

 <p>SATBAYEV UNIVERSITY</p>	<p align="center">MINISTRY OF EDUCATION AND SCIENCE OF THE REPUBLIC OF KAZAKHSTAN</p> <p align="center">NON-PROFIT JOINT STOCK COMPANY KAZAKH NATIONAL RESEARCH TECHNICAL UNIVERSITY named after K.I. SATPAYEV</p>	
<p align="center">QMS Document 3 level</p>	<p align="center">Edition № 1 <i>«03» 2018.</i></p>	<p align="center">C 029-07-02.3.01 – 2020</p>

Corporate Ethics Code
(KazNRTU Staff Ethics Rules)

C 029-07-02.3.01 – 2020

FOREWORD

1 DEVELOPED by the Corporate Development Department of the NJSC
“Kazakh National Research Technical University named after K.I. Satpayev”

2 APPROVED:

Responsible for translation
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« 31 » 01 2020

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3 APPROVED by the Decision of the Board « 13 » 02 2020. № 6

4 INTRODUCED to replace the edition № 2, 29.12.2017.

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MISSION OF THE CODE

Code of Corporate Ethics of NJSC “Kazakh National Research Technical University named after K.I. Satpayev” is a management tool necessary for effective interaction with stakeholders, as well as the main mechanism that contributes to a uniform understanding of the norms of business ethics and behavior, affecting the daily work of employees and the activities of the university.

VISION

The Code of Corporate Ethics is the most important tool for the formation of corporate culture, which helps to improve the efficiency of the corporate governance process and contributes to the successful interaction of the university with stakeholders.

1 GENERAL PROVISIONS

This code of corporate ethics was developed in accordance with the provisions of the current legislation of the Republic of Kazakhstan, internal documents of KazNRTU, including the Corporate Governance Code, and establishes the fundamental values and principles of corporate ethics, norms of business relationships.

The aim of this Code is to develop a culture of quality for effective interaction with stakeholders through the application of business practices and the development of a unified corporate culture based on high ethical standards, both in making strategic decisions and in every situation.

KazNRTU relies on the commitment of each official and employee to the following fundamental corporate values:

- competence and professionalism in the implementation of labor activities;
- reliability and impartiality in their actions;
- efficiency and effectiveness in increasing the level of professional skill, with a focus on RoadMap - KazNRTU development strategy;
- social responsibility for the activities of KazNRTU, aimed at maintaining and increasing the level of business reputation and positive image of the University in the professional community;
- trusting relationships and high cultural-moral characteristics to promote an atmosphere of trust and justice at KazNRTU;
- readiness for changes in accordance with the requirements of the present, as well as an orientation towards dynamism and a creative approach to the fulfillment of tasks and their official duties;
- honesty and respect for employees, stakeholders and KazNRTU as a

whole.

In carrying out its activities, KazNRTU:

- Complies with the norms of the Republic of Kazakhstan legislation,
- shareholders and government agencies and other documents related to the activities of KazNRTU;
- Ensures compliance with and respect for human rights;
- Acts fairly and in good faith, showing tolerance for corruption;
- Treats officials and employees fairly, with respect and compliance with ethical standards;
- Strives to ensure that all its relationships with stakeholders are mutually beneficial;
- Shows respect and cares for the environment;
- Focuses its professional activity on the result, which is expressed in the high quality of training of professional personnel, the fruits of scientific work and establishment of a high intellectual culture in society.

The Code is applied together with other internal documents and reflects the activities of the Officials and Employees of KazNRTU.

2 TERMS AND DEFINITIONS

The following terms and definitions are used in the Code:

- 1) **KazNRTU** – Non-profit joint stock company “Kazakh National Research Technical University named after K.I. Satpayev”;
- 2) **Business ethics** - a set of ethical principles and norms of business communication, which are guided in its activities by KazNRTU, its officials and employees;
- 3) **Officials** - members of the Board of Directors, members of the Management Board of KazNRTU;
- 4) **An interested person** - a person whose implementation of the rights provided for by legislation and the Charter is related to the activities of the University;
- 5) **Code**- codes of corporate ethics;
- 6) **Conflict of interests** - a situation in which the employee’s personal interest affects or may affect the impartial performance of official duties;
- 7) **Corporate culture** - these are specific values, principles, norms of behavior and attitudes for the university;
- 8) **Employee** - a person who is in an employment relationship with KazNRTU and is directly performing work under an employment contract;
- 9) **Disciplinary commission** - it is a consultative-advisory board that considers issues of strengthening labor and academic discipline, the implementation of the Law of the Republic of Kazakhstan “On Combating

Corruption” and labor legislation by employees and students of KazNRTU.

KazNRTU accepts and follows the provisions of this Code in relations with officials, employees and stakeholders, for making business decisions, both strategically important and in everyday situations faced by officials and employees.

This Code applies to all employees, regardless of their position. Adherence to the Code contributes to the formation and development of corporate culture, leads to the strengthening of the reputation and authority of KazNRTU and is the key to further successful development in the future.

3 NORMS OF CORPORATE ETHICS

3.1 Ethics of business conduct at KazNRTU

Creating and maintaining a comfortable working atmosphere in the team, employees and officials have to comply with the following rules and regulations:

- respect the honor and dignity of a person and a citizen regardless of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence or any other circumstances;
- Treat respectfully the state and other languages, traditions and customs of all nations;
- be polite and correct, and at the same time be intolerant to indifference and rudeness;
- be attentive to others’ opinions and always thank for the assistance, even if it is not fully provided;
- to ensure the unity of word and deed, to keep promises; not to hide, to admit his/her mistakes;
- not to engage in business that is not related to the performance of official duties during working hours;
- not to show colleagues a bad mood; not to use foul language, not to show incontinence and aggression;
- not to allow inappropriate behavior, incorrect statements in relation to other employees, officials and the University;
- to help colleagues, share knowledge and experience;
- not to discuss personal or professional qualities of colleagues in their absence;
- not to cause financial, property, image or other damage to the interests of both the University as a whole and its structural divisions, subsidiaries and individual employees of KazNRTU by their actions.
- it is mandatory to use corporate mail of the university; all other methods are complementary and optional.
- not to use office computers for purposes not intended for professional

activities.

– not to make changes in the modification of the computer without the official permission of the Department of Information Systems. The transfer of computers is carried out only with the permission of the materially *responsible person of the department*.

3.2 Ethics of outside-work behavior

Officials and employees of KazNRTU outside-work hours must:

- adhere to generally accepted moral and ethical standards, to prevent cases of antisocial behavior, including being in public places in a state of intoxication that offends human dignity and public morality;
- show modesty, not to use his/her official position;
- not to admit violations of the requirements of the legislation from your side, associated with an encroachment on public morality, order and safety, and not to involve other citizens in the commission of illegal, illegal and antisocial actions.

3.3 Ethics of the relationship between employees and representatives of the learning/student contingent

The relationship of employees with representatives of the student contingent is based on the principles of observance of subordination, interpersonal ethics, fairness and honesty:

- it is unacceptable to use any form of moral and physical pressure of workers on representatives of the student contingent;
- employees are obliged to provide assistance in matters arising from representatives of the student contingent in the field of its competence;
- any methods of humiliation and public condemnation of students (including academic performance) are prohibited. Rudeness, profanity, infringement of honor and dignity, causing moral or material damage to them, committing illegal actions, regardless of the status and affiliation of the person are not allowed;
- in the resolution of conflicts or controversial situations that have arisen among representatives of the student contingent, employees participate in the framework of this Code, guided by general ethical norms and documents protecting civil rights;
- in conflict situations between employees and representatives of the student contingent, the problem that has arisen is solved by independent representatives, taking into account the interests of both conflicting parties;
- message to the student of the results of control activities should be carried out in a confidential atmosphere;
- it is forbidden to attract students to other work which are not provided by the academic program;

- if teachers are late for class, they must apologize to the students. The absence of a teacher during classes is unacceptable;
- the teacher is obliged to treat all students equally - without preferences for any criteria;
- public positive feedback about students is encouraged.

3.4 Ethics in relationships with subsidiaries and dependent organizations

KazNRTU maintains relationships with subsidiaries and dependent organizations in accordance with the requirements of the legislation, the Charter and internal documents of KazNRTU, charters of subsidiaries and dependent organizations of KazNRTU, as well as the provisions of the Corporate Governance Code.

3.5 Ethics in relationships with business partners

KazNRTU interacts with business partners on the principles of mutual benefit, transparency and full responsibility for the obligations assumed in accordance with the terms of contracts / agreements and fulfills its obligations in relation to them.

In the case of disagreements and disputes, KazNRTU gives preference to negotiations and the search for a compromise, and also guarantees the timely and complete consideration of all requests, wishes and claims of partners.

In relations with business partners, KazNRTU adheres to fair and free competition and condemns all manifestations of unfair competition, which can not only negatively affect the reputation, but also undermine the trust of partners in KazNRTU.

3.6 Ethics in relationships with the public

KazNRTU is aware of its social responsibility to the public, and as an integral element of the public environment seeks to have a positive impact on the solution of socially significant issues:

- supports programs aimed at increasing the level of knowledge and education of the population, and other social programs within the framework of its authority;
- establishes *constructive relationships with organizations (public, non-governmental and others) in order to improve public relations, health protection and labor safety of KazNRTU employees.*

Social responsibility is carried out within the framework of the legislation of the Republic of Kazakhstan, the Charter and internal documents of KazNRTU.

3.7 Ethics in relationships within the staff of the department

- the spirit of collegiality, openness, tolerance to other opinions is welcomed. Such actions as personal negativism, condemnation “behind the back”, spreading rumors are considered completely incompatible with professional activity;
- it is strictly forbidden to raise a tone of anyone in relation to anyone, including students;
- any preferences on ethnic, gender, age, financial and political grounds are unacceptable;
- it is necessary to avoid political debates on controversial topics and political agitation in any form of any party on the territory of the department;
- avoid organizing meetings on Friday. Department staff have the right to visit the mosque during the working day;
- in case of postponing the working day to Sunday, the employee has the right to visit the synagogue and church during the working day.

4 ETHICS OF CORPORATE CULTURE

4.1 Ethics of negotiation and the appearance of Employees. Dress code

Employees during the performance of their duties is recommended:

- adhere to the norms of a business style in the choice of clothing and
 - footwear that support the respectable and professional image of KazNRTU;
 - have a neat appearance, use competent oral, written speech that does not
 - allow the use of vulgarisms and slang;
 - adhere to the rules of the culture of negotiation, including telephone.
- Business negotiations should be conducted in a calm, polite manner;
- be able to speak on the phone with colleagues and business partners in a manner that contributes to creating a favorable impression of KazNRTU as a whole. Also, when talking on the phone, it is necessary to remember that colleagues may be in the same room and you should take care of their work and not be distracted by a loud conversation;
 - in preparation of business letters, including e-mail and electronic document, the employee should adhere to the rules for writing business letters, which include accuracy, brevity, literacy and politeness in the presentation of information.

4.2 Corporate events

One of the significant elements in the formation of corporate culture is the holding of festive events in the team. Traditional corporate holidays include national, state, professional, religious and other holidays. Festive events are held

inside the University and outside it (going out of town, into nature). In some cases, on the initiative of the management, family members of KazNRTU employees are invited.

Corporate events include conferences, sports events, activities for active corporate recreation.

5 CONFIDENTIALITY

Confidential information of KazNRTU is information classified as such in accordance with the legislation of the Republic of Kazakhstan and internal documents of KazNRTU.

Any information of a confidential nature in the possession of employees, including the Officials, kept confidential, unless the legislation of the Republic of Kazakhstan is not expressly provided otherwise.

Employees who have access to confidential information of KazNRTU should not disclose it to other employees who do not have access to such information, as well as to any third parties. Such restrictions are also applied during the time established by the internal documents of KazNRTU, after the employee's dismissal.

During the working day and at the end of it, when the Employee leaves his/her workplace, he/she must make sure that there are no documents containing confidential information on his desktop or in another easily accessible place. All such documents must be locked with a key in cabinets or drawers, and the computer must be turned off or locked. During a conversation with partners at the Employee's desktop, all confidential information, including information on the computer screen, must be visually inaccessible to the interlocutor.

Confidential information (in electronic, written or other form) should not be taken out outside KazNRTU without a corresponding instruction from the management. Upon dismissal, the Employee is obliged to leave to KazNRTU all documents, files, computer floppy disks, reports and records containing information about KazNRTU or information that is not intended for a wide range of people, as well as all copies of documents containing this information.

6 CONFLICT OF INTERESTS

Officials and Employees of KazNRTU perform their professional functions in good faith and prudence in the interests of KazNRTU and the Sole Shareholder, avoiding conflicts.

Identification of a conflict of interest and its adequate regulation is an important condition for ensuring the protection of the interests of the Sole Shareholder.

Officials and Employees of KazNRTU and / or its affiliates in order to avoid conflicts of interest:

- must not use in their own interests or to derive personal benefit from
- the opportunities that are provided to them by the corporate resources of KazNRTU, management, employees of KazNRTU, his/her official position and / or information received by him/her as a result of the performance of official duties;
- must not directly participate in the consideration and decision-
- making on any relationship between KazNRTU and itself, any of its affiliates;
- must not take part in any activity that could potentially lead to a
- conflict of interest;
- are obliged to make every effort to ensure that conflicts that arise are
- resolved within the framework of the current legislation, taking into account the legitimate interests of the parties involved in the conflict;
- must not accept any gifts or use the benefits associated with his/her activities in KazNRTU from any other third parties, as well as receive any income or benefits as a reward for performing functional duties. KazNRTU does not allow accepting gifts or receiving benefits, with the exception of symbolic tokens and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality, as well as during protocol and other official events.

The settlement of conflicts of interest in KazNRTU is regulated by this Code and other internal documents of KazNRTU.

7 DISCIPLINARY COMMISSION

The disciplinary commission of KazNRTU is a consultative-advisory board that considers issues of strengthening labor and academic discipline, implementation of the Law of the Republic of Kazakhstan “On Combating Corruption” and labor legislation by Employees and students of the University.

The main functions of the Disciplinary Commissions are to review information on non-compliance with anti-corruption and labor legislation, the internal regulations of KazNRTU, including the Code of Corporate Ethics.

The disciplinary commission has the right to:

- initiate procedures to identify violations of the provisions of the Code
- both on the basis of received applications and on their own initiative;
- apply personally to Employees, Officials on issues of non-observance of the Code.

Disciplinary Commission:

- participates in the consideration of issues related to non-compliance with

the Code;

– observes independence and impartiality when considering disputes on issues of non-compliance with the Code;

– ensures the anonymity of the Employee, the Official who applied on the fact of violation of the provisions of the Code (in case wishes to remain anonymous).

8 RESPONSIBILITY

All employees of KazNRTU regardless of position and status must take management decisions in accordance with the requirements of the Code of Conduct is mandatory.

Every official and employee is responsible for maintaining ethical standards in their conduct. Compliance with the norms of this Code is mandatory for all officials and employees of KazNRTU. Violation of the norms of this Code entails disciplinary liability in accordance with the established procedure.

All facts of violation of ethical norms in accordance with this Code should be considered in accordance with the norms of the legislation of the Republic of Kazakhstan and the internal acts of the University.

List of change registration

Sequential number of amendment	Section, paragraph of the document	Type of amendment (amend, cancel, add)	Notification number and date	Amendment made	
				Date	Surname and initials, signature, position