**Analytical report on the results of an internal analysis of corruption risks in the activities of the "E-Finance Center" joint-stock company**

**The introductory part**

**The basis for conducting an internal analysis of corruption risks:**

The Law of the Republic of Kazakhstan "On Combating Corruption", Standard Rules for conducting an internal analysis of corruption risks, approved by Order

No. 12 of the Chairman of the Agency for Civil Service Affairs and Anti-Corruption of the Republic of Kazakhstan dated October 19, 2016, Methodological Recommendations on conducting internal analysis of corruption risks approved by the Chairman of the Agency for Combating Corruption in the Republic of Kazakhstan dated April 7, 2021, the order of the Chief Executive Officer of "E-Finance Center" JSC (hereinafter – the Company) dated April 29, 2021 No. 129 "On conducting an internal analysis of corruption risks in the activities of E-Finance Center the joint-stock company".

**The deadline for conducting an internal analysis of corruption risks is:** from April 27 to May 28, 2021.

**The analyzed period of activity of the object of internal analysis on corruption risks:** 2020.

**Full name of the authorized person:**

Kaliakparov Maksat Kaiyrzhanuly – Deputy Chief Executive Officer of the Company (in accordance with the order of the Chief Executive Officer of the Company dated April 22, 2021, No. 114 "On determining the structural unit performing the functions of the anti-corruption compliance service in " E-Finance Center " the joint-stock company).

The composition of the working group for conducting an internal analysis of corruption risks has been approved by Order No. 129 of the Chief Executive Officer of the Company dated April 29, 2021 "On conducting an internal analysis of corruption risks in the activities of "E-Finance Center" the joint-stock company.

**The descriptive part**

**Personnel management.**

*(2)* The rules for the selection and adaptation of employees at "E-Finance Center" JSC have been approved by the Management Board of the company's decision dated March 15, 2021 (Minutes No. 8) (hereinafter - the Rules):

*Name of corruption risk:*

* lack of video/audio recording of interviews and testing procedures;
* absence of an automated testing system;
* the absence of competition committees in the selection of candidates and regulation of their work.

*Description of the corruption risk:*

Due to the lack of an automated testing system, there is a possibility of direct contact between a candidate and employees responsible for testing. Measures are taken to video/audio record interviews and testing procedures. The presence of competition commissions is also an important anti-corruption tool. This serves as proof of transparency, objectivity, and legality in the selection process for candidates.

*Recommendations for eliminating corruption risk:*

The Rules clearly regulate the testing procedure and implement an automated testing system.

Implement a video/audio recording system for interview and testing procedures.

To consider the proposal to create competition commissions for the selection of candidates and regulate their work.

*(2)* The regulation on the terms of remuneration, financial incentives and social support for employees at E-Finance Center JSC was approved by the decision of the Board of Directors of the Company dated January 29, 2019 (Minutes No. 1):

*The name of the corruption risk:*

There is no system of key indicators.

*Description of the risk of corruption:*

The availability of a system of key performance indicators allows for an objective assessment of employee bonuses based on work results.

*Recommendations for eliminating corruption risk:*

Implement a system of key performance indicators as a tool for rewarding employees.

*(3)* The internal labor regulations of E-Finance Center JSC were approved by the decision of the Company's Management Board dated September 20, 2019 (Minutes No. 16).

*The name of the corruption risk:*

Early removal of disciplinary penalties.

*Description of the corruption risk:*

In 2020, two default disciplinary penalties were imposed with a validity period of six months. At the same time, disciplinary penalties were lifted one month later.

*Recommendations for eliminating corruption risk:*

When imposing disciplinary penalties, establish a certain period in accordance with the labor legislation of the Republic of Kazakhstan.

There are no facts of bringing officials of the Company to justice for committing corruption offenses in 2020.