

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
(with amendments and additions as of October 01, 2025)

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

Content

Content	3
Chapter 1. General provisions	4
Chapter 2. Anti-corruption goals, principles, and objectives	6
Chapter 2–1. Anti-Bribery Management System.....	6
Chapter 3. Types of corruption offenses	8
Chapter 4. Anti-corruption measures.....	8
Chapter 5. Measures to prevent corruption and fraud	9
Chapter 6. Anti-corruption monitoring.....	10
Chapter 7. Internal analysis of corruption risks.....	11
Chapter 8. Anti-corruption standards	12
Chapter 9. Anti-corruption restrictions.....	12
Chapter 10. Conflict of interest prevention and resolution	15
Chapter 11. Formation of an anti-corruption culture.....	15
Chapter 12. Financial control measures	15
Chapter 13. Giving, accepting gifts, and other services (tokens of attention).....	16
Chapter 14. Procedure for reviewing reports of corruption.....	17
Chapter 15. Responsibility	18
Chapter 16. Final provisions.....	19
Appendix 1	20
Appendix 2	Ошибка! Закладка не определена.
Appendix 3	24
Appendix 4.....	26
Appendix 5	27
Appendix 6.....	28
Appendix 7.....	28
Appendix 8.....	30
Appendix 9.....	31
Appendix 10.....	32
Appendix 11	33
Appendix 12	34
Appendix 13.....	35
Appendix 14.....	35
Appendix 15.....	38
Appendix 16.....	356
Appendix 17.....	357
Appendix 18.....	389

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).

1-1. The Society's Development Plan recognizes sustainable development of the Society as a priority. Any form of corruption manifestation is prohibited within the Society.

1-2. The Society has developed, implemented, and maintains an anti-bribery management system.

1-3. The Society undertakes the commitment to continuously improve the anti-bribery management system, including the enhancement of internal processes, increasing awareness among employees and other interested parties, as well as regularly assessing the effectiveness of measures taken and implementing appropriate corrective actions.

1-4. The scope of application of the anti-bribery management system extends to all activities and all structural divisions of the Society.

1-5. Persons performing managerial functions in the Society and employees of the Society are obliged to comply with the requirements of the legislation of the Republic of Kazakhstan on anti-corruption, as well as with the requirements of the anti-bribery management system.

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) Compliance Service – a structural subdivision of the Society, directly subordinate and accountable to the Board of Directors of the Society, which organizes and conducts measures for counteracting the legalization (laundering) of proceeds of crime, the financing of terrorism, and

the financing of the proliferation of weapons of mass destruction in the activities of the Society; performs internal control over the compliance of the Society's activities with the requirements of the legislation of the Republic of Kazakhstan, international standards, and the internal documents of the Society; ensures implementation of the Society's Compliance Risk Management Policy and compliance control functions; organizes and ensures the functioning of the anti-corruption and fraud prevention system; is vested with authority and responsibility to monitor the development, operation, and continuous improvement of the Society's anti-bribery management system; and is also responsible for the implementation of other functions in accordance with the Regulation 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;

22-1) ABMS — Anti-Bribery Management System;

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;

11) meeting the expectations and requirements of interested parties regarding the effective functioning of the ABMS within the Society.

Chapter 2–1. Anti-Bribery Management System

6-1. For the purpose of effective management of corruption risk within the Society, the Compliance Service shall, at least once (1) a year, conduct a SWOT analysis of external and internal factors affecting the ABMS using the form set forth in Appendix 16 to this Policy, as well as an analysis of the expectations and needs of interested parties in accordance with Appendix 17 to this Policy.

6-2. Based on the results of the SWOT analysis, the identification of the requirements of interested parties, and the assessment of corruption risks within the Society, ABMS objectives and measures to achieve them shall be established and approved by the Management Board of the Society in the form provided in Appendix 18 to this Policy.

The ABMS objectives and the measures for their achievement, approved by the Management Board of the Society, shall be subject to monitoring by the Compliance Service.

The Management Board of the Society shall revise the ABMS objectives as the established measures are implemented.

6-3. The Compliance Service shall, at least once (1) a year, carry out an analysis of the effectiveness of the functioning of the ABMS and provide the results of such analysis to the Management Board of the Society in accordance with the internal document of the Society regulating the monitoring and analysis of the ABMS.

6-4. The Management Board of the Society shall, at least once (1) a year, review the results of the analysis conducted by the Compliance Service on the effectiveness of the functioning of the ABMS and, if necessary, make decisions to improve the ABMS.

6-5. The results of the analyses of ABMS performance conducted by the Compliance Service and the Management Board of the Society shall be submitted by the Compliance Service for consideration by the Board of Directors of the Society at least once (1) a year.

6-6. The Board of Directors of the Society shall, at least once (1) a year, review the written results of the ABMS performance analyses presented by the Compliance Service, conducted by both the Compliance Service and the Management Board of the Society, and, if necessary, based on the results thereof, determine the necessity and/or possibility of introducing changes for the purpose of improving the ABMS.

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) establishment and observance of anti-corruption standards and ABMS requirements;

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 the ABMS, 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 requirements of the ABMS, 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 comprehensive due diligence in relation to special categories of transactions and/or planned or existing relationships with counterparties and/or certain categories of employees holding specific positions or candidates for vacancies in the Society, including outsourced employees;

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. Excluded.

24. Excluded.

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

25. Internal analysis of corruption risks shall be conducted in accordance with the internal document regulating the identification, assessment, and analysis of corruption risks of the Society, at least once (1) a year, within the timeframes stipulated by the Work Plan (Compliance Program) of the Compliance Service, approved by the Board of Directors of the Society.

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. Excluded.

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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 ¹performing 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 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, performance of military service in reserve.

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

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

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. Excluded.

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. Excluded.

- 89. Excluded.
- 90. Excluded.
- 91. Excluded.
- 92. Excluded.
- 93. Excluded.
- 94. Excluded.
- 95. Excluded.

95-1. The procedure for resolving issues related to the giving of gifts, extending invitations, business hospitality gestures, and corresponding representative expenses of the Society, with the aim of minimizing the likelihood of corruption risks associated with the acceptance of gifts and benefits, shall be governed by the internal document of the Society on the prevention and counteraction of corruption and fraud.

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. Excluded.

100. Excluded.

101. Excluded.

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. Excluded.

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. Excluded.

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. Excluded.

113. Excluded.

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.

114-1. The procedure for the functioning of the 'Senim' Hotline channel, the receipt and processing of information on indications of corrupt behavior or fraud, and the response procedures regarding reported facts shall be governed by the internal document of the Society on the prevention and counteraction of corruption and fraud.

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 and the requirements of the ABMS.

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.

ACKNOWLEDGEMENT

Please use this form to confirm that you have carefully read, understood, and undertake to faithfully comply with the Anti-Corruption Policy of Joint Stock Company “Export Credit Agency of Kazakhstan” (hereinafter – the Policy).

Persons performing managerial functions in the Society and employees of Joint Stock Company “Export Credit Agency of Kazakhstan” (hereinafter – the Society) are required to submit this completed and signed form to the Compliance Service from the date of adoption of the Policy, and newly hired employees – from the commencement of their employment and/or official duties within the Society.

<p><i>Please complete this form, sign it with a digital signature, and submit it to the Compliance Service. If a digital signature is not available, please submit the signed hard copy of this form to the Compliance Service</i></p>	<p>From the commencement of your employment and/or official duties in the Society, you are required to carefully read, understand, and faithfully comply with the Policy.</p> <p>Your confirmation</p> <p><i>(Please tick the appropriate boxes)</i></p>		
	<input type="checkbox"/>	<p>I confirm that I have read and understood the Policy and the requirements of the ABMS.</p>	
	<input type="checkbox"/>	<p>I undertake to faithfully comply with the Policy and the requirements of the ABMS.</p>	
	<p><i>Please sign here</i></p>		
	<p><i>Full name</i></p>		
	<input type="checkbox"/>	<p><i>Signature</i></p>	<p><i>Date</i></p>
	<p><i>Date</i></p>		

**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 by marriage;
- 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 or 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 ²without our knowledge, as well as the funds received by me or them in violation of 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 _____

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

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

Excluded

Excluded

Excluded

Excluded

Excluded

Excluded

Excluded

Excluded

Excluded

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.

Excluded

SWOT Analysis (Form)

**Analysis of Internal and External Factors of the Anti-Bribery Management System of JSC
“Export Credit Agency of Kazakhstan”**

The analysis of internal and external factors of the Anti-Bribery Management System (organizational context) is presented in the form of a SWOT analysis of the strengths and weaknesses of the internal environment, as well as the opportunities and threats of the external environment, which affect the Society’s ability to achieve the objectives of the Anti-Bribery Management System **ECTBOM**.

Internal Factors	Strengths	Weaknesses
External Factors	Opportunities	Threats

**List of Interested Parties, Their Expectations and Requirements Regarding the ABMS in
Joint Stock Company “Export Credit Agency of Kazakhstan”**

No.	Interested Party	Expectations	Requirements
1	Sole Shareholder	Transparency of operations, preservation of assets	Effective internal control system and ABMS, reporting on measures taken
2	Governing Body	Compliance with the Anti-Corruption Policy, implementation of anti-corruption measures	Existence of an Anti-Corruption Policy, implementation and effectiveness of ABMS, regular monitoring and reporting
3	Management	Maintaining reputation and compliance with legislation	Conducting corruption risk assessment and analysis, training, integration of ABMS into the Society’s business processes
4	Personnel	Fair and transparent procedures for recruitment, career advancement, remuneration, and disciplinary measures; protection from pressure and discrimination	Clearly defined procedures, continuous training and awareness-raising, availability of a reporting channel and protection for whistleblowers
5	Clients	Equal and open access to services	Absence of favoritism, transparent rules and selection criteria
6	State Authorities	Compliance with legislative and regulatory requirements	Implementation of ABMS, anti-corruption reporting, transparency during inspections
7	Subsidiaries of the Holding	Adherence to a unified ethical standard	Application of the Holding’s anti-corruption standards and principles, exchange of experience
8	Competitors	Fair competition, absence of unfair advantages	No abuse of position, prevention of corrupt lobbying
9	Society’s Partners	Transparency of transactions, reliability of relationships	Inclusion of anti-corruption clauses in contracts, due diligence procedures for counterparties

10	Export Credit Agencies	Compliance with international standards	Availability of an implemented and certified ABMS in accordance with ISO 37001 or an equivalent system, access to information on anti-corruption measures
11	International Financial Institutions	ESG sustainability, transparency	Demonstration of compliance and anti-corruption policies and ABMS, disclosure of anti-corruption activities
12	Financial Institutions	Risk mitigation and effective risk management	Transparency of operations, reputational resilience, presence of an anti-corruption prevention system
13	Suppliers	Fair tendering procedures, protection from coercion into corruption	Transparent procurement and acceptance procedures, anti-corruption clauses in contracts, reporting channel and whistleblower protection
14	Foreign Counterparties	Compliance with laws and international standards	Presence of internal control, disclosure of anti-corruption measures, availability of reporting channel and whistleblower protection
15	Public Organizations	Transparency and access to information	Publication of anti-corruption activities, participation in discussions, social accountability
16	Public Council	Oversight of transparency and accountability	Availability of communication channels, provision of information on measures taken
17	Population	Fair use of state resources	Social accountability, openness
18	Mass Media	Access to accurate information, transparency of operations	Free dissemination of information on anti-corruption measures, responsiveness to media inquiries

Appendix 18
of the Anti-Corruption Policy
of the Export Credit Agency of Kazakhstan JSC

Form

*“Approved”
by the decision of the Management Board
of Joint Stock Company
“Export Credit Agency of Kazakhstan”
dated “ _____ ” _____ 20__ No. _____*

Anti-Corruption Objectives and Planning for Their Achievement in JSC “Export Credit Agency of Kazakhstan”

No.	Activity Name	Responsible Person	Deadline for Completion	Method for Evaluating Goal Achievemen
Objective No.:				
1				
2				
...				

Approval sheet

According to the project: Anti-Corruption Policy of the Export Credit Agency of Kazakhstan Joint Stock Company

Developer: Compliance Service.

GNI owner: Compliance Service.

Name of the position	Last name, first name, patronymic (if any)	Signature	Date of signing
Director of the Risk Management Department	L.G. Shabarbayeva		
Director of the Legal Support Department	S.K. Nurmukhambetov		
Director of the Department of Project Management and Information Technology	M.S. Tuyakbaev		

Head of the Compliance Service _____ **A. Zhakaeva**

Performed by: B. Tumenbaev

Ext. number 183