

## **INFORMATION**

### **on the results of an internal analysis of corruption risks in the activities of the Human Resources Management Department**

**Ekibastuz**

**May 22, 2024**

In order to implement paragraph 5 of Article 8 of the Law of the Republic of Kazakhstan "On Combating Corruption" in the Department of Human Resources Management (hereinafter - HRM) Ekibastuzskaya GRES-1 named after B.Nurzhanov LLP (hereinafter referred to as the Partnership) conducted an internal analysis of corruption risks (hereinafter referred to as IACR) aimed at identifying and studying the causes and conditions conducive to the commission of corruption offenses.

**The analyzed period is from January 01, 2021 to December 31, 2023.**

**The period of the event is from April 12 to May 28, 2024.**

During the IACR, an analysis of internal regulatory documents regulating the activities of the HRM was carried out, as well as an analysis of organizational and managerial activities for the presence of corruption risks.

According to the results of the IACR, the following corruption risks were identified in the activities of the HRM:

- the use of the enterprise's standard "Personnel Policy of EGRES-1 LLP", approved by the General Director on 29.09.2014, while the standard on personnel policy should be updated to comply with the Personnel Policy of Samruk-Energo JSC for 2018-2028.;
- hiring employees in the Partnership who do not meet the qualification requirements;
- the current Regulations on the search and selection of personnel of the Partnership, approved by the General Director of the Partnership on 12/19/2023, do not regulate the procedure for forming interview questions (the number and nature of questions, the unit responsible for developing questions, etc.), as well as responsibility for their disclosure to third parties, also in this provision there are technical typos and inconsistencies;
- the presence of extended discretionary powers of the General Director of the Partnership in resolving the issue of monthly bonus payments to employees who have a disciplinary penalty;
- the absence of developed internal regulations regulating the procedure for imposing and early removal of disciplinary penalties from Station employees for committing a disciplinary offense, as well as the procedure for the formation and work of the disciplinary commission;
- the Regulations on the training and development of administrative and managerial personnel, planning of work on training, retraining, advanced training and regular re-certification of employees, approved by the General Director of the Partnership dated 07/03/2021, do not regulate the procedure in which cases, upon dismissal, an employee is released from the obligation to reimburse training costs;
- the Regulations on the search and selection of personnel of Ekibastuzskaya GRES-1 LLP, approved by the General Director of the Partnership on 12/19/2023, do not provide specific and exhaustive grounds on the basis of which the security service checks for negative information regarding candidates and issues a conclusion;
- This Regulation on the formation of the personnel reserve does not provide for norms on the age limit for staying in the personnel reserve, on not enrolling employees in the personnel reserve in the presence of an outstanding disciplinary penalty. Also, the work of the Commission on the development of the personnel reserve has not been regulated (terms of office of Commission members, criteria and requirements for members, procedures for rotation or revision of the composition of the Commission within a clearly defined period, norms excluding conflicts of interest on the part of Commission members, etc.);
- the Regulations on the certification of employees, approved by the decision of the Board of JSC Samruk Energy dated 02/01/2018, do not regulate the work of the certification Commission

(terms of office of Commission members, criteria and requirements for them, procedures for rotation or revision of the composition of the Commission within a clearly defined period, - norms excluding conflicts of interest on the part of Commission members, etc.) Also, in this Regulation on the certification of employees, there are norms that expand the discretionary powers of the General Director.

During the IACR, a number of recommendations were developed to eliminate the above-mentioned identified corruption risks and improve the effectiveness of the internal processes of organizing the activities of the HRM.

**Compliance Officer**

**N. Tashenov**