



ALMA
ALMATY MANAGEMENT
UNIVERSITY

Approved by

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1. General provisions

- 1.1. The Anti-Corruption and Bribery Policy of the Educational Institution "Almaty Management University" is a set of established, interrelated principles, procedures, and measures aimed to prevent and fight corruption risks, developing an anti-corruption culture, increasing the trust of students and business partners in the activities of the Educational Institution "Almaty Management University" (hereinafter the University), and other measures in accordance with this Policy.
- 1.2. This Anti-Corruption and Bribery Policy (hereinafter referred to as the Policy) has been developed in accordance with the provisions of the Law of the Republic of Kazakhstan "On Combating Corruption" dated November 18, 2015 No. 410-V, the Anti-Corruption Standard for Ensuring Openness and Transparency in Higher and (or) Postgraduate Education Organizations, approved by the Order of the Minister of Education and Science of the Republic of Kazakhstan dated May 4, 2020 No. 174, and the Methodological Recommendations for Identifying and Resolving Conflicts of Interest in Higher and (or) Postgraduate Education Organizations, approved by the Order of the Minister of Education and Science of the Republic of Kazakhstan No. 161 dated April 24, 2020.

2. Scope of the document

- 2.1. This Policy applies to the University's management, students, and the activities of all University employees, regardless of their position or functions.
- 2.2. The Rector, students, and University employees participating in the procedures defined by this Policy are responsible for compliance with its requirements.
- 2.3. Certain provisions of this Policy apply to other individuals and/or legal entities with whom the University enters to contractual relationships.

3. References

- 3.1. This Policy has been developed in accordance with the following documents:
 - The UN Convention against Corruption - adopted at the plenary meeting of the 58th session of the UN General Assembly on October 31, 2003
 - The UN Declaration against Corruption and Bribery in International Commercial Organizations - approved by General Assembly Resolution 51/191 of December 16, 1996
 - The Concept of Anti-Corruption Policy of the Republic of Kazakhstan for 2022–2026 - approved by Presidential Decree No. 802 of February 2, 2022
 - Law of the Republic of Kazakhstan "On Combating Corruption" No. 410-V of November 18, 2015
 - Anti-Corruption Standard for Ensuring Openness and Transparency in Higher and/or Postgraduate Education Organizations - Order of the Minister of Education and Science of the Republic of Kazakhstan dated May 4, 2020 No. 174
 - Methodological recommendations for identifying and resolving conflicts of interest in higher education institutions - Order of the Minister of Education and Science of the Republic of Kazakhstan No. 161 of April 24, 2020

4. Terms and definitions

Corruption is the abuse of official position, bribery, bribe-giving, bribery, abuse of authority, commercial bribery, or other illegal use by an individual of their official position contrary to the legitimate interests of society and the state in order to obtain a benefit in the form of money, valuables, other property or property-related services, or other property rights for themselves

or third parties, or the illegal provision of such a benefit to the said individual or other individuals. Corruption also includes committing the above acts on behalf of or in the interests of a legal entity

A bribe is the receipt by a University official, personally or through an intermediary, of money, securities, other property, or a benefit in the form of illegal provision of property services, or the granting of other property rights, for actions (inactions) in favor of the bribe-giver or persons represented by him, if such actions (inactions) are within the official's official powers or if he, by virtue of his official position, can facilitate such actions (inactions), as well as for general patronage or connivance in office.

Commercial bribery is the illegal transfer of money, securities, or other property to a person performing managerial functions in a commercial or other organization, the provision of property-related services, or the granting of other property rights in exchange for actions (inactions) in the interests of the giver in connection with the official position held by that person.

Combating bribery and corruption is the activity of the Anti-Corruption University within its powers to prevent corruption, including the formation of an anti-corruption culture in society, the identification, suppression and elimination of the causes and conditions that contribute to the commission of corruption offenses, as well as the identification, suppression, disclosure and investigation of corruption offenses and the elimination of their consequences.

Prevention of bribery and corruption is the University's activity aimed at introducing elements of corporate culture, organizational structure, rules and procedures regulated by internal regulatory documents and ensuring the prevention of corruption offenses.

Senior management is the person or group of persons who directs and manages the organization at the highest level (University President, Rector, Vice-Rectors).

A University employee is an individual who has entered an employment relationship with the Educational Institution "Almaty Management University".

A University business partner (counterparty) is any Kazakhstani or foreign legal entity or individual with whom the University enters into contractual relations, with the exception of employment relations; the concept of a business partner includes (but is not limited to) clients (students, attendees), customers, joint venture partners, consortium partners, outsourcing service providers, contractors, consultants, subcontractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors.

A conflict of interest is a situation in which the business, financial, family, political interests or personal interest (direct or indirect) of a university employee (representative of the University) influences or may influence the proper performance of his or her work (job) duties.

Personal interest is the possibility of receiving income in the form of money, other property, including property rights, property-related services, results of work performed, or any benefits (advantages) by a University employee and/or persons closely related to him/her by marriage (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), citizens or organizations with which the University employee and/or persons closely related to him/her by marriage are connected by property, corporate or other close relations.

An organization is a legal entity regardless of its form of ownership, organizational and legal form, and industry affiliation.

The risk of bribery is the possibility of the emergence of causes and conditions that contribute to the commission of corruption offenses.

PTS – professorial and teaching staff.

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5. Main goals and objectives

- 5.1. The main objectives of the implementation of the anti-corruption and bribery policy at the University are:
 - 5.1.1. ensuring compliance of the University's activities with the requirements of the anti-corruption legislation of the Republic of Kazakhstan.
 - 5.1.2. minimizing the risks of involvement of the University, its employees and students in corrupt activities.
 - 5.1.3. developing a uniform understanding among students and employees of the University of the University's policy of rejection and intolerance of bribery and corruption in any form and manifestation.
 - 5.1.4. Formation of a unified approach to organizing work to prevent corruption at the University.
 - 5.1.5. developing zero tolerance for corruption among students and employees of the University, and a strong immunity against any corrupt practices in the lives of students and employees.
 - 5.1.6. preventing corruption at the University and ensuring accountability for corruption.
 - 5.1.7. anti-corruption monitoring for compliance with the effectiveness of anti-corruption policy measures.
 - 5.1.8. Formation of anti-corruption corporate consciousness.
 - 5.1.9. establishing the obligation of employees and students at the University to know and comply with the principles and requirements of this anti-corruption policy, as well as the key provisions of the applicable anti-corruption legislation of the Republic of Kazakhstan.
- 5.2. To achieve the stated goals, the following objectives for implementing the policy at the University
 - 5.2.1. consolidation of the basic principles of the University anti-corruption activities
 - 5.2.2. determining the scope of application of the Policy and the circle of person covered by it
 - 5.2.3. determining the University officials responsible for the implementation of the University's anti-corruption policy
 - 5.2.4. informing University employees about the regulatory framework for work to prevent corruption and liability for committing corruption offenses
 - 5.2.5. establishing a list of anti-corruption standards and procedures implemented by the University and the procedure for their implementation
 - 5.2.6. development and implementation of measures aimed at preventing and combating corruption at the University
 - 5.2.7. securing the responsibility of senior management and University employees for failure to comply with policy requirements

6. Basic principles of policy

- 6.1. **The principle of compliance** of the University's policy with current legislation and generally accepted legal norms: compliance of the implemented anti-corruption measures with the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption" and other regulatory legal acts that apply to the University. Принцип личного примера.
- 6.2. **Principle of Personal Example.** The University senior management must foster a culture of intolerance to corruption and an ethical standard of zero tolerance for any form or manifestation of bribery at all levels, setting an example through their personal conduct.

- 6.3. **Employee Engagement Principle.** Students, faculty, and University staff are informed of anti-corruption legislation and are actively involved in the development and implementation of anti-corruption standards and procedures, regardless of their position.
- 6.4. **Zero Tolerance Principle.** The University has a zero-tolerance policy toward corruption: any corrupt behavior is strictly prohibited and will result in liability in accordance with legislation and internal regulations.
- 6.5. **Principle of Proportionality of Measures.** The development and implementation of a set of measures to reduce the likelihood of the University, its senior management, executives, and student employees becoming involved in corrupt activities is carried out considering the projected effectiveness of the result and in relation to the risks existing in the University's activities.
- 6.6. **The principle of accountability and inevitability of punishment.** The inevitability of punishment for the University's management, employees, and students, regardless of their position, length of service, or other circumstances, should they commit corruption offenses in connection with their work duty and the Code of Ethics, as well as the responsibility of the University Rector for implementing the University's anti-corruption policy.
- 6.7. **The principle of openness in economic and other activities.** Dissemination of information about the University's anti-corruption policy. This principle includes informing business partners, contractors, and the public about the University's adopted anti-corruption standards and operating procedures and incorporating anti-corruption provisions into contractual relationships.
- 6.8. **Principle of Periodic Risk Assessment and Monitoring.** The University identifies and assesses corruption risks specific to the University's activities as a whole and to its individual divisions and periodically monitors the effectiveness of implemented anti-corruption standards, procedures, and measures, as well as oversee their implementation.

7. Basic measures to prevent corruption offenses

- 7.1. The University's anti-corruption policy consists of developing and implementing comprehensive and consistent measures to prevent and eliminate (minimize) the causes and conditions for the emergence and maintenance of corruption in various areas of the University's activities.
- 7.2. Prevention of corruption offenses at the University is carried out through the application of the following measures:
- 7.2.1. Conducting anti-corruption monitoring. The unit and/or official conducting anti-corruption monitoring is determined by the decision of the University founder
 - 7.2.2. comprehensive application of legal, organizational, personnel, informational, socio-economic and other measures to prevent corruption
 - 7.2.3. development, implementation and enforcement of general ethical principles and rules of corporate conduct for university employees, as well as students and other categories of students, and provision of advisory assistance to subjects of the University's anti-corruption policy on their practical application
 - 7.2.4. implementation of a transparent personnel policy, application of adequate measures of moral and material incentives and motivation of university employees and students for professional growth, consistent with the goals and objectives of the anti-corruption policy
 - 7.2.5. development and implementation of plans for the prevention of corruption offenses
 - 7.2.6. Establishing effective control over the distribution and expenditure of budgetary funds of the University

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- 7.2.7. the use of anti-plagiarism systems in all types of educational, scientific and research activities of the teaching staff and students
- 7.2.8. conducting a legal and anti-corruption analysis of legal acts and (or) their drafts developed at the University
- 7.2.9. anti-corruption educational work;
- 7.2.10. interaction with law enforcement agencies (if necessary)
- 7.2.11. other measures provided for by the legislation of the Republic of Kazakhstan

8. Conclusion

- 8.1. This Policy confirms the University commitment to the principles of combating corruption and bribery.
- 8.2. This Policy also considers the provisions of the University's Sustainable Development Policy.
- 8.3. The implementation of this University Policy presupposes long-term work on a planned basis with the involvement of the necessary participating entities.
- 8.4. The University is open to dialogue and cooperation with national and international stakeholders in the field of anti-corruption activities and countering bribery.