

Information on the implementation of the Compliance Service Work Plan for 2025

No.	Name of the action in accordance with the Plan for 2025	Deadline for execution of the action established by the Plan	Form of completion determined by the Work Plan	Requisites of the document confirming the execution (No. and date)	Information on the implementation of the action
1	Formation and maintenance of the register of affiliated persons of JSC "Export Credit Agency of Kazakhstan" (hereinafter referred to as the Company), as well as timely placement of information on affiliated persons on the Internet resource of the Financial Statements Depository and in the "SimBase" database of JSC "National Managing Holding "Baiterek"	Quarterly - for the Financial Statements Depository	Notification of the results of processing the electronic report received by the server of JSC "Information-Accounting Center"	Notification No. 15473 on the results of processing the electronic report received by the server of JSC "Information-Accounting Center"; Notification No. 16182 on the results of processing the electronic report received by the server of JSC "Information-Accounting Center"; Notification No. 16946 on the results of processing the electronic report received by the server of JSC "Information-Accounting Center"; Notification No. 18097 on the results of processing the electronic report received by the server of JSC "Information-Accounting Center"	Implemented
		Monthly - for JSC "National Managing Holding "Baiterek"	Formed register of affiliated persons of the Company	the update of the register of affiliated persons in SimBase of JSC "National Managing Holding "Baiterek" is performed on a monthly basis by the 5th day of the reporting month	Implemented
2	Formation of the annual report on the effectiveness of compliance risk management	1st quarter of 2025	Annual report on the effectiveness of compliance risk management in the Company, approved by	Extract from the Minutes of the in-person meeting of the Board of Directors of the Company No. 02 dated 26.02.2025	Implemented

			the Board of Directors of the Company		
3	Formation and submission of the report on the work of the Compliance Service	quarterly	Extract from the minutes of the Board of Directors of the Company	Extract from the Minutes of the in-person meeting of the Board of Directors of the Company No. 01 dated 15.01.2025; Extract from the Minutes of the in-person meeting of the Board of Directors of the Company No. 08 dated 23.05.2025; Extract from the Minutes of the in-person meeting of the Board of Directors of the Company No. 12 dated 29.07.2025; Extract from the Minutes of the in-person meeting of the Board of Directors of the Company No. 16 dated 31.10.2025	Implemented
4	Formation of reporting information on the implemented actions for the realization of anti-corruption standards	quarterly	Reporting information for JSC "National Managing Holding "Baiterek"	Letter Ref. No. 04-10/5 dated 05.01.2025; Letter Ref. No. 04-09/841 dated 03.04.2025; Letter Ref. No. 04-10/1682 dated 02.07.2025; Letter Ref. No. 04-09/2519 dated 03.10.2025	Implemented
5	Preparation and consolidation of data for the report on actions implemented during 2024 to minimize corruption risks in the activities of the Company	no later than April 15	Reporting information for the Agency of the Republic of Kazakhstan for Anti-Corruption (Anti-Corruption Service)	Covering letter Ref. No. 04-09/784 dated 28.03.2025	Implemented
6	qualitative indicators for assessing the risk of the Company's vulnerability to risks of legalization (laundering) of proceeds of crime and terrorist financing	no later than April 15	Reporting information for the Agency of the Republic of Kazakhstan for Regulation and	Covering letter Ref. No. 04-09/168 dated 22.01.2025	Implemented

			Development of the Financial Market		
Actions to organize anti-corruption and anti-fraud measures					
7	Monitoring and control over compliance by the Company's officers with the anti-corruption restrictions adopted by them	during the year	Written statements, other supporting documents	Anti-corruption restrictions were signed by officers on 01.10.2025 and 28.02.2025	Implemented
8	Conducting an assessment of the effectiveness of control procedures for anti-fraud and anti-corruption in the activities of the Company	during the year	Internal memorandum and (or) report	The report was provided to the members of the Public Council. Extract from the minutes of the meeting of the Public Council of the Company dated 29.08.2025 No. 3	Implemented
9	Conducting internal training and testing of knowledge on topics related to anti-corruption and prevention of corruption and fraud risks	within the deadlines provided by the approved schedule of internal staff training	Minutes of internal training, written testing results	Protocol on conducted training dated 11.04.2025, Report on conducted testing dated 22.04.2025; Protocol on conducting training dated 01.07.2025, Report on conducted testing dated 11.07.2025; Protocol on conducting training dated 28.08.2025, Report on conducting testing dated 22.09.2025; Protocol on internal training dated 10.11.2025, Report on testing dated 25.11.2025	Implemented
10	Conducting anti-corruption expertise of internal regulatory documents (drafts)	As drafts of internal regulatory documents are received (developed)	Compliance opinions/approval sheets	For the first quarter of the current year, 12 drafts of internal regulatory documents were reviewed; For the second quarter, 27 drafts of internal regulatory documents were reviewed;	Implemented

				For the third quarter, 12 drafts of internal regulatory documents were reviewed. This information and supporting documents are provided in quarterly reports for consideration by the Board of Directors of the Company	
11	Monitoring of the implementation of financial control measures over compliance by officers and employees of the Company, as well as their spouses, with the requirements of tax legislation on the submission of declarations of income and property/declarations of assets and liabilities	once a year before September 15	Declarations of assets and liabilities and (or) declarations of income and property	Based on the results of the monitoring, it was established that the officers and employees of the Company, to whom the corresponding provisions of the Tax Code apply, taking into account the amendments provided for by the Law of the RK dated July 15, 2025 No. 208-VIII "On introducing amendments and additions to the Code of the RK 'On Taxes and Other Mandatory Payments to the Budget' (Tax Code) and the Law of the RK on issues of its enactment," timely fulfilled their obligations to submit tax declarations in the prescribed manner	Implemented
12	Conducting verification of clients and counterparties of the Company for affiliation and reliability	as corresponding requests are received from structural subdivisions	Compliance opinions	For the first quarter, 79 compliance opinions were prepared; For the second quarter, 115 compliance opinions were prepared;	Implemented

				For the third quarter, 141 compliance opinions were prepared; For the fourth quarter, 129 opinions were prepared.	
13	Conducting an analysis of budget requests of administrators of budget items from among employees and structural subdivisions of the Company on the subject of preventing risks of corporate fraud and abuse (creation of artificial business needs, inflation of budget requests)	at least once a year	Internal memorandums and (or) opinions	Internal memorandum No. 8472-VN dated 25.11.2025	Implemented
14	Conducting an internal analysis of corruption risks in the operational and business processes of the Company	during the year	Analytical report	By the Order of the Acting Chairman of the Management Board of the Company No. 177-Θ dated 05.11.2025, the period for conducting the internal analysis of corruption risks was established from 05.11.2025 to 18.12.2025; On 30.12.2025, it was formed and signed	Implemented
15	Conducting anti-corruption monitoring of the activities of the Company's structural subdivisions	quarterly	Analytical report on the results of anti-corruption monitoring	Analytical report on the results of anti-corruption monitoring for the first quarter, conducted for the period from 31.03.2025 to 03.04.2025; Analytical report on the results of anti-corruption monitoring for the second quarter,	Implemented

				conducted for the period from 30.06.2025 to 02.07.2025; Analytical report on the results of anti-corruption monitoring for the third quarter, conducted for the period from 29.09.2025 to 03.10.2025.	
16	Implementation of the International Standard ISO 37001:2016 "Anti-bribery management systems" in the activities of the Company	no later than December 31	Certificate of conformity	Based on the results of the certification audit conducted by the Branch of LLC "CERT INTERNATIONAL" in the Republic of Kazakhstan, the compliance of the Company's activities with the requirements of the international standard ISO 37001:2016 was confirmed. According to the results of the audit, certificate of conformity ABMS-2240/A was issued on 09.12.2025 with a validity period until December 08, 2028, registered in the international database of accredited certificates (www.iafcertsearch.org). Additionally, certificate of conformity No. KZ.Q.01.0064.C25.16382 was issued on 09.12.2025, confirming the compliance of the Company's activities with the requirements of the national standard ISO 37001:2017 with a validity period until December 08, 2028.	Implemented
Actions to implement internal control on anti-money laundering (combating the legalization of proceeds of crime and terrorist financing)					

17	Timely sending of notifications on transactions subject to financial monitoring to the authorized state body for financial monitoring	within the deadlines established by the legislative and regulatory legal acts of the Republic of Kazakhstan on anti-money laundering (combating the legalization of proceeds of crime and terrorist financing)	Information placed on the Internet resource of the authorized state body for financial monitoring	Transactions subject to financial monitoring were not sent due to their absence	Implemented
18	Conducting internal training and testing of knowledge on topics related to the process of anti-money laundering (combating the legalization of proceeds of crime and terrorist financing)	within the deadlines provided by the approved schedule of internal staff training	Minutes of internal training, written testing results	1. Protocol on conducted training dated 28.03.2025; 2. Protocol on conducted training dated 28.03.2025, Report on conducted testing dated 23.04.2025; 3. Protocol on conducting training dated 28.03.2025, Report on conducting testing dated 22.04.2025; 4. Protocol on conducted training dated 11.06.2025; 5. Protocol on conducted training dated 15.07.2025; 6. Protocol on conducted training dated 27.11.2025, Report on conducted testing dated 12.12.2025	Implemented
19	Conducting compliance verification of formed client files and questionnaires for their completeness and compliance with the requirements of regulatory	at least 2 (two) times a year	Opinions and/or reports on the results of the compliance verification	Compliance verifications were carried out for the period from 01.01.2025 to 17.03.2025 and from 03.12.2025 to 31.12.2025.	Implemented

	legal acts in the field of anti-money laundering (combating the legalization of proceeds of crime and terrorist financing)			Based on the results, opinions on the conducted compliance verification were formed.	
Other areas of monitoring and compliance risk management					
20	Participation in meetings of the Compliance Council under the authorized financial monitoring body, the Public Council of the Company, working groups under the Association of Financiers of Kazakhstan	as meetings are convened and working groups are formed	Minutes or materials of meetings	Extracts from the minutes of the meeting of the Public Council of the Company dated 29.08.2025 No. 3.	Implemented
21	Monitoring of the current legislation of the Republic of Kazakhstan and notification of the Company's structural subdivisions on introduced changes and additions to legislative and regulatory legal acts that affect the activities of the Company	weekly	Prepared legislative reviews for the Company's structural subdivisions	09.01.2025 No. 188-VN; 16.01.2025 No. 373-VN; 23.01.2025 No. 504-VN; 30.01.2025 No. 651-VN; 07.02.2025 No. 876-VN; 14.02.2025 No. 1062-VN; 20.02.2025 No. 1189-VN; 27.02.2025 No. 1375-VN; 06.03.2025 No. 1589-VN.	Implemented
22	Conducting compliance expertise of materials prepared by the Company's structural subdivision for insurance and guarantee payments	as corresponding materials and requests are received	Acts/opinions/approval sheets	In the second quarter, the Company made 2 (two) insurance payments for a total amount of 3,741,090,067.10 tenge, including: 1. For the insured event of "Kaz-Ir Agro" LLP, the beneficiary being "Development Bank of Kazakhstan" JSC, for the amount of 639,797,429.00 tenge under the voluntary loan insurance contract No. DS_3-2023-139 dated October 24, 2023. 2. For the insured event of "Khlopkoprom-Celluloza" LLP, the beneficiary being "Halyk Bank of Kazakhstan" JSC, for	Implemented

				the amount of 3,101,281,638.10 tenge under the voluntary loan insurance contract No. DS_3-2021-257 dated December 14, 2021. Based on the results of studying the materials submitted on the specified insurance... [text cut off]	
23	Monitoring, analysis, and assessment of the situation regarding economic and political sanctions applied by individual states and international organizations in order to identify potential compliance risks for the current activities of the Company	during the year	Internal memorandums, analytical reports	In the first quarter, internal memorandum No. 1435-VN dated 28.02.2025 was prepared. In the second quarter, internal memorandum No. 4257-VN dated 09.06.2025 was prepared. In the third quarter, internal memorandum No. 6892-VN dated 23.09.2025 was prepared. In the fourth quarter, internal memorandum No. 7896-VN dated 04.11.2025 was prepared.	Implemented