Brief analytical report

on the results of the internal analysis of corruption risks of

«Damu» Fund» JSC

Almaty 26.06.2024

Internal analysis of corruption risks in the activities of Damu Fund JSC (hereinafter - the Fund) was carried out in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption," Standard Rules for Conducting Internal Analysis of Corruption Risks, approved by Order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service and Anti-Corruption dated 19.10.2016 No. 12, Anti-Corporate Fraud and Corruption Policy of Damu Entrepreneurship Development Fund Joint-Stock Company, approved by the decision of the Fund's Management Board dated 29.03.2019 (Minutes No. 45/2019).

Internal analysis of corruption risks was carried out by the working group.

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

1. identification of corruption risks in regulatory legal acts and in internal documents of the Damu Fund;
2. identification of corruption risks in the organizational and management activities of the Damu Fund.

As part of the analysis, it should be taken into account that the Fund does not provide public services, does not perform authorization functions and does not perform control functions.

1. Identification of corruption risks in regulatory legal acts and internal documents of the Fund

No corruptive norms were identified in this area.

**2. Identification of corruption risks in the organizational and management activities of the Fund**

**2.1. As part of the analysis of internal documents, a norm potentially creating corruption risks was identified in terms of transferring an employee to a vacant position, including a higher position, without announcing a competitive selection process.**

In this case, according to subparagraph 9) of paragraph 24 of the Methodological Recommendations on the internal analysis of corruption risks from 30.12.2022 №488, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan on combating corruption (Anticorruption Service), in the direction of **personnel management** indicator of corruption risks is the promotion of employees, transfer to other positions *without competitive selection*.

* 1. Compliance with qualification requirements

During the check for the recruitment of persons who meet the qualification requirements on a selective basis, the personal files of a number of employees were checked.

The results of the inspection revealed that in a number of cases there were no documents confirming employment activity, information on the absence of a corruption offense committed by a person.

2.3. Managing conflicts of interest

In 2023, the Fund's structural units did not receive any requests from the Anti-Corruption Compliance Service on conflicts of interest.

2.4. Training on anti-corruption issues

For the purpose of formation of anti-corruption culture, explanation of legislative norms, requirements of internal documents through training events for employees of the Fund, JSC Damu Fund conducted training of employees on anti-corruption issues in accordance with the approved Anti-Corruption Compliance Program of the Fund for 2023.

* 1. Analysis of requests

In accordance with the measures of anti-corruption organization, Damu Fund JSC has introduced a Corruption Hotline. The hotline is a means of confidentially receiving signals about suspicions, violations and facts of corruption.

The Damu Fund JSC hotline consists of the following communication channels available for use by all employees of Damu Fund JSC, as well as for third parties wishing to provide information on suspicions and facts of corruption:

* to the email address: [senim@fund.kz](mailto:senim@fund.kz);
* to the helpline: +7(727) 244 82 71;
* to the postal address: AO5C9Y3, Republic of Kazakhstan, Almaty city, Gogol street, 111.

In 2023, Damu Fund JSC received 1 complaint. According to the results of the analysis, no corrupt or fraudulent actions on the part of the Fund's employees were revealed.

In 2023, no information on facts of corruption was received by the Hotline with regard to the employees of Damu Fund JSC.

*Based on the results of the analysis of the identified observations and the reasons for their occurrence, no corruption risks are identified.*

* 1. Organization and procurement of goods, works and services

In this area, the process is sufficiently regulated by internal documents that do not contradict the norms of the current legislation.

Annex No. 1 to the Analytical Report

Action plan

to eliminate the causes and conditions conducive to the commission of corruption offenses

identified as a result of an internal analysis of corruption risks in the Personnel Development Department

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| № r/s | Recommendations on the results of internal analysis of corruption risks | Action | Completion form | Responsible executives | Time of execution |
| 1 | Consider making changes/additions to the Fund's internal document providing for the transfer of an employee to a vacant position, including a higher position, through a competitive selection process. | Introduction of amendments/additions to the internal document of the Fund providing for the transfer of an employee to a vacant position, including a higher position, by announcing a competitive selection. | Decision of the Authorized Body on approval of amendments/additions to the Fund's internal document | Responsible unit of the Fund | December 2024 |
| 3 | Carry out activities to properly build personnel files on current employees. | Bring personal files of Damu Fund JSC employees in compliance with the requirements of Damu Fund JSC internal documents. | The act of audit of personal files, certified by the supervising official. | Responsible unit of the Fund | December 2024 |