



**FREEDOM
BROKER**

Approved by

the Decision of the Board of Directors of
Freedom Finance Joint Stock Company

(Meeting Minutes No. 03/28

dated March 28, 2025)

Effective

March 28, 2025

HUMAN RIGHTS POLICY

Almaty

2025

TERMS, ABBREVIATIONS AND DEFINITIONS

1. The Human Rights Policy (hereinafter referred to as the Policy) of Freedom Finance Joint Stock Company (hereinafter referred to as the Company) uses terms, abbreviations and definitions established by international treaties and agreements in the field of human rights, the legislation of the Republic of Kazakhstan and internal documents of the Company, as well as those specifically defined in this Policy.
2. The terms, abbreviations and definitions established in the Policy mean the following:
 - 1) ESG (Environmental, Social, Governance) – sustainable development factors taken into account, when carrying out the Company's activities, namely, environmental (including, but not limited to, climate factors), social (including a society as a whole and local communities, employees of the Company and other stakeholders) and governance (factors determined by the corporate governance system in the Company and the requirements imposed on it);
 - 2) discrimination - (a) any distinction, exclusion or preference made on the ground of a race, a colour, a sex, an age, a religion, a political opinion, an ethnic origin or a social identity, that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; (b) any other distinction, exclusion or preference, that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation determined by the relevant member in consultation with representative organizations of entrepreneurs and workers, where such exist, and with other appropriate bodies;¹
 - 3) complaint – a client's demand for restoration or protection of violated rights, freedoms or legitimate interests of him/her or other persons, for elimination of illegal actions or inaction of the Company, its officials, as well as cancellation of their illegal decisions;
 - 4) party involved - a party that has an interest in the Company and its subsidiaries and is able to either influence their business activities or be influenced by them;
 - 5) wages - whatever the name given or the method of calculation, any remuneration or any earnings, calculated in money and fixed by agreement or national laws or regulations, which, by virtue of a written or oral contract of employment, an employer pays to a worker for the work performed or to be performed, or for services rendered or to be rendered;²
 - 6) counterparties - individuals and legal entities that have assumed certain obligations and/or have demands or other claims against the Company/its property under agreements/contracts and other grounds for emergence of civil rights and obligations (e.g. suppliers, partners);
 - 7) UN - United Nations;
 - 8) appeal - a statement or a complaint sent to the Company or its official, in a written (paper and/or electronic) or oral form.

Chapter 1. POLICY OBJECTIVES

3. The Policy was developed based on the provisions of the UN Universal Declaration of Human Rights and the Constitution of the Republic of Kazakhstan, taking into account the best international business practices within the framework of the Freedom Holding Corp. Human Rights Policy.
4. The Policy is a voluntary public document with the following objectives:
 - defining the general approach of the Company to observance of human rights, including measures taken to prevent the human rights violations and, if such, to eliminate consequences of such impacts;

¹ Clause 1 of Article 1 of the ILO Convention on Employment and Occupation Discrimination No. 111 as of 06/25/1958.

² Article 1 of the ILO Convention on Wages Protection No. 95 as of 07/01/1949

- strengthening trust of the various parties involved.

Chapter 2. FIELD OF APPLICATION

5. The Policy is mandatory for all employees, the Company officials and persons acting on behalf of the Company.
6. The provisions of the Policy shall be taken into account, when developing other policies and procedures in the area of employee-the party involved relations, social aspects and personnel management.
7. The Company expects that its counterparties will demonstrate equal commitment to the Policy.

Chapter 3. GENERAL PROVISIONS

8. The Company acknowledges that in Kazakhstan human rights and freedoms are recognized and guaranteed by the provisions of the Constitution of the Republic of Kazakhstan.
9. The Policy was developed within the framework of the current norms of the labor legislation and the legislation of the Republic of Kazakhstan, regarding promotion and protection of human and civil rights and freedoms, the legislation on anti-corruption and protection of personal data, as well as internationally recognized principles and standards in the field of the human rights, including, but not limited to the following:
 - Universal Declaration of Human Rights;
 - International Covenant on Civil and Political Rights as of 12/16/1966;
 - International Covenant on Economic, Social and Cultural Rights as of 12/16/1966;(These documents are referred to as the International Bill of Human Rights).
 - UN Guiding Principles on Business and Human Rights;
 - UN Global Compact;
 - International Labor Organization (ILO) Declaration on Fundamental Principles at Work and the Mechanism for Implementation as of 06/18/1998;
 - ILO Forced or Compulsory Labour Convention No. 29 as of 06/10/1930;
 - ILO Abolition of Forced Labour Convention No. 105 as of 06/05/1957;
 - ILO Minimum Age Convention No. 138 as of 06/06/1973;
 - ILO Wages Protection Convention No. 95 as of 07/01/1949;
 - ILO Employment and Occupation Discrimination Convention No. 111 as of 06/25/1958.
10. The Company protects human rights through the prism of its core corporate values: compliance with the legislation, the code of corporate ethics, ethical standards and generally accepted norms of business ethics; client focus and teamwork, competence and professionalism of employees, their efficiency, honesty and integrity, responsibility and reliability, information openness, mutual assistance, respect for each other, recognition and respect for the rights of all parties involved.
11. The Company has zero tolerance for any violations and abuses of human rights, in the course of its activities. The Company expects the same strict compliance with the current legislation and respect for human rights from the counterparties with whom it interacts.
12. The Policy should be considered in conjunction with the Code of Corporate Ethics, the Sustainability Policy and other policies and procedures of the Company that fully or partially regulate the human rights issues.
13. In order to implement the Policy, the Company is guided by the following internal regulatory documents:

- Code of Corporate Ethics;
- Sustainability Policy;
- Human Resources Management Policy;
- Internal Control Policy for Combating and Preventing Fraud and Corruption;
- Policy for Managing Existing and Potential Conflicts of Interest;
- Communication Policy;
- Instructions on the Procedure for Considering Client Requests and Complaints;
- Instructions on Implementing Quality Control of Client Service.

Chapter 4. HUMAN RIGHTS COMMITMENTS

14. When interacting with the parties involved, the Company respects human rights and takes measures to ensure that the parties involved are familiar with the provisions of this Policy and the Company's Sustainability Policy, which thereby shares the Company's commitment to strict observance of the human rights. The Company's counterparties are also expected to pay special attention to their own human rights standards and procedures, including the working conditions of their employees.

With respect to employees

15. The Company strives to ensure equal opportunities in hiring and employment and does not tolerate any form of discrimination based on a race, a gender, an age, a religion, a nationality, marital status, sexual orientation or social status.
16. The Company is against all forms of child and forced labor.
17. The Company strictly observes inviolability of human dignity and respects the right of each employee to indicate or not indicate their national, party and religious affiliation.
18. The Company strongly condemns any form of discrimination based on origin, social, official and property status, a gender, a race, a nationality, a language, an attitude to a religion, beliefs, a place of residence or any other circumstances, as well as unjustified disciplinary measures and deductions from wages.
19. The Company respects the right of every employee to privacy, strives to protect personal data of employees and officials of the Company, as well as compliance with the requirements of the legislation on data confidentiality. The Company equally protects the right to use one's native language and culture, to freely choose the language of communication, education, training and creativity.
20. The Company provides employees with equal opportunities for development, recognizing freedom of speech, associations and collective bargaining.
21. The Company guarantees employees fair wages, taking into account their qualifications, experience and job responsibilities without any signs of discrimination.
22. Each employee of the Company has the right to rest. The employee is guaranteed the working hours, weekends and holidays, paid annual leave stipulated by law.
23. The Company takes care of health of its employees by implementing a system of compensation for expenses under voluntary medical insurance (partial coverage) and voluntary international insurance against critical illnesses (full coverage).
24. For employees, the Company makes necessary efforts to create safe working conditions, in accordance with the requirements of the legislation in the field of safety and labor protection. The Company carries out mandatory insurance of its employees against accidents at performance of their work (official) duties.

25. The Company takes measures to create optimal conditions for training and enhancing the expertise of employees. Support for the institution of succession from more experienced to less experienced employees is a key element of the implemented personnel management policy.

26. The Company recognizes the right of employees to individual and collective labor disputes, using legislative methods of resolving them.

Since the Company understands that it cannot simultaneously be the object of a labor dispute and unilaterally make decisions on review, the Company has a permanent body for resolving individual labor disputes, created on an equal basis from an equal number of representatives from the employer and the representatives of employees, in the form of a conciliation commission.

This mechanism for protecting employee rights involves pre-trial settlement of individual labor disputes related to reinstatement at work and other labor disputes. The conciliation commission is obliged to consider the dispute within fifteen working days from the date of registration of the application and issue copies of the decision to the parties to the dispute within three working days from the date of its adoption.

In relation to clients and contractors

27. In the course of carrying out its activities, the Company opposes any forms of modern slavery and human trafficking.

28. The Company adheres to the principles of fairness and respect for the rights of clients. When offering products or providing services to clients, employees shall clearly explain the terms, benefits, risks and possible losses and avoid discrimination on any basis.

29. In relations with clients, the Company makes efforts to protect confidential data, in accordance with legal requirements.

30. Observance of human rights in supply chains is a key element in the Company's activities.

In order to comply with uniform standards of client service, the Company develops the client service quality standards (checklists with basic criteria and weights).

31. The Company implements a communication policy through which effective and targeted communication with clients is built through various communication channels: SMS, email, autorecording, TN messages with and without Push, Stories in TN, WhatsApp Bot, Telegram Bot and phone calls.

A regulated, integral and consistent communication system helps strengthen the Company's brand and build trust among clients, reduce likelihood of conflicts and misunderstandings, and effectively interact with the clients.

32. In accordance with the obligations assumed under the UN Global Compact and the current legislation, the Company undertakes to work to suppress and limit any manifestations of corruption, including extortion and bribery. The Company fully supports the anti-corruption culture, expressed in preservation and strengthening of the Company's value system that reflects intolerance to corruption, as well as formation of an active civic position of non-acceptance of the corruption by all parties involved.

The anti-corruption standards in force in the Company include recommendations for prevention of corruption, namely, formation of intolerance to fraudulent and corrupt behavior among the Company's employees; increasing the responsibility of the Company's employees at performance of their official duties; timely detection of fraudulent and corrupt behavior and the prevention of their negative consequences; monitoring and control by the Management, internal audit and compliance control over the activities of the Company and its employees to prevent fraud and corruption; prevention and elimination of factors that create conditions for fraud and corruption. ³

³Control Policy for Combating and Preventing Fraud and Corruption

In order to respond promptly, the Company constantly monitors negative publications in the media and the online publications, social networks, regarding officials and employees of the Company for fraudulent and corrupt practices.

Chapter 5. MECHANISM FOR CONSIDERING APPEALS AND COMPLAINTS

33. The Company recognizes that every employee, client and counterparty have the right to protect their rights and freedoms by all means that do not contradict the law.⁴
34. Along with judicial mechanisms, every employee, client and counterparty have the right to protect their rights through an effective and appropriate extra-judicial mechanism for considering complaints, both at the state and corporate levels.
35. Employees and clients have the right to contact the Human Rights Defender in the Republic of Kazakhstan for protection of their violated rights and freedoms, whose powers are defined by the Constitution of the Republic of Kazakhstan, for the purpose of state guarantees for protection of human and civil rights and freedoms, observance and respect.⁵ The Human Rights Defender in the Republic of Kazakhstan, within the scope of his/her competence, considers complaints of residents and non-residents, submitted personally and (or) through representatives, within fifteen working days from the date of receipt.
36. The Company has developed an internal mechanism for considering appeals and complaints from the Company's clients, through which everyone can report their concerns about human rights violations in the Company or with the Company's counterparties. The Company considers appeals and complaints of clients, received:
 - 1) in writing, on the official Internet resource of the Company, in the TRADERNET trading platform, JivoSite, by e-mail: info@ffin.kz, as well as on paper - the ones submitted in person, sent by postal or courier service;
 - 2) orally by telephone and during a personal visit by the client to the Company.
37. The Company strives to ensure an objective, comprehensive and timely consideration of client requests and complaints, and to inform applicants about the results of review. Depending on the nature of an appeal or a complaint, a response to it may be provided by the Company immediately if it was received orally (by telephone or during a personal visit by the client) and also recorded in the TRADERNET trading platform or via JivoSite.
38. Anonymous appeals (complaints) or the appeals (complaints) that do not state the essence of the issue are not subject to consideration by the Company.
39. Received appeals or complaints are considered within fifteen calendar days, if additional information is required - within thirty calendar days. If additional examination of documents is required, the review period is extended for up to thirty calendar days, about which the applicant is notified within three calendar days from the date of extension of the review period.

Chapter 6. CONFLICT OF INTEREST MANAGEMENT

40. The Company has a conflict of interest management system that includes procedures and mechanisms for prevention, timely detection, control and resolution of conflicts of interest, development of measures to prevent them, determination of rules of conduct for the Company's employees, in the event of a conflict of interest, as well as minimization of the risks of compromising the business decision-making processes in the Company, under the influence of the personal interests of employees and officials to the detriment of the interests of the Company and its clients.

⁴ including officials

⁵ Constitutional Law of the Republic of Kazakhstan, On the Human Rights Defender in the Republic of Kazakhstan

41. In order to manage and resolve conflicts of interest, the officials and employees of the Company adhere to the following principles: 1) priority of the interests of clients and the Company over the personal interests of officials, employees and the third parties associated with them; 2) equal and fair treatment of all clients of the Company, in the process of rendering services; 3) clear delineation of the powers of the governing bodies, the collegial and working bodies, employees in the decision-making process. The parties involved, whose interests are affected or may be affected by a conflict of interest do not make decisions on its resolution; 4) participation of all employees, regardless of their position, in the processes of preventing, identifying and resolving a conflict of interest; 5) mandatory disclosure of information about a real and/or potential conflict of interest by all employees and officials of the Company; 6) individual consideration of each declared case of a conflict of interest and/or corporate conflicts, in order to determine the degree of risk for the Company and resolve each case of a conflict of interest and/or corporate conflicts; 7) ensuring protection of non-public, confidential, insider information and the information obtained during disclosure of information about the conflict of interest.

Chapter 7. MONITORING

42. The Policy is subject to review for its relevance and compliance with the current legislation, international standards and applicable practices, as necessary, but not less than once every three years.
43. Any amendments and additions to the Policy shall be submitted for consideration at a meeting of the Board of Directors. The Company undertakes to regularly assess compliance with the provisions of the Policy.
44. The Company will readily answer any questions from the parties involved and shareholders, regarding observance with the human rights in the Company.
45. All employees of the Company are liable for violation of the provisions of the Policy, in accordance with the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Company.
46. The Company guarantees that employees, the involved parties or their representatives will not be subject to prosecution, in the event of good faith informing the responsible employees of the Company about their suspicions regarding non-compliance with the provisions of this Policy.