

Compliance Service	E-Finance Center JSC	page/of
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PRE-APPROVED

by decision of the Audit Committee
of the Board of Directors of E-Finance
Joint-Stock Company
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(Minutes No. 10)


APPROVED

by decision of the Board of Directors
of E-Finance Center
Joint-Stock Company
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Anti-Corruption Policy of E-Finance Center Joint-Stock Company

Astana, 2025

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1. General Provisions

1. The Anti-Corruption Policy of Y-Finance Center Joint-Stock Company (hereinafter - the Policy, the Company respectively) was prepared in accordance with the Anti-Corruption Legislation of the Republic of Kazakhstan (hereinafter - the RoK) and other internal normative documents of the Company.

2. This Policy states:

- 1) the main provisions and principles of combating corruption in the Company;
- 2) goals and objectives in the area of combating corruption;
- 3) requirements of the Anti-Corruption Legislation of the RoK and the obligation to comply with it;
- 4) set of measures to prevent and combat corruption;
- 5) responsibility for compliance with this Policy.

3. The main purpose of this Policy is to create a compliance culture within the Company, to ensure that the Company and its officials and employees adhere to high standards of conduct, to strengthen the Company's business reputation and to increase trust in the Company.

2. Applicability

4. This Policy is an internal normative document that defines the main areas of the Company's anti-corruption activities and is mandatory for all officials and employees of the Company to read and strictly comply with.

5. This Policy shall be posted on the Company's corporate website.


3. Terms and definitions used in this Policy

6. The following basic terms and definitions are used in this Policy:

1) **Anti-Corruption Legislation of the RoK** - the Law of the Republic of Kazakhstan "On Combating Corruption" and other normative legal acts on combating corruption;

2) **Anti-corruption culture** – activities carried out by entities counteracting corruption within their competence, aimed at preserving and strengthening within society a system of values, ethical norms, convictions, and behaviors that exist in the Company and interact with the Company's control structures and systems, for the purpose of developing behavioral standards that contribute to the implementation of this Policy and the operation of the Standard;

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3) **anti-corruption monitoring** - the Company's activity to collect, analyze and evaluate information related to the effectiveness of the Company's anti-corruption measures;

4) **anti-corruption standard** - a system of recommendations established for a particular area of the Company's activities, aimed at preventing corruption;

5) **close relatives** - parents (parent), children, adoptive parents (adopters), adopted, full and half brothers and sisters, grandfather, grandmother, grandchildren, in-laws refer to full and half brothers and sisters, parents and children of spouse;

6) **internal analysis of corruption risks** - activities of the Company to identify and study the causes and conditions conducive to the commission of corruption offenses;

7) **official** - a person permanently, temporarily or by special authority performing managerial or administrative functions in the Company;

8) **candidate** - a person who is a candidate for a position related to the performance of managerial or administrative functions;

9) **corruption** - the illegal use by an official and/or employee of the Company of their official powers and related opportunities in order to obtain or derive personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as the bribery of these persons by providing benefits and advantages;

10) **corruption offence** - an unlawful guilty act (action or inaction) having signs of corruption, for which the legislation of the Republic of Kazakhstan establishes administrative or criminal liability;

11) **corruption risk** - the possibility of causes and conditions conducive to the commission of corruption offenses;


12) **counterparty** - an individual or legal entity with which the Company has entered or plans to enter into a legally regulated relationship;

13) **Compliance Manager** – an employee who has an employment relationship with the Company, appointed by the Company's Board of Directors, and heading the Compliance Service, which performs the functions of the anti-corruption compliance service in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulatory documents;

14) **conflict of interest** – a contradiction between the personal and/or organizational interest of officials and their official powers, in which the personal or organizational interest of such persons may result in failure to perform and/or improper performance of their official duties;

15) **corruption prevention** - the Company's activities to study, identify, limit

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and eliminate the causes and conditions contributing to corruption offenses by developing and implementing systems, preventive measures;

16) **combating corruption** - the Company's activities within its authority to prevent corruption, including building an anti-corruption culture in the Company, identifying and eliminating the causes and conditions contributing to corruption offenses, as well as detecting, suppressing, disclosing and investigating corruption offenses and eliminating their consequences;

17) **employee** - an individual who has an employment relationship with the Company and directly performs work under an employment contract;

18) **in-laws** - full and half brothers and sisters, parents and children of the spouse;

19) **Standard** – the international standard ISO 37001:2025 “Anti-bribery management systems — Requirements and guidance for use.”;

20) **Compliance Service** – a structural subdivision included in the organizational structure of the Company, directly accountable to the Company’s Board of Directors, performing the functions of the anti-corruption compliance service in accordance with the legislation of the Republic of Kazakhstan and the Company’s internal regulatory documents;

7. The definitions used but not disclosed in this Policy correspond to the definitions used in the laws of the Republic of Kazakhstan, internal regulatory documents of the Company and (or) regulatory legal acts of the Republic of Kazakhstan.

4. Basic principles of combating corruption

8. The main principles of combating corruption in the Company are:


1) **zero tolerance for any manifestation of corruption** - the Company adheres to the principle of zero tolerance for corruption in any form or manifestation in its activities.

The principle of zero tolerance of any manifestation of corruption means a strict prohibition for Company officials and employees acting on behalf of the Company or in its interests, directly or indirectly, personally or through any intermediary, to engage in corrupt practices regardless of the business practices in a particular country;

2) **The "Tone from the Top" principle** - the Company's officials set an example to the Company's employees by their conduct of observing and promoting high ethical standards of business conduct and intolerance of corruption in any form;

3) **the principle of due diligence** - taking a set of measures and actions aimed at obtaining necessary and reliable information about the Counterparty to minimize the

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risk of business relationships with Counterparties that may be involved in corrupt activities or tolerate corrupt practices;

4) **the principle of inevitability of punishment** - the Company declares the inevitability of punishment for Company employees regardless of their position, length of service and other conditions if they commit corruption offenses in the performance of their official duties;

5) **involvement of employees** - the Company informs its officials and employees about provisions of anti-corruption legislation of the Republic of Kazakhstan, this Policy and the anti-corruption management system, and welcomes their active participation in formation and implementation of anti-corruption standards and procedures;

6) **legality and compliance of this Policy with the current legislation of the Republic of Kazakhstan and generally accepted norms** - the Company strictly complies with the anti-corruption legislation of the Republic of Kazakhstan and other countries where it operates or plans to operate, and any of its actions or omissions does not contradict the norms of applicable anti-corruption legislation;

7) **monitoring and control** - the Company monitors the anti-corruption management system, measures to reduce corruption risks, monitors compliance with the implemented procedures for preventing and combating corruption and their effectiveness;

8) **interaction and coordination** - the Company shall ensure interaction and cooperation in the area of anti-corruption activities with government agencies and third parties of the Company, as well as coordination of actions in the process of combating corruption;

9) **principle of openness** - informing counterparties, partners and the public about the anti-corruption standards adopted by the Company.


5. Goals and Objectives of the Policy

9. This Policy is prepared for:

- 1) implementation of effective measures to prevent corruption in the Company;
- 2) creation of a uniform understanding among the Company's officials and employees and its counterparties of the Company's position of rejection of corruption offenses and actions in any of their forms and manifestations;
- 3) reduction of the risks of corruption in the Company.

10. Achievement of anti-corruption goals is realized by solving the following tasks:

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1) forming an understanding of zero tolerance for any corrupt practices among officials and employees of the Company;

2) summarizing, informing and explaining the basic requirements of the Anti-Corruption Legislation of the Republic of Kazakhstan, this Policy and the anti-corruption management system that can be applied to the Company, officials and employees;

3) providing information channels for reporting cases of corruption;

4) establishing obligation of the Company officials and employees to know and comply with principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, this Policy, anti-corruption management system, as well as to conduct legal procedures to prevent and combat corruption;

5) continuous improvement of the anti-corruption management system;

6) monitoring the effectiveness of the anti-corruption management system;

7) prohibition of prosecution and respect for privacy of persons who report an incident of a corrupt nature or suspicion of corruption, based on honest intentions or reasonable assumption;

8) encouraging confidential reporting on their doubts without fear of reprisals;

9) clarification of the powers and independence of compliance manager;

10) explanation of the consequences of non-compliance with this Policy.

11) ensuring compliance with the Company's anti-corruption management system.

11. Matters not regulated by this Policy shall be governed in accordance with the laws of the RoK and the Company's internal normative documents.


6. Requirements of the Anti-Corruption Legislation of the RoK and obligations to implement it

12. In accordance with the Anti-Corruption Legislation of the RoK, corruption crimes/offenses for which liability is provided are the following (but not limited to the listed ones):

1) misuse/appropriation/theft of the Company's assets, funds, their misuse, misappropriation or embezzlement of entrusted other people's property, committed by an official, if these acts are associated with the use of his/her official position;

2) legalization (laundering) of money and/or other property obtained by criminal means, committed by an official, if these acts are associated with the use of his/her official position;

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3) giving undue preference to legal entities and/or individuals in obtaining material and non-material values when making decisions in the course of the Company's business processes;

4) unlawful establishment of administrative barriers (*requirements that are not provided for by law, internal regulatory documents of the Company*), bureaucratization of decision-making processes related to the Company's core business;

5) abuse (excess) of official (official) power - the use of one's official (official) power and related opportunities to obtain property benefits and advantages for oneself or for other persons;

6) use of official and other confidential information in order to obtain or derive property and non-property benefits and advantages;

7) unlawful participation in entrepreneurial activity;

8) taking a bribe, giving a bribe, mediation in bribery;

9) inactivity in the performance of official duty;

10) fraud;

11) negligence;

12) employment of persons who have previously committed corruption offenses;

13) provision of illegal material remuneration by individuals and legal entities;

14) receiving an unlawful material reward by an official.


13. The Company, its officials and employees are obliged to comply with the norms of anti-corruption legislation of the Republic of Kazakhstan, as well as principles and requirements of this Policy and the anti-corruption management system. In implementing this Policy, the Company assumes that its officials and employees, directly or indirectly, personally or through third parties, are prohibited to be engaged in corrupt practices, as well as:

1) to offer, promise or give a bribe, i.e., to give or promise to give any financial or other benefit/advantage with the intent to induce a person to perform his/her official duties improperly;

2) to solicit, agree to accept or accept bribes, i.e., to receive or agree to receive any financial or other benefit/advantage for improper performance of one's official duties;

3) to offer, promise or make payments, except as provided by applicable law, to give gifts to persons authorized to perform public functions, as well as persons equated to them, including foreign officials for expediting or simplifying established procedures;

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4) to offer, promise or make payments to third parties when there is a suspicion that payments may be used to expedite or facilitate established procedures;

5) to offer, promise or provide employment with the Company (including on a temporary basis) in exchange for a personal benefit;

6) to facilitate or accept excessive or fictitious payments from third parties;

7) to give or receive gifts or hospitality that contradict the requirements of the anticorruption legislation of the RoK and internal documents of the Company.

14. The Company's officials shall strictly observe the following standards of conduct in their professional activities:

1) to comply with requirements of the legislation of the Republic of Kazakhstan, this Policy and the anti-corruption management system;

2) to be honest and decent in business relations, to refrain from any dishonest ways of performing official duties;

3) not to commit acts that may discredit the Company;

4) not to use for personal purposes the official position, confidential and insider information, tangible and intangible assets of the Company;

5) not to allow illegal actions, or actions that may raise suspicions about their legality and ethics;

6) to support and demand from colleagues to maintain a high legal anti-corruption culture;

7) to refrain from assisting anyone in the course of business and/or other activities related to income generation;

8) not to induce or encourage other employees to commit corruption offenses;

9) not to perform official duties if there is a conflict of interest.

10) to report in good faith or on the basis of reasonable suspicion any corruption violations, manifestations or suspicions of them, violations or deficiencies in the Company's anti-corruption management system, higher management and Compliance Service.


15. Employees of the Company shall:

1) refrain from committing and/or participating in the commission of corruption offenses for or on behalf of the Company;

2) refrain from behavior that could be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of the Company;

3) inform the immediate supervisor of a potential or actual conflict of interest arising for the employee. In case of doubts regarding the correctness of their actions or

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any other norms of conduct, the officials and employees of the Company may contact the Compliance Service.

4) report in good faith or on the basis of reasonable suspicion any corruption violations, manifestations or suspicions of them, violations or deficiencies in the Company's anti-corruption management system, higher management and Compliance Service.

7. Anti-Corruption Restrictions

16. In order to prevent Company officials from engaging in actions that may lead to the exercise of their authority in personal, group and other non-business interests, the said persons shall assume anti-corruption restrictions on:

1) inadmissibility of joint service (work) of close relatives, spouses, and in-laws;

2) use of official and other information that is not subject to official dissemination, in order to obtain or derive property/non-property benefits and advantages;

3) inadmissibility of accepting gifts in connection with the performance of official duties, with the exception of symbolic tokens of appreciation.

4) to open and hold accounts (deposits) in foreign banks located outside the RoK, and to keep cash and valuables in foreign banks located outside the RoK.

5) not to participate in gambling and/or betting in gambling establishments falling under the definition provided by the Law of the RoK "On Gambling Business," as well as in gambling and/or betting conducted in unauthorized places or through telecommunications networks, including the Internet.


The consent of these persons to accept anti-corruption restrictions shall be recorded in writing.

Failure to accept anti-corruption restrictions by the Company's officials shall result in the refusal to hire or dismissal from the position; failure to comply with such restrictions in cases where there is no evidence of a criminal or administrative offence shall be grounds for termination of the official's powers.

17. Officials of the Company may not hold positions that are directly subordinate to positions occupied by their close relatives, spouse, or in-laws.

The Company officials who violate the requirements of this clause of the Policy, if they do not voluntarily eliminate the said violation within three months of discovering it, shall be transferred to positions excluding such subordination, and if

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such transfer is not possible, one of such officials shall be dismissed from the position or otherwise relieved of said functions.

8. Anti-Corruption Standard

18. Anti-corruption standards is aimed at achieving an atmosphere of intolerance to any manifestation of corruption in the Company by creating a system of value and moral anti-corruption behavioral guidelines for the Company employees in the performance of their official functions.

19. The anti-corruption standards set forth the following standards of conduct for the Company's employees:

1) to be guided by the principle of legality, requirements of the Constitution, laws and other normative legal acts of the RoK, and strictly comply with anti-corruption laws;

2) to ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) not to commit acts that may discredit the Company;

4) not to be guided by personal and/or self-interest in the performance of official duties;

5) to refrain from making improper requests to colleagues and supervisors that violate the established order of relations, which may affect their impartial official decision-making;

6) not to accept gifts in connection with the performance of official powers;

7) to be active in combating corruption, in the disclosure of corruption offenses;

8) to notify the direct or immediate supervisor in writing of doubts about the legitimacy of the order received for execution without delay;

9) to appeal to higher management if the immediate supervisor himself or herself is involved in a conflict of interest;


10) to support and demand from colleagues to maintain a high legal anti-corruption culture;

11) to refrain from representing and lobbying third parties and from acting on their behalf;

12) not to use the means of logistical, financial and information support, as well as official information for non-duty purposes;

13) not to participate in the development, discussion, or adoption of decisions, or otherwise influence decisions that give rise to a conflict of interest.

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20. The formation of an anti-corruption culture in the Company shall be carried out through a set of measures of an educational, informational and organizational nature.

21. The Company shall take measures to inform and explain principles and norms of the applicable anti-corruption legislation of the Republic of Kazakhstan, this Policy, anti-corruption management system and other internal documents in the field of anti-corruption, including training of the Company's employees.

The methods of conducting training sessions (lectures, seminars, trainings) shall be determined independently by the Compliance Service.

Information on the time and individuals who have completed the training, as well as the training program, shall be subject to mandatory storage in accordance with the established procedure.

22. The training program is aimed at developing among the Company's employees an understanding of:

1) the existing corruption risks and the potential harm that such risks may cause to employees and the Company;

2) the circumstances under which a corruption offense may arise or an attempt thereof may be made, as well as the methods for their timely identification;

3) methods for detecting and responding to attempts of corruption or bribery extortion;

4) methods for facilitating the prevention of corruption offenses and identifying key indicators of corruption risks;

5) information on available training formats and resources for raising awareness in the field of anti-corruption.


23. The Compliance Service develops the training program and updates it as necessary.

24. For the purpose of assessing employees' knowledge in the field of anti-corruption, the Compliance Service regularly evaluates the knowledge acquired by employees through tests, surveys, and other forms of assessment.

25. The Company encourages the active participation of all its employees in the development of anti-corruption policies and procedures.

26. Managers at all levels ensure compliance with the Anti-Corruption Standard and the development of an anti-corruption culture in their relations with subordinates.

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9. Set of Measures to Prevent and Combat Corruption;

9.1. Organization of the "Hot Line" and informing

27. "Hotline" is a safe and confidential information channel designed to provide employees of the Company and other third parties with information about intentions or facts of corruptive actions against the Company and/or its employees, counterparties, allowing, inter alia, to transmit information anonymously.

28. The Company guarantees that the principle of confidentiality with respect to all applicants and that the information submitted will be checked within the time frame set by the Company and the employee will not be subjected to sanctions (dismissed, demoted, deprived of a bonus, etc.) if he/she reported an alleged fact of corruption, including if the facts specified in the application were not confirmed during the check. However, if such a report is made with malicious intent, such as to defame or obtain any preferential treatment or to avoid liability, such employee will be subject to disciplinary action in accordance with the provisions of this Policy and applicable law.

29. Information on the "hotline" and other information channels shall be posted on the Company's corporate website.

30. The Company accepts anonymous reports on cases of corruption and checks the reliability of information they contain. In case of confirmation of the corruption case, the Company informs the authorized state body to make a decision on taking measures.

31. The Chairman of the Management Board of the Company monitors the timely and effective operation of the hotline. Such monitoring is carried out by reading the periodic report of the Compliance Service.


32. The Compliance Service is the responsible structural subdivision of the Company that also handles the review of reports received through the hotline and provides feedback to the reporting person, except in cases of anonymous reports.

9.2. Prevention and Resolution of Conflict of Interests

33. Management of conflicts of interest is one of the most important anti-corruption mechanisms. The Company pays great attention to the prevention and management of risks associated with conflicts of interest.

34. In the performance of their duties, officials and employees of the Company shall be guided by the interests of the Company and shall avoid situations or circumstances in which their personal interests would conflict with the interests of the Company. In the event of a conflict of interest (or the possibility thereof), officials and

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employees of the Company are required to inform their immediate supervisor or the Company's senior management in writing, while simultaneously notifying the Compliance Service, as soon as they become aware of such circumstances.

9.3. Internal Investigations of Corruption Offenses

35. All reports of corruption offenses in the Company shall be verified or an internal investigation shall be conducted with the participation of the relevant structural divisions of the Company within a reasonable period of time.

36. If the results of an internal investigation reveal corruption, the investigation is completed by taking corrective measures based on the principle of zero tolerance for any manifestation of corruption, up to and including termination of employment and transfer of materials to the relevant authorized state bodies, as well as improving control procedures.

9.4. Personnel Management

37. The Company adheres to the principles of objectivity and honesty in making personnel decisions. In order to eliminate corruption risks in the hiring, evaluation, promotion and dismissal of personnel, the Company:

1) shall develop and approve, in accordance with the established procedure, transparent personnel selection and recruitment procedures and appropriate qualification requirements for the position;


2) when conducting competitive selection procedures, to implement elements of anonymous hiring that provide for the exclusion of candidates' names, gender, and nationality at the early stages of selection;

3) shall conduct a screening of candidates for employment before making a decision to begin or continue an employment relationship to determine their trustworthiness and the absence of a conflict of interest;

4) shall assess personnel performance and remuneration based on the performance of key performance indicators and/or on the results of the implementation of tasks and objectives, including performance, efficiency, compliance with deadlines for task performance, as well as professional achievements;

5) shall decide on promotion to a higher position based on the business qualities and qualifications of the employee;

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6) exclusion of employment of individuals within one (1) year who have conducted an inspection of the Company's activities or whose official duties were directly related to the Company's activities in accordance with their competence;

7) shall carry out the procedure for termination of employment relations with the employee on the grounds stipulated by the legislation of the RoK.

38. When hiring or continuing their employment with the Company, officials shall assume anti-corruption restrictions in the form set forth in Annex 1 to this Policy. The completed and signed form shall be kept in the personnel file of the Company officials from the date of their employment with the Company.

9.5. Mutual Cooperation

39. The Company cooperates with authorized state bodies and organizations on compliance with the anti-corruption laws of the RoK, in order to:

- 1) report about the cases of violations with signs of corruption;
- 2) assist in conducting investigations of violations with indications of corruption;
- 3) coordinate during audits of the Company's activities regarding compliance with anti-corruption laws of the RoK and develop joint measures to prevent and combat corruption;
- 4) provide comments/participation in meetings at the request of authorized state bodies and organizations related to the issues of anti-corruption legislation of the RoK.


In case of encountering corruption, the employees of the Company may call the toll-free number of the authorized anti-corruption body – 1424.

10. Liability for Non-Performance (Improper Performance) of the Policy

40. Each official and employee of the Company shall be responsible for compliance with the requirements of this Policy, regardless of his/her position. The commission by official and/or employee of the Company of corruption offenses is recognized as a gross violation of employment duties. An official and employee of the Company, regardless of status and position, is subject to liability.

41. Bringing to responsibility shall be carried out in accordance with the legislation of the Republic of Kazakhstan. If an official and/or employee of the Company is found to have been involved in committing a corruption offense, the Company shall be entitled to bring the official and/or employee to disciplinary

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responsibility, including termination of their employment contract, in accordance with the procedure established by the applicable laws of the RoK.

42. If there are sufficient grounds, materials of internal investigation on the above facts shall be transferred to law enforcement authorities with a statement to bring the guilty persons to administrative or criminal responsibility.

43. In the event of harm and damage to the Company, the Company shall be obliged to bring a civil action against the perpetrator of corruption offenses to court.

44. Officials and employees of the Company shall be responsible for compliance with the requirements of this Policy within their competence.

45. Officials and employees of the Company, upon employment, are required to confirm, in the form provided in Annex 2 to this Policy, their commitment (confirmation) to faithfully comply with this Policy. Furthermore, officials and employees of the Company, when extending their employment with the Company, are required to confirm their compliance with this Policy annually, no later than the first half of the year, in the form provided in Annex 3 to this Policy.

11. Obligations of the Company Management Board

46. The Company Management Board accepts the following obligations:

1) timely allocate resources to ensure implementation of this Policy;
 2) form a culture of intolerance to corruption by personal example;
 3) comply with requirements of the anti-corruption management system and participate in its continuous improvement;

4) encourage employees and any interested persons to inform confidentially on their doubts without fear of reprisals;


5) ensure compliance with the legitimate rights and interests, protection of business reputation of the Company's employees, partners, contractors and other persons;

6) organize compliance with the trade secret mode in implementation of anti-corruption measures;

7) ensure that the Company's employees are informed about provisions of the anti-corruption legislation of the Republic of Kazakhstan, international standard ISO 37001:2016 Anti-corruption management system. Requirements and Guidelines for the Application" (hereinafter - the Standard), internal procedures and this Policy.

8) increase responsibility and explain the consequences for employees, regardless of their position, work experience and other conditions, in case they commit corruption offenses in performance of their work duties, failure to comply with anti-

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Sh.K. Turash	Compliance Manager	-	

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corruption policies, standards and procedures;

9) control and monitor effectiveness of the anti-corruption management system, introduced anti-corruption procedures, as well as analyze their implementation;

10) implement and comply with the requirements of the anti-corruption management system;

11) guarantee that the staff will not suffer from harassment, discrimination or disciplinary action (for example, threats, isolation, demotion, obstruction of promotion, transfer to another position, termination of an employment contract, psychological pressure, reprisal or other types of bullying) for:

1 - refusal to participate or refusal of any action where, in his/her opinion, level of corruption risk will be higher than low, and which has not been minimized by organization;

2 - expression of concern or a message made based on honest intentions or reasonable assumption about an attempted, actual attempt or suspicion of bribery, or about a violation of the anti-corruption policy or management system (except in cases where the person is a participant in violation).

12. Duties of the Company's employees

47. All employees of the Company undertake the following obligations:

1) strictly comply with and adhere to the legislative requirements on combating corruption, requirements of the Standard, internal procedures and accepted ethical conduct of the Company;

2) identify, manage corruption risks, conduct anti-corruption measures aimed at a positive result;

3) ensure functioning and continuous improvement of the Company's anti-corruption management system;


4) openly conduct activities to inform partners, contractors and the public about the accepted anti-corruption standards of doing business;

5) create an open and friendly atmosphere in the team.

13. Compliance Service

48. The Compliance Service is an independent structural division of the Company and has all necessary powers to review, analyze, take appropriate measures to prevent and identify corruption schemes.

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Information on possible or known cases of corruption can be transmitted to the Company through the following communication channels that ensure confidentiality:

- phones of the Compliance Service hotline: +7 (7172) 73-55-21;
- e-mail address of the Compliance Service: compliance@ecc.kz.


14. Final Provisions

49. This Policy is approved by the decision of the Board of Directors and may be amended in the event of changes in the legislation of the RoK or applicable international legislation, as well as taking into account new trends in global and Kazakhstani practices of corporate business ethics.

50. By posting this Policy or its individual provisions on the Company's official website, the Company openly declares its rejection of corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all Company employees, counterparties and other third parties, and promotes an anti-corruption culture in society and among Company employees through information and training.

51. Other legal relations not covered by this Policy shall be governed by the laws of the RoK. If there are contradictions between this Policy and the norms of the legislation of the RoK, the norms of the legislation of the RoK shall apply.

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Sh.K. Turash	Compliance Manager	-	

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Annex 1
to the Anti-Corruption Policy of
E-Finance Center
Joint-Stock Company

Obligation to comply with the Anti-Corruption Policy of E-Finance Center Joint-Stock Company

1. _____ confirms that
(*position, full name*) he/she got acquainted with content of the Anti-Corruption Policy of E-Finance Center Joint-Stock Company and undertakes to comply with its provisions.

2. _____ undertakes:
(*position, full name*)


2.1. Not to participate in corrupt actions directly or indirectly, personally or through mediation of third parties, including not to offer, give, promise, ask or receive bribes and facilitation fees in any form (facilitation payments), including in the form of cash, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and self-government bodies, Kazakhstan and foreign government officials, private companies and their representatives.

2.2. To refrain from behavior that may be interpreted by others as a willingness to commit or participate in corruption offense in the interests or on behalf of Company.

2.3. To report, based on honest intentions or reasonable assumption, by phone +7 (7172) 73-55-21 or email: compliance@ecc.kz of the compliance manager responsible for functioning of the anti-corruption management system, as well as through contact form (<https://www.ecc.kz/ru/company/contacts>):

- on suspicion of bribery or its actual attempt;
- on cases of inducing an employee to commit corruption offenses;
- on information that has become known to the employee about cases of corruption offenses committed by other employees, contractors of the Company or other persons;
- on possible occurrence, or a conflict of interest that has already arisen with participation of employee;
- on violation or weakening of the anti-corruption management system.

Prepared by:

Full name	Position	Structural division	Signature
Sh.K. Turash	Compliance Manager	-	

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3. It is explained to the employee that no employee of the Company, including him/her, will be subjected to sanctions and harassment (for example, threats, isolation, demotion, obstruction of promotion, transfer to another position, termination of an employment contract, psychological pressure, reprisal or other types of bullying) by the Company if:

- he/she has refused to participate or refused any action where, in his/her opinion, level of corruption risk is higher than low, as defined in the register of corruption risks, and which has not been minimized by the Company.

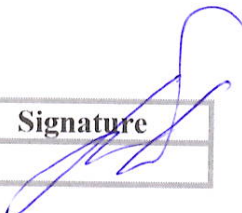
- he/she reported the alleged case of corruption, or if he/she refused to give or receive a bribe, to commit corrupt payment or in any other way to mediate bribery, including as a result of such refusal, the Company had lost profits or commercial and competitive advantages were not obtained.

4. The employee has been warned on possibility of bringing to disciplinary, administrative, civil and/or criminal liability for violating the anti-corruption requirements of Kazakhstan and other applicable legislation, the Company's Anti-Corruption Policy, Corporate Governance Code and anti-corruption management system.

5. It is explained to the employee that if he/she has additional questions on principles and requirements of the Company's Anti-Corruption Policy, anti-corruption management system and applicable anti-corruption legislation, he/she may contact the Company's Compliance Manager responsible for monitoring compliance with the Policy.

_____, 20____ / _____

Prepared by:

Full name	Position	Structural division	Signature
<i>Sh.K. Turash</i>	<i>Compliance Manager</i>	-	

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Annex 2
to the Anti-Corruption Policy of
E-Finance Center
Joint-Stock Company

Confirmation

Please check the appropriate boxes


- ☐ I confirm that I have studied the Anti-Corruption Policy of E-Finance Center Joint-Stock Company;
- ☐ I undertake to strictly follow the requirements established by the Anti-Corruption Legislation of the RoK and the Anti-Corruption Policy of E-Finance Center Joint-Stock Company;
- ☐ I have been notified that if I violate the Anti-Corruption Legislation of the RoK and the Anti-Corruption Policy of E-Finance Center Joint-Stock Company, I may be held liable, including dismissal from my position, in the manner prescribed by the laws of the RoK.

(full name)

(position)

(signature, date)

Prepared by:

Full name	Position	Structural division	Signature
Sh.K. Turash	Compliance Manager	-	

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Annex 3
to the Anti-Corruption Policy of
E-Finance Center
Joint-Stock Company

Confirmation

I hereby confirm that I strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy of E-Finance Center Joint-Stock Company.

(full name)

(position)

(signature, date)

Prepared by:

Full name	Position	Structural division	Signature
Sh.K. Turash	Compliance Manager	-	