Extract from the Protocol of the meeting of the Board of “Entrepreneurship Development Fund “Damu” JSC dated March 29, 2019 No. 45/2019

Question 9. On Approval of the Policy of Combating Corporate Fraud and Corruption of the joint-stock company “Entrepreneurship Development Fund “Damu” (speaker - Compliance Controller Kuanbayev K.O.)

In accordance with [paragraph 1 of Article 59](http://online.zakon.kz/Document/?doc_id=1039594#sub_id=590000) of the Law of the Republic of Kazakhstan dated May 13, 2003 No. 415 II "On Joint-stock companies," [subparagraph 2) of paragraph 82 of the](http://online.zakon.kz/Document/?doc_id=38530261#sub_id=8200) Charter of “Entrepreneurship Development Fund “Damu” JSC, the Board of “Entrepreneurship Development Fund “Damu” JSC **DECIDED:**

1. To approve [the Policy](#sub100) of combating corporate fraud and corruption of the joint-stock company "Entrepreneurship Development Fund" Damu, "according to Appendix No. 6 to this protocol.

2. To declare invalid [the Anti-Corruption Policy](http://online.zakon.kz/Document/?doc_id=35872607) of “Entrepreneurship Development Fund “Damu” Joint Stock Company, approved by the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC dated March 6, 2018, Protocol No. 24/2018.

3. Determine the business owner - compliance controller of “Entrepreneurship Development Fund “Damu” JSC.

4. The Compliance Controller shall develop an action plan for the implementation of the Corporate Fraud and Corruption Policy of “Entrepreneurship Development Fund “Damu” JSC by 01.05.2019.

Based on the results of voting, a positive decision was made.

"APPROVED"

by decision of the Board

of joint-stock company

“Entrepreneurship Development Fund “Damu”

dated March 29, 2019, Protocol No. 45/2019

Appendix No. 6

to [the Protocol of](#sub0) the meeting

of the Board

of joint-stock company

“Entrepreneurship

Development Fund “Damu”

dated "\_\_\_\_" \_\_\_\_\_\_\_ 2019

Protocol No. \_\_\_\_\_\_\_

Policy
of combating corporate fraud and corruption
of the joint-stock company “Entrepreneurship Development Fund “Damu”

(as [*amended*](http://online.zakon.kz/Document/?doc_id=32717947) as of 06.11.2020)

Almaty, 2019

Chapter 1. General Provisions

1. The policy of combating corporate fraud and corruption of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter - the Policy) was developed in accordance with the [Law](http://online.zakon.kz/Document/?doc_id=33478302) of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On Combating Corruption" (hereinafter - the Law), the current legislation of the Republic of Kazakhstan and internal documents of JSC "Entrepreneurship Development Fund "Damu" (hereinafter - the Fund).

2. When developing this Policy, the principles and norms in the field of combating corporate fraud and corruption contained in the documents listed in [Appendix No. 1](#sub1) to this Policy are also used.

3. The purpose of combating corporate fraud and corruption is to eliminate the causes and conditions that generate fraud and corruption in the activities of the Fund.

4. The goal of combating corporate fraud and corruption is achieved by solving the following tasks:

1) creation and implementation of mechanisms for the implementation of the basic principles of combating corporate fraud and corruption;

2) managing the risk of fraud and corruption in order to protect the business reputation of the Fund;

3) ensuring compliance by the Fund and its employees with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and applicable norms of foreign and international law.

5. The provisions of this Policy apply to all employees of the Fund, as well as in relation to dependent (controlled) organizations of the Fund.

The provisions of this Policy may apply to other legal entities and individuals with whom the Fund enters into contractual relations, while such conditions must be enshrined in contracts concluded by the Fund with them.

Paragraph 6 has been amended in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20 No. 98/2020 (see previous edition)

6. The following terms and definitions are used in the Policy:

1) **corporate fraud** - fraudulent actions involving an employee and contractors of the Fund, third parties for the purpose of theft of property or acquisition of the right to property of the Fund by deception or abuse of trust;

2) **fraudulent actions** - intentional actions or inaction of employees of the Fund, as well as other individuals and/or legal entities in order to benefit from the Fund and/or cause material and/or intangible damage;

3) **corruption offense** - illegal guilty act (action or inaction) having signs of corruption, for which the legislation of the Republic of Kazakhstan (hereinafter - RK) establishes administrative or criminal liability;

4) **corruption** - illegal use by an employee of the Fund of his official (official) powers and related opportunities in order to obtain or extract personally or through intermediaries property (non-property) benefits and advantages for himself or herself or third parties, as well as bribery of these persons by providing benefits and advantages;

5) **the risk of fraud and corruption** - the possibility of causes and conditions that contribute to the commission of fraudulent actions and corruption offenses;

6) **combating corporate fraud and corruption** - the activities of the Fund's employees within the limits of their powers to prevent fraud and corruption, including the formation of an anti-corruption culture in society, the identification and elimination of the causes and conditions that contribute to the commission of fraudulent actions and corruption offenses, as well as to identify, suppress, disclose and investigate fraudulent actions and corruption offenses, and eliminate their consequences;

7) **conflict of interest** - a contradiction between the personal interests of employees of the Fund and their official powers, in which the personal interests of these persons may lead to improper performance of their official powers;

8) **an official** - an employee of the Fund who constantly, temporarily or by special authority performs organizational, administrative or administrative functions in the Fund, as well as a person authorized to make decisions on the organization and conduct of procurement, or responsible for the selection and implementation of projects financed from the state budget and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit: Chairman and members of the Management Board, Managing Director, Chief Accountant, Head of the Staff of the Chairman of the Management Board, Director of the regional branch of the Fund and other employees of the Fund, determined in the manner prescribed by [paragraph 45](#sub4500) of this Policy;

9) **an employee** - an individual who is in labor relations with the Fund and directly performs work under an employment contract, as well as persons performing work in the Fund in accordance with civil law contracts (outstaffing);

10) **the authorized body for combating corruption** - the central executive body in the field of public service and anti-corruption, and its department, their territorial subdivisions that carry out within their powers the functions of implementing the anti-corruption policy of the Republic of Kazakhstan and coordinating in the field of combating corruption;

11) **Compliance Controller** - an employee who is in labor relations with the Fund and is responsible for the organization and functioning of the system of combating fraud and corruption;

12) **counterparty** - legal entities and individuals participating in state and own programs implemented by the Fund, supplier of goods, works or services, candidate for employment and other persons of interest to the Fund;

13) **third party** - legal entities and individuals that do not have business and other relations with the Fund.

Chapter 2. Basic principles of combating corporate fraud and corruption

7. Prevention of corporate fraud and corruption is carried out on the basis of the following principles:

1) legality;

2) priority of protection of the rights and legitimate interests of the Sole Shareholder, employees and counterparties of the Fund;

3) rejection of fraud and corruption in any forms and manifestations in the activities of the Fund;

4) the inevitability of punishment for the commission of fraudulent actions and corruption offenses;

5) application of systematic and comprehensive measures to prevent and combat corporate fraud and corruption.

8. The Fund adheres to the principle of complete rejection of corporate fraud and corruption in any forms and manifestations in the implementation of both main and other activities. In case of any manifestations of corporate fraud and/or corruption, regardless of the amount of damage caused, the Fund takes active measures to combat corporate fraud and corruption.

9. The Fund creates an organizational structure taking into account the compatibility of official duties and does not allow simultaneous assignment to the same employee of functions for the implementation of the process and monitoring/evaluation of the implementation of this process in order to minimize the possibility of committing and concealing conflicts of interest, corporate fraud and corruption.

10. The Fund identifies, assesses and periodically reassesses the risk of fraud and corruption. When identifying a risk, the Fund takes into account the completeness of the available information.

11. The Fund complies with due diligence in relation to its counterparties and third parties before deciding whether to commence or continue a business/employment relationship for its trustworthiness and the absence of a conflict of interest.

12. The Fund expects that each employee of the Fund, in the performance of his official duties, will put the interests of the Fund above his private interests and prevent situations that are regarded or may be regarded as a conflict of interest.

13. The Fund encourages employees of the Fund and other interested parties to report their suspicions about possible violations and cases of non-compliance with the provisions of this Policy, as well as to propose measures to improve the system of prevention and counteraction of corporate fraud and involvement in corruption activities.

14. The Fund reserves the right to disclose information about persons who have violated the requirements of the applicable legislation and this Policy, in the manner and on the terms established by the current legislation.

Chapter 3. Types of corporate fraud and corruption offenses

15. Corporate fraud, which the Fund may encounter in its activities, may be: internal, which are carried out by employees of the Fund, and external, the participants of which are counterparties of the Fund and third parties.

16. Corporate fraud is classified into the following types:

1) distortion of financial statements and non-financial indicators - intentional misstatement and/or omission of indicators established by legislative acts, principles and rules, standards for the formation of financial statements and disclosure of financial statements to mislead internal and external users of information in order to obtain economic and/or other benefits for themselves and/or third parties;

2) illegal use/appropriation/theft of assets - theft and misuse of funds, fixed assets and inventory of the Fund;

3) corruption offenses - illegal acts/inaction of employees and contractors of the Fund, associated with corruption or creating conditions for corruption such as abuse of official powers and abuse of official powers, giving and receiving bribes, mediation in bribery, official forgery, commercial bribery in order to extract benefits and advantages for themselves or other persons or organizations or harm other persons or organizations.

17. The main factors affecting the emergence of corporate fraud and corruption in the Fund are:

1) inefficient organizational structure and personnel policy;

2) low corporate culture among employees;

3) poor-quality regulatory framework and non-compliance of internal documents with applicable legislation and [the Code](http://online.zakon.kz/Document/?doc_id=36487346) of Business Ethics of the Fund;

4) motivation of employees, based mainly on the achievement of financial results;

5) non-transparency of provided services, procurement processes and sale of the Fund's property;

6) ineffectiveness of the internal control system;

7) low level of communication with/between employees;

8) insufficient provision of resources for compliance control functions and the Security Service.

18. The main areas exposed to the risk of fraud and corruption in the activities of the Fund are:

- implementation of programs for financial support of small and medium-sized businesses;

- selection and recruitment of personnel;

- procurement of goods/works/services or sale of the Fund's property.

Chapter 4. Fraud and Corruption Risk Management

19. Fraud and corruption risk management consists of the following stages:

- monitoring the risk of fraud and corruption;

- identification (identification) of fraud and corruption risk;

- analysis and assessment of fraud and corruption risk;

- development of measures to eliminate the risk of fraud and corruption.

20. *Monitoring the risk of fraud and corruption* is aimed at identifying, analyzing and assessing this type of risk in the activities of the Fund, i.e. the conditions and factors that contribute to fraudulent actions and corruption by employees of the Fund, and should serve as a source of appropriate measures. Monitoring of fraud and corruption risk includes the following areas:

-Analysis of certain areas of the Fund's activities that bear risks of fraud and corruption, including also the examination of internal documents of the Fund;

- control over compliance by employees of the Fund with the provisions of this Policy, anti-corruption standards and restrictions;

- analysis of appeals of employees and contractors of the Fund, third parties to identify facts of fraud and corruption in the activities of the Fund;

- analysis of mass media, etc.

21. *Identification (identification) of fraud and corruption risks* consists in determining the Fund's exposure to the effects of these types of risks that can cause fraudulent and corrupt manifestations. Identified events and risks of fraud and corruption are systematized in the form of a register of compliance risks and supplemented by appropriate measures (measures) aimed at their prevention/reduction.

22. *Analysis and assessment of fraud and corruption risks*. The Fund carries out identification, assessment (self-assessment) and periodic reassessment of fraud and corruption risks characteristic of its potentially vulnerable business processes. When identifying and assessing risks, the Fund takes into account the completeness of information on the activities and plans of the Fund, including investment and strategic, available at the time of assessment and revaluation.

23. *Development of measures to eliminate the risks of fraud and corruption*. At this stage, for each risk of fraud and corruption, the measures necessary to reduce the likelihood of risk and its consequences are determined.

24. The level of fraud and corruption risks is carried out taking into account the degree of probability of their occurrence and the degree of impact on the activities of the Fund (materiality):

|  |  |
| --- | --- |
| High | Types of fraudulent actions and corruption offenses for which criminal liability is provided:- misappropriation or embezzlement, i.e. theft of entrusted property;- fraud, that is, theft of someone else's property or acquisition of the right to someone else's property by deception or abuse of trust;- performing actions to issue an invoice without actual performance of works, provision of services, shipment of goods;- Legalization (laundering) of money and (or) other property obtained by criminal means;- illegal acquisition of ownership of an interest in a legal entity (raiding);- Abuse of official powers by an official contrary to the interests of the service in order to extract benefits and advantages for himself or herself or other persons or organizations or to harm other persons or organizations, if this entailed causing significant harm to the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state;- abuse of power or official powers, that is, the commission by an official of actions that clearly exceed his rights and powers and entailed causing significant harm to the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state;- illegal participation in entrepreneurial activities - establishment by an official, organization carrying out entrepreneurial activities, or participation in the management of such an organization personally or through a trustee, contrary to the prohibition established by law, if this act is related to the provision of such an organization benefits and advantages or other form of patronage;- Restriction of the rights and legitimate interests of an individual entrepreneur or commercial organization, regardless of the organizational and legal form or form of ownership, as well as restriction of independence or other illegal interference in the activities of an individual entrepreneur or commercial organization using his official powers contrary to the interests of the service in order to extract benefits and advantages for himself or herself or other persons or organizations or harm other persons or organizations, if it caused significant harm \* to the rights and legitimate interests of citizens or organizations or to the legally protected interests of society or the state;- receiving a bribe by an official personally or through an intermediary in the form of money, securities, other property, right to property or property benefits for himself or other persons for actions (inaction) in favor of the bribe giver or persons represented by him, if such actions (inaction) falls within the official powers of this person, or by virtue of his official position he may contribute to such actions (inaction), as well as for general patronage or connivance;- giving a bribe to an official of the Fund, a foreign state or an international organization in person or through an intermediary;- mediation in bribery, that is, assisting the bribe-taker and the bribe-taker in reaching or implementing an agreement between them on receiving and giving a bribe;- official forgery, that is, the introduction by an official into official documents of knowingly false information or the introduction of corrections into these documents that distort their actual content, or the issuance of knowingly false or fake documents, if these acts were committed in order to extract benefits and advantages for himself or herself or other persons or organizations or harm other persons or organizations;- inaction in the service, that is, failure of an official to perform his official duties in order to extract benefits and advantages for himself or herself or other persons or organizations or to harm other persons or organizations, if this entailed a significant violation of the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state:- negligence, that is, failure to perform or improper performance by an official of his duties due to unfair or negligent attitude to the service, if this entailed causing significant harm to the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state. |
| Average | Types of fraudulent actions and corruption offenses for which administrative liability is provided, if these actions do not contain signs of a criminal offence:- provision by individuals to officials of illegal material remuneration, gifts, benefits or services;- receipt by an official personally or through an intermediary of illegal material remuneration, gifts, benefits or services for actions (inaction) in favor of the persons who provided them, if such actions (inaction) are within the official powers of the person;- provision by legal entities to officials of illegal material remuneration, gifts, benefits or services;- hiring persons who have previously committed a corruption crime. |
| Low | Violation of the provisions of this Policy, anti-corruption standards and restrictions that did not entail significant harm to other persons or organizations or the legally protected interests of a company or state for which administrative and criminal liability is not provided. |

Significant *harm* - violation of the constitutional rights and freedoms of man and citizen, the rights and legitimate interests of organizations, the legally protected interests of society and the state; causing significant damage; the occurrence of a difficult life situation for the injured person; disruption of the normal operation of organizations or state bodies; other consequences indicating the materiality of the damage caused

25. The risk of high and medium-level fraud and corruption is recognized by the Fund as material, upon the occurrence of which, and (or) insufficiency of approved measures, a plan of measures to eliminate/reduce, control risks is developed, and if they cannot be eliminated, methods and methods of control and effective management of them are determined. The risk of low-level fraud and corruption is controlled by the heads of structural divisions of the Fund.

26. The Compliance Controller provides quarterly information to the Management Board, the Audit Committee of the Board of Directors and the Board of Directors of the Fund on the status of the system for combating corporate fraud and corruption as part of the report on the activities of the Compliance Controller.

Chapter 5. Main measures to prevent and combat corporate fraud and corruption

27. Measures to combat corporate fraud and corruption include:

1) carrying out preventive, information and explanatory work on compliance with the requirements of applicable anti-corruption legislation and internal documents of the Fund, as well as on the prevention and counteraction of fraud and corruption;

2) timely forecasting and minimization of risks of involving employees in fraudulent and/or corrupt activities;

3) prevention, detection and suppression of any forms and manifestations of fraud and corruption;

4) elimination of consequences and/or attempts to implement fraudulent and corrupt actions;

5) development, implementation and application of internal documents, organizational measures and procedures to prevent and combat fraud and corruption;

6) carrying out preventive activities aimed at preventing the occurrence of negative processes in the team and preventing the commission of illegal actions by employees;

7) carrying out verification measures in relation to candidates when hiring and identifying potential conflicts of interest among employed persons, when appointing employees to positions related to corruption risk, early/timely resolution thereof;

8) control over compliance by employees of the Fund with the restrictions, prohibitions and obligations established by the anti-corruption legislation of the Republic of Kazakhstan and this Policy;

9) examination of the adopted internal and organizational and administrative documents for the absence of provisions in them that create prerequisites for involvement in fraudulent or corrupt actions, and reflection in them, if necessary, of appropriate preventive measures;

10) conducting a comprehensive check of the Fund's counterparties and third parties for their affiliation with the Fund's employees and involvement in corruption offenses before establishing business relations;

11) current monitoring of business processes, analysis of potential vulnerabilities, preparation of recommendations and proposals for the organization and adoption of adequate measures minimizing the risks of fraud and corruption;

12) carrying out practical interaction with law enforcement agencies of the Republic of Kazakhstan in order to coordinate its activities to combat fraud and corruption, prevent and prevent offenses;

13) conducting regular external and internal audits of the effectiveness of the internal control system, in particular, the accounting and management accounting system, as well as monitoring compliance by structural units with the requirements of legislation, international standards and internal documents of the Fund;

14) organization of communication channels ("hotlines," special e-mail, etc.) to receive information from employees of the Fund and representatives of counterparties about signs of fraudulent actions and corruption;

15) encouragement of persons who reported on the fact of corporate fraud and corruption offense or otherwise assist in combating fraud and corruption, carried out in the form of monetary remuneration, certificate or declaration of gratitude;

16) inclusion of an anti-corruption clause in procurement agreements and property sale agreements concluded by the Fund, the approximate text of which is given in [Appendix 2](#sub2) to this Policy;

17) conducting internal audits on possible cases of corporate fraud and corruption.

28. Internal documents (procedures) of the Fund in the field of combating corporate fraud and corruption, an action plan to eliminate/reduce and control risks of fraud and corruption may apply additional measures.

29. In accordance with the norms of the Law, the Fund, as a subject of combating corruption, applies the following measures to combat corruption:

1) anti-corruption monitoring;

2) regular assessment (self-assessment) and analysis of corruption risks;

3) approval and compliance with [anti-corruption standards](http://online.zakon.kz/Document/?doc_id=33478302#sub_id=100000);

4) establishment of anti-corruption restrictions for employees of the Fund;

5) prevention and resolution of conflicts of interest;

6) submission of reports to the authorized body for combating corruption on the work done to combat corruption in the Fund.

Chapter 6. Application of measures to combat corporate fraud and corruption

30. Measures to combat corporate fraud are applied in proportion to the identified risks in accordance with [Chapter 5](#sub2700) of this Policy and other internal documents (procedures) of the Fund.

31. The Fund carries out measures to prevent and combat corruption in accordance with the norms of anti-corruption legislation of the Republic of Kazakhstan with the application of international standards.

32. Anti-corruption monitoring in the Fund is carried out in order to assess law enforcement practice in the field of combating corruption by collecting, processing, summarizing, analyzing and evaluating information related to anti-corruption policy, the state and analysis of information related to the effectiveness of measures taken by the Anti-Corruption Fund.

Anti-corruption monitoring is carried out by the Compliance Controller quarterly by studying publications in the mass media, reports of the Internal Audit Service of the Fund and appeals of individuals and legal entities on anti-corruption issues. The results of anti-corruption monitoring can be the basis for analyzing corruption risks.

33. Analysis (internal and external) of corruption risks of the Fund (hereinafter referred to as the Analysis) is carried out on the basis of the results of anti-corruption monitoring in order to identify and study the causes that contribute to the commission of corruption offenses.

External analysis of corruption risks is carried out by the authorized body for combating corruption in accordance with the procedure established by the current legislation of the Republic of Kazakhstan.

Internal analysis of corruption risks is carried out by the Compliance Controller or a specially created working group according to the order of the Chairman of the Board of the Fund on the basis of a memo from the Compliance Controller justifying the need for Analysis in the following areas:

1) identification of corruption risks in the legislation and internal documents of the Fund;

2) identification of corruption risks in the activities of the Fund for personnel management, settlement of conflicts of interest, provision of public services, implementation of state programs and other issues arising from organizational and management activities.

Paragraph 34 has been amended in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 13.09.19 No. 124/2019 (see previous edition)

34. In order to prevent corruption, the Fund has developed Anti-Corruption Standards aimed at strict compliance with the established rules and preventing corruption, in accordance with [Appendix No. 3](#sub3) to this Policy.

Employees of the Fund are obliged to familiarize themselves with and comply with the Anti-Corruption Standards. Employees of the Fund shall be liable for non-fulfillment or improper fulfillment of Anti-Corruption Standards in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Fund. Control over compliance with the Anti-Corruption Standards is assigned to the heads of the relevant structural divisions of the Fund.

35. In order to prevent or detect the facts of corruption offenses and fraud, employees and counterparties of the Fund, third parties may inform by any of the following communication channels that ensure confidentiality:

1) "Feedback" by filling out the form on the Internet resource of the [https://damu.kz/feedback/ Fund](https://damu.kz/feedback/);

2) to the e-mail address: senim@fund.kz;

3) to helplines: **+7 (727) 244 82 71** or single call center **1408**;

4) to the postal address: AO5C9Y3, Republic of Kazakhstan, Almaty, Gogol street, 111.

Paragraph 36 is set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 13.09.19 No. 124/2019 (see previous edition)

36. In order to form the Anti-Corruption Culture Fund for employees, the Compliance Controller, together with the Security Service, implements the Program for training and training of employees on combating corporate fraud and corruption ([Appendix No. 5](#sub5) to the Policy).

Chapter 7. Anti-corruption restrictions

Paragraph 37 has been amended in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20 No. 98/2020 (see previous edition)

37. In order to prevent the officials of the Fund from committing actions that may lead to the use of their powers in personal, group and other non-service interests, these persons undertake anti-corruption restrictions on:

1) carrying out activities incompatible with the performance of functional duties in the Fund;

2) inadmissibility of joint service (work) of close relatives, spouses and relatives;

3) use of official and other information that is not subject to official distribution in order to obtain or extract property and non-property benefits and advantages;

4) acceptance of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions (inaction) are within the official powers of the persons, or these persons, by virtue of their official position, may contribute to such actions (inaction).

The consent of the officials of the Fund to familiarize themselves with the provisions of this Policy and to accept anti-corruption restrictions shall be fixed by the personnel development unit of the Fund before taking office in the form in accordance with [Appendix 4](#sub4) to this Policy.

Non-acceptance of anti-corruption restrictions by officials of the Fund, entails refusal to accept for office or dismissal from office, their non-compliance in cases of absence of signs of a criminal act and administrative offense is the basis for termination of powers.

The policy was supplemented by paragraph 37-1 in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the Meeting of 06.11.20 No. 98/2020

37-1. Members of the family of an official of the Fund shall not be entitled to receive material remuneration, gifts or services provided for the actions (inaction) of this person in favor of persons who provided material remuneration, gifts or services, if such actions (inaction) are within the official powers of this person or by virtue of his official position may contribute to such actions (inaction).

Note: family members of an official of the Fund are understood as his spouse, parents, children, including adults, and persons who are dependent and permanently residing with him. "

The policy was supplemented by paragraph 37-2 in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the Meeting of 06.11.20 No. 98/2020

37-2. Members of the family of an official of the Fund are not entitled to receive material remuneration, gifts or services, 37-2. Money received on the account of officials of the Fund and (or) members of their families without their knowledge, as well as funds received by them in violation of [subparagraph 4) of paragraph 37](#sub3700) and [paragraph 37-1 of Chapter 7](#sub370100) of the Policy, no more than two weeks after their discovery shall be transferred to the republican budget with an explanation to the relevant body of state revenues on the circumstances of receipt of such funds.

Gifts received without the knowledge of the officials of the Fund and (or) members of their families, as well as received by them in violation of subparagraph 4) of paragraph 37 and paragraph 37-1 of Chapter 7 of the Policy, are subject to gratuitous transfer to the authorized body for state property management within seven calendar days from the date of receipt of the gift or from the date, when the official of the Fund became aware of the receipt of the gift, and the services rendered to these persons under the same circumstances must be paid by transferring money to the republican budget within seven calendar days from the date of provision of the service or from the day when the official of the Fund became aware of the provision of the service.

An official of the Fund, who transferred the gift to the authorized body for state property management, has the right, with the notification of a higher official, to redeem it at the value determined in accordance with the [Law](http://online.zakon.kz/Document/?doc_id=33693545) of the Republic of Kazakhstan "On Valuation Activities in the Republic of Kazakhstan," on the basis of a purchase and sale agreement concluded with the authorized body for state property management. The proceeds from the sale of gifts are transferred to the republican budget.

Officials are obliged to inform the Compliance Controller about the facts of receiving gifts within two working days from the date of receipt.

38. Officials of the Fund are prohibited from:

1) independently participate in the management of an economic entity, if the management or participation in the management of an economic entity is not included in their official duties in accordance with the laws of the Republic of Kazakhstan, contribute to the satisfaction of the material interests of organizations or individuals by illegally using their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activities, except for the acquisition and (or) sale of shares of open and interval mutual investment funds, bonds on the organized securities market, shares of commercial organizations (common shares in an amount not exceeding five percent of the total number of voting shares of organizations) on the organized securities market;

3) engage in other paid activities, except for pedagogical, scientific and other creative activities.

39. Officials of the Fund have the right to rent (lease) a dwelling belonging to them on the right of ownership and receive income from such delivery.

40. Officials of the Fund, within thirty (30) calendar days from the date of taking office, are obliged to transfer to trust management for the period of performance of these functions in the manner, established by the laws of the Republic of Kazakhstan, property belonging to them, the use of which entails the receipt of income, except for money, bonds, units of open and interval mutual investment funds, legally owned by these persons, as well as property transferred to property lease.

41. The contract for trust management of property is subject to notarial certification.

42. In case of acquisition of shares, the officials of the Fund are obliged to transfer them to trust management within thirty calendar days from the date of acquisition in accordance with the procedure established by the laws of the Republic of Kazakhstan. Officials - members of the executive body of the Fund are obliged to submit to the personnel development unit of the Fund a copy of the notarized contract for trust management of property within ten working days after notarization of the contract.

43. Failure by officials of the Fund to fulfill the obligation provided for in paragraph 41 of this Policy is the basis for termination of their respective powers.

Paragraph 44 has been amended in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20 No. 98/2020 (see previous edition)

44. Officials of the Fund may not hold positions that are directly subordinate to positions held by their close relatives, spouse and/or relatives, as well as have close relatives, spouse and/or relatives directly subordinate.

Officials of the Fund who violate the requirements of this paragraph of the Policy, if they voluntarily do not eliminate it within one month from the date of detection of the said violation, are subject to transfer to positions excluding such subordination, and if such transfer is impossible, one of these employees is subject to dismissal from office or other release from the specified functions.

Close relatives are understood as parents (parent), children, adoptive parents (adopters), adopted (adopted), full-blood and half-blood brothers and sisters, grandfather, grandmother, grandchildren, relatives - brothers, sisters, parents and children of a spouse (wife).

The policy was supplemented with paragraph 44-1 in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the Meeting of 06.11.20 No. 98/2020

44-1. Persons who are candidates for a position in the Fund are obliged to notify the management of the Fund in writing about close relatives, spouse and (or) relatives working in this organization.

45. The list of officials performing organizational, administrative or administrative functions in the Fund and which are subject to the provisions of the [Law](http://online.zakon.kz/Document/?doc_id=33478302) of the Republic of Kazakhstan "On Combating Corruption" is established by order of the Chairman of the Board. The list of officials and changes/additions to it shall be prepared by the Personnel Development Division and sent for approval to the Compliance Inspector and the Security Service of the Fund.

46. A person who is a candidate for the position specified in the List and spouse shall submit to the state revenue body at the place of residence:

declaration on income and property subject to taxation, including those located outside the territory of the Republic of Kazakhstan, indicating the location of the said property;

information on deposits in banking institutions and securities, including outside the territory of the Republic of Kazakhstan, indicating the banking institution, as well as financial means that these persons have the right to dispose of personally or jointly with other persons;

information on its participation as a shareholder or founder (participant) of legal entities, indicating the share of participation in the authorized capital and full bank or other details of these organizations;

Details of the trusts and the States in which they are registered, with the relevant bank account numbers if the person or his spouse is the beneficiary of the trusts;

information on the names and details of other organizations that have contractual relations, agreements and obligations with the person (including oral ones) for the maintenance or temporary storage of material and financial resources belonging to the person or spouse in an amount exceeding the thousandth size of the monthly calculation index.

These persons provide the Fund with a certificate from the tax authority on receipt of declarations and information specified in this paragraph of the Policy.

47. Officials of the Fund are prohibited from concluding civil law transactions not under their own name - on dummy persons, anonymously, under a pseudonym and others. These transactions are recognized as invalid in accordance with the procedure established by the Law.

48. Officials of the Fund are prohibited from performing official duties if there is a conflict of interest. Officials of the Fund should take measures to prevent and resolve conflicts of interest. Officials of the Fund are obliged to notify the immediate supervisor in writing of the conflict of interest that has arisen or the possibility of its occurrence as soon as they become aware of it.

The Chairman of the Board of Directors or the Chairman of the Board of the Fund upon appeals from officials or upon receipt of information from other sources are obliged to take the following measures in a timely manner to prevent and resolve conflicts of interest:

1) remove officials who have identified a conflict of interest from the performance of official duties and entrust another person with the performance of official duties on the issue in connection with which a conflict of interest has arisen or may arise;

2) change the duties;

3) take other measures to eliminate the conflict of interest.

Chapter 8. Gifts, Charity and Sponsorship

49. A gift is any value in tangible or intangible form for which there is no obligation to pay the usual price, including money, securities and other property, benefits and services of a property nature (works, services, payment for entertainment, recreation, transportation costs, loans, discounts, provision for use of property, including housing, charitable contributions, donation, etc.) received or transferred by an employee of the Fund using official powers.

50. Gifts to family members, close relatives or other close persons of an employee of the Fund, transferred in connection with the commission by such employee of any actions (inaction) related to his work in the Fund, for the purposes of this Policy are considered gifts to the employee.

Paragraph 51 has been amended in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 13.09.19 No. 124/2019 (see previous edition); set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20 No. 98/2020 (see previous edition)

51. It is prohibited to give gifts to employees of the Fund and members of their families for actions (inaction) in favor of the donor, if such actions (inaction) fall within the official powers of these persons or these persons, by virtue of their official position, may contribute to such actions (inaction).

Paragraph 52 is set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20, No. 98/2020 (see previous edition)

52. The prohibition on accepting gifts established by this Policy does not apply to the employee's relationship with the giver, based on an obvious personal relationship (gifts of parents, children, spouses) and a common reason for the exchange of gifts between employees of the Fund (birthdays, personal significant events, donations related to the death of close relatives), as well as in cases where such a gift is a corporate souvenir product: pens, notepads, diaries, etc.

Paragraph 53 is set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20, No. 98/2020 (see previous edition)

53. Any gifts must be rejected/returned to the donor in compliance with the ethics of business relations, if they do not meet the criteria specified in [paragraphs 51 and 52](#sub5100) of this Policy.

54. If there are doubts about the admissibility of the gift or other issues related to the procedure for handling gifts, the employee must contact the Compliance Inspector for clarification.

55. Excluded in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20 No. 98/2020 (see previous edition)

56. The Fund shall not provide charitable and sponsorship assistance for the direct or indirect purpose of influencing the decision-making by officials of counterparties or other persons affecting the activities of the Fund, or if such assistance can be perceived as an attempt to have such an impact.

Chapter 9. Reporting to the authorized anti-corruption body

57. The Fund submits a Report on the ongoing anti-corruption work to the authorized anti-corruption body twice a year:

1) according to the results of the half-year - no later than the 25th day of the month following the reporting period;

2) at the end of the year - no later than the 25th day of the month following the reporting year.

58. The Security Service shall prepare a Report which shall contain:

1) information on the state and ongoing work in the field of anti-corruption;

2) results of internal analysis of corruption risks;

3) information on the execution or non-fulfillment (indicating the reasons for non-fulfillment) of the plans of the Fund on the issue of combating corruption.

59. The report is signed by the Chairman of the Board of the Fund (or a person authorized by him), who ensures the accuracy and completeness of the information, and the timeliness of their submission.

Chapter 10. Final provisions

60. Employees of the Fund, regardless of their position, for committing fraudulent acts and corruption offenses shall bear criminal, administrative, civil and disciplinary liability in accordance with the laws of the Republic of Kazakhstan.

61. Employees of the Fund to whom criminal, administrative or disciplinary liability measures have been applied for committing fraudulent acts and corruption offenses are not exempted from liability for compensation of material damage to the Fund.

62. Employees and structural subdivisions of the Fund shall be responsible for compliance with the Policy requirements within their competence.

Paragraph 63 is set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20, No. 98/2020 (see previous edition)

63. Officials and employees of the Fund from the date of adoption of the Policy, and newly adopted from the moment of commencement of official and (or) labor duties in the Fund are obliged to confirm in the form provided for in [Appendix No. 4](#sub4) to the Policy that they agree to accept anti-corruption restrictions and/or studied, understood and undertake to follow the Policy in good faith.

64. Other, not provided for by this Policy is regulated by the legislation of the Republic of Kazakhstan. In the presence of contradictions of this Policy, the norms of the legislation of the Republic of Kazakhstan are subject to application of the norms of the legislation of the Republic of Kazakhstan.

65. This Policy comes into force from the date of its approval by the decision of the Board of the Fund.

**Appendix No. 1**

to the Corporate Anti-Corruption [Policy](#sub100)

of fraud and corruption

“Entrepreneurship Development Fund “Damu” JSC

Legal and methodological basis of the Policy

1. The United Nations [Convention](http://online.zakon.kz/Document/?doc_id=30040863) against Corruption (adopted in New York 31.10.2003 Resolution 58/4 at the 51st plenary meeting of the 58th session of the UN General Assembly), ratified by the Law of the Republic of Kazakhstan of May 4, 2008 No. 31-IV).

2. [Code](http://online.zakon.kz/Document/?doc_id=31577399) of the Republic of Kazakhstan on Administrative Offenses of 05.07.2014 No. 235-V of the Air Defense System.

3. [Labor Code](http://online.zakon.kz/Document/?doc_id=38910832) of the Republic of Kazakhstan No. 414-V of November 23, 2015.

4. [Criminal Code](http://online.zakon.kz/Document/?doc_id=31575252) of the Republic of Kazakhstan No. 226-V of July 3, 2014.

5. [Law](http://online.zakon.kz/Document/?doc_id=33478302) of the Republic of Kazakhstan dated November 18, 2015 No. 410-V of the air defense system "On Combating Corruption."

6. [Law](http://online.zakon.kz/Document/?doc_id=30466908) of the Republic of Kazakhstan dated August 28, 2009 No. 191-IV of the Air Defense System "On Combating the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism."

7. [Regulatory decision of the](http://online.zakon.kz/Document/?doc_id=32988867) Supreme Court of the Republic of Kazakhstan of November 27, 2015 No. 8 "On the practice of considering certain corruption crimes."

8. [Decree](http://online.zakon.kz/Document/?doc_id=36920298) of the President of the Republic of Kazakhstan dated December 29, 2015 No. 154 "On Approval of the Rules for the Preparation, Submission of the National Report on Combating Corruption to the President of the Republic of Kazakhstan and its Publication."

9. [Law](http://online.zakon.kz/Document/?doc_id=39415981) of the Republic of Kazakhstan on November 16, 2015 No. 401-V of the air defense system "On Access to Information."

10. [Rules](http://online.zakon.kz/Document/?doc_id=32328293#sub_id=100) of encouragement of persons who reported the fact of corruption offense or otherwise assist in combating corruption, approved by the Government of the Republic of Kazakhstan of December 30, 2015 No. 1131.

11. [Order](http://online.zakon.kz/Document/?doc_id=1032271) of the Government of the Republic of Kazakhstan of July 26, 2002 No. 833 "Some issues of accounting, storage, evaluation and further use of property converted (received) into the ownership of the state on certain grounds."

12. [Rules](http://online.zakon.kz/Document/?doc_id=35626007#sub_id=100) for conducting anti-corruption monitoring, approved by Order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service and Anti-Corruption dated October 19, 2016 No. 13.

13. [Decree](http://online.zakon.kz/Document/?doc_id=34598684) of the Government of the Republic of Kazakhstan of December 4, 2017 No. 806 "On Approval of the Rules for the External Analysis of Corruption Risks."

14. [Order](http://online.zakon.kz/Document/?doc_id=32274843) of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service and Anti-Corruption dated October 19, 2016 No. 12 "On Approval of the Model Rules for the Internal Analysis of Corruption Risks."

15. [Methodological recommendations](http://online.zakon.kz/Document/?doc_id=37505613) on the development of anti-corruption standards of the Agency for Public Service Affairs of the Republic of Kazakhstan and Anti-Corruption, 2016.

16. [Methodological manual](http://online.zakon.kz/Document/?doc_id=34978142) on conflict of interest issues in the public service of the Republic of Kazakhstan of the Ministry of Public Service Affairs of the Republic of Kazakhstan, 2016.

17. [The Code](http://online.zakon.kz/Document/?doc_id=36487346) of Business Ethics of “Entrepreneurship Development Fund “Damu” JSC, approved by the decision of the Board of Directors of “Entrepreneurship Development Fund “Damu” JSC dated July 25, 2011, Protocol No. 28.

18. Corporate Governance [Code](http://online.zakon.kz/Document/?doc_id=33914716) of “Entrepreneurship Development Fund “Damu” JSC, approved by the Board of “National Management Holding “Baiterek” Joint Stock Company dated December 27, 2017, Protocol No. 53/17.

19. Compliance risk management [policy](http://online.zakon.kz/Document/?doc_id=36775740) of “Entrepreneurship Development Fund “Damu” JSC approved by the decision of the Board of Directors of “Entrepreneurship Development Fund “Damu” JSC dated September 24, 2018, Protocol No. 10/2018

20. International standards ISO 37001:2016 "Anti-corruption management systems - requirements and recommendations for application."

21. "Recognition and prevention of commercial fraud," prepared by the United Nations Commission on International Trade Law (UNCITRAL), 2013.

22. "Anti-Corruption Ethics and Anti-Corruption Compliance Programme for Business Enterprises," a practical guide prepared by the United Nations Office on Drugs and Crime, 2013.

23. The UK Bribery Act 2010, approved by the Parliament of Great Britain and Queen Elizabeth II on 08.04.2010. and effective 01.07.2011.

24. FCPA (Foreign Corrupt Practices Act 1977).

**Appendix No. 2**

to the Corporate Anti-Corruption [Policy](#sub100)

of fraud and corruption

“Entrepreneurship Development Fund “Damu” JSC

Anti-corruption clause

1. The Parties to the Agreement, their affiliated (interrelated) persons, employees and intermediaries shall not have the right either directly or indirectly to offer and pay money and other values to employees and representatives of the other party in order to influence their actions and decisions under the Agreement or to obtain other illegal advantages in connection with its execution.

2. For the execution of the contract, it is not allowed to carry out actions qualified as giving/receiving a bribe, commercial bribery, abuse of official position, as well as actions that violate the requirements of the anti-corruption legislation of the Republic of Kazakhstan, both in relations between the parties to the contract, and in relations with third parties and state bodies.

3. If the party to the contract has real grounds to believe that a possible violation of these requirements, it must notify the other party in writing, up to the issue of suspending the performance of contractual obligations until the situation is resolved.

4. If the risk of fraud and corruption is identified under the contract, the relevant party must, within 10 days from the date of receipt of the notification, inform the other party about the measures taken to eliminate these risks with the appropriate confirmations attached.

5. In case of detection of a corruption offense committed in connection with the execution of the contract, the injured party has the right to unilaterally completely or in the appropriate part refuse to perform the contract, which entails its automatic full or partial termination from the moment the other party receives a notice of this.

The affected party also has the right to demand compensation in full for all losses caused to it (real damage and lost profit) caused by unilateral termination of the contract due to the fault of the other party.

**Appendix No. 3**

to the Corporate Anti-Corruption [Policy](#sub100)

of fraud and corruption

“Entrepreneurship Development Fund “Damu” JSC

Anti-corruption standards of the stock
society “Entrepreneurship Development
Fund “Damu”

Almaty 2019

1. Anti-corruption standards of employees of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter referred to as the Fund) are developed in accordance with [paragraph 2 of Article 10](http://online.zakon.kz/Document/?doc_id=33478302#sub_id=100200) of the Law of the Republic of Kazakhstan "On Combating Corruption."

2. Anti-corruption standards are aimed at achieving an atmosphere of intolerance to any manifestations of corruption in the Fund by creating a system of value and moral anti-corruption guidelines for employees of the Fund (hereinafter referred to as Employees) of behavior in the performance of their official functions.

3. Name of the sphere of social relations: finance.

4. The principles of anti-corruption standards are:

1) legality;

2) transparency;

3) ethics;

4) observance of the rights and legitimate interests of individuals and legal entities and their protection from corruption;

5) prevention of conflicts of interest.

5. Anti-corruption standards are subject to publication on the Fund's Internet resource and in other media.

6. Anti-corruption standards determine the employees of the Fund the following norms of conduct:

1) be guided by the principle of legality, the requirements of the Constitution, laws and other regulatory legal acts of the Republic of Kazakhstan, strictly comply with anti-corruption legislation;

2) ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) prevent, for its part, the commission of actions capable of discrediting the Fund;

4) report to the immediate or direct manager on the occurrence of a conflict of interest, personal interest in the performance of official duties, on inducement to corrupt behavior and receiving gifts;

5) not be guided by personal and (or) selfish interests in the performance of official duties;

6) refrain from contacting colleagues and managers with unlawful requests that violate the established procedure for relations, which may affect their adoption of an impartial official decision;

7) not to induce other employees to commit corruption offenses and not to encourage such actions;

8) not to accept gifts in connection with the performance of official powers;

9) not to use official and other information that is not subject to dissemination in order to obtain or extract property and non-property benefits and advantages;

10) refuse to be appointed to a position if it is connected with direct subordination or control to persons who are in close family and family relations (parents, spouses, brothers, sisters, children, relatives (brothers, sisters, parents and children of the spouse);

11) be active in combating corruption, in disclosing corruption offenses;

12) immediately report to the management on known facts of corruption, including inducement to receive any benefit for accelerated consideration of materials or facts of red tape;

13) immediately in writing inform the direct or immediate supervisor of doubts about the legality of the order received for execution;

14) contact the higher management if the immediate supervisor himself is involved in a conflict of interests;

15) maintain and require colleagues to comply with a high legal anti-corruption culture;

16) take measures on an ongoing basis to eliminate the causes and conditions of a possible conflict of interest, corruption offenses and their consequences;

17) refrain from assisting anyone in carrying out entrepreneurial and (or) other activities related to the extraction of income;

18) refrain from representing or lobbying the interests of third parties, as well as committing actions on their behalf;

19) not to use for non-service purposes the means of material, technical, financial and information support, as well as other state property and official information.

20) notify the Security Service and the Compliance Controller of the intention or actual participation in business activities.

7. Managers at all levels with subordinates are required to:

1) prevent cases of selection and placement of personnel on the grounds of kinship, community and personal devotion, ensure compliance with the principles of meritocracy;

2) accurately determine the tasks and scope of official powers of subordinate employees;

3) prevent uneven distribution of labor load between employees under the authority;

4) show fairness and objectivity in assessing the performance of subordinates, as well as the application of incentives and penalties;

5) not to give to subordinates clearly impossible or beyond the scope of their official duties, as well as orders contrary to the law;

6) not to use the official position to influence the activities of subordinates in solving issues of a non-official nature;

7) not to force subordinate employees to commit corruption offenses;

8) prevent and suppress violations of anti-corruption legislation by subordinates and other employees;

9) timely take comprehensive measures to resolve the conflict of interest arising from a subordinate employee in the course of performing his official duties;

10) take comprehensive measures to prevent corruption;

11) eliminate the causes and conditions that contribute to the commission of corruption offenses by subordinates;

12) prevent the involvement of subordinates for the performance of non-official or personal tasks;

13) by their impeccable behavior to set an example for subordinate employees.

8. Managers at all levels ensure compliance with these Anti-Corruption Standards and organize anti-corruption work among employees subordinate to them.

Appendix 4 is set out in the wording of the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the meeting dated 06.11.20, No. 98/2020 (see previous edition)

**Appendix No. 4**

to the Corporate Anti-Corruption [Policy](#sub100)

 against fraud and corruption

“Entrepreneurship Development Fund “Damu” JSC

Confirmation for employees of the Fund

Use this form to confirm that you have carefully studied, understood and undertake to comply in good faith with the Anti-Corruption Policy of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter - the Policy) and/or [the Law](http://online.zakon.kz/Document/?doc_id=33478302) of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On Combating Corruption" (hereinafter - the Law).

Employees of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter referred to as the Fund) are obliged to send to the personnel development unit this completed and signed form from the date of adoption of the Policy, and newly accepted from the moment of commencement of performance of labor and (or) official duties in the Fund.

|  |  |
| --- | --- |
| Please fill out this form, sign and send it in *hard copy to HR Development* | Since the beginning of the performance of your employment duties in the Fund, you must carefully study, understand and comply with the Policy in good faith.Your Confirmation |
| (*Please* mark the appropriate cells) |
|   | I confirm that I have studied and understood the Policy. |
|   | I undertake to comply with the Policy in good faith. |
|   | Please sign here |
|   | Full Name |
|   | Signature | Date |

Confirmation for employees of the Fund (official)

Use this form to confirm that you agree to the adoption of anti-corruption restrictions provided for by the Anti-Corruption Policy of the “Entrepreneurship Development Fund “Damu” joint-stock company (hereinafter referred to as the Policy) and/or [the Law](http://online.zakon.kz/Document/?doc_id=33478302) of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On Combating Corruption" (hereinafter referred to as the Law), as well as carefully studied, understood and undertake to comply in good faith with the Policy and/or the Law.

Officials of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter referred to as the Fund) are obliged to send to the personnel development unit this completed and signed form from the date of adoption of the Policy, and newly accepted from the moment of commencement of performance of labor and (or) official duties in the Fund.

|  |  |
| --- | --- |
| Please fill out this form, sign and send it in *hard copy to HR Development* | Since the beginning of the performance of my duties in the Fund, I accept anti-corruption restrictions and undertake to carefully study, understand and comply with the Policy in good faith.Your Confirmation |
| (*Please* mark the appropriate cells) |
|   | I accept the anti-corruption restrictions stipulated by the Policy and the Law. |
|   | I confirm that I have studied and understood the Policy. |
|   | I undertake to comply with the Policy in good faith. |
|   | Please sign here |
|   | Full Name |
|   | Signature | Date |

The policy was supplemented by Appendix 5 in accordance with the decision of the Board of “Entrepreneurship Development Fund “Damu” JSC, Protocol of the Meeting dated 13.09.19 No. 124/2019

**Appendix No. 5**

to the Corporate Anti-Corruption [Policy](#sub100)

 of fraud and corruption

“Entrepreneurship Development Fund “Damu” JSC

Training and training program for employees of “Entrepreneurship Development
Fund “Damu” JSC on combating corporate fraud and corruption

1. General Provisions

1.1. The program of training and training of employees of the joint-stock company “Entrepreneurship Development Fund “Damu” (hereinafter referred to as the Fund) on combating corporate fraud and corruption (hereinafter referred to as the Program) was developed in order to form competencies for employees of the Fund in the field of preventing manifestations of fraud and corruption.

1.2. Training in the field of combating fraud and corruption is mandatory for all employees of the Fund (including outstaffing employees) and is carried out by the Compliance Controller or educational organization, taking into account the specifics of the activities of students.

1.3. Training and training of employees of the Fund is carried out in the form of courses:

1) **introductory course** - to familiarize the Fund's employees with the Policy of Combating Corporate Fraud and Corruption of “Entrepreneurship Development Fund “Damu” JSC (hereinafter referred to as the Policy);

2) **main course** - for obtaining knowledge by employees of the Fund necessary for their compliance with the norms of anti-corruption legislation of the Republic of Kazakhstan and the requirements of the Policy, improving and maintaining the effectiveness of internal control systems, programs (plans) for their implementation and other internal documents of the Fund in the field of prevention of corporate fraud and corruption;

3) **course to increase the level of knowledge** - to update knowledge and exchange experience in the field of combating corporate fraud and corruption by employees of the Fund responsible for the prevention of corporate fraud and corruption (Compliance Controller, Security Service, Internal Audit Service and employee of the risk management unit responsible for the internal control system).

2. Procedure for training and training of employees of the Fund

2.1. Employees of the Fund undergo an introductory course when hiring within two months from the date of hiring. The HR Department shall compile a list of employees for the introductory course once every two months and set a date for the course in agreement with the Compliance Controller.

2.2. All employees of the Fund undergo training at the main course annually in accordance with the Plan of Measures to Combat Corporate Fraud and Corruption of the Fund for the corresponding year, with the involvement of an external coach.

2.3. After completing the introductory and basic courses, the Fund's employees are tested. The results of testing employees can be taken into account when accepting personnel issues (hiring after a probation period, transferring to another position within the Fund, bonuses, etc.).

2.4. The course of raising the level of knowledge is carried out in the form of participation in external seminars, trainings and other training events of the Fund's employees responsible for the prevention of corporate fraud and corruption.

2.5. The HR Department keeps records of students and ensures timely completion of courses by all employees of the Fund.