

**ANALYTICAL REPORT**  
**on the results of the internal analysis of corruption risks**  
**in the activities of Abylkas Saginov**  
**Karaganda Technical University NJSC for 2025**

**Karaganda**

**June 26, 2026**

Under the coordination of the anti-corruption compliance service, a working group conducted an internal analysis of corruption risks within the operations of " Non-Profit Joint-Stock Company Abylkas Saginov Karaganda Technical University, in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption," the Standard Rules for Conducting the Internal Analysis of Corruption Risks (approved by Order No. 12 of Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016), the Methodological Recommendations for Conducting the Internal Analysis of Corruption Risks (approved by Order No. 488 of Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan dated December 30, 2022), and the other regulatory legal acts.

**Name of the entity subject to internal corruption risk analysis:**

Non-Profit Joint-Stock Company Abylkas Saginov Karaganda Technical University (hereinafter NJSC).

**Basis for conducting the internal analysis of corruption risks:**

Order No. 172 of Chairman of the Board, Rector of A. Saginov Karaganda Technical University NJSC dated May 15, 2026, "On Conducting an Internal Analysis of Corruption Risks at Non-Profit Joint-Stock Company A. Saginov Karaganda Technical University (**Appendix 1**).

**Period of the NJSC's activities subject to analysis:**

From January 1 to December 31, 2025.

**The internal analysis of corruption risks was conducted in the following areas:**

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

**Identification of corruption risks in internal regulatory legal acts affecting the activities of NJSC**

NJSC conducts its activities in accordance with the Laws of the Republic of Kazakhstan "On Education," "On State Property," "On Joint-Stock Companies," and "On Non-Profit Organizations," as well as the other regulatory legal acts, its Charter, and internal legal acts.

The analysis involved a comprehensive review of the Charter and internal legal acts governing NJSC's activities to assess their compliance with Subparagraph 1) of

Article 4 of the Law of the Republic of Kazakhstan "On Combating Corruption" and the other regulatory legal acts, and to identify any discretionary powers or provisions conducive to corrupt practices (**Appendix 2**).

**No discrepancies have been identified.**

## **1. Personnel management, including the identification of positions susceptible to corruption risks**

### **Personnel management**

1) In accordance with the Labor Code of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Education", the Standard Rules for the Activities of Higher and/or Postgraduate Education Organizations (approved by Order No. 595 of the Minister of Education and Science of the Republic of Kazakhstan dated October 30, 2018), and Order No. 4 of the Minister of Science and Higher Education of the Republic of Kazakhstan dated January 5, 2024 ("On Approval of Qualification Requirements for Educational Activities of Organizations Providing Higher and/or Postgraduate Education and the List of Documents Confirming Compliance Therewith"), Non-Profit Joint-Stock Company (NJSC) develops, approves, and ensures compliance with rules for the competitive filling of academic and research staff positions.

When recruiting educational support and service personnel, equal access to employment and prevention of discrimination are ensured in accordance with the documented "Personnel Management" procedure.

### **Recommendation 1.**

**In accordance with the Law of the Republic of Kazakhstan No. 311-VIII dated June 12, 2026, "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan Regarding Anti-Corruption Measures", to ensure the development of a personal interest declaration document.**

2) In accordance with subparagraphs 4) and 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 Resolution of conflicts of interest**

**No conflicts of interest have been identified regarding core activities, including those of an administrative or managerial nature.**

## **3 Provision of state services**

In 2025, the total of 4,872 public services were rendered, broken down by service category as follows:

- "Acceptance of documents and enrollment in higher and/or postgraduate education institutions for higher education programs" – 2,808;
- "Acceptance of documents and enrollment in higher and/or postgraduate education institutions for postgraduate education programs" – 329;

- "Acceptance of documents for participation in the selection process for study abroad under academic mobility programs" – 28;
- "Provision of dormitory accommodation to students at higher and/or postgraduate education institutions" – 1,537;
- "Issuance of duplicate higher and postgraduate education documents" – 163;
- "Provision of free meals to specific categories of citizens, as well as to individuals under guardianship, trusteeship, or patronage who are students or wards of higher education institutions" – 11;
- "Updating (amending) data regarding higher and postgraduate education documents" – 0.

During the reporting period, one substantiated refusal was issued regarding the public service "Issuance of duplicate higher and postgraduate education documents" processed via the "Government for Citizens" State Corporation. The refusal was based on the fact that the submitted power of attorney was no longer legally valid due to the expiration of its term.

The Student Service Center provides four public services:

1. Provision of dormitory accommodation to students enrolled in higher and/or postgraduate education institutions.
2. Issuance of duplicate higher and postgraduate education documents.
3. Provision of free meals to specific categories of citizens, as well as to individuals under guardianship, trusteeship, or patronage who are students or wards of higher education institutions.
4. Updating (amending) information regarding higher and postgraduate education documents.

The Department of International Cooperation provides one public service: Acceptance of documents for participation in the selection process for study abroad under academic mobility programs.

The Admissions Office provides two public services:

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

**No violations of anti-corruption legislation in the provision of state services have been identified.**

#### **4. Implementation of authorization functions**

In accordance with subparagraph 3) of Article 3 of the Law of the Republic of Kazakhstan "On Permits and Notifications" and subparagraph 25) of paragraph 1 of Article 4 of the Administrative Procedural Code of the Republic of Kazakhstan, **NJSC is not a state body and does not exercise authorization functions.**

#### **5. Implementation of control and audit functions**

The Annual Work Plan of the Company Internal Audit Service for 2025 was approved by the decision of the Board of Directors dated December 27, 2024 (Minutes No. 13).

In 2025, the Internal Audit Service submitted quarterly and annual reports within the established timeframes, in accordance with the Annual Audit Plan approved by the Board of Directors and within the scope of its established authority.

**6. Utilization and allocation of budgetary and financial funds**

The Development Plan of NJSC for 2025–2029 was approved on December 24, 2024 (Minutes No. 12).

On June 25, 2025 (Minutes No. 5) and December 25, 2025 (Minutes No. 9), the Board of Directors approved semi-annual revisions to the Company Development Plan for 2025–2029 for the first and second halves of 2025, respectively.

Information of the income and expenses for 2025:

Income:	12,467,451
Expenses:	11,672,263
Profit:	795,188

According to the audit report issued by the ARIP Consulting Group LLP (State Procurement Contract for Services No. 000240004524/260080/00 dated April 2, 2026), the financial statements fairly present, in all the material respects, the financial position of NJSC as of December 31, 2025, as well as its financial performance and cash flows for the year ended on that date, in accordance with International Financial Reporting Standards (IFRS) and the reporting formats approved by Order No. 404 of the Ministry of Finance of the Republic of Kazakhstan dated June 28, 2017.

**7. Conclusion of contracts with individuals and legal entities**

No violations of anti-corruption legislation have been identified.

**8. Development and operation of information systems**

NJSC operates based on the principles of openness and transparency regarding information systems while simultaneously striving to improve digital processes. To ensure openness and transparency, an information system for the allocation of dormitory places was developed for 2025.

**Recommendation 2.**

**To address the fundamental objective of transparency in public procurement and to eliminate any document manipulation, ensure the implementation of an information system for tracking tender applications.**

**9. Other matters arising from organizational and management activities**

Overall, NJSC’s academic activities comply with the regulatory legal acts of the Republic of Kazakhstan governing higher education. The processes for developing and updating educational programs and organizing the educational process are carried out to the required extent. A comprehensive set of measures is being implemented to improve the quality of educational services provided. In accordance with the NJSC Academic Policy, student academic achievements are recorded during knowledge assessments in the disciplines studied and are evaluated using a point-rating letter-grade system. The entry of grades into the electronic gradebook and the administration

of all forms of assessment (ongoing, interim, and final) are conducted in accordance with the course syllabus.

**Recommendation 3.**

**To ensure compliance with the labor legislation of the Republic of Kazakhstan and other regulatory legal acts regarding amendments and additions introduced in 2026, the regulation on the teaching workload of the academic staff must be amended to incorporate specific workload distribution criteria for the purpose of workload calculation and remuneration.**

**\*An assessment of the risks identified through the internal analysis of corruption risks is presented in Appendix 4.**

**The approval sheet involving the structural units of NJSC is provided in Appendix 5.**

**Recommendations 4 and 5 have been formulated based on the assessment of risks identified through the internal analysis of corruption risks and are reflected in the Action Plan to Eliminate the Causes and Conditions Conducive to Corruption-Related Offenses Identified During the Internal Analysis of Corruption Risks.**

To prevent violations of the anti-corruption legislation of the Republic of Kazakhstan in the NJSC’s activities:

- 1. The analytical report on the internal analysis of corruption risks in the NJSC’s activities shall be:
  - 1) coordinated with the structural units of NJSC;
  - 2) published on its own website.
- 2. To develop a plan to rectify the identified deficiencies.
- 3. To take other measures arising from this analytical report on the internal analysis of corruption risks in NJSC’s activities.

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