Annex 6
to the minutes of the Board of Directors
of KazakhExport EIC JSC
dated May 03, 2024, No. 7

"Approved by"
the resolution of the Board of Directors
of KazakhExport EIC JSC
dated May 03, 2024 (Minutes No. 7)

Risk Management Policy of the Export Credit Agency of Kazakhstan Joint Stock Company

Astana, 2024

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SUMMARY OF IRDs

Name of the IRD	Risk Management Policy
The owner of the IRD	Risk Management Department
Access level	Publicly available
Measures to familiarize all employees of the Company with the IRD	E-mail distribution within 1 (one) business day from the date of posting the IRD on the network disk "Internal Portal"

Chapter 1. General provisions

1. This Risk Management Policy of Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Policy, Company, ECA) has been developed in accordance with the provisions of the current legislation of the Republic of Kazakhstan, including the Rules for the Formation of a risk management and Internal Control system, as well as the formation of reserves and actuarial calculations for the Export Credit Agency of Kazakhstan, approved by the Order of the Ministry of Trade and Integration of the Republic of Kazakhstan dated March 29, 2024 No.160-НҚ (hereinafter referred to as the LSI for RMS), the Risk Management Policy of Baiterek National Managing Holding JSC (hereinafter referred to as the Holding), internal documents regulating the Company's activities, as well as taking into account international standards in the field of risk management (COSO ERM:2017, ISO 31000:2018) and recommendations of the Basel Committee on Banking Supervision.

2. This Policy reflects the vision, goals and objectives of the risk management system in the Company (hereinafter referred to as the RMS), defines the basic principles of building the RMS and the risk management structure, the main components and elements of the RMS, provides a systematic and consistent approach to the implementation of the risk management process and the exchange of information about risks between the Holding and the Company, as well as defines common approaches to classify the risks of the Company, the mechanisms for monitoring the Company's RMS and evaluating the effectiveness of the Company's RMS.

3. The description of the methods and procedures of the risk management process, including the procedure for providing and reporting on risk management, tasks, functions, responsibilities of participants in the process of managing the main types of risks, risk management measures and other components of the risk management process are presented in the internal documents of the Company approved by the Board of Directors or the Management Board of the Company in accordance with their competence. The methods and procedures of the risk management process specific to the Company are determined by the management bodies and executive bodies of the Company. The methods and procedures for assessing and managing the main types of risks that are common to the Holding and its subsidiaries are determined by the Holding.

4. The Policy is a top-level document in the RMS and applies to all types of activities of the Company. The Policy is mandatory for review and application by all structural divisions and all employees of the Company. In the performance of functional duties and the implementation of assigned tasks, each employee of the Company is guided by this Policy.

5. Risk management is understood as a set of culture, capabilities, practices and coordinated actions aimed at defining and achieving the strategic goals of an organization, taking into account risk.

6. The purpose of the risk management process is to achieve a balance between maximizing the use of opportunities in order to obtain benefits and prevent losses. This process is an important component of the management process and an integral part of a well-developed corporate governance system.

7. Risk management is not a separate function or a function of a separate structural unit of the Company, but is an integral part of each business process of the Company and the functional responsibilities of each employee of the Company.

8. The introduction of RMS in the Company implies the establishment and development of the necessary infrastructure and culture, and also covers the application of logical and systematic methods of identification, analysis and evaluation, monitoring, control and risk management inherent in all areas of activity, functions or processes of the Company in order to prevent losses and maximize benefits.

9. The main element of the Company's risk management process is its integration with the specifics of the organization, the basic principles of activity, business processes, and the

involvement of each employee in the risk management process.

10. When carrying out its activities within the framework of the Policy, the Company takes into account the interests and consequences of the implementation of risks for the Sole Shareholder and other interested parties.

11. The risk management process includes the following steps:

1) identification of risks:

assessment of corporate risks and risk-forming factors in the Company's business processes (systematic and constant monitoring, analysis of all possible causes of damage, qualitative assessment of their probability and size);

2) classification of risks of the Company (study of the specifics of risks and the factors that lead to their occurrence, influence their development, expert assessments of historical data, risk map);

3) evaluation of the effectiveness of the Company's RMS, the frequency of which is established according to the Rules of the organization of Internal audit in the Company;

2) implementation of regular stress testing of risks;

3) choosing and applying a risk management method;

4) adjusting the risk management system.

Chapter 2. General definitions

12. The following basic concepts are used in this document:

1) **risk owners are** structural divisions or employees of the Company who, by virtue of their functional tasks, are or may be a potential source of material and (or) intangible losses in the course of their activities, as well as have the capabilities to identify, analyze, evaluate and control exposure to events that are sources of exposure to various types of risk, as well as responsible for the management and supervision of specific risks of the Company;

2) **a subsidiary (SUB)** is a legal entity, fifty or more percent of the voting shares (participation interests) of which are directly **owned** by Baiterek National Managing Holding JSC on the right of ownership or trust management;

3) **The sole shareholder is** Baiterek National Managing Holding JSC;

4) **risk appetite is** the possibility of changes in results, both on a short-term and long–term basis, which the Company and its leaders are ready to accept as part of their business development strategy;

5) **risk** – exposure to uncertainty related to events or actions that may affect the achievement of set goals and objectives;

6) **risk culture is** the recognition by all structural divisions and employees at all levels of the Company of the need to manage and control exposure to risks and build their work with this aspect in mind;

7) **SD** – structural subdivision/employees who are not members of the SD of the Company;

8) the authorized body in the field of regulation of trade activities (hereinafter referred to as the authorized body) is the central executive body that forms trade policy and carries out management, as well as intersectoral coordination in the field of trade activities;

13. All other terms are used in this Policy in the meanings defined by the internal documents of the Company and the legislation of the Republic of Kazakhstan. The Policy is subject to review, if necessary, and approval by the Company's Board of Directors.

14. The Policy is publicly disclosed on the Company's website and the main parameters in the Company's annual report. Amendments to the **RMS** are communicated to all employees and officials of the **Company** by e-mail.

Chapter 3. Basic principles of the risk management system

15. The main objectives of the Policy are:

1) building an effective integrated system and creating an integrated risk management process as an element of the Company's management, as well as continuous improvement of activities based on a standardized approach to risk management methods and procedures;

2) ensuring that the Company accepts acceptable risks adequate to the scale of its activities;

3) ensuring the sustainable development of the Company within the framework of the implementation of the Company's Development Plan;

4) formation and development of the RMS that provides the Company with the necessary, reliable and timely information for making management decisions in order to effectively achieve the objectives set by the Company.

16. The policy is aimed at the implementation of the following tasks:

1) ensuring a common understanding of the risks of the Company by all participants of the RMS;

2) creating a full-fledged base for the decision-making and planning process;

3) ensuring a continuous coordinated risk management process based on timely identification, assessment, analysis, monitoring, and control to ensure the achievement of set goals;

4) implementation and improvement of a management system to prevent and minimize potentially negative events;

5) improving the efficiency of resource use and allocation;

6) prevention of losses and losses by increasing the efficiency of the Company's activities, ensuring the protection of assets and equity;

7) ensuring the efficiency of business processes, reliability of internal and external reporting and promoting compliance with legal requirements;

17. The Company uses a three-line model, the main purpose of which is the effective functioning of the RMS due to a clear separation of roles and functions. The responsibilities of each of the lines are as follows: operational risk management is carried out on the first line; monitoring of aggregated risk and control of the first line for risk management is carried out on the second line and providing independent and objective guarantees and recommendations regarding the adequacy and effectiveness of the RMS behind the third line. If each line of defense effectively fulfills its role, the likelihood increases that the Company will successfully achieve its strategic goals.

18. The risk management process in the Company is a constant, dynamic and continuous process and consists of the following components: internal risk management environment, definition of goals, identification of risk, risk measurement (assessment), risk response (management), control and monitoring, risk appetite and tolerance to significant risks.

Chapter 4. Internal environment

19. The internal environment determines the nature of the Company and how its employees view and respond to risks. The internal environment is the basis for all other components of the RMS, includes the philosophy of risk management, risk appetite, control by management bodies, ethical values, competence and responsibility of employees, the structure of Company, its capabilities determined by human, financial and procedural resources.

20. The relationship of Company with the external environment (business structures, social and regulatory, and other political and financial bodies) is reflected in the internal environment and affects its formation. The external environment of the Company is complex in its structure and includes various industries that are interconnected with each other, and creates conditions for the emergence of systemic risks.

21. The Company's activities are aimed at creating an internal environment that increases employees' understanding of risks and increases their responsibility for risk management. In particular, the internal environment should support the following principles of

the Company as a whole:

1) identification and consideration of all forms of risks in decision-making and support of a comprehensive risk vision by the Company's management;

2) creation and assessment at the Company level of such a risk profile that best meets the goals of the Company as a whole;

3) support for a sense of ownership and responsibility for risks, risk management at the appropriate levels of the management hierarchy (SD, etc.). At the same time, risk management does not mean transferring responsibility to others;

4) monitoring compliance with the Company's internal policies and procedures, and the state of the corporate governance system;

5) timely information about significant (critical) risks and disadvantages of RMS;

6) understanding that risk management policies and procedures are mandatory;

7) rational decision-making and action in the public interest based on a comprehensive assessment of the information provided in good faith, with duty of care. The obligation to exercise prudence and care does not apply to errors in the business decision-making process, unless employees and officials of the Company have shown gross negligence in doing so;

8) making decisions by employees and officials of the Company and acting in good faith in the interests of the Company, without taking into account personal benefits, the interests of persons connected with the Company by special relations and, to the detriment of the interests of the Company (duty of loyalty).

22. The main principles of the Company's risk management process are:

1) integrity – consideration of the elements of the total risk of the Company in the context of corporate RMS;

2) openness is a ban on considering the RMS as autonomous or separate;

3) structurality – a comprehensive risk management system has a clear structure;

4) awareness – risk management is accompanied by the availability of objective, reliable and relevant information;

5) continuity and continuous improvement - risk management is a constantly improving process that requires regular review of accepted methods, limits, financial indicators, measures and risk management tools based on our own experience, the emergence of new technical tools and methods, taking into account accumulated domestic and foreign experience to ensure a real quantitative and qualitative assessment of internal and external risks;

6) cyclicity – the risk management process is a constantly recurring structured cycle of its main components;

7) economic feasibility - the identification of priority risk control measures should be implemented cost-effectively when assessing the ratio of the cost of implementing control procedures to the amount of possible losses.

23. The structure of the risk management system in the Company is represented by risk management at several levels involving the following bodies and divisions of the Company: The Sole Shareholder, the Board of Directors, the Management Board, collegial bodies, the SD responsible for the coordination of RMS, the Internal Audit Service, other SDs and employees of the Company.

24. The Board of Directors and the Management Board of the Company are involved in the process of risk management and creation of a control environment. Risk management is not only a function of the SD responsible for the coordination of RMS, it is also integrated into all processes of the Company. An official is responsible for the implementation of a specific risk event/A SD is a risk owner who initiates and implements certain processes in the Company's activities.

25. Additional participants in the process are external stakeholders. External stakeholders are represented by government agencies, creditors, investors, suppliers and consumers, company and others. External interested parties may send requests and proposals in writing, taking into account the requirements established by the legislation of the Republic of Kazakhstan, which the

Company considers and provides a response on the actions taken or the rejection of proposals.

26. External stakeholders expect the proper functioning of RMS in the Company, as their interests will be more protected with an effective RMS.

Chapter 5. The functions of the participants are the risk management process

27. The sole shareholder determines the basic principles of corporate governance.

28. The Company's Board of Directors plays a key role in overseeing RMS and performs the following functions in the field of risk management:

1) setting goals (short-term and long-term) of the Company:

2) approval of the Company's Risk Management Policy and other internal documents within the competence;

3) approval of the levels of responsibility for monitoring and controlling the Company's risks by approving this Policy;

4) analysis of the conclusions of external auditors on improving internal control and risk management and the results of audits conducted by the Internal Audit Service;

5) approval of the Company's register, risk map and risk management action plan (as part of the approval of quarterly risk management reports);

6) approval of key risk indicators (as part of the approval of quarterly risk management reports);

7) approval of risk management reports;

8) review of reports on the effectiveness of RMS;

9) determination of the forms and deadlines for submitting financial and management reports to the Board of Directors of the Company, providing an opportunity to analyze and evaluate the financial performance of the Company;

10) approval of the Company's risk appetite;

11) coordination of activities of collegial bodies, Management Board, committees, SD, internal audit service;

12) taking measures to reduce the likelihood of conflicts of interest in the functional responsibilities of managers;

13) verification of the fact of granting preferential terms to affiliated persons;

14) consideration analysis of the Company's current (future) equity needs;

15) consideration of the report of internal (external) auditors on the results of their audits, indicating the identified inconsistencies, as well as their recommendations;

16) consideration of the report of the Asset and Liability Management Board on the results of operations (transactions) carried out to invest the Company's assets (with grouping of financial instruments by type and indicating the book value, market value, profitability, amount of purchases and sales);

17) regular monitoring of the Company's activities through established committees, divisions and the internal audit service in order to exclude the possibility of transactions that contradict the strategy, policies, procedures and other internal documents, as well as in order to adjust them;

18) ensuring the organizational independence of the functions of the internal audit service;

19) limitation and establishment of restrictions on transactions (transactions);

20) monitoring the implementation of measures and other requirements of the authorized body, including the action plan to eliminate deficiencies (if necessary);

21) clarification of the reasons for non-fulfillment (non-removal) and the application of appropriate measures to responsible employees in case of non-fulfillment of the requirements of the authorized body, untimely elimination (non-removal) of identified deficiencies;

22) other issues related to the competence of the Board of Directors.

29. The Board of Directors makes decisions based on the Company's willingness to take risks. At the same time, decisions are made both on the allocation of financial resources and on other issues.

30. In order to implement effective risk management, committees established under the Company's Board of Directors may be assigned functions and powers to support the Board of Directors, which are determined by relevant internal regulatory documents.

31. The Management Board of the Company is responsible for organizing effective RMS and creating a risk control structure to ensure compliance and compliance with corporate policies. The Management Board is responsible for creating a culture of "risk awareness" (risk culture), which reflects the policy of risk management and the philosophy of the Company.

32. The Management Board encourages employees to participate in the decision-making process and openly discuss risks for strategic and operational purposes. The Management Board considers risks when making resolutions, which includes discussing and analyzing risk scenarios before making final resolutions.

33. The Management Board is also responsible for creating an effective RMS based on the fact that employees have clearly defined risk management responsibilities and are responsible for fulfilling their responsibilities. The Management Board has the right to carry out part of the functions in the field of risk management through the creation of appropriate committees.

34. The Board in order to ensure the integrity and proper functioning of the RMS:

1) carries out daily management of the Company in accordance with established goals and methods in terms of risk management and internal control;

2) approves the procedure for the transfer of information between the Board of Directors, collegial bodies, the Management Board and the SD of the Company, ensuring effective risk management and internal control;

3) implements the goals and objectives set by the Board of Directors, recommendations and comments of the Internal Audit Service, recommendations of the SD responsible for coordinating the risk management system, requirements and measures of the authorized body;

4) ensures the implementation and compliance with the provisions of this Policy by all employees of the Company;

5) Approves internal documents in order to implement the risk management and internal control policy;

6) defines guidelines for asset diversification, profitability, liquidity and capital adequacy, in order to ensure financial stability and compliance with the capital adequacy ratio provided for in the LSI on RMS;

7) ensures the adoption of effective measures to control compliance with the limits approved by the Board of Directors, as well as those provided for by the LSI on the RMS based on quarterly information from the SD responsible for coordinating the RMS on compliance with the limits;

8) ensures compliance of the tariff policy with the predicted trends in the development of risks based on reliable risk statistics and revision of the tariff policy every three years;

9) provides recommendations to the Board of Directors of the Company regarding the preparation of annual budgets, strategic plans, taking into account the current and future economic environment, regulatory framework, capital size;

10) conducts regular analysis of compliance with contractual relations, the requirements of the Law of the Republic of Kazakhstan on amendments and additions to certain legislative acts of the Republic of Kazakhstan on export credit agency and promotion of exports of non-primary goods (works, services), on joint stock companies, on the securities market, on countering the legalization (laundering) of proceeds from crime, and the financing of terrorism, internal documents of the organization regulating transactions with financial instruments;

11) monitors compliance with the SD policies in the management of possible and potential risks, the size of risks within the established limits;

12) provides analysis of changes in income (expenses) from transactions with financial instruments, taking into account the dynamics of their market value;

13) ensures that the Company's equity capital meets the required level in accordance with the LSI on the RMS;

14) ensures the improvement of the accounting and reporting system, taking into account the recommendations of external auditors;

15) analyzes audit reports and submits proposals to the Board of Directors on taking appropriate measures to eliminate the identified deficiencies;

16) on an annual basis, approves the work plan of the SD of the Company responsible for coordinating the risk management system;

17) on an annual basis, it provides the Company's Board of Directors with a Report of the Company's Management Board on the effectiveness of the risk management system no later than the fourth month following the reporting period;

18) determines the human capital needed to achieve strategic and operational goals, increase the level of competence of employees, form an effective system of incentives and assessments for employees to achieve long-term and short-term goals (with the assistance of the SD responsible for human resource management);

19) communicates with the Company's employees regarding the strategic vision of risk management, risk culture and compliance with risk management processes in order to ensure the integration of risk management into other business processes and the development of risk culture in the Company;

20) approves the matrix of business processes, risks and controls**;**

21) examines key risk indicators (hereinafter referred to as KRI) and the effectiveness of measures to manage significant risks**.**

35. In order to effectively organize risk management, collegial bodies may be established under the Company's Management Board, which may be assigned functions and powers to support the Company's Management Board, which are determined by relevant internal regulatory documents.

36. The SD of the Company responsible for coordinating the risk management system **is the 2nd line of the RMS,** whose main functions are:

1) organization and coordination of the corporate risk identification and assessment process, as well as coordination with the risk owners of the risk register and risk map, the matrix of business processes of risks and controls, key risk indicators, the Company's risk management action plan, as well as monitoring the timely and adequate implementation of the plan through meetings, discussions, and a set of data;

2) developing a risk management policy;

3) informing the Management Board of the Company and the Board of Directors of the Company about significant deviations in the risk management processes;

4) maintaining a database of realized risks, tracking external factors that may have a significant impact on risks;

5) preparation and submission of a quarterly risk management report to the Management Board of the Company and the Board of Directors of the Company;

6) participation in the organization of periodic assessment of risk management systems by making proposals for the assessment of the sub-component "Risk Management" as part of the diagnosis of the level of corporate governance;

7) development, implementation and improvement (if necessary) of the methodological base of RMS, policies and rules on identification, assessment and risk management of the Company, risk monitoring procedures;

8) stimulating risk communication in the Company**;**

9) ensuring the integration of risk management into other business processes and the development of a risk management culture in the Company;

10) providing methodological and consulting support to the Company's employees on risk management issues;

11) making proposals regarding conducting training seminars and trainings on risk management for the Company's employees;

12) interaction with the Company's Internal Audit Service in terms of forming an internal audit plan, exchanging information, discussing audit results **on RMS issues**, sharing knowledge and methodologies;

13) identification and assessment of risks, including the determination of descriptive and quantitative values of risk indicators related to the Company's activities, as well as the determination of the maximum permissible values of risk indicators;

14) organization of control over compliance with the established limits**;**

15) jointly with the risk owners, taking measures to manage risks arising in the course of the Company's activities;

16) monitoring, assessment and control of identified risks, drawing up a risk map, including:

taking measures together with other divisions of the Company to identify risks;

risk assessment, including assessment of the frequency of occurrence of risks, subsequent classification of the impacts of these risks;

risk monitoring, which includes monitoring changes in the values of risk indicators, as well as measures taken to minimize risks in case the values of risk indicators do not match the risk limits;

17) immediate reporting to the Board of Directors on any significant cases that may cause damage and (or) affect the Company's activities, or are of an illegal nature;

18) organization of the process for the development of a risk management action plan by the relevant departments of the Company and further monitoring of the risk management action plan approved by the Board of Directors of the Company;

19) development of an emergency plan and ensuring the continuity of the Company's activities together with the involved SDs;

20) regular analysis of financial indicators (within the framework of quarterly stress testing and regular monitoring of the level of accepted risks), the impact of price changes on financial instruments on liquidity, solvency, capital adequacy (within the framework of quarterly stress testing and regular monitoring of the level of accepted risks);

21) ensuring compliance of business units with approved internal risk management policies;

22) monitoring compliance with the requirements of the LSI on RMS;

23) annual assessment of the insurance, reinsurance and guarantee portfolio for the ability to withstand catastrophic events, which is submitted to the Board of Directors and the Management Board once a year as part of the Company's risk report;

24) as well as other functions that meet the specifics of the Company's activities.

37. The responsibilities, powers of the employees of the SD of the Company responsible for the coordination of RMS, and the reporting requirements are provided for in this Policy, the regulations on the SD responsible for the coordination of RMS, and the job descriptions of the employees of the SD of the Company responsible for the coordination of RMS.

38. Employees of the SD of the Company responsible for the coordination of RMS should interact with other departments, as well as external and internal auditors of the Company for the effective implementation of the goals and objectives of the risk management system.

39. Employees of the SD of the Company responsible for the coordination of RMS should have access to information, documents of the Company necessary to perform their functional duties specified in this Policy and job descriptions of these employees.

40. The integrated RMS is based on the vertical management of the SD responsible for the coordination of RMS, on the principle of functional identity and is provided through

management through authorized bodies of the Company.

41. The SD responsible for the coordination of RMS has the right to inform the Board of Directors of the Company about any significant cases that may cause damage and (or) significantly affect the Company's activities, or are of an illegal nature.

42. Senior employees of the Company and the heads of the SD are responsible for timely and complete communication to the SD responsible for coordinating the RMS of all necessary information related to risk assessment.

43. The Underwriting Board performs the following main functions in the risk management process:

1) making underwriting decisions within the limits set by the Board of Directors;

2) monitoring the adequate assessment of accepted risks;

3) ensuring an adequate insurance rate for the facility and the risks assumed for insurance and reinsurance;

4) ensuring an adequate amount of remuneration for the guarantee;

5) determination of the list of basic and additional conditions included in insurance, reinsurance and guarantee contracts.

6) making decisions on withholding, canceling or changing the amount of fines within the framework of concluded insurance and guarantee agreements;

7) establishment of categories of countries according to the internal classification of the Company;

8) preliminary consideration of issues related to insurance, reinsurance and guarantees, decision-making on which is within the limits of the Management Board, the Board of Directors, the Sole Shareholder of the Company;

9) consideration of monitoring reports, analytical reports and reviews, recommendations of the SD on insurance and reinsurance activities, on guarantee issues, as well as decision-making on other issues related to insurance, reinsurance activities, guarantee activities and management of the insurance portfolio and the portfolio of issued guarantees that do not contradict the legislation of the Republic of Kazakhstan, the Company's Charter and internal regulatory documents Societies.

44. The Asset and Liability Management Council of the Company (hereinafter referred to as the Council) performs the following main functions in the risk management process:

1) making investment decisions ;

2) making a decision on the implementation of insurance payments, reinsurance and guarantee payments, within the limits approved by the Board of Directors of the Company;

3) making decisions on setting over maximum limits for counterparty banks within the framework of the requirements of the Regulations for the Management of Financial Assets and Liabilities of the Company and recommended limits by the Holding;

4) consideration and provision of recommendations regarding loans, financial assistance and guarantees issued to the Company, as well as on debt financing;

5) review of the analysis of the financial condition of banks/counterparties/issuers of securities;

6) review of the analysis of the financial condition of reinsurers with whom reinsurance contracts have been concluded, analysis of payments received from reinsurers over the past five years and assessment of the expediency of reinsurance of insurance risks and analysis of the adequacy of own retention limits;

7) making a decision on choosing a broker/dealer/custodian in accordance with the Company's internal documents;

8) review of the report on the activities of the Asset and Liability Management Board;

9) making decisions on other issues related to the management of assets and liabilities of the Company that do not contradict the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company.

45. The Company's Internal Audit Service performs the following main functions in the

risk management process:

1) development of an annual audit plan;

2) audit and analysis of the effectiveness of risk management procedures and risk assessment methodology, as well as development of proposals to improve the effectiveness of risk management procedures;

3) assessment of the adequacy and effectiveness of internal control systems in all aspects of the Company's activities, providing timely and reliable information on the status of performance of assigned functions and tasks by departments, as well as providing effective and effective recommendations for improving work;

4) solving problems arising when the Board of Directors performs functions to ensure the availability and functioning of an adequate internal control system by providing an objective assessment of the state of the internal control system and recommendations for their improvement;

5) presentation of a report on the assessment of the effectiveness of RMS for the Board of Directors of the Company;

6) other functions in accordance with approved regulatory documents.

46. One of the important elements in the structure of the RMS is the SD of the Company represented by each employee and other employees who are not part of the SD, who are the first line. The SD and other who are not members of the SD should understand that they play a key role in the risk management process. The Company's employees work with risks on a daily basis, manage them and monitor their potential impact in the sphere of their functional responsibilities. The SD and other employees of the Company who are not members of the SD are responsible for the implementation of the risk management action plan, must promptly identify and inform about significant risks in their field of activity and make proposals on risk management for inclusion in the action plan.

47. The regulations on the SD and the job descriptions of the heads of the SD and also employees who are not members of the SD of the Company should reflect the functional responsibilities for managing risks related to business processes and tasks of these departments and employees, as well as the decisions they make.

48. The main functions of the SD, as well as employees who are not members of the SD of the Company in the risk management process, are:

1) timely high-quality self-assessment and identification of risks in your business process on a regular basis;

2) constant monitoring of the KRI and the emergence of new risks in its business process, making proposals on their entry into the risk register of the SD responsible for coordinating the RMS;

3) development of an action plan to minimize/manage risks in your business process jointly with the SD responsible for coordinating the RMS;

4) development together with the SD responsible for the coordination of RMS and monitoring of critical risks in its own business process;

5) They are responsible for providing timely, complete and reliable information on the state of risks and the implementation of risk management measures to the SD responsible for coordinating the Company's RMS;

6) ensure compliance with the approved risk appetite levels and risk limits when performing an operation within the framework of their activities;

7) participation in the development of methodological and regulatory documentation within their competence;

8) implementation of approved risk response measures;

9) facilitating the development of risk communication.

49. Employees of all SDs (also employees who are not members of the SD of the Company) undergo training and professional development at least once a year (training courses, seminars, etc.).

50. The risk management structure in the Company ensures an adequate flow of

information - vertically and horizontally. At the same time, the information coming from the bottom up provides the Board of Directors and the Management Board of the Company with information: on current activities; on risks assumed in the course of activities, their assessment, control, response methods and the level of their management. Top-down information ensures that goals, strategies and objectives are achieved through the approval of internal documents, regulations and instructions. The horizontal transmission of information implies the interaction of the SD and other employees of the Company and the interaction of the SD responsible for coordinating the RMS of the Company and the Holding.

Chapter 6. Defining goals and risk appetite

51. The Company is exposed to risks from external and internal sources, and the main condition for effective identification, assessment and development of risk management methods is setting goals. The objectives of the Company's activities are determined by the Company's Development Plan and establish the basis for the development of operational objectives.

52. The goals and objectives of the Company must correspond to the mission of the Company and are consistent with the risk appetite of the Company. Goals are defined before identifying potential risks that may negatively affect their achievement.

53. Risk appetite is aimed at integrating risk factors into the Company's management processes. Risk appetite reflects acceptable levels of risk by the Company's stakeholders, including shareholders, customers, the public, regulators and investors.

54. The risk level acceptable by the Company should be reflected in the risk appetite structure, which may include, but is not limited to, such components as efficiency, profitability and liquidity.

55. Annually, after preliminary consideration by the Company's Management Board, the Company's Board of Directors reviews and approves the risk appetite in order to ensure its compliance with the Company's Development Plan, the business environment and the requirements of stakeholders in accordance with the annex to the Policy.

56. Risk appetite is also an integral part of the Company's strategic planning and budgeting. The components of risk appetite are transformed into the operational activities of the Company through limits and targets, which are mandatory.

57. Limits are risk appetite parameters that the Company should not exceed. Another definition of limits is risk tolerance, that is, it is the level of risks that the Company is able to accept without significant damage to its activities, in other words, the Company should not accept risks greater than its level of tolerance.

58. At the same time, target levels can be set to determine the optimal level of risk that the Company should achieve.

59. When forming a risk appetite, all available information, both quantitative and qualitative, should be used in order to determine the optimal risk profile of the Company.

60. The main components of risk appetite, covering most aspects of risk management, are determined based on the specifics of the Company's activities.

61. The components for determining risk appetite, including::

– efficiency;
– capital adequacy;
– profitability;
– liquidity.

62. The risk appetite component "Efficiency" is an important component of the Company, due to the Company's need to maintain a balance between the Company's insurance premiums and insurance payments.

63. Capital adequacy is an important component due to the need to maintain an overall

balance between available capital and the Company's risk profile, and to maintain regulatory requirements (if any).

64. Profitability is an important component due to the need for the Company to achieve its strategic goals, taking into account, at least, the break-even of its activities.

65. Liquidity is an important component due to the need to ensure timely and complete fulfillment of its obligations.

66. The limitation for each of the components used is determined based on the principles of risk aversion and risk preference:

1) the principle of non-acceptance of an uncontrollable level of risk helps to determine the amount of risk that the Company is ready to assume, expressed in the variability (volatility) of profits and the amount of losses of the Company;

2) The principle of risk preference helps to determine the level and type of risks that the Company wants to take on in order to achieve strategic goals.

67. In their activities, the SD of the Company and employees are obliged to be guided by the principle of non-acceptance of an uncontrollable level of risk, while taking into account the risks in their activities in carrying out the main operations and functional tasks of a particular SD of the Company.

68. Each component may include various metrics that contribute to the evaluation of the components in question.

69. The Company's risks in forming a Development Plan and setting goals can be reduced by:

1) accounting of strategic and program documents of the Republic of Kazakhstan;

2) analysis of the external and internal environment;

3) definitions of risk appetite;

4) discussion and coordination of the Development Plan with the Holding, the SD and other employees of the Company, working groups;

5) setting targets for monitoring the effectiveness of the Company's activities and supporting the achievement of strategic goals.

70. The control is carried out as part of the overall control of the risk identification and assessment process.

Chapter 7. Risk identification

71. Risk identification is the determination of the Company's exposure to the impact of risks, the occurrence of which may negatively affect the ability to achieve planned goals and achieve set goals. The purpose of the risk identification procedure is to identify risks, include them in the Risk Register for further assessment, determine the KRI and develop a Risk Management Action Plan.

72. Each employee of the Company on an ongoing basis identifies and evaluates risks and related risk factors that affect the achievement of the goals and objectives set for the Company and in particular for each employee of the Company.

73. The Company's RMS is aimed at identifying a wide range of risks and considering them in a complex, which contributes to reflecting a holistic picture of existing risks and improves the quality of risk analysis.

74. In accordance with the best international risk management practice, the Company regularly (including when implementing internal documents, making corporate decisions, within the framework of the functional tasks of all employees and within the framework of the management reporting system) carries out risk identification with the participation of employees of all SDs, as well as employees outside the SD in order to identify maximize the range of risks, increase awareness of the surrounding risks and stimulate the development of the risk culture of the organization.

75. To identify risks, a combination of various techniques and tools is used, such as

risk identification based on strategic goals and objectives, expert analysis (including SWOT analysis, scenario analysis, industry and international comparisons), business process analysis, risk audit, interviewing and questionnaires, databases of potential and implemented risks, key risk indicators, statistical methods, seminars, discussions and other tools described in more detail in the Company's internal documents regulating the identification and assessment of the Company's risks.

76. Risk identification and analysis is carried out with the participation of the Company's SD managers and employees outside the SD, while the SD responsible for coordinating the RMS provides methodological and advisory support.

77. Identified events and risks are systematized in the form of a risk register. The Company's Risk Register is a list of risks that the Company faces in its activities, which also includes the possible consequences of the implementation of the risk. For each risk, the owners of the risk are identified, i.e. departments (also employees who are not part of the SD) who deal with this risk by virtue of their functional responsibilities. The risk Register may be supplemented by the SD and the Company's employees on an ongoing basis as new risks are identified. The SD and employees outside the SD are responsible for providing information to fill out the Company's risk register.

78. Systematization of identified risks allows:

1) to achieve consistency in the classification and quantification of risks, which makes it possible to improve the comparison of the risk profile (by SD business processes, projects, etc.);

2) provide a platform for building more sophisticated risk quantification technology tools;

3) to provide an opportunity for coordinated risk management and control in the Company.

79. The risks in the register are classified into categories according to Chapter 8.

Chapter 8. Risk classification

80. Risk identification and assessment are carried out in accordance with the Company's risk classification, which is regularly reviewed in terms of supplementing with new identified/potential risks.

81. Risk classification is based on the goals and strategies of the Company and represents the systematization of a variety of risks based on certain features and criteria that allow combining a variety of risks into general categories and subcategories in order to introduce a unified terminology in the field of risk management in the Company.

82. To classify risks in the Company and reflect them in the Risk Register, risks are grouped by category (for example, operational risks and strategic risks). If necessary, each risk category can be divided into subcategories depending on the content of the risk (for example, operational risks may include information technology risks and information security risks). In turn, each subcategory may contain an approximate list of factors or events that the Company faces or may face in the course of carrying out its activities. The list of risks and factors reflected in the Risk Register is not exhaustive and should be updated as information about risks becomes available when identifying new risks or changing the status of existing risks. Due to the specificity of the Company's activities, risk subcategories characteristic of the Company in the Company's Risk Register may be combined depending on belonging to a certain area.

83. The risk classification is presented (may include, but not limited to) by the following categories and subcategories:

1) Strategic risks are the risks of losses due to changes or errors (shortcomings) in determining and implementing the Company's business and development strategy, changes in the political environment, regional conjuncture, industry recession, and other external risk factors of a systemic nature. Strategic risk management is carried out at the level of each SD of the Company;

2) ESG risks (Environmental, Social and Governance) – the risk associated with non-compliance with the principles of environmental efficiency and environmental protection, social orientation and good corporate governance;

3) Reputational risk is a risk arising from a negative perception of the Company's activities by customers, counterparties, shareholders, investors, creditors, industry analysts, other stakeholders and regulatory organizations, which may adversely affect the Company's ability to maintain and improve its activities, as well as provide constant access to sources of financing;

4) Operational risks are the risks of failure to achieve set goals and objectives, as well as the occurrence of losses as a result of deficiencies or errors in the implementation of internal processes made by employees (including personnel risks), the functioning of information systems and technologies (technological risks), as well as due to external events. Operational risk management is carried out at the level of each SD of the Company;

5) Information technology risk is the probability of damage due to the unsatisfactory construction of processes related to the development and operation of information technology by the Company;

6) Information security risk is the probability of damage due to a violation of the integrity, confidentiality and accessibility of the Company's information assets, which arose as a result of deliberate destructive influence on the part of the Company's employees and (or) third parties;

7) Financial risks – the risk of expenses (losses) incurred by the Company as a result of borrowers violating their monetary obligations to the Company, the Company's failure to fulfill its obligations to creditors, adverse changes in market parameters (exchange rate, interest rate, cost of financial instruments).

Financial risks are classified into the following categories:

–Market risk is the risk of changes in the market value of financial assets due to negative changes in market conditions: fluctuations in interest rates, exchange rates, market prices of equity and debt financial instruments, as well as commodity contracts. Currency and interest rate risks are varieties of market risk;

–Currency risk is the risk of losses associated with fluctuations in the exchange rates of foreign currencies against the national currency and revaluation of the open currency position in value terms, in the course of the Company's activities. The risk of losses arises from the revaluation of the Company's positions in terms of currencies in value terms;

–Interest rate risk is the risk of losses due to adverse changes in interest rates. Interest rate risk is associated with the probability of losses if the terms of repayment/revaluation of the placed interest-bearing assets and the attracted interest-bearing liabilities of the Company do not match;

–Liquidity risk is the risk associated with possible non-fulfillment or untimely fulfillment by the Company of its obligations. When managing liquidity risk, the current liquidity of the Company is monitored, as well as the timing of the placed and attracted money, income and expenses related to the receipt (payment) of remuneration are compared;

–credit risks - the risk of losses due to non-fulfillment or improper fulfillment by the counterparty of its obligations on time and in full;

8) Legal risks - risks of losses due to non-compliance with the requirements of the legislation of the Republic of Kazakhstan, in relations with non-residents of the Republic of Kazakhstan - the laws of other states, as well as internal rules and procedures;

9) Compliance risk is the risk of an adverse outcome (application of legal sanctions, claims of an authorized state body, material financial loss, fraud, corruption or loss of reputation) due to non-compliance by the Company with the requirements of the legislation of the Republic of Kazakhstan, international standards applicable to the Company's activities, as well as internal rules and procedures. Compliance risk management is carried out at the level of each SD of the Company and an employee who is not a member of the SD.

84. The division of categories into areas is different for each Holding SUB, depending on the scope of its activities. The categorization of risks has an exclusively navigational function.

Chapter 9. Risk assessment

85. Risk identification and assessment are aimed at providing a common vision of existing risks and their size by implementing a basic ranking to identify the most "weak" places. This process allows an assessment of the methods and procedures used to manage the main risks.

86. Assessment of the probability of realization and the possible impact of risks allows you to develop an understanding of risks, provides the necessary informative basis for making decisions about the need to manage a certain risk, as well as the most appropriate and cost-effective strategies to reduce it.

87. According to the risks systematized in the risk register, the risk assessment process is carried out in order to identify the most significant (critical) risks that may negatively affect the Company's activities and the achievement of strategic goals and objectives. These risks are submitted for consideration by the Board of Directors, which must make decisions on the management and control of these risks.

88. As part of the risk assessment and analysis, the Company uses qualitative, quantitative analyses or a combination of them, which create a methodological basis for the risk management process.

89. Risk assessment includes consideration of the sources and causes of each risk, the negative consequences of their implementation, and the likelihood that a certain event will occur.

90. Initially, the risk assessment is carried out on a qualitative basis, then a quantitative assessment can be carried out for the most significant risks. Risks that cannot be quantified, there is no reliable statistical information for their modeling, or the construction of such models is not cost-effective, are assessed only on a qualitative basis.

91. All identified and assessed risks, which are systematized in the risk register, are reflected on the risk map. The risk map allows you to assess the relative importance of each risk (compared to other risks), as well as identify risks that are critical and require the development of measures to manage them.

92. Identification and assessment of the Company's risks in the complex is carried out in accordance with the relevant internal documents of the Company.

93. The Company evaluates individual risks using various quantitative methods such as VAR, gap analysis, historical simulation method, stress testing, key risk indicators (KRI) and so on.

Chapter 10. Internal criteria for evaluating the effectiveness of the risk management system

94. The effectiveness of the risk management system is assessed by the Internal Audit Service. The following indicators can be recognized as criteria for the effectiveness of a risk management system:

1) organization of risk management processes;
2) risk identification;
3) risk assessment;
4) risk management;
5) monitoring.

Chapter 11. Risk management

95. The Company determines the methods of responding to risk and develops a risk management plan that is consistent with the risk appetite of the Company.

96. Risk management is the process of developing and implementing measures to

reduce the negative effect and probability of losses or to receive financial compensation in the event of losses related to the risks of the Company's activities. To ensure the effectiveness of the process and reduce the costs of its implementation, the Company must focus on the risks that may have the most significant impact on its financial condition and the achievement of goals and objectives.

97. The choice of risk response methods and the development of a risk management action plan to ensure an acceptable level of residual risk includes the following response strategies:

1) risk reduction and control - exposure to risk through the use of preventive measures and planning of actions in case of risk realization, which includes changing the degree of probability of risk realization in the direction of reduction and changing the causes or consequences of risk realization in order to reduce the level of possible losses;

2) retention/acceptance of risk, implying that its level is acceptable to the Company, and the Company accepts the possibility of its manifestation, it is also possible to accept residual risk after applying measures to minimize it;

3) risk financing is the transfer/sharing of risk or partial transfer of risk to another party, including the use of various mechanisms (conclusion of contracts, insurance agreements, definition of structure) that allow the separation of responsibilities and obligations;

4) withdrawal (evasion) risk aversion/risk avoidance by deciding against continuing or taking an action that is the source of the risk;

5) subsequent impact is a strategy that provides for the impact on the consequences of the implementation of a risky event. This strategy is usually applied to risks characterized by a low level of manageability and/or a low probability of implementation. This type of strategy may include insurance, risk hedging, as well as the development of contingency plans, business continuity plans.

98. Risk reduction and control implies measures aimed at:

1) loss prevention – reduction of the probability of occurrence of a certain risk (loss);

2) loss control – reduction of the amount of loss in case of risk occurrence;

3) diversification is the distribution of risk in order to reduce its potential impact.

99. Risk reduction and control methods involve the introduction of procedures and processes in Companies aimed at reducing the possibility of losses.

100. Methods of reducing and controlling the Company's financial risks include setting limits on the level of accepted risk, in accordance with the Company's internal documents regulating the procedure for setting and calculating limits on types of risks.

101. The methods of reducing and controlling the legal risks of the Company are monitoring changes in the legislation of the Republic of Kazakhstan by the SD of the Company responsible for legal support/Compliance services, which, together with interested SDs, assess the impact of changes on the Company's activities and develop measures necessary for their adoption. Any document that regulates the Company's internal procedures or in accordance with which the Company has obligations must undergo mandatory examination.

102. Reduction and control of the Company's strategic risk is carried out by monitoring the implementation of approved short- and long-term plans and strategies, as a result of which corrective measures are taken, including to reflect changes in the internal and external environment.

103. The reduction and control of operational risks in the Company is carried out by analyzing established business processes and developing appropriate action plans for their improvement in accordance with the documents regulating the management of operational risks of the Company.

104. If the methods used to reduce and control risks are associated with the costs of the Company, and these costs are significant, the following analysis is carried out:

1) to what extent are these measures necessary, and can they be reduced by retaining and/or financing (transferring) risks;

2) what is the opportunity cost of the cost of activities compared to the cost of retaining/transferring risks.

105. Risk retention. During the identification and assessment of key risks, the risk appetite of the Company is calculated, which reflects the acceptable level of risk. At the same time, risk tolerance is determined, that is, this is the level of risks that the Company is able to accept without significant damage to its activities.

106. Financing (transfer) of risks includes the following tools:

1) insurance (for "pure" risks - risks, the occurrence of which entails only losses and cannot lead to income);

2) hedging (for "speculative" risks - risks, the implementation of which can lead to both losses and income);

3) transfer of risk under the contract (transfer of responsibility for risk to the counterparty for additional remuneration or a corresponding increase in the value of the contract);

4) conditional facility - access to bank financing on agreed terms upon the occurrence of certain events;

5) other alternative methods of financing risks.

107. The main distinguishing feature of these instruments is the presence of a "fee" for risk, which, accordingly, requires the optimal use of this tool in order to reduce the costs of the Company.

108. Risk avoidance/avoidance includes actions aimed at stopping or refusing to carry out operations that potentially lead to negative consequences for the Company.

109. The choice of the most appropriate option is made taking into account the balancing of the costs associated with a particular method, with the advantages that its use entails, and other direct and indirect costs.

110. The application of appropriate risk response measures and methods is described in the risk management action plan. This plan includes a list of necessary actions and responsible performers.

111. The basic financial principles of all treasury operations conducted by the Company are in order of priority:

1) security (safety of funds) - implies, among other things, compliance with the established internal documents of the Company on risk management related to the money management process;

2) liquidity (the ability to convert assets into cash as soon as possible);

3) profitability (the highest income that can be obtained subject to compliance with the principles of security and liquidity defined by this Policy).

112. The principles of security and liquidity prevail over the principle of profitability.

113. In order to ensure a high level of financial investment security, the Company forms portfolios of temporarily free liquidity according to criteria for minimizing the level of investment risk, while the Company can form both short-term and long-term portfolios of free liquidity.

114. The placement of funds is carried out in compliance with the established limits and restrictions in accordance with the internal documents of the Company approved by the authorized body of the Company, as well as the LSI on RMS.

115. The risks of insurance, reinsurance and guarantee are limited by the Board of Directors of the Company.

116. Control over compliance with the limits on the placement of funds is carried out by the SD carrying out treasury operations and the SD responsible for coordinating the RMS. The SD responsible for the coordination of RMS provides the Holding with monthly reports on compliance with maximum limits when placing funds.

117. Control over the implementation of the established limits of collegial bodies for decision-making on the conclusion of insurance, reinsurance and guarantee contracts is carried

out by the SD responsible for the coordination of RMS. The SDs initiating the transaction/operation are responsible for compliance with the established limits. The SD responsible for underwriting is responsible for complying with the limits within the established limits for the SD responsible for underwriting.

118. If the Company exceeds the established limits within the framework of the placement of funds, measures are taken in accordance with the internal regulatory documents of the Company regulating the procedure for the placement and management of funds.

119. If the Company exceeds the established limits under insurance, reinsurance and guarantee agreements, the SD responsible for coordinating the RMS submits this issue to a meeting of the Company's Management Board, where a decision is made on further actions to resolve the excess of the established limits.

120. In order to ensure the operational funding of the Holding and the Company, it is envisaged that financial resources can be redistributed by providing financing and issuing guarantees between the Holding and the Company. The specified financing and provision of guarantees is carried out without setting limits and restrictions, unless otherwise provided by the legislation of the Republic of Kazakhstan, the charters of the Holding and the Company.

121. Speculative transactions with foreign currency, i.e. transactions with foreign currency that are not conditioned by financial and economic/core activities, are strictly prohibited.

122. In order to minimize currency risks, the Company may consider the possibility of hedging by entering into transactions with derivative financial instruments and submit this issue for consideration by the authorized body of the Company.

123. In order to effectively manage the Company's obligations, the responsible departments of the Company carry out the following monitoring:

1) monitoring and analysis of types of borrowings in order to determine the liquidity of the volume of temporarily undeveloped borrowed funds and the possibility of using liquid instruments to provide a funding base;

2) monitoring the current status of assets and liabilities and other indicators in order to determine liquidity risk, as well as interest rate, currency and other risks.

124. In order to minimize compliance risks when establishing business relations with affiliated persons and persons associated with the Company by special relations, registers of affiliated persons and persons associated with the Company by special relations are formed in accordance with the internal documents of the Company in accordance with the internal documents of the Company.

125. The Company does not finance and provide guarantees to individuals and legal entities, unless otherwise provided by the legislation of the Republic of Kazakhstan, the charter of the Company, decisions of the Government of the Republic of Kazakhstan, with the exception of financing the Company and providing guarantees for the obligations of the Company.

Chapter 12. Control actions

126. After identifying the key risks and risk management measures, the main business processes exposed to these risks are identified. A step-by-step analysis of business processes is carried out to determine whether it is necessary to include appropriate control actions. In addition, an analysis of planned risk management measures is carried out, control actions and (or) indicators necessary to ensure the effective implementation of such measures are determined. Control actions are often a risk management method in themselves.

127. Control actions are policies and procedures that help ensure that risk management measures are implemented. Control actions are included in business processes at all levels of the Company. Control actions include a wide range of measures such as approval, authorization, verification, approval, analysis of transactions, asset security and allocation of responsibilities.

128. The responsibility for conducting an analysis of business processes and determining the need and expediency of additional control actions is borne by the risk owners - the heads of the relevant SDs of the Company, employees who are not members of the SD. The SD responsible for the coordination of RMS provides methodological support to owners and participants of business processes in the development and implementation of control procedures.

129. The results of risk identification and assessment are provided to the Management Board and the Board of Directors of the Company, as well as to the relevant committees, in the form of a risk management report, which includes information on critical risks, a risk management action plan, and proposals for improving existing measures.

130. On the basis of regular risk reporting, the Company monitors current risks and the implementation of risk response measures.

131. Employees and officials of the Company have the right to confidentially inform the Audit Committee of the Board of Directors or the Board of Directors of the Company about violations or incorrect execution of management or internal control procedures or other policies, as well as cases of fraud, violations of the legislation of the Republic of Kazakhstan.

Chapter 13. Information and communication

132. In the process of implementing each component of the RMS, information is exchanged between the SDs of the Company. All materials and documents prepared within the framework of the RMS are coordinated with interested SDs, who make their comments and suggestions. Proposals on the Company's risk appetite, an analysis of key risks and a risk management action plan are submitted to the Board of Directors at least once a year.

133. Information and communication in the Company make it possible to provide participants in the risk management process with reliable and timely information about risks, increases the level of awareness of risks, methods and tools for responding to risks. Relevant information is determined, recorded and provided in a form and within a time frame that allows employees to effectively perform their functions.

134. The SD of the Company, as well as employees who are not members of the SD, constantly monitor and inform the SD responsible for coordinating the RMS about the losses that have occurred. For each such case, an analysis of the causes of losses is carried out and measures are taken to prevent similar incidents in the future (a database on realized and potential risks).

135. The Company provides information on risk management to partners, creditors, external auditors, rating agencies and other interested parties (including as part of the annual report), while ensuring that the degree of detail of the disclosed information corresponds to the nature and scope of the Company's activities. The annual report reveals the degree of materiality of key risks, measures aimed at managing and minimizing key risks.

Chapter 14. Monitoring

136. The Company monitors the effectiveness of RMS (including existing management methods and risk controls) and, if necessary, its modification and improvement. Monitoring is carried out on a regular basis at least once a year.

137. The Company monitors and controls its risks in accordance with the basic principles, policies, rules and regulations established by the Board of Directors of the Company and the Management Board of the Company in accordance with their competence.

138. RMS monitoring is an important part of the entire business process and evaluates both the availability of such a system and the implementation of its components. Monitoring is carried out by constantly monitoring the implementation of policies, procedures and activities of the risk management system and targeted audits. The scale and frequency of targeted

inspections depends on the risk assessment and the effectiveness of ongoing monitoring. The shortcomings of the RMS should be brought to the attention of the Board of Directors and the Management Board of the Company.

139. The effectiveness of the Company's RMS is confirmed by the results of independent audits conducted by internal and/or external auditors or independent experts.

140. After approval by the Company's Board of Directors of the risk management and KRI action plans, the SD responsible for coordinating the RMS monitors the implementation of measures in accordance with the deadlines for the implementation of each event and monitoring the actual value of the KRI (the approach of the current KRI to the threshold value, or its violation).

141. On a quarterly basis, the SD responsible for the coordination of RMS submits a risk management report to the Company's Management Board. The Management Board submits a risk management report to the Company's Board of Directors on a quarterly basis, after preliminary consideration by the relevant committee under the Company's Board of Directors.

142. The risk management report should contain at least the following:

1) a risk register (identified risks; risks that may arise in the course of conducting current activities), a risk map and a risk management action plan;

2) information on the implementation of the risk management action plan (ongoing work to minimize and eliminate risks);

3) information on key risk indicators that can have a significant impact on the risk portfolio;

4) information on realized risks;

5) action plan to minimize risks;

6) information on significant deviations from established risk management processes (if any);

7) information on non-compliance with financial risk limits approved by the Company (if any);

8) information on compliance with regulatory requirements in the field of risk management (if any);

9) financial risk report in accordance with the rules on the management of certain types of financial risks approved by the authorized bodies of the Company;

10) risk appetite for the forecast year (once a year), adjusted risk appetite quarterly (if necessary);

11) a brief analysis of financial indicators for the reporting period;

12) adequacy and effectiveness of the risk management system.

143. The internal audit of the RMS and the verification of the execution of plans to eliminate deficiencies in the risk management and internal control system are carried out in accordance with the audit plan of the Internal Audit Service approved by the Board of Directors of the Company. The internal audit is conducted in accordance with the internal regulatory documents governing the internal audit process.

Chapter 15. Risk culture

144. Risk culture consists in understanding the essence of risk, awareness of its types, awareness of the importance of risk management processes in the Company at all levels of the RMS.

145. The presence of a risk culture in the Company implies:

1) support from the management of the Company on the issues of RMS and understanding of the importance of RMS;

2) the professionalism of the Company's employees on risk management issues within their competence;

3) responsibility of the Company's employees for the implementation of risk

management measures;

4) awareness of employees about the level of risks and possible measures to reduce them;

5) availability of a reporting system.

146. In order to comply with the risk culture of the Company with the criteria listed in paragraph 145 of this Policy, the following activities are carried out:

1) the management, managers and employees of the SD of the Company pay due attention to risk management issues when making decisions;

2) employees of the SD and senior employees of the Company are regularly trained in the field of risk management;

3) the Company's employees undergo mandatory familiarization with the principles of the functioning of the RMS.

147. Responsibility for the introduction of a risk culture and the implementation of the provisions of this Policy rests with the Management Board of the Company.

148. Control and responsibility for compliance with this Policy is assigned to the head of the SD responsible for coordinating the RMS and the heads of the SD of the Company in accordance with their official duties.

149. This Policy is subject to periodic review as necessary and is approved by the Board of Directors of the Company.

Chapter 16. Final provisions

150. Amendments and additions to this Policy are made in accordance with the procedure provided for by the Company's internal regulatory documents.

151. Issues not regulated in this Policy are regulated by the legislation of the Republic of Kazakhstan, including regulatory legal acts of the authorized body for regulation and supervision of the financial market and financial organizations, the Charter and other internal documents of the Company.

Annex
to the Risk Management Policy
of the Export Credit Agency of Kazakhstan JSC

Risk appetite form

Component	Metric	Limit	Target level
Component 1	Metric 1		
	…		
	Metric N		
…	Metric 1		
	…		
	Metric N		
Component N	Metric 1		
	…		
	Metric N		