



Corporate Code of «BAKAI BANK» OJSC

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1. General Provisions

1. The Corporate Code of BAKAI BANK OJSC defines the standards of activity of BAKAI BANK OJSC (hereinafter referred to as the Bank) and the behavior of its employees, aimed at maintaining ethical standards, quality of customer service, enhancing the Bank's image, strengthening its business reputation, increasing profitability, financial stability and the Bank's overall efficiency.
2. The purpose of the Corporate Code of BAKAI BANK OJSC (hereinafter referred to as the Code) is to form and implement into the daily practice of the Bank's activities appropriate norms and principles of corporate conduct by the Bank's employees, professional and business ethics that meet international standards and contribute to the successful development of the Bank, the implementation of its strategic goals and objectives.
3. All Bank employees are required to adhere to the standards contained in this Code when acting on behalf of the Bank.
4. The provisions of this Code are aimed at forming a positive image of the Bank in the eyes of its clients, shareholders, employees and other interested parties, as well as protecting the interests of creditors, depositors and shareholders, maintaining sustainable growth, positive financial results of the Bank, including in accordance with the provisions of the Bank's Charter.

2. Mission and objectives of the Bank

5. The Bank's mission is to bring confidence, reliability and stability to clients in providing services of a universal and domestic Bank .
6. The bank aims at intensive development and constant movement towards improvement, optimization of activities to meet the needs of clients. The bank does everything possible to form an effective system for providing high-quality products and services that meet the highest requirements of modern society.
7. The bank intends to maintain a high level of profit, constantly increasing its value. At the same time, a necessary condition for achieving the goal is to improve the efficiency and quality of all business processes.

3. Core corporate values and principles

8. The main corporate values and principles of the Bank's commercial activities, on which this Code is based, are:

- 8.1. **Respect for the individual.** The Bank respects human rights and freedoms regardless of gender, race, nationality, social status, political beliefs and legal status – their observance is the most important value for the Bank. The Bank and its employees understand their civic and professional duty to citizens and legal entities – the Bank's clients, society and the state.
- 8.2. **Reputation.** An impeccable reputation is the Bank's main asset and highest value, the guarantee of its stability and development. The Bank values its reputation, for which the Bank's corporate values must be observed and applied in daily work and on an ongoing basis.
- 8.3. **Honesty and mutual respect.** The Bank builds relationships with clients, employees, business partners and representatives of state and municipal authorities on the principles of honesty and mutual respect. The Bank respects their values and positions, establishes and develops professional ties based on mutual assistance and mutually beneficial cooperation.
- 8.4. **Confidentiality.** The Bank's managers and employees shall not disclose confidential information that became known to them in the course of performing their official duties. The Bank's clients and business partners may be confident that information about them, their entrepreneurial and other activities, including information that they are clients of the Bank, is confidential and is not subject to disclosure, except for cases stipulated by the current legislation of the Kyrgyz Republic and contractual relations. Issues of confidentiality of information are regulated in the Bank in accordance with the Rules for ensuring the safety of restricted information in BAKAI BANK OJSC, the Procedure for ensuring information security for an employee of BAKAI BANK OJSC and the Rules for ensuring information security of BAKAI BANK OJSC.
- 8.5. **Fairness.** The Bank treats every citizen with respect and at the same time does not allow the provision of unjustified privileges and advantages in hiring and/or promotion, as well as in the provision of material incentives.
- 8.6. **Legality and responsibility.** The Bank strives to strictly comply with the generally recognized principles and norms of the current legislation of the Kyrgyz Republic, international law, the provisions of this Code and other internal regulatory documents of the Bank.
The bank is responsible to its shareholders for the results of its activities, to its clients for the quality of banking services, to its business partners for the proper fulfillment of its obligations, to society and the state for respect for the individual, his rights and freedoms, and for his contribution to the development of the country's economy.
- 8.7. **Satisfaction of customer needs.** Satisfaction of customer needs by providing them with high quality services is one of the most important values of the Bank.
- 8.8. **High quality of services and professionalism.** The bank strives to provide services to its clients that meet high quality standards and set fair market rates. The bank strives for constant self-improvement, innovation, and seeks the best means and opportunities for more efficient work.
The Bank undertakes at least the following obligations:
 - act respectfully, honestly and openly in your work with the client;
 - provide services to all persons without discrimination on the basis of social, racial, national, linguistic or religious affiliation, as well as regardless of gender, place of residence, beliefs, membership in public associations, or other circumstances;
 - provide assistance in choosing services that best meet the client's interests;
 - guarantee compliance of the services provided with the current legislation of the Kyrgyz Republic;
 - charge for services rendered a fee commensurate with their volume, quality and complexity.
- 8.9. **Dedication to the cause.** The Bank's employees are dedicated to the common cause and strive to achieve the set goals.
- 8.10. **Transparency.** The Bank adheres to the policy of maximum transparency of its activities for clients, business partners, state and municipal authorities, shareholders, employees and builds its relations with clients and business partners on the basis of respect, equality and openness. The

Bank strives to use all available communication channels (information methods): printed publications, television and radio broadcasting, as well as the Internet for free access of all interested parties to disclosed information about the Bank.

- 8.11. **Safety and efficiency of work.** The Bank takes all necessary measures to prevent any illegal actions by third parties in relation to the Bank, its clients, business partners, shareholders and employees. The Bank pays special attention to creating conditions that ensure the efficiency and safety of its employees, as well as the appropriate level of protection of their health.
- 8.12. **Profitability.** Receiving profit ensures sustainable growth and development of the Bank and allows shareholders to exercise their right to receive dividends.

4. Conflict of interest

9. A conflict of interest arises when the personal interest of a Bank employee influences the decision-making process and may harm the interests of the Bank.
10. Bank employees report the existence or potential possibility of a conflict of interest to their immediate supervisor.
11. The Bank's employees fully disclose information that may directly or indirectly lead to a conflict of interest in accordance with the provisions of the Regulation on Conflicts of Interest in BAKAI BANK OJSC.

5. Basic principles of corporate conduct

12. The principles of corporate conduct and ethics regulate the following main areas: relations with employees, clients, business partners, government bodies and the public.
13. The Bank strives to comply with the principles of ethics in all aspects of its activities, while the Bank assumes feasible obligations and fulfills the accepted obligations on time.
14. The Bank builds relationships with employees on the principles of long-term cooperation, mutual respect and strict fulfillment of mutual obligations.
15. The Bank does not allow any manifestations of discrimination against employees on political, religious, national, or other grounds not related to professional qualities when hiring, paying, or promoting.
16. The Bank takes measures aimed at protecting health, including through the introduction of new technologies that improve working conditions and ensure the safety of workers in conditions of equal rights and opportunities for workers.
17. The bank creates all the necessary conditions for professional growth and ensuring the social well-being of employees.
18. The Bank welcomes the active participation of employees in the life of the Bank, which contributes to the development of corporate culture and internal cooperation.
19. The Bank is interested in establishing long-term partnerships with its clients and contributes to their development in every possible way. The Bank is constantly working to improve the client service system, develops and implements new forms and types of banking services, strives to expand the capabilities of clients and create the most convenient service conditions for them. The established corporate goals for the quality of services, maintenance and development are presented in *the Quality Standards of Client Service of BAKAI BANK OJSC*.
20. Employees must make every effort to minimize any risks of the Bank's clients and counterparties. At the same time, minimizing the risks of the client and counterparties should not lead to an increase in the Bank's risks.
21. The Bank strives to fulfill contractual obligations and values business relationships. In particular, the Bank:
- negotiates contracts based on the principles of mutual respect and mutual benefit;
 - in case of controversial situations, always strives to develop a mutually acceptable and fair solution.
22. The Bank strives to strictly comply with the current legislation of the Kyrgyz Republic on combating the legalization of proceeds from crime and conducting business with reliable clients and counterparties who are engaged in legal activities and receive income only from legal sources.

23. In relations with state authorities and local governments, the Bank considers itself obliged to:
- build your relationships with government agencies as like-minded people in working for the benefit of citizens, society, and the state;
 - fully and promptly comply with the requirements of state bodies based on the norms of the current legislation of the Kyrgyz Republic;
 - exclude attempts to use illegal or immoral methods or means of influencing decisions of state bodies, including judicial bodies.
24. The Bank's employees carefully consider and promptly respond to comments, complaints and claims against the Bank from clients, counterparties, representatives of state and municipal authorities.
25. The Bank supports free competition and builds relationships with competitors on the principles of honesty and mutual respect. The Bank views competitors as an additional incentive for its development.
26. The Bank proceeds from the fact that violation of civilized norms of doing business and rules of business conduct is unacceptable, since it hinders the achievement of set goals and involves high reputational risks.

6. Corporate Ethics

27. ***Ethics of employee behavior.***
- 27.1. Employees are the foundation of the Bank's reputation. In this regard, any unethical or antisocial actions committed in the workplace or in free time may damage the Bank's reputation.
- 27.2. All employees must cooperate on the basis of mutual respect, with due regard for the right to protect privacy and human dignity. Respectful attitudes towards each other, towards the values and traditions of the Bank, towards its shareholders, members of the Board of Directors and the Management Board help to create an open, fair and tolerant working atmosphere.
- 27.3. The Bank does not tolerate any violations of discipline and ethics that threaten the reliability and safety of work, including:
- uncoordinated decisions that infringe on the interests of the Bank and/or other employees;
 - systematic failure to perform and/or poor performance of work duties;
 - disclosure of confidential, commercial and official information about the Bank, its clients and counterparties;
 - being at work while under the influence of alcohol, drugs or toxic substances;
 - use of foul language;
 - neglect or deliberate failure to comply with occupational safety requirements;
 - any form of discrimination against employees and disrespectful attitude towards colleagues, business partners or competitors of the Bank;
 - relations between Bank employees, regardless of their position or area of activity, are built on the principles of mutual respect and assistance, openness and goodwill, teamwork and focus on cooperation;
 - Any form of disdainful or offensive attitude towards each other and the use of physical force are unacceptable.
- 27.4. Bank employees are prohibited from doing the following in relation to their colleagues:
- display rudeness, aggression, or assault on the Bank's premises, as well as at corporate events organized by the Bank;
 - use of discriminatory, offensive, obscene, vulgar, rude, cruel and aggressive expressions;
 - use of psychological pressure and harassment.
- 27.5. In the course of their activities, the Bank's employees must adhere to a strategy of total non-acceptance of corruption, commercial bribery, abuse of authority, anti-competitive behavior, fraud and other abuses in any form or manifestation.
- 27.6. Bank employees are required to:
- refrain from committing and/or participating in the commission of corruption and other offenses in their own interests or on behalf of the Bank;

- refrain from behavior that may be interpreted by others as a willingness to commit corruption or other offenses or to participate in their commission in their own interests or on behalf of the Bank.
- 27.7. The Bank prohibits falsification and/or deliberate distortion of information, reports and other documents submitted to authorities and clients. It is prohibited to disseminate false information, conceal or distort facts, or misuse information obtained in the course of performing official duties or in relations with the media.
- 27.8. In order to prevent cases of use of confidential information, employees of the Bank must not disclose it until such information is publicly disclosed. Having such information, employees must not pass it on to relatives or any other persons. Obligations on non-disclosure of confidential information must be fulfilled even after the end of work at the Bank.
- 27.9. The employee must not make public statements, judgments and assessments regarding the activities of the Bank and its management, immediate supervisors, colleagues and partners in the media that may negatively affect the image and business reputation of the Bank. In the event that representatives of the media contact him/her, the Bank employee must immediately inform the Head of the Marketing and Business Development Department about this.
- 27.10. The Bank's employees may engage in any political, religious or social activity not prohibited by the legislation of the Kyrgyz Republic, provided that it is carried out in their free time from performing their official duties and outside the workplace.
- 27.11. Employees of the Bank shall not use the name of the Bank, financial, material or any other resources of the Bank to carry out their political, religious or social activities.
- 27.12. A Bank employee must not use the Internet and corporate mail for personal purposes. A Bank employee is prohibited from posting work materials and acting as a representative of the Bank with statements, comments, if this is not part of his job responsibilities.
- 27.13. The workplace must be kept in general order and cleanliness; the presence of foreign objects that are not related to the Bank employee's activities is unacceptable. Work folders must be placed on shelves and easy access to them must be provided. Front office employees must not have kitchen utensils in the workplace or in the operating room during working hours. Lunches must be organized only during the lunch break.
- 27.14. If an employee serves the Bank's clients, he/she must prepare the workplace before the opening of the operating room.
- 27.15. The Bank serves clients without a lunch break. Front office workers and other employees involved in servicing clients must independently regulate their lunch schedule in order to optimally use working time for servicing. The start and end times of servicing the Bank's clients, as well as the work of the first and second shifts, are regulated by special orders of the Chairman of the Board of the Bank.
- 27.16. The employee must observe labor discipline. In cases where the circumstances may lead to a breach of discipline, the employee must inform the immediate supervisor about this. At the same time, the employee strives to minimize the occurrence of such circumstances.
- 27.17. A Bank employee communicates with representatives of the media as a representative of the Bank and/or disseminates information regarding the Bank's activities to representatives of the media only upon the instruction of the Chairman of the Management Board or the Deputy Chairman of the Management Board of the Bank.
28. ***Ethics of behavior of managers.***
- 28.1. Managers at all levels must, through their behavior in practice, set an example of ethical behavior, compliance with the requirements of the anti-corruption legislation of the Kyrgyz Republic and the internal regulatory documents of the Bank, including this Code.
- 28.2. In performing their duties, managers at all levels must:
- proceed from the interests of the Bank, work in good faith, constantly improve professionalism and competence;
 - demonstrate leadership qualities, be a role model, comply with business ethics and generally accepted norms and rules;

- treat employees with respect, respect their rights, do not allow in their management practices the use of methods that harm the personal dignity of employees, and make informed, legal decisions;
- in their professional activities, follow business communication standards, maintain the business reputation and image of the Bank when interacting with business partners and contractors;
- prevent the Bank from participating in questionable transactions (deals) that could cause material or reputational damage;
- take all necessary measures to prevent and resolve conflicts of interest that arise among Bank employees.

28.3. The Bank's managers and senior officials must be a model of professionalism and impeccable reputation for their subordinate employees, contribute to the formation of a favorable moral and psychological climate for effective work in the Bank or its division, and set an example of honesty, impartiality and fairness with their personal behavior.

29. ***Ethics of relationships between managers and subordinates.***

29.1. Relationships between managers and subordinates are built on the principles of openness of management towards employees, provision by managers of equal opportunities for all their subordinates to perform their duties, support for the initiative of subordinates, understanding the specifics of the work of subordinates and sharing responsibility for the results of their work, impartiality and fair assessment of the results of the work of subordinates.

29.2. Relationships between subordinates and managers are built on the principles of respect, discipline and observance of subordination, conscientious performance of both their direct job responsibilities and other management tasks not described in job descriptions, but directly related to the scope and specifics of the Bank's division's activities.

7. Corporate style

30. The Bank considers image as an important tool in achieving goals and implementing the tasks facing it. Therefore, one of the most important professional duties of all employees, regardless of the position they hold, is daily work to comply with the requirements of corporate culture and maintain the image of the Bank's employee.

31. An employee, regardless of the level, type and method of communication, should strive to be polite, friendly, responsive, and tolerant of the facts of inappropriate communication with him/her from clients and business partners. An employee of the Bank is obliged to immediately report to his/her immediate supervisor all facts of inappropriate communication with him/her in the process of performing his/her duties.

32. Bank employees are prohibited from doing the following in relation to their colleagues:

- display rudeness, aggression, or assault on the Bank's premises, as well as at corporate events organized by the Bank;
- use of discriminatory, offensive, obscene, vulgar, rude, cruel and aggressive expressions;
- the use of psychological pressure in any form.

33. Employees are advised to maintain a business style of dress that corresponds to the image of the Bank. The employee's appearance must strictly comply with the requirements of the Regulation on the appearance of employees of BAKAI BANK OJSC.

8. Ensuring the safety of the Bank's property

34. Bank employees should use Bank property wisely and productively, prevent its loss or misuse. Bank property is intended to help employees achieve their job goals.

35. In order to protect and properly use the Bank's property, employees are advised to:

- exercise reasonable care and caution to prevent theft, damage or improper use of the Bank's property;
- immediately report to your immediate supervisor any actual or suspected theft, damage or improper use of Bank property;

- protect computer systems, databases, communications equipment and written materials from unintentional and unlawful access by third parties;
- use the Bank's property, as well as software products and communication networks, only for legitimate business purposes within the framework of the job responsibilities performed.

9. Anti-corruption culture

37. The Bank is guided by the principles of honesty and objectivity in the formation of personnel (including management): Bank employees are appointed or transferred to higher positions only based on their business qualities.

38. All employees of the Bank, regardless of their position, are obliged to act in good faith and reasonably in the best interests of the Bank. Members of the Board of Directors and the Management Board of the Bank set an example of non-acceptance of corruption and commercial bribery, intolerance of corrupt behavior in any form and manifestation at all levels of the Bank.

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

- analyzes the reputation of potential counterparties and their shareholders and members of management bodies for tolerance to corruption, including the presence of similar documents;
- informs them of the principles and requirements of the Bank in the area of combating corruption, including those established by this Code;
- takes into account their willingness to comply with the principles and requirements in the field of combating corruption, as well as to provide mutual assistance to prevent corruption.

40. The Bank pays special attention to the issues of interaction between the Bank's employees and government officials due to the high corruption risks that arise. For this purpose, it takes measures aimed at preventing the Bank from being held legally liable, including by establishing a ban on:

- transfer, offer or promise on behalf of and in the interests of the Bank to a civil servant and/or other persons of monetary funds, securities, other property, provision of property services to him, granting of property rights for the performance in the interests of this employee of an action (inaction) related to the position he occupies;
- offering and attempting to give any gifts to inspectors and/or other persons.

41. The Bank's employees are obliged to comply with the requirements established by the Bank related to the prevention and combating of corruption, in particular:

- refrain from committing and/or participating in the commission of corruption and other offenses in their own interests, in the interests of or on behalf of the Bank;
- refrain from behavior that may be interpreted by others as a willingness to commit or participate in the commission of corruption or other offenses in their own interests, in the interests of or on behalf of the Bank;
- strictly comply with the requirements of the current legislation of the Kyrgyz Republic in the field of combating corruption and commercial bribery, as well as the principles of professional ethics and ethical standards of business conduct;
- when performing their functional duties or when carrying out their activities on behalf of the Bank in foreign countries, they must comply with the anti-corruption legislation of the Kyrgyz Republic, as well as the requirements of this Code;
- notify the immediate supervisor of any suspicions of corruption offenses committed by employees or clients of the Bank so that the relevant SP can conduct an official investigation into this fact.

42. For corruption and other offenses in the Bank, disciplinary, administrative, labor and criminal liability measures are applied in accordance with the current legislation of the Kyrgyz Republic, as well as corporate action measures in accordance with the Bank's internal regulatory framework.

43. The Security Department and the Economic Security Department conduct official investigations into all suspicions of corruption in the Bank.

10. Violations of the requirements of this Code

44. The results of illegal actions by employees, including those violating the requirements of this Code, may be causing losses to the Bank by imposing fines, claims for compensation for damages, loss of the Bank's business reputation in the business community, etc.

45. All questions and reports from employees about known or suspected violations of the Kyrgyz Republic legislation or this Code are considered as thoroughly and objectively as possible.

46. In each individual case, the case of violation of the requirements of this Code must be considered taking into account all the circumstances. An employee who has violated the requirements of this Code must be given the opportunity to present his vision of the events that occurred before a final decision is made on the application of measures of influence to him.

47. The employee is held responsible for violation of the Code in accordance with the current legislation of the Kyrgyz Republic.

11. Final Provisions

48. All employees are required to adhere to the standards contained in this Code when acting on behalf of the Bank, regardless of their location.

49. This Code is an integral part of the employment contract of each employee of the Bank. Each employee of the Bank must study the Code by signing the familiarization sheet.

50. Responsibility for compliance with this Code extends to all employees of the Bank.

51. Control over compliance with the requirements of this Code is assigned to the Bank's Management Board.

52. This Code, as well as amendments and additions made to it, are approved by the Board of Directors and are reflected in the following table:

No	Date of change	Full name, position, of the person responsible for making changes/additions	Brief description of changes/additions