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**Record keeping index: 10-14-10/35**

Agreed by the  
Management Board of  
Industrial and Commercial  
Bank of China (Almaty)  
JSC dated "14" of June  
2023 (minutes No.19)

Agreed by the Strategic Planning  
and Risk Management Committee  
of the Industrial and Commercial  
Bank of China (Almaty) JSC  
dated "31" of July 2023 (minutes  
No.08-2023)


Approved by the Board of  
Directors of Industrial and  
Commercial Bank of China  
(Almaty) JSC dated "25" of  
August 2023 (minutes No.  
7)

**Anti-Bribery and Corruption Policy**  
**Industrial and Commercial Bank of China (Almaty) JSC**

**Almaty, 2023**

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## **Chapter 1. General provisions**

1. This Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the legislation of the Republic of Kazakhstan, the regulatory legal acts of the Republic of Kazakhstan regulating the formation of a risk management and internal control system for second-tier banks, standards of the ICBC Group, internal documents of the Industrial and Commercial Bank of China (Almaty) JSC (hereinafter - the Bank) and methodological recommendations of the Committee of Sponsoring Organizations of the Treadway Commission (hereinafter - COSO).

2. This Anti-Bribery and Corruption Policy is aimed at preventing possible actions of a corrupt nature, creating an atmosphere of rejection of corruption.

3. The provisions of this Policy contain generally binding norms and rules that apply to officials, employees of the Bank, regardless of their position, functions performed and the period of their work and are mandatory for strict execution and compliance.

4. Each employee and official of the Bank is responsible for compliance with the provisions of this Policy. Failure to comply with this Policy by an employee, officer of the Bank may result in disciplinary or other types of liability (criminal, administrative) in accordance with the legislation of the Republic of Kazakhstan.

5. The main goal of this Policy is to form a legal culture of the Bank's employees that rejects corruption and ensures the principles of honesty and integrity in the performance of their duties.

1. The policy provides for the solution of the following tasks:


- 1) implementation of a unified policy in the field of combating corruption;
- 2) formation of an understanding among officials and employees of the Bank of zero tolerance for any manifestations of corruption;
- 3) formation of a culture of ethical behavior and intolerance towards all manifestations of corruption, including a single standard of anti-corruption behavior among the Bank's employees;
- 4) creation of effective mechanisms, control and other measures aimed at counteracting corrupt practices and minimizing the risks of involving the Bank, as well as its employees in corrupt activities;
- 5) education of the Bank's employees in strict compliance with anti-corruption legislation, as well as internal regulations governing the activities of the Bank in the field of combating corruption;
- 6) preventing the presence of corruption factors in the internal documents of the Bank;
- 7) ensuring openness, fair competition and objectivity in the performance of work and provision of services;
- 8) the application of measures of responsibility for the commission of corrupt acts.

2. The main principles of anti-corruption in the Bank are:

1) zero tolerance for any manifestations of corruption, abuse and dishonest behavior - the Bank adheres to the principle of complete rejection of corruption in all forms and manifestations in the course of its activities. The principle of zero tolerance for any manifestations of corruption means a strict prohibition for officials and employees of the Bank acting on behalf of the Bank or in its interests, directly or indirectly, personally or through any mediation, to participate in corrupt practices;

2) the commitment of the management - members of the Board of Directors and the Management Board of the Bank must declare an uncompromising attitude to any form of manifestation of corruption and at all levels, demonstrate, observe and implement this principle by personal example;

3) involvement of employees - the Bank informs its officials and employees about the provisions of the anti-corruption legislation of the Republic of Kazakhstan and welcomes their

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active participation in the formation and implementation of anti-corruption procedures;

4) inevitability of punishment - the Bank declares the inevitability of punishment of the Bank's employees regardless of their position, length of service and other conditions in case they commit corrupt acts in the performance of their official duties;

5) legality - the Bank strictly complies with the anti-corruption legislation of the Republic of Kazakhstan, and any of its actions or omissions do not contradict the norms of the applicable anti-corruption legislation;

6) due diligence - the Bank checks third parties and job candidates before making a decision to start or continue business / labor relations for their reliability, rejection of corruption and the absence of a conflict of interest;

7) interaction and coordination - the Bank ensures interaction and cooperation in the field of anti-corruption activities with state bodies, as well as coordination of actions in the process of combating corruption.

6. The Bank makes every effort to prevent corruption and other illegal actions in order to obtain or retain unjustified benefits and advantages, both on the part of stakeholders and on the part of officials and employees.

7. The corporate culture of the Bank is based on the ethical conduct of activities and the implementation of measures to combat various offenses, including corruption, against the Bank, both on the part of the employees of the Bank itself and on the part of third parties.

8. The Bank's officials are directly responsible for combating corruption.

9. Employees are obliged to bring to the attention of the management about cases of corruption offenses that have become known to them.

10. The business owner of this Policy is the Compliance and Internal Control Department.

11. This Policy uses the concepts provided for by the internal documents of the Bank, as well as the following concepts:

1) Anti-Bribery and Corruption Policy (anti-corruption policy) - activities aimed at creating an effective system for combating corruption and reducing corruption risks;

2) close relatives - parents (parent), children, adoptive parents (adopters), adopted (adopted), full and half brothers and sisters, grandfather, grandmother, grandchildren, under relatives - full and half brothers and sisters, parents and children of the spouse (spouses);

3) internal analysis of corruption risks - the activities of the Bank to identify and study the causes that contribute to the commission of corruption offenses;

4) Hotline ([hotline@kz.icbc.com.cn](mailto:hotline@kz.icbc.com.cn)) is a confidential information channel for employees of the Bank, external parties, including customers, counterparties, counterparties of the Bank, designed to receive information about:

- potential or actual facts of corruption, fraud;
- violations during procurement procedures;
- violations of the law;
- abuse of official position, abuse of authority by officials;
- intentions or facts of committing illegal actions in the field of conflict of interest control;


- violations of legislation in the field of insider information;
- non-compliance with the Code of Corporate Ethics, about actions (inaction) that cause or may cause material damage or harm the business reputation of the Bank.

5) ICBC Group - Parent Bank and its branches and subsidiaries;

6) an official of the Bank - a member of the Management Board and the Board of Directors of the Bank;

7) abuse - an act consisting in a conscious, illegal and mercenary using one's rights to the detriment of others;

8) abuse of authority - the use by a person empowered to make decisions in the Bank, or another organization, of his powers contrary to the legitimate interests of the Bank, or another

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organization and for the purpose of obtaining benefits and advantages for himself or other persons or other organizations or causing harm to other persons or organizations, if this act caused significant harm to the rights and legitimate interests of citizens or organizations or legally protected interests of society or the state;

9) counterparty - an individual or legal entity, institution or organization with which the Bank has concluded or plans to conclude a cooperation agreement (agreement);

10) conflict of interest - a situation in which a contradiction arises between the personal interest of the Bank's officials and (or) its employees and the proper performance of their official powers or property and other interests of the Bank and (or) its employees and (or) customers, which may lead to adverse consequences for the Bank and (or) its customers;

11) corruption - illegal use by officials (employees) of the Bank of their official (official) powers and related opportunities in order to obtain or extract personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons by providing benefits and benefits;

12) corruption risk - the possibility of occurrence of causes and conditions conducive to the commission of corruption offences;

13) gifts are a thing (goods, services, money) or any other benefits (property benefits, property rights, release from obligations, waiver of any right in favor of an official and (or) other employee of the Bank or his close relatives, granting discounts, loans, payment for entertainment, recreation, etc.),

14) hospitality expenses - expenses for business receptions and / or services for representatives of other organizations as an element of hospitality.

Hospitality expenses do not include expenses for organizing entertainment and recreation, prevention and treatment;

15) prevention of corruption - the activities of the Bank to study, identify, limit and eliminate the causes and conditions conducive to the commission of corrupt acts, by developing and implementing a system of preventive measures;

16) anti-corruption - the activities of the Bank, all its employees and officials, within their powers:

- to prevent corruption and acts of corruption, including the identification and subsequent elimination of the causes and conditions conducive to the commission of acts of a corruption nature (prevention of corruption);

- on prevention, detection, suppression, disclosure and investigation of actions of a corrupt nature, elimination of their consequences (fight against corruption).

17) employees of the Bank - any individual who has an employment relationship with the Bank, including members of the Management Board and the Board of Directors of the Bank;


18) an executive employee - the Chairman and members of the Board of Directors, the Chairman, his deputy and members of the Management Board, the chief accountant of the Bank, other managers of the Bank, who coordinate and (or) control the activities of the structural divisions of the Bank and have the right to sign documents on the basis of which banking Operations Chief Accountant, Deputy Chief Accountant;

19) sponsor - a person carrying out sponsorship activities;

20) sponsorship activities - activities of a sponsor to provide charitable assistance on the terms of popularization of the sponsor's name in accordance with the legislation of the Republic of Kazakhstan;

21) structural subdivision - a subdivision (department, department, department, sector, etc.) provided for by the organizational structure of the Bank, together with related employees and managers who perform the established range of duties and are responsible for the implementation of the tasks assigned to them;

22) third party - any individual or legal entity with whom the Bank/Bank employee interacts in the course of its activities/functions (including, but not limited to, counterparties,

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customers, business counterparties, agents, intermediaries, contractors, as well as other persons, including state bodies / local self-government bodies and their officials).

## **Chapter 2. Corrupt actions**

12. For the purposes of this Policy, acts of corruption are acts of corruption committed against the Bank or on behalf of or in the interests of the Bank, including against state bodies and their employees, or other persons authorized to perform public functions, or persons equated to them in accordance with Law of the Republic of Kazakhstan “On Combating Corruption”, other legal entities and their employees, management bodies and representatives of these legal entities.


13. The following actions are recognized as corrupt actions in accordance with this Policy:

- 1) abuse of authority;
- 2) providing a person authorized to perform state functions, or a person equated to him, or a person holding a responsible state position, or an official, as well as an official of a foreign state or an international organization personally or through an intermediary, a bribe in the form of money, securities, other property, property rights or property benefits for himself or other persons for actions (inaction) in favor of the bribe giver or persons represented by him, if such actions (inaction) are within the official powers of this person, or he, by virtue of his official position, can contribute to such actions (inaction), as well as for general patronage or connivance;
- 3) mediation in bribery - the direct transfer of a bribe on behalf of the bribe giver or bribe taker or other assistance to the bribe taker and / or bribe giver in reaching or implementing an agreement between them on receiving and giving a bribe;
- 4) commercial bribery - the illegal transfer of money, securities or other property to a person empowered to make decisions in the Bank or another organization, as well as the illegal provision of property services to him for the use of his official position, as well as for general patronage in the interests of bribery person;
- 5) bribery of civil servants - the provision or promise to provide a civil servant with any financial or other benefit/advantages in order to influence the performance of his/her official duties in order to obtain/retain business or provide competitive or other advantages for the Bank;
- 6) the use by the Bank's employees for themselves or for the benefit of third parties of opportunities related to their official position and (or) official powers to obtain financial or other benefits (advantages) not provided for by the legislation of the Republic of Kazakhstan and (or) internal documents of the Bank;
- 7) illegal use by an individual (including employees of the Bank) of his official position (official authority) contrary to the legitimate interests of the Bank in order to obtain financial benefits in the form of money, valuables, other property or services of a property nature, other property rights for himself or for third parties, other benefit/advantages, or illegal provision of such benefit to the specified person (including employees of the Bank) by other individuals;
- 8) provision or promise to provide any property and / or other benefit / advantage in order to induce a decision in favor of the person providing such benefit / advantage, or a person associated with him;
- 9) receipt, consent to receive, request to provide property and / or other benefit / advantage in order to induce a decision in favor of the person providing such benefit / advantage, or a person associated with him;
- 10) illegal use of one's official position contrary to the legitimate interests of the Bank, society, state in order to obtain financial or other benefits/advantages;
- 11) any other actions that violate applicable laws aimed at combating corruption.

14. In accordance with this Policy, the actions specified in article 14 of this Chapter will be qualified as corrupt acts when they are committed:

- 1) directly or indirectly;



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- 2) personally or through the mediation of third parties;
- 3) regardless of the purpose, including the simplification of administrative, bureaucratic and other formalities and other procedures in any form, the provision of competitive and other advantages for the Bank, associated with corrupt practices;

4) in any form, including the receipt/provision of funds, valuables, other property and/or services, other property and/or non-property rights.

15. If the employee of the Bank became aware of the fact of violation of the requirements of the Policy, as well as if the employee of the Bank was offered conditions that lead to violations of the Policy, this employee informs about violations of this Policy in accordance with Chapter 5 of the Policy.

### **Chapter 3. Measures to prevent and combat corruption**

16. Areas of the Bank's activities where corruption risk may arise:

- 1) involvement of the Bank's management ("Tone from above");
- 2) compliance with due diligence in the process of carrying out activities, including when establishing relationships with third parties;
- 3) gifts and entertainment expenses;
- 4) involvement of third parties in matters of combating corruption;
- 5) payments to persons holding a responsible public position, persons authorized to perform state functions, as well as persons equated to them;
- 6) provision of sponsorship and charitable assistance;
- 7) transactions within the framework of the Bank's investment activities for the acquisition and disposal of assets;
- 8) personnel management;
- 9) examination of internal documents.

17. Corruption prevention includes the implementation:


- 1) a comprehensive internal control system (hereinafter referred to as the ICS), development and implementation of adequate and effective measures, internal procedures aimed at minimizing the occurrence of cases of abuse of power and corruption, their consequences for the Bank's activities;
- 2) clear, understandable, effective and enforceable anti-corruption policies and procedures commensurate with the level of risk inherent in the Bank;
- 3) conducting trainings and informing the Bank's employees about:
  - i. the ongoing Anti-Bribery and Corruption Policy;
  - ii. holding accountable those employees who violate the Bank's anti-corruption policies and procedures.

18. Structural units (owners of business processes (sub-processes), owners of risks, including those identified in the course of risk identification) represented by each employee are obliged to detect and prevent a case of corruption, as well as any other misconduct or violations that may constitute or testify to corruption.

19. Structural divisions on an ongoing basis carry out ongoing monitoring of business processes, identify and analyze the risks of corruption.

20. When corruption risks are identified, business process owners (managers) must develop and implement internal controls that will prevent or detect these risks by:

- i. self-introducing changes to the current activities to prevent corruption as part of activities aimed at identifying the risks of corruption in the Bank;
- ii. self-adoption of appropriate measures aimed at eliminating the realized events of corruption;
- iii. making proposals for changing and improving the risk management process in the Bank's activities.

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### **Paragraph 1. Involvement of the Bank's management ("Tone from above")**

21. Bank management, heads of structural divisions of all levels of the Bank
22. declare an uncompromising attitude towards any forms and manifestations of corruption at all levels and must:
- 1) make management decisions that meet the requirements of the Code of Corporate Ethics;
  - 2) actively participate in the formation and promotion of a corporate culture based on the observance of business ethics and the complete rejection of corruption in all forms and manifestations;
  - 3) setting the "tone from above", setting a personal example of such behavior to other employees and adherence to the provisions of the Code of Corporate Ethics.


### **Paragraph 2. Compliance with due diligence in the course of carrying out activities, including when establishing relationships with Third Parties**

23. The Bank develops the necessary procedures, and also takes adequate measures aimed at preventing and preventing corrupt practices, including preventing conflicts of interest, as determined by the Code of Corporate Ethics and other internal regulatory documents of the Bank.
24. Employees of the Bank in the process of carrying out their activities undertake to:
- a) refrain from committing and (or) participating in committing acts of corruption in the interests or on behalf of the Bank;
  - b) refrain from behavior that may be interpreted by others as a willingness to commit or participate in the commission of a corrupt act in the interests or on behalf of the Bank;
  - c) report to the Bank's Hotline:
    - i. about cases of inducing a Bank employee to commit acts of corruption;
    - ii. about information that has become known to the employee of the Bank about cases of corruption committed by other employees of the Bank;
    - iii. about other violations of the principles and rules established in the Policy, as well as about other violations of the law and regulatory documents of the Bank;
    - iv. about gifts in accordance with this Policy.

### **Paragraph 3. Gifts and hospitality**

25. The Bank adheres to the principles of honesty and transparency in relation to business gifts and business hospitality expenses.
26. The Bank considers the exchange of business gifts and entertainment expenses, including business hospitality, to be an integral part of business practice.
- However, such actions must not harm the interests of the Bank and business counterparties, and must not create conflicts of interest.
27. In accordance with this Policy, officials and employees of the Bank are absolutely prohibited from:
- 1) demand or ask for gifts and other forms of hospitality in any circumstances;
  - 2) accept gifts and hospitality from suppliers or potential participants in procurement (tender), auctions held by the Bank during a tender or negotiations to conclude a contract;
  - 3) give cash or non-cash money, securities, precious metals or other luxury items as gifts.
28. Gifts given on behalf of the Bank must be transferred to the address of the organization without a direct personal meeting with an individual, on the basis of documentation.



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An exception is allowed when presenting gifts at official meetings with the participation of the Bank.

29. In accordance with this Policy of the Bank, officials and employees of the Bank are prohibited from presenting, giving or accepting gifts, business hospitality or entertainment expenses from other persons and organizations if:

- 1) there is a purpose of hidden reward for the service provided, action, inaction, connivance, patronage, granting rights, making a certain decision on a transaction, agreement, permission, etc.;
- 2) there are signs of a corruption crime, commercial bribery;
- 3) there are signs of a preliminary agreement or repeated giving of gifts;
- 4) may be perceived as a means of influencing or persuading a person to act in a certain way, or as a reward for performing his/her role or function;
- 5) are provided not on behalf of the Bank, but on behalf of the employee;
- 6) disclosure of information about gifts or entertainment expenses may create a reputational or other risk for the Bank and its employees;
- 7) are not justified in terms of their subject matter, cost and specific situation;
- 8) may influence the recipient for another illegal or unethical purpose;
- 9) may create a conflict of interest;
- 10) contradict the legislation or internal documents of the Bank;
- 11) are in violation of a policy established by a third party organization regarding gifts and hospitality.

30. The total cost of gifts provided on behalf of the Bank to one person, one employee of the organization should not exceed 18 MCI (monthly calculation indices) per year.

31. Gifts to third parties may be made for the purpose of advertising and must contain signs of advertising, tax deductions for the cost of advertising goods are regulated by internal documents of the Accounting Department.

32. Regulation of hospitality expenses and hospitality on behalf of the Bank is carried out in accordance with the requirements of the Bank's Hospitality Rules.


33. In accordance with this Policy of the Bank, employees may accept gifts from third party if these gifts meet the following criteria:

- 1) gifts must be associated with public holidays, memorable dates or anniversaries;
- 2) gifts must be intended for all employees of the Bank, must not cause a conflict of interest or violate the policy and anti-corruption legislation of the Republic of Kazakhstan;
- 3) gifts can be symbolic signs of attention, symbolic souvenirs or branded commemorative items that comply with generally accepted standards of courtesy and hospitality;
- 4) gifts can be received in connection with protocol and other official events, business trips;
- 5) the total value of gifts from one business counterparty or other person should not exceed 2 (two) MCI (monthly calculation indices).

The exception is gifts from the Bank within the limits of the funds provided in the Bank's budget for the corresponding financial year.

34. For the purpose of clarity and transparency in relations between employees when giving gifts, employees of the Bank must comply with the following requirements:

- 1) in the process of giving gifts, it is necessary to strictly comply with the anti-corruption legislation of the Republic of Kazakhstan, as well as internal documents and policies of the Bank related to ethical behavior and conflicts of interest. Gifts that may violate these rules or create conflicts of interest are prohibited;
- 2) gifts must be voluntary and direct decision of each employee;
- 3) giving gifts, including cash, must be carried out within the framework of a professional and respectful relationship between colleagues. Gifts may not be used to influence decisions or obtain improper advantages.

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To avoid potential conflicts of interest, it is recommended that gift-giving events be held and celebrated outside the workplace, preferably outside the Bank;

35. Employees of the Bank may accept hospitality from one business counterparty in the normal course of business relations, for an amount per person not exceeding 12 (twelve) MCI (monthly calculation indices) per year.

36. Entertainment/hospitality of any kind should not be accepted from the same business counterparty more than 2 (twice) times a year.

37. If the gifts received by the Bank (the Bank's employees) do not comply with the requirements of this Policy or other internal documents of the Bank, such gifts shall be returned to the sender/giver.

38. Information about gifts from third party received is recorded in the gift register of the Department of Human Resources and Administration.

The Department of Human Resources and Administration maintains a gift journal, which is drawn up in the form of Appendix No. 1 to this Policy.

Keeping a gift log allows the Bank to keep a systematic and transparent record of gifts received, which helps to comply with policies, internal controls and anti-corruption laws.

39. When receiving / planning to receive a gift, each employee of the Bank, as well as in case of revealing similar actions on the part of another employee of the Bank, must necessarily register in the register of gifts of the Department of Human Resources Management and Administration in the form of Appendix No. 1 to this Policy.

40. If an employee of the Bank reveals an action committed / planned to be committed by him / another employee of the Bank or a third party that led / may lead to a violation of this Policy (as the employee of the Bank believes / has reason to believe), the employee of the Bank is obliged to immediately send a signed scanned copy notifications in the form of Annex No. 2 to this Policy to the Compliance and Internal Control Department by sending by corporate e-mail or via the Hotline (hotline@kz.icbc.com.cn).

41. If there is any doubt as to whether a business gift or event meets the requirements of this Policy, an officer or employee of the Bank should consult with their line manager or C&ICD.

42. Giving gifts on behalf of and at the expense of the Bank, for an amount exceeding the limits provided for in this Policy, can only be transferred upon agreement with the Head of C&ICD or Chief Compliance Officer.

For approval, the structural unit generates a memo addressed to the Head of C&ICD or Chief Compliance Officer, the memo is endorsed by the head of the initiator in agreement with the head of the Compliance and Internal Control Department, the head of the HR and Administration Department.


The original memos are kept in the C&ICD file nomenclature.

43. If the refusal of gifts/hospitality/hospitality by the counterparty and other third parties is inappropriate or offensive, the responsible person must notify C&ICD in writing and agree with the Head of C&ICD or Chief Compliance Officer.

The Head of C&ICD/Chief Compliance Officer decides how to dispose of the gift (donate it to charity, place it in plain sight, for general use, or return it to the sender/donor, and other options).

The decision of the Head of C&ICD/Chief Compliance Officer is recorded in the gift log and indicates the decision (to accept / return the gift) and related details in case of acceptance of the gift.

44. On the facts of violations by employees, officials of the Bank or assistance in illegal activities, they are a serious violation of official duties, for which the Bank has the right to apply disciplinary measures.

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#### **Paragraph 4. Counteracting corruption in the course of interaction with customers, contractors and other persons**

45. The requirements of this Policy are observed when the Bank establishes contractual and other business relations with individuals and legal entities. The Bank expects from customers, counterparties and other persons, as well as their representatives and employees, to comply with the relevant obligations to combat corruption, which may be enshrined in the Bank's agreements with them, or directly follow from the legislation of the Republic of Kazakhstan, the national legislation of the country of registration and (or) implementation of the activities of these persons and the norms of international law.

46. The Bank makes reasonable and available efforts under the circumstances to minimize the risk of violation of the applicable anti-corruption legislation of the Republic of Kazakhstan when establishing business relationships with customers, counterparties and other persons who have been or may be involved in corrupt activities. In this regard, the Bank:

1) analyzes the business reputation of potential customers, counterparties and other persons, their shareholders (participants) and beneficial owners in accordance with the procedure established by the Bank, including for the presence of negative information in publicly available sources;

2) informs potential customers, counterparties or other persons about zero tolerance for corruption and abuse and the principles and requirements of the Bank in the field of combating corruption established in this Policy, including by including the relevant anti-corruption clauses in the agreements (contracts) concluded by the Bank with the specified persons;

3) 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.

47. It is not allowed to conduct business relations with clients/counterparties, as well as persons involved by the Bank for the provision of services under contracts for the provision of services that have been or may be involved in corrupt and/or other illegal activities.

48. The Bank, in accordance with the principle of due diligence, checks the reliability and tolerance for corruption of persons with whom the Bank interacts, as well as the existence of affiliation of counterparties with the Bank and its officials, by:

i.i. verification of clients/counterparties, as well as persons involved by the Bank for the provision of services (performance of work and supply of goods) under contracts for the provision of services (performance of work and supply of goods) before making a decision to start or continue business relations for their reliability, and prevention of conflicts of interest;

ii. identification of third party agents involved in obtaining key assets, verification of licenses from individuals/legal entities providing services to the Bank, etc.

iii. inclusion in agreements (contracts) of conditions conducive to combating fraud and corruption.

49. Verification of counterparties for reliability is carried out by the (economic) security unit at the request of the interested unit based on the following information:

i. negative/positive information about the counterparty contained in the media;

ii. on the participation of the counterparty in litigation that may have a negative impact on the possibility of cooperation with the Bank;


iii. on current enforcement proceedings against the audited counterparty that may have a negative impact on the possibility of cooperation with the Bank;

iv. carrying out other formal checks.

50. Verification of counterparties to prevent conflicts of interest is carried out by the security department based on the following information:

i. information about affiliates of counterparties received from them or from databases of state bodies or other organizations;

ii. information about affiliated persons of the Bank and its officials.

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The security division requests additional information or documents (materials) from the interested division.

### **Paragraph 5. Involvement of third parties in matters of combating corruption**

51. The Bank refrains from engaging third parties and from participating in joint ventures with counterparties that violate the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, this Policy or create a risk of loss of business reputation for the Bank.

52. Before making a decision to start or continue business cooperation with third parties or participation in joint projects, the relevant structural divisions of the Bank, initiating the involvement of third parties, must:

- 1) strictly observe the procedures established by the Bank's internal documents on procurement;
- 2) monitor third parties and contractors for joint projects for any manifestations of corruption by carrying out the following procedures (including, but not limited to):
  - a) checking the availability of their own anti-corruption policies and procedures, readiness to comply with the requirements of this Policy and carry out mutual cooperation in the field of combating corruption;
  - b) verification of goodwill and lack of conflict of interest;
  - c) checking for false entrepreneurship, reliability, availability of tax and other debts, source of funds, as well as the bank, jurisdiction from which the proceeds of crime are sent, by sending requests to the relevant authorized state bodies and organizations (Ministry of Finance of the Republic of Kazakhstan, National Bank of the Republic of Kazakhstan, and others).

53. The Bank reserves the right to terminate transactions with third parties and counterparties on joint projects in case of detection of facts of corruption on their part.

54. Inform third parties and partners in joint projects about the principles and requirements of this Policy.

55. The Bank welcomes the adoption by third parties and counterparties of joint projects of anti-corruption policies and procedures, as well as standards of conduct.

### **Paragraph 6. Payments to persons holding public office, persons authorized to perform state functions, as well as persons equated to them**


56. The Bank does not pay any expenses on its own or through its employees and officials for persons holding a public position, persons authorized to perform public functions, as well as persons equated to them, their close relatives in order to obtain commercial advantages for the Bank, including expenses for transport, accommodation, meals, entertainment, PR campaigns, etc. or receipt by them of other benefits at the expense of the Bank.

57. Officials and employees of the Bank are independently liable for corruption offenses when interacting with government officials in accordance with the anti-corruption legislation of the Republic of Kazakhstan.

### **Paragraph 7. Providing sponsorship and charitable assistance**

58. The Bank may implement a unified charitable policy aimed at creating the image of the Bank as a socially responsible business for non-profit organizations and organizations in the social sphere.

59. The Bank does not finance charitable and sponsorship projects in order to obtain commercial advantages in specific Bank projects.

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60. The Bank does not provide charitable, sponsorship or financial assistance with the direct or indirect purpose of influencing the adoption of decisions by representatives of the state, organizations or other persons that affect the maintenance, expansion or optimization of its activities or if such assistance can be objectively perceived as an attempt to make such an impact.

61. Charitable and sponsorship assistance can be provided only in cases of full transparency and openly, in accordance with the current legislation of the Republic of Kazakhstan and internal documents of the Bank.

#### **Paragraph 8. Transactions within the framework of the Bank's investment activities, acquisition and disposal of assets and other transactions**

62. When planning transactions for the acquisition and disposal of assets, making a preliminary decision on the expediency of these transactions, the Bank conducts a comprehensive audit of the facility's activities, including due diligence in order to identify signs of a corruption risk. The results of this review are considered by the Management Board of the Bank and, if necessary, by the Board of Directors of the Bank when making a final decision on the implementation of the proposed transaction.

63. If, according to the results of the audit, the risk of corruption acquired by the Bank after the completion of the transaction, and the potential economic and reputational damage associated with it for the Bank exceeds the economic benefit from the transaction, the decision to conclude such a transaction is made by the Management Board/Board of Directors of the Bank.

#### **Paragraph 9. Personnel Management**

64. The Bank adheres to the principles of objectivity and honesty when making personnel decisions. In order to eliminate corruption risks when hiring, evaluating, promoting and dismissing personnel, the Bank:

- 1) develops and approves in the prescribed manner transparent procedures for the selection and recruitment of personnel and the relevant qualification requirements for the position;
- 2) carries out verification of candidates for employment before making a decision on the beginning or continuation of labor relations for their reliability and the absence of a conflict of interest;
- 3) evaluates the performance of personnel and pays remuneration based on the performance of its key performance indicators and professional achievements;
- 4) makes a decision on promotion to a higher position based on the business qualities and qualifications of the employee;
- 5) carries out the procedure for terminating labor relations with an employee on the grounds provided for by the legislation of the Republic of Kazakhstan.


65. It is not allowed to employ candidates for vacant positions, as well as persons involved by the Bank for the provision of services under contracts for the provision of services who have been or may be involved in corrupt and / or other illegal activities.

66. Officials and employees of the Bank are obliged to confirm, in the form provided for in Appendix No. 3 to this Policy, their obligation to follow this Policy in good faith.

67. The Human Resources Department ensures that all employees of the Bank are familiarized with this Policy when concluding an employment contract, and also ensures that the employees of the Bank sign an obligation to comply with this Policy in the form of Appendix No. 3 to this Policy.

The completed and signed "Agreement on the adoption of anti-corruption restrictions and confirmation of familiarization with the Anti-Bribery and Corruption Policy of JSC "Commercial



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and Industrial Bank of China in Almaty” from the moment of performance of labor and / or official duties in the Bank is stored in the personal file of officials and employees of the Bank.

### **Paragraph 10. Examination of internal documents**

68. Examination of internal regulatory documents of the Bank, incl. draft internal regulations submitted for approval for the presence of provisions in them that contribute to the creation of causes and conditions for the manifestation of corruption (corruption factors), and the development of recommendations aimed at their elimination.

### **Chapter 4. The procedure for preventing and resolving conflicts of interest**

69. Officials and employees of the Bank are obliged to:

1) take measures to prevent the realization of risks associated with a conflict of interest and their settlement.

2) when performing their official duties, be guided by the interests of the Bank and avoid situations or circumstances in which their personal interests will conflict with the interests of the Bank. In the event of a conflict of interest (or the possibility of its occurrence), bring this information in writing to the attention of the immediate manager or the senior management of the Bank.

70. Prevention or settlement of a conflict of interest may consist in changing the official or official position of a Bank employee who is a party to a conflict of interest, up to his removal from the performance of official duties in the prescribed manner, and (or) in his refusal of the benefit that caused the conflict of interest.

### **Chapter 5. Informing about the commission of actions of a corrupt nature**

71. The Bank places this Policy on a network resource with general access for all employees of the Bank and information through the Bank's Hotline channel (hotline@kz.icbc.com.cn) on the Bank's external website for Policy subjects and other persons.


72. Any information (including anonymous information) about a dubious action that is being prepared or has taken place must be carefully and comprehensively considered: not a single violation should be left unattended by the Bank, it is necessary to conduct an internal investigation according to the information received, as well as bring the perpetrators to justice persons and taking measures to prevent similar dubious actions in the future.

73. If there is any evidence that a corrupt act is taking place in the Bank, committed by an official or employee of the Bank, this should be immediately reported to the Compliance and Internal Control Department, or to your immediate or higher manager.

74. Employees of the Bank in the event of facts of inducing another employee, as well as a third party to commit a corrupt act and / or having information about known facts or suspicions of inducing an employee to commit acts of corruption, are obliged to immediately notify the Compliance and Internal Control Department.

75. If an employee of the Bank has information or suspicions about possible corrupt actions or inaction of other employees, customers, counterparties or other persons interacting with the Bank, this employee notifies the Compliance and Internal Control Department by sending a written notification by corporate e-mail or via Hotline (hotline@kz.icbc.com.cn) with information describing the relevant violations. Further activities are carried out in accordance with the internal document regulating the procedure for consideration of confidential and anonymous messages.



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76. In the event that third parties identify a violation/risk of violation of the requirements of this Policy, the Bank welcomes and encourages third parties to send a message to the Bank's Hotline with information describing the relevant violations in free form.

77. The Bank provides the following information channels:

1) Hotline (hotline@kz.icbc.com.cn) for information about violations, including possible violations of the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Bank;

2) mail messages to the legal address of the Bank to the head of the compliance department marked "personally in hand";

3) an appeal to the Chairman of the Management Board, members of the Management Board of the Bank, Chief Compliance Officer, Republic of Kazakhstan.

78. Members of the Management Board, in case of receiving information from the employees of the Bank about possible corrupt practices, notify the Chairman of the Management Board or a person replacing him, as well as the head of the Compliance and Internal Control Department in order to take appropriate preventive measures in order to counteract corrupt practices.

79. The Bank ensures confidential consideration of all applications (messages) received by the Bank's Hotline, and also guarantees persons who provided information about violations in good faith, protection from negative consequences associated with such an appeal (message).

80. The Bank guarantees the observance of the principle of confidentiality in relation to all employees of the Bank, and also that the declared information will be checked as soon as possible and the employee who provided the information will not be subject to sanctions (dismissed, demoted, deprived of bonuses, etc.), if the employee reported the alleged fact of corrupt practices, including if the facts indicated in the appeal were not confirmed during the audit.

However, if such a message is made with malicious intent, as knowingly false, for example, with the aim of slandering or obtaining any preferences or avoiding responsibility, then measures of influence will be applied to such an employee of the Bank in accordance with the legislation of the Republic of Kazakhstan.

Information provided by employees through the Bank's Hotline (hotline@kz.icbc.com.cn) is confidential information.

81. The Bank's hotline (hotline@kz.icbc.com.cn) provides the Bank's employees with the technical ability to send messages about alleged or actual facts of corruption.


In the case of an anonymous report to the Bank's Hotline (hotline@kz.icbc.com.cn), sufficient information is provided to enable an internal investigation to be carried out properly.

## **Chapter 6. Internal official investigations of corruption offenses**

82. All reports of corruption offenses in the Bank are subject to verification or internal investigation by the (economic) security unit with the participation of the relevant structural units of the Bank.

83. Information about the facts of complicity of employees / officials of the Bank or assistance in illegal activities is subject to immediate transfer to the (economic) security unit. The Security Division immediately informs the Chairman of the Management Board of the Bank or a person replacing him of such facts, by decision of the Chairman of the Management Board of the Bank or a person replacing him, the Security Division conducts an internal investigation.

84. If, based on the results of an internal investigation, the fact of corruption is established, the completion of the investigation is considered to be the adoption of corrective measures, based on the principle of zero tolerance for any manifestations of corruption, up to the

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termination of labor relations in accordance with the legislation of the Republic of Kazakhstan and the transfer of materials by the security unit to law enforcement agencies with the annex documents confirming the validity of the appeal.

85. The conclusions of internal official investigations on all facts of corruption, abuse and / or other violations are brought to the attention of the Compliance and Internal Control Department, the Risk Management Department, the Internal Audit Department, the Management Board and the Board of Directors of the Bank.

## **Chapter 7. Responsibility**

86. Management control and a culture of control (control environment) are formed by the Board of Directors and the Management Board of the Bank on the basis of following ethical principles, standards of professional activity and corporate governance, which, together with their legally established duties and responsibilities, ensure adequate control by the Bank's management bodies.

87. The Management Board of the Bank is responsible for the compliance of the Bank's activities with the requirements of the legislation of the Republic of Kazakhstan, ensuring compliance with the requirements of the legislation of the Republic of Kazakhstan in the field of combating corruption.

88. The Management Board of the Bank exercises general control over the fulfillment by the Bank's employees of the requirements of the Policy.

89. The Management Board of the Bank is responsible for organizing and improving the processes and procedures for internal control against corruption, monitoring the functioning of the ICS in order to combat corruption, creates conditions for the Bank's employees to fulfill their duties in the field of combating and corruption.

90. Prevention and counteraction to corruption acts is expressed in the activities of the Bank's employees within their powers:


- 1) on the formation of intolerance to corruption in any form;
- 2) on the formation of corporate and social responsibility in the field of combating corruption;
- 3) for the prevention of corruption;
- 4) to combat corruption, which consists in identifying, preventing, suppressing, disclosing and investigating corruption;
- 5) to minimize and (or) eliminate the consequences of corruption;
- 6) to bring to justice persons who committed corrupt acts.

91. To effectively identify, monitor, assess and minimize the risks of corruption, the Bank uses the following main approaches:

- 1) ensuring proper control in managing the risks of corruption;
- 2) assessing and processing any incoming information about the facts of corrupt practices or any cases of contacting the Bank's employees in order to induce them to commit corrupt acts;
- 3) establishing rules for handling gifts and other incentives;
- 4) establishment of procedures for evaluation, analysis and selection of clients, counterparties and other persons interacting with the Bank;
- 5) ensuring protective measures for the employees of the Bank in case of notification of a conflict of interest in the Bank and (or) a corrupt act;
- 6) communicating the requirements of this Policy to all employees of the Bank;
- 7) conducting training for the Bank's employees on knowledge and understanding of the main provisions of the Anti-Bribery and Corruption Policy;
- 8) bringing to justice the persons who have committed acts of corruption.

92. As part of the Policy, employees of the Bank are prohibited from:

- 1) to provide, promise to provide or offer a monetary reward, gift, hospitality in the

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expectation or hope of obtaining a commercial advantage or as a reward for a commercial advantage already received;

2) provide, promise to provide or offer a monetary reward, gift or hospitality to government officials, agents or representatives in order to simplify or expedite standard procedures;

3) receipt of monetary compensation from a third party, which, in the opinion of the Bank's employee, expects to receive a commercial advantage for itself;

4) receiving a gift or hospitality from a third party who, in the opinion of an employee of the Bank, expects in return from the Bank to provide her with a commercial advantage;

5) threat or retaliation against another employee of the Bank who refused to commit bribery or who raised a question about it in accordance with the Policy;

6) participation in any activity that may lead to a violation of the Policy.

93. All employees of the Bank must:

1) strictly comply with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, the Policy, as well as the principles of professional ethics and ethical standards of business conduct;

2) comply with the requirements of the Policy;

3) in the performance of their official duties or in the performance of actions on behalf of the Bank in any country of the world, comply with anti-corruption laws, international law in the field of combating corruption, as well as the requirements of the Policy;

4) refrain from taking actions and (or) making decisions that may lead to corrupt practices;

5) in the performance of their official duties, contribute to minimizing the risk of corrupt practices when interacting with clients, contractors and other persons who have been or may be involved in corrupt activities;

6) inform about each potential and (or) identified case of violation of the Policy in the manner prescribed by Chapter 5 of the Policy.

94. Heads of structural subdivisions of the Bank:

1) ensure compliance with the principles and requirements of the Policy by the employees of the headed unit;

2) orient the employees of the department headed to comply with the requirements of the Policy, including by personal example of anti-corruption behavior;

3) are responsible for exercising control over the activities carried out by the employees of the Bank;

4) carry out control and monitoring to prevent and combat corruption.


95. Compliance and Internal Control Department, in accordance with the powers and competence granted, has the right to initiate and participate in internal audits and investigations in the field of combating corruption.

96. Officials and employees of the Bank of all structural divisions of the Bank, regardless of their position, are responsible for compliance with the principles and requirements of this Policy, as well as for the actions and inaction of their subordinates who violate this Policy and anti-corruption restrictions

97. Measures of responsibility for manifestations of corruption in the Bank include: measures of criminal, administrative and disciplinary liability in accordance with the legislation of the Republic of Kazakhstan.

98. Officials and employees of the Bank, to whom appropriate measures of responsibility were applied for committing corruption offenses, are not released from compensation for material damage to the Bank, except by a court decision of the Republic of Kazakhstan that has entered into force.

99. Officials and employees, as well as business counterparties and interested parties, have the right to contact the Compliance and Internal Control Department with questions regarding clarification of the requirements of this Policy and / or ethical issues that have arisen in the

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course of work, as well as on facts of violations of the requirements of this Policy, corruption and other illegal activities.

## **Chapter 8. Final provisions**

100. This Policy comes into force from the date of approval by the Board of Directors of the Bank.

101. The policy must be reviewed by the business owner for relevance, taking into account changes in the activities of the Bank and in the legislation of the Republic of Kazakhstan on an annual basis. Amendments and (or) additions to this Policy or its cancellation (loss of force) are carried out in accordance with the internal regulatory documents of the Bank.

102. C&ICD and LD, according to the internal distribution of legislation monitoring, are responsible for the timely provision of amendments and additions to the legislation of the Republic of Kazakhstan and the regulatory acts of the Regulator to the attention of the interested departments/bodies of the Bank.

103. The business owner of the document is responsible for initiating changes to the Policy in accordance with the updated requirements of the regulatory legal acts of the Regulator and the legislation of the Republic of Kazakhstan.

104. The business owner of the Policy, within 10 (ten) working days from the date of approval and (or) introduction of amendments and additions to it, informs the employees of the involved divisions of the Bank of the requirements and norms of this Policy for the areas of activity assigned to him by means of a presentation (training) with follow-up testing (required IRD categories, if necessary).

105. The Board of the Bank provides, and the Compliance and Internal Control Department exercises control and monitoring of familiarization of the Bank's employees with the requirements of this IRD.

106. Bank employees using the Policy in the course of their activities, as well as their managers, are liable for non-fulfillment or improper fulfillment of the requirements of this Policy, including disclosure (leakage) of information containing commercial, banking, official and other legally protected secrets to third parties in accordance with the legislation of the Republic of Kazakhstan.

107. In the event of a change in the name and / or functionality of any of the divisions specified in this Policy, the rights and obligations of the reorganized division are automatically transferred to its successor.

108. In case of non-compliance of this Policy with the requirements of the legislation of the Republic of Kazakhstan, in view of the updates that have arisen that affect the requirements for the content of this Policy, as well as in the part not regulated by this Policy, the Bank is guided by the current legislation of the Republic of Kazakhstan.


Application №1  
to the Anti-Bribery and Corruption Policy  
Industrial and Commercial Bank of China (Almaty) JSC

**Log of registration of notifications of receipt / planned receipt of gifts  
Industrial and Commercial Bank of China (Almaty) JSC**

№	Date received gift	Date of registration in the journal	Full name, position, signature of the person registering information about the gift	Name, position of the recipient of the gift	Name, information about the donor	Gift Description	Estimated gift value	Justification for receiving the gift	Отметка о соответствии Политике противодействия коррупции		CCO/C&IC D approval	Gift Acceptance Information	Gift Return Information	Full name, position and signature of the person responsible for keeping the journal	Notes
									Yes	No, requires CCO/C&ICD approval					
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
1.															

**Explanation for filling out the form**

1. 1. Column 1 indicates: The date when the gift was received from a colleague, counterparty or third party.
2. 2. In column 4 it is indicated: full name of the employee registering information about the gift in the journal.
3. 3. Column 5 shall indicate: Full name of the employee of the Bank who received the gift. Specify the categories or groups of Bank employees for whom the gift is intended (for example, all employees, a specific division, etc.).
4. 4. Column 6 indicates: Enter the name or name of the organization that sent the gift.
5. 5. Column 7 indicates: Describe the details of the gift, including its nature, value, brand, if applicable.
6. 6. Column 8 indicates: Indicate the preliminary estimated value of the gift.
7. 7. In column 10 it is indicated: The “Yes” mark is indicated if there are no contradictions with the Anti-Bribery and Corruption Policy of the Bank.
8. 8. In column 11 it is indicated: The “No” mark is indicated in case of contradictions with the Anti-Bribery and Corruption Policy of the Bank.
9. 9. Column 12 indicates: Coordination with the Head of Compliance and Internal Control Department or Chief Compliance Officer in accordance with “Paragraph 3. Gifts and hospitality” of the Bank’s Anti-Bribery and Corruption Policy, additional details are indicated (for example, donate to charity, place in public, for general use).
10. 10. Column 13 indicates: Gifts can only be accepted if they comply with the Bank's Anti-Bribery and Corruption Policy, or if there is an agreement with the Head of Compliance and Internal Control Department /CCO.
11. 11. Column 15 indicates: Add any additional information or notes that may be useful for further verification or audit.

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Application №2  
to the Anti-Bribery and Corruption Policy  
Industrial and Commercial Bank of China (Almaty) JSC

## NOTIFICATION of Identified Receipt/Planned Receipt of a Gift

I am, \_\_\_\_\_,  
surname, name and patronymic (if any)

Head of \_\_\_\_\_, hereby give notice of  
 the discovery of [given/received/planned to make/planned to receive gift/hospitality/hospitality],  
 namely:

1. 1.Description of gift/hospitality/hospitality:
2. 2.Approximate cost:
3. 3. Information about the donor:
4. 4.Recipient Information:
5. 5.Date:
6. 6.Place:
7. 7. Justification for making/receiving a gift/entertainment/hospitality:
8. 8.Other details:

☐ I believe/have reason to believe that the said action/gift:

- ☐ 1.has the direct or indirect purpose of exerting a selective influence on the adoption of decisions that affect the preservation, expansion or optimization of the Bank's activities or to obtain any advantage or benefit for the Bank, if without these actions the occurrence of favorable consequences for the Bank seems unrealistic;
- ☐ 2. does not comply with the applicable laws and/or internal documents of the Bank;
- ☐ 3. creates a reputational and/or other risk for the Bank and/or the Bank's Employee in case of disclosure of information about him;
- ☐ 4. is cash or non-cash money, securities, precious metals or other types or equivalents of money and/or luxury goods;
- ☐ 5. is not reasonably justified in terms of subject matter, value and particular case.

\_\_\_\_\_  
 (Signature)

“ \_\_\_\_\_ ” 20 \_\_\_\_ г.



Application №3  
 to the Anti-Bribery and Corruption Policy  
 Industrial and Commercial Bank of China (Almaty) JSC

**Consent to accept anti-corruption restrictions and confirmation of familiarization with the  
 Anti-Bribery and Corruption Policy of Industrial and Commercial Bank of China (Almaty) JSC**

I am, \_\_\_\_\_,  
surname, name and patronymic (if any)

in order to comply with the anti-corruption legislation of the Republic of Kazakhstan, as well as the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC and prevent the inadmissible use of my powers for personal, group and other unofficial interests, I agree with the adoption of the following anti-corruption restrictions:

- 1) 1) not combine activities incompatible with the performance of their official duties.
- 2) 2) not to hold positions in the same unit with close relatives (parents, children, adoptive parents, adopted, full and half brothers and sisters, grandfather, grandmother, grandchildren), spouses and in-laws. If the units are different, the position should not be functionally related to the positions held by the named close relatives.
- 3) 3) not to use officially non-distributed information to obtain property or non-property benefits.
- 4) 4) comply with the prohibition on accepting or giving gifts in connection with the performance of official duties in accordance with the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC and the legislation of the Republic of Kazakhstan.

I am, \_\_\_\_\_,  
surname, name and patronymic (if any)

- 1) confirm that I have studied the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC;
- 2) undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan, the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC;
- 3) notified (a) that if I violate the anti-corruption legislation of the Republic of Kazakhstan, the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC, I may be subject to disciplinary, civil, administrative and criminal liability ;
- 4) undertake to take measures to prevent and prevent any possibility of a conflict of interest and immediately notify the Industrial and Commercial Bank of China (Almaty) JSC of a conflict of interest or the possibility of its occurrence, as soon as it becomes known, in order to resolve the conflict of interest.

This Agreement on the adoption of anti-corruption restrictions and confirmation of familiarization with the Anti-Bribery and Corruption Policy of the Industrial and Commercial Bank of China (Almaty) JSC was completed by me personally.

I agree with the above conditions, which I confirm with my signature.

_____	_____	_____
<small>Position, division</small>	<small>surname, name and patronymic (if any)</small>	<small>(Signature)</small>

“    ” \_\_\_\_\_ 20 \_\_\_\_ r.

*Please fill out this form, sign and send to the HR department.*