**Financial Settlement Center**

**of Renewable Energy**

Appendix 3

to the decision Of the Supervisory Board of “FSC of RE” LLP

dated November 02, 2022

(Protocol No. 4)

APPROVED

by the decision of the Supervisory Board of “FSC of RE” LLP

dated November 02, 2022

(Protocol No. 4)

**ANTI-CORRUPTION POLICY**

**IN “FSC of RE” LLP**

**Astana, 2022**

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**1. General provisions**

1. This Anti-Corruption Policy in the “FSC of RE” LLP (hereinafter – Anti-Corruption policy and Partnership, respectively) developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, the National Standard of the Republic of Kazakhstan "Anti-corruption Management System", approved by the order of the Chairman of the Committee for Technical Regulation and Metrology dated November 16, 2017 No. 318-od, taking into account the requirements of the International Standard ISO 37001 "Anti-Corruption Management System", the Charter and other internal regulatory documents of the Partnership.

The Anti-corruption Policy is the fundamental internal regulatory document of the Partnership, regulating the basic principles, approaches and requirements for the organization of internal control in order to combat corruption in the Partnership, defines the managerial and organizational foundations for preventing and combating corruption.

2. The Anti-Corruption Policy establishes:

1) goals and objectives in the field of anti-corruption;

2) basic principles of anti-corruption;

3) requirements of the anti-corruption legislation of the Republic of Kazakhstan and obligations to comply with it;

4) a set of measures to prevent and combat corruption;

5) responsibility for compliance with the Anti-Corruption Policy.

3. The main purpose of the Anti-Corruption Policy is to develop and implement in the Partnership a system of measures to identify, study, limit and eliminate the causes and conditions that contribute to the commission of corruption offenses, the formation of an anti-corruption culture that characterizes the commitment of the Partnership, its officials and employees to high standards of behavior, strengthening business reputation and increasing confidence in the Partnership.

**2. Scope of application**

4.The anti-corruption policy is mandatory for familiarization, execution and strict compliance by all officials and employees of the Partnership, as well as employees engaged under a contract for the provision of civil services.

5. The anti-corruption policy is subject to posting on the official website of the Partnership.

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**3. Terms and definitions**

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

1) anti-corruption legislation of the Republic of Kazakhstan - the Law of the Republic of Kazakhstan "On Combating Corruption" and other regulatory legal acts on combating corruption;

2) an official - members of the Supervisory Board of the Partnership, its executive body or a person solely performing the functions of the executive body of the Partnership, as well as a person performing managerial functions in the Partnership (organizational and administrative or administrative and economic functions) and a person authorized to make decisions on the organization and conduct of procurement, holding a position not lower than the head an independent structural unit in a partnership;

3) The Code of Business Ethics is an internal regulatory document of the Partnership that establishes values, basic principles and standards of conduct aimed at developing corporate culture and strengthening the reputation of the Partnership;

4) commercial bribery (illegal remuneration)/a bribe is the illegal transfer of money, securities or other property to an official, as well as the illegal provision of property–related services to him for the use of his official position, as well as general patronage or connivance in the service in the interests of the person engaged in bribery;

5) counterparty (client) – a natural or legal person with whom the Partnership has entered or plans to enter into relations regulated by civil law;

6) conflict of interest - a situation in which the personal interest of an employee/official of the Partnership affects or may affect the impartial performance of his official duties, in which his personal interests may lead to non-performance and (or) improper performance of his official duties, and (or) entails or may entail a contradiction between such personal interest and legitimate the interests of the Partnership, or the threat of a contradiction that can lead to harm to the legitimate interests and (or) business reputation of the Partnership;

7) corruption - illegal use by officials of the Partnership of their official (official) powers and related opportunities in order to obtain or extract personally or through intermediaries

property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons by providing benefits and advantages;

8) a corruption offense is an unlawful guilty act (action or omission) that has signs of corruption, for which administrative and criminal liability is established by law;

9) corruption risk — a potential event (or combination of circumstances) in the future, which, if implemented, may violate the requirements of the anti-corruption

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legislation of the Republic of Kazakhstan and Anti-Corruption Policy, as well as influence the occurrence of this risk;

10) gift – any gifts, services, invitations, money, trips, other forms of remuneration provided by employees and (or) officials of the Partnership on behalf and (or) at the expense of the Partnership to counterparties (clients) and other third parties, as well as gifts, services, invitations, money, trips, other forms remuneration that the Partnership or an employee and/or an official of the Partnership receives from counterparties (clients) and other third parties as part of the performance of their duties in the Partnership;

11) mediation in commercial bribery (illegal remuneration)/ in bribery – direct transfer of the subject of commercial bribery (illegal remuneration)/bribes on behalf of the person transferring the subject of commercial bribery /bribe-giver or the person receiving the subject of commercial bribery/bribe-taker, or other assistance to the specified persons in achieving or implementing an agreement between them on receiving and/or giving the subject of commercial bribery/bribe;

12) prevention of corruption - the activity of the Partnership to study, identify, limit and eliminate the causes and conditions that contribute to the commission of corruption offenses by developing and implementing a system of preventive measures;

13) anti—corruption - the activity of the Partnership within its powers to prevent corruption, including the formation of an anti-corruption culture in the Partnership, the identification and elimination of the causes and conditions conducive to the commission of corruption offenses, as well as the identification, suppression, disclosure and identification of corruption offenses during verification, elimination of their consequences;

14) employees — individuals who are in labor relations with the Partnership, as well as persons engaged under a contract for the provision of civil services.

7. The definitions applied, but not disclosed in the Anti-Corruption Policy, correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Partnership.

**4. The purpose and objectives in the field of anti-corruption**

8. The purpose of combating corruption in the Partnership is to minimize the risk of involvement of officials and employees of the Partnership, regardless of their position, in corruption activities.

9. In order to achieve this goal, the Anti-Corruption Policy provides for the following tasks:

1) formation of an understanding of zero tolerance for any corruption among officials and employees of the Partnership;

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2) generalization and explanation of the main requirements of the anti-corruption legislation of the Republic of Kazakhstan, which can be applied to the Partnership, its officials and employees;

3) establishing the obligation of officials and employees of the Partnership to know and comply with the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, Anti-Corruption Policy, as well as to carry out adequate procedures for the prevention and prevention of corruption;

4) development and implementation of anti-corruption measures aimed at preventing and combating corruption, minimizing and (or) eliminating the consequences of corruption offenses.

**5. Basic principles of anti-corruption**

10. The main principles of combating corruption in the Partnership are:

1) zero tolerance for any manifestations of corruption – The Partnership adheres to the principle of complete rejection of corruption in any forms and manifestations in the implementation of its activities.

The principle of zero tolerance for any manifestations of corruption means a strict prohibition for officials and employees of the Partnership acting on behalf of the Partnership or in its interests, directly or indirectly, personally or through any mediation to participate in corrupt actions;

2) the commitment of the top management to an irreconcilable attitude towards corruption – the Supervisory Board of the Partnership plays a key role in the formation of a culture of intolerance to corruption and the creation of a system of prevention and combating corruption in the Partnership. The members of the Supervisory Board of the Partnership, its executive body or a person who alone performs the functions of the executive body of the Partnership must declare an irreconcilable attitude to any forms of corruption and at all levels, demonstrate, observe and implement this principle by personal example;

3) Employee engagement – The Partnership informs its officials and employees about the provisions of the anti-corruption legislation of the Republic of Kazakhstan and welcomes their active participation in the formation and implementation of anti-corruption standards and procedures;

4) inevitability of punishment – The Partnership declares the inevitability of punishment of officials and employees of the Partnership, regardless of their position, work experience and other conditions, in case they commit corruption offenses in the performance of their official duties;

5) the effectiveness of anti–corruption procedures - The Partnership strives to make the procedures as transparent, clear, feasible as possible, which ensure the simplicity of their implementation and obtaining a meaningful result;

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6) due diligence – The Partnership checks third parties and candidates for employment before making a decision on the beginning or continuation of business/labor relations for their reliability, rejection of corruption and absence of conflict of interests;

7) interaction and coordination – The Partnership ensures interaction and cooperation in the field of anti-corruption activities with state bodies and third parties of the Partnership, as well as coordination of actions in the process of combating corruption.

**6. Requirements of the anti-corruption legislation of the Republic of Kazakhstan and obligations for its implementation**

11. In accordance with the anti-corruption legislation of the Republic of Kazakhstan, corruption crimes/offenses for which responsibility is provided are the following (but are not limited to the listed):

1) misappropriation or embezzlement of someone else's entrusted property committed by an official, if these acts involve the use of his official position;

2) fraud committed by an official, if it involves the use of his official position;

3) legalization (laundering) of money and (or) other property obtained by criminal means, committed by an official, if this act involves the use of his official position;

4) economic smuggling committed by an official, if this act involves the use of his official position;

5) illegal acquisition of ownership rights to a share of participation in a legal entity, property and securities of a legal entity or the establishment of control over a legal entity committed by an official, if this act involves the use of his official position;

6) abuse of official powers, abuse of power or official powers, if these acts have caused significant harm to the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state;

7) the establishment of an organization engaged in entrepreneurial activity, or participation in the management of such an organization personally or through a proxy, contrary to the prohibition established by law, if this act is associated with the provision of benefits and advantages to such an organization or with patronage in another form;

8) receiving a bribe, giving a bribe, mediation in bribery;

9) official forgery, if these acts are committed for the purpose of extracting benefits and advantages for oneself or other persons or organizations or causing harm to other persons or organizations;

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10) inaction if it entailed a significant violation of the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state;

11) negligence, if it entailed causing substantial harm to the rights and legitimate interests of citizens or organizations or the legally protected interests of society or the state;

12) provision of illegal material remuneration by individuals and legal entities;

13) receipt of illegal material remuneration by an official;

14) hiring of persons who have previously committed a corruption crime.

12. Officials of the Partnership 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, to promote the satisfaction of the material interests of organizations or individuals through the unlawful use of their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activity, 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 the 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.

Officials of the Partnership have the right to lease (lease) a dwelling belonging to them by right of ownership and receive income from such a lease.

13. In compliance with the requirements of the anti-corruption Legislation of the Republic of Kazakhstan, officials and their spouses shall submit in the form and in the manner determined by the tax legislation of the Republic of Kazakhstan:

1) declaration of assets and liabilities – before the issuance of an act of an official (body) entitled to appoint (elect) to a position, on appointment to a position (as of the first day of the month of submission of the declaration);

2) declaration of income and property – annually. In case of acquisition of property determined by the tax legislation of the Republic of Kazakhstan during the reporting calendar year, this declaration reflects information about the sources of covering the costs of acquiring the specified property.

Failure to submit a declaration of assets and liabilities and (or) a declaration of income and property, or submission of incomplete, unreliable information in such declarations, if the act does not contain signs of a criminal offense:

is the basis for refusing to grant a person the appropriate powers of an official;

entails liability provided for by the Code of the Republic of Kazakhstan on Administrative Offenses.

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The information reflected in the declarations of officials and their spouses is subject to publication no later than December 31 of the year following the reporting calendar year, according to the list determined by the authorized anti-corruption organ.

The specified information is posted by the structural unit responsible for the formation and provision of personnel policy in the Partnership on the official website of the Partnership.

14. The Partnership, its officials and employees are obliged to comply with the norms of the anti-corruption legislation of the Republic of Kazakhstan, as well as the principles and requirements of the Anti-Corruption Policy. When implementing the Anti-Corruption Policy, the Partnership proceeds from the fact that its officials and employees, directly or indirectly, personally or through third parties, are prohibited from participating in corrupt actions, namely:

1) to offer, promise or carry out bribery, that is, to provide or promise to provide any financial or other benefit/advantage with the intent to induce any person to perform his official duties improperly;

2) to demand, agree to accept or accept items of commercial bribery/bribery, that is, to receive or agree to receive any financial or other benefit/advantage for the performance of their official duties improperly;

3) offer, promise or make payments, except as provided for by applicable law, to present gifts to persons authorized to perform state functions, as well as persons equated to them, for speeding up or simplifying established procedures;

4) offer, promise or make payments to third parties if there is a suspicion that payments can be used to speed up or simplify established procedures;

5) offer, promise or provide employment in the Partnership (including on a temporary basis) in exchange for personal benefits;

6) facilitate the acceptance or acceptance of inflated or fictitious payments from third parties;

7) to give or receive gifts or other signs of hospitality that contradict the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the internal regulatory documents of the Partnership.

15. Officials of the Partnership in their professional activities must strictly observe the following standards of conduct:

1) comply with the requirements of the legislation of the Republic of Kazakhstan and Anti-Corruption Policy;

2) be honest and decent in business relations, refrain from any unfair methods of conducting official duties;

3) to prevent the commission of actions capable of discrediting the Partnership;

4) not to use for personal purposes the official position and confidential information, tangible and intangible assets of the Partnership;

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5) to prevent illegal actions, or actions that may raise suspicions about their legality and ethics;

6) to support and demand from colleagues the observance of a high legal anti-corruption culture;

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

8) not to incite other employees to commit corruption offenses and not to encourage such actions;

9) not to carry out official duties in the presence of a conflict of interests.

16. Employees of the Partnership are obliged to:

1) refrain from committing and (or) participating in the commission of corruption offenses in the interests or on behalf of the Partnership;

2) refrain from behavior that can be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of the Partnership;

3) inform the direct supervisor about the possibility of a conflict of interest arising or arising from the employee.

If there are doubts about the correctness of their actions or any other standards of conduct, officials and employees of the Partnership may contact the anti-corruption compliance service (compliance officer), their direct or superior manager of the Partnership.

**7. A set of measures to prevent and combat corruption**

17. The Partnership, in carrying out its activities, takes measures to prevent corruption, including minimizing the causes and conditions that contribute to the commission of corruption offenses, by:

1) establishment of organizational and legal mechanisms that ensure accountability, accountability and transparency of decision-making procedures;

2) compliance with the principles of fair competition;

3) prevention and settlement of conflicts of interest;

4) acceptance and compliance with business ethics standards;

5) taking measures to form an anti-corruption culture;

6) interaction with state bodies and other organizations on the prevention of corruption.

18. In order to counteract corruption, the Partnership:

1) form and comply with the anti-corruption standard established for the activities of the Partnership;

2) complies with anti-corruption restrictions;

3) conducts anti-corruption monitoring and internal analysis of corruption risks;

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4) reports corruption offenses and eliminates their consequences.

19. The Partnership annually identifies, evaluates corruption risks, and develops measures to minimize them in accordance with the internal documents on risk management of the Partnership.

The purpose of identifying and assessing corruption risks is to identify those types of activities and business processes of the Partnership that are subject to the risks of non-compliance with anti-corruption legislation and where officials and employees of the Partnership are likely to commit corruption offenses both for personal gain and for the benefit of the Partnership.

The areas of activity of the Partnership in which corruption risk may arise include, but are not limited to the following:

1) involvement of third parties and making payments to third parties;

2) gifts and representation expenses;

3) personnel management.

20. Based on the results of the evaluation, the Partnership develops, approves and maintains up-to-date a list of business processes, positions and functions with an increased risk of corruption.

**8. Involvement of third parties and making payments**

**to third parties**

21. The Partnership refrains from involving third parties that violate the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, Anti-Corruption Policy or create a risk of loss of business reputation for the Partnership.

22. Before making a decision to start or continue business cooperation with third parties, the relevant structural units of the Partnership initiating the involvement of third parties are obliged to:

1) comply with the procedures established by the legislation of the Republic of Kazakhstan on public procurement, on support of renewable energy sources, on electric power and other regulatory legal acts, as well as internal regulatory documents on the organization and conduct of public procurement of goods, works and services of the Partnership;

2) monitor third parties for any manifestations of corruption by carrying out the following procedures (including, but not limited to):

verification of the existence of their own anti-corruption policies and procedures, readiness to comply with the requirements of Anti-Corruption Policy and to carry out mutual cooperation in the field of anti-corruption;

business reputation checks and the absence of a conflict of interest;

checks for false entrepreneurship, reliability, the presence of tax and other debts, the source of funds, as well as the bank, the jurisdiction from which funds

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obtained by criminal means are sent by sending requests to the relevant authorized state bodies and organizations (the Ministry of Finance, the National Bank of the Republic of Kazakhstan and others) or to use data posted in information resources of relevant bodies and organizations;

3) include an anti-corruption clause in the concluded transactions after making changes to the relevant regulatory legal acts. The Partnership reserves the right to terminate transactions with third parties in case of detection of corruption on their part;

4) inform third parties about the principles and requirements of the Anti-Corruption Policy.

**9. Gifts and representation expenses**

23. The Partnership recognizes the exchange of business gifts and the implementation of representative expenses, including business hospitality, as a necessary part of doing business and generally accepted business practice.

The Partnership encourages an atmosphere of honesty and transparency regarding business gifts and business hospitality expenses.

The partnership excludes the personal element, that is, not giving a gift and other items personally to an individual.

24. The exchange of business gifts and the implementation of representative expenses, including business hospitality of the Partnership with third parties, must meet the following criteria:

1) fully comply with the norms of the current legislation of the Republic of Kazakhstan, internal documents of the Partnership on representation expenses;

2) to be reasonably justified, proportionate, not to be cash or non-cash funds, securities, precious metals and not to represent other types or equivalents of cash, as well as not to be a luxury item;

3) do not represent a hidden reward for a service, action, inaction, connivance, patronage, granting of rights, making a certain decision on a transaction, agreement, license, permit or an attempt to influence the recipient for another illegal or unethical purpose;

4) not to create a risk that may lead to loss of business reputation for the Partnership, its officials and employees.

25. It is prohibited to accept gifts and hospitality from any counterparty (client), a potential participant in purchases carried out by the Partnership. If there are doubts about the compliance of a business gift or event with the requirements of the Anti-Corruption Policy, an official or employee of the Partnership should consult with the anti-corruption compliance service (compliance officer) of the Partnership, the direct or superior head of the Partnership.

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**10. Personnel management**

26. The Partnership adheres to the principles of objectivity and honesty in making personnel decisions, establishes values, basic principles and standards of conduct aimed at developing corporate culture and strengthening the reputation of the Partnership.

In order to eliminate corruption risks when hiring, evaluating, promoting and dismissing staff, the Partnership:

1) develops and approves, in accordance with the established procedure, transparent procedures for the selection and recruitment of personnel, as well as relevant qualification requirements for the position;

2) making a decision on the beginning or continuation of an employment relationship for their reliability and the absence of a conflict of interests;

3) assesses the activities of the staff and pays remuneration based on the effectiveness of its key performance indicators and professional achievements;

4) decides on promotion to a higher position based on the business qualities and qualifications of the employee;

5) carries out the procedure of termination of employment relations with an employee on the grounds provided for by the legislation of the Republic of Kazakhstan;

6) develops and complies with the requirements of the Code of business Ethics of the Partnership.

27. The consent of officials established by the anti-corruption legislation of the Republic of Kazakhstan to adopt anti-corruption restrictions is fixed by the structural unit responsible for the formation and provision of personnel policy in the Partnership within no more than 5 working days from the date of taking office/ hiring in accordance with Annex 1 to the Anti-Corruption Policy.

28. In case of non-acceptance of anti-corruption restrictions by the officials of the Partnership established by the anti-corruption legislation of the Republic of Kazakhstan, the information is brought to the attention of the Supervisory Board of the Partnership by the anti-corruption compliance service (compliance officer) for appropriate measures.

29. Failure to accept anti-corruption restrictions by officials of the Partnership established by the anti-corruption legislation of the Republic of Kazakhstan entails refusal to hire (appointment, election) or dismissal (termination of powers).

30. Non-compliance by the officials of the Partnership with the anti-corruption restrictions established by the anti-corruption legislation of the Republic of Kazakhstan, in cases of absence of signs of a criminally punishable act and an administrative offense, is the basis for termination of their powers / dismissal.

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**11. Prevention and settlement of conflicts of interest**

31. Conflict of interest management is one of the most important anti-corruption mechanisms. The Partnership pays great attention to preventing the realization of risks associated with a conflict of interests, their identification and settlement.

32. Officials and employees of the Partnership, when performing their official duties, are obliged to be guided by the interests of the Partnership and avoid situations or circumstances in which their personal interests will contradict the interests of the Partnership.

In the event of a conflict of interest (or the possibility of its occurrence), officials and employees of the Partnership are obliged to bring this information in writing to the attention of the anti-corruption compliance service (compliance officer), the direct head or the superior head of the Partnership.

33. The Chairman of the Supervisory Board or the General Director of the Partnership, upon requests from officials and employees or upon receipt of information from other sources, are obliged to take timely response measures in accordance with the Policy on Conflict of Interest Resolution in the “FSC of RE” LLP.

34. The Partnership must keep records of affiliated persons, in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Partnership.

**13. Anti-corruption monitoring**

35. Anti-corruption monitoring in the Partnership includes measures to collect, process, summarize, analyze and evaluate information related to the effectiveness of the implementation of Anti-Corruption Policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption by the Partnership.

36. The subject of anti-corruption monitoring is the activity of the Partnership. Anti-corruption monitoring is carried out by the anti-corruption compliance service (compliance officer) by the decision of the Supervisory Board, the results of which may be the basis for conducting an internal analysis of corruption risks, as well as for improving measures aimed at forming an anti-corruption culture.

37. Anti-corruption monitoring is carried out by:

1) studying the activities of the structural units of the Partnership on anti-corruption issues;

2) study of publications in the mass media and appeals of individuals and legal entities on anti-corruption issues;

3) consideration of the results of sociological surveys on anti-corruption issues.

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38. The results of anti-corruption monitoring are sent to the authorized anti-corruption body for generalization.

39. When conducting anti-corruption monitoring, the Partnership is guided by the Rules of Anti-corruption Monitoring approved by the authorized state anti-corruption body.

**14. Internal analysis of corruption risks**

40. Internal analysis of corruption risks (hereinafter referred to as Analysis) refers to the activity of identifying and studying the causes and conditions that contribute to the commission of corruption offenses.

41. The decision to conduct the Analysis is made by the General Director of the Partnership, including on the basis of the results of anti-corruption monitoring.

42. The object of the Analysis is the activity of the structural divisions of the Partnership and is carried out in the following areas:

1) identification of corruption risks in internal documents affecting the activities of the structural unit;

2) identification of corruption risks in the organizational and managerial activities of the structural unit.

43. In internal documents affecting the activities of the structural unit, discretionary powers and norms that contribute to the commission of corruption offenses are identified.

44. Under the organizational and managerial activities of the structural unit, the following issues are raised:

personnel management, including staff turnover;

conflict of interest settlement;

provision of public services;

implementation of the functions of the structural unit;

other issues arising from the organizational and managerial activities of the unit.

45. The internal analysis of corruption risks is carried out in accordance with the procedure defined by the Rules for Conducting Internal Analysis and Identifying Corruption Risks in “FSC of RE” LLP, approved by the Supervisory Board of the Partnership.

46. For any corruption scheme, a zero level of risk tolerance has been adopted and in each case the Partnership develops and takes measures to minimize the risks of corruption identified by the results of internal analysis and eliminate the causes and conditions that contribute to the commission of corruption offenses.

The results of the internal analysis of corruption risks and information on the measures taken are brought to the attention of the Supervisory Board of the Partnership.

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The procedure for identifying and assessing corruption risks and developing measures to minimize them is regulated by the Anti-Corruption Policy and other internal regulatory documents of the Partnership.

**15. Development of anti-corruption standards, formation of an anti-corruption culture**

47. Anti-corruption standards - a system of recommendations established for the activities of the Partnership aimed at preventing corruption in accordance with the anti-corruption standard approved by the Supervisory Board of the Partnership.

48. The Anti-Corruption Standard of the Partnership defines the actions and decisions of persons working in the Partnership aimed at strict compliance with them and prevention of corruption manifestations.

49. The anti-corruption standard of the Partnership is taken into account when developing internal documents of the Partnership.

50. The objectives of the implementation of the anti-corruption standard of the Partnership are:

1) formation of sustainable anti-corruption behavior of persons working in the Partnership;

2) timely detection of corruption manifestations and prevention of their negative consequences;

3) formation of an anti-corruption culture;

4) anti-corruption education.

51. The Partnership forms an anti-corruption culture in its activities aimed at preserving and strengthening a value system in the Partnership that reflects intolerance to corruption.

The formation of an anti-corruption culture is the duty of every official and employee of the Partnership, which is carried out by conducting explanatory work in the Partnership and other measures provided for by the legislation of the Republic of Kazakhstan.

52. The Partnership strives to carry out anti-corruption education of its employees by conducting a continuous process of education and training carried out for the purpose of moral, intellectual, cultural development and the formation of an active civil position of rejection of corruption by the individual.

**16. Reports on corruption offenses**

**(initiative information system)**

53. If there is any evidence that a corruption offense has taken place in the Partnership, it must be immediately reported to the Partnership's "hotline" (initiative information system) or to the anti-corruption compliance service (compliance officer) Partnerships.

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54. A system of proactive reporting of violations is created in the Partnership in order to enable employees and other interested parties to confidentially or anonymously express their reasonable suspicions about committed or planned violations by officials, employees of the Partnership or in relation to officials, employees of the Partnership.

55. The Partnership requires officials and employees to report reasonable assumptions about potential facts of corruption and any violations of the requirements of internal regulatory documents of the Partnership and the legislation of the Republic of Kazakhstan, and also encourages well-intentioned information about their doubts.

56. The Partnership ensures confidentiality and protection from prosecution of the applicant, as well as objective consideration of all communications through the Partnership's created notification tools. The Partnership provides an opportunity for anonymous messages on the Hotline.

57. The Partnership considers it unacceptable and strives to promptly identify and prevent retaliatory measures against officials/ employees of the Partnership who have faithfully reported the alleged fact of a corruption offense committed by another official/employee of the Partnership, even if such suspicion has not been confirmed.

58. All officials/employees of the Partnership should be familiar with the procedures for proactive information and be able to use them, as well as be aware of their rights and the protection measures provided by these procedures. To achieve this goal, information about the initiative information system should be part of the mandatory list for familiarization when applying for employment in a Partnership.

**17. Official inspections of corruption offenses**

59. For all reports of corruption offenses in the Partnership, an internal audit is conducted with the participation of the anti-corruption compliance service (compliance officer) and the relevant structural units of the Partnership (if necessary) within a reasonable time.

60. If, according to the results of an internal audit, the fact of corruption is established, the completion of the audit is considered to be the adoption of corrective measures based on the principle of zero tolerance for any manifestations of corruption, up to the termination of employment relations and the transfer of materials to the relevant authorized state bodies.

**18. Mutual cooperation**

61. The Partnership cooperates with authorized state bodies and organizations, as well as third parties in the field of combating corruption on the basis of the principle of reciprocity, in order to:

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1) informing about cases of violations that have signs of corruption;

2) assistance in conducting investigations of violations with signs of corruption;

3) coordination during inspections of the Partnership's activities on compliance with anti-corruption legislation and the development of joint measures to prevent and combat corruption;

4) providing comments/participating in meetings (meetings) at the request of authorized state bodies and organizations related to issues of anti-corruption legislation.

**19. Responsibility**

62. Officials and employees of the Partnership for committing corruption offenses bear criminal, administrative, civil and disciplinary responsibility in accordance with the legislation of the Republic of Kazakhstan.

. 63. Officials and employees of the Partnership, to whom criminal, administrative and civil liability measures have been applied for committing corrupt acts, are not exempt from liability, up to full compensation for material damage.

64. Officials within their powers, as well as managers of third parties – contractors (clients) working on behalf of the Partnership within the framework of contractual relations, or on behalf of a higher authority (auditors, agents, consultants, etc.) They are responsible for organizing and coordinating activities to implement the requirements established by the Anti-Corruption Policy.

65. The heads of the Partnership at all levels bear disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-fulfillment or improper fulfillment of the requirements of the Anti-Corruption Policy, as well as official duties to prevent the commission of corruption offenses by subordinate employees.

66. Officials and employees of the Partnership are responsible for fulfilling the requirements of the Anti-Corruption Policy within their competence.

67. In order to strictly comply with the Anti-Corruption Policy, officials and employees of the Partnership must annually fill out and sign a declaration of conflict of interest in accordance with Annex 2 to the Anti-Corruption Policy.

**20. Final provisions**

68. The provisions and requirements of the Anti-Corruption Policy are mandatory for execution and compliance by all officials and employees of the Partnership.

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69. Issues not regulated by the Anti-Corruption Policy are regulated by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Partnership.

70. If certain points of the Anti-Corruption Policy as a result of changes in the legislation of the Republic of Kazakhstan, the Charter of the Partnership come into conflict with them, the Anti-Corruption Policy is applied in the part that does not contradict the legislation of the Republic of Kazakhstan and the Charter of the Partnership.

71. Familiarization with the Anti-Corruption Policy is mandatory for all officials and employees of the Partnership, which must be confirmed in writing by a statement in accordance with Annex 3 to the Anti-Corruption Policy. The confirmation must be kept in the personal files of officials and employees of the Partnership together with completed forms in accordance with the requirements of paragraphs 27 and 67 of the Anti-Corruption Policy.

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Appendix 1

to the Anti-Corruption Policy in the “FSC of RE” LLP

Form

**STATEMENT**

**ON THE ADOPTION OF ANTI-CORRUPTION RESTRICTIONS**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(full name)* \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(post)*

in accordance with paragraph 1 of Article 12 of the Law of the Republic of Kazakhstan "On Combating Corruption" (hereinafter referred to as the Law), taking into account the specifics established by Articles 13, 14, 14-1 and 15 of the Law, and in order to comply with the requirements of the Law and the Anti–Corruption Policy of “FSC of RE” LLP, preventing the commission of actions that may lead to the use of my powers in personal, group and other non-official interests, I assume the following anti-corruption restrictions on:

1) carrying out activities incompatible with the performance of official functions;

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

3) the use of official and other information that is not subject to official dissemination 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 are included in official powers or by virtue of official position can contribute to such actions (inaction).

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(position/signature / full name)

«\_\_\_\_\_» \_\_\_\_\_\_\_\_20\_\_\_\_y.

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Appendix 2

to the Anti-Corruption Policy in “FSC of RE” LLP

Form

**Declaration of Conflict of Interest**

«\_\_\_\_\_» \_\_\_\_\_\_\_\_\_\_\_\_\_20\_\_\_ y.

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*(full name and position of the declarant)* \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(name of the organization)*

This document is confidential and will be used only in “FSC of RE” LLP. The information provided in the declaration will not be disclosed to the outside party.

The declarant should carefully read the questions below and answer "Yes" or "No" to each of them. It should be noted that the answer "yes" does not necessarily confirm the existence of a conflict of interest, but indicates aspects that require separate discussion and settlement.

The validity period of the declaration is 1 year.

**Statement**

Before filling out this Declaration, I have read/familiarized myself with

*1. Anti-Corruption Policy in “FSC of RE” LLP;*

*2. Instructions on combating corruption and commercial bribery in the “FSC of RE” LLP;*

*3. Anti-corruption standards of the “FSC of RE” LLP;*

*4. Policy on Conflict of Interest Settlement in “FSC of RE” LLP;*

*5. The Rules for conducting internal analysis and identifying corruption risks in the “FSC of RE” LLP*

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*(full name and initials of the declarant)*

«\_\_\_\_\_» \_\_\_\_\_\_\_\_20\_\_\_\_y.

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The declarant fills in and signs each sheet with his own hand

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| № | Questions | YES | NO |
| 1 | We ask you to list the legal entities belonging to you or your close relatives, indicate whether you or your close relatives carry out activities as an individual entrepreneur: |  |  |
| 2 | Please list the close relatives working in the “FSC of RE” LLP (position, division):  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |
|  | For current employees of “FSC of RE” LLP - indicate whether these relatives are subordinate to you or whether they are your supervisors, as well as whether you and your relatives participate in the same production process:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |
| 3 | **Are you or the persons representing your interests the direct owner, beneficiary or shareholder (participant), or have another financial interest:** |  |  |
| 3.1 | in an organization that is a business partner of “FSC of RE” LLP (counterparty, contractor, supplier, etc.) |  |  |
| 3.2 | in an organization that is planning or taking actions  to become a business partner of “FSC of RE” LLP or is negotiating with it |  |  |
| 3.3 | in the activities of other persons (legal entities or individuals), the purpose, interests and scope of activity of which are identical to the goals, interests and scope of activity of “FSC of RE” LLP |  |  |
| 3.4 | in an organization acting as a party in a court or other  proceeding with RFC RES LLP |  |  |
| 4 | **Are you and/or your close relatives and/or persons representing your interests, members of management bodies (Board of Directors, Management Board) or executive heads (directors, deputy directors, etc.), as well as employees, advisers, representatives or other affiliated persons:** |  |  |
| |  |  |  | | --- | --- | --- | | **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption policy**  **in “FSC of RE” LLP** | | | **revision 1** | **page 22 of 26** | | | | |
| 4.1 | In an organization that is a business partner of “FSC of RE” LLP (counterparty, contractor, supplier, etc.) |  |  |
| 4.2 | In an organization that plans or takes actions to become a business partner of “FSC of RE” LLP or conducts negotiations with it, including participating in the procurement procedure / bidding for the supply of goods, works, services for “FSC of RE” LLP |  |  |
| 4.3 | 4.3. In the activities of competitors of “FSC of RE” LLP (any  legal entities or individuals) |  |  |
| 5 | **5 Personal interests and honest business conduct** |  |  |
| 5.1 | 5.1. Have you participated in any commercial transaction on behalf of “FSC of RE” LLP (as a decision-maker, responsible for fulfilling the terms of the contract, accepting works or services, signing/approving the act of completed works, etc.), in which you and/or your family members (or persons equated to them, such as parents, spouse), children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children) and other persons had a personal interest |  |  |
| 5.2 | Have you provided assistance to a business partner of “FSC of RE” LLP, in which you and/or your family members (or persons equated to them, such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), as well as persons representing your interests, had a personal interest |  |  |
| 6 | **Equal rights of employees** |  |  |
| 6.1 | Do your close relatives or persons equated to them, such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children work under your leadership in the “FSC of RE” LLP |  |  |
| 6.2 | Do your close relatives or persons equated to them, such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children, work in the “FSC of RE” LLP in a position that has an impact on the evaluation of the effectiveness of your work) |  |  |
| 6.3 | Did you contribute to the employment in the “FSC of RE” LLP, appointment to a higher position, did you evaluate the work, did you determine the amount of salary or contributed to the refusal to impose disciplinary liability, or provided another type of patronage for your close relatives or persons equated to them, such as parents, spouse), children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and |  |  |
| |  |  |  | | --- | --- | --- | | **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption policy**  **in “FSC of RE” LLP** | | | **revision 1** | **page 23 of 26** | | | | |
|  | spouses of children |  |  |
| 7 | **Other issues** |  |  |
| 7.1 | Are you aware of other situations or circumstances not described above that lead or may lead to a conflict of interest, or may give your colleagues and supervisors the impression that you are in a conflict of interest when making decisions |  |  |

**STATEMENT**

1. I hereby confirm that I have read (read) and understood (understood) all of the above questions and my answers to them, any explanatory information is complete, truthful and reliable.

2. I hereby consent to the processing of my personal data specified in this declaration by “FSC of RE” LLP.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(signature/ surname and initials of the declarant)*

«\_\_\_\_\_» \_\_\_\_\_\_\_\_20\_\_\_\_y.

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Appendix 3

to the Anti-Corruption Policy in the “FSC of RE” LLP

Form

**Confirmation**

Please check the appropriate boxes

□ I confirm that I have studied and understood the Anti-Corruption Policy “FSC of RE” LLP.

□ I undertake to strictly comply with anti-corruption standards and restrictions, as well as to follow the requirements established by the Anti-Corruption Policy at “FSC of RE” LLP.

□ I agree to confirm once a year during the term of performance of labor and/or official duties that I have studied, understood and undertake to follow the requirements established by the Anti-Corruption Policy in the “FSC of RE” LLP.

□ I am notified that if I violate the Anti-Corruption Policy of “FSC of RE” LLP, I may be brought to disciplinary, civil, administrative and criminal liability, including dismissal from my post, in accordance with the procedure established by legislative acts of the Republic of Kazakhstan.

□ I undertake to take measures to prevent and prevent any possibility of a conflict of interest and immediately notify the Employer of the conflict of interest or the possibility of its occurrence as soon as he becomes aware of it, in order to resolve the conflict of interest.

Please sign here

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(signature / full name of the signatory)

«\_\_\_\_\_» \_\_\_\_\_\_\_\_20\_\_\_\_y.

Note:

Use this form to confirm that you have carefully studied, understood and undertake to faithfully follow the requirements established by the Anti-Corruption Policy in the “FSC of RE” LLP.

The completed and signed confirmation form from the moment of performance of labor and (or) official duties in the “FSC of RE” LLP is stored in the personal file of each employee of the “FSC of RE” LLP.

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**Approval Sheet**

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| **Post** | **Full name** | **Date** | **Signature** |
| General Director | Nalibayeva G.K. |  |  |
| Director of the Department of Legal Support and Administrative Support | Baktygalieva E.V. |  |  |
| Compliance Officer  Anti-Corruption  Compliance Service | Mukusheva M.Sh. |  |  |

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**The List of Familiarization**

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| **№** | **Post** | **Full name** | **Date**  **of acquaintance** | **Signature** |
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