Approved
by the Board of Directors of
Eurasian Bank JSC
Minutes No. 32
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for internal use

THE SUSTAINABILITY POLICY

THE POLICY

The Sustainability Policy (hereinafter referred to as the Policy) is developed in accordance with the legislation of the Republic of Kazakhstan, including the Rules for the Formation of Risk Management and Internal Control System for Second-Tier Banks, Branches of Non-Resident Banks of the Republic of Kazakhstan, approved by Resolution No. 188 of the Management Board of the National Bank of the Republic of Kazakhstan dated 12 November 2019, and the internal normative documents (hereinafter referred to as the INDs) of Eurasian Bank JSC (hereinafter referred to as the Bank).

Section 1. GENERAL PROVISIONS

Chapter 1. Goals and objectives. Terms and definitions

1. The purpose of the Policy development is to define the Bank's goals, objectives and principles in the field of sustainability, including the integration of environmental, social and governance (hereinafter referred to as the ESG) factors into the Bank's strategy, corporate governance, business processes and INDs.

2. The objectives of the Policy are:

1) formalizing the Bank's commitments in the field of sustainability;

2) identifying the Bank's priority areas of activity in the field of ESG;

3) establishing the roles and responsibilities of authorized collegial bodies and structural subdivisions of the Bank;

4) defining approaches to integrating ESG factors into risk management, the lending process, and the product line;

5) forming the principles of interaction with stakeholders;

6) determining information disclosure requirements in the field of sustainability.

3. The following concepts and abbreviations are used in the Policy:

1) ESG factors are environmental, social and governance aspects that are taken into account in the implementation of activities and decision-making in order to ensure the sustainability and long-term value of the Bank;

2) GRI (Global Reporting Initiative) is an international reporting standard in the field of sustainability that sets out the principles, structure, and requirements for disclosure of non-financial information about the economic, environmental, and social aspects of organizations' activities.

3) IFRS S1 / IFRS S2 (International Financial Reporting Standards - Sustainability Disclosure Standards) are international standards for disclosure of information in the field of sustainability, approved by the International Sustainability Standards Board, which establish requirements for disclosure of material information on the impact of sustainability factors and climate risks on the financial position and performance of an organization.

4) SASB (Sustainability Accounting Standards Board) are the reporting standards of the Sustainability Accounting Standards Board, which establish industry indicators and principles for disclosing information about significant environmental, social and governance factors that affect the financial performance of organizations.

5) Stakeholders are individuals or legal entities, groups or institutions whose interests may be affected by the activities of the Bank or its customers;

6) Responsible financing is the practice of providing financial services taking into account environmental and social risks and the impact on society;

7) The regulator is the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market and/or the National Bank of the Republic of Kazakhstan;

8) Authorized collegial bodies – the Bank's Board of Directors, the Bank's Management Board, and the Bank's collegial working bodies;

9) Sustainability is development that ensures a balance between economic growth, social justice and environmental protection for the benefit of present and future generations;

10) The Sustainability Goals are the goals approved by the United Nations for the period up to 2030.

4. According to the Bank's process card, the owner of the L1 Strategic Management process is the Strategic Planning and Sustainability Division.

Section 2. SPECIAL PROVISIONS

Chapter 1. The Bank's approach to sustainability

5. The Bank considers sustainability as a strategic priority, ensuring a balance between financial results, social responsibility and environmental impact, as well as contributing to long-term development and building trust among stakeholders.

6. The Bank's approach to sustainability is based on the following principles:

1) The principle of transparency and accountability – the Bank ensures reliable, timely and comparable disclosure of information on sustainability activities in accordance with national and international standards (GRI, IFRS S1/S2, SASB and others). Information disclosed in non-financial reports, public communications and in interaction with the Regulator reflects the actual results achieved in the field of environmental protection, social responsibility and corporate governance. The Bank establishes an internal accounting and reporting system on sustainability topics that ensures transparent allocation of responsibilities and control over the completeness and reliability of disclosed information.

2) The principle of responsible financing - the Bank takes into account environmental and social factors when reviewing financing applications by applying ESG screening, categorization and comprehensive risk assessment procedures in accordance with the INDs and regulatory requirements. The Bank's financial activities are aimed at supporting projects that provide positive environmental and social impacts, as well as at preventing the financing of activities that may have an adverse impact on the environment or society. The Bank develops financial products and services aimed at supporting projects that comply with the principles of sustainability and contribute to the creation of long-term social and environmental value.

3) The principle of inclusivity and equal opportunity – in its interaction with customers, the Bank ensures equal terms for the provision of financial and non-financial products and services, improves the service delivery system with due consideration of the needs of various population groups and contributes to expanding their access to financial resources. In its interaction with employees, the Bank is guided by the principles of equality, respect and diversity, creating conditions for the development of professional competencies and the realization of employees' potential.

4) The principle of compliance with legislation and regulatory requirements – the Bank operates in strict compliance with the legislation of the Republic of Kazakhstan, regulatory legal acts of the Regulator, as well as the Bank's INDs. Compliance with these requirements is mandatory for all employees of the Bank.

5) The principle of ethical conduct and business integrity – the Bank operates on the basis of honesty, integrity, respect for the law and compliance with professional ethical standards. The Bank combats corruption and unfair practices, prevents conflicts of interest, and protects the rights and legitimate interests of customers, employees, and partners. Ethical standards are enshrined in the **Code of Ethics and Business Conduct**, as well as other internal documents that are mandatory for all employees of the Bank.

7. The Bank prioritizes the following United Nations Sustainability Goals (hereinafter referred to as the SDGs) and their corresponding objectives relevant to the nature of the Bank's activities:

1) SDG 3. Good health and well-being:

– Objective 3.d: Strengthen the capacity of all countries, in particular developing countries, for early warning, risk reduction and management of national and global health risks.

2) SDG 4. Quality education:

– Objective 4.4: By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.

3) SDG 5. Gender equality:

– Objective 5.1: End all forms of discrimination against all women and girls everywhere;

– Objective 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

4) SDG 8. Decent work and economic growth:

– Objective 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value;

– Objective 8.10: Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.

5) SDG 13. Climate change:

– Objective 13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries;

– Objective 13.2: Integrate climate change measures into national policies, strategies and planning.

6) SDG 16. Peace, justice and efficient institutions:

– Objective 16.5. Substantially reduce corruption and bribery in all their forms.

Chapter 2. The Bank's main activities in the field of sustainability

8. The main areas of the Bank's activities in the field of sustainability determine the key priorities for the implementation of the ESG principles and reflect practical measures to achieve the Bank's strategic goals in this area.

9. The main areas of the Bank's sustainability and their components:

1) Responsible financing:

– Implementation of an environmental and social risk management policy in the Bank processes, which takes into account ESG factors when reviewing financing applications and making loan decisions;

– Development of a line of ESG products focused on supporting projects with positive environmental and social impacts;

– Increasing the share of ESG products and sustainable financial instruments in the Bank's loan and investment portfolio;

– Development of employees' competencies in identifying and assessing environmental and social risks as part of credit analysis and financing decision-making;

– Providing customers with methodological and advisory support in implementing ESG practices and managing environmental and social risks.

2) Reducing environmental impact:

– Organization of accounting and control of direct and indirect greenhouse gas emissions resulting from the Bank's activities;

– Implementation of measures aimed at improving resource efficiency, including modernization of engineering systems (lighting, heating, air conditioning), optimization of paper and plastic consumption, as well as reduction of waste generation;

– Development of the Green Office initiative and implementation of internal programs aimed at shaping environmentally responsible employee behavior;

– Promotion of the principles of environmental responsibility and rational consumption in working with the Bank's customers and partners;

– Participation in national and international initiatives that contribute to reducing the negative impact on the environment.

3) Human rights:

– Ensuring the protection of human rights in the course of the Bank's activities in accordance with the requirements of the legislation of the Republic of Kazakhstan and international principles of responsible business conduct;

– Respect for the principles of equal opportunity and non-discrimination on any grounds;

– Increasing the availability of financial services for socially vulnerable population groups through the development of digital solutions and adaptation of customer services;

– Maintaining an effective information security system and protecting the personal data of customers, employees and partners;

– Ensuring the availability of effective feedback channels on human rights, equal opportunity, and business ethics.

4) Responsible work practice:

– Compliance with the requirements of the labor legislation of the Republic of Kazakhstan and the development of responsible labor relations management practices;

– Ensuring safe and comfortable working conditions that promote the health and well-being of employees;

– Upholding the principles of equal opportunities and non-discrimination in personnel policy, remuneration and employee promotion;

– Creating conditions for the development of competencies and professional growth of employees through training and professional development programs;

– The introduction of feedback mechanisms for employees, providing for the possibility of anonymous reporting of ethical violations, discrimination and other unlawful actions.

5) Business ethics:

– Compliance with the principles of honesty, responsibility and ethical business conduct in all aspects of the Bank's activities;

– Combating corruption, preventing conflicts of interest and preventing unfair practices;

– Ensuring transparency of business processes and accountability in making governance and financial decisions;

– Application of standards for the secure and confidential use of information resources and digital technologies;

– Interaction with suppliers and partners based on the principles of cooperation, respect and trust.

6) Improving corporate governance:

– Development and implementation of the Bank's sustainability strategy, which is an integral part of its long-term development strategy;

– Allocation of roles and areas of responsibility of the authorized collegial bodies and structural subdivisions for the implementation of the Policy and other measures in the field of sustainability;

– Updating the INDs, taking into account the requirements in the field of sustainability and international best practices;

– Organization of training and professional development programs for members of authorized collegial bodies and employees of the Bank on sustainability topics and integration of ESG factors into the Bank's activities;

– Ensuring full, reliable and timely disclosure of information in the field of sustainability in accordance with the international standards and national reporting requirements.

7) Following international and national guidelines for sustainability;

– Bringing the Bank's activities in line with international sustainability goals and priorities, including the SDGs;

– Alignment of the Bank's activities with the national strategic priorities and programs of the Republic of Kazakhstan in the field of sustainability and the green economy;

– Expansion of cooperation with national and international organizations to exchange experience and implement best practices for sustainability.

Chapter 3. Stakeholder engagement

10. The Bank recognizes stakeholder engagement as an essential component of its sustainability management system.

11. As part of implementing the principles of sustainability, the Bank identifies the following key stakeholder groups, as well as the objectives and mechanisms of engagement with them:

Stakeholders	Goal of interaction	Mechanism of engagement
Shareholders and investors	– Ensuring transparency of corporate governance; – Providing reliable and timely information on financial and operational results; – Strengthening the trust and investment attractiveness of the Bank.	– General Meeting of Shareholders; – Written information requests; – Quarterly and annual reports, including financial statements; – Press releases and information materials for investors.

Stakeholders	Goal of interaction	Mechanism of engagement
Employees	– Ensuring awareness of the goals, objectives and changes in the Bank's activities; – Maintaining an open dialogue on working conditions and professional development; – Increasing staff satisfaction and motivation; – Timely response to suggestions and feedback from employees.	– Personal consultations with top management; – Corporate website; – Contact Center; – Quarterly and annual reports, including financial statements; – Press releases; – Social network; – Employee engagement surveys and studies.
Customers	– Increasing satisfaction with the quality of service; – Timely notification of new products, changes and risks; – Taking into account customer needs when developing financial solutions; – Getting feedback to improve the services.	– Contact Center; – Corporate website; – Social network; – Press releases; – Customer satisfaction surveys and studies; – Quarterly and annual reports; – Consultations at the Bank Outlets.
Suppliers and partners	– Maintaining sustainable and mutually beneficial business relationships; – Compliance with contractual obligations and standards of business ethics; – Coordination of expectations on quality, terms and conditions of deliveries.	– Meetings and conference calls; – Corporate website; – Press releases.
Society	– Strengthening public confidence in the Bank's activities; – Improving the level of financial literacy of the population; – Support for socially significant initiatives and charitable projects; – Promoting the sustainability of the regions where the Bank operates; – Formation of a positive image and reputation as a responsible institution.	– Charitable programs and social initiatives; – Corporate website; – Press releases; – Contact Center; – Email.
Government agencies, regulators	– Participation in the improvement of industry regulation and financial policy; – Timely provision of mandatory reporting and disclosure of information; – Assistance in the implementation of government programs and initiatives.	– Regular reporting, including financial statements; – Profile meetings and forums; – Legally established channels of fiscal interaction (payments and taxes).

Stakeholders	Goal of interaction	Mechanism of engagement
Mass media	– Increasing the recognition and strengthening the reputation of the Bank; – Timely information about key events, initiatives and results; – Preventing the dissemination of false information and managing reputational risks.	– Corporate website; – Press releases; – Press conferences and briefings; – Social network.

12. The results of stakeholder engagement are taken into account in the following processes:
1) development and updating of the Bank's INDs;
2) improving the corporate governance system and HR processes;
3) development of product solutions and improvement of customer service quality;
4) implementation of social and community initiatives;
5) preparation of public reports in the field of sustainability.

Chapter 4. Sustainability management system

1) The organizational structure of the Bank's sustainability management system distributes powers on environmental, social and corporate responsibility topics between the authorized collegial bodies and structural subdivisions of the Bank, ensuring effective interaction in the implementation of strategic goals and objectives in the field of sustainability. The sustainability management system includes the following levels:
2) The Board of Directors;
3) Committees under the Board of Directors;
4) The Management Board;
5) The Strategic Planning and Sustainability Division (hereinafter - the SPSDD);
6) The Risk Management Block;
7) Structural subdivisions that ensure the performance of functions in the field of sustainability within their competence.

13. The Board of Directors approves the INDs governing the process of sustainability and the process of environmental and social risk management. The Board of Directors monitors and controls the implementation of these documents, including through the authorized collegial bodies of the Bank, and ensures reliable and timely disclosure of information on sustainability topics.

14. The Committees under the Board of Directors carry out management and control within the limits of their powers in accordance with the approved regulations:

1) The Risk and Internal Control Committee oversees the functioning of the system for managing material risks, including ESG risks, as well as the operations of the system for managing environmental and social risks; reviews the Bank's proposed organizational structure to ensure the establishment and proper functioning of the system for managing environmental and social risks, as well as the allocation of relevant duties and responsibilities; reviews the draft of the Bank's development strategy and other ESG-related policy documents, monitors their implementation, and conducts a preliminary review of the sustainability report prior to its submission to the Board of Directors for approval;

2) The Remuneration Committee reviews the draft organizational structure of the Bank, including those related to ESG risks, in order to manage conflicts of interest;

3) The Strategic Planning and Social Affairs Committee reviews the Bank's draft development strategy and documents submitted to the Board of Directors containing information on the implementation of the development strategy, development plans, and achievement of objectives for the Bank's strategic key performance indicators before submitting them for approval by the Board of Directors.

15. The Management Board organizes the implementation of the Policy, as well as a set of policies for environmental and social risk management. Within the scope of its competence, the Management Board ensures the development of internal procedures for making decisions on the acceptability of environmental

and social risks in important and high-risk projects before concluding a bank loan agreement, as well as the procedure for refusing to carry out loan operations with high environmental and social risks. The Management Board organizes the integration of the principles of sustainability into internal processes and management practices, forms a data collection system for reporting and ensures the timeliness and reliability of disclosed information in accordance with the requirements of the Regulator and international standards.

16. The SPSDD ensures the implementation of the principles and practices of sustainability in the Bank's activities. Within the scope of its competence, the SPSDD develops the INDs on sustainability topics, with the exception of documents regulating the management of environmental and social risks in lending to customers and the functioning of the risk management system. The SPSDD organizes the process of preparing reports on sustainability, ensures the provision of information in the field of ESG for review and/or approval by the authorized collegial bodies of the Bank, and also organizes training and professional development programs of employees of the Bank on sustainability, environmental and social risks with regular updating of the content of relevant programs.

17. The Risk Management Block ensures the efficient functioning of the Bank's risk management system, including environmental and social risk management. The Block develops and implements the risk management system for these risks, organizes their comprehensive assessment, including verification of compliance with established requirements and risk categorization, and analyzes the results obtained.

18. The Bank's structural subdivisions involved in the implementation of ESG initiatives ensure the implementation of measures stipulated in the sustainability action plan, as well as the integration of ESG factors into business processes.

19. The mechanisms for implementing the Bank's sustainability management system are processes, procedures and initiatives aimed at ensuring the integration of ESG principles into all aspects of the Bank's activities. These include:

1) strategic and operational planning of the Bank's activities, taking into account the principles of sustainability;

2) formation and improvement of the organizational structure of sustainability management, including the allocation of functions, roles and powers;

3) development and updating of the internal normative framework and methodology in all areas of ESG activities;

4) organization of a system for collecting, storing and analyzing data necessary to disclose the results of activities in the field of sustainability;

5) conducting regular training and professional development of the employees on sustainability and ESG topics;

6) development of stakeholder engagement mechanisms, ensuring regular dialogue and exchange of information in the field of sustainability.

20. The improvement of the sustainability management system is carried out in stages, with an emphasis on improving the efficiency of corporate governance, strengthening the role of structural subdivisions responsible for ESG areas, developing non-financial disclosure practices, as well as introducing environmental and social criteria into the Bank's strategic and operational decisions.

Chapter 5. Monitoring and reporting

21. In order to ensure transparency and accountability in the field of sustainability, the Bank monitors the implementation of this Policy through the preparation and disclosure of annual ESG reports.

22. The Bank's annual ESG reports reflect the results of its activities and achievements in the field of sustainability, including information on environmental, social and governance aspects, as well as the Bank's contribution to achieving the SDGs.

23. ESG reports are prepared in accordance with the requirements of the Regulator set out in the Guidelines on Disclosure of Information in the Field of Climate and Sustainability for Banks and Other Financial Institutions, as well as taking into account international non-financial reporting standards (GRI, IFRS S1/S2, SASB and others).

24. ESG statements are published on the Bank's corporate website not later than 30 August of the year following the reporting period, and are the main form of disclosure of non-financial information.

25. ESG-reporting is approved by the Bank’s Board of Directors and serves as a tool for informing on the progress of the implementation of the Sustainability Goals.

Section 3. FINAL PROVISIONS

26. The responsibility for non-fulfillment or improper fulfillment of the Policy requirements lies with the heads of the Bank’s structural subdivisions, within their competence and participation in the implementation of sustainability activities.
27. The Management Board of the Bank is responsible for the development and implementation of the Policy. The Risk and Internal Control Committee and the Bank’s Board of Directors are responsible for monitoring the implementation of the Policy.
28. The Policy comes into force on the next business day after it is published in the Bank’s INDs database and is mandatory for all employees of the Bank.
29. Amendments and additions to the Policy are made as required in accordance with the requirements of the legislation of the Republic of Kazakhstan, regulatory legal acts of the Regulator and the Bank’s INDs.
30. Topics unresolved by the Policy are subject to resolution in accordance with the legislation of the Republic of Kazakhstan and the Bank’s INDs.

LIST OF CHANGES AND ADDITIONS

s.i. No.	Minutes No.	Minutes date	Effective date	Initiator of changes
1.				
2.				
3.				