

# Human Rights Policy of Freedom Holding Corp.



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# 1

## DOCUMENT PURPOSE

1.1. This Human Rights Policy (hereinafter referred to as the "Policy") of Freedom Holding Corp. (hereinafter referred to as the "Company") and its subsidiaries has been developed in order to formalize the Company's approach to respecting human rights. It affirms the Company's commitment to respecting human rights in accordance with the United Nations Universal Declaration of Human Rights.

1.2. This Policy is intended to describe the Company's approach to ensuring respect for human rights and preventing their violation within Freedom Holding Corp's operations.

1.3. This Policy is a voluntary public document that defines the Company's approach to human rights issues. The Company strives to prevent adverse human rights outcomes and to address the consequences of such impacts if they occur.

# 2

## SCOPE

2.1. This Policy is compulsory for all directors, employees of the Company, subsidiaries, and individuals acting on the Company's behalf.

2.2. Based on this Policy, it is recommended that the subsidiaries of the Company develop and approve similar internal documents in accordance with the established procedure.

2.3. The principles of this Policy should be considered when developing other policies and procedures related to relations between employees and stakeholders, social issues, and personnel management issues.

2.4. The Company also expects that all of its business partners demonstrate equal adherence to the spirit of the Policy, its principles, and objectives.

# 3

## TERMS AND DEFINITIONS

3.1. The following terms and definitions apply in this Policy:

**Board** – The Board of Directors of Freedom Holding Corp.

**Business partners** – Suppliers, contractors, and clients of the Company and its subsidiaries.

**Discrimination** – Any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national origin or social origin, which has the effect of eliminating or impairing equality of opportunity or treatment in employment and occupation (Article 1, paragraph 1, of the International Labor Organization Convention No. 111 concerning Discrimination in Respect of Employment and Occupation (Geneva, 25 June 1958)).

**Stakeholder** – A party that has an interest in the Company or its subsidiaries and can either affect or be affected by their business activity.

**Company** – Freedom Holding Corp.

**A person with disability** – A person with long-term physical, mental, intellectual or sensory impairments which, in interaction with various attitudinal and environmental barriers, hinders their full and effective participation in society on an equal basis with others.

**Social investments** – The Company's investments aimed at creating positive social outcomes.

**Sustainability** – An organizing principle that aims to meet human development goals while also enabling natural systems to provide necessary natural resources and ecosystem services to humans.

**Subsidiary** – An entity controlled by the parent entity directly, or indirectly through one or more intermediaries.

**ESG** – Environmental, Social and Corporate Governance.



# 4

## GENERAL PROVISIONS

4.1. The Company recognizes the importance of respecting human rights proclaimed by the UN, including labor rights, the right to gender equality, the right to a healthy environment, and the rights of special population groups.

4.2. The Company recognizes the principles set forth in the following international standards and documents:

- Universal Declaration of Human Rights;
- United Nations Guiding Principles on Business and Human Rights;
- UN Global Compact;
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- ILO Forced Labor Convention, No. 29;
- Abolition of Forced Labor Convention, No 105;
- ILO Minimum Age Convention, 1973, No 138;
- and International Covenant on Civil and Political Rights.

4.3. The Company declares that it will have zero tolerance for human rights abuse and violations throughout its operations. The Company expects the same strict compliance with the law and respect for human rights from suppliers, contractors, and partners with whom it interacts.

4.4. This Policy should be read in conjunction with the Code of Ethics and Business Conduct, the ESG Policy, and other policies and procedures of the Company related to ESG management.

# 5

## HUMAN RIGHTS OBLIGATIONS

### In relation to employees

5.1. The Company is dedicated to ensuring equal opportunities during hiring and employment and does not allow any form of discrimination based on race, gender, age, religion, nationality, marital status, sexual orientation, or social status.

5.2. The Company opposes all forms of child labor and forced labor.

5.3. The Company endeavors to provide a fair and favorable working environment with dignity and respect for each employee and pays special attention to working hours and workplace health and safety in accordance with all applicable legal requirements.

5.4. The Company endeavors to provide employees with equal opportunities for development, recognizing freedom of expression, association, and collective bargaining.

5.5. The Company endeavors to provide employees with fair wages, taking into account factors such as the region of work, employee experience, and job responsibilities.

5.6. The Company denounces any forms of violence and harassment at the workplace, including unreasonable disciplinary practices, threats of violence, sexual or racial harassment, bullying, verbal abuse, and withholding of wages.

5.7. The Company seeks to create conditions optimal for, and invests in, employee training and development, provided that the trainings are effective and practical in achieving professional goals. The retention and transfer of knowledge in the Company

is a crucial factor of personnel development.

5.8. The Company respects each employee's right to privacy and will comply with all norms and requirements of applicable data privacy legislation.

### In relation to customers and business partners

5.9. The Company will adhere to the principles of fairness and respect for the rights of customers. Employees of the Company and its subsidiaries must clearly explain to customers the conditions, benefits, risks, and possible losses when offering products or services and avoid discrimination on any grounds.

5.10. The Company opposes all forms of modern slavery and the human trafficking in its operations.

5.11. In dealing with customers, the Company will ensure data privacy in accordance with applicable legislation.

5.12. Respecting human rights in supply chains is also an important aspect for Freedom Holding Corp. The Company encourages business partners to follow the commitments in this policy.

### In relation to local communities

5.13. Following the guiding principles of the United Nations Universal Declaration of Human Rights, the Company is committed to respecting the rights of local communities in the regions where the Company operates through a comprehensive dialogue with stakeholders.

5.14. As a signatory of the UN Global Compact, Freedom Holding Corp. undertakes to combat all forms of corruption, including extortion and bribery.



## 6

### RESPONSIBILITY FOR NON-COMPLIANCE

6.1 Due to the differentiated nature of business activity conducted by the subsidiaries of Freedom Holding Corp. and legislation applicable in jurisdictions of their operations, the liability for non-compliance with this Policy is to be determined by rules and procedures of the subsidiaries, as well as local laws.

## 7

### MONITORING

7.1. This Policy will be reviewed for relevance and compliance with applicable standards and practices as necessary, but at least once every three years. Any suggested changes shall be submitted to the Board for review. The Company pledges to regularly assess its compliance with the principles of this Policy.

## 8

### FEEDBACK

8.1. The Company is ready to address any questions of interested parties and stakeholders. Inquiries related to the respecting of human rights of individuals and the content and application of this Policy should be submitted by email: [esg@ffin.kz](mailto:esg@ffin.kz).