

“APPROVED”

**By decision of the Board of Directors
Non-profit Joint Stock Company
“M.Kh. Dulaty Taraz University”**

Minutes No. _____

Dated “__” _____ 2025

**REGULATION
on the Compliance Officer
of the Non-Commercial Joint Stock Company
“Dulaty University”**

Taraz, 2025

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1. General Provisions

1. This *Regulation on the Compliance Officer* (hereinafter – the *Regulation*) of the Non-Commercial Joint Stock Company “**Taraz University named after M.H. Dulaty**” (hereinafter – the *University*) has been developed in accordance with paragraph 3 of Article 16 of the **Law of the Republic of Kazakhstan “On Combating Corruption”** (hereinafter – the *Law*), as well as the *Model Regulation on Anti-Corruption Compliance Services in Quasi-Public Sector Entities*, approved by Order No. 112 of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan dated **March 31, 2023**.
2. This Regulation defines the **goals, objectives, principles, functions, powers, independence, and protection guarantees**, as well as the **responsibility** of the Compliance Officer. It also establishes the main qualification requirements, the procedure for appointment and disciplinary measures, and the interaction procedure between the Compliance Officer, the Board of Directors, the University, and other organizations.
3. This Regulation shall be published on the official website of the University and made available to all employees.
4. The following key terms are used in this Regulation:
 1. **Anti-corruption compliance** – a function aimed at ensuring that quasi-public sector entities and their employees comply with the anti-corruption legislation of the Republic of Kazakhstan;
 2. **Internal corruption risk analysis** – identification and study of causes and conditions contributing to the commission of corruption offenses;
 3. **Conflict of interest** – a contradiction between personal interests of individuals holding responsible public positions, persons authorized to perform public functions or equated thereto, officials, and their official powers, where personal interests may lead to non-performance or improper performance of official duties;
 4. **Corruption offense** – an unlawful, culpable act (action or inaction) with signs of corruption, for which administrative or criminal liability is established by law;
 5. **Corruption risk** – the possibility of the emergence of causes and conditions contributing to the commission of corruption offenses;
 6. **Corruption prevention** – activities of anti-corruption entities aimed at studying, identifying, limiting, and eliminating causes and conditions conducive to corruption through the development and implementation of preventive measures;
 7. **Authorized anti-corruption body** – a state body responsible for forming and implementing the anti-corruption policy of the Republic of Kazakhstan, coordinating anti-corruption efforts, as well as preventing, detecting,

suppressing, uncovering, and investigating corruption offenses, including its territorial divisions.

5. If the Law “On Combating Corruption” or the **international standard ISO 37001:2025** on Anti-Bribery Management Systems establishes requirements or approaches to the Compliance Officer not provided for in this Regulation, such requirements and approaches shall be approved by the Board of Directors.

2. Goals and Objectives of the Compliance Officer

6. The main goal of the Compliance Officer’s activities is to ensure the University’s and its employees’ compliance with the anti-corruption legislation of the Republic of Kazakhstan, as well as to monitor the implementation of anti-corruption measures.
7. The tasks of the Compliance Officer include:
 1. ensuring the implementation of tools for preventing and mitigating corruption offenses by the University and its employees;
 2. ensuring the effective implementation of the University’s anti-corruption measures;
 3. ensuring the conduct of internal corruption risk analysis within the University;
 4. ensuring compliance with external regulatory requirements and best international practices in combating corruption;
 5. ensuring adherence to the fundamental principles of anti-corruption as established by the Law.

3. Principles

8. When implementing and exercising the functions of the Compliance Officer, the University shall be guided by the following principles:
 1. **Sufficiency of powers and resources** allocated for the performance of the Compliance Officer’s functions;
 2. **Commitment of leadership** to the effectiveness of the Compliance Officer;
 3. **Information transparency** of the Compliance Officer’s activities;
 4. **Independence** of the Compliance Officer;
 5. **Continuity** in the implementation of anti-corruption compliance activities;
 6. **Continuous improvement** of the anti-corruption compliance system;
 7. **Ongoing professional development** and competency enhancement of the Compliance Officer.

4. Functions of the Compliance Officer

9. The Compliance Officer shall perform the following functions:
 1. Based on the Law “On Combating Corruption” and the international standard ISO 37001:2025 “*Anti-Bribery Management Systems – Requirements and Guidance for Use*”, the Compliance Officer ensures the development of:
 - the University’s **Internal Anti-Corruption Policy**;
 - **Anti-Corruption Instructions** for employees;
 - an **Internal Policy on Identification and Resolution of Conflicts of Interest**;
 - an **Anti-Corruption Standard** in accordance with anti-corruption legislation;
 - an **Internal Action Plan on Anti-Corruption Measures**;
 - a **document regulating the procedure for reporting by employees** of facts or possible violations of anti-corruption legislation;
 - a **document regulating issues of corporate ethics and conduct**.
 2. Collects, processes, summarizes, analyzes, and evaluates information regarding the effectiveness of the University’s anti-corruption policy.
 3. Coordinates the conduct of **internal corruption risk analysis** within the University in accordance with the *Model Rules for Conducting Internal Analysis of Corruption Risks* approved by Order No. 12 of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service and Anti-Corruption dated 19 October 2016 (registered under No. 14441).
 4. Participates in **external corruption risk analyses** conducted jointly by the heads of the authorized anti-corruption body and the University.
 5. Carries out **monitoring of identified corruption risks** and of measures taken for their mitigation and elimination.
 6. Conducts **informational and awareness-raising activities** on anti-corruption issues and the formation of an anti-corruption culture within the University.
 7. Organizes **anti-corruption training seminars** for employees.
 8. Ensures **compliance by employees** with the anti-corruption policy and corporate ethics and conduct rules.
 9. Promotes the formation of a **culture of ethical relations** consistent with generally accepted moral and ethical standards within the University community.
 10. Ensures that persons equated to public officials **comply with financial control and anti-corruption restrictions** as established by law, within the scope of the Compliance Officer’s competence.
 11. Develops and monitors the implementation by structural divisions of the University’s internal anti-corruption action plan.

12. Takes measures to **identify, monitor and resolve conflicts of interest**, including in employment, procurement and business processes of the University.
 13. Implements measures to regulate **the giving and receiving of gifts** within the University.
 14. Conducts **comprehensive due-diligence checks of counterparties**.
 15. Carries out or participates in **official investigations** based on reports (complaints) regarding corruption facts within the University.
 16. Monitors and analyzes **changes in anti-corruption legislation** and judicial practice on corruption-related cases relevant to the University.
 17. Assesses the **effectiveness of anti-corruption measures** implemented by structural divisions and employees of the University.
 18. Hears reports from structural divisions and employees on issues of combating corruption.
 19. Submits recommendations to the **Chairman of the Management Board – Rector** of the University on eliminating identified corruption risks and improving the efficiency of internal processes.
 20. Depending on the University's specific activities, performs functions related to **compliance, business ethics and sustainable development**, provided these functions do not affect independence or create a conflict of interest.
 21. Cooperates with the **authorized anti-corruption body**, government agencies, quasi-public sector entities, public associations, and other legal and natural persons.
10. Documents and requests issued by the Compliance Officer to other structural divisions, departments, and organizations on matters within the Compliance Officer's competence shall be signed by the Compliance Officer.

5. Powers of the Compliance Officer

11. Within the scope of his or her activities, the Compliance Officer shall:
1. Request and receive from the University's structural units any information and materials, including those containing commercial or official secrets;
 2. Have full access to view and analyze information in all information systems and databases used by the University (such as *Platonus*, *Documentolog*, the public procurement portal, etc.);
 3. Initiate submission of matters within his/her competence for consideration by the Board of Directors;
 4. Conduct official inspections based on reports of potential corruption offenses or violations of the Law of the Republic of Kazakhstan "On Combating Corruption";
 5. Require written explanations from managers and other employees of the University within the framework of internal investigations;

6. Develop proposals for improving the anti-corruption legislation of the Republic of Kazakhstan and submit them to the authorized anti-corruption body;
7. Participate in the drafting of internal documents within his/her competence;
8. Submit proposals to management on the application of disciplinary measures;
9. Establish channels for employees to report actual or potential violations of anti-corruption laws within the University, as well as to propose measures for improving anti-corruption efforts;
10. Request and utilize financial and organizational resources necessary to perform compliance functions, and participate in the formulation of the University's budget section on "Anti-Corruption Activities";
11. Organize and conduct training sessions for staff, faculty, and students on anti-corruption, academic integrity, and compliance matters; develop and implement methodological materials, instructions, and guidelines; and provide consultations on conflict-of-interest prevention and ethical behavior;
12. Suspend transactions, tender procedures, appointments, personnel decisions, and other actions until the completion of verification, if there are reasonable suspicions of corruption; initiate extraordinary audits or inspections of specific operations;
13. Conduct regular and unscheduled monitoring of corruption risks across all structural divisions, verify compliance with the University's Anti-Corruption Policy and internal regulations, and organize and maintain registers of risks, appeals, internal investigations, and corrective measures.

6. Appointment and Dismissal of the Compliance Officer

12. The Compliance Officer shall be appointed to and dismissed from office by decision of the Board of Directors, on a competitive basis, or may be temporarily appointed with a probationary period during which specific tasks are assigned that serve as the basis for final confirmation. The employment contract with the Compliance Officer shall be concluded in accordance with the labor legislation of the Republic of Kazakhstan.
13. The Board of Directors shall determine the term of office, remuneration, working conditions, and performance evaluation of the Compliance Officer.
14. Social support, guarantees, and compensation payments for the Compliance Officer shall be provided in accordance with the labor legislation of the Republic of Kazakhstan.
15. The official duties, rights, and responsibilities of the Compliance Officer shall be defined by the job description (Appendix 2) and this Regulation, and approved in the prescribed manner.
16. Methodological support to the Compliance Officer shall be provided by the authorized anti-corruption body and its territorial departments.

17. The Compliance Officer shall not combine his or her duties with those of other structural divisions of the University.

7. Independence and Protection Guarantees of the Compliance Officer

18. The Compliance Officer performs his or her duties independently from the executive body and University officials, reports directly to the Board of Directors, and acts autonomously in ensuring compliance with the laws of the Republic of Kazakhstan on combating corruption.
19. Any interference with the Compliance Officer's work, obstruction of his/her duties, provocation, or attempts to influence decisions are prohibited. The Compliance Officer shall not be subjected to pressure, disciplinary sanctions, or dismissal without the prior consent of the Board of Directors. In case of pressure or threats, the Compliance Officer has the right to report directly to the Board of Directors or the authorized anti-corruption body.

8. Duties of the Compliance Officer

20. In performing their duties, the Compliance Officer shall:

1. Maintain confidentiality of information about the Organization and its affiliated entities, as well as insider information obtained during the performance of anti-corruption compliance functions, except when such information concerns planned or committed corruption offenses;
2. Ensure the confidentiality of individuals who report alleged or actual instances of corruption, violations of the corporate Code of Ethics, or other internal documents on anti-corruption within the Organization, and take measures to prevent any reprisals against employees who report such violations;
3. Promptly inform the Board of Directors of any situations involving actual or potential violations of anti-corruption legislation;
4. Notify the authorized anti-corruption agency of any known cases of planned, ongoing, or committed corruption offenses;
5. Not obstruct the established operational procedures of the Organization;
6. Adhere to service and professional ethics.

21. The Compliance Officer shall not:

1. Participate in audits or investigations of processes in which they were directly involved during the preceding three years;
2. Engage in activities that could impair, or be perceived as impairing, their impartiality in conducting audits or investigations;
3. Use confidential information for personal gain;
4. Breach professional or business ethics;

5. Accept gifts or benefits that could compromise, or be perceived as compromising, the Compliance Officer's independence, objectivity, or impartiality;
6. Participate in inspections, investigations, or other activities that may lead to a conflict of interest.

9. Qualification Requirements

22. The Compliance Officer must possess:

1. A higher (or postgraduate) education and at least three years of experience in the fields of anti-corruption or compliance, or a higher (or postgraduate) education with specialized training in anti-corruption compliance and at least three years of professional experience relevant to the Organization's profile;
2. Knowledge of the legislation of the Republic of Kazakhstan and the fundamentals of corporate governance;
3. Understanding of regulatory and legal acts of the Republic of Kazakhstan, including those related to anti-corruption policy;
Proficiency in the state and foreign language(s) is preferred.

23. The Compliance Officer must continuously enhance their professional qualifications by participating in training programs organized by authorized agencies and professional compliance organizations.

10. Interaction with Departments and the Board of Directors

24. Interaction between the Compliance Officer and the Organization's departments shall be based on mutual respect and professional courtesy.

25. The Organization's management shall:

1. Facilitate an effective environment for the Compliance Officer's work, supporting the achievement of their objectives, tasks, functions, and responsibilities, and ensuring the exercise of their rights;
2. Provide administrative (organizational and technical) support for the Compliance Officer's activities, including the necessary tools, assets, and resources — such as access to information systems, databases, and other goods, works, or services;
3. Provide opportunities for the Compliance Officer's professional training and certification in compliance-related areas, including social and communication skills development.

26. Employees of the Organization's departments shall assist the Compliance Officer by:

1. Providing documents and information necessary to perform the Compliance Officer's functions and tasks, considering the provisions of subparagraph 1) of paragraph 12 of this Regulation;
2. Objectively discussing identified risks and violations;
3. Cooperatively resolving issues and problems as they arise.

11. Reporting by the Compliance Officer

27. The Compliance Officer shall submit quarterly reports on anti-corruption measures implemented in the Organization to the authorized anti-corruption agency. Additional information may be provided upon request of the authorized agency.

28. Annually, by **December 25** of the year preceding the planned period, the Compliance Officer shall submit to the Board of Directors an **annual work plan** for the following year. The Compliance Officer shall ensure the implementation of the approved plan and report on its execution within the established timelines.

29. The Compliance Officer shall submit activity reports to the Board of Directors according to the following schedule:

1. **Semiannual reports** – no later than the 25th day of the second month following the reporting period;
2. **Annual report** – no later than the 25th day of the second month following the reporting year.

30. Reports prepared by the Compliance Officer based on internal investigations that identify corruption risks or unlawful acts (or omissions) of the Organization's employees must be submitted to the Board of Directors within **15 working days** after completion of the investigation.

31. The Board of Directors shall review the Compliance Officer's reports and make decisions within its authority.

32. If potential corruption offenses by the Organization's management are detected, the Compliance Officer shall refer the matter to authorized state bodies in accordance with paragraph 1 of Article 24 of the Law.

12. Responsibility of the Compliance Officer

33. The Compliance Officer bears responsibility for the quality and timeliness of performing the functions and tasks assigned to them in accordance with the legislation of the Republic of Kazakhstan, the employment contract, and the job description.

13. Performance Evaluation and Incentives

34. The incentive bonus for the Compliance Officer is determined based on an evaluation of performance effectiveness for the reporting period, using a point-based system. The assessment is conducted according to the following criteria:
- Identified and documented violations or corruption risks — **1 point** for each confirmed case;
 - Conducted training events (seminars, lectures, workshops) — **1 point** per event;
 - Preparation of analytical reports, memoranda, proposals, and conclusions implemented in practice — **1 point** per document;
 - Initiative in introducing new compliance control tools (systems, processes, regulations) — **2 points** for each implemented initiative;
 - Participation in internal investigations with preparation of final reports — **2 points** per investigation;
 - Results of internal and external audits — absence of significant nonconformities or timely correction of identified deficiencies — **4 points**;
 - Conducting internal analysis of corruption risks and preparing final reports — **2 points** per structural unit;
 - Completion of the annual work plan without delays — up to **5 points** (as determined by management);
 - Participation in university working groups, commissions, and initiatives — **0.5 points** for each participation.
35. The total number of points accumulated for the reporting period determines the level of incentive payment and the overall effectiveness of the Compliance Officer's work. The final assessment is formalized as a **Performance Evaluation Table** and signed by the **Chairman of the Board – Rector**.
36. The amount of the incentive payment is determined by the **Chairman of the Board – Rector** based on the submitted justification and summary score table.
37. The incentive payment for the Compliance Officer is initiated by the **Chairman of the Board – Rector** and reviewed at a meeting of the **Board of Directors**. The Board of Directors makes the final decision on granting the bonus based on the implementation of the annual plan and overall performance results. The total annual amount of such bonuses shall not exceed **six (6) monthly salaries**.
38. Additional bonuses to the Compliance Officer for national holidays may be granted during the year by order of the **Chairman of the Board – Rector** or an acting officer. The total annual amount of such bonuses shall not exceed

ten (10) minimum monthly wages established by the legislation of the Republic of Kazakhstan on the republican budget for the corresponding fiscal year.

39. In cases of systematic violations, failure to perform key tasks, non-compliance with deadlines, or lack of significant results, bonuses may be withheld or reduced.

14. Final Provisions

40. This Regulation shall enter into force upon approval by the **Board of Directors** of the Organization.
41. Amendments and additions to this Regulation shall be made by decision of the **Board of Directors**.
42. In the event of inconsistencies between certain provisions of this Regulation and current legislation, the norms of the **legislation of the Republic of Kazakhstan** shall prevail.

Code of Ethics of the Compliance Officer
of the NAO “Dulati University”

Principles

The Compliance Officer shall adhere to the following principles:

1. Integrity

Integrity of the Compliance Officer is the foundation upon which trust in their professional judgment is built.

2. Objectivity

The Compliance Officer demonstrates the highest level of professional objectivity in the performance of duties. They make balanced assessments of all relevant circumstances and remain free from influence by personal interests or those of others.

3. Confidentiality

The Compliance Officer respects the proprietary rights to the information obtained in the course of their work and does not disclose such information without proper authority, except where disclosure is required by legal or professional obligations.

4. Professional Competence

The Compliance Officer applies the knowledge, skills, and experience necessary to provide effective services aimed at preventing corruption risks.

Rules of Conduct

1. Integrity

The Compliance Officer:

- 1.1) Must perform their duties honestly, conscientiously, and responsibly.
- 1.2) Must act in accordance with the law and disclose relevant information when required by legal or professional standards.
- 1.3) Must not knowingly engage in actions or activities that could discredit the profession of Compliance Officer or the organization.

1.4) Must respect the lawful and ethical objectives of the organization and contribute to their achievement.

2. Objectivity

The Compliance Officer:

2.1) Must not engage in any activity that could impair or appear to impair impartiality, including actions or relationships that conflict with the organization's interests.

2.2) Must not accept gifts or benefits that could compromise or appear to compromise professional judgment.

2.3) Must disclose all material facts known to them that, if not disclosed, could distort the results of audits or internal investigations.

3. Confidentiality

The Compliance Officer:

3.1) Must exercise due care and prudence in using and safeguarding information obtained during the performance of duties.

3.2) Must not use information for personal gain or in any way that contradicts the law or may harm the lawful and ethical objectives of the organization.

4. Professional Competence

The Compliance Officer:

4.1) Must accept only those assignments for which they possess adequate professional knowledge, skills, and experience.

4.2) Must provide services related to identifying and preventing corruption risks in accordance with anti-corruption standards and the organization's internal policies.

4.3) Must continuously enhance professional competence, as well as the efficiency and quality of provided services.

Appendix 2
to the Regulation on the Compliance Officer
of the NAO “Dulati University”

Job Description

of the Compliance Officer
of the Non-Commercial Joint Stock Company
“Dulaty University”

1. General Provisions

1. This Job Description of the Compliance Officer (hereinafter — “CO”, “the Company”) of the Non-Commercial Joint Stock Company “Dulaty University” has been developed in accordance with the legislation of the Republic of Kazakhstan and the Regulation on the Compliance Officer.
2. The CO is appointed to and dismissed from the position by the decision of the Board of Directors of the Company upon the recommendation of the Chairman of the Management Board — Rector of the Company.
3. Oversight of the CO’s activities shall be carried out by the Board of Directors of the Company.
4. The employment contract with the CO shall be concluded and terminated by the Chairman of the Management Board — Rector of the Company based on the decision of the Board of Directors and in accordance with the labor legislation of the Republic of Kazakhstan.
5. The vacation schedule, leave request, and vacation order of the CO shall be approved by the Chairman of the Management Board — Rector of the Company in accordance with the labor legislation of the Republic of Kazakhstan.
6. In his/her professional activities, the CO shall be guided by the legislation of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan “On Combating Corruption” (hereinafter — the “Law”), the Corporate Governance Code of the Company, the Regulation on the CO, and this Job Description.

2. Qualification Requirements

7. The CO must possess:
 1. Higher (or postgraduate) education and at least 3 years of experience in the field of anti-corruption or compliance, or higher (or postgraduate) education,

- specialized training in anti-corruption compliance, and at least 3 years of experience in the profile of the organization's activities;
2. Knowledge of the legislation of the Republic of Kazakhstan and the fundamentals of corporate governance;
 3. Knowledge of regulatory legal acts of the Republic of Kazakhstan, including those related to anti-corruption policy.
- Proficiency in the state and foreign language(s) is also preferred.

3. Job Responsibilities

8. The CO performs the following functions:
 1. Ensures the development of:
 - the Company's internal anti-corruption policy;
 - anti-corruption guidelines for employees;
 - the Company's internal policy on identifying and resolving conflicts of interest;
 - the Company's anti-corruption standard, in accordance with the legislation on combating corruption;
 - the Company's internal plan of anti-corruption measures;
 - a document regulating the procedure for employees to report actual or potential violations of anti-corruption legislation;
 - a document regulating corporate ethics and conduct.
 2. Collects, processes, summarizes, analyzes, and evaluates information regarding the effectiveness of the Company's anti-corruption policy.
 3. Coordinates internal corruption risk analyses in accordance with the Model Rules for Conducting Internal Corruption Risk Analysis, approved by Order No. 12 of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Combating Corruption dated 19 October 2016 (registered under No. 14441 in the State Register of Regulatory Legal Acts).
 4. Participates in external corruption risk analyses conducted jointly with the authorized anti-corruption body.
 5. Monitors identified corruption risks within the Company and the measures taken for their mitigation and elimination.
 6. Conducts explanatory activities on anti-corruption issues and promotes the formation of an anti-corruption culture within the Company.
 7. Organizes anti-corruption training seminars for Company employees.
 8. Ensures control over compliance with the anti-corruption policy and corporate ethics standards by Company employees.
 9. Promotes the development of an ethical and respectful corporate culture within the Company.

- 10.Ensures that persons equated to public officials observe financial control measures and anti-corruption restrictions established by the Law, within the CO's competence.
- 11.Develops and monitors the implementation of internal anti-corruption action plans by structural divisions of the Company.
- 12.Takes measures to identify, monitor, and resolve conflicts of interest, including those related to employment, procurement, and business processes.
- 13.Regulates issues related to the giving and receiving of gifts within the Company.
- 14.Conducts comprehensive due diligence of counterparties.
- 15.Carries out or participates in internal investigations based on reports (complaints) of corruption.
- 16.Monitors and analyzes changes in anti-corruption legislation and relevant judicial practices.
- 17.Evaluates the effectiveness of anti-corruption measures implemented by divisions and employees.
- 18.Hears reports from Company divisions and employees on anti-corruption issues.
- 19.Submits recommendations to the Chairman of the Management Board — Rector on eliminating identified corruption risks and improving internal management processes.
- 20.Depending on the Company's specifics, performs functions related to compliance, business ethics, and sustainable development, provided they do not compromise independence or create conflicts of interest.
- 21.Cooperates with the authorized anti-corruption body, government authorities, quasi-public sector entities, public associations, and other legal and natural persons.

4. Rights and Authorities

9. The CO is vested with the following rights and authorities:
 1. Access to personnel, production and other facilities, all documentation, and any other information requested in connection with internal investigations and audits, including commercial and official secrets.
 2. Passive access (view-only) to accounting and other internal databases and information systems, without modification rights.
 3. Requesting and obtaining materials, including draft documents submitted for approval to the General Meeting of Shareholders, the Board of Directors, and other governing bodies, and obtaining copies of their decisions.

4. Exchanging information and coordinating activities with other internal and external assurance and consulting functions to ensure adequate coverage and avoid duplication.
5. Engaging employees of structural divisions and external experts for specialized consultations and analyses.
6. Conducting consultations and sending written inquiries to government agencies, other legal entities, and Company divisions on issues within the CO's competence.
7. Participating in the development and implementation of the Company's programs and projects within the CO's authority and in compliance with applicable standards.
8. Taking part in meetings and events held by the Company related to internal control, risk management, and corporate governance improvements.
9. Directly contacting the Chairman and members of the Board of Directors, as well as the Chairman of the Management Board — Rector, on issues concerning the CO's activities.
10. Submitting proposals to the Board of Directors regarding term of office, work procedures, remuneration, and incentive conditions of the CO.
11. Initiating meetings of the Board of Directors and/or its Committees on matters within the CO's competence.
12. Exercising other rights and powers provided by the Company's internal control system and making decisions within the CO's competence.

6. Responsibility

10. The CO shall be responsible for:
 1. Diligent performance of duties as defined by this Job Description and the employment contract;
 2. Compliance with the laws and internal regulations of the Republic of Kazakhstan governing the CO's activities;
 3. Adherence to the principles and requirements of anti-corruption legislation;
 4. Timely and complete fulfillment of assignments and specific instructions of the Board of Directors;
 5. Ensuring proper confidentiality and safeguarding of financial, official, and commercial secrets;
 6. Any material or other damage caused to the Company;
 7. Observance of labor discipline.