

“Approved” by
decision of the Management Board of
JSC “EIC “KazakhExport”
dated 13 June 2018 No. 414

**Anti-Corruption Policy of
the Joint-Stock Company “Export Insurance Company “KazakhExport”**

Astana, 2018

SUMMARY ON BYLAW

Bylaw title	Anti-Corruption Policy of JSC “EIC “KazakhExport”
Bylaw owner	Compliance Controller
Level of access	Public
Measures for familiarization activities of all structural unite with the bylaw	Email newsletter within 1 (one) business day from the date of placement of the bylaw on the “Internal Portal” network drive

Amendments and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport”:

№	Introduced amendments, additions	Minute date and number
1	In accordance with the decision of the Management Board of JSC “EIC “KazakhExport” amendments and additions were made	on «30» December 2019 No. 55
2.	In accordance with the decision of the Management Board of JSC “EIC “KazakhExport” amendments and additions were made	on «____»_____20____No. ____
3.	In accordance with the decision of the Management Board of JSC “EIC “KazakhExport” amendments and additions were made	on «____»_____20____No. ____
4.	In accordance with the decision of the Management Board of JSC “EIC “KazakhExport” amendments and additions were made	on «____»_____20____No. ____

Recognized as invalid by the decision of the Management Board of JSC “EIC “KazakhExport” (minutes dated “____” _____20____, No.____).

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Part 1. General provisions

1. The Anti-Corruption Policy of the Joint-Stock Company “Export Insurance Company “KazakhExport” (hereinafter referred to as the Policy) has been elaborated in accordance with the legislation of the Republic of Kazakhstan and other internal documents of the Joint-Stock Company “Export Insurance Company “KazakhExport” (hereinafter referred to as the Company).

2. The Policy sets out:

- 1) main provisions on combating corruption in the Company;
- 2) management and organizational framework for the prevention of corruption offenses;
- 3) measures to combat corruption, as well as minimize and (or) eliminate their consequences;
- 4) fostering behavior among the employees of the Company for strict observance of the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company.

3. The purpose of the Policy is to strengthen control over the prevention and detection of corruption, as well as to create an atmosphere of its tough rejection within the Company.

4. The objective of the Policy is to form the legal culture of the Company’s employees, which ensures compliance with the principles of honesty and transparency in the performance of labor duties.

5. The Policy uses the following terms and definitions:

- 1) conflict of interest – a contradiction between the personal interests of officials and their official powers, in which the personal interests of these persons may lead to improper performance of their official powers.

- 2) corruption offense – an unlawful guilty act (action or inaction) with signs of corruption, for which administrative or criminal liability is established by law;

- 3) corruption – illegal use by an official, an employee of the Company of their official (service) powers and related opportunities in order to obtain or extract personally, or through intermediaries, material (non-material) benefits and benefits for themselves or third parties, as well as bribery of these persons by providing benefits and advantages;

- 4) counteracting corruption – activities of officials, employees of the Company within their powers to prevent corruption, including formation of an anti-corruption culture in society, identify and eliminate causes and conditions conducive to the commission of corruption offenses, as well as to identify, suppress, disclose and investigate corruption offenses, and eliminate their consequences;

- 5) counterparty – an individual or legal entity with whom the Company has entered or plans to enter into relations regulated by civil legislation.

- 6) official – a member of the Management Board, the Board of Directors of the Company or a person performing organizational and administrative or administrative functions in the Company;

subparagraph 7) was amended in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

- 7) employee – an individual who is in employment relationship with the Company and directly performs work under an employment contract, with the exception of members of the Management Board of the Company;

- 8) authorized anti-corruption body – central executive body in the field of public service and anti-corruption, and its department, their territorial divisions, exercising, within their powers, functions of implementing the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption;

subparagraph 9) was amended in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

- 9) Compliance Controller – an employee of the Company who is responsible for anti-corruption work in the Company.

Part 2. Types of corruption offenses

6. Corruption offenses shall include acts for which the current legislation of the Republic of Kazakhstan provides administrative or criminal liability, including:

- 1) giving or receiving a bribe, as well as mediation in the transfer of a bribe;
- 2) obtaining other property benefits and advantages in accordance with the anti-corruption legislation;
- 3) deliberate distortion of financial statements;
- 4) unlawful use and (or) misappropriation and (or) theft of the Company's assets: theft of funds, misuse of funds, theft of fixed assets, inventory items;
- 5) actions of a corrupt nature, abuse of official powers and exceeding use of official powers: the use of their official powers and related opportunities for obtaining material benefits, violations in the procurement of goods, works, services, expressed in forging and (or) misinterpretation of documents, special overstatement or understating the price of goods, works, services to receive monetary rewards, expensive gifts or other benefits, deliberate destruction of information relevant to the activities of the Company, destruction of databases or alteration of information in them, implementation of programs to provide access to third parties or for personal purposes;
- 6) actions taken by counterparties in order to obtain additional profit, other actions, as a result of which damage to the Company and (or) the state may be caused;
- 7) provision by counterparties of knowingly false, altered or distorted information for the purpose of deceiving, or misleading and making a profit at the expense of the Company;
- 8) actions aimed at unauthorized penetration into the information systems of the Company or seizure of confidential information in order to extract profit and (or) damage the activities and (or) negatively affect the reputation of the Company;
- 9) other types of corruption offenses provided for by the current legislation of the Republic of Kazakhstan.

Part 3. Anti-corruption measures

7. Anti-corruption measures shall include:
- 1) anti-corruption monitoring;
 - 2) internal analysis of corruption risks;
 - 3) approval of anti-corruption standards;
 - 4) acceptance by the officials of the Company of anti-corruption restrictions;
 - 5) prevention and resolution of conflicts of interest;
 - 6) submission of reports to the authorized anti-corruption body on the work implemented to counter corruption in the Company;
 - 7) other measures provided for by the current legislation of the Republic of Kazakhstan.

Part 4. Anti-corruption monitoring

paragraph 8 is set out in the wording in accordance with the amendment and additions approved by the decision of the Management Board of JSC "EIC "KazakhExport" (Minutes of December 30, 2019 No. 55)

8. Anti-corruption monitoring is the activities of the Company to collect, process, summarize, analyze and evaluate information related to the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption by the Company.

paragraph 9 is set out in the wording in accordance with the changes and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes of December 30, 2019 No. 55)

9. The subject of anti-corruption monitoring shall be the activities of the Company. Anti-corruption monitoring shall be carried out in the manner prescribed by the regulatory legal act of the authorized state body of the Republic of Kazakhstan, including by:

- 1) conducting a compliance examination of draft internal regulations of the Company for the presence of corruption-related norms;
- 2) monitoring of the legislation of the Republic of Kazakhstan, as well as the legislation of foreign states that affect the activities of the Company;
- 3) consideration of appeals from clients of individuals and legal entities on the facts of manifestations of corruption on the part of officials and employees of the Company;
- 4) holding official investigations on the revealed facts of violation of the legislation of the Republic of Kazakhstan and internal documents of the Company with signs of a corruption offense;
- 5) monitoring of publications in the media on the activities of the Company and its officials;
- 6) studying the law enforcement practice of state bodies and subjects of the quasi-public sector in the field of combating corruption;
- 7) study of the reasons and conditions conducive to corruption in the activities of persons found guilty in the manner prescribed by law;
- 8) study of materials and other procedural documents prepared by the Department of Legal Support of the Company for Criminal Cases of Corruption and Fraud or Cases of Administrative Corruption Offenses.

paragraph 10 was amended in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

10. The Compliance Controller shall conduct anti-corruption monitoring on a quarterly basis, which results, drawn up in accordance with Annex 4 to this Policy, shall serve as the basis for an internal analysis of corruption risks.

Part 5. Internal analysis of corruption risks

11. The internal analysis of corruption risks (hereinafter referred to as the Analysis) shall be the activities aimed at identifying and studying the reasons that contribute to the commission of corruption offenses.

12. The decision to conduct the Analysis shall be made based on the results of anti-corruption monitoring and the results of the assessment of compliance risks carried out in the manner determined by the internal regulations of the Company.

13. The subject of the Analysis shall be the activities of the structural unit of the Company (hereinafter referred to as the Unit).

paragraph 14 was amended in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

14. The analysis shall be carried out by the Compliance Controller in accordance with the order of the Chairman of the Management Board of the Company (hereinafter referred to as the Order) based on the Compliance Controller’s memo, substantiating the need for the Analysis of the Company Unit. If necessary, the Compliance Controller, in agreement with the Chairman of the Management Board of the Company, may involve employees of other disinterested structural units of the Company.

15. The order shall include the following information:

- 1) name of the Unit, which activity is subject to Analysis;
- 2) direction of the Analysis;
- 3) full name of an employee of the Company responsible for conducting the Analysis;
- 4) period of the Analysis;

- 5) official of the Company who is entrusted with the management, coordination and responsibility for conducting the Analysis.
16. The analysis shall be carried out in the following areas:
 - 1) identification of corruption risks in the internal regulations of the Company affecting the activities of the Unit;
 - 2) identification of corruption risks in organizational and management activities of the Unit.
17. Organizational and managerial activities of the Unit shall include the following issues:
 - 1) personnel management, including staff turnover;
 - 2) settlement of conflicts of interest;
 - 3) compliance of the Unit's activities with the Company's internal regulations and the legislation of the Republic of Kazakhstan.
18. The sources of information for the Analysis shall be:
 - 1) internal regulatory and other documents of the Company, regulatory legal acts of the Republic of Kazakhstan affecting the activities of the Division;
 - 2) results of inspections previously carried out by state bodies or the Internal Audit Service of the Company in relation to the Unit;
 - 3) results of assessment of compliance risks;
 - 4) publications in the media;
 - 5) applications of individuals and legal entities received by the Unit;
 - 6) acts of prosecutor's supervision;
 - 7) judicial acts;
 - 8) other information, which provision is allowed by the legislation of the Republic of Kazakhstan.
19. Responsibility for the timely and complete submission of the information specified in paragraph 18 of this Policy shall lie with the head of the Unit.
20. Based on the results of the Analysis, an analytical report shall be prepared, containing:
 - 1) information on the identified corruption risks;
 - 2) recommendations for their elimination;
 - 3) timing of implementation of recommendation to eliminate the identified corruption risks.
21. Analytical report shall be coordinated with the head of the Unit, in whose activities the Analysis was carried out, and signed by the official specified in subparagraph 5) of paragraph 15 of this Policy.
22. Analytical report with recommendations for eliminating the identified corruption risks shall be submitted to the Chairman of the Management Board of the Company for consideration and instructions for taking measures to eliminate them.
23. The results of the Analysis shall be posted on the Internet resource of the Company no later than 5 (five) business days from the date of the corresponding consent of the Chairman of the Management Board of the Company.

Part 6. Anti-corruption standards

24. Anti-corruption standards shall be a system of recommendations established for the Company's activities aimed at preventing corruption. The Company's anti-corruption standards shall be presented in Annex No. 1 to this Policy.

Part 7. Anti-corruption restrictions

25. In order to prevent the officials of the Company from committing actions that may lead to the use of their powers for personal, group and other non-official interests, these persons shall assume anti-corruption restrictions on:

1) failure to carry out activities incompatible with the performance of functional duties in the Company;

2) inadmissibility of joint service (work) of close relatives, spouses and in-laws;

3) use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;

subparagraph 4) is set out in the wording in accordance with the amendments and additions approved by the decision of the Management Board of JSC "EIC "KazakhExport" (minutes of December 30, 2019 No. 55)

4) inadmissibility of accepting gifts in connection with the performance of their official powers, with the exception of cases stipulated by the current legislation of the Republic of Kazakhstan and internal documents of the Company.

the sixth paragraph is set out in the wording in accordance with the amendments and additions approved by the decision of the Management Board of JSC "EIC "KazakhExport" (minutes of December 30, 2019 No. 55)

Consent of officials who are members of the Management Board of the Company to accept anti-corruption restrictions shall be formalized by the Human Resources Management Department of the Company in the form in accordance with Annex 3 to this Policy no later than 5 (five) business days from the date of their assumption of office.

Failure to accept anti-corruption restrictions by officials of the Company shall entail refusal to hire or dismiss from office, their failure to comply in the absence of signs of a criminal act and an administrative offense shall be the basis for termination of their powers.

26. Officials of the Company shall be prohibited from:

1) independently participate in the management of an economic entity, if management or participation in the management of an economic entity is not included in their official duties in accordance with the laws of the Republic of Kazakhstan, to contribute to the satisfaction of the material interests of organizations or individuals by unlawful use of their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activity, except for the acquisition and (or) sale of shares of open and interval mutual investment funds, bonds on the organized securities market, shares of commercial organizations (ordinary shares in an amount not exceeding five percent of the total number of voting shares of organizations) for organized securities market;

3) engage in other paid activities, except for pedagogical, scientific and other creative activities.

27. Officials of the Company shall have the right to lease (rent out) a dwelling place belonging to them by right of ownership and receive income from such lease.

28. Officials of the Company, within 30 (thirty) calendar days from the date of taking office, shall be obliged to transfer to trust management for the duration of these functions in the manner prescribed by the laws of the Republic of Kazakhstan, their property, which use entails the receipt of income, except for money, bonds, shares of open-ended and interval mutual investment funds legally owned by these persons, as well as property transferred into property lease.

29. The contract for the trust management of property shall be subject to notarization.

paragraph 30 was amended in accordance with the decision of the Management Board of JSC "ESC "KazakhExport" (minutes of December 30, 2019 No. 55)

30. In case of acquisition of shares, the officials of the Company shall be obliged to transfer them to trust management within 30 (thirty) calendar days from the date of acquisition in the manner established by the laws of the Republic of Kazakhstan. Officials who are members of the Management Board of the Company shall be obliged to submit to the Human Resources Management Department of the Company a copy of a notarized contract for trust management of property within 10 (ten) business days after the notarization of the contract.

paragraph 31 is set out in the wording, in accordance with amendment and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

31. Failure to fulfill the obligations stipulated by this Part by officials who are members of the Management Board of the Company shall be the basis for the application of disciplinary sanctions to them, including the early termination of their respective powers.

32. Officials of the Company may not hold positions directly subordinate to positions held by their close relatives and (or) spouse, as well as in-laws.

Officials of the Company who violate the requirements of this paragraph of the Policy, if they do not voluntarily eliminate it within three months from the date of detection of this violation, shall be subject to transfer to positions excluding such subordination, and if such transfer is impossible, one of these employees shall be subject to dismissal or other exemption from these functions.

Note.

Close relatives shall be parents (parent), children, adoptive parents, adopted children full and half siblings, grandfather, grandmother, grandchildren, and in-laws – siblings, parents and children of the spouse.

The policy was supplemented with clause 32-1 in accordance with amendments and additions approved by decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

32-1. The Compliance Controller shall monitor compliance with the adopted anti-corruption restrictions by officials who are members of the Company’s Management Board.

The policy is supplemented by clause 32-2 in accordance with the amendments and additions approved by the decision of the Management Board of JSC ESC KazakhExport (Minutes dated December 30, 2019 No. 55)

32-2. Officials who are members of the Management Board of the Company, at least once a year, shall provide, within 3 (three) business days, upon request of the Compliance Controller, written information on compliance with anti-corruption restrictions provided for in this Policy.

All cases that violate or may violate the anti-corruption restrictions provided in this Policy, officials who are members of the Company’s Management Board, as well as the Human Resources Management Department, shall inform the Compliance Controller no later than 2 (two) business days from the day they become known about such cases.

The policy is supplemented by clause 32-3 in accordance with amendments and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes dated December 30, 2019 No. 55)

32-3. If violations of anti-corruption restrictions are detected, the Compliance Controller, no later than 2 (two) business days from the date of their detection, shall bring the relevant information to the attention of the Chairman of the Management Board of the Company and the Human Resources Management Department, indicating the need to eliminate such violations within the time frame provided in this Policy and other internal documents of the Company.

Information on the revealed facts of violations of anti-corruption restrictions and the measures taken in this regard shall be included in the quarterly report on the work carried out by the Compliance Controller, which is provided to the Audit Committee and the Board of Directors of the Company.

Part 8. Prevention and resolution of conflicts of interest

the first paragraph of paragraph 33 is set out in the wording according to amendments and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

33. Officials of the Company shall be prohibited from performing their official duties if there is a conflict of interest. The Company officials shall take measures to prevent and resolve conflicts of interest. Officials of the Company shall immediately notify the Management Board, the Board of Directors of the Company (through the Corporate Secretary), their immediate supervisor (if any), and

the Compliance Controller in writing about a conflict of interest that has arisen or about the possibility of its occurrence as soon as they become aware of it.

The Chairman of the Board of Directors, Chairman of the Management Board of the Company, upon requests from officials or upon receipt of information from other sources, shall take timely measures in the manner determined by the internal regulatory documents of the Company to resolve corporate conflicts and conflicts of interest.

Part 9. Formation of anti-corruption culture

paragraph 34 was amended in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (minutes of December 30, 2019 No. 55)

34. Formation of anti-corruption culture shall be the duty of every manager and employee of the Company and shall be carried out by the Compliance Controller, the Human Resources Management Department through a set of educational measures, as well as by a PR manager through a set of information and organizational measures.

Note.

1. Anti-corruption education means a continuous process of training the Company’s employees in order to formulate an active civic stance against corruption.

2. Informational and organizational activities mean carrying out explanatory work in the media, organizing socially significant events and other measures provided by the legislation of the Republic of Kazakhstan.

Part 10. Submission of reports to the authorized body for combating corruption

35. The Company shall submit information on the work carried out to combat corruption to the authorized body for combating corruption.

36. The information shall contain:

- 1) information about the state and ongoing work in the field of combating corruption;
- 2) results of the Analysis;
- 3) information on the execution or non-fulfillment (indicating the reasons for non-fulfillment) of the Company’s plans on combating corruption;

subparagraph 4) is set out in the wording in accordance with the amendments and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes of December 30, 2019 No. 55)

4) conclusions and proposals, as well as other information that, in accordance with the requirements of the current legislation of the Republic of Kazakhstan, shall be subject to reflection in the report submitted to the authorized body for combating corruption.

37. The information shall be signed by the Chairman of the Management Board of the Company or a person replacing him, who ensures the accuracy and completeness of the information, and the timeliness of its submission.

38. The Company shall submit information twice a year:

- 1) based on the results of half a year – no later than the 25th day of the month following the reporting period;
- 2) based on the results of the year – no later than the 25th day of the month following the reporting year.

Part 11. Measures to prevent corruption

paragraph 39 is set out in the wording in accordance with the amendments and additions approved by the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes of December 30, 2019 No. 55)

39. Prevention of corruption in the Company shall be carried out in the manner prescribed by the relevant internal regulatory document of the Company, including by:

- 1) verification of counterparties to establish business reputation and identify conflicts of interest;
- 2) registration of affiliated persons of the Company and persons associated with it by special relations;
- 3) expert examination of draft internal regulatory documents of the Company in order to exclude norms that create conditions for corruption in the Company;
- 4) ensuring information security in the Company;
- 5) ensuring functioning of feedback mechanisms, in which officials, employees and counterparties of the Company, as well as individuals and legal entities can report their suspicions to the Compliance Controller or provide him with information received from other persons about possible corruption offenses committed by any official, an employee of the Company, an official, an employee, a representative of a counterparty of the Company;
- 6) conducting official investigations on possible cases of corruption.

Part 12. Final provisions

40. Officials and employees of the Company for committing corruption offenses shall bear criminal, administrative, civil and disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan.

41. Officials and employees of the Company to whom measures of criminal, administrative or disciplinary liability were applied for committing corruption offenses shall not be exempt from liability for compensation for material damage to the Company.

42. Responsibility for the fulfillment of the requirements of the Policy shall be borne by the officials and employees of the Company within their competence.

43. Officials and employees of the Company from the date of adoption of the Policy, and newly hired from the moment of the beginning of the performance of official and (or) labor duties in the Company shall confirm in the form provided in Annex No. 2 to the Policy that they have studied, understood and undertake to faithfully follow the Policy.

44. Anything else not provided by this Policy shall be governed by the current legislation of the Republic of Kazakhstan. If there are contradictions of this Policy to the norms of the legislation of the Republic of Kazakhstan, the norms of the legislation of the Republic of Kazakhstan shall apply.

Annex 1
to the Anti-corruption Policy of the
JSC “EIC “KazakhExport”

**Anti-corruption standards of the
Joint-Stock Company
“Export Insurance Company “KazakhExport”**

1. Anti-corruption standards of the Joint-Stock Company “Export Insurance Company “KazakhExport” (hereinafter referred to as the Company) have been elaborated in accordance with paragraph 2 of Article 10 of the Law of the Republic of Kazakhstan “On Combating Corruption” and internal documents of the Company.

2. Anti-corruption standards are aimed at achieving an atmosphere of intolerance towards any manifestations of corruption in the Company by creating a system of value and moral anti-corruption guidelines for behavior for the employees of the Company (hereinafter referred to as employees) in the performance of their duties and functions.

3. Name of the sphere of public relations: insurance (reinsurance) activities.

4. Anti-corruption standards define the following norms of behavior for the Company’s employees:

1) be guided by the principle of legality, requirements of the Constitution, laws and other regulatory acts of the Republic of Kazakhstan, strictly observe anti-corruption legislation;

2) ensure the observance and protection of the rights, freedoms and legal interests of individuals and legal entities;

3) prevent the commission of actions that could discredit the Company;

4) report to the immediate or direct supervisor about the occurrence of a conflict of interest, personal interest in the performance of official duties, about the inclinations to corrupt behavior and the receipt of gifts;

5) not be guided by personal and (or) selfish interests in the performance of official duties;

6) refrain from addressing colleagues and managers with unlawful requests that violate the established procedure for relationships, which may influence their impartial decision in the performance of their official duties;

7) not to persuade other employees to commit corruption offenses and not to encourage such actions;

8) not to accept gifts in connection with the performance of official duties and powers;

9) not to use official and other information that is not subject to dissemination in order to obtain or extract material and non-material benefits and advantages;

10) refuse to appoint to a position if it is associated with direct subordination or control to persons who are in close kinship and family relations (*parents, spouses, brothers, sisters, children, in-laws (brothers, sisters, parents and children of a spouse)*);

11) be active in combating corruption, in disclosing corruption offenses;

12) immediately report to the management of the Company on known facts of corruption, including on the incline to receive any benefit for expedited consideration of materials or facts of red tape;

13) immediately in writing inform direct or immediate supervisor about doubts about the legality of the order received for execution;

14) contact a superior manager if the immediate manager is involved in a conflict of interest;

15) support and demand from colleagues to observe a high legal anti-corruption culture;

16) take measures on an ongoing basis to eliminate the causes and conditions of a possible conflict of interest, corruption offenses and their consequences;

17) refrain from assisting anyone in the implementation of entrepreneurial and (or) other activities related to the extraction of income;

18) refrain from representing or lobbying interests of third parties, as well as taking actions on their behalf;

19) not to use for non-official purposes the means of material, technical, financial and information support, as well as other state property and official information.

5. Managers at all levels in relations with subordinates shall:

1) prevent cases of selection and placement of personnel on the basis of kinship, community and personal loyalty, ensure compliance with the principles of meritocracy;

2) accurately determine the tasks and scope of official powers of subordinate employees;

- 3) not to allow uneven distribution of the work load between employees who are subordinate;
 - 4) show fairness and objectivity in assessing the performance of subordinates, as well as in the application of incentives and penalties;
 - 5) not to give subordinates clearly impracticable or beyond the scope of their official duties, as well as orders that contradict the legislation;
 - 6) not to use the official position to influence the activities of subordinates in resolving issues of a non-official nature;
 - 7) not to force subordinate employees to commit corruption offenses;
 - 8) prevent and suppress the facts of violation of the anti-corruption legislation by subordinates and other employees;
 - 9) timely take comprehensive measures to resolve the conflict of interest that a subordinate employee has in the course of his job duties;
 - 10) take comprehensive measures to prevent corruption;
 - 11) eliminate the causes and conditions conducive to the commission of corruption offenses by subordinates;
 - 12) prevent the involvement of subordinates to perform unofficial or personal tasks;
 - 13) set an example for subordinate employees with their impeccable behavior.
6. Managers at all levels shall ensure compliance with these Anti-Corruption Standards and organize anti-corruption work among their employees.

CONFIRMATION

Use this form in order to confirm that you have carefully studied, understood and undertake to faithfully follow the Anti-Corruption Policy of the Joint Stock Company “Export Insurance Company “KazakhExport” (hereinafter referred to as the Policy).

Officials and employees of the Joint Stock Company “Export Insurance Company “KazakhExport” (hereinafter referred to as the Company) are obliged to send to the Human Resources Management Department this completed and signed form from the date of adoption of the Policy, and newly hired ones – from the moment of the beginning of the performance of labor and (or) official duties in the Company.

<p><i>Please fill out this form, sign and send it in hard copy to the Human Resources Management Department of the Company</i></p>	<p>From the moment you start performing your labor and (or) official duties in the Company, you must carefully study, understand and follow the Policy in good faith.</p> <p>Your confirmation</p>	
	<p><i>(Please tick the appropriate boxes)</i></p>	
	<input type="checkbox"/>	<p>I confirm that I have studied and understood the Policy.</p>
	<input type="checkbox"/>	<p>I agree to follow the Policy in good faith.</p>
	<p><i>Please sign here</i></p>	
	<p><i>Full name</i></p>	
<p><i>Signature</i></p>		<p><i>Date</i></p>

The policy is supplemented by Annex 3 in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes dated December 30, 2019 No. 55)

Annex 3 to the
Anti-Corruption Policy of
JSC “EIC “KazakhExport”

**Consent
on the adoption of anti-corruption restrictions**

I, (full name) _____, holding the position _____ of the Joint-Stock Company “Export Insurance Company “KazakhExport”, in accordance with paragraph 1 of Article 12 of the Law of the Republic of Kazakhstan “On Combating Corruption”, taking into account the specifics established by Articles 13, 14, 15 of the said Law, as well as in order to comply with the requirements of the Anti-Corruption Policy in JSC “EIC “KazakhExport”, I accept the following anti-corruption restrictions on:

- 1) carrying out activities incompatible with the performance of state functions;
- 2) inadmissibility of joint work of close relatives, spouses and in-laws;
- 3) the use of official and other information that is not subject to official distribution in order to obtain or extract property and non-property benefits and advantages;
- 4) accepting gifts in connection with the performance of their official powers, with the exception of cases provided by the current legislation of the Republic of Kazakhstan and internal documents of the Company;
- 5) taking actions that, directly or indirectly, can lead to a conflict of interest, and in case of its occurrence, notify the Board of Directors of JSC “EIC “KazakhExport” in writing in the manner and terms stipulated by the relevant internal regulatory documents of JSC “EIC “KazakhExport”.

Signature of Official _____

date _____

The policy is supplemented by Annex 4 in accordance with the decision of the Management Board of JSC “EIC “KazakhExport” (Minutes dated December 30, 2019 No. 55)

Annex 4 to the
Anti-Corruption Policy of
JSC “EIC “KazakhExport”

**Results of anti-corruption monitoring
held in JSC “EIC “KazakhExport” for ____quarter of ____year**

I. Introductory part

1. Subject of anti-corruption monitoring:
2. Anti-corruption monitoring was held by ____ (indicate name and position), office phone ____, e-mail address ____.
3. Period of anti-corruption monitoring: started ____ finished ____.
4. Observed period: activity ____.

II. Information and analytical part

Quantitative and qualitative indicators characterizing the state and causes of corruption in the activities of JSC “EIC “KazakhExport”.

III. Final part

Conclusions. Recommendations and suggestions for improving the anti-corruption measures taken.