

Appendix No. 17  
to the minutes of the Board of  
Directors of the Export Credit Agency  
of Kazakhstan JSC  
dated February 28, 2025, No. 03

"Approved"  
by decision of the Board of Directors  
of the Export Credit Agency of  
Kazakhstan JSC  
dated February 28, 2025  
Protocol No. 03

**Anti-corruption policy  
of the Export Credit Agency of Kazakhstan Joint Stock Company**

**Astana, 2025**

## SUMMARY OF IRD

Name of the IRD	Anti-corruption policy of the Export Credit Agency of Kazakhstan JSC
Owner of the IRD	Compliance Service
Access level	Publicly available
Activities aimed at familiarizing structural units with the IRD	E-mail distribution within 1 (one) business day from the date of posting the IRD on the Internal Portal network drive

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## **Chapter 1. General provisions**

1. The Anti-Corruption Policy of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan and other internal documents of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Company).

2. The policy sets:

- 1) the main provisions of combating corruption in Society;
- 2) managerial and organizational bases for the prevention of corruption offenses;
- 3) measures to combat corruption, reduce the risks of their occurrence, as well as minimize and (or) eliminate their consequences;
- 4) fostering a culture of behavior among the Company's employees in strict compliance with the requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

3. The Policy uses the following terms and definitions:

1) administrative and economic functions are the right to manage and dispose of property held on the Company's balance sheet in accordance with the procedure established by the laws of the Republic of Kazakhstan and internal regulatory documents;

2) Anti-corruption monitoring is the Company's activity in collecting, processing, summarizing, analyzing and evaluating information related to the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as perception and assessment of the level of corruption in Society;

3) Anti-corruption restrictions are restrictions established by the Law of the Republic of Kazakhstan on Combating Corruption and aimed at preventing corruption offenses;

4) close relatives – parents, children, adoptive parents, adopted children, full and half siblings, grandparents, grandchildren;

5) Internal analysis of corruption risks is the Company's activity to identify and study the causes and conditions that contribute to the commission of corruption offenses;

6) insider information - reliable information about securities (derivative financial instruments) The Company, transactions with them, as well as about the Company, its activities that constitute a commercial secret, as well as other information unknown to third parties, the disclosure of which may affect changes in the value of securities (derivative financial instruments) and the Company's activities. Insider information is considered insider information from the moment of its occurrence until its disclosure to an unlimited number of persons in accordance with the legislation of the Republic of Kazakhstan and/or internal regulatory documents of the Company;

7) The Compliance Service is a structural subdivision of the Company directly subordinate to and accountable to the Board of Directors of the Company, which organizes and conducts measures to counteract the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction in the Company's activities, internal control over the compliance of the Company's activities with the requirements of the legislation of the Republic of Kazakhstan, international standards, internal regulatory documents of the Company, the implementation of the Company's Compliance Risk Management Policy and compliance control functions, the organization and functioning of the anti-corruption and fraud system, as well as the implementation of other functions in accordance with the Regulations on the Compliance Service;

8) conflict of interests is a contradiction between the personal interests of persons performing managerial functions in a Company and their official powers, in which the personal interests of these persons may lead to non-fulfillment and (or) improper fulfillment of their official duties;

9) counterparty is a natural or legal person with whom the Company has entered into or plans to enter into a relationship regulated by civil law;

10) A corruption offense is an unlawful culpable act (action or omission) that has signs of corruption, for which administrative or criminal liability is established by law;

11) Corruption risk is the possibility of causes and conditions contributing to the commission of corruption offenses;

12) corruption is the illegal use by a person performing managerial functions in the Company, an employee of the Company, of his official (official) powers and related opportunities in order to obtain or extract, personally or through intermediaries, property (non-property) benefits and advantages for himself or third parties, as well as bribery of these persons by providing benefits and advantages;

13) legalization (laundering) of criminally obtained income is the involvement in the legal circulation of money and (or) other criminally obtained property through transactions in the form of conversion or transfer of property representing proceeds from criminal offenses, or the possession and use of such property, concealment or concealment of its true nature, source, location, the method of disposal, transfer, rights to property or its accessories, if it is known that such property represents proceeds from criminal offenses, as well as mediation in the legalization of money and (or) other property obtained by criminal means;

14) A person performing managerial functions in a Company is a person who permanently, temporarily, or by special authority performs organizational, administrative, or economic functions in the Company;

15) fraud is the theft of someone else's property or the acquisition of the right to someone else's property through deception or abuse of trust;

16) fraudulent actions are intentional actions or omissions of employees of the Company, as well as other individuals and (or) legal entities in order to obtain benefits at the expense of the Company and (or) cause it material and (or) non-material damage;

17) organizational and administrative functions are the right granted in accordance with the procedure established by the laws of the Republic of Kazakhstan and internal regulatory documents of the Company to issue orders and orders binding on the Company's employees, as well as to apply incentive measures and disciplinary penalties against the Company's employees;

18) facilitation payments are payments or other benefits that are not provided for by the current legislation or internal regulatory documents of the Company, and which are offered in order to speed up or simplify the implementation of an administrative procedure (action) to which the payer is entitled in accordance with the legislation of the Republic of Kazakhstan, contract or other grounds;

19) Corruption prevention is the activity of persons performing managerial functions in the Company, employees of the Company, to study, identify, limit and eliminate the causes and conditions conducive to the commission of corruption offenses by developing and implementing a system of preventive measures;

20) Anti-corruption is the activity of persons performing managerial functions in the Company, employees of the Company, within the limits of their powers, to prevent corruption, including the formation of an anti-corruption culture in the Company, identify and eliminate the 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;

21) employee – an individual who is in an employment relationship with the Company and directly performs work under an employment contract, with the exception of persons performing managerial functions in the Company;

22) kindred - full and half-siblings, parents and children of the spouse;

23) The authorized anti-corruption body is a state body responsible for the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption, as well as the prevention, detection, suppression, disclosure and investigation of corruption offenses, and its territorial divisions.

## **Chapter 2. Anti-corruption goals, principles, and objectives**

4. The aim of the Policy is to strengthen measures to prevent and detect corruption, as well as to create an atmosphere of intolerance towards corruption in Society.

5. The goal of combating corruption is achieved by solving the following tasks:

1) the formation of an atmosphere of intolerance to corruption in Society and respect for the principles of honesty and transparency in the performance of labor and (or) official duties;

2) identification of conditions and causes contributing to the commission of corruption offenses and elimination of their consequences;

3) creation of effective mechanisms, procedures, control and other measures aimed at combating corruption and minimizing the risks of involvement of the Company, persons performing managerial functions and employees of the Company in corruption and other illegal activities;

4) ensuring the application of liability measures for corruption offenses and other illegal actions (inaction).

6. The Company is guided by the following anti-corruption principles in the framework of its activities:

1) the principle of zero tolerance (non-acceptance of corruption in any form and manifestations) is a complete prohibition for persons performing managerial functions and employees of the Company, directly or indirectly, personally or through any kind of mediation, to participate in corruption and other illegal actions;

2) the commitment of the management and the establishment of a "tone from above" – the Board of Directors of the Company plays a key role in creating a culture of intolerance to corruption. The members of the Board of Directors and the Management Board of the Company openly and constantly declare their irreconcilable attitude towards any form of corruption and at all levels, demonstrate, observe and implement this principle by personal example;

3) the principle of due diligence – The Company exercises due diligence when establishing/continuing business relationships with counterparties, candidates for vacant positions in the Company or other third parties, carrying out timely verification of their trustworthiness and absence of conflict of interests;

4) the principle of corruption prevention – The Company takes preventive measures in advance to prevent corruption, that is, the introduction of elements of corporate culture, organizational structure, rules and procedures aimed primarily at identifying corruption risks and minimizing them;

5) effectiveness of anti-corruption procedures - The Company implements transparent, clear, feasible anti-corruption procedures that ensure their ease of implementation and achieve meaningful results. The Company evaluates the effectiveness of existing control procedures and improves them in case of inefficiency;

6) the principle of the inevitability of punishment – The Company declares an irreconcilable attitude towards any forms and manifestations of corruption and fraud at all levels of corporate governance. The perpetrators are held accountable regardless of their position and work experience in the Company and other relationships with them in accordance with the procedure established by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company;

7) monitoring and control – The Compliance Service monitors the state of corruption risks, monitors compliance with the implemented procedures for preventing and combating corruption and fraud, and their effectiveness;

8) involvement in combating corruption - The Company informs persons performing managerial functions and employees of the Company about the provisions of anti-corruption legislation and welcomes their active participation in the formation and implementation of anti-corruption standards and procedures, the development of an anti-corruption culture, as well as the adoption by persons performing managerial functions in the Company and the head of the

structural unit authorized to make decisions on the organization and procurement in the Company, provided for by the legislation of the Republic of Kazakhstan anti-corruption restrictions;

9) prevention of conflicts of interest – persons performing managerial functions and employees of the Company should not directly or indirectly influence decision-making in the Company in the event of a conflict of interest with the interests of the Company;

10) ensuring guarantees of protection and non-harassment of the Company's employees and other persons who assist in combating corruption in the Company.

### **Chapter 3. Types of corruption offenses**

7. The Company provides for a complete ban on the commission of corruption crimes/offenses, fraudulent activities, including:

1) giving or receiving a bribe, as well as mediation in the transfer of a bribe, including payments for simplification of formal procedures (facilitation payments);

2) obtaining or extracting other property benefits and (or) advantages in accordance with anti-corruption legislation;

3) deliberate misrepresentation of financial statements;

4) misuse and (or) appropriation and (or) theft of the Company's assets: theft of funds, misuse of funds, theft of fixed assets, inventory;

5) actions of a corrupt nature, abuse of official powers and abuse of official powers: using one's official powers and related opportunities to obtain property benefits, violations in the procurement of goods, works, and services, expressed in forgery and (or) forgery of documents, deliberate overestimation or underestimation of prices for goods, works, and services for receiving monetary rewards, gifts or other benefits, intentionally destroying information relevant to the Company's activities, including information contained in information systems, or changing information in them, implementing programs to ensure unauthorized access to information from third parties or for personal purposes;

6) actions performed by counterparties for the purpose of obtaining additional profits, other actions that may result in damage to the Company and (or) the state;

7) the provision by counterparties of knowingly false, altered or distorted information for the purpose of deception or deception and profit at the expense of the Company;

8) actions aimed at unauthorized intrusion into the Company's information systems or the seizure of confidential information in order to make a profit and (or) damage the Company's activities and (or) negatively affect the Company's reputation;

9) legalization (laundering) of criminally obtained income, insider transactions, as well as other types of corruption offenses provided for by the current legislation of the Republic of Kazakhstan.

### **Chapter 4. Anti-corruption measures**

8. Anti-corruption measures in Society include:

1) thematic anti-corruption monitoring;

2) internal analysis of corruption risks;

3) building an anti-corruption culture and training;

4) approval of anti-corruption standards, instructions on preventing and combating corruption and fraud, and procedures for preventing or minimizing the risks of money laundering;

5) adoption of anti-corruption restrictions by persons performing managerial functions in the Company and the head of the structural unit authorized to make decisions on the organization and conduct of procurement;

6) formation and observance of anti-corruption standards;

7) financial control measures;

8) conflict of interest prevention and resolution;

9) reporting to the authorized anti-corruption body on the work done to combat corruption in the Company within the time limits and in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan on combating corruption;

10) coordination with the Company's counterparties of issues related to the latter's compliance with the provisions of this Policy, the development by counterparties of their own anti-corruption procedures, the inclusion of anti-corruption clauses in the text of agreements and contracts concluded with counterparties, as well as other measures provided for by the current legislation of the Republic of Kazakhstan;

11) other measures provided for by the legislation of the Republic of Kazakhstan on combating corruption and internal regulatory documents of the Company.

9. Procedures for preventing or minimizing the risks of the legalization (laundering) of proceeds from crime in the Company's activities are regulated by the Company's Internal Control Rules for Countering the Legalization (Laundering) of Proceeds from Crime, the Financing of terrorism and the Financing of the proliferation of weapons of Mass destruction, approved by the decision of the Board of Directors of the Company.

## **Chapter 5. Measures to prevent corruption and fraud**

10. Prevention and combating of corruption and fraud are carried out in accordance with the procedure provided for by this Policy and relevant internal regulatory documents of the Company, including through the application of the following measures on an ongoing basis:

1) formation of an anti-corruption culture by conducting training events for the Company's employees to explain the norms of the anti-corruption legislation of the Republic of Kazakhstan, as well as on the prevention and combating of corruption and fraud;

2) timely forecasting and minimizing the risks of involving the Company's employees in corrupt and (or) fraudulent activities;

3) prevention, detection and suppression of all forms and manifestations of corruption and fraud;

4) development, implementation and application of internal regulatory documents, organizational measures and procedures to prevent and combat corruption and fraud;

5) control over compliance by the Company's employees and persons performing managerial functions in the Company with the restrictions, prohibitions and obligations stipulated by this Policy, the Code of Business Ethics and other internal regulatory documents of the Company;

6) ongoing monitoring of the Company's business processes, analysis of potential vulnerabilities, preparation of recommendations and proposals for the organization and adoption of adequate measures to minimize the risks of corruption and fraudulent activities;

7) conducting an audit of the Company's counterparties to establish business reputation and identify conflicts of interest;

8) accounting of affiliated persons of the Company in order to resolve a potential conflict of interests;

9) conducting a compliance examination of draft internal regulatory documents of the Company for the presence of corruption-related norms in them, and, if necessary, the application of appropriate preventive measures;

10) ensuring information security in the Company in order to prevent unauthorized access to confidential information;

11) reviewing reports from employees of the Company, other individuals and (or) legal entities about possible corruption on the part of persons performing managerial functions and employees of the Company and providing feedback on them;

12) conducting official investigations on reports of illegal actions (omissions) on the part of persons performing managerial functions or employees of the Company who have signs of a



corruption offense or fraud in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company;

13) prevention of cases of creating artificial business needs and overstating planned budget expenditures of the Company;

14) prevention and resolution of conflicts of interest, establishment of principles for disclosure of information about conflicts of interest, decision-making mechanisms and standards of conduct for employees of the Company in the event of a conflict of interest;

15) monitoring of publications in the mass media about the activities of the Company and persons performing managerial functions in the Company;

16) interaction with law enforcement agencies of the Republic of Kazakhstan in order to coordinate their activities on combating corruption and fraud, prevention and prevention of offenses;

17) reporting to the Board of Directors and the Management Board of the Company on the state of the anti-corruption and fraud system in the Company, as well as on the results of the work done;

18) other measures to prevent, prevent or counteract the risks of corruption and fraud that do not contradict the legislation of the Republic of Kazakhstan.

## **Chapter 6. Anti-corruption monitoring**

11. The purpose of anti-corruption monitoring is to evaluate law enforcement practices on anti-corruption issues in the Company's business processes.

12. The objective of thematic anti-corruption monitoring is to study problematic issues that contribute to the manifestations of corruption in the business processes of Society.

13. The subject of anti-corruption monitoring is information related to the effectiveness of anti-corruption policy in Society, the state of law enforcement practice in the field of combating corruption, as well as perception and assessment of the level of corruption in Society.

14. The sources for anti-corruption monitoring are:

- 1) data from legal statistics authorities;
- 2) appeals of individuals and legal entities on anti-corruption issues;
- 3) information from non-governmental and international organizations;
- 4) data from opinion polls on anti-corruption issues;
- 5) publications in the mass media;

6) other sources of information not prohibited by the legislation of the Republic of Kazakhstan.

15. Thematic anti-corruption monitoring is carried out by collecting, processing, summarizing, analyzing and evaluating the information specified in paragraph 14 of this Policy.

16. Thematic anti-corruption monitoring is conducted by the Compliance Service on a quarterly basis in the following order:

1) collection and synthesis of information from open sources provided for in paragraph 14 of this Policy;

2) study and analysis of the collected information;

3) identification of problematic issues contributing to the manifestations of corruption in a particular area of the Company's activities;

4) the formation of the result of thematic anti-corruption monitoring with the development of proposals to improve the efficiency of the Company.

17. Based on the results of the thematic anti-corruption monitoring, a decision is being formed that includes:

1) assessment of the effectiveness of anti-corruption measures and proposals to improve the effectiveness of the Company's anti-corruption activities;

2) recommendations on conducting an internal analysis of corruption risks in the Company's activities.

18. The results of the thematic anti-corruption monitoring are drawn up no later than the fifth business day of the month following the reporting quarter, in accordance with Appendix 4 to this Policy, and sent to the authorized anti-corruption body and (or) the Anti-Corruption Compliance Service of the Sole Shareholder of the Company for generalization.

19. The Compliance Service shall submit the results of the thematic anti-corruption monitoring for consideration by the Management Board and the Board of Directors of the Company no later than the 30th (thirtieth) day of the month following the reporting quarter.

20. The results of the thematic anti-corruption monitoring can be reviewed at meetings of the Public Council at least once a year.

21. The results of thematic anti-corruption monitoring can serve as a basis for conducting an internal analysis of corruption risks, as well as for improving measures aimed at creating an anti-corruption culture in Society.

## **Chapter 7. Internal analysis of corruption risks**

22. The internal analysis of corruption risks is based on the principles of:

- 1) objectivity;
- 2) reliability;
- 3) transparency
- 4) comprehensiveness.

23. The decision to conduct an internal analysis of corruption risks is made based on the results of an internal or external audit, anti-corruption monitoring, instructions from the Sole Shareholder of the Company or authorized state bodies of the Republic of Kazakhstan, as well as on the results of a compliance risk assessment conducted in accordance with the procedure established by the Company's internal regulatory documents.

24. The object of internal analysis of corruption risks is the activity of one or more structural divisions of the Company (hereinafter referred to as the object of analysis).

The procedure for determining the object of analysis is given in Appendix 5 to this Policy.

25. Internal analysis of corruption risks is carried out at least 1 (one) time per year within the time limits stipulated by the Work Plan (compliance program) Compliance service approved by the Board of Directors of the Company.

26. If the authorized anti-corruption body conducts an external analysis of corruption risks in the Company's activities, an internal analysis of corruption risks is carried out after 1 (one) year from the date of its completion.

27. In cases of systemic manifestations of corruption, by decision of the Chairman of the Management Board of the Company, an internal analysis of corruption risks may be conducted before or after the deadlines specified in paragraphs 25 and 26 of this Policy.

28. The internal analysis of corruption risks is carried out by the Compliance Service independently and/or by a working group created on the basis of an order from the Chairman of the Management Board of the Company or a person acting in his place (hereinafter referred to as the Order). If necessary, the Head of the Compliance Service, in agreement with the Chairman of the Management Board of the Company or a person acting in his place, may involve employees of other disinterested structural divisions of the Company.

29. The internal analysis of corruption risks is carried out within a period not exceeding 30 (thirty) business days, if necessary, the specified period is extended for a period not exceeding 15 (fifteen) business days based on the order of the Chairman of the Management Board of the Company or a person acting in his place.

In order to comply with the deadline set by this paragraph, it is recommended to develop a work plan for conducting an internal analysis of corruption risks in accordance with Annex 6 to this Policy.

The action plan for conducting an internal analysis of corruption risks provides for the identification of types of work, deadlines for their execution and responsible persons.

30. The order to conduct an internal analysis of corruption risks should include the following information:

- 1) the name of the object of analysis, whose activities are subject to internal analysis of corruption risks;
- 2) direction of internal analysis of corruption risks;
- 3) about the structural unit or the staff of the working group responsible for conducting an internal analysis of corruption risks;
- 4) the period of internal analysis of corruption risks;
- 5) the deadline for conducting an internal analysis of corruption risks;
- 6) a person performing managerial functions in the Company, who is entrusted with the management, coordination and responsibility for conducting an internal analysis of corruption risks and work results.

31. The internal analysis of corruption risks is carried out in the following areas::

- 1) identification of corruption risks in the Company's internal regulatory documents affecting the activities of the object of analysis;
- 2) identification of corruption risks in the organizational and managerial activities of the object of analysis.

32. The organizational and managerial activities of the object of analysis include the following issues:

- 1) personnel management, including the identification of positions subject to corruption risks;
- 2) conflict of interest resolution;
- 3) the development and distribution of budgetary and financial resources;
- 4) conclusion of contracts with individuals and legal entities;
- 5) development and operation of information systems;
- 6) other issues arising from the organizational and managerial activities of the object of analysis.

33. The internal analysis of corruption risks includes the following steps:

- 1) collection and analysis of information about the object of analysis in accordance with the directions provided for in the Order;
- 2) preparation of an analytical report;
- 3) identification of positions subject to corruption risks, with the formation of their list;
- 4) taking measures to eliminate corruption risks in accordance with the approved action plan to eliminate the causes and conditions conducive to the commission of corruption offenses identified by the results of an internal analysis of corruption risks in accordance with Annex 9 to this Policy.

34. The sources of information for conducting an internal analysis of corruption risks are:

- 1) internal regulatory documents of the Company, regulatory legal acts of the Republic of Kazakhstan regulating the activities of the object of analysis;
- 2) departmental statistical reporting on the activities of the object of analysis;
- 3) data from information systems of government and law enforcement agencies on the activities of the object of analysis;
- 4) the results of inspections previously conducted by the state bodies of the Republic of Kazakhstan in relation to the object of analysis;
- 5) the results of control measures and audits, including those conducted by the Company's Internal Audit Service;
- 6) compliance risk assessment results;
- 7) results of anti-corruption monitoring;
- 8) publications in the media;
- 9) appeals of individuals and legal entities regarding the object of analysis;
- 10) information on the identification and prosecution of employees of the object of analysis for committing corruption offenses;

- 11) the results of an earlier internal analysis of corruption risks;
- 12) the results of the survey (interview) of the employees of the object of analysis;
- 13) other information, the provision of which is not prohibited by the legislation of the Republic of Kazakhstan.

35. Employees of the analysis facility provide the person authorized to conduct an internal analysis of corruption risks or members of the working group with information from the sources provided for in paragraph 34 of this Policy, explain the practice of applying the legislation of the Republic of Kazakhstan affecting the activities of the analysis facility, report on existing corruption risks, and, if necessary, develop proposals to improve legislation, law enforcement practice or internal regulatory documents of the Company in the field of anti-corruption.

36. The responsibility for the timely and complete presentation of the information specified in paragraph 34 of this Policy lies with the head of the analysis facility.

37. Based on the results of the internal analysis of corruption risks, an analytical report is prepared in accordance with Annex 7 to this Policy, containing:

- 1) information about identified corruption risks;
- 2) recommendations for their elimination;
- 3) the list of positions subject to corruption risks, determined based on the results of an internal analysis of corruption risks in accordance with Annex 8 to this Policy.

38. Upon completion of the internal analysis of corruption risks, the Compliance service sends an analytical report for approval to the head of the analysis facility, in whose activities an internal analysis of corruption risks has been conducted, through the Company's electronic document management system.

39. The head of the analysis facility approves the analytical report no later than 3 (three) business days from the date of its receipt.

40. The analytical report is signed by the Chairman of the Management Board of the Company or a person acting in his place no later than 10 (ten) business days from the date of completion of the internal analysis of corruption risks.

41. After signing the analytical certificate by the Chairman of the Management Board of the Company or a person acting in his place, the subject of analysis develops an action plan to eliminate the causes and conditions conducive to the commission of corruption offenses identified by the results of an internal analysis of corruption risks (hereinafter referred to as the action plan) in accordance with Appendix 9 to this Policy and submits it to the Compliance Service via electronic document management. coordination regarding the compliance of the recommendations issued and the adequacy of the planned activities. The time limit for developing and approving an action plan with the Compliance Service should not exceed 3 (three) business days. The action plan agreed with the Compliance Service must be submitted by the subject of the analysis for approval to the Chairman of the Management Board of the Company or the person replacing him.

42. The measures should be specific and sufficient to eliminate identified corruption risks. The deadlines for the implementation of measures should be reasonable and not exceed 1 (one) year. The deadlines for the implementation of measures related to the development of the information system are determined based on the Company's budget planning procedures.

43. The action plan is approved by the Chairman of the Management Board of the Company or a person acting in his place no later than 10 (ten) business days from the date of signing the analytical report.

44. The analytical report and the action plan are posted on the Company's Internet resource within 3 (three) business days from the date of approval of the action plan, taking into account the secrecy regime, compliance with the requirements for the protection of official, commercial or other secrets protected by the laws of the Republic of Kazakhstan.

45. The results of the internal analysis of corruption risks are reviewed at meetings of the Board of Directors and the Management Board of the Company as part of the quarterly reports of the Compliance Service.

46. The subject of the analysis, in whose activities an internal analysis of corruption risks has been conducted, quarterly from the date of signing the analytical report, no later than the 5th (fifth) day of the month following the reporting quarter, sends to the Compliance Service information on the progress of the recommendations and supporting documents in accordance with Appendix 10 to this Policy.

47. The Compliance Service, within 5 (five) business days from the date of receipt of information on the implementation of recommendations and supporting documents, must review them and generate the results of monitoring the implementation of recommendations in accordance with appendix 12 to this Policy.

48. Based on the results of reviewing the information of the object of analysis, the status of the implementation of the recommendation is determined.

49. The recommendation is considered fully implemented if the identified corruption risk is eliminated by executing the event in accordance with the completion form specified in the action plan.

50. The recommendation is partially implemented if the identified corruption risk is not eliminated or minimized to an insignificant extent due to the incomplete execution of the event in accordance with the completion form specified in the action plan.

51. The recommendation is considered unfulfilled if the identified corruption risk is not eliminated or minimized due to the failure to take measures to implement the action plan item.

52. A recommendation is deemed to be no longer relevant if it is impossible or impractical to carry out an event for objective reasons (changes in legislation, reorganization or abolition of a legal entity, transfer of functions, etc.).

53. The results of monitoring the implementation of recommendations are brought to the attention of the Board of Directors and the Management Board of the Company as part of the quarterly reports of the Compliance Service, and are also sent to the subject of analysis.

54. In case of non-fulfillment or incomplete fulfillment of recommendations by the object of analysis, the Compliance Service submits relevant information to the head of the Company, who oversees the activities of the object of analysis, in order to take response measures.

55. In case of non-fulfillment or incomplete fulfillment by the subject of the analysis of recommendations after one year from the date of approval of the action plan for objective reasons, the Compliance Service continues to monitor the implementation of recommendations until their final execution.

56. The Compliance Service, within 1 (one) year from the date of signing the analytical certificate, monitors the elimination of the causes and conditions conducive to the commission of corruption offenses by preparing information on the implementation of recommendations made based on the results of an internal analysis of corruption risks in accordance with Annex 11 to this Policy.

57. Information on the implementation of recommendations made based on the results of an internal analysis of corruption risks is posted on the Company's Internet resource at least once every 6 (six) months, taking into account the secrecy regime, compliance with the requirements for the protection of official, commercial or other secrets protected by the law of the Republic of Kazakhstan.

58. The results of the internal analysis of corruption risks and monitoring of the implementation of recommendations to eliminate identified corruption risks may be reviewed at meetings of the Public Council of the Company at least once a year.

## **Chapter 8. Anti-corruption standards**

59. Anti-corruption standards are a system of recommendations established for the Company's activities aimed at preventing corruption.

60. In order to achieve an atmosphere of intolerance to any manifestations of corruption in the Company, the Company's employees annually confirm, in accordance with the form

provided for in appendix 1 to this Policy, that they are familiar with the Company's anti-corruption standards.

## **Chapter 9. Anti-corruption restrictions**

61. In order to prevent persons performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of procurement, from committing actions that may lead to them using their powers in personal, group and other non-official interests, these persons, taking into account the specifics established by articles 13, 14, 14-1 and 15 of the Law of the Republic of Kazakhstan on Combating Corruption, assume anti-corruption restrictions on:

- 1) 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 relatives;
- 3) the 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;
- 4) acceptance of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions fall within the official powers of the persons specified in the first paragraph of this paragraph, or these persons, by virtue of their official position, may contribute to such actions (inaction);
- 5) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan;
- 6) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan "On Gambling", as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of networks telecommunications, including the Internet.

The consent of persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, to adopt anti-corruption restrictions is recorded by the structural unit responsible for human resource management in the Company in accordance with Appendix 3 to this Policy no later than 3 (three) business days from the date of their adoption. taking office.

Failure to comply with anti-corruption restrictions by persons performing managerial functions in the Company, as well as by the head of a structural unit authorized to make decisions on the organization and conduct of procurement, entails refusal to accept a position or dismissal (dismissal from office, termination of powers), their non-compliance is the basis for dismissal (dismissal from office, termination of powers).

62. Family members of a person <sup>1</sup>performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of purchases, are not entitled to receive financial remuneration, gifts or services provided for their actions (inaction) in favor of persons who provided financial remuneration, gifts or services, if such actions (inaction) are included in their official powers or, by virtue of their official position, may contribute to such actions (inaction).

63. Persons performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of procurement, are 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 legislation of the Republic of Kazakhstan, to promote the satisfaction of the

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<sup>1</sup> Family members include a spouse, parents, children, including adults, and persons who are dependent and permanently residing with them.

material interests of organizations or individuals through the misuse of their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activity, with the exception of the acquisition and (or) sale of shares of open and interval mutual funds, bonds on the organized securities market, shares of commercial organizations (common shares in the amount not exceeding 5 (five) percent of the total number of voting shares of organizations) on the organized securities market;

3) engage in other paid activities other than teaching, scientific and other creative activities.

64. Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, have the right to lease (lease) housing belonging to them by right of ownership, and receive income from such rental.

65. Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, are required to transfer their property to trust management for the duration of these functions in accordance with the procedure established by the laws of the Republic of Kazakhstan, the use of which entails the receipt of income, with the exception of money, bonds, shares of open and interval mutual funds legally owned by these persons, as well as property transferred to property lease.

66. The contract for the trust management of property is subject to notarization.

67. In the case of the acquisition of shares (stakes in the authorized capital) of commercial organizations and other property, the use of which entails income, with the exception of bonds, shares of open and interval mutual funds, persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of purchases are required to transfer they are placed in trust management within 30 (thirty) calendar days from the date of acquisition in accordance with the procedure established by the laws of the Republic of Kazakhstan.

Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, are required to submit to the structural unit responsible for human resource management in the Company a notarized copy of the notarized contract for the trust management of property within 10 (ten) business days after the notarization of the contract.

68. Failure by persons performing managerial functions in the Company, as well as by the head of a structural unit authorized to make decisions on the organization and conduct of purchases, to fulfill the obligations provided for in paragraphs 65 and 67 of this Policy is the basis for termination of their respective powers.

69. Persons performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of procurement, may not hold positions directly subordinate to positions held by their close relatives, spouse and (or) relatives, as well as have close relatives, spouse directly subordinate to them.spouse) and (or) relatives.

Persons performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of procurement, are prohibited from holding positions with their close relatives, spouse and (or) relatives in the same collegial body (Board of Directors, Management Board) Societies.

Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, are required to notify the Company's management in writing about close relatives, spouse and (or) associates working in this Company in accordance with the procedure provided for in the Company's internal regulatory document on the settlement of corporate conflicts and conflict interests.

Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, who

violate the requirements of this paragraph of the Policy, if they do not voluntarily eliminate it within 3 (three) months from the moment of detection of the specified violation, are subject to transfer to positions that exclude such subordination/collaboration in one collegial body (Board of Directors, Management Board) The Company, and if such a transfer is not possible, one of these employees is subject to dismissal from office or other dismissal from these functions.

70. Persons performing managerial functions in the Company are prohibited from opening and having accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, and from storing cash and valuables in foreign banks located outside the Republic of Kazakhstan.

Persons performing managerial functions in the Company are required to close accounts (deposits) in foreign banks located outside the Republic of Kazakhstan and (or) stop storing cash and valuables in foreign banks located outside the Republic of Kazakhstan within 6 (six) months from the date of taking office.

71. The Compliance Service monitors compliance by persons performing managerial functions in the Company, as well as by the head of the structural unit authorized to make decisions on the organization and conduct of procurement of the adopted anti-corruption restrictions.

72. Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement and the structural unit responsible for human resource management in the Company, shall inform the Compliance Service about all cases that violate or may violate the anti-corruption restrictions provided for in this Policy no later than 2 (two) working days from the day when they became aware of such cases.

73. Upon detection of violations of anti-corruption restrictions, the Compliance Service, no later than 2 (two) business days from the date of their discovery, shall bring the relevant information to the attention of the Chairman of the Management Board of the Company and the structural unit responsible for human resource management in the Company, indicating the need to eliminate such violations within the time limits provided for by this Policy and other internal documents. regulatory documents of the Company.

Information on the identified violations of anti-corruption restrictions and the measures taken in this regard is subject to mandatory inclusion in the quarterly report on the work carried out by the Compliance Service, which is provided to the Audit Committee and the Board of Directors of the Company.

## **Chapter 10. Conflict of interest prevention and resolution**

74. Persons performing managerial functions in the Company, as well as the head of a structural unit authorized to make decisions on the organization and conduct of procurement, are prohibited from exercising official duties if there is a conflict of interest.

Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, are required to take measures to prevent and resolve conflicts of interest.

Persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement, are obliged to immediately notify the immediate supervisor (if any) or the management of the Company, the Compliance Service in writing about a conflict of interest or the possibility of its occurrence as soon as they become aware of it, in accordance with the procedure established by the Company's internal regulatory document on corporate conflict resolution and conflict of interests.

The immediate supervisor (if any) or the Company's management, upon requests from persons performing managerial functions in the Company, as well as the head of the structural unit authorized to make decisions on the organization and conduct of procurement or upon receiving information from other sources, must take timely action in accordance with the procedure



established by the Company's internal regulatory document on corporate conflict resolution and conflict of interest interests.

## **Chapter 11. Formation of an anti-corruption culture**

75. The formation of an anti-corruption culture is the duty of every manager and employee of the Company and is carried out by the Compliance Service together with the structural unit responsible for human resource management in the Company through their regular training in the basic requirements of the Policy and its application in practice, and a set of information and organizational measures.

## **Chapter 12. Financial control measures**

76. The declaration of assets and liabilities is submitted by candidates for a position related to the performance of managerial functions in the Company or the head of a structural unit authorized to make decisions on the organization and conduct of procurement, as well as their spouses, prior to the issuance of an official (body) act Of the Company having the right to appoint to the position, on appointment to the position (as of the first day of the month of submission of the declaration).

77. Income and property declarations are submitted by persons performing managerial functions in the Company and employees of the Company, as well as their spouses.

78. Declarations of assets and liabilities, income and property are drawn up in accordance with the tax legislation of the Republic of Kazakhstan and are submitted in the form, in the manner and within the time limits provided for by the tax legislation of the Republic of Kazakhstan.

79. In the case of acquisition of property during the reporting calendar year, as defined by the tax legislation of the Republic of Kazakhstan, persons performing managerial functions in the Company and the head of the structural unit authorized to make decisions on the organization and conduct of purchases, as well as their spouses, in the income and property declaration reflect information on the sources of coverage for the acquisition of the specified property.

80. Failure by candidates for a position related to the performance of managerial functions in the Company or by the head of a structural unit authorized to make decisions on the organization and conduct of procurement, as well as by their spouses, to submit declarations of assets and obligations or to submit incomplete, unreliable information in such declarations, if the act does not contain signs of a criminal offense, is grounds for refusal. in giving candidates the appropriate powers.

Failure by persons performing managerial functions in the Company, the head of a structural unit authorized to make decisions on the organization and conduct of procurement, as well as their spouses, to submit income and property declarations or to submit incomplete, unreliable information in such declarations, if the act does not contain signs of a criminal offense, entails liability provided for by the Code of the Republic of Kazakhstan on administrative offenses.

81. The structural subdivision responsible for human resource management in the Company shall, no later than December 31 (thirty-first) of the year following the reporting calendar year, post on the Company's corporate Internet resource information reflected in the declarations of persons performing managerial functions in the Company and their spouses.

Persons performing managerial functions in the Company are required to provide the necessary information to the structural unit responsible for human resource management in the Company by December 1 (first) of the year following the reporting calendar year.

The list of information to be published is determined in accordance with the legislation of the Republic of Kazakhstan.

82. The Compliance Service monitors and controls the timely provision of declarations of assets and liabilities, income and property by persons performing managerial functions in the Company and employees of the Company, as well as their spouses.

### **Chapter 13. Giving, accepting gifts, and other services (tokens of attention)**

83. In accordance with the legislation of the Republic of Kazakhstan and the Code of Business Ethics, the Company prohibits persons performing managerial functions in the Company and employees of the Company, as well as their close relatives, spouses and relatives, from receiving financial remuneration, gifts or services provided for actions (inaction). these persons in favor of persons who have provided financial remuneration, gifts or services, if such actions (inaction) fall within the official powers of these persons or they, by virtue of their official position, may contribute to such actions (inaction).

84. A gift is any value in tangible or intangible form for which there is no obligation to pay the usual price, including money, securities and other property, benefits and services of a property nature (work, services, payment for entertainment, recreation, transportation costs, loans, discounts, provision of property, including housing, charitable contributions, donations, etc.) received or transferred by a person performing managerial functions in the Company or an employee of the Company using his official powers.

85. Gifts and money received without the knowledge of persons performing managerial functions and employees of the Company and (or) their family members are subject to gratuitous transfer /transfer to the relevant authorized state body in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan on combating corruption.

86. Gifts are not used as a means of forming expectations in order to unlawfully obtain or extract property and non-property benefits and advantages.

87. The Company recognizes gifts (souvenirs) to counterparties as ethical during official meetings and representative expenses, if this is justified by the goals of business cooperation, subject to compliance with the requirements of the legislation of the Republic of Kazakhstan. The Company strongly encourages an atmosphere of honesty and transparency regarding business gifts and business hospitality expenses.

88. The implementation of representative expenses, including for the Company's business hospitality with third parties, must meet the following criteria:

1) fully comply with the norms of the legislation of the Republic of Kazakhstan, the Code of Business Ethics and internal regulatory documents of the Company;

2) be reasonably reasonable, proportionate, and not considered luxury items;

3) not to represent a hidden reward for a service, action, omission, connivance, patronage, granting rights, making a specific decision on a transaction, agreement, license, permit, etc., or an attempt to influence the recipient for another illegal or unethical purpose;

4) the display of hospitality is not intended and cannot be perceived as intended to influence or persuade a person to act in a certain way, or to reward this person for performing his role or function;

5) not to create reputational risk for the Company in case of disclosure of information about gifts or representative expenses;

6) the display of hospitality is appropriate and does not exceed the limits provided for in this Policy, and does not violate the gift policy of the relevant third-party organization.

89. Any display of hospitality must be carried out in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulatory documents.

90. It is not allowed to offer hospitality tokens and gifts to civil servants, officials of quasi-public sector entities and their family members who have assumed anti-corruption restrictions in

accordance with the Law of the Republic of Kazakhstan on Combating Corruption. It is also not allowed to offer or give gifts if it is known that accepting a gift is unacceptable for the recipient.

91. All expenses for business gifts and business hospitality, as well as advertising expenses, must be carried out strictly in accordance with the approved budget of the Company. Budget requests from administrators of budget items must be reviewed and agreed upon in advance by the responsible structural divisions and the Company's management in accordance with the procedure provided for in the Company's internal regulatory document on budgeting.

92. If there are doubts about the compliance of a business gift or event with the requirements of this Policy, the Code of Business Ethics or other internal regulatory documents of the Company, the employee should consult with the Company's direct supervisor or Compliance Service on this issue.

93. An employee who receives a gift in the form of cash or their equivalents without his knowledge and (or) to his family members is obliged to inform in writing the head of his department or the head in charge of the structural unit (if the employee is the head of the department) and the Compliance Service, and no later than two weeks after their It is necessary to make a refund by transferring it to the republican budget with an explanation to the relevant state revenue authority about the circumstances of receipt of such funds.

94. An employee who receives a gift without his knowledge and /or his family members must inform in writing the head of his department or the head in charge of the structural unit (if the employee is the head of the department) and the Compliance Service, and no later than 7 (seven) calendar days from the date of receipt of the gift or from the date of when he became aware of the receipt of the gift, to make a gratuitous transfer to the authorized body for the management of state property, and the services rendered to the specified persons under the same circumstances must be paid for by them by transferring money to the republican budget within 7 (seven) calendar days from the date of the provision of the service or from the day when they became aware of the provision services.

95. The actions specified in this chapter must be recorded in the Register of Gifts and Acts of Hospitality, which is maintained by the Compliance Service in accordance with Appendix 13 to this Policy.

The journal is kept on paper, laced and numbered in order to avoid adjustments, blots and erasures.

## **Chapter 14. Procedure for reviewing reports of corruption**

96. The Company ensures the operation of the Senim Hotline channel, designed to inform employees of the Company and other individuals and (or) legal entities about compliance violations, including:

violations of the provisions of the Company's internal regulatory documents in the field of combating corruption and fraud;

suspicious, intentions and (or) facts of corruption and fraudulent actions by employees of the Company and persons performing managerial functions in the Company;

inaction of persons performing managerial functions in the Company, employees of the Company, contributing to the commission of corrupt acts;

the facts of appeals to persons performing managerial functions in the Company, employees of the Company of any persons in order to incite them to commit corruption offenses;

possible fraudulent and other illegal actions committed by any employee or person performing managerial functions in the Company, or by an employee or representative of the Company's counterparty in relation to the Company.

97. The "Senim Hotline" includes:

1) the e-mail of the Senim Hotline, indicated on the Company's corporate Internet resource;

2) the telephone number of the Senim Hotline listed on the Company's corporate Internet resource;

3) e-mails of employees of the Compliance Service indicated on the corporate Internet resource of the Company.

98. The Company guarantees the implementation of the following basic principles of the Senim Hotline:

confidentiality;

anonymity;

accessibility (the ability to send and receive messages without hindrance);

continuity of work (receiving requests 24/7);

efficiency (prompt primary analysis and registration of messages).

99. The Senim hotline is open around the clock, seven days a week, while phone calls are received by employees of the Compliance Service on weekdays from 09.00 to 18.30 hours.

Messages received by the Senim Hotline after the specified time, including holidays / weekends, are sent to the answering machine with the possibility of recording. Messages received outside of business hours are processed on the first business day after receiving the message.

100. Persons who have information about a corruption offense being prepared, committed, or committed, or the conditions for a person performing managerial functions in the Company or an employee of the Company to commit a corruption offense, or when an employee of the Company receives information specified in paragraph 96 of the Policy, are required to inform the Chairman of the Management Board of the Company (the person replacing him) or the Compliance Service of their suspicions about to any of the communication channels of the Senim Hotline.

101. The Chairman of the Management Board of the Company (the person replacing him) is obliged to take measures, upon notification, about a possible corruption offense, illegal actions of a person performing managerial functions in the Company or an employee of the Company by sending a message to the Compliance Service for consideration and taking measures to verify the arguments set out in the message.

102. For each reasonable suspicion of possible cases of corruption offenses, illegal actions of a person performing managerial functions in the Company or an employee of the Company, internal investigations will be conducted in accordance with the procedure provided for in the Company's internal regulatory document on the prevention and combating of corruption and fraud.

103. If the results of an internal investigation reveal signs or facts of a corruption offense, the completion of the internal investigation is considered to be the adoption of corrective measures and improvement of internal procedures based on the principle of zero tolerance for any manifestations of corruption, including termination of employment and transfer of materials to the relevant authorized state bodies.

104. The Company provides applicants with the opportunity to send an anonymous message to the Senim Hotline if such a message contains information about upcoming, ongoing or committed corruption and criminal offenses, and also guarantees consideration of such messages provided that the information received is sufficient to verify the facts/circumstances set forth in the message.

105. Information sent to the Senim Hotline is accepted for consideration regardless of the official position of the person who sent the message, as well as the person against whom it was sent.

106. The Company guarantees that the applicant will not be subject to sanctions and other adverse consequences if the message was made in good faith without malicious intent, but the information contained in it was not confirmed by the results of the review of the message.

107. The Company encourages confidential information about possible corruption offenses, illegal actions of a person performing managerial functions in the Company or an employee of the Company without fear that his rights and legitimate interests in the field of labor relations will be violated. However, if it is established that such a message was made by an employee of the Company with malicious intent, as deliberately false (in order to cause harm, slander, gain any advantages or avoid responsibility), then such employee will be subject to

measures of influence in accordance with the applicable legislation of the Republic of Kazakhstan or internal regulatory documents of the Company.

108. The Company guarantees that the Company's employees and other persons who have provided assistance in combating corruption will not suffer from harassment and discrimination in accordance with the legislation of the Republic of Kazakhstan.

109. Employees of the Company and persons who assist in combating corruption in the Company are protected from violations of their rights and legitimate interests in the field of labor relations for three (3) years. years from the date of receipt by authorized state bodies of a report on the fact of a corruption offense or from the moment the person provides other assistance in combating corruption.

110. An individual labor dispute, the party to which are employees of the Company and persons who were previously employees of the Company, providing assistance in combating corruption in the Company is considered and resolved by the Company's conciliation commission in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

111. Guarantees for the protection and non-prosecution of the Company's employees and other persons who assist in combating corruption or fraud in the Company, in addition to those established by the legislation of the Republic of Kazakhstan, are given in appendix 14 of this Policy.

112. Confidentiality of information about the treatment of an employee of the Company or a person who was previously an employee of the Company to a higher-level manager and (or) the management of the Company and (or) to authorized state bodies for the purpose of reporting the fact of a corruption offense or providing information about the whereabouts of a wanted person who committed a corruption offense, or providing other assistance that The importance for the detection, suppression, disclosure and investigation of corruption offenses is provided by the Company's management, members of the conciliation commission, as well as authorized state bodies, if there is an agreement on non-disclosure of information about the assistance provided by this person in combating corruption.

113. When an employee of the Company or a person who was previously an employee of the Company addresses the head and (or) the management of the Company in order to report a corruption offense in the Company or provide other assistance in combating corruption in the Company, the head and (or) the management of the Company are obliged to conclude no later than 24 (twenty-four) hours from the date of the appeal an agreement on non-disclosure of information with the specified person on the provision of assistance by this person in combating corruption, if there is his intention, in accordance with Annex 15 to this Policy.

114. Managers at all levels of the Company are prohibited from preventing or restricting the Company's employees from using the Senim Hotline and/or subjecting the Company's employees who contact the Senim Hotline to any sanctions or other adverse consequences, including demotion, dismissal, deprivation/reduction of bonuses, or bias in decision-making any decisions regarding them, the prosecution of such employees in any form. If sanctions or other adverse consequences are applied to an employee of the Company who contacted the Senim Hotline, the employee of the Company may report this to the Senim Hotline.

## **Chapter 15. Responsibility**

115. Persons performing managerial functions in the Company and employees of the Company for committing corruption offenses are administratively and criminally liable in accordance with the laws of the Republic of Kazakhstan.

116. Persons performing managerial functions in the Company and employees of the Company, to whom administrative and criminal liability measures have been applied for committing corruption offenses, are not exempt from liability for compensation of material damage caused to the Company.

117. Persons performing managerial functions in the Company and employees of the Company are personally responsible for compliance with the requirements of this Policy.

118. The Company's employees are responsible for violating the requirements of this Policy in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulatory documents.

119. The Chairman of the Management Board of the Company is subject to disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-fulfillment or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees.

## **Chapter 16. Final provisions**

120. Issues not regulated by this Policy are resolved in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

121. If certain provisions of this Policy contradict the norms of the legislation of the Republic of Kazakhstan, it is necessary to be guided by the norms of the current legislation of the Republic of Kazakhstan with the subsequent alignment of the provisions of this Policy.

122. In case of amendments and additions to the current legislation of the Republic of Kazakhstan regulating anti-corruption issues, the norms of this Policy apply to the extent that they do not contradict the legislation of the Republic of Kazakhstan.

123. Persons performing managerial functions and employees of the Company from the date of adoption of the Policy, and newly accepted persons from the moment of the beginning of their official and (or) labor duties in the Company are required to confirm that they have studied and undertake to follow the Policy in good faith.

124. Confirmations of persons performing managerial functions in the Company and employees of the Company on studying and following the Policy are drawn up in accordance with the form provided for in Appendix 2 to this Policy, on paper by affixing the signature of the confirming person or in the form of an electronic document generated in the Company's information system, certified by the electronic digital signature of the confirming person.

125. The Compliance Service is a responsible structural unit of the Company that monitors the timely and proper receipt of confirmations on the study and compliance with the Policy from persons performing managerial functions in the Company and employees of the Company, as well as from newly hired employees of the Company.

126. Persons performing managerial functions and employees of the Company are required to take measures established by the Law of the Republic of Kazakhstan on Combating Corruption, including the adoption of anti-corruption restrictions and financial control, as well as the provision of tax returns in accordance with the tax legislation of the Republic of Kazakhstan.

**Anti-corruption standards  
of the Export Credit Agency of Kazakhstan Joint Stock Company**

**Chapter 1. General provisions**

1. The anti-corruption standards of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Company) have been developed in accordance with paragraph 2 of Article 10 of the Law of the Republic of Kazakhstan "On Combating Corruption", the Company's Anti-Corruption Policy, internal regulatory documents of the Company and represent a system of prohibitions, restrictions and permits in the Company's activities.

2. The name of the sphere of public relations: relations with clients arising in the process of providing insurance or guarantee services (products) by the Company.

3. Anti-corruption standards are aimed at achieving an atmosphere of intolerance to any manifestations of corruption in Society by creating a system of value and moral anti-corruption guidelines for employees of the Company in the exercise of their work and (or) official duties and functions.

4. The objectives of the anti-corruption standards are:

- 1) formation of an anti-corruption culture and increasing the responsibility of the Company's employees in the performance of labor and (or) official duties;
- 2) timely detection of corruption and prevention of its negative consequences;
- 3) improving the efficiency and transparency of the Company's activities.

5. Anti-corruption standards define the actions and decisions of the Company's employees aimed at strict observance of the established rules and prevention of corruption in the Company's activities.

6. Anti-corruption standards are mandatory for all employees of the Company.

7. Each employee of the Company bears personal responsibility for non-fulfillment or improper fulfillment of the requirements of these anti-corruption standards.

**Chapter 2. Rules of conduct (actions) of the Company's employees**

**1. When exercising the rights and legitimate interests of individuals and legal entities in the area affected by the anti-corruption standard, an employee of the Company must:**

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

2) to prevent the claim of information and documents not provided for by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company during the provision of services (products) Societies;

3) ensure the observance and protection of the rights, freedoms and legitimate interests of citizens and legal entities, consider citizens' appeals in accordance with the procedure and deadlines established by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company, and take necessary measures on them;

4) immediately inform the Compliance Service through the channels of the Senim hotline or in any other way about known manifestations of corruption, including inducement to obtain any benefit for an action (inaction) when considering applications;

5) not to enter into non-official relations with applicants for the services of the Company;

- 6) be impartial and independent from the activities of political parties, public and religious associations;
- 7) to take measures on an ongoing basis to improve the quality of the services provided by the Company;
- 8) not to disclose confidential information obtained during the performance of labor and (or) official duties, to ensure the observance of insurance secrecy, commercial secrecy, and other legally protected information, and not to use this information in order to obtain property and non-property benefits and advantages;
- 9) to report to the immediate or direct supervisor or to the Compliance Service about the occurrence of a conflict of interest, personal interest in the performance of labor and (or) official duties, about inducement to commit corruption offenses and receiving gifts;
- 10) take measures to eliminate conflicts of interest in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulatory documents;
- 11) contact higher management if the immediate supervisor is himself involved in a conflict of interest;
- 12) take an active part in combating corruption, uncovering corruption offenses and bear personal responsibility for compliance with the legislation of the Republic of Kazakhstan on combating corruption;
- 13) to support and require colleagues to adhere to a high legal and anti-corruption culture;
- 14) to prevent actions (inaction) that make it difficult for individuals and legal entities to exercise their rights and legitimate interests;
- 15) not to incite other persons to commit corruption offenses;
- 16) not to use their official position to influence decision makers on legal relations arising from the performance of their services by the Company in order to unlawfully obtain or extract property and non-property benefits and advantages;
- 17) do not accept remuneration for the performance of their work and (or) official duties, including cash, services, gifts, goods from legal entities and individuals.

**2. When preparing and making managerial and other decisions within their competence, managers at all levels need to:**

- 1) when selecting candidates for appointment to a vacant position, ensure compliance with the principles of meritocracy; prevent candidates from being selected on the grounds of matrimony, close kinship (parents, children, adoptive parents, adopted children, full and half siblings, grandfathers, grandmothers, grandchildren), relatives (close relatives the other spouse);
- 2) accurately determine the tasks and scope of official powers of subordinate employees;
- 3) to prevent uneven distribution of the workload between employees who are subordinate;
- 4) to show fairness and objectivity in evaluating the performance of subordinate employees, as well as the application of incentives and penalties;
- 5) do not give subordinate employees orders that are clearly impossible or beyond the scope of their official duties, as well as orders that contradict the legislation of the Republic of Kazakhstan;
- 6) do not use your official position to influence the activities of subordinate employees when dealing with non-official matters or executing personal assignments;
- 7) not to force subordinate employees to commit corruption offenses;
- 8) to prevent and suppress violations of the anti-corruption legislation of the Republic of Kazakhstan by subordinates and other employees;
- 9) Take timely and comprehensive measures to resolve conflicts of interest that have arisen with a subordinate employee in the course of performing his official duties;
- 10) Take comprehensive measures to prevent corruption;
- 11) eliminate the causes and conditions that contribute to the commission of corruption offenses by subordinate employees;



- 12) to prevent the involvement of subordinate employees to carry out off-duty or personal assignments;
- 13) to set an example to subordinate employees by his impeccable behavior;
- 14) do not use your official position in the exercise of labor and/or official duties in order to benefit yourself or third parties;
- 15) not to participate in gambling of a monetary or other property nature with a superior, subordinate or otherwise dependent on official duties.

**3. When preparing drafts of the Company's internal regulatory documents, an employee of the Company must:**

- 1) Take measures to conduct an expert examination of draft internal regulatory documents of the Company in order to identify corruption-causing factors that create conditions and causes that contribute to the commission of illegal actions of a corrupt and other illegal nature by employees of the Company and reflect appropriate preventive measures in them;
- 2) assist in conducting anti-corruption monitoring and internal analysis of corruption risks in accordance with previously adopted internal regulatory documents of the Company. If corruption-causing factors are found in them, take measures to eliminate them.

**4. In the case of other relationships arising in the performance of their duties, an employee of the Company is obliged to:**

- 1) to prevent the commission of actions capable of discrediting Society;
- 2) not to be guided by personal and (or) selfish interests in the performance of labor and (or) official duties;
- 3) to refrain from contacting colleagues and supervisors with unlawful requests that violate the established order of relations, which may influence their making an impartial official decision;
- 4) To take measures on an ongoing basis to eliminate the causes and conditions of possible conflict of interest, corruption offenses and their consequences;
- 5) not to use for non-official purposes the means of material, technical, financial and informational support, as well as other assets of the Company and official information that has become known in the framework of the performance of labor and (or) official duties;
- 6) When performing labor and/or official duties, comply with the requirements of the Company's Code of Business Ethics;
- 7) refuse to be appointed to a position if it is related to direct subordination or control to persons who are in close family and family relationships.

**5. When performing functions in the field of procurement of goods, works and services, an employee of the Company must:**

- 1) do not assist anyone in carrying out business and other activities related to personal gain;
- 2) not to exert any pressure on the activities of the tender/expert commission and decision-making by the tender/expert commission;
- 3) to provide potential suppliers with equal opportunities to ensure fair competition when participating in procurement procedures for goods, works and services of the Company;
- 4) to ensure the openness and transparency of the Company's procurement processes;
- 5) to prevent corruption in the procurement of goods, works and services of the Company;
- 6) immediately inform the management and the Compliance Service through the channels of the Senim Hotline or in any other way about the known manifestations of corruption, as well as about the inducement to receive any benefit for the action (inaction) when considering applications from individuals and (or) legal entities.



## CONFIRMATION

Use this form to confirm that you have carefully studied, understood and are committed to faithfully follow the Anti-Corruption Policy of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Policy).

Persons performing managerial functions in the Company and employees of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Company) are required to send this completed and signed form to the structural unit responsible for human resource management in the Company from the date of adoption of the Policy, and newly adopted ones - from the moment of commencement of employment and (or) official duties. responsibilities in Society.

<i>Please fill out this form, sign it, and send it in hard copy to the structural unit responsible for human resource management in the Company.</i>	From the moment you begin to perform your work and/or official duties in the Company, you must carefully study, understand and faithfully follow the Policy.	
	<b>Your confirmation</b>	
	<i>(Please mark the corresponding cells)</i>	
	<input type="checkbox"/>	I confirm that I have studied and understood the Policy.
	<input type="checkbox"/>	I commit to faithfully follow the Policy.
	<input type="checkbox"/>	<i>Please sign here.</i>
<input type="checkbox"/>	<i>FCs</i>	
<input type="checkbox"/>	<i>Signature</i>	<i>Date</i>

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

I, (FULL NAME) \_\_\_\_\_, current position \_\_\_\_\_ in Export Credit Agency of Kazakhstan Joint Stock Company, in accordance with paragraph 1 of Article 12 The Law of the Republic of Kazakhstan "On Combating Corruption", as well as in order to comply with the requirements of the Anti-Corruption Policy of the Export Credit Agency of Kazakhstan JSC, I assume the following anti-corruption restrictions on:

1) carrying out activities incompatible with the performance of functional duties in the Company;

2) the inadmissibility of joint service (work) of close relatives, spouses and relatives, including in the same structural unit and having close relatives, spouse and/or relatives directly subordinate, or in different departments if the position is functionally related (in terms of business processes and procedures) to the positions held by their close relatives, spouses and relatives;

3) the 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;

4) accepting financial remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions fall within my official powers of the persons specified in the first paragraph, or these persons, by virtue of their official position, may contribute to such actions (inaction);

5) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan;

6) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan "On Gambling", as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of networks telecommunications, including the Internet.

I undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan.

I undertake to notify the management of the Company in writing about my close relatives, spouse and (or) relatives working in the Company before I am hired or within 1 (one) business day from the date of occurrence of such a circumstance. I am notified that if I do not voluntarily eliminate such a violation within 3 (three) months of the discovery of the specified violation, I will be transferred to a position that excludes such subordination/collaboration in one collegial body of the Company, and if such a transfer is not possible, one of these employees will be dismissed from his position or otherwise exemption from the specified functions.

I have been notified that if I violate the anti-corruption legislation of the Republic of Kazakhstan, I may be held accountable, including dismissed from my position, in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

I have been notified that the money deposited into my account or the accounts of my family members <sup>2</sup>without our knowledge, as well as the funds received by me or them in violation of

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<sup>2</sup> Family members are defined as a spouse, parents, children, including adults, and persons who are dependent and permanently residing with them.

subitems 4) of paragraph 1 and paragraph 5 of Article 12 of the Anti-Corruption Law, are subject to transfer to the republican budget no more than two weeks after their discovery. with the submission of an explanation to the relevant state revenue authority on the circumstances of receipt of such funds.

I am notified that gifts received without the knowledge of me or my family members, as well as received by me and them in violation of subitems 4) of paragraph 1 and paragraph 5 of Article 12 of the Law on Combating Corruption, are subject to gratuitous transfer to the authorized state property management body within 7 (seven) calendar days from the date of receipt of the gift or from the day when I or we became aware of the receipt of the gift, and the services rendered to the specified persons under the same circumstances must be paid for by transferring money to the republican budget within 7 (seven) calendar days from the date of the provision of the service or from the day when I became aware of the provision of the service.

At the same time, the person who gave the gift to the authorized state property management body has the right, with notification to a higher official, to redeem it at a cost determined in accordance with the Law of the Republic of Kazakhstan "On Valuation Activities in the Republic of Kazakhstan", on the basis of a purchase and sale agreement concluded with the authorized state property management body. The proceeds from the sale of gifts are transferred to the republican budget.

I will not have any further claims against the Company regarding the collection, storage, processing and cross-border transfer of my personal data, provided that the Company complies with the requirements of the current legislation of the Republic of Kazakhstan.

I have been notified that failure to comply with anti-corruption restrictions entails refusal to accept a position or dismissal from office (dismissal from office, termination of powers), non-compliance with them is the basis for dismissal (dismissal from office, termination of powers).

Signature of the official \_\_\_\_\_ date \_\_\_\_\_

## **Analytical report on the results of thematic anti-corruption monitoring**

### **I. The introductory part**

1. The name of the field of activity of the quasi-public sector entity, on whose activities the thematic anti-corruption monitoring was carried out:  
\_\_\_\_\_.
2. Thematic anti-corruption monitoring was conducted: individual/legal entity, e-mail address, phone number \_\_\_\_\_.
3. The period of thematic anti-corruption monitoring: started \_\_\_\_ finished \_\_\_\_\_.

### **II. Information and analytical part**

Quantitative and qualitative indicators characterizing the state and causes of corruption in the activities of Export Credit Agency of Kazakhstan JSC.

### **III. The final part**

Conclusions. Quantitative and/or qualitative indicators that make it possible to measure the effectiveness of anti-corruption law enforcement practices, and a decision in accordance with paragraph 17 of this Policy.

**Position of a Compliance Service employee**

**Full Name**

### **The procedure for determining the object of internal analysis of corruption risks**

1. To determine the object of analysis, before conducting an internal analysis of corruption risks, the Compliance Service determines the priority rating for conducting an internal analysis of corruption risks.

2. The rating of the priority of conducting an internal analysis of corruption risks is determined on the basis of a map and a matrix of compliance risks (risks of corruption and fraud).

3. The business process priority rating is determined based on the total number of compliance risks of corruption and fraud located in the "high (red)" and "medium (yellow)" zones of the risk map.

At the same time, when ranking business processes, business processes whose compliance risks are in the "high (red)" zone of the risk map are recognized as priorities for conducting an internal analysis of corruption risks.

The next priority in the ranking is business processes located in the "middle (yellow)" zone of the risk map.

4. The business process priority ratings defined in paragraph 3 of this annex are ranked in descending order and divided into 4 (four) groups.:

- 1) The first 10% of business processes represent a high priority group;
- 2) The next 30% represent a high-priority group;
- 3) The next 40% represent a moderate priority group;
- 4) The last group of 20%, which has the lowest rating, is considered a low priority group.

5. Business processes for which an internal corruption risk analysis has been conducted over the past two (2) years or control or audit inspections by authorized state bodies of the Republic of Kazakhstan or the Sole Shareholder have been conducted over the past year are excluded from the priority group for conducting an internal corruption risk analysis.

6. All business processes included in the high priority group are recognized as the object of internal analysis of corruption risks.

7. The activity of the structural subdivision of the Company, which is the owner of the analyzed business process, is recognized as the object of analysis.

8. In the absence of business processes from the high priority group, it is allowed to identify, for the purposes of conducting an internal analysis of corruption risks, business processes from groups of high, moderate and low priorities, based on the results of which there were recommendations to eliminate identified corruption risks within the framework of anti-corruption monitoring.

9. In order to conduct a high-quality and full-fledged internal analysis of corruption risks, effective allocation of labor and time resources of the Compliance Service, the analysis is carried out in relation to no more than 3 (three) business processes of the Company.

**Work plan for conducting  
internal analysis of corruption risks**

<b>No. p / p</b>	<b>Types of work</b>	<b>Deadlines for execution</b>	<b>Responsible persons</b>
<b>1</b>	<b>Collecting complete information for conducting an internal analysis of corruption risks:</b>		
<b>2</b>	<b>Analysis of regulatory legal acts and internal regulatory documents of the Company regulating the Company's activities the object of the analysis, its organizational and managerial activities for the presence of corruption risks, <i>including in the areas of activity:</i></b>		
<b>3</b>	<b>Defining positions, susceptible to corruption risks, with their formation the list</b>		
<b>4</b>	<b>Preparation of an analytical report</b>		
<b>5</b>	<b>Signing of the analytical report</b>		
<b>6</b>	<b>Development and signing of an action plan to eliminate the causes and conditions conducive to the commission of corruption offenses identified by the results of an internal analysis of corruption risks</b>		
<b>7</b>	<b>Monitoring the implementation of the recommendation</b>		
<b>8</b>	<b>Submission of a report to the Board of Directors of the Company</b>		
<b>9</b>	<b>Other organizational issues that may arise during the internal analysis of corruption risks, including the involvement of additional forces for the analysis</b>		



## **Analytical report**

**Introductory part:** the name of the object of analysis, the analyzed period, the details of the order on the internal analysis of corruption risks and the date of its implementation, the full name of the authorized person, members of the working group.

### **The descriptive part:**

**1. Identification of corruption risks in the Company's internal regulatory documents affecting the activities of the object of analysis.**

**2. Identification of corruption risks in the organizational and managerial activities of the object of analysis.**

**2.1. Personnel management, including the identification of positions subject to corruption risks**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- an approximate list of corruption-causing functions;
- a list of positions subject to corruption risks;
- recommendations for its elimination.

**2.2. Conflict of interest resolution**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- recommendations for its elimination.

**2.3. Development and allocation of budgetary and financial resources**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- recommendations for its elimination.

**2.4. Conclusion of contracts with individuals and legal entities**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- recommendations for its elimination.

**2.5. Development and operation of information systems**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- recommendations for its elimination.

**2.6. Other issues arising from organizational and managerial activities**

- the name of the corruption risks in the NPA, business processes;
- description of corruption risk;
- recommendations for its elimination.

### **Applications**

### **Conclusions:**

**The list of positions subject to corruption risks identified based on the results of an  
internal corruption risk analysis**

Name of the object of internal analysis of corruption risks:

\_\_\_\_\_

<b>A position at risk of corruption</b>	<b>Official powers containing corruption risks</b>	<b>Corruption risks</b>	<b>The level of corruption risks</b>

**Approving**

\_\_\_\_\_  
(position of the head of the object of analysis,  
surname, initials)

\_\_\_\_\_  
(signature of the head of the analysis facility)  
" \_\_\_\_ " \_\_\_\_\_ 20 \_\_\_\_ year

**An action plan to eliminate the causes and conditions conducive to the commission  
of corruption offenses identified by the results of an internal analysis of corruption risks in**

\_\_\_\_\_  
(name of the object of analysis)

<b>No. p / p</b>	<b>Recommendation based on the results internal analysis of corruption risks</b>	<b>Event</b>	<b>Event completion form</b>	<b>Responsible s performers</b>	<b>The deadline for the execution of the event</b>
<b>1.</b>					

**Information on the progress of the implementation of recommendations made based  
on the results of internal analysis of corruption risks**

<b>No. p / p</b>	<b>Recommendations based on the results of an internal corruption analysis risks</b>	<b>Completion form according to the action plan</b>	<b>Information about the implementation of the recommendation</b>
<b>1.</b>			

**Information on the implementation of recommendations made based on the results  
of the internal analysis of corruption risks**

Name of the object of internal analysis of corruption risks:

The deadline for conducting an internal analysis of corruption risks: \_\_\_\_\_

Date of signing the analytical report: \_\_\_\_\_

<b>No. p / p</b>	<b>Recommendation based on the results of an internal corruption analysis risks</b>	<b>Completion form according to the action plan</b>	<b>Information about the implementation of the recommendation</b>
<b>1.</b>			

**The results of monitoring the implementation of recommendations are the object of an internal analysis of corruption risks**

Name of the object of internal analysis of corruption risks: \_\_\_\_\_

The period of the analysis: \_\_\_\_\_

Date of signing the analytical report: \_\_\_\_\_

A total of \_\_\_\_ recommendations have been made.

Of these:

executed in full – \_\_\_\_;

partially executed – \_\_\_\_;

not executed – \_\_\_\_;

no longer relevant – \_\_\_\_.

<b>No. p / p</b>	<b>Recommendation based on the results internal analysis of corruption risks</b>	<b>Form completions according to the plan events</b>	<b>Information about execution</b>	<b>Face assessment, authorized representative for conducting internal analysis</b>
<b>1.</b>				

**The form of the Journal of registration of gifts and acts of hospitality**

<b>No  . p  / p</b>	<b>Date of the act of hospitality, receipt of the gift</b>	<b>Full name and position of the person who submitted the notification of receipt of the gift</b>	<b>Name of the gift, description of the act of hospitality</b>	<b>Full name and position of the person who received the gift</b>	<b>Name and full name of the donor</b>	<b>Special marks</b>
<b>1.</b>						

**Guarantees of protection and non-harassment of employees of the Export Credit Agency of Kazakhstan JSC and persons providing assistance in combating corruption or fraud in the Export Credit Agency of Kazakhstan JSC**

1. These Guarantees for Ensuring the protection and non-harassment of employees of Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Company) and persons who assist in combating corruption and (or) fraud at Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Guarantees) establish minimum requirements for the Company in order to ensure the protection of the Company's employees and other persons who assist in combating corruption and (or) cases of fraud in the Company, taking into account the provisions of the Anti-Corruption Policy of the Export Credit Agency of Kazakhstan JSC and the Instructions on Preventing and Combating Corruption and Fraud in the Export Credit Agency of Kazakhstan JSC.

2. These Guarantees apply to the Company's employees and persons who provide (have provided) assistance in combating corruption and (or) cases of fraud in the Company, as a result of direct or indirect interaction with the Company.

3. Persons who anonymously report or publicly disclose information about possible corruption offenses and/or cases of fraud in the Company, but who were subsequently identified and prosecuted, are also subject to these Guarantees, provided that this information does not carry malicious intent and is not knowingly false.

4. These Guarantees do not apply to persons who knowingly provide false information about the fact of a corruption offense and (or) fraud in the Company with malicious intent, who bear responsibility established by the laws of the Republic of Kazakhstan.

5. The Company, in addition to the measures provided for by the laws of the Republic of Kazakhstan, also guarantees protection from the following measures of harassment or discrimination of the Company's employees and other persons who assist in combating corruption and (or) cases of fraud in the Company:

- 1) removal from office, dismissal or other equivalent measures;
- 2) demotion or refusal of promotion;
- 3) transfer to another job, reduction of wages or bonuses, change of working hours;
- 4) suspension of social support or training;
- 5) negative assessment of performance or characteristics from the workplace;
- 6) the imposition or application of any disciplinary measure without a decision of the conciliation commission formed in accordance with the legislation of the Republic of Kazakhstan;
- 7) coercion, intimidation, harassment or ostracism;
- 8) discrimination in various forms or unfair treatment;
- 9) refusal to extend or early termination of an employment contract or a civil law contract, if the employee or the person had legitimate grounds for continuing the employment or contractual relationship;
- 10) harming a person's reputation, including the media and social networks;
- 11) blacklisting on the basis of an industry-wide or industry-wide informal or formal agreement, entailing:
  - the occurrence of obstacles for a person in the future when applying for employment in this sector or industry;
  - refusal to provide goods, works, or services in a sector or industry over which the Company has influence;



12) refusal to provide the Company's services if the person had legitimate grounds to receive them;

13) early termination or termination of a contract for the supply of goods, works or services, if the person had legitimate grounds to continue the contractual relationship.

6. Employees of the Company and persons providing services assistance in combating corruption and (or) cases of fraud in the Company, or those who are being persecuted or discriminated against for this report, have the right to seek advice and protection from the Company's Compliance Service in person or by sending a message through the Senim Hotline.

7. Confidentiality of information on the treatment of employees of the Company or persons who were previously employees of the Company for the purpose of reporting the fact of a corruption offense or providing information on the whereabouts of a wanted person who committed a corruption offense, or providing other assistance that is (subsequently) important for the detection, suppression, disclosure and investigation of a corruption offense and (or) in cases of fraud in the Company, it is ensured if there is a signed non-disclosure agreement on the provision of assistance by this employee of the Company or a person in combating corruption.

8. An individual labor dispute, the party to which are employees of the Company and persons who were previously employees of the Company, providing assistance in combating corruption in the Company is considered and resolved by the Company's conciliation commission in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

9. Employees of the Company and persons providing (who have provided) assistance in combating corruption in the Company shall be protected from violations of their rights and legitimate interests in the field of labor relations for a period of 3 (three) years. years from the date of receipt by authorized state bodies of a report on the fact of a corruption offense or from the moment the person provides other assistance in combating corruption.

**Agreement  
on non-disclosure of information on assistance in combating corruption**

Astana city

"\_\_\_" \_\_\_\_\_ 20\_\_

Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Company), represented by \_\_\_\_\_, acting on the basis of \_\_\_\_\_ with on the one hand, hereinafter referred to as the "Head",

and \_\_\_\_\_ (last name, first name, patronymic (if any) of the employee)

on the other hand, hereinafter referred to as the "Employee", hereinafter collectively referred to as the "Parties", pursuant to the provisions of subparagraph 26) of paragraph 1 of Article 22 and subparagraph 29) of paragraph 2 of Article 23 of the Labor Code of the Republic of Kazakhstan, paragraphs 1, 2 and 4 of Article 24, subparagraph 2) of Article 24-1 and paragraph 2 of Article 24-3 of the Law of the Republic of Kazakhstan "On Combating Corruption" concluded this Agreement on the following:

**Subject of the agreement**

1.1. By this Agreement, the Parties guarantee the non-disclosure of information about the Employee's appeal to the Supervisor in order to inform about

\_\_\_\_\_  
(the essence of the corruption offense)  
in the Export Credit Agency of Kazakhstan JSC  
or \_\_\_\_\_

\_\_\_\_\_  
(the essence of the other assistance provided in combating corruption)  
In the Export Credit Agency of Kazakhstan JSC (hereinafter referred to as confidential information), except for the cases provided for in clauses 2.1. and 2.2. of this Agreement.

**Obligations of the Parties**

2.1. The employee undertakes to:

1) after the conclusion of this Agreement, immediately inform the Head of the information that has become known to him about an impending, committed or committed corruption offense in the Company in which he works (worked), and (or) information aimed at providing other assistance in combating corruption in the Company in which he works (worked);

2) not to inform the Head of deliberately false information about a corruption offense;

3) not to disclose confidential information to other persons, except for:

officials of authorized state bodies and courts involved in the corruption case, which was reported by the Employee or the Employee provided other assistance in this case;

officials of the relevant authorized state body and the authorized anti-corruption body involved in the payment of a one-time monetary remuneration to an Employee;

4) if an application is submitted to the conciliation commission (if any) for consideration of an individual labor dispute within three years from the date of receipt by authorized state bodies

of the Employee's notification of the fact of a corruption offense or from the moment they provide other assistance in combating corruption specified in clause 1.1. of this Agreement, notify the Head of the upcoming consideration of the individual labor dispute by the conciliation commission no later than three working days before the date of submission of the application to the conciliation commission;

5) not to use information about a corruption offense that has become known to him for personal interests or the interests of third parties;

6) to ensure the safety of this Agreement;

7) in the event of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately inform the Supervisor with whom an agreement on non-disclosure of confidential information has been concluded.

2.2. The manager undertakes to:

1) not to require an Employee to provide information that is not related to a corruption offense that is being prepared, committed, or committed;

2) immediately transfer information about a corruption offense that is being prepared, committed, or committed, and (or) information received from an Employee aimed at providing other assistance in combating corruption to an authorized state body, provided that an agreement on non-disclosure of confidential information is concluded with an official of the authorized state body;

3) not to disclose confidential information to other persons, except for:  
officials of authorized state bodies and courts involved in the corruption case, which was reported by the Employee or the Employee provided other assistance in this case;

members of the conciliation commission, disciplinary commission or other collegial body of the Company in the cases provided for in subparagraphs 4) and 5) of this paragraph;

officials of the authorized anti-corruption body invited to a meeting of the conciliation commission, disciplinary commission or other collegial body of the Company;

4) if the conciliation commission considers (if any) an individual labor dispute to which the Employee is a party, notify the members of the conciliation commission within three years from the date on which the authorized state bodies receive the Employee's notice of a corruption offense or from the moment they provide other assistance in combating corruption specified in clause 1.1. of this Agreement. on the availability of this Agreement no later than the day the Employee submits an application to the conciliation commission;

5) ensure that an agreement on non-disclosure of confidential information is signed by an official of the authorized anti-corruption body invited to a meeting of the conciliation commission, disciplinary commission or other collegial body of the Company;

6) not to use information about an impending, committed or committed corruption offense and (or) information aimed at providing other assistance in combating corruption received from an Employee in the personal interests or interests of third parties;

7) to ensure the safety of this Agreement;

8) in the event of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately inform the authorized state body with which an agreement on non-disclosure of confidential information has been concluded.

## **Final provisions**

3.1. By signing this Agreement, the Employee and the Supervisor confirm that they have been warned that they will be criminally liable for disclosing confidential information in accordance with the current legislation of the Republic of Kazakhstan.

3.2. This Agreement comes into force from the moment of its signing by the Parties and is valid for the duration of the employment contract between the Employee and the state body /

organization in which the Employee works, and after termination of the employment contract – indefinitely.

3.3. This Agreement is drawn up in two copies in the state or Russian language, having the same legal force, one copy for each of the Parties.

### **Addresses, banking details and signatures of the Parties**

**Director:**

Export Credit Agency of Kazakhstan Joint Stock Company

BIN 030840002763

Legal address: Astana, Yesil district, 55a Mangilik El Ave., 11th floor

Contact phone number: +7 7172 955656

Post:

\_\_\_\_\_/\_\_\_\_\_  
(signature) (surname, initials)

Seal

**Employee:**

Last name, first name, patronymic (if any) \_\_\_\_\_

\_\_\_\_\_  
Identification document No. \_\_\_\_\_

from " \_\_ " \_\_\_\_\_. \_\_\_\_\_ issued

IIN \_\_\_\_\_

Residential address \_\_\_\_\_

Contact phone number

\_\_\_\_\_/\_\_\_\_\_  
(signature) (surname, initials)

**A copy of the present**

**Agreements received:** \_\_\_\_\_/\_\_\_\_\_  
(last name, initials) (signature)

**Date:** " \_\_ " \_\_\_\_\_ 20\_\_\_\_