

**Approved by  
resolution of the Management Board  
Agrarian Credit Corporation JSC  
No. 63 dated September 10, 2025**

**Human Rights Policy  
Agrarian Credit Corporation JSC**

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### 1. General Provisions

1. Respect for human rights is fundamental to ensuring the sustainable development of Agrarian Credit Corporation JSC (the Company).

2. The Human Rights Policy of the Agrarian Credit Corporation Joint Stock Company (the Policy) confirms the Company's commitment to international documents ratified by the Republic of Kazakhstan, the Constitution and laws of the Republic of Kazakhstan in the field of human rights, labor protection, employee insurance, and employee rights.

3. The Company undertakes to uphold the principles set out in this Policy.

### 2. Terms and Definitions

4. The following terms and abbreviations are used in this Policy:

1) **Discrimination** means any distinction, exclusion, restriction, or preference based on the specified characteristics that results in the infringement of human rights and freedoms or equal treatment.

2) **Confidentiality** means ensuring the security of personal information of employees and other persons when considering issues related to human rights.

3) **Corporate Culture** means the set of norms, values, rules, and models of behavior accepted in the Company aimed at maintaining respect for human rights and ethics.

4) **Feedback** means the process of receiving, reviewing, and responding to communications, complaints, suggestions, and requests from employees and other stakeholders on human rights issues.

5) **Ombudsman** means a person appointed by the Company's Board of Directors to advise Company employees applying to Ombudsman and to assist in resolving labor disputes, conflicts, and social and labor issues, as well as in ensuring compliance with the principles of business ethics by Company employees;

6) **Human rights** mean the set of fundamental freedoms and rights inherent to every human being regardless of race, gender, age, language, religion, nationality, social origin, and other characteristics, as enshrined in international treaties, the Constitution, and the legislation of the Republic of Kazakhstan.

7) **Employee** means an individual having an employment relationship with the Company on the basis of an employment contract, including all categories of employees;

8) **Stakeholders** mean individuals, groups, or organizations that have a significant influence on the decisions made by the Company or are affected by these decisions (e.g., Company employees, customers, contractors, etc.);

9) **Holding** means Baiterek National Managing Holding joint-stock company

### **3. Respect for human rights and freedoms**

5. The Company respects human rights and freedoms and strives to identify and prevent any adverse human rights impacts in the course of its activities, exercising due diligence and taking preventive measures to avoid violations of human rights and freedoms.

The Company respects the right of every person to life, liberty, and security of person.

6. No one shall be subjected to arbitrary interference with its privacy, family, home or correspondence, nor to attacks upon its honor and reputation.

7. Company recognizes the right of everyone to own property alone as well as in association with others. No one shall be arbitrarily deprived of its property.

8. Company also respects the right of everyone to freedom of thought, conscience, and religion; this right includes freedom to change its religion or belief and freedom, either alone or in community with others and in public or private, to manifest its religion or belief in teaching, practice, worship, and observance.

9. Everyone has the right to freedom of opinion and expression.

10. Company affirms that everyone has the right to participate freely in the cultural life of Company, to enjoy the arts, to participate in scientific progress, and to enjoy its benefits.

11. The Company also confirms its commitment to providing its employees with equal human rights and freedoms and to preventing any form of discrimination or harassment. The Company undertakes to create workplaces in such a way as to exclude any form of discrimination or harassment based on gender, age, physical disability, race, nationality, language, property, social and official status, place of residence, attitude to religion, political beliefs, membership of a clan or class, membership of public associations or any other characteristic protected by the current legislation of the Republic of Kazakhstan. The basis for selection, hiring, training, determining compensation levels, and promotion within the Company is a person's qualifications, performance, necessary skills, and experience.

12. In accordance with internal regulatory documents, the Company's management has the right to provide training and professional development for employees by improving their professional knowledge, skills, abilities, and competencies in order to increase productivity and the quality of work performed.

13. Employees of the Company have the right to join or not join trade unions, the status, rights, and obligations of which are enshrined in the current legislation of the Republic of Kazakhstan.

14. The Company complies with the laws of the Republic of Kazakhstan on the non-use of labor of persons under the age of hiring and employment permitted by the laws of the Republic of Kazakhstan.

### **4. Interaction between the Company and its Employees**

15. The Company creates safe working conditions and ensures compliance with relevant safety regulations, health standards, rules, and internal occupational health and safety requirements. The Company aims to create and maintain a working environment that minimizes the risk of accidents, injuries, and threats to the health of employees. Together with its employees, the Company strives to continuously improve safety conditions in the workplace, including identifying risk factors and eliminating threats to employee safety in the field of occupational health and safety.

16. The Company is committed to maintaining a work environment free from violence, harassment, coercion, and other dangerous or destructive actions related to internal and external threats. Security measures are in place for employees, which are organized with respect for the privacy and dignity of employees.

17. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment of people, or harassment of any kind. Disrespectful or

inappropriate behavior is unacceptable both in the workplace and in any non-work-related circumstances outside the Company. These principles apply to all stakeholders of the Company.

18. As part of improving interaction with employees, the Holding has established an Ombudsman institution. The Ombudsman plays an important role in building trust between the Company and its employees, improving the corporate climate, and reducing the likelihood of conflicts.

## 5. Policy Principles

19. This Policy is an integral part of the Company's corporate processes, which are regulated, among other things, by the Corporate Governance Code of Baiterek National Managing Holding joint-stock company and the Company's Code of Business Ethics, and does not contradict them.

In implementing this Policy, the Company adheres to the following principles:

1) ensuring that internal and external stakeholders are aware of the key principles of human rights compliance by informing them about the Policy and its current versions, as well as conducting appropriate training;

2) complying with the Policy in relation to all employees without exception, as well as recognizing and supporting human rights in relation to colleagues and business partners by all employees of the Company;

3) continuously analyzing changes in the human rights situation in the Company, as well as updating the guidelines to take such changes into account;

4) interacting with all stakeholders to assess and communicate human rights impacts through: mail, email, telephone, internal meetings, and meetings with external stakeholders;

5) ensuring the functioning of a feedback system to obtain an objective assessment and respond to human rights statements and requests from any stakeholder;

6) taking appropriate measures when human rights violations are identified, as well as ensuring the effectiveness of this tool and its continuous improvement.

## 6. Miscellaneous

20. This Company's Policy is open to the general public and is posted on the Company's official website.

21. The Company strives to continuously comply with the provisions of this Policy in its activities.

22. The Company will improve and update this Policy in view of amendments to the legislation of the Republic of Kazakhstan and the emergence of new standards in the field of human rights in international and national practice, guided, inter alia, by the interests of the Sole Shareholder, the Company, and other related parties.