






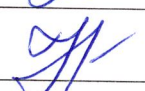
APPROVED

by the decision of the Board  
of International University of  
Information Technologies" JSC  
Minutes No. 12/25 dated March 20,  
2025

## ANTI-CORRUPTION POLICY OF INTERNATIONAL INFORMATION TECHNOLOGY UNIVERSITY JOINT STOCK COMPANY

P-65

Edition 2

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## 1 GENERAL PROVISIONS

1.1 This Anti-Corruption Policy constitutes the principal framework delineating the aims, objectives and guiding principles of anti-corruption initiatives within International Information Technology University JSC (hereinafter referred to as "the Company"). It is designed to prevent, detect, suppress, and mitigate the ramifications of corrupt practices.

1.2 The legal foundation of this Policy is derived from the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan No. 410-V, enacted on November 18, 2015, titled "On Combating Corruption" (hereinafter referred to as "the Law"), and the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022–2026, ratified by Presidential Decree No. 802 on February 2, 2022 (hereinafter referred to as "the Concept"). Additionally, the Policy is informed by the international standard ISO 37001, "Anti-Corruption Management Systems" as well as other applicable regulatory legal acts governing anti-corruption efforts, alongside the Company's Charter and internal regulatory documents.

1.3 This Policy affirms the Company's and its employees' unwavering commitment to the highest ethical standards in the execution of their official responsibilities, adherence to best practices in corporate governance, and the preservation of the Company's corporate reputation at an exemplary level.

1.4 The Policy establishes the following:

- fundamental requirements for anti-corruption compliance within the Company;
- governance and organizational principles for the prevention of corruption-related offenses;
- mechanisms for combating corruption, including strategies for minimizing and/or remedying its consequences;
- educational initiatives for Company employees and University students, ensuring adherence to the ethical and legal norms prescribed by the legislation of the Republic of Kazakhstan and the Company's internal regulatory framework.

## 2 TERMS AND DEFINITIONS

2.1 Definition of Key Concepts within this Policy:

1) **Anti-Corruption Policy of the Company** – a framework encompassing principles, methodologies, instruments, and mechanisms designed to influence the interests, conduct, and activities of employees, with the objective of preventing and combating corruption within the Company.

2) **ISO 37001 "Anti-Corruption Management Systems"** – an international standard that provides a structured framework for organizations of all types to prevent, detect, and address corruption. This is achieved through the adoption of an anti-corruption policy, the appointment of a compliance officer, training programs, risk assessments, due diligence on projects and business partners, financial and commercial controls, as well as the establishment of reporting and investigative procedures.

3) **Anti-Corruption Restrictions** – legally prescribed limitations aimed at preventing the occurrence of corruption-related offenses.

4) **Corruption** – the unlawful exploitation of official (or service-related) powers by individuals holding positions of public responsibility, those authorized to exercise governmental functions, individuals equated to such persons, and Company officials, for the purpose of securing property-based or non-property-based benefits and advantages for themselves or third parties, either directly or through intermediaries. Corruption also includes the bribery of such persons through the provision of undue benefits or advantages.

5) **Corruption Risk** – the probability of circumstances and conditions arising that facilitate the commission of corruption-related offenses.

6) **Prevention of Corruption** – proactive measures undertaken by anti-corruption entities to analyze, identify, constrain, and eliminate factors conducive to corruption, through the formulation and implementation of a system of preventive strategies.

7) **Corruption Offense** – an unlawful and culpable act (whether an action or omission) characterized by elements of corruption, for which administrative or criminal liability is prescribed by law.



8) **Conflict of Interest** – a situation in which the personal interests of individuals holding responsible governmental positions, those authorized to execute governmental functions, individuals equated to them, officials, or employees, are in conflict with their official responsibilities, potentially leading to a failure to perform or an improper execution of their official duties.

9) **Company Official** – an individual who, either permanently or temporarily, undertakes organizational, managerial, administrative, or economic responsibilities within the Company:

- Organizational and Administrative Functions – the legally prescribed authority to issue directives and instructions that are mandatory for subordinates, as well as the power to impose disciplinary measures and grant incentives;
- Administrative and Economic Functions – the legally sanctioned authority to manage and dispose of organizational assets and property.

10) **Counterparty** – a private-sector entity engaged in procurement activities conducted by the Company, including suppliers of goods, services, or works, as well as prospective employees and other stakeholders of interest to the Company.

11) **Receiving Illegal Remuneration** – the unlawful acquisition of financial or material benefits (including money, goods, assets, etc.) from individuals in exchange for the execution of duties assigned to an employee of the Company. This also includes deliberately creating conditions that coerce the victim into providing remuneration to avoid adverse consequences affecting their legitimate interests.

12) **Authorized Body for Combating Corruption** – the governmental authority responsible for formulating and implementing the anti-corruption policy of the Republic of Kazakhstan, overseeing coordination in the field of anti-corruption, and carrying out the prevention, detection, suppression, disclosure, and investigation of corruption-related offenses, including through its territorial divisions.

13) **Entities Involved in Combating Corruption** – government agencies, quasi-public sector entities, public associations, as well as other individuals and legal entities engaged in anti-corruption efforts.

14) **Anti-Corruption Compliance Service/Compliance Officer/Internal Control Specialist** – a designated unit within the Company, or a specialist, responsible for overseeing the integrity of the anti-corruption framework, ensuring adherence to the anti-corruption legislation of the Republic of Kazakhstan, and implementing corruption prevention measures.

15) **Anti-Corruption Clause** – a contractual provision that the Company is entitled to incorporate into civil agreements to preclude corrupt practices during the contract's execution.

16) **Luxury Item** – an item that is non-essential for daily life, typically associated with refined tastes and accessibility limited to affluent individuals and families.

### 3 SCOPE OF THE POLICY

3.1 This Policy is applicable to all officials of the Company, individuals equated to such officials, as well as all employees of the Company, irrespective of their hierarchical position or functional responsibilities. Additionally, it extends to students of the University.

3.2 The obligation to adhere to this Policy also extends to individuals and legal entities engaged in cooperation with the Company under civil law contracts.

### 4 ANTI-CORRUPTION OBJECTIVES AND PRINCIPLES

4.1 The primary **objectives** of this Anti-Corruption Policy are as follows:

- 1) The eradication of corruption within the Company;
- 2) The minimization of the risk of Company officials, employees, representatives, and contractors — regardless of their position — becoming involved in corruption-related offenses;
- 3) The development of a legal and ethical culture among the Company's employees that fosters an unequivocal rejection of corruption, upholds the principles of academic integrity in the execution of official duties, and reinforces a policy of "zero tolerance" for corruption;

4.2 The anti-corruption policy reflects the Company's commitment to high ethical standards and the principles of open and honest interaction, as well as its aspiration to improve corporate culture, follow



best corporate governance practices, and maintain a proper level of business reputation. It is based on the following **principles**:

1) Compliance with the rights and legitimate interests of citizens and the Company's employees, as well as adherence of the Company's Anti-Corruption Policy to applicable legislation and generally accepted norms.

This Policy conforms to the Constitution of the Republic of Kazakhstan, the international standard ISO 37001 Anti-Corruption Management Systems, the national legislation of the Republic of Kazakhstan, and other regulatory legal instruments applicable to the Company.

2) Academic integrity in the conduct of activities.

Research reports conducted under state grants, grants from the Chairman of the Board-Rector, doctoral and master's dissertations, undergraduate theses, and published works at any level must undergo mandatory verification using the Antiplagiarism system to ensure academic integrity.

3) Transparency and Public Accessibility of the Company's Activities;

Employees, students, and master's and doctoral candidates are regularly informed about anti-corruption legislation and actively participate in the formulation and implementation of anti-corruption standards and procedures.

4) Absolute Rejection of Corruption in Any Form or Manifestation;

5) Exemplary Leadership by the Company's Management.

The Company's leadership plays a key role in fostering a culture of intolerance toward corruption and in establishing an internal organizational framework for preventing and combating corrupt practices.

6) Proportionality of Anti-Corruption Measures to Corruption Risks.

The Company devises and enforces measures aimed at mitigating the likelihood of its officials, employees, representatives, and contractors becoming involved in corrupt activities.

7) Effectiveness of Anti-Corruption Procedures.

The Company adopts anti-corruption measures that ensure ease of implementation while yielding significant and tangible results.

8) Accountability and the Inevitability of Sanctions.

The inevitability of punishment for officials, employees, and representatives of the Company, regardless of their position, length of service, or other conditions, in the event of committing corruption or other offenses, as well as the personal responsibility of the Company's management for the implementation of the internal Anti-Corruption Policy.

9) Continuous Oversight and Periodic Monitoring.

The Company conducts regular assessments to evaluate the effectiveness of its anti-corruption measures and ensures their consistent implementation.

10) Systematic and comprehensive use of managerial, organizational, informational, socio-economic, legal, specialized, and other measures in combating corruption and fraud.

4.3 The achievement of the goal of combating corruption is implemented through the following **objectives**:

- Elimination of opportunities for corruption;
- Identification of conditions and causes contributing to corruption offenses and prevention of their negative consequences;
- Detection, suppression, and prevention of corruption and fraud;
- Establishing the obligation of officials, employees, representatives, and counterparties of the Company, as well as students of the University, to be aware of and comply with key anti-corruption laws and applicable requirements of the Anti-Corruption Policy;
- Conducting anti-corruption advocacy;
- Prevention of conflicts of interest;
- Conducting anti-corruption expertise of legal documents, regulations governing the activities of the Company's divisions, as well as draft documents of the Company;
- Educating young students and participants in the educational process with a strong conviction that the image of a modern citizen of the country is incompatible with actions associated with corruption.



## 5 ANTI-CORRUPTION MEASURES

5.1 To achieve the established objectives and fulfill the designated tasks, the following measures shall be implemented:

### **1) Anti-Corruption Monitoring.**

This entails systematic collection, processing, summarization, analysis, and evaluation of information regarding the effectiveness of anti-corruption policies and the enforcement of legal measures in the realm of corruption prevention.

### **2) Internal Analysis of Corruption Risks.**

The internal analysis of corruption risks shall be conducted in accordance with the Model Rules for Conducting Internal Analysis of Corruption Risks (approved on October 19, 2016, by Order No. 12 of the Chairman of the Agency for Civil Service Affairs and Anti-Corruption).

The analytical report shall be reviewed by the head of the relevant department, which was the subject of the analysis, and shall include recommendations for the elimination of identified corruption risks. The report shall be submitted to the Chairman of the Board-Rector for consideration and the adoption of appropriate remedial measures.

### **3) Approval of Anti-Corruption Standards.**

Anti-corruption standards constitute a framework of recommendations, safeguards, restrictions, and prohibitions established for the Company's activities to ensure the prevention or mitigation of corruption risks (Appendix No. 1 to this Policy).

### **4) Fostering an Anti-Corruption Culture.**

As a systematic measure in combating corruption, the promotion of an anti-corruption culture is mandated by law and is implemented by relevant anti-corruption entities within their jurisdiction. The objective is to instill and reinforce societal values that reflect an unwavering rejection of corruption.

The promotion of an anti-corruption culture is a crucial condition for its formation, as well as for the moral and ethical education of future generations.

To minimize corruption, special attention should be given to young people, who represent the future of a modern state. A pedagogical approach is necessary for implementing the goal, considering the specifics of content, forms, methods, and means of anti-corruption education and upbringing for children and youth of different age groups. A shift in perspective on the theory and practice of educational and upbringing work with the younger generation should lead to the development and strengthening of civil society, fostering youth equipped with essential knowledge of their civil rights and responsibilities, who perceive corruption as a violation of their rights and are prepared to defend them.

### **5) Anti-Corruption Restrictions.**

Officials falling within the scope of paragraph 4 of Article 1 of the Law shall adhere to the Anti-Corruption Restrictions outlined in Article 12 of the Law and must fully comply with all legal requirements and obligations prescribed by the anti-corruption legislation of the Republic of Kazakhstan (Appendix No. 1 to this Policy).

Company officials to whom Anti-Corruption Restrictions are not explicitly applicable under the Law must nonetheless comply with all provisions of this Policy and other regulatory documents of the Company. They are further obligated to refrain from creating conditions conducive to corruption (Appendix No. 2 to this Policy).

### **6) Prevention and Resolution of Conflicts of Interest.**

A conflict of interest arises when the personal interests of a Company official or employee have the potential to influence the impartial performance of their duties.

A conflict of interest itself is not a form of corruption, but it creates a situation that may lead to corruption.

To reduce conflicts of interest or the risk of their occurrence, preventive measures are used, such as restricting certain actions, mandatory recusal, disclosure of interests, ethical codes, independent commissions, etc.

In the Company, conflict-of-interest resolution is carried out through the adoption of an internal regulatory act on the prevention of corporate conflicts and conflicts of interest

### **7) Anti-Corruption Examination of Internal Documents and Drafts.**



Internal regulatory documents and draft policies shall be subject to analysis to identify any concealed intentions, undue lobbying efforts, or potential misrepresentation of objectives.

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

- 1) The consistency of draft internal regulatory documents with other legislative instruments, including ratified international treaties and internal Company regulations;
- 2) The identification of entities that may derive undue benefits from the adoption of such documents and the mechanisms by which such benefits may be obtained;
- 3) The identification of subjects who may be affected by the proposed regulatory document and the nature of such influence;
- 4) The financial rationale underpinning the draft internal regulatory document;
- 5) Any other circumstances wherein the provisions of an internal regulatory document may result in or have resulted in adverse consequences for the Company.

#### **8) Operation of an Anti-Corruption Hotline.**

To foster trust, prevent corruption, and facilitate its suppression, the Company operates a confidential and anonymous "Hotline" for reporting corruption-related offenses, conflicts of interest, violations of the Anti-Corruption Policy, and other ethical concerns.

By contacting the "hotline," any employee of the Company, counterparty, or any other person may report, in a convenient form, including confidentially or anonymously, any known facts of corruption offenses, conflicts of interest, violations of the Anti-Corruption Policy, as well as express concerns or doubts regarding the compliance of their own actions or the actions/inactions of other employees, officials, representatives, counterparties, or other individuals interacting with the Company with the principles and requirements of the Anti-Corruption Policy.

The Hotline's contact details shall be publicly available on the University's official website, information boards, and other accessible locations.

#### **9) Prohibition of Retaliation and Sanctions Against Whistleblowers.**

The Company guarantees that no employee or representative will be subject to sanctions (including dismissal, demotion, or loss of incentive payments) for reporting suspected or known illegal activities with corruption implications or fraud committed by any employees of the Company or other persons interacting with the Company. This guarantee also applies in cases where an employee refuses to give or receive a bribe, engage in commercial bribery, or act as an intermediary in bribery.

The Company guarantees confidentiality in cases where a person reporting suspected or known illegal activities with corruption implications or fraud wishes to remain anonymous to avoid any undesirable consequences.

#### **10) Review and Investigation of Corruption Allegations.**

1) The Company's management ensures the review and thorough verification of information regarding existing or suspected corruption offenses or other violations of the Anti-Corruption Policy and other regulatory documents on combating corruption. This includes information received through any communication channels, such as reports submitted to the "hotline," disclosures made to officials, and information obtained from internal or external audits of the Company. The Company implements the necessary procedures, adopts relevant internal regulations, and grants individuals conducting investigations all necessary authority and resources, including independence from other officials and departments, to carry out these internal investigations.

In accordance with the Rules for Conducting Internal Investigations, the results of the investigation are communicated to the Chairman of the Management Board-Rector, the Internal Audit Service, or the Board of Directors of the Company. Based on the review of the Internal Investigation Report, decisions are made to ensure compliance with the requirements of the Anti-Corruption Policy and other regulatory documents on combating corruption.

- If the information is confirmed as a result of internal investigations and appropriate measures are taken to prevent negative consequences for the Company (excluding materials forwarded to law enforcement agencies), the individuals authorized to make decisions based on the investigation results may take measures to reward those who have openly reported suspected or known illegal activities with corruption implications or fraud.



- If a person wishes to maintain confidentiality, the reward is granted while ensuring measures are taken to prevent the disclosure of their identity.
- The reward is granted as a one-time payment, funded from the Company's cost savings.

### **11) Procurement of Goods, Works, and Services:**

1. Transparency in procurement procedures is a mandatory requirement, including providing information on invitations to participate in tenders to ensure that potential bidders have sufficient time to prepare and submit their tender/competition proposals;

2. The Company and its officials, employees, and representatives are prohibited from engaging or using intermediaries, partners, counterparties, or other persons to carry out any actions that contradict the principles and requirements of the Anti-Corruption Policy or the provisions of applicable anti-corruption legislation;

3. The Company ensures the implementation of procedures for verifying intermediaries, partners, counterparties, and other persons to prevent or detect violations, aiming to minimize and eliminate the risk of the University being involved in corrupt activities;

4. To ensure compliance with the principles and requirements set forth in the Policy, the Company has the right to include anti-corruption clauses in contracts with intermediaries, partners, counterparties, agents, and other parties.

5. Anti-corruption clauses must include information on general principles and anti-corruption procedures that the parties are required to follow, as well as define 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 Internal Control:**

1. The Company shall conduct internal audits of its financial and economic activities to ensure compliance with legislative requirements and internal regulatory provisions, including the principles set forth in the Anti-Corruption Policy;

2. As part of internal control measures, key operational areas shall be reviewed, including random audits of financial transactions to assess their legality, economic justification, and adherence to the Anti-Corruption Policy.

### **13) Public Awareness and Education:**

The Company publishes this Policy in open access on its corporate website, publicly declares its rejection of corruption, and encourages and supports compliance with the principles and requirements of this Policy by all counterparties, employees, and other relevant persons.

The Company promotes the enhancement of anti-corruption culture by informing and systematically training employees to maintain their awareness of the Company's anti-corruption policy and to equip them with the skills and methods for its practical implementation.

## **6 GIFTS AND REPRESENTATIVE EXPENSES**

6.1 Officials who have accepted anti-corruption restrictions regarding the acceptance of gifts must comply with the requirements of the legislation of the Republic of Kazakhstan on combating corruption.

6.2 Gifts given on behalf of the Company to other individuals and organizations, as well as those received by employees in connection with their work in the Company from organizations and other individuals, along with representation expenses—including business hospitality and Company promotion expenses—must comply with the specified criteria:

- 1) Be directly associated with the lawful objectives of the Company's operations;
- 2) Be reasonably justified, proportionate, and not classified as luxury items;
- 3) Not pose reputational risks for the Company's employees or other involved parties in the event of public disclosure of information regarding such gifts or entertainment expenses;
- 4) Not conflict with the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan, the Anti-Corruption Policy, or other internal regulations of the Company;
- 5) Not constitute, either explicitly or implicitly, a form of remuneration for any action (or inaction), service, favoritism, patronage, granting of rights, decision-making related to transactions or agreements, or lobbying of interests.



6.3 Gifts are not allowed if they:

- 1) Gifts in the form of cash, non-cash funds, or their equivalent in any form, whether given on behalf of the Company or by its employees;
- 2) Gifts presented by subordinates to their superiors, except in cases of intellectual property transfers;
- 3) Gifts from students, master's students, or doctoral candidates to the University's teaching staff, with the exception of intellectual property.

6.4 Students, master's students, and doctoral students are prohibited from organizing receptions or banquets for the university's faculty during the examination period.

6.5 The transfer, offering, or promise of gifts on behalf of and in the interests of the Company to a public official, an official, or a person performing managerial functions—including money, securities, other property, the provision of property-related services, or the granting of property rights—in exchange for actions (or inaction) in favor of such an official related to their official position is prohibited.

6.6 To record the provision of gifts on behalf of the Company by employees or representatives to third parties, as well as the receipt of gifts by them, the Company must maintain appropriate gift registries.

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## **7 INTERACTION**

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7.1 The Company ensures safe, confidential, and accessible means for officials, employees, and representatives to report to senior management any instances of corrupt practices by third parties or colleagues.

7.2 The Company welcomes suggestions for improving anti-corruption procedures and control measures.

7.3 To establish an appropriate level of anti-corruption culture, new employees of the Company undergo an introductory briefing on the provisions of the Anti-Corruption Policy and related documents.

7.4 Any employee of the Company or any other person who has concerns or doubts about the legality of their own actions or the actions (or inaction) of other employees, officials, representatives, counterparties, or other persons interacting with the Company may report their concerns or doubts to their immediate supervisor or the Company's management.

7.5 The Company refrains from covering any expenses for public officials of the Republic of Kazakhstan, officials of international organizations, and their close relatives (or in their interests) to obtain commercial advantages or general patronage. This includes expenses for transportation, accommodation, meals, entertainment, advertising, or any other benefits provided at the Company's expense.

7.6 Officials and employees of the Company must refrain from making any offers that could place a public official in a conflict of interest situation.

7.7 The Company must establish a procedure for reporting violations to law enforcement authorities.

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## **8 PARTICIPATION IN CHARITY**

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The Company does not provide financial support for charitable projects with the intent of securing commercial advantages.

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## **9 PARTICIPATION IN POLITICAL ACTIVITIES**

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The Company does not fund political parties, organizations, movements, or individual political figures for the purpose of obtaining commercial benefits or preferential treatment.

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## **10 RESPONSIBILITY FOR ANTI-CORRUPTION POLICY IMPLEMENTATION**

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10.1 The person responsible for implementing and enforcing the Anti-Corruption Policy in the Company is the Chairman of the Board – Rector, who must ensure that the Company's employees comply with the requirements of this Policy, the applicable anti-corruption legislation, and the Organization's internal regulatory acts aimed at implementing anti-corruption measures.

10.2 The Anti-Corruption Compliance Service / Internal Control Specialist is responsible for ensuring the implementation of anti-corruption measures and this Policy, which:

1) Coordinating efforts to prevent and combat corruption within the Organization in accordance with the Anti-Corruption Policy;

2) Organizing the development of internal regulatory documents aimed at implementing the Anti-Corruption Policy;

3) Ensuring the adoption of necessary internal regulations and the implementation of administrative, technical, and other measures to guarantee the independent operation of the Company's Anti-Corruption Compliance Service/Internal Control Specialist.

## **11 LIABILITY FOR NON-COMPLIANCE WITH THE REQUIREMENTS OF ANTI-CORRUPTION POLICY**

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11.1 Officials, employees, and all individuals engaged in contractual relations with the Company are required to adhere to the provisions of this Policy. They must be informed of its fundamental principles, requirements, and the sanctions applicable for violations.

11.2 Every employee of the Company, upon entering into an employment contract, as well as all officials and representatives, must formally acknowledge their familiarity with the Anti-Corruption Policy and the internal regulations concerning corruption prevention and enforcement. This acknowledgment must be confirmed by their signature.

11.3 Officials and employees of the Company, irrespective of their position, shall be held liable in accordance with the legislation of the Republic of Kazakhstan for any failure to comply with the principles and requirements of the Anti-Corruption Policy. Furthermore, they bear responsibility for the actions or omissions of their subordinates that result in violations of these principles and requirements.

## **12 COOPERATION WITH LAW ENFORCEMENT AGENCIES**

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12.1 Collaboration with law enforcement agencies serves as a crucial indicator of the Company's commitment to the proclaimed anti-corruption standards of conduct.

12.2 The Company undertakes a public obligation to:

1) Report to law enforcement agencies any instances of corruption or other offenses of which the Company becomes aware;

2) Refrain from imposing any sanctions against its officials or employees who, in the course of performing their official duties, have reported to law enforcement authorities any information concerning the commission of a corruption-related or other offense;

3) Prevent any unlawful interference by the Company's officials, employees, or representatives in the activities of law enforcement agencies during anti-corruption measures;

4) Provide assistance to law enforcement agencies in their efforts to prevent and combat corruption.

## **13 INTRODUCTION OF AMENDMENTS**

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13.1 The Company periodically reviews its policies and procedures to ensure their continued relevance and effectiveness.

13.2 The Company reserves the right to revise its policies and procedures in the event of amendments to the regulatory legal acts of the Republic of Kazakhstan concerning anti-corruption measures.



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**14 FINAL PROVISIONS**

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This Policy shall enter into force on the date of its approval by the decision of the Board of the Company.

Annex No. 1  
to the Anti-Corruption Policy,  
approved by the decision of the Board  
of JSC "International University  
of Information Technologies"  
dated "20" March 2025  
(protocol No. 12/25)

Для должностных лиц Общества и приравненных к ним лицам, в соответствии с Законом  
For officials of the Company and individuals equated to them, in accordance with the Law of the  
Republic of Kazakhstan No. 410-V ZRK "On Counteracting Corruption" dated November 18, 2015:

### ANTI-CORRUPTION RESTRICTIONS

I, \_\_\_\_\_  
(last name, first name, patronymic)

in order to prevent actions that may lead to the misuse of my official powers for personal, group, or other non-official interests, and considering the provisions established by Articles 13, 14, and 15 of the Law of the Republic of Kazakhstan "On Counteracting Corruption" No. 410-V ZRK dated November 18, 2015, undertake to comply with the following anti-corruption restrictions:

1. Engagement in activities incompatible with the duties of an official, including:
  - 1) The prohibition of joint service (employment) with close relatives, spouses, and in-laws;
  - 2) The use of confidential and other proprietary information of the Company, which is not subject to official disclosure, for the purpose of obtaining or deriving material and non-material benefits and advantages;
  - 3) The acceptance of gifts in connection with the performance of official duties, in accordance with the legislation of the Republic of Kazakhstan.
2. Failure to accept these anti-corruption restrictions by officials of the Company shall result in refusal of appointment to the position or dismissal (removal from office). Non-compliance with these restrictions, in cases where there are indications of a criminal offense or an administrative violation, shall serve as grounds for termination of the official's powers.

I hereby commit to fulfilling the conditions of these anti-corruption restrictions.

(Signature)

" \_\_\_\_\_ " \_\_\_\_\_ 20 \_\_\_\_\_



Annex No. 2  
to the Anti-Corruption Policy,  
approved by the decision of the Board  
of JSC "International University  
of Information Technologies"  
dated "20" March 2025  
(protocol No. 12/25)

## COMMITMENT

This form is used to confirm that you have thoroughly and carefully studied, comprehended, and thereby undertake to strictly adhere to the Anti-Corruption Policy of JSC "MUIT" (hereinafter referred to as the "Policy") and/or the Law of the Republic of Kazakhstan No. 410-V "On Counteracting Corruption" dated November 18, 2015 (hereinafter referred to as the "Law").

Officials and employees of "IITU" JSC (hereinafter referred to as the "Company") must complete and sign the prescribed form of this commitment immediately upon the adoption of the Policy, and newly hired employees must do so from the commencement of their employment and/or official duties within the Company.

For Company Employees:

Please complete, sign, and submit this form in printed format to the Department of Personnel and Documentation Management for inclusion in your personal file.	From the moment you begin performing your job responsibilities, you are required to carefully study, comprehend, and fully adhere to the requirements of the Anti-Corruption Policy.	
	Put your signature in the appropriate cells	
		I confirm that I have studied and understood the Anti-Corruption Policy
		I undertake to conscientiously comply with the Anti-Corruption Policy
	Name and Surname	
	Signature	Date

Annex No. 3  
to the Anti-Corruption Policy,  
approved by the decision of the Board  
of JSC "International University  
of Information Technologies"  
dated "20" March 2025  
(protocol No. 12/25)

## ANTI-CORRUPTION CLAUSE

1. "International Information Technology University" JSC informs the other Party to the Agreement of its obligation to comply with the legislation of the Republic of Kazakhstan on counteracting corruption, as well as business ethics, integrity standards, and the principles of fair competition.

2. In fulfilling their obligations under this Agreement, the Parties shall not engage in or induce actions that violate or contribute to the violation of the legislation of the Republic of Kazakhstan for the purpose of obtaining undue advantages or achieving other unlawful objectives.

3. Corruption offenses include intentional acts as specified in Paragraph 29, Article 3 of the Criminal Code of the Republic of Kazakhstan. Additionally, they encompass commercial bribery or any other unlawful use of an employee's official position contrary to the legitimate interests of the Parties to obtain benefits in the form of property, services, physical or moral advantages, or the acquisition of other property rights for themselves or third parties. This also includes the unlawful provision of such benefits to the specified person by other individuals, as well as the receipt of illicit property benefits and advantages, in accordance with the anti-corruption legislation of the Republic of Kazakhstan or the country where the Party is operating and/or conducting business.

4. The Parties refrain from offering incentives to employees of the other Party that would create a dependency and influence them to perform actions in favor of the incentivizing Party.

5. The Parties shall provide mutual assistance to one another in the prevention of corruption.

6. In accordance with Paragraph 1, Article 26 of the Law of the Republic of Kazakhstan "On Counteracting Corruption" (hereinafter referred to as the "Law"), transactions and agreements concluded as a result of corruption offenses shall be deemed invalid by a court ruling, in accordance with the procedure established by the legislation of the Republic of Kazakhstan, upon the request of authorized state bodies, interested parties, or the prosecutor.

7. In accordance with Paragraph 2, Article 26 of the Law, the adoption of acts and the commission of actions resulting from corruption offenses serve as grounds for their annulment (recognition as invalid) by persons authorized to cancel (terminate) the relevant acts or through judicial proceedings upon the request of interested parties or the prosecutor.

8. In accordance with Paragraph 1, Article 24 of the Law, a person who possesses information about a planned, ongoing, or completed corruption offense is required to report it to their superior and/or the management of the state body or organization in which they are employed, and/or to the authorized state bodies.