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| **Financial Settlement Center of Renewable Energy** |

Appendix 7 to the decision of the Supervisory Board of LLP «FSC of RE»

dated November 02, 2022 (Protocol No. 4)

APPROVED

by the decision of the Supervisory Board

of LLP «FSC of RE»

dated November 02, 2022 (Protocol No. 4)

**RULES**

**FOR INTERNAL ANALYSIS AND IDENTIFICATION**

**OF CORRUPTION RISKS IN**

**LLP "FSC OF RE"**

**Аstana, 2022**

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| **Financial Settlement Center of Renewable Energy** | **Rules for internal analysis and identification of corruption risks in LLP "FSC of RE"** |
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**1. Subject and scope of application**

1. In order to prevent corruption risks in the LLP " Financial Settlement Center for Support of Renewable Energy" (hereinafter - the Partnership) has developed these Rules for internal analysis and identification of corruption risks in the LLP "FSC of RE" (hereinafter – Rules) in accordance with the anti-corruption legislation of the Republic of Kazakhstan, Standard Rules for Conducting Internal Analysis of Corruption Risks, approved by Order No. 12 of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 as well as Methodological Recommendations for Conducting Internal Analysis of Corruption Risks, approved by the Agency of the Republic of Kazakhstan for Anti-Corruption dated April 07 2021, the Charter and other internal regulatory documents of the Partnership.

2. The Rules determine the importance of preventing corruption risks in the Partnership (hereinafter referred to as Corruption Risk) both within the framework of daily activities and as a result of an internal analysis of corruption risks, aimed at timely identification, identification, control and taking measures to reduce Corruption risks that may arise when:

1) Involving of third parties and making payments to counterparties (clients) and other third parties;

2) Receiving gifts and representation expenses;

3) Personnel management.

3. The Rules are an internal regulatory document of the Partnership, the main purpose of which is to prevent the occurrence of corruption risks in the activities of the Partnership, including transactions, contracts, agreements, contracts and other documents defining legal relations with third parties, as well as business processes for interacting with third parties and managing the personnel of the Partnership.

4. The Rules apply to:

1) All officials and employees of the Partnership, regardless of the level of their position and functions performed, as well as employees engaged under a contract for the provision of civil services.

2) All contractual relations of the Partnership;

3) All business processes of the Partnership, including personnel management.

5. Corruption risk is a potential event (or a combination of circumstances) in the future, which, if implemented, may violate the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy in LLP “FSC of RES”, as well as influence the occurrence of this risk.

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6. The Rules are mandatory for familiarization and application by all structural divisions and employees of the Partnership. In the performance of functional duties and the implementation of assigned tasks, the employees of the Partnership should be guided by the Rules.

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

8. The main principles of the Corruption risk management process are:

1) Integrity – consideration of corruption risk elements in all acts of the Partnership in the context of the corporate risk management system;

2) Openness – prohibition of considering the corruption risk management system as autonomous or separate, as well as the dissemination of this principle in all contractual acts of the Partnership;

3) Awareness – accompanied by the presence of objective, reliable and up–to-date information in the contractual acts of the Partnership;

4) Continuity - the monitoring process to identify Corruption risks in the activities of the Partnership is carried out on an ongoing basis based on.

2. **Identification of risks**

9. The Partnership on an ongoing basis identifies potential events in the activities of the Partnership, including in transactions, contracts, agreements and contracts, as well as in other acts that may affect the activities of the Partnership, and determines whether they are the causes and conditions for the occurrence of Corruption risks. When identifying events, various internal and external factors that can cause Corruption risks, prerequisites and opportunities are considered.

10. Risk identification is the determination of the Partnership's exposure to the impact of events, the occurrence of which may negatively affect the implementation of the Anti–Corruption Policy in the LLP “FSC of RES” and violation of the anti-corruption legislation of the Republic of Kazakhstan.

The purpose of the procedure for identifying Corruption risks in transactions, contracts, agreements and contracts of the Partnership is to identify those types of activities and business processes of the Partnership that are subject to risks of non-compliance with anti-corruption legislation and where there is a high probability of committing corruption offenses both for the purpose of obtaining personal benefits by officials and employees of the Partnership, and obtaining benefits by the Partnership and including them in the Register corruption risks of the Partnership.

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11. Identification of corruption risks and the presence of a real objective view of the existing risks is one of the foundations of effective risk management, contributing to the implementation of the Anti-Corruption Policy in the LLP “FSC of RES”.

12. Each employee of the Partnership on an ongoing basis identifies and evaluates Corruption risks in the Partnership's business processes, including personnel management, transactions, contracts, agreements and contracts.

**3. Risk management**

13. In order to eliminate Corruption risks, the Partnership determines response methods and eliminates them from a more critical to a less critical risk.

14. Corruption risk management is the process of developing and implementing measures to reduce the negative effect and probability of committing a corruption offense by both officials/employees of the Partnership and its counterparties (clients).

15. Structural units / employees of the Partnership related to the formation, conclusion, signing and execution of transactions and contractual relations on an ongoing basis conduct monitoring and other activities aimed at identifying and identifying Corruption risks together with the anti-corruption compliance service (compliance officer) of the Partnership.

16. After making appropriate amendments to regulatory legal acts, all contracts, agreements, contracts and other acts of transactions of the Partnership must have an informing norm on the anti-corruption commitment of the Partnership (anti-corruption clause), as well as require an appropriate anti-corruption culture on the part of all counterparties (clients) and other persons having contractual relations with the Partnership.

Failure to comply with this requirement may serve as a basis for termination of the contract unilaterally by the Partnership, without compensation for any obligations.

17. Avoiding and/or avoiding Corruption risk includes actions aimed at minimizing, controlling and terminating or refusing to carry out operations that are specified in contractual acts and potentially lead to negative consequences.

18. Minimization and control of Corruption risks implies measures aimed at:

1) warning – reduction of the probability of occurrence of a certain risk when concluding transactions, contracts, agreements and Partnership contracts;

2) control – reduction of Corruption risks and/or complete elimination in case of detection, identification and occurrence of such risk;

3) diversification – in cases where it is impossible to completely eliminate Corruption risks, risk distribution among several officials / employees of the Partnership in order to reduce its potential impact.

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2) control – reduction of Corruption risks and/or complete elimination in case of detection, identification and occurrence of such risk;

3) diversification – in cases where it is impossible to completely eliminate Corruption risks, risk distribution among several officials / employees of the Partnership in order to reduce its potential impact.

4. **Procedure for conducting internal**

**analysis of corruption risks**

19. The basis for conducting an internal analysis of corruption risks of the Partnership is the Anti-Corruption Action Plan approved by the Supervisory Board of the Partnership.

20. The decision to conduct an internal analysis of corruption risks is made by the Director General of the Partnership, including on the basis of the results of anti-corruption monitoring conducted in accordance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy in LLP “FSC of RES”.

21. The internal analysis of corruption risks is carried out by the anti-corruption compliance service (compliance officer) together with the working group created by the decision of the General Director of the Partnership (hereinafter referred to as the working group).

By the decision of the General Director of the Partnership, specialists and (or) experts of other anti-corruption entities are involved in the working group.

22. The object of internal analysis of corruption risks is the activity of the structural subdivision of the Partnership (hereinafter referred to as the subdivision) or the Partnership as a whole.

23. The decision to conduct an internal analysis of corruption risks contains the following information:

1) the name of the subdivision whose activities are subject to internal analysis of corruption risks, or the activities of the Partnership as a whole;

2) direction of internal analysis of corruption risks in accordance with paragraph 25 of the Rules;

3) about the structural unit, the official (officials) or the personal composition of the working group that conducts an internal analysis of corruption risks;

4) the period of conducting an internal analysis of corruption risks;

5) about the official of the Partnership, who is entrusted with the management, coordination in cooperation with the anti-corruption compliance service (compliance officer) and responsibility for conducting an internal analysis of corruption risks and the results of work;

6) other organizational issues.

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24. The frequency of conducting an internal analysis of corruption risks is determined by the Partnership, but at least once every eighteen months.

If the authorized anti-corruption body conducts an external analysis of corruption risks in the activities of the Partnership, an internal analysis of corruption risks is carried out after one year from the date of its completion.

25. The internal analysis of corruption risks is carried out in accordance with the Methodological Recommendations for conducting an internal analysis of Corruption risks approved by the Agency of the Republic of Kazakhstan for Combating Corruption dated April 07, 2021, in the following areas:

1) identification of corruption risks in regulatory legal acts and internal regulatory documents affecting the activities of a division or partnership as a whole;

2) identification of corruption risks in the organizational and managerial activities of a division or Partnership as a whole.

26. Regulatory legal acts affecting the activities of a subdivision or a Partnership as a whole identify discretionary powers and norms that contribute to the commission of corruption offenses.

27. The organizational and managerial activities of a subdivision or Partnership as a whole are understood as the following issues:

1) Personnel management, including staff turnover;

2) Conflict of interest resolution;

3) other issues arising from the organizational and managerial activities of the subdivision or the Partnership as a whole.

28. The sources of information for conducting an internal analysis of corruption risks are:

1) Regulatory legal acts affecting the activities of a subdivision or partnership as a whole;

2) Internal regulatory documents of the Partnership affecting the activities of the subdivision or the Partnership as a whole;

3) The results of inspections previously carried out by state bodies in relation to the subdivision or the Partnership as a whole;

4) Publications in the mass media;

5) Appeals of individuals and legal entities received by a division or partnership;

6) Acts of prosecutorial supervision;

7) Judicial acts;

8) other information, the provision of which is allowed by the legislation of the Republic of Kazakhstan.

29. Based on the results of the internal analysis of corruption risks, an analytical report is prepared containing:

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1) Information on identified corruption risks;

2) Recommendations for their elimination;

3) Deadlines for the implementation of the recommendation on the elimination of identified corruption risks.

30. The analytical report is coordinated by the anti-corruption compliance service (compliance officer) and members of the working group, the head of the unit for whose activities the analysis of corruption risks was carried out, and signed by the official specified in subparagraph 5) of paragraph 23 of the Rules.

31. An analytical certificate with recommendations on the elimination of identified corruption risks is submitted to the General Director of the Partnership for consideration and action no later than five working days from the date of signing the analytical certificate by the official specified in subparagraph 5) of paragraph 23 of the Rules.

32. The results of the internal analysis of corruption risks and information on the measures taken to eliminate corruption risks are brought to the attention of the members of the Supervisory Board and posted on the Internet resource of the Partnership, taking into account the secrecy regime, official, commercial or other secrets protected by the law of the Republic of Kazakhstan.

**5. Assessment of identified corruption risks**

33. Identification and assessment of Corruption risks are aimed at providing a common vision of the existing corruption risks and their size by implementing a basic ranking to determine the most "vulnerable" places.

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

34. The process of assessing Corruption risks is carried out in order to identify the most significant (critical) risks that can negatively affect the activities of the Partnership, cause the occurrence of a corruption offense, as with on the part of an official/ employee of the Partnership, as well as on the part of its counterparties and partners.

These risks should be immediately submitted for consideration by the Supervisory Board of the Partnership, based on the results of which decisions are made to eliminate and control these risks.

35. Corruption risks are assessed in terms of the probability or frequency of their occurrence and impact.

The risk level is calculated as follows:

Risk level = probability \* impact

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The risk level is calculated by the anti-corruption compliance service (compliance officer).

Divisions of the Partnership may also be involved in the calculation of risks. 36. The assessment of corruption risks includes consideration of the sources and causes of each risk, the negative consequences of their implementation, and the probability that a certain event will occur.

37. Initially, the assessment of Corruption risks is carried out on a qualitative basis, then a quantitative assessment should be carried out for the most significant of them.

Risks that cannot be quantified, there is no reliable statistical information for their modeling, or the construction of such models is not cost-effective, are evaluated only on a qualitative basis.

38. Corruption risks are classified according to the following criteria for assessing the impact of risks (criteria):

1) an acceptable risk is a risk, as a result of which there is no risk of a corruption offense on the part of the Partnership, its employees and counterparties, within this zone, the Anti–Corruption Policy in LLP “FSC of RES” retains its preventive expediency, i.e. corruption risks occur, but they do not exceed the threshold level.

According to the degree of influence, such a risk is:

Insignificant – if the risk is realized, there are no negative consequences in which there is a minor violation of the requirements of the anti-corruption legislation of the Republic of Kazakhstan, there are no grounds for bringing officials and employees of the Partnership to administrative and/or other liability, fines, penalties, penalties and other financial violations against the Partnership.

There are no violations of the rights and interests of individuals and legal entities;

noticeable - the consequences of the implementation of the risk are insignificant in which there is a small violation of regulatory requirements, there are warnings about the possible collection of fines from officials and employees of the Partnership, receiving warnings about the possible collection of fines, penalties, penalties and the identification of other financial violations in relation to the Partnership.

2) high risk - a risk, in the implementation of which the Partnership faces the commission of a corruption offense, the critical risk zone is characterized by the danger of violating the anti-corruption legislation of the Republic of Kazakhstan, which obviously exceeds the threshold level and, in extreme cases, may lead to criminal and/or administrative liability of an official/employee of the Partnership.

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According to the degree of influence, such a risk is large, in which the consequences of the implementation of the risk are significant, but can be completely corrected - repeated violation of regulatory requirements, which can lead to fines, penalties, penalties and other financial violations, collection of fines from the Partnership, violation of the rights and interests of individuals and legal entities;

3) critical risk is a risk in which conditions arise for the commission of systemic corruption offenses, such risks can reach a magnitude when the system becomes permanent and the involvement of two or more officials / employees of the Partnership.

Also, this group includes any risks associated with a direct danger of embezzlement of state assets.

According to the degree of influence, such a risk is:

critical - the consequences of the implementation of the risk are very significant, but can be corrected to a certain extent.

Serious violation of regulatory requirements, as a result of which the Partnership is obliged to pay fines, penalties, penalties, officials and employees of the Partnership are brought to administrative or criminal responsibility, the rights and interests of individuals and legal entities are violated.

catastrophic - the consequences of the implementation of the risk are very significant and cannot be corrected. The risk has uncompensated consequences.

Extreme violation of regulatory requirements or several financial violations that resulted in large fines, penalties, penalties and other payments, as well as revocation of issued licenses (if any).

Repeated involvement of officials and employees of the Partnership to administrative/criminal and/or other liability. Violation of the rights and interests of individuals and legal entities.

39. All identified, identified and assessed corruption risks in business processes, transactions, contracts, agreements and contracts of the Partnership are reflected in the Register of Corruption Risks, taking into account their ranking and assigning them points based on the results of risk assessment to build a Risk Map.

40. The risk map is a graphic representation of the exposure of a subdivision or Partnership as a whole to identified corruption risks and is compiled by the anti-corruption compliance service (compliance officer) in accordance with Annex 1 to the Rules.

The risk map is divided into several parts, highlighted in different colors:

red zone - risks that are critical and/or catastrophic for the object of analysis, either due to the high probability of occurrence, or due to the serious potential for consequences that may affect the level of corruption in the object of analysis, or due to both factors;

orange zone - risks that have a high probability of occurrence or a large potential impact on the level of corruption in the object of analysis;

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yellow zone - risks that have an average probability of occurrence or an average potential impact on the level of corruption in the object of analysis; green zone - risks that have a low probability of occurrence and (or) do not have a significant impact on the level of corruption in the object of analysis.

41. Based on the Partnership's Risk Map, the relative importance of each risk is assessed (compared to other risks), and the risks that are key and require priority measures and, if necessary, ensuring the distribution of human and financial resources are identified.

**4. Elimination and minimization of corruption risks**

**Development of an action plan to eliminate identified corruption risks**

42. The Anti-Corruption Compliance Service (compliance officer), together with the divisions, within 10 working days from the date of signing the analytical certificate, develop an action plan to eliminate the causes and conditions contributing to the commission of corruption offenses identified by the results of an internal analysis of corruption risks (hereinafter referred to as the action plan, Appendix 2 to the Rules)

43. The measures included in the plan should be specific and sufficient to eliminate the identified corruption risks.

The deadlines for the implementation of measures should be reasonable and not exceed one calendar year from the date after the signing of the analytical certificate.

44. The action plan is approved by the Supervisory Board of the Partnership.

Monitoring the implementation of recommendations

45. The anti-corruption compliance service (Compliance Officer) conducts monitoring of the implementation of recommendations (hereinafter referred to as monitoring) reflected in the analytical report on the results of internal analysis of corruption risks and included in the action plan within one year from the date of approval of the action plan.

46. The structural divisions of the Partnership, quarterly from the date of approval of the plan no later than the fifth day of the month following the reporting period, must send information to the anti-corruption compliance service (compliance officer) on the progress of the implementation of recommendations in accordance with Annex 3 to the Rules with the provision of supporting documents.

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47. The Anti-Corruption Compliance Service (Compliance Officer), upon receipt of full information on the implementation of all recommendations provided for in the action plan and supporting documents, forms the results of monitoring the implementation of recommendations (Appendix 4 to the Rules)

Based on the results of the review of the information, the status of the implementation of each recommendation and the action plan as a whole is determined.

Recommendations are recognized as fully implemented in the event of elimination of the identified corruption risk through the execution of the event in accordance with the completion form specified in the action plan.

The recommendation is recognized as partially fulfilled if the identified corruption risk is not eliminated or minimized to a small extent due to the implementation of the event not in full in accordance with the completion form specified in the action plan.

The recommendation is considered unfulfilled if the identified corruption risk is not eliminated or minimized due to the failure to take measures to implement the action plan item.

The recommendation is deemed to be no longer relevant if it is impossible or inexpedient to carry out the event for objective reasons (changes in legislation, reorganization or abolition of a legal entity, transfer of functions and others that do not depend on

(Partnership reasons).

The results of monitoring the implementation of recommendations are made by the anti-corruption compliance service (compliance officer)

48. In case of non-fulfillment or incomplete fulfillment by the Partnership of recommendations, the Anti-corruption compliance service (compliance Officer) submits relevant information to the Supervisory Board of the Partnership for taking response measures.

In case of non-fulfillment or incomplete fulfillment by the Partnership of recommendations after a year from the date of approval of the action plan for objective reasons, the anti-corruption compliance service (compliance officer) continues monitoring until their final execution. Information on the results of monitoring the action plan is posted on the Partnership's Internet resource.

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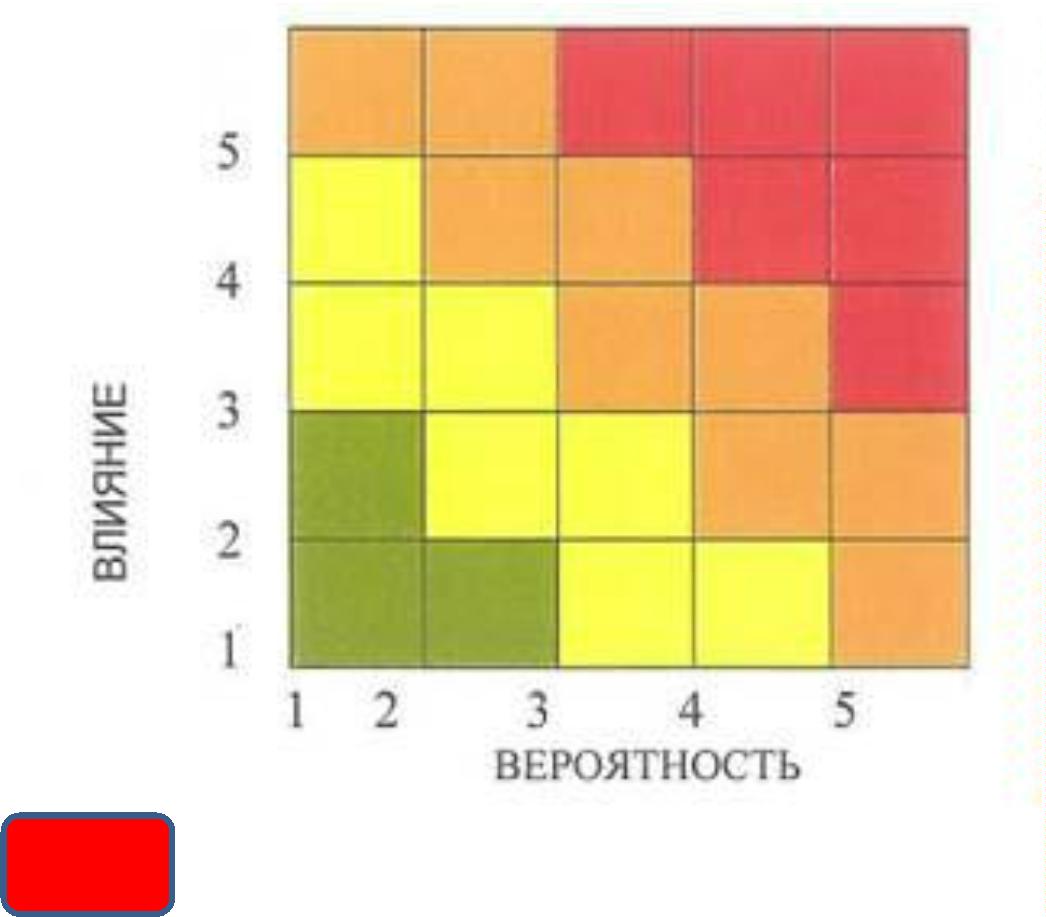
Appendix 1 to the Rules for Conducting Internal Analysis and Identifying Corruption Risks in the LLP «FSC of RE»

Form

ASSESSMENT OF IDENTIFIED CORRUPTION RISKS

Risk level = probability \* impact

**Risk map:**



Assessment of the relative significance of each identified risk

influence

Identification of key risks that require measures to be taken as a priority allocation of human and financial resources

- risks that are critical and/or catastrophic due to the high probability of occurrence, or due to the serious potential for consequences that may affect the level of corruption in the object of analysis, or due to both factors;

probability

– risks that have a high probability of occurrence or a large potential impact on the level of corruption in the object of analysis;

– risks that have an average probability of occurrence or an average potential impact on the level of corruption in the object of analysis;

– risks that have a low probability of occurrence and (or) do not have a significant impact on the level of corruption in the object of analysis.

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Appendix 2 to the Rules for Conducting Internal Analysis and Identifying Corruption Risks in the

LLP «FSC of RE»

Form

**Action plan to eliminate the causes and conditions contributing to the commission of corruption offenses identified by the results**

**of an internal analysis of corruption risks in the** **LLP «FSC of RE»**

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(name of the object of analysis)

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| № | Recommendations based on  the results of the internal analysis of corruption risks | Completion Event | Form | Responsible performers | Execution period |
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Appendix 3 to the Rules for Conducting Internal Analysis and Identifying Corruption Risks in the LLP «FSC of RE»

Form

**Information on the implementation of recommendations made based on the results of an internal analysis of corruption risks**

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| № | Recommendations based on  the results of the internal analysis of corruption risks | Form of completion according to the action plan | Information on the execution |
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Appendix 4 to the Rules for Conducting Internal Analysis and Identifying Corruption Risks in

the LLP "FSC of RE"

Form

**The results of monitoring the implementation of recommendations**

**by the object of internal analysis of corruption risks**

Name of the object of internal analysis of corruption risks:

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Analysis period: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of signing of the analytical report: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

In total, \_\_\_\_ recommendations were made.

Of which:

executed in full - \_\_\_\_\_\_\_; partially executed - \_\_\_\_\_\_\_\_;

not executed - \_\_\_\_\_\_\_;

lost relevance - \_\_\_\_\_\_.

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| № | Recommendations based on  the results of the internal  analysis of corruption  risks | Form of completion according to the action plan | Information on the execution | Assessment of the person authorized to conduct an internal analysis |
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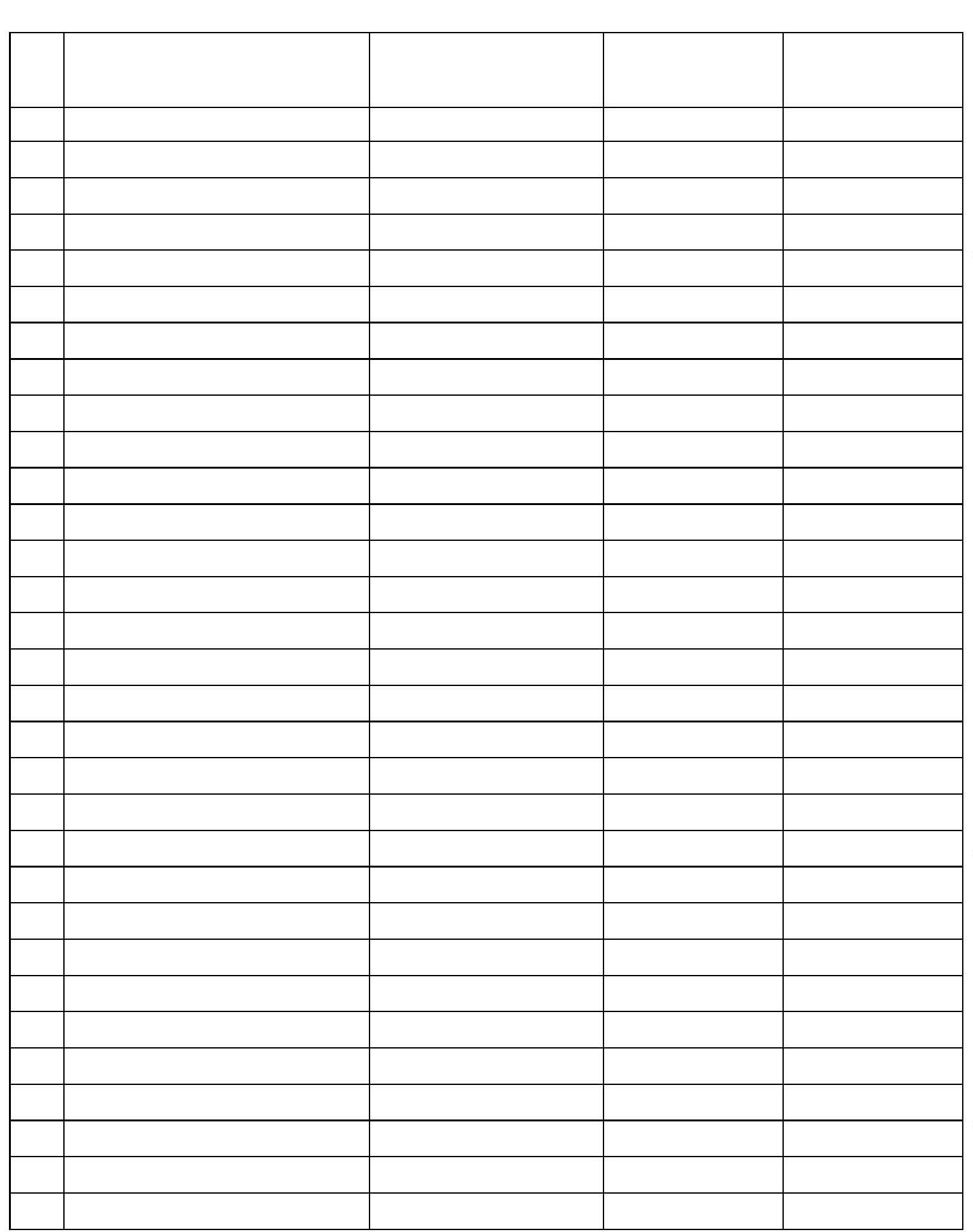
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**Approval Sheet**

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| № | Position | Full name | Date | Signature |
|  | General Director of LLP "FSC of RE" | Nalibaeva G.К. |  |  |
|  | Director of the Department  of Legal Support and Administrative Support of LLP "FSC of RE" | Baktygalieva Е.V. |  |  |
|  | Compliance Officer of Anti-Corruption Compliance Service | Mukusheva M.Sh. |  |  |

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**The List of Familiarization**



№ Position Full name Date Signature