Appendix

to the order of the Chairman of the Board-Rector

of the non-profit joint-stock company

"M. Auezov South Kazakhstan University"

"\_\_\_\_" \_\_\_\_\_\_\_\_\_ 2022 No.

**ANTI-CORRUPTION POLICY OF N-PJSC "M. AUEZOV SOUTH KAZAKHSTAN UNIVERSITY"**

**1. Objectives and tasks of implementing the anti-corruption policy**

1.1. The anti-corruption policy has been developed in accordance with the provisions of the Law of the Republic of Kazakhstan "On Combating Corruption" dated November 18, 2015 No. 410-V; the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026 dated February 2, 2022.

This Anti-Corruption Policy is an internal act of N-PJSC "M. Auezov SKU" (hereinafter referred to as SKU), aimed at preventing and suppressing corruption offenses in the activities of SKU.

• Anti-corruption policy is a set of legal, administrative and organizational measures aimed at reducing corruption risks, developing an anti-corruption culture, and increasing public confidence in the activities of the SKU.

The main objectives of the implementation of the Anti-Corruption Policy at SKU are:

• minimizing the risk of the University being involved in a corruption offense;

• developing a uniform understanding of the SKU policy on the rejection of corruption in any form and manifestation among SKU employees and students, regardless of their position, level, or form of education;

• explaining the main requirements of the legislation of the Republic of Kazakhstan in the field of combating corruption.

• In order to achieve the stated objectives, the following tasks for the implementation of the Anti-Corruption Policy at SKU are established:

1) developing intolerance to corruption;

2) eliminating opportunities for corruption;

3) improving measures to ensure accountability;

4) strengthening the role of civil society in combating corruption;

5) ensuring the effectiveness of anti-corruption monitoring;

6) improving the activities of the anti-corruption compliance service.

**2. Basic principles of anti-corruption activities of the SKU**

2.1 The anti-corruption system in the South Ukrainian University is based on the following principles:

1) Publicity, openness and transparency;

2) Comprehensive use of anti-corruption measures;

3) Priority of corruption prevention;

4) Interaction between government agencies and civil society;

5) Efficiency and effectiveness;

6) Non-acceptance of corruption in all its manifestations;

7) Protection of persons assisting in combating corruption;

8) Inevitability of responsibility for corruption.

**3. Organizational structure responsible for the implementation of the Anti-Corruption Policy**

3.1 Anti-Corruption Compliance Service is an organizational structure of the University responsible for organizing all activities aimed at combating corruption.

3.2 Main responsibilities of the organizational structure responsible for the implementation of the Anti-Corruption Policy:

• preparation of recommendations for decision-making on issues of combating corruption in SKU;

• preparation of proposals aimed at eliminating the causes and conditions that give rise to the risk of corruption in SKU;

• identification of corruption offenses;

• organization of corruption risk assessment;

• organization of training events on issues of preventing and combating corruption;

• assistance to representatives of supervisory and law enforcement agencies during their inspections of SKU activities on issues of preventing and combating corruption;

• assessment of the results of anti-corruption work and preparation of relevant reporting materials.

**4. Responsibilities of the employees of the UCU related to the prevention and combating of corruption**

All employees, regardless of their position and length of service at YUKU, in connection with the performance of their official duties must:

• be guided by the provisions of this Policy and strictly comply with its principles and requirements;

• refrain from behavior that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offense.

**5. Anti-corruption measures**

5.1. As an appendix to this Policy, the Anti-Corruption Action Plan is annually approved in the SKU, indicating the deadlines for their implementation and the person responsible for them.

5.2. In order to prevent corruption, improve legal literacy and create zero tolerance for corruption, the SKU adopted the Anti-Corruption Standard and the Code of Ethics with the main requirements for the moral and ethical character of the university employee and students.

5.3. One of the elements of the Anti-Corruption Policy is the assessment of corruption risks. The purpose of the corruption risk assessment is to determine specific factors in the activities of the SKU, during the implementation of which there is a high probability of SKU employees committing corruption offenses for personal gain.

5.4. The SKU should conduct training for employees on issues of preventing and combating corruption on the following topics:

• legal liability for committing corruption offenses;

• familiarization with the requirements of legislation and internal documents of the SKU on anti-corruption issues and the procedure for their application in the activities of the SKU.

5.5. Internal control carried out by the SKU contributes to the prevention and detection of corruption offenses. The purpose of internal control is to ensure that the activities of the SKU comply with the requirements of regulatory legal acts and local regulatory acts of the SKU.

5.6. When interacting with partners, the SKU informs about the anti-corruption standards for conducting activities adopted at the university, including the possible inclusion of certain provisions on compliance with anti-corruption standards in contracts. The SKU strives to establish and maintain business relations with those partners who conduct business relations in a conscientious and honest manner, care about their own reputation, demonstrate support for high ethical standards, implement their own measures to combat corruption, and participate in collective anti-corruption initiatives.

5.7. The SKU informs the public about the level of implementation and successes in the implementation of anti-corruption measures, including by posting relevant information on the official website on the Internet.

**6. Responsibility for failure to comply with the requirements of the Anti-Corruption Policy**

6.1. All employees and students of the SKU must comply with the current anti-corruption legislation of the Republic of Kazakhstan and the requirements of this Anti-Corruption Policy.

6.2. Persons guilty of violating the anti-corruption legislation and the requirements of this Anti-Corruption Policy may be subject to disciplinary, administrative, civil and criminal liability.