

INFORMATION

on the conducted measures for the prevention of corruption and the results of compliance risk monitoring in JSC «Problem Loans Fund» for 2025

In execution of the requirements of the Law of the Republic of Kazakhstan «On Combating Corruption», JSC «Problem Loans Fund» (hereinafter referred to as the Fund) took appropriate anti-corruption measures during the reporting period.

Formation of an anti-corruption culture

Anti-corruption work in the Fund during the reporting period was carried out on an ongoing basis, according to the Work Plan of the Compliance Service (hereinafter referred to as the CS) for 2025 (hereinafter referred to as the CS Plan) approved on January 24, 2025 by the Board of Directors of the Fund (hereinafter referred to as the BDF).

In accordance with the Audit Program and based on the results of the interim Audit of the Anti-Bribery Management System in the fourth quarter of the current year, training seminars were held to study ISO 37001:2016 «Anti-Bribery Management System» with the employees of the Debt Recovery Department, the Redeemed Assets Accounting and Credit Administration Department, and the Asset Management Department.

In total, 6 sessions were conducted by the CS during the year.

Individual interviews were conducted with the Fund's employees, familiarizing them with the anti-corruption legislation and the Fund's Policy.

In order to implement the Anti-Corruption Policy Concept for 2022-2026, approved by the Decree of the President of the Republic of Kazakhstan № 802 dated February 02, 2022, a «Corruption Cartogram» page was created on the website of JSC «Problem Loans Fund».

The specified page reflects information in the following areas:

- register of positions exposed to corruption risks;
- list of corruption risks;
- map of corruption risks;
- analytical note.

Anti-corruption monitoring

Monitoring of ensuring compliance by the Fund and its employees with the Law of the Republic of Kazakhstan «On Combating Corruption» and the effectiveness of the Fund's anti-corruption policy was carried out on an ongoing basis. There were no facts of the occurrence of corruption risks during the reporting period.

In order to ensure the transparency of activities, publications on the Fund's website and on other specialized electronic platforms regarding the Fund's property being sold, as well as other publications concerning activities, were constantly monitored and analyzed.

This work is carried out by the authorized structural divisions of the Fund on an ongoing basis.

The work on analyzing appeals from individuals and legal entities (applications, complaints) addressed to the Fund for the presence of signs of corruption (compliance) risks was carried out constantly, according to the approved Work Plan.

During the analysis of appeals, no facts of violation of the Law of the Republic of Kazakhstan «On Combating Corruption» were established. At the same time, the specified appeals did not report any corruption facts on the part of the Fund's employees.

In the period from July 14 to 15, 2025, an interim audit/certification of the Fund's anti-bribery management system (hereinafter referred to as ABMS) was conducted in the Fund by the Branch of LLC «CERT INTERNATIONAL» in the Republic of Kazakhstan for compliance with the international standard ISO 37001:2016.

The audit confirmed the compliance of the Fund's management with the Standard. Potentials for improving the Fund's management on combating corruption were identified.

In order to improve the management system, adjustments were made to the assessment of the ABMS of the structural divisions of the Fund. Based on the foregoing, in addition to the planned audit of the management system in the Asset Management Department, ABMS audits were conducted in all structural divisions of the Fund.

During the audits, potentials for improving management in the structural divisions were identified. Corresponding proposals were submitted.

In the 4th quarter of 2025, the Compliance Service trained one internal ABMS auditor from among the Fund's employees.

Based on the joint order of the Department of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) for Almaty city and JSC «Problem Loans Fund» № 42 dated 18.02.2025 «On conducting an external analysis of corruption risks in the activities of JSC «Problem Loans Fund», an external analysis of corruption risks was conducted in the Fund.

During the reporting period, there were no corruption cases for which the Fund's employees were brought to criminal responsibility, disciplinary responsibility, or dismissals of employees.

Compliance Service