

On the implementation of recommendations made following the results of the internal analysis of corruption risks

Name of the object of corruption risks internal analysis: Export Credit Agency of Kazakhstan Joint-Stock Company (*PR service, Department of Human Resources Management and Operational Activities*)

The internal analysis of corruption risks will be conducted from August 15, 2024 to October 17, 2024.

Date of analytical report signing: November 1, 2024.

Item No.	Recommendation based on the results of corruption risks internal analysis	Completion format according to the action plan	Information on the implementation of the recommendation
1.	According to paragraph 18 of the Instructions on Planning, Storage, distribution of souvenirs and advertising and printing goods of KazakhExport Export Insurance Company JSC, make changes/additions providing for the regulation of issues related to the procedure for storing goods/products within the framework of the Division's activities.	Amendments/additions to the Instructions on planning, storage, distribution of souvenirs and advertising and printing goods of KazakhExport Export Insurance Company JSC	By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 23.01.2025 No. 9, amendments and additions No. 1 were made to the Instructions for planning, storage, distribution of souvenir products and advertising and printing goods of the KazakhExport Export Insurance Company JSC, approved by the decision of the Management Board of the KazakhExport EIC JSC dated March 31, 2023 (minutes No. 18)
2.	The PR service should make changes/additions to the Instructions on planning, storage, distribution of souvenirs and advertising and printing products of KazakhExport Export Insurance Company JSC, providing for the timing or frequency of monitoring the relevance of Products, criteria for "relevance" or "non-relevance" of products, as well as criteria for determining companies used for monitoring the market of purchased products.		
3.	The PR service should update the Instructions on planning, storage, distribution of souvenirs and advertising and printing goods of KazakhExport Export Insurance Company JSC and the Regulations on the Procedure for Managing Reputational Risk and Distributing Information of KazakhExport Export Insurance Company Joint Stock Company, taking into account the changed name of the Company and the changed names of the Company's structural divisions,	Amendments/additions to the Instructions on Planning, Storage, distribution of souvenirs and advertising and printing goods of KazakhExport Export Insurance Company JSC and the Regulations on the Procedure for Managing Reputational Risk and Dissemination of Information of KazakhExport Export Insurance Company Joint Stock Company	By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 23.01.2025 No. 9, amendments and additions No. 1 were made to the Instructions for planning, storage, distribution of souvenirs and advertising and printing goods of the KazakhExport Export Insurance Company JSC, approved by the decision of the Management Board of the KazakhExport EIC JSC dated March 31, 2023 (minutes No. 18).

	in accordance with the current organizational structure of the Company.		By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 13.01.2025 No. 4, amendments and additions No. 2 were made to the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated September 14, 2022 (minutes No. 58).
4.	The PR service should amend paragraph 2) paragraph 33 of the Regulations on the Procedure for Managing Reputational Risk and Disseminating Information of the KazakhExport Export Insurance Company Joint Stock Company regarding the deadline for responding to requests for information not included in official communications, in accordance with the Law of the Republic of Kazakhstan "On Mass Media".	Amendments/additions to the Regulations on the Procedure for Managing Reputational Risk and Dissemination of Information of KazakhExport Export Insurance Company Joint Stock Company	By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 13.01.2025 No. 4, amendments and additions No. 2 were made to the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated September 14, 2022 (minutes No. 58).
5.	The PR service should update the Regulations on the procedure for managing reputational risk and dissemination of Information of the KazakhExport Export Insurance Company Joint Stock Company, taking into account the Law of the Republic of Kazakhstan "On Mass Media" that has become invalid and the Law of the Republic of Kazakhstan "On Mass Media" that has entered into force.		
6.	The PR service should update the Regulations on the Procedure for Managing Reputational Risk and Disseminating Information of the KazakhExport Export Insurance Company Joint Stock Company in terms of changing terms/words that meet the requirements of paragraph 20 of the Instructions for the Development, Coordination, approval of Internal regulatory and Standard Forms of documents of the Export Credit Agency of Kazakhstan JSC.		

7.	The PR Service, together with the interested structural divisions of the Company, should take measures to update the documents posted in the "Corporate Documents" section of the Company's Internet resource.	Sending a memo from the PR service to the interested structural units (hereinafter referred to as the ISU) and responses from the ISU about the need or lack of need to update documents posted in the "Corporate Documents" section of the Company's Internet resource.	PR service memo dated 30.01.2025 No. 645-BH reports that the PR service, together with the interested structural divisions of the Company, took measures to update the documents posted in the "Corporate Documents" section on the Company's Internet resource. In particular, the sections "Development Plan", "Constituent Documents", "Board of Directors", "Codes", "Policies and Rules", "Stakeholders" and "Registers of Affiliated Persons" have been updated.
8.	The PR Service, together with the interested structural divisions of the Company, should ensure the elimination of discrepancies or contradictions between the norms of the Regulations on the Procedure for Managing Reputational Risk and dissemination of information of KazakhExport Export Insurance Company Joint Stock Company and certain internal regulatory documents of the Company, taking into account the Company's withdrawal from the regulation of the Law of the Republic of Kazakhstan "On Insurance Activities";	Amendments/additions to the Regulations on the Procedure for Managing Reputational Risk and Dissemination of Information of KazakhExport Export Insurance Company Joint Stock Company	PR service memo dated 30.01.2025 No. 645-BH reports that the PR service, together with the interested structural divisions of the Company, updated the list of internal regulatory documents and other information that must be posted on the Internet resource specified in Appendix 4 of the Regulations in order to eliminate discrepancies or contradictions between the provisions of the Regulations on the procedure for managing reputational risk and disseminating information of the Company and individual internal regulatory documents, taking into account the Company's exit from the regulation of the Law of the Republic of Kazakhstan "On Insurance Activities" and the Resolution of the Management Board of the National Bank of the Republic of Kazakhstan dated October 29, 2018 No. 259. By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 13.01.2025 No. 4, amendments and additions No. 2 were made to the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated September 14, 2022 (minutes No. 58).

<p>9.</p>	<p>Taking into account the updating of Appendix 2 of the Regulations on the Procedure for Managing Reputational Risk and Dissemination of information of the KazakhExport Export Insurance Company Joint Stock Company, the PR service, together with interested structural divisions of the Company, should update the contents of the Company's Internet resource.</p>	<p>1) Amendments/additions to the Regulations on the Procedure for Managing Reputational Risk and Dissemination of Information of KazakhExport Export Insurance Company Joint Stock Company;</p> <p>2) Information from the PR Service to the Compliance Service about the results of updating the content of the Company's Internet resource</p>	<p>PR service memo dated 30.01.2025 No. 645-BH reports that the PR service, together with the interested structural divisions of the Company, updated the content of the Company's Internet resource taking into account the update of Appendix 2 of the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company.</p> <p>By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 13.01.2025 No. 4, amendments and additions No. 2 were made to the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated September 14, 2022 (minutes No. 58).</p>
<p>10.</p>	<p>The PR Service, jointly with the Legal Support Department of the Company, should update Annex 2 of the Regulations on the Procedure for Managing Reputational Risk and Disseminating Information of the KazakhExport Export Insurance Company Joint Stock Company, taking into account the above requirements of the Law "On Public Councils";</p>	<p>Amendments/additions to the Regulations on the Procedure for Managing Reputational Risk and Dissemination of Information of KazakhExport Export Insurance Company Joint Stock Company</p>	<p>PR service memo dated 30.01.2025 No. 645-BH reports that Appendix 2 of the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company JSC was updated taking into account the requirements of the Law On Public Councils.</p> <p>By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated 13.01.2025 No. 4, amendments and additions No. 2 were made to the Regulations on the procedure for managing reputational risk and disseminating information of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated September 14, 2022 (minutes No. 58).</p>

11.	The PR Service, together with the Legal Support Department of the Company, take measures to publish information and documents in the section "Public Council" in accordance with the requirements of the Law "On Public Councils" for 2023 and the 1st (first) half of 2024.	A memo from the PR Service to the Department of Legal Support on the need to provide and publish information and documents in the section "Public Council" in accordance with the requirements of the Law "On Public Councils"	PR Service memo dated 30.01.2025 No. 645-BH reports that the PR Service, together with the Department of Legal Support (DLS memo dated 06.12.2024 No. 7703-BH), updated the "Public Council" section of the Company in accordance with the requirements of the Law On Public Councils.
Item No.	Recommendation based on the results of corruption risks internal analysis	Completion format according to the action plan	Information on the implementation of the recommendation
1.	The Department of Human Resources Management and Operations should update the Rules for Providing Social support to Employees of the KazakhExport Export Insurance Company Joint Stock Company in terms of bringing paragraph 25 of the Rules into line with the current regulatory legal act, as well as in accordance with the changed name of the Company and the current organizational structure of the Company.	Amendments/additions approved by the authorized body of the Company to the Rules for Providing Social Support to Employees of the KazakhExport Export Insurance Company Joint Stock Company	By the decision of the Management Board of the Company dated 28.06.2024 (minutes No. 59), amendments No. 6 were introduced to the Rules for the provision of social support to employees of the KazakhExport Export Insurance Company Joint-Stock Company, approved by the decision of the Management Board of the KazakhExport EIC JSC dated June 5, 2019 (minutes No. 18)
2.	The Department of Human Resources Management and Operations should update the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company in accordance with paragraph 1 of Article 32 of the Labor Code of the Republic of Kazakhstan.	Amendments/additions approved by the authorized body of the Company to the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company	By the decision of the Management Board of the Company dated 31.01.2025 (minutes No. 10), amendments No. 7 were made to the Internal Labor Regulations of the Joint-Stock Company Export Credit Agency of Kazakhstan, approved by the decision of the Management Board of KazakhExport EIC JSC, minutes dated 28.06.2019 No. 23
3.	The Department of Human Resources Management and Operations should send a request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere, regarding an explanation of the need to request a copy of an identity card from an employee, as well as storage in a personal file, taking into account paragraph 1 of Article 32 and subparagraph 14 of paragraph 1 of Article 23 of the Labor Code.	An officially sent request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere	A letter, outgoing No. 22-11/2692, dated November 25, 2024, was sent to the Ministry of Labor and Social Employment of the Republic of Kazakhstan.
4.	The Department of Human Resources Management and Operations should update the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company, taking into account	Amendments/additions approved by the authorized body of the Company to the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company or an explanation from the	By the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated February 28, 2025 (minutes No. 17), amendments No. 8 were introduced to the Internal Labor Regulations

	the response of the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere.	authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere, on the need to request a copy of an identity card from an employee when concluding an employment contract	of the Export Credit Agency of Kazakhstan JSC, approved by the decision of the Management Board of the KazakhExport EIC JSC dated June 28 2019 (protocol no. 23)
5.	The Department of Human Resources Management and Operations should update the Rules for adaptation and training of employees of KazakhExport EIC JSC in terms of compliance with the form "LIST OF FAMILIARIZATION WITH INTERNAL REGULATORY DOCUMENTS WHEN APPLYING FOR a JOB", given in Appendix 1 of the Rules, to documents used in the current recruitment process in the Company, as well as updating the list of internal regulatory documents specified in Annex 1 of the Rules.	Amendments/additions approved by the authorized body of the Company to the Rules of adaptation and training of employees of KazakhExport EIC JSC	By the decision of the Management Board of the Company dated 31.01.2025 (minutes No. 10), the Rules for the adaptation and training of employees of the Export Credit Agency of Kazakhstan JSC were approved in a new edition, approved by the decision of the Management Board of the Export Credit Agency of Kazakhstan JSC dated January 31, 2025 No. 10
6.	The Department of Human Resources Management and Operations should update the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC in accordance with the findings specified in paragraphs 2.4.1.-2.4.3. Analytical information	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	By the decision of the Management Board of the Company dated 28.02.2025 (minutes No. 17), the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC were approved in a new edition.
7.	The Department of Human Resources Management and Operations, together with the Department of Project Management and Information Technology, should consider the possibility of automating the process of searching and selecting candidates, including candidates passing professional knowledge testing using automated information systems of the Company with the possibility of implementing measures to record/videotape the testing procedure	Application to the Department of Project Management and Information Technology for automation of the process of searching and selecting candidates, including candidates passing professional knowledge testing using automated information systems of the Company with the possibility of implementing measures for recording/video recording of the testing procedure	On December 31, 2024, the Department of Human Resources Management and Operational Activities submitted an application to the Department of Project Management and Information Technology to automate the process of searching for and selecting candidates.
		Certificate of commissioning	The Information System 'SimBASE' of JSC 'Export Credit Agency of Kazakhstan' has been integrated with the Unified Career Portal of JSC 'National Managing Holding 'Baiterek'' (Commissioning Certificate dated 19.09.2025).
8.	The Department of Human Resources Management and Operations shall regulate in the Rules for the Selection of candidates for vacant positions in the Company the procedure for the formation, storage and confidentiality of questions for testing in order to prevent their unauthorized dissemination and measures to protect them, as well as the format of testing in order to eliminate corruption risks.	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	By the decision of the Management Board of the Company dated 28.02.2025 (minutes No. 17), the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC were approved in a new edition.

9.	The Department of Human Resources Management and Operations should update the Rules for the selection of Candidates for Vacant Positions in the Export Credit Agency of Kazakhstan JSC in terms of bringing into line with paragraphs 15 and 20 of the Rules for the Selection of Candidates for Vacant positions of the Internal Audit Service, Compliance Service, Corporate Secretary, Actuaries accountable to the Board of Directors of the Export Credit Agency of Kazakhstan Joint-Stock Company.	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	By the decision of the Management Board of the Company dated 28.02.2025 (minutes No. 17), the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC were approved in a new edition.
10.	The Department of Human Resources Management and Operations shall regulate in the Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC the procedure and timing of posting information about open vacancies of the Company on the portal of the Electronic Labor Exchange in accordance with the requirements of the Social Code of the Republic of Kazakhstan.	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	By the decision of the Management Board of the Company dated 28.02.2025 (minutes No. 17), the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC were approved in a new edition.
11.	The Department of Human Resources Management and Operations, together with the PR Service of the Company, to consider the possibility of creating an "Archive of vacancies" on the Company's Internet resource.	<p data-bbox="825 824 1381 930">A memo to the PR service regarding the possibility of creating an "Archive of vacancies" on the Company's Internet resource.</p> <p data-bbox="825 938 1381 1076">The supplier's report on the services actually rendered during the reporting period as part of the site's technical support services</p>	<p data-bbox="1413 824 1929 930">An Office memo from the Department of Human Resources Management and Operational Activities dated 11/29/2024 No. 7474-BH was sent to the PR service</p> <p data-bbox="1413 938 1929 1076">According to the report of the supplier Smart Solutions IE (outgoing No. 42 dated 11/30/2024), a subsection «Vacancy Archive» was created on the Company's Internet resource.</p>
12.	The Department of Human Resources Management and Operations, together with the interested structural units, to update the test questions taking into account the identified detections.	Memos from interested structural units with updated test questions.	According to the Office memo of the Department of Human Resources Management and Operational Activities dated October 30, 2024 No. 6449-BH, the structural divisions of the Company are informed of the need to update professional tests. Based on the responses received from the interested structural divisions, the questions of professional tests have been updated.