



APPROVED
by the Decision of the Director
of the International Research Hub Public Foundation
10.12.2025

CONFLICT OF INTEREST POLICY
of the International Research Hub Public Foundation

Astana, 2025

1. General Provisions

1.1.

This Conflict of Interest Policy (the Policy) establishes the legal and organizational framework for identifying, disclosing, managing, and resolving conflicts of interest arising in the activities of the International Research Hub Public Foundation (the Foundation).

1.2.

The purpose of this Policy is to promote integrity, independence, impartiality, and accountability in decision-making, safeguard the Foundation's reputation, and ensure compliance with the legislation of the Republic of Kazakhstan, donor requirements, and internationally recognized standards of good governance.

1.3.

This Policy applies to the Director of the Foundation, employees, experts, consultants, contractors, volunteers, members of advisory bodies, and any other individuals participating in the implementation of projects or making decisions on behalf of the Foundation.

1.4.

This Policy shall be applied in conjunction with the Foundation's Financial Management Policy, Procurement Policy, Code of Ethics, and other internal policies and procedures and shall be interpreted in light of the Foundation's statutory objectives.

2. Definition of Conflict of Interest

2.1.

For the purposes of this Policy, a conflict of interest means any situation in which the personal interests of an individual acting on behalf of the Foundation interfere with, could interfere with, or could reasonably be perceived as interfering with the individual's ability to act objectively, independently, and in the best interests of the Foundation.

2.2.

A personal interest may be direct or indirect and may arise from financial, professional, business, family, personal, property, or any other relationships capable of influencing decision-making.

2.3.

For the purposes of this Policy, actual, potential, and perceived conflicts of interest shall all be treated as conflicts requiring appropriate disclosure and assessment.

3. Principles for the Prevention and Management of Conflicts of Interest

3.1.

The Foundation's approach to preventing conflicts of interest is based on the principle of integrity, requiring all individuals acting on behalf of the Foundation to act honestly, in good faith, and in the best interests of the Foundation and its statutory mission.

3.2.

The principle of disclosure requires timely, complete, and transparent disclosure of any actual, potential, or perceived conflict of interest, regardless of whether it has affected a decision.

3.3.

The principle of prevention requires reasonable measures to eliminate or minimize the influence of personal interests on decision-making, including voluntary recusal where appropriate.

3.4.

The principle of proportionality requires that any measures adopted to address a conflict of interest be appropriate to the nature and level of the identified risk without imposing unnecessary administrative burdens.

3.5.

The principle of documentation requires that disclosures of conflicts of interest and all related decisions be appropriately documented and retained.

4. Duty to Disclose Conflicts of Interest

4.1.

All persons subject to this Policy shall promptly disclose any actual, potential, or perceived conflict of interest upon becoming aware of it.

4.2.

Disclosure shall be made in writing, including by completing a Conflict of Interest Disclosure Form or through any other documented method that allows the disclosure to be properly recorded.

4.3.

The duty to disclose applies regardless of whether the conflict has influenced a decision or merely has the potential to do so.

4.4.

Failure to disclose a conflict of interest or the provision of false or misleading information may constitute a violation of this Policy.

5. Management of Conflicts of Interest

5.1.

Any individual who has disclosed a conflict of interest shall refrain from participating in the preparation, discussion, evaluation, recommendation, approval, or implementation of any matter affected by that conflict unless otherwise authorized under this Policy.

5.2.

Conflicts of interest shall be managed through appropriate measures designed to eliminate or minimize the risk of undue influence, including reassignment of responsibilities, recusal from decision-making, independent review, enhanced oversight, or any other proportionate measures appropriate to the circumstances.

5.3.

Decisions regarding the management of conflicts of interest shall be made by the Director of the Foundation or another duly authorized person based on the information available and in accordance with the principle of proportionality.

5.4.

Where the conflict of interest concerns the Director of the Foundation, the matter shall be addressed in accordance with the Foundation's Charter or, where appropriate, through an independent assessment or review.

6. Allocation of Responsibilities

6.1.

Individuals participating in the Foundation's activities shall be responsible for the timely disclosure of conflicts of interest and for the accuracy and completeness of the information provided.

6.2.

Individuals responsible for preparing reports, recommendations, expert opinions, evaluations, procurement documents, or other materials shall ensure that such work is objective, impartial, and free from undisclosed personal interests.

6.3.

The Director shall oversee the implementation of this Policy, ensure that appropriate procedures are in place for identifying and managing conflicts of interest, and make decisions based on the information provided.

6.4.

The Director shall not be responsible for undisclosed conflicts of interest where the relevant individual has failed to fulfil the obligation to disclose and no obvious indicators of such conflict were reasonably apparent.

7. Documentation

7.1.

The Foundation shall maintain appropriate records relating to conflict of interest disclosures, assessments, decisions, and mitigation measures.

7.2.

Documentation relating to conflicts of interest shall be retained as part of the relevant project documentation or the Foundation's internal records management system in accordance with applicable retention requirements.

8. Cooperation with Donors

8.1.

The Foundation shall comply with applicable donor requirements relating to the identification, disclosure, and management of conflicts of interest and shall provide supporting documentation where required.

8.2.

The Foundation shall maintain transparent decision-making processes and, where appropriate, be able to demonstrate either the absence of conflicts of interest or that identified conflicts have been properly disclosed and effectively managed.

9. Monitoring Compliance

9.1.

Compliance with this Policy shall be monitored as part of the Foundation's overall internal control and governance framework.

9.2.

Failure to comply with this Policy may be taken into account when assessing individual performance, determining continued participation in Foundation activities, or making other management decisions, as appropriate.

10. Final Provisions

10.1.

This Policy shall be approved by the Director of the International Research Hub Public Foundation and shall enter into force on the date of its approval unless otherwise specified in the approving decision.

10.2.

Any amendments or additions to this Policy shall be adopted in accordance with the same procedure applicable to its approval.

10.3.

Any matters not expressly governed by this Policy shall be regulated by the legislation of the Republic of Kazakhstan, the Foundation's Charter, and the Foundation's other internal policies and procedures.

I, _____,
(Full Name)

in connection with my participation in the activities of the International Research Hub Public Foundation (the Foundation), including the following project (where applicable):

hereby declare the following:

1. Declaration of Conflict of Interest

- ☐ To the best of my knowledge, I am not aware of any actual, potential, or perceived conflict of interest that could impair, or reasonably be perceived as impairing, my independence, objectivity, or impartiality in carrying out my responsibilities.
- ☐ I declare that I have an actual, potential, or perceived conflict of interest, as described below:

(Please describe the relevant circumstances.)

2. Understanding of a Conflict of Interest

For the purposes of this Declaration, a conflict of interest means any situation in which a personal interest, whether direct or indirect, could influence, or reasonably be perceived as influencing, the independent, objective, or impartial performance of duties or decision-making on behalf of the Foundation.

Examples of conflicts of interest may include, but are not limited to:

- financial or economic interests;
- ownership, employment, consultancy, or participation in organizations connected with the relevant project or activity;
- family, personal, professional, or business relationships with project participants, suppliers, contractors, donors, beneficiaries, or other stakeholders;
- the receipt of gifts, hospitality, benefits, or other advantages;
- any other circumstances that may compromise, or reasonably appear to compromise, independence or impartiality.

3. Declaration of Commitments

I undertake to:

- act honestly, in good faith, and in the best interests of the Foundation;
- promptly disclose any actual, potential, or perceived conflict of interest that arises or becomes known to me;
- refrain from participating in any decision-making process, evaluation, procurement procedure, project activity, or other matter in which I have a conflict of interest unless expressly authorized in accordance with the Foundation's policies;
- refrain from using confidential or non-public information obtained through the Foundation for personal benefit or for the benefit of third parties;
- comply with the legislation of the Republic of Kazakhstan and the Foundation's internal policies and procedures.

4. Declaration of Accuracy

I declare that the information provided in this Disclosure Form is complete, accurate, and true to the best of my knowledge as of the date of signature.

I further undertake to notify the Foundation promptly should any information contained in this Declaration change.

5. Final Provisions

This Disclosure Form is submitted for the purpose of ensuring transparency, integrity, accountability, and compliance with the Foundation's Conflict of Interest Policy and may be used for internal governance, compliance monitoring, audit purposes, and donor reporting, where applicable.

Date: _____

Full Name: _____

Position / Role: _____

Signature: _____



APPENDIX 2
to the Conflict of Interest Policy
CONFLICT OF INTEREST DISCLOSURE NOTICE

1. General Information

I, _____,
in connection with my participation in the activities of the International Research Hub Public Foundation (the Foundation), including the following project or activity:

_____ hereby notify the Foundation of circumstances that may constitute an actual, potential, or perceived conflict of interest.

2. Description of the Circumstances

Please provide details of the circumstances giving rise to the conflict of interest:

I acknowledge that the circumstances described above may influence, or reasonably be perceived as influencing, my independence, objectivity, or impartiality in the performance of my duties or in decision-making on behalf of the Foundation.

3. Nature of the Interest

The disclosed circumstances involve the following type of personal interest:

☐ Direct interest

☐ Indirect interest

Additional Information (if applicable):

4. Declaration

I hereby confirm that the information provided in this Notice is complete, accurate, and true to the best of my knowledge as of the date of submission.

I further undertake to notify the Foundation promptly should any of the circumstances described in this Notice change or should any additional actual, potential, or perceived conflict of interest arise.

5. Signature

Full Name: _____

Position / Role: _____

Signature: _____

Date: _____

6. Acknowledgement of Receipt

Received by:

Full Name: _____

Position: _____

Signature: _____

Date: _____



APPENDIX 2
to the Conflict of Interest Policy
CONFLICT OF INTEREST DISCLOSURE NOTICE

1. General Information

I, _____,
(Full Name, Position / Role)
in connection with my participation in the activities of the International Research Hub Public Foundation (the Foundation), including the following project or activity:
hereby notify the Foundation of circumstances that may constitute an actual, potential, or perceived conflict of interest.

2. Description of the Circumstances

Please describe the circumstances giving rise to the conflict of interest:

The circumstances described above may influence, or reasonably be perceived as influencing, my independence, objectivity, or impartiality in the performance of my duties or in decision-making on behalf of the Foundation.

3. Nature of the Personal Interest

I declare that the circumstances described above involve the following type of personal interest:

☐ Direct Interest

☐ Indirect Interest

Additional Information (if applicable):

4. Declaration

I hereby declare that the information provided in this Notice is complete, accurate, and true to the best of my knowledge as of the date of submission.

I acknowledge my continuing obligation to notify the Foundation promptly should any of the circumstances described herein change or should any additional actual, potential, or perceived conflict of interest arise.

5. Signature

Full Name: _____

Position / Role: _____

Signature: _____

Date: _____

6. Acknowledgement of Receipt

This Notice was received by:

Full Name: _____

Position: _____

Signature: _____

Date: _____

DECISION ON THE MANAGEMENT OF A CONFLICT OF INTEREST

1. Basis for the Decision

This Decision is made following the review of the Conflict of Interest Disclosure Notice submitted by:

Full Name: _____

Date of Disclosure: _____

2. Assessment of the Circumstances

Following a review of the information provided, it has been determined that the circumstances constitute:

- ☐ An actual conflict of interest
- ☐ A potential conflict of interest
- ☐ A perceived conflict of interest

Summary of the Circumstances:

3. Assessment of the Impact

It has been determined that the identified circumstances:

- ☐ May affect, or reasonably be perceived as affecting, the independence, objectivity, or impartiality of the relevant decision-making process or activity.
- ☐ Do not present a material risk, provided that the following mitigation measures are implemented.

4. Decision

In order to prevent or appropriately manage the identified conflict of interest, the following decision has been made:

- ☐ Require the individual to recuse themselves from the relevant decision-making process, activity, or procedure.
- ☐ Permit participation subject to the following restrictions or conditions:

- ☐ Permit participation subject to the implementation of the following mitigation measures:

- ☐ Other:

5. Conclusion

The measures adopted are considered appropriate and proportionate to prevent, eliminate, or adequately mitigate the identified conflict of interest and to safeguard the integrity, independence, and objectivity of the Foundation's activities.

Decision adopted by:

Full Name: _____

Position: _____ Signature: _____

Date: _____

DECISION ON THE MANAGEMENT OF A CONFLICT OF INTEREST

1. Basis for the Decision

This Decision is made following the review of the Conflict of Interest Disclosure Notice submitted by:

Full Name: _____

Date of Disclosure: _____

2. Assessment of the Circumstances

Following consideration of the information provided, it has been determined that the disclosed circumstances constitute:

- ☐ An actual conflict of interest
- ☐ A potential conflict of interest
- ☐ A perceived conflict of interest

Summary of the Circumstances:

3. Assessment of the Impact

It has been determined that the identified circumstances:

- ☐ May affect the independence, objectivity, or impartiality of decision-making or the performance of the relevant duties.
- ☐ Do not present a material risk, provided that the applicable restrictions and mitigation measures are observed

4. Decision

In order to prevent or appropriately manage the identified conflict of interest, the following decision has been made:

- ☐ Recuse the individual from participating in the relevant decision-making process, procedure, or activity.
- ☐ Restrict the individual's participation as follows:

- ☐ Permit the individual's participation subject to the implementation of the following mitigation measures:

- ☐ Other:

5. Conclusion

The measures adopted are considered appropriate and sufficient to prevent, eliminate, or effectively mitigate the impact of the identified conflict of interest on the Foundation's activities.

Decision made by: _____
Full Name: _____
Position: _____
Signature: _____
Date: _____

CONFLICT OF INTEREST REGISTER

The Register shall be maintained to ensure transparency, accountability, traceability, and appropriate documentation of identified, disclosed, and managed conflicts of interest arising in the Foundation's activities.

No.	Date of Disclosure	Name of the Individual	Project / Matter	Summary of the Conflict of Interest	Decision / Mitigation Measures	Status
1						
2						
3						
4						

Decision made by: _____

Full Name: _____

Position: _____

Signature: _____

Date: _____