



APPROVED  
by the Decision of the Executive Director  
of the International Research Hub

COMPLIANCE STATEMENT  
International Research Hub Public Foundation  
Astana, 2025

1. General Information

The International Research Hub Public Foundation (hereinafter referred to as the Foundation) conducts its activities in accordance with the legislation of the Republic of Kazakhstan, the Foundation's Charter, and a comprehensive system of internal policies and governance documents designed to ensure legality, transparency, accountability, and effective organizational management. The Foundation is committed to the principles of good governance and applies governance practices consistent with internationally recognized standards for nonprofit organizations.

2. Internal Governance Framework

To ensure an effective system of governance, internal control, and institutional compliance, the Foundation has adopted and implemented a comprehensive framework of internal policies and procedures, including:

1. Financial Policy;
2. Procurement Policy;
3. Human Resources Policy;
4. Conflict of Interest Policy;
5. Code of Ethics;
6. Personal Data Processing and Protection Policy;
7. Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy.

These internal policies regulate the Foundation's key operational areas and are applied in an integrated and mutually complementary manner.

3. Principles of Compliance

The Foundation conducts its activities in accordance with the following fundamental principles:

1. compliance with applicable laws and regulations;
2. transparency of financial and operational activities;
3. accountability to donors, partners, beneficiaries, and other stakeholders;
4. proper and purpose-oriented use of financial resources;
5. prevention and management of conflicts of interest;
6. adherence to high standards of professional ethics, integrity, and good faith.

The Foundation applies a risk-based approach when identifying, assessing, and managing financial, operational, legal, compliance, and reputational risks.

4. Financial Transparency and Internal Control

The Foundation maintains documented evidence of all financial transactions, ensures separate accounting for individual projects and funding sources, and provides full traceability of the receipt and use of funds.

Financial management is carried out in accordance with the legislation of the Republic of Kazakhstan and the Foundation's internal financial procedures.

5. Due Diligence of Donors, Partners, and Counterparties

The Foundation applies due diligence procedures with respect to donors, partners, contractors, and other counterparties to the extent proportionate to the nature of the relationship and the associated level of risk.

Such verification is based on publicly available information and other reliable sources and is intended to confirm legal status, integrity, business reputation, and, where applicable, the legitimacy of funding sources.

#### 6. Personal Data Protection

The Foundation processes personal data in accordance with the legislation of the Republic of Kazakhstan and implements appropriate organizational and technical safeguards to protect personal data against unauthorized access, disclosure, alteration, loss, or destruction.

Where appropriate, the Foundation's internal practices take into account internationally recognized data protection principles, including those reflected in the General Data Protection Regulation (GDPR).

#### 7. Prevention of Financial Crime

The Foundation maintains internal procedures intended to prevent the misuse of its activities, resources, or projects for the purposes of money laundering or terrorist financing.

These procedures include risk assessment, due diligence of counterparties, documentation of financial transactions, and internal financial oversight.

The Foundation is not a reporting entity for financial monitoring purposes under the legislation of the Republic of Kazakhstan; however, it voluntarily implements reasonable internal compliance measures consistent with the nature of its activities.

#### 8. Governance and Allocation of Responsibilities

Overall management of the Foundation's compliance system is exercised by the Executive Director, who makes management decisions based on information and recommendations prepared by responsible personnel within the framework of the Foundation's internal governance system.

Preparation of documentation, implementation of internal procedures, and compliance reviews are performed by responsible employees, experts, consultants, or project personnel within the scope of their assigned responsibilities.

Responsibilities are allocated according to each individual's actual involvement in the relevant activities and decision-making processes.

#### 9. Cooperation with Donors

The Foundation is committed to maintaining transparency and is prepared to provide donors, partners, and other stakeholders with information demonstrating compliance with applicable laws, funding conditions, and the Foundation's internal governance policies.

In implementing donor-funded projects, the Foundation complies with donor requirements relating to reporting, procurement, financial management, monitoring, internal controls, and compliance, provided that such requirements do not conflict with the legislation of the Republic of Kazakhstan.

#### 10. Final Provisions

This Compliance Statement reflects the Foundation's institutional approach to compliance, governance, accountability, and internal control and may be provided to donors, partners, financial institutions, auditors, and other interested stakeholders as evidence of the Foundation's governance framework.

The Foundation confirms its commitment to complying with all applicable legal, contractual, and ethical requirements and to maintaining the highest standards of transparency, integrity, accountability, and responsible organizational management.