

"APPROVED"

By decision of the Board of Directors of the NJSC
" M. Utemisov West Kazakhstan University"
(*Protocol No. _____ dated _____ 2026*)

Rules
conducting official investigations in the non-profit joint-stock company "M.
Utemisov West Kazakhstan University "»

URALSK, 2026

1. General provisions

1.1 These Rules for conducting official investigations in the non-profit joint-stock company "M. Utemisov West Kazakhstan University" (*hereinafter - the Rules*) are developed in accordance with the Anti-Corruption Policy of the non-profit joint-stock Company "M. Utemisov West Kazakhstan University" (*hereinafter-the Company*) and determine the procedure for conducting an Anti-Corruption Compliance Officer (*hereinafter-the Company*). ACCO) official investigations against the Company's employees on the following facts:

- 1) illegal actions containing signs of a corruption offense;
- 2) embezzlement or attempts to embezzle funds, material or intellectual property of the Company using their official position;
- 3) rendering assistance by the Company's employees (*providing confidential information*) to other legal entities and individuals to the detriment of the Company's interests;
- 4) providing / receiving illegal monetary remuneration;
- 5) exceeding or abusing official powers;
- 6) fraudulent actions on the part of the teaching staff in relation to students, undergraduates and doctoral students and other persons;
- 7) conflict of interest.

1.2 The purpose of conducting an internal investigation is to identify the causes and conditions that contribute to their commission, identify the perpetrators and ensure the principle of inevitability of punishment, bringing to justice, preventing or excluding unjustified involvement of the Company's employees, and conducting preventive measures to prevent such facts from occurring in the future.

1.3 Terms used in the Rules:

- 1) internal investigation - a public activity aimed at collecting and verifying materials, information and information in order to fully, comprehensively and objectively clarify the circumstances of the incident, analyze it, and prepare conclusions and proposals;
- 2) damage - means expenses that the Company has made or will have to make to restore the violated right, loss or damage to its property (*real damage*);
- 3) persons subject to a "high degree of corruption risk" - members of the Company's Management Board;
- 4) persons subject to a "low degree of corruption risk" - deans and their deputies, heads of departments, heads of departments of the Company, persons responsible for material and technical supply, teaching staff, administrative and managerial personnel, educational and support personnel of the Company, teaching staff.

2. Basis and organization of the internal investigation

2.1 The basis for conducting an internal investigation is:

- 1) consideration of appeals and applications from the Company's employees, students, and citizens;

- 2) letters, materials, and instructions from government agencies and legal entities;
- 3) instructions from the Board of Directors or their members;
- 4) order of the Chairman of the Management Board of the Company-Rector;
- 5) reports and service notes of the heads of the Company's structural divisions;
- 6) materials published in periodicals and publications in other mass media;
- 7) results of audits and audits;
- 8) receipt of information that requires verification.

2.2 If necessary, employees of the Company's structural divisions may be involved in conducting the audit.

2.3 None is allowed to involve in verification:

- 1) employees who are under internal investigation;
- 2) directly or indirectly subordinates of the employee in respect of whom an internal investigation is being conducted;
- 3) the head of the employee in respect of whom an internal investigation is being conducted;
- 4) employees who have any form of affiliation and conflict of interest with *the employee (s)* under internal investigation;
- 5) others involved in the facts of illegal actions.

2.4 In the course of conducting an internal investigation, public collection of information and information related to the fact of illegal actions is carried out, including:

- 1) establishes whether the fact of an illegal action actually took place;
- 2) establish the place and method of committing illegal actions, as well as other circumstances of its commission;
- 3) determines the circle of persons involved (*directly or indirectly*) in the fact of an illegal action;
- 4) establishes which norms of the legislation and local acts of the Company were violated by each of the persons involved in the fact of an illegal action;
- 5) establishes objective and other reasons for the committed offense.

3. Obligations and rights

3.1. The person being investigated has the right to:

- 1) know why the investigation is being conducted;
- 2) give written explanations on the issues of internal investigation;
- 3) submit petitions;
- 4) provide documents and material evidence for inclusion in the investigation materials;
- 5) provide witnesses for their subsequent questioning;
- 6) get acquainted with the conclusion of the internal investigation;
- 7) appeal the conclusion of the internal investigation to a higher instance.

3.2. Employees conducting an internal investigation must:

- 1) observe the rights and interests of applicants, employees and other persons involved in the internal investigation provided for by law;
- 2) draw conclusions only on the basis of documentary materials collected during the internal investigation;
- 3) when conducting an internal investigation, observe the norms of corporate ethics, respect the honor and dignity of all participants in the process;
- 4) ensure confidentiality of information about the personal life of participants in the audit, secrets protected by law and other data that became known during the internal investigation;
- 5) ensure the confidentiality of information about the person who provided the information on a confidential basis, and take all available measures to ensure its security.

3.3. Employees conducting an internal investigation have the right to:

- 1) get acquainted with regulatory legal acts and documents on issues to be clarified in the course of an internal investigation;
- 2) invite employees of the Company, as well as other persons, for an interview and receive explanations from them.

The employee's refusal to give written explanations is drawn up by a certificate of the official who conducted the internal investigation and sent to the Rector;

- 3) involve the Company's employees for consultation on issues requiring special knowledge;
- 4) request information and materials on issues related to the audit from the Company's structural divisions, state bodies, enterprises, institutions and organizations;
- 5) if necessary, inspect objects, premises, equipment, transport, and areas of terrain related to the internal investigation.

The inspection is made out by a certificate of the official who performed the inspection; use audio, video recording and photographing tools to record the information received in compliance with the requirements of current legislation.

6) If there are grounds that may affect a full and comprehensive investigation, in agreement with the Rector, remove the person in relation to whom the internal audit is being conducted from performing official duties.

4. Terms of verification

4.1 The beginning of an internal audit is registration in the Internal Audit Registration Log held by the Company's anti-corruption compliance officer.

The service check is assigned the sequential number of registration in the Log.

4.2 The verification period is up to 30 business days from the start of the internal investigation;

4.3 The period of conducting the audit is suspended for the period of stay of the person in respect of whom the audit is being conducted:

- 1) on vacation.
- 2) on a business trip.

- 3) on a temporary disability list;
- 4) on treatment;
- 5) for other valid reasons of absence from work;
- 6) appointment of expert examinations;

4.4. The term is renewed upon the employee's arrival at work and receipt of the expert opinion.

5. Completion of the internal investigation

5.1. At the end of the official investigation, the ACCO employee who conducted the official investigation prepares a conclusion, which should indicate:

- 1) names and positions of employees who conducted the internal investigation and the grounds for its conduct;
- 2) circumstances established during the investigation listed in clause 2.4 of these Rules;
- 3) the reasons and conditions that contributed to the emergence of a negative situation (*facts*);
- 4) proposals on measures aimed at eliminating the causes and conditions that contributed to the occurrence of the incident and the forms of familiarizing employees with the investigation materials;
- 5) proposals on bringing the perpetrators to justice and other measures to compensate for the damage caused and exclude the possibility of such incidents;
- 6) in case of absence of guilt of persons against whom an official investigation was conducted on the grounds specified in paragraph 2.1 of the Rules, the right to protect their rights and dignity, appeal to higher instances, or to a court is explained;
- 7) identifies the persons involved under the signature, and in case of disagreement checks their arguments, which after verification are taken into account or refuted.

5.2 The conclusion is accompanied by the documents and materials received during the internal investigation.

5.3 The conclusion is signed by ACCO or its substitute and sent to:

- 1) in respect of persons with a "low degree of risk" for approval by the Chairman of the Management Board - the Company's Rector;
- 2) in respect of persons with a "high degree of risk" to the meeting of the Strategic Development, Personnel and Remuneration Committee of the Company's Board of Directors and then submitted to the meeting of the Board of Directors;

5.4 The Rector, in accordance with subclause 1 of clause 3.3 of the Rules, gives a written instruction on the implementation of the proposals indicated in the conclusion based on the results of the internal investigation, or returns the materials for continuing the investigation.

5.5 The internal investigation under subclause 1 of clause 3.3 of the Rules is considered completed from the moment the Rector approves the Conclusion.

5.6 The internal investigation under subclause 2 of clause 3.3 of the Rules is considered completed from the moment of making a decision of the Board of Directors.

5.7 If there is evidence of a criminal offense in the actions of the persons being checked, the decision to send materials to law enforcement agencies is made by the Company's Board of Directors.

5.8 The materials of the internal investigation are formed into a separate file, which is stored in ACCO, and after 1 year is transferred to the archive.

Chapter 6. Grounds and procedure for promotion

6.16.1. Based on the results of the audit, the Anti-Corruption Compliance Officer sends to the Chairman of the Board – Rector, or the person replacing him/her (*for persons subject to a high degree of corruption risk at the meeting of the Board of Directors*) a Submission on the encouragement of the person who reported the fact or prerequisites, as well as the results of the prevention measures taken.

6.2 The Company's management, within three working days after reviewing the above-mentioned materials, makes a decision and issues an order on promotion, or denies the promotion.

6.3 For persons providing assistance in combating corruption, incentives are established in the form of a one-time cash bonus, a certificate of appreciation, and a declaration of gratitude. The amount of a one-time bonus or payment is determined by the decision of the Company's Management if there are savings.

1) For information on corruption offenses that cause minor damage (*minor damage is understood as cases for which disciplinary, administrative, civil or criminal liability has not arisen*), incentives are not provided.

2) For information on corruption offenses that could cause damage to Society, individuals are encouraged in the form of awarding a certificate, declaring gratitude and/or a one-time monetary reward.

3) For persons who actively participate in internal activities of the Company aimed at combating corruption and who have shown a positive result based on the results of these activities (*questionnaires, surveys, etc.*), as well as conscientiously support the Company's anti-corruption policy, they can also be encouraged by the Company's management in the form of awarding a certificate, declaring gratitude.

6.4 Payment of a one-time cash bonus or payments is made within ten working days from the date of making the relevant decision.

6.5 Promotion based on materials that contain elements of a crime and are sent to the authorized body for investigation is carried out in accordance with the "Rules for encouraging persons who report the fact of a corruption offense or otherwise assist in combating corruption", approved by the Government of the Republic of Kazakhstan dated December 30, 2015 No. 1131.

7. Responsibility

7.1 Employees who conducted the internal investigation are personally responsible for the accuracy and objectivity of the internal investigation.

7.2 In case of falsification, forgery of documents, dissemination of confidential information, all persons involved in the verification are subject to disciplinary,

administrative and criminal liability in accordance with the Legislation of the Republic of Kazakhstan.