



**Anti-Corruption Policy
of the autonomous organization of education Nazarbayev University**

Category: Policy

Approval Date: 08.07.2026

Effective Date: 08.07.2026

Level of Access: Open to Public

Classification Number: 8.10.1 STAFF

Approving Authority: Managing Council

Registration Number: 08.07.26

Owner: Office of Compliance

Revision Date: 01.06.2029

Applicability: NU and its organizations

Retired Documents:

Title:

Date:

Registration Number:

Approving Authority:



Section 1. Purpose and Application

1.1. The autonomous organization of education Nazarbayev University (hereinafter “NU” or “University”) strives to ensure high standards of ethics and values applied to research, teaching, and operational activities, as well as to implement and enforce effective systems to combat corruption and bribery.

1.2. NU undertakes to conduct its activities in accordance with ethical standards and laws of the Republic of Kazakhstan in the field of combating corruption and bribery based on the following basic principles:

- 1) zero tolerance for any manifestations of corruption and bribery in any form;
- 2) prevention of conflicts of interest in order to avoid situations where personal interests of individual may conflict with the interests of the University;
- 3) inevitability of punishment regardless of the position held, length of service, and other conditions of the employee;
- 4) legality of compliance with this Policy with the legislation of the Republic of Kazakhstan and generally accepted standards.

1.3. The purpose of the Anti-Corruption Policy of the autonomous organization of education Nazarbayev University (hereinafter the “Policy”) is to:

- 1) define the duties and responsibilities of members of the NU community with regard to complying with and supporting NU position on bribery and corruption; and;
- 2) provide information and guidance on how to recognize and address issues related to bribery and corruption.

1.4. This Policy applies to all members of the NU community and third parties. The Policy applies to all activities of the University, whether related to its research, teaching, operating or other activities, and exists for the protection of the interests of members of the University and its community.

1.5. The University will expect any person or organization performing services for it or on its behalf, to adhere to this Policy or otherwise have equivalent procedures in place to prevent corruption and bribery.

1.6. The basic principles set out in this Policy also apply to the University's organizations and must be reflected in their internal documents aimed at combating corruption and bribery.

Section 2. Terms / Definitions

2.1. Definitions used in this Policy are as follows:

- 1) **corruption** – illegal use by persons holding a responsible civil service position, persons authorized to perform public functions, persons equated to persons authorized to perform public functions, officials of their official powers (powers of office) and related opportunities to obtain or derive, personally or through intermediaries, material (non-material) benefits and advantages for themselves or third parties, as well as bribery of the said persons through benefits and advantages provided to them;



2) **bribery** – an inducement or reward that can be ‘financial or other advantage’ (including but not limited to money, contracts, gifts or offers of employment) which is offered, promised, or given in order to gain commercial, contractual, business or personal advantage. The act of being bribed is defined as requesting, accepting, or agreeing to accept such an advantage, in exchange for improperly performing such a function or activity;

3) **members of the NU community** – University employees, individuals providing works / rendering services to the University under a civil contract, students of all programs and applicants;

4) **third parties** – contractors, suppliers, consultants and others who perform services for the University or on its behalf, wherever located in the world, and others who represent the University (except for individuals providing works / rendering services to the University under a civil contract);

5) **gift** – anything of value, including, but not limited to, money, gift cards, gratuities, commissions, rebates, loans, loan guarantees, payment of debts, transportation, use of property, entertainment, hospitality, travel, internships (paid or unpaid), employment opportunities, admission opportunities, goods, or services.

The aforementioned definitions should be used only in the context of this Policy.

Section 3. Main Provisions

3.1 Obligations under the Policy and Applicable Law

3.1.1. NU does not tolerate bribery or corruption of any kind. It is the policy of NU to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining any advantage.

More specifically, members of the NU Community may not directly or indirectly:

1) make, approve, authorize, or offer to give to anyone anything of value (including but not limited to cash payments) for the purpose of improperly inducing the recipient to take (or to refrain from taking) an action that would grant a benefit on NU or NU community member; or

2) receive or accept anything of value (including but not limited to cash payments), if such item of value is intended to induce or reward improper performance of one’s responsibilities or duties or to gain an improper advantage.

Non-exhaustive list of examples of improper behavior are included in Annex 1 to the Policy.

3.1.2. Members of the NU Community should not take any actions for the purpose of evading the requirements of this Policy, including by acting through third party to do anything that is forbidden by this Policy.

3.1.3. All members of the NU community are required to comply with the Law of the Republic of Kazakhstan “On Combating Corruption” dated 18 November 2015. This law is mandatory for all persons in the Kazakhstan and must be strictly observed without exception. Compliance with anti-corruption legislation is an obligation and a matter of personal responsibility of NU community member.



Adherence to the law is also of critical importance to the University. It ensures integrity, transparency, and the protection of the University's reputation.

3.1.4. All NU employees are required to complete training under this Policy. Employees shall confirm in writing (including through the designated electronic system) that they have read and agree to comply with this Policy.

3.2. Third Parties

3.2.1. In order to minimize the corruption and compliance risk of entering into business relationships with counterparties and persons acting on behalf of the University, the University may conduct due diligence on their integrity and reliability.

Such due diligence shall be carried out by Compliance office using appropriate comprehensive screening services in the following cases: when entering into major transactions or transactions involving a conflict of interest; for expenditure contracts exceeding 2500 MCI; upon instruction of management; as well as when reviewing structural divisions identify potential risks.

3.2.2. Agreements concluded by the University must contain anti-corruption clauses (except for the impossibility of including a clause based on the reasonable demands of the counterparty).

Example of the clause is in Annex 2 to this Policy.

The inclusion of an anti-corruption clause helps maintain trust between the parties and prevent corruption and bribery, both at the stage of concluding the contract and throughout its performance. The initiator of the agreement must ensure that such or a corresponding clause is present in the agreement.

3.3. Gifts and Hospitality

3.3.1. Members of the NU community shall not directly or indirectly offer, give, request, or accept any gift, benefit, or service that is intended to influence, or could reasonably be perceived as influencing, the performance of their official duties or the exercise of their professional judgment.

3.3.2. Gifts may be given or accepted only if all of the following conditions are met:

- 1) the gift is not cash and cannot be exchanged for cash;
- 2) the value of the gift does not exceed 10 MCI;
- 3) the gift is neither given nor accepted in exchange for any service, benefit, decision, or preferential treatment;
- 4) the gift is given or accepted publicly on behalf of the department/University/group on the occasion of national or state holidays, birthdays or other generally accepted significant events, provided that the provision or acceptance of such a gift is not prohibited by applicable law and is not intended to influence the decision-making of the recipient or create obligations for the recipient.

3.3.3. Hospitality (including meals, travel, accommodation, or event invitations) must not constitute a concealed reward for any service, favoritism, granting of rights, or decision related to a transaction, agreement, nor may it be intended to improperly influence the recipient. Hospitality must be reasonable,



proportionate, appropriate in the circumstances, and must not create reputational risk for NU if publicly disclosed. All representation expenses must be provided in compliance with the relevant internal documents and policies of the University.

3.3.4. In case of doubt regarding the permissibility of any gift or hospitality under this Policy, member of the NU community can consult the Compliance office.

3.4. Facilitating Payments

3.4.1. Members of the NU community are strictly prohibited from offering, authorizing, making, or accepting facilitating payments. For the purposes of this Policy, a facilitating payment is any payment made to secure, expedite ordinary procedures. Such payments are prohibited regardless of their amount. Facilitating payments are distinct from officially established and publicly disclosed service fees that are lawfully payable to an organization in accordance with applicable legislation and relevant procedures.

3.5 Reporting and Investigation

3.5.1 Members of the NU Community should report immediately any suspected or actual violations of this Policy or anti-corruption laws.

Reports are made by submitting form provided in Annex 3 to the emails of the Compliance office. Reports should be made in good faith with the presentation of all supporting information and materials. Submitting knowingly false or malicious allegations is prohibited and may result in appropriate measures.

If NU community members are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the University's Compliance office employees.

3.5.2 All reports submitted under this Policy shall be treated with strict confidentiality. Information concerning the identity of the reporting person, the subject of the report, and any related materials will be disclosed strictly on a need-to-know basis and only to individuals authorized to review and handle the matter.

3.5.3. NU is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place, or may take place in the future.

3.5.4. Upon receipt of a report submitted and where sufficient grounds exist, the matter may be referred for further internal investigation. The purpose of such investigation is to establish the relevant facts, assess potential violations, and determine appropriate corrective or disciplinary measures (including termination of contracts and referral of materials to the relevant authorized state authorities, as well as improvement of control procedures).

All investigations shall be conducted in accordance with the internal document on conducting internal investigations.

NU reserves the right not to conduct a review of anonymous reports concerning alleged corruption or bribery in particular if such a report does not contain sufficient



information, verifiable facts, or supporting materials necessary to properly assess and verify the allegations.

3.6. Consequences of Violation

3.6.1. Any violation of this Policy shall constitute grounds for disciplinary action in accordance with the NU's internal regulations, employment or other relevant contracts, and applicable legislation.

3.6.2. Violation of applicable anti-corruption requirements may result in administrative, or criminal liability under applicable laws.

Section 4. Waiver

4.1. Not Applicable.

Section 5. Temporary Provision

5.1. Not Applicable.

Section 6. Revision

6.1. This Policy shall be reviewed within three years after its approval and revised if necessary.

Section 7. Related Documents

7.1. Policy and Procedure on Conflict of Interest of the autonomous organization of education Nazarbayev University.



Annex 1
to the Anti-Corruption
Policy of the autonomous
organization of education
Nazarbayev University

Non-exhaustive list of examples of improper behavior

Example 1 – Procurement Process

A University employee involved in the procurement process is responsible for evaluating bids for an ongoing tender. During the procurement process, a potential supplier offers the staff member an all-expenses-paid trip, luxury accommodation, or other personal benefits. The staff member accepts the offer and, as a result, gives preferential treatment to the supplier by adjusting scoring criteria, sharing confidential bid information, or recommending the supplier despite lower compliance or higher costs. Accepting or acting on such benefits is strictly prohibited under this Policy.

Example 2 – Admissions Process

A University employee involved in the admissions process is approached by a relative of an applicant who offers a gift in exchange for confidential information, such as candidate rankings and interview results. The employee agrees and shares restricted information, provides advance access to test questions, or gives targeted guidance on exam sections to help the applicant succeed. The employee may also manipulate internal scoring or recommendation procedures to secure the applicant's admission. Accepting or acting on such offers is strictly prohibited under this Policy.

Example 3– Recruitment Process

A staff member involved in the recruitment process for a University position manipulates the hiring process to favor a specific candidate. The staff member shares confidential interview questions in advance, influences other panel members, or adjusts evaluation scores, and in return receives monetary payments, expensive gifts, or promises of future business opportunities. Accepting or acting on such offers is strictly prohibited under this Policy.

Example 4 – Contract Approval

A University staff member who initiates a contract with external vendor is offered facilitating payments. In exchange, the staff member expedites the contract approval process, signs off on preliminary agreements without completing required due diligence, or skips formal internal reviews. Accepting or acting on such payments is strictly prohibited under this Policy.

Example 5 – Student Assessment

During the examination period, a student presents a professor with a high-value gift, such as a new smartphone, under the pretext of appreciation. The professor accepts the gift. Subsequently, the professor awards the student a higher grade than warranted by their actual academic performance.



Such conduct constitutes a violation of the this Policy, as it involves accepting an improper benefit and compromising academic integrity. Accepting or acting on such benefits is strictly prohibited under this Policy.

Example 6 – Faculty Evaluation

A professor undergoing annual performance evaluation invites a member of the evaluation committee to an exclusive fine-dining restaurant and covers all expenses for dinner. Following this hospitality, the committee member provides a more favorable evaluation than justified by the professor's actual performance.

Such conduct constitutes a violation of the University's anti-corruption policy, as it involves providing and accepting improper hospitality intended to influence an official decision, thereby undermining objectivity and fairness. Accepting or acting on such benefits is strictly prohibited under this Policy.



Annex 2
to the Anti-Corruption
Policy of the autonomous
organization of education
Nazarbayev University

**Example of an anti-corruption clause
for inclusion in contracts concluded by the University**

For the purposes of preventing corruption and eliminating the risk of the Parties' involvement in corrupt activities, the Parties shall use reasonable efforts to minimize the risk of entering into business relationships with counterparties that may be involved in corrupt and bribery activities, and shall provide mutual assistance to each other in combating corruption and bribery.

In performing their obligations under this Agreement, the Parties undertake to comply with and ensure that their employees comply with the requirements of the legislation of the Republic of Kazakhstan and University internal document on combating corruption and bribery.

The Parties shall ensure that their employees and representatives undertake:
not to commit corruption offenses as provided for by the legislation of the Republic of Kazakhstan, applicable international instruments;
not to take any actions aimed at obtaining undue advantages in the performance of this Agreement.

Each Party undertakes to take reasonable measures to prevent corruption offenses and bribery, including exercising control over the actions of its employees and engaged persons.

Each Party declares that it has no conflict of interest with respect to the execution of this Agreement and agrees to promptly inform the other Party in the event that such a situation should arise during execution thereof.

In the event of discovering facts of a breach of this clause, a Party shall promptly notify the other Party in writing.

Upon confirmation of a violation of anti-corruption obligations, the other Party shall have the right to:

- unilaterally terminate the Agreement;
- claim compensation for losses caused by such violation.

A breach of this clause shall be deemed a material breach of the Agreement.



Annex 3
to the Anti-Corruption
Policy of the autonomous
organization of education
Nazarbayev University

Report Form

1.	Personal information
	Full name:
	Position/status:
	Department/School/Office:
2.	Contact information <i>(Please note that NU will use this information while consideration of the report is underway)</i>
	Email address:
	Telephone No:
3.	Information /Report summary
1)	Please set out the details, including dates of key events, locations and names of persons involved.
2)	Additional information
4.	Declaration I hereby confirm that the information above is true to the best of my knowledge and belief. I understand that the persons, mentioned above will be made aware of the contents of this Report form and will be able to comment on them as part of investigation

Signed:

Date:

*When you have completed all sections, please send it via email along with any supporting documents to compliance_office@nu.edu.kz (with subsequent provision of hard copies of all documents).

