 <p>SATBAYEV UNIVERSITY</p>	<p align="center">NON-PROFIT JOINT-STOCK COMPANY “KAZAKH NATIONAL RESEARCH TECHNICAL UNIVERSITY named after K.I. SATBAYEV”</p>	
<p align="center">QMS document 1 level</p>	<p align="center">Edition No. 2 from 14 november 2023</p>	<p align="center">Pol. 029-02-04.3.01 – 2023</p>



by the Resolution of the Board of Directors
of the NJSC "Kazakh National Research
Technical University named after K.I. Satbayev"
dated November 14, 2023 No. 8

ANTI-CORRUPTION POLICY

Pol. 029-02-04.3.01 – 2023

Almaty, 2023

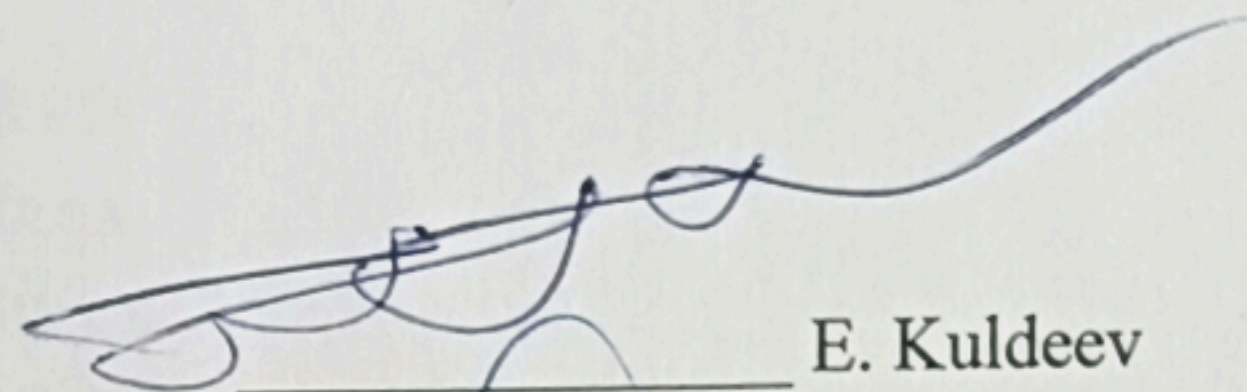
PREFACE

1 DEVELOPED by the Anti-Corruption Compliance Service of NJSC "Kazakh National Research Technical University named after K. I. Satpayev"

2 AGREED

Member of the Board – Vice-Rector
for Science and Corporate Development

"13" 11 2023



E. Kuldeev

Member of the Board – Vice-Rector
for Administrative, Social and Educational Work

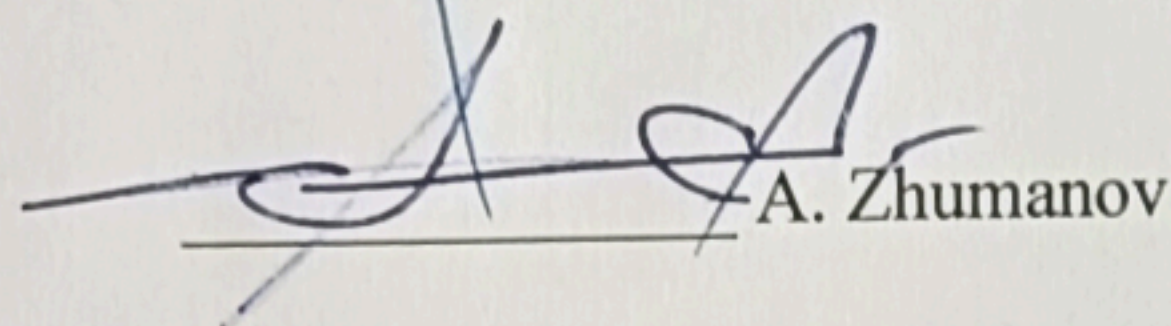
"10" 11 2023



S. Shalabaev

Head of Anti-Corruption
Compliance Services

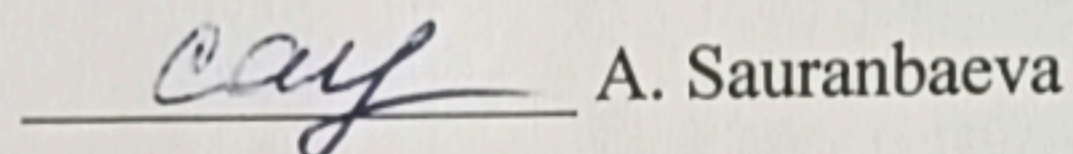
"07" 11 2023



A. Zhumanov

Department Head,
Assessments and Quality

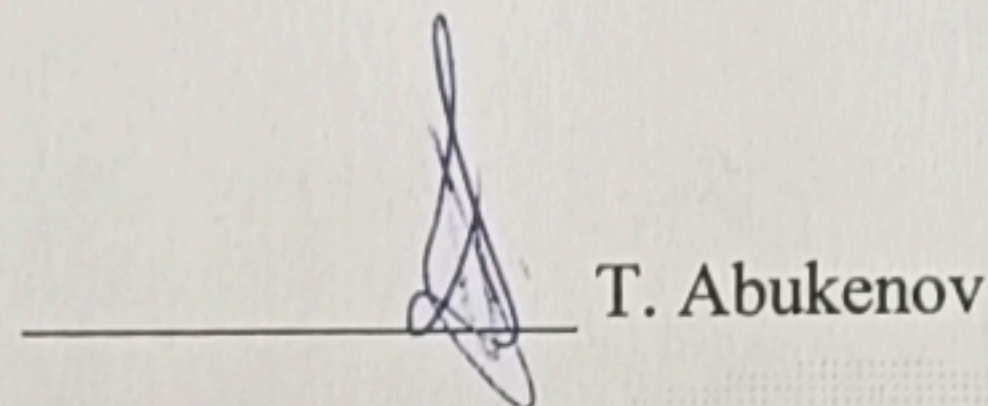
"10" 11 2023



A. Sauranbaeva

Acting Head of the Department of Legal
Support and Public Procurement

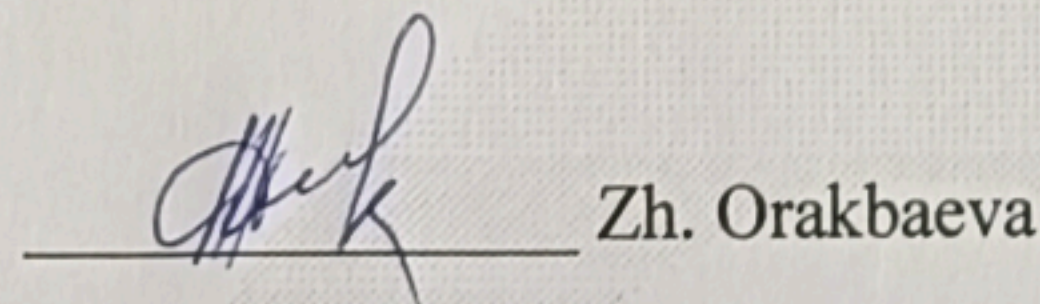
"09" 11 2023



T. Abukenov

Head of the Department of Documentation
Support and Development of the State Language

"08" 11 2023



Zh. Orakbaeva

3 APPROVED by the decision of the Board of Directors dated

"14" 11 2023, minutes No. 8

4 INTRODUCED to replace Edition No. 1 of January 24, 2018.

CONTENT

1 General Provisions	4
2 Basic terms and definitions	4
3 Target and tasks Anti-corruption politicians	5
4 Basic principles Anti-corruption politicians	6
5 Region applications Anti-corruption politics	6
6 Adoption And implementation Anti-corruption politics	6
7 Responsibilities of the governing body and executive body, as well as University employees related to preventing and combating corruption	8
8 Responsibility	9
9 Analysis applications And revision	9
Appendix	10
Change registration sheet for	12

1 GENERAL PROVISIONS

1.1 This Anti-Corruption Policy is a strategic document of the Non-Profit Joint Stock Company "Kazakh National Research Technical University named after K. I. Satbayev" (hereinafter referred to as the University), defining the key principles, requirements and measures aimed at preventing and combating corruption, reducing the negative impact of corruption, and eliminating the causes and conditions conducive to its occurrence.

1.2 The Anti-Corruption Policy was developed in accordance with the Constitution of the Republic of Kazakhstan, the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption", the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022–2026, the Charter, the Management of SMPC SU, and other internal documents of the University.

1.3 The present document defines:

- targets and tasks;
- basic principles;
- scope of application;
- adoption and implementation;
- responsibilities of the governing body, executive body and employees of the University related to preventing and combating corruption;
- responsibility for non-performance (improper performance);
- analysis of the application and revision of this Anti-Corruption Policy.

2 BASIC TERMS AND DEFINITIONS

This Anti-Corruption Policy uses the most commonly used terms and definitions:

1. Anti-corruption policy — legal, administrative and organizational measures aimed at reducing corruption risks;

2. Official — a person who permanently, temporarily or by special authority exercises the functions of a representative of the government or performs organizational, administrative or administrative functions in government bodies, entities of the quasi-public sector, a member of the Board of Directors, or a member of the University Board;

3. Employee — an individual who has an employment relationship with the University.

4. Commercial bribery — the illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as the illegal provision of property-related services to him for the use of his official position, as well as for general patronage or connivance in the service in the interests of the person carrying out the bribery.

5. Bribe — money, securities, other property, rights to property or benefits of a property nature received 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.

6. Mediation in bribery/commercial bribery — direct transfer of a bribe/subject of commercial bribery (illegal remuneration) on behalf of the bribe giver/person transferring the subject of commercial bribery, or the bribe recipient/person receiving the subject of commercial bribery, or other assistance to the bribe giver and/or bribe recipient/persons participating in the achievement or implementation of an agreement between them on receiving and giving a bribe/commercial bribery;

7. Corruption is the illegal use by University officials of their 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 by providing benefits and advantages;

8. Anti-corruption — the activities of the University within its powers to prevent corruption, including the formation of an anti-corruption culture at the University, identifying and eliminating the causes and conditions conducive to the commission of corruption offenses and eliminating their consequences;

9. Prevention of corruption — activities of anti-corruption entities to study, identify, limit and eliminate the causes and conditions conducive to the commission of corruption offenses through the development and implementation of a system of preventive measures.

10. Anti-corruption restrictions — restrictions established by the Law of the Republic of Kazakhstan “On Combating Corruption” and aimed at preventing corruption offences.

3 PURPOSE AND TASKS ANTI-CORRUPTION POLITICIANS

3.1 The Anti-Corruption Policy reflects the University’s commitment to high ethical standards, conducting open and honest work in compliance with accepted standards of corporate culture, following best practices of corporate management, and maintaining its business reputation at a proper level, by introducing a complex of interconnected principles, procedures and measures aimed at countering corruption.

3.2 The goal of the Anti-Corruption Policy is to develop and implement a unified approach at the University to fulfill the requirements of the Law of the Republic of Kazakhstan, as well as the formation of an effective anti-corruption system and zero tolerance for corruption among students, teaching staff and employees of the University.

3.3 Achieving the goal is ensured by solving the following tasks:

– identification of key areas for implementing the requirements of the Law of the Republic of Kazakhstan “On Combating Corruption”;

– identifying the risks of possible corruption at the University;

– taking legal, administrative and organizational measures aimed at reducing corruption risks;

– development and implementation of comprehensive and consistent systemic measures to prevent and eliminate (minimize) the causes and conditions that give rise to corruption, and to minimize and/or eliminate the consequences of corruption offenses;

- formation of an anti-corruption consciousness among University employees, characterized by intolerance to any forms and manifestations of corruption at all levels;
- introduction of anti-corruption education by including the elective subject “Fundamentals of Anti-Corruption Culture” in educational programs;
- ensuring responsibility for corruption offenses.

4 BASIC PRINCIPLES OF ANTI-CORRUPTION POLICY

The Anti-Corruption Policy is based on the principles of:

- equality of all before the law and justice;
- openness and transparency;
- comprehensive use of anti-corruption measures;
- priority of corruption prevention;
- efficiency and effectiveness of anti-corruption measures and procedures;
- rejection of corruption in all its manifestations;
- protection of persons providing assistance in combating corruption;
- inevitability of punishment for corruption for University employees, regardless of position, length of service and other conditions;
- high-quality digital transformation;
- cooperation in the field of anti-corruption activities with government agencies.

5 SCOPE OF THE ANTI-CORRUPTION POLICY

5.1 All employees, management bodies and executive bodies of the University must be guided by this Anti-Corruption Policy and strictly comply with its principles and requirements.

5.2 The responsibilities of employees, the governing body and the executive body of the University aimed at preventing and combating corruption are defined in Chapter 7 and are mandatory.

5.3 The Anti-Corruption Policy also applies to students and persons involved in joint activities with the University.

6 ADOPTION AND IMPLEMENTATION OF THE ANTI-CORRUPTION POLICY

6.1 The Board of Directors of the University:

- reviews and approves the University’s internal document — the Anti-Corruption Policy;
- determines the structural units responsible for the implementation of the Anti-Corruption Policy, endowing them with the appropriate powers.

6.2 The Head of the Anti-Corruption Compliance Service, responsible for the implementation of the Anti-Corruption Policy, develops and implements a list of activities, including:

- development and approval of regulatory documents for the implementation of the Anti-Corruption Policy;
- monitoring the results of the implementation and application of the Anti-Corruption Policy;
- carrying out control measures aimed at identifying corruption and other offenses;
- development, approval and implementation of a program of measures aimed at preventing and combating corruption and managing corruption risks;
- formation of an anti-corruption culture;
- training and informing employees (including conducting training events on the issues of preventing and combating corruption, individual counseling of employees on compliance with anti-corruption standards and procedures, familiarizing employees when hiring with regulatory documents regulating issues of preventing and combating corruption);
- interaction with government authorities, law enforcement agencies and the media in the field of combating and preventing corruption;
- coordination, control and evaluation of the activities of structural units in the field of implementation of the Anti-Corruption Policy, with the submission of relevant reporting materials to the management of the University;
- updating documents in connection with changes in the anti-corruption legislation of the Republic of Kazakhstan and other cases specified in clause 9.3;
- posting information about activities to implement this Anti-Corruption Policy on the official website of the University;
- annual submission to the Board of Directors of a report on compliance with this Anti-Corruption Policy.

6.3 In the process of implementing the Anti-Corruption Policy, the University:

- is guided by the principles of honesty and objectivity in forming personnel (including managerial) staff: employees are appointed or transferred to higher positions only based on business qualities; a ban is imposed on the employment of persons related by close kinship or property if the implementation of official responsibilities is associated with direct subordination or control of one over another;
- provides protection to persons who submitted messages about possible facts of corruption from any forms of pressure (including dismissal, persecution, and any forms of discrimination), stimulates employees for providing confirmed information about corruption and other offenses at the University;
- checks information about possible facts of corruption, and if confirmed, a decision is made to transfer relevant materials to law enforcement agencies of the Republic of Kazakhstan.

7 RESPONSIBILITIES OF THE GOVERNING BODY AND EXECUTIVE BODY, AS WELL AS EMPLOYEES OF THE UNIVERSITY RELATED TO PREVENTING AND COMBATING CORRUPTION

7.1 The governing body and executive body, as well as employees of the University, when performing their official duties, must:

7.1.1 read the Policy and sign the Familiarization Sheet. By signing the Familiarization Sheet, the employee/official accepts the obligation to comply with the Policy. For newly hired employees, the obligation to comply with the Policy is formalized in the employment contract;

7.1.2 follow the Anti-Corruption Instructions and the University Anti-Corruption Standard;

7.1.3 take into account compliance with the Policy when assessing the business qualities of an employee, including when appointing the employee to a higher position and resolving other personnel issues;

7.1.4 strictly comply with the restrictions provided for in the Policy and requirements, including those related to giving and receiving gifts; carrying out entertainment expenses; charitable and sponsorship activities; interaction with government representatives and public organizations; interaction with contractors, intermediaries and third parties; avoiding conflicts of interest; reporting;

7.1.5 strictly observe the categorical prohibition of the following actions:

- participate in corrupt practices, including not offering, promising or giving bribes;
- ask for and/or receive bribes (commercial bribery);
- participate in commercial bribery of counterparties or counterparties' employees/officials of the University;
- make payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of cash or cash equivalents, valuables, services or other benefits of a property and non-property nature, to any persons and from any persons or organizations, including commercial and non-profit organizations, authorities and local governments, in order to obtain benefits for yourself, for the University or for third parties;

7.1.6 University officials, in the performance of their official duties, must strictly observe the categorical prohibition on requesting and receiving bribes from the Company's counterparties and other third parties;

7.1.7 comply with anti-corruption requirements and restrictions established by other internal documents of the University (to the extent not contrary to the Anti-Corruption Policy).

8 RESPONSIBILITY BEHIND NON-PERFORMANCE (INAPPROPRIATE PERFORMANCE) THIS ANTI-CORRUPTION POLITICIANS

8.1 Responsibility for compliance with the requirements of this Anti-Corruption Policy lies with each employee/official of the University, regardless of their position.

8.2 The commission of corruption offenses and/or fraudulent actions by a University employee is recognized as a gross violation of labor duties, for which the University has the right to bring the University employee to disciplinary liability, including in the form of termination of the employment contract in the manner established by the current legislation of the Republic of Kazakhstan.

8.3 The governing body and the executive body bear disciplinary liability in accordance with the laws of the Republic of Kazakhstan for failure to fulfill or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees.

8.4 If there are sufficient grounds, the materials of the internal investigation on the above facts are transferred to law enforcement agencies with a statement to bring the perpetrators to administrative or criminal liability.

8.5 In the event of harm or damage to the University, the University reserves the right to file a civil claim in court against the person who committed corruption offenses and/or fraudulent acts.

9 ANALYSIS OF THE APPLICATION AND REVISION OF THE ANTI-CORRUPTION POLICY

9.1 The University regularly monitors the progress and effectiveness of the implementation of the Anti-Corruption Policy, both independently and with the involvement of other persons within its competence.

9.2 The University provides conditions in which employees and other persons can freely point out shortcomings in the implementation of the Anti-Corruption Policy, as well as make proposals for its improvement.

9.3 Changes to the University's Anti-Corruption Policy are made in the following cases:

- the need to bring the provisions of the Anti-Corruption Policy into compliance with changes and additions to the anti-corruption legislation of the Republic of Kazakhstan;
- changes in the structure of the University, which have a direct impact on the implementation of this Anti-Corruption Policy;
- improving measures to implement the Anti-Corruption Policy.

Appendix 1

Agreement on the adoption of anti-corruption restrictions

I, _____,
(Full Name)

(specify position)

in order to comply with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, the Anti-Corruption Policy at NJSC "KazNRTU named after K. I. Satbayev", and preventing the commission of actions that could lead to the use of my powers in personal, group and other non-official interests, I accept anti-corruption restrictions on:

1. carrying out activities incompatible with the performance of their functions;
2. the inadmissibility of officials holding positions located in the same unit with their close relatives (parents (parent), children, adoptive parents, adopted children, full-blood and half-siblings, grandparents, grandchildren), spouses and relatives (brothers, sisters, parents and children of the spouse), or — if departments are different — where the position is functionally related (by business processes) with positions held by their close relatives;
3. use of information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
4. accepting gifts in connection with the performance of official powers in accordance with the legislation of the Republic of Kazakhstan.

The completed and signed confirmation form from the date of performance of labor and/or official duties at the University is kept in the personal file.

signature, full name position

Appendix 2

Confirmation

{Please check the appropriate boxes}

I confirm that I have studied the Anti-Corruption Policy of NJSC “KazNRTU named after K. I. Satbayev”;

I undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy at NJSC “KazNRTU named after K. I. Satbayev”;

I am notified that in the event of my violation of the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy at NJSC “KazNRTU named after K. I. Satbayev”, I can be held accountable, including being released from my position, in the manner established by the legislation of the Republic of Kazakhstan.

The completed and signed confirmation form from the moment of performance of labor and/or official duties at the University is kept in the personal file.

_____ Signature, full name, position
position

Change registration sheet for _____
document designation

Serial number changes	Section, paragraph document	Type of change (replace, cancel, add)	Number and date notices	Change made	
				date	Last name and initials, signature, position