

**NON-COMMERCIAL JOINT STOCK COMPANY
"S. SEIFULLIN KAZAKH AGROTECHNICAL RESEARCH UNIVERSITY"**

Approved

By the Board of Directors
Non-profit joint stock company
" Saken Seifullin Kazakh Agrotechnical
research university
Protocol № 3 "12 " V 2023

**Regulation
on Anti-Corruption Compliance Service
Non-profit joint stock company
Saken Seifullin Kazakh Agrotechnical Research University**

Astana-2023

Regulation on Anti-Corruption Compliance Service Non-profit Joint Stock Company " Saken Seifullin Kazakh Agrotechnical Research University"

1. This Regulation on the anti-corruption Compliance service of the Non-Profit Joint Stock Company "Saken Seifullin Kazakh Agrotechnical Research University" (hereinafter referred to as the Regulation) has been developed in accordance with Article 16 of the Law of the Republic of Kazakhstan "On Combating Corruption" and on the basis of a Model Regulation on anti-corruption compliance services in quasi-public sector entities, approved by the order of the Chairman of the Agency for anti-corruption of March 31, 2023 No. 112.

2. This Regulation defines the status, goals, tasks, functions and powers of the compliance service of the Non-profit Joint Stock Company "Saken Seifullin Kazakh Agrotechnical Research University".

Chapter 1. General provisions

1. The following basic concepts are used in this Regulation:

- 1) anti-corruption compliance - the function of ensuring compliance with the Saken Seifullin Kazakh Agrotechnical Research University and its employees with the legislation of the Republic of Kazakhstan on combating corruption;
- 2) internal analysis of corruption risks – identification and study of the causes and conditions that contribute to the commission of corruption offenses;
- 3) conflict of interests – a contradiction between the personal interests of persons equated to persons authorized to perform state functions and their official powers, in which the personal interests of these persons may lead to non-performance and (or) improper performance of their official duties;
- 4) a corruption offense is an unlawful guilty act (action or omission) that has signs of corruption, for which administrative or criminal liability is established by law;
- 5) corruption risk – the possibility of causes and conditions conducive to the commission of corruption offenses;
- 6) prevention of corruption – the activities of anti-corruption entities to study, identify, limit and eliminate the causes and conditions that contribute to the commission of corruption offenses by developing and implementing a system of preventive measures;
- 7) the authorized anti-corruption body is a state body responsible for the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption, as well as prevention, detection, suppression, disclosure and investigation of corruption offenses, and its territorial divisions.

2. Saken Seifullin Kazakh Agrotechnical Research University is creating a structural unit consisting of three full-time units - a head and two compliance officers, whose main task is to ensure that its employees comply with the

legislation of the Republic of Kazakhstan on combating corruption at the university.

3. The Anti-Corruption Compliance Service exercises its powers independently of the executive body, officials of the Saken Seifullin Kazakh Agrotechnical Research University, is accountable to the Board of Directors and is independent in ensuring compliance with the requirements of the legislation of the Republic of Kazakhstan on combating corruption.

4. Methodological and informational support of the anti-corruption compliance service is provided by the authorized anti-corruption body and its territorial divisions.

5. It is not allowed to combine the functions of the anti-corruption compliance service with the functions of other structural divisions of the Saken Seifullin Kazakh Agrotechnical Research University.

Chapter 2. Goals, objectives, principles, functions and powers of anti-corruption compliance services

1. The main purpose of the anti-corruption compliance service is to ensure compliance in the Saken Seifullin Kazakh Agrotechnical Research University and its employees with the legislation of the Republic of Kazakhstan on combating corruption, as well as monitoring the implementation of anti-corruption measures.

2. Tasks of the anti-corruption Compliance service:

- 1) ensuring the implementation of tools for the prevention and prevention of corruption offenses in the NJSC " Saken Seifullin Kazakh Agrotechnical Research University " and its employees;
- 2) effective implementation of the system of anti-corruption measures in the NJSC " Saken Seifullin Kazakh Agrotechnical Research University ";
- 3) ensuring the internal analysis of corruption risks at the Saken Seifullin Kazakh Agrotechnical Research University;
- 4) ensuring compliance with external regulatory requirements and best international practices on anti-corruption issues;
- 5) ensuring compliance with the basic principles of combating corruption in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption";

1. The Saken Seifullin Kazakh Agrotechnical Research University is guided by the following principles in the implementation and implementation of anti-corruption compliance functions:

- 1) the sufficiency of the powers and resources allocated to perform the functions of anti-corruption compliance;
- 2) management's interest in the effectiveness of anti-corruption compliance;

- 3) information openness of the activities of the anti-corruption compliance service;
- 4) independence of the anti-corruption compliance service;
- 5) continuity of anti-corruption compliance;
- 6) improving anti-corruption compliance;
- 7) continuous improvement of the competencies of specialists performing the functions of anti-corruption compliance.

Functions of the Anti-corruption Compliance Service:

1. ensures the development of internal documents, including:
 - internal anti-corruption policy of a quasi-public sector entity;
 - instructions on combating corruption for employees of a quasi-public sector entity;
 - internal policy of identifying and resolving conflicts of interest in quasi-public sector entities;
 - anti-corruption standard, in accordance with anti-corruption legislation;
 - internal action plan on anti-corruption issues;
 - a document regulating the procedure for informing employees of the quasi-public sector about facts or possible violations of anti-corruption legislation;
 - a document regulating issues of corporate ethics and conduct, and other documents of a quasi-public sector entity on anti-corruption compliance.

- 1) coordinates the internal analysis of corruption risks in the activities of the NJSC "Saken Seifullin Kazakh Agrotechnical Research University"

- 2) in accordance with the Standard Rules for Conducting Internal Analysis of Corruption Risks determined by the authorized

- 3) anti-corruption body;
- 2) participates in an external analysis of corruption risks in the activities of the Saken Seifullin Kazakh Agrotechnical Research University, conducted by a joint decision of the first heads of the authorized body Anti-Corruption and NJSC "Saken Seifullin Kazakh Agrotechnical Research University";
- 3) monitors the identified corruption risks in the NJSC "Saken Seifullin Kazakh Agrotechnical Research University" and the measures taken to mitigate and eliminate them;
- 4) conducts explanatory activities on anti-corruption issues and the formation of an anti-corruption culture at the Saken Seifullin Kazakh Agrotechnical Research University;
- 5) organizes anti-corruption training seminars for employees of the Saken Seifullin Kazakh Agrotechnical Research University;
- 6) ensures control over compliance by employees of the Saken Seifullin Kazakh Agrotechnical Research University with the anti-corruption policy and issues of corporate ethics and behavior;

- 7) promotes the formation of a culture of relationships corresponding to generally accepted moral and ethical standards in the team of the Saken Seifullin Kazakh Agrotechnical Research University;
- 8) ensures compliance by persons equated to persons authorized to perform state functions with financial control measures and anti-corruption restrictions established by the Law of the Republic of Kazakhstan "On Combating Corruption" within the competence of the anti-corruption compliance service;
- 9) develops and monitors the implementation by structural units of the Saken Seifullin Kazakh Agrotechnical Research University of the internal action plan on anti-corruption issues;
- 10) takes measures to identify, monitor and resolve conflicts of interest, including in matters of employment, procurement and business processes of "Saken Seifullin Kazakh Agrotechnical Research University ";
- 11) takes measures to resolve the issues of giving and receiving gifts at the Saken Seifullin Kazakh Agrotechnical Research University;
- 12) performs a comprehensive verification of the reliability of counterparties in accordance with the internal documents of the organization;
- 13) conducts internal inspections on the basis of appeals (complaints) about the facts of corruption in the NJSC "Saken Seifullin Kazakh Agrotechnical Research University" and/or participates in them in accordance with the documents defining the procedure for conducting inspections;
- 14) conducts monitoring and analysis of changes in anti-corruption legislation, judicial practice in cases related to corruption at the Saken Seifullin Kazakh Agrotechnical Research University;
- 15) assesses the effectiveness of the implementation of anti-corruption measures by structural units and employees of the Saken Seifullin Kazakh Agrotechnical Research University;
- 16) hears relevant information from structural divisions and employees of the Saken Seifullin Kazakh Agrotechnical Research University on anti-corruption issues;
- 17) makes recommendations to the Chairman-Board-Rector on eliminating identified corruption risks, improving the efficiency of internal processes of organizing the activities of the Saken Seifullin Kazakh Agrotechnical Research University;
- 18) depending on the specifics of the activity of JSC" Saken Seifullin Kazakh Agrotechnical Research University" performs other functions related to compliance, business ethics, sustainable development and others, provided that such functions do not affect independence and do not lead to a conflict of interests.
- 18) interacts with the authorized anti-corruption body and state bodies, quasi-public sector entities, public associations, as well as other individuals and legal entities;
- 19) carries out other activities in order to prevent corruption;

In accordance with the procedure established by law, the anti-corruption compliance service is competent in the following:

1) request and receive information and materials from the structural divisions of the Saken Seifullin Kazakh Agrotechnical Research University, including those constituting commercial and official secrets, within the approved procedures regulated by internal documents of the Saken Seifullin Kazakh Agrotechnical Research University;

2) initiate the submission of issues related to the competence of the compliance service for consideration by the board of directors;

3) initiate official inspections on incoming reports of possible corruption offenses

or violations of the legislation of the Republic of Kazakhstan on combating corruption;

4) require managers and other employees of the Saken Seifullin Kazakh Agrotechnical Research University to submit written explanations

within the framework of official investigations;

5) develop proposals to improve the anti-corruption legislation of the Republic of Kazakhstan and send

them to the authorized anti-corruption body;

6) participate in the development of draft internal documents

within its competence;

7) create information channels, a helpline 8(7172)380-370 to inform employees about the facts of the existence or potential possibility of violation of anti-corruption legislation of the Saken Seifullin Kazakh Agrotechnical Research University, or making proposals to increase the effectiveness of measures to combat corruption in the Saken Seifullin Kazakh Agrotechnical Research University;

8) other powers provided for by the legislation of the Republic of Kazakhstan.

In accordance with the procedure established by law, the anti-corruption compliance service must:

1) to respect the confidentiality of information on the Saken Seifullin Kazakh Agrotechnical Research University and its affiliated persons, insider information that became known during the implementation of anti-corruption compliance functions, if it does not contain data

on an upcoming and (or) committed corruption offense;

2) to ensure the confidentiality of persons who have applied for alleged or actual facts of corruption, violations of the corporate code of ethics and other internal documents

on anti-corruption issues at the Saken Seifullin Kazakh Agrotechnical Research University;

3) promptly inform the board of directors of any situations related to the presence or potential possibility of violation of anti-corruption legislation;

4) bring to the attention of the authorized anti-corruption body about the cases of corruption offenses that have become known, are being prepared, committed or committed;

5) not to interfere with the established mode of operation of the Saken Seifullin Kazakh Agrotechnical Research University

6) comply with the requirements of official and professional ethics;

7) perform other duties stipulated by the legislation of the Republic of Kazakhstan.

2. Employees of the anti-corruption compliance service should not:

1) participate in the inspections of the processes in which they participated during the previous three years;

2) participate in any activity that could damage the impartiality of the audit or be perceived as causing such damage;

3) use confidential information for personal interests or in any other way contrary to the legislation of the Republic of Kazakhstan and internal documents of the Saken Seifullin Kazakh Agrotechnical Research University;

4) violate the norms of business ethics;

5) accept gifts and use services, as a result of which the independence, objectivity

and impartiality of the anti-corruption compliance service may be damaged or which may be perceived as causing such damage;

6) take part in inspections, internal investigations and other activities that may lead to a conflict of interest.

Chapter 3. Organization of anti-corruption compliance services

3. By the decision of the Board of Directors, the head and employees of the anti-corruption compliance service are appointed according to the staffing table and their term of office, salary and other conditions of remuneration are determined.

15. The functional duties, rights and responsibilities of the head and employees of the anti-corruption compliance service are determined by job descriptions or other documents defining the employee's official rights and obligations, developed on the basis of the Regulations on Anti-Corruption Compliance Services and approved by the rector of the Saken Seifullin Kazakh Agrotechnical Research University ».

4. The selection criteria for the head and employees of the anti-corruption compliance service include:

1) no outstanding or uncollected criminal record;

2) the absence of an administrative penalty for committing an administrative corruption offense during the last

3 years old;

3) no criminal record for a corruption crime;

4) higher legal or economic education, or other higher education in the presence of work experience in the profile of the organization or related fields;

5) it is desirable to have certificates issued by professional organizations in the field of compliance, assuming the passing of a qualification exam;

6) It is desirable to have foreign professional certificates – ICA International Diploma in Governance Risk and Compliance, ICA Professional Postgraduate Diploma in Governance Risk and Compliance or analogical certificates;

7) it is desirable to have experience in the field of prevention and combating corruption;

8) it is desirable to have experience in the field of anti-corruption compliance in quasi-public sector entities or the implementation of functions provided for by this regulation;

9) it is desirable to have experience and skills in developing internal documents, standards, policies and procedures on compliance and ethics, as well as in carrying out activities to monitor business processes

within compliance procedures, investigations, reporting in the field of ethics and compliance, conducting investigations.

3. The Head of the anti-corruption compliance service ensures the fulfillment of the tasks assigned to the anti-corruption compliance service and the implementation of functions.

4. Documents and requests sent on behalf of the anti-corruption compliance service to other structural divisions of the Saken Seifullin Kazakh Agrotechnical Research University, departments and subordinate organizations on issues within the competence of the anti-corruption

compliance service are signed by the head of the anti-corruption compliance service.

5. Qualification requirements of employees of the anti-corruption compliance service are established by job descriptions or other documents approved by the Rector of the Saken Seifullin Kazakh Agrotechnical Research University on the recommendation of the head of the anti-corruption compliance service.

6. The provisions of the internal documents of the Saken Seifullin Kazakh Agrotechnical Research University apply to employees of the anti-corruption compliance service.

7. The head and employees of the anti-corruption compliance service must constantly improve their professional qualifications by participating in training events held by authorized bodies and professional organizations in the field of compliance.

8. The leadership of the NJSC " Saken Seifullin Kazakh Agrotechnical Research University " needs to:

1) to contribute to the creation of an effective environment for the implementation of the activities of the anti-corruption compliance service, to assist

in the fulfillment of its goals, tasks, functions and duties, in the exercise of rights;

2) provide administrative (organizational and technical) support for the activities of the anti-corruption compliance service, including providing the necessary capabilities, assets and resources for its activities, including information systems and applications (access to the necessary databases) and other goods, works, services;

3) in accordance with the established procedure, provide the head and employees of the anti-corruption compliance service with training

and certification opportunities on the activities of the anti-corruption compliance service, social and communication skills and competencies.

4. Interaction of the anti-corruption compliance service with the structural divisions of the NJSC "Kazakh Agrotechnical Research University named after Saken Seifullin" is built on the basis of mutual politeness and correctness in work.

Employees of structural divisions of NJSC " Saken Seifullin Kazakh Agrotechnical Research University " render assistance to the anti-corruption compliance service by:

1) providing documents and information necessary for the implementation of the tasks and functions of the anti-corruption compliance service, taking into account the features established by subparagraph 1) paragraph 14 of this regulation;

2) objective discussion of the identified risks and violations;

3) joint solution of emerging issues and problems.

Chapter 4. Reporting of anti-corruption compliance services

4. The Anti-Corruption Compliance Service sends quarterly information on the anti-corruption measures taken by the Saken Seifullin Kazakh Agrotechnical Research University to the authorized anti-corruption body.

At the request of the authorized anti-corruption body, it sends additional information on the anti-corruption measures taken to the Saken Seifullin Kazakh Agrotechnical Research University.

5. The Anti-Corruption Compliance Service periodically reports to the Board of Directors.

Chapter 5. Final provisions

4. If the current legislation, corporate governance practices, and international standards provide for other requirements and approaches that differ from these Regulations

For the organization of anti-corruption compliance, the Saken Seifullin Kazakh Agrotechnical Research University determines other requirements approved by the Board of Directors.

The Regulation on anti-corruption compliance services is posted on the official Internet resource of the Saken Seifullin Kazakh Agrotechnical Research University and it is brought to the attention of all employees.