Appendix No. 4
“APPROVED”
By decision of the Board of Directors
Non-profit Joint Stock Company
“M.Kh. Dulaty Taraz University”
Minutes No. ______
Dated “___” September 2025

ПРОЕКТ

Rules for Conducting Internal Investigations at the Non-Commercial Joint Stock Company “Taraz University named after M.Kh. Dulaty”

Taraz 2025

Chapter 1. General Provisions

1.1. These Rules for Conducting Internal Investigations at the Non-Commercial Joint Stock Company "Taraz University named after M.Kh. Dulaty" (hereinafter – the Rules) are developed in accordance with the Anti-Corruption Policy of the NCJSC "Taraz University named after M.Kh. Dulaty" (hereinafter – the University) and the requirements of the international standard ISO 37001:2025. They define the procedure for conducting internal investigations by the University's Anti-Corruption Compliance Service (hereinafter – ACCS) in relation to employees of the University regarding facts of:

1. unlawful actions containing signs of corruption;
2. theft or attempted theft of funds, material, or intellectual property of the University using official position;
3. damage to the University's property, including through the delivery of poor-quality goods, performance of works or services, or other actions detrimental to the University;
4. provision/receipt of illegal monetary remuneration;
5. abuse or misuse of official powers;
6. fraudulent actions by faculty toward students, undergraduates, doctoral candidates, or other persons;
7. conflicts of interest.

1.2. The purpose of internal investigation is to identify causes and conditions that facilitated violations, determine the responsible persons, ensure the principle of inevitability of liability, and take preventive measures to avoid similar incidents in the future.

1.3. Terms used in these Rules:

- **Internal investigation** – open activities for collecting and verifying materials, information, and facts in oral, written, or other form regarding an incident, analyzing them, and preparing a report with proposals.
- **Damage** – negative consequences incurred by the University (including lost profits) and expenses for restoring violated rights.
- **Persons of "high corruption risk"** – the Rector, members of the Board, and the Board of Directors.
- **Persons of "low corruption risk"** – deans, deputy deans, heads of departments, directors of units, procurement officials, teaching and administrative staff, auxiliary staff, and students.

Chapter 2. Grounds and Organization of Internal Investigations

2.1. Grounds for initiating an internal investigation include:

1. complaints or applications from employees, students, or citizens;
2. letters, materials, or instructions from government bodies or legal entities;

3. instructions from the Board of Directors or its members;
4. instructions from the Chair of the Board – Rector;
5. memos and reports from heads of structural divisions;
6. publications in mass media;
7. results of internal corruption risk analysis;
8. results of external audits and inspections by state authorities;
9. analysis of information requiring verification.

2.2. Employees of University divisions may be involved in investigations if necessary.

2.3. The following may not be involved:

- the person under investigation;
- their direct subordinates or supervisors;
- employees with any affiliation or conflict of interest;
- other individuals directly involved in the misconduct.

2.4. During the investigation, the ACCS must establish:

1. whether the alleged misconduct actually occurred;
2. the place, manner, and circumstances of the misconduct;
3. the persons directly or indirectly involved;
4. which legal or internal rules were violated;
5. objective and subjective reasons for the violation.

Chapter 3. Rights and Duties

3.1. Rights of the person under investigation:

- to know the grounds for the investigation;
- to provide written explanations;
- to submit motions and petitions;
- to present documents and evidence;
- to name witnesses;
- to review the final report;
- to appeal the conclusion to higher bodies.

3.2. Duties of investigators:

- to respect the rights of all participants;
- to base conclusions only on collected evidence;
- to comply with corporate ethics;
- to ensure confidentiality of personal and sensitive data;
- to protect whistleblowers’ identities and safety.

3.3. Rights of investigators:

- to access relevant documents and regulations;
- to interview staff and other persons, obtaining oral and written statements (refusal is documented and reported to the Rector);
- to consult with University staff;
- to request data from government agencies and organizations;

- to inspect relevant premises, equipment, or materials, with findings documented;
- to use audio, video, and photography in line with the law.

Chapter 4. Timeframe of Investigations

4.1. Investigations begin upon registration in the Journal of Internal Investigations maintained by the ACCS.

4.2. The standard duration is **30 working days** from the date of registration.

4.3. The investigation may be suspended if the subject is:

- on vacation, business trip, sick leave, or treatment;
- absent for other valid reasons;
- pending expert evaluation.

4.4. The term resumes upon the employee's return or after the expert conclusion.

Chapter 5. Completion of Investigation

5.1. Upon conclusion, the investigator prepares a report including:

1. names and positions of investigators and grounds for investigation;
2. facts established;
3. causes and conditions contributing to the incident;
4. proposals to eliminate causes and prevent recurrence;
5. recommendations on holding responsible persons accountable and compensation of damage;
6. if no guilt is established, clarification of the person's right to defend their honor and appeal;
7. signatures of involved persons; in case of disagreement, their objections are reviewed.

5.2. All documents collected are attached.

5.3. The report is signed by the Head of ACCS (compliance officer) and forwarded:

- for low-risk persons – to the Rector;
- for high-risk persons – to the Board's HR and Remuneration Committee and then the Board of Directors.

5.4. The Rector issues instructions for implementation or returns the case for further investigation.

5.5–5.6. The investigation is considered closed upon approval by the Rector or the Board of Directors.

5.7. If criminal elements are found, materials are referred to law enforcement.

5.8. Completed cases are stored in the ACCS for 1 year, then archived.

Chapter 6. Basis and Procedure for Incentives

6.1. If a whistleblower reports corruption or its risks, the ACCS may submit a proposal to reward them.

6.2. The Rector (or Board of Directors for high-risk cases) decides within 3 working days.

6.3. Incentives may include: one-time bonuses, certificates, or letters of appreciation.

- No rewards are given for minor violations not resulting in liability.
- For significant reports, rewards may be financial or honorary.
- Active participation in anti-corruption events may also be rewarded.

6.4. Bonuses must be paid within 10 working days after the decision.

6.5. Cases with criminal elements follow Government Resolution №1131 (30.12.2015).

Chapter 7. Responsibility

7.1. Investigators are personally responsible for objectivity and accuracy.

7.2. Falsification, forgery, or disclosure of confidential data entails disciplinary, administrative, or criminal liability in accordance with the laws of the Republic of Kazakhstan.