ANALYTICAL REPORT
on the results of the internal analysis of corruption risks
at JSC «Fund of Problem Loans» as of June 15, 2026

Introduction: Order № 86 dated May 21, 2026, «On Conducting an Internal Analysis of Corruption Risks» from June 15, 2026, to July 27, 2026.
Composition of the Working Group for the internal analysis of corruption risks at JSC «Fund of Problem Loans»:

Head of the working group:
Deputy Chairman of the Management Board - Chief of Staff – Tumenbayev M.Zh.
Secretary of the Working Group:
Chief Specialist of the Compliance Service – Bazilov K.N.

Descriptive part:

1. Управление персоналом
In the NLAs and Ids of the Fund regulating human resources management, no corruption risks have been identified, in view of this, a description of the corruption risk and recommendations for its elimination are absent. At the same time, the occurrence of corruption risks arising from other issues, organizational and managerial activities (the human factor) is not excluded. The list of positions exposed to corruption risks is attached.

2. Resolution of conflicts of interest
There are no conflicts of interest in the activities of the Fund, including in terms of corruption risks, and therefore there is no description of the corruption risk and no recommendations for its elimination.
3. Provision of public services
The Fund does not provide public services.

4. Implementation of permitting functions
The Fund does not have the authority to perform licensing functions.

5. Implementation of control functions
The Fund does not have the authority to perform control functions.

6. Utilization and distribution of budgetary and financial resources
The Foundation is an independently operating entity and does not have the authority to distribute state budgetary and financial funds. When approving its own budget and allocating financial resources, individual decisions are not made; there are collegial

governing bodies – the Board of Directors, and the executive body – the Management Board of the Fund.

7. Conclusion of contracts with individuals and legal entities

In the provisions of the NLAs and IDs of the Fund regulating the conclusion of transactions, no corruption risks have been identified, in view of this, a description of the corruption risk and recommendations for its elimination are absent.

8. Development and operation of information systems

In the NLAs and IDs of the Fund, no provisions regulating the conclusion of transactions for the acquisition and operation of information systems have been identified.

9. Other issues arising from organizational and management activities

As a result of the analysis of individual issues arising from the organizational and management activities of the Fund, possible corruption risks for the Fund may include:

1) abuse of official authority;
2) conflict of interest when concluding contracts;
3) receiving and/or giving improper remuneration (bribery);

There are no cases of such corruption risks occurring in the Fund. The probability of such a risk occurring is low.

In order to prevent the occurrence of these corruption risks, it is necessary to:

- division of duties between employees with specification of their powers in the job description;
- timely elimination of conflicts of interest;
- ensure the existence of agreements on full financial liability and timely reporting.

Chairman of the Management Board **Abdullayev K.N.**