

**Results of anti-corruption monitoring,  
conducted at the KazakhExport EIC JSC for the second quarter of 2023**

**I. Introduction**

1. **Name of the quasi-public sector entity for the activities of which anti-corruption monitoring was carried out:** the KazakhExport EIC JSC (hereinafter referred to as the Company).

2. **Anti-corruption monitoring** was carried out by the Head of the Compliance Service Kabsamatov Kuanysh Akaevich.

Work phone 8 (7172) 95-56-56, extension number 183.

3. **Anti-corruption monitoring period:** from June 20 to June 30, 2023.

4. **Observed period:** from April 01 to June 30, 2023.

**II. Information and analytical part**

**Conducting inspections and audits**

No inspections or audits of the Company carried by state bodies during the observed period.

At the same time, since May 22, the Sole Shareholder of the Company represented by the Baiterek National Management Holding JSC has formed an audit group to conduct an audit, the subject of which is to check the processes of insurance, reinsurance, and underwriting.

The results of this audit are planned to be provided to the Company's Management in July.

**Appeals and publications on cases of corruption or abuse of office**

In the observed period, the Company did not receive written appeals, as well as appeals to the [senim@kazakhexport.kz](mailto:senim@kazakhexport.kz) **and the Senim helpline 8 (7172) 55 44 70**, containing information about abuses or corruption in the actions of officials and employees of the Company, as well as cases of fraudulent actions on their part.

Periodical, television and electronic media (mass media), as well as social networks, did not contain publications, articles, notes mentioning information about cases of fraud in the Company, corruption and abuse of office among its officials and employees.

The total number of mentions of the Company and its activities in social networks and the media for the 2nd quarter of this year amounted to 842 mentions.

Of these: 320 mentions of the Society were in a positive way;

522 were neutral (news reports).

During the monitoring, a written notification received on March 15, 2023 from the Agency of the Republic of Kazakhstan for the Protection of Competition on the presence

of signs of anticompetitive actions in the Company's actions was also studied, namely, that the text of insurance contracts concluded with a number of exporting clients did not include conditions on counter obligations of customers in accordance with Article 27 of the Law of the Republic of Kazakhstan On Industrial Policy.

In the course of the analysis of the terms of previously concluded insurance contracts, it was revealed that there were no conditions on counter obligations for 9 exporting clients.

In particular, according to the Law of the Republic of Kazakhstan On Industrial Policy, the subjects of industrial and innovative activity, when receiving state incentives, should have counter obligations, for example, such as increasing the production of export-oriented goods.

These conditions were absent in the content of the concluded insurance contracts due to shortcomings in the coordination of the text of insurance contracts made by employees of related structural units.

It was noted that the Insurance Department, as responsible for fulfilling the requirements of the Agency for the Protection of Competition claims, took measures to draw up additional agreements to insurance contracts with 9 exporting clients to include conditions on counter obligations.

It should be noted that there are no corruption factors in the actions of officials and employees of the Company, as well as factors to create a privileged position for the latter in the insurance market.

### **Information from legal statistical bodies, international and non-governmental organizations**

As part of the monitoring, documents on claim work carried out by employees of the Legal Support Department during the second quarter, official Internet resources of the Financial Monitoring Agency of the Republic of Kazakhstan, the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service), the Supreme Court of the Republic of Kazakhstan, the Committee of the General Prosecutor's Office of the Republic of Kazakhstan on Special Accounting and Legal Statistics, data of the information and the Kompra reference service were studied.

Anti-corruption monitoring did not find any cases of initiation of criminal cases and criminal prosecution for committing corruption offenses of employees and officials of the Company.

There were no facts of initiation of proceedings against the Company and its officials in cases of administrative corruption offenses.

There were no court proceedings in criminal cases and cases of administrative corruption offenses with the participation of the Company, its employees and officials.

On the Internet resources of international and non-governmental organizations, such as the United Nations, the Eurasian Development Bank, the World Bank, the Transparency International (a non-governmental international organization for combating corruption and researching the level of corruption), the FATF (an

international organization - the Group for the Development of Anti-Money Laundering Measures) there was no mention of corruption in the activities of the Company or the implementation of proceeds of crime legalization operations.

### **Compliance with anti-corruption restrictions and standards**

During the monitoring, there were no cases of non-compliance by officials from among the members of the Management Board and employees of the Company with anti-corruption restrictions and standards provided for by the norms of the Law of the Republic of Kazakhstan On Combating Corruption and the Anti-Corruption Policy in the Company.

At the same time, in the observed period, during the working meetings of the heads of structural divisions and supervising members of the Management Board, written recommendations from the Ministry of National Economy and the audit report of the working group of this department on the results of the audit conducted in the Company in the 1st quarter of this year were taken into account.

Based on the results of the analysis of these documents, in order to minimize possible corruption factors in the future, the following measures were taken:

- 1) by the decision of the Management Board of the Company dated 04/21/2023 (Minutes No. 25) it was decided to abolish the Committee for the consideration of issues related to the payment of bonuses to the employees of the KazakhExport EIC JSC for the development and implementation of measures aimed at saving costs, increasing profitability, as well as introducing innovative solutions and rationalization proposals (Innovation Committee);
- 2) the job descriptions of employees of the Department of Strategy and Economic Planning of the Company enshrine the function of budget control over the expenditure of funds;
- 3) A meeting was held with the Company's employees on the established violations and deficiencies reflected in the audit report of the working group of the Ministry of National Economy in order to prevent them in the future.

### **The presence of a conflict of interest and its settlement**

In the observed period, there were no cases of conflict of interest in the current work of officials and employees of the Company.

### **Formation of an anti-corruption culture**

The Compliance Service and the Human Resources Department conducted internal training in the form of training on the topic Business processes of the company exposed to fraud risks for members of the Management Board and heads of structural divisions.

Also, for all managers and employees of the Company, an online explanation was held with the invitation of an employee of the State Revenue Department of Astana on the second stage of the universal declaration of income of the population in 2023 and

the deadlines for the submission of declarations of established forms by employees of quasi-state organizations and their spouses to the territorial bodies of state revenues.

### **III. Concluding Part**

#### **Conclusions:**

There are no confirmed cases of corruption offenses in the activities of employees and officials of the Company in the observed period.

Anti-corruption restrictions and standards in the current work of the Company's officials and employees are observed.

**Recommendation:** to ensure control over compliance by employees (and their spouses) of the Company with the requirements for the timely submission of declarations as part of the second stage of the universal declaration of income.

**K. Kabsamatov**

**Head of the Compliance Service**