



TBC BANK GROUP PLC
Human Rights Policy

TARGET AUDIENCE	All employees of all majority owned TBC Bank Group PLC businesses (or business units).	
DEPARTMENT RESPONSIBLE FOR THE DOCUMENT	ESG Coordination Department and HR Department	
CORPORATE UNITS ENGAGED IN THE IMPLEMENTATION	HR Department Marketing Legal Department Compliance Department Procurement E&S Risk Management Group Reporting ESG Coordination Department	
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CONTENTS

1. INTRODUCTION	4
2. SCOPE AND OBJECTIVES OF THE POLICY	5
3. GUIDING PRINCIPLES	6
4. ROLES AND RESPONSIBILITIES	8
4.1 ROLES AND RESPONSIBILITIES AT TBC LEVEL	8
4.2 ROLES AND RESPONSIBILITIES AT TBC BANK LEVEL	8
4.3 ROLES AND RESPONSIBILITIES AT GROUP COMPANY LEVEL	9
5. LEADERSHIP	10
6. OUR EMPLOYEES	11
7. OUR CUSTOMERS	12
8. SUPPLY CHAIN	14
9. ENVIRONMENT	15
10. COMMUNITIES	16
11. HUMAN RIGHTS DUE DILIGENCE PROCESS	16
12. INTERNAL AND EXTERNAL COMMUNICATION	21
12.1 INTERNAL COMMUNICATION	21
12.2 REPORTING	22
12.3 EXTERNAL COMMUNICATION	22
13. REMEDIATION	23
14. RELATED POLICIES	24
15. CHANGES TO THIS POLICY	24
16. DEFINITIONS	25

Introduction

TBC 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 strictly adheres to international and domestic laws on human rights and freedom and ensures equality before the laws of Georgia for all employees. A special focus is placed on the identification and elimination of any kind of 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.

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.

TBC bank 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.

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.

Scope and Objectives of the Policy

This Policy is an internal guidance document providing an overview of TBC'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 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.

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.

TBC 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 violation.

Guiding Principles

TBC bank 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.

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.

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 the company on human rights, namely, to respect and support human rights. Respecting human rights means TBC 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: Businesses 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 7: Businesses 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 Declaration¹ says that business has the responsibility to ensure that activities within their own operations do not cause harm to the environment. Business 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 21² of 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: Businesses 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. Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business.

¹ https://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>

Roles and Responsibilities

4.1 Roles and Responsibilities at TBC Level

Boards of Directors

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

Committees

The Audit Committee, Risk Committee, Corporate Governance and Nomination Committee and ESG and Ethics Committee support the Board of Directors in the implementation of the Policy at TBC level.

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.

4.2. Roles and Responsibilities at TBC Bank Level

Supervisory Board and Committees of the TBC Bank

The Supervisory Board and respective committees of the TBC Bank supervise compliance with this Policy by the Management Board of the TBC Bank.

The Audit Committee, Risk Committee, Corporate Governance and Nomination Committee and ESG and Ethics Committee assist the Supervisory Board in monitoring and evaluating compliance with this Policy by the Management Board of the TBC Bank.

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.

Management Board

The Management Board ensures the implementation of the Policy in the bank. 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 company'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 level committees

The HR and ESG Committees at the executive management level support the Management Board in the implementation of the Policy. The committees are led by a chairperson represented by a senior level management staff and comprise of members - mid-level management staff, who are responsible for implementing the Policy in the areas of their responsibilities.

The HR and ESG 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.

Human Capital Management Department / Head of HCM –

The leading organizational unit / function for internal human rights mainstreaming.

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

Diversity and Gender Specialist – Dedicated specialist of the bank, who closely cooperates with the HCM Department on human rights action plans, the monitoring and evaluation of projects, initiatives, and research

4.3. Roles and Responsibilities at Group Company Level

Management of the Group Company

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

Leadership

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.

TBC 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 group 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.

In addition to protecting rights within the company, 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.

Our Employees

Our employees are our key asset and competitive advantage. 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.

As TBC 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.

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.

We provide a safe workplace and follow laws relating to employment rights.

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.

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 property, at work-related functions or while performing business. It does not apply to law enforcement officials and designated security personnel.

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. We do not tolerate harassment or discrimination

When employees feel unable to use the normal reporting channels, they can talk to the TBC compliance officer or report their concerns through an anonymous hotline in line with the Incident Response Policy. We make sure that all TBC's employees, directors, officers, contractors, and staff members are familiar with these policies and procedures. We support employees' rights to exercise freedom of association.

At TBC, 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.

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

07

Our Customers

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.

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.

Excellent customer service is the cornerstone of TBC's brand. We treat our customers with respect and professionalism. We put our customers' best interests at the forefront of everything we do. 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 products and 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;
- Where customers receive advice, the advice is suitable and takes account of their needs and financial circumstances;
- 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 not misleading;
- 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;
- We do not encourage customers to purchase unnecessary financial products for the purpose of fulfilling our sales plan;
- We are not engaged in miss-selling financial products; and
- Customers do not face unreasonable post-sale barriers imposed by firms when changing product, submitting a claim, or making a complaint;
- We do not finance businesses that have a negative effect on the environment and society (<https://www.tbcbankgroup.com/media/1928/exclusion-list.pdf>).

Supply Chain

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.

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 Bank 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.

TBC 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. If the bank 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.

Environment

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.

TBC 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.

TBC recognizes that its operations can have direct and indirect impacts on the environment and the society in which it operates. TBC'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.

Our Environmental Policy describes TBC's commitment to sustainable finance as an integral component of responsible corporate governance. TBC is committed to conducting its own business in 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 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.

10

Communities

Engaging with stakeholders and the communities in which the company operates to promote human rights - is another important way of economic empowerment. By sharing the knowledge, skills, and resources of the company with local organizations, cooperatives, schools, or projects TBC contributes to the sustainable development of the societies in which it operates.

TBC should develop an annual plan for community development programs that make valuable, effective, and responsible contributions to human rights.

To address the root causes of human rights violations, TBC builds partnerships with local and international, state, and private, social, and other human rights advocacy organizations.

We are committed to helping protect human rights and improve opportunities for people living in Georgia by supporting business development.

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.

Employees:

TBC is one of the largest employers in the country. 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.

TBC 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, 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. We have in place Diversity, Equality, and Inclusion Policy, which sets targets and establishes a methodology to advance diversity, equality, and inclusion, integrating its approach into the operations of the company and focusing on diverse areas including gender, multicultural, multigenerational and disability backgrounds. Relationships at work are regulated by our Code of Ethics, Code of Conduct, and a range of policies and procedures.

We have implemented a Grievance Procedure and provided a grievance mechanism for employees to raise workplace related concerns. This procedure is linked to the Bank's Code of Ethics and Code of Conduct, as well as its Incident Management Policy. According to these procedures, every employee is eligible to provide information about incidents, either openly or anonymously, including any kind of harassment, be it moral, physical, or psychological. These policies are mandatory documents, which every employee has to be familiar with.

11

Human Rights Due Diligence Process

Due diligence process is an ongoing risk management process that a TBC 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.

We ensure this through the following actions:

1. Each new employee welcome package includes these documents, together with other important policies and procedures.
2. New employees have classroom trainings in which the Code of conduct, Code of Ethics, Incident Management Policy, and the Grievance Procedure feature as one of the key topics.
3. Any changes to these policies are delivered to all employees by e-mail.
4. These documents are available on the intranet to all employees of the Bank.
5. Employees are regularly tested on those policies.

To support our corporate culture, TBC Bank has implemented a whistleblowing policy, which is available to all employees. The policy identifies the rules and conduct required of all individuals working for the Group and defines employee rights and responsibilities.

Employees can submit complaints verbally or in writing through an open or anonymous letter to the HR manager, HR team, or their own management. They are highly encouraged to report incidents via anonymous channels for submissions of harassment, discrimination, or other grievances without delay to ensure their quick processing.

Incidents related to employee harassment, or physical, moral, or psychological pressure, the HR team manages the case, in cooperation with the Compliance Departments.

TBC conduct employee protection policy to prevention of all forms of discrimination, harassment, and violence against employees by employees in the workplace, promotion of human rights in the organization, definition of principles and standards of conduct. The right to freedom from discrimination, harassment and violence applies to all employees. The obligation to protect against discrimination, harassment and violence extends everywhere - both in and out of the office, on business trips or at official events, to any work-related event. The policy applies to all customers and all persons with whom employees have a relationship to provide services.

TBC track all incidents and publishes their number. The investigation process begins immediately after an incident is detected. When a case is anonymous, the complainant cannot be contacted. However, in non-anonymous cases, the employee is contacted to specify the details and, in certain cases, is informed about the decision. The HR Manager and/or HR Senior Staff, together with the complainant's line manager (unless the complaint was made against the immediate line manager or the complainant objects to the involvement of the line manager) investigate the complaint (be it harassment or anything else) with the utmost confidentiality. The purpose of the initial assessment is to establish whether the allegations are founded and whether there could be a case.

If the complaint is unfounded or unsustainable, the complainant will be informed accordingly and disciplined by HR for unnecessarily bringing a charge against another employee. If there is a case, HR in liaison with the complainant's line manager will decide on further actions in the Grievance Committee, together with the employee or their representative. Depending on the severity of the case, matters may be brought to the attention of the senior management. If this occurs, a management representative will participate in the Grievance Committee. When complaints are anonymous, HR in liaison with the HR Business Head / Deputy CEO will decide on further actions. Actions could take the form of a verbal warning, a written warning, or other disciplinary actions, including dismissal.

TBC cares about employee's safety and health, professional and occupational sickness prevention. Since our employees are our most valuable asset, it is our obligation to ensure protection of their lives, health and safety. Although workplace-related health and safety risks in the financial sector are not as high as in many other industries, they still exist. The biggest potential risks in our field include customer aggression, attacks on frontline employees. We cover this risk with employee protection policy. Risks related to cash collection, car park management activities are mitigated according to Labor safety policy.

Furthermore, creating a safe environment inside and outside the workplace for women and men is our priority. We ensure employee health, safety, well-being, and freedom from violence in the workplace under several policies. We prioritize flexibility and work-life balance through providing equal access to health insurance and promoting employees' well-being, improving productivity, and supporting long-term retention.

To ensure implementation of the Health, Safety and Environment (HSE) management system and standards, currently TBC outsource HSE management to an experienced company that, together with the Bank's team, developed an HSE policy and strategy. On a regular basis, HSE specialists carry out inspections and develop specific reports about the risks and hazards in all branches and offices, measure the microclimate and light in every branch and office to make a more comfortable working environment for employees. Risk assessments are updated also consistently, highlighting which risks and hazards should be controlled. We conduct fire and evacuation drills and trainings for all employees in HSE, fire, electric, ergonomics, emergency action plan, stress, and human factors. The Health and Safety framework applies to all employees and contractors, both full-time and part-time.

TBC treats for employee mental health, well-being. Hence, we conduct special employee satisfaction and happiness research annually, analyze the results, and develop action plans to improve employee loyalty, create comfortable working conditions, and motivate employees with a range of benefits. We adhere to local regulations on employment rights, while simultaneously aiming to implement international standards and best practices.

Customers:

The bank 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 Board of Directors of TBC Bank has adopted this Environmental Policy which describes the bank's commitment to sustainable finance as an integral component of responsible corporate governance the full policy is available at www.tbcbankgroup.com).

Suppliers:

TBC Bank recognizes that its operations can have direct and indirect impacts on the environment and the community in which it operates. The bank'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.

TBC developed an Environmental and Social Risk Management Questionnaire to screen suppliers as by analyzing the risks in the supply chains, companies can detect and prevent risks of human rights abuses by suppliers or partner companies.

Business partners must not use forced labor, whether in the form of prison labor, indentured labor or otherwise. We have zero-tolerance for forced labor, modern slavery, and human trafficking, and will ensure our supplier's operations are free from these practices.

The TBC supplier shall not engage in or support the use of corporal punishment, threats of violence or other forms of mental or physical coercion. The TBC supplier shall not make use of public warning and punishment systems, and shall not engage, support, or allow any form of harassment or abuse in the workplace.

The relationship we have with our suppliers is key to achieving this. We are highly selective about whom we work with, and we aim to build longstanding and trusted relationships across our supply chain to enable us to work in partnership to continuously improve our impact and operation.

We seek to establish relationships with entities that share the same principles and values as TBC. We also promote human rights awareness and respect along our value chain, including adoption of the legal contractual clauses.

To decrease environmental and social risks in the supply chain, we require all suppliers to sign TBC personal data protection, anti-corruption, environmental and tax avoidance clauses, which constitute an indispensable part of the contract and are mandatory for implementation.

The agreement with third parties (suppliers, partners, etc.) includes clauses about anti-corruption, anti-bribery, human rights policy, and rules of environmental impact.

In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by 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.

TBC Bank supplier selection and payment processes are regulated through the Supplier Relationships and Procurement Policy. When selecting new suppliers, we operate based on the principles of equality, transparency, and fair competition.

12

Internal and External Communication

12.1. Internal Communication

Responsible departments collect and monitor relevant information related to the company's Human Rights Policy, review this and related policies annually and provides information, advice, and assistance to managers and employees on human rights matters.

TBC will regularly report on the impact of Human Rights 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 is committed to:

- communicate the relevant tasks and demands to the staff 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 will conduct communication activities and disseminate information among company staff using all effective channels for internal communication.

12.2. Reporting

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

At the TBC level, regular reporting to the Audit, Risk Committee, the Corporate Governance and Nomination Committee and the ESG and Ethics Committee has to be established.

At the Group Company level, the internal reporting system has to be established in line with a respective organizational structure. Every Group Company shall deliver respective data in support of the reporting processes at the TBC and TBC Bank level.

At the TBC Bank level, the HR and ESG Committees adopt a communication strategy to ensure transparent integration, awareness raising and communication within and outside the organization. A system for regular internal reporting has to be established for the HR and ESG Committee.

In line with international best practices and regulatory requirements, TBC Bank 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 the Group's websites. The information can be disclosed as stand-alone document or can be integrated into existing reporting systems.

12.3. External Communication

Respecting human rights can be a visible part of TBC'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 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

13

Remediation

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 the TBC Bank's Procedure for addressing external E&S queries and concerns. Interested parties may submit their query on the webpage: <http://www.tcbank.ge/web/en/web/guest/e-s> to the following e-mail address: E&Srisk@tcbank.com.ge.

Everyone can deliver complaints/information through the following open and anonymous communication channels, also:

- Bank internal phone: 2 27 27 27 (*1998)
- Anonymous communication website: https://www.tcbank.ge/web/ka/web/guest/anonymous_hotline
- E-mail: incident_compliance@tcbank.com.ge

Anonymity is preserved in the following ways: the Bank internal number 2 27 27 27 (*1998) can be dialed from internal as well as external networks. On this number, the incoming call and the caller telephone number are not recorded if the caller does not want to present the identity.

When leaving a message on the anonymous website, the IP address is not identified, while information received through the website is automatically transferred to an outsourced company in an encrypted form and only afterwards becomes available to the Bank.

Anonymous complaints are received by two employees of the Compliance Department, the Head of the Compliance Department and the Head of the Compliance and Controlling Unit. 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 Compliance Department manages the process

Related Policies

A number of internal policies and procedures support our commitment to operating responsibly and ethically (both at a business and an individual level).

These include our:

- Code of Conduct;
- Code of Ethics;
- Diversity, Equality, and Inclusion Policy;
- Anti-Bribery Policy, Anti-Corruption and Anti-Facilitation of Tax Evasion Policy;
- Incident Response Policy (Whistleblowing Policy);
- Environmental Policy;
- Employee Protection Policy
- Labor safety policy
- HR policies and procedures.

These documents, as well our annual and sustainability reports are available on our website www.tcbankgroup.com.

Changes to this policy

We keep this Policy under regular review. Historic versions (if any) can be obtained by contacting ESG Coordinator or Board Secretary (where necessary).

Definitions

Staff: all employees, part-time and full-time workers, directors, and members.

Group Companies: TBC Bank Group PLC, TBC Bank, and any company or legal entity, including branches and representative offices, of which TBC Bank Group PLC, directly or indirectly, owns more than 50% of the issued share capital, has 50% or more of the voting power at general meetings of shareholders, has the power to appoint or remove the majority of the member of the board of directors or equivalent governing body or cast the majority of votes at meetings of the board of directors or equivalent governing body.

TBC: TBC Bank Group PLC and its Group Companies

TBC Bank: JSC TBC Bank

ESG: Environmental, Social, and Governance

ESG Committee: Respective Committee established and governing ESG matters

Board: Board of Directors of TBC Bank Group PLC

Supervisory Board: Supervisory Board of Joint Stock Company TBC Bank

