

Analytical report on the results of an internal analysis of corruption risks in the activities of the Republican State Enterprise on the right of economic management "Research institute for biological safety problemsinforms " Ministry of Health of the Republic of Kazakhstan

Introductory part

An internal analysis of corruption risks in the activities of the RSE at the Research Institute of Biological Safety Problems of the Ministry of Health of the Republic of Kazakhstan was conducted in accordance with paragraph 5 of Article 8 of the Law of the Republic of Kazakhstan dated November 18, 2015 No. 410-V of the Anti-Corruption SAM "On Combating Corruption", "On Amendments to the order of the Chairman of the Agency of the Republic of Kazakhstan for State Anti-Corruption Service No. 12 dated October 19, 2016 "On Approval of Standard Rules for Conducting Internal Analysis of Corruption Risks"", approved by the Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) No. 21 dated January 16, 2023 (hereinafter referred to as the Model Rules) and Methodological Recommendations for Conducting an Internal Analysis of Corruption Risks.

The name of the object of internal analysis of corruption risks: Republican State Enterprise on the right of economic management "Research institute for biological safety problemsinforms " Ministry of Health of the Republic of Kazakhstan (hereinafter - the Enterprise or Company).

In order to conduct the analysis, by Order No. 186-P of June 26, 2023, the Acting General Director of the Enterprise was appointed responsible for conducting an internal analysis of corruption risks in the Company's activities, compliance officer - Kalizharova Dinara Ersenovna.

The analyzed period of the Company's activity: January 01, 2023 - June 26, 2023.

In accordance with paragraph 11 of the Model Rules, an internal analysis of corruption risks in the Company's activities (hereinafter referred to as the Company or Enterprise) was carried out in the following areas:

1) identification of corruption risks in regulatory legal acts affecting the activities of the Enterprise; internal documents of the Enterprise;

2) identification of corruption risks in the organizational and managerial activities of the Enterprise.

Descriptive part

In the first direction:

Identification of corruption risks in regulatory legal acts affecting the Company's activities; internal documents of the Company

I have studied the legal acts affecting the Company's activities:

The Code of the Republic of Kazakhstan "On the health of the people and the healthcare system";

- Labor Code of the Republic of Kazakhstan;
- Budget Code of the Republic of Kazakhstan;
- The Law of the Republic of Kazakhstan "On State Property";
- The Law of the Republic of Kazakhstan "On Public Procurement";
- The Law of the Republic of Kazakhstan dated February 18, 2011 "On Science".

Internal documents of the Enterprise were also studied:

- The Charter of the Company;
- Collective agreement;
- Regulations on the Attestation Commission;
- Anti-corruption policy;
- Regulation on Anti-corruption-Compliance service;
- Regulations on departments and laboratories;
- job descriptions of employees, etc.

To date, in the current legislation affecting the activities of the Enterprise, there are no possible risks to corrupt actions.

The development and adoption of internal documents of the Company is carried out in accordance with the current legislation of the Republic of Kazakhstan. Amendments and additions to the existing internal documents are carried out as the legislation changes and according to the terms of the audit.

According to the results of the internal analysis, legal gaps and conflicts in the internal documents regulating the Company's activities have not been identified.

In the second direction:

Identification of corruption risks in the organizational and managerial activities of the Enterprise

In the organizational and managerial activities of the Enterprise for the period under study, the following areas of activity were analyzed.

1. Personnel management.
2. Conflict of interest settlement.
3. Organization of anti-corruption work.
4. Development and distribution of budgetary and financial resources.
5. Conclusion of contracts with individuals and legal entities.
6. Ensuring transparency and publicity of activities.

1. Personnel management

The organizational structure of the Company was approved by the General Director on January 4, 2023.

The Company has approved the Regulations on the procedure for certification of employees. Certification of employees of the Enterprise takes place in accordance with the requirements of this Regulation and the Labor Code of the Republic of Kazakhstan. The purpose of the certification is to confirm the compliance of employees with their positions on the basis of an assessment of the

results of their professional activities and compliance with the principle of meritocracy.

The full-time number of employees of the Enterprise for the analyzed period is 287 units, 26 units on parental leave. During the study period, no negative materials were revealed in relation to employees in the mass media.

The number of 20 (twenty) people hired during the analyzed period, 18 (eighteen) dismissed, employees dismissed in accordance with paragraphs 1) and 5) of Article 49, paragraph 2 of Article 56, paragraph 2 of Article 96 of the Labor Code of the Republic of Kazakhstan, there is no demotion.

The transfer of employees to another position is carried out in accordance with the legislation of the Republic of Kazakhstan.

According to the results of the analysis of personnel management activities, corruption risks have not been identified. All procedures for certification of employees are carried out in accordance with the legislation of the Republic of Kazakhstan, there is no information about the presence of administrative and criminal liability for corruption and other actions of employees of the Enterprise.

2. Conflict of interest settlement

Conflict of interest settlement in the Enterprise is carried out on the basis of the Policy on identification and settlement of Conflicts of interest of officials and employees of the RSE at the PCV "NIIPBB" of the Ministry of Health of the Republic of Kazakhstan, approved by the General Director of the Enterprise.

There were no facts of conflicts of interest among the Company's employees in the performance of their official duties.

According to the results of the internal analysis on the settlement of the conflict of interests, no risks were identified.

3. Organization of anti-corruption work

The Company has a compliance service, represented by a compliance officer accountable to the General Director of the Company

The General Director of the Company approved the following documentation on anti-corruption compliance:

- Regulations on the Anti-Corruption Compliance Service
- Anti-corruption policy
- Anti-corruption instructions
- Policy on identifying and resolving conflicts of interest
- Corporate Code of Ethics and Conduct

Explanatory and training events on anti-corruption issues are held for the Company's employees.

The analysis of appeals from individuals and legal entities during the study period shows that there were no appeals from individuals and legal entities related to corruption.

There is a section on Anti-Corruption compliance on the official website of the Company.

According to the results of the analysis of the organization of anti-corruption work, no risks have been identified.

4. Development and distribution of budgetary and financial resources

An independent audit of the Company's financial statements for 2022 was also conducted by the independent audit company Russel Bedford A+ Partners LLP. According to the conclusion, the financial statements in all material aspects reliably reflect the financial position of the Company as of December 31, 2022, as well as its financial results and cash flows for the year ended on that date, in accordance with IFRS.

According to the results of the analysis of the activities for the development and distribution of budgetary and financial resources, no risks have been identified.

5. Conclusion of contracts with individuals and legal entities

When concluding contracts with suppliers of goods, works, services, the company is guided by the Civil Code of the Republic of Kazakhstan, the Budget

Code of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On Public Procurement", "On Science" and other regulatory legal acts.

The contracts concluded by the Enterprise with individuals and legal entities provide for the payment of a penalty in case of improper performance of contractual obligations.

The facts of reducing the amount of the penalty have not been revealed. Adjustments to the terms of the concluded contracts at the stage of their execution have not been identified.

Statements of claim for non-fulfillment or improper fulfillment by the counterparty of its obligations under concluded contracts for public procurement of goods, works, services are made in accordance with the Civil Code and legislation on public procurement in compliance with the rules of public procurement.

According to the results of the analysis of the activity of concluding contracts with individuals and legal entities, no risks have been identified.

6. Ensuring transparency and publicity of activities

When conducting an internal analysis of corruption risks in the direction of Ensuring transparency and publicity of the Company's activities, corruption risks were not identified.

The company does not provide public services.

The company does not implement licensing functions.

The company does not implement control functions.

There were no acts of prosecutor's supervision related to corruption.