

**Analytical report on the results of an internal analysis of corruption risks in the activities of the Research institute for biological safety problems" Ministry of Health of the Republic of Kazakhstan**

Gvardeysky

03 may, 2024

**The name of the object of internal analysis of corruption risks:** Research institute for biological safety problems" Ministry of Health of the Republic of Kazakhstan (hereinafter - the Enterprise).

An internal analysis of corruption risks in the activities of the RSE at the Scientific 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, Order No. 88/2-P of the General Director of the Enterprise dated March 05, 2024 and Methodological recommendations for conducting an internal analysis of corruption risks.

Also, a compliance officer, Kalizharova Dinara Yersenovna, has been appointed responsible for conducting an internal analysis of corruption risks in the Company's activities.

The analyzed period of the Company's activity: the second half of 2023.

In accordance with paragraph 11 of the Order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 No. 12 "On approval of Standard Rules for conducting Internal Analysis of corruption Risks", the analysis of the Company's activities 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.

**In the first direction:**

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

I have studied the legal acts affecting the C Enterprise activities:

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

- The 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".

The Company's internal documents were also examined:

- The Charter of the Company;
- Collective agreement;
- Regulations on the Attestation Commission;
- Anti-corruption policy;
- Regulations on the Anti-Corruption and 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 Enterprise 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 legislation changes and according to the terms of verification.

**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 during the period under study, the following areas of activity are analyzed.

1. Personnel management.
2. Organization of anti-corruption work.
3. Development and distribution of budgetary and financial resources.
4. Conclusion of contracts with individuals and legal entities.

#### **1. Personnel management**

The Company has approved a Regulation on the procedure for certification of employees. The certification of the Company's employees 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 based on an assessment of the results of their professional activities and compliance with the principle of meritocracy.

During the study period, no negative materials were revealed in relation to employees in the media.

The number of employees hired during the analyzed period was 17 (seventeen), 11 (eleven) were dismissed, employees were 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, one employee was dismissed in accordance with paragraph 3) of Article 49, with subparagraph 8) of paragraph 1 of article 52, paragraph 2 of article 96

There was no demotion in the Labor Code of the Republic of Kazakhstan.

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 the**

**certification of employees are carried out in accordance with the legislation of the Republic of Kazakhstan, there is no information on the existence of administrative and criminal liability for corruption and other actions of employees of the Enterprise.**

## **2. 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 has approved the following documentation on anti-corruption compliance, as well as additions to the documentation are planned in 2024:

- Regulation on the Anti-Corruption Compliance Service
- Anti-corruption policy
- Anti-corruption instructions
- Policy on the identification and settlement of 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 activities on the organization of anti-corruption work, no risks have been identified.**

## **3. Development and distribution of budgetary and financial resources**

At the time of the analysis, the Company conducted an independent audit of the financial statements for 2023, to date, the conclusion has not yet been issued. There were no comments or comments on the reports on the use of allocated funds.

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

#### **4. Conclusion of contracts with individuals and legal entities**

When concluding contracts with suppliers of goods, works, and 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.

There were no facts of a reduction in the amount of the penalty. No adjustments to the terms of the concluded contracts have been identified at the stage of their execution.

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 legislation of the Republic of Kazakhstan.

**According to the results of the analysis of the activity of concluding contracts with individuals and legal entities, no risks have been identified. It was recommended to supplement the agreements with anti-corruption clauses.**

There have been no acts of prosecutorial supervision r