 KazTransOil	KazTransOil JSC	
Name of the IMS document	Regulations on anti-corruption monitoring and internal analysis of corruption risks in KazTransOil JSC	
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Developed by: Compliance Control Service	Approved by the resolution of the Management Board of KazTransOil JSC (Minutes of the meeting dated _____, 2023 No._____)	

1. GENERAL

1. These Regulations define a unified procedure for anti-corruption monitoring and internal analysis of corruption risks in KazTransOil JSC (the Company).

2. The objectives of these Regulations are:

- 1) obtaining objective data on the status, effectiveness and efficiency of anti-corruption measures in the Company;
- 2) identification and forecasting of key areas for improving the effectiveness of anti-corruption activities and creating an effective system for protecting the interests of Company in all areas of activity;
- 3) development and implementation of comprehensive and consistent measures to prevent and suppress corruption, eliminate their causes;
- 4) formation of an anti-corruption culture among the Company's employees based on the principles of legality, honesty, integrity and transparency in the performance of their duties.

2. SCOPE


3. The requirements of these Regulations apply to all business units of the Company involved in the process of conducting anti-corruption monitoring and internal analysis of corruption risks in the Company.

3. TERMS, DEFINITIONS AND ABBREVIATIONS

4. For the purposes of these Regulations, the concepts used in the Law of the Republic of Kazakhstan "On Anti- Corruption" [1], as well as the following terms, definitions and abbreviations are used:

1) **Anti-corruption monitoring** means thematic anti-corruption monitoring conducted by the Company in accordance with the Law of the Republic of Kazakhstan "On Anti-Corruption" [1], the Rules of Anti-corruption monitoring [2], whereby the Company collects, processes, summarizes, analyzes and evaluates information related to the effectiveness of anti-corruption policy, the state of law enforcement practice of the Company in in the field of anti-corruption;

2) **Internal analysis of corruption risks** means identification and study of the causes and conditions contributing to the commission of corruption offenses in Company;

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3) **Discretionary power** means the power of a person whose content makes it impossible to determine the limits of that power;

4) **Responsible business unit** means a business unit of the Company's central office responsible for the organization of anti-corruption measures in the Company and monitoring the implementation of anti-corruption measures;

5) **Working group** means a working group created by Order of the General Director (Chairman of the Management Board) of the Company or a person replacing him/her for internal analysis of corruption risks, which must include employee(s) of the Responsible Business Unit;

6) **Business unit of the Company** - means a division of the Company responsible for the implementation of a certain process and included in the structure of the Company.

4. PROCESS DESCRIPTION

4.1. Anti-corruption monitoring

5. The task of anti-corruption monitoring is to study problematic issues that contribute to corruption in the Company.

6. Anti-corruption monitoring is carried out by the Responsible Business Unit in accordance with the work plan of the Responsible Business Unit for the corresponding year, approved by the decision of the Board of Directors of the Company, in the following order:

1) collection and generalization from open sources of information provided for in paragraph 7 of this Regulation;

2) Examining and analyzing the information collected;

3) identification of problematic issues contributing to manifestations of corruption in the Company;

4) forming the result of anti-corruption monitoring with development of proposals to improve the efficiency of the Company's anti-corruption activities.

7. Sources for anti-corruption monitoring are:

1) data from legal statistics bodies;

2) appeals from individuals and legal entities on anti-corruption issues;


3) Information from non-governmental and international organizations;

4) data from sociological surveys on anti-corruption issues;

5) publications in the mass media;

6) other sources of information not prohibited by the legislation of the Republic of Kazakhstan.

8. The results of anti-corruption monitoring shall be formalized in accordance with Annex 1 to these Regulations.

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4.2. Internal analysis of corruption risks

9. The object of internal analysis of corruption risks is the activities of the Company's business units.

10. Internal analysis of corruption risks shall be conducted based on the principles:

- 1) objectivity;
- 2) reliability;
- 3) transparency;
- 4) comprehensiveness.

11. Internal analysis of corruption risks is carried out in the following areas:

1) identification of corruption risks in the Company's internal documents affecting the activities of the Company's business units that are the Object of analysis;

2) identification of corruption risks in the organizational and management activities of the Company's business units that are the Object of analysis.


12. The Company's internal documents affecting the activities of the Company's business units shall identify discretionary powers and norms facilitating the commission of corruption offenses.

13. Organizational and management activities of the Company's business units shall mean the following issues:

- 1) personnel management, including the identification of positions subject to corruption risks;
- 2) conflict of interest settlement;
- 3) provision of services according to types of the Company's activities;
- 4) development and distribution of financial resources;
- 5) conclusion of contracts with individuals and legal entities;
- 6) development and operation of information systems;
- 7) organizing and conducting purchases of goods, works and services;
- 8) other issues arising from the organizational and managerial activities of the Company's business units.

14. Internal analysis of corruption risks is carried out at least 1 (one) time per year. If the authorized anti-corruption body conducts an external analysis of corruption risks in the Company's activities, it is recommended to conduct an internal analysis of corruption risks after 1 (one) year from the date of its completion.

15. The basis for conducting an internal analysis of corruption risks is the decision of the General Director (Chairman of the Management Board) of the Company or the person replacing him/her. The decision to conduct an internal analysis of corruption risks is formalized in the form of an Order and is based, inter alia, on the results of anti-corruption monitoring.

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16. Depending on the number of functions implemented by the Company's business units and their staffing levels, internal analysis of corruption risks shall be performed by the Responsible business unit or the Working Group.

17. The Order on conducting an internal corruption risk analysis shall contain the following information:


- 1) name of the Company's business units whose activities are subject to internal corruption risk analysis (the Object of Analysis);
- 2) direction(s) of internal analysis of corruption risks;
- 3) the Responsible Business Unit or the personal composition of the Working Group members who will conduct the internal analysis of corruption risks;
- 4) the period covered by the internal corruption risk analysis;
- 5) the deadline for conducting an internal analysis of corruption risks. An internal analysis of corruption risks is carried out within a period not exceeding 30 (thirty) business days. If necessary, the specified period may be extended by 15 (fifteen) business days by Order of the General Director (Chairman of the Management Board) of the Company or a person replacing him/her;
- 6) Full name of the Company's employee charged with management, coordination and responsibility for internal analysis of corruption risks and results of the work;
- 7) work plan for internal analysis of corruption risks developed in the form according to Annex 2 to these Regulations.

18. Conducting an internal corruption risk analysis includes the following stages:

- 1) collection and analysis of information on the Object of analysis in accordance with the area(s) of internal corruption risk analysis;
- 2) identification of positions exposed to corruption risks and formation of a list of such positions;
- 3) preparation of an analytical report based on the results of the internal analysis of corruption risks in accordance with paragraphs 21 and 22 of these Regulations;
- 4) taking measures to eliminate corruption risks in accordance with the approved action plan to eliminate the causes and conditions contributing to the commission of corruption offenses identified by the results of the internal analysis of corruption risks, developed in accordance with paragraph 24 of these Regulations.

19. Sources of information for internal analysis of corruption risks are:

- 1) legal acts, internal documents of the Company, affecting the activities of the Object of analysis;
- 2) data from information systems of state and law enforcement agencies on the Company's activities;
- 3) the results of inspections previously conducted by state and regulatory authorities/organizations in relation to the Company;

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- 4) the results of the audits conducted by the internal audit services of the Company/NC KazMunayGas JSC/Samruk-Kazyna JSC;
- 5) results of anti-corruption monitoring;
- 6) the results of an earlier internal analysis of corruption risks;
- 7) publications in the mass media;
- 8) appeals from individuals and legal entities received by the Company;
- 9) the results of the survey (interview) of the Company's employees;
- 10) information on identification and bringing to responsibility of the Company's employees for committing corruption offenses;
- 11) other information not prohibited by the legislation of the Republic of Kazakhstan.

20. Employees of the Object of analysis present to the Responsible business unit/the sources of information provided for in paragraph 19 of these Regulations explain to the Working Group the practice of applying the norms of the legislation of the Republic of Kazakhstan affecting the activities of the Object of Analysis, report on the existing corruption risks, develop proposals for improving legislation and law enforcement practice on anti-corruption issues.

21. Based on the results of the internal analysis of corruption risks, the Responsible Business Unit/Working Group shall prepare an analytical report in the form according to Annex 3 to these Regulations, which shall contain:


- 1) information on identified corruption risks;
- 2) recommendations on the elimination of identified corruption risks;
- 3) a list of positions subject to corruption risks, determined based on the results of the internal analysis of corruption risks, in the form according to Annex 4 to these Regulations.

22. Analytical Report:

- 1) is coordinated by all employees of the Responsible business unit/members of the Working Group who conducted an internal analysis of corruption risks;
- 2) signed by an employee of the Company specified in paragraph 17(6) of these Regulations.

23. A summary of the analytical report based on the results of the corruption risk analysis indicating the emergence of new corruption risk(s) of the Company and/or actions (inaction) of the Company's employees entailing the possibility of a corruption offense shall be submitted by the Responsible Business Unit to the Company's Board of Directors immediately after summarizing the results of the analysis.

24. The responsible business unit/working group shall develop an action plan to eliminate the causes and conditions contributing to the commission of corruption offenses identified by the results of the internal analysis of corruption risks (the Action Plan) in the form according to Annex 5 to these Regulations. The Action Plan Is approved by the General Director (Chairman of the Management Board) of the

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Company or a person replacing him/her, no later than 10 (ten) business days from the date of signing the analytical report.

25. Within 3 (three) business days from the date of the Action Plan approval, the Analytical Report and the Action Plan shall be posted by the Responsible Business Unit on the Company's website taking into account the requirements for protection of official, commercial or other secrets protected by law of the Republic of Kazakhstan.

26. The responsible business unit shall monitor the implementation of the Action Plan within 1 (one) year from the date of signing the analytical report and submit the reporting information to the General Director (Chairman of the Management Board) of the Company.

Information on the implementation of recommendations made following the results of the internal analysis of corruption risks shall be posted by the Responsible Business Unit on the Company's website at least once every six (6) months, subject to compliance with the requirements for the protection of official, commercial or other secrets protected by law of the Republic of Kazakhstan.

5. RESPONSIBILITY


27. The responsible business unit/Working Group shall be responsible for carrying out the activities stipulated by these Regulations.

28. The Object of analysis is responsible for the timely and complete provision of information within the framework of the request of the Responsible business unit/the Working Group in conducting an internal analysis of corruption risks, as well as for the implementation of the approved Action Plan.

6. REFERENCES*


[1]	The Law of the Republic of Kazakhstan dated November 18, 2015 "On Anti-Corruption"
[2]	The rules of anti-corruption monitoring approved by the Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated January 28, 2020 No. 22

*When using these Regulations, it is advisable to check the validity of the reference documents. If the reference document is replaced (amended), the replaced (amended) document should be used when using these Regulations. If a reference document is canceled without replacement, the provision referring to it applies to the extent that the reference is not affected.

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7. ANNEXES

Annex 1 (required)	Form of analytical report following the anti-corruption monitoring results
Annex 2 (required)	Form of the Work Plan for Internal Analysis of Corruption Risks
Annex 3 (required)	Form of Analytical Report following the Internal Analysis of Corruption Risks
Annex 4 (required)	Form of the list of positions subject to corruption risks identified following an internal analysis of corruption risks
Annex 5 (required)	Form of an Action Plan for Elimination of Causes and Conditions Contributing to Corruption Offenses Identified by Internal Analysis of Corruption Risks

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Annex 1
(required)

Analytical report following the anti-corruption monitoring

I. Introductory section

1. Name of the quasi-public sector entity whose activities were subject to anti-corruption monitoring:

2. Anti-corruption monitoring has been conducted:

(business unit)

(position, full name of Director, e-mail address, phone number)

3. Period of anti-corruption monitoring:
started _____ completed _____.

II. Information and analytical part

Quantitative and qualitative indicators describing the state and causes of corruption in the activities of KazTransOil JSC.

III. Final section


Conclusions. Quantitative and/or qualitative indicators to measure the effectiveness of anti-corruption enforcement practices and a solution that includes:

- 1) assessment of the effectiveness of anti-corruption measures and proposals to improve the effectiveness of KazTransOil JSC in anti-corruption activities;
- 2) recommendations on the corruption risk analysis in the activities of KazTransOil JSC.

(position)

(signature) (surname, initials of first name and patronymic)


_____, 20__

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Annex 2
(required)

Work plan for conducting an internal analysis of corruption risks

s/i	Types of work	Deadline	Responsible persons

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Annex 3
(required)

Analytical Report on the results of the internal analysis of corruption risks

for _____
(period covered by the internal corruption risk analysis)

(business unit)

In order to identify and study the causes and conditions contributing to the commission of corruption offenses, in the period from _____ to _____ 20____

(name of business unit/working group)

on the basis of _____
(details of the Order on conducting an internal analysis of corruption risks)

an internal analysis of corruption risks in relation to _____
(business unit)


1. Information on identified corruption risks:

- 1) identification of corruption risks in the internal documents of KazTransOil JSC, affecting the activities of business units of KazTransOil JSC;
- 2) identification of corruption risks in the organizational and managerial activities of KazTransOil JSC.

2. Recommendations to eliminate the identified corruption risks.

(position) _____
(signature) (surname, initials of first name and patronymic)

_____, 20____

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Annex 4
(required)

**The list of positions
exposed to corruption risks identified following an internal analysis of
corruption risks**

The name of the object of internal analysis of corruption risks:

(Business unit/activity of Business unit (business process(s)))

Position exposed to corruption risk	Official powers containing corruption risks	Corruption risks	Level of corruption risks

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Annex 5
(required)

Approved by
General Director
(Chairman of the
Management Board)
KazTransOil JSC

_____, 20__

Action Plan for Eliminating Causes and Conditions Contributing to the Commitment of Corruption Offenses Identified by the Internal Analysis of Corruption Risks in

(name of the Object of analysis)

s/i	Recommendation	Activity	Completion Form	Responsible performers	Due dates
1	2	3	4	5	6

(position) _____
(signature) (surname, initials of first name and patronymic)