

**ANALYTICAL REFERENCE**  
**based on the results of an internal analysis of corruption risks**  
**JSC "Aviation Administration of Kazakhstan"**

Astana, 2024.

**Name of the object of internal analysis of corruption risks:** JSC Aviation Administration of Kazakhstan (*hereinafter referred to as AAK*).

**The source of information for conducting an internal analysis of corruption risks is:** Article 8. Law of the Republic of Kazakhstan "On Combating Corruption", paragraph 1.2 Plan - Work Schedule of the Senior Inspector for Compliance and Internal Security, approved by the decision of the Board of Directors of the AAK dated 10.09.2024 No. 57, approved by Order No. 00/1125 dated 09.10.24 "On conducting an internal analysis of corruption risks" (*hereinafter - VACR*);

**Direction of internal analysis of corruption risks:**

1) Analysis of legal acts and internal documents regulating the activities of the object of analysis, its organizational and managerial activities for the presence of corruption risks ;

2) Implementation of control and audit functions;

3) By direction organizing work to combat corruption;

**The timing of the internal analysis of corruption risks:** The period for conducting the VACR is from October 15 to December 02, 2024.

**Period under analysis:** The period of the VACR is from January 1, 2023 to September 2024.

**The official of the subject of internal analysis of corruption risks, who is entrusted with the management, coordination and responsibility for conducting the internal analysis of corruption risks and the results of the work:** General Director of the AAC.

**Departments subject to VACR:** Flight Operations Department, Airworthiness Department, Unmanned Aircraft Systems Department and Air Navigation Department.

**Working group composition:**

1) Chairman of the working group – Senior Compliance and Internal Security inspector **Kabdoldanov B. K.**;

2) Member of the working group – Senior legal support officer of the Legal Support Department **Aytu Amirhan**;

3) Secretary of the working group – legal support officer of the legal support division **Yelemessov Zhan Kaiyrbekuly**;

4) Member of the working group – aviation inspector of quality and compliance division safety management quality strategy and compliance departament - **Dauren Maulenovich Abdugulov** .

5) Member of the working group - Senior human resources officer of the HR Department, **Gyuzel Serayeva**.

**To conduct an internal analysis of corruption risks, the following were used:**

1) Law of the Republic of Kazakhstan "On Combating Corruption";

2) Civil Code of the Republic of Kazakhstan;

3) Labor Code of the Republic of Kazakhstan;

4) Law of the Republic of Kazakhstan "On public procurement";

5) Personnel policy of the Company;

- 6) Corporate Governance Code;
- 7) Standard rules for conducting an internal analysis of corruption risks (approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 No. 12);
- 8) Methodological recommendations for conducting an internal analysis of corruption risks (approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488);
- 9) Information and documents submitted by structural divisions of the Company's analysis object;
- 10) Information and documents submitted by employees of the Company being analyzed;
- 11) Internal documents of the Company regulating the activities of structural divisions (*regulations and job descriptions of structural divisions*).

**1. Analysis of legal acts and internal documents regulating the activities of the object of analysis, its organizational and managerial activities for the presence of corruption risks**

As part of the analysis of legal acts regulating the activities of the object of analysis, its organizational and managerial activities for the presence of corruption risks, the Department of Air Navigation, the Department of Unmanned Aircraft Systems, the Department of Airworthiness, the Department of Flight Operations provided a list of regulatory legal acts of the Republic of Kazakhstan, which are used in their activities:

| Name of the legal act  | Approved  |
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| <b>Department of Aeronautical Sciences</b>   |   |
| Law of the Republic of Kazakhstan "On the use of airspace of the Republic of Kazakhstan and aviation activities"   | from July 15, 2010 No. 339-IV   |
| Rules for the use of airspace of the Republic of Kazakhstan  | Resolution of the Government of the Republic of Kazakhstan dated May 12, 2011 No. 506                                 |
| Rules for the organization of search and rescue support for flights on the territory of the Republic of Kazakhstan | Resolution of the Government of the Republic of Kazakhstan dated November 4, 2011 No. 1296                            |
| Instructions for the organization and maintenance of air traffic   | Order of the Acting Minister of Transport and Communications of the Republic of Kazakhstan dated May 16, 2011 No. 279 |
| Rules for radiotechnical support of flights and aviation telecommunications in civil aviation                      | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 29, 2017 No. 402         |

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| Rules for Providing Aeronautical Information in Civil Aviation  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 30, 2017 No. 420             |
| Rules for certification and issuance of a certificate of an air navigation service provider, as well as certification requirements for air navigation service providers | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 26, 2017 No. 384             |
| Standard Regulations on the Production and Dispatch Service of Civil Aviation Organizations   | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated November 2, 2015 No. 1030  |
| Rules for meteorological support of civil aviation  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 14, 2017 No. 345             |
| Rules of phraseology and radio exchange during flights and air traffic services   | Order of the Acting Minister of Transport and Communications of the Republic of Kazakhstan dated October 15, 2010 No. 454 |
| Aircraft Movement Message Formats   | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated September 9, 2014 No. 22          |
| Rules for admission of air routes to operation  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 19, 2017 No. 360             |
| Methodology for assessing the need for air traffic services   | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 19, 2017 No. 361             |
| <b>Department of Airworthiness</b>  |   |
| Law of the Republic of Kazakhstan "On the use of airspace of the Republic of Kazakhstan and aviation activities"  | from July 15, 2010 No. 339-IV   |
| Airworthiness standards for civil aircraft of the Republic of Kazakhstan  | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated March 27, 2015 No. 367     |
| Rules for certification and issuance of type certificate  | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated October 16, 2015 No. 994   |

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| Rules for certification and issuance of airworthiness certificates for civil aircraft of the Republic of Kazakhstan             | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated February 24, 2015 No. 198  |
| Certification rules in the field of light and ultra-light aviation  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated July 19, 2017 No. 483             |
| Rules for the technical operation and repair of civil aircraft of the Republic of Kazakhstan                                    | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated April 30, 2015 No. 551            |
| Certification requirements for organizations engaged in maintenance and repair of aviation equipment                            | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated February 24, 2015 No. 196  |
| Rules for certification and issuance of a certificate of an organization for maintenance and repair of civil aviation equipment | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated February 24, 2015 No. 197  |
| Rules for state registration of civil aircraft  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 30, 2017 No. 409             |
| Rules for applying state, registration identification and additional marks on civil and experimental aircraft                   | Order of the Acting Minister of Transport and Communications of the Republic of Kazakhstan dated October 26, 2010 No. 477 |
| certification requirements for civil aircraft operators   | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated February 24, 2015 No. 153  |
| Rules for certification and issuance of an operator certificate for civil aircraft  | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated November 10, 2015 No. 1061 |
| Rules for admitting an operator to aviation work  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated October 30, 2015 No. 1024         |
| Rules for admission to flights of general aviation operators  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated October 30, 2015 No. 1023         |

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| Rules for the use of unmanned aircraft systems in the airspace of the Republic                                   | Order of the Acting Minister of Industry and Infrastructure Development of the Republic of Kazakhstan dated December 31, 2020 No. 706  |
| <b>Department of Unmanned Aircraft Systems</b>   |  |
| Law of the Republic of Kazakhstan "On the use of airspace of the Republic of Kazakhstan and aviation activities" | from July 15, 2010 No. 339-IV  |
| Rules for the use of unmanned aircraft systems in the airspace of the Republic of Kazakhstan                     | Order of the Acting Minister of Industry and Infrastructure Development of the Republic of Kazakhstan dated December 31, 2020 No. 706. |
| Rules for state registration of civil aircraft of the Republic of Kazakhstan and rights to them                  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated June 30, 2017 No. 409                          |
| Rules for the use of airspace of the Republic of Kazakhstan  | Resolution of the Government of the Republic of Kazakhstan dated May 12, 2011 No. 506.   |
| <b>Flight Operations Department</b>  |  |
| Law of the Republic of Kazakhstan "On the use of airspace of the Republic of Kazakhstan and aviation activities" | from July 15, 2010 No. 339-IV  |
| Rules for admission to flights of general aviation operators   | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated October 30 2015 No. 1023                       |
| Rules for admitting an operator to aviation work   | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated October 30 2015 No. 1024                       |
| Rules for certification and issuance of an operator certificate civil aircraft                                   | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated November 10 2015 No. 1061               |
| Standard contract for the provision of services by an aeroclub   | Order of the Minister of Transport and Communications of the Republic of Kazakhstan dated March 14, 2011 year No. 139                  |
| Certification requirements for civil aircraft operators  | Order of the Acting Minister of Investment and Development of the  |

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|  | Republic of Kazakhstan dated February 24<br>2015 No. 153  |
| Rules for the organization of working hours and rest of crew members of civil and experimental aviation aircraft of the Republic of Kazakhstan | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated February 27<br>2015 No. 250     |
| Rules for the organization of flight work in civil aviation<br>Republic of Kazakhstan  | Order of the Minister of Investment and Development of the Republic of Kazakhstan dated March 20, 2015<br>year No. 307  |
| Standard regulations for flying clubs  | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated March 26<br>2015 No. 326 |
| Qualification requirements for candidates for the position of first airline executive  | Order of the Minister of Transport and Communications of the Republic of Kazakhstan dated August 20<br>2010 No. 369     |
| Flight preparation rules for civil and experimental aircraft<br>aviation   | Order of the Minister of Transport and Communications of the Republic of Kazakhstan dated June 25, 2011<br>year No. 390 |
| Rules for the production of flights in civil aviation of the Republic<br>Kazakhstan  | Order of the Acting Minister of Investment and Development of the Republic of Kazakhstan dated July 28<br>2017 No. 509  |

Based on the results of the above analysis, the following corruption factors were identified, as provided for in paragraph 21 of the Methodological Recommendations for Conducting an Internal Analysis of Corruption Risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488 in the regulatory legal acts of the object of analysis for the following factors:

**Legal gap.**

***There is no procedure for selecting and engaging non-profit organizations that unite aircraft operators.***

In accordance with subparagraph 12) of paragraph 2 of Article 16-9 of the Law of the Republic of Kazakhstan “On the Use of the Airspace of the Republic of Kazakhstan and Aviation Activities” (*hereinafter referred to as the Law*), an authorized organization in the field of civil aviation, within the limits of its competence, attracts non-profit organizations uniting aircraft operators (*hereinafter referred to as NPOs*), in cases established by this Law.

According to subparagraph 3) of paragraph 2 of Article 47 of the Law, the procedure for engaging non-profit organizations that unite aircraft operators and the qualification requirements of specialists of such organizations are determined by the rules of certification in the field of light and ultra-light aviation.

However, the Certification Rules in the Sphere of Light and Ultra-Light Aviation, approved by the Order of the Minister of Investment and Development of the Republic of Kazakhstan dated July 19, 2017 No. 483 (hereinafter referred to as Rules No. 483) establish the procedure for interaction between the Company and the NPO when providing services. At the same time, the Law and Rules No. 483 do not provide for the procedure for selecting the NPO, including the conditions and requirements under which the NPO is allowed to perform the work provided for in Article 47 of the Law. In other words, there is no procedural order that ensures the influence of interested individuals or legal entities on the choice of the NPO.

***There is no procedure for allowing temporary deviations from certification requirements.***

In accordance with paragraph 1 of Article 35-1 of the Law, air navigation service providers must comply with the certification requirements imposed on air navigation service providers.

In this case, by agreement with the authorized organization in the field of civil aviation, temporary deviations from certification requirements are permitted if such deviations are compensated by the introduction of additional measures that ensure a level of flight safety equivalent to the established one.

At the same time, in accordance with paragraph 24 of the Rules for the Certification and Issuance of an Air Navigation Service Provider Certificate, as well as the certification requirements for air navigation service providers (approved by Order No. 384 of the Minister of Investments and Development of the Republic of Kazakhstan dated June 26, 2017, hereinafter referred to as Rules No. 384), if aviation inspectors identify deviations from certification requirements during a certification survey caused by an emergency of a natural or man-made nature, the elimination of failures or malfunctions of equipment, or is due to the implementation of the flight safety management system implementation plan, or in the presence of a corrective action plan agreed with the authorized organization in the process of ongoing supervision (during recertification), the commission establishes the possibility of issuing a certificate for the period of eliminating non-conformities with the certification requirements, indicating the additional measures taken by the applicant to ensure a level of flight safety equivalent to the established one.

However, the procedure for coordinating temporary derogations is not provided for by the Law on Temporary Derogations and Rules No. 384.

It is also worth noting that the absence of grounds for approving the above-mentioned temporary deviations from qualification requirements, as provided for by the legislation of the Republic of Kazakhstan, also falls under the following corruption



factors: “breadth of discretionary powers”, “establishment of a right instead of an obligation of officials”;

**Legal and linguistic uncertainty.**

*No cases have been disclosed in which there is a significant impact on flight safety.*

In accordance with paragraph 368 of the Rules for the Technical Operation and Repair of Civil Aircraft of the Republic of Kazakhstan, approved by order of the Minister of Investments and Development of the Republic of Kazakhstan dated April 30, 2015 No. 551 (hereinafter referred to as Rules No. 551), the aircraft operator shall send to the state of registration, the organization responsible for the type design or modification of the type design and, if necessary, the state of the operator a report on any identified violation of the airworthiness of the aircraft or component that significantly affects the safety of the flight.

At the same time, all aircraft failures and damages that significantly affect flight safety must be eliminated before the next flight ( *clause 372 of Rules No. 551* ).

However, Rule No. 551 does not specify what is meant by a significant impact on flight safety;

**Establishing a right instead of a duty for officials.**

*Establishing the possibility of drawing up final documents and taking measures based on the results of inspections, etc.*

In accordance with paragraph 6 of Article 10 of the Law, based on the results of inspections and other forms of control and supervision, employees of the authorized organization in the field of civil aviation may draw up final documents (acts, inspection orders) and take measures of influence provided for by this Law and other laws of the Republic of Kazakhstan.

At the same time, despite the fact that other provisions of the Law establish specific cases in which an inspection order is issued and inspection reports are drawn up, the above-mentioned provision may serve as the basis for making a decision on drawing up final documents at the sole discretion of the aviation inspector.

*Permission to approve flights whose duration exceeds the shortest operating time of the most time-limited system.*

In accordance with paragraph 7 of the Rules for the Operation of Flights in Civil Aviation of the Republic of Kazakhstan, approved by the order of the Acting Minister of Investments and Development of the Republic of Kazakhstan dated July 28, 2017 No. 509 (hereinafter referred to as Rules No. 509), an authorized organization is allowed, based on the results of a specific flight safety risk assessment conducted by the operator and demonstrating how an equivalent level of flight safety will be maintained, to approve flights whose duration exceeds the shortest operating time of the most time-limited system ( *hereinafter referred to as Flights* ).

Based on the wording of the above-mentioned norm, the Company has the right to approve Flights, but has no obligation to carry out such administrative actions at the request of the applicant.

**As part of the analysis of the internal documents** of the object of analysis, **the following was revealed.**

**According to the Airworthiness Department of the AAK, the internal documents** ( provided by the object of analysis in accordance with the SZ dated 10/28/2024 (via e-mail) regulating the activities of the object of analysis in accordance with the legislation of the Republic of Kazakhstan on the use of the airspace of the Republic of Kazakhstan and aviation activities (*hereinafter referred to as the Legislation*) were also considered and the source of information for conducting an internal analysis of corruption risks , such as:

1. (AAK-AC Registry ) Instructions for processing and reviewing applications for obtaining certificates of state registration of civil aircraft of the Republic of Kazakhstan, approved by order of the General Director of the Company dated 02.02.2024 No. 05/120 (hereinafter referred to as the Registration Instructions);

2. (AAK-AIRP.0504) Instructional material - Procedure for approval of the aircraft maintenance program" and "AAK-AIR-F.0505 Checklist for assessment of the aircraft maintenance program", approved by the order of the General Director of the Company dated 26.12.2023 No. 05/1250 (hereinafter - IM for the aircraft maintenance program);

3. (AAK-AIR-P.0510) Instructional material - Control of the use of aircraft components, approved by the order of the General Director of the Company dated 10.06.2024 No. 05/646 (hereinafter - IM for control of aircraft components);

4. (AAK-AIR-P.0515) Guidance Material (Procedure) - "Procedure for the Transfer of Information on Operational Deficiencies" ( GM for the Transfer Procedure );

5. (AAK-AIR-P.0517) Instructional material for issuing an airworthiness certificate for aircraft, approved by the order of the General Director of the Company dated 24.03.2023 No. 05/235 (hereinafter referred to as the IM for issuing an airworthiness certificate);

6. ("AAK-AIR-F.0541) Instructional material Program for inspection of continuing airworthiness of aircraft" (hereinafter referred to as the IM for the inspection program), approved by the order of the General Director of the Company dated 26.12.2023 No. 05/1249;

7. ("AAK-AIR-P.0519) Instructional material Procedure for issuing a certificate of an organization for maintenance and repair of civil aviation equipment", approved by the order of the General Director of the Company dated 23.08.2024 No. 05/928 (hereinafter referred to as the IM for issuing a certificate of maintenance and repair of civil aviation equipment);

8. (AAK-AIR-P.0520) Instructional material on the procedure for continuous supervision of maintaining airworthiness and maintenance and repair of aircraft equipment, approved by the order of the General Director of the Company dated 03.08.2023 No. 05/739 (hereinafter referred to as the IM on the procedure for supervision of LG);

In accordance with paragraph 21 of the Methodological Recommendations for Conducting an Internal Analysis of Corruption Risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488 (hereinafter referred to as the Methodology), the following most **typical corruption factors were used to conduct the assessment**, of which:

1) **according to the legal gap identified in the provisions of the IM on control of components of the Armed Forces**, namely:

- **in the fourth paragraph of item B.5** *In accordance with the procedure for the transfer of information on operational deficiencies AAK-AIR-P.0515, inspectors of the DLG, during the inspection of such documents as RERTO and RPO, must ensure that they contain the necessary reporting procedures*

Expressed in the absence of provisions regulating the competence of the official and/or the object of analysis;

**In the provisions IM according to the PH surveillance procedure:**

- **in the second paragraph of p. B.5.3.2.** *During the preparation, the inspector must allocate sufficient time to effectively check the items of the "Program for certification survey/inspection check of the OTO and RAT" (see the appendix to the DLG Procedure "Procedure for conducting certification of an organization for maintenance and repair of aircraft equipment") (hereinafter referred to as the Inspection Check Program) by preparing an inspection agenda in the form according to APPENDIX No. 3B to this Procedure (hereinafter referred to as the Agenda).*

Expressed in the absence of deadlines for carrying out administrative procedures;

2) **in terms of the breadth of discretionary powers**, as revealed **in the provisions of the IM on the survey program**, namely:

- **in paragraph B.5.5.** *The inspector shall promptly report to the immediate supervisor any first level non-conformities/violations and observations which, in the inspector's opinion, create or significantly increase a safety hazard.*

Expressed in the absence or uncertainty of grounds for officials to make decisions or perform other administrative procedures;

**In the provisions of the IM on issuing the LG certificate:**

- **in paragraph B.2.2 Note:** *The inspector may inform the applicant of discrepancies in the application by e-mail, and the applicant may withdraw the application to allow for changes. The inspector must ensure that the incorrect application has been withdrawn.*

**In the provisions IM issuing certificates of TO and RAT:**

- **in paragraph ten in p.B.5.6.2** *The Head of the DLG Department may return the decision on the application to the inspector for review if the information in the decision is not detailed or if inconsistencies are found in it.*

Expressed in the use of the wording "have the right", "may", which can cause corruption risks in the interaction of the object of analysis with applicants;

**In the provisions IM according to the PH surveillance procedure:**

- **in the second paragraph of clause B.5.1.1.4.4.2** *Random inspections are carried out using the DLE instructional materials and within the timeframes established by the DLE Schedule of General Aviation Operator Inspections. During the inspection, the DLE checks the continued airworthiness of light and ultra-light GA aircraft using the DLE instructional material ("Procedure for Conducting Inspections for Continuing Airworthiness of Aircraft"). During the PLG inspection, the inspector may decide to conduct a physical inspection of the aircraft to ensure that there are no discrepancies between the aircraft and the documents being inspected. The continued airworthiness of light and ultra-light aircraft operated in the ATC is checked during random inspections by the ATC jointly with the DL in accordance with the DL Plan using the DL instructional material and the DLG procedure "Procedure for Conducting Inspections for Continuing Airworthiness of Aircraft". During the PLL inspection, the inspector may decide to conduct a physical inspection of the aircraft to ensure that there are no discrepancies between the aircraft and the documents being inspected.*

- **in paragraph B.5.1.1.8** *The validity period of the ATC certificate is 2 years. The ATC supervision plan is developed by the DL. The DL and the DLG, by mutual agreement, determine the list of ATCs, in the supervision of which the DLG inspectors participate. As a general approach, the DLG participates in the supervision of the ATCs in cases where aircraft are operated for training purposes. In such cases, the DLG verifies the compliance of the ATC with the requirements for continuing airworthiness and technical maintenance of aircraft. The inspections are carried out using the DL instructional material and the DLG procedure "Procedure for conducting inspections of continuing airworthiness of aircraft". During the inspection of the PLG, the inspector may decide to conduct a physical inspection of the aircraft to ensure that there are no discrepancies between the aircraft and the documents being inspected.*

Expressed in the use of the wording "have the right", "may", which may give rise to corruption risks;

6) **The excessive demands on a person, presented for the implementation of his right**, are revealed in the provisions of the Registration Instructions, namely

- **in paragraph seven of clause B.5.2** *Upon returning to the AAK office, the Inspector must hand over to the registration specialist for safekeeping the originals of the following documents:*

- *If there is a sales contract or other document confirming the right of ownership; a document confirming the written consent of the participants in the common ownership of the aircraft to a person who is not a participant in the ownership of the aircraft (in case of shared ownership); a lease, rental agreement, property lease, or other document confirming the right to use the aircraft; an act of acceptance and transfer of a civil aircraft;*

Expressed in the transfer of the original title documents by the inspector to a specialist, while the originals of these documents must be with the owner of the aircraft.

**AAK Flight Operations Department** the **internal documents (provided by the object of analysis** in accordance with the SZ of 21.10.2024 No. 04-01-25/3114) regulating the activities of the object of analysis in accordance with the legislation of the Republic of Kazakhstan on the use of the airspace of the Republic of Kazakhstan and aviation activities , such as:

1. (AAK-AIR-P.0507) Guidance material for approval of the minimum equipment list (MEL)/configuration deviation list (CDL), approved by the order of the General Director of the Company dated 29.01.2024 No. 04/106 (hereinafter referred to as the IP for the MEL and CDL list);

2. (AAK-OPS-F.0409A) Instructional material for checking the flight operations manual of a commercial aviation operator, approved by order of the General Director of the Company dated 29.01.2024 No. 04/106 (hereinafter referred to as the IP according to the RPP);

3. (AAK-OPS-F.0409a-1) Instructional material for checking the flight operations manual for operators performing aviation work, approved by the order of the General Director of the Company dated September 29, 2023 No. 04/944 (hereinafter referred to as the IP for the RPP for aviation work);

4. (AAK-OPS-F.0409B) Instructional material for checking the cabin crew management, approved by the order of the General Director of the Company dated 29.01.2024 No. 04/106 (hereinafter referred to as the IM for checking the cabin crew management);

5. (AAK-OPS-M.0409) Instructional material for the certification of civil aircraft operators, approved by the order of the General Director of the Company dated September 29, 2023 No. 04/944 (hereinafter referred to as the IM for the certification of operators);

6. (AAK-OPS-P.0408) Instructional material for the demonstration of emergency evacuation and landing of an aircraft, approved by the order of the General Director of the Company dated September 29, 2023 No. 04/944 (hereinafter referred to as the IM for the demonstration);

7. (AAK-OPS-M.0409-1) Instructional material on the procedures for certification of operators performing aviation work, approved by the order of the General Director of the Company dated September 29, 2023 No. 04/944 (hereinafter referred to as the IM for GA certification);

8. (AAK-OPS-P.0414) Instructional material for the organization of demonstration and special demonstration flights (hereinafter referred to as IM for demonstration flights);

9. (AAK-OPS-P.0424-1) Instructional material on the organization of control and supervision of operators performing aviation work and general aviation performing flights on light and ultra-light aircraft, approved by the order of the General Director of the Company dated September 29, 2023 No. 04/944 (hereinafter referred to as the IM on control and supervision );

In accordance with paragraph 21 of the Methodological Recommendations for Conducting an Internal Analysis of Corruption Risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488, the following most **typical corruption factors were used to conduct the assessment**, of which:

3) **on the legal gap identified in the provisions of the IM on RPP for aviation work**, namely:

**In the provisions of the IM on flight demonstrations - in the second paragraph in clause 36**

*New type of operation. JSC "AAK" requires that the Applicant, operating an aircraft that has not previously demonstrated such type of operation, perform at least four demonstration and special demonstration flights (unless JSC "AAK" determines that a satisfactory level of experience has been demonstrated in a smaller number of flights).*

**- in the second paragraph of item 38** *Demonstration flights may be combined with commercial flights if the operator expands the types of operations on aircraft previously operated by the airline. In this case, the first 10 commercial flights (unless JSC AAK determines that a satisfactory level of experience has been demonstrated in a smaller number of flights) must be performed under the supervision of an aviation inspector of JSC AAK.*

Expressed in the absence of provisions regulating the competence of the official and/or the object of analysis;

4) **on the legal and linguistic uncertainty identified in the provisions of the IM for the demonstration of operators**, namely:

**- in p.9** *The choice of the survey method depends in each specific case on the operational powers expected by the Applicant and the approved Survey Program;*

**- in paragraph 37** *Certain items of the proposal may require on-site assessment. For example, the hangar area or the apron space that the Applicant intends to use for the demonstration must be checked for adequacy.*

Expressed in the presence of wording contained in the provision that has unclear or ambiguous meanings and thus allows for unlawful interpretations.

**In the IM provisions for flight demonstrations - in paragraph 50**, *the Inspection Commission must first review the Applicant's Demonstration Plan in order to determine whether the appropriate documentation has been submitted. The plan must contain reliable data that allows JSC "AAC" to adequately observe and evaluate the applicant's overall capabilities.*

Expressed in the presence of wording contained in the provision that has unclear or ambiguous meanings and thus allows for unlawful interpretations.

5) **by the breadth of discretionary powers identified in the provisions of the IM on the MEL and CDL list**, namely:

**- in the second paragraph of clause 24**, *the period for examination and decision-making on approval of the MEL must not exceed 30 (thirty) days from the date*

of filing the Application, if there are no significant comments on the content of the MEL.

Expressed in the uncertainty of the grounds for officials to make decisions or perform other administrative procedures;

6) **to establish the right instead of the obligation of officials**, as identified in the provisions of the IM on certification of operators, namely:

**In the provisions of the IM for demonstration**

- **in paragraph 13**, the AAK may require the Applicant to conduct a full demonstration of emergency evacuation for the aircraft configuration within 90 seconds or less;

- **in p.14** The AAK may require the Applicant to conduct a partial demonstration of emergency evacuation, in the performance of which the participating passengers are not involved;

- **in p.14** The AAK may require the Applicant to conduct a partial demonstration of emergency evacuation, in the performance of which the participating passengers are not involved;

- **in the second paragraph of clause 29** In determining whether an actual "dark night" demonstration is required, the AAK may consider emergency evacuation demonstrations conducted by the aircraft manufacturer or another operator for aircraft of the same type and model;

Expressed in the use of the wording "have the right", "may".

**In the provisions of the IM on certification of AON - in paragraph 43** The period or other amendments specified in the PKD may be extended by the AAK, provided that the operator provides justification for the need for changes. Extension of the terms of corrective actions is possible after the operator's request, provided that the execution periods agreed upon by the AAK have not expired and a reasoned justification is provided with evidence of the need to extend the periods;

Expressed in the use of the wording "have the right", "may".

**In the provisions of the IM for flight demonstrations**

- **in paragraph 35**, the Requirements for a new type of aircraft and aircraft with significant changes in design, for the Applicant of which the owner of the aircraft is the following:

1) a new aircraft type for the Applicant. JSC AAK may require that the Applicant perform at least four demonstration and special demonstration flights (unless JSC AAK determines that a satisfactory level of experience has been demonstrated in a smaller number of flights) were performed by the Applicant proposing to use the aircraft type for the first time;

2) significant changes in the design of the aircraft.

JSC "AAK" may require the Applicant to conduct at least two demonstration flights when the design of the aircraft to be used has been significantly changed.

- **in subparagraph 2 of paragraph 40** ferry flights. Ferry flights performed in accordance with the applicable requirements and approved by JSC "AAK" may be

counted as a demonstration flight. In order to obtain approval from JSC "AAK", the Applicant must demonstrate that no feature, characteristic or condition of the aircraft will make it dangerous when operated in accordance with the Flight Rules"

- in **paragraph 68**, JSC "AAK" may reduce the total number of flights or hours of demonstration and special demonstration flights for a specific Applicant;

Expressed in the use of the wording "have the right", "may".

AAK Air Navigation Department, the source of information for conducting an internal analysis of corruption risks is **the internal documents** (provided by the object of analysis via e-mail) regulating the activities of the object of analysis in accordance with the legislation of the Republic of Kazakhstan on the use of airspace of the Republic of Kazakhstan and aviation activities, such as:

1. Instructional material for conducting an analysis of the quality of published aeronautical information (aeronautical data) and cartographic information (approved by order of the State Duma of the Company No. 07/1101 dated 06.11.2023) (*hereinafter referred to as the IM for analysis*);
2. Instructional material on the organization of the certification survey of air navigation service providers and continuous supervision of flight safety during their activities (approved by the order of the State Duma of the Company No. 07/1106 dated 07.11.2023) (*hereinafter referred to as the IM for certification*);
3. Instructional material for conducting inspections (certification surveys) of the air navigation service provider of the Republic of Kazakhstan by aviation inspectors) (approved by order of the State Duma of the Company No. 07/1231 dated 20.12.2023) (*hereinafter referred to as the IM for verification*);
4. Methodology for submitting applications for the publication of NOTAM notices (approved by order of the State Duma of the Company No. 07/1238 dated 21.12.2023).

In accordance with paragraph 21 of the Methodological Recommendations for Conducting an Internal Analysis of Corruption Risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488 (*hereinafter referred to as the Methodology*), the following most **typical corruption factors** were used to conduct the assessment, of which:

7) **according to the legal gap**, revealed in the provisions of the IM by analysis, namely:

- in **paragraph 4.12** *After drawing up the Report based on the results of the analysis, in case of detection of violations, aviation inspectors of the Department of Air Navigation issue an inspection order indicating the required period for elimination of the detected violations. In case of detection of critical violations requiring immediate elimination, the inspection order specifies the need to issue a NOTAM.* Expressed in the indication of the type of violation (critical), which contradicts the legislation of the Republic of Kazakhstan in the field of use of the airspace of the Republic of Kazakhstan and aviation activities (*hereinafter referred to as the Legislation*).



8) **on legal and linguistic uncertainty** , revealed in the provisions of the **IM on certification** , namely:

- **in paragraph 2 p.12.2** *The specifics of the application of warning functions are established by the Instructional Material on the Organization and Maintenance of Air Traffic, approved by the order of the Acting Minister of Transport and Communications dated May 16, 2011 No. 279* , Expressed in the indication of a reference to an incorrect name of a regulatory legal act , while the order of the Acting Minister of Transport and Communications of the Republic of Kazakhstan dated May 16, 2011 No. 279 approved the Instructions on the Organization and Maintenance of Air Traffic;

**In the provisions of the IM on verification - in paragraph 2 p.1.2.7.3** *For example: An aviation inspector receives information from a representative of an ANO provider on how and according to what documents a particular process, procedure, etc. is carried out . In this case, the aviation inspector must analyze this information and directly check (if possible) how a particular process (procedure), information about which was provided by the representative of the provider, is carried out in real time.* Expressed in the designation of the same phenomena (the word "provider") by different terms.

9) **in terms of the breadth of discretionary powers** , as revealed in the **provisions of the IM on certification** , namely:

- **in p. 6.3.** *In the event that, during the inspection, violations of the established requirements of the rules and procedures in the ATM system (provision of ANO) are identified that are systemic in nature and require prompt response measures in order to maintain flight safety, the authorized organization draws up orders to eliminate the identified violations within a specified time frame. The order is signed by the head of the authorized organization or his deputy.* Expressed in the ability of an official or object of analysis to make a type of decision (order) that contradicts the legislation of the Republic of Kazakhstan;

10) **on establishing the right instead of the duty of officials**, as revealed in **the provisions of the IM on certification** , namely:

- **in paragraph 6.1** . *Based on the results of the inspection, the authorized organization, within the limits of its powers, may issue administrative documents: an inspection order .* Expressed in the ability of an official or an object of analysis to make several types of decisions, or to refuse to make a decision.

## RECOMMENDATIONS:

1. To familiarize the employees of the air navigation department, the unmanned aircraft systems department, the airworthiness department, the flight operations department, who participate in the development of recommendations for amendments and additions to the regulatory legal acts of the Republic of Kazakhstan, including specialists in aviation standards, with the provisions of the Methodological

recommendations for conducting an internal analysis of corruption risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488.

2. Take measures to eliminate the identified corruption factors based on the results of the analysis of regulatory legal acts related to the statutory activities of JSC Aviation Administration of Kazakhstan, as well as the internal documents of the Company.

3. Amend the Rules for organizing work on the development of draft regulatory legal acts in JSC Aviation Administration of Kazakhstan in order to include in the procedure for developing a draft regulatory legal act the stage of analyzing this project for the presence of corruption factors in accordance with the Methodological Recommendations for conducting an internal analysis of corruption risks, approved by the order of the Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-Corruption Service) dated December 30, 2022 No. 488.

## **2. Implementation of control and audit functions.**

In accordance with order No. 00/1125 On conducting an internal analysis of corruption risks in the period from October 15 to November 15, 2024, the following were selectively reviewed: materials of certification surveys and random inspections of civil aviation organizations, instructional materials and checklists for conducting certification surveys and random inspections, documents confirming the planning of inspections taking into account the risk assessment, control and supervision programs for the period from January 2023 to September 2024, regulations and job descriptions, the audit was carried out in accordance with the access to data provided through the SharePoint platform by the object of analysis.

### **Department of Aeronautical Sciences:**

| <b>No.</b> | <b>Planning</b>  | <b>Type of check</b>   | <b>Materials for verification</b>  | <b>Notes</b>            |
|------------|--|--|--|-------------------------|
| 1          | According to the plan for ensuring continuous supervision. | Certification inspection from May 15 to May 19, 2023 of the branch "YuV RC OVD" of the RSE "Kazaeronavigatsia".        | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation. | No comments were found. |
| 2          | According to the plan for ensuring continuous supervision. | Random inspection from December 11 to December 15, 2023 of the branch "YuV RC OVD" of the RSE on the Right of Economic | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;               | No comments were found. |

|   |  |  |  |                         |
|---|--|--|--|-------------------------|
|   |  | Management " Kazaeronavigatsia " including UP " Boroldai " .   | 5) Evidence documentation.   |                         |
| 3 | According to the plan for ensuring continuous supervision. | Certification survey from June 18 to June 21, 2024 of the Ural branch of the RSE " Kazaeronavigatsia "   | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation.                 | No comments were found. |
| 4 | According to the plan for ensuring continuous supervision. | Random inspection from July 9 to July 11, 2024 of the Karaganda branch of the State Enterprise on the Right of Economic Management " Kazaeronavigatsia " . | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;<br>5) Evidence documentation. | No comments were found. |

**Airworthiness Department:**

| No. | Planning   | Type of check  | Materials for verification   | Notes                   |
|-----|--|--|--|-------------------------|
| 1   | According to the plan for ensuring continuous supervision. | Certification survey from June 12 to June 16, 2023. East Wing JSC .    | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation.                 | No comments were found. |
| 2   | According to the plan for ensuring continuous supervision. | Random inspection from 02 to 05 May 2023. JSC "Airline" Burundayavia " | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;<br>5) Evidence documentation. | No comments were found. |

*Analytical report on internal analysis of corruption risks  
JSC "Aviation Administration of Kazakhstan"*

|   |  |  |  |                         |
|---|--|--|--|-------------------------|
| 3 | According to the plan for ensuring continuous supervision. | Certification survey from April 16 to 19, 2024. Dala Air LLP | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation.                 | No comments were found. |
| 4 | According to the plan for ensuring continuous supervision. | inspection from 10 to 12 April 2024 JSC " Air Astana "       | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;<br>5) Evidence documentation. | No comments were found. |

**Flight Operations Department:**

| No. | Planning   | Type of check  | Materials for verification   | Notes                   |
|-----|--|--|--|-------------------------|
| 1   | According to the plan for ensuring continuous supervision. | Certification survey from August 14 to 23, 2023. Alpha Sky LLP .                       | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation.                 | No comments were found. |
| 2   | According to the plan for ensuring continuous supervision. | Random inspection from November 20 to November 24, 2023. JSC "Airline" Euro-Asia Air " | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;<br>5) Evidence documentation. | No comments were found. |
| 3   | According to the plan for ensuring continuous supervision. | Certification survey from February 19 to March 01, 2024. JSC " Fly Arystan "           | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation.                 | No comments were found. |

|   |  |   |  |                         |
|---|--|---|--|-------------------------|
| 4 | According to the plan for ensuring continuous supervision. | Random inspection from April 24 to April 26, 2024, JSC RSE on the Right of Economic Management "State Airline Berkut" | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;<br>4) PKD for VP;<br>5) Evidence documentation. | No comments were found. |
|---|--|---|--|-------------------------|

**Department of Unmanned Aircraft Systems:**

| No. | Planning  | Type of check  | Materials for verification   | Notes                   |
|-----|---|--|--|-------------------------|
| 1   | In 2023, the Department of BAS, SO and VP did not conduct any inspections.  |  |  |                         |
| 2   | According to the schedule of inspections of operators of unmanned aircraft systems performing aviation work using unmanned aircraft systems | Random inspection from June 18, 2024. Caspian Radio Services LLP (Atyrau).             | 1) Order on conducting the military operation;<br>2) Checklist;<br>3) Act on the VP;                                 | No comments were found. |
| 3   | According to the schedule of inspections of operators of unmanned aircraft systems performing aviation work using unmanned aircraft systems | Certification survey from September 30 to October 4, 2024. Caspian Radio Services LLP. | 1) Order to conduct the investigation;<br>2) Checklist;<br>3) CO Act;<br>4) PKD for SO<br>5) Evidence documentation. | No comments were found. |

**3. In the direction of organizing work to combat corruption**

In the direction of organizing work to combat corruption, in accordance with the Protocol of the meeting of the Working Group for conducting the VAKR dated 14.10.24, the audit covered the following areas:

**Anti-corruption monitoring;**

- 214 employees of the Company were checked.
- Anti-corruption monitoring was carried out in the following order:

- Collection and generalization of information from open sources; data from legal statistics agencies, criminal record information, presence of individual entrepreneurship, participation in a legal entity, risk factors, tax arrears, in the bankruptcy register, alimony arrears, debtor/defendant in enforcement proceedings, connection with terrorist financing, criminal investigation, in the pedophile database, in the list of debtors temporarily restricted from leaving the country, tax and customs debts, seizure of bank accounts, ban on notarial acts, seizure of property, seizure of transport;

- Appeals from individuals and legal entities on issues of combating corruption, information from non-governmental and international organizations, data from sociological surveys on issues of combating corruption, publications in the media, and other sources of information not prohibited by law;

- Request from the HR Department for information on the presence of disciplinary sanctions and other measures applied to employees of the Company for the period from June 1 to September 26, 2024;

- Financial control measures (filing a declaration);

- Study and analysis of collected information;

- Identification of problematic issues that contribute to the manifestation of corruption in the Society;

- Formation of the results of anti-corruption monitoring with the development of proposals for improving the efficiency of the Company's activities.

Methodological recommendations for conducting thematic anti-corruption monitoring: In accordance with subparagraph 3) of paragraph 1 of Article 21 of the Law of the Republic of Kazakhstan "On Combating Corruption", the " Rules for Conducting Anti-Corruption Monitoring" were approved by the Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan dated January 28, 2020 No. 22 and in accordance with paragraph 6 of the Plan of organizational measures to combat corruption of the Company, approved on January 15, 2024 by the General Director of the Company.

Results of anti-corruption monitoring: during the anti-corruption monitoring conducted for the period from June 1 to September 27, 2024, no violations of the anti-corruption standard, as well as no facts of corruption violations among the Company's employees were identified.

*Note : the* Kompra database was used for verification . kz is an online verification service in the form of information and communication services, with the help of which users independently, in accordance with the current legislation of the Republic of Kazakhstan, collect data from open sources of state bodies, publicly available electronic information resources.

**Timely submission of the declaration by September 15, 2023 and September 16, 2024.**

As part of the VAKR in accordance with paragraph 6 of Article 6 of Chapter 2 of the Law of the Republic of Kazakhstan "On Combating Corruption" dated

18.11.2015 No. 410- V in order to ensure financial control and implement anti-corruption measures.

Flight Operations Department, Airworthiness Department, Aeronautical Department and Unmanned Aircraft Systems Department.

Results of the analysis: as a result of the VACR investigation, no violations related to corruption risks were found in the specified departments.

In 2023, the following employees were found to have failed to submit mandatory declarations on forms 250.00 and 270.00 on time: Stepanov L.N., aviation inspector of the Flight Operations Department, and Morozov N.G., aviation inspector of the Airworthiness Department. The above employees were brought to administrative responsibility in accordance with subparagraph 1 of part 1 of article 821 of the Code of the Republic of Kazakhstan "On Administrative Offenses"

#### **Anti-corruption restrictions**

As part of the VACR, inspections were conducted on the adoption and signing of consent to the adoption of anti-corruption restrictions (for officials) on the basis of paragraph 1 of Article 12 of the Law of the Republic of Kazakhstan "On Combating Corruption" in the Department of Unmanned Aircraft Systems (4 employees), the Department of Air Navigation (10 employees), the Department of Flight Operations (21 employees), and the Department of Airworthiness (22 employees). No violations were found.

#### **The fact of gifts**

No facts of acceptance of material rewards, gifts or services for actions (inactions) in favor of persons who presented them, if such actions are within the official powers in relation to employees of the above-mentioned Departments, were found during the audited period.

#### **Information on cases of disciplinary action and removal of disciplinary action**

Orders on the imposition of disciplinary sanctions for 2023–2024 AAK:

1. Akylbekov A. - Head of the Commercial Air Transport Department - Chief Aviation Inspector of the Airworthiness Department. Order No. 728 dated 08/25/2023 - Remark;

2. Abanazidi Yu. – Aviation Standards Specialist of the Air Navigation Department. Order No. 922 dated 10/30/2023 – Remark;

3. Babich I. – Senior Aviation Inspector of the Commercial Air Transport Directorate of the Flight Operations Department – to the Commercial Air Transport Flight Examiner. Order No. 952 dated 08.11.2023 – Remark;

4. Dautbaev E. - Senior Aviation Inspector of the Commercial Air Transport Department of the Airworthiness Department. Order No. 1156 dated 12/25/2023 - Reprimand;

5. Yunkov O. – Senior Aviation Inspector of the Commercial Air Transport Department of the Flight Operations Department. Order No. 16 of 08.01.2024 – reprimand;

6. Tunlikbaev Zh. – Senior Aviation Inspector of the Commercial Air Transport Department of the Flight Operations Department. Order No. 349 dated 11.04.2024 – reprimand;

7. Seitkerov E. - Head of the General Aviation and Aviation Works Department of the Airworthiness Department - Chief Aviation Inspector. Order No. 604 dated 14.06.2024 - reprimand.

**The fact of corruption:**

During the audit for 2023 and 9 months of 2024, no facts of corruption were found in the Department of Unmanned Aircraft Systems, the Department of Air Navigation, the Department of Airworthiness and the Department of Flight Operations.

However, on April 8, 2024, letter No. 1258 was received from Tanabaev R. from the Department of the Anti-Corruption Service for the city of Shymkent on receipt by the aviation inspector of the General Aviation and Aviation Works Department of the Flight Operations Department Zhusupov S.E. funds in the amount of 50,000 (fifty thousand) tenge from the management of the airline in Shymkent.

Following this incident, an internal investigation was conducted at the AAC. It was established that Zhusupov, during his business trip from October 18 to 20, 2023, allowed a corruption risk by receiving unjustified funds. Thus, he violated the norms of the approved Anti-Corruption Standard of the AAC and did not take full measures to prevent and suppress violations established by the legislation of the Republic of Kazakhstan, including the requirements of paragraph 4) of Article 12 and paragraph 3 of Article 16-6 of the Law "On the Use of the Airspace of the Republic of Kazakhstan and Aviation Activities". The requirements of paragraph 1) and paragraph 2) of Article 16-6 of the Law were also violated.

In accordance with subparagraph 3) of Article 141 of the Labor Code of the Republic of Kazakhstan, which provides for types of disciplinary sanctions, and on the basis of Article 64 of the Labor Code of the Republic of Kazakhstan, the employment contract with Zhusupov was terminated. As part of preventive measures, the AAK carried out work to explain the norms of the Anti-Corruption Standard and the Code of Business Ethics with the preparation of a protocol.

**Questionnaire upon dismissal:**

A survey of AAK employees' dismissals has not been conducted before.

In order to strengthen monitoring and analysis of the reasons for dismissal of employees, it is recommended to develop and implement a survey procedure for dismissal of AAK employees.

Conducting a survey will allow:

- identify reasons for dismissal, including potential problems in corporate culture, working conditions and management;
- identify opportunities to improve work processes and reduce staff turnover;
- improve measures to prevent corruption risks and comply with anti-corruption standards.



The questionnaire may include questions about reasons for leaving, satisfaction with working conditions, relationships within the team, as well as compliance with the principles of anti-corruption policy and business ethics.

**Media monitoring (facts):**

As a result of media monitoring (from open sources) for the period of 2023 and 9 months of 2024 on resources such as *tengrinevs* , *zakon . kz* , *orda . kz* , *nur . kz* , *vesti . kz* , *informburo . kz* , *kazinform* and others, no materials were found that discredited JSC Aviation Administration of Kazakhstan and employees for corruption and other offenses (regarding the Department of Air Navigation, the Department of Unmanned Aircraft Systems, the Department of Flight Operations and Airworthiness.

**Complaints via E - otinish (monitoring of corruption offences):**

The analysis of requests via the Eotinish platform was conducted within the framework of the VACR in the AAK for the period of 2023 and 9 months of 2024. The volume of requests analyzed: 3,382 requests were processed in 2023, 7,840 requests were processed in the 9 months of 2024.

As a result of the analysis of the requests, no facts indicating corruption offenses were identified. All requests were processed in accordance with the established processes, and no cases of violation of anti-corruption legislation were recorded.

**Conclusions:**

The E otinish platform remains an effective tool for interaction with citizens and legal entities. The procedures for processing requests comply with the requirements of transparency and anti-corruption standards.

**RECOMMENDATIONS:**

1. Strengthen control over compliance with deadlines for filing mandatory declarations by employees performing government or equivalent functions.
2. The HR Department should introduce mandatory collection of questionnaires indicating the reasons for dismissal during the process of dismissing employees.
3. Public Relations Department:
  - strengthen monitoring of the media and social networks for mentions of the AAC in a negative context; if mentions with negative content are detected, immediately inform the senior inspector for compliance and internal security.
4. Department of Information Technology Systems and Digitalization:
  - the Electronic Systems Manager (E- otinish ) shall ensure the timely transfer to the Senior Inspector for Compliance and Internal Security of information on complaints and appeals from individuals and legal entities related to violations of the law by AAC employees and the organization as a whole.

**The working group reviewed all issues provided for in the Work Plan for conducting an internal analysis of corruption risks of the Company.**

**Application :**

1. List of positions exposed to corruption risks,  
determined based on the results of an internal analysis of corruption risks.


Head of the working group - Senior Compliance  
and internal security inspector

  
\_\_\_\_\_ **Kabboldanov B.K.**

Member of the working group – Senior legal  
support officer of the Legal Support Department

  
\_\_\_\_\_ **Aitu A.**


Secretary of the working group – legal support officer  
of the legal support division

  
\_\_\_\_\_ **Yelemessov Zhan;**

Member of the working group – aviation inspector  
of quality and compliance division safety management  
quality strategy and compliance department

  
\_\_\_\_\_ **Dauren Abdugulov**

Member of the working group - Senior human resources  
officer of the HR Department

  
\_\_\_\_\_ **Gyuzel Serayeva**

**I have read,**  
**General director** \_\_\_\_\_ **C. Radu**

**Appendix No. 1**  
**to the analytical report on the results**  
**internal analysis of corruption risks**  
**JSC "Aviation Administration of Kazakhstan"**

**List of positions exposed to corruption risks,**  
**determined based on the results of an internal analysis of corruption risks**

Name of the object of internal analysis of corruption risks:

**1. Department of Airworthiness**

| Position subject to corruption risk                             | Official powers containing corruption risks  | Corruption risks                                   | Level of corruption risks |
|---|--|--|---------------------------|
| Director of the Department - Chief Aviation Inspector           | 2.6 Manage regulatory oversight, coordination and preparation for inspections/certifications/audits and other special events.<br>2.19. Ensure control over the compliance of certification surveys with approved programs, taking into account the interval.   | During inspection checks and certification surveys | Average                   |
| Head of Commercial Air Transport - Chief Aviation Inspector     | 2.4. Provision of public services stipulated by the Regulation on the Department for certification of civil aircraft, aviation equipment, civil aircraft maintenance and repair centers, issuance and renewal of relevant certificates using the Instructional Material.<br>2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.<br>2.45. General management of the Commercial Air Transport Airworthiness Department, planning its activities, as well as coordination and control of the work of inspectors and distribution of applications for certification received through the e- license portal .<br>2.51. Establish and implement a process for monitoring and effectively implementing the organization's MRO supervision plan .<br>Monitor the implementation of the program for supervision of maintenance and repair organizations , including unannounced inspections of maintenance and repair organizations . | During inspection checks and certification surveys | Average                   |
| Senior Aviation Inspector, Commercial Air Transport Directorate | 2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.<br>2.17. Monitoring the execution of inspection orders to eliminate violations identified as a result of inspections and other forms of control.<br>2.18. Checking the availability of certificates, permits and documents, the issuance of which is provided for by current legislation.<br>2.41. Coordination of the activities of the Directorate inspectors and distribution of incoming applications for certification, review of correspondence, control over the timely execution of assigned tasks by inspectors.<br>2.42. Planning inspections and certifications of aircraft, organizations for maintenance and repair of aviation equipment.  | During inspection checks and certification surveys | Average                   |
| Aviation Inspector of the Commercial Air Transport Authority    | 2.4. Provision of public services stipulated by the Regulation on the Department for certification of civil aircraft, aviation equipment, civil aircraft maintenance and repair centers, issuance and renewal of relevant certificates using the Instructional Material.<br>2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.<br>2.17. Monitoring the execution of inspection orders to eliminate violations identified as a result of inspections and other forms of control.   | During inspection checks and certification surveys | Average                   |

|   |  |  |         |
|---|--|--|---------|
|   | 2.18. Checking the availability of certificates, permits and documents, the issuance of which is provided for by current legislation.  |  |         |
| Head of the General Aviation and Aviation Works Department - Chief Aviation Inspector | <p>2.2. Control and supervision of the compliance of the condition of the aircraft, its components, spare parts and auxiliary devices with the requirements of the airworthiness certificate issued to the operator and the requirements of the operational and technical documentation determining airworthiness.</p> <p>2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.</p> <p>2.15a. On a weekly basis, check and monitor the elimination of all comments (non-conformities) monitored by inspectors as part of their monitoring of the implementation of corrective action plans submitted by regulated organizations.</p> <p>Initiate necessary actions (enforcement measures) in the event of any deviations from the approved corrective action plan in accordance with the requirements of legislative acts.</p> <p>2.45. General management of the Commercial Aviation Airworthiness Authority, planning its activities, as well as coordination and control of the work of inspectors and distribution of applications for certification received through the e- license portal .</p> <p>2.51 Establish and implement a process for monitoring and effectively implementing the MRO surveillance plan . Monitor the implementation of the MRO surveillance program , including unannounced inspections of MRO organizations .</p>  | During inspection checks and certification surveys | Average |
| Senior Aviation Inspector of the General Aviation and Aviation Works Department       | <p>2.2. Control and supervision of the compliance of the condition of the aircraft, its components, spare parts and auxiliary devices with the requirements of the airworthiness certificate issued to the operator and the requirements of the operational and technical documentation determining airworthiness.</p> <p>2.7. Monitoring the continued airworthiness of civil aircraft.</p> <p>2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.</p> <p>2.17. Monitoring the execution of inspector orders to eliminate violations identified as a result of inspections and other forms of control.</p> <p>2.18. Checking the availability of certificates, permits and documents, the issuance of which is provided for by current legislation.</p> <p>2.18. Checking the availability of certificates, permits and documents, the issuance of which is provided for by current legislation.</p> <p>2.41. Coordination of the activities of the Directorate inspectors and distribution of incoming applications for certification, review of correspondence, control over the timely execution of assigned tasks by inspectors.</p> <p>Monitor and control the effective elimination of comments identified by the inspector based on the results of inspections in accordance with the approved corrective action plan submitted by the regulated entities. Enter data (comments and corrections) into the electronic database.</p> | During inspection checks and certification surveys | Average |
| Aviation Inspector of the General Aviation and Aviation Works Department              | <p>2.11. Conduct inspections in accordance with the procedure established by the Entrepreneurial Code and the current legislation of the Republic of Kazakhstan.</p> <p>2.17. Monitoring the execution of inspection orders to eliminate violations identified as a result of inspections and other forms of control.</p> <p>2.18. Checking the availability of certificates, permits and documents, the issuance of which is provided for by current legislation.</p>   | During inspection checks and certification surveys | Average |

Name of the object of internal analysis of corruption risks:

**2. Flight Operations Department.**

| Position subject to corruption risk                             | Official powers containing corruption risks  | Corruption risks                                   | Level of corruption risks |
|---|--|--|---------------------------|
| Director of the Department - Chief Aviation Inspector           | 6) Monitors and participates in the provision of public services in accordance with and within the established timeframes of the Rules for certification and issuance of a civil aircraft operator certificate, the Rules for admitting an operator to aviation work, and the Rules for admitting general aviation operators to flights.   | During inspection checks and certification surveys | Average                   |
| Head of Commercial Air Transport - Chief Aviation Inspector     | 4) Carries out supervision of the activities of aircraft operators within the timeframes established by the inspection supervision program, taking into account the risks to flight safety<br>6) Monitors and participates in the provision of public services in accordance with and within the established timeframes with the Rules for the certification and issuance of a civil aircraft operator certificate and the Rules for the admission to flights of general aviation operators operating aircraft with a maximum certified take-off weight of over five thousand seven hundred kilograms and helicopters with a maximum certified take-off weight of over three thousand one hundred eighty kilograms.  | During inspection checks and certification surveys | Average                   |
| Senior Aviation Inspector, Commercial Air Transport Directorate | 3) Conducts a preliminary assessment and makes a decision on the implementation of a certification survey.<br>4) Carries out supervision of the activities of aircraft operators within the timeframes established by the inspection supervision program, taking into account the risks to flight safety.<br>6) Exercises control over the provision of flight safety by individuals and/or legal entities whose activities are not subject to certification by an authorized organization in the field of civil aviation, on matters of flight operation.   | During inspection checks and certification surveys | Average                   |
| Aviation Inspector of the Cabin Crew Directorate                | 2.6. Conduct a preliminary assessment and decision on the implementation of a certification survey.<br>2.7. Personally participate in the certification of civil aircraft operators in terms of cabin crew activities.<br>2.8. Carry out supervision of the activities of aircraft operators in terms of cabin crew activities within the timeframes established by the inspection supervision program, taking into account the risks to flight safety.<br>2.9. Issue inspection orders to individuals or legal entities to eliminate violations in cases where, based on the results of monitoring and supervision, violations of the requirements of the legislation of the Republic of Kazakhstan in the field of use of the airspace of the Republic of Kazakhstan and aviation activities are identified.<br>2.10. Draw up reports on the inspection results and communicate the inspection results to the inspected party.<br>2.11. Review and agree on a plan of corrective actions for non-conformities identified during the certification survey and inspection check. | During inspection checks and certification surveys | Average                   |

|   |   |  |         |
|---|---|--|---------|
|   | <p>2.12. Agree to extend the time periods specified in the corrective action plan, provided that the civil aircraft operator provides justification for the need to change it.</p> <p>2.13. Monitor the implementation of the corrective action plan within the timeframes established by the plan.</p>   |  |         |
| Head of the General Aviation and Aviation Works Department - Chief Aviation Inspector | <p>2.13. Implement and personally participate in the certification of aircraft operators.</p> <p>2.1. To exercise control over the provision of flight safety by individuals and/or legal entities whose activities are not subject to certification by an authorized organization in the field of civil aviation, on matters of flight operation.</p> <p>2.2. Draw up reports on the inspection results and communicate the inspection results to the inspected party.</p> <p>2.3. Review and agree on a plan of corrective actions for non-conformities and violations identified during the certification survey and inspection check.</p> <p>2.4. Agree on extensions of the time limits specified in the corrective action plan, provided that the civil aircraft operator provides justification for the need to change it.</p> <p>2.5. Monitor the implementation of the corrective action plan within the timeframes established by the plan.</p> | During inspection checks and certification surveys | Average |
| Senior Aviation Inspector of the General Aviation and Aviation Works Department       | <p>3) Conducts a preliminary assessment and makes a decision on the implementation of a certification survey.</p> <p>4) Carries out supervision of the activities of aircraft operators within the timeframes established by the inspection supervision program, taking into account the risks to flight safety.</p> <p>5) Issues inspection orders to individuals or legal entities to eliminate violations in cases where, based on the results of monitoring and supervision, violations of the requirements of the legislation of the Republic of Kazakhstan in the field of use of the airspace of the Republic of Kazakhstan and aviation activities are identified.</p> <p>6) Exercises control over the provision of flight safety by individuals and/or legal entities whose activities are not subject to certification by an authorized organization in the field of civil aviation, on matters of flight operation.</p>                       | During inspection checks and certification surveys | Average |
| Aviation Inspector of the General Aviation and Aviation Works Department              | <p>3) Conducts a preliminary assessment and makes a decision on the implementation of a certification survey.</p>   | During inspection checks and certification surveys | Average |
| Head of the Passenger Cabin Safety Department - Chief Aviation Inspector              | <p>2.13. Implement and personally participate in the certification of aircraft operators, in terms of the activities of the cabin crew.</p> <p>2.14. Carry out supervision of the activities of aircraft operators, in terms of activities related to the cabin crew, within the timeframes established by the inspection supervision program, taking into account the risks to flight safety.</p> <p>2.15. Issue inspection orders to individuals or legal entities to eliminate violations in cases where, based on the results of monitoring and supervision, violations of</p>  | During inspection checks and certification surveys | Average |

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|---|--|--|---------|
|   | <p>the requirements of the legislation of the Republic of Kazakhstan in the field of use of the airspace of the Republic of Kazakhstan and aviation activities are identified.</p> <p>2.16. Draw up reports on the inspection results and communicate the inspection results to the inspected party.</p> <p>2.17. Review and agree on a plan of corrective actions for non-conformities and violations identified during the certification survey and inspection check.</p> <p>2.18. Agree to extend the time periods specified in the corrective action plan, provided that the civil aircraft operator provides justification for the need to change it.</p> <p>2.19. Monitor the implementation of the corrective action plan within the timeframes established by the plan.</p>  |  |         |
| Senior Aviation Inspector of the Passenger Cabin Safety Directorate | <p>2.6. Conduct a preliminary assessment and decision on the implementation of a certification survey.</p> <p>2.7. Personally participate in the certification of civil aircraft operators in terms of cabin crew activities.</p> <p>2.10. Draw up reports on the inspection results and communicate the inspection results to the inspected party.</p> <p>2.11. Review and agree on a plan of corrective actions for non-conformities identified during the certification survey and inspection check.</p> <p>2.12. Agree to extend the time periods specified in the corrective action plan, provided that the civil aircraft operator provides justification for the need to change it.</p> <p>2.13. Monitor the implementation of the corrective action plan within the timeframes established by the plan.</p>  | During inspection checks and certification surveys | Average |
| Aviation Inspector of the Passenger Cabin Safety Directorate        | <p>2.6. Conduct a preliminary assessment and decision on the implementation of a certification survey.</p> <p>2.7. Personally participate in the certification of civil aircraft operators in terms of cabin crew activities.</p> <p>2.8. Carry out supervision of the activities of aircraft operators in terms of cabin crew activities within the timeframes established by the inspection supervision program, taking into account the risks to flight safety.</p> <p>2.9. Issue inspection orders to individuals or legal entities to eliminate violations in cases where, based on the results of monitoring and supervision, violations of the requirements of the legislation of the Republic of Kazakhstan in the field of use of the airspace of the Republic of Kazakhstan and aviation activities are identified.</p> <p>2.10. Draw up reports on the inspection results and communicate the inspection results to the inspected party.</p> <p>2.11. Review and agree on a plan of corrective actions for non-conformities identified during the certification survey and inspection check.</p> <p>2.12. Agree to extend the time periods specified in the corrective action plan, provided that the civil aircraft operator provides justification for the need to change it.</p> | During inspection checks and certification surveys | Average |

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|--|---|--|--|
|  | 2.13. Monitor the implementation of the corrective action plan within the timeframes established by the plan. |  |  |
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Name of the object of internal analysis of corruption risks:

**3. Department of Unmanned Aircraft Systems.**

| Position subject to corruption risk                   | Official powers containing corruption risks   | Corruption risks                                   | Level of corruption risks |
|---|---|--|---------------------------|
| Director of the Department - Chief Aviation Inspector | 1. Exercises, within the limits of its competence, control over the activities of UAS operators in accordance with the requirements of legislative and regulatory legal acts of the Republic of Kazakhstan. | During inspection checks and certification surveys | Average                   |
| Senior Aviation Inspector                             | 1. Exercises, within the limits of its competence, control over the activities of UAS operators in accordance with the requirements of legislative and regulatory legal acts of the Republic of Kazakhstan. | During inspection checks and certification surveys | Average                   |
| aviation inspector                                    | 1. Exercises, within the limits of its competence, control over the activities of UAS operators in accordance with the requirements of legislative and regulatory legal acts of the Republic of Kazakhstan. | During inspection checks and certification surveys | Average                   |

Name of the object of internal analysis of corruption risks:

**4. Department of Air Navigation.**

| Position subject to corruption risk                   | Official powers containing corruption risks  | Corruption risks                                   | Level of corruption risks |
|---|--|--|---------------------------|
| Director of the Department - Chief Aviation Inspector | 13. Manages the examination of incoming documentation for the certification of air navigation organizations.<br>14. Participates in the certification of air navigation organizations as the chairman of the certification commission, as well as in conducting their inspection checks.<br>15. Participates in the provision of public services in accordance with and within the timeframes established by the Rules for the certification and issuance of a certificate of an air navigation service provider, as well as the certification requirements imposed on air navigation service providers. | During inspection checks and certification surveys | Average                   |



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| Senior Aviation Inspector ATS          | <p>1. Participates in inspection and certification audits of the air navigation service provider in terms of air traffic services (ATS).</p> <p>2. Prepares and submits to management reports on inspection and control of the activities of air navigation organizations and organizations responsible for air traffic services (ATS).</p> <p>Monitors compliance of air traffic services ( ATS ) with regulatory legal acts of the Republic of Kazakhstan and international ICAO requirements in terms of air traffic services ( ATS ).</p> <p>Participates in the provision of public services in accordance with and within the timeframes established by the Rules for certification and issuance of a certificate of an air navigation service provider, as well as certification requirements imposed on air navigation service providers.</p> <p>3. Participates in inspection and certification audits of the air navigation service provider in terms of air traffic services (ATS).</p> | During inspection checks and certification surveys  | Average |
| Senior Aviation Inspector (PANS-OPS) . | <p>Participates in inspection and certification audits of the air navigation service provider in terms of instrument flight procedure development (PANS-OPS).</p> <p>4. Participates in the provision of public services in accordance with and within the timeframes established by the Rules for the certification and issuance of a certificate of an air navigation service provider, as well as the certification requirements imposed on air navigation service providers.</p> <p>5. In order to assist the staff of the Air Navigation Department, participates in inspection and certification checks of the air navigation service provider in other areas within the competence of the Air Navigation Department.</p>  | During inspection checks and certification surveys  | Average |
| Senior Aviation Inspector (AIS/MAP).   | <p>3. Participates in inspection and certification checks of the air navigation service provider in terms of providing aeronautical information (AIS) and cartography (MAP).</p>   | During inspection checks and certification surveys. | Average |

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|--------------------|---|---|---------|
|                    | <p>4. Participates in the provision of public services in accordance with and within the timeframes established by the Rules for the certification and issuance of a certificate of an air navigation service provider, as well as the certification requirements imposed on air navigation service providers.</p> <p>5. In order to assist the staff of the Air Navigation Department, participates in inspection and certification checks of the air navigation service provider in other areas within the competence of the Air Navigation Department.</p>   |   |         |
| aviation inspector | <p>Within the limits of its competence, it exercises control and supervision over the activities of air navigation organizations and organizations responsible for meteorological support of flights (MET) of civil aviation.</p> <p>3. Participates in inspection and certification checks of air navigation organizations in terms of meteorological support for flights ( MET ) in civil aviation.</p> <p>4. Participates in the provision of public services in accordance with and within the timeframes established by the Rules for the certification and issuance of a certificate of an air navigation service provider, as well as the certification requirements imposed on air navigation service providers.</p> <p>5. In order to assist the employees of the Air Navigation Department, participates in inspection and certification checks of the air navigation service provider in other areas within the competence of the Air Navigation Department.</p> | During inspection checks and certification surveys. | Average |