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## REGULATION

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## ON REPORTING SUSPICIONS

**Karaganda**

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## **1 Scope**

This Regulation on Reporting Suspicions (hereinafter referred to as the Regulation) establishes the procedure for reporting suspicions of committing/attempting to commit corruption offenses, including bribery, violations or weakening of the anti-corruption management system, including inappropriate behavior leading to unethical business practices at Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University (hereinafter referred to as the Company).

## **2 Regulatory references**

This documented procedure uses references to DP X-01 “Management of Documented Information”.

## **3 Terms, definitions and abbreviations**

The following terms, definitions and abbreviations are used in this documented procedure:

Corruption offense is an unlawful guilty act (action or inaction) that has signs of corruption, for which administrative or criminal liability is established by law;

Corruption is the illegal use by persons performing managerial functions of their official (official) powers and related opportunities in order to obtain or extract personally, or through intermediaries, property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons through providing benefits and benefits;

Bribery is offering a bribe, promising a bribe, giving a bribe, receiving a bribe, mediation in bribery for the action (inaction) of a person authorized to perform government functions, or a person equivalent to him, or a person holding a responsible public position, or an official, as well as an official of a foreign state or an international organization, is a crime under the criminal legislation of the Republic of Kazakhstan;

Receiving a bribe is the receipt by a person authorized to perform government functions, or a person equivalent to him, or a person holding a responsible public position, or an official, as well as an official of a foreign state or international organization, personally or through an intermediary, of a bribe in the form of money, securities, other property, rights to property or benefits of a property nature for themselves or other persons for actions (inaction) in favor of the briber or persons represented by him, if such actions (inaction) are within the official powers of this person, or he, by virtue of his official position, can contribute such actions (inaction), as well as for general patronage or connivance;

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Mediation in bribery is direct transfer of a bribe (illegal reward) on behalf of the bribe giver or bribe recipient, or other assistance to the bribe giver and/or bribe recipient/participants in reaching or implementing an agreement between them on receiving and giving a bribe;

Anti-corruption is the activities of employees and officials of the Company, within the limits of their powers, to prevent corruption, including the formation of an anti-corruption culture in the Company, identifying and eliminating the causes and conditions conducive to the commission of corruption offenses, as well as identifying, suppressing, disclosing and investigating corruption offenses and elimination of their consequences;

Informant is a person who provided information and information regarding the violations listed in section 1 of the Regulation;

Official is a member of the Board of Directors or the Management Board of the Company;

Employee is a person who is in an employment relationship with the Company and directly performs work under an employment contract, as well as other persons engaged under an agreement through agencies and a civil law agreement;

QMR is quality management representative;

HRD is the Human Resources Department of the Company;

LD is the Legal Division of the Company;

CQM&A is the Center of Quality Management and Accreditation of the Company.

The terms used but not defined in the Regulation are used in the sense in which they are used in the legislation of the Republic of Kazakhstan and internal documents of the Company.

## **4 Responsibility and powers**

4.1 This Regulation is approved by the Chairman of the Board, Rector of the Company.

4.2 Responsibility for the content, structure and design of the approved Regulation lies with the developer of the Regulation. The decision on the final version of the Regulation is made by the QMR.

4.3 The head of the Compliance Service and heads of structural divisions are responsible for bringing the provisions of the Regulation to the attention of the Company's employees. A record of familiarization must be made in the "Familiarization Sheet" (Appendix B).

4.4 Responsibility for the safety, unauthorized copying the quality management system documents located in the department, and leakage of official information lies with the heads of departments.

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## **5 General provisions**

5.1 This Regulation applies to the requirements to the procedure for submitting the information of the following:

- suspicions of committing or planning corruption offenses (bribery, fraud, abuse of power, abuse of power or official authority, official forgery, etc.);
- violation or weakening of the anti-corruption management system;
- non-compliance with the Code of Corporate Ethics and internal policies;
- conflict of interests;
- deliberate concealment of the violations listed above.

5.2 The Company guarantees that employees/officials of the Company who refuse to commit a corruption offense will not be subject to disciplinary liability.

5.3 The Company considers unacceptable disciplinary, discriminatory or any other adverse retaliatory measures, as well as the threat of their application in relation to the Informant who responsibly reported a violation.

5.4 The Informant is guaranteed confidentiality, including the case if the suspicion of a violation is erroneous but with the exception of the case specified in clause 5.6 of the Regulation.

5.5 All the involved parties, including those who are being investigated at the request of the Informant, have the right to confidentiality to prevent unwanted damage to their reputation.

5.6 If the Informant provides knowingly false information of alleged violations, disciplinary measures and/or measures established by the legislation of the Republic of Kazakhstan can be applied to him.

5.7 The Company does not provide the Informant with protection from adverse measures applied to him in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company in connection with grounds (violation of an employment contract, failure to fulfill official duties, etc.) not related to the Informant's disclosure of information of suspicion of committing a violation.

## **6 Procedure for disclosing information and considering appeals**

6.1 The Company has organized the confidential collection and registration of notifications from Informants about any violations listed in clause 5.1 of the Regulation.

6.2 The Informant notifies the Company of suspicion of committing a violation via hotline contacts. The Informant's appeal must include a written statement and detailed information of the possible violation.

Hotline contacts:

Phone: +7 7212 566622.

Email: [compliance@kstu.kz](mailto:compliance@kstu.kz)

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Official website: <https://www.kstu.kz/komissija-po-komplaens-kontrolju-i-obespecheniju-kachestva>.

6.1 The Informant can also send a notice of suspicion of committing any violation in writing directly to the head of a specific structural unit of the Company. In this case, the head of the structural unit of the Company must immediately send the received information to the Compliance Service of the Company.

6.2 The Informant independently chooses the method of providing information: anonymously or by identifying himself. The Informant must take into account that the anonymous provision of information can in some cases complicate or make it impossible to conduct an inspection, including due to the need for the Informant to provide additional assistance and to obtain clarifying information or documentary evidence from the Informant.

6.3 If the Informant refuses to provide information anonymously, the Informant's personal data is used exclusively by employees who are authorized to evaluate the information of possible violations and to conduct an audit. Except for cases requiring the disclosure of such information in accordance with the legislation of the Republic of Kazakhstan, violation of the confidentiality of the Informant's personal data or any other information from which the Informant's identity can be identified by authorized employees of the Company may entail the adoption of disciplinary measures against them.

6.4 The information provided by the Informant is preliminarily assessed by authorized employees of the Company to make a decision on the advisability of further verification.

6.5 If the Informant's notification requires further verification, authorized employees of the Company organize, under conditions of confidentiality, an impartial and objective investigation with respect to all involved parties in accordance with the internal documents of the Company, including the right to request additional information regarding the Informant's statement.

6.6 The information of suspicion of a violation provided by the Informant can be transferred on a confidential basis to the other persons from among the Company's employees involved in conducting a detailed inspection, only on a need-to-know basis.

6.7 Informants or any other persons, with the exception of authorized employees of the Company, should not conduct any independent inspections and investigations.

6.8 If the material information provided by the Informant is confirmed, the Chairman of the Board - Rector of the Company must be informed in detail of the audit results. The Chairman of the Board – Rector of the Company within a reasonable time make a decision on confirmed facts of violations based on the investigation report and recommendations of authorized persons participating in the investigation.

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## **7 Coordination, approval and implementation**

7.1 This Regulation is coordinated with the QMR, Director of the HRD, head of the Legal Division, Chairman of the Trade Union Committee of the teachers and employees of the Company and is documented in the “Coordination sheet” (Appendix A).

7.2 The Regulation is translated into Kazakh and English for the purpose of further posting on the official website of the Company.

7.3 The Regulation with the signature of the developer and approving signatures are submitted by the developer for approval.

7.4 The Regulation is approved by Chairman of the Board, Rector of the Company.

7.5 The date of entry into force of the Regulation is the date of approval of the Regulation.

7.6 The approved Regulation is transferred for safekeeping to the Compliance Service on paper.

## **8 Ensuring accessibility**

Providing the Company's divisions with copies of the Regulation is carried out by posting them on the official website of the Company.

## **9 Safekeeping**

9.1 After posting the electronic version of the Regulation on the official website of the Company, the Company’s employees are familiarized with it and put their signature on the familiarization sheet (Appendix B). Heads of the departments are responsible for familiarizing employees with the Regulation.

9.2 Responsibility for replication, accounting of copies, unauthorized use and safety of the document lies with heads of the departments.

9.3 The full version of the document is stored in electronic form, and the title page and familiarization sheet are stored in printed form.

## **10 Analyzing and updating**

10.1 Checking, analyzing and updating the Regulation are performed:

- during reorganization/renaming of the Company;
- when the strategy, policy and goals of the Company in the field of quality change;
- when non-conformity processes are detected during internal and/or external audits;

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- when there are changes in legislative, regulatory and contractual requirements on anti-corruption issues.

10.2 The Regulation must be reviewed once a year.

10.4 The Regulation updating must be performed by the developer.

10.5 The availability of relevant versions of the Regulation is ensured by electronic versions.

10.6 Ensuring and responsibility for the availability of current versions of documents at workplaces of the departments rests with heads of the departments.

## **11 Amendments to the document**

11.1 Amendments to this Regulation must be made in accordance with DP X-01.

11.2 This Regulation is revised in the event of changing the legislation or as needed.

11.3 If, as a result of changing the legislation of the Republic of Kazakhstan or the Charter of the Company, certain provisions of the Regulation come into conflict with them, it is necessary to be guided by the norms of the legislation of the Republic of Kazakhstan and/or the Charter of the Company before making appropriate amendments and additions to the Regulation.

11.4 Amendments and additions to the Regulation are made by the decision of the Academic Council of the Company. The CQM&A must post an updated version of the Regulation on the official website of the Company within no more than 5 days from the date of approving amendments and/or additions made.