



Human Rights Policy of BAKAI BANK OJSC
Bishkek, 2025

Contents

1. **General Provisions**.....2
2. **Key Obligations**3
3. **Compliance with the Policy**4
4. **Reporting Violations of the Policy**4
5. **Final Provisions**5

1. General Provisions

1. The Human Rights Policy of BAKAI BANK OJSC (hereinafter referred to as the Policy) forms a unified corporate approach, defines and details the responsibilities and key obligations of BAKAI BANK OJSC (hereinafter referred to as the Bank) with respect to observance and protection of human rights.

2. The Bank complies with the Constitution of the Kyrgyz Republic and the legislation of the Kyrgyz Republic in the human rights area, including labour rights, as well as international human rights standards, including:

- Universal Declaration of Human Rights;
- International Covenant on Economic, Social and Cultural Rights (ratified by the Kyrgyz Republic on 07.10.1994);
- International Covenant on Civil and Political Rights (1966) (ratified by the Kyrgyz Republic on 07.10.1994);
- Convention on the Elimination of All Forms of Racial Discrimination (CERD) (1965) (ratified by the Kyrgyz Republic on 05.09.1997);
- Convention on the Elimination of All Forms of Discrimination against Women (1979) (ratified by the Kyrgyz Republic on 10.02.1997);
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984) (ratified by the Kyrgyz Republic on 05.09.1997);
- Convention on the Rights of Persons with Disabilities (2006) (ratified by the Kyrgyz Republic on 16.05.2019);
- CIS Convention on Human Rights and Fundamental Freedoms (1995) (ratified by the Kyrgyz Republic on 01.08.2003);
- Convention on the Protection of the Rights of Persons Belonging to National Minorities (1994) (ratified by the Kyrgyz Republic on 01.08.2003);
- Declaration of the International Labor Organization on Fundamental Principles and Rights at Work;
- UN Guiding Principles on Business and Human Rights;
- UN Global Compact.

3. The purpose of the Policy is to ensure respect for human rights at all stages of operations of the Bank, application of diversity and inclusion in the workplace, aimed at creating a working environment in which all employees of the Bank, regardless of their origin or identity, feel valued and have equal opportunities to succeed.

4. The Bank informs counterparties of the Bank of the principles and content of the Policy and expects that counterparties of the Bank will strictly respect human rights, including the labour rights of their employees.

5. The following terms are used in the Policy:

Counterparties	any legal entities and individuals, individual entrepreneurs interacting with the Bank on the basis of contracts or other legally binding agreements, including within the framework of pre-contractual relations.
-----------------------	--

Discrimination	illegal and unjustified restrictions on the rights and freedoms of employees, clients, counterparties and other stakeholders of the Bank.
Employee of the Bank	employees of the Head Office, as well as branches, departments, and representative offices of the Bank, who work based on an employment contract concluded with the Bank.
Forced labour	any activity, work or service required of any person under threat of coercion or punishment and for which that person does not offer his or her services voluntarily.
Human rights	inalienable rights of every human being, based on the recognition of dignity, freedom and equality.
Personal data	information recorded on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing this person to be identified directly or indirectly by reference to one or more factors specific to his or her biological, economic, cultural, civil or social identity. Personal data includes biographical and identification data, personal characteristics, information about marital status, financial status, health status, etc.
Stakeholders	legal entities and individuals who may be interested in the results of activities of the Bank and creation of value and/or may have a significant impact on activities, products and services of the Bank, or whose decisions or actions may affect ability of the Bank to create value, successfully implement its strategies and achieve its goals, as well as individuals and legal entities affected by activities of the Bank.

2. Key Obligations

6. Being a major employer, responsible business partner and client-centric company, the Bank respects human rights and freedoms, and seeks to identify and prevent negative human rights impacts in its operations.
7. The Bank demonstrates zero tolerance for:
 - any forms of discrimination or bias against employees, clients and other stakeholders of the Bank based on gender, age, nationality, race, religious beliefs, social origin, property status, sexual orientation and other distinctive characteristics;
 - harassment, threats and violence in any form, including physical, sexual and psychological, against employees, clients and other stakeholders of the Bank.
8. The Bank does not use forced labour or child labour. The minimum age of employees of the Bank corresponds to the statutory age for concluding an employment contract.
9. The Bank strives to ensure equal opportunities for all employees in terms of employment, career development, remuneration and training. Restrictions on labour rights due to circumstances that are not related to the business qualities of employees are considered unacceptable.
10. The Bank complies with national legislation regarding working hours, overtime hours, paid annual leave and public holidays.
11. The Bank ensures equal rights and guarantees in remuneration of men and women without discrimination based on gender and provides employees with equal pay for equal work.
12. The Bank recognizes and supports the right of employees to a safe and comfortable working environment, strives to strictly comply with the labour protection rules and requirements.

13. The Bank respects the rights of employees to freedom of assembly, collective bargaining and conclusion of collective agreements.
14. The Bank recognizes and respects the rights to freedom of expression, personal integrity, and the absence of interference in personal and family life. Employees of the Bank have the right to express and defend their professional opinion.
15. The Bank protects the personal data of employees, clients and other stakeholders, using them exclusively within the framework of the legislation of the Kyrgyz Republic and with the consent of the subjects of personal data.
16. The Bank respects the civil rights of employees and recognizes their right to personal participation in political activities, but not on behalf of the Bank, and if such personal participation does not create a conflict of interest.
17. The Bank strives to create opportunities and conditions for the unimpeded receipt of financial products and services by people with disabilities, people with limited mobility and elderly people, including by providing an accessible environment in offices of the Bank and further improving remote banking services, for example, mobile applications of the Bank.
18. The Bank adheres to the principle of inadmissibility of unjustified refusal to provide financial products and services to clients.
19. The Bank reserves the right to conduct a procedure for assessing potential clients and counterparties for social and environmental impact, as well as to limit the financing of clients whose activities are socially or environmentally unfavourable, including with respect to human rights.

3. Compliance with the Policy

20. Employees of the Bank, regardless of a position they hold and a length of their employment with the Bank, are obliged to strictly comply with the Policy and the human rights legislation of the Kyrgyz Republic.
21. Violation of the Policy is considered by the Bank as a serious offense, which may lead to the application of disciplinary measures and other liability to employees if there are legal grounds.
22. Control over implementation of the Policy is assigned to the Management Board of the Bank.
23. Heads of structural units and branches of the Bank are responsible for informing employees about the rules and provisions of the Policy and the obligation to comply with its provisions. Responsibility for familiarizing newly hired employees with the Policy is assigned to the HR Department.

4. Reporting Violations of the Policy

24. Employees who have reason to believe that the provisions of the Policy are being violated have the right to report it in any of the following ways:
 - to their immediate supervisor or, if the report concerns the actions of an immediate supervisor, to a higher-level manager, who in turn should then provide the information received to the ESG unit of the Bank;
 - directly to the ESG unit of the Bank.
25. To ensure the receipt of requests and appeals from various stakeholders regarding the observance of human rights in the Bank and a timely response to them, a hotline is in operation (e-mail ethics@bakai.kg). The Bank guarantees confidentiality to any person who applies.
26. In relation to all appeals regarding potential violation of human rights, the Bank conducts internal investigations in accordance with the internal regulations to confirm facts of human rights violations and determine measures to resolve the situation that arises and prevent its occurrence in the future.
27. The ESG Development Office monitors the effectiveness of measures taken in relation to existing and potential human rights violations with respect to stakeholders affected by activities of the Bank.

28. The Bank prohibits the prosecution of employees and other persons who have reported a violation in good faith, assisted in conducting internal investigations, or refused to participate in activities that contradict the provisions of the Policy.

29. The ESG Development Office is responsible for maintaining records and conducting preliminary analysis of incidents related to human rights and has the right to involve other structural units of the Bank in a detailed analysis of incidents, as well as in development and implementation of measures to resolve incidents, if necessary.

5. Final Provisions

30. The Policy is published on the official website of the Bank and is intended for mandatory familiarization and application by all governance bodies of the Bank, all structural units and employees of the Bank.

31. The Policy, as well as additions and amendments made to it, shall be agreed upon by the Management Board of the Bank and approved by the Board of Directors of the Bank.

32. The Policy comes into force on the date of approval by the Board of Directors of the Bank, unless a different period for its implementation is established by a decision of the Board of Directors of the Bank.

33. The policy is regularly reviewed for its relevance and compliance with the legislation of the Kyrgyz Republic and international human rights practices that do not contradict the legislation of the Kyrgyz Republic.

34. On all issues not reflected in the Policy, the Bank is guided by the legislation of the Kyrgyz Republic and internal regulatory documents of the Bank.

35. If, as a result of changes in the legislation of the Kyrgyz Republic, certain provisions of the Policy come into conflict with it, the current legislation of the Kyrgyz Republic should be followed until changes are made to the Policy.