Approved by the
Supervisory Board of
CJSC Bank «IMON INTERNATIONAL»
Minutes # dated «____» _____2026

POLICY ON ENVIRONMENTAL AND SOCIAL RESPONSIBILITY, CORPORATE GOVERNANCE AND SUSTAINABLE DEVELOPMENT

МАЪЛУМОТ ОИД БА ҲУҶҶАТ

Номгӯи ҳуҷҷат	СИЁСАТ ДАР СОҲАИ МАСЪУЛИЯТИ ЭКОЛОГӢ ВА ИҶТИМОӢ, ИДОРАКУНИИ КОРПОРАТИВӢ ВА РУШДИ УСТУВОР			
Рамзи ҳуҷҷат	А.7.9			
Вазъи ҳуҷҷат	☐ Лоиҳа	☐ Амалкунанда	☐ Мӯҳлатнок	☐ Манъ шуда
Дараҷаи махфият	☐ махфӣ нест	☐ маълумоти дохилӣ	☐ сирри бонкӣ	☐ сирри тиҷоратӣ
Истифодабаранда гон	☐ Раёсат	☐ Аудит	☐ Сардорони зерсохторҳои саридора	☐ Кормандони саридора
	☐ Менеҷменти филиал	☐ Мутахассисони хизматрасонӣ ба мизоҷон ☐ Хазинадор-амалиётгарон	☐ Мутахасси сони дастгирии тиҷорат	☐ Мутахассис оид ба мурофикати СИ ☐ Кормандони маъмурӣ

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1 GENERAL PROVISIONS

1.1 The Policy on Social and Environmental Responsibility, Corporate Governance, and Sustainable Development (hereinafter referred to as the Policy) of CJSC Bank “IMON International” (hereinafter referred to as the Bank) is the Bank's primary document, systematizing its approaches to ESG and sustainable development activities.

1.2 The Policy has been developed taking into account the Bank's Vision, Mission, and Values, the Bank's Development Strategy, and other internal documents regulating various aspects related to ESG and sustainable development.

1.3 This Policy has been developed in accordance with several ESG-related fundamental documents and regulation, such as the Green Economy Development Strategy of the Republic of Tajikistan (2023–2037), international standards, GRI, the Bank's internal regulations, and the UN Sustainable Development Goals (SDGs).

1.4 This Policy is supplemented by regulations, guidelines, and procedures that facilitate the implementation of the objectives of this Policy within the Bank.

1.5 The Bank's established practices and significant experience in corporate governance and social policy, resource conservation and information security, risk management, and internal control systems provide an optimal foundation for the further development of ESG approaches in its operations.

1.6 The Bank is committed to conducting open and transparent business that is understandable to society and beneficial to the country's economic development. The Bank believes that its well-being is inextricably linked to the social well-being of the population in the country where it operates.

1.7 This Policy establishes the goals, principles, areas, and objectives of ESG and sustainable development activities. This Policy establishes uniform principles for ESG activities.

1.8 This Policy is mandatory for all Bank employees in activities involving stakeholder engagement, developing internal regulations, disseminating information, and other communications.

1.9 The primary objective of this Policy is adherence to the principles of environmental, social, and governance (ESG). This Policy has been developed in alignment with the following UN Sustainable Development Goals (SDGs):

- Goal 1. End poverty in all its forms everywhere;
- Goal 5. Achieve gender equality and empower all women and girls;
- Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;

- Goal 13. Take urgent action to combat climate change and its impacts;

1.10 The Bank has implemented core tools, including the Regulation on Environmental Protection and Assessment of Environmental and Social Risks in Client Lending, the Roadmap for ESG Implementation and Development, and a Risk Management Policy that considers environmental and social risks as part of overall institutional risk. Research, such as client service quality surveys, is also regularly conducted to provide insight into service quality and reputational risks.

2 GOALS AND OBJECTIVES OF THE BANK

The Bank is committed to adhering to the following ESG principles.

2.1 Environmental Protection:

- Minimizing the Bank's environmental impact by reducing the use of non-renewable energy and conserving water and paper in its operations;
- Promoting the implementation of green financing solutions that enhance climate resilience and resource efficiency;
- Identifying, monitoring, and managing environmental risks in the Bank's loan portfolio;
- Awareness raising in climate change / green economy.

2.2 Social Responsibility:

- Expanding access to finance for underserved groups, particularly rural populations, women, and youth;
- Ensuring strong customer protection, promoting financial and digital literacy, and maintaining ethical service standards;
- Supporting employee well-being, health, and safety, as well as equal opportunities for all staff members.

2.3 Effective Governance:

- A commitment to integrity, transparency, and accountability in all aspects of the Bank's governance;
- Ensuring independent oversight, effective risk management, and compliance with laws, standards, and the Sustainable Development Goals;
- Integrating ESG principles into decision-making at the Supervisory Board and Management Board levels;
- Ethical conduct of business and anti-corruption standards.

3 SCOPE AND FIELDS OF APPLICATION

This Policy applies to all organizational structures, including Supervisory Board, Management Board, employees, and activities of the Bank, including branches, banking service centers and digital information delivery channels. It covers organizational, functional, geographic, and temporal scopes.

3.1 Organizational Scope.

3.1.1 Employees and Departments:

- All employees, regardless of their position or job responsibilities, are responsible for implementing ESG principles in their work;
- The Business Development Department applies environmental and social assessment tools in the loan application process;
- The Risk Management Department integrates ESG risks into its assessments;
- The Administration Department monitors resource use (e.g., electricity, fuel);
- The Human Resources Department implements a fair hiring and gender equality policy.

3.1.2 Supervisory Board and Committees under the Supervisory Board

The Supervisory Board exercises final oversight of the ESG policy, delegating its responsibilities to the following entities:

- The Asset, Liability, Credit, and Risk Management Committee, which ensures the integration of ESG-related risks into the Bank's overall risk management framework;
- The Audit and Compliance Committee, which monitors ESG indicators, approves published information, and recommends changes to this policy.

3.2 Functional Scope.

3.2.1 Credit Operations and Lending Decisions:

All clients seeking financing for business purposes shall undergo environmental and social risk screening and verification against the Bank’s exclusion list. The level of assessment and due diligence shall be proportionate to the environmental and social risk category assigned to the client. Client categorization shall be based on the potential environmental and social risks associated with the client’s activities and shall be conducted prior to the detailed credit assessment.

3.2.2 Risk Management:

ESG-related risks are considered as risk drivers and are integrated into the corporate risk management system, including credit, operational, and reputational risks.

3.2.3 Human Resources and Administration:

The HR policy supports fair working conditions, equal opportunity, non-discrimination, and health and safety. The Administration Department monitors and manages the use of resources (e.g., electricity, fuel, water) and strives for continuous improvement.

3.2.4 Social Performance and Community Engagement:

Corporate social responsibility initiatives are consistent with ESG principles and the Bank's mission, ensuring transparent reporting of activities and results.

3.2.5 ESG Data, Reporting, and Disclosure:

Departments provide ESG-related data for internal analysis by the Management Board and oversight by the Supervisory Board. External information is published where appropriate and proportionate.

3.3 Geographic Scope.

This policy applies to all operating regions, including rural and mountainous areas where infrastructure limitations may increase risk. Branch managers are responsible for ensuring local compliance and promptly reporting incidents.

3.4 Temporal Scope.

This Policy shall take effect on the date of approval by the Supervisory Board. It shall be reviewed at least every two years, or sooner if required due to changes in legislation, a significant ESG event, or major institutional changes.

4 COMMITMENT TO ESG PRINCIPLES

The Bank recognizes that sustainability and long-term viability depend on managing environmental impacts, ensuring social value, and maintaining governance integrity. This section sets out commitments and minimum required practices for each of these areas:

4.1 Environmental Commitments.

The Bank strives to minimize negative environmental impacts, consider climate risks in its lending, and contribute to the achievement of the green development goals of the Republic of Tajikistan.

Principles:

- Integrating environmental and climate risks into lending and risk management processes;
- Preventing harm and minimizing the negative environmental impacts associated with financing;
- Responsible financing by preventing significant harm to the environment and promoting the implementation of responsible practices;

- Compliance with applicable environmental legislation of the Republic of Tajikistan and striving for continuous improvement.

Minimum required procedures include:

- Mandatory environmental and social screening for credit facilities;
- Application of an exclusion list;
- Escalation of high-risk cases;
- And internal monitoring of operational resource consumption (e.g., electricity and fuel) for management review.

4.2 Social Responsibility.

The Bank's goal is to deliver long-term social impact by providing responsible finance, protecting vulnerable and disadvantaged clients, promoting employee well-being, and supporting community development through targeted corporate social responsibility.

The Bank seeks to avoid financing activities that may result in significant adverse social impacts. As part of its Environmental and Social Risk Management System (ESMS), the Bank screens business clients against social exclusion criteria, including, but not limited to, the use of child labor, forced labor, dangerous or exploitative working conditions, discrimination, and material violations of applicable labor, health and safety, or human rights regulations

Principles:

- Responsible finance based on fair, transparent, and client-focused services;
- Protecting clients' interests, including preventing over-indebtedness and treating them with respect;
- Equal opportunity and non-discrimination for clients and employees;
- Employee well-being, safe working conditions, and professional development;
- Community engagement and corporate social responsibility are consistent with the Bank's mission and ESG objectives.

4.3 Governance Commitments.

The Bank adheres to the highest standards of institutional integrity, transparency, and accountability, ensuring that ESG principles are integrated into its governance and decision-making processes.

Principles:

- Ethical conduct, integrity, and zero tolerance for corruption and fraud;
- Transparent governance with clearly defined roles and responsibilities, as well as effective oversight;

- Ensuring accountability by integrating ESG factors into decision-making and management oversight;
- Risk management that takes into account ESG risks, integrated into the overall risk management framework;
- Disclosure and reporting commitments are aligned with stakeholder expectations and applicable guidelines.

5 ALIGNMENT WITH THE UN SUSTAINABLE DEVELOPMENT GOALS

5.1 As part of its ESG approach, the Bank supports the achievement of the United Nations Sustainable Development Goals (SDGs), which are aimed at ensuring sustainable economic growth, social justice, and environmental protection.

The Bank prioritizes the following sustainable development goals:

Sustainable Development Goals (SDGs)	Focus areas of implementation within the Bank's operations:
SDG 1. No Poverty	• Expanding access to responsible financial services for low-income and underserved population; • Supporting income generation and economic resilience through financing of micro and small businesses
SDG 5. Gender Equality	• Ensuring equal opportunity, non-discrimination, and fair working conditions; • Supporting women through participation in financial projects to develop women's entrepreneurship;
SDG 8. Decent Work and Economic Growth	• Supporting entrepreneurship, MSMEs, and job creation through responsible financing; • Promoting decent work, fair employment practices, and professional development opportunities for employees;
SDGs 13. Climate Action	• Promoting green finance and investments that contribute to environmental sustainability; • Supporting climate resilience and the transition to a low-carbon economy through responsible lending practices

6 MONITORING AND RESPONSIBILITY FOR THE IMPLEMENTATION OF ESG POLICY

6.1 Supervisory Board Oversight.

The Supervisory Board has overall responsibility for overseeing compliance with ESG principles. The Supervisory Board approves this Policy and any material updates thereto, ensures that ESG principles are integrated into strategy and risk appetite, and reviews ESG performance reporting at least semi-annually.

6.2 Supervisory Board Committees.

The Supervisory Board committees support ESG corporate governance principles as follows:

- The Asset, Liability, Credit, and Risk Management Committee (BARCO) ensures that ESG-related risks are integrated into the overall risk management framework;
- The Audit and Compliance Committee (BACCO) ensures that ESG-related controls and data integrity are considered in internal audit planning and reporting.

Management shall report to the Supervisory Board on ESG matters at least quarterly. Such reports shall include key ESG developments, progress against approved ESG objectives, material ESG risks and the status of ESG Policy implementation.

The Supervisory Board may appoint a member responsible for ESG matters to lead the oversight of compliance with ESG principles and ensure appropriate attention to sustainability issues.

6.3 Executive Management Responsibilities.

The Management Board ensures the implementation of this Policy across all departments, allocates resources, and is accountable for ESG performance. Authorized bodies develop procedures for monitoring compliance with environmental and social responsibility principles, handling complaints, collecting data, and reporting.

6.4 ESG Coordination Function.

The ESG Coordinator/ESG Officer coordinates the collection and reporting of ESG data, ensures cross-departmental alignment, and prepares periodic ESG reports for the Management Board and Supervisory Board.

ESG performance is monitored through internal indicators, divisional reports, risk monitoring, audit results, and grievance logs.

Where appropriate, the Bank may publish external data on ESG factors in a summary format.

7 FINAL PROVISIONS

7.1 This Policy shall be approved by the Bank's Supervisory Board.

7.2 The Policy shall be reviewed at least once every two years for compliance with the requirements of current legislation of the Republic of Tajikistan, NBT (National Bank of Tajikistan) regulations, and business processes, as well as in the event of material institutional changes or significant events related to ESG factors.

7.3 In the event of changes to applicable legislation of the Republic of Tajikistan, NBT regulations, or standards governing ESG factors, the corresponding amendments and supplements to this document shall be made no later than one month from the date of their official publication (unless another deadline is specified in the amended regulatory document).

7.4 If necessary, before the Bank's Supervisory Board approves amendments and additions to this Policy, such amendments will be adopted by a separate decision of the Bank's Management Board in accordance with the standard procedure.

List of Terms and Definitions.

ESG factors – factors related to the environment (including ecological factors and factors related to climate change), society (social factors), and corporate governance.

The UN Sustainable Development Goals (SDGs) are set out in the Declaration "Transforming Our World: The 2030 Agenda for Sustainable Development," adopted by the UN General Assembly resolution of September 25, 2015.

The Green Economy Development Strategy in the Republic of Tajikistan for 2023–2037 is a long-term document aimed at transitioning to environmentally sustainable growth, increasing the efficiency of natural resource use, and reducing carbon emissions. The strategy includes five stages of implementation, focusing on industrial modernization, energy efficiency, waste management, and the development of organic agriculture and ecotourism.

International standards for sustainable development, ESG criteria, and corporate responsibility represent a set of tools for managing an organization's impact on the environment, society, and the economy. The main ones are ISO 26000, ISO 14001, ISO 32210, and GRI standards.

GRI (Global Reporting Initiative) standards are the most widely used sustainability reporting standards worldwide. They are universal (applicable to everyone), sectoral (specific to an industry), and thematic (for specific topics such as climate, labor, and the economy).

The Bank monitors international ESG developments and may align its sustainability disclosures with internationally recognized frameworks and reporting standards, including, where relevant, the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

Sustainable Development Goals adopted by the UN

Goal 1. End poverty in all its forms everywhere.

Goal 2. End hunger, achieve food security and improved nutrition, and promote sustainable agriculture.

Goal 3. Ensure healthy lives and promote well-being for all at all ages.

Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Goal 5. Achieve gender equality and empower all women and girls.

Goal 6. Ensure availability and sustainable management of water and sanitation for all.

Goal 7. Ensure access to affordable, reliable, sustainable, and modern energy for all.

Goal 8. Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.

Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation.

Goal 10. Reduce inequality within and among countries.

Goal 11. Make cities and human settlements inclusive, safe, resilient, and sustainable.

Goal 12. Ensure sustainable consumption and production patterns.

Goal 13. Take urgent action to combat climate change and its impacts.

Goal 14. Conserve and sustainably use the oceans, seas, and marine resources for sustainable development.

Goal 15. Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels.

Goal 17. Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development.