

The Results of the Internal Analysis of Corruption Risks for 2025

In accordance with the Law of the Republic of Kazakhstan “*On Combating Corruption*”, the relevant subordinate regulatory legal acts, as well as the 2025 Work Plan of the Compliance Service, an internal analysis of corruption risks was conducted at **JSC NC “KazMunayGas”**.

The analysis was carried out on the basis of the Order of the Chairman of the Management Board dated **21 October 2025 No. 304** and covered the key areas of the Company’s organizational, managerial, and financial-economic activities.

During the analysis, an assessment of the existing business processes, internal procedures, and control mechanisms was conducted in order to identify factors that could create conditions for the emergence of corruption risks. As a result of the work, certain potential risks were identified related to procurement procedures, pricing issues, as well as the existence of discretionary powers and possible situations of conflicts of interest.

Based on the results of the analysis, the Compliance Service compiled a **register and a risk map of corruption risks**, prepared the relevant recommendations, and approved an **Action Plan** aimed at eliminating the causes and conditions contributing to the emergence of corruption risks.

The implementation of the proposed measures is aimed at further enhancing the transparency and accountability of business processes, strengthening internal control mechanisms, and consistently developing and reinforcing the compliance and anti-corruption management system at **JSC NC “KazMunayGas”**.

Regular internal analysis of corruption risks is an important element of the corruption prevention system and contributes to fostering a culture of integrity, responsibility, and **zero tolerance for corruption** within the Company.

**Compliance Service
JSC NC “KazMunayGas”**