

# COMPLIANCE SERVICE

The Compliance Service is a structural unit of the Fund responsible for compliance with the anti-corruption legislation of the Republic of Kazakhstan. The Service ensures the definition of the anti-corruption policy, control over the implementation of anti-corruption measures, as well as the formation of an appropriate internal corporate culture.

The main objectives of the Compliance Service of the Fund are to ensure compliance with the anti-corruption legislation of the Republic of Kazakhstan and development of the compliance program, including coordination of activities and interaction with the compliance services of portfolio companies. The Compliance Service is guided by the Law of the Republic

of Kazakhstan "On Combating Corruption", the Anti-Corruption Policy, the Code of Conduct, the Corporate Standard on Compliance Function of the Fund's Group and other internal documents of the Fund.

In 2023, the Compliance Service continued to develop the compliance function in the Fund group of companies, to automate certain elements of the compliance program at the level of the Fund group of companies and to develop interaction with the regulator, increasing the transparency of the activities of the Fund group of companies.

The Fund's management carries out systematic work aimed at promoting the ideology

of integrity and strengthening public control in the corporate governance of the Fund group of companies. The Fund's management regularly holds meetings and conducts an open dialog with the business community, foreign investors, public representatives, industry associations, based on the principles of openness and transparency. Also, the Fund's management sets the right "tone from above", emphasizing the need to comply with legislation and compliance policies.

The Head of the Compliance Service of the Fund takes an active part in standard-setting work on the compliance function in the quasi-public and private sector, meetings with government agencies and the business community.

## AT THE END OF 2023, COMPLIANCE SERVICES HAS DONE THE FOLLOWING:

- ◆ Work on updating the Code of Conduct of the Fund was carried out, following the results of which a new version of the Code of Conduct of Samruk-Kazyna JSC was approved by the decision of the absentee meeting of the Board of Directors of the Fund dated June 20, 2023;
- ◆ The Strategy for Development of Compliance Function in the Fund group of companies for 2023-2027 was developed and approved by the decision of the absentee meeting of the Board of Directors of the Fund dated June 20, 2023. The strategic directions of compliance development for 2023-2027 in the framework of combating corruption and increasing transparency of activities of the Fund group of companies are defined as the development of the compliance function in accordance with the best international practices, including initiatives to automate individual elements of the compliance program, as well as certification of anti-corruption compliance systems for compliance with the requirements of ST RK ISO 37001:2017 "Anti-bribery management systems".

- ◆ The Corporate Standard on Compliance Function of Samruk-Kazyna JSC group was completely revised. The Corporate Standard on Compliance Function of Samruk-Kazyna JSC group, developed in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Fund based on the best practices in the field of anti-corruption compliance, business ethics and compliance, including relevant international standards, was approved in a new version by the decision of the Management Board of the Fund No. 60/23 dated December 21, 2023.

In the reporting period, the Compliance Service of the Fund assessed the existing anti-corruption processes for compliance with the requirements of ISO 37001 "Anti-Bribery Management Systems". Based on the results of the assessment, an Action Plan was developed for the subsequent certification of the Fund.

Within the framework of process automation, the Compliance Service of the Fund carried out the work on automation of the processes

of consideration of appeals received through the Hotline and third-party due diligence by developing an information system (hereinafter – e-Compliance). The main purpose of e-Compliance is to automate compliance processes in terms of full and comprehensive consideration of appeals received on the Hotline, verification of counterparties, including providing access to information on counterparties contained in state databases, determining the level of risk, formation of standard conclusions and storage of the results of verification through a single interface with access for all companies of the Fund's group. It is planned to systematically improve e-Compliance in terms of automation of declaration of conflicts of interest, acceptance of gifts and training.

In terms of training activities, in 2023, a set of events (forums, seminars, meetings) on strengthening anti-corruption culture, improving compliance function and corporate governance, with the participation of the Anti-Corruption Agency and representatives of the Fund's portfolio companies.