Anti-Corruption Policy of BAKAI BANK OJSC

Subject:	This Policy sets out the Bank's core principles and requirements for preventing corruption, and ensuring full compliance with the anti-corruption laws of the Kyrgyz Republic.	
Document Type:	Policy	
Owner:	Compliance Control Department	
Scope of Application:	All structural divisions of the Bank	
Endorsed by:	Marketing Department	
	Legal Department	
	HR Department	
	Risk Management Department	
	Economic Security Unit	
	Methodology and Secretariat Department	
Endorsed by:	Management Board of BAKAI BANK OJSC	Minutes No. 33 dated April 23, 2026
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1. General Provisions

1. The Anti-Corruption Policy of BAKAI BANK OJSC (hereinafter – the "Policy") is an internal regulatory document of BAKAI BANK OJSC (hereinafter – the "Bank") that establishes the core principles and requirements aimed at preventing corruption and ensuring compliance with the anti-corruption legislation of the Kyrgyz Republic within the Bank.
2. This Policy has been developed in accordance with the applicable laws of the Kyrgyz Republic, the Bank's Charter, and the Bank's internal regulatory documents, and also reflects internationally recognized anti-corruption practices.
3. The Policy forms part of the Bank's compliance risk management framework and sets out the managerial and organizational foundations for preventing corrupt practices, as well as for mitigating and/or eliminating the consequences of corruption-related violations.
4. The objectives of this Policy are to:
   a. facilitate compliance with the anti-corruption laws of the Kyrgyz Republic, including the Law of the Kyrgyz Republic "On Combating Corruption," within the scope of the Bank's authority
   b. strengthen the system of corporate controls aimed at preventing any form of corruption, both on behalf of and in relation to the Bank and/or its employees
   c. reaffirm the Bank's commitment to high standards of business ethics and foster a corporate culture based on zero tolerance for corruption
   d. promote anti-corruption awareness and corporate responsibility within the Bank
   e. define accountability measures for corruption-related violations.
5. The key tasks in combating corruption within the Bank are to:
   – establish effective mechanisms, procedures, controls, and other measures aimed at preventing and combating corruption and commercial bribery
   – minimize the risk of the Bank and its employees being involved in corrupt activities
   – ensure timely reporting to the Bank's governing bodies on corruption-related violations and the measures taken to address them.
6. For the purposes of this Policy, the following terms shall be used:

Anti-Corruption Legislation of the Kyrgyz Republic	The Law of the Kyrgyz Republic "On Combating Corruption" and other regulatory

	acts that apply to the Bank as a legal entity, its employees in the course of their official duties, and the Bank's counterparties.
Stakeholders	with an interest in the Bank's performance and value creation, or with the ability to significantly influence its operations, products, or services. This also includes parties whose decisions or actions may affect the Bank's ability to create value and execute its strategy and achieve its objectives, as well as those impacted by the Bank's activities.
Client	A client is any individual, legal entity, sole proprietor, foreign trust, or other legal arrangement that is accepted for service by the Bank, is currently serviced by the Bank, or with whom the Bank has established or intends to establish a business relationship.
Commercial Bribery	The unlawful transfer to a person vested with decision-making authority including a person capable of influencing decision-making at a bank or other organization of money, securities, or other property, as well as the unlawful provision of services of a pecuniary nature to such a person in exchange for actions (or inaction) in the interests of the giver, in connection with the official position held by that person.
Counterparties	Any legal entities, individuals, or sole proprietors that engage with the Bank under contracts or other legally binding arrangements, including during pre-contractual negotiations or relationships.
Conflict of Interest	A situation where the personal interests of Bank officers and/or employees conflict with their proper performance of official duties, or where the property or other interests of the Bank, and/or its employees, and/or its clients may be compromised, creating potential adverse consequences for the Bank or its clients.
Corruption	an act prohibited by criminal law, as well as the use by perpetrators of corruption offenses of the official powers granted to them or the opportunities associated therewith for the purpose of obtaining or deriving, either personally or through intermediaries, property (non-property) benefits and advantages, or an unlawful benefit, or accepting an offer of such a benefit for themselves or others, or offering (providing) an unlawful benefit to a public

	official or, at the official's request, to other individuals or legal entities with the aim of inducing that person to unlawfully use the official powers granted to them or the opportunities associated with such powers .
Corruption Risk	The likelihood that circumstances may arise which facilitate the commission of corrupt acts.
Unlawful benefit	Any tangible or intangible benefit (including cash, property, services, privileges, advantages, and other assets) that a public official or a person deemed equivalent to a public official promises, offers, transfers, or receives without lawful grounds in connection with the use of their official position
Zero Tolerance for Corruption	The Bank's complete rejection of corruption in any form. Employees and third parties acting for or on behalf of the Bank are strictly prohibited from engaging in corrupt conduct, directly or indirectly, personally or through intermediaries.
Anti-Corruption	The activities of anti-corruption entities, within the scope of their authority, aimed at preventing corruption, combating corruption, and minimizing and/or eliminating the consequences of corruption offenses, including: a) corruption prevention—a set of measures to study, identify, and eliminate the causes and conditions that contribute to the commission of corruption offenses, as well as activities aimed at fostering a zero-tolerance attitude toward corruption in society; b) combating corruption—the identification, investigation, detection, and suppression of corruption offenses, and the holding of guilty persons accountable in accordance with the law; c) minimization and/or elimination of the consequences of corruption offenses—the application of appropriate measures aimed at reducing the severity of harm caused by corruption offenses and eliminating the consequences of corruption
Bank Employee	An individual employed at the Bank's Head Office, branches, divisions, or representative offices under an employment agreement with the Bank.
Third Party	Any individual or legal entity, including sole proprietors, with whom the Bank interacts in

	the course of business, including but not limited to clients, counterparties, government bodies, and public officials.

2. Scope of Application

7. This Policy applies to all employees of the Bank, regardless of position or length of service, in the course of performing their duties or representing the Bank's interests.
8. The Bank encourages its counterparties to align with the principles and requirements set forth in this Policy.
9. The principles and requirements of this Policy extend to the Bank's counterparties, including suppliers, agents, consultants, advisers, representatives, and other third parties, where such obligations are expressly included in contracts with them or directly arise under applicable anti-corruption laws.
10. The Bank takes all reasonable measures to inform relevant stakeholders of the approaches, principles, and requirements established by this Policy, including ensuring that employees are introduced to the Policy upon entering into an employment agreement and sign an acknowledgment to comply with its provisions.

3. Anti-Corruption Principles

11. The Bank's anti-corruption efforts are guided by the following principles:
- Legality
- Zero tolerance for corruption in any form
- Compliance of the Bank's activities with applicable laws and recognized standards
- Leadership setting a personal example in ethical and anti-corruption conduct
- Active engagement of employees in anti-corruption effortsthe inevitability of liability for committing corruption offenses
- Transparency and communication with stakeholders, including employees, clients, counterparties, and the public - regarding the Bank's anti-corruption initiatives
- Cooperation with government authorities, as well as with the Bank's clients and counterparties, in combating corruption
- Prohibition of any form of discrimination or infringement of rights and freedoms on the basis of origin, gender, race, nationality, language, religion, political or religious beliefs, or any other personal or social grounds.

12. Anti-corruption measures within the Bank are carried out by its governing bodies and employees, within the scope of their authority, and include:
- Prevention of corruption – preventing corruption, including identifying and addressing the root causes of corruption
- Combating corruption - detecting, preventing, suppressing, disclosing, and investigating corrupt practices
- Minimizing and/or eliminating the consequences of corrupt practices
- Assisting in the detection, prevention, suppression, disclosure, and investigation of corrupt practices.

4. Corrupt Practices

13. For the purposes of this Policy, the following are deemed corrupt practices:

1. Offering, promising, or providing any financial, property-related, and/or other unlawful benefit or advantage, including the offer, promise, or giving of a bribe, with the intent to induce a decision in favor of the person providing such benefit/advantage or a related party
2. Requesting, soliciting, agreeing to receive, or accepting any financial, property-related, and/or other unlawful benefit or advantage with the intent to induce a decision in favor of the provider of such benefit/advantage or a related party
3. Fraud, or the misuse of one's official position contrary to the lawful interests of the Bank, in order to obtain financial, property-related, or other unlawful benefit or advantage
4. Using confidential information, obtained in the course of official duties, and not subject to disclosure, for personal or group interests
5. Any other actions that violate the anti-corruption laws of the Kyrgyz Republic.

14. The actions listed in paragraph 13 of this Policy shall be considered corrupt practices when committed:

1. Directly or indirectly
2. Personally or through intermediaries
3. In any form, including the receipt or provision of money, valuables, property, services, and/or any property-related or non-property rights.

15. The Bank and its employees are strictly prohibited from:

1. Directly or through intermediaries offering, promising, approving, or providing money, securities, property (including but not limited to gifts (except for the cases specified in clause 21 of this Policy), reimbursement of expenses, discounts, entertainment, or any financial or other benefit or advantage), or the unlawful provision of property-related services or rights, to any government or municipal official, or to a representative of any organization, in order to influence their actions (or inaction) and/or to obtain an improper advantage
2. Directly or through intermediaries demanding, agreeing to receive, or receiving payments in the form of money, securities, property, services, property-related rights, or any other valuables or benefits, where the condition of such payment, benefit, or advantage is the performance of duties in favor of the provider, or where such payments, benefits, or advantages constitute direct or indirect compensation for the performance of such duties
3. Engaging in bribery or commercial kickbacks as intermediaries, i.e., directly delivering a bribe on behalf of the giver or recipient, or otherwise facilitating or arranging agreements between them regarding the giving or receiving of a bribe or kickback
4. Any other unlawful use of official position, contrary to the legitimate interests of the Bank, for the purpose of securing financial or other benefits/advantages.

16. The Bank shall not engage agents, consultants, or any third parties to make payments or undertake actions that would violate the anti-corruption laws of the Kyrgyz Republic, or that could create reputational risk for the Bank or its employees in the course of their duties.

17. Employees of the Bank, in the performance of their official duties, are required to:

1. Avoid situations that may give rise to conflicts of interest, and when making decisions within their official responsibilities, act solely in the interests of the Bank
2. Refrain from using their position or access to information for personal benefit or for the benefit of related parties
3. Promptly disclose any personal circumstances that may create an actual or potential conflict of interest, including upon hiring or appointment to a new position.

18. Employees of the Bank must inform the head of their department of any actual or potential conflict of interest encountered in the course of their official duties, in accordance with the Bank's Conflict of Interest Regulation.

5. Business Gifts and Hospitality

18. Bank employees are not permitted to give or accept gifts in connection with their work at the Bank. Exceptions may apply where giving or receiving gifts is part of established business practice or customary business etiquette, provided this is consistent with paragraph 21 of this Policy, the Bank's Conflict of Interest Regulation, and other internal regulations of the Bank.
19. Bank employees and their immediate family members are prohibited from accepting from clients or counterparties any material benefit, gift, or service in exchange for actions (or omissions) by the employee that benefit the provider. This prohibition applies where such actions (or omissions) fall within the employee's official duties or where, by virtue of their position, the employee could otherwise influence such actions (or omissions).
20. Gifts that Bank employees may provide on behalf of the Bank to third parties, or receive in connection with their work from third parties, must meet the following criteria:

1. Be directly related to the Bank's business objectives
2. Not constitute a concealed reward for action (or inaction), granting of rights, provision of services, entering into or approving a transaction, obtaining a permit, or any attempt to improperly or unethically influence the recipient
3. Be reasonable, proportionate, and not of a lavish or extravagant nature.

21. The Bank prohibits gifts made on behalf of the Bank and/or its employees (acting in their official capacity) to third parties in the form of cash or non-cash equivalents (in any currency), securities, precious metals, gemstones, as well as benefits or services such as entertainment, travel expenses, loans, discounts, use of property, or other advantages.
22. The Bank strictly prohibits offering or giving any gifts, regardless of value, to individuals performing supervisory, audit, or regulatory functions with respect to the Bank.
23. The Bank strictly prohibits providing any gift to a government or municipal official where acceptance of such a gift could place that official in a conflict of interest.
24. Modest, symbolic promotional items may be given to clients and counterparties of the Bank.
25. The Bank may engage in business hospitality, including various corporate events, provided that such activities do not create any reciprocal obligations on the part of the invitee and do not impair the objectivity of their business judgment or decision-making.
26. Bank employees, whether acting as host or guest, must not participate in hospitality events that are unlawful, could reasonably be perceived as a bribe or kickback, or could otherwise be considered offensive to public standards of ethics or morality.

6. Compliance with Anti-Corruption Laws and This Policy

28. The Bank maintains a robust internal control framework and implements a comprehensive set of measures to prevent corruption. These measures are risk-based, aligned with international standards, designed to limit opportunities for corrupt conduct, and enable the Bank to identify such conduct promptly.

29. Members of the Board of Directors and all Bank employees, regardless of their position or length of service, are required to strictly comply with the anti-corruption laws of the Kyrgyz Republic, this Policy, and the Bank's professional standards of ethics.
30. Employees are personally accountable for complying with applicable anti-corruption laws and this Policy, and for any actions (or omissions) that violate the principles and requirements set out therein.
31. Any violation of anti-corruption laws or this Policy is treated by the Bank as a serious offense. Such violations may result in disciplinary action, as well as criminal, administrative, or other liability under the laws of the Kyrgyz Republic, initiated by the Bank, law enforcement authorities, or other authorized parties, in accordance with applicable legislation and the Bank's internal regulations.
32. Employees must clearly and unequivocally refuse any form of improper inducement offered by colleagues or third parties. Any such offer or attempt must be reported immediately to the Compliance Control Department or to the employee's direct supervisor.
33. Each employee is required to review this Policy and provide a signed written acknowledgement of their commitment to comply with it, using the form provided in Appendix 1. The signed acknowledgement is kept in the employee's personnel file.
34. The Bank guarantees that no employee will be penalized for refusing to participate in corrupt practices, even if such refusal results in the Bank losing a commercial opportunity, competitive advantage, or incurring a financial loss that could only have been avoided through unlawful means and by breaching the anti-corruption law of the Kyrgyz Republic and this Policy.
35. Employees who are uncertain whether their actions comply with applicable anti-corruption laws or this Policy must seek guidance from the Compliance Control Department or from the head of their business unit.
36. The Bank takes reasonable measures to ensure that individuals with known involvement in corruption are not appointed to leadership positions.
37. To minimize corruption risks, the Bank conducts due diligence on the business reputation and integrity of prospective employees, clients, counterparties, and other relevant parties, including their shareholders and beneficial owners, in line with established internal procedures. This includes reviewing publicly available negative information.
38. The Bank includes mandatory anti-corruption clauses in contracts with counterparties, encourages counterparties to maintain internal anti-corruption procedures, and supports their adherence to internationally recognized anti-corruption standards.
39. The Bank regularly conducts internal and external audits of its financial and business activities, verifying the completeness and accuracy of accounting records and ensuring compliance with applicable laws and internal regulations.
40. To foster a strong culture of integrity, the Bank provides regular training for employees on corruption prevention and anti-corruption practices.

7. Reporting Corruption Violations

41. If Bank employees have reasonable grounds to suspect that corruption, a conflict of interest, or misuse of Bank services for corrupt purposes has occurred or may occur, they must promptly report the suspected violation, together with supporting details, to the Bank's Compliance Control Department or to their immediate supervisor, unless the suspicion concerns that supervisor.

If a potential or actual conflict of interest arises that could give rise to corruption, the employee must notify the Compliance Control Department via the dedicated corporate email address compliancehotline@bakai.kg or inform their immediate supervisor no later than the next business day.

42. The Bank encourages clients, counterparties, and other stakeholders who are not Bank employees to report any reasonable suspicion of corruption or conflict of interest. Such reports may be submitted to the Bank via compliancehotline@bakai.kg .
43. The Bank ensures the confidential handling of all reports, which are registered on the day of receipt, and guarantees that individuals who in good faith provide information or reasonable suspicions of misconduct will be protected from retaliation, harassment, or any other adverse consequences.
44. Managers of the Bank's structural units are personally accountable for obstructing employees from reporting reasonable suspicions of corruption, or for taking disciplinary or other adverse measures against employees for submitting such reports.
45. For each reasonable suspicion of corruption, the Bank initiates an internal investigation in accordance with the laws of the Kyrgyz Republic and the Bank's internal policies.
46. If an internal investigation confirms a corruption incident, the review process concludes with corrective action consistent with the Bank's zero-tolerance principle, up to and including termination of employment and referral of the matter to the competent state authorities.
47. Failure to take timely action on substantiated suspicions or confirmed incidents of corruption may result in disciplinary sanctions against the responsible employees of the Bank.
48. The Bank commits to reporting corruption offenses it becomes aware of to law enforcement authorities and to cooperating with their authorized representatives during efforts to prevent or investigate corruption-related crimes.
49. Bank employees are required to fully cooperate with investigations related to violations of the anti-corruption laws of the Kyrgyz Republic and this Policy, including by providing all documents necessary to verify the facts underlying such violations.

8. Oversight of Policy Implementation

50. The Board of Directors oversees the overall effectiveness of the implementation and application of this Policy.
51. ***The Management Board*** of the Bank shall:
- exercise general oversight of employee compliance with the requirements of this Policy
- report to the Board of Directors on the measures taken to ensure that the Bank's operations comply with the principles and requirements of this Policy and with the anti-corruption laws of the Kyrgyz Republic.

52. ***The Compliance Control Department*** shall:
- monitor the alignment of this Policy with applicable legislation and regulatory legal acts of the Kyrgyz Republic on anti-corruption
- make recommendations on the organization and adoption of appropriate measures to mitigate corruption risks
- review information submitted by employees and other stakeholders to compliancehotline@bakai.kg regarding violations of this Policy or suspected corruption
- initiate internal investigations of potential corruption matters, as warranted
- propose amendments to this Policy when required by changes in the anti-corruption laws of the Kyrgyz Republic or for other valid reasons
- contribute to the development of training programs for Bank employees on anti-corruption issues
- perform other actions within its mandate.

53. ***Department of Economic Security*** shall:
- take measures to identify and prevent corrupt conduct by Bank employees
- monitor compliance by Bank employees with restrictions, prohibitions, and obligations established by the Bank's internal policies aimed at preventing and combating corruption

- participate, as authorized, in internal investigations of corruptionAs part of efforts to identify and manage compliance risks, it submits monthly reports to the Compliance Control Department regarding the detection and prevention of corrupt practices, as well as the results of anti-corruption efforts, in accordance with the Bank's internal regulations.

54. ***The Human Resources Department*** shall:

- upon hiring, receives a written acknowledgment of their commitment to comply with this Policy (Appendix 1) from employees. The signed acknowledgment is retained in the employee's personnel file
- take measures to identify conflicts of interest and fulfill the requirements of the Bank's Conflict of Interest Regulation
- through its Training Center, deliver anti-corruption training for employees, including orientation training for new hires, and provide the Compliance Control Department with information confirming delivery of such training. The Training Center, in cooperation with the Compliance Control Department, develops the Bank's anti-corruption training program.

55. The Internal Audit Department conducts periodic reviews of the Bank's internal control system to assess its compliance with this Policy and periodically evaluates the effectiveness of the Bank's anti-corruption framework.

56. Heads of business units are responsible for monitoring compliance with this Policy by employees under their direct supervision.

57. Business units identify corruption risks associated with their functional areas and provide relevant information on such risks to the Compliance Control Department.

58. In the event of organizational restructuring, the relevant functions described in this Policy must perform by the units to which such responsibilities are reassigned.

10. Final Provisions

59. This Policy is published on the Bank's corporate official website in open access.

60. This Policy is intended for mandatory review and executionby all governing bodies of the Bank, including the Board of Directors, as well as all business units and employees of the Bank.

61. This Policy enters into force on the date of approval by the Board of Directors of the Bank, unless the Board specifies a different effective date in its resolution.

62. This Policy is subject to regular review to ensure its continued relevance and compliance with the anti-corruption laws of the Kyrgyz Republic and with international anti-corruption practices that do not conflict with the laws of the Kyrgyz Republic.

63. On all matters not addressed in this Policy, the Bank shall be guided by the laws of the Kyrgyz Republic and the Bank's internal policies and procedures.

64. In the event that any provision of this Policy conflicts with amendments to the laws of the Kyrgyz Republic, the applicable laws shall prevail until the Policy is updated accordingly.

First Deputy
Chairman of the Management Board **M. S. Kakeev**

Appendix 1
to the Anti-Corruption Policy of BAKAI BANK OJSC

Employee Acknowledgment of Compliance with the Anti-Corruption Policy of BAKAI BANK OJSC

I hereby acknowledge that I have read and understood the Anti-Corruption Policy of BAKAI BANK OJSC.

I undertake to comply in good faith with the requirements set forth under the anti-corruption laws of the Kyrgyz Republic and the Anti-Corruption Policy of BAKAI BANK OJSC.

I am informed that all employees of BAKAI BANK OJSC, including myself, are strictly prohibited from directly or indirectly, personally or through third parties, engaging in any corrupt or fraudulent activity. This includes offering, giving, promising, soliciting, or receiving bribes; acting as an intermediary in corrupt practices; or abusing one's official position or authority.

I acknowledge my obligation to report any reasonable suspicion of corrupt conduct involving other employees of BAKAI BANK OJSC, its counterparties, or any third parties interacting with the Bank.

I am aware that BAKAI BANK OJSC cooperates with law enforcement authorities in the fight against corruption and provides them with all relevant information concerning identified instances of corruption.

I further understand that violations of the anti-corruption laws of the Kyrgyz Republic or of the Anti-Corruption Policy of BAKAI BANK OJSC may subject me to disciplinary measures, criminal prosecution, and/or other forms of liability

_____
Full Name

_____
Title

_____
Signature / Date