Results of anti-corruption monitoring, conducted at KazakhExport ESC JSC for the first quarter of 2024

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 March 20 to March 29, 2024.

4. The observed period is from January 1 to March 29, 2024.

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 in the period from February 7 to February 29, 2024, the Audit Group of Baiterek NMH JSC conducted an audit to ensure compliance with the legislation of the Republic of Kazakhstan on procurement for the period from January 1, 2021 to December 31, 2023.

Based on the results of the audit, the Company will be provided with an Audit Report 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, and appeals to the **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.

At the same time, it should be noted that the email of the <u>senim@kazakhexport</u> <u>trust.kz</u> On January 9, 2024, an individual's appeal was received against the actions of the brokerage company "Qualify Capital". In the course of clarifying the circumstances, it was established that this appeal is not related to the actions of employees or officials of the Company.

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 1st quarter of this year amounted to 799 mentions.

Of these, 399 mentions of the Society were in a positive way;

The 400 were of a neutral nature.

It should also be noted that on January 10, 2024, the Company received an oral request from Khabar Agency JSC regarding the Company's purchased liability insurance services for Company officials for 2024.

Based on the results of studying the specified oral survey, the Company prepared and provided comments on the specified issue, while the request had no negative consequences for both the Company's activities and for other interested parties.

Information from legal statistics bodies, international and nongovernmental organizations

As part of the ongoing monitoring, documents on the claim work carried out by employees of the Department of Legal Support during the first quarter of this year, official Internet resources of the Agency for Financial Monitoring of the Republic of Kazakhstan, the Anti-Corruption Agency (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 were studied, data from the information and reference service "Kompra".

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

In the 1st quarter of this year, the Company's internal training schedule did not include seminars or trainings on anti-corruption topics.

At the same time, in the period from March 12 to March 14, 2024, employees of the Company's Compliance Service were trained in the course "Methods of conducting official (corporate) fraud investigations".

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

Chief Compliance Officer

B. Tumenbayev

A. Zhakayeva