

APPROVED  
by the Solution of Supervisory board of  
«FSC of RES» LLP  
January 31 – February 01, 2023 (protocol №1)

**Anti-Corruption Action Plan of «FSC of RES» LLP for 2023**

<b>№</b>	<b>Name of action items</b>	<b>Form of Completion</b>	<b>Completion date</b>	<b>Responsible for execution</b>
1.	Implementation of measures to eliminate the identified corruption risks based on the results of the analysis of the Partnership's activities in December 2022 in claims and lawsuit work for the purpose of identification of corruption risks (as per a separate plan)	information on execution progress reported to the ACCS with confirming documents	Every 3 months, not later than the 5th day of the month following by reported quarter	General director (Nalibayeva G.K.)
2.	Monitoring of the implementation of the recommendations of the analysis of the Partnership's claims and litigation activities conducted in December 2022 to identify corruption risks	placement of information on monitoring results on internet resource	Every 3 months, within five business days from the date of receipt of information	Compliance officer (Mukusheva M.Sh.)
3.	Ensuring that newly hired employees are familiarized with internal anti-corruption documents, and that they submit declarations, confirmations, and accept anti-corruption restrictions and obligations	reference	at yearend	Compliance officer (Mukusheva M.Sh.)
		submission a copy of confirming documents to the ACCS	as new hires are made	General director (Nalibayeva G.K.)

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4.	Monitoring of recruitment of persons who have previously committed corruption offenses	reference	at yearend	Compliance officer (Mukusheva M.Sh.)
		submission a copy of confirming documents to the ACCS	as new hires are made	General director (Nalibayeva G.K.)
5.	Conducting explanatory and training events for the Partnership's employees on compliance with the requirements of anti-corruption legislation and approved internal regulatory documents on anti-corruption issues	reference (protocols)	throughout the year, monthly	Compliance officer (Mukusheva M.Sh.)
6.	Conduct anonymous anti-corruption surveys/ tests/ interrogations	reference	throughout the year	Compliance officer (Mukusheva M.Sh.)
7.	Implementation of measures to introduce ISO 37001 or ST RK 3049-2017 standards into the Partnership (as per individual plan)	report	within six months from the date of conclusion of the contract, but no later than August	General director (Nalibayeva G.K.)
8.	Carrying out certification audit for the Partnership to obtain international certification for compliance with the requirements of the international standard ISO 37001:2016	certification of the Partnership	during the second half of the year, starting from August	General director (Nalibayeva G.K.)

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9.	Training of at least 20% of employees of the partnership according to ISO 37001 or ST RK 3049-2017 standards or other training programs on anti-corruption compliance	certificates	february	General director (Nalibayeva G.K.)
10.	Conducting thematic anti-corruption monitoring to assess law enforcement practices on anti-corruption issues in the development of the IND	analytic report (reference)	march	Compliance officer (Mukusheva M.Sh.)
11.	Development of the IND and (or) amendments/additions to the IND on anti-corruption issues and other areas of the Partnership's activities	solution of Supervisory board	april-may	Compliance officer (Mukusheva M.Sh.)
12.	in order to bring them in accordance with the requirements of anti-corruption legislation (if required)	order of GD		General director (Nalibayeva G.K.)
13.	Make changes/additions to internal normative documents and other documents of the Partnership, aimed at conducting a legal examination of the adopted internal documents of the Partnership in order to prevent corruption factors and discretionary powers of officials discretionary powers of officials, which may create prerequisites for committing unlawful actions of a corrupt and other unlawful nature	order of GD (regulation on SD, job instructions, IND)	april-may	General director (Nalibayeva G.K.)

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14.	Develop proposals to exclude sole contacts of individuals and legal entities with officers and employees of the Partnership while performing their functions	proposals to GD	may	Compliance officer (Mukusheva M.Sh.)
15.	Implementation (creation and operation) of a dedicated hotline on corruption, ethical and other violations	order of GD	june	General director (Nalibayeva G.K.)
16.	Development and submission for approval of the initiative informatization policy in the partnership	solution of Supervisory board	as the «hotline» is implemented	Compliance officer (Mukusheva M.Sh.) General director (Nalibayeva G.K.)
17.	Providing information regarding the means of communication tools for reporting the existence or suspected existence of corruption related, ethical and other violations	reference, information on internet resource	as the «hotline» is implemented	Compliance officer (Mukusheva M.Sh.) General director (Nalibayeva G.K.)
18.	Conducting thematic anti-corruption monitoring to assess law enforcement practices on anti-corruption issues in personnel management	analytic report (reference)	june	Compliance officer (Mukusheva M.Sh.)
19.	Development of the IND and/or inclusion amendments/additions to the IND on issues of combating corruption in human resources management (if necessary)	solution of Supervisory board, order of GD	july –august	General director (Nalibayeva G.K.)

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20.	To notify the officials and employees, as well as their spouses on timely submission of asset and liability/income and property declarations and control over provision of supporting documents to be kept in employees' personal files	information submitted to ACCS	july –september	General director (Nalibayeva G.K.)
		reference	at yearend	Compliance officer (Mukusheva M.Sh.)
21.	Conducting thematic anti-corruption monitoring to assess law enforcement practices on anti-corruption issues in conflict of interest settlement	analytic report (reference)	september	Compliance officer (Mukusheva M.Sh.)
22.	Development of the IND and/or inclusion amendments/additions to the IND on issues of combating corruption in conflict of interest settlement	order of GD, solution of SB (if required)	october	General director (Nalibayeva G.K.)
23.	Carrying out thematic anti-corruption Monitoring in order to assess law enforcement practice on the issues of anti-corruption to ensure transparency and openness of the Partnership's activities	analytic report (Reference)	november	Compliance officer (Mukusheva M.Sh.)
24.	Development of the IND and/or inclusion amendments/additions to the IND on issues of combating corruption in ensuring transparency and openness of the Partnership's activities	Order of GD	december	General director (Nalibayeva G.K.)
25.	Publication of information on anti-corruption measures taken by the partnership on Internet resources	information on internet resource	as actions are taken	Compliance officer (Mukusheva M.Sh.)

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26.	Creation of a separate section on the Partnership's Internet resource named "Anti-corruption issues" to ensure wide access of the public to the Partnership's information on measures taken by the Partnership to combat corruption	section on internet resource	december	General director (Nalibayeva G.K.)
27.	Processing of reports on corruption and other violations received by the ACCS via e-mail <a href="mailto:compliance@rfc.kz">compliance@rfc.kz</a> and hotline (after its implementation)	Register, Reference / Result	as reported	Compliance officer (Mukusheva M.Sh.)

**Note:** acronym's meaning:

ACCS – Anti-corruption Compliance Service

IND – Internal Normative Documents of the Partnership

GD/General director – General Director of the Partnership

SB – Supervisory Board of the Partnership

SD – Structural Department

Partnership – «FSC of RES» LLP

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