

APPROVED
by the minutes No DEC 11-28
of the Board of "Fast Bank" CJSC
dated 23.12.2025
Revision No. 2

ANTI-CORRUPTION POLICY



"FAST BANK" CJSC

Effective from 14 january, 2026

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PURPOSE

The purpose of the "Anti-Corruption Policy" (hereinafter referred to as the "Policy") is to establish the main principles and approaches for the prevention and elimination of corruption in "Fast Bank" CJSC (hereinafter referred to as the "Bank"), aimed at preventing corruption and managing corruption risks to comply with the legislative norms of the Republic of Armenia regarding the counteraction to corruption by the Bank's employees and management (hereinafter referred to as the "Employees").

APPLICATION SCOPE

The norms set forth in the Policy are applied by all employees of the Bank's territorial and structural divisions.

DEFINITIONS AND CONCEPTS

Corruption- corruption crimes defined in Appendix 1 of the Criminal Code of the Republic of Armenia, in particular, abuse of official authority for the purpose of obtaining personal benefit.

Corruption factors- factors, which create conditions for corruption, particularly, the presence of conditions in business processes and/or the Bank's internal legal acts defining an unjustified wide range of powers for the Bank's employees (including the presence of powers or excessive powers unnecessary for the performance of the employee's job duties), or unjustified opportunities to apply exceptions to general rules, as well as place uncertain, difficult to implement and/or burdensome requirements on customers, partners and Bank employees.

Countering corruption- actions aimed at preventing corruption, including identifying the causes of corruption and subsequently eliminating them, identifying and preventing corruption factors, implementing measures to reduce corruption risks, as well as identifying corruption offenses and eliminating their consequences.

Corruption activities- giving or accepting a commercial bribe, soliciting or accepting a bribe, abuse of authority, illegal use of a Bank employee's position to obtain money, valuables, other property, services or any other benefit for himself or other persons, or illegal provision of benefits or rights by the Bank's clients or partners to a Bank employee.

Abuse of Powers- use of their powers by the Bank employees, contrary to the interests of the Bank, for their own benefit or for the benefit of other persons, or for the purpose of obtaining advantages for themselves or other persons, resulting in damage to other persons and/or to the rights, legitimate interests and/or reputation of the Bank.

Commercial bribe: - receiving/providing, requesting, offering to receive/provide, or accepting an offer or promise to receive/provide property, including monetary funds, securities, other payment instruments, rights to property, services or any other advantage, for himself or another person, by a Bank employee, due to the position held by the latter, personally or through an intermediary, using his official powers or the influence resulting from them to perform or refrain from performing an action in favor of the briber or a person indicated by him or her.

Gift - any material or non-material benefit from third parties: suppliers, partners, customers, potential employees and/or any other individual/organization or offered by the Bank's employees and/or management, which may compromise the obligation to make fair, impartial and fundamental decisions.

CHAPTER 1. GENERAL PROVISIONS

1.1. This Policy has been developed based on international conventions against corruption, the current legislation of the Republic of Armenia, Regulation 4 on the "Minimum Conditions for the Implementation of Internal Control in Banks", the Charter of the Bank and other internal legal acts of the Bank.

1.2. This Policy is aimed at ensuring that the Bank's and Bank's employees comply with and strengthen

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international and other legislative norms on combating corruption, introducing high standards of transparent and fair business ethics, and maintaining the Bank's business reputation.

CHAPTER 2. OBJECTIVES AND PRINCIPLES OF ANTI-CORRUPTION

2.1. The objectives of combating corruption are:

- 1) Creating a common understanding of the Bank's Anti-Corruption Policy and the inadmissibility of any manifestations of Corruption among the Bank's shareholders, investors, partners, employees and third parties,
- 2) Mitigating the risks of the Bank and its employees preventing them from the risks of involvement in corrupt activities,
- 3) Establishing the responsibility of the Bank's shareholders, investors, partners, employees and persons cooperating with the Bank for ensuring compliance with the requirements of Anti-Corruption legislation,
- 4) Creation of favorable processes and conditions for combating Corruption in the Bank, which are aimed at informing the relevant competent department in case of suspicions of Corruption activities, as well as at constant analysis and improvement of the Anti-Corruption toolset.

2.2. The principles of combating corruption are:

- 1) Unacceptability of Corruption in any form and manifestation,
- 2) Minimizing the risk of business relationships with clients/partners/investors/other persons who may be involved in Corrupt Practices or who show tolerance towards such practices,
- 3) Promoting the importance of applying Anti-Corruption measures throughout the Bank's operations,
- 4) Constant monitoring of the effectiveness of relevant internal processes implemented to prevent corruption and their continuous improvement,
- 5) Responsibility for corrupt acts.

CHAPTER 3. THE ROLE OF BANK MANAGEMENT IN THE ANTI-CORRUPTION SYSTEM

3.1. The Bank's managers and employees, within the framework of their activities, maintain zero tolerance for Corruption, follow the rules of professional conduct, observing the principles of combating Corruption established by the legislation of the Republic of Armenia, the Policy on Rules of Conduct and Internal Discipline (POL 11) and this Policy, and protecting the reputation of the Bank's shareholders, partners and customers.

3.2. In order to ensure the effective functioning of the Anti-Corruption System, the Bank's management bodies and managers shall:

- 1) ensure that the Anti-Corruption System, including this Policy and objectives, is defined and their adequacy is properly assessed for the purpose of managing corruption risks arising in the course of the Bank's operations;
- 2) ensure the implementation and integration of the requirements of the Anti-Corruption System into the Bank's business processes along with the objectives of this Policy;
- 3) support the effective operation of the Anti-Corruption System and allocate sufficient resources for it,
- 4) take measures to make this Policy available to all stakeholders (investors, employees, partners, customers);
- 5) promote the importance of combating corruption in the Bank, the intolerance of corrupt

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practices and constantly monitor the effectiveness of the Anti-Corruption system,

6) encourage proper reporting of suspected corrupt practices to the relevant competent department of the Bank, including the provision of reporting/whistleblowing channels and the possibility of anonymous reporting ("Hotline")

7) ensure the protection of the interests of employees reporting corruption.

3.3. The effectiveness of the Bank's Anti-Corruption Policy is monitored and periodically assessed by the Bank Board, and the ongoing management of corruption risks is carried out by the Bank's management.

CHAPTER 4. ANTI-CORRUPTION MEASURES

4.1. The Bank ensures the prevention of Corruption by implementing measures stipulated by this Policy and other internal legal acts of the Bank.

4.2. The Bank ensures the existence and application of such rules of conduct and/or standards that provide for the legal, conscientious and proper performance of their work duties by the Bank's employees.

4.3. The Bank ensures the operation of a proper procurement system, which is based on transparency, competition and objective criteria for decision-making and operates effectively from the perspective of preventing corruption.

4.4. The Bank has implemented functions that allow identifying the risks of involvement in Corrupt Practices by Bank employees.

4.5. The Bank has implemented functions that allow identifying the risks of partners and suppliers engaged in Corrupt Practices.

4.6. The Bank has implemented ethical rules regarding the receipt/acceptance of gifts, which are mandatory for all employees and managers.

4.7. The Bank has a structural unit, the Compliance Service, whose functions include exercising control over combating Corruption and which is provided with sufficient resources and is endowed with independence to directly present Corruption-related issues to the Bank Board.

4.8. The Compliance Service performs the following functions within the framework of the Anti-Corruption System:

1) Monitoring the compliance of the Anti-Corruption system with the requirements of this Policy,

2) Submitting a report on the work of the Anti-Corruption System in the Bank, as well as on Corruption incidents, to the Bank management and Board at least annually,

3) Implementation of measures to prevent corruption, including Anti-Corruption due diligence of the processes defined by the Bank's internal legal acts when introducing new business processes and procedures, as well as when changing existing business processes and procedures,

4) Corruption risk management in accordance with the Compliance Risk Management methodology effective at the Bank,

5) Monitoring of applicable international Anti-Corruption legal norms, RA Anti-Corruption legislation and assessment of the impact of their changes on the Anti-Corruption System and informing the Bank management bodies/employees about them,

6) Implementation of measures aimed at forming Anti-Corruption corporate awareness and culture in the Bank, including providing advice and periodic training to employees on corruption risks and their prevention.

4.9. The Bank regularly conducts an annual external audit of financial and economic activities, verifying the complete and accurate reflection of data in accounting reports, in accordance with the requirements of the RA legislation.

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CHAPTER 5. RELATIONSHIPS WITH THIRD PARTIES AND BUSINESS PARTNERS

- 5.1. The Bank has adopted a zero-tolerance Policy towards corruption and bribery.
- 5.2. For its partners, the Bank establishes clear requirements in accordance with the document “Code of Ethics and Environmental Conduct for Organizations Cooperating with “Fast Bank””.
- 5.3. The Bank does not finance political parties’ election campaigns, political events or movements, nor does it provide loans to political candidates for electoral purpose.
- 5.4. The Bank strictly prohibits employees from participating in any way in cases of bribery, regardless of the form or reason, circumstances and purposes, and obliges employees to refrain from such actions.
- 5.5. The Bank’s employees, regardless of their position and status, shall avoid the actual and apparent impudence of receiving gifts in the matters related to the Bank’s activities.
- 5.6. The solicitation/demanding of gifts from the Bank’s customers, suppliers, or any partner having a business relationship with the Bank **is strictly prohibited**:
- 5.7. The Bank employees are not allowed to receive/accept gifts from third parties or give them gifts or provide or receive business hospitality to third parties, except for:
 - 1) promotional materials, symbolic gifts (calendars, pens, notepads, branded accessories, etc.), given in connection with holidays or special events and not intended to influence the Bank, the Bank’s managers and/or any employee in the process of making work-related decisions,
 - 2) Gifts or hospitality usually provided during or during official visits or events, as well as business visits, business trips, if the business hospitality is not provided with the intention of influencing work decisions.
- 5.8. For the purposes of this chapter of the Policy, “hospitality” refers to any gift that is offered, given, or received with the aim of initiating, strengthening, or developing official relationships. It includes, but is not limited to, invitations and offers to attend entertainment, social or sporting events.
- 5.9. Acceptance of cash or non-cash money (including change not taken by customers as a result of transactions, even if the customer himself offers to take it), regardless of the amount, **is strictly prohibited**:
- 5.10. Bank employees must refrain from accepting any gifts offered by clients, partners, or service providers by politely and professionally declining such offers.
- 5.11. Bank employees are prohibited from accepting incentive payments for the purpose of making work-related decisions in favor of any interested party, accelerating processes, or influencing the process in any way (for example, by not disclosing and/or incompletely, distorting, etc.) important circumstances available to them.

CHAPTER 6. ANTI-CORRUPTION SCREENING OF PARTNERS/SUPPLIERS

- 6.1. Within the framework of the Bank’s cooperation with third parties, procedures for conducting business reputation due diligence of partners/suppliers are implemented to identify the risks of the Bank’s direct/indirect involvement in corruption activities.
- 6.2. The Bank does not cooperate with partners/suppliers posing medium to high compliance risks, as well as with persons about whom there is information about their involvement in Corruption and/or allowing Corruption activities.

CHAPTER 7. DUTIES OF BANK EMPLOYEES IN THE ANTI-CORRUPTION SYSTEM

- 7.1. Bank employees are obliged to refrain from Corrupt Practices, in particular, directly or indirectly, personally or through third parties, participating in Corrupt Practices, offering or receiving bribes, abusing their powers, providing money, valuables, other property or services of a property nature

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and/or receiving other property rights for themselves or third parties in order to circumvent administrative or other formal requirements.

7.2. During their activities, the Bank's employees are obliged to comply with the requirements of the RA Anti-Corruption legislation, this Policy and other internal legal acts of the Bank.

7.3. Bank employees are obliged to refrain from actions that may cause a conflict of interest during their activities.

7.4. If Bank employees have suspicions of a Corruption case , they are required to immediately report it to the head of the Bank's Compliance Service, in accordance with the procedures of the "Hotline" channel for Violations and Inconsistencies, using their preferred method. In this case, the head of the Compliance Service is obliged to keep the names of the reporting employees confidential and to conduct an internal investigation regarding the received information within the scope of his/her authority and in accordance with the Bank's internal legal acts, and if necessary, involve the Head of the Physical Security Service.

7.5. The Bank employees who refuse to commit Corrupt Acts at the instigation of other employees or those who provide information about facts/suspects of such acts by other employees are protected from negative consequences (threat of dismissal, threat of disciplinary action, obstruction of work, other threats).

7.6. In order to reinforce the obligations established by this Policy among employees, the Bank familiarizes each employee, upon hiring, with the Bank's Policy on Rules of Conduct and Internal Discipline (POL 11), and when entering into an employment contract with them, it is mandatory to include provisions incorporating the principles and requirements of this Policy, as well as the employee's obligations and responsibilities to comply with Anti-Corruption legislation.

CHAPTER 8. AWARENESS AND TRAINING OF BANK EMPLOYEES

8.1. Training provided by the Compliance Service on the requirements of the Anti-Corruption Policy at least addresses:

- 1) this Policy and the main requirements of the Anti-Corruption System and the obligations of employees regarding their compliance,
- 2) Corruption risks and their consequences for the Bank and its employees,
- 3) Corrupt practices and situations that may contribute to them,
- 4) Corruption factors and their prevention,
- 5) Corruption factors, employee behavior in case of suspicion of corruption, internal reporting procedures,
- 6) Sources of information regarding Anti-Corruption requirements.

8.2. The Compliance Service organizes training on the requirements of the Anti-Corruption Policy for all employees of the Bank once a year. Training of newly hired employees is carried out within three months after the hiring.

8.3. The Compliance Service shall retain the results and materials of training conducted on the requirements of the Bank's Anti-Corruption Policy for at least **five** years.

CHAPTER 9. MONITORING AND IMPROVEMENT OF THE ANTI-CORRUPTION POLICY

9.1. To improve the Bank's Anti-Corruption Policy, the Bank's management bodies review and analyze at least annually the following information:

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1) the results of the previous year's analysis,
 2) changes in internal and external factors affecting the Anti-Corruption system,
 3) the performance results of the Anti-Corruption system, including corrective and preventive measures taken, results of conducted monitoring and evaluations, results of audits, information on reported cases of corruption and actions taken in response, and information on the nature and significance of corruption risks specific to the Bank and the outcomes of measures implemented to mitigate them.

9.2. Based on the analysis of the information specified in clause 9.1 of this Policy, the Bank's management bodies provide recommendations for improving the Anti-Corruption Policy.

CHAPTER 10. RESPONSIBILITY

10.1. Bank employees, regardless of their position, are responsible for failure to comply with the principles and requirements set forth in this Policy.

10.2. Employees who violate the requirements of this Policy are subject to disciplinary liability by the Bank, and in case of detection of corruption violations (for violations of the relevant norms of the RA legislation), they may be subject to criminal and/or other liability at the initiative of the Bank, in accordance with the procedure established by the RA legislation.

CHAPTER 11. TRANSITIONAL PROVISIONS

11.1. This Policy is effective from January 14, 2026.

11.2. The Anti-Corruption Policy, [POL 15#1](#), approved by the decision No. DEC 11-26 of the board of "Fast Bank" CJSC dated 16 December 2024 is recognized as invalid from the date this Policy enters into force.