

A P P R O V E D

by Decision of Extraordinary
General Meeting of Alliance Bank Joint Stock
Company Shareholders
(Minutes No.02/14 dated 30 December 2014)

CODE

of Corporate Governance

Almaty city

2014

This Corporate Governance Code of ForteBank JSC (hereinafter the “Code”) has been developed in accordance with Republic of Kazakhstan laws, the Charter of ForteBank Joint Stock Company (hereinafter the “Charter”), based on existing international experience in the field of corporate governance, recommendations of the Basel Committee on Banking Supervision “Improvement of Corporate Governance in Credit Institutions”, best Kazakhstan corporate governance practices, advanced business practices and rules of business ethics, and is a set of rules governing the relations of ForteBank Joint Stock Company (hereinafter the “Bank”) with its shareholders, as well as between bodies and officers of the Bank.

The amendments introduced throughout the text have been introduced according to the resolution of the Extraordinary General Meeting of Shareholders of the Bank date October 16th, 2020 (minutes of the Meeting № 02/20).

Article 1. General Provisions

1. The Bank considers corporate governance as a means to improve the efficiency of its operations, improve reputation, save costs for capital raising, increase its market value.
2. The Bank hereby accepts the provisions of this Code and follows them in an effort to increase its force of attraction to existing and potential investors through the protection of interests of all Bank shareholders, to ensure transparency of the Bank activities and improve the effectiveness of activities of the Board of Directors of the Bank (hereinafter the “Board of Directors”) and the Management Board of the Bank (hereinafter the “Management Board”).
3. The standards set forth in this Code are additional and/or detailing with respect to the corporate governance standards established by Republic of Kazakhstan laws and the Charter.
4. The Bank is governed by the provisions of this Code (either directly or by analogy) in relation not only to its shareholders, but also with other parties concerned - its customers, partners, contractors, employees, government officials performing in relation to the Bank regulatory and supervisory functions, other parties concerned.

Article 2. Principles of Corporate Governance in the Bank

1. Corporate governance in the Bank is based on the principles of fairness, honesty, responsibility, openness, transparency, professionalism and competence.
2. Principles of Corporate Governance contained herein focus on building trust in the relationship in the area of corporate governance in the Bank, and are the ideological basis for all subsequent provisions of this Code.
3. Corporate governance in the Bank is based on the following principles:
 - 1) protect the rights and interests of Bank shareholders;
 - 2) efficient governance;
 - 3) accountability and responsibility;
 - 4) transparency and objectivity of disclosure of information about the Bank and activities thereof;
 - 5) legitimacy, ethics and observance of human rights;
 - 6) efficient dividend policy;
 - 7) efficient personnel policies;
 - 8) environmental protection;
 - 9) actively promote the development of the financial system of the Republic of Kazakhstan.

sub-clause 5 of clause 3 of the Article 2 was amended as per the resolution of the General Meeting of Shareholders of the Bank dated April 29th, 2025 (minutes of the Meeting № 01/25).

Article 3. Principle of Rights and Interests of the Bank Shareholders

The principle of protecting the rights and interests of Bank shareholders implies that the Bank provides realization of the following fundamental rights of its shareholders (without regard to the special rights of major shareholders of the Bank as determined by Republic of Kazakhstan Law “On Joint Stock Companies”):

- 1) the right of ownership, use and disposal of their shares of the Bank;
- 2) the right to receive information about the Bank and its activities in the amounts, within the time and in the manner established by the Republic of Kazakhstan laws and internal documents of the Bank;

Sub-clause 2 of the first paragraph of Article 3 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

- 3) the right to participate in the management of the Bank by participation in General Meetings of Bank Shareholders, speeches and voting on issues thereof;
- 4) the right to offer to General Meeting of Bank Shareholders the agenda whereof includes an issue on election of a member or members of the Board of Directors, the list of candidates for such election;
- 5) the right to receive the share of profit of the Bank in the form of dividends on shares of the Bank held by them;
- 6) other rights as determined by Republic of Kazakhstan laws and the Charter.

Article 4. Principle of Efficient Governance

The principle of efficient management involves the following:

- 1) Implementation by the Board of Directors of strategic management of the Bank, assurance of efficient control by the Board of Directors over the activities of the Management Board, as well as accountability of the Board of Directors to the General Meeting of Bank Shareholders;
- 2) management policy applied in the Bank has long-term objectives and aims to increase the shareholder value of the Bank;
- 3) long-term development strategies of both individual business activities of the Bank and the Bank as a whole are developed, approved and, if necessary, updated on a regular basis;
- 4) the Bank monitors perception and evaluation of the Bank's strategy by its shareholders;
- 5) remuneration of Bank management depends, among others, on achieving long-term development and strategic objectives;
- 6) active cooperation of the Management Board with its shareholders, customers, partners, in order to increase the Bank's assets, increase profitability of implemented banking transactions and maintain Bank's profitability.

Article 5. Principle of Accountability and Responsibility

The principle of accountability and responsibility involves the following:

- 1) The Board of Directors is accountable to the General Meeting of Bank Shareholders and bears fiduciary responsibility to the shareholders of the Bank for decisions made;
- 2) The Management Board is accountable to the Board of Directors and the General Meeting of Bank Shareholders and bears responsibility to them for rational use of resources and assets of the Bank.

Article 6. Principle of Transparency and Objectivity of Disclosure of Information about the Bank and Activities Thereof

1. The principle of transparency and objectivity of disclosure of information about the Bank and its activities is aimed at obtaining by external users (including shareholders, customers, contractors, partners of the Bank, existing and potential investors, rating agencies, stock exchanges whereat the the Bank securities are listed, government bodies performing regulatory and supervisory functions with regard to the Bank, the media) of available, relevant, accurate and understandable information about the Bank and activities thereof in a necessary and sufficient volume.

Well-balanced transparency is intended to ensure the transparency of corporate governance of the Bank, except for the issues that are of commercial, service, banking and other secret protected by law.

2. The principle of transparency and objectivity of disclosure of information about the Bank and activities thereof involves the following:
 - 1) shareholders and investors of the Bank (including potential ones) are provided with free and unhindered access, in accordance with the Republic of Kazakhstan laws and the internal documents of the Bank, to the information about the Bank and its activities, which is necessary for shareholders and investors to make appropriate decisions;

Sub-clause 1 clause 2 Article 6 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

 - 2) the Bank shall promptly disclose information on main results, plans and prospects of its activities which may significantly affect the rights and legitimate interests of Bank shareholders and investors;
 - 3) the Bank regularly discloses information on material corporate actions and/or events in its activities, being careful to protect confidential information the list whereof is determined by the Board of Directors.

Article 7. Principle of Legitimateness, Ethics and Observance of Human Rights

The principle of legitimacy, ethics and observance of human rights implies the following:

- 1) The Bank operates in strict accordance with the applicable laws, the Charter, business practice, rules of business ethics, contractual obligations and the internal documents of the Bank;

Sub-clause 1 of the first paragraph of Article 7 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

- 2) The internal documents of the Bank have been developed on the basis of applicable laws with regard to business practice and rules of business ethics;

Sub-clause 2 of the first paragraph of Article 7 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

- 3) The Bank may engage independent legal advisers with regard to issues of application of foreign and Kazakhstan laws;
- 4) The Bank seeks to avoid corporate conflicts.

Title of the Article 7 and the preamble of the first paragraph of the Article 7 were amended as per the resolution of the General Meeting of Shareholders of the Bank dated April 29th, 2025 (minutes of the Meeting № 01/25).

Article 8. Principle of Efficient Dividend Policy

The principle of efficient dividend policy implies the following:

- 1) The dividend policy of the Bank ensures transparency of the mechanism for determining the amount of dividends on common shares of the Bank, the order of accrual and payment thereof, and is aimed to improve welfare of Bank shareholders and increase its capitalization;
- 2) Accrual and payment of dividends on common shares of the Bank are based on reliable information on the basis of actual state of the Bank's business regarding conditions for availability of such accrual and payment.

Article 9. Principle of Efficient Personnel Policy

The principle of efficient personnel policy implies the following:

- 1) corporate governance in the Bank is built with due account for the necessity to protect the rights of Bank employees stipulated by Republic of Kazakhstan laws, and is aimed at development of partnerships between the Bank and its employees in solving social issues and regulation of labor conditions;
- 2) one of the main aspects of the Bank's personnel policy is to preserve jobs, improve working conditions at the Bank, comply with standards of social protection of Bank employees and further increase the Bank's social responsibility to its employees;
- 3) corporate governance in the Bank is aimed at creating favorable atmosphere in the workplace and professional development of Bank employees;
- 4) The Bank shall take effective measures to further improve the system of personnel administration and development.

Article 10. Principle of Environmental Protection

The principle of environment protection involves the following:

- 1) in the course of its business, the Bank provides careful and rational attitude to the environment;
- 2) the internal documents of the Bank reflect provisions which prohibit funding projects that harm the environment, human health and life.

Sub-clause 2 of the first paragraph of Article 10 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18)

Article 11. Principle of Active Promotion to Develop the Financial System of the Republic of Kazakhstan

The principle of active promotion to develop the financial system of the Republic of Kazakhstan implies the following:

- 1) The Bank is a member of the Financial Institutions' Association of Kazakhstan;
- 2) The Bank is an initiator or an active participant of the initiatives on improvement of legislation and law enforcement in the financial sector.

Article 12. Enforcement of Rights of Bank Shareholders

1. In order to ensure the rights of its shareholders as determined by Republic of Kazakhstan laws, the Bank:
 - 1) provides a safe, secure and reliable accounting of property rights of Bank shareholders on shares issued to them by using the register system with regard to Bank shareholders maintained by one and only specialized organization in Kazakhstan - the registrar;

- 2) does not prevent its shareholders at disposal of their Bank shares (including the alienation of those shares);
 - 3) applies convenient for the Bank shareholders procedure to realize their pre-emption rights with regard to placed shares or other securities of the Bank convertible into its shares, or previously bought own shares or other securities of the Bank that are being sold and convertible into its shares;
 - 4) timely informs its shareholders in accordance with the Charter on the date, time and venue of the General Meeting of Bank Shareholders;
 - 5) applies convenient for Bank shareholders procedure to realize their right to call the General Meeting of Shareholders or the Board of Directors, and make proposals to amend the agenda of the General Meeting of Shareholders, to nominate candidates for election to the Board of Directors, to demand performance of audit of the Bank by an audit organization at the expense of the Bank shareholder;
 - 6) gives the Bank shareholders motivated answers to their written requests on activities of the Bank in accordance with article 20 of the Bank Charter.
2. Key measures to enforce the rights of shareholders to participate in governance of the Bank and to obtain information on its activities are stated in the following articles of this Code.
 3. The Bank expects its shareholders not to abuse the rights granted to them and not to carry out activities aimed to cause harm to other shareholders of the Bank and/or the Bank itself.

Article 13. General Meeting of Bank Shareholders

1. The procedure of call, preparation and holding of the General Meeting of Bank Shareholders is regulated by Republic of Kazakhstan laws.

Bank plans and carries out the steps to call and prepare to the General Meeting of Shareholders in such a way to provide its shareholders with possibility so that they can prepare promptly to take part in the Meeting, and develop reasonable opinions on the agenda of the General Meeting of Shareholders.
2. To enforce the rights of the shareholders to participate in governance of the Bank by their participation in General Meetings of Bank Shareholders, the Bank uses such measures as:
 - 1) election of members of the Bank Counting Commission from among individuals - the Bank shareholders and representatives of Bank shareholders and/or from among employees of the Bank;
 - 2) application of procedure to register participants of the General Meeting of Shareholders not preventing the shareholders and representatives thereof to take part at the meeting (with due account for specifications set in para.4 hereof);
 - 3) application of the provisions to hold the General Meeting of Shareholders, which guarantees equal opportunity of the Meeting participants to take part in discussion of the agenda, to express their opinions and ask questions on the agenda of the Meeting.
3. At registration of participants of the General Meeting of Bank Shareholders there is a rule that any shareholder of the Bank, who wishes to participate at General Meeting of Shareholders, shall have such opportunity, and on the basis of this rule the registration procedure is implemented as follows:
 - 1) the registration is implemented at the place and on the day of the General Meeting of Shareholders;
 - 2) time allowed for registration is sufficient to register all interested shareholders of the Bank and representatives thereof.

4. The Bank seeks to eliminate any doubts on accuracy of findings finalizing at the General Meeting of Shareholders and to that end provides a finalizing of findings and announcement before the end of the Meeting.

Article 14. Board of Directors

The number of members of the Board of Directors shall promote constructive discussion, making quick and informed decisions, as well as the efficient operation of the Board of Directors.

Article 15. Management Board

1. The number and personal composition of the Management Board is determined in such a way as to ensure productive and constructive discussion of the issues, and making of timely and informed decisions.
2. A person elected to be the Chairman or member of the Management Board shall have the qualifications, skills, personal qualities and reputation necessary to exercise reasonable, fair and efficient management of the current activities of the Bank.

Clause 2 Article 15 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

3. Management Board members should refrain from actions that may lead to a conflict between their interests and interests of the Bank, and in case of such a conflict, they are obliged to notify the Board of Directors.
4. Remuneration for the Chairman and members of the Management Board approved by the Board of Directors shall comply with their skills, responsibility and take into account their real contribution to the performance of the Bank.
5. Members of the Management Board shall bear responsibility for improper performance of their duties and for breach of the provisions on use of confidential, official and insider information about the Bank for personal interests and the interests of third parties.
6. The Management Board recognizes its responsibility to shareholders, customers, partners, employees and other parties, and believes its main goal is conscientious and competent performance of duties ensuring efficient development of the Bank.

Article 16. Interaction between the Board of Directors and the Management Board. Corporate Secretary of the Bank

1. Efficient corporate governance requires an open dialogue between the Board of Directors and the Management Board. For this purpose, the Bank implements clearly determined procedures in order of provision to the Board of Directors of periodic reports (information) by the Chairman of the Management Board and the Management Board. A key role in the organization of this process is played by the Corporate Secretary of the Bank (hereinafter the "Corporate Secretary").
2. The Corporate Secretary plays a special role at compliance with the procedure of preparation and holding of Meetings of the Board of Directors, disclosure and provision of information about the Bank, since non-compliance with those procedures entail most of the violations of the rights and interests of shareholders.
3. The Corporate Secretary shall ensure due consideration by the relevant authorities of the Bank of shareholders' appeals and resolution of conflicts related to the violation of their rights. Control over timely consideration of such appeals by bodies of the Bank is assigned to the Corporate Secretary.
4. The Corporate Secretary is responsible for organizing the consultation to all members of the Board of Directors on all matters within his competence.

5. The status, functions and responsibilities of the Corporate Secretary of the Bank are determined by the Regulation on Corporate Secretary.

Article 17 was omitted as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

Article 18. Disclosure of Information about the Bank

1. The Bank shall ensure timely disclosure of the information regarding its operations, including the corporate events, to its shareholders, potential investors and other interested parties.
- 1-1 The corporate events of the Bank are the events that have been recognized as such in accordance with the law of the Republic of Kazakhstan.
- 1-2. Taking into account the significance of the corporate events, the Bank shall provide the shareholders with the ability to affect the execution thereof by establishing a transparent and fair procedure based on proper disclosure of the information regarding the actions which may have consequences for the Bank.

Clause 1 Article 18 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

2. The basic principles of disclosure of information about the Bank are the following:
 - 1) the regularity and efficiency of provision of information;
 - 2) the availability of information for the majority of shareholders and other parties concerned;
 - 3) the accuracy and completeness of contents of information;
 - 4) maintaining a reasonable balance between the Bank openness and its commercial interests.
3. The Bank shall disclose the information, including the information on the corporate events, on the Internet resources of the Depository of Financial Statements and the Stock Exchange, in accordance with the requirements established by the law of the Republic of Kazakhstan, statutory and regulatory acts of the authorized body¹, as well as the internal documents of the Bank. The disclosure of information means ensuring its availability to all interested parties, regardless of purpose for obtaining such information in compliance with the law of the Republic of Kazakhstan.

Clause 3 Article 18 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

the first paragraph of clause 3 Article 18 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

the first paragraph of clause 3 Article 18 was omitted as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

The procedure of disclosure of the information by the Bank, the requirements regarding the contents of the information subject to disclosure by the Bank, as well as the terms of disclosure of the information by the Bank via the Internet resources of the Depository of Financial Statements and the Stock Exchange, shall be established by the statutory and regulatory act of the authorized body and the internal documents of the Stock Exchange.

¹ Hereinafter, the authorized body means the National Bank of the Republic of Kazakhstan.

the second paragraph of clause 3 Article 18 was added to as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

4. The main forms of disclosure of information about the Bank are as follows:
 - 1) issue prospectus;
 - 2) reports on securities;
 - 3) annual report of the Bank;
 - 4) report on facts essential to the Bank shareholders;
 - 5) financial statements.
5. The disclosed information shall be disseminated in accordance with Article 79.2-2 of the Republic of Kazakhstan Law “On Joint Stock Companies”.

Clause 5 Article 18 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank Shareholders dated December 7th, 2017 (Minutes of Meeting No.02/17).

Clause 5 Article 18 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).

6. The Bank shall protect the information comprising bank or commercial secret.
 Terms of access and use of such information shall be determined by the Bank on the basis of current legislation taking into account the necessity to comply with a reasonable balance between the Bank openness and desire not to harm its interests and interests of its customers.
7. The Management Board shall bear responsibility for the content of the information disclosed and the timeliness of its disclosure.

Article 19. Control of Financial and Economic Activities of the Bank

1. The main purpose of control over financial and economic activities is to protect the funds of shareholders, customers, as well as the Bank's assets.
 Control is carried out in accordance with the requirements of the laws, the Charter and internal normative documents of the Bank.
the first paragraph of clause 1 Article 19 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).
2. *this clause was omitted as per the resolution of the Extraordinary General Meeting of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).*
3. For the purposes to implement control by the shareholders over the financial and economic activities of the Bank, the General Meeting of Shareholders determines independent audit organization acting in accordance with Republic of Kazakhstan Law “On Auditing Activities” and International Financial Reporting Standards.
 Report (conclusion) of independent audit organization shall be notified to the Bank shareholders at a General Meeting of Shareholders and is attached to the annual report of the Bank.
4. In order to ensure efficient control over financial and economic activities, there is internal control over performance of all business transactions of the Bank.
5. The Bank shall develop the internal control procedures based on the following interconnected elements:
 - 1) risk management control;
 - 2) control actions and division of powers;

- 3) information and interaction;
- 4) monitoring and rectification of flaws

Claue 5 Article 19 was amended as per the resolution of the Extraordinary General Meeting of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).

6. The Board of Directors approves internal control procedures, assesses the efficiency and gives suggestions on improving the internal control procedures implemented at the Bank, approves internal normative documents regulating the internal control system, hears reports of Internal Audit Service of the Bank.

Claue 6 Article 19 was amended as per the resolution of the Extraordinary General Meeting of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).

7. Internal Audit Service assesses the efficiency of the internal control system and risk management system within the framework of the internal audit of the processes and divisions of the Bank.

Claue 7 Article 19 was amended as per the resolution of the Extraordinary General Meeting of the Bank Shareholders dated December 24th, 2018 (Minutes of Meeting No.04/18).

8. The audit organization and/or partner of the audit organization are subject to change on a periodic basis.

Article 20. Settlement of Corporate Conflicts in the Bank

1. The Bank shall take measures for the timely prevention and settlement of conflicts between the Bank bodies and its shareholders, as well as between the shareholders, if such a conflict affects the interests of the Bank.

Conflict is prevented by the unconditional compliance with legislation, as well as fair and reasonable behaviour in relations with shareholders.

2. The Bank employee responsible for the work with shareholders registers appeals, letters, complaints and suggestions received from shareholders, gives them a preliminary assessment and transmits them to the Bank body the competence whereof includes consideration of the subject of this appeal.

Complete detailed answers are prepared to all appeals of the shareholders, and in case of sending a refusal to shareholder's appeal, motivated reasons for the refusal are sent simultaneously.

3. In the course of settlement of corporate conflict, the main objective of the Bank is to find a solution that, being lawful and justified, would serve the interests of the Bank.
4. With respect to corporate conflicts, the Bank adheres to the following principles:
 - 1) The Bank's position in a corporate conflict is based on Republic of Kazakhstan laws;
 - 2) The Bank is committed to pre-trial settlement of corporate conflicts;
 - 3) The Bank takes measures on early detection of conflicts and provides a clear coordination of the Bank actions to resolve the conflict in a short time;
 - 4) The Bank is required to provide the shareholder with a full detailed reasoned response;
 - 5) the work to resolve the conflict is carried out with direct participation of the shareholders of the Bank through direct negotiations or correspondence therewith.
5. Corporate conflicts on all issues with respect whereof making a decision is not referred to the competence of other bodies of the Bank shall be settled by the Management Board.

6. Corporate conflicts on issues within the competence of the Board of Directors, shall be settled by the Board of Directors.
7. Corporate conflicts that affect or may affect the interests of the Chairman or members of the Management Board are submitted to consideration of the Board of Directors.

Members of the Board of Directors, whose interests are affected or may be affected by the conflict, do not participate in resolution of this conflict.

8. In the event of a corporate conflict between the shareholders of the Bank, which may affect the interests of the Bank itself or its other shareholders, the body of the Bank responsible for consideration of the conflict resolves the issue of whether the conflict affects the interests of the Bank and whether its participation contribute to settle such conflict.
9. With the consent of shareholders being the parties to the corporate conflict, the bodies of the Bank may participate in negotiations between the shareholders, provide shareholders with information and documents they have and relating to the conflict, clarify the legal provisions and provisions of internal normative documents of the Bank, give recommendations and prepare draft documents on settlement of the conflict to be signed by shareholders, on behalf of the Bank within their competence, enter into commitments to shareholders to the extent that it can help to resolve the conflict.

Clause 9 Article 20 was amended as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated December 24th, 2018 (minutes of the Meeting № 04/18).

10. In order to minimize the conflict of interests, the Bank shall implement the procedure of managing the conflict of interests which involves the mechanisms of its realization, as well as the execution control in accordance with the Policy on Management of the Conflict of Interests and the Corporate Code of Conduct.

Clause 10 Article 20 was added to as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

Article 21. Final Provisions

1. The Bank shall review the provisions of this Code in the event of changes in the Republic of Kazakhstan laws, as well as with due account for new trends in the world and Kazakhstan corporate governance practices.
2. In order to follow the provisions of this Code and monitor compliance of its provisions with the Bank activities, as well as for active implementation of the Code in the practice, the Bank considers appropriate doing as follows:
 - 1) provide this Code as a separate document to all parties, with no exception, by posting it on the website;
 - 2) disclose in the annual report of the Bank the information on whether the Bank complies with provisions of this Code;
 - 3) disclose the information on compliance with specific provisions of this Code as part of the additional substantial general information about the Bank disclosed on securities of the Bank;
 - 4) consideration by the Board of Directors at its meetings of issues whether the Bank follows the provisions of this Code, and whether those provisions comply with Republic of Kazakhstan laws and international practice of corporate behavior.
3. Shareholders, members of the Board of Directors, members of the Management Board, employees of the Bank and other parties concerned have the right to report any violations of this Code to the Chairman of the Board of Directors and/or Chairman of the Management Board, as well as following the procedure established by the Corporate Code of Conduct of Employees.

Clause 3 Article 21 was added to as per the resolution of the Extraordinary General Meeting of Shareholders of the Bank dated October 16th, 2020 (minutes of the Meeting № 02/20).

4. The provisions of this Code contrary to Republic Kazakhstan laws on joint stock companies and the Charter shall be deemed as invalid.