

"APPROVED"

Rector of Khoja Akhmet Yassawi
International Kazakh-Turkish University

"_____" "_____" 2022

QUALITY MANAGEMENT SYSTEM

UNIVERSITY POLICY

JS-IKTU-001-2022

ANTI-CORRUPTION POLICY

FOREWORD

1. Developed and Implemented by the Strategic Development, Ranking, Compliance Monitoring, and Quality Center
2. Developed by: Head of the Strategic Development, Ranking, Compliance Monitoring, and Quality Center Zh. Daribayev
Approved and implemented by the Senate meeting decision of Khoja Akhmet Yassawi International Kazakh-Turkish University on "_____" "_____" 2022, No. _____
3. Implemented: 2022
4. Review Date: 2024

Publication for Official Use

Turkistan

TRANSLATED FOR THE WEBSITE

1. SCOPE OF APPLICATION

1. The Anti-Corruption Policy defines the conditions for the preliminary consideration of issues related to anti-corruption actions at Khoja Akhmet Yassawi International kazakh-turkish university, the protection of citizens' rights, the prevention of threats arising from corruption manifestations, and the preparation of proposals aimed at increasing the effectiveness of anti-corruption measures.
2. This Policy is the main document in the implementation of anti-corruption actions.
3. This Policy of the University must be obligatorily implemented and followed in all structures of Akhmet Yassawi University.
4. JS-IKTU-001-2022 Anti-Corruption Policy is part of the quality management documents of Akhmet Yassawi University.

2. NORMATIVE REFERENCES (REFERENCE DOCUMENTS)

2.1 The University Policy references the following normative documents:

- Constitution of the Republic of Kazakhstan;
- Law of the Republic of Kazakhstan on Education;
- Law of the Republic of Kazakhstan on Science;
- Labor Code of the Republic of Kazakhstan;
- Law of the Republic of Kazakhstan on Anti-Corruption Actions;
- ISO 9001-2015 “Quality Management Systems. Requirements” standard;
- ISO 37001-2016 “Anti-Corruption Management Systems. Requirements and Guidance for Use” standard;
- University Charter;
- Strategic Development Plan until 2026;
- CP-IKTU-7.5.3-2020 Procedure for Documented Information Management.

3. TERMS, DEFINITIONS, AND ABBREVIATIONS

3.1 The following abbreviations are used in the University Policy:

- Akhmet Yassawi University, University – Khoja Akhmet Yassawi International Kazakh-Turkish University;
- AS – Academic staff;
- QMS – Quality Management System;
- ACP – Anti-Corruption Policy;
- SD – Structural Divisions;
- Policy – Anti-Corruption Policy of Khoja Akhmet Yassawi International Kazakh-Turkish University;
- Compliance Service – The activity of the University’s Strategic Development, Ranking, Compliance Monitoring, and Quality Center.

4. RESPONSIBILITY AND AUTHORITY

4.1 The Anti-Corruption Policy of the University will be discussed and reviewed at the Senate meeting of Akhmet Yassawi University.

4.2 The Anti-Corruption Policy of the University will be approved by the senior management of Akhmet Yassawi University.

4.3 The implementation of the requirements of the University's Anti-Corruption Policy is the responsibility of the Strategic Development, Ranking, Compliance Monitoring, and Quality Center of Khoja Akhmet Yassawi International Kazakh-Turkish University.

4.4 The senior management of the University is responsible for the quality implementation of this Policy.

5. GENERAL PROVISIONS

1. According to the Law of the Republic of Kazakhstan on "Anti-Corruption Actions", corruption is understood as the use of official authority or related powers by individuals performing state duties, or by those equated to them, for personal gain, including obtaining property benefits or advantages that are not stipulated by law, either directly or through intermediaries, and the illegal offer of such benefits or advantages by individuals or legal entities in return, thus leading to bribery.
2. Corruption acts or actions that create conditions for corruption, as defined by the Law of the Republic of Kazakhstan on "Anti-Corruption Actions" and other related laws, as well as the violations established by this Policy regarding corruption, are considered corruption and offenses.

5.1 Goals and Objectives of the Anti-Corruption Policy

5.1.1 The main goal of the Anti-Corruption Policy is to enhance the effectiveness of anti-corruption actions at Khoja Akhmet Yassawi International Kazakh-Turkish University, protect citizens' rights, prevent threats arising from corruption manifestations, and carry out measures to reduce violations.

5.1.2 To achieve the objectives of the anti-corruption actions policy, the following tasks are set:

- 1) To ensure compliance with the legislative principles in anti-corruption actions, improve legal culture and awareness, and organize broad educational measures aimed at raising awareness about anti-corruption in the university, fostering a corruption-free mindset among academic staff, employees, and students (Appendices 1 and 2), and creating an environment that openly rejects any form of corruption, condemns it, and does not accept it.
- 2) To increase the effectiveness and performance level of educational, scientific, and organizational-methodical activities carried out to prevent and reduce corruption risks in the structural divisions of the University, under conditions of transparency and public accountability, and to monitor the implementation of the university's strategic tasks, as well as to identify manifestations of "corruption" within the structural divisions.
- 3) To identify employees involved in corruption and hold them strictly accountable to prevent their actions. By determining the causes and situations leading to corruption within the organization, to correct its harmful aspects, prevent such behavior, and raise the level of legal awareness.
- 4) To prevent the deepening of corruption within the organization by holding individuals accountable, regardless of their honorary titles and positions.
- 5) To apply strict measures (such as dismissal, referral to law enforcement agencies, etc.) based on reports from law enforcement bodies regarding employees involved in corruption, and to consider holding the heads of the structural divisions where the employees work directly accountable.
- 6) To create an ongoing environment in which employees are fully aware that they will face severe penalties if they engage in corruption.

5.2 Types of Offenses that Lead to Corruption

The following actions by the employees, academic staff, students, and auxiliary staff of Akhmet Yassawi University are considered offenses that create conditions for corruption:

1. **Illegal interference** with the activities of other structures outside the main organizational structure of the university, as approved by the university administration.
2. **Abuse of office** by officials to satisfy their material interests while resolving issues related to the personal benefit of university employees.
3. **Providing illegal preferences** (such as nepotism, family ties, etc.) to employees applying for a position or promotion that are not specified by law.
4. **Granting unauthorized advantages** during the preparation of various decisions, resolutions, or documents for the university without the approval of the decision-making body.
5. **Providing illegal assistance** during the organization of social, cultural, sports, and recreational activities for students, academic staff, and employees of the university, or in relation to private business or other services that are not stipulated by law.
6. **Using confidential information** obtained while carrying out duties, if it is not subject to public disclosure, for personal or group interests.
7. **Unjustified refusal** to provide information to Akhmet Yassawi University employees, academic staff, students, and auxiliary staff that is required by law and related to their duties, or providing it inaccurately, with delays, or incompletely.
8. **Repeated violation** of the legal procedures for considering complaints and solving other matters within the scope of their authority by employees, academic staff, students, and auxiliary staff of Akhmet Yassawi University.
9. Giving gifts to high-ranking officials, using their official powers to obtain material benefits, advantages, or privileges, and providing services outside of their official duties as specified in their service instructions.
10. Creating obvious obstacles for employees, academic staff, students, and auxiliary staff of Akhmet Yassawi University in exercising their rights and legal interests.
11. Assigning control and oversight duties at the university level to individuals who do not hold such status or authority within the university.
12. Accepting any form of reward (in the form of money, services, or other forms) for fulfilling official duties as defined in the service instructions, unless otherwise stipulated by law.

5.3 Responsibility for Offenses Creating Opportunities for Corruption

5.3.1 Any violation committed by Akhmet Yassawi University staff, academic staff, students, and auxiliary personnel mentioned in clauses 1), 6), 7), 8), 9), 10) of section 5.2 of Article 5 of this Regulation, unless it involves signs of a criminal act, will result in disciplinary action in accordance with the Labor Code of the Republic of Kazakhstan. This may include a reduction in rank, or if there are no lower positions available, a formal warning regarding the mismatch of their position as per the procedure stipulated by law. If any of the aforementioned violations are repeated within one year after the imposition of disciplinary action for the first violation, the person may be dismissed or released from the duties assigned to them as per the procedure established by law.

Any violation by Akhmet Yassawi University staff, academic staff, students, and auxiliary personnel, as described in clauses 2), 3), 4), 5), 11), 12) of section 5.2 of Article 5 of this Regulation, will result in dismissal or cessation of the performance of duties stipulated in their service instructions if no criminal act is identified.

5.3.2 Any information regarding violations committed by Akhmet Yassawi University staff, academic staff, students, and auxiliary personnel, as mentioned in all sections of Article 5, section 5.2, where signs of a criminal act are present, must be submitted to the state legal

authorities by the university rector based on the recommendation of the compliance control service.

5.3.3 In cases where a violation related to corruption or actions creating conditions for corruption is identified, disciplinary action will be carried out from the day the violation is established, in accordance with the applicable laws of the Republic of Kazakhstan.

5.3.4 Individuals who provide clearly false information about corruption and violations committed by Akhmet Yassawi University staff, academic staff, students, and auxiliary personnel will be held accountable. In particular, university staff who knowingly report false information regarding corruption and violations will be dismissed from their position or removed from their duties by the senior management, based on the recommendation of the compliance control service.

5.4. Main Directions and Ways of Implementing Anti-Corruption Policy

To achieve the goals and objectives in accordance with the anti-corruption policy of the Khoja Akhmet Yassawi International Kazakh-Turkish University, the following activities are planned:

1. Organize activities in the field of anti-corruption policy.
2. Create active working groups in faculties and structural departments, if necessary, to carry out anti-corruption actions.
3. Establish a special hotline at the university to collect information about corruption and other violations and open a journal to record incoming messages. Additionally, install suggestion boxes for complaints and comments in all academic buildings.
4. Organize monthly individual reception of citizens by the university administration according to a set schedule.
5. Publish information on anti-corruption measures in academic buildings and dean's offices, and prepare stands with relevant materials.
6. Publish information on anti-corruption measures in the press.
7. With the approval of the university administration, monitor the work of the admission commissions and ensure that the procedures for admitting students to undergraduate, graduate, residency, and doctoral programs comply with regulations, including the proper distribution of scholarships from Turkey and the organization of the educational process. Also, ensure the adherence to procedures during session exams and midterm assessments.
8. Monitor the distribution of places in dormitories by the vice-rector for social and cultural development, ensuring transparency and openness between students and parents, in cooperation with structural departments and the dean's office.
9. Conduct public monitoring of the quality of major construction and repair works carried out under state programs and the university's master plan, as well as the effective use of allocated funds.
10. Establish public control through the ethics and disciplinary commission to ensure that budgetary and other funds allocated to the university are spent according to the planned direction, ensuring timely and efficient use, and preventing misuse of funds, procurement inefficiencies, and violations of financial discipline.
11. Conduct anti-corruption campaigns in collaboration with youth organizations.
12. Update the activities of the Ethics and Disciplinary Commission.
13. Establish platforms for anti-corruption integrity.
14. Plan to hold legal education sessions for students in faculties on the following topics:
 - a) "Corruption is a plague, its elimination is a duty"
 - b) "No to Corruption"
 - c) Identify the attitudes of students towards corruption;
 - d) Organize thematic events such as "Clean Session" and others.
15. Appear in the mass media, conduct seminars, and organize roundtable discussions.
16. Organize lectures on corruption issues at faculties in collaboration with law enforcement

agencies and pedagogical staff.

17) Task the Department of Law with developing educational and methodological tools and leaflets providing information on the threats posed by corruption and methods of counteracting it for university staff, students, master's and doctoral students.

18) Use the assistance of future journalists in conducting journalistic investigations to combat corruption.

19) Organize conferences, seminars, debates, and legal education hours to enhance the legal awareness of university faculty, staff, and young students.

20) Install video surveillance equipment in classrooms and corridors during National Unified Testing and other exam periods (intermediate, current, and final exams) to prevent corruption and enhance control.

21) Monitor the placement of students in dormitories and ensure compliance with internal regulations, preventing actions that may lead to corruption.

22) Recognize and encourage employees and students involved in the implementation of the university's anti-corruption policies, boost their activity, and apply other incentives.

5.4 Anti-corruption Policy Functions, Authorities, and Organization of its Work

5.5.1 The functions related to the anti-corruption policy are carried out by the Compliance Monitoring Service, the Internal Security Department, and the Ethics and Disciplinary Committee.

5.5.2 The program for combating corruption, including proposals for improving internal regulatory documents, forms and methods for combating corruption in accordance with anti-corruption legislation, is formulated and submitted to the university leadership.

5.5.3 Monitoring and analysis of the state of anti-corruption efforts, violations of the code of ethics by university faculty and staff, as well as the data and information from the commission and working groups, are conducted.

6. Procedure for Introducing Changes

6.1 The management of the anti-corruption policy and the introduction of changes are carried out in accordance with the document management procedure CP-IKTU-7.5.3-2020.

6.2 Any changes made to the QMS document should be registered in the "Change Registration Sheet" (Appendix 3).

7. Agreement, Preservation, and Distribution

7.1 The discussion and approval of the anti-corruption policy are conducted at a Senate meeting and documented in the minutes.

7.2 The responsibility for maintaining, reproducing, and distributing the working copy of the anti-corruption policy to users lies with the head of the Human Resources Management Department. The anti-corruption policy will be sent to the following addresses: Vice-Rectors, Deans of Faculties, Directors of Research Institutes, Heads of Departments, Faculty and Staff, and Students.

7.3 The responsibility for maintaining the control copy of the anti-corruption policy lies with the head of the Strategic Development, Ranking, Compliance Monitoring, and Quality Center.

APPROVED

I, _____
(Student's full name, faculty, group)

Being a student of the Khoja Akhmet Yassawi International Kazakh-Turk University, I recognize my responsibility in implementing the university's mission and combating corruption, and I consider it my duty to uphold and develop this policy.

Considering the corporate culture and image of the university, I am committed to contributing to the establishment of genuine democratic relations between students, faculty, and university administration.

Based on the contractual relationships formed for receiving educational services from the university, I fully commit to complying with the following:

1. To comply with the Constitution of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan, and the requirements of the university's anti-corruption policy and internal regulatory documents;
2. To respect the status of the university, and to honor the title of student at the Khoja Ahmed Yassawi International Kazakh-Turk University with my dignity and labor;
3. To refrain from any actions that are contrary to the interests of the university and may harm the reputation of the student;
4. To respect the business reputation of the university, avoid any actions that contradict the university's interests, and prevent any actions that could damage its reputation;
5. To learn about and respect the university's uniqueness, its advanced traditions and history, and to set a good example through personal achievements among fellow students;
6. To learn about the history of Kazakhstan, the Republic of Turkey, and other Turkic-speaking countries, to respect and cherish their national cultures, traditions, and university traditions, and to preserve and respect them;
7. To adhere to the dormitory rules and responsibilities, refrain from inappropriate behavior or actions, maintain cleanliness, avoid damaging university property, refrain from smoking outside designated areas, and prevent the introduction and use of alcohol, drugs, psychotropic, and toxic substances within the university campus;
8. Not to engage in actions that interfere with the normal functioning of civil society and organizations, or hinder the fulfillment of student duties (e.g., participating in illegal strikes, unsanctioned protests, etc.);
9. Not to engage in bribery, or any activities that could lead to actions falling under this term, including offering, promising, giving, accepting, or demanding illegal advantages in any form (financial or non-financial), either directly or through intermediaries, and not to stimulate or reward individuals acting or refraining from acting within their official duties by violating the applicable laws anywhere, thus avoiding the breakdown of the university's anti-corruption management system.

By signing this document, I confirm that I have read, accepted, and agree to the terms outlined above.

(Signature)

(Date)

Anti-corruption Policy Compliance DECLARATION

This document is strictly confidential (to be filled out) and is intended solely for internal use at the Khoja Akhmet Yassawi International kazakh-turkish University. The content of this document is not disclosed to third parties and cannot be used for any other purposes.

From: (Full name of the university employee filling out the declaration)
Position: (Indicating the name of the structural department)
Date Filled: (Date and month)

When filling out the declaration, it is important to note that all the questions raised apply not only to you but also to your spouse (relatives), parents (including stepparents), children (including adopted children), relatives, and nieces and nephews, your spouse's parents and siblings, as well as your nephews and nieces. I confirm that I have read the following documents:

- Anti-corruption policy;
- Regulations on preventing and resolving conflicts of interest for officials and employees.

Signature: _____

№	Question Topic	Yes	No
1.	Do you report cases of bribery and conflicts of interest at the university?		
2.	Are you aware of the possibility of disciplinary action for violating the requirements of the university's anti-corruption management system?		
3.	Due to the nature of your position, do you accept official gifts, donations, hospitality, etc.?		
4.	Do you participate in any transactions on behalf of the university (decision-making, approval of work performed, approval of payment documents, selection of suppliers, etc.)?		
5.	Is your work related to the use of the university's material resources and infrastructure for scientific, commercial, or contractual work with third-party organizations (governmental, private, quasi-governmental, foreign)?		
6.	Have you made payments to external organizations or allowed the university's authorized payments?		
7.	Do any members of your family (close relatives) work or study at the university?		

8.	Do any members of your family (close relatives) work directly under your supervision at the university?		
9.	Does any member of your family (close relatives) work at the university in a position that gives them administrative, social, or managerial influence over you?		
10	Are you currently in a position of material responsibility?		
11	Do you participate in any commercial, scientific, or entrepreneurial activities outside your work at the university (e.g., contractual work, private business, etc.)?		
12	Have you conducted training (informing) for university employees or your colleagues (subordinates) based on the university's anti-corruption policy requirements?		
13	Have you informed your family members (close relatives) or people related to your position about the existence of an anti-corruption management system at the university?		

Your additional explanatory information (if necessary):

Hereby, I confirm that I have read and understood all the questions, and that my answers and explanatory information are complete, truthful, and correct.

Signature: _____ (Full Name)_____

CHANGE REGISTRATION FORM

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FAMILIARIZATION PAGE

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