

ANALYTICAL REPORT
on the results of internal analysis of corruption risks
of the «Fund of Problem Loans» as of 16.12.2023

(In accordance with the paragraph 25 of Chapter 3 of the Standard Rules for Conducting Internal Analysis of Corruption Risks, approved by the 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)

The results of the internal analysis of corruption risks carried out in accordance with Order No. 169 of November 10, 2023 “On conducting an internal analysis of corruption risks” from December 16, 2023 to January 30, 2024, established that:

1. Human Resources Management

No corruption risks have been identified in the Normative Legal Acts and Internal Regulations on the Human Resources Management of the Fund; therefore, there is no description of the corruption risk or recommendations for its elimination.

2. Resolution of Conflict of Interest

There is no conflict of interest in the Fund’s activities, including in terms of corruption risks, and therefore there is no description of the corruption risk and recommendations for its elimination.

3. Public Service Delivery

The Fund does not provide public services.

4. Implementation of Authorization Functions

The Fund does not have the power to implement the authorization functions.

5. Implementation of Control Function

The Fund does not have the authority to exercise control functions.

6. Development and Distribution of Budgetary and Financial Funds;

The Fund is an independently operating entity and does not have the authority to distribute the state budgetary and financial funds. When approving its own budget and distributing financial resources, individual decisions are not made; there are collegial governing bodies - the Board of Directors, and an executive body - the Management Board of the Fund.

7. Conclusion of Agreements with Individuals and Legal Entities;

No corruption risks have been identified in the Normative Legal Acts and Internal Regulations on the agreements conclusion of the Fund; therefore, there is no description of the corruption risk or recommendations for its elimination

8. Development and Operation of Information Systems;

No corruption risks have been identified in the Normative Legal Acts and Internal Regulations on conclusion of the agreements on purchase and operation of information systems of the Fund.

9. Other Issues arising from Organizational and Managerial Activities

The results of the analysis has established that a possible corruption risk for the Fund, as an economic entity, is damage to the interests of the Fund due to misconduct of official powers by Fund employees, misappropriation (theft) of material assets.

There are no cases of such corruption risks occurring in the Fund.

The likelihood of such a risk occurring is low.

In order to exclude the occurrence of a real corruption risk, it is necessary to:

- constantly monitor conflicts of interest with their timely elimination.*
- constantly monitor the availability of agreements on full financial responsibility and timely reporting of employees.*

«Fund of Problem Loans» JSC