding a transaction, agreement, license, permit, or other similar decisions, or an attempt to influence the recipient for any other unlawful purpose;
- 5) representation expenses and gifts do not damage the business reputation of the Bank;
- 6) representation expenses and gifts do not contradict the principles and requirements of these Rules, the Bank's internal regulatory documents establishing the principles of professional ethics and ethical norms of business communication, other documents of the Bank, as well as the legislation of the Republic of Kazakhstan.

28. Gifts from the Bank and its employees, representatives of the Bank to third parties in the form of money, regardless of the form (cash/non-cash) and type of currency, are not permitted.

29. The Bank has established a systematic approach to charitable/sponsorship activities, defined the participants in the process, and identified the main areas of charitable/sponsorship activities.

30. Bank employees are entitled to make contributions for charitable purposes in the form of supply of goods or services, provision of technical assistance, training, or financial support. Nevertheless, the Bank takes measures to ensure that the recipient of such assistance is a bona fide charitable foundation or other organization in accordance with the Bank's internal regulatory documents, and that the Bank has no reason to believe that such a foundation or organization, according to the Bank's documents, is directly or indirectly managed for the benefit of, including, a government official or persons closely associated with him/her. Bank employees must obtain written approval from the authorized body of the Bank prior to making charitable contributions on behalf of the Bank in accordance with the Bank's internal regulatory documents.

31. The procedure for providing charitable contributions, donations, as well as sponsorship activities by the Bank shall be carried out in accordance with the Bank's internal regulatory documents. The authorized body of the Bank shall exercise control over the allocation of funds for these purposes.

32. The Bank does not participate in the activities of political and religious organizations and does not finance their activities. On the territory of the Bank, campaigning in favor of any political party or candidates, as well as dissemination by employees of their religious and political views and beliefs, is not permitted.

33. Bank employees are prohibited from presenting gifts, making contributions for political purposes, or organizing entertainment events for political parties or candidates for political office on behalf of the Bank.

#### **Chapter 7. Liability**

34. Managers and employees of the Bank, regardless of their position, bear personal responsibility for compliance with the principles and requirements of these Rules, as well as for the actions (inaction) of their subordinates who violate these principles and requirements.

35. Heads of the Bank's structural units monitor compliance with the principles and requirements of this document by the employees of their units within the scope of their competences.

36. For committing corruption-related offenses or other unlawful actions referred to in these Rules, persons may, in accordance with the legislation of the Republic of Kazakhstan, be held administratively or criminally liable. Bank employees may also be subject to disciplinary liability in accordance with the legislation of the Republic of Kazakhstan and their employment contract. Measures provided for by the civil legislation of the Republic of Kazakhstan may also be applied.

#### **Chapter 8. Final provisions**

37. Amendments and additions to the Rules shall be made as necessary in accordance with the requirements of the legislation of the Republic of Kazakhstan and the Bank's internal regulatory documents.

38. The Bank shall place these Rules in open access on the official website of the Bank, publicly declare its intolerance of all forms of corruption and corruption-related offenses, encourage compliance with the principles and requirements of these Rules by all counterparties, managers, employees of the Bank and other persons, and also promote the enhancement of the level of anti-corruption culture in society and among the Bank's employees through information and training.

39. The provisions of the Rules must be strictly observed by officials, heads of structural units, and employees of the Bank.

40. For all matters not covered by these Rules, the Bank shall be guided by the legislation of the Republic of Kazakhstan and the Bank's internal documents.

**Annex №1  
To Anti-Corruption Rules**

Gift register format

<b>Full name</b>	<b>Position</b>	<b>Date of receiving/ giving a gift/ invitation</b>	<b>From whom / to whom and relation</b>	<b>Gift Descrip tion</b>	<b>Reasons for a gift</b>	<b>Approximate cost</b>	<b>Approved/n ot approved (by whom)</b>	<b>Date</b>

**Application for approval of a gift/invitation for a public official or a foreign public official**

Full name of the Bank's counterparty and/or name of the organization	
Position of the Bank's counterparty	
Description of the gift/invitation	
The cost of the gift/invitation	
Purpose of the gift/invitation	
Worldcheck results	
Pre-Approval Details	

**Deputy Chairman of the Management Board**

**Chairman of the Management Board/  
Deputy Chairman**   
**Signature**

**Date:**

**Head of the structural division**

**Head of the structural division**   
**Signature:**

**Date:**

**Compliance**

**Compliance Department**   
**Signature:**

**Date:**