

«META University»
Jaýapkershiligi shekteýli
seriktestigi



Limited Liability Partnership
«META University»

APPROVED

By order of the President of "META University"
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ANTI-CORRUPTION POLICY

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1. General Provisions

1.1. This Anti-Corruption Policy (hereinafter referred to as the Policy/Anti-Corruption Policy) has been developed in accordance with the Law of the Republic of Kazakhstan dated November 18, 2015 No 410-V "On Combating Corruption" and in pursuance of strategic objectives in the field of higher and postgraduate education and in order to prevent and suppress corruption in the Limited Liability Partnership "META University" (hereinafter referred to as the University), protecting the rights and freedoms of employees and students at the University, ensuring the rule of law, law and order, its internal, economic and information security.

1.2. The Anti-Corruption Policy defines the purpose and objectives, basic principles, subjects and measures to prevent corruption offenses at the University, as well as ensures their suppression.

1.3. In the course of the implementation of the anti-corruption policy, its main task should be solved - the creation of an anti-corruption environment at the University by forming zero tolerance for corruption.

1.4. This Anti-Corruption Policy is an internal regulatory document of the University aimed at improving the anti-corruption culture, systematizing educational and upbringing measures, motivating students, faculty and staff of the University to behave in good faith.

1.5. The requirements and actions of this Anti-Corruption Policy apply to employees and participants of the educational process of the University and other interested parties.

2. Basic terms and concepts

The following basic terms and concepts are used to implement the anti-corruption policy:

1. **Corruption** is the acceptance of property benefits in one's own interests, as well as in the interests of other persons, personally or through intermediaries, as well as the extraction of advantages to persons holding positions at the University, using their official powers and related opportunities, as well as bribing these persons by illegally providing them with these benefits and advantages by individuals and legal entities;

2. **Corruption offenses** are actions provided for by the laws of the Republic of Kazakhstan, associated with corruption or creating conditions for corruption, which entail disciplinary, administrative and criminal liability established by law;



3. **Corruption factors** - the procedure or provisions of regulatory legal acts or internal documents of the University or drafts of such acts, established unreasonably wide margins of discretion or the possibility of unjustified application of exceptions to the general rules, as well as containing uncertain, difficult or burdensome requirements for individuals and organizations and thereby creating conditions for corruption;

4. **Anti-corruption policy** - the activities of the University aimed at creating and operating an effective system for preventing and suppressing corruption offenses at the University and the formation of zero tolerance for them;

5. **Anti-corruption monitoring** - the activities of the University to implement measures to prevent, detect, suppress corruption offenses and constantly analyze the effectiveness of the functioning of the anti-corruption policy of the University in order to improve it;

6. **Anti-corruption analysis of the University's internal documents** – the activities of responsible employees to identify and describe corruption factors related to the current regulatory legal acts and/or internal documents of the University and (or) their draft, the development of recommendations aimed at eliminating or limiting the effect of such factors;

7. **Prevention of corruption offenses** – the activities of the University to identify, limit and eliminate the causes and conditions that give rise to corruption offenses or contribute to their spread at the University;

8. **Suppression of corruption offenses** is the activity of the University on the application of measures of responsibility for the committed corruption offense in accordance with the Charter of the University, internal documents of the University, laws of the Republic of Kazakhstan.

3. Legal basis of anti-corruption policy

3.1. The Anti-Corruption Policy is carried out on the basis of the Constitution of the Republic of Kazakhstan dated 30.08.1995, the Law of the Republic of Kazakhstan dated 18.11.2015 No410-V "On Combating Corruption", the Law of the Republic of Kazakhstan dated 27.07.2007 No319-111 "On Education", the Law of the Republic of Kazakhstan dated July 1, 2024 No 103-VIII "On Science and Technology Policy", the International Standard ST RK ISO 22000-2019 (ISO 22000:2018), the Anti-Corruption Standard for Ensuring Openness and Transparency in the organizations of higher and (or) postgraduate education, approved by the Order of the Minister of Education and Science of the Republic of Kazakhstan dated 04.05.2020 No174 and other applicable regulatory legal acts of the Republic of Kazakhstan, as well as international treaties



and conventions in the field of combating corruption, ratified by the Republic of Kazakhstan.

The legal basis of the anti-corruption policy is also formed by the orders of the Ministry of Science and Higher Education of the Republic of Kazakhstan, the Charter of the University and other internal regulatory documents of the University on anti-corruption issues.

In addition, the Anti-Corruption Policy takes into account the sectoral anti-corruption programs approved by the Government of the Republic of Kazakhstan.

4. Goals and objectives

4.1 The main purpose of the implementation of the anti-corruption policy at the University is to create conditions for the formation of anti-corruption consciousness and culture in the educational environment.

4.2 To achieve this goal, the following tasks for the implementation of the Anti-Corruption Policy are established:

4.2.1 consolidation of the basic principles of anti-corruption activities of the University;

4.2.2 Encouraging initiatives to promote intolerance of corruption;

4.2.3 minimizing the risk of involvement of University employees in corrupt practices;

4.2.4 participation in the organization of anti-corruption activities;

4.2.5 Fixing the responsibility of the University employees for non-compliance with the requirements of the Anti-Corruption Policy and other internal regulatory documents on anti-corruption issues.

4.2.6. Introduction of a full-time position of the Compliance Officer at the University.

5. Basic principles of anti-corruption activities

5.1. The system of anti-corruption measures at the University is based on the following principles:

5.1.1. *The principle of legality* of the anti-corruption policy, the implementation of anti-corruption measures shall comply with the current legislation and social norms of the Republic of Kazakhstan applicable to higher educational institutions.

5.1.2. *The principle of academic honesty*, encouraging teachers to apply anti-corruption mechanisms in practice, increasing the cult of knowledge among students;



5.1.3. *The principle of involvement*, active participation of teaching staff and employees regardless of degree/position in the formation and implementation of anti-corruption standards and procedures;

5.1.4. *The principle of information support*, ensuring effective "feedback" through the media, including social networks, the maximum involvement of experts and public figures on anti-corruption issues.

6. The main functions of those responsible for the implementation of the anti-corruption policy

6.1. The person responsible for the organization of all anti-corruption activities at the University is the Compliance Officer of the Compliance Service, who is appointed by order of the President of the University.

6.2. The main functions of the person responsible for the implementation of the anti-corruption policy:

6.1.1. the use of methods of persuasion, argumentation of one's position, establishing contacts with participants in the educational process;

6.1.2. analysis of regulatory documents issued by the administration in the aspect of countering the anti-corruption culture;

6.1.3. assessment of corruption risks by analyzing the business processes (procedures) of the University;

6.1.4. identifying, investigating and suppressing corruption offenses at the University;

6.1.5. development of local regulations for the prevention of corruption and other offenses;

6.1.6. systematic control over compliance with the requirements of the anti-corruption policy;

6.1.7. application of measures to prevent corruption in interaction with counterparties;

6.1.8. interaction with law enforcement agencies, including the authorized body for combating corruption.

6.1.9. The compliance officer is responsible for the compliance of the company and its employees with the norms of legislation, the rules of industry associations, corporate foundations, and ethical principles.

The compliance officer analyzes information about the objects of transactions, assesses corruption, sanctions and other risks, and develops and implements a strategy



in the area of compliance control. The compliance officer also conducts a legal examination of local documentation and takes part in audits.

Among the main responsibilities of a compliance officer, which are most often found in job descriptions, are:

- Monitoring, analysis, assessment of legal requirements and industry regulators;
- Identification of critical risks of violation of legislation;
- Building a compliance control system;
- Development of internal policies and regulations;
- Examination of contracts and agreements in terms of anti-corruption policy and compliance obligations of the parties (compliance clauses);
- Implementation of a compliance strategy;
- Audit support;
- Conducting internal investigations and reviews.

7. Subjects of anti-corruption policy

The subjects of anti-corruption policy at the University are:

- 7.1. Teaching staff, administrative, administrative, auxiliary and educational support staff of the University (employees);
- 7.2. Compliance officer of the University;
- 7.3. students of all forms of education, undergraduates and doctoral students;
- 7.4. public organizations, collegial bodies of the University involved in the implementation of the anti-corruption policy;
- 7.5. individuals and legal entities interested in the quality of educational services provided by the University.

8. Main Measures to Prevent Corruption Offenses

8.1. The anti-corruption policy consists in the development and implementation of comprehensive and consistent measures to prevent and eliminate (minimize) the causes and conditions of the emergence and maintenance of corruption in various spheres of the University's life.

Prevention of corruption offenses at the University is carried out through the use of the following measures:

- 8.1.1. anti-corruption monitoring;
- 8.1.2. comprehensive application of legal, organizational, personnel, information and propaganda, socio-economic and other measures to prevent corruption;



8.1.3. development, implementation and enforcement of general ethical principles and rules of corporate behavior of the University's employees, as well as students and other categories of students, and providing advisory assistance to the subjects of the anti-corruption policy on their application in practice;

8.1.4. conducting a transparent personnel policy, applying adequate measures of moral and material incentives and motivation of the University employees and students for professional growth, meeting the goals and objectives of the anti-corruption policy;

8.1.5. development and implementation of plans for the prevention of corruption offenses;

8.1.6. establishment of effective control over the distribution and expenditure of the University's budget funds;

8.1.7. use of AIS "Antiplagiat" in all types of educational and scientific research activities, teaching staff, students, undergraduates and doctoral students of the University;

8.1.8. conducting an anti-corruption analysis of internal documents and acts developed at the University;

8.1.9. anti-corruption law explanatory work and promotion of the principles of academic honesty, integrity and the formation of an anti-corruption culture;

8.1.10. Interaction with law enforcement agencies;

8.1.11. other measures provided for by the legislation of the Republic of Kazakhstan.

9. Rights and obligations of employees

9.1. All employees, regardless of their position and length of service at the University, in connection with the performance of their official duties, must:


9.1.1. be guided by the provisions of this Policy and strictly comply with its principles and requirements;

9.1.2. refrain from behavior that may be interpreted by others as a readiness to commit or participate in the commission of a corruption offense;

9.1.3. to bring to disciplinary responsibility to the President of the University employees who violate the requirements of the anti-corruption policy;

9.1.4. improve their skills in the prevention of corruption and related problems.

9.2. All employees of the University are prohibited directly or indirectly, personally or through the mediation of third parties, to participate in actions that may lead to corruption offenses, in order to obtain any material or personal benefit for

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themselves or third parties, or to illegally provide such benefits to the specified person by other individuals and legal entities.

10. Responsibility

10.1. All employees of the University are fully responsible, provided for by the current legislation of the Republic of Kazakhstan, for non-compliance with the requirements, principles of this Anti-Corruption Policy and the norms of the current Law of the Republic of Kazakhstan "On Combating Corruption", including the Criminal Code of the Republic of Kazakhstan, the Code of the Republic of Kazakhstan "On Administrative Offenses".

10.2. Persons guilty of violating the requirements of this Anti-Corruption Policy may be brought to disciplinary, administrative, civil and criminal liability in accordance with the procedure established by law.

11. Conclusion

11.1. The implementation of the anti-corruption policy involves long-term work on a planned basis with the involvement of all its subjects in the spirit of coordinated and interested activities of each structural unit of the University.

Such an approach is one of the main conditions for the successful advancement of the University to a leading position in the market of educational services not only in Kazakhstan, but also at the international level and, ultimately, for the University to fulfill its main social mission - the training of highly qualified and competitive specialists for our Motherland - the Republic of Kazakhstan.

11.2. Amendments and additions to this Anti-Corruption Policy are made by preparing its draft in a new edition and approved by the Order of the President of the University.