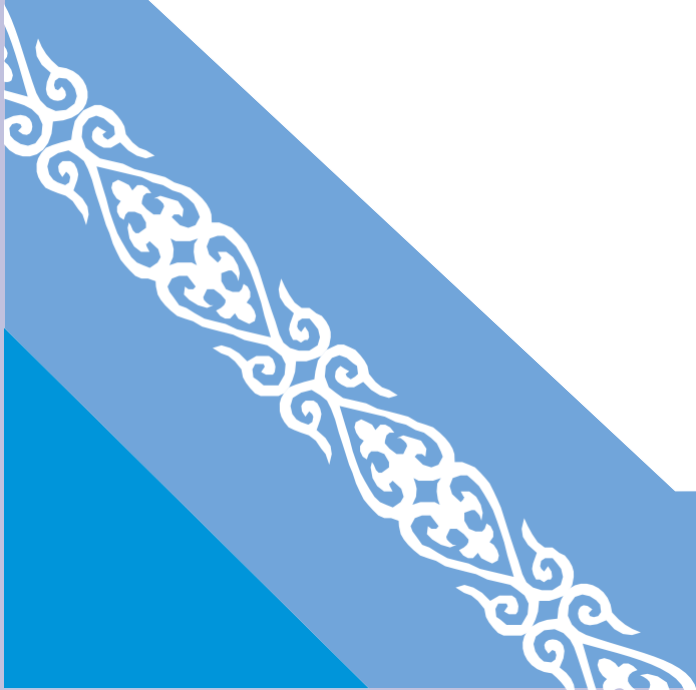




**«СЕМЕЙ ҚАЛАСЫНЫҢ ШӘХӘРІМ АТЫНДАҒЫ УНИВЕРСИТЕТІ» КеАҚ
НАО «УНИВЕРСИТЕТ ИМЕНИ ШАКАРИМА ГОРОДА СЕМЕЙ»**

**AP 042-01-2021
ANTI-CORRUPTION POLICY
UNIVERSITY**



SHAKARIM UNIVERSITY of SEMEY NJSC		
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Academic Policy		

ANTI-CORRUPTION POLICY UNIVERSITY

**Semey
2021**

*Anti-corruption Policy University approved by Chairman of the Board – Rector
Yerdembekov B.A. 20.04.2021 y.*

1 Scope

This Anti-Corruption Policy is a regulatory document of the Shakarim University of Semey (hereinafter referred to as Shakarim University), aimed at preventing and combating corrupt practices in the activities of Shakarim University.

2 Normative References

- Law of the Republic of Kazakhstan “On Combating Corruption” dated 18 November 2015 № 410-IV LRK, and methodological recommendations of the Ministry of Education and Science of the Republic of Kazakhstan on the development and adoption by universities of measures to prevent and counteract corruption.

3 General Provisions

Anti-corruption policy refers to legal, administrative, and organizational measures aimed at reducing corruption risks, fostering an anti-corruption culture, and increasing society's trust in the activities of Shakarim University.

The main objectives of implementing the Anti-Corruption Policy at Shakarim University are:

- Minimization of the risk of the university's involvement in corrupt activities
- Formation among the employees of Shakarim University, regardless of their position, of a uniform understanding of Shakarim University's policy of non-acceptance of corruption in any form or manifestation;
- summarization and clarification of the main requirements of the legislation of the Republic of Kazakhstan in the field of combating corruption applicable at Shakarim University.

To achieve the stated objectives, the following implementation tasks of the Anti-Corruption Policy are established at Shakarim University:

- establishing the basic principles of anti-corruption activities at Shakarim University;
- defining the scope of application of the Policy and the individuals falling under its purview;
- identifying the officials of Shakarim University responsible for implementing the Anti-Corruption Policy;
- establishing a list of anti-corruption measures, standards, and procedures implemented by the university, as well as the procedures for their fulfillment;
- imposing accountability on Shakarim University staff for non-compliance with the requirements of the Anti-Corruption Policy.

2. Main Principles of Anti-Corruption Activities at Shakarim University

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

1) The Principle of Compliance of Shakarim University's Anti-Corruption Policy with the existing legislation and commonly accepted norms: Ensuring that the implemented anti-corruption measures comply with the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan “On Combating Corruption” and other regulatory legal acts applicable to universities.

2) The Principle of Personal Leadership Example at Shakarim University: The university's leadership must set an ethical standard of zero tolerance towards any forms and manifestations of corruption at all levels by leading by example through their behavior.

- 3) The Principle of Involvement of TS:** Active participation of TS regardless of their position, in the development and implementation of anti-corruption standards and procedures.
- 4) The Principle of Zero Tolerance:** Non-acceptance of corruption in any form or manifestation within Shakarim University.
- 5) The Principle of Periodic Risk Assessment:** Shakarim University conducts periodic identification and assessment of corruption risks inherent in the activities of the university as a whole and in its departments specifically.
- 6) The Principle of Transparency:** Informing the public about the Anti-Corruption Policy implemented at Shakarim University.
- 7) The Principle of Accountability and Inescapable Punishment:** Inescapable Punishment for employees of Shakarim University regardless of their position, length of service, or any other conditions in the event of committing corruption offenses in connection with the performance of their duties; accountability of the management for the implementation of the anti-corruption policy.

3. The individual responsible for implementing the Anti-Corruption Policy

The person responsible for organizing all events aimed at combating corruption at Shakarim University is appointed by the university rector's order. The main responsibilities of the person responsible for implementing the Anti-Corruption Policy are:

- Preparation of recommendations for decision-making on matters of combating corruption at Shakarim University;
- Preparation of proposals aimed at eliminating the causes and conditions that generate the risk of corruption at Shakarim University; development and submission to the approval of the University Council of Shakarim University projects of regulatory acts aimed at implementing measures to prevent corruption;
- Conducting activities aimed at identifying corrupt practices by employees of Shakarim University; organizing the assessment of corruption risks;
- Organization of training events on the prevention and combating of corruption;
- Assisting authorized representatives of supervisory and law enforcement agencies during their inspection checks of Shakarim University's activities regarding corruption prevention and combating;
- Organization of events on the prevention and combating of corruption; participation in organizing anti-corruption propaganda; conducting evaluations of the results of anti-corruption efforts and preparing relevant reporting materials.

4. Responsibilities of Shakarim University employees related to the prevention and combating of corruption:

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

- Follow the provisions of this Policy and strictly adhere to its principles and requirements;
- Refrain from behavior that could be interpreted by others as the willingness to commit or participate in corrupt practices.

5. Anti-corruption measures:

5.1. As an appendix to the Current Policy, Shakarim University annually approves an Anti-corruption Action Plan indicating the deadlines for implementation and the responsible

executor.

5.2. In order to implement anti-corruption behavioral standards among employees at Shakarim University, general rules and principles of conduct affecting business ethics are established, aimed at fostering ethical and conscientious behavior among employees.

Such general rules and principles of conduct are enshrined in the Code of Ethics and Service Behavior of the teaching staff of Shakarim University approved by the rector of Shakarim University.

5.3. One of the elements of the Anti-Corruption Policy is the assessment of corruption risks. The purpose of assessing corruption risks is to identify specific operations in the activities of Shakarim University where there is a high probability that employees of Shakarim University may commit corrupt offenses for personal gain.

5.4. In Shakarim University, employees should receive training on the prevention and combating of corruption on the following topics:

- legal liability for committing corruption offenses;
- familiarization with the requirements of legislation and internal documents of Shakarim University on combating corruption and the procedure for their application in the university's activities;
- interacting with law enforcement agencies on corruption prevention and counteraction issues.

5.5. The internal control conducted by Shakarim University contributes to the prevention and detection of corruption offenses. Of particular interest is the implementation of such tasks of the internal control and audit system as ensuring compliance of Shakarim University's activities with the requirements of regulatory legal acts and local regulations of the university.

5.6. Interacting with partners, Shakarim University informs about the anti-corruption standards adopted by the university in conducting activities, including the possibility of incorporating certain provisions on compliance with anti-corruption standards into contracts. Shakarim University seeks to establish and maintain business relationships with those partners who conduct business conscientiously and honestly, care about their reputation, demonstrate support for high ethical standards in business conduct, implement measures to combat corruption, and participate in collective anti-corruption initiatives.

5.7. Shakarim University informs the public about the degree of implementation and successes in the implementation of anti-corruption measures, including posting relevant information on the official website on the Internet.

6. Responsibility for non-compliance with the Anti-Corruption Policy.

6.1. Shakarim University and all its employees must comply with the provisions of the current anti-corruption legislation of the Republic of Kazakhstan.

6.2. All employees of Shakarim University are responsible, as provided by the current legislation of the Republic of Kazakhstan, for adhering to the principles and requirements of this Policy.

6.3. Individuals found guilty of violating the requirements of this Policy may be subject to disciplinary, administrative, civil, and criminal liability.

