



APPROVED

By the decision of the Board of NJC "Kazakh National University named after Al-Farabi" from "October 29", 2024 № 14



Anti-corruption policy in NJC "Kazakh National University named after Al-Farabi"

Almaty, 2024

1. Purpose of the document and general provisions

1. This policy on combating corruption in NJC "Kazakh National University named after Al-Farabi" (hereinafter - the Policy and the University, respectively) is developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, the requirements of the international standard ISO 37001-2016 " Anti-Corruption Management Systems - Requirements and Guidelines for Application" and internal documents of the University.

2. The policy establishes:

- 1) anti-corruption goals and objectives;
- 2) basic principles of anti-corruption;
- 3) requirements of anti-corruption legislation of the Republic of Kazakhstan and obligations to fulfill them;
- 4) measures to prevent and counteract corruption at the University;
- 5) responsibility for compliance with the Policy.

3. The Policy is mandatory for familiarization and execution by all officials, authorized persons, employees of the University and applies to all structural subdivisions of the University, including branches and other separate subdivisions.

4. The objectives of the Policy are:

- formation at the University of an environment for the realization of educational, educational and scientific research process based on zero tolerance to any manifestations of corruption, free from corruption risks and factors entailing the formation of corruption-prone areas at the University;
- strengthening the business reputation and increasing confidence in the University;
- Implementation of principles, policies, and rules that establish standards of conduct for employees, officers, and authorized persons of the University;
- development and implementation of effective anti-corruption tools at all levels of government;
- minimizing the risk of involvement of the University, its employees, officials and authorized persons of the University in corruption offenses;
- creation of a transparent system of corporate governance and decision-making that provides reasonable assurance that there is no influence of factors related to conflicts of interest of employees and the University.

5. The University's internal control system in the field of anti-corruption is built on the basis of three lines of defense. The first line is represented by the University employees and units - owners of processes in which significant corruption risks have been identified. The second line is represented by compliance control, security, legal support, human resource management, financial controlling and other services.

6. The Internal Audit Service is the third line of defense that, as part of its audits, reviews the effectiveness of existing internal controls to counter corruption in the audited processes of the University.

7. Based on the University's strategic goals defined by the University's Board of Directors in the field of anti-corruption, the Management Board annually sets anti-corruption objectives for the respective year. When defining tasks, a risk-oriented approach is used, which implies prioritization of tasks in processes with increased corruption risk.

8. The Policy shall be posted on the University's official website to enable employees, students, contractors, business partners of the University to familiarize themselves with the basic elements of the University's anti-corruption management system.

9. The following documents are referenced in the Policy:

- 1) Law of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On Combating Corruption" (hereinafter - the Law);
- 2) International Standard ISO 37001:2016 "Anti-corruption management systems - Requirements and guidance for application".

2. Terms and definitions

10. The following terms and definitions are used in the Policy:

- 1) administrative and economic functions - the right to manage and dispose of the property on the balance sheet of the University in accordance with the procedure established by the law of the Republic of Kazakhstan;
- 2) anti-corruption legislation of the Republic of Kazakhstan - the Law of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On Combating Corruption" and other normative legal acts on anti-corruption issues;
- 3) anti-corruption monitoring - the University's activities to collect, analyze and evaluate information related to the effectiveness of the University's anti-corruption measures;
- 4) anti-corruption standard - a system of recommendations established for the University's activities aimed at preventing corruption;
- 5) close relatives - parents (parent), children, adoptive parents (adoptive parents), adopted children, full and half brothers and sisters, grandparents, grandchildren;
- 6) internal analysis of corruption risks - the University's activities to identify and study the causes and conditions contributing to the commission of corruption offenses;
- 7) hotline - a system of proactive whistleblowing was created to provide employees and other stakeholders with the opportunity to confidentially or

anonymously express reasonable suspicions of violations committed or planned by or against University employees;

8) Officer - a member of the Board of Directors and/or Management Board of the University;

9) The Code of Corporate Ethics is an internal document of the University that establishes values, basic principles and standards of behavior aimed at developing corporate culture and strengthening the University's reputation;

10) candidates - persons who are applicants for a position related to the performance of organizational and administrative or administrative and economic functions at the University;

11) conflict of interest - a contradiction between personal interests of officials, authorized persons and other employees of the University and their official (official) powers, in which personal interests of the above persons may lead to non-performance and (or) improper performance of their official (official) duties;

12) corruption - illegal use by University employees of their official (official) powers and related opportunities for the purpose of obtaining or extracting personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as bribing these persons by providing benefits and advantages;

13) corruption offense means a wrongful guilty act (action or inaction) with corruption characteristics, for which the legislation of the Republic of Kazakhstan establishes administrative or criminal liability;

14) corruption risk - the possibility of occurrence of causes and conditions conducive to the commission of corruption offenses;

15) organizational-administrative functions - the right granted in accordance with the procedure established by the law of the Republic of Kazakhstan to issue orders and instructions binding on subordinates, as well as to apply measures of encouragement and disciplinary sanctions against subordinates;

16) anti-corruption - the University's activities within its authority to prevent corruption, including the formation of an anti-corruption culture at the University, identification and elimination of causes and conditions conducive to the commission of corruption offenses, as well as the detection, suppression, disclosure and investigation of corruption offenses and elimination of their consequences;

17) corruption prevention - the University's activities to study, identify, limit and eliminate causes and conditions that contribute to the commission of corruption offenses by developing and implementing a system of preventive measures;

18) employees - individuals who have labor relations with the University;

19) an employee equated to persons authorized to perform state functions (hereinafter - authorized person) - an employee who permanently, temporarily or by special authority performs organizational and administrative or administrative and economic functions at the University, as well as an employee authorized to make decisions on the organization and conduct of procurement, including public procurement, or responsible for the selection and implementation of projects

financed from the state budget and the National Fund of the Republic of Kazakhstan, engaged in the following activities

20) relatives - full and half brothers and sisters, parents and children of the spouse;

21) family members of the official or authorized person - spouse, parents, children, including adult children, and dependent persons permanently residing with him/her.

11. Definitions applied but not disclosed in the Policy are used in the meanings defined in the relevant internal regulatory documents of the University and/or regulatory legal acts of the Republic of Kazakhstan.

3. Objectives of the anti-corruption policy

12. In order to achieve the set objectives, the following tasks are envisaged:

1) Formation of a legal culture in the faculty, officials, authorized persons, other employees of the University and students, providing the principles of honesty and transparency in the performance of official duties and training by:

- creating a uniform understanding among the University employees, students, and contractors of the University of the non-acceptance of corrupt practices in any form or manifestation;
- minimizing the risk of involvement of the University, officials, authorized persons, employees of the University, regardless of their position, terms of employment, status and other relationships with the University in corrupt activities, elimination of facts, situations and processes that lead to corruption;
- prevention of corruption risks when concluding contracts with counterparties, by carrying out checks when concluding contractual relations aimed at reducing the likelihood of corruption;

2) education of students in the spirit of strict law-abidingness;

3) Involvement of faculty, officials, authorized persons, University employees and students in the implementation of anti-corruption measures;

4) establishing the obligation of officials, authorized persons and employees of the University to know and comply with the principles and requirements of anti-corruption legislation of the RK, the Policy, as well as to implement adequate procedures to prevent and prevent corruption;

5) summarizing and explaining the main requirements of anti-corruption legislation of the Republic of Kazakhstan, which may apply to the University, its officials, authorized persons, employees and students;

6) development and implementation of anti-corruption measures aimed at preventing and combating corruption, minimizing and/or eliminating the consequences of corruption offenses;

- 7) continuous monitoring of all key processes reflecting the life and activities of the University with subsequent identification of: corruption factor; signs indicating the formation of corruption-prone areas; possible corruption risks;
- 8) application of modern anti-corruption technologies and mechanisms in the educational, training and research processes of the University;
- 9) effective cooperation with state bodies authorized to carry out anti-corruption activities;
- 10) creating partnerships with public organizations whose purpose is to counter corruption.

4. Principles of anti-corruption policy

13. The main principles of combating corruption of the University are as follows are:

- 1) **priority protection of human and civil rights, freedoms and legitimate interests** - the University respects and ensures full protection of human and civil rights and combats violations of these rights;
- 2) **legality and compliance of the Policy with the legislation of the Republic of Kazakhstan and international norms** - the University strictly complies with the anti-corruption legislation of the Republic of Kazakhstan and other countries in which it operates or plans to operate, international treaties ratified by the Republic of Kazakhstan, and any of its actions or omissions do not contradict the norms of applicable anti-corruption legislation;
- 3) **Zero tolerance to any manifestation of corruption** - The University adheres to the principle of total rejection of corruption in any form or manifestation in the performance of its activities. The principle of zero tolerance to any manifestation of corruption means a strict prohibition for officials, authorized persons, faculty and other employees of the University, as well as persons acting on behalf of the University or in its interests, directly or indirectly, personally or through any intermediary to participate in corrupt practices;
- 4) **The principle of prevention (prophylaxis) of corruption shall be ensured:**
 - constant explanatory work carried out by the Compliance Control Unit and other structural units of the University within the University;
 - introduction of special disciplines for the formation of anti-corruption culture among the participants of the educational process at all specialties of higher and postgraduate education;
 - selection of teaching staff based on the principle of meritocracy, public (collegial) nature of discussion of candidates for career development, nominated for participation in competitions.

- 5) **the principle of personal example** - the University's Board of Directors plays a key role in building a culture of intolerance to corruption and creating a system of corruption prevention and counteraction at the University. Members of the Board of Directors and the Management Board of the University should declare an irreconcilable attitude to any form of corruption and at all levels, demonstrate, observe and implement this principle by personal example;
- 6) **employee involvement** - the University informs its officials, authorized persons, teaching staff and other employees about the provisions of anti-corruption legislation of the Republic of Kazakhstan and welcomes their active participation in the formation and implementation of anti-corruption standards and procedures;
- 7) **due diligence** - the University screens third parties and candidates for employment before making a decision to initiate or continue a business/employment relationship to ensure that they are trustworthy, free of corruption and free of conflicts of interest;
- 8) **inevitability of punishment for committing corruption offenses** - the University declares the inevitability of punishment of the University employees regardless of their position, length of service and other conditions in case they commit corruption offenses in the performance of their official duties;
- 9) **the principle of constant control and regular monitoring** - the University monitors the state of corruption risks, controls compliance with the implemented procedures for preventing and combating corruption and their effectiveness, including by conducting anti-corruption examination of internal university acts defining the procedure, organization and control in the areas of education, upbringing, research activities, as well as by systematically conducting sociological surveys (questionnaires) among students.
- 10) **interaction and coordination** - the University ensures interaction and cooperation in the field of anti-corruption activities with state bodies and other persons engaged in anti-corruption activities, as well as coordination of actions in the process of combating corruption;
- 11) **The principle of publicity is ensured:**
 - immediate response to any signals of possible manifestations of corruption on the part of officials, authorized persons, faculty and/or other employees of the University;
 - immediate response to information on corruption incidents received through the hotline;

- bringing to the attention of the University management information on all reliably identified facts of corruption violations and measures taken to counteract corruption;
- placement of visual materials, posters and stands with anti-corruption content.

5. Requirements of anti-corruption legislation of the Republic of Kazakhstan and obligations to comply with it

14. In accordance with the anti-corruption legislation of the RK, the following (but not limited to the listed) are corruption crimes/offenses for which liability is provided:

- 1) misappropriation or embezzlement of entrusted property committed by an official, if these acts are associated with the use of his official position;
- 2) legalization (laundering) of money and (or) other property obtained by criminal means, committed by an official, if the act is associated with the use of his official position;
- 3) economic smuggling committed by an official, if this act is associated with the use of his official position;
- 4) abuse of power, abuse of power or abuse of authority;
- 5) unlawful participation in business activities;
- 6) receiving a bribe, giving a bribe, mediation in bribery;
- 7) official forgery;
- 8) inactivity in the service;
- 9) Abuse of power, excess or omission of power;
- 10) fraud;
- 11) provision of illegal material remuneration by individuals and legal entities;
- 12) receipt of unlawful material remuneration by an official;
- 13) hiring persons who have previously committed a corruption offense.

15. The University, its officials, authorized persons and employees are obliged to comply with the norms of anti-corruption legislation, as well as the principles and requirements of the Policy, including in any countries where the University operates or plans to operate. In implementing the Policy, the University assumes that its officials, authorized persons and employees directly or indirectly, personally or through third parties are prohibited from engaging in corrupt practices, as well as:

- (1) offering, promising or making a bribe, i.e. providing or promising to provide any financial or other benefit/advantage with the intent to induce a person to perform his/her official duties improperly;
- 2) demanding, agreeing to accept or accepting bribes, i.e. receiving or agreeing to receive any financial or other benefit/advantage for performing their official duties improperly;

- 3) to offer, promise or make payments, except as provided for by applicable law, to give gifts to persons authorized to perform public functions, as well as persons equivalent to them, including foreign officials for speeding up or simplifying established procedures;
- 4) offer, promise or make payments to third parties when there is a suspicion that the payments may be used to expedite or simplify established procedures;
- 5) Offer, promise or grant employment with the University (including on a temporary basis) in exchange for personal gain;
- 6) facilitate the acceptance or accept inflated or fictitious payments from learners, business partners and other third parties;
- 7) give or receive gifts or hospitality that contradict the requirements of the anti-corruption legislation of the Republic of Kazakhstan and internal documents of the University.

16. Officials, authorized persons, employees of the University in their professional activities shall strictly observe the following norms of conduct:

- 1) fulfill the requirements of the legislation of the Republic of Kazakhstan and the Policy;
- 2) be honest and decent in business relations, refrain from any dishonest ways of conducting official duties;
- 3) not to allow the commission of actions that could discredit the University;
- 3) refrain from behavior that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of the University
- 4) to inform his/her immediate superior about the possibility of occurrence or a conflict of interest arising in the employee. When in doubt about the correctness of their actions or any other norms of behavior, officials and employees of the University may contact the head of the Compliance Control Unit of the University;
- 5) not to use for personal purposes the official position, confidential and insider information, tangible and intangible assets of the University;
- 6) to avoid misconduct or actions that may cause suspicion as to their legality and ethics;
- 7) to support and require colleagues to observe a high legal anti-corruption culture;
- 7) refrain from assisting anyone in the course of professional activities and (or) other activities, including those related to income generation;
- 8) not to induce other employees to commit corruption offenses and not to encourage such actions;
- 9) not to perform official duties if there is a conflict of interest;
- 10) to work on the formation of anti-corruption culture in the University team;
- 11) not to occupy positions that are directly subordinate to positions occupied by their close relatives, spouse and (or) in-laws, as well as to have close relatives, spouse and (or) in-laws in their direct subordination. Officials, authorized persons violating the requirements of this subparagraph, if they do not voluntarily eliminate this violation within three months from the date of discovery of the said violation, shall be subject to transfer to positions excluding such subordination, and if such

transfer is impossible, one of these employees shall be subject to dismissal from his/her position or other release from managerial functions

17. Candidates prior to the act of appointment and their spouses shall submit a declaration of assets and liabilities as of the first day of the month of submission of the declaration in the form and in the manner prescribed by the tax legislation of the Republic of Kazakhstan. Officials and authorized persons and their spouses shall submit declarations on income and property in the form, in the manner and within the terms stipulated by the tax legislation of the Republic of Kazakhstan. In case of acquisition of property defined by the tax legislation of the Republic of Kazakhstan during the reporting calendar year, officials and authorized persons and their spouses in the declaration of income and property shall reflect information on the sources of covering expenses for the acquisition of the said property.

The list of information to be published shall be determined by the authorized anti-corruption body.

6. Measures to prevent and counteract corruption at the University

6.1 Building a culture of rejection of corruption.

18. In order to form anti-corruption behavior among officials, authorized persons and employees of the University, general rules and principles of employee conduct shall be established, affecting the ethics of business relations and aimed at the formation of ethical, conscientious behavior of employees. Such general rules and principles of behavior are set forth in the University's Code of Corporate Ethics. Employees know what is right and how they should act when faced with ethical issues. The University encourages employee behavior that is consistent with the principles and standards set forth in the Policy and other University documents.

19. The elements of forming a culture of rejection of corruption are also:

- 1) "Tone from the top: The Board of Directors and the Management Board set the "tone from the top" in order to create unified accepted norms of ethical behavior. The Board of Directors and the Management Board do not expect University employees to behave differently from their own. The Board of Directors, the Management Board to set the "tone from above": demonstrate standards of compliance with ethical and business norms by their own example, bring examples of compliance with ethical and business norms to the University employees, demonstrate their attitude to examples of unethical and dishonest behavior, demonstrate equal treatment of employees regardless of job position, ensure communication and compliance with the Code of Corporate Ethics and Policy. Managers at all levels in their divisions maintain a "tone from the top". Both line and functional managers are responsible for developing a zero-tolerance attitude to corruption in their divisions;
- 2) "Speak-Up: Employees should report any facts of corruption known to them at the earliest opportunity. Employees who have reasonable suspicions of violations of anti-corruption laws or ethical norms set out in the Policy, Code of Conduct, should, first of all, inform their manager, who is in charge of the

- situation and who can effectively respond to it and the Compliance Control Unit;
- 3) involving and informing stakeholders about the functioning of the anti-corruption system; this activity is planned within the framework of setting anti-corruption objectives;
 - 4) The University shall ensure that staff are properly and appropriately informed and trained on anti-corruption issues. Information and training programs should be periodically updated to reflect relevant and important information. Training provided must retain documented information related to training procedures, the content of the training, when and to whom it was provided. University employees shall receive information and training on anti-corruption issues at the time of employment and regularly at least once (1) a year in accordance with their positions, the corruption risks to which they are exposed, and any changes in circumstances. Training and information on existing anti-corruption systems is a mandatory part of training for new employees. The training provided should cover at least the following issues:
 - requirements of anti-corruption legislation, including anti-corruption restrictions, declaration and other issues related to officials, authorized persons and employees of the University;
 - anti-corruption policy, procedures and anti-corruption management system, as well as obligations to follow them;
 - corruption risks and damage to employees and the University that may be caused by bribery and corruption;
 - how employees can help to counter and eliminate corruption and recognize key signs of corruption;
 - contribution of employees to the effectiveness of the anti-corruption management system, including benefits from improved anti-corruption activities and reporting suspicions of corruption;
 - how and to whom workers should report any suspicions;
 - information about the training and resources provided.
 - 5) When interacting with counterparties and business partners, the University informs them of the anti-corruption standards adopted by the University, including, if necessary, by including certain provisions on compliance with anti-corruption standards in contracts. The University strives to establish and maintain business relations with those counterparties and business partners who conduct business relations in a fair and honest manner, take care of their own reputation, demonstrate support for high ethical standards in doing business, and implement their own anti-corruption measures.
 - 6) Implementation of the anti-corruption standard. The University approves the anti-corruption standard, the purpose of which is to establish a system of recommendations for the University personnel aimed at preventing corruption in the performance of employees' job duties and achieving an atmosphere of intolerance to any manifestations of corruption.

6.2 Monitoring and control in the field of anti-corruption.

20. Regular anti-corruption monitoring and control contributes to the prevention and detection of corruption offenses and contains the following measures, but is not limited to them:

- 1) monitoring of anti-corruption legislation of the Republic of Kazakhstan, international acts affecting the University's activities in order to promptly bring its internal documents in line with the changing requirements of anti-corruption legislation;
- 2) analysis of appeals of individuals and legal entities on facts having signs of corruption offenses on the part of officials, authorized persons and employees of the University;
- 3) monitoring of mass media for mentioning the name of the University in connection with corruption manifestations;
- 4) legal examination of key internal documents of the University and their drafts to be approved for the presence in them of provisions contributing to the emergence of corruption factors and development of proposals for their elimination.
- 5) identification and assessment of corruption risks.

6.3 Assessment of corruption risks.

21. The purpose of corruption risk assessment is to identify specific processes, areas of the University's activities in the implementation of which there is the highest probability of committing corruption offenses by University employees for personal gain, to identify conditions conducive to the commission of corruption offenses, corruption schemes. Based on the results of the analysis of corruption risks, measures are developed and controls are defined to reduce significant corruption risks and improve the effectiveness of the anti-corruption system.

22. The key principles of corruption risk assessment are:

- 1) responding to each case of corruption risk, which is potentially assessed as critical and, accordingly, measures are taken to minimize potential damage;
- 2) identification of the most risky areas and business processes in the University's activities, with the greatest attention and resources being given to processes with high corruption risks;
- 3) Regularity: conducting corruption risk analysis on a periodic basis to confirm the effectiveness of existing controls as part of the continuous improvement program.

23. Corruption risk assessment shall be carried out at least once a year and in case of significant changes in the factors affecting the effectiveness of the University's anti-corruption system. The assessment of corruption risks shall be carried out in case of creation or significant changes in the University's business processes, including the development, introduction of new areas, services in the educational process, economic activities of the University.

24. Corruption risk assessment is carried out by all University units - owners of business processes - without exception. The person responsible for the identification and assessment of corruption risks, as well as for the development of measures to reduce them is the senior manager in charge of the analyzed business process.

25. The procedure for conducting corruption risk assessment is described in the University's internal documents. The conduct of corruption risk assessment shall be compulsorily documented and saved.

6.4 Personnel management measures.

26. The University observes the principles of objectivity, honesty in making personnel decisions. In order to eliminate corruption risks in the recruitment, evaluation, promotion and dismissal of personnel, the University:

- 1) develop and approve, in accordance with the established procedure, transparent procedures for selection and recruitment of personnel, occupation of vacant positions, competitive selection and approve appropriate qualification requirements for the position;
- 2) conducts background checks on employment candidates before making a decision to begin or continue an employment relationship to ensure that they are trustworthy and free of conflicts of interest;
- 3) Evaluates personnel performance and pays remuneration based on the performance of its key performance indicators and professional achievements;
- 4) make a decision on promotion to a higher position based on the business qualities and qualifications of the employee;
- 5) carries out the procedure of termination of labor relations with the employee on the grounds stipulated by the legislation of the Republic of Kazakhstan and internal documents of the University.

27. Officials, authorized persons when hired or continuing employment relations with the University accept anti-corruption restrictions in accordance with the form of consent to accept anti-corruption restrictions according to Annex 1 to the Policy, which are recorded in writing by the Human Resources Management Unit. Failure to accept anti-corruption restrictions by officials, authorized persons of the University shall result in refusal to accept a position or dismissal from the position, their non-compliance in cases where there are no signs of a criminal offense and administrative offense is grounds for termination of powers.

28. All applicants for positions are required to notify, in writing, any close relatives, spouse and/or in-laws employed by the University.

29. Candidates shall also inform about close relatives, spouse and (or) in-laws, being founders (co-founders), holding managerial positions in legal entities; this information shall be analyzed within the framework of in-depth verification procedures and shall be used, inter alia, in the analysis of counterparty risks.

30. Upon employment at the University, candidates shall submit the declaration provided for in paragraph 17 of the Policy. Failure of candidates to submit declaration of assets and liabilities or submission of incomplete, inaccurate information in such declarations, if the offense does not contain signs of a criminal offense shall be grounds for refusal to issue an act of their appointment.

31. The University conducts due diligence of applicants for vacant positions before they are hired. Appropriate due diligence procedures shall be developed depending on the expected functions of these persons and related corruption risks. The

procedure for conducting due diligence is determined by the University's internal documents.

32. The results of the conducted checks should be used when making decisions on appointment of applicants to vacant positions. If there are negative results of the verification, the decision to select an applicant shall be reasoned and documented in order to ensure transparency of the decision.

33. When developing the organizational structure of the University, an analysis of the distribution of powers and functional load is carried out in order to exclude conflicts of interest. The results of such analysis shall be communicated to the Board of the University when approving the organizational structure.

34. The terms and conditions of employment contracts of employees shall stipulate obligations and responsibility for compliance of the employee with anti-corruption legislation, as well as the possibility of disciplinary action for violation of such obligations. The terms of employment contracts of managers shall provide for liability for corruption and other offenses committed by their subordinates. All hired employees shall be familiarized with the requirements of the Policy within a reasonable period of time and sign an undertaking to comply with it in accordance with Annex 2 to the Policy.

35. The legislation of the Republic of Kazakhstan provides a number of special requirements for officials and authorized persons. The list of such persons is approved annually by the Rector of the University on the proposal of the Human Resources Management Unit and is updated in case of changes in the organizational structure, functional responsibilities and other personnel changes. Persons included in the above list are responsible for compliance with the requirements of the legislation.

36. The unit for human resources management is responsible for keeping the list of officials and authorized persons up to date. In case of changes in the requirements and restrictions stipulated by the legislation, and at least once (1) a year in the absence of changes, the human resources management unit shall inform the specified employees of the University about the requirements and take measures to ensure compliance with them.

6.5 Managing conflicts of interest

37. Conflict of interest management is an important component of the anti-corruption system. The University pays great attention to preventing the realization of risks related to conflict of interest and their settlement. In order to regulate the processes related to the emergence of a conflict of interest, the University approves relevant internal documents on the settlement and prevention of conflicts of interest.

38. Officials, authorized persons and employees of the University in the performance of their official (job) duties are obliged to be guided by the interests of the University and avoid situations or circumstances in which their personal interests (direct or indirect) will affect the objectivity and integrity of the performance of their official (job) duties and contradict the interests of the University. Personal interest means the possibility that an employee may receive income from third parties in the form

of money, valuables, other property or services of a proprietary nature, other property rights or benefits for himself or for third parties for non-performance or dishonest performance of his official duties.

39. A conflict of interest may arise when relatives work together and/or employees and their relatives participate in authorized capitals and management bodies of third parties, carry out entrepreneurial activities or employees combine other paid activities outside the University.

40. In order to avoid, prevent and resolve conflicts of interest, employees of the University shall:

- 1) disclose information about the conflict of interest or the likelihood of its occurrence as soon as they become aware of it, in accordance with the University's established procedures and internal regulatory documents;
- 2) take measures to prevent any possibility of a conflict of interest;
- 3) minimize the risk of conflicts of interest in the performance of their functional duties.

41. In case of a conflict of interest (or the possibility of its occurrence), officials and employees of the University are obliged to bring this information in writing to the attention of their immediate supervisor and the Compliance Control Unit. The University management, upon requests of officials and employees or upon receipt of information from other sources, is obliged to take appropriate response measures in a timely manner in accordance with the University's internal documents on prevention and settlement of conflicts of interest

42. All University employees receive annual training on conflict of interest issues.

43. Information on the existence of a conflict of interest and measures taken to control it shall be documented and stored in accordance with the documents regulating the management of conflict of interest.

6.6 Official inspections and investigations on complaints of corruption offenses

44. Within the framework of received applications of individuals and legal entities and other reports on corruption offenses, the University shall conduct an audit or official investigation with the participation of the relevant structural units authorized to do so, in the manner prescribed by the internal documents of the University. If the results of the audit or official investigation reveal the fact of corruption, the University shall ensure that measures are taken to bring to justice the perpetrators of the corruption offense, including termination of the employment contract and transfer of materials to the relevant authorized state bodies, as well as take measures to prevent corruption offenses in the future by improving the monitoring of corruption risks and control procedures.

7. Responsibility

45. Officials, authorized persons and employees of all structural units of the University, regardless of their position, are responsible for compliance with the

principles and requirements of the Policy, as well as for the actions (inaction) of their subordinates who violate these principles, requirements, anti-corruption standards and restrictions.

46. Measures of liability for corruption offenses shall include measures of criminal, administrative and disciplinary liability in accordance with the legislation of the Republic of Kazakhstan.

8. Final provisions

47. Amendments, additions to the Policy shall be made as necessary.

48. The content of the Policy shall be communicated to the University employees in the manner determined by the University's regulatory documents and procedures

49. Control over familiarization with the provisions of the Policy shall be entrusted to the heads of the University's structural units.

**to the Anti-Corruption Policy in NJC “Kazakh
National University named after Al-Farabi”,
approved by the decision of the Board
NJC “Kazakh National University named after Al-Farabi”
dated October 29, 2024 № 14**

Statement on the adoption 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 Policy on Combating Corruption in NJC "Kazakh National University named after Al-Farabi" in order to prevent the commission of actions that may lead to the use of their powers in personal, group and other non-business interests, I accept anti-corruption restrictions on:

- 1) engaging in activities incompatible with the performance of its functions;
- 2) inadmissibility of joint service (work) of close relatives¹, spouses and relatives², including holding a position directly subordinate to the positions held by my close relatives, spouse and (or) relatives, as well as having close relatives, spouse and (or) relatives in direct subordination;
- 3) performance of official duties, if there is a conflict of interest;
- 4) use of official and other information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 5) acceptance by me and members of my family³ of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such

¹ close relatives are defined as parents (parent), children, adoptive parents (adoptive parents), adopted children, full and half brothers and sisters, grandparents and grandchildren,
under relatives - full and half brothers and sisters, parents and children of the spouse

² under relatives - full and half brothers and sisters, parents and children of the spouse

³ **Family members** are defined as his/her spouse, parents, children, including adult children, and dependent persons permanently living with him/her

actions are within my official powers or I can facilitate such actions (inaction) by virtue of my official position;

6) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, keeping cash and valuables in foreign banks located outside the Republic of Kazakhstan;

7) participation in gambling games and (or) betting in gambling establishments that fall under the definition provided by the Law of the Republic of Kazakhstan "On Gambling Business", as well as participation in gambling games and (or) betting in unauthorized places or in gambling games and (or) betting conducted through the use of telecommunication networks, including the Internet.

Date: " ____ " _____ 202__ year.

_____ (подпись)

**to the Anti-Corruption Policy in NJC "Kazakh
National University named after Al-Farabi",
approved by the decision of the Board
NJC "Kazakh National University named after Al-Farabi"
dated October 29, 2024 № 14**

By signing this form, the employee confirms that he/she undertakes to faithfully follow and strictly comply with the anti-corruption laws of the Republic of Kazakhstan and the Anti-Corruption Policy in NJC "Al-Farabi Kazakh National University".

The completed and signed form confirming the employee's familiarization with the Anti-Corruption Policy shall be kept in the employee's personal file from the moment of performance of labor and/or job duties at the University.

Confirmation of employee's familiarization with the Anti-Corruption Policy

I, _____, (last
name, first name, patronymic)

(specify position)

Please check the appropriate boxes

☐ I confirm that I have studied the Anti-Corruption Policy of NJC "Al-Farabi Kazakh National University";

☐ I undertake to strictly comply with the requirements established by the anti-corruption legislation of the Republic of Kazakhstan, the Policy on Combating Corruption at NJC "Kazakh National University named after Al-Farabi";

☐ I have been notified that in case I violate the anti-corruption legislation of the Republic of Kazakhstan, the Policy on Combating Corruption in NJC "Kazakh National University named after Al-Farabi", I may be held liable, including dismissal from my position, in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

Date: "___" _____ 202__ year.

Caption: _____