



Compliance and handling of inquiries

GRI 2-24 | GRI 3-3 | SASB

The Compliance Service of the Fund ensures compliance with the anti-corruption legislation of the Republic of Kazakhstan and is engaged in the development of the compliance program:

- coordinates the activities of the compliance services of portfolio companies,
- organizes communication and training,
- supports the operation of the Hotline,
- conducts inspections and investigations,
- interacts with third parties,
- identifies and resolves conflicts of interest,
- develops other aspects of compliance in the Fund's Group of Companies.

The Compliance Service is guided by the Regulations on the Compliance Service, the Republic of Kazakhstan's anti-corruption legislation, and best international practices in the fields of compliance and anti-corruption.

During 2023, the Compliance Service worked on developing and improving the regulatory and methodological framework. In particular, the Fund's Code of Conduct was updated, and the Strategy for the Development of the Compliance Function in the Fund's Group of Companies for 2023-2027 was approved.

The Corporate Standard for the compliance function of the Fund's Group of Companies, which regulates compliance activities in the Fund's portfolio companies, has been completely revised. The Standard provides guidelines for creating a compliance function and developing, implementing, evaluating, maintaining, and improving an effective compliance system.

An internal audit, «Analysis of the activities of the Compliance Service," was conducted to assess the effectiveness of the anti-corruption system in the Fund, taking into account compliance with the requirements of anti-corruption legislation and the requirements of ISO 37001 standard. The effectiveness of the conflict of interest control system was assessed, and the procedure for verifying the reliability of counterparties, including foreign ones, for sanctions risks was analyzed. [GRI 3-3](#)

Appeals may be submitted by all persons in Russian, Kazakh and English languages through the following communication channels:

by phone number



8 800 080 4747

(The call is free of charge within the Republic of Kazakhstan)

by e-mail



mail@sk-hotline.kz

via the Internet portal



www.sk-hotline.kz

via WhatsApp messenger with the number



+7 771 191 8816

In order to ensure confidentiality and anonymity, all appeals are received and processed by an external independent Operator, who transmits information on received appeals to the Compliance Service on a daily basis.

DURING THE REPORTING PERIOD, CORRUPTION AND OTHER RISKS WERE ASSESSED IN MORE THAN 46% OF SUBSIDIARIES AND AFFILIATES OF THE FUND'S PORTFOLIO COMPANIES.

[GRI 205-1](#)

In 2023, the Compliance Service held activities to increase employees' awareness about the Hotline's work. Videos, posters, and screensavers with Hotline contacts are posted in public places continuously. [GRI 2-25](#), [GRI 2-24](#) Explanatory work and popularization of the hotline are being carried out to increase the culture of reporting violations, including with the involvement of senior management of companies. The operator of the Hotline is an independent company in relation to the Fund, which ensures the proper level of confidentiality and anonymity of the applicant.

The Compliance Service has automated the review of requests received by the Hotline and the verification of the reliability of counterparties. [GRI 2-26](#)

In 2023, the Hotline received 540 applications, almost half related to labor conflicts. Of the total number of applications received in 2023, confirmed and partially confirmed – 174 or 32% of the total number of applications for the year. Among partially confirmed appeals, there are 2 cases partially related to discrimination, which were considered by the organization and referred to subsequent instances. However, there were no confirmed cases of discrimination.

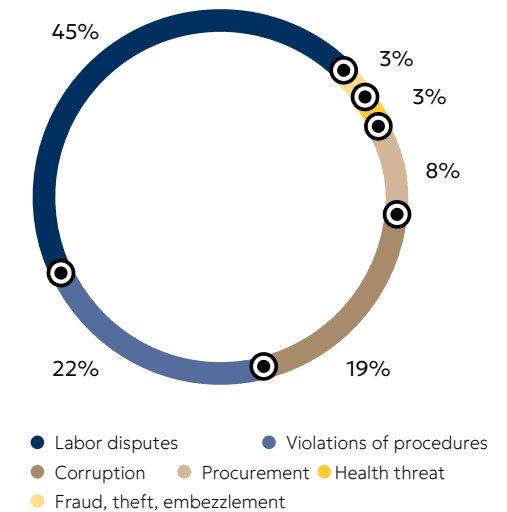
Based on incoming requests, we consider emerging or potential negative impacts on society and take the necessary corrective actions. [GRI 2-25](#) The compliance officers of the Fund's group of companies receive all appeals from the hotline operator in real-time.

The effectiveness of complaint mechanisms is assessed through the efficiency of work on confirmed complaints. Interested parties can submit suggestions, questions, or complaints through established communication channels. [GRI 2-25](#)

The compliance officers of the Fund's group of companies receive all appeals from the hotline operator in real-time.

540

Types of calls to the Hotline



THE COMPLIANCE OFFICERS OF THE FUND'S GROUP OF COMPANIES RECEIVE ALL APPEALS FROM THE HOTLINE OPERATOR IN REAL-TIME.

In the medium term, effective and close cooperation with the anti-corruption Service, financial monitoring bodies, and the Prosecutor's office is planned to ensure transparency of the Fund's activities.