

## **Results of the Internal Analysis of Corruption Risks in the Activities of “Qazaqstan Investment Corporation” JSC**

**Name of the Object of the Internal Corruption Risk Analysis:**  
Activities of Joint Stock Company “Qazaqstan Investment Corporation” (hereinafter – the Company) related to procurement for the year 2024.

**Basis for Conducting the Internal Corruption Risk Analysis:**  
Order of the Chairman of the Management Board of the Company “On Conducting the Internal Corruption Risk Analysis” dated 13 May 2025 No. 40-P.

**Analysis Period:**  
From 1 January to 31 December 2024.

**Executor:**  
The Company’s Anti-Corruption Compliance Service (hereinafter – ACCS).  
The internal corruption risk analysis was conducted in the following areas:

- identification of corruption risks in internal regulatory documents affecting the Company’s procurement activities;
- identification of corruption risks in the Company’s organizational and managerial procurement activities.

As part of the internal corruption risk analysis, the ACCS reviewed the Company’s internal regulatory documents governing the procurement process to identify corruption risks and detect gaps in relevant control procedures. In addition, on a sample basis, the ACCS assessed actual procurements conducted to identify potential corruption risks and verify compliance with established procedural requirements.

### **Based on the results of the internal corruption risk analysis of the Company’s procurement activities for 2024:**

1. The Working Group did not identify corruption risks within the analyzed business processes. It should be noted that procurement of goods, works, and services is carried out through the web portal of the single procurement operator of the quasi-public sector of the Republic of Kazakhstan, which in turn provides control procedures that minimize corruption risks as well as risks related to fraudulent actions by potential suppliers.

2. During the analysis period, no lawsuits from suppliers against the Company, nor any resolutions issued by law enforcement agencies that would serve as grounds for monitoring compliance with procurement rules for 2024, were received. No penalty sanctions were imposed. Furthermore, no complaints related to the Company’s procurement procedures were recorded via the ACCS hotline.