

Approved by the decision
of the Board of Directors
of JSC 'Problem Loan Fund'
dated "24" January 2025,
Minutes No. 1, Appendix
No. 2 to the Minutes.

Work Plan of the Compliance Service

JSC "Problem Loan Fund" on Anti-Corruption for 2025

In accordance with paragraph 6 of the international standard of the anti-corruption system ISO 37001

№	Planned Activities	Deadlines	Responsible Executors	Form of Completion
Main Activities for the Prevention and Mitigation of Corruption and Regulatory (Compliance) Risks				
1	Monitoring the effectiveness of the anti-corruption policy, compliance with anti-corruption legislation	Ongoing	Compliance Service jointly with structural divisions of the Fund	Report-recommendation as needed
2	Recording events related to corruption (regulatory) risk	Ongoing	Compliance Service jointly with structural divisions of the Fund	Journal records
3	Identifying conflicts of interest in the activities of the Fund, making recommendations for elimination if detected	Ongoing	Compliance Service, HR and Document Management Department	Report-recommendation as detected

4	Analysis of appeals from individuals and legal entities to the Fund for signs of corruption (compliance) risks	Ongoing	Compliance Service, HR and Document Management Department	Submission of recommendations, participation in inspections in the presence of signs of corruption (compliance) risks in the contested actions.
5	Reliability checks of counterparties	Ongoing	Compliance Service and structural divisions of the Fund	Conclusions, recommendations
6	Analysis of the transparency of the Fund's activities in media and on specialized electronic platforms	Ongoing	Compliance Service jointly with structural divisions of the Fund	Informing the Board of Directors of the Fund during the quarterly and annual submission of the information report
7	Conducting seminars/training with compliance coordinators and Fund employees	Quarterly	Compliance Service, invited lecturers if necessary	Seminars, discussions, lectures

Quarterly Planned Activities

1st Quarter of 2025

1	Report on the conducted anti-corruption activities and informing the Board of Directors on the results of compliance risk monitoring	January 2025	Compliance Service	Information
2	Organization and implementation of internal analysis of the Fund's corruption risks	January–March 2025	Compliance Service jointly with structural divisions of the Fund	Summary analytical report
2st Quarter of 2025				
3	Report on the conducted anti-corruption activities and informing the Board of Directors on the results of compliance risk monitoring for the 1st quarter of 2025	April 2025	Compliance Service	Report-information
4	Audit of the Anti-Corruption Management System (ACMS) of the Human Resources Department in accordance with ISO 37001	May–June 2025	Compliance Service	ACMS audit report
3rd quarter of 2025				
5	Report on the conducted anti-corruption activities and informing the Board of Directors on the results of	July 2025	Compliance Service	Report-information

	compliance risk monitoring for the 2nd quarter of 2025			
6	Audit of the Anti-Corruption Management System (ACMS) of the Asset Management Department in accordance with ISO 37001	July– August 2025	Compliance Service	ACMS audit report
7	First surveillance audit of the Fund’s Management System for compliance with the requirements of the international standard ISO 37001:2016	September 2025	International Body “CERT International”, Compliance Service	ACMS audit report
4th quarter of 2025				
8	Report on the conducted anti-corruption activities and informing the Board of Directors on the results of compliance risk monitoring for the 3rd quarter of 2025	October 2025	Compliance Service	Report-information
9	Audit of the Anti-Corruption Management System (ACMS) of the Procurement Department of DVA in accordance with ISO 37001	October - December 2025	Compliance Service	ACMS audit report

10	Preparation of the Report on the conducted anti-corruption activities and on the results of compliance monitoring for 2025, and submission of the draft Compliance Service Work Plan for 2026 for approval	December 2025	Compliance Service	Draft information report, draft plan
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Head of the Compliance Service

M. Nurlayev

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