

## **INFORMATION**

### **On the results of anti-corruption efforts and compliance risk monitoring in JSC “Problem Loan Fund” for 2024**

In accordance with the requirements of the Law of the Republic of Kazakhstan “On Combating Corruption,” JSC “Problem Loan Fund” (hereinafter referred to as the Fund) has implemented appropriate anti-corruption measures during the reporting period, fulfilling additional tasks assigned by the Fund’s Board of Directors to the Compliance Service.

#### **Formation of Anti-Corruption Culture**

During the reporting period, significant efforts were made to foster an anti-corruption culture among the Fund’s employees. As per the approved work plan, both training seminars and individual discussions were conducted to familiarize employees with the Fund’s Policy and the anti-corruption legislation of the Republic of Kazakhstan.

In accordance with Presidential Decree No. 802 dated February 2, 2022, “On the Approval of the Anti-Corruption Policy Concept of the Republic of Kazakhstan for 2022-2026 and Amendments to Certain Presidential Decrees of the Republic of Kazakhstan,” a certification audit was conducted within the Fund. The audit confirmed the Fund’s compliance with the International Standard ISO 37001:2016 Anti-Bribery Management System.

As per Contract No. 106 dated July 15, 2024, signed with the Kazakhstan branch of LLC “CERT International” for the certification of the Management System for a three-year period, an interim audit is planned for 2025-2026. This audit will allow for real-time adjustments to the Fund’s anti-corruption measures.

On September 28, 2024, the certification body “CERT INTERNATIONAL s.r.o.” confirmed, based on audit results, that the Fund’s Anti-Bribery Management System complies with the ISO 37001:2016 standard, issuing Certificate No. ABMS-1628/A.

Certification details have been published on the International Accreditation Forum (IAF) website at **[iafcertsearch.org](https://iafcertsearch.org)**.

On October 10, 2024, JSC “Problem Loan Fund” was registered in the data registry of the State Technical Regulation System of the Republic of Kazakhstan, receiving Compliance Certificate No. KZ.Q.01.0064.C24.08888. This confirms that the Fund’s Anti-Bribery Management System complies with Standard ST RK ISO 37001-2017 (ISO 37001:2016).

## Anti-Corruption Monitoring

Anti-corruption monitoring of employees' (officials') compliance with the anti-corruption legislation of the Republic of Kazakhstan was conducted on a continuous basis throughout the reporting period. No corruption risks were identified during this period.

No complaints (requests) regarding the actions (or inaction) of employees of JSC "Problem Loan Fund" were received.

To ensure transparency, and in accordance with the Board of Directors' recommendations, asset tracking and analysis are conducted on the Fund's website and other relevant electronic platforms. The Fund's authorized structural units carry out this work regularly.

According to the 2024 Compliance Service Work Plan, the following areas were reviewed:

- **Handling of applications and complaints:** Between January 1, 2022, and May 23, 2024, the Fund received 824 applications via the E-ötinim system. None of the submissions were complaints regarding the actions or inactions of the Fund's employees or officials, including corruption-related complaints.
- **Effectiveness of anti-corruption measures in the Debt Recovery Department (DRD):** An internal audit of the Anti-Bribery Management System (ABMS) was conducted in accordance with ST RK ISO 19011-2019 (Management Systems Auditing Standard). Following the audit, it was recommended to amend DRD employees' job descriptions to include responsibilities for corruption-related offenses.
- **Procurement practices and compliance risk assessment:** The procurement of services, works, and goods within the Fund is carried out in compliance with the Law of the Republic of Kazakhstan "On Public Procurement," as well as internal regulations, including the "Regulations on the Organization and Conduct of Public Procurement at JSC 'Problem Loan Fund'" and the "Rules for the Procurement of Goods, Works, and Services by JSC 'Problem Loan Fund'" (hereinafter referred to as the Rules).

No complaints or regulatory orders regarding procurement issues were received. There were no legal disputes concerning the Fund's compliance with established procurement procedures. From 2022-2023, no procurement contracts remained unfulfilled.

During the reporting period, no employees of the Fund were subjected to criminal or disciplinary liability. Additionally, no employees were dismissed for negative reasons.