



BAITURSYNULY
UNIVERSITY

ANTI-CORRUPTION POLICY

NON-PROFIT LIMITED COMPANY "AKHMET BAITURSYNULY
KOSTANAY REGIONAL UNIVERSITY"

GENERAL PROVISIONS

The Anti-Corruption Policy of the Non-Profit Limited Company “Akhmet Baitursynuly Kostanay Regional University” (hereinafter — the Policy) has been developed in accordance with the Law of the Republic of Kazakhstan “On Combating Corruption,” the Anti-Corruption Policy Concept of the Republic of Kazakhstan for 2022–2026, the anti-corruption legislation of the Republic of Kazakhstan, as well as the Charter and other internal regulations and documents of the Non-Profit Limited Company “Akhmet Baitursynuly Kostanay Regional University” (hereinafter — the Company/University). It is aimed at creating an effective anti-corruption system within the Company and fostering anti-corruption awareness among employees, faculty members, and students.

This Policy is a foundational document of the Company that defines the main goals and objectives for preventing corruption offences at the University, the principles and organization of corruption prevention, the participants in this process, and their tasks, functions, powers, and responsibilities — including in relations with third parties such as individuals, legal entities, state authorities, and their representatives.

The University adheres to the principle of zero tolerance toward any form of corruption. The Policy establishes the managerial and organizational framework for preventing corruption offences and sets out measures to minimize their consequences.

The requirements defined by this Policy are mandatory for familiarization with and compliance by all employees (faculty members, administrative and managerial staff, and students of the University).

This Policy serves as the basis for developing and adopting internal regulations and other documents of the Company in the field of anti-corruption.

OBJECTIVES, TASKS, AND PRINCIPLES

The main objectives of implementing the Policy in the Company are:

1. Ensuring the protection of the rights and legitimate interests of individuals from negative processes and phenomena associated with corruption offences, and strengthening public trust in the Company’s activities.
2. Forming a unified understanding of the Policy among employees (regardless of position), students, contractors, and other persons, promoting rejection of corruption in all its manifestations and forms, and fostering zero tolerance toward corrupt behaviour.
3. Minimizing the risk of involvement of the Company, its employees, and students in corrupt activities.
4. Identifying conditions and causes that contribute to corruption offences and eliminating their consequences.
5. Generalizing and clarifying the key requirements of the legislation of the Republic of Kazakhstan in the field of anti-corruption.

To achieve these objectives, the following tasks are established for implementing the Policy in the Company:

1. Establishing key principles and rules for the prevention and deterrence of corruption offences at the University.
2. Creating effective mechanisms, procedures, control measures, and other actions aimed at preventing corruption and minimizing the risk of involvement of the University, its employees, and students in corrupt activities.
3. Defining the list of anti-corruption measures, standards, and procedures implemented by the University, as well as the procedure for their execution.
4. Monitoring corruption risk factors and evaluating the effectiveness of measures taken to implement the Policy.

5. Fostering a culture of ethical behaviour and zero tolerance for all forms of corruption, including establishing a unified standard of anti-corruption conduct among University employees and students.
6. Integrating anti-corruption principles into strategic and operational management at all levels of the University's activities.
7. Improving management efficiency and the quality and accessibility of educational services provided by the University.
8. Promoting anti-corruption awareness.
9. Facilitating the realization of the rights of individuals and organizations to access information about corruption facts and corruption risk factors, as well as their free coverage in the media.
10. Applying liability measures to persons involved in committing corruption offences.

KEY DIRECTIONS OF ANTI-CORRUPTION ACTIVITY

The main directions of the Company's anti-corruption activities are:

1. Implementation of a unified Company Policy in the field of anti-corruption.
2. Planning, conducting, and analysing measures aimed at preventing corruption offences.
3. Establishing an effective mechanism for the Company's interaction on anti-corruption matters with state authorities, external organizations, as well as citizens and civil society institutions.
4. Ensuring transparency, fair competition, and objectivity in the provision of services.
5. Ensuring transparency of the management system, access to information about the Company's activities, and adoption of management decisions based on reliable data.
6. Teaching legal disciplines to foster anti-corruption awareness among participants in the educational process.

PREVENTIVE MEASURES FOR COMBATING CORRUPTION

The University's anti-corruption efforts within its authority are expressed through:

- fostering zero tolerance toward corruption in any form;
- conducting internal assessments of corruption risks;
- promoting corporate and social responsibility in preventing corruption offences;
- preventing corruption-related violations;
- communicating the rules and requirements of this Policy to all employees and students of the University.

Areas of the University's activities where corruption risks may arise include:

- gifts and representational expenses;
- engagement of third parties in anti-corruption matters;
- personnel management;
- public procurement activities.

PREVENTION AND SETTLEMENT OF CONFLICTS OF INTEREST

Timely identification of conflicts of interest in the activities of the Company's employees is one of the key elements in preventing corruption offences. The Company pays special attention to preventing risks associated with conflicts of interest and to their proper resolution.

A conflict of interest within the University arises when the personal interest of an employee affects or may affect the objective and impartial performance of their official duties and may cause harm to the rights and legitimate interests of the University, third parties, or the state.

Personal interest of an employee that affects or may affect the proper performance of official duties means the possibility of receiving from third parties, in the course of performing official duties, income in the form of money, valuables, other property, property-related services, or other property rights for themselves or for third parties.

Officials and employees, when performing their duties, must act in the interests of the Company and avoid situations or circumstances in which their personal interests conflict with the interests of the Company. In the event of a conflict of interest or the possibility of its occurrence, officials and employees are obliged to report such information in writing to their immediate supervisor or higher management, as well as to the Anti-Corruption Compliance Service of the Company.

ANTI-CORRUPTION RESTRICTIONS

In order to prevent persons equated to individuals authorized to perform state functions from engaging in actions that may lead to the use of their authority for personal, group, or other non-official interests, such persons assume anti-corruption restrictions regarding:

- the prohibition of joint service with close relatives, spouses, and in-laws;
- the use of official and other non-public information for obtaining or deriving property or non-property benefits and advantages;
- the acceptance of material remuneration, gifts, or services for actions (or inaction) in favour of persons providing such benefits, if such actions fall within the official powers of persons equated to individuals authorized to perform state functions, or if these persons, by virtue of their official position, may facilitate such actions (or inaction).

Family members of persons equated to individuals authorized to perform state functions shall not receive material remuneration, gifts, or services provided in connection with actions (or inaction) of such persons in favour of individuals who provided the remuneration, gifts, or services, if such actions (or inaction) fall within the official powers of the respective person or if that person, by virtue of their official position, may facilitate such actions (or inaction).

Anti-Corruption Review of the Company's Internal Documents and Their Drafts

The analysis of internal regulatory documents and their drafts is carried out with the purpose of identifying any intent on the part of the developer to conceal information, lobby for an insufficiently substantiated proposal, or mislead the public regarding their true intentions.

When conducting an anti-corruption review, particular attention should be paid to the following:

- the alignment of the draft internal regulatory document with other regulatory legal acts or international treaties ratified by the Republic of Kazakhstan, as well as with the Company's internal regulatory documents;
- the identification of entities that may benefit from the adoption of the draft document and the mechanisms by which such benefits may be obtained;

- the identification of parties that may be affected by the draft internal regulatory document and the forms of such impact;
- the financial justification of the draft internal regulatory document;
- other cases where a right granted by an internal regulatory document may result in, or has resulted in, adverse consequences for the Company.

CONFIDENTIAL INFORMATION

In order to maintain a high level of trust and to prevent and suppress instances of corruption, the Company operates a “hotline” on anti-corruption matters.

By contacting the “hotline,” any employee of the Company, contractor, or other person may, in a convenient form, including on a confidential or anonymous basis, report facts of corruption offences, conflicts of interest, violations of the Policy provisions, as well as concerns or doubts regarding the compliance of their own actions or the actions/inactions of other employees, officials, representatives, contractors, or other persons interacting with the Company, with the principles and requirements of the Policy.

The contacts of the “hotline” are published on the official website of the University on the Internet, on information boards, and in other publicly accessible places.

NON-RETALIATION AND SANCTIONS WAIVER

The Company guarantees that none of its employees or representatives will be subject to sanctions (including dismissal, demotion, or deprivation of incentive payments) if they report suspected or known unlawful acts with corruption-related elements or fraud committed by any employees of the Company or other persons interacting with the Company. This includes, but is not limited to, cases where such an employee refused to give or receive a bribe, engage in commercial bribery, or act as an intermediary in bribery.

The Company undertakes to maintain confidentiality in cases where a person who reports suspected or known unlawful acts with corruption-related elements or fraud wishes to keep their identity confidential to avoid any adverse consequences for themselves.

CONSIDERATION OF INFORMATION ON CORRUPTION AND OTHER VIOLATIONS

The Anti-Corruption Compliance Service ensures the review and thorough verification of information regarding actual or alleged corruption offences or other violations of the Policy provisions and other regulatory documents on anti-corruption matters. Such information may be received through any communication channels, including, but not limited to, reports submitted via the “hotline,” information communicated to officials of the Anti-Corruption Compliance Service, and information obtained as a result of internal or external audits of the Company.

The Company implements the necessary procedures, adopts relevant internal regulations, and grants persons conducting investigations all required powers and resources, including independence from other officials and structural units, to carry out such internal investigations.

If the information is confirmed based on the results of internal investigations and appropriate measures are taken to prevent negative consequences for the Company — except for materials submitted to law enforcement authorities — the persons authorized to make decisions based on the investigation results may, upon the proposal of the Anti-Corruption Compliance Service, apply incentive measures to individuals who have openly reported suspected or known unlawful acts involving corruption elements or fraud.

AUDIT AND CONTROL

The Company conducts internal audits of its financial and economic activities, monitors the completeness and accuracy of data reflected in accounting records, and ensures compliance with applicable legislation and internal regulations, including the principles and requirements established by the Policy.

As part of its internal control procedures, the Company performs inspections of key areas of activity, including selective reviews of the legality of payments, their economic justification, and the appropriateness of expenses, including verification against primary accounting documents and compliance with the requirements of the Policy.

PUBLIC DISCLOSURE AND TRAINING

The Company publishes this Policy in open access on its corporate website and publicly declares its zero-tolerance stance toward corruption. It encourages and promotes compliance with the principles and requirements of this Policy by all contractors, employees, staff members, and other persons interacting with the Company.

The Company contributes to enhancing anti-corruption culture by informing employees and providing systematic training to maintain their awareness of the Company's Policy and to equip them with the knowledge and practical skills necessary to implement the Policy effectively.

GIFTS AND REPRESENTATIONAL EXPENSES

Officials who have assumed anti-corruption restrictions regarding the acceptance of gifts shall be guided by the requirements of the legislation of the Republic of Kazakhstan on anti-corruption.

Gifts made on behalf of the Company to other persons and organizations or received by employees in connection with their work at the Company from organizations and other persons, as well as representational expenses — including business hospitality and promotional expenses — must comply with the following criteria:

- be directly related to the lawful objectives of the Company's activities;
- be reasonable, proportionate, and not constitute luxury items;
- not create reputational risks for the Company's employees or other persons if information about such gifts or expenses is disclosed;
- not contradict the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, this Policy, and other internal regulations of the Company;
- not constitute remuneration (open or hidden) for an action (service, lack of action, tolerance, patronage, granting of rights, decision-making on transactions or agreements, lobbying of interests) or an attempt to attract attention to or influence the recipient.

Gifts that are not permitted:

- gifts made on behalf of the Company or its employees in the form of cash or non-cash funds, or their equivalents in any form;
- gifts from subordinate employees to higher management, except for objects of intellectual property;
- gifts from students, master's students, or doctoral students to faculty members of the University, except for objects of intellectual property.

It is prohibited for students, master's students, and doctoral students to organize banquets or receptions for faculty members of the University during examination periods.

It is prohibited to transfer, offer, or promise gifts on behalf of or in the interests of the Company to

a civil servant, official, or person performing managerial functions in the form of money, securities, or other property, or to provide property-related services or property rights in exchange for actions (or inaction) related to the official position of such person and undertaken in their interest.

INTERACTION

The Company ensures safe, confidential, and accessible channels for officials, employees, and representatives to report to senior management or the Anti-Corruption Compliance Service any facts of corrupt practices committed by third parties or colleagues.

To foster an appropriate level of anti-corruption culture, newly hired employees of the Company undergo introductory training on the provisions of this Policy and related documents.

Any employee of the Company or other person, in case of concerns or doubts regarding the legality of their own actions or the actions (or inaction) of other employees, officials, representatives, contractors, or other persons interacting with the Company, may report such concerns or doubts to their immediate supervisor or to the Anti-Corruption Compliance Service.

The Company refrains from paying any expenses for civil servants of the Republic of Kazakhstan, officials of international organizations, or their close relatives (or for their benefit) for the purpose of obtaining commercial advantages or general patronage. This includes expenses for transportation, accommodation, meals, entertainment, advertising, or any other benefits provided at the Company's expense.

Officials and employees of the Company shall refrain from making any offers whose acceptance could place a civil servant in a conflict-of-interest situation.

COOPERATION IN THE FIELD OF ANTI-CORRUPTION

The Company undertakes a public commitment to report the cases of corruption offences that become known to the Company (its employees) to the relevant law enforcement and authorized state bodies.

The Company cooperates in the field of anti-corruption with law enforcement and authorized state bodies for:

- reporting violations that show signs of corruption;
- assisting in investigations of violations that show signs of corruption;
- identifying persons involved in corrupt practices and determining their whereabouts;
- coordinating activities to prevent corruption-related offences;
- identifying property obtained as a result of corrupt practices;
- assisting authorized representatives of supervisory, regulatory, and law enforcement authorities during inspections of the Company's activities related to the prevention and counteraction of corruption;
- assisting authorized representatives of law enforcement authorities in conducting measures to suppress and investigate corruption crimes, including operational investigative activities.

RESPONSIBILITY OF EMPLOYEES AND STUDENTS

All employees of the University, regardless of their position, as well as students, bear personal responsibility for compliance with the anti-corruption legislation of the Republic of Kazakhstan, the principles and requirements of this Policy, and for the actions (or inaction) of their subordinates that violate these principles and requirements.

For committing corruption-related offences, employees of the Company and students shall be held liable in accordance with administrative and criminal legislation, respectively, if their actions contain elements of administrative or criminal offences.

FINAL PROVISIONS

The approved Policy shall be communicated to all employees of the Company, including newly hired staff, and shall be mandatorily applied in the course of carrying out the Company's statutory activities.

The Company conducts systematic monitoring of compliance with the provisions of this Policy and the effectiveness of the implemented anti-corruption measures.

Revision of this Policy, as well as the introduction of amendments and additions, may be carried out in cases of relevant changes and additions to the current legislation of the Republic of Kazakhstan and the Company's internal regulations and documents.