



NJSC “KARAGANDA INDUSTRIAL UNIVERSITY”

CONSIDERED
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APPROVE:
Chairman of the Board-Rector
B. Abdrasilov

ANTI-CORRUPTION POLICY

Temirtau, 2022 y.

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1 BASIC PROVISIONS

This Policy is a basic document defining the main goals, objectives, principles, and directions of the university's anti-corruption activities. The Policy was developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, internal documents of the NJSC "Karaganda Industrial University" (hereinafter – the Company, KarIU) and other applicable documents.

The Policy establishes: goals and objectives in the field of anti-corruption; basic principles of anti-corruption; a set of measures to prevent and combat corruption in the Company; applicable requirements of the anti-corruption legislation of the Republic of Kazakhstan and obligations to comply with it; responsibility for compliance with this Policy.

2. SCOPE OF APPLICATION AND REGULATORY REFERENCES

The Company recognizes that the anti-corruption system is dynamic and changes depending on the context and environment of the company's functioning, the needs and expectations of stakeholders. The Company must ensure that the anti-corruption goals are consistent with the overall strategic development goals.

The scope of this Policy includes situations related to any forms of corrupt behavior defined by this Policy, including the receipt and offer of bribes and other benefits by employees of the Company directly or through a third party for the provision of certain benefits that would not have been presented without a bribe. Factors affecting the boundaries and applicability of the anti-corruption system can be: internal and external environment, expectations of stakeholders, results of corruption risk assessment, and so on.

This Policy is mandatory for familiarization and execution by all teaching staff and employees of the Company and applies to all structural divisions of the Company.

The policy is not intended to replace the substantive legal norms established by the applicable anti-corruption legislation. This Policy sets out minimum mandatory standards in the field of anti-corruption and related issues, and it is designed to ensure consistent work on the management of risks associated with bribery and corruption. In addition, the teaching staff and employees of the Company must comply with anti-corruption legislation and regulatory legal acts that may provide additional or other requirements.

The main provisions of this Policy are posted on the official Internet resource (website) of the KarIU to enable consumers of services, corporate partners, teaching staff and employees of the Company to familiarize themselves with the basic elements of the anti-corruption management system.

This Policy uses references to the following documents:

1) The Law of the Republic of Kazakhstan dated 18.11.2015 No. 410-V "On combating corruption".

2) Decree of the President of the Republic of Kazakhstan dated February 2, 2022 No. 802 "On approval of the Concept of Anti-corruption Policy of the Republic of Kazakhstan for 2022-2026 and amendments to some decrees of the President of the Republic of Kazakhstan".

3) International standard ISO 37001:2016 "Anti-bribery management system".

4) The fourth round of monitoring of the Istanbul Anti-Corruption Action Plan (Chapter 4. Prevention and Prosecution of Corruption in a Particular sector - Higher Education, Recommendation No. 29).

5) On approval of the Standard Rules for Conducting Internal Analysis of Corruption Risks. Order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 No. 12.

6) On approval of the Rules for Anti-Corruption Monitoring (Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated January 28, 2020 No. 22.

7) KarIU Anti-Corruption Standard;

8) Code of Academic Integrity of Faculty and staff of KarIU;

9) Academic policy and other regulatory legal acts regulating educational and scientific activities in the Society.

When applying the documents specified in this paragraph of the Policy or other references of this Policy, the current versions of the documents approved in accordance with the established procedure are used.

GLOSSARY

The following terms are used in this Policy:

1) **corruption risk analysis** - identification and study of the causes and conditions that contribute to the commission of corruption offenses;

2) **anti-corruption legislation** - the Law "On Combating Corruption" and other regulatory legal acts on anti-corruption issues of the Republic of Kazakhstan;

3) **anti-corruption monitoring** - the activity of collecting, processing, summarizing, analyzing and evaluating information related to the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption by society;

4) **a bribe** the offer, promise, provision, acceptance or extortion of an undue advantage in any form (both financial and non-financial), directly or through intermediaries, regardless of location, in violation of applicable law as an incentive or reward for a person acting or refraining from acting in relation to the results of activities for which he is responsible responsibility;

5) **senior management** - a person or a group of employees who exercise leadership and management at the highest level and have a significant impact on

the functioning of the anti-corruption system; in the Company, the members of the Management Board belong to the Top Management;

6) **conflict of interest** - a situation in which business, financial, family, political or personal interests could influence the decisions of persons in the performance of their duties in relation to Society;

7) **corruption** - illegal use by the teaching staff and employees 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 by providing benefits and advantages;

8) **anti-corruption** - activities for the prevention (prevention) of corruption, including the formation of an anti-corruption culture, the identification and elimination of causes and conditions conducive to the commission of corruption offenses, as well as the identification, suppression, disclosure and investigation of corruption offenses and elimination of their consequences;

9) **teaching staff and employees** - individuals who are in an employment relationship or have concluded a civil contract with the Company;

10) **anti-corruption system** - a set of measures taken by the Company to prevent and combat corruption, reduce corruption risks in the Company's processes, and form an anti-corruption culture.

Other definitions used in this Policy, not specified in this paragraph, are used in the values defined in the relevant internal regulatory documents of the Company and/or legal acts of the Republic of Kazakhstan.

3 RESPONSIBILITIES AND FUNCTIONS OF THE MANAGEMENT BODIES, STRUCTURAL DIVISIONS AND EMPLOYEES OF THE KARIU WITHIN THE FRAMEWORK OF THE ANTI-CORRUPTION SYSTEM

The Board of Directors of the Company within the framework of leadership in the field of anti-corruption:

1) monitors the implementation of the anti-corruption system by the Company's Management Board and its effectiveness;

2) monitors and monitors the effectiveness of the functioning of the anti-corruption system in the Company, receiving information from the Management Board and/or compliance officer on the construction and functioning of the anti-corruption management system of the Company and on the measures taken in the field of combating corruption.

The Management Board of the Company is responsible for:

1) promotion of a culture of rejection and anti-corruption;

2) effective implementation of anti-corruption tools;

3) ensuring the integration of the requirements of the anti-corruption management system into the Company's business processes;

4) allocation and control of the rational use of sufficient and appropriate resources for the effective functioning of the anti-corruption management system;

5) informing about the provisions of this Policy both inside and outside the organization;

6) involvement of teaching staff and employees of the Company in the ideas of the importance of effective anti-corruption management and compliance with the requirements of the anti-corruption management system;

7) continuous improvement of the anti-corruption system;

8) motivating employees to use procedures for informing about alleged or actual cases of corruption;

9) providing guarantees that none of the teaching staff and employees will be subjected to discrimination or disciplinary measures for reporting violations committed in the Company, made out of good faith or due to a reasonable assumption, or for refusing to participate in corrupt actions, even if such refusal may lead to losses for the Company;

10) bringing persons guilty of committing a corruption offense, as well as persons assisting them to responsibility established by the legislation of the Republic of Kazakhstan;

11) submission of periodic reports to higher management bodies and interested organizations on the construction and functioning of the anti-corruption system.

The heads of the Company's structural divisions are responsible for:

1) creation and implementation of a system for preventing and combating corruption in supervised departments and processes;

2) conducting a qualitative and timely analysis of corruption risks in supervised processes and the development and implementation of measures to reduce corruption risks;

3) timely response to incidents identified as indicators of corruption risk;

4) timely notification to the compliance officer about the facts that have become known to them of violations of the requirements of this Policy and the legislation of the Republic of Kazakhstan committed by the Company's employees and employees, regardless of the division and management level;

5) the commission of corruption crimes by directly subordinate staff members and employees of the Company, if a link is established between a corruption crime committed by a subordinate and the fault of the head in non-fulfillment or improper performance of official duties to prevent the commission of corruption offenses.

Teaching staff and employees of the Company:

1) are obliged to comply with the requirements established by this Policy, the Company's Code of Business Ethics, other internal documents and legislation, or report the impossibility of their compliance to the direct manager;

2) are obliged to immediately inform the compliance officer or contact the hotline if they become aware of a committed or planned corruption offense;

3) if necessary, explain the provisions of this Policy to consumers of educational services, corporate partners and colleagues;

4) bear personal disciplinary, administrative and criminal responsibility for non-compliance with the requirements of the current legislation of the Republic of Kazakhstan and this Policy.

All teaching staff, employees and members of the collegial bodies of the Company are responsible for understanding, compliance and compliance with the requirements of the anti-corruption system to the extent that they are related to their role in Society.

4. ANTI-CORRUPTION SYSTEM IN SOCIETY

4.1 Goals and objectives in the field of anti-corruption

The KarIU sets the following goals in the field of anti-corruption:

- 1) Building and developing a corporate culture of rejection of corruption in any manifestations.
- 2) Implementation of management principles, policies and rules that establish standards of conduct for employees and officials of the Company.
- 3) Development and implementation of effective anti-corruption tools at all levels of government.
- 4) Minimizing the risk of involvement of the Company, employees and officials of the Company in corruption offenses.
- 5) Creation of a transparent system of corporate governance and decision-making, providing reasonable confidence in the absence of influence of factors related to the conflict of interests of the staff and employees of the Company.

Based on the strategic objectives of the Company, in accordance with the objectives in the field of combating corruption and the values of the Company, the Management Board of the Company establishes tasks in the field of combating corruption. Tasks in the field of combating corruption should be aimed at achieving the goals of the Society and be consistent with the requirements of this Policy to ensure a unified approach in the fight against corruption.

4.2 Anti-corruption requirements and guidelines

1. The most important goal of the Company in the field of combating corruption is the formation of a culture of absolute intolerance to corruption in any of its manifestations, which means the commitment of the teaching staff, employees and partners of the Company to the ideas of reliability and compliance. This goal serves as a guideline for making managerial decisions in the Company, as well as the basis for the formation of individual anti-corruption systems and key indicators of their effectiveness.

2. The Company strictly prohibits any form of corruption and bribery in relations with consumers of services, corporate partners, the state and employees. Receiving and giving a bribe is considered as a serious violation in accordance with this Policy and the legislation of the Republic of Kazakhstan. The all teaching and employees of the Company are prohibited from offering any illegal benefits to

third parties, including if, in the opinion of the all teaching and employees, this will lead to benefits for the Company.

3. The Company prohibits any form of informal payments for simplification of formalities or any services.

4. All teaching staff and employees of the Company are obliged to comply with the norms and requirements of the legislation of the Republic of Kazakhstan, this Policy and other internal documents regulating anti-corruption issues. Managers may not require subordinate employees to violate the law and this Policy. In the presence of such requirements, the employee is obliged to immediately inform the compliance officer of the Company.

5. All teaching staff and employees, if they have information about a corruption offense being prepared, committed or committed, are obliged to take the necessary measures to prevent and terminate such an offense, including immediately informing the superior manager and (or) the management of the Company and (or) the compliance officer in writing. The superior manager, the management of the Company and the compliance officer are obliged to take measures on the received report of a corruption offense in accordance with the laws of the Republic of Kazakhstan and internal documents of the Company.

6. All teaching staff, employees and managers are obliged to inform the compliance officer about any facts of violation of the requirements of this Policy and legislation, or about the impossibility of their compliance.

7. For non-compliance with the requirements of this Policy and legislation in the field of anti-corruption, liability is established in accordance with the internal documents of the Company and the legislation of the Republic of Kazakhstan.

5. ELEMENTS OF THE ANTI-CORRUPTION SYSTEM

The anti-corruption system includes:

- 1) leadership and involvement, formation of a culture of rejection of corruption;
- 2) communication and training;
- 3) analysis of corruption risks;
- 4) measures in the field of personnel management;
- 5) measures in certain processes subject to high corruption risks, anti-corruption restrictions;
- 6) prevention and resolution of conflicts of interest;
- 7) proactive information about corruption offenses;
- 8) detection, suppression, and investigation of corruption offenses;
- 9) anti-corruption monitoring;
- 10) anti-corruption expertise;
- 11) information and reporting.

The corporate culture of ethics, honesty and trustworthiness creates a favorable environment for the functioning of the anti-corruption and bribery system. Teaching staff and employees know what is right and how to act when

they face ethical problems. The Company encourages the behavior of teaching staff and employees in accordance with the principles and norms established by this Policy and other documents of the Company.

The Board of Directors and Senior Management are an example for all employees in terms of uncompromising rejection of corruption through their support, statements, behavior and actions.

The inevitability of punishment for violating the principles and norms of anti-corruption is declared at all levels of government.

The Company ensures proper and appropriate information and training of personnel on anti-corruption issues. The training should cover at least the following issues:

1) anti-corruption legislation requirements, including anti-corruption restrictions;

2) anti-corruption policy, anti-corruption procedures and system, as well as obligations to follow them;

3) corruption risks and damage to employees and society that can be caused by bribery and corruption;

4) the circumstances under which a bribe may be offered in connection with the official duties of employees and how to recognize these circumstances;

5) how the teaching staff and employees can help in countering and eliminating corruption, as well as recognize the key signs of corruption;

6) contribution of teaching staff and employees to the effectiveness of the anti-corruption system, including the benefits of improving anti-corruption activities and reporting suspected corruption;

7) possible consequences of non-compliance with the requirements of the anti-corruption system;

8) how and to whom should PPS and employees report any suspicions;

9) information about the training and resources provided.

KarIU recognizes social responsibility in terms of the development of an anti-corruption culture not only within Society, but also outside it. Teaching staff and employees of the Company, when applying for a job, as well as regularly at least 1 (one) time a year, receive information and undergo training on anti-corruption issues in accordance with their positions, corruption risks to which they are exposed, as well as any changes in circumstances. Training and information on existing anti-corruption systems are a mandatory part of training for new teaching staff and employees.

The Company must keep documented information related to training procedures, the content of training, when and to whom it is provided.

Conducting an analysis of anti-corruption risks is an essential element of an effective anti-corruption system.

The purpose of the analysis of corruption risks is to identify and study the causes and conditions that contribute to the commission of corruption offenses, corruption schemes, as well as to assess the likelihood of their implementation and impact on the achievement of the set goals by the Company.

Based on the results of the analysis of corruption risks, controls and measures are being developed to minimize the consequences of the possible occurrence of significant corruption risks and increase the effectiveness of the anti-corruption system.

The key principles of risk analysis are:

1) responding to each corruption scheme: the potential impact of any identified corruption scheme is assessed as critical and, accordingly, measures are taken to minimize potential damage;

2) focus on the most risky processes: the most attention and resources are allocated to processes with high corruption risks;

3) realistic risk assessment: clear criteria are developed for assessing the likelihood and impact of corruption risks on the Company's activities;

4) repeating process: conducting periodic analysis of corruption risks to confirm the effectiveness of existing controls within the framework of the continuous improvement program.

The analysis of corruption risks is carried out at least 1 (one) time a year and with significant changes in the factors affecting the effectiveness of the functioning of the anti-corruption system in the Company. The analysis of corruption risks is carried out when creating or substantially changing the Company's business processes. The analysis of corruption risks is carried out by all divisions of the Company without exception. Managers of all levels are responsible for the identification and assessment of corruption risks, as well as for the development of measures to reduce them. All stages of the analysis of corruption risks are carefully documented and stored in accordance with the internal documents of the Company.

The Company checks applicants applying for vacant positions before they are hired. As part of the personnel selection and promotion procedures, the judgments of the teaching staff, employees on the ethics of decisions made in various situations, as well as knowledge and understanding of anti-corruption legislation for external applicants and internal policies for internal applicants are evaluated. When developing the organizational and functional structure of the Company, an analysis is carried out for the distribution of powers and authorization to exclude conflicts of interest.

The terms of the employment contracts of teaching staff and employees provide for obligations and responsibility for compliance with anti-corruption legislation, as well as the possibility of applying disciplinary measures for violation of such obligations.

All employees accepted by the teaching staff must be familiarized with the requirements of this Policy within a reasonable time and sign an obligation to comply with it, if it is not provided for by the terms of the employment contract.

The system of proactive reporting of violations was created in order to provide an opportunity for staff, employees and other interested parties to confidentially or anonymously express their reasonable suspicions about committed or planned violations by employees of the Company or in relation to employees of the Company.

KarIU requires the teaching staff and employees to report reasonable assumptions about potential facts of corruption and any violations of existing internal documents and legislation, and also encourages well-intentioned information about their doubts.

The Company ensures confidentiality and protection from harassment of the applicant, as well as objective consideration of all communications.

KarIU recognizes that gifts and hospitality can be common expressions of goodwill and respect when building relationships in the university's business processes, taking into account certain customs and traditions. The staff and employees of the Company should be aware and understand that gifts, representation expenses, donations and other payments may be perceived by a third party (for example, the media, government agencies, other employees, shareholders, etc.) as bribes, even if neither the giver nor the receiver had such intentions.

In this regard, the Society has adopted a policy of complete rejection of the offered gifts, entertainment and hospitality. The Company requires the staff, employees, managers, members of the Management Board and the Board of Directors of the Company, corporate partners and other persons and companies acting in the interests and representing the Company to avoid accepting any gifts, invitations to entertainment events, hospitality payments, donations and any other payments that may affect and may be regarded as affecting the decisions taken by these persons related to the performance of official duties.

An exception may be non-monetary (including equivalents in the form of coupons, discounts, certificates, etc.) gifts and souvenirs, as well as food, drinks and entertainment received by participating in certain events, such as exhibitions, conferences, seminars, in which all participants are offered equal gifts and hospitality.

An exception may also be gifts on the occasion of public holidays and personal events of the donee, made by:

- 1) on behalf of the Company and the professional union of the Company;
- 2) collectively by employees of the Company's divisions;
- 3) employees of the Company who are not under the subordination and influence of the gifted person, when such gifts will not be regarded as an offer of a bribe.

Employees of the Company who have adopted anti-corruption restrictions in accordance with the Law, carry out actions in relation to the received material remuneration, gifts or services in accordance with the requirements established by law.

Each teaching staff, employee, as well as members of the Management Board and the Board of Directors of the Company are obliged, within 5 (five) working days from the moment they became aware of the offer of gifts, entertainment and hospitality, to send a written notification to the compliance officer for entering this offer into the relevant register as a factor of corruption risk of the counterparty. The notification must be sent regardless of whether gifts,

entertainment and hospitality were accepted, rejected or received without the knowledge of the donee. Gifts received without the employee's knowledge must be returned within five days with notification of the compliance officer about receipt and return, with appropriate explanations. If it is impossible to return gifts received without the knowledge of the donee, the practice may be the sharing of gifts by all employees of the unit (for example, gifts in the form of food and drinks, flowers can be offered to all employees) or their transfer to charitable purposes. The notification of the compliance officer and the public announcement of the gifts received is recognized by the Society as the correct behavior of the teaching staff, an employee in such a situation.

When discussing and offering gifts, entertainment and hospitality to the teaching staff, the Company's employees must politely refuse and explain the provisions of this Policy so that the refusal is perceived not as a manifestation of disrespect, but as a symbol of honest, open and conscientious relations.

Teaching staff and employees of the KarIU are prohibited from offering gifts to partners and consumers of the Company's services. An exception may be branded souvenirs (diaries, notebooks, pens, etc. with the Company's logo), as well as symbolic gifts on the occasion of significant dates. Teaching staff and employees are prohibited from offering gifts, entertainment and hospitality to consumers of services and corporate partners of the Company at their own expense on their own behalf and on behalf of the Company.

The Company does not participate in the financing of political activities, political and public associations, with the exception of the professional union of employees of the Company.

Teaching staff and employees of the Company may participate in legislative activities on issues related to the Company's activities. At the same time, such participation should be formalized by an appropriate order of the Chairman of the Management Board-the Rector of the Company, indicating the clear powers and responsibilities of the participating teaching staff and employees. Lobbying and other illegal promotion of the interests of Society in interaction with government agencies and employees is prohibited.

A conflict of interests arises in a situation when the personal interest (direct or indirect) of the staff, an employee of the Company (relatives and friends of the employee of the Company) affects or may affect the objectivity and integrity of the performance of his/her official duties, which can harm the rights and legitimate interests of the Company, shareholders, third parties or the state. Such situations are not necessarily associated with improper or corrupt behavior, but should be considered as factors potentially leading to violations.

Personal interest is understood as the possibility of receiving income from third parties by a staff member, an employee in the form of cash, valuables, other property or services of a proprietary nature, other property rights or benefits for himself or for third parties for non-performance or unfair performance of his official duties.

A conflict of interests may arise when relatives work together and/or employees and their relatives participate in the authorized capitals and management bodies of third parties, they carry out entrepreneurial activities or combine employees with other paid activities outside the Company. committed or planned violations by employees of the Company or against employees of the Company.

The Company requires teaching staff and employees to report reasonable assumptions about potential facts of corruption and any violations of existing internal documents and legislation, and also encourages well-intentioned information about their doubts, while the Company ensures confidentiality and protection from prosecution of the applicant, as well as objective consideration of all reports.

In order to prevent, prevent and resolve conflicts of interest of the teaching staff, the Company's employees are obliged to:

1) disclose information about a conflict of interest that has arisen or about the likelihood of its occurrence as soon as they become aware of it, in accordance with the procedures established in the Company 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 exercise of their functional responsibilities.

Each teaching staff, employee of the Company is obliged to inform the immediate supervisor about any actual or possible conflicts of interest, such as family, financial or other ties having both direct and indirect relation to their work.

Conflict of interest management processes are being created in the Company. Information about the existence of a conflict of interest and the measures taken to control it is documented and stored in accordance with the documents regulating the management of a conflict of interest.

Regular anti-corruption monitoring ensures the effectiveness of the anti-corruption system and is essential to ensure its continuous improvement, as well as to detect and prevent bribery. The purpose of anti-corruption monitoring is to assess the effectiveness of the established anti-corruption systems and internal controls in individual processes.

The subject of anti-corruption monitoring is information related to the effectiveness of the anti-corruption system and anti-corruption policy, the state of law enforcement practice in the field of anti-corruption, as well as the perception and assessment of the level of corruption in Society. Through anti-corruption monitoring, aspects of the anti-corruption system are identified that can be improved or simplified to ensure maximum efficiency and effectiveness.

The sources for anti-corruption monitoring are:

1) data of legal statistics bodies;

2) results of internal and external audits;

3) the results of the analysis of corruption risks;

4) appeals of individuals and legal entities on anti-corruption issues;

- 5) data from sociological surveys on anti-corruption issues;
- 6) publications in the mass media;
- 7) other non-prohibited sources of information.

Responsibility for conducting anti-corruption monitoring in supervised processes is borne by the head of the department - the owner of the process.

Information on the results of the anti-corruption monitoring should be brought to the compliance officer of the Company.

The Board of Directors of the Company periodically receives information on the results of the anti-corruption monitoring.

The results of anti-corruption monitoring are documented and published on the Company's Internet resources.

The anti-corruption examination of the Company's internal regulatory documents is carried out by a compliance officer.

Anti-corruption expertise is carried out in order to identify provisions in them that contribute to the creation of conditions for the manifestation of corruption and develop recommendations aimed at their elimination.

6. INFORMATION VERIFICATION, INVESTIGATION AND TAKING MEASURES AGAINST CORRUPTION

Any information about a corruption offense committed or planned should be thoroughly checked. The Company implements procedures that:

- 1) require assessment and, where applicable, investigation of any case of corruption, violation of this Policy or requirements of the anti-corruption management system that have been identified or reasonably suspected or about which information has been received;

- 2) require appropriate measures to be taken if the investigation establishes the fact of bribery, violation of the Anti-Corruption Policy or the requirements of the anti-corruption system;

- 3) give powers and provide opportunities to persons conducting an investigation;

- 4) require the relevant personnel to cooperate in the investigation;

- 5) require that the investigation be conducted confidentially, and that its results also be confidential.

The investigation should be conducted, and information should be transmitted to personnel who do not hold positions and are not involved in the performance of functions that are the subject of the investigation. If there is a lack of competence of the Company's internal experts, third parties may be involved in the investigation.

Based on the results of the investigation, effective measures should be taken to eliminate the causes and reduce the negative impact of the identified violations, as well as to improve the internal control system in the processes being audited.

Disciplinary measures are applied in accordance with the legislation of the Republic of Kazakhstan against the teaching staff and employees who have committed a violation.

7. C ONCLUSION

In case of non-compliance with the requirements stipulated by this Policy, the teaching staff and employees of the KarIU are liable in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company.

In the event of a change in the name and/or functionality of any of the structural divisions, the rights and obligations of the reorganized division automatically pass to its successor.

In the case of distribution of functionality between several divisions, the rights and obligations of the reorganized division are transferred jointly to all legal successors. In this case, the procedure for the performance of duties and the exercise of rights required in accordance with this Policy is determined by the legal successors themselves in agreement with each other.

Amendments and additions to this Policy are made as necessary.

The Company's Management Board and/or compliance Officer are responsible for making changes and additions to this Policy.

The content of this Policy must be brought to the attention of the Company's employees in accordance with the procedure established by the Company's regulatory documents and procedures.

Control over familiarization with the provisions of this Policy is assigned to the heads of the Company's structural divisions.

Confirmation of familiarization of the teaching staff/employee with the Anti-Corruption Policy and the commitment he has accepted to fulfill anti-corruption requirements at the NJSC Karaganda Industrial University

I confirm that I have studied the Anti-Corruption Policy at the NJSC "Karaganda Industrial University". I undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy at the NJSC "Karaganda Industrial University". I am notified that if I violate the anti-corruption legislation of the Republic of Kazakhstan, the Anti-Corruption Policy at the NJSC "Karaganda Industrial University", I may be prosecuted, including dismissed from my post, in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

Department (division) _____

Position	Full name	Date	Signature

