

"APPROVED"

By the decision of the Board of Directors of the NJSC
"M. Utemisov West Kazakhstan University
"

(Protocol No. _____ dated _____ 2026)

**ANTI-CORRUPTION POLICY
non-profit joint-stock company
"M. Utemisov West Kazakhstan University"**

Uralsk 2026.

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Chapter 1. GENERAL PROVISIONS

1.1 This Anti-Corruption Policy is the main document defining the goals, objectives, and principles of anti-corruption activities aimed at preventing, detecting, suppressing, and minimizing the consequences of corruption in Society.

1.2 The legal basis of the Company's Policy is the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan dated November 18, 2015 No. 410-V "On Combating Corruption" (*hereinafter-the Law*), the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026, approved by the Decree of the President of the Republic of Kazakhstan No. 802 dated 02.02.2022 (*hereinafter-the Concept*), regulating anti-corruption relations, as well as the Charter and other internal documents of the Company.

1.3 The Policy reflects the commitment of the Company and its employees to high ethical standards in performing their official duties, following the best corporate governance practices and maintaining the Company's business reputation at the proper level.

1.4 The Policy sets out:

- 1) basic requirements for combating corruption in the Company;
- 2) management and organizational bases for the prevention of corruption offenses;
- 3) anti-corruption measures, as well as minimization and/or elimination of their consequences;
- 4) education of the Company's employees studying at the University of the rules of conduct on strict compliance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company.

Chapter 2. TERMS AND DEFINITIONS

2.1. Explanation of some concepts contained in this Policy:

1) the Company's anti-corruption policy is a set of principles, methods, means and forms of influencing the interests, behavior and activities of employees aimed at preventing and combating corruption in the Company;

2) anti-corruption restrictions - restrictions established by law and aimed at preventing corruption offenses;

3) corruption is the illegal use by persons holding a responsible state position, persons authorized to perform state functions, persons equated to persons authorized to perform state functions, officials of their official (*official*) powers and related opportunities in order to obtain or extract property (*non-property*) benefits personally or through intermediaries. benefits and advantages for themselves or third parties, as well as bribery of these persons by providing benefits and advantages;

4) corruption risk the possibility of occurrence of causes and conditions that contribute to the commission of corruption offenses;

5) prevention of corruption activities of anti-corruption actors 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;

6) corruption offense - an illegal guilty act (*action or omission*) with signs of corruption, for which administrative or criminal liability is established by law;

7) conflict of interests - a contradiction between the personal interests of persons holding a responsible public position, persons authorized to perform public functions, persons equated to them, officials and employees, 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;

8) an official of the Company a person who permanently or temporarily performs organizational and administrative or administrative-economic functions in the Company;

8-1) organizational and administrative functions - the right granted in accordance with the procedure established by the Law of the Republic of Kazakhstan, to issue orders and orders that are mandatory for execution by subordinates in the service, as well as to apply incentive measures and disciplinary penalties;

8-2) administrative and economic functions the right to manage and dispose of property on the balance sheet of the organization granted in accordance with the procedure established by the Law of the Republic of Kazakhstan;

9) counterparty - a private business entity participating in public procurements implemented by the Company, a supplier of goods, works or services, a candidate for employment, and other persons of interest to the Company;

10) receiving illegal remuneration - illegal receipt of property benefits (*money, various goods, material values, etc.*) from citizens, for performing services or works that fall within the scope of duties of an employee of the Company, including intentionally creating conditions under which the victim is forced to pay remuneration in order to prevent harmful consequences of his / her legitimate interests;

11) authorized anti - corruption body-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;

12) anti-corruption entities - state bodies, quasi-public sector entities, public associations, as well as other individuals and legal entities;

13) anti-corruption Compliance Service - a division of the Company responsible for the organization and functioning of the corruption prevention system, ensuring compliance by the Company and its employees with the anti-corruption legislation of the Republic of Kazakhstan;

14) an anti-corruption clause is a condition that is included in a civil contract in order to prevent the commission of corrupt actions in its execution;

15) luxury goods - items that can be dispensed with in life, refined taste products that are affordable only for wealthy people and families.

Chapter 3. SCOPE OF THE POLICY

3.1. This Policy is valid and applies to all officials of the Company, persons equated to them, as well as employees of the Company, regardless of the level of their position and functional responsibilities.

3.2. Requirements to comply with this Policy also apply to individuals and legal entities that cooperate with the Company on the basis of civil contracts.

Chapter 4. MAIN GOALS, OBJECTIVES AND PRINCIPLES ANTI-CORRUPTION MEASURES

4.1 The purpose of the Anti-Corruption Policy is to:

- 1) elimination of corruption in the Company;
- 2) minimization of the risk of involving officials, employees, representatives and contractors of the Company, regardless of their position, in corruption offenses;
- 3) formation of a legal culture among the Company's employees that rejects corruption, ensures the principles of academic integrity in the performance of official duties, and "zero tolerance" for corruption;

4.2. The Anti-Corruption Policy reflects the Company's commitment to high ethical standards and principles of open and honest interaction, as well as the desire to improve the corporate culture, follow the best practices of corporate governance and maintain business reputation at the proper level and is based on the following principles:

- 1) compliance with the rights and legitimate interests of citizens and employees of the Company and compliance of the Company's Anti-Corruption Policy with the current legislation and generally accepted standards;

This Anti-Corruption Policy complies with the Constitution of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan and other regulatory legal acts applicable to the Company.

- 2) academic integrity in the implementation of activities;

Mandatory passing of the "Anti-plagiarism" system of research reports based on state grants, grants from the Rector, dissertations of doctoral and master students, theses of students, availability of all works published in publications of any level, etc.

- 3) publicity and openness of the Company's activities;

The Company's employees and students are regularly informed about the provisions of the anti-corruption legislation and actively participate in the formation and implementation of anti-corruption standards and procedures.

- 4) rejection of corruption in all its forms and manifestations;

- 5) personal example of the company's management;

The key role of the Company's management in forming a culture of intolerance to corruption and in creating an internal system for preventing and combating corruption.

- 6) proportionality of anti-corruption procedures to the risk of corruption;

The Company develops and implements measures to reduce the likelihood of involvement of the Company, its officials, employees, representatives and counterparties in corrupt activities.

- 7) effectiveness of anti-corruption procedures;

The Company applies such anti-corruption measures that ensure simplicity of implementation and bring significant results;

8) responsibility and inevitability of punishment;

The inevitability of punishment for officials, employees, and representatives of the Company, regardless of their position, work experience, or other conditions, if they commit corruption or other offenses, as well as the personal responsibility of the Company's management for implementing an internal Anti-Corruption Policy.

9) continuous monitoring and regular monitoring;

The Company regularly monitors the effectiveness of the implemented anti-corruption standards and procedures, as well as controls over their implementation.

10) systematic and integrated use of managerial, organizational, informational, socio-economic, legal, special and other measures to combat corruption and fraud.

4.3 The anti-corruption goal is achieved by solving the following tasks:

1) eliminating opportunities for corruption;

2) identify the conditions and causes that contribute to the commission of corruption offenses, and prevent the occurrence of their negative consequences;

3) detection, suppression and prevention of corruption and fraud;

4) establishing the obligation of officials, employees, representatives and contractors of the Company, University students to know and comply with the key norms of the anti-corruption legislation, applicable requirements of the Anti-Corruption Policy;

5) implementation of anti-corruption propaganda;

6) avoiding conflicts of interest;

7) conducting anti-corruption expertise of legal documents, documents regulating the activities of divisions and the Company, as well as draft documents of the Company;

8) education of students and subjects of the educational process with a firm belief about the incompatibility of the image of a modern citizen of the country with actions incompatible with corruption;

9) implementation of measures stipulated by the Regulations on the Company's Anti-Corruption Compliance Officer.

Chapter 5. MEASURES TO PREVENT AND COMBAT CORRUPTION

5.1 In order to achieve the set goals and complete tasks, it is necessary to carry out activities that include:

1) anti-corruption monitoring;

It consists in the need for measures to collect, process, summarize, analyse and evaluate information related to the effectiveness of anti-corruption policies, the state of law enforcement practice in the field of anti-corruption.

Monitoring is carried out by a compliance officer, the results of which are the basis for conducting an internal analysis of corruption risks.

2) internal analysis of corruption risks;

Internal analysis of corruption risks is carried out in accordance with the Standard Rules for Conducting Internal Analysis of Corruption Risks (*approved on October 19, 2016*)

by the Order of the Chairman of the Agency for Civil Service Affairs and Anti-Corruption No. 12, registered with the Ministry of Justice of the Republic of Kazakhstan on 21.11.2016 No. 14441).

The analytical report is agreed with the head of the department where the Analysis was carried out, with recommendations for eliminating the identified corruption risks, and is submitted to the Chairman of the Board-Rector for consideration and appropriate response measures.

3) approval of anti-corruption standards;

Anti-corruption standards are a system of recommendations established for the Company's activities, guarantees, restrictions or prohibitions that ensure the prevention or reduction of the impact of corruption in the Company.

4) formation of an anti-corruption culture;

One of the systemic anti-corruption measures provided for by Law and implemented by anti-corruption actors within their competence to preserve and strengthen the value system in Society that reflects intolerance to corruption.

Promotion of an anti-corruption culture is an important condition for its formation, as well as spiritual and moral education of the future generation.

To minimize corruption, special attention should be paid to young people, who are the future of the modern state. We need a pedagogical approach to the implementation of the goal, features of the content, forms, methods and means of anti-corruption education and upbringing of children and young people of different age groups. Changing the view on the theory and practice of educational and upbringing work with the younger generation should lead to the development and strengthening of civil society, education of young people who have the necessary knowledge about their civil rights and obligations, perceive corruption as a violation of their civil rights and are ready to protect these rights.

5) anti-corruption restrictions;

Officials who fall under the definition set out in paragraph 4 of Article 1 of the Law assume Anti-Corruption restrictions in accordance with Article 12 of the Law and are required to comply with all requirements and obligations of the Anti-corruption Legislation of the Republic of Kazakhstan. (*Appendix No. 1 to this Policy*)

Officials of the Company who are not subject to Anti-Corruption restrictions in accordance with the requirements of the Law must comply with all the requirements of this policy and other regulatory documents of the Company and not create prerequisites for the occurrence of corruption. (*Appendix No. 2 to this Policy*)

6) prevention and resolution of conflicts of interest;

A conflict of interest is a situation where the personal interest of an official or employee of the company may affect the way he / she performs his / her duties.

A conflict of interest in itself is not really a form of corruption, but creates a situation that can lead to corruption.

To reduce conflicts of interest or the risk of their occurrence, conflict prevention is used in the form of restrictions on actions, the obligation to recuse oneself, disclosure of interests, ethical codes, independent commissions, etc.

Settlement of conflicts of interest in the Company is carried out through the adoption of an internal regulatory act on the prevention of corporate conflicts and conflicts of interest.

7) *anti-corruption expertise of the Company's internal documents and their drafts;*

The analysis of internal regulatory documents and projects is carried out in order to establish the intention of the developer to hide, lobby for an insufficiently justified project, or mislead the public about their true intentions.

When conducting anti-corruption expertise, special attention should be paid to the following:

- coordination of the draft internal regulatory document with other regulatory legal acts or international treaties ratified by the Republic of Kazakhstan, as well as with internal regulatory documents;

- the presence of entities that can benefit from the adoption of the draft document and how to extract such benefits;

- subjects that may be affected by the draft internal regulatory document and the forms of such influence;

- financial justification of the draft internal regulatory document;

- in other cases when the right given by an internal regulatory document may lead or has led to the occurrence of negative consequences for the Company.

8) *"hotline" on anti-corruption issues;*

In order to maintain a high level of trust, as well as prevent and suppress corruption, the Company operates a "Hotline" on anti-corruption *issues (hereinafter referred to as the "hotline")*.

By contacting the hotline, any employee of the Company, counterparty, or any other person can report in a convenient form, including on the terms of confidentiality or anonymity, on the facts of corruption offenses, conflicts of interest, violations of the provisions of the Anti-Corruption Policy that have become known to them, as well as on their concerns or doubts about the compliance of their actions or actions/omissions of other employees, officials, representatives, contractors or other persons who interact with the Company in accordance with the principles and requirements of the Anti-Corruption Policy.

Hotline contacts are posted on the official website of the University on the Internet, on information stands and in other publicly accessible places.

9) *refusal of retaliatory measures and sanctions;*

1) The Company guarantees that no employee or representative of the Company will be subject to sanctions (*including dismissal, demotion, or withdrawal of incentive payments*) if he or she has reported alleged or known illegal facts with corruption background, fraud committed by any employees of the Company or other persons interacting with the Company. Company, including, but not limited to, cases where such employee refused to give or receive a bribe, commit commercial bribery, or mediate bribery.

2) The Company guarantees to maintain confidentiality in cases when a person who has informed about alleged or known illegal facts with corruption background, fraud, wishes to maintain confidentiality in order to avoid any undesirable consequences for him / her.

10) *review of information on the facts of corruption and other violations of the Anti-Corruption Policy;*

1) the compliance officer, ensures the review and thorough verification of information about existing or suspected facts of corruption offenses or other violations of the provisions of the Anti-Corruption Policy and other regulatory documents on combating corruption, which is received through any communication channels, including, but not limited to, messages sent to the "hotline", messages brought to the attention of compliance- an officer, information obtained as a result of conducting an internal or external audit of the Company. The Company implements the necessary procedures, adopts the necessary local regulations, and provides the persons conducting the audit with all the necessary powers and resources, including independence from any other officials and divisions, to conduct these official audits.

In accordance with the Rules for conducting internal audits, the results of the audit are brought to the attention of the Chairman of the Board-Rector or the Board of Directors of the Company. Based on the results of consideration of the Internal Audit Report, decisions are made to ensure compliance with the requirements of the Anti-Corruption Policy and other regulatory documents on combating corruption.

2) in case of confirmation of information based on the results of official inspections and taking appropriate measures to prevent negative consequences to the Company, with the exception of materials sent to law enforcement agencies, on the recommendation of the compliance officer, persons authorized to make decisions based on the results of inspections may take measures to encourage persons who have publicly reported alleged or known illegal facts, having corruption background, fraud.

2-1) if a person wishes to maintain confidentiality, the promotion is carried out in compliance with measures to prevent the dissemination of information about him.

3) the promotion is made at the expense of saving the Company's funds, has a one-time nature and is carried out on the basis of the Promotion Rules, persons who have reported on the background of corruption and fraud.

11) purchases of goods, works and services:

1) in public procurement, the public dissemination of information related to procurement procedures and procurement contracts, including information on invitations to bid and appropriate or relevant information on the conclusion of contracts, is a prerequisite in order to provide potential bidders with sufficient time to prepare and submit their bids;

2) the company and its officials, employees, and representatives are prohibited from engaging or using intermediaries, partners, contractors, and other persons to perform any actions that contradict the principles and requirements of the Anti-Corruption Policy or the norms of the applicable anti-corruption legislation;

3) the Company ensures that there are procedures in place for verifying intermediaries, partners, counterparties and other persons to prevent or detect violations in order to minimize and prevent the risks of involving the University in corrupt activities;

4) in order to comply with the principles and requirements stipulated in the Policy, the Company includes anti-corruption conditions(*clauses*) in contracts with intermediaries, partners, contractors, agents and other persons.

Anti-corruption conditions (*clauses*) should contain information about the general principles and anti-corruption procedures that the parties must comply with, and

determine the responsibility of counterparties for non-compliance with the principles and requirements of the Anti-Corruption Policy. (*Appendix No. 3 to the Policy*)

12) audit and control:

1) the Company conducts an internal audit of its financial and economic activities, controls the completeness and correctness of data reflected in accounting records and compliance with the requirements of applicable legislation and internal regulatory documents, including the principles and requirements established by the Anti-Corruption Policy;

2) within the framework of internal control procedures, the Company conducts inspections of key areas of activity, including spot checks of the legality of payments made, their economic feasibility, expediency of expenses, including for confirmation by primary accounting documents and compliance with the requirements of the Anti-Corruption Policy.

13) public awareness and training:

The Company makes this Policy freely available on the corporate website on the Internet, openly declares its rejection of corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all counterparties, its employees, employees and other persons.

The Company contributes to raising the level of anti-corruption culture by informing and systematically training employees in order to maintain their awareness of the company's anti-corruption policy and master the ways and techniques of applying the anti-corruption policy in practice.

In order to identify the level of awareness and knowledge of anti-corruption policy by employees, conduct testing.

Chapter 6. GIFTS AND ENTERTAINMENT EXPENSES

6.1. Officials who have accepted Anti-corruption restrictions when accepting gifts should be guided by the requirements of the Anti-Corruption Legislation of the Republic of Kazakhstan.

6.2. Gifts on behalf of the Company to other persons and organizations or received by employees in connection with their work in the Company, from organizations and other persons, as well as representation expenses, including expenses for business hospitality and promotion of the Company, must correspond to the specified requirements.

criteria:

- 1) be directly related to the legitimate objectives of the Company's activities;
- 2) be reasonably justified, proportionate, and non-luxury items.
- 3) not to create reputational risks for the Company's employees and other persons in case of disclosure of information about gifts or entertainment expenses;
- 4) do not contradict the principles and requirements of the Anti-Corruption Legislation of the Republic of Kazakhstan, the Anti-Corruption Policy and other local acts of the Company;

5) do not represent remuneration (*explicit or implicit*) for an action (*service, omission, connivance, patronage, granting rights, making a certain decision on a transaction, agreement, lobbying interests*) or an attempt to attract attention or influence the recipient;

6.3. Gifts are not allowed:

1) on behalf of the Company and its employees in the form of cash or non-cash funds, or their equivalent in any form;

2) from a subordinate person to a higher management, with the exception of intellectual property items;

3) from students, faculty members of the University, with the exception of intellectual property items.

6.4 it is forbidden for students to organize various receptions and feasts for the University's teaching staff during the exam period.

6.5 It is prohibited to transfer, offer or promise gifts on behalf of and in the public interest to a civil servant, official, or person performing managerial functions of money, securities, or other property, to provide him with property-related services, or to grant him property rights for performing an action (*omission*) related to his official position in the interests of this employee.

6.6 in order to record the provision of gifts on behalf of the Company by employees or representatives to third parties and their receipt of gifts, the Company must have appropriate gift registers.

Chapter 7. INTERACTION

7.1 The Company provides safe, confidential and accessible ways for officials, employees, representatives to inform the higher management, or the compliance officer, about the facts of corruption manifestations on the part of third parties or colleagues.

7.2 In order to develop an appropriate level of anti-corruption culture, new employees of the Company are given introductory instruction on the provisions of the Anti-Corruption Policy and related documents.

7.3 Any employee of the Company or any other person, if there are concerns or doubts about the legality of their actions, or the actions (*omissions*) of other employees, officials, representatives, contractors or other persons who interact with the Company, may report their concerns or doubts to their direct supervisor or compliance officer.

7.4 The Company refrains from paying any expenses for civil servants of the Republic of Kazakhstan, officials of international organizations and their close relatives (*or in their interests*) in order to obtain commercial benefits or general patronage, including transportation, accommodation, food, entertainment, advertising or other benefits for them at the Company's expense.

7.5 The Company's officials and employees should refrain from any proposals, the acceptance of which may put them in a situation of conflict of interest.

7.6 The Company must establish a procedure for reporting violations to law enforcement agencies.

Chapter 8. PARTICIPATION IN CHARITABLE ACTIVITIES

The Company does not finance charitable projects for the purpose of obtaining commercial benefits.

Chapter 9. PARTICIPATION IN POLITICAL ACTIVITIES

The Company does not finance political parties, organizations and movements, or individual political figures for the purpose of obtaining commercial benefits or general patronage.

Chapter 10. THOSE RESPONSIBLE FOR IMPLEMENTING THE POLICY

10.1 Responsible for implementing the Anti-Corruption Policy and adopting it in the Company is the Chairman of the Board — Rector, who ensures that the Company's employees comply with the requirements of this Policy, the current anti-corruption legislation and local regulations of the Organization aimed at implementing measures to prevent corruption.

10.2 The compliance officer responsible for ensuring the implementation of anti-corruption measures and this Policy is:

1) organizes work on preventing and combating corruption in the Organization in accordance with the Anti-Corruption Policy;

2) organizes the development of draft internal regulations aimed at implementing the Anti-Corruption Policy and submits them to the Company's Board of Directors for approval;

3) the Company adopts the necessary internal regulations and implements the necessary administrative, technical and other measures to ensure the independent operation of the Company's compliance officer.

10.3 The Compliance Officer is independent of the Company's Executive Body, is appointed by the Board of Directors and is accountable to it when implementing this Policy.

Chapter 11. LIABILITY FOR NON-COMPLIANCE WITH THE REQUIREMENTS OF THE ANTI-CORRUPTION POLICY

11.1 Officials, employees and other persons who have contractual relations with the Company are obliged to comply with the requirements of this policy, informing them about the key principles, requirements and sanctions for violations.

11.2 When entering into an employment contract, each employee of the Company, as well as its officials and representatives, must be familiarized with the Anti-Corruption Policy and internal regulations on preventing and combating corruption issued by the Company against signature.

11.3 Officials and employees of the Company, regardless of their position, are liable under the Legislation of the Republic of Kazakhstan for non-compliance with the principles and requirements of the Anti-Corruption Policy, as well as for actions (*inaction*) of their subordinates that violate these principles and requirements.

Chapter 12 COOPERATION WITH LAW ENFORCEMENT AGENCIES

12.1. Cooperation with law enforcement agencies is an important indicator of the Society's commitment to the declared anti-corruption standards of conduct.

12.2. The Company undertakes a public commitment to:

- 1) inform the law enforcement agencies about cases of corruption and other offenses that the Company has become aware of;
- 2) refrain from any sanctions against their officials and employees who reported to law enforcement agencies about information that became known to them in the course of performing their official duties about the commission of a corruption or other offense;
- 3) prevent unlawful interference of officials/employees/representatives of the Company in the activities of law enforcement agencies during anti-corruption measures;
- 4) The Company provides assistance to law enforcement agencies in carrying out measures to prevent and combat corruption.

13. MAKING CHANGES

13.1. The Company periodically reviews its policies and procedures.

13.2. The Company reserves the right to review its policies and procedures when changing the Anti-Corruption Legislation of the Republic of Kazakhstan.

Chapter 14. FINAL PROVISION

This Policy comes into force from the date of its approval by the decision of the Company's Board of Directors.

Appendix # 1
to the Anti-corruption policy of the NJSC
" M. Utemisov WKU"
No. __ from " ___ " _____ 202_

For officials of the Company and persons equated to them, in accordance with the Law of the Republic of Kazakhstan No. 410-V SAM "On Combating Corruption" dated November 18, 2015:

ANTI-CORRUPTION RESTRICTIONS

I am, _____
(last name, first name, patronymic)

In order to prevent the commission of actions that may lead to the use of my powers in personal, group and other non-official interests, taking into account the specifics established by Articles 13, 14, 15 of the Law of the Republic of Kazakhstan "On Combating Corruption" dated November 18, 2015 No. 410-V SAM, I accept anti-corruption restrictions on:

1. Carrying out activities that are incompatible with the performance of duties by an official;

- 1) inadmissibility of joint service (work) of close relatives, spouses and relatives;
- 2) use of confidential and other information of the Company that is not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 3) accepting gifts in connection with the performance of official duties in accordance with the legislation of the Republic of Kazakhstan.

2. Failure to accept anti-corruption restrictions by the Company's officials, entails refusal of admission to a position or dismissal from a position (*dismissal from a position*), their non-compliance in cases of signs of a criminal offense or an administrative offense is a ground for termination of their powers

I will comply with the terms of anti-corruption restrictions

(signature)
« ____ » _____ 20 ____ years old

Appendix # 2
to the Anti-corruption policy of the NJSC
" M. Utemisov WKU"
No. __ from " ____ " _____ 202__

Commitment

This form is used to confirm that you have really thoroughly, carefully studied and understood, thereby committing yourself to strictly follow the Anti-Corruption Policy of the NJSC "M. Utemisov WKU" (*hereinafter referred to as the Policy*) and/or the Law of the

Republic of Kazakhstan dated 18.11.2015 No. 410 - V "On Combating Corruption"
(Further - the Law).

Officials and employees of NJSC "M. Utemisov WKU" (*hereinafter referred to as the Company*) must immediately fill out and sign the established form of this commitment from the date of adoption of the Policy, and those newly accepted from the moment of beginning to perform their labor and/or official duties in the Company.

For the Company's employees:

Please fill out this form, sign it and send it in hard copy to the HR Department for inclusion in your personal file	From the moment you start performing your work duties, you must carefully study, understand and responsibly follow the requirements of the Anti-Corruption Policy:	
	Sign in the appropriate boxes:	
		I confirm that I have studied and understood the Anti-Corruption Policy.
		I am committed to following the Anti-Corruption Policy in good faith.
		FULL NAME:
		Signature:

Appendix # 3
to the Anti-corruption policy of the NJSC
" M. Utemisov WKU"

No. __ from " __ " _____ 202

Anti-corruption clause

1. NJSC "M. Utemisov WKU" informs the other party to the Agreement about the obligation to comply with the legislation of the Republic of Kazakhstan on combating corruption, the norms of business ethics and integrity, and the principles of fair competition.

2. When fulfilling their obligations under this Agreement, the Parties do not commit or encourage to commit actions that violate or contribute to the violation of the legislation of the Republic of Kazakhstan, in order to obtain any illegal advantages or to achieve other illegal goals.

3. Corruption offenses include intentional acts provided for in paragraph 29 of Article 3 of the Criminal Code of the Republic of Kazakhstan, along with this commercial bribery or other illegal use by an employee of the Parties of his official position contrary to the legitimate interests of the Parties in order to obtain benefits in the form of any goods or services of a property, physical or moral nature, obtaining other property rights for himself or third parties, or illegal provision of such benefits to the specified person by other individuals, and obtaining other property benefits and advantages, in accordance with the anti-corruption legislation of the Republic of Kazakhstan or the country of residence and/or business of the Party.

4. The Parties refuse to provide incentives to employees of the other Party that place the employee in a certain dependence and are aimed at ensuring that this employee performs any actions in favor of the stimulating Party.

5. The Parties shall render mutual assistance to each other in order to prevent corruption.

6. In accordance with paragraph 1 of Article 26 of the Law of the Republic of Kazakhstan "On Combating Corruption" (*hereinafter referred to as the Law*), transactions, contracts made as a result of corruption offenses are recognized by the court as invalid in accordance with the procedure established by the law of the Republic of Kazakhstan at the request of authorized state bodies, interested persons or the prosecutor.

7. In accordance with paragraph 2 of Article 26 of the Law, the adoption of acts and the commission of actions as a result of corruption offenses are grounds for their cancellation (*invalidation*) by persons authorized to cancel (*terminate*) the relevant acts, or in court at the request of interested persons or the prosecutor.

8. In accordance with paragraph 1 of Article 24 of the Law, a person who has information about a corruption offense that is being prepared, committed or committed, informs the superior head and / or the management of the state body or organization of which he is an employee, and / or the authorized state bodies.