



**INTERNATIONAL EDUCATIONAL  
CORPORATION LLP**

**ANTI-CORRUPTION STANDARD**

**Anti-Corruption Standard  
International Educational Corporation LLP**

**Almaty**



**International Educational Corporation LLP  
Anti-Corruption Standard**

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### 1. General provisions

1. This anti-corruption standard has been developed in accordance with Article 10 of the Law of the Republic of Kazakhstan "On Combating Corruption" and represents a system of prohibitions, restrictions, and permissions in all areas of activity of the International Educational Corporation LLP (hereinafter referred to as IEC LLP).

2. The purpose of the anti-corruption standard is to prevent corruption, increase legal literacy, and ensure zero tolerance for corruption in the activities of IEC LLP.

3. The objectives of the anti-corruption standard are:

1) to foster sustainable anti-corruption behavior and responsibility among the administration, faculty, and employees of IEC LLP in the performance of their functional duties;

2) timely detection of corruption and prevention of its negative consequences;

3) improving the efficiency of IEC LLP's activities.

4. Application and enforcement of the anti-corruption standard:

1) The anti-corruption standard is applied in the activities of IEC LLP in the exercise of its functions and the realization of its rights and legitimate interests.

2) The anti-corruption standard is mandatory for IEC LLP employees.

3) Each employee of IEC LLP is personally responsible for the application and implementation of the anti-corruption standard.

5. The anti-corruption standard defines the actions and decisions of University employees aimed at strict compliance with established rules and the prevention of corruption in their activities.

6. The Provost is responsible for monitoring compliance with the anti-corruption standard by employees of IEC LLP.

### 2. Terms and abbreviations

1. Corruption is the abuse of official position, giving bribes, receiving bribes, 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 benefits in the form of money, valuables, other property or services of a property nature, other property rights for oneself or third parties, or the illegal provision of such benefits to the specified person or other individuals. Corruption also includes the commission of the above acts on behalf of or in the interests of a legal entity.

2. A bribe is the receipt by an official of IEC LLP, personally or through an intermediary, of money, securities, other property, or benefits in the form of illegal provision of property services, provision of other property rights for the performance of actions (omissions) in favor of the bribe giver or persons represented by them, if such actions (omissions) fall within the official powers of the official or if, by virtue



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of their official position, they can contribute to such actions (omissions), as well as for general patronage or connivance in the service.

3. 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 to such a person, or the granting of other property rights for the performance of actions (omissions) in the interests of the giver in connection with the official position held by that person.

4. Countering bribery and corruption — the activities of IEC LLP to counter corruption within the limits of its powers to prevent corruption, including the formation of an anti-corruption culture in society, the identification, suppressing and eliminating the causes and conditions that contribute to the commission of corruption offences, as well as identifying, suppressing, disclosing and investigating corruption offences and eliminating their consequences.

5. Prevention of bribery and corruption - the activities of IEC LLP aimed at introducing elements of corporate culture, organizational structure, rules, and procedures regulated by internal regulatory documents and ensuring the prevention of corruption offenses.

6. Senior management - a person or group of persons who direct and manage the organization at the highest level (Rector, Vice-Rectors).

7. IEC LLP employee - a natural person who has entered into an employment relationship with IEC LLP.

8. Business partner of IEC LLP (counterparty) - any legal entity or individual with whom IEC LLP enters into a contractual relationship, except for employment relationships.

9. Conflict of interest is a situation in which the business, financial, family, political interests or personal interests (direct or indirect) of an employee of IEC LLP influence or may influence the proper performance of their employment (job) duties.

10. Personal interest is the possibility of receiving income in the form of money, other property, including property rights, property-related services, the results of work performed, or any benefits (advantages) by an employee of IEC LLP.

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

12. Risk of bribery - the possibility of the emergence of causes and conditions conducive to the commission of corruption offences.

### **3. Rules of conduct for employees of IEC LLP working in the field of education**

1.1. Prohibitions, restrictions, and permissions:

1. When performing their official duties, employees:

1) when exercising their official powers, not to accept any material benefits, services, or other privileges related to the performance of their duties;



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- 2) avoid conflicts of interest and, if they arise, take measures to eliminate them in accordance with the legislation of the Republic of Kazakhstan;
- 3) not use their official position in the performance of their functional duties for the purpose of obtaining benefits for themselves or third parties;
- 4) not to use their official position to influence the activities of organizations of all types, their employees, and other persons in resolving personal matters;
- 5) not to use official and other information that is not subject to official distribution for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 6) comply with business etiquette and rules of official conduct when performing their official duties.

### **4. When preparing and making decisions within their competence**

1. Report to their immediate supervisor any conflicts of interest, personal interests in the performance of their official duties, inclination toward corrupt behavior, and receipt of gifts.
2. Do not be guided by personal and selfish interests in the performance of official duties.
3. Refrain from making unlawful requests to colleagues that violate established procedures and may influence their impartial official decisions.
4. Do not induce or encourage others to commit corruption offences.
5. Do not give gifts to colleagues or other persons, and do not provide non-official services in order to obtain property benefits, advantages, or privileges using your official authority.
6. Do not use official or other information that is not subject to disclosure for the purpose of obtaining or extracting property and non-property benefits and advantages.
7. Be active in combating corruption and exposing corruption offences.
8. Immediately report to management any known facts of corruption, as well as any attempts to obtain any benefit for expedited consideration of materials or red tape.
9. Immediately notify your immediate supervisor in writing of any doubts about the legality of an order received for execution.
10. Contact senior management if your immediate supervisor is involved in a conflict of interest.
11. Support and demand that colleagues adhere to a high legal and anti-corruption culture.
12. Take ongoing measures to eliminate the causes and conditions of potential conflicts of interest, corruption offenses, and their consequences.
13. Refrain from assisting anyone in carrying out business or other activities related to the extraction of income.
14. Refrain from representing or lobbying for the interests of third parties, as well as from acting on their behalf.



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### **5. When providing educational services and public services, employees of IEC LLP are recommended to:**

1. Take measures on an ongoing basis to improve the quality of educational services.
2. Not to allow red tape when considering applications for and providing services to individuals and legal entities.
3. Refrain from entering into non-official relationships with applicants based on the nature of their written requests.
4. Report management in inclination to commit a corruption offense.
5. Minimize direct contact with applicants for educational services.

### **6. When selecting and assigning employees, it is recommended to:**

1. When appointing to a higher position, be guided by the principle of meritocracy and personnel policy.
2. Comply with the requirements of current anti-corruption legislation.
3. When hiring employees at IEC LLP, explain the main duties, prohibitions, and restrictions imposed on employees.
4. Prevent the unjustified transfer of employees' personal data.
5. Objectively and comprehensively conduct internal investigations into employees of IEC LLP.
6. Not to demand or ask IEC LLP employees to provide any personal services.

### **7. Building an anti-corruption culture**

1. Creating an atmosphere of intolerance towards corruption involves activities aimed at strengthening employees' conviction in the need to combat corruption through the prism of a value system that is universally recognized in society:

- 1) developing a sense of patriotism;
- 2) love for loved ones;
- 3) respect for the older generation;
- 4) respect for the national traditions of the peoples living in Kazakhstan;
- 5) knowledge of the history of one's country;

2. The activities of IEC LLP are carried out through a set of general educational, informational, and organizational measures, which include:

1) collective viewing and discussion of video materials (films) containing episodes of officials being caught red-handed while receiving bribes;

2) organizing meetings with representatives of other organizations,



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government agencies, and public associations, including the anti-corruption service, followed by the development of measures to combat corruption;

3) holding sports and other leisure activities.

3. Instilling in IEC LLP employees an intolerance for any misconduct involving corruption, even the most insignificant. At the same time, the main emphasis should be placed on the inevitability of punishment, treating the incident as extraordinary, with collective discussion and the development of preventive measures to prevent it from happening again.

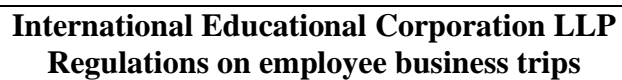
### **8. Personal responsibility of the director, vice-rectors, and employees for organizing work aimed at combating and preventing corruption**

In accordance with Article 22 of the Law of the Republic of Kazakhstan "On Combating Corruption," all state bodies, organizations, quasi-state entities, and officials are obliged to combat corruption within their competence.

The effectiveness of measures aimed at combating and preventing corruption largely depends on the principled position of the head and employees of IEC LLP, which should be characterized by consistency and continuity of action.

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## 7. INFORMATION SHEET

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