APPROVED
by the Resolution
of the Board of Directors
of Shakarim University
of Semey NJSC
(Minutes No. 4
dated March 29, 2024)

ANTI-CORRUPTION POLICY of the Shakarim University of Semey NJSC

Semey, 2024

CONTENT

1. General Provisions

1.1. The Anti-Corruption Policy of Shakarim University of Semey NJSC (*hereinafter referred to as the Anti-Corruption Policy or the Policy*) has been developed in accordance with the provisions of the Law of the Republic of Kazakhstan «On Combating Corruption» (*hereinafter referred to as the Law*), the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022–2026, approved by Presidential Decree No. 802 dated February 2, 2022, the anti-corruption legislation of the Republic of Kazakhstan, as well as the Charter and other internal (local) regulations and documents of Shakarim University of Semey NJSC (*hereinafter referred to as the Company or the University*). The Policy is aimed at establishing an effective anti-corruption system within the Company and fostering anti-corruption awareness among employees, faculty members, and students.

1.2. This Anti-Corruption Policy is the Company's fundamental document defining the main objectives and tasks of preventing corruption offenses at the University, the principles and organization of corruption prevention, the participants in the process, their responsibilities, functions, powers, and accountability, including in relations with third parties, including individuals, legal entities, government authorities, and their representatives.

1.3. The University adheres to the principle of zero tolerance for all forms of corruption in the course of its activities.

The Anti-Corruption Policy establishes the managerial and organizational framework for preventing corruption offenses, as well as measures aimed at minimizing their consequences. Университет в своей деятельности придерживается принципа нетерпимости к любым видам коррупционных проявлений.

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

1.5. Anti-corruption activities carried out within the University shall be coordinated by the Head of the Anti-Corruption Compliance Service and the Member of the Management Board – Vice-Rector for Social and Cultural Development.

1.6. The University expects its employees, *regardless of their position*, to adhere to the ethical principles set forth, including those established in the Company's Corporate Code of Ethics, as well as to the approaches and requirements of this Policy, subject to the established restrictions *(Appendix No. 1).*

1.7. Neither the University nor its employees may circumvent the requirements of this Anti-Corruption Policy through the activities of counterparties, including consultants, or any other third parties.

1.8. This Anti-Corruption Policy serves as the basis for the development and adoption of the Company's internal (local) regulations and other documents in the field of anti-corruption.

2. Scope

2.1. The Anti-Corruption Policy contains mandatory rules and regulations applicable to all employees of the Company, regardless of their position, job functions, or length of employment.

2.2. Certain provisions of the Anti-Corruption Policy also apply to individuals and/or legal entities with whom the Company enters into contractual or other legal relationships (*agreements*, *contracts, arrangements, etc.*) concluded by the Company with counterparties and other third parties.

2.3. All employees of the Company are prohibited from directly or indirectly, personally or through intermediaries, participating in any actions that may lead to corruption offenses.

2.4. This Policy shall be published on the official website of the University.

3. Terms and Definitions

The following terms and definitions are used in this Anti-Corruption Policy:

1) *anti-corruption policy* – legal, administrative, and organizational measures aimed at reducing corruption risks, increasing public confidence in the activities of public authorities, and other measures in accordance with the Law of the Republic of Kazakhstan «On Combating Corruption»;

2) *corruption* – the unlawful use by persons holding a responsible public office, persons authorized to perform public functions, persons equated to persons authorized to perform public functions, and officials of their official powers and related opportunities

for the purpose of obtaining or deriving, personally or through intermediaries, property (non-property) benefits and advantages for themselves or third parties, as well as bribing such persons by providing benefits and advantages;

3) *combating corruption* – the activities of anti-corruption entities, within the limits of their authority, aimed at preventing corruption, including the development of an anti-corruption culture in society, identifying and eliminating the causes and conditions contributing to corruption offenses, as well as detecting, suppressing, disclosing, and investigating corruption offenses and eliminating their consequences;

4) *authorized anti-corruption body* – a state body responsible for the development and implementation of the anti-corruption policy of the Republic of Kazakhstan, coordination in the field of combating corruption, as well as the prevention, detection, suppression, disclosure, and investigation of corruption offenses, including its territorial subdivisions;

5) *corruption offense* – an unlawful culpable act (action or omission) containing elements of corruption for which administrative or criminal liability is established by law;

6) *corruption risk* – the possibility of causes and conditions arising that contribute to the commission of corruption offenses;

7) *anti-corruption restrictions* – restrictions established by the Law of the Republic of Kazakhstan "On Combating Corruption" and aimed at preventing corruption offenses;

8) *anti-corruption standard* – a system of recommendations established for the Company's activities and aimed at preventing corruption;

9) *Anti-corruption compliance* – a function ensuring compliance by the relevant organization, its employees, and students with the legislation of the Republic of Kazakhstan in the field of combating corruption and other anti-corruption regulatory requirements established by the legislation of the Republic of Kazakhstan and international treaties ratified by the Republic of Kazakhstan, which the Company is obliged to follow, as well as internal (local) regulations and documents of the Company establishing policies and procedures for compliance with such requirements;

10) *anti-corruption clause* – a provision of a contract or other document containing a requirement, the fulfillment of which is aimed at combating corruption;

11) *conflict of interest* – a contradiction between the personal interests of persons holding a responsible public office, persons authorized to perform public functions, persons equated to them, officials, and their official powers, in which the personal interests of such persons may lead to the non-performance and/or improper performance of their official duties;

12) *personal interest* – the possibility for an employee of the Company, in connection with the performance of their employment duties, to receive income in the form of money, valuables, other property, including property rights, or property-related services for themselves or third parties;

13) *business ethics* – a set of moral and ethical principles, standards of business communication, and official conduct that guide the activities of the Company's employees and officials;

14) *officials* – members of the Board of Directors, members of the executive body (Management Board), and other members of the Company's senior management;

15) *university employee* – an individual who is in an employment relationship with the employer and directly performs work under an employment agreement or contract;

16) *student* – a person receiving education at the University;

17) *counterparty* – a party to a transaction concluded with the University;

18) *academic integrity* – a set of moral and ethical standards, principles, and values that determine the conduct of every member of the University community in the learning and teaching process, including the preparation and assessment of written assignments, the avoidance of plagiarism, adherence to academic standards, observance of honesty and integrity in research and publications, as well as in the relationships among participants in the educational process;

19) *plagiarism* – the intentional or negligent, full or partial unlawful use, appropriation, or disposal of protected results of another person's work, including the results of academic, scientific, research, journalistic, and analytical activities, accompanied by presenting

oneself to others as the actual author;

20) *cheating* – dishonest conduct by a student or employee involving the copying of another person's intellectual work;

21) *duplication* – the submission of the same work for different assessments and requirements, including an attempt to present, in whole or in part, any work that has already been assessed in another course as one's own without the prior permission of the faculty member, even if the student is its author;

22) *falsification* – the forgery of academic records or other documents; falsification of data (including observations during scientific experiments, records, or survey results); forgery of signatures on academic work; or the intentional falsification or damage of academic work;

23) *concealment* – the suppression or withholding of information regarding the dishonest presentation of false information in academic work; substitution of research and experimental data and results; or submission of false information obtained during research;

24) *collusion* – a mutual agreement between participants in the educational process to complete any academic work subject to review and assessment on behalf of another student;

25) *administrative and economic functions* – the right, granted in accordance with the legislation of the Republic of Kazakhstan, to manage and dispose of property recorded on the organization's balance sheet;

26) *organizational and administrative functions* – the right, granted in accordance with the legislation of the Republic of Kazakhstan, to issue orders and instructions binding upon subordinate employees, as well as to apply incentives and disciplinary measures to subordinates;

27) *monitoring* – a procedure aimed at overseeing the effectiveness of the anti-corruption measures implemented by the Company, assessing corruption risks, and developing forecasts for improving the existing system and applied measures based on the analysis and evaluation of information and data;

28) *internal analysis of corruption risks* – the Company's activities aimed at identifying the causes and conditions that contribute to the commission of corruption offenses.

3.2. Definitions used but not specified in this Policy shall correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter, and other internal (local) regulations and documents of the Company.

4. Objectives, Tasks, and Principles of the Anti-Corruption Policy

4.1. This Anti-Corruption Policy has been developed for the purpose of identifying, preventing, and minimizing cases of unlawful, unethical, and corrupt conduct by the University's employees and students.

4.2. The Anti-Corruption Policy is aimed at ensuring that all employees, managers, and students of the University have a uniform understanding of the nature, forms, and manifestations of corrupt practices in order to prevent and suppress situations and actions that may, including potentially, violate the requirements of the anti-corruption legislation of the Republic of Kazakhstan.

4.3. The main objectives of implementing the Anti-Corruption Policy within the Company are:

1) to ensure the protection of the rights and legitimate interests of citizens against negative processes and phenomena associated with corruption offenses and to strengthen public confidence in the Company's activities;

2) to establish a uniform understanding of the Anti-Corruption Policy among the Company's employees, regardless of their position, students, counterparties, and other persons, ensuring non-acceptance of corruption in any form and manifestation and intolerance of corrupt behavior;

3) to minimize the risk of the Company, its employees, and students becoming involved in corruption-related activities;

4) to identify the conditions and causes contributing to corruption offenses and eliminate their consequences;

5) to summarize and clarify the main requirements of the legislation of the Republic of Kazakhstan on combating corruption as applied within the University.

4.4. To achieve these objectives, the following tasks shall be established for the implementation of the Anti-Corruption Policy within the Company:

1) to establish the basic principles and rules for the prevention and deterrence of corruption offenses at the University;

2) to establish effective mechanisms, procedures, control measures, and other activities aimed at preventing corruption and minimizing the risk of the University, its employees, and students becoming involved in corruption-related activities;

3) to establish the list of anti-corruption measures, standards, and procedures implemented by the University, as well as the procedure for their implementation;

4) to monitor corruption risk factors and the effectiveness of measures taken to implement the Anti-Corruption Policy;

5) to foster a culture of ethical conduct and intolerance toward all manifestations of corruption, including a uniform standard of anti-corruption conduct among the University's employees and students;

6) to integrate anti-corruption principles into strategic and operational management at all levels of the University's activities;

7) to improve the efficiency of management and the quality and accessibility of educational services provided by the University;

8) to enhance the effectiveness and efficiency of the University's educational, research, organizational, and methodological activities in order to minimize and prevent corruption risks and situations;

9) to ensure openness and transparency of activities and facilitate the exercise of citizens' right to access information on the University's activities;

10) anti-corruption awareness-raising;

11) to facilitate the exercise of the rights of citizens and organizations to access information on corruption facts and corruption-related factors, as well as their free coverage in the mass media;

12) to inform the University's Board of Directors of corruption-related actions and the measures taken within the framework of corruption prevention;

13) to determine the list of persons responsible for the implementation of the Anti-Corruption Policy;

14) to apply liability measures to persons involved in committing corruption offenses.

5. Fundamental Principles of Anti-Corruption

In accordance with Article 4 of the Law of the Republic of Kazakhstan "On Combating Corruption," anti-corruption efforts in the Republic of Kazakhstan are based on the following fundamental principles:

1) legality;

2) priority of protecting human and civil rights, freedoms, and legitimate interests;

3) openness and transparency;

4) nteraction between the State and civil society;

5) systematic and comprehensive application of anti-corruption measures;

6) priority of preventive anti-corruption measures;

7) encouragement of persons assisting in combating corruption;

8) inevitability of punishment for committing corruption offenses.

5.1 The system of anti-corruption measures within the Company is based on the following key principles:

1) *principle of legality* – the Anti-Corruption Policy and anti-corruption measures implemented by the Company comply with the Constitution, the legislation of the Republic of Kazakhstan, international treaties and agreements ratified and concluded by the Republic of Kazakhstan, other regulatory legal acts of the Republic of Kazakhstan, and the internal (local) regulations and documents governing anti-corruption activities applicable to the Company's operations;

2) *principle of zero tolerance for all manifestations of corruption* – the Company adheres to the principle of complete non-acceptance of corruption in any form or manifestation in the course of its activities. The principle of zero tolerance means a strict prohibition on officials and employees of the Company acting on behalf of or in the interests of the Company from directly or indirectly, personally or through any intermediary, participating in corrupt practices.

3) Principle of personal example and uncompromising attitude toward corruption – the Board of Directors and the Management Board of the Company play a key role in fostering a culture of intolerance toward corruption and establishing an effective system for preventing and combating corruption within the Company. Members of the Board of Directors and the Management Board demonstrate to employees and counterparties an uncompromising attitude toward all forms and manifestations of corruption at all levels and uphold this principle by personal example;

4) principle of employee involvement – employees and students of the Company shall be informed of the requirements of anti-corruption legislation and shall actively participate in the development and implementation of anti-corruption standards and procedures;

5) principle of proportionality of anti-corruption procedures to corruption risks – the development and implementation of a set of measures aimed at reducing the likelihood of the Company's employees becoming involved in corruption-related activities, taking into account the corruption risks inherent in the Company's activities as a whole and in its individual structural units;

6) principle of effectiveness of anti-corruption procedures and measures – the application within the Company of anti-corruption procedures and measures aimed at achieving maximum effectiveness, ensuring impartiality, simplicity, openness in their implementation, and proportionality between the costs incurred and the anti-corruption measures applied by the Company;

7) principle of due diligence – the Company conducts due diligence on third parties and employment candidates before making a decision to establish or continue business or employment relationships in order to assess their integrity, commitment to anti-corruption principles, and the absence of conflicts of interest;

8) *principle of interaction and coordination* – the Company ensures interaction and cooperation in the field of anti-corruption with government authorities and third parties, as well as coordination of actions in the process of combating corruption;

9) *principle of responsibility and inevitability of punishment* – the Company declares the inevitability of punishment for employees regardless of their position, length of service, or other circumstances if they commit corruption offenses in the performance of their official duties, in accordance with the procedure established by the applicable legislation, as well as the responsibility of the Company's management for the implementation of the Anti-Corruption Policy. Other subjects of

the Anti-Corruption Policy shall be held liable in accordance with the procedure established by the legislation of the Republic of Kazakhstan applicable to the relevant legal relations;

10) *principle of control and monitoring* – the Company carries out regular monitoring of the effectiveness of the implemented anti-corruption standards and procedures and supervises their compliance;

11) *principle of openness* – informing the public about the Anti-Corruption Policy implemented by the Company.

6. Persons Responsible for the Implementation of the Anti-Corruption Policy and Distribution of Functions

6.1. The following bodies and persons shall be responsible for organizing the implementation of this Anti-Corruption Policy within the Company: the Board of Directors (Audit Committee), the Chairman of the Management Board – Rector, and the Head of the University's Anti-Corruption Compliance Service.

6.2. The Company's Board of Directors (Audit Committee) shall determine the objectives, tasks, and principles of the Anti-Corruption Policy and shall oversee the overall results of the implementation and application of this Policy within the Company.

6.3. The Chairman of the Management Board – Rector and the Head of the Company's Anti-Corruption Compliance Service shall be responsible for organizing activities aimed at implementing the objectives, tasks, and principles of this Policy, including determining the structural subdivisions responsible for developing, implementing, and monitoring anti-corruption procedures, as well as submitting reports on the implementation of measures to ensure compliance with this Policy.

6.4. Based on the established objectives, the specifics of the University's activities, staffing levels, and organizational structure, the Chairman of the Management Board – Rector shall, by order, appoint persons responsible for the implementation of the Anti-Corruption Policy from among the supervising Vice-Rectors, heads of structural subdivisions, and Deans of the Company's faculties, taking into account their competence, and shall also establish a commission on compliance with corporate ethics and settlement of conflicts of interest, as well as other necessary commissions.

6.5. The main responsibilities of the persons responsible for the implementation of the Anti-Corruption Policy are:

1) to prepare recommendations for decision-making on anti-corruption matters at the University;

2) to prepare proposals aimed at eliminating the causes and conditions that create the risk of corruption within the University;

3) to develop and submit, within their respective competence, draft internal (local) regulations and documents to the Board of Directors, the Management Board, and the Academic Council of the University for approval, aimed at implementing anti-corruption measures;

4) to conduct control measures aimed at identifying corruption offenses committed by the University's employees;

5) to receive and review, in cooperation with the Anti-Corruption Compliance Service, reports of attempts to induce employees to commit corruption offenses in the interests of or on behalf of another organization, as well as reports of corruption offenses committed by employees, counterparties of the Company, or other persons;

6) to organize the completion and review of conflict of interest declarations;

7) to organize corruption risk assessments;

8) to organize training activities on corruption prevention and anti-corruption, as well as provide individual consultations to employees;

9) to participate in organizing and conducting anti-corruption awareness activities;

10) to assist authorized representatives of supervisory, control, and law enforcement authorities in conducting inspections of the Company's activities related to corruption prevention and anti-corruption;

11) to evaluate the results of anti-corruption activities, prepare the relevant reporting materials, and submit them to the Anti-Corruption Compliance Service within the timeframes established by the Regulations.

6.6. All employees, regardless of their position and length of service with the Company, in the performance of their official duties shall:

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

2) refrain from committing and/or participating in corruption offenses in the interests of or on behalf of the Company;

3) refrain from conduct that may be interpreted by others as a willingness to commit or participate in the commission of an offense in the interests of or on behalf of the Company;

4) immediately inform their immediate supervisor and the Anti-Corruption Compliance Service of any attempts to induce them to commit corruption offenses;

5) immediately inform their immediate supervisor and the Anti-Corruption Compliance Service of any actual or potential conflict of interest.

6.7. All students of the University shall:

1) be guided by the provisions of this Anti-Corruption Policy and strictly comply with its principles and requirements;

2) refrain from conduct that may be interpreted by others as a willingness to commit or participate in a corruption offense.

7. Requirements of the Anti-Corruption Legislation of the Republic of Kazakhstan and Obligations for Its Compliance.

7.1. In accordance with the anti-corruption legislation of the Republic of Kazakhstan, the following constitute corruption crimes/offenses for which liability is established (including, but not limited to):

Corruption and other criminal offenses against the interests of the public service and public administration:

1) misappropriation or embezzlement of entrusted property committed by an official, where such acts are associated with the use of their official position;

2) legalization (laundering) of money and/or other property obtained through criminal means, committed by an official, where such acts are associated with the use of their official position;

3) economic smuggling committed by an official, where such acts are associated with the use of their official position;

4) abuse of official authority or excess of official powers;

5) unlawful participation in entrepreneurial activities;

6) obstruction of lawful entrepreneurial activities;

7) acceptance of a bribe, giving of a bribe, and mediation in bribery;

8) official forgery;

9) official inaction;

10) negligence.

Administrative corruption offenses:

1) unlawful provision of material remuneration by individuals and legal entities;

2) unlawful receipt of material remuneration by a person authorized to perform public functions or a person equated to such a person;

3) unlawful provision of material remuneration by legal entities;

4) unlawful entrepreneurial activity and receipt of unlawful income by state bodies and local self-government bodies;

5) failure of heads of state bodies to take anti-corruption measures;

6) employment of persons previously convicted of a corruption crime.

7.2. The Company, its officials, and employees shall comply with the requirements of the anti-corruption legislation, as well as the principles and requirements of this Policy. In implementing this Policy, the Company proceeds from the principle that its officials and employees are prohibited, directly or indirectly, personally or through third parties, from participating in corrupt practices, including:

1) offering, promising, or carrying out unlawful actions aimed at giving a bribe, i.e., providing or promising to provide any financial or other benefit or advantage with the intent to induce any person to improperly perform their official duties;

2) demanding, agreeing to accept, or accepting a bribe, i.e., receiving or agreeing to receive any financial or other benefit or advantage for the improper performance of official duties;

3) offering, promising, or making payments, except where permitted by law, or giving gifts to persons authorized to perform public functions, as well as persons equated to them, in order to expedite or simplify established procedures;

4) offering, promising, or making payments to third parties where

there is reason to believe that such payments may be used to expedite or simplify established procedures;

5) offering, promising, or providing employment with the Company (including temporary employment) in exchange for obtaining a personal benefit;

6) facilitating or accepting inflated or fictitious payments from third parties;

7) giving or receiving gifts or hospitality that are contrary to the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the Company's internal (local) regulations and documents.

8. Duties of Officials and Employees of the Company

8.1. In the course of their professional activities, the Company's officials shall strictly comply with the following standards of conduct:

1) comply with the legislation of the Republic of Kazakhstan and this Policy;

2) act honestly and with integrity in business relations and refrain from any dishonest methods of performing their official duties;

3) refrain from any actions that may discredit the Company;

4) not use their official position, confidential information, or the Company's tangible and intangible assets for personal purposes;

5) refrain from unlawful actions or actions that may give rise to doubts regarding their legality or ethical nature;

6) maintain and require from colleagues a high level of legal and anti-corruption culture;

7) refrain from assisting anyone in carrying out entrepreneurial or other income-generating activities;

8) not induce other employees to commit corruption offenses and not encourage such actions;

9) prevent violations of official duties and, in accordance with the established procedure, take measures to prevent and resolve conflicts of interest.

8.2. Employees of the Company shall:

1) refrain from committing and/or participating in corruption offenses in the interests of or on behalf of the Company;

2) refrain from conduct that may be interpreted by others as a

willingness to commit or participate in a corruption offense in the interests of or on behalf of the Company;

3) inform their immediate supervisor and the Anti-Corruption Compliance Service of any actual or potential conflict of interest. If there are any doubts regarding the correctness of their actions or any other standards of conduct, the Company's officials and employees may seek guidance from senior management and the Company's Anti-Corruption Compliance Service.

9. Main Areas of Anti-Corruption Activities

9.1. The main areas of the Company's anti-corruption activities are:

1) implementation of the Company's unified policy in the field of combating corruption;

2) development and implementation of internal (local) regulations and documents aimed at preventing corruption;

3) planning, implementation, and analysis of measures to prevent corruption offenses;

4) establishment of an effective mechanism for cooperation between the Company and government authorities, external organizations, citizens, and civil society institutions on anti-corruption matters;

5) implementation of administrative and other measures aimed at encouraging the Company's employees to take a more active role in combating corruption and fostering a negative attitude toward corrupt behavior;

6) ensuring openness, fair competition, and objectivity in the provision of services;

7) ensuring transparency of the management system, access to information on the Company's activities, and management decision-making based on reliable data;

8) participation in public rankings of higher education institutions based on comprehensive sociological studies regarding the level of corruption;

9) teaching legal disciplines to develop anti-corruption awareness among participants in the educational process;

10) organizing measures to identify and prevent scientific

plagiarism at the University;

11) operation of the «Rector's Blog», the «Head of the Anti-Corruption Compliance Service's Blog», a hotline, suggestion boxes, and similar channels for proposals and complaints from students;

12) monitoring student satisfaction through sociological surveys, including the «Teacher through Students' Eyes» questionnaire, surveys conducted as part of the «Clean Examination Session» campaign, and similar initiatives;

13) operation of the «Sanali Yrpaq» Student Club and cooperation with student self-government organizations and civil society institutions.

10. Preventive Anti-Corruption Measures

10.1. Anti-corruption is implemented through the University's activities, within the scope of its authority, by:

1) fostering intolerance toward corrupt practices in any form;
2) conducting an internal analysis of corruption risks;
3) promoting corporate and social responsibility in the field of combating corruption offenses;
4) preventing corruption offenses;
5) communicating the rules and requirements of this Policy to all employees and students of the University;
6) preventing the acceptance of material remuneration, gifts, or services in exchange for actions (or inaction) in favor of the persons providing them, where such actions fall within the official powers of persons equated to persons authorized to perform public functions, or where such persons, by virtue of their official position, may facilitate such actions (or inaction).

10.2.The areas of the University's activities in which corruption risks may arise include:

1) gifts and hospitality expenses;
2) involvement of third parties in anti-corruption activities;
3) human resources management;
4) public procurement.

10.3. Internal analysis of corruption risks and other measures.

An internal analysis of corruption risks means activities aimed at identifying and studying the causes and conditions that contribute to the commission of corruption offenses.

The internal analysis of corruption risks shall be conducted by a structural subdivision, a person authorized to conduct such analysis, as designated by the head of the entity conducting the internal analysis of corruption risks, or by a working group established by the decision of such head.

The frequency of conducting the internal analysis of corruption risks shall be determined by the University.

10.4. The internal analysis of corruption risks shall be carried out in the following areas:

1) identification of corruption risks in regulatory legal acts affecting the University's activities;

2) identification of corruption risks in the University's organizational and managerial activities.

Regulatory legal acts affecting the University's activities shall be reviewed to identify discretionary powers and provisions that may contribute to the commission of corruption offenses.

10.5. The University's organizational and managerial activities include the following issues

1) human resources management, including staff turnover;

2) settlement of conflicts of interest;

3) provision of public services;

4) implementation of permitting functions;

5) implementation of control functions;

6) other issues arising from the University's organizational and managerial activities.

10.6. Based on the results of the internal and external analysis of corruption risks, an analytical report shall be prepared containing:

1) information on the identified corruption risks;

2) recommendations for their elimination;

3) timeframes for implementing the recommendations aimed at eliminating the identified corruption risks.

The analytical report with recommendations on eliminating the identified corruption risks shall be submitted to the Board of Directors and the Chairman of the Management Board – Rector of the University for consideration and appropriate action.

11. Anti-Corruption Standard

11.1. For the purpose of implementing anti-corruption standards of conduct for employees, the University establishes general rules and principles of conduct relating to business ethics and aimed at promoting ethical and conscientious conduct by employees and the Company as a whole.

Such rules and principles of conduct are set forth in the Anti-Corruption Standard, the Corporate Code of Ethics, and other relevant acts.

The Anti-Corruption Standard is a system of recommendations established for the University's activities and aimed at preventing corruption.

The Anti-Corruption Standard shall be taken into account in the development of the University's internal documents.

The Anti-Corruption Standard defines the actions and decisions of persons working at the University and is aimed at ensuring their compliance with the rules and standards of conduct established by the University's internal (local) regulations and documents.

11.2. The purpose of the Anti-Corruption Standard is to establish a system of recommendations aimed at preventing corruption, ensuring compliance with anti-corruption legislation, improving legal awareness in this area, creating an atmosphere of zero tolerance for all manifestations of corruption, and preventing their negative consequences in the activities of the Company, its employees, and students.

11.3. The main objectives of the Anti-Corruption Standard are:

1) to foster sustainable anti-corruption conduct and culture among the Company's employees, faculty members, and students in the course of their activities;

2) to ensure the timely identification of corruption manifestations, eliminate the causes and conditions giving rise to corruption, and prevent their negative consequences;

3) to improve legal awareness and promote zero tolerance for all manifestations of corruption;

4) to prevent and resolve conflicts of interest and ensure compliance with the rules of corporate ethics;

5) to cooperate with government authorities engaged in combating corruption, public associations, and other organizations on

anti-corruption matters.

12. Financial Control Measures, Internal Control and Audit

12.1. All financial transactions shall be accurately and properly recorded in the Company's accounting records with an adequate level of detail, documented, and available for verification.

12.2. The Company shall appoint employees who shall be responsible, in accordance with the applicable legislation of the Republic of Kazakhstan, for the preparation and submission of complete and reliable financial statements within the time limits established by the legislative acts of the Republic of Kazakhstan.

12.3. For the purpose of financial control, persons equated to persons authorized to perform public functions and their spouses shall submit declarations of income and property.

The declaration of income and property shall be prepared in accordance with the tax legislation of the Republic of Kazakhstan and submitted in the form, manner, and within the time limits established by the tax legislation of the Republic of Kazakhstan.

Failure to submit a declaration of income and property, or submission of incomplete or inaccurate information in such declarations, where the act does not constitute a criminal offense, shall entail liability provided for by the Code of the Republic of Kazakhstan on Administrative Offenses.

The information contained in the declarations submitted by persons performing managerial functions in the Company shall be subject to publication no later than 31 December of the year following the reporting calendar year.

12.4. The internal control system contributes to the prevention and detection of corruption offenses within the Company. Particular importance is attached to the implementation of such internal control and audit objectives as ensuring the reliability and accuracy of financial (accounting) reporting and ensuring the Company's compliance with the requirements of regulatory legal acts and internal (local) regulations and documents.

For this purpose, the internal control and audit system shall take into account the requirements of the Anti-Corruption Policy implemented by the Company, including:

1) verification of compliance with various organizational procedures and operating rules that are significant for corruption prevention;

2) control over the documentation of the Company's business transactions;

3) verification of the economic justification of transactions carried out in areas exposed to corruption risks.

12.5. Control over the documentation of the Company's business transactions is primarily associated with the obligation to maintain financial (accounting) records and is aimed at preventing and detecting such violations as maintaining unofficial records, using forged documents, recording fictitious expenses, absence of primary accounting documents, unauthorized amendments to documents and reports, and destruction of accounting documents before the expiry of the established retention period.

12.6. Verification of the economic justification of business transactions carried out in areas exposed to corruption risks shall apply to the exchange of business gifts, hospitality expenses, charitable donations, remuneration of external consultants, and other relevant areas. Particular attention shall be paid to circumstances indicating possible unlawful actions, including:

1) payment for services the nature of which is undefined or questionable;

2) provision of expensive gifts, payment for transportation or entertainment services, granting loans on preferential terms, or providing other valuables or benefits to external consultants, state authorities, local executive and representative bodies, employees of affiliated persons, and counterparties;

3) payment of remuneration to an intermediary or external consultant exceeding the customary fee for the organization or for the relevant type of service;

4) purchases or sales at prices significantly different from market prices;

5) suspicious cash payments.

12.7. The Company shall conduct regular internal audits of its financial and business activities, monitor the completeness and accuracy of accounting records, and ensure compliance with the requirements of legislation and the Company's internal (local) regulations and documents, including the principles and requirements of this Policy.

12.8. Monitoring of the Company's financial and business activities shall be carried out by independent audit organizations. The selection of an organization providing such services shall be conducted through the public procurement portal, except for educational organizations exempted under the public procurement legislation of the Republic of Kazakhstan.

13. Prevention and Settlement of Conflicts of Interest

13.1. Timely identification of conflicts of interest in the activities of the Company's employees is one of the key elements in preventing corruption offenses. The Company pays particular attention to preventing and resolving risks associated with conflicts of interest.

13.2. A conflict of interest at the University arises where the personal interest (direct or indirect) of a University employee affects or may affect the objective and impartial performance of their official duties and may cause harm to the rights and legitimate interests of the University, third parties, or the State.

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

13.3. In performing their duties, officials and employees shall act in the interests of the Company and avoid situations or circumstances in which their personal interests conflict with those of the Company. In the event of an actual or potential conflict of interest, officials and employees shall notify their immediate supervisor or higher management, as well as the Company's Anti-Corruption Compliance Service, in writing.

13.4. For the purpose of preventing and resolving conflicts of interest, the University's employees shall:

1) take measures to prevent any possibility of a conflict of interest arising at the University;

2) disclose information on an existing or potential conflict of interest as soon as they become aware of it, in accordance with the procedures established by the University;

3) minimize the risk of conflicts of interest in the performance of their official duties.

13.5. The prevention or settlement of a conflict of interest may include changing the official or employment position of the Company's employee who is a party to the conflict of interest, including their removal from the performance of official duties in accordance with the established procedure, and/or the employee's refusal of the benefit that gave rise to the conflict of interest.

13.6. The Company shall maintain records of affiliated persons in accordance with the legislation of the Republic of Kazakhstan and the Company's internal (local) regulations and documents.

14. General Rules on Gifts and Hospitality Expenses

14.1. Employees and students of the University are prohibited from offering, promising, giving, providing, requesting, soliciting, or accepting any gifts, business hospitality, or hospitality expenses where such actions or gifts:

1) have the direct or indirect purpose of influencing decision-making affecting the maintenance, expansion, or optimization of the University's activities or obtaining any advantage or benefit;

2) create a reputational or other risk for the University and its employees;

3) consist of cash or non-cash funds, securities, precious metals, or other forms or equivalents of monetary funds and/or luxury items;

4) are not reasonably justified in terms of their nature, value, and the specific circumstances.

14.2. It is prohibited to accept gifts or hospitality from any potential participant in procurement conducted by the University. If there is any doubt as to whether a business gift or event complies with the requirements of this Policy, the University employee shall consult their immediate supervisor and the Anti-Corruption Compliance

Service.

14.3. The Company recognizes the exchange of business gifts and the incurrence of hospitality expenses, including business hospitality, provided they are carried out in strict compliance with anti-corruption legislation and generally accepted business practice. The Company promotes an atmosphere of honesty and transparency with respect to business gifts and hospitality expenses.

14.4. The exchange of gifts with public officials and other persons shall not violate the requirements of the applicable legislation, this Policy, the Corporate Code of Ethics, or other internal (local) regulations and documents adopted by the Company for anti-corruption purposes.

14.5. The principles and rules governing the exchange of gifts by employees, the composition, procedure for documentation and reimbursement of hospitality expenses within the Company, the limits on hospitality expenses, and the list of officials authorized to incur such expenses shall be determined by this Policy and other internal (local) regulations and documents of the Company.

15. Participation in Charitable Activities and Sponsorship

15.1. The Company implements a unified regional policy aimed at establishing its image as a socially responsible partner. The Company does not finance charitable or sponsorship projects for the purpose of obtaining commercial advantages in specific projects.

15.2. The Company does not provide sponsorship, charitable, or financial assistance with the direct or indirect purpose of influencing decisions made by representatives of the State, organizations, or other persons that affect the maintenance, expansion, or optimization of its activities, or where such assistance may objectively be perceived as an attempt to exert such influence.

15.3. The Company may engage in charitable activities, sponsorship, and donations, provided that such activities do not contradict the legislation of the Republic of Kazakhstan and the types of activities established by the Company's Charter.

15.4. The activities specified in Clause 15.3 shall be carried out for the public benefit, including the support of science, culture, art, and other socially significant fields in which profit-making is not the primary purpose.

15.5. The University does not prohibit its employees from providing charitable and/or sponsorship assistance on their own behalf.

16. Anti-Corruption Restrictions

16.1. In order to prevent persons equated to persons authorized to perform public functions from committing actions that may result in the use of their powers for personal, group, or other non-official interests, they shall undertake the following anti-corruption restrictions:

1) prohibition of joint service (employment) of close relatives, spouses, and in-laws;

2) prohibition on the use of official and other information not subject to official disclosure for the purpose of obtaining or deriving property and non-property benefits and advantages;

3) prohibition on accepting material remuneration, gifts, or services in exchange for actions (or inaction) in favor of the persons providing them, where such actions fall within the official powers of persons equated to persons authorized to perform public functions, or where such persons, by virtue of their official position, may facilitate such actions (or inaction).

16.2. The consent of persons equated to persons authorized to perform public functions to accept anti-corruption restrictions shall be documented in writing by the University's human resources service in accordance with Appendix No.2.

16.3. Failure to accept anti-corruption restrictions shall result in refusal of appointment to a position or dismissal (removal from office). Failure to comply with such restrictions, where there are no elements of a criminal offense or administrative offense, shall constitute grounds for termination of public service or other relevant activity in accordance with the legislation of the Republic of Kazakhstan.

16.4. Family members of persons equated to persons authorized to perform public functions shall not receive material remuneration, gifts, or services provided in exchange for actions (or inaction) performed by such persons in favor of those providing the remuneration, gifts, or services, where such actions fall within the official powers of the relevant person or where, by virtue of their official position, they may facilitate such actions (or inaction).

16.5. Money transferred to the accounts of persons equated to persons authorized to perform public functions and/or their family members without their knowledge, as well as funds received by them, shall, within no more than two weeks after their discovery, be transferred to the republican budget together with an explanation submitted to the relevant state revenue authority regarding the circumstances under which such funds were received.

16.6. Gifts received without the knowledge of persons equated to persons authorized to perform public functions and/or their family members shall be transferred free of charge to the authorized state property management body within seven calendar days from the date of receipt of the gift or from the date on which the person became aware of its receipt. Services provided to such persons under the same circumstances shall be paid for by transferring the corresponding amount to the republican budget within seven calendar days from the date the service was provided or from the date on which the person became aware that the service had been provided.

16.7. A person who has transferred a gift to the authorized state property management body shall have the right, after notifying a superior official, to purchase the gift at the value determined in accordance with the Law of the Republic of Kazakhstan «On Valuation Activities in the Republic of Kazakhstan», on the basis of a sale and purchase agreement concluded with the authorized state property management body.

The proceeds from the sale of such gifts shall be transferred to the republican budget.

17. Human Resources Management

17.1. The University adheres to the principles of objectivity and fairness in making human resources decisions.

In order to eliminate corruption risks in the recruitment, performance evaluation, promotion, and dismissal of employees, the Company shall:

1) develop and approve, in accordance with the established procedure, transparent recruitment and selection procedures, as well as the relevant qualification requirements for each position;

2) conduct due diligence on employment candidates before deciding to establish or continue employment relationships, with a view to assessing their integrity and the absence of conflicts of interest;

3) evaluate employee performance and determine remuneration on the basis of key performance indicators and professional achievements;

4) make decisions on promotion to higher positions based on the employee's professional qualities and qualifications;

5) terminate employment relationships with employees on the grounds established by the legislation of the Republic of Kazakhstan.

17.2. The consent of persons equated to persons authorized to perform public functions to accept anti-corruption restrictions shall be documented by the structural subdivision responsible for the formation and implementation of the University's human resources policy (Human Resources Department) within no more than five working days from the date of appointment or employment, in accordance with Appendix No. 2.

17.3. If anti-corruption restrictions are not accepted, the relevant information shall be brought to the attention of the Chairman of the Management Board – Rector and the University's Board of Directors for appropriate action.

Failure to accept anti-corruption restrictions shall result in refusal of employment or dismissal.

17.4 . Failure by the Company's officials or employees to comply with anti-corruption restrictions, where their actions do not constitute a criminal or administrative offense, shall constitute grounds for termination of authority or dismissal in accordance with the applicable legislation of the Republic of Kazakhstan.

18. Anti-Corruption Measures in Relations with Counterparties and Other Persons and Organizations

18.1. The Company seeks to maintain business relations with counterparties that declare their non-acceptance of corruption and support the Company's Anti-Corruption Policy

18.2. The requirements of this Anti-Corruption Policy shall be taken into account when the University establishes contractual and other business relations with individuals and legal entities. The University expects counterparties, representatives of the University, governing bodies and employees, as well as other persons, to comply with the relevant anti-corruption obligations stipulated in the University's agreements with them or arising directly from the Law of the Republic of Kazakhstan "On Combating Corruption."

18.3. The Company declares its commitment to conducting transparent financial activities with counterparties and other persons and organizations and supports the principles of fair competition among potential suppliers, as well as openness and transparency in the procurement process.

18.4. The University makes reasonable efforts to minimize the risk of entering into business relations with counterparties that may be involved in corrupt activities.

In this regard, the authorized risk management personnel, the Public Procurement Department, and other relevant structural subdivisions of the University shall:

1) inform such counterparties of the principles and requirements in the field of combating corruption, including the existence of procedures and documents similar to this Policy;

2) take into account their willingness to comply with the principles and requirements in the field of combating corruption and to provide mutual assistance in preventing corruption;

3) monitor counterparties, third parties, and other persons and organizations with regard to any manifestations of corruption, their business reputation, and the absence of conflicts of interest;

4) conduct due diligence regarding integrity, sham entrepreneurship, the existence of tax and other liabilities, the source of funds, as well as the bank and jurisdiction from which funds derived from criminal activities are transferred, by submitting inquiries to the relevant authorized state authorities and organizations.

18.5. The Company and its employees are prohibited from engaging or using counterparties, intermediaries, partners, agents, or other persons to perform any actions that contradict the principles and requirements of this Policy or the provisions of anti-corruption legislation.

18.6. For the purpose of implementing the principles and requirements set forth in this Policy, the Company shall include anti-corruption provisions (clauses) in agreements with counterparties, partners, intermediaries, agents, and other persons. Such anti-corruption provisions (clauses) shall contain information on the Company's Anti-Corruption Policy and the system of anti-corruption procedures in force within the Company and shall establish the liability of such persons for failure to comply with the principles and requirements of this Policy (*Appendix No. 3*).

19. Cooperation in Combating Corruption

19.1. Cooperation with law enforcement agencies and authorized state bodies is an important indicator of the Company's genuine commitment to the anti-corruption standards of conduct it has declared.

19.2. The Company publicly undertakes to report to the relevant law enforcement agencies and authorized state bodies any corruption offenses of which the Company or its employees become aware.

19.3. The Company cooperates with law enforcement agencies and authorized state bodies in the field of combating corruption for the purpose of:

1) reporting violations that show signs of corruption;
2) assisting in the investigation of violations that show signs of corruption;
3) identifying persons involved in corrupt activities and establishing their whereabouts;
4) coordinating activities aimed at preventing manifestations of corruption;
5) identifying property obtained as a result of corrupt activities;
6) providing assistance to authorized representatives of supervisory, control, and law enforcement authorities in conducting inspections of the Company's activities related to the prevention of and combating corruption;
7) providing assistance to authorized representatives of law

enforcement authorities in carrying out measures to suppress and investigate corruption crimes, including operational-search activities.

20. Consultation and Training of the Company's Employees

20.1. When organizing training for the Company's employees on corruption prevention and combating corruption, the objectives and tasks of the training, the category of trainees, and the type of training, depending on the time of its delivery, shall be taken into account.

20.2. The objectives and tasks of the training determine its subject matter and format. Training may include, in particular, the following topics:

1) corruption in the public and quasi-public sectors (theoretical);

2) legal liability (criminal and administrative) for committing corruption offenses;

3) familiarization with the requirements of anti-corruption legislation and the Company's internal (local) regulations and documents on combating corruption, as well as the procedure for their application in the Company's activities (practical);

4) identification and settlement of conflicts of interest in the performance of employment duties (practical);

5) conduct in situations involving corruption risks, including cases of solicitation of bribes by officials of state and local authorities;

6) cooperation with law enforcement and special authorities on matters relating to corruption prevention and combating corruption (practical).

20.3. When organizing training, the category of trainees shall be taken into account. The following groups are generally distinguished: persons responsible for combating corruption at the University, managerial employees, other employees, and students. If it is not possible to form training groups within the University, training may be replaced by individual consultations or conducted jointly with other organizations by agreement.

20.4. Depending on the time of delivery, the following types of training may be distinguished:

1) training on corruption prevention and combating corruption immediately after employment;

2) training upon the appointment of an employee to another, higher position involving responsibilities related to corruption prevention and combating corruption;

3) periodic training of the University's employees to maintain their knowledge and skills in the field of combating corruption at an appropriate level;

4) additional training where deficiencies in the implementation of the Anti-Corruption Policy are identified and one of the reasons for such deficiencies is the insufficient knowledge and skills of employees in the field of combating corruption.

20.5. Consultation on matters relating to combating corruption shall be provided on an individual basis. For this purpose, the Company shall designate persons responsible for providing such consultations. Consultation on specific issues relating to combating corruption and the settlement of conflicts of interest is recommended to be conducted on a confidential basis.

21. Confidential Information

21.1. Employees of the Company, regardless of their position, shall comply with the requirements of the applicable legislation of the Republic of Kazakhstan and the Company's internal (local) regulations and documents adopted for the purpose of protecting information and ensuring information security in the course of the Company's activities.

21.2. Information with restricted access, including commercial information, official information, state secrets, personal data of the Company's employees and counterparties, and other information, shall not be disclosed. Such information may be used, disseminated, or transferred only by authorized persons who have access to such documents, solely for the purposes for which the information is intended and only within the time limits established for processing such information.

21.3. Restricted-access information referred to in Clause 21.2 of this Policy, if obtained by a person who is not authorized to access such information, shall not be subject to further disclosure. Its protection shall be ensured in accordance with the applicable legislation and the Company's internal (local) regulations and documents.

21.4. Failure to comply with the requirements for the protection of restricted-access information may result in liability established by the legislation of the Republic of Kazakhstan, including criminal, administrative, disciplinary, civil, or material liability.

22. Reporting Corruption Offenses and Internal Investigation of Corruption Offenses

22.1. Employees of the University shall notify their immediate supervisors and the University's Anti-Corruption Compliance Service of any attempts by any person to induce them to engage in corrupt practices.

22.2. If any employee becomes aware of, or has reason to suspect, possible corrupt actions (or omissions) by other employees, counterparties, or other persons interacting with the University, they shall report such information to their immediate supervisor and the University's Anti-Corruption Compliance Service.

22.3. The procedure and form of written notification upon the identification of a gift, hospitality expense, or hospitality that has been given, received, or is planned to be given or received are set out in Appendix No. 4 to this Policy.

22.4. Employees of the Company shall bear personal responsibility for corruption offenses committed in their interaction with public officials in accordance with the anti-corruption legislation of the Republic of Kazakhstan.

22.5. All reports of corruption offenses within the Company shall be subject to verification or an internal investigation involving representatives of the Anti-Corruption Compliance Service and the relevant structural subdivisions of the Company within a reasonable period of time.

22.6. If, as a result of the verification or internal investigation, corruption is established, the investigation shall be considered completed upon the adoption of corrective measures based on the principle of zero tolerance for all manifestations of corruption, including termination of employment and referral of the relevant materials to the competent state authorities for procedural action.

23. Responsibility of Employees and Students

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

23.2. Employees of the Company and students who commit corruption offenses, where their actions contain elements of an administrative or criminal offense, shall be held liable in accordance with the administrative and criminal legislation of the Republic of Kazakhstan, respectively.

23.3. Violation of the requirements of this Policy may be regarded as conduct incompatible with the status of an employee of the University and may serve as grounds for the imposition of disciplinary sanctions.

24. Final Provisions

24.1. This section establishes the procedure for the entry into force of the Anti-Corruption Policy, as well as the procedure for reviewing, amending, and supplementing its provisions.

24.2. This Anti-Corruption Policy shall enter into force on the date of its approval by the Company's Board of Directors.

24.3. The approved Anti-Corruption Policy shall be communicated to all employees of the Company, including newly employed personnel, and shall be mandatory for application in carrying out the Company's statutory activities.

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

24.5. This Policy may be reviewed and amended in the event of relevant amendments and additions to the legislation of the Republic of Kazakhstan and the Company's internal (local) regulations and documents.

Appendix No. 1
to the Company's
Anti-Corruption Policy

Acknowledgement of Familiarization with the Company's Anti-Corruption Policy

I, __________ ___ ___ (*Full Name*) hereby confirm that I have read the Anti-Corruption Policy of Shakarim University of Semey NJSC;

I undertake to strictly comply with the requirements established by the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy of Shakarim University of Semey NJSC;

I have been informed that, in the event of my violation of the anti-corruption legislation of the Republic of Kazakhstan or the Anti-Corruption Policy of Shakarim University of Semey NJSC, I may be subject to disciplinary or other liability in accordance with the legislation of the Republic of Kazakhstan.

The completed and signed acknowledgement form shall be kept in the personal file of the University employee from the date they commence their employment duties at the University.

____

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(*Date, Signature, Full Name, Position, Structural Subdivision*)

Appendix No. 2
to the Company's
Anti-Corruption Policy

Consent to Accept Anti-Corruption Restrictions

I, ____
____
____
____
(*Surname, First Name, Patronymic*)
____
____
____
____
(*Position, Structural Subdivision*)

in accordance with the anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy of Shakarim University of Semey NJSC, for the purpose of preventing actions that may result in the use of my powers for personal, group, or other non-official interests, hereby undertake the following anti-corruption restrictions:

1) not to engage in activities incompatible with the performance of public functions;

2) not to hold joint service (employment) with close relatives, spouses, or in-laws;

3) not to use official or other information not subject to official disclosure for the purpose of obtaining or deriving property or non-property benefits and advantages;

4) not to accept material remuneration, gifts, or services in exchange for actions (or inaction) in favor of the persons providing them where such actions fall within my official powers or where, by virtue of my official position, I may facilitate such actions (or inaction).

The completed and signed acknowledgement form shall be kept in the personal file of persons equated to persons authorized to perform public functions in the quasi-public sector from the date they commence their official duties at the University.

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(*Date, Signature, Full Name, Position, Structural Subdivision*)

Appendix No.3
to the Company's
Anti-Corruption Policy

Form and Content of the Anti-Corruption Clause

1. Shakarim University of Semey NJSC (hereinafter referred to as the Company or the University) informs the other Party to the Agreement of the principles and requirements of the Company's Anti-Corruption Policy. By entering into the Agreement, the other Party confirms that it has familiarized itself with the Company's Anti-Corruption Policy. In performing their obligations under the Agreement, the Parties undertake to comply with and ensure that their employees comply with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and shall not commit corruption offenses provided for by international instruments and the legislation of foreign states on combating corruption applicable to the purposes of the Agreement.

2. For the purposes of the Agreement, corruption offenses shall mean intentional acts committed through giving or receiving a bribe, commercial bribery, or any other unlawful use by an employee (employees) of the Parties of their official position contrary to the legitimate interests of the Parties for the purpose of obtaining benefits in the form of money, valuables, gifts, other property, property-related, physical or moral services, or other property rights for themselves or third parties, as well as the unlawful provision of such benefits by other individuals, and the receipt of other property benefits and advantages in accordance with the anti-corruption legislation of the Republic of Kazakhstan or the country in which the Party operates and/or conducts business (hereinafter referred to as corruption offenses).

3. If either Party has reasonable grounds to believe that a corruption offense has occurred or may occur (including upon receipt of information on the initiation of criminal proceedings against an employee (employees) of the other Party in connection with a corruption crime or other reliable information regarding a corruption offense), such Party shall notify the other Party thereof in writing, specifying the relevant facts (hereinafter referred to as the Notice), and

shall have the right to suspend performance of its obligations under the Agreement until confirmation is received from the other Party that the corruption offense has not occurred and cannot occur. Such confirmation shall be provided by the other Party within ten (10) calendar days from the date of receipt of the Notice.

4. Upon receipt of reliable information confirming the commission of a corruption offense and subject to compliance with the provisions of this Clause, the Company shall have the right to terminate the Agreement, in whole or in part, unilaterally by sending the appropriate written notice to the other Party, and to claim compensation from the other Party for losses incurred as a result of such termination.

Appendix No. 4
to the Company's
Anti-Corruption Policy

Written Notification Form
upon the identification of a gift, hospitality expense, or hospitality that has been given, received, or is planned to be given or received

I, ____
____

____
(*Full Name, Position, Structural Subdivision*)

hereby notify the identification of a [gift / hospitality expense / hospitality that has been given, received, or is planned to be given or received], namely:

1. Description of the gift / hospitality expense / hospitality:
2. Approximate value:
3. Information about the donor:
4. Information about the recipient:
5. Date:
6. Place:
7. Justification for giving/receiving the gift / hospitality expense / hospitality:
8. Other details:

I believe / have reason to believe that the above actions / gift / hospitality expense / hospitality:

1) have the direct or indirect purpose of selectively influencing the Company's decision-making in order to obtain an advantage or benefit for the donor where, without such actions, the likelihood of obtaining favorable consequences would be minimal;

2) do not comply with the applicable anti-corruption legislation of the Republic of Kazakhstan, this Anti-Corruption Policy, and/or the Company's internal regulations and documents;

3) create a reputational and/or other risk for the Company and/or

its employee if information about them is disclosed;

4) consist of cash or non-cash funds, securities, precious metals, or other forms or equivalents of monetary funds and/or luxury items, or other property benefits and advantages;

5) are not reasonably justified in terms of their nature, value, and the specific circumstances.

I believe / have reason to believe that the value of the gift / hospitality expense / hospitality received or planned to be received exceeds _______________ tenge.

____________ ____________________________

(*Date*) (*Full Name, Signature*)