

Analytical report on the results of an internal analysis of corruption risks in the activities of the NAO "International Center for Green Technologies and Investment Projects"

Astana, June 2026

In accordance with paragraph 5 of Article 8 of the Law of the Republic of Kazakhstan "On Combating Corruption", Standard Rules for conducting Internal Analysis of Corruption Risks, approved by Order No. 12 of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016, and based on the order of the Chairman of the Board of the NAO "International Center for Green Technologies and Investment Projects" (hereinafter - the Company) No.06-01-03/37 On April 09, 2026, an internal analysis of corruption risks in the Company's activities was conducted.

The deadline for conducting an internal analysis of corruption risks:
from April 27 to May 29, 2026.

The period covered by the internal corruption risk analysis is from
February 1, 2025 to February 1, 2026.

The internal analysis of corruption risks was carried out in the following areas:

- 1) identification of corruption risks in regulatory legal acts affecting the activities of the Company's structural divisions;
- 2) identification of corruption risks in the organizational and managerial activities of the Company's structural divisions.

The sources used for the analysis are regulatory legal acts of the Republic of Kazakhstan, internal acts of the Company affecting the Company's activities, audit materials of the Company's Internal Audit Service, publications in the media, appeals from individuals and legal entities, and other information not prohibited by the legislation of the Republic of Kazakhstan.

An internal analysis of corruption risks was conducted by a working group consisting of responsible employees of the Company's structural divisions. (Attached)

The Head of the Compliance Service is responsible for coordinating the work of the working group and conducting an internal analysis of corruption risks.

The internal analysis of corruption risks was carried out in the following structural divisions of the Company:

1. Department of Strategy and Analytics (hereinafter referred to as DSA)

DSA carries out its activities in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code, these Regulations, other internal regulatory documents, as well as orders of the Chairman of the Management Board of the Company.

The main objectives of the DSA are;

- 1) assistance in achieving the Company's strategic goals defined by the Company's mission;
- 2) informing the authorized bodies of the Company about the strategic and operational sustainability of the Company by analyzing and monitoring the level of risks within the established boundaries;
- 3) information and analytical support for the Company's activities and building a vision for the strategic development of digitalization of climate measures and green policy.

The following GNI are analyzed:

- 1) Risk Management and Internal Control Policy of the NAO "International Center for Green Technologies and Investment Projects";
- 2) Rules for the development, coordination, approval and monitoring of the implementation of the Development Strategy of the NAO "International Center for Green Technologies and Investment Projects".
- 3) Rules on risk management of the NAO "International Center for Green Technologies and Investment Projects".
- 4) Map of key performance indicators of the NAO "International Center for Green Technologies and Investment Projects".

According to the results of the analysis of corruption risks in the above-mentioned GNI and in the organizational and managerial activities of the department, the causes and conditions conducive to the commission of corruption offenses have not been identified.

2. The Department of Green Technologies and Investment Projects (hereinafter -ZTIP)

of ZTIP carries out its activities in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code, the Regulations on ZTIP, other internal regulatory documents, as well as orders of the Chairman of the Management Board of the Company.

The main goals and objectives of the TTIP are:

- 1) Grant project management;
- 2) search for and attract partners for the implementation of projects;
- 3) provision of consulting services;
- 4) adaptation of international practices for the implementation of an environmental knowledge assessment system;
- 5) formation and maintenance of the Register of "green" technologies as a tool of state support and attraction of investments.

The following GNI regulating the activities of the TTIP are analyzed:

- 1) The Charter of the NGO "International Center for Green Technologies and Investment Projects".
- 2) Regulations on the Department of Green Technologies and Investment Projects;
- 3) Rules for the selection, preparation, conclusion and execution of contracts for the provision of paid services by individuals who are not business entities of the NAO "International Center for Green Technologies and Investment Projects".
- 4) Regulations on the Project Committee of the NAO "International Center for Green Technologies and Investment Projects".
- 5) The procedure for calculating the cost of services to support the accreditation process in the Green Climate Fund.
- 6) Regulations on the formation and maintenance of the register of "green" technologies and projects of domestic manufacturers and suppliers of "green" technologies, projects and equipment.
- 7) Guidelines for investment activities of the International Center for Green Technologies and Green Projects Non-profit Joint Stock Company.

An analysis of corruption risks in the GNI regulating the activities of the TTIP has shown that when forming and maintaining the Register, there may be a risk of unjustified inclusion of projects in the Register of "green" Technologies.

Thus, in accordance with the Regulation on the Formation and Maintenance of the Register of "green" technologies and projects of domestic manufacturers and Suppliers of "green" technologies, Projects and Equipment (approved by the decision of the Board of the NAO "International Center for Green Technologies and Investment Projects" dated November 27, 2023, hereinafter referred to as the Regulation), the risk arises at the following stages, provided for by the Regulation:

- submission and consideration of applications;
- assessment of compliance with the criteria of "green" technologies;
- adoption by the authorized commission of a decision on the inclusion of the project in the Register.

At the same time, in the process of reviewing applications and making decisions on the inclusion of projects in the Register, there is a possibility of making subjective or unreasonable decisions, including due to insufficient transparency of procedures and the lack of clearly measurable evaluation criteria.

In addition, the analysis showed that the factors contributing to the risk are:

- the presence of evaluation criteria that allow for different interpretations;
- limited transparency of the commission's activities (lack of full publicity of decisions and their justifications);
- insufficient verification of the information provided by the applicants;
- lack of digitalization and automation of selection processes.

As a result, the members of the Commission have the opportunity to create conditions for lobbying the interests of individual applicants and inclusion in the Register of projects that do not meet the criteria of "green" technologies.

In accordance with the Regulations, the actions of the Commission members in the formation and maintenance of the Register of "Green" Technologies and Projects of domestic manufacturers and suppliers of "green" technologies indicate the existence of broad discretionary powers when considering applications and selecting projects for inclusion in the Register.

Thus, these circumstances create prerequisites for the emergence of causes and conditions conducive to the commission of corruption offenses.

Recommendations for minimizing risk:

1) the comprehensive implementation of measures aimed at regulating procedures, increasing transparency, digitalizing processes, strengthening the evidence base and developing independent expertise mechanisms will minimize subjectivity when making decisions on the inclusion of projects in the Register.

2) fix in detail in the Regulation a step-by-step algorithm for reviewing applications (deadlines, stages, responsible persons);

3) establish an exhaustive list of grounds for inclusion in the Register or refusal of inclusion with clear wording;

4) provide mandatory written justification for each decision of the Commission.

5) minimize the use of language that allows for an expansive interpretation (for example, "at discretion");

6) establish clear conditions under which the application:

- accepted for consideration;

- rejected;

- it is being sent for revision;

7) establish the obligation to send requests for revision if the submitted data is insufficient, rather than rejecting them without explanation.

3. Bureau of the Best Available Techniques (hereinafter - BNDT)

BNDT carries out its activities in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code, these Regulations, other internal regulatory documents defining the procedure for the Company's activities, as well as orders of the Chairman of the Management Board of the Company.

The main objectives of the BNDT are:

1) organization of the processes of developing reference books on BAT.

2) organizing and conducting consulting work on obtaining CER by industrial enterprises.

3) organization of the activities of Technical Working Groups (TRGS) according to the industry profile.

4) creation of a regulatory framework for achieving strategic targets.

5) identification of potential in industrial enterprises for the possible introduction of BAT.

6) provision of consulting services and promotion of BAT policy in the Republic of Kazakhstan;

7) the introduction of the best available techniques and the introduction of digital mechanisms to implement the plan for the general availability of information on BAT.

In its activities, the BNDT is guided by the following internal regulatory documents:

1) Rules for the provision of consulting services for the provision of expert opinion on the compliance of existing /planned technical solutions with the principles of transition to the best available techniques.

2) Rules for conducting business games and webinars in the field of environmental protection.

3) Rules for the provision of consulting services for obtaining a comprehensive environmental permit.

4) The rules for conducting a comprehensive technological audit (expert assessment) and the procedure for calculating the cost of a comprehensive technological audit (expert assessment).

5) Instructions for monitoring and reviewing reference books on the best available techniques.

According to the results of the analysis of corruption risks in the above-mentioned GNI and the organizational and managerial activities of the BNDT, the causes and conditions conducive to the commission of corruption offenses have not been identified.

4. Department of Legal and Administrative Work

The Company's staff as of the analyzed period is 66 units, the actual number is 60 employees.

The facts of hiring persons who had previously committed corruption offenses have not been established.

No facts of joint work of close relatives, spouses and relatives who are directly subordinate to each other have been revealed.

During the analyzed period, there were no cases of employees being disciplined.

No internal investigations were conducted by the responsible HR officer during the analyzed period.

There are no facts of bringing employees of the Company to criminal responsibility for committing corruption crimes.

Based on the results of an internal analysis of corruption risks in the Department's activities, potential corruption risks have been identified.

4.1 Paragraph 162 of the Personnel Management Regulations, approved by the decision of the Board of the NAO "International Center for Green Technologies and Investment Projects" dated July 19, 2024 (Protocol No. 14) (hereinafter referred to as the Regulations), provides that an act of the employer may introduce a special form of labor process outside the employer's location using information and communication technologies. technology (remote work).

During the analyzed period, by orders of the Chairman of the Management Board, the Company's employees were transferred to remote work for the following reasons:

- when applying for a job within the time limits set by the employment contract;
- taking into account the value of the employee and the impossibility of continuing the employment relationship without establishing remote work within the time limits established by the employment contract.

This creates corruption risks associated with the possibility of a selective approach in providing remote work to individual employees, the lack of common grounds and criteria for decision-making, as well as the risk of privileged working conditions.

Recommendations:

- 1) establish an exhaustive list of grounds and a single approval procedure for transferring employees to remote work;
- 2) to ensure transparency and an equal approach when making decisions on the transfer of employees to remote work.

4.2 Paragraph 168 of the Regulations identifies the risks associated with the uncertainty of the timing of informing about the absence of an employee at the workplace.

It is stipulated that the RSP informs the responsible HR department about the absence of an employee without a valid reason "on the first day of the employee's absence." At the same time, this wording does not define a specific time interval for sending information (immediately, within an hour, before a certain time, etc.), which allows for an ambiguous interpretation of the norm.

However, in accordance with the labor legislation of the Republic of Kazakhstan, the absence of an employee from work for three or more consecutive hours in one working day (work shift) without a valid reason may be grounds for termination of an employment contract at the initiative of the employer.

Thus, the procedure established by the Regulations for notification "on the first day of absence" creates the risk of late detection of the employee's absence and failure to take timely response measures. In addition, the lack of a clearly defined notice period may contribute to:

- selective approach in fixing absenteeism;
- concealment of the facts of the absence of individual employees;
- creation of privileged conditions for individuals;
- abuse of official authority by direct supervisors.

In this case, there is also an indicator of the availability of broad discretionary powers for the head of the structural unit, the ability to make several types of decisions or refuse to make a decision.

Recommendations:

- 1) set a specific deadline for notifying the responsible HR department (for example, immediately or no later than three hours after the employee's absence from the workplace);
- 2) regulate the procedure for recording the absence of an employee (report, official memo, electronic recording, etc.).

4.3 Paragraphs 230 and 231 of the Regulations establish that the stipulated time limits for reviewing the materials of an official investigation may entail the risk of late application of disciplinary action.

Thus, the duration of an internal investigation is up to 15 working days, consideration of the conclusion by the Personnel Committee is 2 working days, and sending materials to the responsible HR department is up to 1 working day. Additionally, time is required to prepare and issue an order for disciplinary action and to familiarize the employee with it. Collectively, these procedures may exceed the time limits for the application of disciplinary penalties established by the labor legislation of the Republic of Kazakhstan.

The presence of several consecutive stages of approval and the lack of reserve time create conditions for artificially delaying the procedure for reviewing materials, which may lead to the non-application of disciplinary action on formal grounds, as well as promote a selective approach when considering similar cases.

In order to minimize risks, it is recommended to provide for shortened deadlines for reviewing the materials of the internal investigation to ensure compliance with the deadlines for the application of disciplinary penalties provided for by the labor legislation of the Republic of Kazakhstan.

4.4 Subparagraph 4) of paragraph 11 of the Regulations on the Personnel Committee provides for the authority of the Committee to develop recommendations on concluding a contract for the provision of paid services with individuals who are not business entities.

Thus, there are no criteria, grounds and procedures for considering candidates for individuals, and there are no defined cases in which it is allowed to conclude contracts for the provision of paid services with such persons. The requirements for confirmation of qualifications, experience, justification of the need to involve a specific person, as well as mechanisms for ensuring transparency and objectivity of decision-making are not regulated.

The lack of clear procedures and criteria creates conditions for a subjective approach when choosing individuals, providing unreasonable advantages to individuals, as well as conflicts of interest when making decisions by Committee members.

In order to minimize risks, it is recommended to specify the grounds and procedure for making recommendations on concluding contracts for the provision of paid services, determine the criteria for selecting individuals, a list of necessary supporting documents, and provide mechanisms to prevent conflicts of interest and ensure transparency of decisions.

4.5 Paragraph 241 of the Regulations establishes that the norm on the possibility of early removal of disciplinary punishment before the expiration of 6 months contains corruption risks associated with the uncertainty of decision-making criteria.

Thus, the wording "proved himself to be a conscientious employee" is evaluative and subjective, since the Regulations do not define specific indicators, criteria and procedures for evaluating employee integrity. The absence of clear grounds and procedures for making a decision on the early lifting of penalties provides officials with broad discretion.

In addition, the possibility of early removal of a disciplinary penalty without setting a minimum period of its validity may contribute to a conflict of interest, subjective decision-making, and offset the disciplinary and preventive nature of the penalty.

Recommendations:

1) establish a minimum period after which consideration of the issue of early removal of the penalty is allowed.;

2) provide mandatory documentary evidence of the grounds for lifting the penalty, specifying the criteria for assessing the employee's integrity.

4.6 During the analysis of Chapter 4 of the Regulations governing the procedure for the search, selection and selection of candidates for vacant positions of the Company, it was found that there are corruption risks associated with insufficient regulation of candidate verification procedures and ensuring transparency of competitive selection.

Thus, the Regulations do not provide for an audit by the compliance service in respect of candidates applying for key positions of the Company, including heads of structural divisions, employees of the financial unit and other positions related to making managerial, financial and organizational decisions.

The lack of compliance verification of candidates creates the risk of appointing persons with potential conflicts of interest, reputational risks, as well as other circumstances that may negatively affect the Company's activities.

In addition, the procedure for receiving and registering incoming applications from candidates is not sufficiently regulated. The Regulations do not provide mechanisms for monitoring the completeness of registration of incoming resumes and responses from candidates, as well as the obligation to use several communication channels (contact phones, e-mail addresses) for sending documents by candidates.

These circumstances may create conditions for:

- unjustified exclusion of individual candidates from the competitive selection;
- restrictions on candidates' access to participate in the competition;
- manipulation of the number and composition of candidates admitted for consideration.

There is also no requirement to keep a single record of incoming applications and record information about the date and time of receipt of candidates' documents, which reduces the transparency of competitive procedures and complicates subsequent control.

Recommendations:

1) provide for mandatory verification by the compliance service in relation to candidates applying for key positions;

2) establish a requirement to include several contact channels in the job advertisement, including additional email addresses;

3) provide a mechanism for recording and comparing the number of applications received, admitted and rejected candidates.

4.7 During the analysis, it was found that paragraph 24 of the Rules of Remuneration, Bonuses and Social Support for Employees of the NAO "International Center for Green Technologies and Investment Projects" dated November 4, 2021 (Protocol No. 42) (hereinafter referred to as the Rules of Remuneration) provides for the possibility of setting a minimum salary for up to 6 months when applying for a job. months. This provision contains corruption risks associated with the uncertainty of the grounds and procedure for making a decision.

So, the rules of remuneration are not defined:

- criteria and grounds for setting the minimum salary;
- the procedure for determining the amount of salary after 6 months.

In addition, the wording "may be established" provides broad discretion in determining the terms of remuneration of employees, which may contribute to a subjective approach, unequal pay conditions for employees in similar positions, as well as the provision of unreasonable advantages or restrictions to individuals.

The lack of a transparent mechanism for setting official salaries creates the risk of unjustified determination of wages and labor disputes.

Recommendations:

- 1) determine the grounds and criteria for setting the minimum salary;
- 2) regulate the procedure and deadlines for reviewing the official salary, providing for mandatory documentary substantiation of the decision.

4.8 Paragraph 26 of the Remuneration Rules establishes that the norm providing for the possibility of changing the official salary of an administrative/managerial employee on the recommendation of the Company's Personnel Committee contains corruption risks associated with the lack of clear grounds, criteria and decision-making procedures.

Thus, the Rules of remuneration do not define:

- the procedure for initiating the issue of changing the official salary;
- the need for a reasoned representation of the head of the structural unit.

The lack of a transparent and regulated mechanism for considering salary changes creates conditions for conflicts of interest and lack of transparency in personnel and financial decisions.

Recommendations:

- 1) provide for mandatory motivated representation of the head of the structural unit;
- 2) to establish specific indicators and criteria for salary changes;
- 3) regulate the procedure for reviewing and approving relevant decisions.

4.9 During the analysis of section 6 of the Remuneration Rules governing the procedure for awarding bonuses to administrative/managerial employees of the Company, it was established that bonuses are carried out within the approved salary fund and/or if there are savings on the salary fund, however, they do not define the mechanism for confirming the lack of financial opportunity to pay bonuses, as well as the procedure for documenting relevant decisions.

In addition, the provisions on the right of the Company's Management Board to apply a percentage reduction in bonuses or to make decisions on bonuses in the presence or absence of wage savings contain broad discretionary powers, since there are no:

- criteria for determining the financial capability of the Company with the attachment of supporting financial documents;
- the procedure for informing employees about the reasons for the reduction or non-payment of bonuses.

The absence of a mandatory financial justification may create conditions for a subjective approach when making decisions about bonuses, the selective application of incentive payments, as well as the provision of unreasonable advantages or restrictions to individual employees.

Recommendations:

- 1) provide for the mandatory availability of a reasoned conclusion (certificate) of the financial department on the availability or lack of financial capacity or insufficient funds for the payment of bonuses;
- 2) regulate the procedure for making decisions on the reduction or non-payment of premiums.

4.10 During the analysis, paragraph 5 of the Rules for Evaluating the Effectiveness of Employees of the Non-Profit Joint Stock Company International Center for Green Technologies and Investment Projects, approved by the decision of the Management Board dated July 19, 2024 (Protocol No. 14) (hereinafter referred to as the Evaluation Rules) established that the norm providing for the definition of the reporting

period (quarter or year) according to the decision The Chairman of the Management Board of the Company or a person authorized by him, contains corruption risks associated with the existence of broad discretionary powers. In this case, there is an indicator of the presence of broad discretionary powers of an official, the ability to make several types of decisions or refuse to make a decision.

Thus, the Rules do not define the criteria, grounds and cases in which the reporting period is set as a quarter or as a year. At the same time, the length of the reporting period directly affects the results of evaluating the effectiveness of employees, achieving KPIs, applying incentive measures, and making personnel decisions. The possibility of arbitrarily defining the reporting period may create unequal conditions for evaluating employees and contribute to providing unreasonable advantages to individuals.

Recommendations:

- 1) establish clear criteria and grounds for determining the reporting period;
- 2) provide for mandatory documentary substantiation of decisions on the establishment of the reporting period.

4.11 Paragraph 16 of the Evaluation Rules establishes that the norm providing for the duty of the head of a structural unit to "monitor the behavior of a subordinate employee" is not disclosed or specified by the Rules, there are no criteria, methods, limits and procedures for such monitoring. Also, objective indicators for evaluating employee behavior and the form of recording the results of observation have not been determined.

The use of vague and subjective formulations creates conditions for arbitrary interpretation of the norm, a subjective approach to evaluating employees, as well as the possibility of forming a biased attitude towards individual employees.

In addition, the results of such "surveillance" can have an impact on evaluating the effectiveness of an employee's activities, making personnel decisions, and applying incentive or disciplinary measures, which creates a risk of abuse of authority and granting unreasonable advantages or restrictions to individuals.

Recommendations:

- 1) eliminate evaluative and ambiguous formulations that allow for subjective interpretation and specify the content of the concept of "observing behavior";
- 2) to determine objective criteria for evaluating the employee's personal and business competencies.

4.12 As part of the ongoing analysis of corruption risks, taking into account the concentration of legal, personnel, procurement and administrative functions in one structural unit, it seems advisable to consider the possibility of further improving the internal control system and the distribution of powers.

The current organizational model may create separate compliance and operational risks associated with:

1. Lack of sufficient separation of execution and control functions.
2. Reducing the independence of legal and corporate expertise.
3. Concentration of critical processes and authorities.
4. Increased dependence on one employee (key person risk).

Recommendations:

In order to further improve the internal control system, increase the efficiency of the distribution of powers and minimize potential compliance and operational risks, we believe it is necessary to consider the possibility of redistributing individual functions between the Company's structural divisions, as well as making changes to the organizational structure by allocating independent functional areas for legal support, procurement, personnel management and administrative support.

The implementation of these measures will strengthen the principle of separation of functions, increase the independence of control procedures and ensure additional stability of the corporate governance system.

5. Finance Department

FD carries out its activities in accordance with the legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code, these Regulations, other internal regulatory documents, as well as orders of the Chairman of the Management Board of the Company.

The main objectives of the FD are:

- 1) achieving the Company's performance indicators in accordance with the Strategy;
- 2) financial and economic support of the Company's activities;
- 2) formation and provision of a complete and reliable KFO of the Company;

- 3) ensuring the vital activity of the Company, compliance with the procurement procedure in the Company;
- 4) maintaining accounting records;
- 5) ensuring the execution of contracts and agreements of the Company.

In its activities, the FD is guided by the following internal regulatory documents:

- 1) The tax accounting Policy was developed by the NAO "International Center for Green Technologies and Investment Projects".
- 2) Rules for the development, coordination, approval, monitoring, and adjustment of the Development Plan of the NAO "International Center for Green Technologies and Investment Projects."
- 3) Rules on the procedure for using the funds of the non-profit joint-stock company "International Center for Green Technologies and Investment Projects" provided for representative expenses.
- 4) Rules for the preparation of financial statements in accordance with international Financial Reporting Standards in the NAO "International Center for Green Technologies and Investment Projects".
- 5) The procedure for calculating the cost of consulting services for the provision of advisory services for the provision of expert opinions on the compliance of planned technical solutions with the principles of transition to the best available techniques.
- 6) The procedure for calculating the cost of consulting services for obtaining a comprehensive environmental permit.

According to the results of the analysis of corruption risks in the GNI regulating the activities of the FD, there are conditions for the commission of corruption offenses. They are indicated above in paragraph 4.9, regarding section 6 of the Rules of Remuneration, Bonuses and Social Support for Employees of the NAO "International Center for Green Technologies and Investment Projects" dated November 4, 2021 (Protocol No. 42).

In addition, in accordance with subparagraph 1) paragraph 23, subparagraph 1) Paragraph 28 of the Model Regulation on Anti-Corruption Compliance Services in quasi-Public Sector Entities (Approved by Order No. 112 of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan dated March 31, 2023). The anti-corruption compliance service, as part of its activities, requests and receives information and materials from the structural divisions of a quasi-public sector entity, including those constituting commercial and official secrets, and employees of the structural divisions of a quasi-public sector entity assist the anti-corruption compliance service by providing documents and information necessary to carry out the tasks and functions of the anti-corruption compliance service..

In addition, in accordance with sub-paragraphs 1) and 2) of paragraph 23 of the Regulations on the Compliance Service (Approved by the decision of the Board of Directors of NAO International Center for Green Technologies and Investment Projects dated March 12, 2021, Protocol No. 02/16), the Service has the right to implement its main tasks and perform its functions in accordance with the established procedure:

- to request and receive information and materials from other structural divisions of the Company, on an unlimited and unhindered basis;
- have access to all information, including insider and DSP information, as well as to the information and accounting systems of the Company.

At the same time, in accordance with paragraphs 44 and 45 of the Regulations on the Internal Audit Service (Approved by the decision of the Board of Directors of the NAO "International Center for Green Technologies and Investment Projects" dated December 20, 2024, Protocol No. 02/02-27), a list of persons and bodies to whom reports on the results of audit assignments are submitted is established. There is no provision for submitting audit reports to the Compliance Service.

In this case, there is a conflict between the Standard Provision on Anti-Corruption Compliance Services in quasi-Public Sector Entities and the above-mentioned internal regulatory documents of the Company, which complicate the enforcement process and allow the application of norms beneficial to one of the participants in the relationship, which significantly increases the likelihood of corruption offenses.

Recommendation:

We consider it necessary to bring paragraphs 44 and 45 of the Regulation on the Internal Audit Service in line with the Model Regulation on Anti-Corruption Compliance Services in Quasi-Public Sector Entities and with sub-paragraphs 1) and 2) of paragraph 23 of the Regulation on the Compliance Service, thereby eliminating this conflict in regulatory documents.

According to subparagraph 3) of paragraph 17 of the Model Rules for Conducting an Internal Analysis of Corruption Risks, paragraph 32 of the Methodological Recommendations for Conducting an internal Analysis of Corruption Risks, approved by Order No. 488 of the Chairman of the Anti-Corruption

Agency of the Republic of Kazakhstan dated December 30, 2022, when conducting an internal analysis of corruption risks, an analytical report is compiled containing a list of positions, exposed to corruption risks.

Taking into account the right to make decisions and perform organizational and economic functions, the entire category of managers falls under inclusion in the list of positions subject to corruption risks.

The list of positions subject to corruption risks is used by the Company's Compliance Service when organizing systematic preventive work with persons holding positions subject to corruption risks.

Conclusion. An internal analysis of corruption risks in the Company's activities has shown that corruption risks exist in internal acts related to the Company's activities and in organizational and managerial activities, which must be eliminated or minimized in order to achieve more positive results of preventive measures to combat corruption.

Based on the results of an internal analysis of corruption risks, an action plan has been developed to eliminate the causes and conditions conducive to the commission of corruption offenses, indicating the timing of the implementation of recommendations to eliminate identified corruption risks.

Chairman of the Management Board

Head of Compliance Service