

**JSC compliance
service**

**«ALT University
named after
M.Tynyshpayev»**

Anti-corruption issues Anti-corruption legislation

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**JSC compliance
service**

**«ALT University
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Anti-Corruption Compliance Service

JSC "ALT University named after M. Tynyshpayev" is:

- an independent body, independent from other structural divisions;
- subordinate and accountable to the Board of Directors;
- coordinates and monitors work on compliance with the anti-corruption legislation of the Republic of Kazakhstan, the Code of Corporate Ethics and Labor Discipline, and the Rules of Academic Integrity of the University.

The compliance officer performs the following main functions in his/her activities:

- coordination of work carried out at the University to combat corruption and develop an anti-corruption culture;
- consideration of appeals from employees and students of the University regarding violations of the Charter, Internal Regulations, Anti-Corruption Standard, Code of Honor for Employees and Faculty, and the Code of Academic Honesty for Students;
- ensuring control over the compliance of the University's employees and students with anti-corruption legislation, as well as internal regulatory legal acts: the Anti-Corruption Standard, the Code of Honor for Employees and Faculty, the Code of Academic Integrity for Students;
- participation in the consideration of disciplinary cases of employees, faculty and students of the University to ensure compliance with anti-corruption legislation, as well as the prevention of offenses in the educational sphere, and the prevention of violations of the Internal Rules and the Charter of the University.

What measures are being taken at JSC ALT University named after M. Tynyshpaev to comply with the Law of the Republic of Kazakhstan "On Combating Corruption"

This law applies to both individuals and legal entities, regardless of ownership, throughout the Republic of Kazakhstan. The fight against corruption is a priority for the state, and the law obliges all organizations, including private ones, to take measures to prevent corruption.

- ▣ **Developing and implementing an internal anti-corruption policy** and related regulatory documents.
- ▣ **Creating an atmosphere of intolerance towards corruption** among staff and students (organizing meetings on the topic, holding round tables, through training, outreach, etc.).
- ▣ **Taking measures to prevent and minimize corruption risks** in our activities (e.g., during exam sessions, during training, and when issuing diplomas).
- ▣ **Reporting known facts of corruption offenses** to authorized bodies.
- ▣ **Bearing responsibility** for corruption offenses in accordance with the Criminal Code and the Code of Administrative Offenses of the Republic of Kazakhstan, as well as internal regulatory documents of JSC ALT University named after M. Tynyshpaev.

Article 368. Mediation in bribery

1. Mediation in bribery, that is, assisting the bribe-taker and the bribe-giver in reaching or implementing an agreement between them on receiving and giving a bribe, -

shall be punishable by a fine in the amount of ten to twenty times the amount of the bribe, or by **imprisonment for up to three years**, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.

2. The same act committed repeatedly either by a criminal group or by an individual using his official position,

shall be punishable by a fine in the amount of twenty to thirty times the amount of the bribe, or by imprisonment for up to six years, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.

Article 366. Taking a bribe

1. shall be punishable by a fine in the amount of twenty to fifty times the amount of the bribe, or by **imprisonment for up to five years, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.**

2. Acts committed on a significant scale, as well as the acceptance of a bribe for illegal actions (inaction) –

shall be punishable by a fine in the amount of fifty to sixty times the amount of the bribe, or by imprisonment **for a term of three to seven years, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.**

3. Acts, if committed:

- 1) by extortion;
- 2) by a group of persons by prior conspiracy;
- 3) on a large scale;
- 4) repeatedly, -

shall be punishable by a fine in the amount of sixty to seventy times the amount of the bribe, or by **imprisonment for a term of seven to twelve years, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.**

Статья 366. Получение взятки

3. Деяния, предусмотренные частями первой, 1-1, второй или третьей настоящей статьи, если они совершены преступной группой, а равно в особо крупном размере, -

наказываются штрафом в размере от семидесятикратной до восьмидесятикратной суммы взятки либо лишением свободы **на срок от десяти до пятнадцати лет**, с конфискацией имущества, с пожизненным лишением права занимать определенные должности или заниматься определенной деятельностью.

Article 367. Bribery

1. Giving a bribe personally or through an intermediary -

shall be punishable by a fine in the amount of twenty to thirty times the amount of the bribe, or **by imprisonment for up to five years**, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.

Article 367. Bribery

4. The acts provided for in parts one, two or three of this article, if they are committed **on an especially large scale**

- shall be punishable by a fine in the amount of fifty to sixty times the amount of the bribe, or by imprisonment **for a term of ten to fifteen years**, with confiscation of property, and with lifelong deprivation of the right to hold certain positions or engage in certain activities.

Reporting corruption offences:

1. A person who has information about a corruption offense that is being prepared, committed, or has already been committed shall inform a superior manager and/or the management of the state body or organization of which he/she is an employee, and/or authorized state bodies.

2. A senior manager, the management of a government agency, organization, or authorized government agencies are required to take action on a received report of a corruption offense in accordance with the laws of the Republic of Kazakhstan.

3. A person who reports a fact of corruption or otherwise provides assistance in combating corruption is under the protection of the state and is encouraged in the manner established by the Government of the Republic of Kazakhstan.

(The provisions of this paragraph shall not apply to persons who have knowingly provided false information about a corruption offence, who are subject to liability in accordance with the law).

4. Information about a person providing assistance in combating corruption is a state secret and is provided in accordance with the procedure established by law. Disclosure of such information entails liability established by law.

How is compliance with the Law of the Republic of Kazakhstan "On Combating Corruption" monitored

Monitoring of compliance with legislation in educational institutions is carried out by various government agencies within the limits of their competence:

- **The National Security Committee of the Republic of Kazakhstan (NSC of the Republic of Kazakhstan):** exercises general state control and supervision in the field of combating corruption, conducts external analysis of corruption risks and investigations.
- **The Ministry of Science and Higher Education of the Republic of Kazakhstan (MSHE) and its Committee for Quality Assurance in Education exercise state oversight and supervision in the field of education.** They conduct inspections of compliance with education legislation, including identifying violations related to corruption risks (e.g., in the issuance of diplomas and certification).
- **Prosecutor's offices:** exercise supreme oversight over compliance with the law within the Republic of Kazakhstan by all entities, including private organizations.
- **Law enforcement agencies:** are engaged in the detection, prevention, disclosure and investigation of criminal and administrative corruption offenses.
- **Public oversight:** The public and non-governmental organizations also participate in the development of an anti-corruption culture and can report instances of corruption, facilitating oversight (the nationwide anti-corruption movement "Zhanaru," the "Amanat" party, etc.).

How to report illegal activity?

You can personally contact the Compliance Officer in cases of violation of your academic, official, labor rights, or the occurrence of conflict situations within the team by mobile phone number (WhatsApp number): 8 707 97 97 097 or by corporate e-mail: b.tuletaev@alt.edu.kz, as well as in office No. 202 (*Pedagogical College building*).

☐ **Helpline number: 8 707 97 97 097**

It is recommended to follow the following sequence:

- ☐ Describe the content of the violation and the facts known to you;
- ☐ Please indicate the institute, department or division of the University where the violation occurred;
- ☐ Please state your name (optional);
- ☐ Please provide your contact information for feedback (optional).

Please note that **the substance of your report must clearly state the facts known to you, not baseless suspicions**. We expect your assistance and information regarding actual or planned illegal actions that could lead to an official investigation.



**THANK YOU
FOR YOUR
ATTENTION!!!**