

Report on Anti-Corruption activities conducted at the "E-Finance Center" Joint-Stock Company for 2024

In 2024, the "E-Finance Center" Joint-Stock Company (hereinafter referred to as the Company) carried out the following anti-corruption activities:

- in accordance with the order of the Acting Chairman of the Management Board of the Company dated January 29, 2024 No. 27 "On Conducting an internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company, the working group conducted an internal analysis of corruption risks in the Company's activities for 2023;

- on February 7, 2024, the Report on Anti-Corruption activities conducted at the "E-Finance Center" Joint-Stock Company was published on the Company's corporate website;

- on February 22, 2024, an Analytical Report on the results of an internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company was published on the Company's corporate website;

- by the order of the Chairman of the Board of the Company dated February 23, 2024, No. 41, an Action Plan for Eliminating the Causes and Conditions Contributing to Corruption Offenses, identified as a result of the internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company, was approved. The plan was published on the Company's corporate website on February 26, 2024;

- by the order of the Chairman of the Board of the Company dated February 27, 2024, No. 46, the Analysis of Internal and External Factors of the Anti-Corruption Management System of the "E-Finance Center" Joint-Stock Company was approved;

- by the decision of the Board of the Company dated March 1, 2024 (Minutes No. 8), the Register of Corruption Risks of the "E-Finance Center" Joint-Stock Company for 2024 and the Anti-Corruption Management System Objectives of the "E-Finance Center" Joint-Stock Company for 2024 were approved;

- in April 2024, a video course on anti-corruption issues was recorded;

- in accordance with the order of the Acting Chairman of the Board of the Company dated May 24, 2024, No. 96 "On the Establishment of a Group of Internal Auditors for the Anti-Corruption Management System of "E-Finance Center" Joint-Stock Company for 2024", an internal audit of the anti-corruption management system in the Company was organized and conducted;

- an analysis of the anti-corruption management system was conducted by the Board of the Company (Minutes dated June 6, 2024);

- by the decision of the Board of the Company dated June 18, 2024 (Minutes No. 21), the Report on the Internal Audit of the Anti-Corruption Management System at the "E-Finance Center" Joint-Stock Company was approved;

- anti-corruption memorandums were developed and displayed on the lock screens of the employees' workstations on June 27, 2024;

- by the order of the Chairman of the Board of the Company dated July 19, 2024, No. 128, the Plan for Implementing Corrective Actions Based on the Results of the Internal Audit of the Anti-Corruption Management System at the "E-Finance Center" Joint-Stock Company for 2024 was approved;

- Information on the implementation of the recommendations made following the internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company for the first half of 2024 was posted on the Company's corporate website;

- an analysis of the anti-corruption management system was conducted by the Board of Directors of the Company (Minutes No. 11 dated September 30, 2024);

- in November 2024, activities were carried out to confirm the Company's compliance with the anti-corruption management system requirements of the international standard ISO 37001:2016. Following the surveillance audit conducted by the international certification body CERT International on November 28, 2024, the Company received the Compliance Certificate;

- quarterly/monthly the reporting established by the Sole Shareholder of the Company was provided as part of the implementation of the standard basic direction No. 4 "Prevention and Combating Corruption" for 2024;

- quarterly/monthly monitoring was conducted to ensure the implementation of the Action Plan for Eliminating the Causes and Conditions Contributing to Corruption Offenses, identified as a result of the internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company, the Plan for Implementing Corrective Actions Based on the Results of the Internal Audit of the Anti-Corruption Management System at the "E-Finance Center" Joint-Stock Company, activities outlined in the Register of Corruption Risks of the "E-Finance Center" Joint-Stock Company for 2023, and the achievement of the Anti-Corruption Management System Objectives for 2023, as well as the Plan for Implementing Corrective Actions Based on the Results of the Internal Audit of the Anti-Corruption Management System at the "E-Finance Center" Joint-Stock Company for 2024, activities outlined in the Register of Corruption Risks of the "E-Finance Center" Joint-Stock Company for 2024, and the achievement of the Anti-Corruption Management System Objectives for 2024;

- regular interaction and provision of information in response to requests from the authorized body of the Republic of Kazakhstan on anti-corruption matters were carried out throughout 2024;

- for the purpose of conducting informational and explanatory activities:

- three informational messages for the employees of the Company were published on the internal corporate portal Bitrix24;

- as part of the adaptation activities for newly hired employees of the Company, the compliance manager conducted two introductory training sessions on the Anti-Corruption Policy of the "E-Finance Center" Joint-Stock Company, approved by the decision of the Company's Board of Directors on April 17, 2023 (Minutes No. 6);

- on May 24, 2024, a training seminar on the topic "Anti-Corruption Policy" was held, with the involvement of an officer from the Prevention Service of the Anti-Corruption Agency of the Republic of Kazakhstan. Following the seminar, relevant information was posted in the "News" section of the Company's corporate website (ecc.kz/ru/post/seminar-anti-corruption-policy);

- from September 23 to 25, 2024, the Compliance Service, in collaboration with the Company's Information Security Department, conducted training on compliance

with the anti-corruption legislation of the Republic of Kazakhstan, as well as on the protection of personal and confidential data and ensuring their security;

- for the purpose of analysis and further improvement of effectiveness, the Company's Compliance Service conducted testing of the Company's employees on compliance with the anti-corruption legislation of the Republic of Kazakhstan, as well as on issues related to personal and confidential data and ensuring their protection;

- to assess the degree of improvement in understanding of anti-corruption compliance culture, the Company's Compliance Service conducted 2 surveys among the Company's employees. Based on the results, areas for further improvement were identified, and corresponding actions were developed.

Throughout 2024, the compliance manager/Compliance Service of the Company regularly carried out activities to ensure compliance with regulatory requirements, the application of international anti-corruption practices, adherence to the fundamental principles of anti-corruption, and the effective implementation of anti-corruption measures in accordance with the Anti-Corruption Law of the Republic of Kazakhstan. Additionally, efforts were made to ensure the functioning of the Company's anti-corruption management system.

Compliance Manager



Sh. Turash