

ANALYTICAL REPORT
on the results of the internal analysis of corruption risks
in the activities of NPJSC «Abylkas Saginov Karaganda Technical
University» for 2024

Karaganda

June 25, 2025

Under the coordination of the anticorruption compliance service, the working group conducted an internal analysis of corruption risks in the activities of the non-profit joint-stock company «Abylkas Saginov Karaganda Technical University» in accordance with the Law of the Republic of Kazakhstan «On combating corruption», the model rules for conducting an internal analysis of corruption risks, approved by the order of the chairman of the agency of the Republic of Kazakhstan for civil service affairs and anticorruption dated October 19, 2016 No. 12, Methodological recommendations for conducting an internal analysis of corruption risks, approved by the order of the chairman of the agency of the Republic of Kazakhstan for combating corruption dated December 30, 2022 No. 488 and other regulatory acts.

Name of the object of internal analysis of corruption risks:

Non-profit joint-stock company «Abylkas Saginov Karaganda Technical University» (hereinafter referred to as NPJSC).

The basis for conducting an internal analysis of corruption risks:

Order of the Chairman of the Board - Rector of the NPJSC «Abylkas Saginov Karaganda Technical University» dated April 21, 2025 No. 116 lsk «On conducting an internal analysis of corruption risks in the non-profit joint-stock company «Abylkas Saginov Karaganda Technical University» (**Appendix 1**).

The analyzed period of activity of NPJSC:

from January 1 to December 31, 2024.

Internal analysis of corruption risks was carried out in the following areas:

- 1) identification of corruption risks in regulatory legal acts affecting the activities of NPJSC;
- 2) identification of corruption risks in the organizational and managerial activities of the NPJSC.

Identification of corruption risks in internal legal acts regulating the activities of NPJSC:

The NPJSC carries out its activities in accordance with the Laws of the Republic of Kazakhstan «On education», «On state property», «On joint-stock

companies», «On non - commercial organizations» and other regulatory legal acts, as well as the charter and internal legal acts.

During the analysis, a set of measures was carried out aimed at studying the Charter and internal legal acts regulating the activities of the NPJSC for compliance with subparagraph 1) of article 4 of the Law of the Republic of Kazakhstan «On combating corruption» and other regulatory legal acts, as well as the presence of discretionary powers and provisions that contribute to the commission of corruption offenses (**Appendix 2**).

No discrepancies were found.

1. Personnel management, including the identification of positions subject to corruption risks:

Human resources management:

1) In accordance with the labor code of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan «On education», the model rules for the activities of higher and (or) postgraduate education organizations, approved by the order of the Minister of education and science of the Republic of Kazakhstan dated October 30, 2018 No. 595, the order of the Minister of science and higher education of the Republic of Kazakhstan dated January 5, 2024 No. 4 «On approval of qualification requirements for the educational activities of organizations providing higher and (or) postgraduate education, and the list of documents confirming compliance with them», NPJSC develops, approves and ensures compliance with the rules for competitive replacement of positions of teaching staff and research workers.

Recommendation 1.

In the documented procedure «Personnel management», in section «8. Selection of new personnel», the description of the appointment of educational, support and service personnel must be supplemented with a full description of the appointment of the candidate for the position in the event that more than one applicant is involved.

In order to increase the transparency and efficiency of the process, as well as to eliminate the possibility of abuse in the selection of educational, support and service personnel.

2) In accordance with subparagraphs 4), 6) of article 1 of the Law of the Republic of Kazakhstan «On combating corruption», a list of positions subject to corruption risks has been defined (**Appendix 3**).

2. Conflict of interest resolution:

No conflicts of interest have been identified in relation to core activities, including administrative and management issues.

3. Delivery of public services:

In 2024, 4,329 public services were provided, including the following types of public services:

«Acceptance of documents and enrollment in higher and (or) postgraduate education organizations for training in higher education programs» – 2403;

«Acceptance of documents and enrollment in higher and (or) postgraduate education organizations for training in postgraduate education programs» – 274;

«The deadline for submitting documents for participation in the competition for studying abroad within the framework of academic mobility is 47»;

«Provision of dormitory accommodation for students in higher and (or) postgraduate education institutions» – 1451;

«Issuance of duplicate documents on higher and postgraduate education» - 140;

«Provision of free meals to certain categories of citizens, as well as persons under guardianship (trusteeship) and patronage, students and pupils of higher education organizations» – 14;

«Updating (correcting) information on documents on higher and postgraduate education» – 0.

One justified refusal to provide the public service «Issuance of duplicate documents on higher and postgraduate education».

The student services center provides four government services:

1. Provision of dormitory accommodation for students in higher and/or postgraduate education institutions.

2. Issuance of duplicate documents on higher and postgraduate education.

3. Provision of free meals to certain categories of citizens, as well as persons under guardianship (trusteeship) and patronage, students and pupils of higher education organizations.

4. Updating (correcting) information about documents on higher and postgraduate education.

The center for international cooperation and academic mobility provides one state service: accepting documents for participation in the competition for study abroad within the framework of academic mobility.

The admissions committee provides two government services:

1. Acceptance of documents and enrollment in higher and/or postgraduate education institutions for training in higher education programs.

2. Acceptance of documents and enrollment in higher and/or postgraduate education institutions for training in postgraduate education programs.

No violations of anticorruption legislation in the provision of public services were identified.

4. Implementation of permitting functions:

In accordance with subparagraph 3) of article 3 of the Law of the Republic of Kazakhstan «On permits and notifications», subparagraph 25) of paragraph 1 of article 4 of the administrative procedure code of the Republic of Kazakhstan, NPJSC is not a government agency and does not exercise permitting functions.

5. Implementation of control and audit functions:

In accordance with the decisions of the Board of Directors of NPJSC dated July 31, 2023 (minutes No. 3), October 2, 2024 (minutes No. 7), the annual plan of the internal audit service of NPJSC is being implemented.

Quarterly and annual reports are submitted within the established deadlines and within the limits of existing authority.

6. Development and distribution of budgetary and financial resources:

According to the rules for the development, approval of development plans for state-controlled joint-stock companies and limited liability partnerships, state enterprises, monitoring and evaluation of their implementation, as well as the development and submission of reports on their implementation (hereinafter referred to as the rules), approved by order of the Minister of national economy of the Republic of Kazakhstan dated February 14, 2019 No. 14, the procedure for the development, approval of development plans for state-controlled joint-stock companies is determined.

In accordance with paragraph 9 of the rules, the development plan of the organization is developed by the executive body of the organization, the trustee once every five-year period in accordance with the goals and objectives set out in the development plan of the state body, the development plan of the region, city of republican significance, the capital.

Thus, by virtue of the decision of the board of directors dated December 22, 2020 (minutes No. 4), the NPJSC development Plan for 2020-2024 was approved; on November 29, 2023 (minutes No. 7), the corresponding clarifications were made.

Information on income and expenses for 2024:

income	10 531 899 thousand tenge;
expenses	9 916 541 thousand tenge;
profit	615 358 thousand tenge.

According to the audit report of LLP «Center-audit S&M» (agreement No. 250179-00 dated March 14, 2025), the financial statements reflect reliable and objective information about the financial position of NPJSC.

7. Conclusion of contracts with individuals and legal entities:

1) Appendices 38-43 of the rules for the implementation of Public procurement (hereinafter referred to as the rules) approved by order of the Minister of finance of the Republic of Kazakhstan dated October 9, 2024 No. 687 define standard public procurement contracts.

By virtue of subparagraph 18) of article 1 of the Law of the Republic of Kazakhstan «On legal acts», the said Rules establish a legal norm, which is essentially a generally binding rule of conduct of a permanent or temporary nature, designed for repeated application, extending to an individually indefinite circle of persons within the framework of regulated social relations.

Due to the above circumstances, public procurement agreements are concluded by NPJSC in accordance with the requirements established in the regulatory legal act.

2) Agreements for the implementation of scientific, scientific-technical projects and programs, projects for the commercialization of the results of scientific

and (or) scientific-technical activities are developed by the authorized body in the field of science.

3) Employment contracts are developed on the basis of and in accordance with article 28 of the labor code of the Republic of Kazakhstan.

4) Agreements for the provision of educational services on a paid basis and for the provision of additional educational services using credit technology for education on a paid basis, as well as civil law agreements, are concluded in accordance with the norms of civil legislation.

Recommendation 2.

In this case, for agreements for the provision of educational services on a paid basis and for the provision of additional educational services using credit technology for education on a paid basis, as well as civil law agreements, the introduction of a single digital Register.

The specified digital Registry will facilitate document management, increase the efficiency of working with agreements, ensure their safety and quick search, and eliminate negative issues.

8. Development and operation of information systems:

NPJSC is based on the principles of openness and transparency in information systems, while at the same time striving to improve digital processes.

The following tasks are implemented within the framework of the processes being carried out:

1) regular updating of information systems, taking into account advanced technologies and standards, which certainly contributes to the formation of transparency and efficiency;

2) data accessibility - optimization of the structure of information systems in order to ensure optimal access;

3) training and feedback - organizing training events for users;

4) Data protection and privacy - compliance with security standards and ensuring privacy.

Recommendation 3.

Ensure the implementation of the information security operations center (ISOC) for the purpose of monitoring and protecting against cyber threats, as well as timely response to information security incidents, which will allow for the timely identification and prevention of negative consequences, and as a result, reduce the risks of unauthorized access to data.

9. Other issues arising from organizational and managerial activities:

In accordance with the provision on the implementation of monitoring of the implementation of scientific, scientific and technical projects and programs, projects for the commercialization of the results of scientific and (or) scientific and technical activities at the stages of their implementation and completion, approved by the order of the acting Minister of science and higher education of the Republic of Kazakhstan dated December 27, 2024 No. 600, the monitoring group generates a document to notify the authorized body, industry body and NSC about the identified

facts of violation of the points of the competition documentation, failure to achieve the set results, termination of funding, reduction of funding or refund of funds, in order to ensure transparency, economic efficiency and effectiveness of scientific research.

Recommendation 4.

In order to exclude failure to perform work and misuse of budget funds for accepted obligations under contracts for scientific, scientific and technical projects and programs, projects for the commercialization of the results of scientific and (or) scientific and technical activities, in the regulations on the department of science and innovation, as well as in the job descriptions of employees, describe the procedure for monitoring the implementation of the declared results in accordance with the calendar plan of the contract and other results provided for in the specified regulatory legal act.

The assessment of identified risks based on the results of the internal analysis of corruption is presented in Appendix 4.

The agreement sheet with the structural divisions of the NPJSC is in Appendix 5.

Recommendations 5 and 6 are designated according to the assessment of the identified risks based on the results of the internal analysis of corruption risks and are reflected in the action plan to eliminate the causes and conditions that contribute to the commission of corruption offenses identified based on the results of the internal analysis of corruption risks.

In order to exclude violations of the anticorruption legislation of the Republic of Kazakhstan in the activities of NPJSC:

1. Analytical report on the internal analysis of corruption risks in the activities of NPJSC:

- 1) agree with the structural divisions of the NPJSC;
- 2) place it on your own Internet resource.
2. develop a plan to eliminate the identified deficiencies.
3. Take other measures arising from this Analytical report on the internal analysis of corruption risks in the activities of the NPJSC.