

№129-СЗ от 28.01.2026 Report on the measures taken to prevent corruption in the E-Finance Center joint-stock company for 2025

In 2025, the following anti-corruption measures were implemented at the E-Finance Center joint-stock company (hereinafter referred to as the Company):

- on January 16, 2025, the compliance manager of the Company signed and sent to the Chairman of the Company's Management Board the Report on the measures taken to prevent corruption in E-Finance Center joint-stock company for 2024, which was subsequently posted on the corporate website of the Company;

- The Company's Board of Directors reviewed the Report on the implementation of the Work Plan of the Compliance Manager of E-Finance Center JSC for 2024 and the Report on the activities performed by the Compliance Manager of E-Finance Center joint-stock company for the second half of 2024 (Minutes No.1 dated February 6, 2025);

- by the decision of the Company's Board of Directors dated February 6, 2025 (Minutes No.1), Amendments and Additions No.2 to the Regulation on the Compliance Manager of E-Finance Center joint-stock company were approved;

- in accordance with Order No. 45 of the Chairman of the Management Board of the Company dated February 12, 2025, "On Conducting an Internal Analysis of Corruption Risks in the Activities of the E-Finance Center joint-stock company" the working group conducted an internal analysis of corruption risks in the Company's activities for 2024;

- on March 3, 2025, an Analytical Report on the results of the internal analysis of corruption risks in the activities of the E-Finance Center joint-stock company was signed and subsequently published on the Company's corporate website;

- by Order No. 67 of the Chairman of the Management Board of the Company dated March 11, 2025, the Analysis of Internal and External Factors of the Anti-Corruption Management System of E-Finance Center joint-stock company was approved;

- by Order of the Chairman of the Management Board of the Company dated March 12, 2025, No. 68, the Action Plan for eliminating the causes and conditions contributing to the commission of corruption offenses identified as a result of the internal analysis of corruption risks in the activities of the E-Finance Center joint-stock company was approved;

- by the decision of the Board of the Company dated March 12, 2025 (Minutes No. 7), the Corruption Risk Register of E-Finance Center JSC for 2025 and the Goals of the Anti-Corruption Management System of E-Finance Center JSC for 2025 were approved;

- for the purpose of assessing the degree of improvement in the understanding of the anti-corruption compliance culture, in the first and third quarters of 2025, the Company's Compliance Service (hereinafter referred to as the CS) conducted anonymous surveys among the Company's employees. Based on the results of these surveys, recommendations to enhance the anti-corruption compliance culture within



the Company were submitted to the Chairman of the Management Board of the Company;
№ 129-СЗ от 28.01.2026

- during the period from March 18 to 20, as well as on September 17–19 and September 26, 2025, the CS conducted training sessions dedicated to the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the Company's anti-corruption management system;

- the CS, jointly with the Company's Department of Testing, Monitoring, and Incident Management, automated the processes for signing appendices to the internal regulatory documents of the Company's anti-corruption management system;

- on June 4, 2025, Order No. 119 "On Conducting an Internal Audit of the Anti-Corruption Management System in E-Finance Center joint-stock company for 2025" was approved by the Chairman of the Management Board of the Company;

- by Resolution of the Management Board of the Company dated June 23, 2025 (Minutes No. 19), the Report on the Internal Audit of the Anti-Corruption Management System in E-Finance Center joint-stock company was approved;

- on June 18, 2025, a meeting on the analysis (management review) of the anti-corruption management system by the Company's Management Board was organized and conducted by the Company's compliance manager;

- for the purpose of familiarizing newly hired employees of the Company with the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption" and the anti-corruption management system, the compliance manager ensured the participation of CS employees in four onboarding events;

- by Resolution of the Company's Board of Directors dated August 1, 2025 (Minutes No. 7), Amendments and Additions No. 3 to the Regulation on the Compliance Manager of E-Finance Center joint-stock company were approved;

- by Order No. 169 of the Chairman of the Management Board of the Company dated August 12, 2025, the Plan for the Implementation of Corrective Actions Based on the Results of the Internal Audit of the Anti-Corruption Management System in the E-Finance Center joint-stock company for 2025 was approved;

- information on the implementation of recommendations submitted following the internal analysis of corruption risks in the activities of E-Finance Center joint-stock company for the second half of 2024, as well as for the first half of 2025, was published on the Company's corporate website;

- the Company's compliance manager ensured the conduct of an analysis of the anti-corruption management system by the Company's Board of Directors (Minutes No. 8 dated September 3, 2025);

- The Board of Directors reviewed the Report on the Activities Performed by the Compliance Manager of E-Finance Center joint-stock company for the first half of 2025 (Minutes No. 8 dated September 3, 2025);

- based on the results of the second surveillance audit dated November 3, 2025, the international certification body CERT International decided to extend the validity of Certificate No. ABMS-1693/A, confirming that the Company's anti-corruption management system complies with the requirements of the international standard ISO 37001:2016;



Подписан в MetaDoc
Проверка по ссылке:
[\[Проверочная ссылка\]](#)

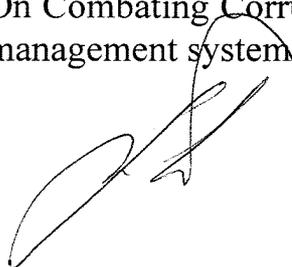
№129-СЗ от 28.01.2026 - by Resolution of the Board of Directors dated November 28, 2025 (Minutes No. 11), the Anti-Corruption Policy of E-Finance Center joint-stock company was approved in a new edition;

- the Company provided quarterly reports established by the Sole Shareholder of the Company within the framework of the implementation of standard basic direction No. 4 "Prevention and Combating Corruption" for 2025;

- The CS on a quarterly/monthly basis monitored the implementation of the Action Plan to eliminate the causes and conditions, contributing to the commission of corruption offenses identified based on the results of an internal analysis of corruption risks in the activities of the E-Finance Center joint-stock company, Plan for the implementation of corrective actions based on the results of the internal audit of the anti-corruption management system in the E-Finance Center joint-stock company, measures provided for in the Register of Corruption Risks of the E-Finance Center JSC for 2025 and the achievement of the Goals of the anti-corruption management system of the E-Finance Center JSC for 2025. Based on the results of monitoring, the relevant results were reviewed by the Management Board of the Company.

At the same time, during 2025, the CS regularly carried out work to ensure compliance with regulatory requirements, to apply international practice on anti-corruption issues, to ensure compliance with the basic principles of anti-corruption and the effective implementation of anti-corruption measures, in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" as well as to ensure the functioning of the anti-corruption management system of the Company.

Compliance Manager



Sh. Turash

