I'M GOING TO APPROVE
University Rectors,
Ph.D., Professor
_________ N.A.Seitkulov
"___" ________ 2023

QUALITY MANAGEMENT SYSTEM

ANTI-CORRUPTION POLITICS

QMS UP ŠU 28-01-2023

Service	*Hand*	*A.J.T.*
Concerted:		
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Content

1. General rules

1.1. This "Shymkent University" (hereinafter referred to as the University) determines the main activities of the University and the general principles of conduct of officials and employees of the University in combating corruption and fraud.
1.2. This Policy has been developed in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption", the Charter of the University, the Code of Business Ethics of the University and the Best Anti-Corruption Practices.
Regulatory References This Policy uses references to the following regulatory documents:
2.1 Law of the Republic of Kazakhstan "On Combating Corruption" dated November 18, 2015 No 410-V ZRK.
2.2, Order of the Minister of Education and Science of the Republic of Kazakhstan dated May 4, 2020 No 174 "On Approval of the Anti-Corruption Standard for Ensuring Transparency and Transparency in Higher and (or) Postgraduate Education Organizations"
3. The Concept of Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026, Decree of the President of the Republic of Kazakhstan dated February 2, 2022 No 802.
4. Charter of the University;
5. Academic policy of the university.
6, Anti-Corruption Standard of Shymkent University
7. Terms, references and abbreviations
QR – Qazaqstan Respýblıkasy;
WB – Council for the Elimination of Corruption Risks (Supervisory Board);
Ученый совет;
HRMD – Human Resources Management Department;
DSDIQA - Department of Strategic Development and Internal Quality Assurance;
FACULTY – teaching staff;
GKP – training and support personnel;
LD - Legal Department.
This Policy is based on the anti-corruption legislation of the Republic of Kazakhstan, in addition to which the following terms and their definitions are defined:
Active bribery – bribery, promise, permission or payment (directly or indirectly), as well as assistance or assistance in such behavior; Next of kin–
persons who are in close relations with an official or employee of the University (parents (parents), children, adopted children, brothers and sisters with one parent and with one parent separately, parents, grandchildren, fathers, grandmothers, grandchildren) who are married, as well as with officials or employees of the University;
Bribes are material values (things or money) that a person accepts personally or through an intermediary, or any property benefit or services rendered for an action (or

rather inaction) in the interests of the bribe-giver, which this person can or may commit depending on the position he holds.
Conflict of interest is a situation in which the personal interest of an employee or an official of the University may affect or affect his/her impartial performance of duties;
Corruption offense - for this purpose, an act of offense, guilt (action or inaction), for which administrative or criminal liability is established by law, with signs of corruption;
Corruption is the provision and receipt of illegal profit, material and (or) intangible profit in any form, directly or through intermediaries, including in the form of bribery or commercial bribery; and/or we engage in corrupt practices; and/or abuse of office, abuse of power
use, as well as other illegal use of the position of an individual contrary to the legitimate interests of the University, including for the purpose of obtaining illegal benefits, material and (or) intangible benefits for oneself or third parties, or illegal transfer of such benefits by other individuals to the specified person.
Passive page-by-page or indirect request, request, consent to receive or receive a bribe;
Direct provision of the purpose of the contract (illegal remuneration) or receipt of other and other bribes to the bribe-taker and (or) bribe-taker/participating persons to achieve or implement an agreement between them on the purchase of a bribe and the purchase of a bribe.
Anti-corruption is the activity of employees and officials of the University to prevent corruption within their powers, including the formation of an anti-corruption culture at the University, the identification and elimination of the causes and circumstances that contribute to the commission of corruption offenses, as well as the identification, suppression, disclosure and investigation of corruption offenses and the elimination of their consequences;
Prevention of risks of corruption – measures aimed at introducing corporate culture, elements of the organizational structure, principles and procedures regulated by internal documents, ensuring the prevention of corruption offenses of the university;
Employee, employee – a person who is in labor relations with the University and performs work directly under an employment contract, as well as other persons involved in the contract under an agency and civil law contract; Supervisory Board – the Academic Council of the University; Department of Personnel Management; Department of Strategic Development and Internal Quality Assurance; The terms used, but not defined in the policy, are used in the meaning used in the legislation of the Republic of Kazakhstan and the internal documents of the University.
The purpose of the policy is to determine the goals, objectives and principles of the University in the field of combating corruption and fraud; - prevention, detection, suppression and detection of illegal activities, as well as the identification and identification of persons who prepared, committed or committed it; - identification and elimination of the main corruption risks and fraud risks; formation of the corporate culture of the University; - implementation of anti-corruption procedures at the

University on the basis of current anti-corruption legislation and bringing them to the attention of the University employees and other interested parties; - establishing the responsibilities of employees and officials of the University, compliance with the principles, restrictions and requirements established by the policy; - providing information channels for reporting corruption; - explanation of the measures taken at the university to prevent corruption.

Corruption, which is carried out directly or with the involvement of third parties (through the mediation) of the university, prohibits the commission of corruption offenses or bribery in any form.

The University openly declares that it does not accept corruption and voluntarily assumes additional obligations in the field of prevention of corruption offenses.

1.2. The Policy has been developed for the following purposes:

- Ensuring the compliance of the University's activities with the requirements of Kazakhstani and foreign legislation governing relations in the field of combating corruption;
- Reducing the risks of involving the university and its employees in corruption;
- Formation of a common understanding of the University, excluding corruption in its employees and officials, counterparties, representatives of state bodies, other interested persons in any of its objects and views;
- Creation of a local regulatory framework governing the activities of the University in anti-corruption.

1.3 The Policy is mandatory for all employees and officials of the University.

2. Responsibilities and Authority

2.1 This policy is approved by the Rector of the University.

2.2 The policy writer is responsible for the content, structure, and design of the approved policy. The decision on the final version of the policy will be made by the Department of Strategic Development and Internal Quality Assurance.

2.3 Responsibility for compliance with the requirements of the policy to the attention of university employees is borne by employees of the "Anti-Corruption Service" and heads of structural divisions. A record of the meeting must be made on the "Introduction Page" (Appendix B).

3. Basic principles of combating corruption

Within the framework of the University's activities, the following principles of combating corruption are followed: - the principle of "zero tolerance" (rejection of any forms and manifestations of corruption) - a complete ban on employees and officials of the University, as well as on behalf of the University and/or on its behalf, and/or on its behalf, directly or indirectly, personally or through any intermediary, other persons trying to participate in corrupt activities. - it is a structure; - The principle of "voice from above" - University officials by their behavior set an example for the University staff to maintain and promote high ethical standards and reject corruption in any of its manifestations; –

taking a set of measures and actions aimed at obtaining the necessary and reliable information about the counterparty in order to minimize the risks of business relations

with counterparties that may be involved in corrupt activities or are resistant to corruption; - the principle of corruption prevention – the introduction of rules and procedures aimed at identifying and minimizing corruption risks, primarily corporate culture, elements of the organizational structure, the adoption of preventive measures by the University to prevent corruption; - The principle of impunity – informs about the uncompromising attitude of the University to any forms and manifestations of fraud and corruption at all levels of corporate governance. the prosecution of perpetrators, their activities at the university and their working life;
in accordance with the procedure established by law and internal documents of the University, regardless of other interactions with it;
- Monitoring and monitoring
- monitors, monitors and continuously improves the procedures implemented at the University to prevent and combat corruption;
- Involvement of employees in the fight against corruption – the formation of a personal position that the University employees do not accept in any form or manifestation of corruption. To this end, all necessary measures are taken at all levels of the university to implement the policy and communicate its content to its employees, as well as other stakeholders. The University contributes to improving the level of anti-corruption culture of employees through their continuous training and practical application of the basic requirements of the policy;
- the principle of proper reporting
- The university strictly complies with the requirements of the law and the rules of reporting documents.

4. Tasks of the university staff and officials:

Employees/officials of the University in the performance of official duties:
1) Review the policy and sign the Introducing Page. By signing the familiarization page, the employee/officer undertakes to comply with the Policy. For newly hired employees, the obligation to comply with the Policy is fixed in the employment contract; 2) is guided by the Anti-Corruption Instruction and anti-corruption standards of the University;
3) take into account compliance with the Policy when assessing the employee's business qualities, including when appointing him/her to a managerial position, when resolving other personnel issues;
4) for giving, receiving gifts provided for by the Policy; for the implementation of entertainment expenses, charitable and sponsorship activities; interaction with representatives of authorities, public organizations, counterparties, intermediaries, third parties; avoid conflicts of interest; Strict compliance with reporting requirements and restrictions
5) Strict observance of the category's prohibition on the following actions:
• participation in corrupt activities, including those that do not give bribes, do not promise;
• extortion and/or withdrawal of a bribe (purchase for a commercial bribe);

• participation in commercial procurement of employees/officials of the University by contractors or contractors;
• Self-management for making payments to any person is carried out in any form to facilitate administrative, bureaucratic and other formalities, including in the form of cash or cash equivalents, valuables, services or other income of a property and non-property nature, as well as from individuals or organizations, including commercial and non-profit organizations, authorities and local self-government, to derive benefits for himself, university or third parties;
6) University officials strictly observe the strict ban on receiving applications and bribes from the University's counterparties and other third parties in the performance of their official duties;
7) Compliance with anti-corruption requirements and restrictions established by other internal documents of the University (to the extent that they do not contradict the policy)

5. Measures to combat and prevent corruption risks

5.1, Information and Training:
5.1.1 In order to form an appropriate level of corporate culture, an introductory briefing on the provisions of this Policy and related documents will be conducted with newly hired employees/officials of the University involved in the processes of accepting corruption risks
5.1.2 Training of employees/officials of the University is carried out in the form of trainings, as well as in the form of full-time training in the form of correspondence or distance learning by familiarizing themselves with this Policy, which is publicly available on the official website of the University.
5.2 Representation expenses and gifts:
5.2.1. Receiving or giving gifts, hospitality is a sign of respect and courtesy if they are symbolic, in accordance with business practice, do not pose a prestigious threat to the University, do not have hidden incentives, if they are not invited to influence decision-making and if there is no reason for other people to see such an effect, creates good business relations;
5.2.2. If the acceptance of a prize or an invitation to a business dinner/lunch, in the opinion of the employee, leads to the expectation of unjustified profit from the counterparty or a third party, he/she must inform his/her manager and the Anti-Corruption Service directly; Officials are not allowed to receive gifts at the expense of the counterparty or accept invitations to a business lunch/dinner.
5.4 The University makes all possible reasonable and lawful efforts to bring to the attention of the requirements of anti-corruption legislation and internal documents in the field of corruption and anti-corruption, regardless of the size and form of such violations, in order to bring them to justice quickly and without delay.
5.5 Failure to respond:
5.5.1 The University guarantees that employees/officials of the University who refuse to commit corruption offenses will not be brought to disciplinary responsibility;

5.5.2 The University, if such suspicion is not confirmed, employees who have honestly reported the alleged facts of corruption offenses committed by another employee/official of the University/official of the University
timely detection and suppression of measures against persons is not allowed and is not sought;
5.5.3 This Policy is a key link in the system of promoting ethical norms and principles at the University and calls for relationships with colleagues and external stakeholders on the basis of honesty and trust, seeking to avoid actions that may harm both the reputation and the environment of the University.
5.6. Communication channels:
5.6.1. In order to maintain a high level of trust in the University, the University has communication channels in order to prevent and suppress cases of fraud and corruption, through which anyone is aware of theft/extortion, fraud, bribery, commercial procurement, conflict of interest, corruption
other manifestations of corruption and violation of the Policy can be reported in a convenient form;
5.6.2. Each application is carefully considered, the results of the application are brought to the attention of the responsible persons of the University, if there are grounds, an appropriate examination is carried out in accordance with the internal documents and procedures of the University;
5.6.3. Communication channels are posted on the official website of the University, in newsstands and other public places.

6. Assessment of corruption risks

6.1 The University conducts an assessment of corruption risks to determine specific business processes that are most susceptible to corruption offenses on the part of employees, officials of the University, contractors and other third parties cooperating with the University.
6.2 When conducting an internal analysis of corruption risks, it is necessary to take a leading role:
6.2.1. The Constitution of the Republic of Kazakhstan;
6.2.2. The Law of the Republic of Kazakhstan "On Combating Corruption";
6.2.3. Approximate principles of internal analysis of corruption risks;
6.2.4. other legal acts.
6.3. Stages of internal analysis of corruption risks:
6.3.1. collection and generalization of information about the object of analysis;
6.3.2. Analysis of the presence of corruption risks of legal acts and internal documents regulating the activities of the analytical object, its organizational and managerial activities;
6.3.3. Preparation and signing of the analytical report.

7. Liability for non-compliance with the policy

7.1. Responsibility for compliance with the requirements of this Policy rests with each employee/official of the University, regardless of the position held.

7.2. Corruption offenses and/or acts of fraud on the part of an employee/official of the University are recognized as a gross violation of labor duties, for which an employee/official of the University has the right to bring to disciplinary responsibility, including for violation of the employment contract in the manner prescribed by the current legislation of the Republic of Kazakhstan.
7.3. On the above facts, the materials of the official investigation shall be transferred to law enforcement agencies with a statement on bringing the guilty persons to administrative or criminal liability.
7.4. In case of harm and damage to the University, the University reserves the right to file a civil action against the person who has committed corruption offenses and/or acts of fraud.

8. Approval, approval and entry into force

8.1. This policy is approved by the Supervisory Board of the University, the Human Resources Management Department, lawyers, teachers "On the consent sheet" (Appendix A)
8.2. The Policy is translated into Russian and English for further posting on the official website of the University.
8.3. The Policy that the Developer has signed and agrees to will be submitted to the Developer for approval.
8.4. The date of introduction of the policy is the date of approval/approval of the policy. The Policy comes into force from the moment of approval.
8.5. The approved Policy shall be drawn up on paper and in electronic form for storage.
8.6. Accessibility departments are provided with copies of the Policy by posting them on the official website of the University.

9. Save

9.1. After you post the electronic version of this Policy on the official website of the university, the contractors will read it and sign the introductory page (Appendix B). The head of the department and/or the head of the department are responsible for familiarizing the employees in the departments and divisions with the policies.
9.2. The head of the department is responsible for the handling, registration, unauthorized use and storage of copies of the document.
9.3. The full version of the document is stored in electronic format, and the title page and the familiarization sheet are printed.

10. Make changes to the policy

10.1. This Policy may be revised in the event of changes in the law or as necessary.
10.2. If, as a result of changes in the legislation of the Republic of Kazakhstan or the Charter of the University, certain policy rules contradict them, it is necessary to be guided by the norms of the legislation of the Republic of Kazakhstan or the Charter of the University until the relevant changes and additions to the policy are made.
10.3. Changes to the original policy are made by the developer. The updated version must be posted on the official website of the university no more than 5 days in advance.

Appendix A
(required)
Onboarding page

Лауазымы	Т.А.Ж.	Күні	Қолы
Ғылыметтік және жобалық істері комитеттегі профессор	Есенов Берикжан Берикжанович	28.10.24	
Жастар саясат департаментінің директоры	Жанербаева Самал Жаулыбаевна	01.11.23	
Пед. ғылымдар факультеті	Жолосбаев Д.М	01.11.23	
Математика және информатика кафедрасы	Кобеева Загира Сапарбековна	01.11.2023	
[illegible]	Долмабаева Зухра Дехканбаевна	08.11.2023	
ЖООКББО	Сабдалиева А.И		
Тіркеу офисі	Немалакулова А.А.	02.11.2023	
Студенттерге қызмет көрсету орталығы	Жұпар Бейбіт	02.11.20[illegible]	
Аға ғылыми қызметкер ҒЗИ жалпы ж/е биолог[illegible]	Керимова С.С.	02.11.2023	

Ф.4.01-06

Annex B
(required)
List of changes in the register

No	Change Notice No	Date the change was approved	Changes have been made to the document		
			Name of the performer of the change	Hand	Date