

**NON-PROFIT JOINT STOCK COMPANY
“Dulaty University”**

**“APPROVED”
By the Decision of the Board of Directors
of NJSC “Dulaty University”
Minutes No. _____
Dated “ ____ ” _____ 2025**

**ANTI-CORRUPTION POLICY
Of NJSC “Dulaty University”**

Taraz, 2025

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1. Purpose and Scope of Application

1.1 This Anti-Corruption Policy of the NJSC “Dulati University” (hereinafter – the Policy and the University, respectively) has been developed in accordance with the Constitution and anti-corruption legislation of the Republic of Kazakhstan, the requirements of the international standard ISO 37001:2025 “*Anti-Bribery Management Systems – Requirements with Guidance for Use*”, and the University’s internal regulatory documents.

1.2 This Policy is the primary document defining and establishing the goals, objectives, and principles of the University’s anti-corruption activities, the requirements of the anti-corruption legislation of the Republic of Kazakhstan and obligations for its compliance, as well as measures for preventing and countering corruption within the University. It also defines liability for non-compliance with this Policy, aimed at identifying, preventing, suppressing, and minimizing the consequences of corruption at the University.

1.3 This Policy applies to all officials of the University, its branches, and college, persons equated to them, as well as University employees, regardless of their position or functional responsibilities, and is mandatory for familiarization and implementation.

1.4 The requirement to comply with this Policy also applies to individuals and legal entities cooperating with the University under civil law contracts.

1.5 The University’s internal control system for anti-corruption activities is based on the concept of three lines of defense:

- The **first line** consists of employees and departments responsible for processes in which significant corruption risks are identified.
- The **second line** is represented by the University’s **Anti-Corruption Compliance Service**.
- The **third line** is the **Internal Audit Service**, which assesses the effectiveness of existing internal controls for preventing corruption within audited processes.

1.6 This Policy shall be published on the official website of the University to ensure that employees, students, contractors, and business partners are informed about the key elements of the University’s Anti-Corruption Management System.

2. Terms and Definitions

2.1 The following terms and definitions are used in this Policy:

1. **Anti-corruption restrictions** – restrictions established by law aimed at preventing corruption offenses.
2. **Corruption** – the unlawful use by University employees of their official powers and related opportunities to obtain or derive property (or non-property) benefits and advantages for themselves or third parties, as well as the bribery of such persons through the provision of such benefits and advantages.
3. **Corruption offense** – an unlawful, culpable act (action or inaction) having signs of corruption, for which the legislation of the Republic of Kazakhstan provides administrative or criminal liability.
4. **Corruption risk** – the likelihood of circumstances or conditions arising that contribute to the commission of corruption offenses.
5. **Anti-corruption activities** – actions taken by the University within its competence to prevent corruption, including fostering an anti-corruption culture, identifying and eliminating causes and conditions conducive to corruption, as well as detecting, suppressing, disclosing, and investigating corruption offenses and mitigating their consequences.
6. **Prevention of corruption** – the University's activities aimed at studying, identifying, limiting, and eliminating the causes and conditions that contribute to corruption offenses through the development and implementation of preventive measures.
7. **Anti-corruption monitoring** – activities for collecting, analyzing, and evaluating information regarding the effectiveness of the University's anti-corruption measures.
8. **Official of the University** – a person who permanently or temporarily performs organizational-administrative or administrative-economic functions at the University.
9. **Administrative-economic functions** – the legally granted right to manage and dispose of property that is on the University's balance sheet.
10. **Organizational-administrative functions** – the legally granted right to issue orders and directives mandatory for subordinates, as well as to apply incentives or disciplinary sanctions toward subordinates.
11. **Employees** – individuals engaged in labor relations with the University.
12. **Employee equated to persons authorized to perform public functions** (hereinafter – *authorized person*) – an employee who permanently, temporarily, or by special authorization performs organizational-administrative or administrative-economic functions at the University, as well as an employee authorized to make decisions on the organization and conduct of procurements, including public procurements, or responsible for the selection and implementation of projects financed from the state budget

- and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit;
13. **Close relatives** – parents, children, adoptive parents, adopted children, full and half siblings, grandparents, and grandchildren;
 14. **Internal analysis of corruption risks** – the University’s activity aimed at identifying and studying the causes and conditions contributing to the commission of corruption offenses;
 15. **Hotline** – a system for proactive reporting of violations, created to provide employees and other interested parties the opportunity to openly or anonymously report committed or planned violations by University employees or in relation to University employees;
 16. **Code of Corporate Ethics** – an internal document of the University that establishes values, key principles, and standards of conduct aimed at developing corporate culture and strengthening the University’s reputation;
 17. **Candidates** – individuals applying for positions associated with the performance of organizational-administrative or administrative-economic functions within the University;
 18. **Counterparty** – a private business entity participating in procurements carried out by the University, a supplier of goods, works, or services, a candidate for employment, and other persons of interest to the University;
 19. **Receiving unlawful remuneration** – the unlawful receipt of property-related benefits (money, goods, material valuables, etc.) from individuals in exchange for the performance of services or work falling within the employee’s official duties, including the deliberate creation of conditions forcing the affected party to pay remuneration to prevent harm to their lawful interests;
 20. **Conflict of interest** – a contradiction between the personal interests of University officials, authorized persons, and other employees, and their official (work-related) powers, where such personal interests may lead to the failure or improper performance of their official (work-related) duties;
 21. **Authorized body for anti-corruption** – a state body responsible for forming and implementing the anti-corruption policy of the Republic of Kazakhstan, coordinating anti-corruption activities, as well as preventing, identifying, suppressing, uncovering, and investigating corruption offenses, including its territorial divisions;
 22. **Anti-corruption compliance service** – a University subdivision responsible for organizing and operating the corruption prevention system and ensuring compliance by the University and its employees with the anti-corruption legislation of the Republic of Kazakhstan;
 23. **Subjects of anti-corruption activities** – state bodies, quasi-public sector entities, public associations, as well as other natural and legal persons;
 24. **Anti-corruption clause** – a contractual condition included in civil law agreements to prevent the commission of corrupt actions during their execution;

25. **Luxury item** – items that are not essential for daily life but represent refined taste and are typically affordable only to wealthy individuals or families.

2.2. Terms used but not defined in this Policy shall be interpreted in accordance with the relevant internal regulatory documents of the University and/or the legislative and regulatory acts of the Republic of Kazakhstan.

3. Goals and Objectives of the Anti-Corruption Policy

3.1 Goals of the Policy:

1. Strengthening the reputation and enhancing trust in the University;
2. Fostering a legal culture within the University that rejects corruption, ensures the principles of academic integrity in the performance of official duties, and adheres to the principle of “zero tolerance” for corruption;
3. Minimizing the risk of involvement of the University, its employees, officials, and authorized persons in corrupt offenses;
4. Developing and implementing effective anti-corruption instruments at all levels of management;
5. Establishing a transparent corporate governance and decision-making system that provides reasonable assurance of the absence of influence from factors related to conflicts of interest between employees and the University.

3.2 Objectives of the Policy:

1. Forming among the faculty, officials, authorized persons, other employees, and students of the University an anti-corruption culture and a “zero tolerance” attitude toward corruption manifestations;
2. Ensuring transparency and openness of the University’s activities (procurement, student admissions, examinations, personnel decisions);
3. Implementing principles, policies, and rules that establish behavioral standards for employees, officials, and authorized persons of the University;
4. Conducting training and explanatory work on the requirements of the anti-corruption legislation of the Republic of Kazakhstan and this Policy among officials, authorized persons, employees, and students, and establishing the obligation of such persons to know and comply with them. Conducting anti-corruption awareness campaigns;
5. Performing continuous monitoring of all key processes reflecting the life and activities of the University, followed by identification of causes and conditions contributing to the commission of corruption offenses, and eliminating such causes and conditions (e.g., revising regulations, optimizing processes). Regular assessment and analysis of corruption risks;

6. Developing and implementing a reporting and hotline system for corruption-related and other violations (channels for anonymous reports: complaint boxes, electronic channels, trust phones, and other communication tools);
7. Conducting internal investigations for each received report and, if confirmed, applying disciplinary, administrative, or criminal measures against violators;
8. Implementing a system for recording and analyzing violations to identify recurring patterns;
9. Improving internal regulatory documents and procedures;
10. Engaging faculty, officials, authorized persons, employees, and students in implementing anti-corruption measures;
11. Developing and implementing anti-corruption measures aimed at preventing and counteracting corruption, minimizing and/or eliminating the consequences of corruption offenses;
12. Managing conflicts of interest;
13. Conducting anti-corruption reviews (expert assessments) of legal and internal documents of University units as well as local regulatory acts;
14. Applying modern anti-corruption technologies and mechanisms in the educational, disciplinary, and research processes of the University;
15. Cooperating with state bodies authorized to combat corruption and establishing partnerships with public organizations whose goal is to counter corruption;
16. Enhancing the reputation and trust in the University as an honest and transparent institution.

4. Principles of the Anti-Corruption Policy

4.1. Legality and observance of rights.

All anti-corruption measures implemented under this Policy shall strictly comply with the Constitution, the anti-corruption legislation of the Republic of Kazakhstan, and the international treaties ratified by the Republic of Kazakhstan, and shall not violate the rights of employees or students.

4.2. Zero tolerance for any manifestation of corruption.

The University adheres to a principle of complete intolerance of corruption in any form and manifestation in its activities.

This principle establishes a strict prohibition for all officials, authorized persons, academic staff, students, other employees, and persons acting on behalf of or in the interests of the University — whether directly or indirectly, personally or through intermediaries — from engaging in any form of corrupt conduct.

4.3. Principle of personal example.

The Board of Directors and the Management of the University play a key role in shaping a culture of intolerance toward corruption and in establishing an internal anti-corruption system. Members of the Board and the Management must declare

and demonstrate zero tolerance for corruption at all levels, observe and promote this principle by personal example.

4.4. Principle of transparency and openness.

1. **Accessibility of information** — all key documents, rules, standards, and reports must be available to employees, students, and the public (through the University website, notice boards, or public reports);
2. **Open discussion** — opportunities shall be provided to discuss problems and propose anti-corruption measures at meetings, conferences, and public forums;
3. **Transparency of decisions** — management decisions and resource allocations must be made openly, minimizing any “closed” or non-transparent processes;
4. **Accountability** — management and responsible persons must regularly report to the collective body and supervisory authorities.

4.5. Academic and professional integrity.

All academic and research activities must be conducted with honesty and integrity. All Rector’s grant reports, doctoral and master’s dissertations, students’ theses, and research works published at any level must undergo “Anti-Plagiarism” verification.

4.6. Inevitability and fairness of punishment.

Any manifestation of corruption must be met with an immediate response. The University guarantees the inevitability of disciplinary or legal measures against employees involved in corruption, regardless of their position, tenure, or status.

4.7. Employee involvement.

The University informs all employees, authorized persons, academic staff, and students about the provisions of anti-corruption legislation and encourages their active participation in forming and implementing internal anti-corruption standards and procedures.

4.8. Due diligence.

The University carries out due-diligence checks of third parties and job candidates before establishing or continuing any business or employment relationship, ensuring their integrity, non-tolerance for corruption, and absence of conflicts of interest.

4.9. Proportionality of measures to risks.

Anti-corruption measures must be proportionate and adequate to the level of identified risks — neither excessive nor merely formal.

4.10. Effectiveness and results orientation.

Implemented measures should produce real, tangible results rather than be formal or symbolic.

4.11. Systematic and comprehensive approach.

The University ensures the systematic and comprehensive use of managerial, organizational, informational, socio-economic, legal, and special measures to prevent and counter corruption and fraud.

4.12. Continuous control and monitoring.

The University regularly monitors corruption risks and the effectiveness of preventive and control measures, including anti-corruption expertise of internal acts regulating educational, administrative, and research processes, as well as through systematic sociological surveys and questionnaires among students.

4.13. Conflict-of-interest management.

The University undertakes measures to prevent and resolve situations in which personal interests may influence official duties.

4.14. Promotion and education.

An anti-corruption culture is fostered through training programs, awareness campaigns, and active engagement of students and employees.

4.15. Principle of prevention (prophylaxis).

Continuous preventive work is carried out by the Compliance Division and other structural units of the University to identify and neutralize corruption risks before they occur.

4.16. Cooperation and coordination.

The University ensures close interaction and cooperation with government bodies, authorized anti-corruption agencies, and other relevant institutions, coordinating joint actions in the field of corruption prevention.

5. Measures to Prevent and Counter Corruption at the University

5.1 Anti-corruption monitoring

Carrying out activities to collect, process, consolidate, analyze, and assess information concerning the effectiveness of the University's anti-corruption policy and the state of law-enforcement practice in the field of anti-corruption.

5.2 Internal Analysis of Corruption Risks (IACR)

The purpose of the IACR is to identify specific processes and areas of the University's operations in which there is a heightened likelihood that University employees may commit corruption-related offenses for personal gain; to identify

conditions facilitating such offenses and potential corruption schemes. Based on the IACR results, actions, procedures, and controls are designed to reduce significant corruption risks and enhance the effectiveness of the anti-corruption system. A registry of positions exposed to corruption risks is compiled and a corruption-risk cartogram is developed.

The IACR is conducted at least once (1) per year. It is carried out by all University units without exception—the owners of the relevant processes. The senior manager overseeing the analyzed process is responsible for identifying and assessing corruption risks and for developing mitigation measures.

When conducting the IACR, the following must be observed: (1) the Constitution of the Republic of Kazakhstan; (2) the Law “On Combating Corruption”; (3) the Model Rules for conducting internal analysis of corruption risks; (4) the Methodological Recommendations on conducting internal analysis of corruption risks approved by Order No. 488 of the Chair of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated 30 December 2022.

5.3 Adoption of the Anti-Corruption Standard

The Anti-Corruption Standard is a system of recommendations, safeguards, restrictions, and prohibitions established for the University’s activities that ensures the prevention or reduction of corruption impacts within the University.

5.4 Building an Anti-Corruption Culture

The University builds a sustainable culture of zero tolerance for corruption, academic integrity, and personal accountability.

1. **General rules of conduct.** To foster anti-corruption behavior among officials, authorized persons, and employees, the University establishes general rules and principles of conduct addressing business ethics and aimed at developing ethical, conscientious, and responsible behavior. These rules are set out in the University’s Code of Corporate Ethics.
2. **“Tone from the top.”** The Board of Directors and the Executive Board set and uphold unified anti-corruption standards by personal example. Managers at all levels must model compliance with ethical and business norms, communicate the provisions of the Code of Corporate Ethics and this Policy to staff, ensure their implementation, and build zero-tolerance to corruption within their units. Responsibility for the “tone from the top” rests with both functional and line managers.
3. **“Speak-Up.”** Every employee and student must, at the earliest opportunity, report any known facts of corruption or reasonable suspicions (including anonymously) through available channels: the compliance service or the anti-corruption hotline. The University guarantees confidentiality and protection of good-faith whistleblowers from retaliation and discrimination.

4. **Openness and stakeholder engagement.** The University regularly informs employees, students, counterparties, and the public about current standards and results of anti-corruption efforts (website, notice boards, mailings, meetings, reports). Feedback to improve the system is gathered via surveys and consultations.
5. **Training and awareness.** The University ensures appropriate and up-to-date information and training on anti-corruption issues. Awareness and training programs are periodically updated to reflect current, material information. Training is documented, including procedures, content, dates, audiences, and delivery records.
Employees upon hiring and at least annually receive information and training commensurate with their positions and risk exposure.
For students, modules on academic integrity and anti-corruption norms are embedded in the curriculum. Training is documented (programs, rosters, dates, topics).
Minimum coverage of topics includes:
 - Legal requirements and anti-corruption restrictions (gifts, conflict of interest, disclosures, etc.);
 - The Policy, procedures, and the anti-corruption management system; duties and responsibilities;
 - Corruption risks and the harm bribery/corruption can cause to students, employees, and the University;
 - How students and employees can help prevent and detect corruption and recognize red flags;
 - How and to whom students and employees should report suspicions;
 - Available resources and reporting channels;
 - The contribution of students and employees to the effectiveness of the anti-corruption management system, including the benefits of improvements and of reporting suspicions.
6. **Academic integrity.** Mandatory plagiarism checks (e.g., “Antiplagiat”), prohibition of cheating, forgery, the purchase of grades/exams, and any actions undermining the integrity of the educational process.
7. **Communications and pro-culture.** Systematic use of notice boards, memos, case studies, Integrity Days, advisor hours, student ambassadors/mentors, and themed weeks to reinforce behavior norms and “zero tolerance.”
8. **Work with counterparties.** The University’s anti-corruption standards are communicated to counterparties; contracts include mandatory provisions on compliance with anti-corruption requirements (an “anti-corruption clause”), notification of bribery attempts, and cooperation during reviews. Preference is given to partners with high ethical standards.
9. **Integration of restrictions and norms.** Officials and other employees comply with anti-corruption restrictions established by law and internal acts (including on gifts, conflicts of interest, representation expenses, charity,

and political neutrality). Enhanced requirements apply to higher-risk categories.

10. **Monitoring cultural practices and improvement.** The compliance service, together with units, regularly measures culture (surveys, communication audits, analysis of reports), evaluates the effectiveness of awareness and training via KPIs, and initiates corrective actions.
11. **Personal responsibility.** Each employee and student is personally responsible for adhering to ethics and this Policy; managers are responsible for maintaining the “tone from the top” and conditions that preclude corrupt practices. Violations entail disciplinary and other liability under law and internal acts.

5.5 HR-related measures

When hiring, the University takes measures to prevent conflicts of interest and corruption risks. In particular, it ensures mandatory checks for criminal records and past corruption offenses; analyzes information on close relatives already employed at the University to exclude nepotism or patronage; and requires accurate personal data and declarations of absence of conflicts of interest.

Employment contracts must stipulate obligations and liability for compliance with this Policy and allow for disciplinary measures for violations. Managers’ contracts must include liability for corruption and other offenses committed by their subordinates.

All new hires must, within a reasonable period, be acquainted with the University’s Policy requirements and sign a commitment to comply (as per Appendix 2 to the Policy).

5.6 Anti-corruption restrictions

Officials falling under the definition set in sub-para. 4 of para. 1 of Article 1 of the Law “On Combating Corruption” accept Anti-Corruption Restrictions under Article 12 of the Law and must comply with all requirements and obligations of the anti-corruption legislation of the Republic of Kazakhstan. (Appendix No. 1 to this Policy)

University officials to whom the Law’s Anti-Corruption Restrictions do not apply must still comply with all requirements and obligations of other University normative documents and refrain from creating preconditions for corruption. (Appendix No. 2 to this Policy)

5.7 Management of conflicts of interest

1. Managing conflicts of interest is a key component of the anti-corruption system. The University pays particular attention to preventing and resolving risks related to conflicts of interest. The University approves internal

documents governing the prevention and management of conflicts of interest.

2. Officials, authorized persons, and employees must act in the University's interests and avoid situations in which their personal (direct or indirect) interests affect the objectivity and integrity of their duties and conflict with the University's interests. Personal interest means the possibility of obtaining benefits from third parties—money, valuables, other property or pecuniary services, other property rights or advantages—for failing to perform or improperly performing official duties, for oneself or third parties.
3. Conflicts of interest may arise from relatives working together and/or participation by employees or their relatives in the equity or management bodies of third parties, from entrepreneurial activity, or from combining other paid work outside the University.
4. To prevent and manage conflicts of interest, University employees must:
 - disclose any actual or potential conflict of interest as soon as they become aware, in accordance with University procedures and internal documents;
 - take measures to prevent any possibility of a conflict of interest;
 - minimize the risk of conflicts of interest in performing their functions.
5. Officials and employees must declare conflicts of interest. If a conflict (or potential conflict) arises, they must inform their immediate supervisor and the compliance unit in writing. University management must promptly take appropriate response measures in line with internal documents on preventing and managing conflicts of interest.
6. All employees undergo annual training on conflict-of-interest matters.
7. Information on conflicts of interest and measures to control them is documented and retained in accordance with the documents governing conflict-of-interest management.

5.8 Anti-corruption review of internal University documents and drafts

Internal normative documents and drafts are analyzed to determine whether a drafter intended to conceal or lobby an insufficiently justified proposal or to mislead the University as to their true intentions.

During the review special attention shall be paid to:

1. consistency of the draft internal document with other normative legal acts or international treaties ratified by the Republic of Kazakhstan, as well as with internal normative documents;
2. the existence of parties that may benefit from adoption of the draft and identification of such benefits;
3. parties that may be affected by the draft internal document and the forms of such impact;
4. the financial justification of the draft internal document;

5. other cases where a right granted by the internal document could lead or has led to adverse consequences for the University.

5.9 Anti-Corruption Hotline

To maintain a high level of trust and to prevent and suppress corruption, the University operates an Anti-Corruption Hotline (“hotline”).

By contacting the hotline, any University employee, counterparty, or other person may, in a convenient form—including confidentially or anonymously—report known facts of corruption offenses, non-compliance with this Policy, or concerns about potential unlawful conduct, actions, or omissions by other employees, officials, representatives, counterparties, or other persons interacting with the University, contrary to this Policy’s principles and requirements.

Hotline contact details are posted on the University’s official website, on information boards, and in other publicly accessible places.

5.10 Non-retaliation and protection from sanctions

1. The University guarantees that no employee or representative will be sanctioned (including dismissal, demotion, or loss of incentive payments) for reporting alleged or known unlawful facts with corruption implications or fraud committed by any University employees or other persons.
2. The University guarantees that no employee or representative will be sanctioned (including dismissal, demotion, or loss of incentive payments) for refusing to commit a corruption offense or to act as an intermediary in bribery.
3. The University applies disciplinary and other measures where employees or representatives knowingly falsify information about corruption-related facts or mislead others with the intent to cause harm or reputational damage to other employees or representatives of the University.

5.11. Internal Reviews and Investigations of Corruption-Related Reports

Within the framework of reports received from individuals or legal entities and other notifications about alleged corruption offences, the University conducts an internal review or official investigation with the participation of relevant structural divisions vested with appropriate authority, in accordance with the University’s internal regulations.

If, as a result of the review or investigation, a fact of corruption is established, the University shall take measures to hold the responsible persons accountable, including termination of employment contracts and transfer of materials to the competent state authorities, as well as implement measures to prevent similar offences in the future by improving risk-monitoring and control procedures.

If the information is confirmed by the investigation and corresponding preventive measures have been taken (except for materials transferred to law-enforcement bodies), the Anti-Corruption Compliance Service may propose that authorized decision-makers reward individuals who have reported alleged or known unlawful acts of a corrupt nature.

If the informant requests confidentiality, such recognition shall be granted without disclosing their identity.

Rewards are provided from the University's savings funds.

5.12. Procurement of Goods, Works, and Services

1. When carrying out public procurements, a mandatory requirement is the public disclosure of information related to procurement procedures and contracts — including invitations to tender and relevant information on contract awards — to ensure potential bidders have sufficient time to prepare and submit proposals.
2. The University and its officials, employees, and representatives are prohibited from engaging or using intermediaries, partners, contractors, or other persons to perform any acts that contradict the principles and requirements of this Anti-Corruption Policy, other internal regulations, or the applicable legislation.
3. The University conducts mandatory due-diligence procedures on intermediaries, partners, and contractors to prevent or detect violations and to minimize or eliminate risks of involvement in corrupt activities.
4. To comply with these principles and requirements, the University includes **anti-corruption clauses** in contracts with intermediaries, partners, contractors, agents, and other entities.
These clauses must outline the general anti-corruption principles and procedures that both parties shall observe and specify the liability of contractors for failure to comply with the Policy's requirements. (See *Appendix 3.*)

5.13. Audit and Control

1. The University carries out internal audits of its financial and economic activities to ensure completeness and accuracy of accounting data and compliance with applicable laws and internal regulations, including the principles and requirements established by this Policy.
2. As part of its internal control procedures, the University performs periodic inspections of key operational areas — including selective audits of inventory accounting, storage, and write-off, as well as legality and

economic justification of payments and expenses — to verify supporting documentation and consistency with this Policy.

5.14. Public Disclosure

The University shall make this Policy publicly available on its official website, openly declare its intolerance of corruption, and encourage its employees, partners, and contractors to observe and promote the principles of this Policy.

Chapter 6. Rights and Responsibilities of Employees, Students, and Contractors

6.1. General Obligations

All University employees, students, and contractors (partners under agreements) must comply with this Policy, the legislation of the Republic of Kazakhstan, and internal regulations aimed at preventing and countering corruption.

6.2. Rights of Employees, Students, and Contractors

They have the right to:

1. Obtain accurate and up-to-date information on the University's anti-corruption standards and procedures;
2. Apply to the Anti-Corruption Compliance Service with statements, reports, or complaints about cases of corruption, fraud, or other violations;
3. Enjoy protection guarantees when making good-faith reports of corruption (including anonymous reports);
4. Expect honest, transparent, and fair treatment by University management and officials in all organizational, academic, and financial matters;
5. Participate in anti-corruption activities (training, seminars, lectures, discussions);
6. Refuse to carry out orders that violate the law or create conditions for corruption, provided they promptly notify management and the Compliance Service.

6.3. Responsibilities of University Employees

Employees are obliged to:

1. Comply with the legislation of the Republic of Kazakhstan and this Policy;
2. Avoid any form of participation in corrupt activities;
3. Prevent conflicts of interest and promptly report any that arise to management and the Compliance Service;
4. Neither demand nor accept gifts, money, services, privileges, or other benefits in connection with their official duties;
5. Cooperate with anti-corruption monitoring, audits, and investigations;
6. Contribute personally to fostering an atmosphere of zero tolerance toward corruption among students and colleagues.

6.4. Responsibilities of Students

Students must:

1. Uphold academic integrity — refrain from cheating, falsification, plagiarism, buying grades or exams;
2. Avoid any form of bribery toward University staff;
3. Report any known incidents of corruption within the University;
4. Diligently fulfill their academic requirements without using corrupt practices;
5. Support a culture of honesty and equal opportunity among peers.

6.5. Responsibilities of Contractors (Partners)

Contractors cooperating with the University must:

1. Comply with Kazakhstani law and anti-corruption clauses in their contracts;
2. Avoid using intermediaries or third parties to obtain unlawful advantages in dealings with the University;
3. Ensure transparency in fulfilling their contractual obligations;
4. Notify the University of any offers of improper benefits from employees or students;
5. Participate in verification and approval procedures required by the University's Anti-Corruption Policy.

Chapter 7. Role and Functions of the Anti-Corruption Compliance Service

7.1. The Anti-Corruption Compliance Service is a University subdivision responsible for organizing and maintaining the corruption-prevention system and

ensuring that the University and its employees comply with the legislation of the Republic of Kazakhstan on anti-corruption.

7.2. The Anti-Corruption Compliance Service is appointed by the Board of Directors and reports directly to it in the implementation of this Policy.

7.3. The Service operates independently of the executive body and University officials, is accountable to the Board of Directors, and acts autonomously in enforcing anti-corruption legislation of the Republic of Kazakhstan.

7.4. Goals and Objectives

1. Ensure implementation of the Anti-Corruption Policy.
2. Foster a culture of integrity and ethics.
3. Monitor compliance with laws and internal regulations.
4. Prevent, detect, and minimize corruption risks.

7.5. Functions

1. Develop and implement anti-corruption procedures and programs.
2. Organize and operate the hotline and reporting channels (both anonymous and open).
3. Conduct internal analyses and investigations of alleged violations.
4. Prepare proposals for corrective and preventive measures.
5. Maintain journals and registers (complaints, audits, investigations, risks, training).
6. Inform the Rector and Board of Directors about the results of its activities.

7.6. Powers of the Anti-Corruption Compliance Officer

1. Right of Access and Requests

- Unrestricted access to all internal documents, data, and systems related to the University's financial, administrative, and academic activities.
- Right to request documents, certificates, explanations, and other information from any departments or officials.
- Access to confidential information as required for monitoring or investigations.

2. Right of Control and Monitoring

- Carry out regular and ad-hoc monitoring of corruption risks across all structural divisions.
- Verify compliance with the Anti-Corruption Policy and other internal acts.
- Maintain registers of risks, reports, investigations, and response measures.

3. Right to Initiate and Conduct Investigations

- Initiate internal checks and investigations into corruption, academic-integrity violations, or abuse of authority.
- Engage experts and specialists (legal, audit, IT or external consultants).
- Submit recommendations on disciplinary actions against offenders.

4. Right to Suspend Risky Actions

- Suspend transactions, tender procedures, appointments, or HR decisions pending review when corruption is reasonably suspected.
- Initiate extraordinary audits or reviews of specific operations.

5. Right of Escalation and Reporting

- Directly inform the Board of Directors, Management Board, or Rector about identified violations and risks.
- Provide regular (quarterly / annual) reports on monitoring, investigations, and risk-mitigation results.
- Escalate cases to state bodies (e.g. Anti-Corruption Agency, Ministry of Science and Higher Education RK) if criminal or administrative elements are detected.

6. Right to Train and Advise

- Organize and conduct training for staff, faculty and students on anti-corruption, academic integrity and compliance.
- Develop and implement guidelines, manuals and information materials.
- Advise employees on conflict-of-interest prevention and ethical conduct.

7. Right to Resources

- Request and use financial and organizational resources necessary for compliance functions.
- Participate in budget planning for “Anti-Corruption Activities.”

8. Right to Protect Whistleblowers

- Guarantee anonymity and protection of whistleblowers from retaliation or discrimination.
- Take measures to prevent any form of reprisal against employees who report violations.

7.7. Responsibility

The Compliance Officer bears personal responsibility for the quality and timeliness

of the functions assigned under Kazakh legislation, employment contract, and job description.

7.8. Cooperation

1. With University divisions;
2. With state authorities;
3. With public and expert organizations (as needed).

7.9. Reporting and Control

1. Quarterly and annual reports to the Rector and Board of Directors.
2. Integration of results into the University's overall monitoring system.
3. Evaluation of the Compliance Service's effectiveness based on KPI.

Chapter 8. Gifts and Representation Expenses

8.1. Officials who have accepted anti-corruption restrictions must follow the requirements of Kazakh anti-corruption law when receiving gifts.

8.2. Gifts given on behalf of the University to other persons or organizations, as well as gifts received by employees in connection with their work at the University, and any representation expenses (including business hospitality and promotion activities) must meet the following criteria:

1. Be directly related to legitimate University objectives;
2. Be reasonable, proportionate, and not luxurious;
3. Avoid creating reputational risks or informal controls regarding gifts or expenses;
4. Not contradict Kazakh anti-corruption legislation, this Policy, or internal acts;
5. Not constitute compensation or inducement (for action, inaction, favor, decision, or influence).

8.3. Prohibited Gifts

1. Cash or non-cash monetary equivalents from the University or its employees;
2. Gifts from subordinates to supervisors (except intellectual property items);
3. Gifts from students, undergraduates or doctoral students to faculty members (except intellectual property items).

8.4. Students and learners are prohibited from organizing receptions or banquets for faculty during exam periods.

8.5. It is prohibited to give, offer or promise gifts on behalf of the University to public officials or persons performing managerial functions (in the form of money, securities, property, services or rights) for acts or omissions connected with their official position.

8.6. The University must maintain a registry of gifts given or received on its behalf by employees or representatives.

Chapter 9. Interaction

9.1. The University provides safe, confidential, and accessible channels for officials, employees, and representatives to report corruption incidents or contact the Anti-Corruption Compliance Service, including information about third-party or colleague violations.

9.2. The University welcomes proposals to improve anti-corruption procedures and controls.

9.3. To ensure a proper level of anti-corruption awareness, new employees receive introductory briefings on this Policy and related documents.

9.4. Any employee or other person who has concerns or doubts about the legitimacy of their own actions or those of others (employees, officials, representatives, contractors, or partners) may report their concerns to their immediate supervisor or the Anti-Corruption Compliance Officer.

9.5. The University refrains from paying any expenses on behalf of public officials of the Republic of Kazakhstan, officials of international organizations, or their close relatives (in their interest) for the purpose of obtaining commercial advantages or patronage, regardless of amount.

Chapter 10. Participation in Charitable Activities

The University shall not finance or participate in charitable projects for the purpose of obtaining commercial advantages.

Chapter 11. Participation in Political Activities

The University shall not finance political parties, organizations, movements, or individual political figures for the purpose of obtaining commercial advantages or general patronage.

Chapter 12. Persons Responsible for the Implementation of the Policy

12.1. The Chairperson of the Management Board – Rector of the University is responsible for the implementation and enforcement of this Policy.

The Rector shall ensure that all employees of the University comply with the requirements of this Policy, the applicable anti-corruption legislation of the Republic of Kazakhstan, and internal regulatory acts aimed at preventing corruption.

12.2. The **Anti-Corruption Compliance Service** is responsible for ensuring the implementation of anti-corruption measures and this Policy. The Service shall:

1. Organize work on the prevention and counteraction of corruption in accordance with the Policy;
2. Prepare and submit for approval by the University Management draft internal regulatory acts aimed at implementing the Policy;
3. Ensure that the University adopts the necessary internal acts and implements administrative, technical, and other measures to guarantee the independent operation of the Anti-Corruption Compliance Service.

Chapter 13. Liability for Non-Compliance with the Policy

13.1. Officials, employees, and other persons having contractual relations with the University must comply with the requirements of this Policy.

13.2. Each employee, official, and representative of the University shall, upon signing an employment or service contract, be acquainted against signature with this Anti-Corruption Policy and with internal regulatory acts on corruption prevention and control adopted by the University.

13.3. Officials and employees of the University, regardless of position, shall bear responsibility established by the legislation of the Republic of Kazakhstan and the University's internal regulations for failure to comply with the principles and requirements of this Policy, as well as for the acts (or omissions) of subordinates that violate these principles and requirements.

Chapter 14. Cooperation with Law-Enforcement Authorities

14.1. Cooperation with law-enforcement agencies is an important indicator of the University's commitment to its declared anti-corruption standards of conduct.

14.2. The University publicly undertakes to:

1. Report to law-enforcement bodies any known instances of corruption or other offenses;
 2. Refrain from applying any sanctions against officials or employees who, in good faith, have reported to law-enforcement authorities information about corruption or other offenses that became known to them in the course of performing their official duties;
 3. Prevent any unlawful interference by University officials, employees, or representatives in the activities of law-enforcement bodies during anti-corruption operations;
 4. Provide assistance to law-enforcement agencies in conducting activities related to corruption prevention and suppression.
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Chapter 15. Final Provisions

15.1. Amendments and additions to this Policy shall be made as necessary.

15.2. The content of the Policy must be communicated to all University employees in accordance with procedures established by internal regulations.

15.3. Heads of structural subdivisions of the University shall be responsible for ensuring that their subordinates are familiar with this Policy.

15.4. This Policy shall enter into force on the date of its approval by the decision of the University's Board of Directors.

For officials and persons equated to those authorized to perform public functions

Statement on Acceptance of Anti-Corruption Restrictions

I, _____
(Full name and position),

hereby, in accordance with the requirements of the legislation of the Republic of Kazakhstan on combating corruption and the *Anti-Corruption Policy* of the NAO “Taraz University named after M. H. Dulati,” and in order to prevent actions that may lead to the use of my powers for personal, group, or other non-official interests, voluntarily undertake to comply with the following **anti-corruption restrictions**:

1. **Engaging in incompatible activities:** I will not perform work or other activities that conflict with my official duties.
2. **Prohibition of joint service (employment)** of close relatives, spouses, and in-laws.
3. **Execution of official duties** only in the absence of a conflict of interest.
4. **Prohibition on the use of official or other non-public information** for the purpose of obtaining material or non-material benefits for myself or others.
5. **Prohibition on accepting gifts, material rewards, or services** by me or members of my family for acts (or omissions) in favor of the persons providing them, if such acts fall within my official powers or if, by virtue of my position, I can facilitate such acts (or omissions).
6. **Prohibition on opening or owning accounts (deposits)** in foreign banks located outside the Republic of Kazakhstan, or on storing cash and valuables in such banks.
7. **Prohibition on participating in gambling and/or betting** in gambling establishments covered by the Law of the Republic of Kazakhstan “On Gambling Business,” as well as in any gambling or betting activities conducted outside authorized venues or via telecommunications networks, including the Internet.
8. **Non-acceptance** of the above anti-corruption restrictions by officials of the University shall result in refusal of appointment or dismissal from office.
Failure to comply, if containing elements of a criminal or administrative offense, shall constitute grounds for termination of powers.

I hereby confirm that I have read, understood, and undertake to comply with these anti-corruption restrictions.

Date: “___” _____ 2025 (Signature)

ACKNOWLEDGMENT FORM

This form is used to confirm that you have thoroughly and carefully reviewed, understood, and hereby commit to strictly adhere to the **Anti-Corruption Policy** of the **Non-Profit Joint Stock Company “Taraz University named after M.H. Dulaty”** (hereinafter – the *Policy*) and the **Law of the Republic of Kazakhstan dated November 19, 2015 No. 410-V “On Combating Corruption”** (hereinafter – the *Law*).

University officials and employees must complete and sign this acknowledgment form immediately after the Policy’s adoption, and newly hired employees must do so upon commencing their employment and/or official duties at the University.

For University employees:

Please fill out this form, sign it, and submit the printed copy to the **Human Resources Department** for inclusion in your personnel file.

From the moment you begin performing your professional duties, you are required to carefully study, understand, and fully comply with the provisions of the Policy.

Please confirm by signing in the corresponding boxes:

№	Confirmation Statement
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- | | |
|---|--|
| 1 | I confirm that I have read and understood the Anti-Corruption Policy. |
| 2 | I undertake to conscientiously comply with the Policy. |
| 3 | I have been informed that, in case of violation of the Policy, I may be held liable, including dismissal from my position. |

Full Name: _____

Date: «___» _____ 2025 г.

Signature: _____

ANTI-CORRUPTION CLAUSE

1. The *Non-Profit Joint Stock Company “Taraz University named after M.H. Dulaty”* (hereinafter referred to as the “University”) informs the other Party to this Agreement of its obligation to comply with the legislation of the Republic of Kazakhstan on combating corruption, norms of business ethics and integrity, and principles of fair competition.
2. In performing their obligations under this Agreement, the Parties shall not engage in, or induce others to engage in, any actions that violate or facilitate the violation of the laws of the Republic of Kazakhstan for the purpose of obtaining any unlawful advantage or achieving other improper goals.
3. Corruption offenses include intentional acts defined in paragraph 29 of Article 3 of the Criminal Code of the Republic of Kazakhstan, as well as commercial bribery or other unlawful use by an employee of a Party of his or her official position against the legitimate interests of the Parties to obtain benefits in the form of any material, physical, or moral advantages, or other property rights for themselves or third parties, or the unlawful provision of such benefits to the said person by other individuals, and the receipt of other property benefits and advantages, in accordance with the anti-corruption legislation of the Republic of Kazakhstan or the country of residence and/or business operations of the Party.
4. The Parties agree to refrain from offering incentives to employees of the other Party that may place them in a position of dependence and are aimed at securing the performance of any actions in favor of the incentivizing Party.
5. The Parties shall provide mutual assistance to each other for the purpose of preventing corruption.
6. In accordance with paragraph 1 of Article 26 of the Law of the Republic of Kazakhstan “*On Combating Corruption*” (hereinafter – the Law), any transactions or agreements concluded as a result of corruption offenses shall be deemed invalid by a court in accordance with the procedure established by law, or by the persons authorized to annul (terminate) the relevant acts, or by the court at the request of interested parties or the prosecutor.
7. In accordance with paragraph 2 of Article 26 of the Law, acts adopted and actions performed as a result of corruption offenses are grounds for their cancellation (recognition as invalid) by the persons authorized to annul (terminate) the relevant acts, or by the court at the request of interested parties or the prosecutor.
8. In accordance with paragraph 1 of Article 24 of the Law, any person possessing information about a planned, ongoing, or committed corruption offense must inform their superior and/or the management of the state body or organization in which they are employed, and/or the authorized state bodies.