APPROVED
President of
JSC «KazUTB named after K. Kulazhanov»
_____E.T. Kulazhanov
«10» september 2026

POLICY
SUSTAINABLE FUNDING AND DONATIONS
JSC «KAZUTB NAMED AFTER K. KULAZHANOV»
KazUTB- DSD-7.1.1-2026-20

AGREED
Rector of
JSC «KazUTB named after K. Kulazhanov»
_____L.K. Baibolova
«10» september 2026

Astana, 2026

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1. PURPOSE

1.1 This Policy establishes the principles, requirements and mechanisms for attracting, accepting, managing, allocating and reporting on financial resources and donations at JSC "Kazakh University of Technology and Business named after K. Kulazhanov" (KazUTB) in accordance with sustainable development, integrity and quality management principles.

1.2 The Policy aims to:

- ensure long-term financial sustainability and resilience;
- diversify funding sources and reduce undue dependence on any single source;
- integrate ESG principles and the UN Sustainable Development Goals (SDGs) into funding decisions;
- support educational, research, innovation and socially impactful initiatives;
- protect academic freedom, institutional autonomy and research integrity;
- prevent corruption, conflicts of interest, money laundering, reputational exposure and other integrity risks;
- ensure transparency, accountability, traceability and continual improvement.

2. SCOPE

2.1 This Policy applies to all structural units, employees and responsible persons involved in fundraising, grant applications, donor relations, sponsorship, financial management, acceptance or use of donations and reporting.

2.2 It also applies, to the extent relevant to their activities and contractual relationships, to donors, sponsors, partners, grantors and other external organizations providing resources to the University.

3. DEFINITIONS

Sustainable funding - financial resources that support long-term institutional sustainability and align with strategic priorities, ESG principles and applicable requirements.

Donation - a voluntary financial or non-financial contribution provided without an unlawful or inappropriate expectation of personal, academic or administrative benefit.

In-kind contribution - a non-monetary contribution such as equipment, software, materials, services, facilities or other assets.

Endowment - a long-term financial instrument formed from contributions and managed to generate sustainable income for approved University purposes.

Donor due diligence - a documented assessment of the donor, funding source, purpose, conditions and associated legal, financial, reputational and integrity risks before acceptance.

Conflict of interest - a situation in which a private, financial, family, professional or other interest may improperly influence, or appear to influence, objective performance of University duties.

4. PRINCIPLES

Funding and donations are governed by the following principles:

4.1 Sustainability — preference for funding that strengthens long-term institutional capacity and positive environmental and social impact.

4.2 Transparency — openness and traceability in the attraction, acceptance, allocation and use of funds, subject to legitimate confidentiality requirements.

4.3 Accountability — responsible, efficient and documented use of resources for approved purposes.

4.4 Integrity and ethical compliance — zero tolerance for bribery, corruption, fraud, improper influence and other unlawful or unethical conduct.

4.5 Independence — donor support shall not compromise academic freedom, research integrity, admissions, assessment, employment decisions or other core University functions.

4.6 Fairness and non-discrimination — funding decisions shall be based on objective criteria and shall not create unjustified privileges.

4.7 Risk-based approach — financial, legal, operational, reputational, ESG and conflict-of-interest risks shall be assessed proportionately.

4.8 Alignment with strategy and SDGs — funding should contribute, where relevant, to strategic priorities and sustainable development objectives.

5. SOURCES OF FUNDING

The University may receive funding from lawful and appropriately verified sources, including:

- public funding;
- research grants and project funding;
- corporate and institutional partnerships;
- philanthropic donations and charitable contributions;
- international programmes and development initiatives;
- endowment and planned giving mechanisms, when established;
- internal revenue-generating activities;
- other lawful sources approved under University governance requirements.

6. DONATION AND FUNDING ACCEPTANCE

6.1 Acceptance criteria

Donations and external funding may be accepted when they:

- are consistent with the University's mission, strategic priorities and internal policies;
- originate from lawful and ethically acceptable sources;
- have a clear purpose and conditions of use;
- do not create an unmanaged actual, potential or perceived conflict of interest;
- do not impose inappropriate restrictions on academic, research, management or operational independence;
- comply with ESG, integrity, financial-control and contractual requirements;
- have undergone proportionate due diligence.

6.2 Restrictions

The University shall not accept funding or donations that:

- violate applicable legislation or binding University requirements;
- involve bribery, corruption, fraud, proceeds of crime or other unlawful activity;
- conceal the true source, beneficiary or purpose of funds;
- create unacceptable legal, financial, operational, reputational or ESG risks;
- compromise academic freedom, research integrity or objective decision-making;
- require preferential treatment inconsistent with University rules;
- contain conditions that cannot be transparently documented, monitored or fulfilled.

7. DONOR DUE DILIGENCE AND INTEGRITY CONTROLS

7.1 Before accepting material, higher-risk or conditionally restricted funding, the responsible unit shall conduct and document proportionate due diligence covering, as applicable:

- donor identity and legal status;
- source and legitimacy of funds or assets;
- beneficial ownership or controlling interests where relevant;
- purpose, restrictions and expected deliverables;
- sanctions, legal, regulatory, litigation and adverse-reputation considerations, where relevant;
- conflicts of interest involving University personnel;
- ESG, human-rights, environmental and social risks;
- risks to academic independence and institutional reputation.

Where significant integrity or compliance concerns are identified, acceptance shall be escalated to the competent University authority.

8. MANAGEMENT, ALLOCATION AND USE OF FUNDS

Funds shall be recorded and allocated in accordance with approved budgets, agreements and University priorities.

Restricted donations shall be used only for agreed purposes.

Financial transactions shall follow authorization, accounting, segregation-of-duties and internal control requirements.

In-kind contributions shall be assessed, documented, accepted and accounted for under applicable procedures.

Funding shall not be used for improper personal benefit or preferential treatment.

Where practical, priority should be given to initiatives with durable educational, research, social, environmental or institutional value.

Material deviations from an approved funding purpose require documented authorization.

9. TRANSPARENCY, MONITORING AND REPORTING

The University shall maintain appropriate records of material funding and donations and monitor their use and effectiveness.

Depending on the nature and risk of the funding, monitoring may include:

- financial and narrative reporting;
- verification of expenditure and intended outcomes;
- review of compliance with donor conditions;
- monitoring of conflicts of interest and integrity risks;
- assessment of ESG and social-impact indicators where relevant;
- provision of appropriate information to authorized stakeholders while protecting confidential or legally restricted information.

Key process indicators may include funding diversification, documented due diligence coverage, compliance with donor conditions, reporting timeliness, identified conflicts of interest and corrective actions.

10. ENDOWMENT AND LONG-TERM FUNDING DEVELOPMENT

The University recognizes the strategic importance of sustainable long-term financing mechanisms, including an endowment, planned giving and other appropriate instruments.

As part of institutional development, the University may:

- develop an endowment model and governance framework;
- establish fundraising and donor-engagement mechanisms;
- define priority areas for the use of generated income;
- establish investment, risk and reporting controls;
- ensure that long-term funding arrangements remain consistent with integrity, transparency, sustainability and institutional independence.

Upon establishment, an endowment shall operate in accordance with applicable legislation, approved internal financial governance documents and this Policy.

11. GOVERNANCE AND RESPONSIBILITIES

11. University Management: strategic oversight of sustainable funding, donor relations and financial resilience; approval or escalation of material or high-risk funding decisions within delegated authority.

Strategic Development Department (DSR): coordination of Policy implementation and integration with strategic priorities and the QMS; support for funding diversification, monitoring and continual improvement.

Finance Department: financial accounting, controls, budgeting, reporting and financial monitoring.

Research / Project Office or responsible research units: management of grants and project-based funding in accordance with approved agreements and requirements.

Employees and responsible persons: disclosure of relevant conflicts of interest; compliance with this Policy; reporting of suspected fraud, corruption, improper influence or other integrity concerns through established channels.

12. RISK MANAGEMENT AND INCIDENT RESPONSE

Funding processes shall apply a risk-based approach covering financial, legal, compliance, operational, reputational, ESG, information and academic-independence risks, as relevant.

Identified risks shall be assessed, treated and monitored through the University's risk-management and QMS processes.

Suspected violations, conflicts of interest, misuse of funds and integrity incidents shall be documented, investigated and addressed by competent persons. Corrective and preventive actions shall be implemented where required.

13. CONTINUOUS IMPROVEMENT

This Policy shall be reviewed periodically and when significant changes occur in legislation, the University's strategy, funding mechanisms or risk environment.

Improvement activities may include benchmarking, stakeholder feedback, internal audits, analysis of incidents and corrective actions, KPI review, adoption of relevant international practices and enhancement of fundraising and control mechanisms.

14. FINAL PROVISIONS

This Policy is approved by the authorized University management and enters into force from the date specified in the approval document.

All structural units and responsible persons shall ensure compliance with this Policy within their areas of responsibility.

F. DSD - 7.5 – 2026 – 01 - 02 (mandatory)

APPROVAL SHEET

Position	Full name	Date	Signature
Vice-Rector for AA	Askarbekov E.B.	08.09.2026	
Vice-Rector for R&I	Aibuldinov Y.K.	09.09.2026	
Vice-Rector for SA&SD	Berdigaliuly S.	08.09.2026	
Director of the DSD	Orazalina D. K.	08.09.2026	
Head of the QSMD	Ernst A.	09.09.2026	

F. DSD - 7.5 – 2026 – 01 - 03 (mandatory)

FAMILIARIZATION SHEET

Position	Full name	Date	Signature

F. DSD - 7.5 – 2026 – 01 - 04 (mandatory)

CHANGE REGISTRATION SHEET

Change Number	Change Notice Number	Number of sheets (pages)				Total sheets (after changes)	Date of entry	Full name of the person making the changes	Signature of the person who made the changes
		modified	replaced	new	cancelled				

F. DSD - 7.5 – 2026 – 01 - 05 (mandatory)

PERIODIC INSPECTION RECORD SHEET

Verification Date	full name of the person, who performed the check	Signature who performed the Verification	Formulation Comments