## The list of positions exposed to corruption risks identified based on the results of an internal analysis of corruption risks in the activities of the "E-Finance Center" Joint-Stock Company

Name of the object of internal analysis of corruption risks: "E-Finance Center" Joint-Stock company (hereinafter – the Company).

A position at risk of corruption	Official responsibilities containing elements of corruption Risk / /Corruption risks	The level of corruption risks
Officiary (Board of Directors, Management Board)	General management of the Company's activities, as well as management of the Company's day-to-day operations in accordance with the competencies established by the Law of the Republic of Kazakhstan "On Joint-Stock Companies", the Company's Charter and other internal regulatory documents of the Company.	High
Deputy Chairman of the Management Board - Technical Director	Control and management of the activities of the Department of Project Administration and Budget Execution, Department of Technical Administration of the Company. Interaction with members of the Management Board and managing directors within the supervised areas of the Company's activities. Making proposals to the Chairman of the Management Board on personnel issues, as well as on business trips, incentives, and disciplinary penalties for employees of the Company's supervised structural divisions. Coordination and control of the execution of a set of measures for the "Treasury-Client" IS, the integrated Treasury information system. Participation in public procurement procedures for goods, works, and services, as well as in the work of competitive commissions to carry out public procurement procedures. Signing of income, expenditure and other contracts on behalf of the Company, within the scope of its competence. Control and acceptance of delivered goods, completed works and rendered services under concluded revenue, expenditure and other contracts of the Company within the scope of its competence. Ensuring timely signing of acts of acceptance and transfer of goods/completed works/services rendered in accordance with the Company's revenue, expenditure and other agreements within its competence. Organization of work with the Company's partners, within the scope of their competence. Working with documents marked "For official use only", "Confidential". Representing the interests of the Company on supervised issues in relations with third parties. Other powers defined by the administrative documents of the Chairman of the Management Board and other internal regulatory documents of the Company.	High
Managing Directors	Control and management of the activities of structural divisions in accordance with the order of the Chairman of the Management Board of the Company "On the distribution of duties, as well as the scope of authority and responsibility between members of the Management Board and other managers of the "E-Finance Center" joint-stock company. Interaction with members	High

of the Management Board, Deputy Chairman of the Management Board - Technical Director and Managing Directors within the supervised areas of the Company's activities. Making proposals to the Chairman of the Management Board on personnel issues, as well as on business trips, incentives, and disciplinary penalties for employees supervised by the Company's structural divisions. Coordination and control of the implementation of a set of measures for supervised information systems. Participation in public procurement procedures for goods, works, and services, as well as in the work of competitive commissions to carry out public procurement procedures. Signing of income, expenditure and other contracts on behalf of the Company, within the scope of its competence. Control and acceptance of delivered goods, completed works and rendered services under concluded revenue, expenditure and other contracts of the Company within the scope of its competence. Ensuring timely signing of acts of acceptance and transfer of goods/completed works/services rendered in accordance with the Company's revenue, expenditure and other agreements within its competence. Organization of work with the Company's partners, within the scope of their competence. Working with documents marked "For official use only", "Confidential". Representing the interests of the Company on supervised issues in relations with third parties. Other powers defined by the administrative documents of the Chairman of the Management Board and other internal regulatory documents of the Company. Control and management of the activities of structural divisions in accordance with the order

Chief of Staff

of the Chairman of the Management Board of the Company "On the distribution of duties, as well as the scope of authority and responsibility between members of the Management Board and other managers of the "E-Finance Center" joint-stock company. Interaction with members of the Management Board, Deputy Chairman of the Management Board - Technical Director and Managing Directors within the supervised areas of the Company's activities. Making proposals to the Chairman of the Management Board on personnel issues, as well as on business trips, incentives, and disciplinary penalties for employees supervised by the Company's structural divisions. Signing of income, expenditure and other contracts on behalf of the Company, within the scope of its competence. Control and acceptance of delivered goods, completed works and rendered services under concluded revenue, expenditure and other contracts of the Company within the scope of its competence. Ensuring timely signing of acts of acceptance and transfer of goods/completed works/services rendered in accordance with the Company's revenue, expenditure and other agreements within its competence. Working with documents marked "For official use only", "Confidential". Representing the interests of the Company on supervised issues in relations with third parties. Other powers defined by the administrative documents of the Chairman of the Management Board and other internal regulatory documents of the Company.

High

Employees authorized to make decisions on the organization and conduct of public procurement	Organization and conduct of public procurement of goods, works and services	High
Heads of structural divisions	Coordination of the activities of employees of the structural division. Control over the executive and labor discipline of employees of the structural unit. Control over the effective use of the resources of the structural division. Coordination of acts of goods delivered, works performed and services rendered within the framework of the expenditure item of the structural division. Participation in the evaluation of employee performance, as well as in the evaluation of candidates for vacant positions in the structural unit. Preparation of an application for admission, transfer, remuneration, probation, and removal of disciplinary action. Working with documents of a structural unit marked "For official use", "Confidential". Other powers defined by job descriptions approved in accordance with the established procedure and other internal regulatory documents of the Company.	Average
Employees who are members of commissions (competitive, disciplinary, as part of internal investigations, etc.)	Studying materials, working with confidential data, making recommendations addressed to the Chairman of the Management Board of the Company to determine the decision on taking legal, organizational, disciplinary and other measures.	Average
Senior Developer	Participation in the design, development and testing of information system modules in accordance with the requirements for their functional purpose within the framework of the Company's IT projects. The implementation of markup and customization of web page styles. Correction of software errors in the supported information system functionality as part of the implementation of IT projects. Code analysis and optimization using tools to improve the quality of the Company's products and development productivity within the framework of the Company's IT projects. Designing the database structure within the framework of the Company's IT projects. Analysis and optimization of the database and queries to it within the framework of the Company's IT projects. Analysis of the effectiveness of tools for IT projects of the Company.	High
Lead Developer	Participation in the design, development and testing of information system modules in accordance with the requirements for their functional purpose within the framework of the Company's IT projects. The implementation of markup and customization of web page styles. Correction of software errors in the supported information system functionality as part of the implementation of IT projects. Code analysis and optimization using tools to improve the quality of the Company's products and development productivity within the framework of the Company's IT projects. Designing the database structure within the framework of the Company's IT projects. Analysis and optimization of the database, and queries to it within the framework of the Company.	High

Developer	Participation in the design, development and testing of information system modules in accordance with the requirements for their functional purpose within the framework of the Company's IT projects. Development and testing of functions and procedures in modules/subsystems of information systems in accordance with the requirements for their functional purpose within the framework of the Company's IT projects under the supervision of a senior developer or a leading developer of a structural unit. Marking up and configuring web page styles. Correction of software errors in the supported information system functionality as part of the implementation of IT projects. Code analysis and optimization using tools to improve the quality of the Company's products and development productivity within the framework of the Company's IT projects. Designing the database structure within the framework of the Company's IT projects.	High
Senior Analyst	Examination, analysis of several interrelated parts of the subject area, business processes within the framework of the IT project, which is involved in the implementation. Development of an information model for the functioning of supervised business processes within the framework of an IT project. Collecting and formalizing requirements "imposes" requirements on the information system within the framework of an IT project. Implementation of the development of task statements within the framework of an IT project. Performing work on writing regulatory and technical documents as part of an IT project. Participation in software configuration and testing for compliance with the requirements. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial).	Average
Lead Analyst	The management of a separate part of the IT project (analysts), to which he is involved. Assessment of the functional scope, risks, labor costs and the cost of planned IT projects, of which he is a specialist in the subject area. Preparation of recommendations for managing the volume, risks, and cost of planned IT projects. Survey, analysis of several interrelated parts of the subject area, business processes within the framework of the IT project, which is involved in the implementation. Development of an information model for the functioning of supervised business processes within the framework of an IT project. Collecting and formalizing requirements "imposes" requirements on the information system within the framework of an IT project. Implementation of the development of task statements within the framework of an IT project. Performing work on writing regulatory and technical documents as part of an IT project. Participation in software configuration and testing for compliance with the requirements. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial).	Average

Analyst	Analysis of a part or several interrelated parts of a subject area, business processes within the framework of an IT project, which is involved in the implementation. The collection and formalization of requirements "imposes" requirements on the information system within the framework of an IT project. Implementation of the development of task statements within the framework of an IT project. Performing work on writing regulatory and technical documents as part of an IT project. Participation in software configuration and testing for compliance with the requirements. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial).	Average
Senior Consultant	Participation in software configuration and testing for compliance with the requirements. Performing work on writing operational documents as part of an IT project. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial). Conducting an indepth analysis of the problems assigned to it in the service desk of the Company's Contact Center, and provides relevant comments. Participation in maintenance and technical support of information systems. Transfer and control of the problem elimination with a detailed description to the developer. If an unknown situation / error / problem is identified, consult with the responsible analyst and, if necessary, transfer it to the analyst of the structural unit. Providing user advice on the operation of information systems. Tracking changes in request statuses by analysts.	Average
Lead Consultant	Participation in software configuration and testing for compliance with the requirements. Performing work on writing operational documents as part of an IT project. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial). Conducting an indepth analysis of the problems assigned to it in the service desk of the Company's Contact Center, and provides relevant comments. Participation in maintenance and technical support of information systems. Transfer and control of the problem elimination with a detailed description to the developer. If an unknown situation / error / problem is identified, consult with the responsible analyst and, if necessary, transfer it to the analyst of the structural unit. Providing user advice on the operation of information systems. Tracking changes in request statuses by analysts.	Average
Chief Consultant	Participation in software configuration and testing for compliance with the requirements. Performing work on writing operational documents as part of an IT project. Monitoring the execution of tasks for supervised business processes throughout the entire lifecycle of an IT	Average

	project. Participation in the work on the organization of the transition of the information system and its functional parts into operation (experimental, industrial). Conducting an indepth analysis of the issues assigned to it in the service desk of the Company's Contact Center and providing relevant comments. Participation in maintenance and technical support of information systems. Transfer and control of the problem elimination with a detailed description to the developer. If an unknown situation / error / problem is identified, consult with the responsible analyst and, if necessary, transfer it to the analyst of the structural unit. Providing user advice on the operation of information systems. Tracking changes in request statuses by analysts.	
Senior Engineer	Administration of server and network equipment, virtualization systems within the framework of the Company's projects. OS administration within the framework of the Company's projects. Administration of AS and DBMS within the framework of the Company's projects. Collection and analysis of hardware requirements for information systems under development within the framework of the Company's projects. Participation in the development of detailed architecture of information systems within the framework of the Company's projects. Building the hardware architecture of the Company's projects. Implementation of regulatory procedures for backup, archiving and restoration of OS, AS and other IS elements within the framework of the Company's projects. Control over the use of network resources, organization of access to local and global networks. Identification of network equipment malfunctions, user errors, and network software. Participation in restoring system performance in case of failures and failures of server and network equipment, AS. Monitoring the work of the AS, server and network infrastructure, and developing proposals for the development of the IS infrastructure. Ensuring network security (protection against unauthorized access to information, viewing or modification of system files and data), including the security of inter-network interaction.	Average
Lead Engineer	OS administration within the framework of the Company's projects. Administration of AS and DBMS within the framework of the Company's projects. Collection and analysis of hardware requirements for information systems under development within the framework of the Company's projects. Participation in the development of detailed architecture of information systems within the framework of the Company's projects. Building the hardware architecture of the Company's projects. Implementation of regulatory procedures for backup, archiving and restoration of OS, AS and other IS elements within the framework of the Company's projects. System configuration on the server. Support for the working status of the AS server. Detecting server hardware and OS malfunctions. Participation in the restoration of system operability in case of failures and failures of network equipment. Monitoring of server equipment, developing proposals for the development of network infrastructure. DBMS user account management. Installation and configuration of DBMS operation. Logging	Average

Chief Engineer