

APPROVED  
by the decision of the Executive Committee  
«Association of Legal Entities «Kazakhstan  
Football Federation»  
As of 03.11.2023, minutes № 6/14

**POLICY OF THE KAZAKHSTAN FOOTBALL FEDERATION  
ON PREVENTION AND SETTLEMENT  
OF CONFLICTS OF INTEREST**



**Astana city, 2023**

## GENERAL CONCEPTS

**Administrative and household functions** - the right to manage and dispose of the property on the KFF's balance sheet in accordance with the procedure established by the law of the Republic of Kazakhstan;

**Close family members / relatives**- Parents (parent), children, adoptive parents (adoptive parents), adopted children, full and half brothers and sisters, grandparents, grandchildren;

**Office holder** - a person who permanently or temporarily performs organizational, managerial or administrative functions in the KFF;

**Employee** - an individual who has an employment relationship with KFF and directly performs work under an employment contract;

**Staff member / co-worker**- a natural person providing services to KFF on the basis of a service contract;

**Supreme Management Authority** - Conference;

**Executive Management Authority** - Executive Committee (EC);

**Chief Executive Officer** - President;

**Supervisory Authority** - Revision Commission;

**Administrative Authority** - General Secretary;

**Compliance Officer** - a person appointed by order of KFF to ensure compliance with mandatory regulatory requirements and international best practices, including on anti-corruption issues, formation of KFF's internal corporate culture, which ensures transparency, honesty among all employees and creates conditions for conducting business in accordance with the best international standards, internal policies and legislation of the Republic of Kazakhstan;

**Conflict of interests** - contradiction between personal interests of officials and employees and their official powers, where personal interests of the above persons may lead to non-performance and (or) improper performance of their official duties;

**Personal interests** - personal property benefits or interest in obtaining personal benefits from KFF, not related to the receipt of wages and other payments established by KFF internal documents;

**Organizational and administrative functions** - The right to issue orders and instructions, make decisions both individually and collegially, in accordance with the procedure established by the law of the Republic of Kazakhstan;

**Declaration** - Statement of adherence to the Policy of the Kazakhstan Football Federation on prevention and settlement of conflicts of interest signed annually.

Terms used but not defined in this Policy shall be used in the sense in which they are used in the legislation of the Republic of Kazakhstan and KFF internal documents.

## **Chapter 1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS**

1. This Policy of the Kazakhstan Football Federation on prevention and settlement of conflicts of interest (hereinafter - the Policy) is developed in accordance with the laws of the Republic of Kazakhstan "On Combating Corruption", "On non-profit organizations", and other normative legal acts of the Republic of Kazakhstan.

2. The present Policy is designed to prevent conflicts of interest and is one of the key mechanisms of the Kazakhstan Football Federation (hereinafter - KFF) to combat corruption. Serious violations related to conflict of interest may damage the business reputation of KFF and undermine the credibility of all stakeholders. Personal interests of an official, employee or staff member shall not influence the performance of their official, functional duties based on the principles of impartiality, honesty and protection of KFF's interests.

3. The present Policy defines situations of conflicts of interest, measures for their prevention and settlement, as well as the responsibility of all participants of the conflict of interest settlement process.

4. KFF understands that officers, employees or staff may have legitimate personal interests outside the performance of their duties/duties at KFF, but any conflict of interest between such personal interests and duties/duties at KFF shall be disclosed and managed in accordance with this Policy.

5. In its relations with business partners, counterparties and third parties, KFF relies on the establishment and preservation of trusting relationships in which the parties are obliged to act towards each other with the utmost honesty, integrity, fairness and loyalty, as well as to take exhaustive measures to prevent, identify and eliminate conflicts of interest.

## **Chapter 2. SCOPE OF APPLICATION**

6. The present Policy is mandatory for familiarization and strict compliance by all officers, employees or staff of KFF.

7. The current Policy may be applied in combination with the KFF Ethics Code.

## **Chapter 3. MAIN PRINCIPLES OF SETTLEMENT OF CONFLICT OF INTERESTS**

8. The KFF manages conflicts of interest (prevention and resolution) based on the following key principles of conflict of interest management:

1) principle of legality - compliance of this Policy with the legislation of the Republic of Kazakhstan and KFF internal documents;

2) the principle of protecting the interests of KFF. Protection of KFF's interests is the duty of every official, employee or staff member, who are obliged to make decisions based only on the legislation of the Republic of Kazakhstan and internal documents of KFF, and not based on personal preferences;

3) the principle of objectivity and individual consideration - each case of a conflict of interest should be considered on an individual basis with an assessment of potential risks to the KFF and resolved in a timely manner. Officials, employees or collaborators should strive to minimize any subjectivity that distorts the actual situation of the conflict of interest, including any influence of personal and other interests and various factors on the process and results of the conflict of interest study;

4) principle of confidentiality - strict observance of confidentiality: from the process of disclosure of conflict of interest and the process of further settlement of conflict of interest to the stage of summarizing the results and taking the final decision on the situation under consideration;

5) principle of involvement - awareness of KFF officials, employees or staff about the provisions of anti-corruption legislation;

6) Principle of intolerance and internal culture - KFF fosters a culture and a high degree of intolerance to the appearance of conflicts of interest in its work environment. KFF welcomes

disclosure of possible conflicts of interest by its officers, employees or coworkers and develops an internal culture of open communication aimed at their understanding of the provisions of this Policy;

7) the principle of personal example - senior management and officials by their actions serve as a personal example of integrity and ethical behavior, demonstrate commitment to professionalism and strictly comply with the requirements of this Policy;

8) the principle of personal responsibility and inevitability of punishment - the immediate supervisor of the official, employee or staff member who allowed the fact of conflict of interest shall be personally liable for untimely identification and disclosure, as well as for improper settlement of the conflict of interest. All officers, employees or staff members shall be personally responsible for balancing their personal interest with the interests of KFF.

#### **Chapter 4. SITUATIONS OF CONFLICT OF INTERESTS**

9. For the purposes of this Policy, situations that may lead to a conflict of interest include the following situations in which:

1) an official, employee or collaborator holds positions that are directly subordinate to positions held by their close relatives, spouse or in-laws;

2) an official, employee, collaborator or their close relatives, spouse, as well as in-laws, has or may have any commercial or other interest (direct or indirect) in transactions, projects related to the KFF;

3) The officer, employee, staff member, or their immediate family members, spouse, and in-laws are a party to a project or transaction involving KFF;

4) an officer, employee, collaborator or their close relatives, spouse, and in-laws are affiliated with an organization that is a party to a KFF-related project or transaction;

5) an officer, employee or staff member discloses confidential information that became known to him/her due to the performance of his/her duties/official duties, or any other information, the disclosure of which may have a negative impact on the interests of KFF, as well as any use by an officer, employee, staff member or their close relatives, spouse, in-laws of confidential information related to KFF for personal gain;

6) an officer, employee or staff member participates in the discussion or decision on his/her performance evaluation, reappointment (re-election), remuneration or other matters concerning himself/herself;

7) an officer, employee or staff member combines executive and supervisory functions, allowing the use of his/her official duties for the purpose of personal gain.

10. The conflict of interest situations listed in paragraph 11 of this Policy are not exhaustive. To determine whether a conflict of interest exists, officers, employees and staff shall be guided by the term conflict of interest as set forth in paragraph 8 of this Policy.

#### **Chapter 5. PROCEDURE FOR DISCLOSURE (DECLARATION) OF CONFLICTS OF INTEREST**

13. Disclosure of information on conflict of interest by officials, employees and staff members shall be made immediately in writing, with detailed justification and documentary evidence of the existence or occurrence of a conflict of interest

1) The KFF shall establish the following procedure for disclosure (declaration) of conflicts of interest первичное раскрытие сведений о конфликте интересов при приеме на работу;

2) disclosure of information on conflict of interest in case of transfer to a higher position, to another structural subdivision, in case of change of function;

3) annual disclosure of conflicts of interest related to the high level of corruption risk in the business processes/business operations of the KFF, in the implementation or execution of which there is the highest probability of creating conditions for a conflict of interests;

4) one-time disclosure of information as situations listed in clause 11 of this Policy arise,

where the existence of personal interest may lead or has led to a conflict of interest. One-time disclosure shall be made by filling in the Notice provided in the Appendix to this Policy.

**14.** Concealment and/or untimely, incomplete disclosure of information on the existence of a direct or potential conflict of interest by officials, employees and staff members are the causes and conditions of corruption risks that contribute to the commission of corruption offenses in the KFF.

## **Chapter 6. PREVENTION OF CONFLICTS OF INTEREST**

**15.** In order to prevent conflicts of interest, the responsible structural subdivisions of the KFF shall be obliged to:

1) when hiring, promoting or changing job responsibilities, avoid appointing employees who are directly related to the immediate supervisor or person performing related functions to positions;

2) when inspecting KFF counterparties at the stages of conducting procurement procedures and formalizing contractual relations with them, to examine the composition of their founders and managers for signs of affiliation with officials, employees and staff, their close relatives, spouses, as well as in-laws;

3) to carry out preventive and prophylactic measures and performance audits aimed at detecting and suppressing unlawful' unfair or incompetent activities of officials, workers and employees, including those who receive additional income in the form of material benefits as a result of misuse of their official position;

4) ensure that each officer, employee, and employee is familiarized with this Policy at the time of hire;

5) conduct regular explanatory work aimed at communicating the provisions of this Policy to officers, employees and staff;;

6) record information on affiliated persons, KFF insiders;

7) ensure safety of confidential information, also personal data of officials, workers and employees.

## **Chapter 7. DUTIES OF OFFICIALS, EMPLOYEES AND EMPLOYEES TO PREVENT THE OCCURRENCE OF A CONFLICT OF INTEREST**

**16.** Officers, employees and staff members are prohibited from participating in the consideration and decision-making of any transaction between KFF and themselves or any of their immediate family members, spouses and in-laws.

**18.** Officials, workers and employees are obliged to:

1) upon appointment, signing an employment contract or service contract, sign the Declaration (Appendix No. 2 to this Policy), subject to its annual re-signing;

2) to prevent situations of conflict of interests;

3) to refrain from participating in consideration of issues in which they have a conflict of interest and making decisions thereon;

4) not to participate in decision-making related to their own appointment, election and re-election;

5) to bring information on the existing conflict of interest in writing to the administrative body in advance and not to participate in decision making on the issue in accordance with the requirements of this Policy;

6) monitor possible loss of independence status and notify the administrative body of the KFF in advance if such situations exist;

7) submit to the KFF information on its affiliates in accordance with the established procedure;

8) confirm in writing familiarization with the KFF procedures on conflict of interest settlement and the obligation to comply with them;

- 9) Implement a culture of zero tolerance of conflict of interest by personal example;
- 10) to report information on violations of the requirements of this Policy or the potential possibility of such violations in the manner and on the terms stipulated by this Policy;
- 11) comply with the procedure for protection of insider and confidential information.

**19.** An employee of KFF shall have the right to work in other organizations only in accordance with the legislation of the Republic of Kazakhstan, and in doing so shall be obliged to comply with paragraph 18 of this Policy.

**20.** Officials may not act on behalf and in the interests of third parties in relations with the KFF.

**21.** Interference of officials in the activities of the KFF structural subdivisions, both within and outside their direct subordination, in order to influence decision-making on the conclusion of an interested-party transaction by the KFF is prohibited.

## **Chapter 8. PROCEDURE FOR REVIEWING AND REGULATING CONFLICTS OF INTEREST**

**22.** In order to increase the effectiveness of work on the identification, prevention and settlement of conflicts of interest, the KFF strives to create mechanisms for their timely and complete identification, as well as for clear coordination of actions of all KFF bodies/units to resolve them.

**23.** In order to manage conflicts of interest arising in the KFF, officials must:

- 1) identify emerging conflicts of interest, determine their causes;
- 2) clearly delineate the competence and responsibility of the KFF bodies;
- 3) ensure that officials, employees and staff abstain from participation in consideration of and decision-making on issues in which they have a conflict of interest.

**24.** An employee shall immediately inform his/her immediate supervisor of the existence or occurrence of a conflict of interest in order to resolve such conflict of interest.

**25.** In case of impossibility to settle a conflict of interest at the level of a structural subdivision, the head of the structural subdivision shall be obliged within one working day to submit to the Secretary General and/or other authorized person information on the conflict of interest, reasons for its occurrence, measures that have been undertaken.

**26.** The Secretary General shall determine the procedure for settlement of conflict of interests, appoint an authorized person. If necessary, the Secretary General shall establish a working group for settlement of conflict of interests, which shall include representatives of the Finance Department, Legal Department, Compliance Officer. The composition of the working group shall be formed in such a way as to exclude the possibility of a conflict of interest that may affect the decisions taken by the group.

## **Chapter 9. POSSIBLE MEASURES TO MANAGE CONFLICTS OF INTEREST**

**27.** In determining measures to manage conflicts of interest, the KFF shall ensure that they are proportionate to the degree of negative consequences that may affect the interests of the KFF.

**28.** Possible measures and methods taken to manage conflicts of interest:

- 1) re-election or transfer of a KFF official or employee with his/her consent to another position in accordance with the procedure established by the legislation of the Republic of Kazakhstan, involving the performance of functions that exclude the conflict of interests;
- 2) termination of powers of an official or employee in accordance with the procedure established by the legislation of the Republic of Kazakhstan;
- 3) voluntary refusal, suspension (permanent or temporary) of an official or employee from participation in the discussion of issues in which they have or may have a conflict of interest and

decision-making thereon;

4) Reviewing and modifying the duties/responsibilities of an officer or employee;

**29.** The list of measures given in clause 28 of the Policy is not exhaustive. In each specific case, other measures may be applied depending on the specifics of the situation and the degree of adequacy of the measures taken for the purposes of conflict of interest resolution.

### **Chapter 10. LIABILITY**

**30.** Authorized officers, workers and employees shall be responsible for the implementation of this Policy.

If in the work on prevention or settlement of conflict of interests there are violations of the requirements of the legislation of the Republic of Kazakhstan, as well as this Policy, which resulted in causing losses to KFF, the persons guilty of such violation shall be held liable in accordance with the legislation of the Republic of Kazakhstan.

### **Chapter 11. FINAL PROVISIONS**

**31.** Amendments and additions to this Policy shall be made by decision of the Executive Committee.

**32.** If, as a result of changes in the legislation of the Republic of Kazakhstan or the KFF Charter, some norms of this Policy come into conflict with them, it is necessary to be guided by the norms of the legislation of the Republic of Kazakhstan or the KFF Charter before making appropriate amendments and additions to this Policy.

To whom: \_\_\_\_\_

\_\_\_\_\_

(Job title, Full name)

From: \_\_\_\_\_

\_\_\_\_\_

(Full name, Job title, contact phone number)

**NOTIFICATION**  
**on the existence or occurrence of a conflict of interests**

Hereby, in accordance with the requirements of the Policy of the Kazakhstan Football Federation on Prevention and Settlement of Conflict of Interest, I hereby inform about the occurrence of my personal interest, which leads or may lead to a conflict of interest, in the performance of my official duties.

1. The circumstances that give rise to the conflict situation (personal interest): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
*(Describing the situation in which a conflict of interest has arisen or may arise, with detailed justification).*

2. Official duties, performance of which is or may be affected by personal interest:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*(listing of specific job duties).*

3. Measures taken (proposed) to prevent or resolve conflicts of interest: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*(indicate what measures the official/employee or staff member has taken or proposes to take to prevent or manage the conflict of interest).*

4. List of documents confirming the facts of existence or occurrence of a conflict of interest, as well as on the measures taken (proposed to be taken) to prevent and settle the conflict of interest:

1) \_\_\_\_\_

2) \_\_\_\_\_

3) \_\_\_\_\_



4) \_\_\_\_\_  
5) \_\_\_\_\_

Person, who issues the notification:

\_\_\_\_\_ « \_\_\_\_ » \_\_\_\_\_ 20 \_\_\_\_ г.  
(Signature, signature interpretation)

Person, who receives the notification:

\_\_\_\_\_ « \_\_\_\_ » \_\_\_\_\_ 20 \_\_\_\_ г.  
(Signature, signature interpretation)



**DECLARATION ON ADHERENCE TO THE POLICY OF THE KAZAKHSTAN FOOTBALL  
FEDERATION  
ON PREVENTION AND SETTLEMENT OF CONFLICT OF INTERESTS**

I, \_\_\_\_\_

(Full name, job title)

Individual Identification Number (IIN) \_\_\_\_\_, a native of

\_\_\_\_\_, hereby adhere to the Kazakhstan Football Federation's Policy on Prevention and Settlement of Conflict of Interest and undertake to:

- to avoid situations of conflict of interest;
- to refrain from participating in consideration and decision-making on issues where there is a conflict of interest;
- to not participate in decisions related to their own appointment, election and re-election;
- to provide the Kazakhstan Football Federation with information on its affiliates, if necessary;
- to support the culture of FIFA, UEFA and the Kazakhstan Football Federation by personal example, intolerance to corruption and avoidance of conflicts of interest that may lead to harm to the rights and legitimate interests of citizens, subjects of football, organizations, Kazakhstan society, the Republic of Kazakhstan, FIFA, UEFA, as well as other international sports organizations.
- to inform one's immediate supervisor about violations of the requirements of the Policy of the Kazakhstan Football Federation on prevention and settlement of conflict of interests or potential possibility of such a violation;
- to comply with the procedure for protection of confidential and proprietary information;
- to comply with other requirements of the regulations of the Kazakhstan Football Federation, FIFA and UEFA on combating corruption.

City: \_\_\_\_\_, «\_\_\_\_» \_\_\_\_\_ year 20\_\_\_\_ (signature)