

Results of anti-corruption monitoring, conducted at KazakhExport ESC JSC for the Q4 of 2023

I. The introductory part

1. **The name of the quasi-public sector entity whose activities were subject to anti-corruption monitoring:** KazakhExport ESC JSC (hereinafter referred to as the Company).

2. **Anti-corruption monitoring** was conducted by the Head of the Compliance Service, Assel Zhakayeva, and the Chief Compliance Controller, Bakytzhan Tumenbayev.

Work phone number is 8 (7172) 95-56-56, internal number 155.

3. **The period of anti-corruption monitoring:** from December 20 to December 29, 2023.

4. The **observed period** is from October 1 to December 29, 2023.

II. Information and analytical part

Conducting inspections and audits

No inspections or audits were carried out in relation to the Company by government agencies during the period under review.

At the same time, it should be noted that the Compliance Service of the Company conducted an internal analysis of corruption risks in the activities of three structural divisions of the Company in the period from December 4, 2023 to December 29, 2023.

The results of the internal corruption analysis will be posted for review by all interested parties within 3 (three) working days from the date of approval of the Action Plan on the official website of the Company.

Appeals and publications on cases of corruption or abuse of office

In the period under review, the Company did not receive written appeals, as well as appeals to the **senim@kazakhexport trust email address.kz** and **Senim helpline 8(7172) 55 44 70**, containing information about abuse or corruption in the actions of officials and employees of the Company, as well as cases of fraudulent actions on their part.

Publications, articles, notes mentioning information about cases of fraud in the Company, corruption manifestations and official abuses among its officials and employees were not posted in periodical print, television and electronic media (mass media), as well as social networks.

The total number of mentions of the Company and its activities in social networks and the media for the Q4 of this year amounted to 493 mentions.

Of these, 248 mentions of the Society were in a positive way;
242 were of a neutral nature (informational messages);

3 mentions with a negative tone.

During the monitoring, it was found that 3 mentions with a negative tone related to the written response of the Company published on social networks to the appeal of NMH Baiterek JSC (hereinafter referred to as the Holding) regarding the terms of insurance under new contracts for the product "Insurance of short-term receivables" in relation to the policyholder of ArcelorMittal Temirtau JSC, as well as other issues concerning the operational activities of the Company.

According to the results of studying 3 of these publications, signs indicating corruption factors in the Company's actions are not seen, however, the Information and Communications Department has taken measures to clarify the Company's position on this issue by preparing and sending appropriate comments to the press service of the Holding.

Information from legal statistics bodies, international and non-governmental organizations

As part of the ongoing monitoring, documents on the claim work carried out by employees of the Department of Legal Support during the Q4, official Internet resources of the Agency for Financial Monitoring 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 Prosecutor General's Office of the Republic of Kazakhstan on Special Accounting and Legal Statistics, Kompura call-center.

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

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 on criminal and administrative corruption offenses involving 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, Transparency International (a non-governmental international organization for combating corruption and researching the level of corruption), FATF (an international organization - Group for the development of measures to combat money laundering), there was no mention of manifestations in the activities of the Society corruption or its implementation of operations to legalize proceeds from crime.

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 Anti-Corruption" and the Anti-Corruption Policy in the Company.

No facts of non-compliance with the established anti-corruption restrictions and standards have been established: no mention or information has been revealed about the presence of accounts and deposits in banks located outside the Republic of Kazakhstan by members of the Management Board and employees of the Company, lobbying of personal interests when considering draft transactions concluded by the Company with customers and suppliers of services (goods), collaboration of close relatives and relatives in Society, use for personal purposes and disclosure of confidential information.

There are no cases of hiring persons who have committed corruption crimes as employees of the Company, which is confirmed by the availability of relevant certificates issued by the territorial bodies of the Committee of the Prosecutor General's Office of the Republic of Kazakhstan on Special Accounting and Legal statistics in the electronic personal files of employees formed by the Department of Human Resources Management.

The existence of a conflict of interest and its resolution

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

Formation of an anti-corruption culture

On November 22, 2023, the Company's employees, through online training, were trained on the topic "Legislation of the Republic of Kazakhstan on combating corruption and fraud and the application of its norms in the current activities of the company", within which the Company's employees were informed about regulatory legal acts of the Republic of Kazakhstan aimed at countering corruption offenses and establishing responsibility for their commission, on the subjects of combating fraud, on the most common types of corruption offenses, their signs, ways to prevent them, on incentive measures for reporting a corruption offense, as well as on compliance with anti-corruption legislation within the Company.

III. The final 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 have been observed.

The head of the Compliance Service

A. Zhakayeva

Chief Compliance Officer

B. Tumenbayev