Results of anti-corruption monitoring, conducted at Export Credit Agency of Kazakhstan JSC for the second quarter of 2024

I. The introductory part

- 1. The name of the quasi-public sector entity whose activities were subject to anti-corruption monitoring: Export Credit Agency of Kazakhstan 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 June 20 to June 28, 2024.
- 4. The **observed period** is from April 1 to June 28, 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 according to the results of the audit conducted by the Audit Group of Baiterek NMH JSC from February 7 to April 29, 2024 for compliance with the legislation of the Republic of Kazakhstan on procurement for the period from January 1, 2021 to December 31, 2023, the Company received an Audit Report of the Company.

Based on the results of the formed Audit Report of the Company, the Action Plan for the implementation of the Audit Act of the Company dated June 12, 2024 (Minutes No. 29/24) was approved.

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 trust email address **senim@kazakhexport.kz** and 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.

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 Q2of this year amounted to 1022 mentions.

Of these, 574 mentions of the Society were in a positive way;

424 were of a neutral nature;

24 publications of a negative tone.

During the monitoring, it was found that 20 mentions with a negative tone related to materials published in the media and social networks about KAZEXPORT LLC, which were mistakenly classified by the monitoring system as belonging to the Company, but actually having nothing to do with the Company.

4 publications with a negative tone concerned quotes from a deputy of the Majilis of the Republic of Kazakhstan criticizing industrial policy in the Republic of Kazakhstan, which provides preferential support for large companies, among which there are also clients of the Company. At the same time, these materials do not contain information indicating corruption factors in the Company's actions, however, on the part of the Information and Communications Department, this information was promptly communicated to the Sole Shareholder and members of the Management Board.

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 Departments of Legal Support and Insurance and Guarantee Payments during the second quarter of this year, official Internet resources of the Agency for Financial Monitoring of the Republic of Kazakhstan, the Agency for Combating Corruption (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, 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 Q2 of this year, employees of the Company, through online training, on May 14, 2024, were trained on the topic "On guarantees of protection and non-prosecution of employees of Export Credit Agency of Kazakhstan JSC and persons reporting information on cases of corruption or fraud in the Company", within which employees The Company was informed about measures to ensure protection against persons reporting violations, including guarantees of non-prosecution in the Company's internal regulatory documents, examples of cases of harassment of employees, ways to report cases of corruption or fraud in the Company, as well as the institute of integrity in accordance with the recommendations of the OECD.

It should be noted that employees of the Compliance Service in the reporting quarter, on April 24, 2024, also took part in a training seminar with the participation of OECD experts on the topic "Anti-corruption compliance in the public and quasi-public sectors" as part of the implementation of the project "Integrity Review".

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