

Annex 2 to the Solution of Supervisory board of
«FSC of RES» LLP November 02, 2022 (protocol №4)

APPROVED
by the Solution of Supervisory board of
«FSC of RES» LLP November 02, 2022 (protocol №4)

Anti-Corruption Action Plan for 2022

(within the framework of the implementation of the group of draft model basic directions)

№	Name of action items	Form of Completion	Completion date	Responsible for execution
1.	Development and submission for approval of the Anti-corruption Policy in «FSC of RES» LLP	Solution of Supervisory board	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
2.	Familiarization of officials and employees of the Partnership with the Anti-corruption Policy of «FSC of RES» LLP	Acknowledgement list	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
3.	Ensuring the adoption of anti-corruption restrictions by all persons equivalent to persons authorized to perform governmental functions	Register	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)

4.	Completion of Confirmation and Declarations of Conflict of Interest by Officials and Employees of «FSC of RES» LLP (hereinafter referred to as the Partnership)	Confirmation and Declarations of Conflict of Interest	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
5.	Familiarization with the personal files of officials Personal files of the Partnership's officers and employees whether there are any facts of hiring persons who have previously committed corruption offenses	Reference	november - december	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
6.	Developing and submitting for approval the Instruction on combating corruption and Commercial bribery in «FSC of RES» LLP	Solution of Supervisory board	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
7.	Familiarization of officials and employees of the Partnership with the Instruction on combating corruption and Commercial bribery in «FSC of RES» LLP	Acknowledgement list	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
8.	Formation of the Register of Gifts and Acts of hospitality	Register	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)

9.	Development and submission for approval of Anti-Corruption Standards of «FSC of RES» LLP	Solution of Supervisory board	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
10.	Familiarization of officials and employees of the partnership with the Anti-Corruption Standards of «FSC of RES» LLP	Acknowledgement list	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
11.	Fulfilling the Obligation by officials and employees of the Partnership to fulfill the Anti-Corruption Standards of «FSC of RES» LLP	Obligation to fulfill the Anti-Corruption Standards of «FSC of RES» LLP	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
12.	Development and submission for approval of the conflict of interest settlement policy of «FSC of RES» LLP	Solution of Supervisory board	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
13.	Familiarization of officials and employees of the partnership with the policy of resolving conflicts of interest of «FSC of RES» LLP	Acknowledgement list	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)

14.	Formation of the Register for Registration of Statements on the existence of a conflict of interest or a situation that may lead to a conflict of interest	Register	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
15.	Development and submission for approval of rules for internal analysis and identification of corruption risks in «FSC of RES» LLP	Solution of Supervisory board	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
16.	Familiarization of officials and employees of the partnership with the rules for conducting internal analysis and identification of corruption risks of «FSC of RES» LLP	Acknowledgement list	november	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
17.	Analysis of the activities of the partnership for protest and lawsuit work in order to identify corruption risks	Reference	november - december	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
18.	Development and submission for approval of the Code of Business Ethics of «FSC of RES» LLP	Solution of Supervisory board	november	General director (Nalibayeva G.K.)
19.	Familiarization of officials and employees of the partnership with the Code of Business Ethics of «FSC of RES» LLP	Acknowledgement list	november	General director (Nalibayeva G.K.)

20.	Filling in by the Partnership's officials and employees of the Partnership of the form confirming adherence to the principles of business ethics and rules of behavior established by the Code of Business Ethics of «FSC of RES» LLP	Confirmation	november	General director (Nalibayeva G.K.)
21.	Placement on the Partnership's Internet resources the information about measures taken to combat corruption and internal regulatory documents approved by the Partnership on the issues of combating corruption and business ethics	Information published on internet-resource	november - december	General director (Nalibayeva G.K.) Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
22.	Conducting explanatory and training Activities for the Partnership's employees on Compliance with the requirements of anti-corruption legislation and approved internal regulatory documents on anti-corruption issues	Reference	november - december	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
23.	Provision of registration of affiliated persons of the Partnership and its officers, in according to requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Partnership	Established database of affiliated persons	december	General director (Nalibayeva G.K.)

24.	Processing of reports on corruption and other violations received by the anti-corruption compliance service (compliance officer)	Register, Reference	november - december	Compliance officer of Anti-Corruption Compliance service (Mukusheva M.Sh.)
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