

Information on the implementation of recommendations made based on the results of an internal analysis of corruption risks

Name of the object of internal analysis of corruption risks:

Department of Legal Support of «Export credit agency of Kazakhstan» JSC

The deadline for conducting an internal analysis of corruption risks is from December 4, 2023 to December 29, 2023.

Date of signing of the analytical report: January 8, 2024

Ser. No.	Recommendation	Activity completion Form	Information on the implementation of the recommendation
1.	An addition should be made to the Regulations of the Insurance Claims and Disputes Settlement Committee of the Company, approved by the resolution of the Company's Management Board dated December 3, 2021 (Minutes No. 72), providing for the obligation of members of collegial bodies to notify of a conflict of interest and take measures to resolve it in accordance with the internal regulatory documents of the Company and the legislation of the Republic of Kazakhstan.	Approved by the Management Board of «Export credit agency of Kazakhstan» JSC additions to the Regulations of the Committee for Settlement of Insurance Claims and Disputes of the Company approved by the resolution of the Management Board of the Company dated 3 December 2021 (Minutes No. 72)	Executed. By the decision of the Company's Management Board (Protocol No. 44 dated 05/15/2024), amendments and additions were made to the Regulations of the Insurance Claims and Disputes Settlement Committee of the Company, including paragraph 9-1 providing for the implementation of the directed recommendation of the Company's Compliance Service.

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Name of the object of internal analysis of corruption risks:

Department of Strategy and Economic Planning of «Export credit agency of Kazakhstan» JSC

The deadline for conducting an internal analysis of corruption risks is from December 4, 2023 to December 29, 2023.

Date of signing of the analytical report: January 8, 2024

Ser. No.	Recommendation	Activity completion Form	Information on the implementation of the recommendation
1.	Amend paragraphs 19 and 41 of the Company's Budgeting Regulations approved by the resolution of the Company's Management Board dated December 24, 2020 (Minutes No. 83), excluding the use of the wording "may".	Amendments and additions to the Company's Budgeting Regulations approved by the Board of «Export credit agency of Kazakhstan» JSC, approved by the decision of the Board of the Company dated December 24, 2020 (Minutes No. 83)	Executed. By the decision of the Board of the Company dated February 22, 2024 No. 15, amendments and additions No. 5 were made to the Budgeting Regulations of the Export Credit Agency of Kazakhstan JSC.
2.	Make an addition to paragraph 3) paragraph 17 of the Company's Budgeting Regulations, approved by the resolution of the Company's Management Board dated December 24, 2020 (Minutes No. 83), providing for the wording "if the supplier is a VAT payer" when submitting a budget application with price proposals excluding VAT and adding VAT to the cost of goods, works and services.		

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Name of the object of internal analysis of corruption risks:

Procurement Department of «Export credit agency of Kazakhstan» JSC

The deadline for conducting an internal analysis of corruption risks is from December 4, 2023 to December 29, 2023.

Date of signing of the analytical report: January 8, 2024

Ser. No.	Recommendation	Activity completion Form	Information on the implementation of the recommendation
1.	In the Instructions on the organization and conduct of purchases of goods, works and services in «Export credit agency of Kazakhstan» JSC, amend subparagraph 2) of paragraph 30, subparagraph 4) of paragraph 39 and paragraph 45, excluding the use of the phrases "entitled", "may".	Amendments and additions to the Instructions on the organization and conduct of purchases of goods, works and services in «Export credit agency of Kazakhstan» JSC approved by the Board of «Export credit agency of Kazakhstan» JSC	Executed. By the decision of the Board of JSC Export Credit Agency of Kazakhstan dated March 31, 2023 (Protocol No. 18), amendments and additions were made to the Instructions for Organizing and Conducting Purchases of Goods, Works and Services at JSC Export Credit Agency of Kazakhstan, approved by the decision of the Board of the Company dated April 28, 2022 (Protocol No. 26)

