

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

Name of the object of internal analysis of corruption risks: Joint-Stock Company "Export Credit Agency of Kazakhstan" (Reinsurance Department)

Period of the internal analysis of corruption risks: from November 5 to December 26, 2025.

Date of signing the analytical report: January 14, 2026.

No.	Recommendation based on the results of the internal analysis of corruption risks	Form of completion according to the action plan	Information on the implementation of the recommendation
1.	Update the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan" to include provisions from the Order of the Minister of Trade and Integration of the Republic of Kazakhstan dated March 29, 2024 No. 158-NK "On approval of conditions for conducting certain types of activities of the Export Credit Agency of Kazakhstan" establishing requirements for interaction with counterparties within reinsurance activities.	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated June 24, 2026 (Minutes No. 11), Amendments and Additions No. 1 were made to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Board of Directors of the Joint-Stock Company "Export Credit Agency of Kazakhstan" dated June 27, 2024 (Minutes No. 11).
2.	Ensure compliance of subparagraph 2) of paragraph 15 of the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan" with subparagraph 2) of paragraph 1 of the Resolution of the Board of the National Bank of the Republic of Kazakhstan dated October 29, 2018 No. 270 "On establishing requirements for the minimum size of the authorized and equity capital of an insurance broker, the procedure for forming assets of a branch of a non-resident insurance broker of the Republic of Kazakhstan accepted as a reserve, and their minimum size, and approving the Rules for conducting insurance broker activities".	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated June 24, 2026 (Minutes No. 11), Amendments and Additions No. 1 were made to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Board of Directors of the Joint-Stock Company "Export Credit Agency of Kazakhstan" dated June 27, 2024 (Minutes No. 11).

3.	The Reinsurance Department shall make an amendment to subparagraph 3) of paragraph 15 of the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", excluding the requirements for the work experience of insurance brokers and the work experience of insurance brokers in the lines of insurance of the Company.	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated June 24, 2026 (Minutes No. 11), Amendments and Additions No. 1 were made to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Board of Directors of the Joint-Stock Company "Export Credit Agency of Kazakhstan" dated June 27, 2024 (Minutes No. 11).
4.	Ensure the updating of paragraph 27 of the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", which provides for the submission of reporting to the authorized body of the Republic of Kazakhstan in the field of trade regulation, taking into account the enacted Order of the Minister of Trade and Integration of the Republic of Kazakhstan dated September 30, 2025 No. 280-OD "On approval of the list, forms, terms, and procedure for submitting reports by the Export Credit Agency of Kazakhstan on the conclusion and execution of insurance and reinsurance contracts".	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Board of Directors of JSC "Export Credit Agency of Kazakhstan" dated June 24, 2026 (Minutes No. 11), Amendments and Additions No. 1 were made to the Reinsurance Policy of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Board of Directors of the Joint-Stock Company "Export Credit Agency of Kazakhstan" dated June 27, 2024 (Minutes No. 11).
5.	Ensure the updating of concepts and definitions set out in paragraph 2 of the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", in accordance with the Order of the Minister of Trade and Integration of the Republic of Kazakhstan dated March 29, 2024 No. 158-NK "On approval of conditions for conducting certain types of activities of the Export Credit Agency of Kazakhstan" and the internal documents of the Company.	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated February 26, 2026 (Minutes No. 13), Amendments and Additions No. 1 were made to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated September 17, 2025 (Minutes No. 85).

6.	Ensure the updating of Chapter 3 of the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", taking into account the regulation of the Department's actions from the moment of receiving an extract from the decision of the collegial body until the moment of receiving confirmation from the reinsured party of readiness to sign the General Reinsurance Agreement and/or accept the volume of risks under the Insurance Contract.	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated February 26, 2026 (Minutes No. 13), Amendments and Additions No. 1 were made to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated September 17, 2025 (Minutes No. 85).
7.	Ensure the updating of paragraph 31 and paragraph 49 of the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", taking into account the identified inconsistencies.	Decision of the authorized body of the Company on introducing amendments and (or) additions to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan".	By decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated February 26, 2026 (Minutes No. 13), Amendments and Additions No. 1 were made to the Regulations on Inward Reinsurance of the Joint-Stock Company "Export Credit Agency of Kazakhstan", approved by decision of the Management Board of JSC "Export Credit Agency of Kazakhstan" dated September 17, 2025 (Minutes No. 85).
8.	Inclusion of anti-corruption clauses in the terms of concluded reinsurance agreements.	1) Internal memorandum from the Reinsurance Department to the Compliance Service on coordinating the text of the anti-corruption clause; 2) Internal memorandum from the Compliance Service on coordinating the text of the anti-corruption clause.	1) Internal memorandum from the Reinsurance Department No. 96-VN dated January 20, 2026. 2) Internal memorandum from the Compliance Service No. 454-VN dated February 2, 2026.