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	Code of Conduct for the Suppliers of Microfinance Organization Asian Credit Fund LLC	

Approved by
Management Board
of MFO Asian Credit Fund LLC

October 31, 2025


**CODE OF CONDUCT FOR SUPPLIERS
OF MICROFINANCE ORGANIZATION
ASIAN CREDIT FUND LLC**

Revision No. 1.0

Almaty 2025

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1. Document Goal and Applicability

1.1. This Code of Conduct for the Suppliers of Microfinance Organization Asian Credit Fund LLC describes the basic principles of business conduct that the Company expects from its Suppliers, contractors, and service providers working with it.

1.2. The Code is advisory in nature. The purpose of the Code is to share our sustainability principles with the Suppliers, inform them of the Company's intentions in the area of responsible procurement, and outline expectations from the Suppliers regarding compliance with these principles.

1.3. The provisions of the Code apply to the legal entities and individual entrepreneurs operating under the generally established regime who conclude contracts for the supply of goods, performance of works, or provision of services for ACF. I.e., the Code is intended for organizations engaged in economic activities that may affect labor, social, environmental, or ethical aspects.

1.4. The provisions of this Code do not directly apply to individuals providing the individual services. In such cases, the Company expects fair fulfillment of obligations, compliance with legislation, confidentiality, and ethical standards of business interaction within the framework of the concluded contract.


2. Terms and Definitions

- 1) **Code of Conduct for the Suppliers** - Code
- 2) **Corruption** - abuse of official position, giving or receiving bribes, commercial bribery.
- 3) **Fraud** - any illegal actions prohibited by the applicable legislation of the Republic of Kazakhstan, characterized by deception, concealment, or abuse of trust. Fraud is committed by individuals or legal entities for the purpose of obtaining benefits, expressed in abuse of trust, misleading others about the essence and nature of the transactions when entering into civil-law relations in any form, obtaining an advantage in their activities, and illegal remuneration when concluding oral and written transactions (may be committed personally by the supplier, its representatives and employees, or in collusion with a group of persons entering into civil-law relations), relating to property or the provision of services, or in the deliberate evasion of payment of money, remuneration, compensation for damage, or actions that caused damage, lost profits, and reputational risks, or failure to provide services for the purpose of personal gain or other interests (illegal acquisition of property, rights to it, etc.).
- 4) **Responsible procurement** - is the process of selecting and interacting with Suppliers in which, along with economic criteria (price, quality, deadlines), environmental, social, and ethical aspects of their activities are taken into account in order to ensure sustainable and fair business practices.
- 5) **Supplier** - a legal entity or individual entrepreneur who has a contractual relationship with ACF for the supply of goods, the performance of works, or the provision of services.
- 6) **Microfinance Organization Asian Credit Fund Limited Liability Company** - ACF, Company
- 7) **Stable development** - development focused on creating value for all by achieving a balance between economic, environmental, and social aspects of the activity.

3. Policy Principles

3.1. Compliance with legislation and prohibition of corruption

3.1.1. ACF expects that Suppliers are duly registered as legal entities or individual entrepreneurs and hold all necessary licenses, permits, and authorities required for their specific activities.

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3.1.2. ACF expects Suppliers to comply with all applicable laws in the countries where they operate.

3.1.3. ACF does not tolerate bribery, corruption, extortion, or fraud. This includes giving, demanding, or receiving bribes, as well as participating in improper payments or corrupt practices.

3.2. Fair business dealing and confidentiality

3.2.1. ACF expects that the Suppliers comply with the laws relating to the principle of justice and applicable in all countries where they operate. Suppliers undertake to conduct themselves ethically in their business practices, operate in accordance with the principles of justice, and in accordance with the applicable regulations related to fair competition.

3.2.2. The Company expects Suppliers to ensure the accuracy, completeness, relevance, and transparency of all data, documents, and information provided to the Company, and to refrain from providing false or misleading information.

3.2.3. ACF expects Suppliers to keep the confidentiality of the information received that is proprietary to the Company and never to use such information for their own benefit.

3.2.4. ACF does not permit the disclosure of the confidential information about the Company to third parties without the Company's explicit permission.

3.3. Performance of the work based on voluntarily agreed and documented terms of employment

The Company expects that all Suppliers' employees, both permanent and temporary, are provided with the documents governing their employment relationship with the Company, which are drawn up by mutual consent and take into account all the statutory and contractual rights of the employees.

3.4. Equality, dignity, and respectful attitude to all employees

3.4.1. The Company expects that the Suppliers comply with the applicable laws and regulations regarding equality and treat all employees with respect and dignity.

3.4.2. ACF expects that the Suppliers with whom the company cooperates provide an equal working environment in which everyone is treated with respect and without discrimination based on race, age, gender, ethnic origin, skin color, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, position, political views, or other distinguishing characteristics. There is also no discrimination in employment, including hiring, labor payment, promotion, work discipline, termination of employment, and retirement.

3.5. Voluntary Labour Conditions


The Company does not accept forced labor and expects its Suppliers to ensure that the labor relations between these companies and their employees are based on the principle of voluntariness, without forced labor.

3.6. Fair Labour Payment for All Employees

ACF expects that the Suppliers' companies provide the employees with wages, overtime pay, and paid leave that meet the minimum standards established by law.

3.7. Working Hours and Remuneration

3.7.1. The Company expects that the Suppliers do not require their employees to work beyond the normal and overtime hours permitted by the laws of the country in which the employees work. All forms of work, including overtime, are voluntary.

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3.7.2. ACF expects its Suppliers to comply with all provisions set forth in the legislation and collective agreements to which they are subject regarding remuneration, social benefits, and working hours.

3.8. Freedom to exercise the employees' rights to form and/or join associations or refuse to join them.

ACF expects that the Suppliers recognize and respect the rights of the employees to freedom of association and collective bargaining. They also do not exert pressure on the employees when they exercise their rights to join or refuse to join any organization or participate in any social-political campaigns or movements.

3.9. Health and safety of the employees in the workplace.

ACF expects the Suppliers to adhere to health and safety rules and regulations, provide each employee with a safe and healthy working environment, and strive to create safe workplaces.

3.10. Compliance with environmental laws and regulations.

3.10.1. ACF expects the Suppliers to apply and comply with environmental legislation and strive to minimize their impact on the environment.

3.10.2. ACF expects the Suppliers to take measures aimed at preserving the environment in their activities.

4. Final Provisions

4.1. The Company shall familiarize the Suppliers with this Code by posting it on the ACF corporate website and in the contracts (for the supply of goods, performance of works, or provision of services). By signing the agreement with the Company, the supplier confirms that it is familiar with the content of the ACF Code of Conduct for Suppliers and that, at the time of concluding the contract, its activities comply with the principles set out in the Code.

4.2. The issues not covered by this Code shall be governed by the applicable laws of the Republic of Kazakhstan. All amendments or additions to this Code shall be approved by the MFO Board.

4.3. This Code shall be reviewed and updated as necessary.

Document information

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Revision History

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