



“APPROVED”
Rector of JSC “SKMA”
Zh. Seitizhanova
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**REGULATION
ON THE ACTIVITIES OF THE COMPLIANCE OFFICER**

R 336– 2026

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Shymkent

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1. Developed and implemented by the Compliance Officer.
 2. Approved by the decision of the Quality Council of JSC “SKMA”.
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1. GENERAL PROVISIONS

1.1 This Regulation on the Activities of the Compliance Officer (hereinafter referred to as the **Regulation**) has been developed in accordance with the Law of the Republic of Kazakhstan “On Combating Corruption”, Order No. 143 of the Chairperson of the Agency of the Republic of Kazakhstan for Civil Service Affairs dated August 10, 2026 “On Approval of the Standard Regulation on Anti-Corruption Compliance Services”, and the Charter of the Joint Stock Company “South Kazakhstan Medical Academy” (hereinafter referred to as the **Academy**), and constitutes an internal regulatory document defining the status of the Compliance Officer and establishing the tasks, functions, powers, rights and duties, responsibility and organizational procedures of the Compliance Officer at the Academy.

1.2 This Regulation defines the status of the Compliance Officer, his/her tasks, functions, powers, rights and duties, responsibility, as well as the procedure for his/her interaction with the Board of Directors, the management of the Academy, structural divisions, employees, students of the Academy and other organizations.

1.3 This Regulation applies to the Compliance Officer, all officials, employees and students of the Academy, as well as third parties – counterparties within the framework of contractual relations.

1.4 This Regulation serves as a guide for the Compliance Officer in carrying out his/her activities.

1.5 The Compliance Officer shall be appointed by a decision of the Board of Directors of the Academy and shall be a permanent employee whose primary purpose and activity are to ensure compliance by the Academy, its employees and students with the legislation of the Republic of Kazakhstan on combating corruption, monitor the implementation of anti-corruption measures, and ensure compliance with ethical standards and the principles of academic integrity at the Academy.

1.6 The Compliance Officer shall be appointed to and dismissed from office by a decision of the Board of Directors of the Academy through the conclusion of an employment contract in accordance with the Labour Code of the Republic of Kazakhstan.

1.7 The staffing level of the Compliance Officer position (number of positions) shall be approved by the Rector of the Academy in coordination with the Board of Directors.

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1.8 The main areas of activity, functional duties, rights and responsibility of the Compliance Officer shall be determined by the job description and approved by the Rector of the Academy.

1.9 The activities of the Compliance Officer shall be carried out in accordance with a work plan containing a list of activities and their deadlines, which shall be approved by the Rector of the Academy.

1.10 In order to properly perform the tasks and functions of the Compliance Officer and ensure the objective and independent nature of his/her activities, the Compliance Officer shall be independent from the influence of any persons when performing the tasks and functions assigned to him/her.

1.11 The Compliance Officer shall be impartial and unbiased in his/her work and shall prevent conflicts of interest from arising.

1.12 In his/her activities, the Compliance Officer shall be guided by the regulatory legal acts of the Republic of Kazakhstan and the internal regulatory documents of the Academy.

1.13 Methodological and informational support to the Compliance Officer shall be provided by the authorized anti-corruption body.

1.14 This Regulation shall be posted on the official website of the Academy and brought to the attention of all employees and students of the Academy.

2. REFERENCES TO REGULATORY DOCUMENTS

This Regulation has been developed taking into account the requirements of the following regulatory documents:

1) Law of the Republic of Kazakhstan “On Education” dated July 27, 2007 No. 319, as amended and supplemented.

2) Law of the Republic of Kazakhstan “On Combating Corruption” dated November 18, 2015 No. 410-V, as amended and supplemented.

3) Labour Code of the Republic of Kazakhstan dated November 23, 2015 No. 414-V, as amended and supplemented.

4) Order No. 143 of the Chairperson of the Agency of the Republic of Kazakhstan for Civil Service Affairs dated August 10, 2026.

5) Order No. 553 of the Minister of Labour and Social Protection of the Population of the Republic of Kazakhstan dated December 30, 2020.

6) ISO 9000:2015 “Quality Management Systems — Fundamentals and Vocabulary”.

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- ST RK ISO 9001-2016 “Quality Management Systems — Requirements”;
- ST 003-2024 “Management of Organizational Documents”;
- ST 011-2024 “Personnel Management”;
- ST 012-2025 Professional Development of Administrative and Management Personnel, Faculty, and Research Staff;
- ST 023-2024 Standards for Internal Quality Assurance of Educational Activities of «SKMA» JSC;
- C 121-2023 “Code of Academic Integrity”;
- R 507-2026 “Rules for the Use of Artificial Intelligence and Digital Technologies at JSC ‘SKMA’”.

3. TERMS AND DEFINITIONS

The following terms with their respective definitions are used in this document:

Documented information — information that is controlled and maintained by an organization, as well as the medium on which it is stored.

Academic integrity — compliance with the principles of honesty, fairness and responsibility in the process of education, acquisition of knowledge and scientific work, ensuring the prevention and avoidance of corruption.

Principles of academic integrity and anti-corruption:

- **honesty** — not taking or giving bribes and not providing false information;
- **fairness** — providing equal opportunities for everyone and not creating advantages based on personal connections;
- **responsibility** — being accountable for one's actions and complying with legislation and rules;
- **trust** — creating an atmosphere of trust in society and the educational organization;
- **respect** — not violating the rights and work of other persons;
- **transparency** — ensuring transparency of decisions and assessment.

Artificial intelligence — a functional capability that enables the imitation of cognitive functions inherent to humans and provides results comparable to or exceeding the results of human intellectual activity.

User of an artificial intelligence system — a person using an artificial intelligence system to perform a specific function and/or task.

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Result of the activity of an artificial intelligence system — information, a decision or actions, including works and/or services, created by an artificial intelligence system, regardless of their form of presentation.

4. OBJECTIVES, TASKS, FUNCTIONS AND PRINCIPLES OF THE COMPLIANCE OFFICER'S ACTIVITIES

4.1 Objective of the Compliance Officer

The main objective of the Compliance Officer's activities is to ensure compliance by employees and students of the Academy with the legislation of the Republic of Kazakhstan on combating corruption, monitor the implementation of anti-corruption measures, ensure compliance with corporate ethics and the principles of academic integrity, as well as ensure compliance with the internal regulatory documents of the Academy.

4.2 Tasks of the Compliance Officer

1. Ensuring compliance with external and internal regulatory requirements concerning anti-corruption and ethical standards.
2. Ensuring compliance with the fundamental principles of combating corruption in accordance with the legislation of the Republic of Kazakhstan.
3. Identification, assessment and elimination of corruption risks.
4. Identification, assessment and elimination of violations of corporate ethics standards.
5. Analysis of activities, educational and business processes in order to identify corruption risks and ensure compliance with corporate ethics.
6. Providing the management of the Academy with recommendations on minimizing corruption risks and monitoring the implementation of such recommendations.
7. Effective implementation of the system of anti-corruption measures in accordance with the legislation of the Republic of Kazakhstan.

4.3 Functions of the Compliance Officer

1. Developing internal documents on anti-corruption and compliance with corporate ethics standards at the Academy.
2. Developing and updating standards and policies in the field of anti-corruption compliance.
3. Conducting awareness-raising activities on combating corruption and developing an anti-corruption and corporate culture.

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4. Taking measures to identify, monitor and resolve conflicts of interest.
5. Monitoring compliance by employees and students of the Academy with anti-corruption restrictions in accordance with internal regulatory documents and the legislation of the Republic of Kazakhstan.
6. Developing corporate ethical values and a culture of academic integrity at the Academy.
7. Monitoring compliance by employees and students of the Academy with anti-corruption legislation and internal regulatory documents in the field of anti-corruption and corporate ethics.
8. Conducting an internal analysis of corruption risks and taking measures to eliminate them.
9. Ensuring disclosure of information on the results of the internal analysis of corruption risks.
10. Conducting internal investigations.
11. Coordinating activities aimed at reducing corruption risks in the operations of the Academy.
12. Assisting the authorized anti-corruption body in conducting an external analysis of corruption risks in the activities of the Academy.
13. Monitoring and analyzing changes in anti-corruption legislation.
14. Ensuring the inclusion in civil-law agreements concluded by the Academy of provisions requiring the parties to comply with anti-corruption legislation, business ethics and integrity standards, and the principles of fair competition.
15. Assessing the effectiveness of anti-corruption measures implemented by structural divisions and employees of the Academy.
16. Providing recommendations to the Board of Directors or the Rector of the Academy on eliminating identified corruption risks and improving the effectiveness of internal processes and the organization of the Academy's activities.

4.4 Principles of the Compliance Officer's Activities

1. Commitment of the Academy's management to the effectiveness of anti-corruption compliance.
2. Sufficiency of the powers and resources necessary to perform the tasks of the Compliance Officer.
3. Regular assessment of corruption risks.
4. Information transparency of the Compliance Officer's activities.
5. Continuity of anti-corruption compliance activities at the Academy.
6. Improvement of the anti-corruption compliance system.

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7. Independence of the Compliance Officer's activities.

5. RIGHTS AND DUTIES OF THE COMPLIANCE OFFICER

5.1 Rights

1. To request and obtain information and materials from the structural divisions of the Academy, including information and materials constituting commercial and official secrets.

2. To initiate the submission of matters falling within the competence of the Compliance Officer for consideration by the Rector and/or the collegial body of the Academy whose competence includes the relevant matter and/or the Board of Directors.

3. To initiate internal investigations based on reports received concerning possible and/or committed corruption offences, violations of corporate ethics and academic integrity standards.

4. To participate, within his/her competence, in the development and implementation of draft regulatory legal acts.

5. To organize and conduct meetings on matters falling within the competence of the Compliance Officer.

6. To involve employees of other divisions and students of the Academy in planned and unscheduled activities and in the implementation of individual instructions of the Board of Directors and/or the Rector of the Academy.

7. To initiate the submission of matters within his/her competence for consideration by structural divisions.

8. To submit oral and/or written requests to the Board of Directors, the Rector of the Academy, as well as to all structural divisions of the Academy.

9. To represent the interests of and/or act as a representative of the Academy before state bodies and other organizations within his/her competence on the basis of a power of attorney or without one.

10. To initiate the establishment of working groups to implement the main objectives in the areas of combating corruption, compliance with ethical standards, academic integrity and implementation of relevant policies.

11. To review, approve and endorse documents on matters falling within the competence of the Compliance Officer.

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12. To provide recommendations and instructions to divisions of the Academy regarding the development of, and amendments and additions to, the regulatory documents of the Academy concerning the prevention of corruption risks, combating corruption and compliance with ethical standards at the Academy.

13. To issue instructions to the divisions of the Academy regarding the implementation of measures aimed at preventing corruption risks, combating corruption and ensuring compliance with ethical standards throughout the Academy;

14. To involve employees of other divisions and students of the Academy in work aimed at achieving the established goals and objectives.

15. To establish information channels through which citizens may report existing or potential violations of anti-corruption legislation and submit proposals for improving the effectiveness of anti-corruption measures and compliance with ethical standards.

16. To perform all actions that do not contradict the legislation of the Republic of Kazakhstan, the Charter of the Academy, this Regulation and the internal regulatory documents of the Academy.

5.2 Duties

1. To perform the tasks and functions assigned to the Compliance Officer in accordance with this Regulation.

2. In carrying out his/her activities, to comply with the norms and requirements of the legislation of the Republic of Kazakhstan, the Charter, this Regulation and the internal regulatory documents of the Academy.

3. To perform lawful instructions and assignments of the Board of Directors and the Rector of the Academy.

4. To ensure timely review and execution of documents and materials.

5. To maintain confidentiality of information concerning the Academy and its affiliated persons, as well as information that became known during the performance of the Compliance Officer's functions.

6. To ensure confidentiality of persons who have contacted the Compliance Officer regarding alleged or actual corruption, violations of corporate ethics and other internal policies and procedures.

7. To promptly inform the Rector of the Academy and/or the Board of Directors of any situations involving an existing or potential violation of legislation in the field of combating corruption.

8. To report on his/her activities to the Board of Directors and/or the Rector of the Academy.

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9. Not to interfere with the established operating procedures of the Academy.
10. To comply with the requirements of official and professional ethics.
11. To perform other actions that do not contradict the legislation of the Republic of Kazakhstan, the Charter of the Academy, this Regulation and the internal regulatory documents of the Academy;
12. The Compliance Officer shall promote a culture of academic integrity and anti-corruption among students and colleagues and shall strictly adhere to these principles.
13. The Compliance Officer shall comply with the requirements of internal regulatory documents concerning the use of artificial intelligence technologies and digital solutions, including the principles of their safe, ethical and responsible use.

6. PROCEDURE FOR CONDUCTING AN INTERNAL INVESTIGATION BY THE COMPLIANCE OFFICER

6.1 The grounds for conducting an internal investigation by the Compliance Officer shall include:

1. Identification of violations of legislation and internal regulatory documents of the Company concerning anti-corruption compliance, corporate ethics and academic integrity.
2. Information on violations of legislation and internal regulatory documents of the Company concerning anti-corruption compliance, corporate ethics and academic integrity received through information channels (hotline, suggestion box, e-mail, etc.).
3. Complaints, statements and appeals (written or oral) concerning employees and students of the Academy regarding violations of anti-corruption policy, corporate ethics, academic integrity and other requirements.
4. Information published in the mass media concerning a corruption offence or violation of academic integrity standards committed by employees and/or students of the Academy.
5. Findings identified as a result of due diligence of third parties.
6. Instructions and assignments of the Board of Directors and/or the Rector of the Academy.

6.2 An internal investigation shall be conducted by the Compliance Officer pursuant to an order of the Rector of the Academy and/or a decision of the Board of Directors. Where necessary, a working group may be established, which may include

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employees of structural divisions of the Academy and experts from other organizations.

6.3 If there are grounds to believe that violations are being or have been committed with the involvement of the management of the Academy, or if the internal investigation requires additional resources, the Corporate Secretary shall be informed to resolve the issue of involving the internal audit Compliance Officer, members of the Board of Directors or employees of the Sole Shareholder of the Academy in the investigation, subject to agreement.

6.4 During an internal investigation, the Compliance Officer or the working group, if established, shall collect materials, data and information relating to the violation of legislation and internal regulatory documents of the Company concerning anti-corruption compliance and corporate ethics.

6.5 Based on the materials, data and information obtained, the Compliance Officer or the working group, if established, shall analyze the facts of violations of legislation and internal regulatory documents of the Academy concerning anti-corruption compliance and identify the causes and conditions that led to and contributed to the violation.

6.6 The results of the internal investigation shall be documented in the form of a conclusion signed by the Compliance Officer and all members of the working group, if established, and submitted together with the investigation materials to the Rector of the Academy and/or the Board of Directors for consideration.

6.7 Based on consideration of the conclusion and materials of the internal investigation, the Rector of the Academy and/or the Board of Directors shall make one of the following decisions:

1. To submit the materials for consideration by the collegial body, the Council on Ethics and Academic Integrity (hereinafter referred to as the **Council**).
2. To refer the materials to law enforcement authorities.
3. To take the information into consideration.
4. To impose disciplinary liability on an employee and/or student of the Academy.
5. To immediately notify the Sole Shareholder and/or members of the Board of Directors of the Academy of violations of legislation, as well as cases involving officials of the Academy in the commission of a violation.
6. To take another decision aimed at eliminating and/or minimizing the risks identified in the conclusion.

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7. REPORTING

7.1 The Compliance Officer shall be accountable to the Board of Directors and the Rector of the Academy.

7.2 The Compliance Officer shall annually, by July 1, submit an annual report on the work performed in the field of combating corruption to the Board of Directors and/or the Rector of the Academy.

8. RESPONSIBILITY

8.1 The Compliance Officer shall be responsible for the performance of the functions and tasks assigned in accordance with this Regulation.

8.2 The Compliance Officer shall act exclusively in the interests of the Academy and, in accordance with the established procedure, shall ensure:

1. Effective performance of the Compliance Officer's duties in accordance with the tasks and functions established by this Regulation.
2. Performance of the duties specified in the Compliance Officer's job description.
3. Implementation of the tasks assigned to the Compliance Officer in accordance with the procedure established by the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Academy.
4. Monitoring compliance with the internal regulatory documents of the Academy.

8.3 In order to comply with the principles of independence and objectivity in performing his/her functions, the Compliance Officer shall not:

1. Be involved in any activities that may subsequently become the subject of an investigation within the functions of the Compliance Officer.
2. Perform functional duties at the Academy that are unrelated to the activities of the Compliance Officer under this Regulation.
3. Participate in any activity that could compromise impartiality in his/her activities or assessments.

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4. Use confidential information for personal interests or in any other manner contrary to the legislation of the Republic of Kazakhstan or capable of causing damage to the Academy.

5. Accept gifts or use services that could compromise his/her independence, objectivity or impartiality.

8.4 The Compliance Officer shall bear personal responsibility for:

1. Failure to perform or improper performance of official duties assigned to him/her under this Regulation and the internal documents of the Academy.

2. Inefficient use of working time.

3. Failure to comply with labour and performance discipline.

4. Improper monitoring of work aimed at achieving target indicators and performance indicators and ensuring the high-quality and timely implementation, within his/her competence, of the relevant action plan in the field of combating corruption and compliance with corporate ethics standards.

5. Failure to comply with uniform requirements in the field of information and communication technologies and information security.

6. Disclosure of information constituting state, commercial or other secrets protected by the legislation of the Republic of Kazakhstan.

7. Failure to comply with restrictions established by the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Academy on combating corruption.

8. Improper monitoring of the timely and high-quality implementation, within his/her competence, of measures aimed at minimizing key corruption risks.

8.5 The degree of responsibility of the Compliance Officer shall be determined by his/her job description and employment contract.

1. When using artificial intelligence tools, the Compliance Officer shall ensure verification of the reliability of the results obtained, compliance with confidentiality and data protection requirements and the principles of academic integrity, and shall bear personal responsibility for final decisions and materials prepared using such technologies.

2. Failure to comply with the procedure for using artificial intelligence technologies and digital solutions shall be considered an action contrary to the principles of academic integrity.

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9. INTERACTION OF THE COMPLIANCE OFFICER WITH THE BOARD OF DIRECTORS, THE RECTOR AND STRUCTURAL DIVISIONS OF THE ACADEMY

9.1 Within the framework of interaction between the Compliance Officer and the Board of Directors of the Academy, the Board of Directors:

1. Makes a decision on the appointment of the Compliance Officer.
2. Approves the candidacy of the Compliance Officer, as well as the term of his/her powers, in coordination with the Rector of the Academy.
3. Approves the number of positions for the purpose of approving the staffing table of the Compliance Officer.
4. Reviews reports on the activities of the Compliance Officer.
5. Gives instructions to the Compliance Officer in the field of combating corruption within his/her competence.

9.2 Within the framework of interaction with the Rector, the Compliance Officer:

1. Develops a work plan for anti-corruption activities, inspections and consultations.
2. Notifies the Rector of violations of anti-corruption legislation by employees and/or students of the Academy, as well as cases where members of the Academy's management are involved in such violations.
3. Submits to the Rector of the Academy, for decision-making, conclusions and materials based on the results of internal investigations conducted.
4. Submits proposals to the Rector on improving the anti-corruption activities of the Academy, its employees and students.

9.3 Within the framework of interaction between the Compliance Officer and the Rector, the Rector of the Academy:

1. Ensures the creation of an effective working environment at the Academy that facilitates the full and unhindered performance of the Compliance Officer's functions, achievement of the established goals and objectives, and maximum usefulness of the Compliance Officer to the Academy.
2. Assists the Compliance Officer in engaging employees of structural divisions of the Academy as independent experts to obtain the necessary information and consultations on specialized issues.
3. Issues orders on the basis of official letters (submissions) of the Compliance Officer.

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4. In accordance with the procedure established by this Regulation, makes decisions based on consideration of the Compliance Officer's conclusions regarding internal investigations conducted.

5. Monitors the conduct of internal investigations and the status of internal investigations.

6. On the basis of a decision of the Board of Directors, issues an order appointing the Compliance Officer.

7. On the basis of a decision of the Board of Directors, issues orders concerning the commencement, amendment and termination of employment relations with the Compliance Officer.

9.4 Within the framework of interaction with the structural divisions of the Academy, the Compliance Officer:

1. Requests and obtains information and materials from the structural divisions of the Academy, including information and materials constituting commercial and official secrets, within the framework of approved procedures regulated by the organization's internal documents.

2. Requires employees and students of the Academy to provide oral and written explanations within the framework of his/her activities and internal investigations.

3. Does not interfere with the established working procedures of the structural divisions of the Academy.

10. INTERACTION OF THE COMPLIANCE OFFICER WITH THE TERRITORIAL DIVISION OF THE AUTHORIZED ANTI-CORRUPTION BODY

Within the framework of interaction with the territorial division of the authorized anti-corruption body, the Compliance Officer receives methodological and informational support.

11. QUALIFICATION REQUIREMENTS FOR THE COMPLIANCE OFFICER

11.1 The staffing level of the Compliance Officer shall be determined by the organizational structure and staffing level of the Academy, approved by a decision of the Board of Directors and an order of the Rector of the Academy.

11.2 The position of Compliance Officer consists of one staff unit.

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11.3 Qualification requirements for the Compliance Officer:

1. Higher or postgraduate education in the field of law, with a degree in “Jurisprudence” or “Law”.
2. At least three years of work experience in the fields of combating corruption or compliance, or higher/postgraduate education, special training in anti-corruption compliance and at least three years of work experience in the relevant professional field.

12. FINAL PROVISIONS

Amendments and additions to this Regulation shall be made by the Compliance Officer as necessary and shall be approved by the Rector of the Academy.

ONTÜSTIK-QAZAQSTAN MEDISINA AKADEMIASY «Оңтүстік Қазақстан медицина академиясы» АҚ		 SOUTH KAZAKHSTAN MEDICAL ACADEMY АО «Южно-Казахстанская медицинская академия»
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Developed by:

Position	Full Name	Date	Signature
Compliance Officer	Pernebayev N.A.	31.08.2026	

Reviewed by:

Position	Full Name	Date	Signature
Head of the Quality Assurance and Monitoring Department	Erzhanov N.A.	31.08.2026	
Head of the Department of Administrative and Legal Support	Kabishtayev O.A.	31.08.2026	

Agreed by:

Position	Full Name	Date	Signature
Vice-Rector for Educational and Social Affairs	Salim E.K.	31.08.2026	
Vice-Rector for Research and Strategic Development	Aukenov N.E.	31.08.2026	
Vice-Rector for Academic Affairs	Anartayeva M.U.	31.08.2026	
Vice-Rector for Clinical Affairs	Nurmashev B.K.	31.08.2026	