

Annex 20  
to the decision of the Board of Directors  
of Export Credit Agency of Kazakhstan JSC  
dated August 09, 2024, No. 14

**Regulations on the Compliance Service of  
Export Credit Agency of Kazakhstan JSC**  
*(with amendments and additions as of 31.10.2025)*

**Astana, 2024**

**SUMMARY OF IRDs**

Name of the IRD	Regulations on the Compliance Service of Export Credit Agency of Kazakhstan JSC
The owner of the IRD	Compliance Service
Access level	publicly available
Measures to familiarize all employees of the Company with the IRD	E-mailing within 1 (one) business day from the date of posting the IRD on the network disk "Internal Portal"
Amendments and additions made:	
According to the resolution _____ amendments and additions have been made	dated " ____ " _____ 20 ____ No. ____

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## **Chapter 1. General provisions**

1. 1. These Regulations on the Compliance Service (hereinafter – the “Regulations”) of Joint-Stock Company “Export Credit Agency of Kazakhstan” (hereinafter – the “Company”) have been developed in accordance with the requirements of the legislative acts of the Republic of Kazakhstan, regulatory legal acts of the authorized state bodies of the Republic of Kazakhstan, the international standard ISO 37001:2016, as well as the internal regulatory documents (hereinafter – the “IRD”) of the Company.

2. The Regulation defines the status of the Company's Compliance Service (hereinafter referred to as the Service), goals, principles, tasks, functions, rights, duties and responsibilities of the Service, the organization and procedure of the Service, and the interaction of the Service with the Board of Directors of the Company, other authorized bodies of the Company, structural divisions of the Company and employees not included in them, and with other organizations.

3. In its activities, the Service is guided by the legislation of the Republic of Kazakhstan, the IRD of the Company, the Charter of the Company, decisions of the committees and the Board of Directors of the Company, as well as these Regulations.

4. The concepts used in this Regulation are identical to those defined by the legislation of the Republic of Kazakhstan, the Charter and the IRD of the Company.

## **Chapter 2. Organizational status of the Service**

5. The Service is a structural unit subordinate and functionally accountable to the Board of Directors of the Company and exercises its powers independently of the executive body, officials of the Company, is independent of the influence of any persons, while performing the tasks and functions assigned to it in order to properly perform them and ensure objective and independent judgments.

6. The Board of Directors of the Company determines the quantitative composition of the Service, appoints the head and employees of the Service, as well as prematurely terminates their powers, determines the term of office, the procedure and work plan, the amount of the official salary and conditions of remuneration, bonuses for the head and employees of the Service.

7. In order to organize its activities, the Service is administratively subordinated to the Executive Body of the Company, which ensures appropriate working conditions for employees of the Service, remuneration, publication on the basis of decisions taken by the Board of Directors, relevant orders related to the activities of the Service, control over compliance with labor regulations, execution of orders for business trips, vacations, as well as other actions that do not contradict the status of the Service in accordance with this Regulation and other IRD of the Company. The Executive Body should not use administrative supervision to influence the independence and objectivity of the Service.

8. The Executive body, structural divisions, officials and employees of the Company are obliged to assist the Service in the exercise of their functions and the exercise of their rights, including in terms of logistical support for activities and the provision of information and materials requested accordingly.

9. In order to ensure the implementation of the functions and tasks of the Service, the Executive Body of the Company, in order to effectively manage compliance risk, ensures:

1) the adoption and communication to the Company’s employees of the Company’s Anti-Corruption Policy and the Company’s Compliance Risk Management Policy;

2) compliance with the Company’s Anti-Corruption Policy and the Company’s Compliance Risk Management Policy, and submission of quarterly reports to the Company’s Board of Directors;

3) the development of IRDs for the Company’s employees on issues related to the anti-bribery management system and compliance risk management, including corruption risks, risks of legalization (laundering) of proceeds of crime, financing of terrorism and financing of the proliferation of weapons of mass destruction;

4) taking appropriate corrective or disciplinary measures in case of violations involving compliance risk;

5) improvement of software for the timely automated identification of transactions subject to mandatory internal control and suspicious transactions;

6) the presence in the application form for insurance or guarantee payment of a reference to the consequences of providing false information to the Company, provided for in the legislation of the Republic of Kazakhstan and the Company's Internal Revenue Service;

7) training of employees of the structural unit on insurance and guarantee payments of the Company on indicators and signals of fraud.

10. The Service consists of the Head and employees of the Service, appointed and dismissed by order of the Chairman of the Management Board of the Company on the basis of a relevant decision of the Board of Directors of the Company.

11. Qualification requirements, job responsibilities, rights and responsibilities of the head and employees of the Service are established by job descriptions in accordance with annexes 1-2 to this Regulation.

12. Employees of the Service may not hold part-time positions in other structural divisions of the Company.

13. Employees of the Service should not:

1) participate in the inspections of the processes in which they participated during the previous 3 (three) years;

2) participate in activities that could damage the impartiality of the audit or be perceived as causing such damage;

3) use confidential information for personal benefit;

4) violate the norms of business ethics;

5) accept gifts and use services that may result in damage to the independence, objectivity and impartiality of the Service or that may be perceived as causing such damage;

6) participate in committees or other working groups/commissions created by the Company as their members with the right to sign. In the work of these working groups/commissions, employees of the Service can only be involved as observers without the right to vote;

7) take part in inspections, internal investigations and other activities that may lead to a conflict of interest.

14. An employment contract with the head and employees of the Service is concluded and terminated on the basis of a decision of the Board of Directors of the Company by the Chairman of the Management Board of the Company, who exercises other rights and obligations of the employer in accordance with the labor legislation of the Republic of Kazakhstan.

15. Remuneration, annual leave, bonus/remuneration payments, social support and compensation payments for the head and employees of the Service are carried out in accordance with the IRD of the Company.

16. The assessment of the activities of the head and employees of the Service is carried out by the Board of Directors of the Company in accordance with the maps of key performance indicators of the head and employees of the Service approved by the Board of Directors of the Company.

17. The Service has the status of an independent structural unit, has sufficient resources to effectively perform its duties.

18. The head and employees of the Service are provided with continuous professional development through participation in training events conducted by authorized state bodies and professional organizations in the field of compliance.

19. The Service is not responsible for the results and decisions of the Management Board, Board of Directors, committees (commissions, working groups) of the Company (except in cases when their decisions were made on the recommendations of the Service), as well as for the untimeliness, reliability and completeness of information, information and documents provided by employees of the Company, including officials for acceptance by the Service solutions, including in the field of financial monitoring.

### Chapter 3. Goals, principles, tasks and functions of the Service

20. The main objective of the Service's activities is the development and implementation within the Company of an effective compliance program, monitoring of compliance risk management, ensuring the Company's and its employees' compliance with the requirements of the legislation of the Republic of Kazakhstan on anti-corruption, anti-money laundering, counter-terrorist financing and countering the financing of the proliferation of weapons of mass destruction (hereinafter – AML/CFT/CPF), the Company's anti-bribery management system, as well as the performance of other functions stipulated by the requirements of the legislation of the Republic of Kazakhstan.

21. When implementing and implementing compliance control and anti-corruption compliance functions in the Company, the Service is guided by the following principles:

1) sufficient authority and resources required to perform the functions and tasks of the Service;

2) the interest of the authorized bodies of the Company in the effectiveness of compliance control and anti-corruption compliance;

3) information openness of the Service's activities;

4) independence of the Service;

5) continuity of compliance control and anti-corruption compliance in the Company;

6) improving compliance control and anti-corruption compliance;

7) regularity of corruption risk assessment;

8) continuous improvement of the competencies of the head and employees of the Service.

22. The main objectives and functions of the Service are:

**Objective 1.** Organization and conduct of AML/CFT/CPF activities in the Company's activities in accordance with the procedure established by the legislation of the Republic of Kazakhstan and the Company's IRD.

**Functions:**

1) development of a set of measures to control compliance risk and implement the AML/CFT/CPF program in accordance with the requirements of the legislation of the Republic of Kazakhstan on AML/CFT/CPF;

2) the adoption of necessary measures to prevent or minimize the risk of the Company, its officials, and employees being involved in the processes of legalization (laundering) of proceeds of crime, financing of terrorism and financing of the proliferation of weapons of mass destruction (hereinafter – ML/TF/CPF);

3) maintaining the effectiveness of the Company's internal control system at a level sufficient to manage ML/TF/CPF risks and associated risks (operational, reputational, legal);

4) ensuring the development of IRD on AML/CFT/CPF issues (including reports on the degree of exposure of the Company's services/products to ML/TF/CPF risks) and submission for consideration and approval to the Board of Directors of the Company;

5) ensuring timely provision, in accordance with the procedure established by law, to the authorized state body for financial monitoring of information (information) subject to financial monitoring, as well as other information provided for by the legislation of the Republic of Kazakhstan on AML/CFT/CPF;

6) participation in the process of introducing new products and services in the Company by providing opinions/expertise on compliance risks and measures to minimize them;

7) monitoring and control of transactions and transactions subject to financial monitoring arising in the course of the Company's activities and participation in the process of their settlement, as well as monitoring compliance with the rules of internal control on AML/CFT/CPF;

8) provision of consultations and/or opinions to the responsible structural divisions of the Company on requests regarding the compliance of specific actions, operations (transactions) with the requirements of AML/CFT/CPF legislation;

9) implementation of timely formation and provision to responsible structural divisions of the Company of an updated list of organizations and persons related to the financing of terrorism and extremism, as well as a list of organizations and persons related to the financing of the proliferation of weapons of mass destruction;

10) organization of training seminars for employees of the Company aimed at improving skills in the field of AML/CFT/CPF;

11) conducting financial monitoring in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan on AML/CFT/CPF and IRD of the Company.

**Objective 2.** Ensuring and monitoring the implementation of the Compliance Risk Management Policy in the Company in accordance with the requirements of the legislation of the Republic of Kazakhstan, including regulatory legal acts of the authorized state body.

**Functions:**

1) ensuring the construction of a unified effective compliance risk management system within the framework of the Company's general risk management system;

2) development and implementation of a set of measures for identification, assessment and management of compliance risk, as well as its prevention or minimization;

3) ensuring effective interaction between the Company's structural divisions and non-members of the Company's employees to manage compliance risk in the course of their current activities;

4) ensuring the development of a IRD on compliance risk management (including a report on the effectiveness of compliance risk management in the Company) and submitting it for consideration and approval to the Board of Directors of the Company;

5) organization of the internal control system for the Company's compliance risk management process;

6) regular monitoring and monitoring of compliance functions and compliance risks related to compliance with external and internal regulatory documents, including the Company's Corporate Governance Code, to clarify the causes of inconsistencies;

7) monitoring of unofficial information from external and internal sources, if necessary, organization of an internal investigation into corruption offenses or fraud;

8) participation, within its competence, in procedures related to the Company's compliance with the requirements of existing international sanctions using appropriate information systems;

9) conducting, in accordance with the established procedure, a compliance examination of IRD projects of structural divisions and employees of the Company not included in them in order to identify and prevent compliance risks for compliance with the requirements of the current legislation of the Republic of Kazakhstan and the Company's internal procedures for managing and minimizing compliance risk;

10) conducting, in accordance with the established procedure, a compliance examination of materials on insurance, reinsurance and guarantee payments to control compliance risks and the implementation of AML/CFT/CPF programs and the presence of signs of insurance fraud;

11) monitoring and analysis of changes in the legislation of the Republic of Kazakhstan;

12) accounting of affiliated persons, identification of affiliated persons for planned/potential transactions, followed by notification of the initiator of the transaction in order for the latter to take measures provided for by the legislation of the Republic of Kazakhstan on joint stock companies;

13) monitoring of available information to determine the effectiveness of the established compliance risk management systems and the maturity of the internal control system, including based on the results of inspections conducted by authorized government agencies;

14) conducting an analysis of the exposure of the Company's key business processes to compliance risks, including corruption, regulatory, reputational, operational risks within the competence and preparing recommendations for improving and developing the Company's processes in order to minimize compliance risks;

15) monitoring the implementation of measures aimed at minimizing/eliminating compliance risks identified by the results of compliance audits;

16) advising the Company's officials and employees on the laws, rules and standards applicable to the Company and related to compliance risk management, including the latest changes to them.

**Objective 3.** Ensuring the Company's and its employees' compliance with the legislation of the Republic of Kazakhstan on anti-corruption, the requirements of the anti-bribery management system, as well as the analysis and monitoring of the implementation of anti-corruption measures.

**Functions:**

1) ensuring the development and submission for consideration and approval to the Board of Directors of the Company:

The Company's internal anti-corruption policy;

the internal policy of identifying and resolving conflicts of interest in the Company;

anti-corruption standard, in accordance with anti-corruption legislation;

a document regulating the procedure for informing employees of the Company about facts or possible violations of anti-corruption legislation;

2) collecting, processing, summarizing, analyzing and evaluating information related to the effectiveness of anti-corruption policy in the Company;

3) conducting anti-corruption monitoring in the Company's activities;

4) coordinating the conduct of an internal analysis of corruption risks in the Company's operations in accordance with the Company's Rules on Identification, Assessment and Analysis of Corruption Risks;

5) participation in an external analysis of corruption risks in the Company's activities, conducted by a joint decision of the first heads of the authorized state anti-corruption body and the Company;

6) monitoring of identified corruption risks in the Company and measures taken to mitigate and eliminate them, as well as submitting the results of monitoring to the Board of Directors of the Company;

7) conducting awareness-raising activities on anti-corruption issues and the formation of an anti-corruption culture in the Company;

8) organization of anti-corruption training seminars for the Company's employees;

9) ensuring control over compliance by the Company's employees with the Company's IRD on anti-corruption issues;

10) monitoring compliance by persons performing managerial functions in the Company with financial control measures and anti-corruption restrictions established by the legislation of the Republic of Kazakhstan on combating corruption, within the competence of the Service;

11) taking measures to identify, monitor and resolve conflicts of interest, including in matters of employment, procurement and other business processes of the Company;

12) taking measures to resolve issues of giving and receiving gifts in the Company;

13) implementation of a comprehensive audit of the reliability of the Company's counterparties;

14) conducting official investigations based on appeals (complaints) about corruption or fraud in the Company and/or participation in them;

15) monitoring and analyzing changes in anti-corruption legislation;

16) conducting an assessment of the effectiveness of control procedures to combat corruption and fraud in the Company;

17) hearing information from structural divisions and non-members of the Company's employees on anti-corruption issues;

18) making recommendations to the authorized bodies of the Company on eliminating identified corruption risks, improving the efficiency of internal processes of organizing the Company's activities;

19) interaction with the authorized state anti-corruption body and other state bodies, quasi-public sector entities, public associations, as well as other individuals and legal entities within the competence of the Anti-Corruption Service;

20) consideration of incoming requests via the hotline on issues within the competence of the Service, conducting inspections on incoming requests;

21) organization of internal and external communication/informing employees of the Company on the functioning of the hotline;

22) collecting, summarizing and analyzing information on issues within the competence of the Service in order to make recommendations to structural divisions and employees of the Company not included in them in order to prevent corruption, compliance risks, abuse and theft of material and monetary assets of the Company;

23) ensuring that the Board of Directors of the Company is provided with regular reports on the measures taken to prevent corruption;

24) organizing and carrying out activities for the development, implementation, maintenance, analysis and improvement of the Anti-Bribery Management System in accordance with ISO 37001:2016 “Anti-Bribery Management Systems” (hereinafter – ABMS, the Standard), including through:

developing policies and procedures for the implementation, maintenance and continual improvement of the ABMS;

providing consultations to the Company’s employees regarding the ABMS and anti-corruption matters;

conducting monitoring and analysis of the ABMS;

ensuring the ABMS compliance with the requirements of the legislation of the Republic of Kazakhstan, the Company’s IRDs, and the Standard;

submitting reports on the functioning of the ABMS to the Company’s authorized bodies;

defining and communicating to the Company’s employees their duties and authorities within the ABMS to ensure effective management;

identifying training and professional development needs of the Company’s employees in the area of the ABMS;

identifying, monitoring and assessing corruption risks, analyzing the causes of corruption risks, forming and updating the corruption and fraud risk map and matrix;

organizing the development, updating and submission for approval of ABMS objectives;

organizing and coordinating the conduct of external certified (inspection) audits of the ABMS;

organizing and coordinating the conduct of periodic internal audits of the ABMS in accordance with the Company’s IRD requirements;

25) performing other functions assigned to the Service on behalf of the Board of Directors of the Company.

23. The Service performs other tasks and functions in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Internal Revenue Service of the Company, decisions of the Sole Shareholder, the Board of Directors of the Company.

#### **Chapter 4. Rights and obligations of the Service**

26. The Service carries out its current work taking into account the main tasks and functions provided for in Chapter 3 of these Regulations.

27. In the performance of assigned tasks and functions, the Service has the right to:

1) request and receive from employees and heads of structural divisions and non-employees of the Company any information and materials, including those constituting commercial and other legally protected secrets necessary for the performance of compliance control functions, oral and written explanations on issues arising during compliance control, including within the framework of procedures in the field of AML/CFT/CPF and anti-corruption;

2) initiate the submission of issues related to the competence of the Service for consideration by the Management Board of the Company and the Board of Directors of the Company;

3) to require employees and heads of structural divisions and non-employees of the Company to provide the necessary documents, including administrative, accounting, draft documents submitted

for approval by the Sole Shareholder, the Board of Directors, the executive body of the Company, as well as orders/protocols of the specified authorized bodies of the Company in order to manage compliance risk;

4) to require employees and heads of structural divisions and non-employees of the Company to eliminate the revealed facts of violations of the legislation of the Republic of Kazakhstan and the internal revenue of the Company, entailing compliance risks for the Company;

5) have direct and unhindered access to members of the authorized bodies of the Company or their committees, any employee of the Company in order to conduct consultations, discuss and/or resolve issues within the competence of the Service;

6) inform the Management Board and/or the Board of Directors of the Company about the ongoing compliance risk management measures, as well as about the identified inconsistencies and violations of the legislation of the Republic of Kazakhstan, the Company's internal revenue, committed by structural divisions and employees of the Company;

7) make proposals to the Management Board of the Company and (or) the Board of Directors of the Company on improving the effectiveness of compliance risk management measures in the Company;

8) to conduct a compliance audit (inspections) independently, as well as jointly with other structural divisions of the Company and (or) employees who are not part of them, in accordance with the procedure determined by the IRDs of the Company;

9) freely express and disclose the results of compliance audits to the Management Board of the Company and the Board of Directors of the Company;

10) gain access to any files, reports, information systems of the Company in order to perform their functional duties, including information and information constituting commercial and other legally protected secrets of the Company;

11) conduct internal audits independently or jointly with structural divisions or employees and (or) officials of the Company who are not part of them on the facts of violations by employees of the Company of the legislation of the Republic of Kazakhstan, the Internal Revenue Service of the Company, legislation of foreign states affecting the Company's activities, as well as on issues related to the consideration of appeals from individuals and legal entities about possible corruption violations of the legislation of the Republic of Kazakhstan on combating corruption received through the hotline;

12) require employees and heads of structural divisions and non-employees of the Company to submit written explanations within the framework of ongoing official investigations;

13) organize and hold meetings on issues within the competence of the Service, create working groups, including with the participation of representatives of the Company, to implement the main tasks within the competence, including in the field of implementing anti-corruption policies;

14) take part in forums, meetings, conferences, exhibitions and seminars, and other events on issues related to the activities of the Service;

15) correspond with the Sole Shareholder, government agencies, legal entities and individuals within the competence of the Service on the basis of a power of attorney issued to the Head of the Service;

16) develop proposals for improving the anti-corruption legislation of the Republic of Kazakhstan and send them to the authorized state anti-corruption body;

17) participate in the development of IRD projects of the Company within its competence;

18) create information channels for informing employees and clients of the Company about the facts of the existence or potential possibility of violation of anti-corruption legislation in the Company, or making proposals to improve the effectiveness of anti-corruption measures in the Company;

19) participate in meetings, meetings, working groups, meetings, meetings and other events held in the Company on issues related to the competence of the Service;

20) make proposals on bringing to justice employees and (or) officials of the Company guilty of non-compliance with the requirements of the legislation of the Republic of Kazakhstan and the Internal revenue of the Company;

21) refuse to approve or coordinate documents with comments, in case they do not comply with the current legislation of the Republic of Kazakhstan, the Internal Revenue Service of the Company, the legislation of foreign countries influencing the Company's activities;

22) exercise other rights that do not contradict the legislation of the Republic of Kazakhstan, the Charter of the Company and this Regulation.

28. When performing the tasks and functions assigned to it, the Service is obliged to:

1) perform the tasks and functions of the Service in a timely manner and at the proper level;

2) execute the decisions and (or) instructions of the committees and the Board of Directors of the Company, the Sole Shareholder of the Company, properly and within the prescribed time;

3) promptly inform the Board of Directors of the Company of all identified deficiencies and violations related to the presence or potential violation of the laws of the Republic of Kazakhstan in the implementation of its tasks and functions for compliance risk management, including the implementation of AML/CFT/CPF and anti-corruption procedures;

4) participate in the preparation and implementation of programs and projects of the Company in the areas of activity of the Service;

5) analyze and manage compliance risks related to the activities of the Service;

6) respect the confidentiality of information about the Company and its affiliates, insider information that became known during the performance of the functions of the Service, if it does not contain data on an upcoming and (or) committed corruption offense;

7) ensure the confidentiality of persons who have applied for alleged or actual facts of corruption, violations of corporate or business ethics and other IRD on anti-corruption issues in the Company;

8) bring to the attention of the authorized state anti-corruption body about cases of corruption offenses that have become known, are being prepared, committed or committed;

9) observe business and professional ethics.

29. The Service may carry out other duties defined by the current legislation of the Republic of Kazakhstan and the IRD of the Company.

30. If the employees of the Service do not have sufficient (collective) knowledge and skills to carry out compliance verification, internal analysis of corruption risks, the Service has the right, in accordance with the established procedure, to organize the involvement of consultants and/or the use of outsourcing (co-sourcing) in compliance verification.

31. The Service informs the relevant Committee of the Board of Directors and/or the Board of Directors of the Company about problems, violations and/or restrictions that prevent the Compliance Service from independently, objectively, effectively, timely and/or fully fulfilling the assigned tasks, the work plan of the Service, in order to resolve such problems and/or eliminate restrictions.

## **Chapter 5. Service Reporting**

32. The Service carries out its activities on the basis of the annual work plan (compliance program) of the Service, approved by the Board of Directors of the Company.

33. Annually, by December 31, the Service develops an annual work plan (compliance program) for the next reporting year, approved by the Board of Directors of the Company.

34. The Service ensures the execution of the work plan (compliance program) and provides quarterly reports on its activities to the Board of Directors of the Company.

35. Reports on the activities of the Service are preliminarily reviewed and approved by the relevant Committee under the Board of Directors of the Company in order to develop recommendations for the Board of Directors of the Company.

36. The report should include information on the main results of the Service's work and recommendations for the Company's activities. It should contain objective and complete information to provide an opportunity to get acquainted with the results of the work of the Service.

37. The Service sends quarterly information on the anti-corruption measures taken in the Company to the Sole Shareholder and (or) the authorized state anti-corruption body.

At the request of the authorized state anti-corruption body, additional information is sent on the anti-corruption measures taken in the Company.

38. In case of possible corruption offenses on the part of the Company's officials, the Service takes measures in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan on combating corruption.

## **Chapter 6. Interaction of the Service with authorized bodies of the Company and other persons**

39. These Regulations come into force from the date of its approval by the Board of Directors of the Company.

40. Amendments and additions to these Regulations shall be made in accordance with the procedure provided for by the IRDs of the Company.

41. If, as a result of changes in the legislation of the Republic of Kazakhstan, or the Company's IRDs, certain provisions of this Regulation come into conflict with them, these norms become invalid until changes are made to the Regulation, in this case, the persons to whom this Regulation applies are guided by the current legislation of the Republic of Kazakhstan.

## **Chapter 7. Responsibility of the Service**

42. The Service is responsible for the timely and high-quality performance of its assigned functions and tasks.

43. The Head of the Service, in accordance with the established procedure, is personally responsible for the quality and timeliness of the performance of functions and tasks assigned to the Service, in accordance with this Regulation, the legislation of the Republic of Kazakhstan, the IRD of the Company, the employment contract, job description. During his absence, the responsibility for fulfilling the requirements of the Regulation rests with the person replacing him.

44. Employees of the Service, in accordance with the established procedure, are personally responsible for the quality and timeliness of the performance of their assigned functions, in accordance with job descriptions, employment contracts and the legislation of the Republic of Kazakhstan, as well as for compliance with the requirements of the Company's IRD, regulating the activities of the Service.

45. The Head of the Service is responsible for timely provision to the Management Board, the Board of Directors of the Company of information, information, reports defined by this Regulation and other internal revenue of the Company.

46. Employees of the Service are obliged to inform the head of the Service in a timely manner about any situations related to the presence or potential possibility of violation of the independence and/or objectivity of the work of the Service.

47. For violation of labor discipline, non-fulfillment or improper fulfillment of assigned labor duties, disciplinary penalties are applied to the head and employees of the Service by decision of the Board of Directors of the Company on the terms and in accordance with the procedure established by the labor legislation of the Republic of Kazakhstan, this Regulation and the Internal Revenue Service of the Company.

## **Chapter 8. Final provisions**

48. These Regulations come into force from the date of its approval by the Board of Directors of the Company.

49. Amendments and additions to these Regulations shall be made in accordance with the procedure provided for by the IRDs of the Company.

50. If, as a result of changes in the legislation of the Republic of Kazakhstan or the Company's internal revenue, certain provisions of this Regulation come into conflict with them, these norms become invalid, and until changes are made to the Regulation, the Service employees are guided by the current legislation of the Republic of Kazakhstan and the Company's Charter.

51. Issues not regulated by this Regulation are regulated by the legislation of the Republic of Kazakhstan, the Charter of the Company and other internal revenue of the Company.

## **Job Description The Head of the Compliance Service**

### **Chapter 1. General provisions**

1. This job description of the Head of the Compliance Service of Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Company) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Company's Charter, the Regulations on Compliance Service (hereinafter referred to as the Service) is approved by the Board of Directors of the Company and other internal documents of the Company.

2. The Head of the Service is appointed to the position on the basis of competitive selection in accordance with the internal document of the Company and is dismissed by order of the Chairman of the Management Board of the Company on the basis of a decision of the Board of Directors of the Company. The Head of the Service is accountable to the Board of Directors of the Company.

3. In his work, the Head of the Service is guided by the legislative and regulatory legal acts of the Republic of Kazakhstan, the Charter of the Company, decisions of the collegial bodies of the Company, internal regulatory documents of the Company (hereinafter – IRD), the Regulations on the Service, as well as this job description.

### **Chapter 2. Qualification requirements**

4. The following qualification requirements are established for the Head of the Service:

- 1) higher (or postgraduate) economic and/or legal education;
- 2) work experience in the field of activity in financial organizations for at least 5 (five) years and (or) in an insurance (reinsurance) organization, a mutual insurance company and a branch of an insurance (reinsurance) organization that is a non-resident of the Republic of Kazakhstan and (or) an insurance broker, a branch of an insurance broker that is a non-resident of the Republic of Kazakhstan (except for work experience in positions of technical or support staff) for at least 1 (one) year or at least 2 (two) years of work experience in the field of AML/CFT/CPF, or at least 3 (three) years of work experience in the provision and (or) regulation of financial services;
- 3) work experience as a manager for at least 1 (one) year;
- 4) knowledge of international, legislative and other regulatory legal acts of the Republic of Kazakhstan regulating the Company's activities, as well as the issues related to the prevention of legalization (laundering) of proceeds of crime, financing of terrorism, and financing of the proliferation of weapons of mass destruction.

5. It is not allowed to appoint a person to the post of Head of the Service who has not been removed or not repaid in accordance with the procedure established by law for crimes committed in the field of economic activity, for corruption and other crimes against the interests of the civil service or public administration, crimes against the foundations of the constitutional system and the security of the state.

### **Chapter 3. Functions and job responsibilities**

6. The Head of the Service shall perform the following functions and duties:

- 1) develops a set of measures to control compliance risk and implement the AML/CFT/CPF program in accordance with the requirements of the legislation of the Republic of Kazakhstan on AML/CFT/CPF;

2) taking necessary measures to prevent or minimize the risk of the Company, its officials, and employees being involved in the processes of legalization (laundering) of proceeds of crime, financing of terrorism, and financing of the proliferation of weapons of mass destruction (hereinafter – ML/TF/CPF);

3) supports the effectiveness of the Company's internal control system at a level sufficient to manage ML/TF/CPF risks and associated risks (operational, reputational, legal);

4) ensures timely provision, in accordance with the procedure established by law, to the authorized state body for financial monitoring of information (information) subject to financial monitoring, as well as other information provided for by the legislation of the Republic of Kazakhstan on AML/CFT/CPF;

5) participates in the process of introducing new products and services in the Company by providing opinions/expertise on compliance risks and measures to minimize them;

6) monitors and controls transactions and transactions subject to financial monitoring that arise in the course of the Company's activities and participate in the process of their settlement, as well as monitoring compliance with the rules of internal control on AML/CFT/CPF;

7) provides the responsible structural divisions of the Company with consultations and/or conclusions on requests regarding the compliance of specific actions, operations (transactions) with the requirements of legislation in the field of AML/CFT/CPF;

8) carries out the timely formation and provision to the responsible structural divisions of the Company of an updated list of organizations and persons associated with the financing of terrorism and extremism, as well as a list of organizations and persons associated with the financing of the proliferation of weapons of mass destruction;

9) organizes training seminars for employees of the Company aimed at improving skills in the field of AML/CFT/CPF;

10) conducts financial monitoring in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan on AML/CFT/CPF and IRD of the Company;

11) ensures the construction of a unified effective compliance risk management system within the framework of the Company's overall risk management system;

12) develops and implements a set of measures for the identification, assessment and management of compliance risk, as well as its prevention or minimization;

13) ensures effective interaction of the Company's structural divisions and non-members of the Company's employees to manage compliance risk in the course of their current activities;

14) organizes an internal control system for the Company's compliance risk management process;

15) controls and monitors compliance functions and compliance risks related to compliance with external and internal regulatory documents, including the Company's Corporate Governance Code, to clarify the causes of inconsistencies;

16) monitors unofficial information from external and internal sources, and, if necessary, organizes an internal investigation into corruption offenses or fraud;

17) participates, within its competence, in procedures related to the Company's compliance with the requirements of existing international sanctions using appropriate information systems;

18) conducts, in accordance with the established procedure, a compliance examination of IRD projects of structural divisions and employees of the Company who are not part of them in order to identify and prevent compliance risks for compliance with the requirements of the current legislation of the Republic of Kazakhstan and the Company's internal procedures for managing and minimizing compliance risk;

19) conducts, in accordance with the established procedure, a compliance examination of materials on insurance, reinsurance and guarantee payments for the control of compliance risks and the implementation of AML/CFT/CPF programs and the presence of signs of insurance fraud;

20) conducts monitoring and analysis of changes in the legislation of the Republic of Kazakhstan;

21) carries out accounting of affiliated persons, identification of affiliated persons for planned/potential transactions with subsequent notification of the initiator of the transaction in order for the latter to take measures provided for by the legislation of the Republic of Kazakhstan on joint stock companies;

22) monitors the available information to determine the effectiveness of the established compliance risk management systems and the maturity of the internal control system, including based on the results of inspections conducted by authorized government agencies;

23) analyzes the exposure of the Company's key business processes to compliance risks, including corruption, regulatory, reputational, and operational risks within its competence and prepares recommendations for improving and developing the Company's processes in order to minimize compliance risks;

24) monitors the implementation of measures aimed at minimizing/eliminating compliance risks identified by the results of compliance audits;

25) advises the Company's officials and employees on the laws, rules and standards applicable to the Company and related to compliance risk management, including the latest changes to them;

26) ensuring the development and submission for review and approval by the Company's Board of Directors of IRDs on anti-corruption, the Anti-Bribery Management System, AML/CFT/CPF, and compliance risk management;

27) collects, processes, summarizes, analyzes and evaluates information related to the effectiveness of anti-corruption policy in the Company;

28) conducts anti-corruption monitoring in the Company's activities;

29) coordinating the conduct of an internal analysis of corruption risks in the Company's operations in accordance with the Company's Rules on Identification, Assessment and Analysis of Corruption Risks;

30) participates in an external analysis of corruption risks in the Company's activities, conducted by a joint decision of the first heads of the authorized state anti-corruption body and the Company;

31) monitors identified corruption risks in the Company and takes measures to mitigate and eliminate them, as well as submits the results of monitoring to the Board of Directors of the Company;

31-1) organizing and carrying out activities for the development, implementation, maintenance, analysis and improvement of the Anti-Bribery Management System in accordance with ISO 37001:2016 "Anti-Bribery Management Systems" (hereinafter – ABMS, the Standard), including through:

developing policies and procedures for the implementation, maintenance and continual improvement of the ABMS;

providing consultations to the Company's employees regarding the ABMS and anti-corruption matters;

conducting monitoring and analysis of the ABMS;

ensuring the ABMS compliance with the requirements of the legislation of the Republic of Kazakhstan, the Company's IRDs, and the Standard;

submitting reports on the functioning of the ABMS to the Company's authorized bodies;

defining and communicating to the Company's employees their duties and authorities within the ABMS to ensure effective management;

identifying training and professional development needs of the Company's employees in the area of the ABMS;

identifying, monitoring and assessing corruption risks, analyzing the causes of corruption risks, forming and updating the corruption and fraud risk map and matrix;

organizing the development, updating and submission for approval of ABMS objectives;

organizing and coordinating the conduct of external certified (inspection) audits of the ABMS;

organizing and coordinating the conduct of periodic internal audits of the ABMS in accordance with the Company's IRD requirements;

- 32) conducts awareness-raising activities on anti-corruption issues and the formation of an anti-corruption culture in the Company;
- 33) organizes anti-corruption training seminars for the Company's employees;
- 34) ensures control over compliance by the Company's employees with the Company's IRD on anti-corruption issues;
- 35) monitors compliance by persons performing managerial functions in the Company with financial control measures and anti-corruption restrictions established by the legislation of the Republic of Kazakhstan on combating corruption, within the competence of the Service;
- 36) Takes measures to identify, monitor and resolve conflicts of interest, including in matters of employment, procurement and other business processes of the Company;
- 37) takes measures to resolve issues of giving and receiving gifts in the Company;
- 38) performs a comprehensive audit of the reliability of the Company's counterparties;
- 39) conducts internal investigations based on appeals (complaints) about corruption or fraud in the Company and/or participation in them;
- 40) conducts monitoring and analysis of changes in anti-corruption legislation;
- 41) evaluates the effectiveness of control procedures to combat corruption and fraud in the Company;
- 42) hears information from structural divisions and non-members of the Company's employees on anti-corruption issues;
- 43) makes recommendations to the authorized bodies of the Company on eliminating identified corruption risks, improving the efficiency of internal processes of organizing the Company's activities;
- 44) interacts with the authorized state anti-corruption body and other state bodies, quasi-public sector entities, public associations, as well as other individuals and legal entities within the competence of the Anti-Corruption Service;
- 45) considers incoming requests via the hotline on issues within the competence of the Service, conducting inspections on incoming requests;
- 46) organizes internal and external communications/informing employees of the Company on the functioning of the hotline;
- 47) collects, summarizes and analyzes information on issues within the competence of the Service in order to make recommendations to structural divisions and employees of the Company not included in them in order to prevent corruption, compliance risks, abuse and theft of material and monetary assets of the Company;
- 48) ensures that the Board of Directors of the Company is provided with regular reports on the measures taken to prevent corruption.

#### **Chapter 4. Rights and powers**

7. The Head of the Service has the following rights and powers:
  - 1) to request and get acquainted with the documentation, materials necessary for the performance of the functions assigned to him within his competence and in accordance with the procedure provided for by the Internal Revenue Service of the Company;
  - 2) involve, with the consent of the heads of the Company's structural divisions, their employees for the preparation of projects' IRDs and other documents, as well as for the development and implementation of activities carried out within the framework of tasks within the competence of the Service;
  - 3) represent the Company in government agencies and other organizations within its competence;
  - 4) to gain access to the technical means and information resources of the Company necessary for the performance of its functional duties, in accordance with the IRDs of the Company;
  - 5) improve their skills at seminars or courses held in accordance with the procedures established by the Company's Internal Revenue Service;

6) to submit for consideration proposals on improving/optimizing the work of the Service, interaction with other structural divisions and employees outside them, as well as on improving the work of the Company as a whole;

7) provide consultations, clarifications and recommendations on issues within the competence of the Service;

8) conduct training seminars/presentations for employees of the Company on issues related to the competence of the Service;

9) by agreement, participate in working groups and collegial bodies of the Company within the competence of the Service, including through direct membership in them, as well as participate in events, conferences, meetings, seminars on issues within the competence of the Service;

10) participate in the implementation of new systems, automation of business processes, within the competence of the Service;

11) have other rights provided for by the legislation of the Republic of Kazakhstan and the IRDs of the Company.

## **Chapter 5. Responsibility**

8. The Head of the Service is responsible for:

1) improper (untimely and/or substandard) fulfillment of the goals and objectives of the activity set for the Service – within the limits defined by the current legislation of the Republic of Kazakhstan and the employment contract;

2) improper (untimely and/or substandard) performance or non-performance of their functions and official duties specified in Chapters 3.4 of this job description, as well as orders and orders of management, non-compliance with labor and performance discipline, rules and norms on labor protection established by the relevant regulatory legal acts of the Republic of Kazakhstan, the Company's IRDs;

3) non-compliance with official, commercial, banking and other secrets protected by law – within the limits defined by the current legislation of the Republic of Kazakhstan and the employment contract;

4) causing damage (harm) – within the limits defined by the current legislation of the Republic of Kazakhstan and the employment contract;

5) offenses committed in the course of carrying out their activities - within the limits defined by the current administrative, criminal and civil legislation of the Republic of Kazakhstan;

6) observance of labor discipline;

7) compliance with the ABMS requirements and the Company's Anti-Corruption Policy.

## **Chapter 6. Interchangeability**

9. The head of the Service and the employee of the Service carry out activities on the principle of interchangeability during the temporary absence of one of them for reasons of illness, being on a business trip or vacation, as well as for other reasons.

## **Job Description The Chief Compliance Officer**

### **Chapter 1. General provisions**

1. This job description of the Chief Compliance Controller of the Compliance Service of Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Company) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter of the Company and the Regulations on Compliance Service (hereinafter referred to as the Service).

2. The Chief Compliance Controller of the Compliance Service (hereinafter referred to as the Chief Compliance Controller) is appointed to the position on the basis of competitive selection in accordance with the internal document of the Company and is dismissed by order of the Chairman of the Management Board of the Company on the basis of a decision of the Board of Directors of the Company. The Chief Compliance Officer reports directly to the Head of the Service (hereinafter referred to as the direct supervisor).

3. In his work, the Chief Compliance Controller is guided by the legislative and regulatory legal acts of the Republic of Kazakhstan, the Company's Charter, decisions of the Company's collegial bodies, internal regulatory documents of the Company (hereinafter - IRDs), the Regulations on Service, as well as this job description.

### **Chapter 2. Qualification requirements**

4. The following qualification requirements are established for the Chief Compliance Controller:

- 1) higher (or postgraduate) economic and/or legal education;
- 2) at least 2 (two) years of experience in the field of activity in financial organizations years or work experience in the field of AML/CFT/CPF for at least 1 (one) year, or work experience in the provision and (or) regulation of financial services for at least 1 (one) year;
- 3) knowledge of international, legislative and other regulatory legal acts of the Republic of Kazakhstan regulating the Company's activities, as well as the issues related to the prevention of legalization (laundering) of proceeds of crime, financing of terrorism, and financing of the proliferation of weapons of mass destruction.

5. It is not allowed to appoint a person to the post of Chief Compliance Controller who has a criminal record that has not been removed or extinguished in accordance with the procedure established by law for crimes committed in the field of economic activity, for corruption and other crimes against the interests of the civil service or public administration, crimes against the foundations of the constitutional order and state security.

### **Chapter 3. Functions and job responsibilities:**

6. The Chief Compliance Officer of the Compliance Service shall perform the following functions and duties:

- 1) carry out the work carried out within the framework of the assigned tasks and functions of the Service in a timely, high-quality and in full;
- 2) execute the decisions of the Board of Directors of the Company and the instructions of the direct head of the Service properly and within the prescribed period;

3) develop and make proposals for the adoption and improvement of the Company's Internal Revenue Code, participate in the coordination of IRDs projects developed by other structural divisions and non-members of the Company's employees on issues within the competence of the Service;

4) participate in the preparation and implementation of the Company's programs and projects in the areas of its activities;

5) inform the Management Board and (or) the Board of Directors of the Company about the identified inconsistencies and violations of the legislation of the Republic of Kazakhstan, the internal revenue of the Company, committed by structural divisions and employees of the Company;

6) strictly comply with the requirements of the current regulatory legal acts of the Republic of Kazakhstan, the Company's Internal Revenue Service, internal labor regulations, business ethics and internal procedures of the Company;

7) observe performance and work discipline;

8) comply with official, commercial, banking and other legally protected secrets, requirements for safety and labor protection, fire safety and industrial sanitation in the workplace;

9) analyze and manage compliance risks related to the activities of the Service;

10) promptly (within 3 (three) working days from the date of the event) inform the Company about all changes that have occurred in the information requested during employment (changes in personal data, including last name/first name / patronymic, address, phone number, receipt of a new identity card / passport, receipt of higher/additional education education, academic degree, etc.), by submitting relevant documents;

11) conduct regular monitoring and monitoring of compliance functions and compliance risks related to compliance with external and internal regulatory documents, including the Company's Corporate Governance Code, to clarify the causes of inconsistencies;

12) monitor unofficial information from external and internal sources, if necessary, organize an internal investigation into corruption offenses or fraud;

13) carry out compliance examinations of materials on insurance, reinsurance and guarantee payments in accordance with the established procedure to control compliance risks and the implementation of AML/CFT/CPF programs and the presence of signs of insurance fraud;

14) conducts, in accordance with the established procedure, a compliance examination of IRD of projects of structural divisions and employees of the Company not included in them in order to identify and prevent compliance risks for compliance with the requirements of the current legislation of the Republic of Kazakhstan and the Company's internal procedures for managing and minimizing compliance risk;

15) conduct compliance checks of processes affecting the implementation of the Company's compliance risks;

16) carry out verification of the Company's counterparties and clients for reliability in accordance with the procedure provided for in the Company's internal documents.

#### **Chapter 4. Rights and powers**

7. The Chief Compliance Officer has the following rights and powers:

1) to request and get acquainted with the documentation, materials necessary for the performance of the functions assigned to him within his competence and in accordance with the procedure provided for by the Internal Revenue Service of the Company;

2) involve, with the consent of the heads of the Company's structural divisions, their employees for the preparation of projects' IRDs and other documents, as well as for the development and implementation of activities carried out within the framework of tasks within the competence of the Service;

3) represent the Company in government agencies and other organizations within its competence;

- 4) to gain access to the technical means and information resources of the Company necessary for the performance of its functional duties, in accordance with the IRDs of the Company;
- 5) improve their skills at seminars or courses held in accordance with the procedures established by the Company's Internal Revenue Service;
- 6) submit proposals for improving/optimizing the work of the Service, interaction with other structural units, as well as improving the work of the Company as a whole;
- 7) provide consultations, clarifications and recommendations on issues within the competence of the Service;
- 8) conduct training seminars/presentations for employees of the Company on issues related to the competence of the Service;
- 9) by agreement, participate in working groups and collegial bodies of the Company within the competence of the Service, including through direct membership in them, as well as participate in events, conferences, meetings, seminars on issues within the competence of the Service;
- 10) participate in the implementation of new systems, automation of business processes, within the competence of the Service;
- 11) have other rights provided for by the legislation of the Republic of Kazakhstan and internal documents of the Company.

## **Chapter 5. Responsibility**

8. The Chief Compliance Officer is responsible for:

- 1) improper (untimely and/or substandard) performance or non-performance of their functions and official duties specified in Chapters 3.4 of this job description, as well as orders and orders of management, non-compliance with labor and performance discipline, rules and norms on labor protection established by relevant regulatory legal acts of the Republic of Kazakhstan, internal documents of the Company;
- 2) non-compliance with official, commercial, banking and other secrets protected by law – within the limits defined by the current legislation of the Republic of Kazakhstan and the employment contract;
- 3) causing damage (harm) – within the limits defined by the current legislation of the Republic of Kazakhstan and the employment contract;
- 4) offenses committed in the course of carrying out their activities – within the limits defined by the current administrative, criminal and civil legislation of the Republic of Kazakhstan;
- 5) compliance with the requirements of the Anti-Bribery Management System and the Company's Anti-Corruption Policy.

## **Chapter 6. Interchangeability**

9. The head of the Service and the employee of the Service carry out activities on the principle of interchangeability during the temporary absence of one of them for reasons of illness, being on a business trip or vacation, as well as for other reasons.