NON-PROFIT JOINT STOCK COMPANY
"ABAI KAZAKH NATIONAL PEDAGOGICAL UNIVERSITY"

APPROVED
by decision of the Board of Directors NJSC "Abai Kazakh National Pedagogical University"
dated March 4, 2022
Protocol No.2
Chairman of the Board of Directors
G.I. Issimbaeva

REGULATION
on anti-corruption compliance service
non-profit joint stock company "Abai Kazakh National Pedagogical University"

Almaty, 2022

1. General Provisions

1. This Regulation determines the status, powers, goals, tasks, functions, rights, responsibilities and organization of the work of the anti-corruption compliance service (hereinafter referred to as the Compliance Service), issues of interaction with the Board of Directors of NJSC "Abai Kazakh National Pedagogical University" (hereinafter referred to as the University), the Management Board, structural subdivisions of the University, as well as issues of remuneration of employees of the Compliance Service.

The Compliance Service is an independent structural subdivision of the University that performs anti-corruption compliance in accordance with the legislation of the Republic of Kazakhstan on combating corruption and internal regulatory legal acts of the Company.

2. The Compliance Service in its activities is guided by the legislation of the Republic of Kazakhstan, the Charter of the University, these Regulations, and other internal documents of the University.

3. The Compliance Service is formed by the decision of the Board of Directors of the University.

4. The structure and staffing (quantity composition) of the anti-corruption compliance service are approved by the Board of Directors of the University.

5. Employment contracts with employees of the Compliance Service are concluded by the Chairman of the Management Board of the University based on the decision of the Board of Directors of the University in accordance with the labor legislation of the Republic of Kazakhstan.

6. Employees of the Compliance Service cannot be elected to the Board of Directors and the Management Board of the University.

7. The compliance service carries out its activities in accordance with the work plan of the service for the corresponding academic year, approved by the Board of Directors of the University.

8. The functional duties, rights and responsibilities of employees of the anti-corruption compliance service are determined by the relevant job descriptions, which are developed on the basis of these Regulations on the anti-corruption compliance service of the University and approved by the Chairman of the Management Board - the Rector of the University. The corresponding act on the anti-corruption compliance service is posted on the official Internet resource of the University and brought to the attention of all employees of the organization.

9. For the purpose of proper and efficient performance by employees of the Compliance Service of the duties assigned to them, the Management Board of the University creates appropriate working conditions.

10. The following terms are used in this Regulation:

1) антикоррупционный anti-corruption compliance – a function to ensure compliance by the University and its employees with the legislation of the Republic of Kazakhstan in the field of combating corruption, assigned to the compliance service of the University;

2) entities of the quasi-public sector - state-owned enterprises, limited liability partnerships, joint-stock companies, including national management holdings, national holdings, national companies, the founder, participant or shareholder of which is the

state, as well as subsidiaries, dependent and other legal entities affiliated with them in accordance with the legislative acts of the Republic of Kazakhstan;

3) conflict of interest - a contradiction between the personal interests of persons holding a responsible public position, persons authorized to perform state functions, persons equated to them, officials and their official powers, in which the personal interests of these persons may lead to non-performance and (or) improper the performance of their official duties;

4) corruption offense - an unlawful guilty act (action or inaction) that has signs of corruption, for which administrative or criminal liability is established by law;

5) corruption risk - the possibility of occurrence 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.

2. Compliance service status

11. The Compliance Service is a division of the University, independent of other structural divisions, subordinate and accountable to the Board of Directors of the University.

12. The Compliance Service is independent in the adoption and implementation of anti-corruption measures in the University.

13. The Compliance Service cannot be involved in work falling within the competence of other structural divisions of the University, as well as in the preparation or execution of programs and projects that are not related to its authority.

14. The employees of the compliance service are subject to the provisions of the internal regulatory documentation of the University.

3. Goals, objectives, principles, functions, rights and obligations compliance services

15. The main purpose of the anti-corruption compliance service is to ensure compliance by the 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.

16. Tasks of the anti-corruption compliance service:

1) ensuring compliance with external regulatory requirements and best international practices on combating corruption;

2) ensuring compliance with the basic principles of combating corruption in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" (hereinafter referred to as the Law);

3) identification and assessment of corruption risks;

4) effective implementation of the system of measures to combat corruption in accordance with the Law;

17. The Anti-Corruption Compliance Service is guided by the following principles:

1) sufficiency of powers and resources necessary to perform the tasks of the anti-corruption compliance service;

2) independence of the anti-corruption compliance service;

3) information openness of the activities of the anti-corruption compliance service;

4) continuity of implementation of anti-corruption compliance in the Company;

5) improvement of anti-corruption compliance.

18. Functions of the anti-corruption compliance service:

1) develops an internal anti-corruption policy of the University;

2) develop instructions for combating corruption for the employees of the University, taking into account the specifics of the organization's activities;

3) conducts explanatory activities on the issues of combating corruption and the formation of an anti-corruption culture in the University;

4) promotes corporate ethical values;

5) ensures control over compliance by the University's employees with anti-corruption legislation, as well as the corporate code of ethics;

6) organizes training of the University's employees on anti-corruption issues;

7) develops and monitors the implementation by structural units of the internal anti-corruption program in the activities of the organization and employees;

8) coordinates the work on the internal analysis of corruption risks in the activities of the University in accordance with the order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 No. 12 "On approval of the Model Rules for conducting an internal analysis of corruption risks" with the involvement of representatives of civil and business communities;

9) participates in an external analysis of corruption risks in the activities of the University, carried out by a joint decision of the first heads of the authorized body for combating corruption and the University;

10) manages corruption risks in the University;

11) takes measures to identify, monitor and resolve conflicts of interest, including in matters of employment;

12) take measures to regulate the issues of gifts and entertainment expenses in the Company;

13) checks counterparties in financial transactions;

14) conducts internal audits based on applications (complaints) about facts of corruption in the University and/or participates in them;

15) monitors compliance by the University's employees belonging to the category of persons equated to persons authorized to perform state functions, anti-corruption restrictions in accordance with the Law;

16) monitors and analyzes changes in anti-corruption legislation, judicial practice in cases related to corruption in the University;

17) evaluates the effectiveness of the implementation of anti-corruption measures by structural divisions and employees of the University;

18) hear relevant information from the University's structural subdivisions and employees on anti-corruption issues;

19) makes recommendations to the head of the Society to eliminate identified corruption risks, improve the efficiency of internal processes for organizing the activities of the university;

19. Rights of the anti-corruption compliance service:

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

2) initiate the submission of issues related to their competence for consideration by the Board of Directors, the management body of the University;

3) initiate internal audits 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 University to submit written explanations within the framework of internal investigations;

5) develop proposals for improving the anti-corruption legislation of the Republic of Kazakhstan and submit them for consideration by the authorized body for combating corruption;

6) participate in the development of draft internal regulatory documents within their competence;

7) provide consulting assistance in the work on combating corruption in the University;

8) create information channels through which messages can be received about the presence or potential violation of anti-corruption laws in the University, or make proposals to improve the effectiveness of anti-corruption measures.

20. Duties of the anti-corruption compliance service:

1) maintains the confidentiality of information about the University and its affiliates, insider information that became known during the performance of the functions of the anti-corruption compliance service, if it does not contain data on an impending corruption offense;

2) ensures the confidentiality of persons who applied on alleged or actual facts of corruption, violations of the corporate code of ethics and other internal policies and procedures on anti-corruption compliance;

3) promptly inform the Board of Directors of the University about any situations related to the presence or potential possibility of violation of anti-corruption legislation;

4) in cases of revealing signs of criminal or administrative corruption offenses in the actions of the University's employees, submit materials with relevant evidence to the Board of Directors, as well as to the Chairman of the Management Board – the Rector for further forwarding to the authorized anti-corruption body;

5) does not interfere with the established mode of operation of the University;

6) comply with the requirements of service and professional ethics.

21. The compliance service ensures the timely and high-quality performance of the functions and tasks assigned to it.

4. Compliance service reporting

22. Methodological and informational support to the compliance service is provided by the authorized body for combating corruption, the Department of the Agency of the Republic of Kazakhstan for combating corruption in Almaty.

23. The Compliance Service quarterly sends reports and information on the anti-corruption measures taken to the Board of Directors of the University and the authorized

body for combating corruption, with the simultaneous sending of a copy of the report to the Management Board of the University.

24. The compliance service reports to the Board of Directors of the University 2 times a year (semi-annual report, annual report).

25. The University is recommended to keep its contractors, business partners, civil society institutions informed about the measures taken to prevent corruption on an ongoing basis.

5. Election procedure and qualification requirements

26. The election (appointment) of the head and compliance officer of the anti-corruption compliance service is carried out through an open competition (hereinafter referred to as the competition) and includes the following stages:

publication of the announcement of the competition;

acceptance of documents of persons applying for the positions of head and compliance officer of the anti-corruption compliance service;

checking for compliance with the qualification requirements of persons who submitted documents for participation in the competition;

consideration of candidates applying for the positions of head and compliance officer of the anti-corruption compliance service at a meeting of the Board of Directors;

27. The announcement of the competition for the positions of the head and compliance officer of the anti-corruption compliance service is published on the university website and / or other Internet resources.

28. Everyone who meets the qualification requirements provided for in these Regulations can take part in the competition.

29. Acceptance of documents of candidates is carried out within 10 calendar days from the date of publication of the announcement of the competition.

30. To participate in the competition, the Corporate Secretary shall be provided with the following documents on paper and/or electronic media:

1) application;

2) a copy of the identity document of the tender participant;

3) summary;

4) copies of documents on education and annexes to them;

5) a copy of the document confirming labor activity, certified by the personnel department at the place (current or last) of work;

6) certificate of the presence or absence of a criminal record;

7) presentation of vision for the further activities of the compliance service (only for the head and compliance officer).

31. If less than two candidates for each position of the head and compliance officer of the anti-corruption compliance service who meet the requirements established by these Regulations are submitted for consideration by the Board of Directors, the Board of Directors recognizes the competition as invalid and decides to hold a second competition.

32. Corporate Secretary:

1) ensure the publication of the announcement of the competition;

2) accepts documents of persons applying for the positions of the head and compliance officer of the anti-corruption compliance service;

3) checks compliance with qualification requirements;

3) ensures the holding of a meeting of the Board of Directors to review the documents of persons admitted to participate in the tender.

33. The HR, Remuneration and Social Affairs Committee reviews the documents of candidates for compliance with qualification requirements, and at its meeting conducts an interview with them.

34. Based on the results of consideration of candidates, the Board of Directors at its meeting decides on the election of the head and compliance officer of the anti-corruption compliance service, their term of office, and the amount of their salary.

35. Based on the positive decision of the Board of Directors, the Chairman of the Board – Rector issues an order to appoint the head and compliance officer of the anti-corruption compliance service and concludes employment contracts with them.

36. A person with a higher education, with at least 7 years of experience in senior positions in law enforcement and / or government agencies, is appointed to the position of the head of the compliance service.

The head of the compliance service must know: the Constitution of the Republic of Kazakhstan; Laws of the Republic of Kazakhstan: "On Education", "On Science", "On Licensing", "On State Youth Policy in the Republic of Kazakhstan", "On Combating Corruption", "On Languages in the Republic of Kazakhstan", the State Education Development Program for 2020- 2025, regulatory legal acts of the Republic of Kazakhstan regulating educational activities, the procedure for concluding collective agreements and regulating social and labor relations; labor legislation, rules and regulations of labor protection, safety and fire protection, the policy and goals of the University in the field of quality, documents of the quality management system; anti-corruption management system, anti-corruption policy, conflict of interest resolution policy and other internal anti-corruption regulations.

37. A person with a higher education, with at least 5 years of experience in senior positions in law enforcement and / or government agencies, is appointed to the position of compliance officer of the compliance service.

The compliance-officer of the compliance service must know the Constitution of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan “On Combating Corruption”, “On Education”, “On Science”, “On Permits and Notifications”, “On State Youth Policy in the Republic of Kazakhstan”, “On Access to information”, “On the procedure for considering applications from individuals and legal entities”, “On languages in the Republic of Kazakhstan”, regulatory legal acts of the Republic of Kazakhstan regulating educational activities, the procedure for concluding collective agreements and regulating social and labor relations; labor legislation, rules and norms of labor protection, policy and goals of the University in the field of quality; labor and civil legislation, anti-corruption management system, anti-corruption policy, conflict of interest resolution policy and other internal anti-corruption regulations.

38. A person with a higher education with at least 3 years of work experience in educational organizations is appointed to the position of a compliance service specialist.

The compliance service specialist must know the Constitution of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan “On Combating Corruption”, “On Education”, “On Permits and Notifications”, “On Access to Information”, “On the

Procedure for Considering Appeals from Individuals and Legal Entities", " On languages in the Republic of Kazakhstan", normative legal acts of the Republic of Kazakhstan regulating educational activities; labor legislation, rules and norms of labor protection, policy and goals of the University in the field of quality; labor and civil legislation, anti-corruption management system, anti-corruption policy, conflict of interest resolution policy and other internal anti-corruption regulations.

6. Powers of the head of the compliance service

39. The powers of the head of the compliance service include:

planning activities and organizing the work of the compliance service, ensuring the preparation of a work plan for the compliance service for the corresponding academic year and monitoring its implementation;

ensuring the development of documents regulating the activities of the compliance service, including methodological recommendations for internal analysis and other documents related to the activities of the compliance service;

ensuring timely submission of reports on the activities of the compliance service to the Board of Directors of the University;

periodic assessment of the relevance of the tasks and functions of the Service to achieve its goals (at least once a year);

making proposals on determining the quantitative composition, staffing, term of office of the compliance service, appointment of employees of the service, as well as early termination of their powers, the procedure for the work of the compliance service, the amount and conditions of remuneration and bonuses to employees, imposing disciplinary sanctions on employees of the compliance service, organizational -technical support of the compliance service;

taking measures to improve the level of professional training of employees of the compliance service;

initiating the convening of a meeting of the Board of Directors of the University on issues within the competence of the compliance service;

making decisions on all issues within the competence of the compliance service.

40. The head of the compliance service has the right to be present at the General Meeting of Shareholders on issues previously considered by the compliance service, at meetings of the Board of Directors at which the issues of the compliance service are considered, to propose issues for inclusion in the agenda of the meeting of the Board of Directors, to submit for consideration by the Board of Directors candidates for inclusion in the composition of employees of the compliance service.

7. Remuneration of employees of the compliance service

41. The amount of remuneration and bonuses based on the results of the assessment of the activities of employees of the compliance service are determined by the Board of Directors of the University.

42. Social support, additional payments, compensation payments, bonuses in honor of the celebration of national, state and professional holidays in the Republic of Kazakhstan of employees of the compliance service are determined in accordance with the Regulations

on remuneration, incentives and social support for employees of NJSC "Abai Kazakh National Pedagogical University".

43. The system of remuneration for employees of the compliance service may be reviewed by the Board of Directors of the University based on the results of monitoring the achievement by the University of the approved goals.

8. Interaction of the Service with the Board

44. The relationship of the compliance service with the Management Board should be based on the principle of independence, since the level of organizational and functional independence of the compliance service has a direct impact on the objectivity of the compliance service employees.

45. As part of interaction with the Management Board, the Compliance Service quarterly submits to the Management Board of the University information on the execution by the University's divisions of the points of the Work Plan for the corresponding academic year;

46. The Management Board of the University, in accordance with the established procedure, must provide administrative, organizational and technical support for the compliance service.

47. Intervention of the Board of the University in the activities of the compliance service is not allowed.

9. Compliance Service Responsibility

48. The compliance service is responsible for the timely and high-quality performance of the functions and tasks assigned to it.

49. The head and employees of the compliance service, in accordance with the established procedure, are personally responsible for the quality and timeliness of the performance of the functions and tasks assigned to the service, in accordance with this Regulation, the legislation of the Republic of Kazakhstan, labor contracts and job descriptions.

50. For violation of labor discipline, failure to perform or improper performance of assigned labor duties, by decision of the Board of Directors of the University, disciplinary sanctions are applied to the head and employees of the compliance service in the prescribed manner.

51. Liability of the head and employees of the compliance service and the procedure for compensation for the harm caused by them (if any) are determined in accordance with the legislation of the Republic of Kazakhstan.

10. Final provisions

52. Changes and additions to these Regulations may be made by the decision of the Board of Directors of the University in the prescribed manner.