

**Action plan to eliminate corruption risks  
revealed through corruption risk assessments and internal analyses  
activities of E-Finance Center JSC**

<b>Item No.</b>	<b>Recommendation</b>	<b>Activities</b>	<b>Completion form</b>	<b>Responsible for execution</b>	<b>Deadline</b>
1	Updating/approving of the Company's internal regulatory documents concerning further development of the existing anti-corruption management system of the Company.	Updating/approving of the Company's internal regulatory documents, in Anti-Corruption Management System.	Internal regulatory documents approved by the decision of the Company's Management Board/Board of Directors	structural divisions	during 2023
2	Consider performing due diligence on certain employees (during recruitment, career progression), interaction between counterparties/business partners of the Company via due diligence tools.	Procurement of services on providing access to the security check service.	Contract for public procurement of services on providing access to the security check service	Compliance Manager, Procurement and Production Department	June-July 2023
3	Updating of the Rules of Recruitment and Adaptation of Employees of EFC JSC concerning the inclusion of the profile testing procedure, etc.	Updating of the Rules of Recruitment and Adaptation of Employees of EFC JSC	Approved by the decision of the Management Board of the Company Rules of Recruitment and Adaptation of Employees of EFC JSC or changes/additions thereto	HRD	Q2-3 2023
4	Define list of products, works and services subject for control and monitoring, commission	Definition list of products, works and services subject for control and monitoring,	Order of the Chairman of the Management Board	Procurement and Production Department, Production structural divisions	Q2-3 2023

	acceptance and check.	commission acceptance and check.			
5	Updating of the Rules for Preparation, Execution, Performance and Management of Legal Support Processes for the Activities of EFC JSC.	Updating of the Rules for Preparation, Execution, Performance and Management of Legal Support Processes for the Activities of EFC JSC in PSA.	Rules for Preparation, Execution, Performance 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	LD, HRD	Q2-3 2023
6	Implementation of the international standard ISO 37001:2016 in the Company, and relevant confirmation (certification).	ISO 37001:2016 implementation and certification.	Implementation and certification documents	Compliance Manager	during 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.	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	Compliance Manager	Q2 of 2023
8	Adopt necessary measures to approve the updated Methodology for calculating the Company's cost of services.	Approval with MF RK of the Calculation method of cost of Company's services.	Calculation method of cost of Company's services approved by the decision of the Board of Directors	AFD	Q4 of 2023