Annex 2

**Extract from the speech of the Compliance Officer at the Staff meeting**

**of NpJSC «Astana Medical University»**

**(protocol 2 from 13 of March, 2024)**

According to the letter of the Ministry of Healthcare of the Republic of Kazakhstan (hereinafter referred to as MH RK) for 06-1-06/1998-I from 21.02.2024 approved the schedule of internal analysis of corruption risks (hereinafter referred to as IACR) in the Central Administration, in departmental organizations of the Ministry of Healthcare of the Republic of Kazakhstan approved on 20 of February 2024 for 181. In accordance with the schedule of IACR, the beginning of the analysis for all entities of the quasi-public sector of the Ministry of Healthcare of the Republic of Kazakhstan determined on March of this year. On the basis of the received schedule of IACR, 12 of March, Board Chairman – Rector has received a service note on the beginning of IACR and its preparation. **IACR** will be conducted in the framework of the Model Rules for internal corruption risk analysis (approved by the order of Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption from 19 of October, 2016 №12, with amendments from 16.01.2023 for №21) and Methodical Recommendations on internal analysis of corruption risks (approved be the order of Chairman of the Agency of the Republic of Kazakhstan for combating corruption (Anti-Corruption Service) from 30 of December 2022 №488) **For implementing the objectives, it is important to require the following procedures:**

1. To make an announcement on the Internet resource of the University, Mass

Media (hereinafter referred to as Mass Media) and social networks on beginning of IACR – 13 of March of this year.

1. The preparations for an internal analysis of corruption risks that include:
2. Determining the name of the unit subject to internal analysis of corruption

risks, in this case University;

1. Areas of internal analysis of corruption risks in accordance with paragraph

11 of the Model Rules:

- identification of corruption risks in Normative Legal Acts that impact on the

activity of the subject of analysis

In Normative Legal Acts that impact on the activities of entities, identifying

discretion and rules that facilitate the commission of corruption offences;

* identification of corruption risks in organizational and managerial activities

of the object of analysis.

Organizational and managerial activities of the object of analysis include the following issues:

1. personnel management, including the identification of positions that subject to corruption risks;
2. the settlement of conflict of interests;
3. provision of public services;
4. implementation of permitting functions;
5. implementation of control and audit functions;
6. development and distribution of budgetary and financial resources;
7. conclusion of contracts with natural and legal persons;
8. development and operation of information systems;
9. other issues occurring from the organizational and managerial activity of the object of analysis.
10. Identification of a structural unit, official(s) or a member of a Working

Group that will conduct an internal analysis of corruption risks:

* to approve the order for holding of IACR – 20 of March of this year;
1. identification of the period, covered by internal analysis of corruption

risks:

* the period covered by IACR from July 2023 to March 2024 inclusive,

considering that the previous analysis of corruption risks at the University was hold from June 2022 to June 2023;

1. Identifying of the period of internal analysis of corruption risks;
* the term of IACR from 1 to 30 of April of this year;
1. Identification of an Official of the subject of internal analysis of corruption

risks, who is responsible for coordination and conducting internal analysis of corruption risks (Head of the Working Group – Compliance Officer of the University).

1. to make an announcement on the Internet resource of the University, Mass

Media and social networks on the beginning of the public discussion of the results of IACR for up to 17 of April of this year;

1. to hold a public discussion on the results of IACR for up to 24 of April of

this year;

1. to sign the analytical report on the results of IACR - from 30 of April to

17 of May of this year;

 A list of Officials that subject to corruption risks attached to analytical reference;

1. To develop a Plan of Measures to eliminate the causes and conditions

conducive to the commission of corruption offences, revealed by the results of IACR (hereinafter referred to as the Plan of Measures) – for up to 31 of May of this year.

1. To post an Analytical Report and the Plan of Measures on the Internet

resource of the University – for up to 5 of June of this year.

In this regard, it is necessary to provide the following information to the Working Group promptly:

1. legal acts, internal documents regulating the activities of the University;
2. departmental statistical reporting on the activities of the University;
3. data of information systems of State and Law Enforcement Agencies on the

activities of the University;

1. the results of audits previously conducted by State Agencies in relation to the

University;

1. the results of control actions of internal audit services (references and reports

for the audited period);

1. the results of anti-corruption monitoring (previously conducted);
2. publications in the Mass Media;
3. the appeals from individuals and legal entities in relation to University

employees;

1. an information on the identification and prosecution of employees of the

object of analysis for committing corruption offenses;

1. the results of the earlier conducted internal analysis of corruption risks

(IACR conducted in 2023, the situation on elimination of corruption risks according to the Plan);

1. the results of the survey (interview) of staff, employees of the University;
2. other information that is not prohibited by the legislation of the

Republic of Kazakhstan.

The University employees were notified about the submission of the above-

mentioned sources of information to the person authorized to conduct an internal analysis of corruption risks, the working group, information about existing corruption risks, including the development of proposals to minimize and eliminate them, proposals to improve legislation and law enforcement practice on anti-corruption issues. The practice of applying the rules of the legislation of the Republic of Kazakhstan affecting the activities of the University is also explained.