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

ANTI-MONEY LAUNDERING, COUNTER-TERRORIST FINANCING AND SANCTIONS POLICY (AML/CFT & SANCTIONS POLICY)
of the International Research Hub Public Foundation

Astana, 2025

1. General Provisions

1.1. This Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy (the Policy) establishes the principles, approaches, and internal procedures of the International Research Hub Public Foundation (the Foundation) designed to prevent the use of the Foundation, its resources, infrastructure, and projects for the purposes of money laundering, terrorist financing, sanctions evasion, or other illicit financial activities.

1.2. This Policy has been developed in accordance with the legislation of the Republic of Kazakhstan, including legislation on anti-money laundering and counter-terrorist financing, the Recommendations of the Financial Action Task Force (FATF), including Recommendation 8 relating to non-profit organizations, applicable international sanctions regimes, and internationally recognized best practices of donor-funded and charitable organizations.

1.3. This Policy applies to all activities of the Foundation, including fundraising, receipt and use of funding, project implementation, and cooperation with donors, partners, contractors, beneficiaries, and other stakeholders.

1.4. The Foundation conducts its activities in accordance with the principles of integrity, transparency, accountability, and lawful conduct and shall not knowingly participate in transactions or arrangements intended to conceal the origin of funds, circumvent sanctions, or facilitate any unlawful purpose.

1.5. This Policy does not establish the Foundation as a reporting entity or financial monitoring institution within the meaning of the legislation of the Republic of Kazakhstan. Rather, it establishes internal due diligence, sanctions screening, and risk management procedures appropriate to the nature and scope of the Foundation's activities.

2. AML/CFT Principles

2.1. The Foundation shall conduct its activities in accordance with the principles of legality and compliance with the legislation of the Republic of Kazakhstan, applicable international sanctions, and relevant international obligations.

2.2. The Foundation applies a risk-based approach by identifying, assessing, and proportionately managing risks associated with funding sources, counterparties, beneficiaries, jurisdictions, and project activities.

2.3. The Foundation shall ensure transparency of financial transactions, adequate documentary support, and traceability of funds from the original funding source to their final use.

2.4. Internal control measures shall be proportionate to the Foundation's activities and risks and shall avoid creating unnecessary administrative burdens that could impede the Foundation's statutory mission.

2.5. The Foundation applies the principle of due diligence, taking reasonable measures to establish the integrity, legitimacy, and reliability of donors, partners, contractors, and other counterparties on the basis of available information.

2.6. The Foundation shall maintain appropriate documentation demonstrating compliance with this Policy for the benefit of donors, partners, auditors, and other legitimate stakeholders.

3. Risk Assessment and Risk Management

3.1. The Foundation shall periodically assess risks associated with fundraising, financial transactions, project implementation, and relationships with donors, beneficiaries, contractors, and partners.

3.2. Risk assessments shall take into account the Foundation's activities, funding sources, geographical exposure, transaction structures, counterparties, sanctions exposure, and any other factors relevant to the overall level of AML/CFT risk.

3.3. Higher-risk circumstances may include, among others:

- funding received through unusually complex or non-transparent arrangements;
- involvement of intermediaries without a clear legitimate business purpose;

- inconsistencies between the declared objectives and the actual activities of a donor or counterparty;
- counterparties or donors established in or connected with high-risk jurisdictions or jurisdictions subject to international sanctions.

3.4. Where elevated risks are identified, the Foundation may implement enhanced due diligence measures, request additional supporting documentation, suspend transactions, or decline to establish or continue the relevant relationship.

4. Due Diligence of Donors, Partners, and Counterparties
4.1. The Foundation shall conduct due diligence on donors, partners, contractors, and other counterparties to the extent necessary to establish their legal status, business reputation, beneficial ownership (where appropriate), legitimacy of funding sources, and sanctions exposure.
4.2. Due diligence shall be based on publicly available information, official registers, information provided by the relevant parties, and other reliable sources available to the Foundation.
4.3.Where appropriate, the Foundation may screen individuals and organizations against applicable international sanctions lists, watchlists, and other publicly available restrictive measures.
4.4. The extent of due diligence shall be determined according to the level of risk, the nature and duration of the relationship, the amount of funding involved, and any other relevant circumstances.
4.5. The results of due diligence shall be documented to the extent necessary to demonstrate that the Foundation has acted reasonably, diligently, and in good faith.

5. Financial Transactions and Internal Controls
5.1. All financial transactions shall be carried out exclusively in furtherance of the Foundation's statutory purposes and shall be supported by appropriate documentation.
5.2. The Foundation shall maintain separate accounting records for projects and funding sources to ensure transparency and traceability of financial resources.
5.3. Cash transactions shall be limited to situations expressly permitted by the legislation of the Republic of Kazakhstan and justified by operational necessity.
5.4. Transactions lacking a clear economic rationale or legitimate connection with the Foundation's statutory activities shall be subject to enhanced review.

6. Response to Suspicious Activities
6.1. Where circumstances suggest that a transaction or relationship may be connected with unlawful activity, money laundering, terrorist financing, sanctions violations, or other financial crime, the Foundation may suspend the relevant activity pending internal review.
6.2. Following such review, the Foundation may decide to continue, modify, suspend, or terminate the relevant relationship or transaction.
6.3. Where required by the legislation of the Republic of Kazakhstan, the Foundation shall provide information to the competent public authorities.

7. Documentation and Record Retention
7.1.The Foundation shall retain records relating to financial transactions, due diligence procedures, sanctions screening, and other actions taken under this Policy for the periods required by the legislation of the Republic of Kazakhstan.
7.2. Such documentation shall be sufficient to demonstrate the lawful origin of funds, the legitimacy of their use, and compliance with this Policy.

8. Allocation of Responsibilities

8.1. The Director shall provide overall oversight of the Foundation's AML/CFT and sanctions compliance framework and shall make decisions based on the information and recommendations submitted.
8.2. Personnel participating in financial, contractual, procurement, fundraising, and project-related activities shall be responsible for the accuracy of information provided, the proper preparation of documentation, and compliance with this Policy within the scope of their assigned duties.
8.3. Due diligence procedures and risk assessments shall be carried out by designated personnel. The Director shall not be responsible for inaccurate or incomplete information supplied by third parties, provided that reasonable due diligence procedures have been applied.
8.4. Responsibility for compliance with this Policy shall be allocated according to each individual's actual role and participation in the relevant activities and processes.

9. Training and Awareness
9.1. The Foundation shall ensure that individuals participating in its activities are informed of the requirements of this Policy to the extent necessary for its effective implementation.
9.2. The scope, frequency, and format of AML/CFT training shall be determined in accordance with the scale of the Foundation's activities and the level of identified risks.

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. This Policy shall be interpreted and applied together with the Foundation's other internal policies and procedures.
10.4. Any matters not expressly governed by this Policy shall be regulated by the legislation of the Republic of Kazakhstan, the Foundation's Charter, and applicable international AML/CFT standards relevant to the Foundation's activities.

APPENDIX 1
to the Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy (AML/CFT & Sanctions Policy)

COUNTERPARTY DUE DILIGENCE FORM

1. General Information
Legal Name: ____
Legal Form: ____
Country of Incorporation / Registration: ________________________
Registration Number (if applicable): ____________________________
Registered Address / Contact Details: ___________________________

2. Authorized Representative / Primary Contact
Full Name: ____
Position: ____
Contact Details: ____
3. Nature of the Relationship
☐ Donor
☐ Contractor
☐ Partner
☐ Service Provider
☐ Supplier
☐ Beneficiary
☐ Other: ___________________________

Description of the Proposed Relationship:

4. Source of Funds (Applicable to Donors)
Description of the Source of Funding:

5. Due Diligence Review
Publicly Available Information Reviewed
☐ Information verified and consistent
☐ Potential risks identified
Summary of Findings:

6. Sanctions and Watchlist Screening
☐ No matches identified
☐ Match identified (please specify):

Sanctions / Watchlists Reviewed (where applicable):
☐ UN Security Council Sanctions List
☐ OFAC (United States)
☐ EU Consolidated Financial Sanctions List
☐ UK Sanctions List
☐ National Sanctions List
☐ Other: ___________________________

7. Risk Assessment
Overall Risk Rating
☐ Low
☐ Medium
☐ High
Risk Assessment Rationale:

8. Decision
☐ Relationship approved
☐ Relationship approved subject to enhanced due diligence and additional conditions
☐ Relationship not recommended
Comments (if applicable):

Prepared by: ____________________________________
Position: _______________________________________
Signature: ______________________________________
Date: ____

APPENDIX 2
to the Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy (AML/CFT & Sanctions Policy)

DECLARATION OF SOURCE OF FUNDS

I,____, acting on behalf of ____, hereby declare and confirm that the funds provided to the International Research Hub Public Foundation:

1. have been obtained from lawful and legitimate sources;
2. are not derived from, connected with, or intended to facilitate money laundering or any other criminal activity;
3. are not intended for, and will not be used in connection with, the financing of terrorism, the proliferation of weapons of mass destruction, sanctions evasion, or any other unlawful activity.

I further confirm that the information provided in this Declaration is true, complete, and accurate to the best of my knowledge. I acknowledge that any false, misleading, or incomplete information may result in the refusal or termination of cooperation with the Foundation and may give rise to liability under the applicable legislation.

Full Name: ______________________________________
Position / Title: _________________________________
Organization (if applicable): ______________________
Signature: _______________________________________
Date: ____

DUE DILIGENCE REGISTER FOR DONORS AND COUNTERPARTIES

The Register is maintained for the following purposes:

- documenting due diligence reviews conducted by the Foundation;
- ensuring the traceability of decisions relating to donors and counterparties;
- demonstrating compliance with the Foundation's due diligence, AML/CFT, and sanctions compliance procedures.

No.	Date of Review	Name of Donor / Counterparty	Category (Donor / Counterparty)	Risk Rating	Due Diligence Outcome	Responsible Person

APPENDIX 4
to the Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy (AML/CFT & Sanctions Policy)

INTERNAL AML/CFT INCIDENT REPORT

1. Description of the Incident

2. Persons / Entities Involved

3. Grounds for Concern

(Please describe the circumstances, red flags, unusual transactions, inconsistencies, sanctions concerns, or any other factors giving rise to suspicion.)

4. Preliminary Risk Assessment

☐ **Low Risk**
☐ **Medium Risk**
☐ **High Risk**

5. Recommended Action

☐ Continue the relationship
☐ Conduct enhanced due diligence
☐ Suspend the transaction or relationship pending further review
☐ Terminate the relationship
☐ Escalate the matter to the Director
☐ Other: ____

6. Additional Comments

Prepared by: ____________________________________
Position: ____
Signature: _**Date:**

DIRECTOR'S DECISION FOLLOWING DUE DILIGENCE REVIEW

Having reviewed the due diligence materials and supporting information submitted by the responsible officer, the Director hereby determines the following:

Findings

Decision

☐ **Approve the proposed relationship**

☐ **Approve the proposed relationship subject to the following conditions:**

☐ **Decline the proposed relationship**

☐ **Request enhanced due diligence before making a final decision**

☐ **Suspend consideration pending additional information**

Grounds for the Decision

Director of the Foundation: ________________________________

Signature: ____

Date: ____