**Financial Settlement Center**

**of Renewable Energy**

Appendix 5 to the decision

of the Supervisory Board of

FSC of RE LLP

dated November 02, 2022

(Protocol No. 4)

APPROVED

by the decision of the

Supervisory Board of

FSC of RE LLP

dated November 02, 2022

(Protocol No. 4)

**ANTI-CORRUPTION STANDARDS**

**OF “FSC of RE” LLP**

**Astana, 2022**

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 2 of 10** |

**I. General provisions**

1. The anti–corruption standards of FSC of RE LLP (hereinafter referred to as the Standards and the Partnership, respectively) have been developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, the National Standard of the Republic of Kazakhstan "Anti-Corruption Management System", approved by Order No. 318-od of the Chairman of the Committee for Technical Regulation and Metrology dated November 16, 2017, taking into account the requirements of the International Standard ISO 37001 "Anti-corruption Management System", the Charter and other internal regulatory documents of the Partnership.

The standards are a system of rules of conduct, permits, prohibitions and restrictions aimed at achieving an atmosphere of intolerance to any manifestations of corruption in the activities of the Partnership.

2. The purpose of the Standards is to prevent corruption by creating a system of value and moral anti-corruption guidelines for the employees of the Partnership.

3. Objectives of the Standards: prevention of corruption manifestations through the formation of sustainable anti-corruption behavior of employees of the Partnership, the development of corporate values, work style and norms of behavior of employees of the Partnership, increasing transparency and transparency in the activities of the Partnership.

4. Scope of application of the Standards: the activities of the Partnership.

**II. Standards of conduct (actions) that are mandatory for the employees of the Partnership in the performance of their official duties**

5. In their activities, the employees of the Partnership, when performing their official duties, are obliged to:

1) be guided by the principle of legality in accordance with the legislation of the Republic of Kazakhstan;

2) perform the assigned professional functions in good faith, properly and only in the interests of the state, the Sole participant of the Partnership and the Partnership, applying all their knowledge and experience for this;

3) exercise powers within the limits of the rights granted to them and in accordance with official duties, internal regulatory documents and the legislation of the Republic of Kazakhstan;

4) to provide only objective and reliable information in the process of executing the orders of the heads of the Partnership;

5) to be personally active in combating corruption, uncovering corruption offenses;

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 3 of 10** |

6) not to persuade or encourage other employees, officials of the Partnership to commit corruption offenses;

7) not to be guided by personal and selfish interests in the performance of their official duties;

8) take measures to prevent any possibility of a conflict of interest in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the Partnership;

9) not to accept money, securities, other material values, not to use property-related services for the use of their official position, as well as for general patronage or connivance at work in the interests of the person engaged in bribery;

10) not to give preference to individuals and legal entities, to be independent of their influence in the performance of their official duties;

11) observe business etiquette and subordination both in the team of the Partnership and when interacting with third parties;

12) refrain from discussing the personal and professional qualities of colleagues who discredit their honor and dignity in the team of the Partnership;

13) observe confidentiality and ensure the preservation of official and commercial secrets;

14) inform the immediate supervisor about the facts of corruption that have become known to him, as well as about the inclination to receive any benefit for expedited consideration of materials or red tape, about doubts about the legality of the order received for execution;

15) refuse to be appointed to a position if it is connected with the direct subordination or control of persons who are in close family relations (parents, spouses, brothers, sisters, children);

16) be impartial and independent from the activities of political parties, public and religious associations;

17) comply with the requirements of the legislation of the Republic of Kazakhstan, Standards and internal regulatory documents of the Partnership;

18) to prevent the commission of misdemeanors and other offenses for which the law provides for disciplinary, administrative or criminal liability.

6. Employees of the Partnership, regardless of their position, are personally responsible for compliance with the internal regulatory documents of the Partnership on combating corruption, Standards.

**III.Standards in the field of managerial decision-making, mandatory for managers**

7. The heads of all levels of the organizational structure of the Partnership, when making managerial decisions, are obliged to:

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 4 of 10** |

1) to form an ethical standard of irreconcilable attitude to any forms and manifestations of corruption at all levels, setting an example to subordinate employees by their behavior;

2) to manage subordinate employees through sole administrative activities and bear personal responsibility for the legality of decisions taken;

3) evenly distribute the workload among employees who are subordinate, clearly define the tasks and scope of their official powers;

4) to show fairness and objectivity in assessing the performance of subordinate employees, as well as in applying incentives and penalties to them;

5) identify possible corruption risks when performing their official duties, making managerial decisions;

6) not to force subordinate employees to commit corruption offenses;

7) to prevent and suppress the facts of violations of anti-corruption legislation by subordinates and other employees of the Partnership; 8) timely take comprehensive measures to resolve the conflict of interests that arose in the subordinate employee during the performance of his official duties;

9) know the business and moral qualities of their subordinate employees, be able to identify and prevent their actions (inaction) in a timely manner, which may lead to the commission of corruption manifestations;

10) not to give their subordinate employees clearly impossible instructions (instructions) or beyond the scope of their official duties, as well as contrary to legislation, including anti-corruption legislation;

11) not to use their official position to influence the activities of subordinate employees in solving issues of an off-duty nature.

**IV. Standards for the development, approval and adoption of draft internal documents**

8. When developing, approving and adopting internal documents (internal regulatory documents - policies, rules, regulations, instructions, as well as internal documents - orders and other documents) in the Partnership, it is necessary:

1) strictly comply with the requirements of the legislation of the Republic of Kazakhstan, internal regulatory documents, including the rules of the Partnership – the Rules of interaction of structural divisions of the FSC of RE LLP on business processes;

2) not to go beyond the powers and competencies of the bodies and officials of the Partnership, regulated by the legislation of the Republic of Kazakhstan, the Charter and internal regulatory documents;

3) to prevent the development and adoption of legal acts, local acts of Partnership in order to benefit themselves and third parties;

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 5 of 10** |

4) manage the documented information as necessary to ensure the effectiveness of the anti-corruption management system for the purpose of its storage and protection, compliance with the terms of storage and the order of destruction.

9. When conducting a legal examination of the accepted internal documents of the Partnership, pay special attention to the presence of corruption-causing factors and discretionary powers of officials in them, which may create prerequisites for employees to commit illegal actions of a corrupt and other illegal nature.

**V. Standards in the organization of procurement related to the purchase of goods, works, services**

10. In the process of organizing and conducting purchases of goods, works, services, the Partnership is obliged to:

1) ensure openness and transparency of the procurement process;

2) to prevent the occurrence of corruption manifestations in the implementation of procedures for the organization and conduct of procurement;

3) to prevent a conflict of interests in the procurement process (if any of the members of the tender (auction) commission has a conflict of interests, this person notifies the chairman of the commission and does not participate in the commission's decision-making).

**VI. Standards in the field of organization of personnel work on the selection and placement of employees**

11. When organizing personnel work and in the process of recruitment and placement of personnel, the Partnership is obliged to:

1) comply with the requirements of the labor and anti-corruption legislation of the Republic of Kazakhstan in the selection of personnel;

2) strictly observe the principles of meritocracy;

3) to prevent cases of recruitment and placement of personnel on the grounds of kinship, fraternity and personal devotion; 4) when applying for a job, explain the main duties, prohibitions and restrictions imposed on employees of the Partnership;

5) familiarize employees who have been hired with the internal regulatory documents of the Anti-Corruption Partnership, Standards and other internal regulatory documents that are mandatory for the performance of their official duties; 6) to prevent the transfer of information about the personal data of employees of the Partnership to third parties, except in cases provided for by the legislation of the Republic of Kazakhstan;

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 6 of 10** |

7) to prevent the commission of actions that may lead to the use of official powers and authority based on them in personal, group and other non-official interests.

**VII. The standard in the field of interaction with the public, civil society institutions, and the mass media**

12. In order to be open, transparent and create a positive image of the Partnership, to develop constructive interaction with the public, civil society institutions and the media (hereinafter referred to as the media), the Partnership needs to use a corporate website, social networks, Internet resources.

13. When interacting with the public, civil society institutions, mass media, it is necessary to comply with the requirements of the legislation of the Republic of Kazakhstan on non-disclosure of official and commercial secrets, confidential information.

14. Every employee of the Partnership should understand and always remember that any point of view expressed by him or disseminated information directly relates to the Partnership itself, its image and affects its reputation in the business community.

**VIII. Standards in the field of relations with third-party organizations and individuals**

15. In a Partnership, it is necessary to establish a ban for employees to give and accept gifts and provide non-service services in order to obtain property benefits, benefits or advantages using their official powers. When exercising their official powers, managers at all levels should be prohibited from accepting gifts from subordinates or other persons to whom their official powers apply, despite the reasons for their donation (holidays, birthdays, promotion, employment and other cases).

16. Refusal of invitations to intra-republican, foreign tourist, health and wellness and other trips at the expense of individuals and legal entities, with the exception of:

carried out in accordance with international treaties of the Republic of Kazakhstan or by mutual agreement between state bodies of the Republic of Kazakhstan and state bodies of foreign states at the expense of the relevant state bodies and (or) international organizations;

carried out with the consent or at the invitation of a state body for participation - in scientific, sports, creative, professional, humanitarian events at the expense of organizations, including trips carried out within the framework of the statutory activities of such organizations. 17. According to the Rules of Accounting and storage of state-owned property,

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 7 of 10** |

approved by the Decree of the Government of the Republic of Kazakhstan No. 833 dated July 26, 2002, within 7 calendar days from the date of receipt to the special fund, the Partnership must regulate the voluntary delivery of gifts:

received without the knowledge of an official of the Partnership;

handed over (handed over) in public or during official events.

Violation of the seven–day period (for money received into the account without his knowledge - a two-week period), as well as acceptance of gifts in connection with the performance of official functions may become grounds for criminal or administrative liability.

**IX. Consequences associated with non-compliance with Standards**

18. An employee of the Partnership who violates the requirements of the Standards is brought to disciplinary responsibility in accordance with the established procedure, up to dismissal from his position.

19. All cases of violation of Standards by employees of the Partnership should be brought to the management – the General Director, the Supervisory Board of the Partnership according to their subordination.

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 8 of 10** |

Appendix

to the Anti-Corruption Standards

of FSC of RE LLP

**Obligation to comply with the Anti-Corruption Standards of FSC of RE LLP**

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*(position)*

I am familiar with the Anti-Corruption Standards of FSC of RE LLP (hereinafter referred to as the Standards) and accept the principles and values of FSC of RE LLP in the field of respect for the rights and legitimate interests of individuals and legal entities and their protection from corruption.

I hereby express my agreement with the Standards, undertake to fulfill all the requirements and be guided by them in my professional activities.

I have been warned and am aware of my personal responsibility for violating the Standards.

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*(signature / surname, first name, patronymic)*

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| **Financial Settlement Center**  **of Renewable Energy** | **Anti-corruption standards**  **of “FSC of RE” LLP** | |
| **revision 1** | **page 9 of 10** |

**Approval Sheet**

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| **Post** | **Full name** | **Date** | **Signature** |
| General Director | Nalibayeva G.K. |  |  |
| Director of the Department of Legal Support and Administrative Support | Baktygalieva E.V. |  |  |
| Compliance Officer  Anti-Corruption  Compliance Service | Mukusheva M.Sh. |  |  |

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| **Financial Settlement Center**  **of Renewable Energy** | **Instruction оn combating corruption and commercial bribery**  **in the “FSC of RE” LLP** | |
| **revision 1** | **page 10 of 10** |

**The List of Familiarization**

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