

**APPROVED by the  
Decision of the Board of Directors  
of Abylkas Saginov Karaganda  
Technical University NJSC  
Dated February 12, 2025  
(Minutes No. 1/45)**

## **Regulations on the Anti-corruption Compliance Service of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University**

### **Chapter 1. General provisions**

1. These Regulations on the Anti-corruption Compliance Service of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University (hereinafter referred to as the Company) have been developed in accordance with paragraph 3 of Article 16 of the Law of the Republic of Kazakhstan "On Combating Corruption", the Order of Chairman of the Agency of the Republic of Kazakhstan for Combating Corruption (Anti-corruption Service) dated March 31, 2023 No. 112 "On approval of the Model Regulations on Anti-corruption Compliance Services in quasi-public sector entities" and the other regulatory legal acts of the Republic of Kazakhstan.

2. These Regulations define the goals, objectives, principles, functions and powers of Anti-corruption Compliance Service at the Company.

3. These Regulations on the Anti-corruption Compliance Service shall be published on the official Internet resource of the Company and brought to the attention of all the employees.

4. The following basic concepts are used in these Regulations:

1) anti-corruption compliance: a function to ensure compliance by quasi-public sector entities and their employees with the legislation of the Republic of Kazakhstan on combating corruption;

2) internal analysis of corruption risks: identification and studying the causes and conditions that contribute to the commission of corruption offenses;

3) conflict of interest: a contradiction between the personal interests of persons holding a responsible public position, persons authorized to perform public functions, persons equivalent to them, officials and their official powers, in which the personal interests of the said persons can lead to their failure to perform and (or) to improper performance of their official duties;

4) corruption offence: an unlawful guilty act (action or inaction) with signs of corruption, for which administrative or criminal liability is established by law;

5) corruption risk: the possibility of occurrence of causes and conditions conducive to the commission of corruption offences;

6) corruption prevention: the activities of anti-corruption entities to study, identify, limit and eliminate the causes and conditions conducive to the commission of corruption offences, by developing and implementing a system of preventive measures;

7) authorized anti-corruption body: a state body that carries out the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of combating corruption, as well as the prevention, identification, suppression, disclosure and investigation of corruption offences, and its territorial divisions.

5. The main objective of the Anti-corruption Compliance Service at the Company is to ensure the organization and its employees compliance with the legislation of the Republic of Kazakhstan on combating corruption.

Hereby, the head of the Anti-corruption Compliance Service is determined taking into account the potential conflict of interest.

6. The Anti-corruption Compliance Service as a structural subdivision of the the Company is determined by the decision of the Board of Directors.

7. The Anti-corruption Compliance Service exercises its powers independently of the executive body, officials of the Company, is accountable to the Board of Directors and is independent in ensuring compliance with the requirements of the legislation of the Republic of Kazakhstan on combating corruption.

8. Methodological support to the Anti-corruption Compliance Service is provided by the authorized body for combating corruption and its territorial divisions.

9. It is not allowed combining the functions of the Anti-corruption Compliance Service with the functions of the other structural divisions of the Company.

10. In the event that the Law and international standards in the field of combating corruption establish requirements and approaches to organizing anti-corruption compliance that are not provided for by this Regulation, these requirements and approaches shall be approved by the Board of Directors of the Company.

## **Chapter 2. Objectives, tasks, principles, functions, and powers of the Anti-corruption Compliance Service**

11. The main objective of the Anti-corruption Compliance Service is to ensure that the Company and its employees comply with the legislation of the Republic of Kazakhstan on combating corruption, as well as to monitor implementation of anti-corruption measures.

12. Objectives of the Anti-corruption Compliance Service are as follows:

1) ensuring implementation of tools for prevention of corruption offenses by the Company and its employees;

2) effective implementation of the system of measures to combat corruption at the Company;

3) ensuring the implementation of an internal analysis of corruption risks at the Company;

4) ensuring compliance with external regulatory requirements and best international practices on anti-corruption issues;

5) ensuring compliance with the basic principles of combating corruption in accordance with the law.

13. When implementing anti-corruption compliance functions, the Company is guided by the following principles:

1) sufficiency of powers and resources allocated to perform anti-corruption compliance functions;

2) management interest in the effectiveness of anti-corruption compliance;

3) information openness of the Anti-corruption Compliance Service;

4) independence of the Anti-corruption Compliance Service;

5) continuity of anti-corruption compliance;

6) improvement of anti-corruption compliance;

7) continuous improvement of the competencies of specialists implementing anti-corruption compliance functions.

14. Functions of the anti-corruption compliance service include the following:

1) ensuring the development of:

- internal anti-corruption policy of the Company;

- instructions on anti-corruption for the Company employees;

- internal policy for identifying and resolving conflicts of interest at the Company;

- anti-corruption standard, in accordance with the legislation on anti-corruption;

- internal action plan on anti-corruption issues;
  - facts or possible violations of anti-corruption legislation;
  - a document regulating issues of corporate ethics and behavior;
- 2) collects, processes, summarizes, analyzes and evaluates information related to the effectiveness of the anti-corruption policy at the Company;
  - 3) coordinates the internal analysis of corruption risks in the activities of the Company in accordance with the Model Rules for Conducting Internal Analysis of Corruption Risks approved by the Order of Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-corruption dated October 19, 2016 No. 12 "On Approval of the Model Rules for Conducting Internal Analysis of Corruption Risks";
  - 4) participates in the external analysis of corruption risks in the activities of the Company conducted by a joint decision of the top managers of the authorized body for combating corruption and the Company;
  - 5) monitors the identified corruption risks at the Company and measures taken to mitigate and to eliminate them;
  - 6) conducts explanatory events on the issues of combating corruption and formation of anti-corruption culture at the Company;
  - 7) organizes anti-corruption training seminars for the Company employees;
  - 8) ensures control over the Company employees compliance with the anti-corruption policy and the issues of corporate ethics and behavior;
  - 9) promotes the formation of culture of relationships that corresponds to generally accepted moral and ethical standards in the the Company team;
  - 10) ensures compliance by persons equivalent to persons authorized to perform state functions with financial control measures and anti-corruption restrictions established by the Law, within the competence of the Anti-corruption Compliance Service;
  - 11) develops and monitors implementation of the internal action plan on anti-corruption issues by the Company structural divisions;
  - 12) takes measures to identify, to monitor and to resolve conflicts of interest, including those in matters of employment, procurement and business processes of the Company;
  - 13) takes measures to regulate the issues of giving and receiving gifts at the Company;
  - 14) carries out a comprehensive check of counterparties reliability;
  - 15) conducts official inspections based on appeals (complaints) about the facts of corruption at the Company and/or participates in them;

16) monitors and analyzes changes in anti-corruption legislation, judicial practice in cases related to corruption at the Company;

17) evaluates the effectiveness of implementing anti-corruption measures by structural divisions and employees of the Company;

18) hears the information from structural divisions and employees of the Company of the issues of combating corruption;

19) makes recommendations to Chairman of the Board, Rector of the Company on eliminating identified corruption risks, increasing the effectiveness of internal processes for organizing the activities of the Company;

20) depending on the specifics of the the Company activities, performs functions related to compliance, business ethics, and sustainable development, if such functions do not affect independence and do not provoke a conflict of interest;

21) interacts with the authorized body for combating corruption and government agencies, quasi-public sector entities, public associations, as well as the other individuals and legal entities.

15. Based on the decision of the Board of Directors, the head of the Anti-corruption Compliance Service is appointed and the term of his or her office, the amount of remuneration, and terms of remuneration are determined.

16. The head of the Anti-corruption Compliance Service ensures the fulfillment of the tasks assigned to the Anti-corruption Compliance Service.

17. By the decision of Chairman of the Management Board, Rector of the Company, upon the submission of the head of the Anti-corruption Compliance Service, the structure, the staffing levels (quantity), the term of office, the work procedure, and the other terms of remuneration of the employees of the Anti-corruption Compliance Service are determined and they are appointed.

18. The functional duties, rights and responsibilities of the head and employees of the Anti-corruption Compliance Service are determined by job descriptions or documents defining the official rights and duties of the employees developed on the basis of these Regulations on Anti-corruption Compliance Service and approved by Chairman of the Board, Rector of the Company.

19. The head of the Anti-corruption Compliance Service submits to the Board of Directors of the Company a proposal on the structure and the staffing schedule of the Anti-corruption Compliance Service.

20. Documents and requests sent on behalf of the Anti-corruption Compliance Service to the other structural divisions of the Company, departments and subordinate organizations on the issues within the competence of the Anti-corruption Compliance Service are signed by the head of the Anti-corruption Compliance Service.

21. The head and employees of the Anti-corruption Compliance Service must constantly improve their professional qualifications by participating in training events held by authorized bodies and professional organizations in the field of compliance.

22. The Anti-corruption Compliance Service, as part of its activities:

1) requests and receives the information and materials from the structural divisions of the Company, including those constituting commercial and official secrets;

2) initiates submission of the issues related to their competence for consideration by the Board of Directors, the Management Board of the Company;

3) conducts official investigations based on incoming reports of possible corruption offenses or violations of the legislation of the Republic of Kazakhstan on combating corruption;

4) requires the heads of divisions and the other employees of the Company to submit written explanations as part of official investigations;

5) develops proposals for improving the anti-corruption legislation of the Republic of Kazakhstan and sends them to the authorized body for combating corruption;

6) participates in the development of draft internal documents within the limits of its competence;

7) provides the information channels for the Company employees to report facts of the presence or potential possibility of violation of anti-corruption legislation at the Company, or to make proposals to improve the effectiveness of measures to combat corruption at the Company;

23. In carrying out its activities, the Anti-corruption Compliance Service:

1) maintains the confidentiality of information of the Company and its affiliates, insider information that became known during the period of performing anti-corruption compliance functions, if it does not contain data on a corruption offense being prepared and (or) committed;

2) ensures the confidentiality of persons who have applied regarding suspected or actual facts of corruption, violations of the corporate code of ethics and the other internal documents on anti-corruption issues at the Company;

3) promptly informs the Board of Directors of the Company any situations related to the presence or potential possibility of violating anti-corruption legislation;

4) informs the authorized body for combating corruption of the known cases of corruption offenses being prepared, or committed;

5) does not interfere with the established operating mode of the Company;

6) observes official and professional ethics.

24. The employees of the Anti-corruption Compliance Service must not:

- 1) participate in inspections of processes in which they participated during the previous three years;
- 2) participate in activities that could damage the impartiality of the inspection or be perceived as causing such damage;
- 3) use confidential information for personal interests;
- 4) violate business ethics standards;
- 5) accept gifts and use services that can damage the independence, objectivity and impartiality of the Anti-corruption Compliance Service or that can be perceived as causing such damage;
- 6) participate in inspections, internal investigations and the other events that can lead to a conflict of interest.

25. The Company management must:

- 1) facilitate the development of an effective environment for implementing the activities of the Anti-corruption Compliance Service, assist in the fulfillment of its goal, objectives, functions and responsibilities, in the implementation of rights;
- 2) implement administrative (organizational and technical) support for the activities of the Anti-corruption Compliance Service, including provision of the capabilities, assets and resources necessary for its activities, including information systems and applications (access to the necessary databases) and the other goods, works, services;
- 3) provide the head and employees of the Anti-corruption Compliance Service with training and certification opportunities on the activities of the Anti-corruption Compliance Service, social and communication skills and competencies.

26. The interaction of the Anti-corruption Compliance Service with the structural divisions of the Company is based on mutual politeness and correctness in work.

27. Employees of the structural divisions of the Company shall assist the Anti-corruption Compliance Service by the following:

- 1) providing documents and information needed for implementing the tasks and functions of the Anti-corruption Compliance Service, taking into account the features established by subparagraph 1) of paragraph 13 of these Regulations;
- 2) objective discussion of identified risks and violations;
- 3) joint resolution of the emerging issues and problems.

### **Chapter 3. Anti-corruption Compliance Service reporting**

28. The Anti-corruption Compliance Service sends the information of the anti-corruption measures taken at the Company to the authorized anti-corruption body on a quarterly basis.

At the request of the authorized anti-corruption body, the additional information of the anti-corruption measures taken at the Company is sent.

29. The Anti-corruption Compliance Service reports to the Board of Directors annually and, if needed, within the other timeframes.

In the event of possible corruption offenses on the part of Chairman of the Management Board, Rector of the Company, the Anti-corruption Compliance Service applies to the authorized state bodies in accordance with paragraph 1 of Article 24 of the Law of the Republic of Kazakhstan "On Combating Corruption".

### **Chapter 4. Terms of remuneration and bonuses of the head of the Anti-corruption Compliance Service**

30. The amount of the official salary of the head of the Anti-corruption Compliance Service is determined by the decision of the Board of Directors of the Company and is reflected in the employment contract; the other payments of a compensatory, incentive and (or) stimulating nature are made in accordance with the legislation of the Republic of Kazakhstan, these Regulations and the other legal acts of the Company.

31. When providing annual paid labor leave to the head of the Anti-corruption Compliance Service, a health benefit is paid in the amount of one monthly official salary.

32. By the decision of the Board of Directors, the head of the Anti-corruption Compliance Service is allowed to receive quarterly bonuses based on the results of work for the reporting period, in the event of high-quality and effective performance of his functional duties, in the amounts and on the terms determined by the relevant internal documents of the Company.

33. In honor of celebration of national, state and professional holidays of the Republic of Kazakhstan, due to savings in the wage fund, the decision of the Board of Directors of the Company allows for the awarding of a bonus to the head of the Anti-corruption Compliance Service, while the total annual amount of this bonus is no more than ten minimum wages established by the legislation of the Republic of Kazakhstan on the republican budget for the relevant financial year.



34. The award is made on the basis of the Order of Chairman of the Board, Rector or the person performing his duties.