	JSC «Kazakh University of Technology and Business named after K. Kulazhanov»
	QUALITY MANAGEMENT SYSTEM
	POLICY

APPROVED
President of
JSC «KazUTB named after K. Kulazhanov»
____________E.T. Kulazhanov

POLICY
ANTI-CORRUPTION AND ANTI-BRIBERY
JSC «KAZUTB NAMED AFTER K. KULAZHANOV»
KazUTB-DSD-4.1-2026-07

AGREED
Rector of
JSC «KazUTB named after K. Kulazhanov»
______________L.K. Baibolova

Astana, 2026

Version: 1.0	**CI: ______________**	**Regisration №_________ on EDM**

CONTENTS

1. TERMS AND DEFINITIONS

The term	Definition
"KazTBU named after K. Kulazhanov" JSC	Kazakh University of Technology and Business named after K. Kulazhanov Joint-Stock Company
Bribe	offering, promising, giving, accepting or soliciting an undue advantage of any value (whether financial or non-financial), directly or indirectly, and regardless of the place(s) in violation of applicable law, as an incentive or reward to a person acting or refraining from acting in relation to the performance of that person's duties
U&SW	Upbringing and social work
Bribery	offering, promising, giving, accepting, or soliciting improper benefit of any kind (financial or non-financial).
Declaration	Declaration of Compliance with Anti-Corruption Policy
DSD	Department of Strategic Development
Property benefits	things, money, including foreign currency, financial instruments, works, services, objectified results of creative intellectual activity, trade names, trademarks and other means of individualization of products, property rights and other property
Conflict of interest	a situation in which the employee's personal interest affects or may affect the proper performance of his/her job duties.
Counterparty	an individual or legal entity (company, individual entrepreneur, bank, government agency) acting as one of the parties to an agreement or transaction.
Corruption	illegal use by persons of their official powers and related opportunities in order to obtain or derive, personally or through intermediaries, property (non-property) benefits and advantages.
Corruption risk	the combination of the likelihood and seriousness of the consequences of offering, promising, providing, accepting or begging for an undue advantage in any form (whether financial or non-financial), directly or indirectly, regardless of location, in violation of applicable law, as an inducement or reward to a person acting or refraining from acting in the activities for which he is responsible
Corruption danger	circumstances or activities that are potentially can lead to a corruption case
Corruption case	a single fact of corruption or bribery
Corruption incident	an event that arises as a relationship between people, when One of the subjects of these relations initiates the receipt of unjustified advantage in the form of a bribe
Corruption	a documented event that has the composition of corruption or bribery
Personal non-property benefits	life, health, dignity of a person, honor, good name, business reputation, inviolability of private life, personal and family secrets,

	the right to a name, the right to authorship, the right to inviolability of the work and other intangible benefits and rights
Zero tolerance	the position of the University, which excludes any compromise in relation to corrupt actions: any violation entails a mandatory investigation and responsibility.
S&I	Science and Innovation
CaLSO	Compliance and Legal Support Office
HRD	Human Resources Department
Anti-Corruption Policy	Legal, administrative and organizational measures aimed at reducing corruption risks, forming an anti-corruption culture, increasing public confidence in the activities of «KazTBU named after K. Kulazhanov» JSC.
Family	the circle of persons bound by property and personal non-property rights and obligations arising from marriage (matrimony), kinship, property, adoption or other form of adoption of children and designed to contribute to the strengthening and development of family relations
Quality Management System (QMS)	A management system for the management and management of an organization in relation to quality.
Anti-Corruption Management System (ACMS)	A set of interrelated or interacting elements of «KazTBU named after K. Kulazhanov» JSC for the development of policies and objectives, as well as well as anti-corruption and anti-bribery processes.
Information Security Management Systems (ISMS)	Information Security Management System
SD	Structural Department
GWS	Goods, works, services

2. GENERAL PROVISIONS AND DESCRIPTION OF THE PROCEDURE

2.1 This Anti-Corruption and Anti-Bribery Policy (hereinafter referred to as the Policy) is a fundamental internal regulatory document of JSC "Kazakh University of Technology and Business named after K. Kulazhanov".

2.2 This Policy sets out the requirements, provides guidance on the creation, implementation, maintenance, analysis and improvement of the anti-bribery management system.

2.3 This Policy defines the key principles, requirements and measures aimed at preventing corruption, minimizing the risks of corruption offenses and forming a corporate culture of integrity.

2.4 This Policy establishes mandatory requirements and creates the basis for the functioning of the entire management system of KazTBU named after K. Kulazhanov JSC

2.5 The requirements of this Policy apply to all employees of the University, regardless of their position, form of employment and term of office (including management, faculty and administrative staff).

2.6 This Policy also conveys the expectations of the University to business partners, counterparties and students in terms of compliance with anti-corruption standards.

2.7 This Policy is subject to mandatory review at least once every three years, as well as in case of changes in the legislation of the Republic of Kazakhstan or the organizational structure of the University.

2.8 Control over compliance with this Policy is entrusted to the authorized anti-corruption compliance SD (ACaLSD).

3. FEATURES

3.1 The main functions of this Policy are related to the complete prohibition of bribery in all processes of KazTBU named after K. Kulazhanov JSC.

3.2 Implementation of anti-corruption requirements in the business processes of the university (procurement, hiring of personnel, taking exams, etc.).

3.3 Ensuring compliance with the international standard ISO 37001 and the legislation of the Republic of Kazakhstan, in particular:

3.3.1 A direct and categorical statement prohibiting any form of bribery (offering, promising, giving, accepting or extorting improper benefits).

3.3.2 obligation to comply with the requirements of applicable anti-corruption legislation.

3.3.3 Consistency of the Policy with the strategic goals of the organization.

3.4 The preventive function is to prevent the commission of a corruption offense.

3.4.1 Regular search for "weaknesses" in subdivisions in accordance with the "Corruption Risk Assessment" DP-4.5-2025-13.

3.4.2 Identification of situations where the personal benefit of an employee interferes with the interests of the university according to "Conflict of Interest Management" DP-7.2-2025-01.

3.4.3 Raising awareness among faculty and students.

3.4.4 Verification of counterparties and job candidates before concluding contracts.

3.5 Control and monitoring function - allows the system to see what is really happening.

3.5.1 Annual internal audit. Regular verification of compliance with the QMS procedures.

3.5.2 Monitoring of feedback channels. Regular work with the hotline and trust boxes.

3.5.3 Analysis of indicators, assessment of the effectiveness of measures taken (for example, the number of resolved conflicts of interest).

3.6 Investigation function – necessary when suspicion or violation has already arisen.

3.6.1 Conducting an internal investigation, objective clarification of the circumstances of suspicious facts in accordance with the DP "Investigation and Taking Measures in Relation to Corruption" DP-8.10-2025-10.

3.6.2 Disciplinary action against violators or referral of materials to law enforcement agencies.

3.6.3 Work to minimize damage to the reputation of the university.

3.7 Corrective Function – Corrective Action Function.

3.7.1 Management of nonconformities – when the system fails, it is necessary to identify the cause according to the DP "Management of nonconformities and corrective actions of the ACMS " DP-10.1-2025-28

3.7.2 Continuous improvement - changing procedures and strengthening controls in areas where violations have occurred so that they do not recur.

3.8 Documentation and reporting function:

3.8.1 Ensuring the maintenance and storage of documentation related to the functioning of the anti-corruption management system.

3.8.2 Formation of regular reports on the implementation of anti-corruption measures for the University management.

4. GOALS, OBJECTIVES, AND PRINCIPLES IN THE FIELD OF ANTI-CORRUPTION

4.1 KazTBU named after K. Kulazhanov JSC sets anti-corruption goals for the relevant functions and management levels.

4.2 The requirements for this Policy are consistent with internal regulatory documents, the Development Program of KazTBU named after K. Kulazhanov JSC, corruption risks are measurable and take into account the results of corruption risk assessment.

4.3 Goals in the field of combating corruption should be brought to the attention of employees, teaching staff, students.

4.4 The main ***goals in the field of combating corruption***:

4.4.1 Formation of an atmosphere of intolerance to any manifestations of corruption in JSC "KazUTB named after K. Kulazhanov" with 100% coverage of all stakeholders.

4.4.2 Minimizing the risk of involvement of KazTBU named after K. Kulazhanov JSC and its employees in corrupt activities.

4.4.3 Ensuring the legal rights of employees, teaching staff and students in the field of combating corruption.

4.5 Tasks to achieve the goals:

4.5.1 Culture building – development of the principle of "zero tolerance" for all types of corruption.

4.5.2 Identification and elimination of the causes and conditions that contribute to the commission of crimes.

4.5.3 Identification, disclosure and investigation of corruption offenses.

4.5.4 Explanatory work on an ongoing basis.

4.5.4 Establishment of the procedure for preventing conflicts of interest among all interested parties of KazTBU named after K. Kulazhanov JSC.

4.6 Basic principles:

4.6.1 Strict compliance with the Constitution and anti-corruption legislation. Ensuring compliance of activities with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and the international standard ISO 37001:2016.

4.6.2 The principle of zero tolerance. Complete rejection of any form of corruption. Establishment of a clear algorithm of actions when identifying signs of bribery or conflict of interest.

4.6.3 Priority of protection of rights and freedoms. Interaction of anti-corruption entities with stakeholders of KazTBU named after K. Kulazhanov JSC.

4.6.4 Inevitability of liability. Identification, suppression, disclosure and investigation of corruption offenses. Mandatory punishment for corruption offenses regardless of positions.

4.6.5 Priority of preventive measures. The emphasis is on the prevention of corruption, and not only on punishment.

4.6.6 Consistency and complexity. Use of legal, administrative and information measures in a complex.

4.6.7 Ensuring the transparency of the activities of anti-corruption entities, taking into account the confidentiality of those who reported the fact of corruption risks.

5. CONTROLS AND SAFEGUARDS

5.1 This Policy describes the procedure for checking for the facts of corruption risks of interested parties.

5.2 This Policy establishes anti-corruption control measures.

5.3 Due Diligence:

5.3.1 Mandatory screening of candidates for key positions and business partners before concluding contracts in accordance with the rules developed in the "Sustainable Procurement Policy".

5.3.2 Restriction of the use of cash – the use of non-cash payments in the conduct of the "Purchases" process.

5.3.3 Separation of responsibilities in procurement – in the processes related to the verification of counterparties, the approval procedure by the relevant services is taken into account.

5.3.4 Anti-corruption conditions (clauses) in contracts, control of the process of grading and distribution of grants.

5.4 Gifts, hospitality and hospitality:

5.4.1 Establishment of a clear limit on the value of gifts (according to Article 367 of the Criminal Code of Kazakhstan, a gift for an amount exceeding 2 MCI is considered a bribe and entails the application of criminal liability).

5.4.2 A complete ban on receiving gifts during sessions and audits.

5.4.3 Only symbolic signs of attention within the framework of official protocol events (e.g. pens, notebooks with logo, flowers) are allowed, if their value does not exceed the legal threshold and they do not create obligations.

5.4.4 KazTBU named after K. Kulazhanov JSC does not make donations in favor of political parties or movements.

5.4.5 Any charitable assistance on behalf of KazTBU named after K. Kulazhanov JSC must be public and cannot be a veiled form of bribery to officials.

5.5 Reporting Concerns:

5.5.1 Description of the work of the Hotline, trust boxes or corporate mail of the profile service of KazTBU named after K. Kulazhanov JSC.

5.5.2 KazTBU named after K. Kulazhanov JSC ensures complete confidentiality and guarantees protection from any forms of pressure or discrimination (dismissal, deprivation of bonuses, demotion) of an employee who has reported the fact of corruption in good faith.

5.5.3 A formal commitment by the university that no one will be fired or punished for reporting corruption in good faith.

5.5.4 "Hotline**" - a special telephone number or e-mail of the compliance service.**

5.5.5 Trust boxes are physical boxes for anonymous appeals located in educational buildings.

5.5.6 A personal appeal - to the head of the LA&HRD or directly to the Rector.

5.6 Training and awareness:

5.6.1 Conduct training seminars for new employees and applicants of "KazUTB named after K. Kulazhanov" JSC.

5.6.2 Sign the familiarization sheet of this Policy for all employees of KazTBU named after K. Kulazhanov JSC.

5.7 Maintenance of registers and accounting:

5.7.1 Maintaining a register of gifts, conflicts of interest and identified corruption risks.

5.7.2 Documentation of all reports of corruption and the results of their consideration.

5.8 Internal controls:

5.8.1 Application of the "four eyes" principle (double control) in decision-making in high-risk processes.

5.8.2 Limitation of sole decision-making on matters relating to financial liabilities.

6. PREVENTION AND RESOLUTION OF CONFLICTS OF INTEREST

6.1 The Policy establishes general rules for the prevention and resolution of conflicts of interest.

6.2 The concept of conflict of interest is a situation in which the personal interest of an employee of KazTBU named after K. Kulazhanov JSC (the presence of relatives among students or counterparties, ownership of shares in supplier companies, other paid activities) affects or may affect the objective performance of his/her official duties.

***6.3 Responsibilities of employees*:**

6.3.1 In making decisions, be guided by the interests of the University, excluding the influence of personal connections.

6.3.2 Disclose in a timely manner any actual or potential conflict of interest.

6.3.3 Annually (or upon hiring) sign a declaration on the disclosure of a conflict of interest.

6.3.4 Typical situations of conflict of interest in KazTBU named after K. Kulazhanov JSC:

6.3.5 Teaching or assessment of students who are close relatives.

6.3.6 Participation of the interested party in the selection of a GWS supplier, where one of the participants is a company associated with the employee or his family.

***6.4 Procedure for resolving conflicts of interest*:**

6.4.1 The procedure is established in the DP "Rules for Resolving Conflicts of Interest" -7.2-2025-01.

6.4.2 An employee shall send a written notice to his/her immediate supervisor or to the UP&CC as soon as he/she becomes aware of the conflict.

6.4.3 The Compliance Service (LA&HRD) together with the management conducts an assessment.

6.4.4 In the course of an investigation, a staff member shall be suspended from a decision on a particular matter. At the same time, responsibilities are transferred to another employee (for example, taking an exam by another teacher).

6.4.5 Concealment of information about a conflict of interest is considered as a serious violation of the anti-corruption policy and is the basis for the application of disciplinary sanctions, up to the termination of the employment contract in accordance with the Labor Code of the Republic of Kazakhstan.

7. IDENTIFICATION AND ASSESSMENT OF CORRUPTION RISKS

7.1 This Policy defines the rules for the systematic identification, analysis and assessment of the likelihood of corruption in the activities of KazTBU named after K. Kulazhanov JSC in order to develop adequate control measures.

7.2 Assessment of corruption risks is carried out at least once a year (according to the approved schedule).

7.3 in case of significant changes in the structure of the University, the opening of new areas of study, changes in the legislation of the Republic of Kazakhstan or after the revealed facts of corruption.

7.4 Stages of the process, according to the DP, "Assessment of corruption risks" DP-4.5-2025-13:

7.5 Identification - identification of processes in which employees may be exposed to the risk of bribery (procurement, admission of applicants, final certification, distribution of places in dormitories).

7.6 Analysis – an assessment of existing controls.

7.7 Ranking is the determination of the level of each risk according to two criteria:

7.7.1 Probability of events occurring

7.7.2 Severity of consequences (financial losses, revocation of license, reputational damage).

7.7.3 The mechanism for assessing corruption risk is specified in the DP "Assessment of Corruption Risks" DP-4.5-2025-13;

7.7.4 Based on the results of the assessment, a Register of Corruption Risks and an Action Plan to Minimize Risks are formed.

8. RESPONSIBILITIES AND AUTHORITY

SP	Credentials
President	- approves the Anti-Corruption and Anti-Bribery Policy; - carries out general supervision over the implementation and effectiveness of the QMS (once a year considers reports on the functioning of the system).

Rector	- bears ultimate responsibility for the effectiveness of the QMS at the University; - ensures the allocation of the necessary resources (human, financial, technical) for the implementation of this Policy; - demonstrates leadership and personal commitment to the principles of «zero tolerance» for corruption; - appoints the head of the anti-corruption compliance service and ensures his independence.
LA&HRD	- develops and updates internal documents of the QMS (procedures for risks, conflicts of interest, investigations); - provides methodological assistance and advises employees on the application of this Policy; - has the right of direct access to the President and the Rector on bribery and violation of the SMPC; - organizes training and anti-corruption briefing for personnel.
DSD	- monitors the implementation of QMS procedures as part of internal audits; - coordinates the management of nonconformities and the control of the implementation of corrective actions after identification during the internal audit
Heads of structural departments	- ensure compliance with the requirements of the Policy within their departments; - organize timely identification of corruption risks in their business processes; - control the absence of a conflict of interest among subordinate employees; - create an atmosphere in which subordinates can openly report suspicions of corruption without fear of reprisals.
All employees	- study the Policy and strictly comply with its requirements; - disclose information about an existing or potential conflict of interest in a timely manner; - immediately report (through feedback channels or directly to the UPCS) any attempts to induce bribery or facts of corruption known to them.

9. RISKS ASSOCIATED WITH THE PROCESS AND ACTIONS TO PREVENT RISKS

9.1 Risks associated with the process:	**9.2 Risk Prevention Actions:**
- the risk of receiving a reward for a positive grade, admission to the session or defense of a thesis; - the risk of collusion with suppliers to inflate the price or choose "your" counterparty; - the risk of hiring relatives or friends in violation of qualification requirements (nepotism); - the risk of unjustified accrual of bonuses or allowances; - the risk of giving a bribe to inspection bodies during accreditation or licensing.	- Use of "Anti-plagiarism" systems, proctoring during exams (to exclude direct contact and subjectivity); - inclusion in all contracts with suppliers of the University's right to terminate the contract in case of detection of bribery; - mandatory disclosure of conflicts of interest by all participants in high-risk processes; - Ensuring the operation of a hotline for students and contractors; - checking the business reputation of partners before signing contracts.