

## **Results of the internal analysis of corruption risks of Kazyna Capital Management JSC for 2018**

### **Name of the object of internal analysis of corruption risks:**

Kazyna Capital Management JSC (hereinafter referred to as the Company).

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

Order of the Chairman of the Management Board of the Company "On conducting an internal analysis of corruption risks" dated June 5, 2019 No. 08.

### **The period of internal analysis of corruption risks:**

2018.

Internal analysis of corruption risks was carried out in the following areas:

- 1) identification of corruption risks in internal regulatory documents affecting the Company's activities;
- 2) identification of corruption risks in the organizational and managerial activities of the Company.

In the period from June 6 to June 21, 2019, the working group on internal analysis of corruption risks in the Company's activities (hereinafter referred to as the working group) conducted an internal analysis of corruption risks in the Company's activities, the results of which are reflected herein.

Based on the results of an internal analysis of corruption risks in the Company's activities, no powers and provisions contributing to the commission of corruption offenses have been identified, the risk management system works, including in the field of risk management of fraud and/or corruption, the risk of fraud and/or corruption on the part of personnel and third parties is managed.

Based on the results of an internal analysis of corruption risks in the Company's activities, in accordance with paragraphs 20-23 of the Rules, it was **decided**:

1. To recommend to the Company's Legal and Corporate Affairs Service:
  - 1) by July 5, 2019, draw up a memo for the Company's officials regarding the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption" and send it to interested parties for familiarization;
  - 2) to send a letter to Baiterek Venture Fund Joint Stock Company and BV Management Limited Liability Partnership with a recommendation to conduct an internal analysis of corruption risks by July 25, 2019 (the deadline for sending a Report on the ongoing anti-corruption work to the authorized body of the Republic of Kazakhstan for combating corruption).
2. Submit an analytical report to the Chairman of the Management Board of the Company for consideration.
3. The results of the internal analysis of corruption risks should be posted on the Company's corporate website.