

Analytical report on the results of the internal analysis of corruption risks in the activity Export Credit Agency of Kazakhstan JSC

Astana

November 1, 2024

1. The introductory part:

The full name of the object of internal analysis of corruption risks:

Department of Human Resources Management and Operations (formerly referred to as the Department of Human Resources Management) (hereinafter referred to as the Division) Export Credit Agency of Kazakhstan JSC (hereinafter referred to as the Company).

The basis for conducting an internal analysis of corruption risks:

1) Order of the Chairman of the Management Board of the Company dated 14.08.2024 No. 125-Θ "On conducting an internal analysis of corruption risks in Export Credit Agency of Kazakhstan JSC" (hereinafter - the Order);

2) Order of the Chairman of the Management Board of the Company dated 25.09.2024 No. 145-Θ "On Amendments to the Order dated 14.08.2024 No. 125-Θ "On Conducting an internal analysis of corruption risks in Export Credit Agency of Kazakhstan JSC".

The period of conducting an internal analysis of corruption risks:

from August 15, 2024 to October 17, 2024.

The analyzed period of activity of the object of internal analysis of corruption risks:

January 1, 2023 – August 31, 2024.

The internal analysis of corruption risks was carried out in accordance with paragraph 5 of Article 8 of the Law of the Republic of Kazakhstan "On Combating Corruption", the 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 (hereinafter referred to as the Standard Rules), Methodological Recommendations on Internal analysis of corruption risks in the activities of state bodies, organizations and quasi-public sector entities, approved by Order No. 488 of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption dated December 30, 2022 (hereinafter referred to as Methodological Recommendations), the Company's Anti-Corruption Policy approved by the decision of the Company's Management Board dated September 29, 2023 (Protocol No. 66), internal regulatory documents of the Company and the Order of the Chairman of the Management Board of the Company.

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

- Identification of corruption risks in the Company's internal regulatory documents;
- Identification of corruption risks in the organizational and managerial activities of the Company.

In accordance with the Order, the following composition of the working group on conducting an internal analysis of corruption risks in the Organization's activities was approved:

- Head of the working group: A.S. Zhakaeva, Head of the Compliance Service;

- Member of the working group: B.M. Tumenbayev, Chief Compliance Officer of the Compliance Service.

2. Identification of corruption risks in the Company's internal regulatory documents:

In order to identify corruption risks, the following internal regulatory documents (hereinafter referred to as IRD) were analyzed Companies that regulate the activities of the Division:

- 1) The rules for evaluating positions of KazakhExport EIC JSC, approved by the decision of the Board of the Company dated 27.04.2018 No. 407;
- 2) The regulation on the certification of employees of KazakhExport EIC JSC, approved by the decision of the Board of the Company dated 24.05.2018 No. 411;
- 3) The Code of Business Ethics of the KazakhExport Export Insurance Company Joint Stock Company, approved by the decision of the Board of Directors of the Company dated 31.05.2019 No. 5;
- 4) Rules of remuneration and bonuses, performance assessment of employees of the Internal Audit Service, Corporate Secretary, Compliance Controller, accountable to the Board of Directors of the KazakhExport Export Insurance Company Joint Stock Company (as amended on 25.09.2023), approved by decision of the Board of Directors of the Company on 24.04.2019 No. 3;
- 5) Rules for providing social support to employees of Export Credit Agency of Kazakhstan JSC (as amended on 28.06.2024), approved by the decision of the Board of Directors of the Company dated 05.06.2019 No. 18;
- 6) Rules for the provision of social support to senior employees and employees accountable to the Board of Directors of the Export Credit Agency of Kazakhstan Joint Stock Company (as amended on 09.08.2024), approved by the decision of the Board of Directors of the Company dated 24.04.2019 No. 3;
- 7) The Rules of the Internal labor Regulations of the KazakhExport Export Insurance Company Joint Stock Company (as amended on 13.08.2024), approved by the decision of the Management Board of the Company dated 28.06.2019 No. 23;
- 8) Rules of remuneration, performance assessment and remuneration of senior employees of the Export Credit Agency of Kazakhstan Joint Stock Company (as amended on 27.06.2024), approved by the decision of the Board of Directors of the Company dated 26.09.2019 No. 7;
- 9) Rules for evaluating the effectiveness of the employees of KazakhExport EIC JSC (as amended on 22.02.2024), approved by the decision of the Company's Management Board dated 24.12.2020 No. 83;
- 10) Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC, approved by the decision of the Board of the Company dated 26.03.2021 No. 21;
- 11) Rules for the selection of candidates for vacant positions of the Internal Audit Service, Compliance Service, Corporate Secretary, Actuarial Service, accountable to the Board of Directors of the Export Credit Agency of Kazakhstan Joint Stock Company (as amended on 04.06.2024), approved by the decision of the Board of Directors of the Company dated 24.08.2021 No. 8;
- 12) Rules for the adaptation and training of employees of the KazakhExport Export Insurance Company Joint Stock Company (as amended on 29.03.2024), approved by the decision of the Company's Management Board No. 88 dated 29.12.2022;
- 13) Rules on business trips of employees of KazakhExport EIC JSC (as amended on 29.03.2024), approved by the decision of the Board of the Company dated 27.06.2023 No. 42;

14) Rules of remuneration and bonuses for employees of the KazakhExport Export Insurance Company Joint Stock Company, approved by the decision of the Company's Management Board dated 29.09.2023 No. 66;

15) Regulations for the collection and processing of appeals to the Ombudsman of the KazakhExport Export Insurance Company Joint Stock Company, approved by the decision of the Company's Management Board dated 28.12.2023 No. 97;

16) Regulation on the Department of Human Resources Management and Operational Activities of the Export Credit Agency of Kazakhstan JSC, approved by the decision of the Board of the Company dated 25.09.2024 No. 90.

In the process of analyzing the norms of the above-mentioned internal regulatory documents of the Company regulating the activities of the Division and its organizational and managerial activities, the following discoveries were revealed.

2.1. Rules for providing social support to Employees of KazakhExport Export Insurance Company Joint Stock Company and Rules for providing Social support to Senior employees and Employees Accountable to the Board of Directors of KazakhExport Export Insurance Company Joint Stock Company:

The Working Group notes that the reference to the Decree of the Government of the Republic of Kazakhstan dated November 8, 2011 No. 1309 has lost its relevance due to the recognition of the specified normative legal act as invalid in accordance with the Decree of the Government of the Republic of Kazakhstan dated 16.03.2022 No. 129, while replacing the invalid act, by Order of the Minister of Health of the Republic of Kazakhstan dated February 16, 2022 No. KP ДСМ-14 approved a list of severe forms of certain chronic diseases, a reference to which is already available in the Rules for Providing Social Support to Executives and Employees Accountable to the Board of Directors of the KazakhExport Export Insurance Company Joint Stock Company.

At the same time, the Working Group notes that the reference to the expired Resolution of the Government of the Republic of Kazakhstan dated November 8, 2011 No. 1309 is also given in paragraph 5) paragraph 6 of the Resolution of the Government of the Republic of Kazakhstan dated December 2, 2014 No. 1266¹.

According to the Methodological Recommendations, legal acts and internal documents are studied in conjunction with other legal acts and internal documents.

Also, according to the Methodological Recommendations, a conflict of provisions of legal acts and internal documents is a factor of corruption risk – discrepancies or contradictions between individual legal acts, internal documents regulating the same or related legal relations, as well as contradictions arising in the process of law enforcement and the exercise by officials of the object of analysis of their powers.

Based on the above, the Working Group comes to the conclusion that it is necessary to exclude a contradiction between the Rules for Providing Social Support to Employees of the Company and the Rules for providing social Support to senior employees and employees accountable to the Board of Directors of the Company, that is, in paragraph 25 of the Rules for providing Social Support to Employees of the Company, to exclude a reference to an invalid regulatory legal act and bring it in line with the Rules for providing social support to Employees

¹ On determining the limits of certain types of administrative expenses of national management holdings (with the exception of the National Welfare Fund), national holdings and national companies whose controlling stakes are owned by the state, as well as national companies that are part of national management holdings (with the exception of national companies that are part of the National Welfare Fund group), national holdings and the mechanism for monitoring them and making amendments and additions to some decisions of the Government of the Republic of Kazakhstan

of the Company social support for senior employees and employees accountable to the Company's Board of Directors.

Recommendation:

The Department of Human Resources Management and Operations should update the Rules for Providing Social support to Employees of the KazakhExport Export Insurance Company Joint Stock Company in terms of bringing paragraph 25 of the Rules into line with the current regulatory legal act, as well as in accordance with the changed name of the Company and the current organizational structure of the Company.

2.2. The rules of the internal labor regulations of the Export Credit Agency of Kazakhstan Joint-Stock Company:

2.2.1. According to the Methodological Recommendations, legal acts and internal documents are studied in conjunction with other legal acts and internal documents.

Based on the above, the Working Group found that the list of documents listed in paragraph 12 of the Rules does not include a residence permit for a foreigner in the Republic of Kazakhstan or a certificate of a stateless person (for foreigners and stateless persons permanently residing in the territory of the Republic of Kazakhstan) or a refugee certificate.

Recommendation:

The Department of Human Resources Management and Operations should update the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company in accordance with paragraph 1 of Article 32 of the Labor Code of the Republic of Kazakhstan.

2.2.2. **Paragraph 32 of the Rules** defines the list of documents that make up the personal file of an employee of the Company.

A copy of the identity card/ passport/ candace certificate issued by the local executive body is indicated as the document that makes up the personal file of an employee of the Company.

The Working Group draws attention to the fact that in accordance with paragraph 10 of Article 7 of the Law of the Republic of Kazakhstan dated 11.12.2023 No. 44-VIII (effective from February 11, 2024), amendments and additions have been made to the Law of the Republic of Kazakhstan "On Personal Data and their Protection", according to which a **ban on the collection and processing of copies of documents is provided identification documents, on paper.**

In accordance with paragraph 1 of Article 32 of the Labor Code, it is established that an identity card of a citizen of the Republic of Kazakhstan or a passport of a citizen of the Republic of Kazakhstan (birth certificate for persons under the age of sixteen), a residence permit of a foreigner in the Republic of Kazakhstan or a certificate of a stateless person (for foreigners and stateless persons, permanent residents in the territory of the Republic of Kazakhstan) or a refugee certificate.

At the same time, in accordance with subparagraph 14 of paragraph 1 of Article 23 of the Labor Code, it is established that the **employer has the right to collect copies of documents certifying the identity of a labor immigrant** for the purposes provided for in the Labor Code.

According to the Methodological Recommendations, legal acts and internal documents are studied in conjunction with other legal acts and internal documents.

Taking into account the above, the Working Group believes that storing a copy of the employee's identity document in the employee's personal file, as well as the obligation to provide a copy of the updated identity document, contradicts the requirements of the legislation of the Republic of Kazakhstan "On Personal Data and their protection", while storing copies

of identity documents generated through the digital service is allowed documents and identity documents of labor immigrants.

Recommendation:

1) *The Department of Human Resources Management and Operations should send a request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere, regarding an explanation of the need to request a copy of an identity card from an employee, as well as storage in a personal file, taking into account paragraph 1 of Article 32 and subparagraph 14 of paragraph 1 of Article 23 of the Labor Code;*

2) *The Department of Human Resources Management and Operations should update the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company, taking into account the response of the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere.*

2.3. Rules for the adaptation and training of employees of KazakhExport Export Insurance Company JSC:

The Working Group has established the facts of non-compliance of the process of familiarization of the Company's employees with the internal regulatory documents of the Company with the norms of the Rules.

According to the Methodological Recommendations, discrepancies or contradictions between individual legal acts, internal documents regulating the same or related legal relations, as well as contradictions arising in the process of law enforcement activities and the exercise by officials of the object of analysis of their powers are an indicator of a conflict of provisions of legal acts and internal documents.

Recommendation:

The Department of Human Resources Management and Operations should update the Rules for adaptation and training of employees of KazakhExport EIC JSC in terms of compliance with the form "LIST OF FAMILIARIZATION WITH INTERNAL REGULATORY DOCUMENTS WHEN APPLYING FOR a JOB", given in Appendix 1 of the Rules, to documents used in the current recruitment process in the Company, as well as updating the list of internal regulatory documents specified in Annex 1 of the Rules.

2.4. Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC:

When analyzing the Rules, the Working Group established the following detections:

2.4.1. By the decision of the Board of Directors of the Company dated 09.08.2024 (Minutes No. 14) a new version of the organizational structure was approved, within which the Actuaries Service is accountable to the Board of Directors of the Company, and changes were made to the names of some structural divisions as the Department of Information and Communication and the Department of Human Resources Management, in this regard, the Working Group notes the need to update the Rules for selecting candidates for vacant positions in the Company in accordance with the new organizational structure of the Company.

2.4.2. The Working Group notes that, in accordance with the Rules, the heads of structural divisions/supervising managers are not the initiators of the search for candidates.

At the same time, the Rules do not regulate the process and timing of determining the need for candidates, namely, what serves as the basis for starting the procedure for searching and selecting candidates.

2.4.3. Paragraph 23 of the Rules does not provide for levels of definition of the assessment of professional knowledge, at the same time, paragraph 25 of the Rules provides for appropriate levels of assessment.

In view of the above, the reference to paragraph 23 in paragraph 17 of the Rules is incorrect.

According to the Methodological Recommendations, discrepancies or contradictions between individual legal acts, internal documents regulating the same or related legal relations, as well as contradictions arising in the process of law enforcement activities and the exercise by officials of the object of analysis of their powers are an indicator of a conflict of provisions of legal acts and internal documents.

Taking into account the above, the Working Group concludes that it is necessary to update the Rules for selecting candidates for vacant positions in the Company in accordance with the above findings.

Recommendation:

1) The Department of Human Resources Management and Operations should update the Rules for the selection of candidates for vacant positions in the Company in accordance with the findings specified in paragraphs 2.4.1.-2.4.3.;

2) The Department of Human Resources Management and Operations, together with the Department of Project Management and Information Technology, to consider the possibility of automating the process of searching and selecting candidates, taking into account paragraph 18 of the Rules for Selecting Candidates for vacant positions in the Company;

3) If there is a positive decision of the Department of Project Management and Information Technology to implement the process of searching and selecting candidates using automated information systems of the Company.

2.4.4. According to the Methodological Recommendations, in the direction of personnel management, the indicator of corruption risk is the lack of a mechanism for forming and protecting questions for conducting interviews and testing.

In accordance with the Methodological Recommendations, the activity of the object of analysis, resulting from its organizational and managerial activities, is transparency and publicity of activities.

Recommendation:

1) The Department of Human Resources Management and Operations shall regulate in the Rules for the Selection of candidates for vacant positions in the Company the procedure for the formation, storage and confidentiality of questions for testing in order to prevent their unauthorized dissemination and measures to protect them, as well as the format of testing in order to eliminate corruption risks;

2) The Department of Human Resources Management and Operations, together with the Department of Project Management and Information Technology, to introduce candidates to pass professional knowledge testing using automated information systems of the Company;

3) The Department of Human Resources Management and Operations, together with the Information Security Service, should consider the possibility of implementing measures to record/videotape the testing procedure or online testing using a proctoring system in order to ensure control over the testing procedure.

2.4.5. As part of the analysis of the Rules, the norms that do not provide for restrictions and prohibitions available in similar internal regulatory documents of the Company have been identified.

Recommendation:

The Department of Human Resources Management and Operations should update the Rules for the selection of Candidates for vacant Positions in the Company in terms of bringing into line with paragraphs 15 and 20 of the Rules for the Selection of Candidates for Vacant Positions of the Internal Audit Service, Compliance Service, Corporate Secretary, Actuaries, accountable to the Board of Directors of the Export Credit Agency of Kazakhstan Joint Stock Company".

2.4.6. According to paragraph 1) paragraph 2 of Article 103 of the Social Code of the Republic of Kazakhstan, the employer is obliged to post information on the availability of vacancies on the Electronic Labor Exchange within 5 (five) working days from the date of their appearance, indicating working conditions and pay, with the exception of vacant positions of civil servants, elected government positions, deputies of Parliament and maslikhats, judges of the Republic of Kazakhstan, persons in military service, employees of special state, law enforcement agencies and the state courier service, employees of the National Bank of the Republic of Kazakhstan and its departments, the authorized body for regulation, control and supervision of the financial market and financial organizations.

The Working Group notes that the Rules do not regulate the procedure and timing of posting information on the availability of vacancies on the Electronic Labor Exchange.

In accordance with paragraph 21 of the Methodological Recommendations, typical corruption factors include a legal gap, i.e. the absence of legal regulation of a particular issue in a legal act or internal document.

Recommendation:

The Department of Human Resources Management and Operations shall regulate in the Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC the procedure and timing of posting information about open vacancies of the Company on the portal of the Electronic Labor Exchange in accordance with the requirements of the Social Code of the Republic of Kazakhstan.

2.4.7. The Working Group believes that the deletion of information about previously posted vacancies does not comply with the principles of transparency and publicity in the Company's activities.

Recommendation:

The Department of Human Resources Management and Operations, together with the PR Service of the Company, to consider the possibility of creating an "Archive of vacancies" on the Company's Internet resource.

2.4.8. The Working Group conducted an analysis of questions for testing professional knowledge for candidates for their relevance, the results of which revealed inconsistencies in accordance with Annex 2 to this analytical report.

Recommendation:

The Department of Human Resources Management and Operations, together with the interested structural units, to update the test questions taking into account the identified detections.

3. Identification of corruption risks in the organizational and managerial activities of the Company.

In accordance with paragraph 18 of the Policy, organizational and managerial activities include the following issues:

- 1) personnel management, including staff turnover;
- 2) conflict of interest settlement;

3) compliance of the activities of the IRD Division of the Company and the legislation of the Republic of Kazakhstan.

3.1. The facts of occupation of a position directly subordinate to a position held by close relatives, spouses, relatives during the analyzed period have not been established.

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

3.2. In 2023 and until August 31, 2024, employees of the Division were not brought to disciplinary responsibility, complaints and reports of illegal actions of employees of the Division through hotline channels, as well as as a result of direct appeals to the management of the Company were not received.

3.3. In the reporting period, there was no conflict of interest in the activities of the Division.

3.4. The facts of non-compliance of the IRD of the Company with the legislation of the Republic of Kazakhstan in the activities of the Division are given in the results of the analysis in the direction "Identification of corruption risks in the internal regulatory documents of the Company".

3.5. During the analyzed period, training was conducted for employees of the Department:

1) 28.02.2023 on the topic "Anti-corruption restrictions and standards in the quasi-public sector";

2) 23.06.2023 on the topic "Business processes of a company exposed to fraud risks";

3) On 22.11.2023 on the topic "Legislation of the Republic of Kazakhstan on combating corruption and fraud and the application of its norms in the current activities of the company";

4) On 14.05.2024 on the topic "On guarantees of protection and non-prosecution of employees of Export Credit Agency of Kazakhstan JSC and persons reporting information on cases of corruption or fraud in the Company."

4. CONCLUSION:

Based on the results of the analysis of IRD affecting the activities of the Division, recommendations are given on updating, making changes/additions to the following internal regulatory documents of the Company:

1) Rules for providing social support to employees of KazakhExport Export Insurance Company Joint Stock Company;

2) Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company;

3) Rules for the adaptation and training of employees of KazakhExport Export Insurance Company JSC;

4) Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC.

The Department also received recommendations on improving the business processes of personnel management, in particular:

1) jointly with the Department of Project Management and Information Technology to consider the possibility of automating the process of searching and selecting candidates, taking into account paragraph 18 of the Rules for Selecting candidates for vacant positions in the Company;

2) if there is a positive decision of the Department of Project Management and Information Technology to implement the process of searching and selecting candidates using automated information systems of the Company;

3) jointly with the Department of Project Management and Information Technology, to introduce candidates to pass professional knowledge testing using automated information systems of the Company;

4) jointly with the Information Security Service, consider the possibility of implementing measures to record/videotape the testing procedure or online testing using a proctoring system in order to ensure control over the testing procedure;

5) jointly with the PR service of the Company, consider the possibility of creating an "Archive of vacancies" on the Company's Internet resource;

6) jointly with the interested structural units, to update the test questions taking into account the identified detections.

Based on the results of the Analysis of the organizational and managerial activities of the Unit, no corruption risks were identified.

Approved by

Chairman of the Management Board of Export Credit Agency of Kazakhstan JSC
A. Chaizhunusov

Director of the Department of Human Resources Management and Operations
A. Kenessova

November 15, 2024

**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 in the Export Credit Agency of
Kazakhstan JSC (hereinafter referred to as the Action Plan)
Department of Human Resources Management and Operations of the Company**

(as amended on 03/31/2025)

S/p No.	Recommendation	Activity	Activity completion form	Performers	Activity deadline
1.	The Department of Human Resources Management and Operations should update the Rules for Providing Social support to Employees of the KazakhExport Export Insurance Company Joint Stock Company in terms of bringing paragraph 25 of the Rules into line with the current regulatory legal act, as well as in accordance with the changed name of the Company and the current organizational structure of the Company.	Amendments/additions to the Rules for Providing Social Support to Employees of the KazakhExport Export Insurance Company Joint Stock Company	Amendments/additions approved by the authorized body of the Company to the Rules for Providing Social Support to Employees of the KazakhExport Export Insurance Company Joint Stock Company	Department of Human Resource Management and Operations	January 2025
2.	The Department of Human Resources Management and Operations should update the Rules	Amendments/additions to the Rules of the Internal Labor Regulations of	Amendments/additions approved by the authorized body of the Company to the Internal Labor Regulations of	Department of Human Resource Management and Operations	January 2025

	of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company in accordance with paragraph 1 of Article 32 of the Labor Code of the Republic of Kazakhstan.	the Export Credit Agency of Kazakhstan Joint Stock Company	the Export Credit Agency of Kazakhstan Joint Stock Company		
3.	The Department of Human Resources Management and Operations should send a request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere, regarding an explanation of the need to request a copy of an identity card from an employee, as well as storage in a personal file, taking into account paragraph 1 of Article 32 and subparagraph 14 of paragraph 1 of Article 23 of the Labor Code.	Sending a request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere	An officially sent request to the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere	Department of Human Resource Management and Operations	December 2024
4.	The Department of Human Resources Management and Operations should update the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company, taking into account the response of the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere.	Based on the results of the implementation of the recommendation of paragraph 3 of this Action Plan, amendments/additions to the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company (<i>if necessary</i>)	Amendments/additions approved by the authorized body of the Company to the Rules of the Internal Labor Regulations of the Export Credit Agency of Kazakhstan Joint Stock Company or an explanation from the authorized state body of the Republic of Kazakhstan, which carries out management in the social and labor sphere, on the need to request a copy of an identity card from an employee when concluding an employment contract	Department of Human Resource Management and Operations	February 2025
5.	The Department of Human Resources Management and Operations should update the Rules for adaptation and training of employees of KazakhExport EIC JSC in terms of compliance with the form "LIST OF FAMILIARIZATION WITH	Amendments/additions to the Rules of adaptation and training of employees of KazakhExport EIC JSC	Amendments/additions approved by the authorized body of the Company to the Rules of adaptation and training of employees of KazakhExport EIC JSC	Department of Human Resource Management and Operations	January 2025

	INTERNAL REGULATORY DOCUMENTS WHEN APPLYING FOR a JOB", given in Appendix 1 of the Rules, to documents used in the current recruitment process in the Company, as well as updating the list of internal regulatory documents specified in Annex 1 of the Rules.				
6.	The Department of Human Resources Management and Operations should update the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC in accordance with the findings specified in paragraphs 2.4.1.-2.4.3. Analytical information	Amendments/additions to the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Department of Human Resource Management and Operations	February 2025
7.	The Department of Human Resources Management and Operations, together with the Department of Project Management and Information Technology, should consider the possibility of automating the process of searching and selecting candidates, including candidates passing professional knowledge testing using automated information systems of the Company with the possibility of implementing measures to record/videotape the testing procedure	Sending an application to the Department of Project Management and Information Technology to automate the process of searching and selecting candidates, including candidates passing professional knowledge testing using automated information systems of the Company with the possibility of implementing measures for recording/video recording of the testing procedure	Application to the Department of Project Management and Information Technology for automation of the process of searching and selecting candidates, including candidates passing professional knowledge testing using automated information systems of the Company with the possibility of implementing measures for recording/video recording of the testing procedure	Department of Human Resource Management and Operations	December 2024
		Integration of the Simbase Information System with the Unified Career Portal of NMH Baiterek JSC in terms of the search and selection of candidates for the Company	Certificate of commissioning	Department of Project Management and Information Technology	September 2025

8.	The Department of Human Resources Management and Operations shall regulate in the Rules for the Selection of candidates for vacant positions in the Company the procedure for the formation, storage and confidentiality of questions for testing in order to prevent their unauthorized dissemination and measures to protect them, as well as the format of testing in order to eliminate corruption risks.	Amendments/additions to the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Department of Human Resource Management and Operations	February 2025
9.	The Department of Human Resources Management and Operations should update the Rules for the selection of Candidates for Vacant Positions in the Export Credit Agency of Kazakhstan JSC in terms of bringing into line with paragraphs 15 and 20 of the Rules for the Selection of Candidates for Vacant positions of the Internal Audit Service, Compliance Service, Corporate Secretary, Actuaries accountable to the Board of Directors of the Export Credit Agency of Kazakhstan Joint-Stock Company.	Amendments/additions to the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Department of Human Resource Management and Operations	February 2025
10.	The Department of Human Resources Management and Operations shall regulate in the Rules for the selection of candidates for vacant positions in KazakhExport Export Insurance Company JSC the procedure and timing of posting information about open vacancies of the Company on the portal of the Electronic Labor Exchange in accordance with the requirements of the Social Code of the Republic of Kazakhstan.	Amendments/additions to the Rules for the selection of candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Amendments/additions approved by the authorized body of the Company to the Rules for the selection of Candidates for vacant positions in the Export Credit Agency of Kazakhstan JSC	Department of Human Resource Management and Operations	February 2025

11.	The Department of Human Resources Management and Operations, together with the PR Service of the Company, to consider the possibility of creating an "Archive of vacancies" on the Company's Internet resource.	Sending a memo to the PR service regarding the possibility of creating an "Archive of vacancies" on the Company's Internet resource.	A memo to the PR service regarding the possibility of creating an "Archive of vacancies" on the Company's Internet resource.	Department of Human Resource Management and Operations	December 2024
		Creation of the "Archive of vacancies" section on the Internet resource of the Export Credit Agency of Kazakhstan JSC.	The supplier's report on the services actually rendered during the reporting period as part of the site's technical support services	PR service	January 2025
12.	The Department of Human Resources Management and Operations, together with the interested structural units, to update the test questions taking into account the identified detections.	Sending a memo to the interested structural units about the need to update the test questions.	Memos from interested structural units with updated test questions.	Department of Human Resource Management and Operations	December 2024