

**Information on recommendations
following internal analysis on corruption risks in
activities of E-Finance Center JSC**

Object of corruption risks internal analysis: E-Finance Center JSC (hereinafter - the Company).

Duration of the internal corruption risk analysis: April 3 to May 12, 2023.

Date of signing of the policy brief: 12 May 2023.

Item No.	Recommendation	Completion forms according to the action plan	Information on recommendations
1.	Updating/approval of the Company's internal regulatory documents concerning further development of the existing anti-corruption management system of the Company.	Internal regulatory documents approved by the decision of the Company's Management Board/Board of Directors	Executed Internal regulatory documents on the Company's anti-corruption management system have been approved: - By the decision of the Company's Management Board dated March 30, 2023 (Minutes No. 9); - by the decision of the Board of Directors of the Company dated 17 April 2023 (Minutes No. 6).
2	Consider performing due diligence on certain employees (during recruitment, career progression), interaction between counterparties/business partners of the Company via due diligence tools.	Contract for public procurement of services on providing access to the security check service	Executed Contract on Public Procurement of Services dated June 21, 2023 No.161
3	Updating of the Rules of Recruitment and Adaptation of Employees of EFC JSC concerning the inclusion of the profile testing procedure, etc.	Approved by the decision of the Management Board of the Company Rules of Recruitment and Adaptation of Employees of EFC JSC or changes/additions to them	Executed Changes and additions to the Rules of Recruitment and Adaptation of Employees of EFC JSC were approved by the decision of the Management Board of the Company dated December 01, 2023 (Minutes No. 30).
4	Define list of products, works and services subject for control and monitoring, commission acceptance and check.	Instruction on organization of public procurement of goods, works and services of the Company or changes/additions approved by	Executed The instruction on the organization of public procurement of goods, works and services of EFC JSC was approved by the decision of the Management Board of the Company dated December 27, 2023 (Minutes No. 34).

		the decision of the Management Board of the Company.	
5	Updating of the Rules for Preparation, Execution, Performance of Contracts and Management of Legal Support Processes for the Activities of EFC JSC.	Rules for Preparation, Execution, Performance of Contracts and Management of Legal Support Processes for the Activities of EFC JSC or amendments/additions thereto approved by the decision of the Company's Management Board	Executed Rules for Preparation, Execution, Performance of Contracts and Management of Legal Support Processes of EFC JSC have been approved in a new edition by the decision of the Management Board of the Company dated 31 July 2023 (Minutes No. 24).
6	Implementation of the international standard ISO 37001:2016 in the Company, and relevant confirmation (certification).	Implementation and certification documents	Executed The Company's certificate of compliance with the international standard ISO 37001:2016 was received on November 27, 2023.
7	Informing business partners about the anti-corruption management system implementation and necessity to comply with the requirements of the anti-corruption laws of the Republic of Kazakhstan.	Official letters and/or website announcements	Executed Outgoing letter No. 03-1/3284 dated April 18, 2023. On 10 May 2023, an announcement was published on the Company's corporate website in "News" section on the topic: Anti-corruption policy of the activities EFC JSC.
8	Adopt necessary measures to approve the updated Methodology for calculating the Company's cost of services.	Calculation method of cost of Company's services approved by the decision of the Board of Directors	Executed Outgoing letters No. 03-3/586 dated January 20, 2023, No. 03-3/2864 dated April 5, 2023, No. 03-1/7852 dated October 18, 2023. Minutes of the meeting with employees of the Ministry of Finance of the Republic of Kazakhstan on the issue of approving the project "Enlarged time standards for qualified support of EFC JSC" in the field of information technology of informatization facilities dated November 13, 2023.