

**Action plan to eliminate the causes and conditions
conducive to the commission of corruption offenses identified by the results
of an internal analysis of corruption risks at the NAO "International Center for Green Technologies and Investment Projects"**

№	Recommendations based on the results of the internal analysis of corruption risks	Events	Completion Form	Responsible performers	Due date
1	<p>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.</p> <p>2. Fix in detail in the Regulation a step-by-step algorithm for reviewing applications (deadlines, stages, responsible persons).</p> <p>3. Establish an exhaustive list of grounds for inclusion in the Register or refusal to include it with clear wording.</p> <p>4. Provide mandatory written justification for each decision of the Commission.</p> <p>5. Minimize the use of broad-based language (for example, "at discretion").</p> <p>6. Establish clear conditions under which the application:</p> <ul style="list-style-type: none"> - accepted for consideration; - rejected; - it's being sent for revision. <p>7. Establish the obligation to send requests for revision if the submitted data is insufficient, rather than rejecting them without explanation.</p>	<p>Development and approval by the decision of the Board of the NAO "International Center for Green Technologies and Investment Projects" of 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</p>	<p>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</p>	<p>Department of Green Technologies and Investment Projects</p>	<p>July 31, 2026</p>

2	<p>1. Establish an exhaustive list of grounds and a single approval procedure for transferring employees to remote work.</p> <p>2. To ensure transparency and an equal approach when making decisions on the transfer of employees to remote work.</p>	Development and amendment of paragraph 162 of the Personnel Management Regulations.	Approved Staff Management Regulations.	Department of Legal and Administrative Work.	Until August 31 In 2026.
3	<p>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).</p> <p>2. Regulate the procedure for recording the absence of an employee (act, memo, electronic recording, etc.).</p>	Development and amendment of paragraph 168 of the Personnel Management Regulations.	Approved Staff Management Regulations.	Department of Legal and Administrative Work.	Until August 31 In 2026.
4	To provide for shortened terms of consideration of 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.	Development and amendment of paragraphs 230 and 231 of the Personnel Management Regulations.	Approved Staff Management Regulations.	Department of Legal and Administrative Work.	Until August 31 In 2026.
5	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.	Development and amendment of subparagraph 4) of paragraph 11 of the Regulations on the Personnel Committee	Approved Regulations on the Personnel Committee	Department of Legal and Administrative Work.	Until August 31 In 2026.
6	<p>1. Establish a minimum period after which consideration of the issue of early removal of the penalty is allowed.,</p> <p>2. Provide for mandatory documentary evidence of the grounds for lifting the penalty, specifying the criteria for assessing the employee's integrity.</p>	Development and amendment of clause 241 of the Personnel Management Regulations.	Approved Staff Management Regulations.	Department of Legal and Administrative Work.	Until August 31 In 2026.
7	<p>1. Provide for mandatory verification by the compliance service in relation to candidates applying for key positions.</p> <p>2. Establish a requirement to include several contact channels in the job advertisement, including additional email addresses.</p>	Development and amendment of chapter 4 of the Personnel Management Regulations.	Approved Staff Management Regulations.	Department of Legal and Administrative Work.	Until August 31 In 2026.

	3. Provide a mechanism for recording and comparing the number of applications received, accepted and rejected candidates.				
8	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.	Development and amendment of clause 24 of the Rules of Remuneration, Bonuses and Social support for Employees.	Approved Rules for remuneration, bonuses, and social support for employees.	Department of Legal and Administrative Work.	Until August 31 In 2026.
9	1. Provide for mandatory motivated representation of the head of the structural unit. 2. Set specific indicators and criteria for salary changes. 3. Regulate the procedure for reviewing and approving relevant decisions.	Development and amendment of clause 26 of the Rules of Remuneration, bonuses and social support for Employees.	Approved Rules for remuneration, bonuses, and social support for employees.	Department of Legal and Administrative Work.	Until August 31 In 2026.
10	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.	Development and amendment of section 6 of the Rules of Remuneration, Bonuses and Social support for Employees.	Approved Rules for remuneration, bonuses, and social support for employees.	Finance Department Department of Legal and Administrative Work.	Until August 31 In 2026.
11	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.	Development and amendment of paragraph 5 of the Rules for evaluating the effectiveness of employees.	Approved Rules for evaluating the effectiveness of employees.	Department of Legal and Administrative Work.	Until August 31 In 2026.
12	1. Eliminate evaluative and ambiguous formulations that allow for subjective interpretation and specify the content of the concept of "observing behavior." 2. To define objective criteria for evaluating the employee's personal and business competencies.	Development and amendment of paragraph 16 of the Rules for evaluating the effectiveness of Employees.	Approved Rules for evaluating the effectiveness of employees.	Department of Legal and Administrative Work.	Until August 31 In 2026.

13	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.	To consider the possibility of allocating authority and minimizing potential compliance and operational risks by changing the organizational structure of the Company.	The approved organizational structure of the Company.	Department of Legal and Administrative Work.	Until October 31 In 2026.
14	It is 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.	To coordinate with the Board of Directors of the Company and amend paragraphs 44 and 45 of the Regulations on the Internal Audit Service.	Approved Regulations on the Internal Audit Service.	Internal Audit Service (in agreement with the Board of Directors)	Until October 31 In 2026.

Head of Compliance Service

E. Khairullin