

Results of the internal analysis of corruption risks in the activities of Qazaqstan Investment Corporation JSC

Name of the object of internal analysis of corruption risks:

Activities of the Company's subsidiaries (BV Management LLP; Baiterek Venture Fund JSC; BGlobal Ventures Ltd PC).

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 August 21, 2024 No. 48-II.

Analyzed period: From January 1 to December 31, 2023.

Contractor: Anti-Corruption Compliance Service of Qazaqstan Investment Corporation JSC (hereinafter – ACCS).

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

- 1) identification of corruption risks in internal regulatory documents affecting the activities of the Company's subsidiaries;
- 2) identification of corruption risks in the organizational and managerial activities of the Company's subsidiaries;
- 3) verification of compliance of the Company's subsidiaries with the requirements of the anti-corruption legislation of the Republic of Kazakhstan.

As part of the internal analysis of corruption risks, the following activities were carried out:

- 1) verification of internal regulatory documents and the organizational structure of the Company's subsidiaries for compliance with the requirements of the legislation of the Republic of Kazakhstan in the field of anti-corruption;
- 2) analysis of purchases of goods, works and services in the Company's subsidiaries (for 2023) for compliance with the requirements of the legislation of the Republic of Kazakhstan in the field of anti-corruption;
- 3) analysis of the organizational structure and the list of employees of the Company's subsidiaries as of 01.01.2024;
- 4) verification of officials of the Company's subsidiaries (persons equated to persons authorized to perform state functions) for compliance with the requirements of the Anti-Corruption Law;
- 5) analysis of information within the framework of the participation of the Company's subsidiaries in court proceedings in 2023;
- 6) analysis of mass media and other publicly available data sources regarding the presence of negative information regarding the Company's subsidiaries.

Based on the results of the internal analysis of corruption risks, we inform you that there are no identified corruption risks within the framework of the analyzed processes. At the same time, in order to ensure transparency of the activities of the Company's subsidiaries and increase the level of compliance control, the ACCS developed recommendations aimed at introducing additional control procedures in organizational and managerial activities. The relevant recommendations have been communicated to the heads of the Company's subsidiaries, and their implementation will be monitored by the ACCS.