



A SUSTAINABLE TOMORROW STARTS
WITH EFFECTIVE SOLUTIONS TODAY

2025 SUSTAINABILITY REPORT



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INTRODUCTORY SPEECH

2025 was a year of serious testing and, at the same time, confident growth for Altyn Bank. We navigated this journey with perseverance and responsibility: we strengthened our financial stability, improved our risk management, and confirmed our status as a reliable partner for clients, businesses, and society. These results are the fruit of the daily, coordinated work of the Bank's entire team.

In a changing regulatory landscape and amid external challenges, we have managed to maintain a high-quality loan portfolio. We did not simply adapt to new requirements – we strengthened our internal processes, expanded our analytical capabilities, and improved the efficiency of our monitoring, enabling us to act proactively and minimize risks.

At the same time, we consistently developed our digital transformation and Private Banking, introducing new products and services to the market. Digitalization has become not only a tool for efficiency, but also a platform for increasing service accessibility, improving the client experience, and enhancing operational transparency.

For Altyn Bank, sustainable development is not a declaration, but a practical strategy.

We integrate ESG principles into our credit policy, investment decisions, and operations, support projects that promote regional economic and social development, and enhance corporate governance standards. For us, sustainability is the foundation of long-term value, creating benefits for our clients, employees, and society as a whole.

All this has been made possible by our team's unity, our customers' trust and the strategic support of our shareholders. Our key competitive advantages – a high-quality customer base, strong credit ratings, sound assets and technologically advanced services – enable us to look to the future with confidence, set new ambitious goals and continue to develop our business by offering modern banking solutions.

The human factor plays a key role in the Bank's achievements. Team spirit, high engagement, and a culture of mutual support are our greatest asset and most sustainable competitive advantage. The professionalism and commitment of our employees enable us to transform challenges into opportunities and consistently move toward our strategic goals.

I thank every employee, partner, and customer for their trust and contribution to our common cause. We remain committed to the principles of responsible business and will continue to invest in innovation, transparency, and governance quality. I am confident that Altyn Bank will continue to strengthen its position, creating sustainable value for all stakeholders.

**Sincerely,
Murat B. Baisynov
Chairman of the Board of Altyn Bank**



02 ABOUT THE REPORT

GRI' 2-3 a,b; GRI 2-5 a. Altyn Bank JSC (SB of China CITIC Bank Corporation Ltd) publishes a non-financial Sustainability Report for 2025, which systematically reflects the Bank's approaches, goals, and key results in the areas of sustainable development, corporate responsibility, and the integration of ESG-principles into strategy and operations. The report covers the period from January 1 to December 31, 2025, and discloses information on corporate governance, social responsibility, environmental efficiency, and climate risk management.

Methodology and applied standards

In preparing the Report, the Bank followed the recommendations of the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market and applied international standards for the disclosure of non-financial information. The methodology utilized the Global Reporting Initiative (GRI) for general disclosure principles, the SASB Commercial Banks (FN-CB) industry standard for assessing financially material factors, and certain provisions and recommendations of IFRS S1 and IFRS S2. The 2025 financial statements present partial metrics consistent with SASB, with a number of indicators not included due to lack of data or their immateriality to current operations. The Bank plans to expand the list of disclosed metrics as data accumulates and internal practices improve. (GRI 2-5 a)

Objectives of the report and stakeholder engagement

The report is intended to document the results and key performance indicators achieved, as well as to support an open dialogue with clients, investors, regulators, and the public. We view reporting as a tool for enhancing transparency, aligning expectations, and collaboratively seeking solutions aimed at creating a sustainable and innovative financial system that meets modern economic challenges and human needs. This document reflects the Bank's commitment to continuously improving its ap-

proaches to sustainable development and its willingness to engage in constructive dialogue. (GRI 2-3 a,b)

Approval and availability

The report was approved by the Board of Directors (Minutes No. 7 dated May 26, 2026) and is available for review on Altyn Bank's corporate website in Kazakh, Russian, and English. The document has not undergone external certification, however, it was prepared in accordance with applicable standards and internal data verification procedures. Altyn Bank intends to consistently improve the quality and completeness of its non-financial reporting, focusing on international best practices. (GRI 2-3 c)

Reporting boundaries

This report covers Altyn Bank's operations in the Republic of Kazakhstan, including local divisions and a branch network, as well as mobile and digital services providing access to banking services. The operations of the head office located outside of Kazakhstan are not included in this report, with the exception of consolidated indicators expressly stated in the relevant sections. The report reflects all key areas of activity that impact sustainable development within the Bank's operating jurisdiction in Kazakhstan: banking products and services for corporate and retail clients, operational processes, and key support functions. (GRI 2-2)



¹GRI – Global Reporting Initiative – a global initiative, unified reporting standards and recommendations that disclose non-financial performance indicators, part of the integrated reporting program

03 ABOUT THE BANK





Altyn Bank is a universal second-tier commercial bank providing a wide range of financial services to corporate and retail clients. The Bank combines local expertise with international standards, offering modern solutions for businesses and private clients and supporting the sustainable economic development of the Republic of Kazakhstan. (GRI 2-1; GRI 2-6 a; GRI 201-1)

Brief history and ownership structure

The Bank was founded in 1998 in Kazakhstan under the name of HSBC Bank Kazakhstan JSC and has gone through several stages of transformation. In 2014, a controlling stake was acquired by Halyk Bank of Kazakhstan JSC. Since 2018, the shareholder structure has been as follows:

China CITIC Bank Corporation Limited – 50.1%,
Halyk Bank of Kazakhstan JSC – 40.0%,
China Shuangwei Investment Co., Ltd. – 9.9%.

Head office shareholder of China CITIC Bank Corporation Limited is located in Beijing, Altyn Bank maintains and strengthens its position in the Kazakhstan market by expanding its product line and improving the quality of customer service.

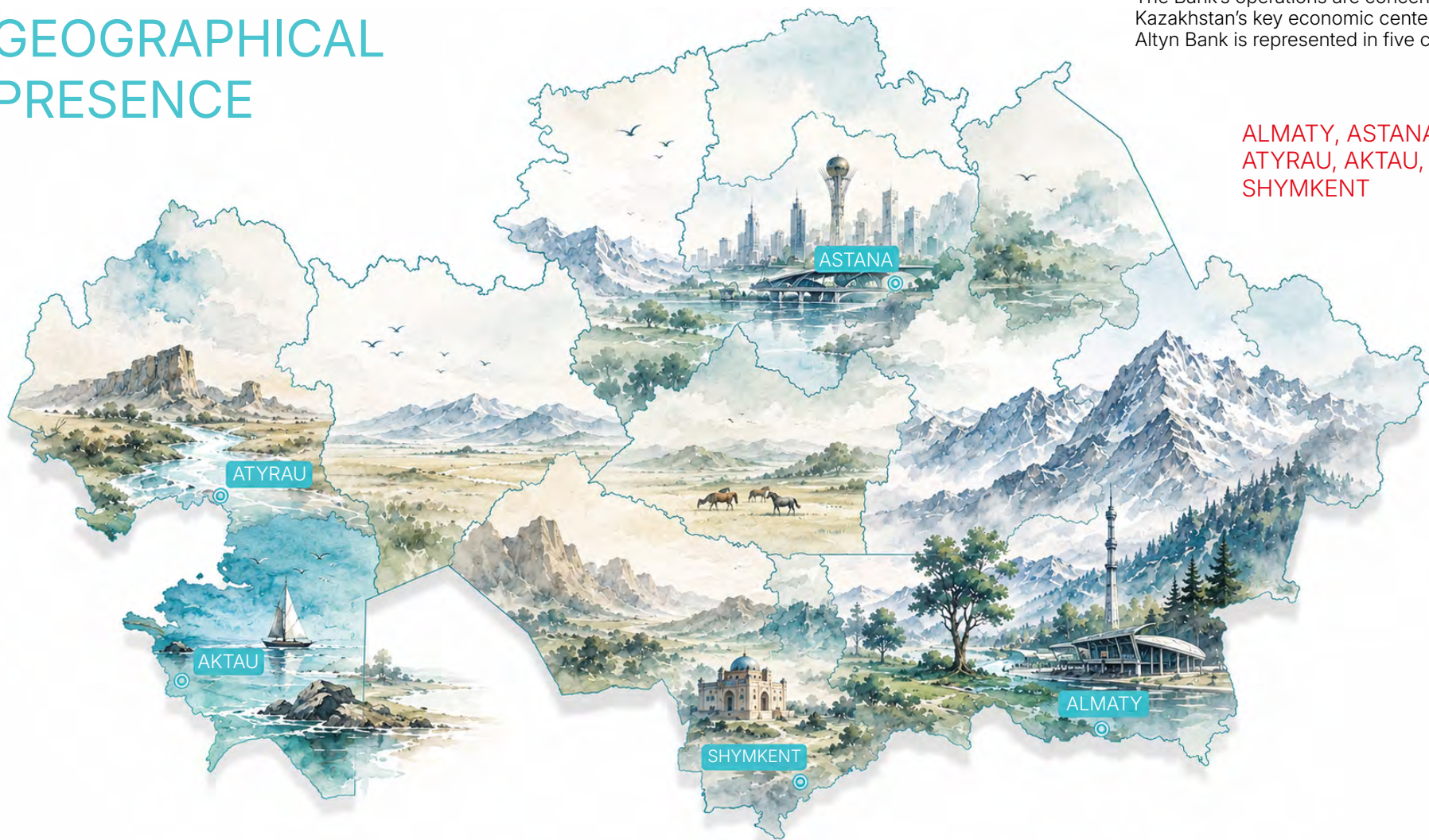
Business model and key areas of activity

Altyn Bank provides a full range of banking services: account servicing and cash transactions, corporate and retail lending, issuing and servicing letters of credit and bank guarantees, deposit taking, card products, securities and foreign exchange transactions. The Bank is actively implementing digital solutions, streamlining operational processes, and developing its Private Banking segment, focusing on individual client needs and international quality standards.

GEOGRAPHICAL PRESENCE

The Bank's operations are concentrated in Kazakhstan's key economic centers. Altyn Bank is represented in five cities:

ALMATY, ASTANA,
ATYRAU, AKTAU,
SHYMKENT



The Bank's operations are concentrated in Kazakhstan's key economic centers. Altyn Bank is represented in five cities: Almaty, Astana, Atyrau, Aktau, and Shymkent. Three branches operate in Almaty, including a Private Banking center. In Astana, the Bank also has a branch in the Astana International Financial Center (AIFC), expanding its opportunities for international financial cooperation. Thanks to the development of mobile apps and digital services, clients have convenient access to the Bank's services throughout Kazakhstan and beyond.



Commentary on the indicators and their meaning

The direct economic value created and distributed by the Bank reflects the results of its operating activities and Altyn Bank's contribution to a sustainable economic environment. These indicators demonstrate how revenue is generated and how the value created is distributed among key stakeholder groups – employees, the government, clients, suppliers, and shareholders.

In 2025, the Bank continued integrating the direct economic value indicator into its sustainability and risk-management systems. Analysis of this data is used to assess the financial sustainability and effectiveness of the business model, support management decisions on resource and investment allocation, and enhance the transparency of stakeholder engagement. Improving operational efficiency, responsible allocation of financial resources, and maintaining balanced economic growth remain the Bank's priorities. (GRI 201-1)

Direct economic value created and distributed

thousand tenge	December 31, 2025	December 31, 2024
Direct economic value created (Income)	61,827,769	58,449,292
Net interest income	53,168,723	49,292,504
Net commission income	1,038,019	748,439
Other income	7,621,027	8,408,349
Distributed economic value	21,823,982	19,341,094
Operating expenses	(14,548,768)	(17,396,066)
– including employee remuneration, taking into account social contributions and payroll taxes	(8,202,880)	(11,476,063)
– including expenses on charity and social projects	(45,178)	(100,307)
– other operating expenses	(6,300,710)	(5,819,696)
Other non-interest expenses	909,429	2,171,584
Income tax expenses	(8,184,643)	(4,116,612)
Economic value available for distribution (net income)	40,003,787	39,108,198

PROSPECTS AND COMMITMENTS

Altyn Bank will continue to improve its methods for recording and disclosing economic indicators, expand the transparency of financial flows, and strengthen the integration of non-financial criteria into management processes. We strive to ensure that the economic value created by the Bank contributes to the sustainable development of clients, employees, and society as a whole.

Bank Mission

We create opportunities that change people's lives and grow businesses. Each of our products is more than just a service, but a tool that helps clients realize their dreams, build confidence, and build their future. We work to ensure that people feel supported in making important decisions and that companies feel supported in their growth and development.

We strive to:

- create a favorable and motivating environment for employees that promotes their professional and personal growth;
- to ensure stable returns for shareholders through sustainable growth and effective business management;
- to be a responsible partner of society by supporting initiatives that promote socioeconomic development;
- to provide comprehensive financial services, building long-term relationships with clients based on trust and professionalism.

We believe that genuine care, professionalism and bold ideas are what make us truly useful.

The Bank's values are a promise we fulfill every day:

- Customer focus – we listen, understand and act in the interests of people;
- Honesty – we speak directly and keep our word;
- Innovation – we look for new ways to do more and better;
- Cooperation – we achieve goals together, value our team and partners;
- Excellence – we strive for quality that is visible and meaningful.

Our key principles of interaction with clients:

- Openness and transparency – providing complete and reliable information about products and services;
- High level of service – individual approach, efficiency and attention to detail;
- Technology and convenience – implementation of digital solutions for simplicity and accessibility of services;
- Responsibility and reliability – fulfilling obligations and ensuring the financial security of clients;
- Long-term partnership – striving for stable and trusting relationships.

Adherence to these principles strengthens the Bank's reputation and increases customer satisfaction.

Compliance and Risk Management – Altyn Bank adheres to strict compliance and risk management standards. Key focus areas:

- prevention and minimization of operational, credit and other risks;
- improving the risk management system and strengthening internal control;
- improving the efficiency of compliance processes and audit supervision;
- strict compliance with regulatory requirements and transparency standards.

These measures ensure the reliability of operations and the trust of customers, partners, and regulators.

Strategic Development – Altyn Bank is focused on sustainable growth and support for national development priorities.

Strategic objectives include:

- development of cross-border cooperation and support for clients with international operations;
- expansion of the product line for the corporate and retail segments;
- improving operational efficiency and quality of customer service;
- actively exploiting international market opportunities through initiatives and partnerships.

Innovative technologies are a key growth driver. The Bank is investing in fintech solutions, accelerating digital transformation and integrating technology into business processes. Priorities:

- increasing the convenience and speed of service;
- automation and optimization of internal processes;
- strengthening cybersecurity and data protection;
- development of mobile and remote service channels.

Team development

Our employees are Altyn Bank's top priority. We develop a HR management system, support professional training and career growth, consider individual abilities, and create a comfortable working environment. Our corporate culture is built on mutual respect, honesty, and fairness. Investments in people are the foundation of the Bank's sustainability and competitive advantage.

Stakeholder engagement channels include the Altyn-i and Altyn-to-Business mobile apps, a corporate website, specialized forums and events, media and social media publications, and digital feedback platforms. These tools allow us to meet stakeholder expectations and strengthen the Bank's position as a reliable financial partner.



04 CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

CONTRIBUTION TO THE SUSTAINABLE



We believe that sustainable development is not a declaration, but concrete actions that change people's lives and strengthen the economy.

In 2025, Altyn Bank systematically focused on six priority SDGs, translating strategic commitments into measurable projects and tangible results.

Priority SDGs:

- Good health and well-being
- Quality education
- Gender equality
- Decent work and economic growth
- Industry, innovation and infrastructure
- Climate action

Key Initiatives and their Impact (GRI 2-29, SASB² FN-CB-410a.2)

The Bank is taking a number of steps to integrate ESG principles into its operations. Below are concise yet comprehensive descriptions of key initiatives, presented in a «What's Done – Impact – What's Next» format. This format demonstrates a systematic, evidence-based, and results-oriented approach.



²SASB (Sustainability Accounting Standards Board) is a nonprofit organization that develops industry standards for companies to disclose financially material ESG information. The standards help investors assess the long-term risks and opportunities of businesses, focusing on environmental, social, and governance (ESG) issues.



» The Pro ESG project is a platform for transformation

What has been done: a cross-functional Pro ESG platform has been created, involving international consultants (IFC, PwC, McKinsey), regulators, the stock exchange, corporate partners, and the academic community (KazNU, KBTU, KIMEP).

Impact: Methodological recommendations, roadmaps, and practical cases have been developed, a foundation for integrating ESG into lending and product processes has been established.

What's next: implementing pilot solutions in lending practices and scaling best practices across all businesslines.

» First Sustainability Report (2023-2024)

What has been done: the first Report, prepared in accordance with regulatory recommendations and international practices, has been published.

Impact: Increased transparency, the Report became the basis for external assessment and dialogue with investors and regulators.

What's next: Regular annual reports with an expanded set of KPIs and external data verification.

» Integrating ESG into credit decisions

What has been done: an ESG questionnaire and "ESG Rating Instruction" have been developed, agreed upon with the Risk and Credit Analysis Departments.

Impact: ESG – factors are included in credit assessments, increasing the ability to take into account the sustainability of clients' businesses when making decisions.

What's next: Mandatory ESG assessments for large corporate loan applications, development and refinement of the ESG rating methodology, taking into account industry specifics and international best practices, regular review of criteria, and improved data quality for a more accurate assessment of client sustainability.





» Academic and expert interaction

What has been done: publications and presentations at conferences (KazNU, KIMEP), holding a Case Championship at KBTU with the participation of 14 teams.

Impact: influx of ideas and talent, scientific basis for evaluation methods and metric calculations.

What's next: regular research projects and joint educational programs.



» Training and dialogue with clients and the market

What has been done: The Bank held an information seminar for the Bank's corporate clients, dedicated to the discussion of current changes in legislation of the Republic of Kazakhstan and new requirements for banking activities.

Impact: increasing client awareness, creating a professional platform for exchanging best practices.

What's next: A series of industry workshops for clients and partners, as well as expert meetings and discussions to share experiences.



"ESG is a practical approach to managing business sustainability. Our goal is to bring together experts, businesses, and regulators to develop a unified approach to implementing ESG standards, improve data quality, and strengthen the sustainable finance market in the country," noted Kalizhan Kaliyev, Director of the ESG Department at Altyn Bank.



➤ The Bank initiated and organized the first practice-oriented conference in Almaty dedicated to the ESG agenda and the integration of sustainable development principles into Kazakhstan's financial sector. The event brought together representatives of second-tier banks, businesses, regulators, international consultants, the academic community, and ESG practitioners, and aimed to create a professional platform for dialogue, exchange of experience, and the development of joint approaches to the implementation of ESG standards.



» Environmental and social actions

What has been done: participation in the planting of Tien-Shan spruce trees in the Kok-Zhailau tract together with partners.

Impact: Concrete contribution to ecosystem restoration, employee and community engagement.

What's next: regular volunteer campaigns and projects to restore natural areas.



» Methodology, compliance and evidence base

Materiality assessment methodology: a combined approach – expert interviews, stakeholder surveys, comparative analysis of international practices, and quantitative assessment using a rating gradation.

Compliance with standards: work is carried out in accordance with GRI recommendations, regulator requirements, and taking into account IFRS approaches



to accounting for emissions (S1, S2) in the context of the Paris Agreement.

Altyn Bank is moving from initiatives to systemic ESG integration: a methodology has been developed, tools have been created, initial practices are being implemented, and the results are being documented in a public report. This approach combines a scientific basis, practical pilots, and stakeholder engagement.



05

CORPORATE
GOVERNANCE
AND ETHICS

CORPORATE GOVERNANCE AND ETHICS

GRI 2-9; GRI 2-10 a,b, GRI 2-11, GRI 2-13. Altyn Bank's activities are guided by the Constitution and legislation of the Republic of Kazakhstan, as well as the Bank's Charter and internal documents. Corporate governance principles form the foundation for the effective functioning and further improvement of the Bank's management system, ensuring compliance with high standards of transparency, ethics, and responsibility.

General model of corporate governance

Altyn Bank's corporate governance system is aimed at ensuring sustainable development, long-term growth, and protecting the interests of shareholders, clients, employees, and other stakeholders. The Bank's governance is based on the principles of transparency, accountability, responsibility, and strict compliance with regulatory

requirements. Management bodies make decisions taking into account economic, social, and environmental factors, ensuring a balance between strategic goals, risk management, and operational efficiency.

The Board of Directors exercises general management of the Bank's activities within the limits not reserved for the exclusive competence of the General Meeting of Shareholders. The Board's exclusive competence is defined by the Charter, the Corporate Governance Code, and the Regulations on the Board of Directors. Board members are elected by the General Meeting of Shareholders through cumulative voting, candidates must possess the professional and personal reputation necessary for effective service on the Board.



Composition of the Board of Directors (9 persons):

Acting Chairman of the Board of Directors:



Mr. Dunayev Arman Galiaskarovich,

Born October 7, 1966. In 1988, he graduated from the Faculty of Philosophy and Economics of the Kirov Kazakh State University, specializing in "Economist", and in 1991, he completed his postgraduate studies at Moscow State University, defending his PhD in economics. Member of the Board of Directors of Altyn Bank since June 2018.



Mrs. Shayakhmetova Umut Bolatkhanovna was born on March 19, 1969. In 1993, she graduated from the Peoples' Friendship University of Russia (formerly named after P. Lumumba) with a Bachelor's degree in Economics. In 1996, she graduated from Rutgers University, New Jersey, USA, with a Master of Business Administration (MBA) degree. She has been a member of the Board of Directors of Altyn Bank JSC since June 2018.

Mr. Wang Lei was born in September 1979. In 2002, he graduated from the Southeastern University of Finance and Economics, Institute of Finance, with a degree in Financial Management. He has been a member of the Board of Directors of Altyn Bank JSC since May 2025.

Mr. Pu Gang was born on March 26, 1973. In 1995, he graduated from the College of Finance and Economics of Shanxi Province with a degree in Public Finance. Member of the Board of Directors of Altyn Bank JSC since March 2024.

Mrs. Zhai Xu, graduated from the Central University of Finance and Economics in 1991 with a degree in Finance and from Nankai University with a degree in Global Economy in 2001. She has been a member of the Board of Directors of Altyn Bank JSC since 2021.



Mr. Lu Wei was born on October 18, 1971. He graduated from Deakin University, Australia, with a degree in "Accounting" in 2004. He has been a member of the Board of Directors of Altyn Bank JSC since May 2025.



Mr. Murat Baysynovich Baysynov was born on May 9, 1967. Graduated from the Kazakh State University named after S.M. Kirov in 1990 with a degree in Law, and from the All-Russian Financial and Economic Institute, Faculty of Finance and Economics, in 1999 with a degree in Economics. He has been a member of the Board of Directors of Altyn Bank JSC since June 2025.

Mr. Wang Guosheng was born in August 1954. He graduated from Wuhan University with a degree in International Finance and a Master of Science in Banking from the University of London, UK. He has been a member of the Board of Directors of Altyn Bank JSC since October 2018.

Mr. Ngai Ka Ching was born on July 16, 1984. He graduated from the Chinese University of Hong Kong in 2007 with a degree in Business Management. He has been a member of the Board of Directors of Altyn Bank JSC since June 2018.

The Council has four specialized committees: Strategic Planning Committee, Audit Committee, Human Resources, Remuneration and Social Issues Committee, Risk Management Committee.

Management and executive management

The Management Board is a collegial executive body that manages the Bank's day-to-day operations within the powers established by law and the Charter. The Management Board acts on behalf of the Bank and ensures the implementation of management decisions by all structural divisions.

Composition of the Board (4 persons):

Chairman of the Board: Mr. Baysynov Murat Baysynovich.

Members of the Board:



Chairman of the Management Board, Risk, Compliance and Legal Affairs Unit

Mr. Murat Baysynovich Baysynov, born May 9, 1967, graduated from the Kazakh State University named after S.M. Kirov in 1990 with a degree in Law, and the All-Russian Finance and Economics Institute, Faculty of Finance and Economics, with a degree in Economist in 1999. Chairman of the Management Board of Altyn Bank JSC since 2025.



Deputy Chairman of the Management Board of the Transaction Business and International Operations Block

Mrs. Aikimbayeva Zhanara Tuligenovna was born on March 9, 1977, graduated from the Kazakh State Law University with a degree in Jurisprudence in 1998, the Kazakh State Economic University named after T. Ryskulov with a degree in Banking in 2002, the International Business School with a Master of Business Administration (MBA) degree in Financial Management in 2012. Deputy Chairman of the Management Board - Member of the Management Board of Altyn Bank JSC since 2018.



First Deputy Chairman of the Management Board

Mr. Hu Cefeng, was born on January 2, 1980. He graduated from Beijing International Studies University with a degree in International Economics, Trade, and Finance in 2002 and from Renmin University of China with a Master of Business Administration in 2010. He has served as First Deputy Chairman of the Management Board of Altyn Bank JSC since 2019.



Deputy Chairman of the Retail Banking Management Board

Mrs. Dinara Arslan, was born on May 29, 1983. She graduated from KIMEP (Kazakhstan Institute of Management, Economics and Strategic Studies) in 2005, earning a Bachelor of Arts in International Relations and Business Administration. In 2007, she graduated from the University of International Business (UIB) with a Master's degree in Finance and Credit, and from the Moscow International Higher School of Business with a Master's degree in Financial Management. She has served as Deputy Chairman of the Management Board and Member of the Management Board of Altyn Bank JSC since 2025.

Corporate Culture of Altyn Bank is founded on principles of corporate ethics, which are enshrined in internal regulations and integrated into the Bank's sustainable development strategy. These principles shape a unified approach to business conduct, interactions with clients, partners, and employees, and contribute to the creation of a safe, respectful, and inclusive work environment.

Altyn Bank's Corporate Ethics Rules contain clear provisions prohibiting any form of discrimination, harassment, and violence in the workplace, including discrimination based on gender, age, nationality, religion, social status, health, or other personal characteristics. The Bank adheres to the principle of equal opportunity and strives to ensure every employee has fair working conditions, professional growth, and development based solely on their competencies and performance.

The Conciliation Commission, which operates on a permanent basis, plays a key role in the corporate ethics and non-discrimination management system. The Commission is comprised of representatives from various departments and management levels, ensuring an independent, objective, and comprehensive approach to reviewing complaints. Its responsibilities include analyzing complaints, appeals, and conflict situations, as well as making decisions and recommendations in accordance with the principles of fairness, equality, and confidentiality.

The Bank views the creation of an inclusive work environment as a key factor in improving operational efficien-

cy and sustainable development. Implementing non-discrimination principles promotes increased employee engagement, the development of creative and innovative potential, a reduction in staff turnover, strengthening Altyn Bank's business reputation, attracting and retaining talent, expanding its client base, and fostering harmonious and trusting relationships within the team and with external stakeholders. (GRI 205-2, GRI 406-1)

Risk management and internal control system (GRI 2-9, GRI 2-12, GRI 2-13)

The Bank is developing a risk management and internal control system in accordance with the three-line-of-defense principle, which ensures independent, comprehensive, and systemic oversight of all types of risks, including resilience to external challenges and climate factors.

The distribution of roles and responsibilities covers all levels of corporate governance:

The Board of Directors provides strategic guidance in the areas of risk management and internal control. The Risk Committee and the Audit Committee operate at this level, serving as the Board's working bodies in these areas. The Board approves and regularly updates risk management policies and reviews major transactions, related-party transactions, and transactions with affiliates, assessing their compliance with market conditions and the absence of preferential treatment.

The Bank's Management Board manages the implementation of approved risk management policies and strategies. Operational activities in these areas are carried out through specialized committees, including:

- 1) Risk Management Committee;
- 2) Asset and Liability Management Committee;
- 3) Corporate Credit Committee;
- 4) Retail Credit Committee;
- 5) Committee for work with problem assets.



Structural divisions are responsible for the initial identification and assessment of risks associated with their activities, as well as for monitoring the effectiveness of the applied control procedures and ensuring the continuity of business – processes.

Management and compliance control units ensure the operation of a system that includes the processes of identifying, assessing, monitoring, and controlling credit, market, operational, compliance and liquidity risks. These functions are managed by the Head of Risk Management and the Chief Compliance Officer.

The Internal Audit Service independently evaluates the effectiveness of the Bank's risk management, internal control, and corporate governance systems. The Service's work is aimed at confirming the Bank's practices' compliance with legal requirements, internal regulations, and sustainable development principles.

GRI 205-3, SASB FN-CB-510a.2. In 2025, the Compliance Department (hereinafter referred to as the CD) continued the consistent development of its compliance and risk management system, focusing on improving the effectiveness of control mechanisms, digitalizing processes, and strengthening the culture of compliance with legal requirements and regulatory standards.

1. Improving the regulatory framework. During the reporting period, the Bank comprehensively updated its internal regulatory documents in accordance with changes in the legislation of the Republic of Kazakhstan. These updates affected the financial monitoring system, client identification, AML/CFT risk management, internal controls, and compliance department regulations. All documents have been approved in their new versions and are applied in the Bank's ongoing operations.

2. Staff training and development

In 2025, the CD placed particular emphasis on developing employee competencies in the areas of countering the legalization (laundering) of proceeds from crime, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction (hereinafter referred to as AML/CFT/CPF) and sanctions regulation. Training events were organized aimed at:

- 1) practical application of the requirements of the AML/CFT/CFMD legislation;
- 2) recognition of suspicious transactions and behavioral indicators;
- 3) compliance with sanctions regimes and minimization of sanctions risks.

The training helped strengthen employees' personal responsibility and develop a sustainable compliance culture at all levels of the Bank.

3. Digitalization and automation

One of the key strategic directions for 2025 is the launch of the modernization and automation of the AML system. The project aims to:

- 1) improving the quality and speed of monitoring operations;
- 2) reducing the share of manual checks;
- 3) improving the analytical capabilities of the system;
- 4) improving the accuracy of identifying suspicious transactions.

In parallel, CD implemented an automated Risk Management System with the aim of integrating it into a unified digital compliance and regulatory risk management system.

The measures adopted in 2025 strengthened the Bank's compliance function, increased its readiness for regulatory changes, and ensured greater transparency and manageability of processes.



Anti-fraud and corporate ethics

During the reporting period, the Bank implemented a range of anti-fraud measures, including improving control processes and preventive transaction monitoring, strengthening customer identification, and introducing additional restrictions on high-risk business processes. These measures are aimed at preventing financial and operational abuses and protecting the interests of the Bank's clients.

To reduce the risks of financial and operational abuse, automated monitoring and analytics tools have been implemented, mechanisms for detecting abnormal behavior have been expanded, and fraud risk management procedures have been strengthened.

Particular attention was paid to educational and informational activities: Bank employees were provided with training and awareness-raising events on fraud prevention, including distance learning courses on corporate learning platforms. Information initiatives were implemented for clients aimed at raising awareness of the risks of social engineering and the safe use of banking services.

Key performance indicators for fraud prevention in 2025 include:

- 1) a reduction in detected cases of social engineering fraud by more than 80% compared to 2024;
- 2) absence of similar incidents in the second half of the reporting year;

- 3) processing more than 300 client requests regarding disputed transactions;
- 4) ensuring the return of funds to clients following interaction with government agencies of the Republic of Kazakhstan.

In the future, the Bank intends to:

- Further improve our anti-corruption programs and procedures by implementing new technologies and data analysis methods to improve internal controls.
- Expand staff training and development programs, focusing on current topics in the field of combating corruption and financial crime.
- Strengthen cooperation with regulatory and supervisory authorities, as well as with other financial institutions, to share best practices and jointly combat corruption.



Integrating sustainable development into the management system

Zhanara Tuligenovna Aikimbayeva, Deputy Chairman of the Management Board:
"ESG is becoming an integral part of strategic management. Our vision and priority, as the Bank's Management Board with the support of our shareholders is to establish systematic engagement with stakeholders, develop a common language on sustainable development issues, and provide a solid foundation for the growth of ESG practices in Kazakhstan".

Sustainability principles are integrated into the Bank's corporate governance system and decision-making processes based on the Environmental, Social, Governance, and Sustainability (ESG) Policy. ESG factors are incorporated into strategy, investment and lending activities, and risk management. The policy aims to support sustainable projects, reduce the carbon footprint, implement ESG practices in all processes, ensure transparency, and adherence to ethical standards.

Responsibility for implementing the sustainable development agenda and monitoring compliance with the Policy's provisions is assigned to the Bank's governing bodies, ensuring a systematic approach to achieving long-term sustainability and creating value for stakeholders.



06 PERSONNEL CARE

PERSONNEL CARE

Human Capital Management (GRI 2-23, GRI 2-24, GRI 413-1)

Altyn Bank is a major employer in the financial sector and operates in accordance with the laws of the Republic of Kazakhstan and the Bank's internal documents. Human capital is one of the key factors in the Bank's long-term sustainability. The HR approach is aimed at building a professional, engaged, and resilient team capable of effectively implementing the Bank's strategy amidst the transformation of the financial sector.

One of the Bank's employee principles of corporate conduct is the "Corporate Principle". Employees act on the basis of mutual support, mutual respect, and prioritizing the Bank's interests. Each employee has the right to receive comprehensive consultative, documentary, and other support from colleagues, which contributes to maintaining a healthy and productive work environment.

The Bank's social responsibility is focused on the needs and interests of all segments of the population and reflects the organization's values and mission. Interaction within the Bank encompasses all forms of communication between employees, supporting a constructive corporate culture and employee engagement.

Employment

The Bank provides stable employment and transparent working conditions for its employees. Its HR policy is

aimed at reducing employee turnover, developing internal career opportunities, and fostering long-term employment relationships.

The Bank openly discusses its commitment to development and the need to maintain a high level of corporate culture, thereby actively participating in media surveys, including an informational video on corporate culture prepared by Forbes KZ magazine in 2025. Hiring, firing and turnover indicators are analyzed on a regular basis and used in management decision-making. By the end of 2025, the Bank's headcount had grown by 4% compared to the beginning of the year. All Bank employees are based in the Republic of Kazakhstan.

The gender composition of the workforce remains balanced, with women predominating at 61%, compared to 39% for men. The average age of the Bank's employees is 34 years. The age structure is dominated by those between 30 and 50 years old (62%). The proportion of employees under 30 is 34%, while those over 50 account for 4%. The Bank does not tolerate the practice of forced labor and does not use child labor.

As of the end of the reporting period, 631 employees were employed under permanent contracts, representing 94% of the total workforce. Of those employees with permanent contracts, 59% were women and 41% were men.

At the end of 2025, 42 employees were employed

under temporary contracts, representing 6% of the total workforce. Women accounted for 83% of this category of employees, while men accounted for 17%.

By 2025, all Bank employees were employed full-time. Senior and mid-level management accounted for 11% of the total workforce, with women accounting for 45% of the management team and men for 55%.



GRI 2-7; GRI 405-1.	As of December 31, 2025	As of December 31, 2024
Total number of employees:	667	645
Permanent employment contract	625	602
Temporary employment contract	42	43
Full time	667	645
Part-time work	0	0
Number of employees by gender:		
Women	406	390
Men	261	255
Number of employees by age		
Under 30 years old	34%	32.5%
30-50 years old	62.5%	64%
Over 50 years old	3.5%	3.5%
Number of employees by position:		
Board of Directors	4	5
Other positions	663	640
The proportion of disabled people from the total number of employees:	1%	1%

In 2025, 145 new employees were hired, representing 28% of the average headcount. Over the entire period, employment was terminated with 123 employees. The employee turnover rate for 2025 was 13.9%. (GRI 401-1)

Rotation. To support the implementation and integration of the Bank's strategy, the Bank employs key employee transfers and rotations to improve performance, unlock employee potential, manage and enhance motivation, and strengthen the team of divisional managers and HR staff.



By 2025, the share of women among all Altyn Bank employees will reach 61%. The share of women in all management positions, including junior, middle, and senior management, is 46%; the share of women in management positions in the Bank's revenue-generating areas of activity is 54%.

Women's representation (GRI 405-1)	As of December 31, 2025	As of December 31, 2024
The share of women in the total number of employees	61%	60%
The proportion of women in all management positions, including junior, middle and senior management positions, as a percentage of the total number of management positions	46%	46%
The proportion of women in junior management positions, as a percentage of the total number of junior management positions	49%	48%
The proportion of women in senior management positions, i.e. at a maximum of two levels below the Chairman of the Board, as a percentage of the total number of senior management positions	18%	17%
The share of women in management positions in the Bank's income-generating areas of activity, as a percentage of all management positions in the Bank's income-generating areas of activity	54%	65%

All Bank employees are entitled to parental leave in accordance with the requirements of the Labor Code of the Republic of Kazakhstan. During parental leave, employees retain their jobs until their child reaches three years of age. Furthermore, pregnant women and women who have given birth are granted maternity leave within the timeframes established by law.

As of the end of 2025, 40 Bank employees, all women, were on maternity leave. (GRI 401-3).

The Bank encourages employees to maintain a healthy lifestyle by offering a variety of corporate fitness club offers and supports employee participation in city, regional,

and individual events dedicated to popular sports and marathons.

Bank employees actively participate in charity blood donation campaigns, as well as in campaigns dedicated to helping children from hospices and children's centers.

Remuneration and Social Guarantees

The Bank provides competitive compensation and benefits packages consistent with the market and employee performance. The compensation system supports the principles of fairness, transparency, and long-term motivation.

Personnel Assessment (GRI 404-3)

At Altyn Bank, personnel assessment is a key tool for identifying leadership potential, professional competencies, and areas for further development for employees, including managers and Management Board members. The process utilizes a balanced scorecard (BSC), which links departmental performance to bonus levels, as well as a performance and competency assessment (PCA) with three formats depending on the position. The process is transparent and supported by feedback and incentive payments. It does not apply to employees with less than three months of service, those who have been on extended maternity or sick leave, or support and technical staff.

In 2025, performance assessments for 2024 were conducted for 473 employees, representing 71% of the actual workforce. Twenty-nine percent of the workforce was not subject to assessment. The assessment covered 41% of men and 59% of women.

During the reporting period, all members of the Management Board, 100% of senior managers, 100% of mid-level managers, and 90% of specialists completed the assessment. Performance assessment is also an important tool for making management decisions, such as building a talent pool, developing personnel development programs, incentive payments, recognizing the Bank's best employees, and calculating annual bonuses.

Employee training and development (GRI 2-17, GRI 404-2)

Altyn Bank invests annually in employee training and development, establishing a budget for professional development and reimbursing the cost of external training initiated by the Bank. The training system encompasses corporate and individual programs, professional certification, master's and doctoral programs, internships, and the development of management, digital, and ESG competencies. Training effectiveness is assessed based on employee coverage and the average number of training hours per employee.

In total, 160 bank employees completed external training in 2025. The training covered topics such as: Strengthening Interdepartmental Collaboration and Increasing Motivation, Core Management Skills, Sales Skills, Conflict Management, Global Internal Audit Standards, Artificial Intelligence, and others.

In 2025, the ESG Department conducted four training sessions covering key aspects of sustainable development and ESG practices. To improve accessibility, a separate presentation was prepared with examples for each letter of the ESG principle, and a series of "Pro ESG" programs was launched on the Bank's Instagram page, featuring employees, aimed at explaining the Bank's sustainability principles.

The Pro ESG project held its 10th edition, featuring the Chairman of the Bank's Management Board. For Altyn Bank, ESG is a strategic focus and is viewed as a driver of sustainable business development. A comprehensive and systematic approach to ESG allows for consideration of risks and opportunities, as well as the engagement of all stakeholders.

The publication was presented to mid-level managers - heads of departments and directors for whom understanding the ESG agenda is important when making management decisions.





Occupational safety and health

GRI 403-1; GRI 403-2; GRI 403-3; GRI 403-6.
The Bank ensures safe and comfortable working conditions, complying with legal requirements and internal occupational safety standards. Measures are implemented to prevent occupational risks, support the physical and psychological health of employees, and promote well-being and work-life balance.

Altyn Bank prioritizes employee health, promoting healthy lifestyles and providing health insurance. In addition to mandatory workplace accident insurance, the Bank offers additional voluntary insurance, providing employee health protection ranging from 5% to 100%, depending on the insured event.

The Bank actively develops corporate sports and supports employee participation in team building activities and sports initiatives. It organizes football training sessions with coaching and field rental fees, supports table tennis lessons, hosts intercompany tournaments, and provides sports equipment for on-site training. The Bank also supports employee participation in charity running marathons in cities across Kazakhstan and is expanding its partner network of fitness clubs, offering corporate discounts for maintaining health and physical activity. (GRI 403-6)

Employee participation in charitable initiatives

On the eve of the New Year, the Bank's employees annually take part in the charity event "Charity Wish Tree", aimed at supporting children from hospices and children's centers.

As part of this initiative, employees fulfill the New Year's wishes of children who wrote letters to Santa Claus. During the reporting year, Bank employees helped fulfill 89 children's wishes, responding to various requests and needs.



07

RESPONSIBLE FINANCING

Economic impact and sustainable finance (GRI 201-1, GRI 203-1, SASB FN-CB-230a.1, FN-CB-240a.1)

In 2025, the Bank, through its Financial Institutions Division, participated for the second time in a club syndicated transaction (*this is a joint lending by a small number of banks, in which the participants distribute the loan amount, risks and income, and also jointly agree on the terms and support (transaction)*) jointly with JSC Halyk Bank, aimed at financing JSC Microcreditbank (Republic of Uzbekistan). The amount of Altyn Bank's participation amounted to 5 million US dollars.

That same year, the Bank completed its second secondary market transaction, acquiring a portion of an existing loan. The first such transaction took place in 2024, although such transactions are still rare in Kazakhstan. The total amount of the acquired portion of the loan was \$ 10 million.

The Bank continues to support and service these transactions, including administering financial flows and coordinating with syndicate participants, ensuring the proper fulfillment of all obligations under the agreements.

In 2025, syndicated loans issued with the participation of Altyn Bank in 2024 remained active and were implemented in accordance with the terms of the agreements.

During the reporting period, the Bank provided support and servicing for these transactions, including administration of financial flows and interaction with syndicate participants.

All loan obligations were fulfilled properly, and no significant violations of contract terms were identified.

The funding from these transactions was aimed at supporting the sustainable development of the agricultural ecosystem, including increasing access to finance for agricultural producers, including young farmers, and implementing solar irrigation projects that help reduce environmental impacts and improve the sustainability of the agricultural sector.

Corporate finance. (GRI 201-1, GRI 203-1, SASB FN-CB-230a.1, FN-CB-240a.1)

The Bank maintained one of the best NPL rates in the market, ensuring the high quality of its loan portfolio. In the face of legislative changes, the Bank promptly adapted internal processes, strengthening its monitoring system, analytical expertise, and work with problem assets, which enabled it to maintain financial stability and effectively manage risks.

By the end of 2025, the corporate business had achieved all key performance indicators, with targets already achieved in August 2025. This result reflects the effectiveness of established business processes, consistent customer service, and sustainable team engagement. In August 2025, Altyn Bank, together with Kazakh banks, executed the first-ever syndicated yuan loan in the Republic of Kazakhstan, provided to second-tier bank Forte Bank JSC. The transaction marked a significant step in the development of cross-border financial cooperation and confirms the high level of trust in Altyn Bank's expertise and reliability.

The Bank participates in syndicated loans in Kazakhstan and abroad, both as a lender and an agent. As part of its corporate finance program, it also participated in a syndicated loan for the construction of a cascade of small hydroelectric power plants on the Grand Andijan Canal.

The project is categorized as a renewable energy project and contributes to the development of sustainable infrastructure and the reduction of the carbon footprint of the energy sector.



Treasury Operations (GRI 201-1, SASB FN-CB-230a.2, FN-CB-550a.2)

As of the reporting date, the Bank did not issue or invest in specialized “green” or social financial instruments. However, treasury operations are aimed at ensuring the Bank’s financial stability and reliability, maintaining sufficient liquidity to meet its client obligations on a timely basis, and ensuring operational stability in a changing market environment.

Treasury operations:

- facilitate liquidity risk management;
- ensure the Bank’s ability to meet its payment obligations;
- focused on efficient management of assets and liabilities rather than speculative operations.

Securities purchase transactions are carried out primarily to maintain the Bank’s liquidity and financial stability, with a priority on reliability and risk mitigation. Such transactions are conducted through international and Kazakhstani financial institutions that comply with the Bank’s internal risk management and compliance control system. All counterparties undergo preliminary verification as part of KYC (Know Your Customer) procedures. AML (Anti-Money Laundering) and counterparty risk assessments, and are also subject to a system of established limits.

Operations on the foreign exchange market are primarily hedging in nature and are aimed at reducing currency risks and meeting the needs of clients.

The foreign currency portion of the portfolio held for sale increased by 15%, and accrued interest income grew by 27%. Provisions remained minimal, reflecting the low level of financial and operational risks.

During the reporting period, the Bank continued to improve its corporate deposit management processes. Tax accounting processes were automated, including the determination of accounts and income tax rates, as well as the generation of corporate tax reports. At the same time, the notification process for deposit applications was automated, eliminating the need for manual notifications, speeding up approvals, and reducing operational risks. These changes increased data accuracy and transparency, reduced the volume of manual transactions, and strengthened corporate governance, contributing to the Bank’s sustainable development.

Quality of services and customer service (GRI 418-1, SASB FN-CB-220a.1, FN-CB-220a.2, FN-CB-230a.1, FN-CB-230a.2, FN-CB-410a)

Altyn Bank views service quality and customer protection as key elements of sustainable development. The Bank’s approach is based on the principles of responsible financial services, transparent terms, and fair customer relations.

In order to ensure the quality and security of banking services, the Bank:

- complies with the requirements of legislation and regulations;
- implements internal quality control procedures for products and services;
- ensures transparency of the terms of banking products and tariffs;
- ensures the protection of personal and financial data of clients;
- applies measures to prevent fraud and operational risks.

Informing clients

The Bank provides clients with complete and reliable information about the characteristics of banking products and services, including terms, risks, and costs, including through official communication channels and contractual documentation.

Inquiries and feedback

The Bank has mechanisms in place to handle customer requests and complaints, aimed at promptly identifying and eliminating potential service quality issues.

All customer requests are processed in accordance with established procedures, deadlines, and principles of objectivity.

Cases of violations

During the reporting period, the Bank did not record any confirmed cases of significant violations of requirements related to the safety and quality of services provided.

Number of clients in Altyn Bank:

Client type	December 31, 2025	December 31, 2024
Retail customers, of which:	856,758	407,193
Private bank	1,687	1,508
Corporate clients	1,163	1,117

Altyn Bank's client base demonstrated significant growth in 2025, demonstrating a high level of trust in the Bank and its services. Among these, private banking a segment providing customized financial solutions - holds a special place.

An important part of the corporate portfolio is 13 state-owned non-financial organizations and 291 small businesses, which underlines the Bank's importance in supporting both large government structures and small and medium-sized businesses.

The Bank is implementing a range of measures and initiatives aimed at maintaining a high level of service quality and improving customer service.

Development of card products and digital services

During the reporting period, the Bank consistently developed its line of card products and digital services aimed at increasing customer value, financial accessibility, and the convenience of cashless payments.

Launch of a co-branding card with NC Kazakhstan Temir Zholy JSC – Altyn Express

As part of a strategic partnership with the national carrier, a co-branded Altyn Express card was launched, aimed at supporting population mobility and encouraging cashless payments. The card provides customers with a total benefit of up to 25% when purchasing railway tickets from Kazakhstan Temir Zholy, including a 20% discount and 5% cashback. The product contributes to improving the accessibility of transport services, increasing customer loyalty, and developing the Bank's ecosystem-based solutions.

Expansion of the premium card product line

In order to meet the needs of wealthy clients, the Bank launched premium VISA cards Signature and Master-Card Black Edition. The new products offer an expanded range of services, including enhanced security, premium privileges, international support services, and loyalty programs. The launch of these cards strengthens the Bank's position in the premium segment. banking and contributes to improving the quality of customer service.

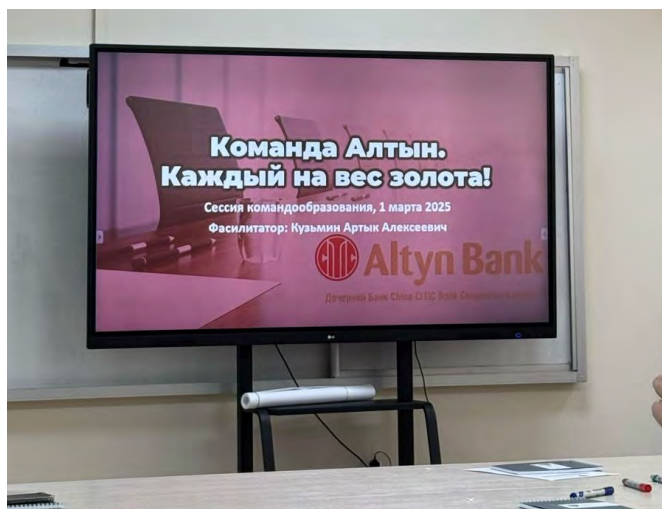
Launch of a corporate VISA card Business

To support small, medium and corporate businesses, the Bank introduced a VISA card Business, designed to optimize companies' operating and representative expenses. The product ensures payment transparency, convenient cost control, and increased financial discipline, facilitating the development of entrepreneurship and sustainability for the Bank's business clients.

As part of the digital transformation, digital map services have been significantly improved:

- The ability to top up cards via the Altyn-i mobile application has been implemented, which has increased the convenience and accessibility of financial transactions;
- 3D has been implemented Secure for UPI cards, which enhances the security of online payments and protects customers from fraudulent transactions;
- Display of information on card blocks and limits has been ensured in Altyn-i, which has increased the transparency of card product management and the level of customer trust.

The implemented initiatives contribute to the development of cashless payments, the reduction of operational costs, increased financial inclusion, and the strengthening of the Bank's sustainable digital ecosystem.



Employee training:

To improve the quality of customer service, the Bank implements programs for training and development of professional skills of staff.

To enhance customer service competencies, the Bank conducts systematic training programs, including the **"Altyn Team: Everyone's Worth Their Weight in Gold"** training, which is aimed at developing teamwork, professional skills, and effective interaction with both external and internal clients.

Feedback from customers:

We have mechanisms in place to receive and review customer complaints and suggestions, allowing us to respond promptly to emerging issues and improve service satisfaction.

The Bank uses comprehensive methods to assess customer satisfaction and service quality. Various tools are used, including satisfaction surveys, complaint and suggestion analysis, and internal service quality metrics. The collected data allows the Bank to obtain objective information about the customer experience and promptly adapt strategies and processes to improve service quality.

249 companies participated in the survey (153 of which were clients responsible for multiple companies within their group). By comparison, 70 companies participated in the previous 2021 survey.

The survey results showed a high level of customer satisfaction:

- 91% of clients are highly satisfied with the work of Corporate Service managers;
- 76% of respondents noted the individual approach and professionalism of the Bank's employees as key strengths;

- 81.05% of corporate clients highly rated the Altyn to Business online banking system for its simplicity and convenience;
- 78.43% of clients emphasized that attractive deposit rates and convenient operating hours are important when placing funds through Treasury Operations;
- 94.12% of survey participants noted that it is important to them that the Bank adheres to the principles of sustainable development and social responsibility.

Thus, the combination of personalized service, convenient online banking for legal entities, favorable terms, and adherence to ESG principles has led to 97.4% of clients being willing to recommend the Bank to their business partners.

Innovation and technological development

The Bank actively implements innovations and modern digital solutions, improving the quality of customer service and the efficiency of internal processes.

During the reporting period, the following key initiatives were implemented in the remote banking system for legal entities:

- **Digital services and mobile banking:** launch of the API (Application Programming Interface - a special interface that allows you to integrate your accounting systems (e.g., accounting/ ERP) with banking services. It automates the process of exchanging data between programs, eliminating the need for manual data entry and logging into online banking) for integration with external systems, a redesign of mobile banking and the availability of IBLE (Internet banking for legal entities) in Chinese, the ability to open additional accounts for legal entities online.
- **Process automation:** automation of all types of deposits, updating of contact information and actual address, currency conversion with contract selection and display of individual rates, automatic blocking of accounts

without activity, generation of certificates on signatories, automation of notifications about the date of updating the Know Your Client Questionnaire.

- **Analytics and new products:** downloading reports on accounts and transactions for analytics, implementing a directory of sanctioned banks, changing the logic for displaying loan debt, launching the “Financial Institution Loans» and «Factoring with Regression” products.
- **International payments:** implementation of SWIFT GPI – a service for fast and transparent transfers for legal entities with the ability to track the status of outgoing transfers in real time.

These initiatives enable the Bank to increase its technological maturity, improve the customer experience, and provide reliable, fast, and convenient financial services.

Digital platforms and mobile services: A significant achievement in the development of our Bank’s digital services:

- Altyn Bank clients can now pay for purchases via QR codes through Halyk Bank and Kaspi POS terminals using the Altyn-i app. Altyn Bank has also joined the unified interbank QR payment system and was one of the first to

implement the unified QR code for issuance, confirming its technological readiness.

- The Bank launched a Travel section in its mobile app for its clients, and, in partnership with Passenger Transportation, launched the Altyn Express co-branded travel card.
- Opportunity to purchase commercial real estate for the individual entrepreneur segment - The first commercial mortgage in Kazakhstan, which we implemented jointly with BI Group.
- A new Private Banking office, Status, has opened in a prestigious and convenient area of Almaty.
- During the reporting year, Altyn Bank launched one of the largest LED screens in the city, located on the façade of our head office. It now displays the most relevant advertising and information about the Bank’s products.

Ensuring cybersecurity and data protection. (GRI 418-1, SASB FN-CB-230a.1)

In 2025, the Bank ensured the protection of clients’ personal and banking data as one of the key elements of sustainable development and stakeholder trust. The Bank operates in accordance with the requirements of the legislation of the Republic of Kazakhstan, as well

as applicable international and industry standards in the field of information security. The Bank has an information security management system in place, internal regulations have been approved and regularly updated, and roles and responsibilities for ensuring cybersecurity have been defined.

To protect information, a range of technical and organizational measures is implemented, including multi-level protection of information systems, monitoring and response to information security incidents, data access control, and backup.

Particular attention is paid to the protection of customer data and payment information, including compliance with the requirements of the international PCI DSS standard version 4.0.1 and the use of cryptographic means of information security.

In 2025, there were no incidents related to the leakage of personal customer data. The Bank also implements measures to improve employee cyber awareness and cyber risk management, which helps reduce operational and reputational risks and improve the sustainability of the Bank’s operations.

08

ENVIRONMENTAL RESPONSIBILITY

The Bank's activities are not associated with significant environmental risks and do not have a significant negative impact on the environment. The Bank adheres to the precautionary principle and implements internal policies and procedures for environmental risk management, including monitoring compliance with legislation. Environmental factors are taken into account when making decisions on financing and operating activities. During the reporting period, no violations of environmental legislation were recorded, and no penalties were applied.

During the reporting period, the Bank continued to monitor energy and material resource consumption, as well as waste generation. To assess its climate impact, greenhouse gas emissions were calculated for Scope 1 (direct emissions from the Bank's own sources) and Scope 2 (indirect emissions associated with the consumption of purchased electricity and heat).

The Bank performed these calculations independently based on internal data and applicable methodological approaches (Greenhouse Gas Protocol). No independent third-party verification of these calculations was performed during the reporting period. In some leased premises, utility consumption is allocated proportionally to the occupied area or is paid at a fixed rate under the lease agreements. Therefore, the Bank's actual utility consumption at individual properties can only be estimated, and the ability to directly influence its reduction is limited. (GRI 303-5)

Energy consumption and energy efficiency

Indicator	2024	2025
Electricity (purchase), kW-h	1,759,862.51	1,985,922.04
Thermal energy (heating), Gcal	1,102.56	938.02
Gasoline (fuel and lubricants), l	39,755	34,937

Dynamics of indicators:

- Electricity consumption increased by 12.8%.
- Heat energy consumption decreased by 14.9%.
- Gasoline consumption decreased by 12.1%.

Changes in the indicators are due to the dynamics of the Bank's operating activities, as well as the implementation of measures to optimize the use of official vehicles. (GRI 302-1, SASB FN-CB-130a.1)

GRI 303-5, SASB FN-CB-140a.1. **Water and Waste water**

Indicator	2024	2025
Hot water, Gcal	33.11	77.31
Cold/chemically purified water, m ³	4,464.05	3,868.88
Sewage, m ³	5,060.98	4,572.89

GRI 306-3. **Waste**

Type of waste	2024	2025
Waste paper, tons	2.88	1.9

The generated waste is transferred to specialized organizations for disposal and recycling.

Greenhouse Gas Emissions³

Scope 1 (direct emissions).

Source: gasoline combustion in company vehicles.

Year	Emissions, t CO ₂
2024	89.09
2025	78.30

The 12% reduction is due to reduced fuel consumption.

Scope 2 (indirect emissions from purchased energy).

Source: purchased electricity and heat.

Year	Emissions, t CO ₂
2024	1,435.40
2025	1,524.05

6.2% increase in total indirect Scope 2 emissions is mainly due to an increase in electricity consumption, despite a decrease in heat consumption.

The Bank will continue to implement measures to improve operational efficiency, digitalize processes, and enhance its environmental accounting system.
(GRI 305-1, GRI 305-2, SASB FN-CB-110a.1)



³Detailed calculations of greenhouse gas emissions are presented in files located in the Data folder .

09 GRI STANDARDS INDEX

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10 SASB STANDARDS INDEX (COMMERCIAL BANK, FN-CB)

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Contact information: Address: Republic of Kazakhstan, A05A1B9, Almaty, Abay Ave. 109 "B"
Website: <https://altynbank.kz/>
Contact center: +7 727 356-57-77