

Approved
 by the Decision of the Board of Directors
 of JSC «Problem Loans Fund»
 dated «20» February 2026
 minutes № 1
 appendix № 7 to the minutes

**Work Plan of the Compliance Service of JSC «Problem Loans Fund»
 on combating corruption for 2026**

in accordance with clause 6 of the international standard of the anti-corruption system ISO 37001:2016

№	Planned activities	Сроки исполнения	Responsible executors	Form of completion
Main measures for the prevention and prophylaxis of corruption, regulatory (compliance) risks				
1	Monitoring the effectiveness of the anti-corruption policy, compliance with legislation on combating corruption	ongoing	Compliance Service jointly with the structural divisions of the Fund	Reference-recommendation as necessary
2	Recording of events related to corruption (regulatory) risk	ongoing	Compliance Service jointly with the structural divisions of the Fund	Logbook recording
3	Identification of conflicts of interest in the Fund's activities, making recommendations for elimination if identified	ongoing	Compliance Service, Human Resources Management and Document Workflow Department	Reference-recommendation upon identification
4	Analysis of appeals from individuals and legal entities (applications, complaints) addressed to the Fund for the presence of signs of corruption (compliance) risks	ongoing	Compliance Service, Human Resources Management and Document Workflow Department	Submission of recommendations, participation in inspections in the presence of signs of corruption (compliance) risks in the appealed actions

5	Reliability check (due diligence) of counterparties	ongoing	Compliance Service and structural divisions of the Fund	Conclusions, recommendations
6	Analysis of ensuring the transparency of the Fund's activities in the mass media and the representation of the Fund's property being sold on the website and on other specialized electronic platforms	ongoing	Compliance Service jointly with the structural divisions of the Fund	Informing the Board of Directors of the Fund upon quarterly and annual submission of the Information report
7	Conducting seminars/training with compliance coordinators of structural divisions, employees of the Fund in order to form an anti-corruption culture	quarterly	Compliance Service, invited lecturers as necessary	Seminars, discussions, lectures
Planned activities by quarter				
1st quarter of 2026				
1	Report on the anti-corruption measures conducted and informing the Board of Directors on the results of compliance risk monitoring	January 2026	Compliance Service	Information
2	Audit of the Anti-Bribery Management System (ABMS) of the Corporate Development and Activity Coordination Department	January 2026	Compliance Service	ABMS audit report
3	Audit of the Anti-Bribery Management System (ABMS) of the Financial, Tax Accounting and Reporting Department	February 2026	Compliance Service	ABMS audit report
4	Audit of the Anti-Bribery Management System (ABMS) of the Risk Management Department	March 2026	Compliance Service	ABMS audit report

5	Preparation of a report to the Board of Directors as of 31.03.2026 on inventory issues: - availability of pledged property for projects with detailed information on location, liquidity, presence of encumbrance, etc. - existence of enforcement proceedings under court decisions - on the completeness of the measures taken to search for collateral, undertaken by Private Bailiffs (PBs).	1st meeting of the Board of Directors after the end of the 1st quarter of 2026	Compliance Service	Report for members of the Board of Directors
2nd quarter of 2026				
1	Report on the anti-corruption measures conducted and informing the Board of Directors on the results of compliance risk monitoring for the 1st quarter of 2026	April 2026	Compliance Service	Information report
2	Audit of the Anti-Bribery Management System (ABMS) of the Asset Management Department	April 2026	Compliance Service	ABMS audit report
3	Audit of the Anti-Bribery Management System (ABMS) of the Legal Department	May2026	Compliance Service	ABMS audit report
4	Audit of the Anti-Bribery Management System (ABMS) of the Redeemed Assets Accounting and Credit Administration Department	June 2026	Compliance Service	ABMS audit report
5	Preparation of a report to the Board of Directors as of 30.06.2026 on inventory issues: - availability of pledged property for projects with detailed information on location, liquidity, presence of encumbrance, etc.	1st meeting of the Board of Directors after the end of the	Compliance Service	Report for members of the Board of Directors

	- existence of enforcement proceedings under court decisions - on the completeness of the measures taken to search for collateral, undertaken by Private Bailiffs (PBs).	2nd quarter of 2026		
3rd quarter of 2026				
1	Report on the anti-corruption measures conducted and informing the Board of Directors on the results of compliance risk monitoring for the 2nd quarter of 2026	July 2026	Compliance Service	Information report
2	Audit of the Anti-Bribery Management System (ABMS) of the Department for Work with Rights of Claim and State Guarantees	July 2026	Compliance Service	ABMS audit report
3	Audit of the Anti-Bribery Management System (ABMS) of the Information Technology and Security Department	August 2026	Compliance Service	ABMS audit report
4	Audit of the Anti-Bribery Management System (ABMS) of the Debt Recovery Department	September 2026	Compliance Service	ABMS audit report
5	Organization and conduct of an internal analysis of the Fund's corruption risks	August-September 2026	Compliance Service jointly with the structural divisions of the Fund	Summary analytical note
6	Second surveillance audit of the Fund's Management System for compliance with the requirements of the international standard ISO 37001:2016	September 2026	International Body «CERT International», Compliance Service	ABMS audit report

7	Preparation of a report to the Board of Directors as of 30.09.2026 on inventory issues: - availability of pledged property for projects with detailed information on location, liquidity, presence of encumbrance, etc. - existence of enforcement proceedings under court decisions - on the completeness of the measures taken to search for collateral, undertaken by Private Bailiffs (PBs).	1st meeting of the Board of Directors after the end of the 3rd quarter of 2026	Compliance Service	Report for members of the Board of Directors
4th quarter of 2026				
1	Report on the anti-corruption measures conducted and informing the Board of Directors on the results of compliance risk monitoring for the 3rd quarter of 2026	October 2026	Compliance Service	Information report
2	Audit of the Anti-Bribery Management System (ABMS) of the Internal Administration Department	October 2026	Compliance Service	ABMS audit report
3	Audit of the Anti-Bribery Management System (ABMS) of the Human Resources Management and Document Workflow Department	November 2026	Compliance Service	ABMS audit report
4	Audit of the Anti-Bribery Management System (ABMS) of the Budget Planning Department	December 2026	Compliance Service	ABMS audit report
5	Audit of the Anti-Bribery Management System (ABMS) of the Compliance Service	December 2026	ABMS Internal Audit Group	ABMS audit report

6	Preparation of the Report on the anti-corruption measures conducted and on the results of compliance monitoring for 2026 and submission for approval of the draft Work Plan of the Compliance Service for 2027	December 2026	Compliance Service	Draft Information report, draft Plan
7	Preparation of a report to the Board of Directors as of 31.12.2026 on inventory issues: - availability of pledged property for projects with detailed information on location, liquidity, presence of encumbrance, etc. - existence of enforcement proceedings under court decisions - on the completeness of the measures taken to search for collateral, undertaken by Private Bailiffs (PBs).	1st meeting of the Board of Directors after the end of the 4th quarter of 2026	Compliance Service	Report for members of the Board of Directors

Head of the Compliance Service

M. Nurlaev