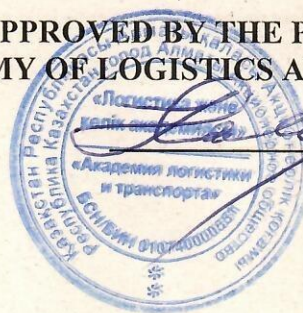


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**“Academy of Logistics and Transport” JSC**

**Working Instruction**  
**«Anti-Corruption policy»**  
**WI-ALT-19**

**APPROVED BY THE PRESIDENT - RECTOR**  
**“ACADEMY OF LOGISTICS AND TRANSPORT” JSC**



**S.AMIRGALIYEVA**  
02/02/2022

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## 1. SCOPE OF APPLICATION

1.1. This working instruction is intended for use in the Joint Stock Company "Academy of Logistics and Transport" ("ALT" JSC) in the operation of an integrated management system in accordance with the requirements of Standards of Republic of Kazakhstan (ST) ISO 9001-2016, ST RK ISO 50001-2019, ST RK ISO 14001-2016, ST RK ISO 45001-2019. This working instruction "Anti-Corruption Policy" reflects the commitment of ALT JSC to high ethical standards of conducting open and honest work in accordance with the accepted norms of corporate culture, following the best practices of corporate governance and maintaining business reputation at the proper level, representing a set of interrelated principles, procedures and measures aimed at combating corruption.

1.2. All employees of JSC "ALT" must be guided by this Anti-Corruption Policy and strictly comply with its principles and requirements.

1.3. The anti-corruption policy also applies to students and persons involved in joint activities of JSC "ALT". The purpose of the anti-corruption policy is to prevent corruption, increase legal literacy and zero tolerance for corruption in the activities of ALT JSC, its employees and management staff. The objectives of the anti-corruption policy development are:

1) Formation of sustainable anti-corruption behavior and responsibility of the administration, teaching staff and employees of JSC "ALT" in the exercise of functional responsibilities;

2) Timely detection of corruption manifestations and prevention of their negative consequences.

The principles of the anti-corruption policy are:

1) Legality;

2) Transparency;

3) Ethics;

4) Respect for the rights and legitimate interests of students, teaching staff, employees, and their protection from corruption;

5) prevention of conflicts of interest.

The anti-corruption policy is applied in the activities of JSC "ALT" in the exercise of functions and the exercise of the rights and legitimate interests of employees, JSC "ALT".

The anti-corruption policy is based on direct actions to fulfill official duties from the point of view of preventing manifestations of corruption in:

1) Realization of the rights and legitimate interests of students, teaching staff and employees affected by the anti-corruption policy;

2) Preparation and adoption of managerial and other decisions within their competence;

3) Other socially significant relations, depending on the specifics of the relevant sphere of life.

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## 2. REGULATORY REFERENCES

References to the following regulatory documents are used in this working instruction:

2.1. Normative references according to international and national standards:

- IS ISO 9000:2015 - Quality management systems. Basic provisions and vocabulary.
- S RK ISO 9001-2016 MC ISO 50001:2018 - Quality management systems. Requirements.
- S RK ISO 50001-2019 - Energy management systems. Requirements and application guidelines.
- S RK ISO 14001-2016 - Environmental management systems. Requirements and application guidelines.
- S RK ISO 45001-2019 - Occupational safety and health management systems. Requirements.

2.2. Republican legislative framework:

- The Law of the Republic - On Education of Kazakhstan dated 27.07.07 №319-111
- The Law of the Republic - On Combating Corruption of Kazakhstan dated 18.11.2015 №410-V
- The Law of the Republic - On Joint-Stock Companies of Kazakhstan dated 13.05.2003 №415-11
- Decree of the President of the Republic of Kazakhstan - On the approval of the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026 and amendments to some decrees of the President of the Republic of Kazakhstan dated 02.02.2022 №802

2.3. Regulatory references to internal regulatory documents:

- DP-AL-01 - Management of documented information
- DP-ALT-02 - Internal audit
- DP-AL-03 - Management of nonconformities and corrective actions
- DP-AL-04 - ISM analysis by management
- DP-ALT-05 - Identification, assessment and risk management
- DTP-ALT-06 - Information exchange, involvement and counseling
- KP-ALT-08 - Educational work
- KP-ALT-88 - Regulations on the Working Group on Combating and preventing Corruption

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### 3. TERMS, DEFINITIONS AND ABBREVIATIONS

3.1. In this working instruction, the terms and their definitions are used in accordance with international and republican standards IS ISO 9000:2015, ST RK ISO 9001-2016, regulatory legal acts of the Republic of Kazakhstan and internal regulatory documents of JSC "ALT".

3.2. In this working instruction, the following designations and abbreviations are used:

IMS	-	Integrated management system
PM	-	Process Map
WI	-	Working Instructions
RRA	-	Representative of the RA ISM Management -
Chief of Staff		
SD	-	Structural division
DAAD	-	Department of Academic Affairs of the Dmp - Department of Youth Policy and Marketing of the Teaching Staff - Teaching staff

### 4. RULES OF CONDUCT FOR EMPLOYEES OF JSC "ALT"

When exercising the rights and legitimate interests of ALT JSC and its employees:

1) Not to accept any material benefits, services and other privileges related to the performance of their duties in the exercise of their official powers;

2) Not to allow conflicts of interests, if they arise, take measures to eliminate them in accordance with the law;

Not to use official position in the implementation of educational and other services in order to benefit yourself or third parties;

To value the business reputation of ALT JSC, to refrain from participating in activities that contradict or damage the rights and legitimate interests of ALT JSC, to stop any attempts to discredit its honor and authority;

To prevent the unjustified transfer of information about the personal data of employees of JSC "ALT";

To ensure the promotion of employees through the ranks, observing the principles of meritocracy and on a competitive basis, taking into account such factors as knowledge, qualifications, experience, productivity and efficiency;

The rights of teachers to benefit from their original ideas, discoveries and inventions, as well as to profit from their implementation should be protected by regulatory documents;

Acceptance by employees of JSC "ALT" of active participation in determining the ways of development of science and education, and technology.

In other relationships arising in the provision of educational, scientific and other services:

Strictly comply with the requirements of the Constitution of the Republic of Kazakhstan, the Labor Code of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On Education", "On Science", "On state property", anti-corruption and other legislation of the Republic of Kazakhstan;

To prevent the commission of misdemeanors and other offenses for which the laws of the Republic of Kazakhstan provide for disciplinary, administrative or criminal liability;

Not to use official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;

When performing their official duties, observe business etiquette and rules of official conduct, strictly comply with the Anti-Corruption obligation of the teacher and employee of JSC "ALT", the Charter and Internal Regulations of JSC "ALT", other regulatory legal acts of JSC "ALT".

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## 5. RESPONSIBILITIES OF EMPLOYEES OF JSC "ALT" WHEN MAKING MANAGERIAL AND OTHER DECISIONS WITHIN THEIR COMPETENCE

Report to the immediate supervisor on the occurrence of a conflict of interest, personal interest in the performance of official duties, on the inclination to corrupt behavior and receiving gifts.

Not to be guided by personal and selfish interests in the performance of official duties.

Refrain from addressing colleagues and managers with unlawful requests that violate the established order of relations, which may influence their adoption of an impartial official decision.

Not to persuade or encourage other persons to commit corruption offenses.

Not to give gifts to colleagues, managers and other officials and not to provide off-duty services for obtaining property benefits, benefits or advantages using official powers.

In connection with the performance of official duties, do not accept gifts.

Not to use official and other information that is not subject to dissemination in order to obtain or extract property and non-property benefits and advantages.

Refuse to be appointed to a position if it is related to the direct subordination or control of persons who are in close family relations (parents, spouses, brothers, sisters, children).

Be active in countering corruption, uncovering corruption offenses.

Immediately report to the management about the facts of corruption that have become known, as well as about the inclination to receive any benefit for expedited consideration of materials or red tape.

Immediately inform the immediate supervisor in writing about doubts about the legality of the order received for execution.

Contact the higher management if the direct manager himself is involved in a conflict of interests.

To support and demand from colleagues the observance of a high legal and anti-corruption culture.

To take measures on an ongoing basis to eliminate the causes and conditions of possible conflict of interest, corruption offenses and their consequences.

Refrain from representing or lobbying the interests of third parties, as well as performing actions on their behalf.

Not to use official position to influence the activities of colleagues and students in solving issues of an off-duty nature;

Not to force other persons to commit corruption offenses.

To prevent and prevent violations of anti-corruption legislation by subordinates and other officials.

Timely take comprehensive measures to resolve the conflict of interests that colleagues have encountered in the course of their official duties.

Take comprehensive measures to prevent corruption.

Eliminate the causes and conditions that contribute to the commission of corruption offenses, including with subordinates.

Do not allow the involvement, including subordinates and students to perform official or personal tasks.

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### **5.1. RECOMMENDATIONS TO EMPLOYEES OF JSC "ALT" IN THE PROVISION OF SCIENTIFIC, EDUCATIONAL AND OTHER SERVICES**

To take measures on an ongoing basis to improve the quality of the provision of educational, scientific and other socially significant services and to prevent bureaucratic barriers in the system of interaction "JSC "ALT" - teacher – student".

Strive for professionalism, constantly increasing the level of their knowledge, studying domestic and foreign experience and achievements of science.

To serve as an example for others by their professional and universal behavior.

Serve as a personal example of labor discipline for students, respectful and careful attitude to their JSC "ALT", its traditions, history.

Not to abuse their official powers in relation to students, not to allow a biased attitude towards students and subjectivity in assessing their knowledge.

Do not humiliate colleagues and students, use obscene expressions, show familiarity and arrogance.

Not to disseminate false information about the decisions of the administration of JSC "ALT" and the activities of its divisions.

Do not accept gifts or monetary rewards from students. Avoid plagiarism and other academic violations.

Performing their official duties, to show high culture, responsibility, integrity, academic honesty and objectivity, to be guided by the principles of mutual respect, correctness, benevolence in relations with colleagues and students.

### **5.2. RECOMMENDATIONS TO OFFICIALS AND EMPLOYEES OF JSC "ALT" IN THE IMPLEMENTATION OF PUBLIC PROCUREMENT, RELATED TO THE PURCHASE OF GOODS, WORKS, SERVICES**

Optimal and efficient spending of funds used for public procurement.

Providing potential suppliers with equal opportunities to participate in the public procurement procedure, except in cases provided for by Law.

Ensuring fair competition among potential suppliers in accordance with the legislation on public procurement.

Openness and transparency of the public procurement process. To prevent corruption manifestations.

To prevent the participation of close relatives, spouse or relatives of the first managers of this potential supplier and (or) an authorized representative of this potential supplier who have the right to make a decision on the choice of a supplier or who are representatives of the customer or the organizer of public procurement in public procurement.

To prevent participation as a potential supplier and (or) a subcontractor (co-executor) attracted by him who have unfulfilled obligations under enforcement documents and are included in the Unified Register of Debtors.

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### 5.3. FORMATION OF AN ANTI-CORRUPTION CULTURE

The formation of an atmosphere of intolerance to corruption is an activity to strengthen the conviction of all members of the academic community in the need to counteract any unfair practices. The activities of JSC "ALT" are carried out through a set of measures of a general educational, informational and organizational nature, which include:

Implementation of effective anti-corruption technologies and mechanisms in all spheres of activity of the Academy;

Implementation of the Code of Corporate Culture of employees, the Code of Honor of the student;

Conducting purposeful work among the members of the teaching staff to ensure anti-corruption literacy and public understanding of the danger of corruption and its consequences, the formation of persistent anti-corruption immunity, anti-corruption consciousness and anti-corruption culture;

Involvement of students, teachers and staff on the basis of social partnership in the process of preventing corruption;

Implementation of targeted programs for the education of patriotism and active citizenship among students;

Conducting regular anti-corruption monitoring through mass sociological surveys "Academy out of corruption", "Teacher through the eyes of students", "Teacher through the eyes of colleagues", "Student satisfaction assessment", "Clean session", "Support your Academy";

Ensuring broad public access to anti-corruption legal information on the Internet resource of JSC "ALT".

Organization of meetings with representatives of other state bodies and public associations, including the anti-corruption service, with subsequent elaboration of anti-corruption measures.

### 6. ANALYSIS AND UPDATING OF WORKING INSTRUCTIONS

6.1. Updating of this working instruction should be carried out as changes and additions are made to the legislative normative legal acts of the Republic of Kazakhstan and internal regulatory documents of the Academy.

### 7. IDENTIFICATION, ASSESSMENT AND RISK MANAGEMENT

7.1 Identification, assessment and risk management of this RI should be carried out in accordance with DP-ALT-05.

### 8. APPROVAL AND IMPLEMENTATION

8.1 Coordination of this WI is carried out with the RRA, the responsible specialist for ISM.



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## **9. STORAGE, PROTECTION, RECOVERY AND SEIZURE OF DOCUMENTS**

9.1 The responsibility for the transfer of the approved original (original) and the electronic version in Word format of this RI for storage in the DAV is borne by the head of the developer division.

9.2 Storage, protection, restoration and seizure of documents of this WI must be carried out in accordance with DP-ALT-01.

## **10. MAKING CHANGES TO DOCUMENTS**

10.1 Amendments to this RI must be made in accordance with DP-ALT-01.

## **11. ACCESS TO DOCUMENTS. CONFIDENTIALITY**

11.1 Working copies of this WI are stored in electronic form in all departments where activities are carried out, on which the effectiveness of the functioning of documented information depends ISM.

11.2 Access to documents and confidentiality of this WI must be carried out in accordance with DP-ALT-01.