

List of positions subject to corruption risks, identified based on the results of the internal corruption risk analysis in the Joint Stock Company “National Center for Professional Development “Orleu”

Position subject to corruption risk	Official powers containing corruption risks	Corruption risks	Level of corruption risk
Members of the Executive Body (Management Board) of the Company	Organization of the Company’s activities and its structural units and branches	Authority to make decisions and perform administrative, economic, and organizational-management functions at the Company level	High
Directors of the Company’s Branches	Organization of the activities of branch structural units	Authority to make decisions and perform administrative, economic, and organizational-management functions at the Company level	High
Directors of the Company’s Departments	Organization of the activities of the Company’s Departments	Carrying out activities and/or making decisions in situations involving a conflict of interest	High
Director of Department – Chief Accountant	<ul style="list-style-type: none"> - Budget planning - Accounting and preparation of reports influencing decision-making (financial matters: asset accounting, inventory, etc.) 	<ul style="list-style-type: none"> - Possibility of including information in budget requests that influences the increase of allocated funds; - Possibility of generating unreliable indicators and distorting financial statements 	High
Employees from the HR Department	Organization of recruitment procedures, drafting requirements for applicants and competitive selection questions, participation in the work of the selection commission, ensuring working conditions for employees	<ul style="list-style-type: none"> - Possibility of tailoring competition requirements and providing selection questions to specific applicants; - Possibility of giving preference to certain applicants; - Violation of the meritocracy principle, possibility of creating “comfortable” and “uncomfortable” working conditions 	Medium

Employees responsible for organizing and conducting public procurement	Organization and conduct of public procurement procedures	<ul style="list-style-type: none">- Overpricing during planning of procurement of goods, works, or services;- Lack of proper examination of procurement documentation (absence of market analysis, drafting technical specifications tailored to a specific supplier);- Violation of procedures and deadlines for publishing documentation and conducting procurement	Medium
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Anti-Corruption Compliance Officer

S.Ye. Sakenov