



HUMAN RIGHTS POLICY

2026

Target audience:	TBC PAY Employees	
Policy Owner (Responsible for the document):	TBC PAY Risk Management Department	
Units engaged in the implementation:	TBC PAY Risk Management Department TBC PAY Human Capital Management Department	
Reviewed by:	ESG Direction of LTD TBC Group Support	
Approved by:	TBC PAY CEO	
Effective Date:	As defined by TBC Group Human Right Policy	
Replaces:	TBC PAY Human Right Policy version 1	
Date of the approval by TBC PAY:	20 th of August, 2026	
In the event of any discrepancies between the English version of this Procedure and a translated version, the English version shall prevail		
Group Version		Date
Previous Version	3 rd	11 th of December 2024
Current version	4 th	9 th of December 2025
Revision frequency	Annual/Ad Hoc	
Accessibility	Public	
Application and alteration	All Group Companies must adhere to this Policy in its entirety. If a Group Company wishes to adopt and modify its content, it may do so as long as the modifications do not contravene the intent of this Policy. Otherwise, any changes made require approval from TBC Bank Group PLC Board of Directors.	
Implementation	In order to implement this policy, Management adopts the relevant procedures/guidelines that should be established following the rules outlined by Subsidiary Governance Procedure.	
Definitions	Terms written in bold capital letters that have not been defined in this Policy will carry the same meanings as stated in the Glossary approved by TBC Bank Group PLC Board of Directors	

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1. SCOPE AND OBJECTIVES

- 1.1. **TBC PAY** is committed to the highest standards of corporate governance and aims to develop an organizational culture that respects and supports human rights in all its undertakings. **TBC PAY** strictly adheres to international and domestic laws on human rights and freedom and ensures equality for all **Employees**. A special focus is placed on the identification and elimination of any kind of an **Employee** discrimination on any grounds whatsoever. We support the principles contained within the UN Global Compact Principles on Business and Human Rights, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions on Labor Standards.
- 1.2. **TBC PAY** has always been very attentive to respecting human rights and has been integrating it into its day-to-day operations. We believe in the importance of bringing basic human decency to everything we do, and our commitment is embedded in many of our **TBC PAY** policies and internal documents. We support public accountability and transparency and declare our readiness to stay committed to the UN Global Compact and its principles, and continue making them the part of our policies, culture, and day-to-day operations. For three decades, we have been striving to uphold the highest standards of ethics and responsibility, as we believe it to be the best way to succeed in business.
- 1.3. In addition to protecting rights within the **Group**, as a technology company, we see it as our responsibility to connect individuals, businesses, and organizations to create better opportunities for everyone. It includes seeking to address violations of human rights within the spheres of our work and harnessing the power of our network to promote human rights in the scope of our impact.
- 1.4. We aspire to do business in ways that value and respect the human rights of our **Employees**, customers, suppliers, and the communities in which we operate. We make sure not to be complicit in human rights abuses.
- 1.5. **TBC PAY** fully supports all the ten principles of the Global Compact with respect to human rights, labor, environment, and anti-corruption. We support public accountability and transparency and declare our readiness to stay committed to the UN Global Compact and its principles, making them a part of the strategy, culture, and day-to-day operations.
- 1.6. A number of measures have been implemented to ensure that we respect human rights. We will continue to increase and monitor our efforts to meet our standards and to meet the needs and expectations of our customers and stakeholders in the best possible manner. To support this, we report annually on our progress in our annual and sustainability reports.
- 1.7. This **Policy** is a guidance document providing an overview of **TBC PAY's** commitment to respect human rights as it is an integral part of our values and beliefs that are at the core of all we aspire to do and are designed to ensure we conduct ourselves in a manner that is consistent with high ethical standards. The **Policy** outlines how **TBC PAY** applies its principles in its activities and relationships with stakeholders, with respect to its various roles: employer, provider of products and services to its clients, corporate citizen in the communities it serves, partner of local and international organizations.
- 1.8. The **Policy** applies to all our **Employees**, customers, and suppliers. We expect all **Employees** to follow this **Policy** and consistently apply its high standards when doing business.
- 1.9. **TBC PAY** consistently pays attention to how its business activities may affect human rights and will not engage in any activities or relationships when there is clear evidence of severe human rights violations.

- 1.10. This **Policy** serves to operationalize our long-established commitment to respect human rights and provide guidance to our workforce, customers, suppliers, partners, and other external stakeholders on the extent of our responsibilities, commitments, and our expectations from them.
- 1.11. Specific issues related to this policy are regulated by the Human Rights Policy Implementation Guideline.

2. GUIDING PRINCIPLES

- 2.1. **TBC PAY** fully supports and respects the protection of internationally proclaimed human rights and uses ten principles of the Global Compact as a guide. We support public accountability and transparency and declare our readiness to stay committed to the UN Global Compact and its principles, making them a part of the strategy, culture, and day-to-day operations.
- 2.2. The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from: The Universal Declaration of Human Rights; The International Labour Organization's Declaration on Fundamental Principles and Rights at Work; The Rio Declaration on Environment and Development The United Nations Convention Against Corruption.
- 2.3. Ten principles supporting this **Policy** are as follows:
 - **Principle 1:** businesses should support and respect the protection of internationally proclaimed human rights: This Principle sets out the overarching expectation of **TBC PAY** on human rights, namely, to respect and support human rights. Respecting human rights means **TBC PAY** should use due diligence to avoid infringing human rights (“do no harm”) and should address adverse human rights impacts with which they are involved.
 - **Principle 2:** make sure that they are not complicit in human rights abuses: Complicity means being implicated in a human rights abuse that another company, government, individual or other group is causing. The risk of an allegation of complicity is reduced (though not eliminated) if a company has a systematic management approach to human rights, including due diligence processes that cover the entity’s business relationships.
 - **Principle 3:** **TBC PAY** should uphold the freedom of association and the effective recognition of the right to collective bargaining: freedom of association implies respect for the right of all **Employers** and all workers to establish and join groups for the promotion and defence of their occupational interests freely and voluntarily.
 - **Principle 4:** the elimination of all forms of forced and compulsory labour: forced or compulsory labour is any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. By right, labour should be freely given, and **Employees** should be free to leave in accordance with established rules.
 - **Principle 5:** the effective abolition of child labour: child labour is a form of exploitation that is a violation of a human right, and it is recognized and defined by international instruments.
 - **Principle 6:** the elimination of discrimination in respect of employment and occupation: Discrimination in employment and occupation means treating people differently or less favourably because of characteristics that are not related to their merit or the inherent requirements of the job and it can arise in a variety of work-related activities.
 - **Principle 7:** **TBC PAY** should support a precautionary approach to environmental challenges: precaution involves the systematic application of risk assessment, risk management and risk communication. When there is reasonable suspicion of harm, decision-makers need to apply precaution and consider the degree of uncertainty that appears from scientific evaluation.

- **Principle 8:** undertake initiatives to promote greater environmental responsibility: The Rio Declaration ¹says that business has the responsibility to ensure that activities within their own operations do not cause harm to the environment. **TBC PAY** gains its legitimacy through meeting the needs of society, and increasingly society is expressing a clear need for more environmentally sustainable practices.
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies: environmentally sound technologies, as defined in Agenda 21 ²of the Rio Declaration, should protect the environment, are less polluting, use all resources in a more sustainable manner, recycle more of their wastes and products and handle residual wastes in a more acceptable manner than the technologies for which they were substitutes.
- **Principle 10:** **TBC PAY** should work against **Corruption** in all its forms, including extortion and **Bribery**: **Corruption** can take many forms that vary in degree from the minor use of influence to institutionalized **Bribery**.

3. TBC PAY'S LEADERSHIP ROLE

- 3.1. This **Policy** serves to operationalize our long-established commitment to respect human rights and provide guidance to our workforce, customers, suppliers, partners, and other external stakeholders on the extent of our responsibilities, commitments, and our expectations from them.
- 3.2. **TBC PAY** has always been very attentive to respecting human rights and has been integrating it into its day-to-day operations. We believe in the importance of bringing basic human decency to everything we do, and our commitment is embedded in many of our **TBC PAY** policies and internal documents. We support public accountability and transparency and declare our readiness to stay committed to the UN Global Compact and its principles, and continue making them the part of our policies, culture, and day-to-day operations. For three decades, we have been striving to uphold the highest standards of ethics and responsibility, as we believe it to be the best way to succeed in business.
- 3.3. In addition to protecting rights within the **Group**, as a technology company, we see it as our responsibility to connect individuals, businesses, and organizations to create better opportunities for everyone. It includes seeking to address violations of human rights within the spheres of our work and harnessing the power of our network to promote human rights in the scope of our impact.

4. OUR EMPLOYEES

- 4.1. Our **Employees** are our key asset and competitive advantage. We understand how our corporate culture and employment policy impact the well-being of our **Employees**, their families and society as a whole. Our **Employees** are one of our most valuable assets and one of our most important stakeholders. Our responsibility is to create an environment that is capable of attracting and keeping the best people, developing their talents and professional skills, cultivating team spirit, ethical standards and nurturing a corporate culture that supports **Employee** happiness, engagement and, company success.
- 4.2. **TBC PAY** is treating all **Employees** equally and fairly, supporting and coaching them throughout their career. To provide a safe work environment free from any kind of discrimination in which every **Employee** is valued, respected, and treated equally regardless of race, color, sex, language, age, citizenship, origin, place of birth, place of residence, social or property status,

¹https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_CONF.151_26_Vol.I_Declaration.pdf

² <https://sustainabledevelopment.un.org/index.php?page=view&nr=23&type=400>

profession, religion or belief, nationality, ethnicity or social belonging, profession, family/marital status, health, disabilities, sexual orientation, gender identity and expression, political opinion or other beliefs. Relationships at work are regulated by our Code Conduct and of Ethics and a range of policies and procedures.

- 4.3. Our Human Capital department makes decisions in recruitment, appraising and rewarding **Employees** based on our values and ethical principles, ensuring that **Employees** are evaluated according to their merit, fairness, knowledge, skills, and abilities for performing the job.
- 4.4. As **TBC PAY** respects each **Employee's** private life, social conscience and personal beliefs, managers may not require **Employees** to perform personal tasks nor attempt to force **Employees** into supporting any particular public issue, social cause or political candidate.
- 4.5. We strive to embrace the rich diversity of our workforce and benefit from our diverse values and ethical principles. We collaborate and treat our **Employees** respectfully, fairly and with dignity.
- 4.6. We provide a safe workplace and follow laws relating to employment rights.
- 4.7. We are committed to achieving the highest standards of health and safety and fire protection for our **Employees**, customers, and anyone who visits our premises. It includes taking appropriate measures to safeguard and promote **Employee** wellbeing by ensuring a psychologically sound working environment to help prevent work-related illness and providing support and health advice in times of need. We try to help **Employees** find an appropriate work-life balance by providing opportunities, such as flexible and agile working.
- 4.8. We do not tolerate threatening, intimidating or physically harmful behavior by **Employees**, customers, contractors, vendors, suppliers, partners, or anyone else. No type of weapon is permitted on **TBC PAY** property, at work-related functions or while performing business. It does not apply to law enforcement officials and designated security personnel.
- 4.9. Harassment and discrimination of any form, such as sexism, racism, or bullying, has no place in our culture. All forms of harassment and discrimination undermine our ethical culture and can adversely affect the ability of **Employees** to feel included within **TBC PAY**. We do not tolerate harassment or discrimination.
- 4.10. When **Employees** feel unable to use the normal reporting channels, they can talk to the relevant functions in **TBC PAY** or report their concerns through an anonymous hotline in line with the Whistleblowing Policy. We make sure that all **TBC PAY's Employees**, directors, officers, contractors, and staff members are familiar with these policies and procedures. We support **Employees'** rights to exercise freedom of association.
- 4.11. At **TBC PAY**, diversity and inclusion mean intentionally engaging and respecting talents, perspectives, and uniqueness of each **Employee** to drive business success. We are committed to Equal Employment Opportunity (EEO) and Affirmative Action (AA). We provide reasonable accommodation so that prospective and current **Employees** who have disabilities may participate fully in employment opportunities. We are committed to fostering a supportive and respectful work environment to help our **Employees** reach their full potential. We seek to recruit, retain, and develop highly qualified and dedicated individuals for our workforce. Each **Employee** is expected to contribute to a collaborative, positive, and healthy environment.
- 4.12. Therefore, we expect **Employees**:
 - To be supportive of their colleagues;
 - To be generous with their time when someone approaches them looking for help; and
 - To be kind to others

5. OUR CUSTOMERS

- 5.1. We have a customer-centric business model focused on providing the best customer experience in serving the everyday needs of our clients. Our strategy is centered on the core principles of sustainable development, innovation and efficiency and is designed to create value for all our stakeholders.
- 5.2. We are committed to continuously improving our customers' experience by offering tailored products and services in an accessible way coupled with superior customer experience, as well as supporting the development of the business sector to foster job creation in the country.
- 5.3. Excellent customer service is the cornerstone of **TBC PAY's** brand. We treat our customers with respect and professionalism. We understand diverse client needs, add value, and build trust and relationships that endure. We are committed to offering solutions of the highest quality to our clients. We constantly strive to anticipate the rapidly changing needs of our clients and to develop new services to meet those needs. In providing our services, we keep our commitments, deliver what we promise, and act with honesty and integrity whilst pursuing our values. We place clients at the center of our activities. We treat our customers fairly and in a manner that is compliant with all regulatory requirements. By treating customers fairly, we mean that:
- The services that are promoted and sold are designed to meet the needs of identified customer groups and are targeted accordingly;
 - Customers are provided with clear and accurate information in a timely manner;
 - Customers are provided with information about significant risks, restrictions and limits related to specific financial products;
 - Customers are provided with contracts drafted according to Consumer Protection Law requirements;
 - While offering financial products, the terms and conditions of the product are presented in a clear and straightforward manner, refraining from the use of small print or misleading language;
 - We provide clear and accessible information regarding all costs and conditions associated with our services, including commission payments and any exclusion clauses.
 - The provided information is not intended to influence the client to make the wrong decision;
 - All promotion materials are drawn up based on Consumer Protection Law requirements;
 - Customers do not face unreasonable barriers submitting a claim, or making a complaint;
 - We do not invest businesses that have a negative effect on the environment and society (<https://www.tbcbankgroup.com/media/2876/tbc-banks-exclusion-list.pdf>).
- 5.4 Furthermore, **TBC PAY** is committed to conducting its own business in an environmentally and socially responsible manner. In maintaining international best practice in environmental and social risk management, we are committed to ensuring our customers are also fulfilling their environmental and social responsibilities. We recognize that identifying and quantifying environmental and social risks should be part of the normal process of risk assessment. With regard to our customers, we regard compliance with applicable environmental, health and safety and labour regulations and the use of sound environmental, health and safety and labour practices as important factors in demonstrating effective corporate governance. To communicate this philosophy to its stakeholders and shareholders, the **TBC PAY** has adopted Environmental and Climate change policy which describes **TBC PAY's** commitment to sustainable service as an integral component of responsible corporate governance. By identifying and monitoring the environmental and social impacts associated with its operations, suppliers, contractors, and business relationships, and by promoting responsible procurement, resource-efficient operations, and sustainable business practices, **TBC PAY** aims to mitigate the negative environmental and social impacts arising from its activities and value chain. To support this commitment, **TBC PAY** has established Environmental and Social Risk Management (ESRM) procedures to ensure that

appropriate, risk-based environmental and social risk assessment is applied to its operations, procurement activities, suppliers, contractors, outsourced services, and other relevant business relationships. These procedures are integrated into **TBC PAY's** operational and risk management processes and are applied where environmental and social risks may arise. The ESRM procedures include the identification, assessment, mitigation, monitoring, and reporting of environmental and social risks, as well as the implementation of appropriate control measures based on the nature and significance of the identified risks. Where relevant, the procedures consider applicable national legislation, international good practices, and internationally recognized environmental and social standards, including the IFC Performance Standards, EBRD Performance Requirements (PRs), and other relevant sustainability frameworks.

6. SUPPLY CHAIN

- 6.1. **TBC** is one of the largest purchasers in the country. Therefore, our responsible purchasing practices and relationships with suppliers can have a significant impact on the well-being, financial stability, and development of suppliers, as well as on the economy. **TBC's** objective is to responsibly manage the environmental and social risks associated with its operations to minimize impacts on the environment and our stakeholders, and to enhance long term returns to our shareholders.
- 6.2. We understand the scale of our impact, treat our suppliers responsibly, strive to have a permanent dialogue with them, and understand and respond to their needs. We understand that, as a very large buyer, the **TBC PAY** can significantly contribute to start-up company development through its procurement deals. We are always ready to involve suppliers with little experience in our supply chain and, with more effort, contribute to their development.
- 6.3. **TBC PAY** requires that all suppliers respect human rights and comply with all normative acts regulating health, safety, and labor requirements. Compliance is assessed before the business relationship is started and is obligatory at any stage of the relationship. As a legal measure, the obligation is defined in a contract, based on which the supplier is bound to fulfil the requirements. **TBC PAY** conducts regular monitoring of suppliers to ensure compliance with the supplier standard on labour rights and working conditions. If the **TBC PAY** identifies that a supplier might be breaching contract conditions related to human rights, the investigation is conducted. According to the severity of the issue, the action plan for improvement is agreed and/or the contract is terminated. The follow-up on the implementation progress of the action plan is conducted periodically.
- 6.4. In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by applicable legislation, we notify the supplier/partner or the customer so they may adopt corrective measures, and, in cases in which such measures are not taken, we then are entitled to rescind the respective commercial relationship.
- 6.5. **TBC** requires that all suppliers adhere to all applicable environmental regulations including waste management laws, emissions standards, chemical safety regulations etc. The aim is to reduce environmental impacts across supply chain, ensure legal compliance, and drive continuous improvement aligned with **TBC's** ESG commitments and international best practice. **TBC** conducts regular monitoring of suppliers to ensure compliance with the requirements. If the **TBC PAY** determine that a supplier may be violating contract terms related to environmental laws or standards, an investigation is initiated. Depending on the severity of the issue, an improvement action plan is agreed upon and implemented, or the contract is terminated. Progress on the action plan is monitored and reviewed periodically.
- 6.6. **TBC PAY's** supplier selection and payment processes are based on the principles of equality, transparency, and fair competition.

7. ENVIRONMENT

- 7.1. Human beings are part of nature, and our human rights are intertwined with the environment in which we live. Environmental harm interferes with the enjoyment of human rights, and the exercise of human rights helps protect the environment and promote sustainable development. The framework principles on human rights and the environment summarize the key human rights obligations relating to the enjoyment of a safe, clean, healthy, and sustainable environment.
- 7.2. **TBC PAY** is strongly committed to preserving the environment by conducting our business in a responsible and sustainable way, and we take active measures to reduce our ecological footprint of our activities.
- 7.3. **TBC PAY** recognizes that its operations can have direct and indirect impacts on the environment and the society in which it operates. **TBC PAY's** objective is to responsibly manage the environmental and social risks associated with its operations to minimize negative impact on the environment. This approach enables us to reduce our ecological footprint by using resources efficiently and promoting environmentally friendly measures to mitigate climate change.
- 7.4. **TBC PAY's ESG Strategy** reflects its commitment to sustainable growth by integrating Environmental, Social, and Governance principles in its operations. It prioritizes climate change mitigation and adaptation, reducing environmental impact, promoting social responsibility through diversity and human rights, and ensuring strong governance with transparency and ethical practices. Through measurable targets and regular reporting, **TBC PAY** aims to create long-term value for stakeholders and society.
- 7.5. Environmental and Climate Change Policy describes **TBC PAY's** commitment to environmental and social responsibility as an integral component of responsible corporate governance. **TBC PAY** is committed to conducting its own business in environmentally and socially responsible manner. In maintaining the best international practice in environmental, climate and social risk management. We are committed to ensuring our customers are also fulfilling their environmental and social responsibilities. We recognize that identifying and quantifying environmental and social risks should be integral part of risk assessment process. With regard to our customers, we regard compliance with applicable environmental, health and safety and labour regulations and the use of sound environmental, health and safety, and labour practices as important factors in demonstrating effective corporate governance.

8. COMMUNITIES

- 8.1. Engaging with stakeholders and the communities in which the **Group** operates to promote human rights - is another important way of economic empowerment.
- 8.2. **TBC PAY** maintains an annual plan for community development programs that make valuable, effective, and responsible contributions to human rights.
- 8.3. **TBC PAY** actively monitors its community investment initiatives to ensure they deliver meaningful impact. **TBC** regularly tracks the progress of these investments through established evaluation systems, which are designed to measure effectiveness and alignment with our corporate responsibility goals. Additionally, we disclose both the evaluation frameworks and the scope of monitoring activities, reinforcing our commitment to transparency and accountability.
- 8.4. To address the root causes of human rights violations, **TBC PAY** builds partnerships with local and international, state, and private, social, and other human rights advocacy organizations.
- 8.5. We are committed to helping protect human rights and improve opportunities for people living in countries of operations of **Group Companies** by supporting business development.

9. ROLES AND RESPONSIBILITIES

9.1. Roles and Responsibilities at TBC Level

Boards of Directors

The **Board** of **TBC** ensures the oversight and implementation of the **Policy**.

Committees

ESG and Ethics Committee supports the Board in the implementation of the **Policy** at **TBC** level. Other committees, as well, may have their responsibilities regarding this policy, according to their terms of reference.

The committees develop a monitoring system that provides evidence of how much progress has been made in the process of organizational change, identifies spots where reinforced efforts or new priorities are needed, and whether adjustments should be made to the working plan, for example, due to changes in external conditions.

9.2. Roles and Responsibilities at TBC PAY level

Management Board of TBC PAY may decide on the respective governance structure for execution of this Policy. The Management Board must designate a responsible unit/function for the Policy implementation and ensure that respective unit/function develop action plans, if deemed necessary.

Management Board ensures the implementation of the **Policy** in **TBC PAY**. It is the responsibility of the **Management Board** to establish the necessary committee(s) or organizational unit(s) and provide the required resources.

Management Board ensures that involved **Employees** are required to spend part of their working time on human rights mainstreaming in the **TBC PAY's** operations. Where necessary, the job descriptions of **Employees** have to be amended to reflect responsibilities related to human rights activities, defined by the **Policy**.

The **Management Board** develops a monitoring system that provides evidence of how much progress has been made in the process of organizational change, identifies spots where reinforced efforts or new priorities are needed, and whether adjustments should be made to the working plan, for example, due to changes in external conditions.

Human Capital Management Department / Head of HCM – The leading organizational unit/function for internal human rights mainstreaming.

Risk Management Department / ESG specialist – a dedicated organizational unit/person within the **TBC PAY** which/who supports the process of human rights mainstreaming among involved parties, identifies opportunities for improvement and provides knowledge to respective parties.

ESG Specialist, who closely cooperates with the HCM Department on human rights action plans, the monitoring and evaluation of projects, initiatives, and research.

10. HUMAN RIGHTS DUE DILIGENCE PROCESS

10.1. Due diligence process is an ongoing risk management process that a **TBC PAY** needs to follow to identify, prevent, mitigate, and account for how it addresses its adverse human rights impacts. It includes four key steps:

- Assessing actual and potential human rights impacts;
- Integrating and acting on the findings;
- Tracking responses; and
- Communicating about how impacts are addressed.

10.2. Processes Human rights plays a critical role in our broader approach to environmental and social risk management. Before making a financing decision, we assess the potential impacts and work with our clients to apply a clearly defined set of environmentally and socially responsible policies consistent with leading international standards and good practice.

11. INTERNAL AND EXTERNAL COMMUNICATION

11.1. Internal Communication

Responsible departments collect and monitor relevant information related to this **Policy** review this and related policies annually and provides information, advice, and assistance to managers and **Employees** on human rights matters.

TBC PAY will regularly report on the impact of this **Policy** action plans and measures to improve accountability to commitments made and ensure progress and results. It will also collect reliable and measurable data to measure and report on progress achieved in promoting the human rights best practices.

To enhance human rights mainstreaming through internal communication, **TBC PAY** is committed to:

- communicate the relevant tasks and demands to the **Employees** involved
- communicate on the aims and planned activities
- create greater awareness and strengthening commitment
- use the channels and forms of communication customarily used within an organisation (formal channels, such as standing instructions, internal newsletters, team meetings, working sessions, speeches at the events).

TBC PAY will conduct communication activities and disseminate information among **TBC PAY Employees** using all effective channels for internal communication.

11.2. Reporting

Transparency and accountability, as well as measuring and reporting mechanisms are crucial to monitor and track performance and progress.

At **TBC** level, regular reporting to the Audit, Risk Committee, the Corporate Governance and Nomination Committee and the **ESG and Ethics Committee** is ensured.

At the **Group Company**, the internal reporting system is ensured in line with a respective organizational structure. **Group Company** shall deliver respective data in support of the reporting processes at **TBC** level.

At the **TBC PAY** level, the HR and Risk Management Department adopt a communication strategy to ensure transparent integration, awareness raising and communication within and outside the organization. A system for regular internal reporting is ensured for the HR and Risk Committee.

In line with international best practices and regulatory requirements, **TBC PAY** shall incorporate the information about human rights mainstreaming activities, as well as other related data in an annual / sustainability or other relevant reports and/or disclose publicly, e.g., on **TBC PAY's** websites. The information can be disclosed as stand-alone document or can be integrated into existing reporting systems.

11.3. External Communication

Respecting human rights can be a visible part of **TBC PAY's** external identity and self-portrayal that clearly emphasizes the importance of this issue for both the organization's personnel and their respective target group audience. Progress on promoting human rights should be communicated to all stakeholders. The communication could reveal evidence of the effectiveness of the implementation of good practice and could yield more effective activities and measures. Thus, it is necessary to communicate and sustain all results achieved through all possible channels such as meetings, public events, workshops, and dialogues, as well as documents, notice boards and marketing materials.

TBC PAY is committed to:

- address human rights and related topics as important parts of the organization's objectives;
- highlight this commitment on the organization's website or in its publications.

12. REMEDIATION

12.1. Transparency and open communication are an essential part of our daily activities. The feedback and recommendations received from our stakeholders and other interested parties enable us to continuously improve our performance. In doing so, we have developed grievance mechanism to enable interested parties to provide their complaints with regard to environmental and social issues. Records of all communication are stored, including responses according to **TBC PAY's** Procedure for addressing external **E&S** queries and concerns. Interested parties may submit their query on the webpage: <https://tbcpay.ge/contact-us> to the following e-mail address: Operationalrisk@tbcpay.ge

12.2. Everyone is able to submit information anonymously through the following secured web pages:

- Jot form [secured web page](https://www.tbcpay.ge/anonymous-reporting) - <https://www.tbcpay.ge/anonymous-reporting>

12.3. Besides **Anonymous web-based forms** there are following channels for reporting violations/incidents implemented in the TBC PAY:

- E-mail: Complianceincidents@tbcpay.ge;
- Sending anonymous letter;

12.4. When leaving a message on the anonymous website, the IP address is not identified, while information received through the website is automatically sent anonymously to the relevant TBC Pay email group.

- 12.5. Anonymous complaints are received by two **Employees** of the **AML and Compliance Department**, the Head of the **Compliance Department** and the Head of the Compliance and Controlling Unit.
- 12.6. If the issue concerns fraudulent operation by **Employees**, the Operational Risk Department is involved in the process of the inquiry. If the matter concerns employee oppression, bullying or discrimination, the Human Capital Department is involved. In other cases, the AML and **Compliance Department** manages the process.

13. RELATED POLICIES

This **Policy** is supported by the following other policies:

- Code of Conduct and Ethics
- Diversity, Equality and Inclusion Policy
- Environmental and Climate Change Policy



TBC PAY