

Appendix 1
to the Model Rules for Conducting
Internal Analysis of Corruption
Risks

**List of positions subject to corruption risks,
determined based on the results of internal analysis of corruption risks.
«Fund of Problem Loans» JSC as of June 15, 2026.**

Position subject to corruption risk	Official powers containing corruption risks	Corruption risks	Corruption Risk Level
Chairman, Deputy Chairmen of the Board	Having the right to make decisions and carry out organizational and economic functions	Abuse of official powers. Allowing a conflict of interest, receiving illegal remuneration.	Low
Chief Accountant - Director of the Department of Financial, Tax Accounting and Reporting.	Having the right to make decisions and carry out organizational and economic functions (including when performing these functions by power of attorney)	Abuse of official powers. Allowing a conflict of interest, receiving illegal remuneration.	Low
Director of the Department	Having the right to make decisions and carry out organizational and economic functions (including when performing these functions by power of attorney)	Abuse of official powers. Allowing a conflict of interest, receiving illegal remuneration.	Low
Head of the Department	Having the right to make decisions and carry out organizational and economic functions (including when performing these functions by power of attorney)	Abuse of official powers. Allowing a conflict of interest, receiving illegal remuneration.	Low
Chief Specialist, other persons.	Having the right to make decisions and carry out	Abuse of official powers.	Low

	organizational and economic functions by power of attorney (special powers)	Allowing a conflict of interest, receiving illegal remuneration.	
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**Note: A person performing management functions in a state organization or quasi-state sector entity is a person who performs organizational-disciplinary or administrative-economic functions in said organizations permanently, temporarily, or by special authority;*