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Industrial and Commercial  
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**Whistleblowing Policy**  
**“Industrial and Commercial Bank of China (Almaty)” JSC**

**Almaty , 2023**

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## Chapter 1. General provisions

1. This Whistleblowing Policy “Industrial and Commercial Bank of China (Almaty)” JSC (hereinafter referred to as the “Policy”) defines the main objectives and provisions governing the procedure for filing Claims of Violations with the “Industrial and Commercial Bank of China (Almaty) )” JSC (hereinafter referred to as the Bank ), their consideration, taking measures based on the results of their consideration .

2. This Policy has been developed in accordance with the requirements of Resolution of the Board of the National Bank of the Republic of Kazakhstan dated November 12, 2019 188 “On approval of the Rules for the formation of a risk management and internal control system for second-tier banks” .

3. The policy applies to all employees, regardless of the length of their work in the Bank and third parties .

4. Violations adversely affect the Bank's operations and may have serious consequences. It is important for the Bank to be aware of any (potential or suspected) violations in order to eliminate, mitigate and prevent them .

The channel for reporting violations of the Bank is open to all employees, as well as to third parties who may report violations relating to the Bank or its employees. The Policy provides a clear understanding of the Bank's key principles for whistleblowing, the different reporting channels, the investigation process, and the various roles and responsibilities within that process .

5. The policy has been developed as part of the measures taken by the Bank to improve the efficiency of risk management, adequate counteraction to abuse, timely detection of possible facts of corruption, fraud or illegal receipt, disclosure and / or use of information constituting commercial, banking and other secrets protected by laws, as well as other violations in the activities of the Bank that may threaten the strategic goals, reputation or image of the Bank .

6. Policy is aimed at involving employees in the process of protecting the interests of the Bank and its employees and is an addition to the mechanisms used in the Bank to prevent abuses and violations in the workplace.

7. Each worker must cooperate with an investigation initiated under this Politicians .

8. The purpose of this The policies are:


- creation of a free atmosphere, a culture of trust and integrity in which employees can raise concerns about violations , which encourages employees to express their opinion, ensures that disclosure of information about possible violations is properly investigated, and relevant information is brought to the Bank's senior management in a timely manner , when necessary ;

- increasing the level of corporate governance;

- timely identification of possible violations of legislation and internal documents of the Bank, abuse or cases of unlawful receipt, disclosure and/or use of information constituting commercial, banking and other secrets protected by laws;

- minimizing the risk of loss of reputation, financial, legal and other risks , making decisions for corrective measures to eliminate identified violations ;

- control over the effective compliance with the Bank ’s procedures , through which Bank employees confidentially report violations relating to the activities of the Bank and the civil, tax, banking legislation of the Republic of Kazakhstan, legislation of the Republic of Kazakhstan on state regulation, control and supervision of the financial market and financial organizations, legislation of the Republic of Kazakhstan on currency regulation and exchange control, on payments and payment systems, on pensions, on the securities market, on accounting and financial reporting, on credit bureaus and the formation of credit histories, on collection activities, on mandatory deposit guarantees, on counteraction legalization

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(laundering) of proceeds from crime and the financing of terrorism, about joint stock companies, as well as about abuses .

9. The provisions of the Policy do not apply to:

- 1) events that pose a direct threat to the life, health or property of Bank employees;
- 2) conflict situations related to the terms of employment of the Bank's employees;
- 3) interpersonal conflicts/disagreements between the employees of the Bank;
- 4) knowingly false accusations ;
- 5) other issues caused by personal dissatisfaction of employees and third parties .

When resolving events and situations specified in this paragraph, the Bank is guided by the requirements of the legislation of the Republic of Kazakhstan and other internal documents of the Bank.

10. Submitting knowingly false Applications for the purpose of settling personal accounts is considered a serious violation that may entail the application of penalties in the prescribed manner.

11. The policy is based on five key principles:


1) Privacy Protection . The principle of confidentiality is the cornerstone of the Policy. The recipient of a whistleblowing report and all other persons involved in the whistleblowing process treat information confidentially and with the utmost care. The data is stored digitally and is physically accessible only to employees directly involved in the analysis and investigation process, on a “ need to know ” basis . The identity of the Whistleblower and other details of the report are treated as confidential and protected at all stages of the investigation process. The identity of the whistleblower who filed a whistleblowing report shall not be disclosed without the prior express consent of that person, unless disclosure is required by court order in the context of a subsequent legal proceeding;

2) Prevention of victimization and the principle of non-retaliation. Employee protection is of paramount importance to the Bank. Employees who submit a report in accordance with the “ Good Faith ” Policy are adequately protected from any negative impact, such as retaliation, discrimination, or other types of unfair treatment. Retaliation includes any adverse action taken against the reporting individual, such as, but not limited to, demotion, disciplinary action, termination, pay cut, or transfer to another job or shift ;

3) The principle of non-retaliation does not mean that a Whistleblower who violates internal policies or laws cannot be held accountable. Voluntary reporting may be grounds for mitigating potential liability for the Whistleblower . However, it is important to note that the focus is not on punishment, but rather on whether violations have occurred, their (possible) consequences, and ways to prevent future violations. Appropriate action will be taken against any person under the control of the Bank who (attempts to) harm a reporting employee.

4) Anonymous message . Consistent with the Bank's strong commitment to protecting the identity of those who report in good faith and adhering to the principle of non-retaliation as described above, there is a sound basis for protecting workers who report in accordance with this Policy . Because an anonymous report can seriously interfere with the ability to investigate a complaint, the Bank encourages Whistleblowers to disclose their identity when reporting a concern, or at least provide contact details to facilitate any follow-up. However, anonymous reporting is possible under this Politics, since the Bank prefers to receive anonymous reports rather than not report the problem at all;

5) Good faith message . This Policy protects Whistleblowers reporting in good faith. A communication is considered to be made in good faith if the person had reasonable grounds to believe that the information was accurate at the time of the communication. If the information is later found to be untrue, but the report was made in good faith, the Whistleblower is still protected from retaliation , except for those who willfully and knowingly report incorrect or misleading information. Submitting malicious or false Applications is inconsistent with the

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Bank's core values, and intentional misuse of the Bank's whistleblowing channel may result in disciplinary action;

6) Defense of the accused . The protection of employees is of paramount importance to the Bank. In the event that the Subject is allegedly responsible for violations, its labor rights and the right to privacy must be respected . The subject under investigation will be informed of the reason for the investigation, if necessary under the circumstances. If the investigation finds no evidence to justify taking action against the reported subject, that The subject must be protected from any negative impact. The same protection should apply to individuals who are reported in bad faith.

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

13. Concepts and definitions used in this Policy :

1) anonymous e Appeals - Appeals for which it is impossible to establish authorship, there is no signature, including an electronic digital signature, or the postal address of the Informant ;

2) IOI - internal official investigation;

3) Hotline ([hotline@kz.icbc.com.cn](mailto:hotline@kz.icbc.com.cn)) – a confidential information channel for employees of the Bank , external parties, including customers, counterparties of the Bank , designed to receive information about violations provided for in Chapter 2 of this Policy .

4) C&ICD - Compliance and Internal Control Department ;

5) Appeal - information about violations provided for in Chapter 2 of this Policy, information about improper behavior of the Subject, received by post, telephone, e-mail or in any other form;

6) Commission - Commissions for the consideration of complaints, confidential and anonymous appeals and anti- fraud ;

7) Informant - the employee who filed the Appeal ;

8) Bank's employees – any natural person who has an employment relationship with the Bank , including members of the Bank's Management Board ;

9) The subject is the Bank employee in respect of whom the Appeal was submitted ;

10) with the maintenance of personal accounts - actions (or no actions) aimed at causing material, moral or other harm to the Subject, the main purpose of which is not to protect the rights and legitimate interests of the Bank and its employees and / or the goals defined by this Policy ;

11) 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, customers, business counterparties, agents, intermediaries, contractors, as well as other persons).


## Chapter 2. Scope of application

14. Scope of this Politicians applies to relations related to the Applications of the Bank's employees, third parties who have reasonable grounds and must officially on a confidential basis report suspected , actual or planned violations :

1) potential or actual facts of corruption, fraud ( abuse of official position, abuse of authority by officials , fraud , falsification of data / reporting of the Bank , embezzlement of money and other assets of the Bank ) ;

2) violations during procurement procedures ( abuse in relationships with clients, suppliers, contractors and other persons ) ;

3) violations of the legislation of the Republic of Kazakhstan ( regarding the activities of the Bank and the civil, tax, banking legislation of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan on state regulation, control and supervision of the financial market and financial organizations, the legislation of the Republic of Kazakhstan on currency

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regulation and currency control, on payments and payment systems , on pension provision, on the securities market, on accounting and financial reporting, on credit bureaus and the formation of credit histories, on collection activities, on mandatory deposit guarantees, on countering the legalization (laundering) of proceeds from crime and the financing of terrorism, on joint stock companies ) ;

4) unlawful actions in the field of control of conflicts of interest ;  
5) misuse of insider information ;  
6) unlawful receipt and transfer of confidential information ;  
7) violations that cause or may cause material damage or harm the business reputation of the Bank ;

8) non-compliance with the Code of Corporate Ethics.

15. Appeals containing the attribute and specified in paragraph 14 of this Policy are sent for consideration by the Commission.

### **Chapter 3. Procedure for sending Appeals and their consideration**

16. The Bank considers Applications containing information about the Informant. Appeals recognized as anonymous are not subject to consideration, except in cases established by law, when such an appeal contains information about upcoming or committed criminal offenses or about a threat to state or public security and which is subject to immediate redirection to state bodies in accordance with their competence .

17. Before the completion of the consideration of the Application/IOI, the Informant has the right to supplement/correct the information specified in the Application by sending the information to the Compliance and Internal Control Department.

18. Showing evidence of a violation is desirable but not required, however, reporting persons must have reasonable grounds to suspect that a violation has occurred (or will occur).

The information included in the Application can be an important factor in deciding whether to initiate an IOI , and in order for the Bank to properly evaluate and investigate a report of violation .

19. Bank may refrain from IOI or other follow-up action if the Submission contains unsubstantiated allegations and/or if it is not possible to collect additional information because the Submission was sent anonymously .

20. Any employee of the Bank has the right to receive advice on the implementation of the provisions of this Policy by contacting C&ICD.


21. Provided in Circulation information should be as accurate and complete as possible , it is recommended that you provide as much factual information as possible, including the following:

- the essence of the Appeal to the actions (inaction) of officials / employees of the Bank ;
- general information, history of the event , the cause of the problem in chronological order;
- all facts that give an idea of suspicious events, issues and cases;
- the names and surnames of all affected persons;
- date, time and place of events and other information related to the event ;
- information characterizing the degree of urgency and urgency;
- information about facts , documents, witnesses and evidence to substantiate suspicion.

22. Appeals can be sent through the following channels of information:

Table No.1

<b>Channel name</b>	<b>Form transmission information</b>	<b>Recipient of information</b>
E - mail box Hotline	Annex No. 2 to this	Compliance and Internal

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(hotline@kz.icbc.com.cn )	Policy	Control Department
Postal messages to the legal address of the Bank to the head of the Compliance and Internal Control Department , marked “in person”	Annex No.2 to this Policy	Compliance and Internal Control Department , Chief Compliance Officer
Hot line telephone located on the external Bank website	orally	Compliance and Internal Control Department

23. In the event that consideration is urgent, and where there is every reason to believe that such a violation may have negative consequences for the Bank, subject to the confidentiality of the Whistleblower , the Whistleblower may directly apply to the Bank, to the Chairman of the Board, members of the Board of the Bank, Chief Compliance Controller .

24. Choice designated whistleblowing channels is done with a conflict of interest in mind, as the processing of a message by the designated recipients may lead to a (perceived) conflict of interest .

25. The reporting mechanism and subsequent investigative procedures protect the personal data of both the Whistleblower and the Subject allegedly responsible for the breach, if applicable.

26. Employees are not required to use the reporting channels specified in Clause 22 of this Policy or the reporting form in Appendix 2 to this Policy to report suspected violations, but the use of established reporting channels ensures that the report is sent immediately and without delay for evaluation. violation reports.

27. The Commission is responsible for processing all complaints about violations .

28. The composition of the Commission is formed from among the Bank's managers indicated in Appendix No. 3 to this Policy .

29. The member of the Commission whose activities are affected by or is the subject of the Appeal does not participate in the meeting of the Commission on the Appeal .

30. Commission meetings are held as Applications are received.

31. If contact details are provided, the Commission will contact the Whistleblower and inform him/her whether the report falls within the scope of this Policy and, if so, notify Whistleblower , and the way forward.

32. If it is necessary to obtain additional information, the Informant is notified of the need to provide it.

33. If it is not possible to contact the Informant (anonymous Appeal ), IOI on the received message is not carried out. At the same time, the Bank may verify the facts reflected in the anonymous Appeal.


34. In the event that the Informant wishes to take part in the discussion of the issue set out in his Application , the Informant must mark the request to participate in the Commission as a speaker, and indicate the telephone number by which he can be contacted.

35. All Appeals must be sent by the recipients of information specified in paragraph 22 of this Policy to the Secretary of the Commission in a sealed envelope with the inscription “ Commission for the Review of Customer Complaints , Confidential and Anonymous Appeals and Anti-Fraud ” or by email .

36. If the envelope or electronic message referred to in paragraph 22 Policies to be received by any member of the Board or other person Jar, envelope /message must be handed over immediately to the Secretary of the Commission on the date of its receipt.

The received Appeal is subject to registration by the Secretary of the Commission in the Appeal Registration Log (hereinafter referred to as the Journal) in the form in accordance with Appendix No. 1 to the Policy . The journal is maintained by the Secretary of the Commission in electronic form ( excel ) .



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37. The Secretary of the Commission is responsible for organizing the meeting of the Commission no later than three working days from the date of registration of the Application in the Journal .

38. The meeting of the Commission is held in the form of in-person or absentee voting , in the presence of a quorum - at least 2/3 of the Commission. If the joint presence of the members of the Commission is not possible , they participate in the meeting via videoconference to discuss the issues on the agenda and make decisions on them .

If the total number of members of the Commission is insufficient to achieve a quorum, consideration of the issues is postponed to the next meeting of the Commission .

39. Applications are received , as with the participation of an employee - Informant subject to confidentiality (with the exception of those cases when the Appeal was filed anonymously), and without his participation .

40. The Subject is necessarily invited to the meeting, and other persons who can confirm or refute the arguments set out in the Appeal may also be invited .

41. Members of the Commission have the right to request on a confidential basis from interested structural units the necessary information or documents (materials) related to the content of the Application . For the purpose of an objective and comprehensive consideration of the Appeal , the members of the Commission are obliged to obtain a written explanation from the subjects of the Appeal on the merits of the Appeal , as well as attach documents (materials) received from him, confirming his explanations and / or refuting the content of the Appeal (if any).

42. In order to consider the Appeal , the members of the Commission have the right to access any information regarding the subjects of the Appeal in compliance with the legislation of the Republic of Kazakhstan.

43. If, at the stage of initial inquiries, the members of the Commission discover that the information contained in the Appeal has no basis, or, on this issue, consideration in accordance with this Not required by the policy , then the Case can be rejected at this stage, and the decision is documented.

44. In the event that initial inquiries indicate that further consideration of the Appeal is necessary , then the Appeal must be dealt with fairly and objectively with the discovery of the facts, taking into account the presumption of innocence.

45. Based on the results of studying the results of consideration of the Application and hearing the invited persons, the Commission of the Bank decides:

1) if the facts specified in the Appeal are recognized as confirmed, and if the Appeal concerns the Subject who is a member of the Management Board of the Bank, send the results of the consideration of the Appeal to the Board of Directors of the Bank for taking legal measures against the Subject, which the Board of Directors of the Bank deems appropriate;

2) if the facts specified in the Appeal are recognized as confirmed and if the Appeal concerns an Entity that is not a member of the Management Board:

- apply legal measures against the Subject;
- develop measures to eliminate the occurrence of similar inappropriate behavior in the future;

3) if the facts specified in the Appeal are considered unconfirmed:


- stop consideration of the Appeal ;

the Informant accountable in the event that the fact of filing an Appeal is established as a means of settling personal accounts.

46. When making decisions, the members of the Commission present at the meeting are obliged to express their opinion on the agenda items by voting.

Each member of the Commission has one vote. Decisions of the Commission are taken by a simple majority of votes of the members of the Commission present at the meeting, if there is a quorum. In case of an equal number of votes, the vote of the Chairman of the Commission is



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decisive. Members of the Commission express their opinion on the issue under consideration, expressed in the words “for” or “against” .

47. The Bank has the right to apply disciplinary measures against the employees of the Bank in accordance with the labor legislation of the Republic of Kazakhstan, in cases where the Commission establishes:

- 1) the fact of committing a violation(s) by an employee, initiator Appeals ;
- 2) The appeal contains false and unfounded accusations ;
- 3) the purpose of the Appeal is settling personal accounts .

48. Based on the results of consideration of the Application , the Commission has the right to make a decision both at the first meeting and after a full and comprehensive study of the issue with the involvement of relevant employees or structural divisions of the Bank.

49. The decisions of the Commission are drawn up in protocols containing an analysis of all information available on this fact, conclusions and relevant recommendations, measures to eliminate the occurrence of similar violations in the future. The minutes must be signed by all members of the Commission and kept by the Secretary of the Commission.

Also attached to the protocol is an Appeal , documents related to the content Appeals and documents confirming the conclusions of the protocol.

50. In case the Appeal filed in relation to the Chairman or members of the Management Board of the Bank, the Commission must send such an Application for consideration by the Board of Directors of the Bank, in the manner prescribed by the Regulations on the Board of Directors.

51. Appeals about facts that can lead to direct criminal liability, containing signs of a criminally punishable act of employees, may not be considered by the Commission and, by decision of the Chairman of the Management Board of the Bank, be sent to law enforcement agencies by contacting the Informant himself to authorized state bodies or transferring information to the structural unit of economic security for further consideration and transfer to authorized state bodies.

52. The Commission undertakes to take measures to protect the confidentiality and anonymity of the Informant , ensure the objectivity, comprehensiveness and impartiality of the Complaints being considered , and not violate the rights, freedom and legitimate interests of the Informant and the employees in respect of whom the Complaint is filed .

53. The Secretary of the Commission is responsible for organizing meetings of the Commission, maintaining the Journal, drawing up and storing minutes of the Commission meeting, and subsequent transfer to the Bank’s archives in accordance with archival records management.

54. The results of the review and decisions made are communicated to the Informant .

In the reporting process, the Commission will strike a balance between the whistleblower's legitimate interest in being informed of the progress of the IOI and the need to keep the process and results of the IOI confidential in order to protect the progress of the IOI by the Bank, regulators and /or law enforcement agencies , the rights of the accused Subject , or the confidential nature of any follow-up.


#### **Chapter 4. Internal internal investigation of information about violations**

55. IOI process in accordance with this Policy , is a thorough , fair and timely investigation Reports of violations.

56. To ensure independent, objective and impartial fact-finding, the Commission has exclusive rights to initiate and conduct IOIs in all divisions of the Bank .

57. Conditions for evaluating and weighing information to initiate IOI include:

- assessment of the proper use of this Policy;

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- a first assessment of the veracity of the whistleblowing report (based on the content and documentation or details of the report), its materiality to the Bank and the likelihood that the alleged breach may continue;

- already known or available information about violations ;

- the period specified in the information about violations (there are restrictions on access to data when the violation took place a long time ago);

- whether information about violations can lead to exceptionally complex and/or high exposure risks for the Bank;

- the opportunity to establish contact and/or stay in touch with the informant for follow-up questions;

- the ability to protect the identity of the informant throughout the entire process;

- the whistleblower 's willingness to cooperate without prejudice to the whistleblower.

58. When conducting an IOI , the principles listed in paragraph 11 of this Policy are observed .

If at any stage of the IOI there is a risk of revealing the identity of the person, the Informant , the Commission informs the Informant about this , and leaves the decision on the continuation or termination of the IOI to him , except as required by the law of the Republic of Kazakhstan .

59. If the IOI results in regulatory or court hearings, the employee who filed the Complaint can be expected to appear as a witness. In this case, the Bank will provide appropriate assistance and support, including any necessary legal advice to the employee prior to and during the hearing.

60. In IOI cases of violations and / or alleged violations , the circle of all involved participants in the IOI must be determined , which depends on the nature and consequences of the case under investigation. If necessary , third parties may be involved during the IOI for the purposes of conducting relevant examinations and / or consultations.

61. Members of the Commission in case of detection during the consideration of the Appeal fact ov violations, the security unit is assigned to conduct the IOI .

62. Security unit if necessary :

- define e t on the facts set forth in the Application and falling within their competence , a list of persons, structural divisions of the Bank necessary for the initial investigation ;

- involves in the process independent structural units/internal experts of the Bank and/or external (independent) experts/professional researchers (hereinafter referred to as IOI participants) who are not involved in the violation .

63. If it is suspected that the participants involved in the violation have signs of affiliation with the Bank , the IOI is not entrusted to the security unit, these cases are transferred for investigation by law enforcement and / or other state bodies within their competence.

64. Persons involved in violations and/or persons in relation to whom identified appropriate suspicions should not have access to IOI materials.


65. The final results of the IOI are provided to the members of the Commission .

66. The Security Unit coordinates and implements the IOI according to a plan, which should include data collection, interviews of employees and/or third parties whose information may help determine the circumstances of the violations .

67. Interim reporting and/or feedback on the progress of the IOI whenever possible, provided to members of the Commission .

68. Throughout the IOI process , the security unit ensures that relevant information is securely captured, and that the format for providing information is consistent so that the results of the SR can be used for further action.

69. Based on the results of the IOI , adequate response measures should be taken (involvement in responsibility of the perpetrators, taking measures to prevent similar violations in the future).

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## **Chapter 5. Confidentiality**

70. Regardless of the method of Appeal , the members and the Secretary of the Commission guarantee the confidentiality of the Applications and the complete anonymity of the Informant .

At the same time, the Informant is not entitled to abuse the protection granted to him. Otherwise, liability measures may be applied to him in the prescribed manner.

71. All information and documentation provided to the Commission must be treated with confidentiality and anonymity. The decisions taken by the Commission are brought to the attention of a limited circle of persons affected by the issue set forth in the Appeal .

Information contained in An appeal or concerning the essence of the issue may be disclosed only when such disclosure is required for an objective investigation, either by law or in the interests of the Bank, but taking into account the requirements of the Bank’s internal regulatory document ensuring the safety of confidential information.

## **Chapter 6. Protection and no negative consequences**

72. This Policy ensures the protection of the legitimate rights and interests of:

1) any employee who reasonably and in good faith disclosed information about an alleged violation of the legislation of the Republic of Kazakhstan and / or internal documents of the Bank, about an actual or possible criminal offense;

2) any Whistleblower who reasonably and in good faith on rules of the Appeal , contributed to the filing of the Appeal , provided explanations, took part or otherwise assisted in the conduct of the proceedings .

73. The bank guarantees:

- absence of persecution against the Whistleblower . Whistleblowers are provided with the ability to submit Complaints without fear of unlawful/unjustified dismissal, demotion, suspension from office/work , possible harassment, harassment or disciplinary action , with the exception of the fact that the Complaint is submitted as a means of settling personal scores;

- complete confidentiality of information provided by the Informant at all stages of consideration of the Application , including information identifying the Informant , and information reported by the Informant ;

- taking disciplinary measures against persons who destroyed evidence confirming the information provided by the Informant .


74. Considering that the Applications may entail negative consequences for the employees of the Bank, by bringing any accusations against another employee, the Informant must act solely in the interests of the Bank, and not for his own benefit or from personal motives.

75. The submission of intentionally false Applications is considered as a serious violation that can lead to the application of liability measures in the prescribed manner .

The protection provided to the Whistleblower under these Policies is not a defense against disciplinary or other liability for filing a knowingly false Report.

76. An Applicant who knowingly provided false information may be subject to disciplinary or other measures . responsibility stipulated by the legislation of the Republic of Kazakhstan .

77. The Bank's employees are obliged to bring the Applications to the attention of the Commission in a timely manner. In case of deliberate inaction and / or untimely bringing to the attention of the Commission information about the facts of violations listed in paragraph 14 Policies , the Bank has the right to bring such employees to disciplinary liability in accordance with the labor legislation of the Republic of Kazakhstan.

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78. As part of the management information system Compliance and Internal Control Department annually provides the Board of Directors of the Bank with aggregated data on cases of reporting violations , a report on the effectiveness of compliance with this Politicians . Accountability ensures that the Board of the Bank exercises ongoing oversight of the operation and effectiveness of whistleblowing systems and controls. During the reporting process, the identity of the whistleblower is always protected and anonymized , which means that where whistleblowing reports are used in any reporting, there is nothing that could reveal the identity About the whistleblower , will not be disclosed .

## **Chapter 7. Final provisions**

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

80. 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 .

81. 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 .

82. 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 .

83. 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) .


84. 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 .

85. 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 .

86. 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 .

87. 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 .


88. From the date of approval of this Policy, consider the “Rules for reporting violations concerning the activities at Industrial and Commercial Bank of China (Almaty) JSC, approved by the Management Board from " 29 " July 20 20 (minutes No. 21 ) to be invalid .

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Application No. 1  
to the Whistleblowing Policy  
“Industrial and Commercial Bank of China (Almaty)” JSC

**Log of registration of Complaints about violations in accordance with  
politics reporting violations  
“Industrial and Commercial Bank of China (Almaty)” JSC**

No.	Date of receipt of the appeal	Summary Appeals

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Application No. 2  
to the Whistleblowing Policy  
“Industrial and Commercial Bank of China (Almaty)” JSC

Head Compliance and Internal Control Department  
“Industrial and Commercial Bank of China (Almaty)” JSC

Chief Compliance Controller  
“Industrial and Commercial Bank of China (Almaty)” JSC

## REPORTING VIOLATIONS \_

### What violations would you like to report?

- ☐ potential or actual facts of corruption, fraud;
- ☐ violations during procurement procedures;
- ☐ violations of the law Republic of Kazakhstan ;
- ☐ unlawful actions in the field of control of conflicts of interest;
- ☐ illegal use of insider information;
- ☐ unlawful receipt and transfer of confidential information ;
- ☐ violations that cause or may cause material damage or harm the business reputation of the Bank ;
- ☐ non-compliance with the Code of Corporate Ethics.

### Your personal data:


<b>Surname</b>	
<b>Name</b>	
<b>Surname</b>	
<b>Department / Organization in which he works</b>	
<b>Is feedback required?</b>	Yes /No
<b>Mobile phone</b>	
<b>Email</b>	

### Text of the Appeal:

*the Appeal contain as much factual information as possible, including the following:*

- *the essence of the Appeal against the actions (inaction) of officials/employees of the Bank ;*
- *general information, history of the event , cause of the problem in*
- *chronological order;*
- *all facts that provide insight into suspicious events, issues and cases;*
- *names and surnames of all affected persons , employees , in respect of whom the Appeal is submitted (full name , department ) ;*
- *date, time and place of events and other information related to the event ;*
- *information characterizing the degree of urgency and urgency;*
- *information about facts , documents, witnesses and evidence to substantiate suspicion.*



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By submitting this Application, I agree to the terms of use of “Industrial and Commercial Bank of China (Almaty)” JSC my personal data presented in this Application , including the collection, recording, systematization, accumulation, storage, extraction, use, depersonalization, deletion and destruction of personal data, in order to process this Application, request by the Bank, if necessary, additional and / or clarifying information for consideration of this Appeal .

Consent is provided from the moment of registration of this Application and is valid until the day of its withdrawal. Consent may be withdrawn by submitting to the Bank an Application for its withdrawal.


“ \_\_\_\_\_ ” \_\_\_\_\_ **20**\_\_\_\_\_

**Signature** \_\_\_\_\_

**The bank guarantees:**

- absence of persecution against the Whistleblower . The Whistleblower is provided with the opportunity to submit a Report without fear of possible retaliation, harassment or disciplinary action , except for the fact that the Report is submitted as a means of settling personal accounts;
- complete confidentiality of information provided by the Informant at all stages of consideration of the Application , including information identifying the Informant , and information reported by the Informant ;
- taking disciplinary measures against persons who destroyed evidence confirming the information provided by the Informant .

At the same time, the protection provided to the Whistleblower is not protection from disciplinary measures or other liability for providing knowingly false information.

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Application No.3  
to the Whistleblowing Policy  
“Industrial and Commercial Bank of China (Almaty)” JSC

**Composition of the Commission for the consideration of complaints, confidential and anonymous requests and combating fraud  
“Industrial and Commercial Bank of China (Almaty)” JSC**

<b>N o.</b>	<b>Structure</b>	<b>FULL NAME. and position</b>
1.	Chairman of the Commission and	Member of the Management Board in charge of HR and Administration
2.	Deputy Chairman of the Commission and	Chief Compliance Officer
3.	Committee Member	Chief Risk Officer
4.	Committee Member	Head of Compliance and Internal Control Department
5.	Committee Member	Head of Risk management division
6.	Member of the Committee	Head of Legal department
7.	Member of the Committee	Head of Human Resources and Administration Department
8.	Secretary	Compliance and Internal Control Department