

**Information on recommendations  
following internal analysis on corruption risks in  
activities of E-Finance Center JSC**

Object of corruption risks internal analysis: E-Finance Center JSC (hereinafter - the Company).

Duration of the internal corruption risk analysis: April 3 to May 12, 2023.

Date of signing of the policy brief: 12 May 2023.

<b>Item No.</b>	<b>Recommendation</b>	<b>Completion forms according to the action plan</b>	<b>Information on recommendations</b>
<b>1.</b>	Updating/approval of the Company's internal regulatory documents concerning further development of the existing anti-corruption management system of the Company.	Internal regulatory documents approved by the decision of the Company's Management Board/Board of Directors	Executed Internal regulatory documents on the Company's anti-corruption management system have been approved: - By the decision of the Company's Management Board dated March 30, 2023 (Minutes No. 9); - by the decision of the Board of Directors of the Company dated 17 April 2023 (Minutes No. 6).
<b>2</b>	Consider performing due diligence on certain employees (during recruitment, career progression), interaction between counterparties/business partners of the Company via due diligence tools.	Contract for public procurement of services on providing access to the security check service	Executed Contract on Public Procurement of Services dated June 21 2023 No.161
<b>3</b>	Updating of the Rules of Recruitment and Adaptation of Employees of EFC JSC concerning the inclusion of the profile testing procedure, etc.	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	In process of execution.
<b>4</b>	Define list of products, works and services subject for control and monitoring, commission acceptance and check.	Instruction on organization of public procurement of goods, works and services of the Company or changes/additions approved by	In process of execution.

		the decision of the Management Board of the Company.	
5	Updating of the Rules for Preparation, Execution, Performance of Contracts and Management of Legal Support Processes for the Activities of EFC JSC.	Rules for Preparation, Execution, Performance of Contracts 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	Executed Rules for Preparation, Execution, Performance of Contracts and Management of Legal Support Processes of EFC JSC have been approved in a new edition by the decision of the Management Board of the Company dated 31 July 2023 (Minutes No. 24).
6	Implementation of the international standard ISO 37001:2016 in the Company, and relevant confirmation (certification).	Implementation and certification documents	In process of execution.
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.	Official letters and/or website announcements	Executed Outgoing letter No. 03-1/3284 dated 18 April 2023. On 10 May 2023, an announcement was published on the Company's corporate website in "News" section on the topic: Anti-corruption policy of the activities EFC JSC.
8	Adopt necessary measures to approve the updated Methodology for calculating the Company's cost of services.	Calculation method of cost of Company's services approved by the decision of the Board of Directors	In process of execution.