

List of Risks Identified Following the Internal Analysis of Corruption Risks in the Joint Stock Company “National Center for Professional Development “Orleu”

No.	Recommendation based on internal corruption risk analysis	Activity/Action	Form of completion	Responsible executors	Deadline	Implementation status
1.	Absence of an internal regulatory document governing academic integrity issues within the Company. Considering that the Company’s core activities are related to the educational process, the absence of an approved Academic Integrity Policy entails significant risks of non-compliance with academic integrity principles by the Company’s employees.	Development and approval of the Academic Integrity Policy	Academic Integrity Policy	Deputy Chair of the Management Board for Academic Affairs	Q1 2026	In progress. The deadline has not yet arrived
2.	The Analysis revealed the absence of an internal regulatory document governing the Gifts and Hospitality Policy. The absence of such a policy may create significant legal, reputational, and financial risks for the organization. Without a clear policy, employees may accept or give gifts at their discretion, potentially leading to unjustified decisions in favor of certain partners, conflicts of interest, or distortion of competition.	Development and approval of the Gifts and Hospitality Policy	Gifts and Hospitality Policy	Anti-Corruption Compliance Officer	Q1 2026	In progress. The deadline has not yet arrived

3.	The procedure and order for making payments are not formally regulated in the Company, which may create risks of selective payments to counterparties (for example, under public procurement contracts one supplier is paid within 1–2 days, while another is paid on the 30th day).	Development and approval of Payment Procedure Regulations	Payment Procedure Regulations	Deputy Chair of the Management Board for Financial , Administrative, and Legal Affairs	Q4 2025	Ongoing. Explanatory and preventive work is carried out on a continuous basis by the Compliance Officer; in case of appeals through feedback channels, legal consultations are provided to course participants and other persons.
4.	The analysis revealed that not all internal regulatory documents of the Company undergo anti-corruption review by the Compliance Officer for the presence of corruption-prone provisions, despite the relevant requirement set out in the Instruction on the Organization of the Anti-Corruption System. Given that the Instruction is currently planned to be repealed, it is necessary to approve an order requiring the mandatory	Development and approval of an Order on Mandatory Anti-Corruption Review of Internal Regulatory Documents	Order on Mandatory Anti-Corruption Review of Internal Regulatory Documents	Anti-Corruption Compliance Officer	Q4 2025	In progress. The deadline has not yet arrived

	involvement of the Anti-Corruption Compliance Officer in the approval process of internal regulatory documents to minimize corruption risks.					
5.	There is a need to update the Company's Anti-Corruption Standard. Currently, it is an appendix to the Company's Anti-Corruption Policy. However, under the implementation of Standard Basic Direction No. 4 "Prevention and Counteraction to Corruption" for 2025, it is necessary to approve a separate Anti-Corruption Standard in accordance with the Methodological Recommendations for the Development of Anti-Corruption Standards approved by Order No. 285 of the Chairperson of the Anti-Corruption Agency of the Republic of Kazakhstan dated December 31, 2024 (deadline — December 2025).	Development and approval of the Anti-Corruption Standard	Anti-Corruption Standard	Anti-Corruption Compliance Officer	Q4 2025	In progress. The deadline has not yet arrived
6.	The Company systematically carries out work to ensure information security in its activity. However, not all personal computers have a sufficient level of protection against external	Development and approval of the Personal Data Security and Protection Policy	Personal Data Security and Protection Policy	Deputy Chair of the Management Board for Digitalization; Information Security Officer	Q1 2026	In progress. The deadline has not yet arrived

	access (regular updates of antivirus databases, antivirus maintenance of workstations/servers/laptops, updating and monitoring of logins for the Company's information systems). In addition, the Company has not developed or approved a Personal Data Security and Protection Policy, which may create a risk of potential leakage of personal data related to the Company's activities, including official, commercial, and other confidential information.					
7.	Third-party organizations are not authorized to represent JSC "NCPD "Orleu", form participant lists, or collect payments for courses. Such cases are of serious concern as they cause reputational damage to "NCPD "Orleu".	In order to prevent such reputational risks, it is recommended to strengthen awareness-raising and preventive work among course participants regarding fraud cases.	Information on conducted awareness-raising and preventive activities	Anti-Corruption Compliance Officer	Ongoing	In progress. The deadline has not yet arrived
8.	To prevent corruption risks, it is necessary to continuously promote the prevention of corruption	Approval of the Compliance Risk Map for the	Compliance Risk Map; Register of	Anti-Corruption Compliance Officer	Q4 2025	In progress. The deadline

	offenses and approve a Compliance Risk Map.	current year; development of a register of positions exposed to corruption risks; ongoing monitoring based on performance results.	Positions Exposed to Corruption Risks			has not yet arrived
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