

Sustainable and ethical purchasing POLICY

The University recognizes that purchasing decisions have social and economic impacts on the environment and recognizes its responsibility to procure goods and services in a responsible manner.

This policy is in line with the commitments set out in the Satbayev University Sustainability Strategy and the associated Sustainability Policy Statement to fully integrate environmental and social responsibility into all areas of the University's operations.

In addition to complying with all relevant environmental, social and economic legislation, the University will strive to reduce the adverse impacts of its procurement activities by:

Incorporate lifetime cost and product impact into purchasing decisions:

- Encouraging the purchase of products made from sustainable, renewable or recycled resources, as well as products that require minimal transportation.
- See also Appendix 2 - Life Cycle Impact Assessment - Goods.
- Priority in purchasing products that meet Fairtrade regulations at the university and work towards achieving/maintaining Fairtrade university status.
- Encouraging the purchase of goods with minimal packaging. If unavoidable, packaging should be made from recycled or recyclable materials.
- Encouraging the purchase of products that have minimal environmental impact when used (e.g. durable, energy efficient, reusable).
- Ensure prudent use of resources in the procurement process, including the use of building and maintenance materials; utilities, paper, metal and wood where possible.
- Encouraging the purchase of products that can be recycled or disposed of with minimal impact on the environment.
- Exclusion of environmentally damaging products when there is a viable alternative.
- Development of individual policies and guidelines for products with significant environmental, social and economic impacts.

Assessment of environmental performance of suppliers and contractors:

Ensuring that suppliers and contractors are aware of the University's Sustainable Procurement Policy and that they themselves have appropriate policies in place to manage their environmental, social and economic impacts.

- Ensuring that environmental, social and economic criteria are considered when awarding contracts.
- Assessment of environmental, social and economic performance of suppliers and contractors.
- Working with suppliers and contractors to encourage improvements in their environmental, social, economic and ethical performance.

Raising awareness among employees:

- Encouragement of domestic buyers to rethink their consumption of goods in order to buy them less and less.
- Provide training to procurement staff on the implications of this policy.

This policy statement is available to all parties, including the public, and will be reviewed annually.

This document is available in an alternative format upon request.

Supply chain sustainability

Satbayev University is committed to promoting a sustainable procurement program (please see Appendix 1 for a common definition of sustainable procurement) delivering the greatest value to the institution while striving to implement and implement advanced sustainable procurement. The university should strive to have a positive impact on supply chain sustainability by penetrating its supply chain as much as possible.

Goals

When conducting tenders on behalf of the University, the Procurement Department shall strive to ensure that issues relating to social responsibility, ethical, economic and environmental impacts are addressed at an acceptable or better level, and shall:

- Ensure that its agreements remain fully compatible with the RoK, but emphasize environmental considerations where practicable and legal.
- Establish actionable minimum standards for supplier sustainability compliance.
- Develop a full understanding of the level of sustainability of the supply chain within its supply base.
- Promote compliance with the 10 principles of the United Nations (UN) Global Compact (Appendix 1).
- Support the RoK government's Sustainable Procurement Action Plan and help institutions make incremental changes to the RoK's flexible sustainable procurement system (Appendix 3).
- Manage bidding and lottery strategies that provide fair access to contracting opportunities for businesses of all relevant sizes and types of organizations, where applicable.
- Reduce supply chain sustainability risks and seize opportunities
- Develop and disseminate a Code of Conduct (Appendix 4).
- Promote continuous improvement in sustainable procurement

Tasks

This policy assumes that we will go beyond the usual definition of sustainable procurement and will procure goods and services in a manner that minimizes any negative environmental, ethical, economic or social impact and promotes positive impacts and change throughout the process. life cycle and supply chain of goods or services to meet current needs without diminishing the ability of future generations to do the same.

Within the framework of tenders conducted by Satbayev University, the impact on sustainability may cover (but not be limited to):

- ***Social impact:*** labor standards, human rights, child labor, forced labor, discrimination, equity, health and safety, free education.

- ***Environmental impact:*** carbon emissions, carbon management, waste management, water management, pollution, technological improvements.
- ***Ethical and economic implications:*** fraud, trade problems, conflict, violence, terrorism, corruption, poverty and low wages, bribery.

Appendix 1

1. Definition of "sustainable procurement"

The Marrakesh Working Group of the United Nations defines sustainable procurement as follows: *“Sustainable procurement is the process by which organizations meet their needs for goods, services, works and utilities in a way that provides value for money over a lifetime of benefits. not only for the organization, but also for society and the economy, minimizing damage to the environment.”*

2. 10 principles of the UN Global Compact

The UN Global Compact calls on companies to adopt, support and enforce a set of core human rights, labor standards, environment and anti-corruption values within their sphere of influence:

Human rights

- Principle 1: Businesses must support and respect the protection of internationally proclaimed human rights; And
- Principle 2: Make sure they are not complicit in human rights violations.

Work

- Principle 3: Businesses should support freedom of association and effective recognition of the right to collective bargaining;
- Principle 4: elimination of all forms of forced and compulsory labor;
- Principle 5: effective elimination of child labour; And
- Principle 6: Elimination of discrimination in relation to work and occupation.

Area

- Principle 7: Businesses should support a prudent approach to environmental issues;
- Principle 8: take initiatives to increase environmental responsibility; And
- Principle 9: Encourage the development and dissemination of environmentally sound technologies.

Fight against corruption

- Principle 10: Businesses must fight corruption in all its forms, including extortion and bribery.

Supply Chain Sustainability and Code of Conduct

The goal is to have a key supplier base that has been fully assessed for compliance with our Code of Conduct (CO), allowing the University to identify areas of risk that need to be managed. The benefits of implementing this policy are many and varied, including:

- Supply chain risk reduction
- Promoting supply chain best practices
- Enhanced Supplier Capabilities and Compliance
- Helps to achieve corporate goals and legal requirements
- Support the goals of public responsible procurement
- Awareness and training for suppliers

The Code of Business Ethics will be included in the annex to all tenders held by Satbayev University. As part of this, questions should be included in Appendix 4, and suppliers should be required to subscribe to the CP or not (and give reasons if they do not).

Appendix 2: Life Cycle Impact Assessment – Goods

Impact of obtaining raw materials <ul style="list-style-type: none"> • mining (including conflict minerals) • water use • working conditions 	Production/Delivery Impact <ul style="list-style-type: none"> • fuel emissions • package • working conditions
Consequences of using the goods <ul style="list-style-type: none"> • energy use 	Impact of product end-of-life <ul style="list-style-type: none"> • product disposal

Appendix 3: Flexible sustainable procurement system

	Basic level 1	Embed Level 2	Practice Level 3	Upgrade level 4	Master Level 5
People	Sustainable Procurement Champion Decided. Key procurement staff received basic training on sustainable procurement principles. Sustainable procurement is included in the key personnel induction program.	All procurement staff have received basic training on sustainable procurement principles. Key employees received in-depth training on sustainable procurement principles.	Targeted training on the latest principles of sustainable procurement. Performance goals and evaluation include sustainable procurement factors. There is a simple motivational program.	Sustainable procurement is included in competencies and selection criteria. Sustainable procurement is included in the employee training program.	Achievements are published and used to attract procurement professionals. Achievements are rewarded internally and externally. The emphasis is on the benefits achieved. Sharing best practices with other organizations.
Policy, strategy and Communications	Agree on overarching sustainable development goals. A simple sustainable purchasing policy endorsed by the CEO. Communication with staff and key suppliers.	Revise and improve the sustainable procurement policy, in particular, consider the issue of attracting suppliers. Make sure it's part of a broader sustainability strategy. Communication with staff, suppliers and key stakeholders.	Transform your sustainable purchasing policy into a strategy that spans risk, process integration, marketing, supplier engagement, and the verification process. The strategy has been approved by the CEO.	Review and improve the sustainable procurement strategy, in particular recognizing the potential of new technologies. Try to link the strategy to the EMS and incorporate it into the overall corporate strategy.	Strategy: regularly reviewed, externally reviewed and linked directly to the organization's EMS. The sustainable procurement strategy, recognized by political leaders, is being widely disseminated. A detailed review is undertaken to determine future priorities, after which a

					new strategy is developed that goes beyond these frameworks.
Purchasing process	A cost analysis has been carried out and the main impacts on sustainability have been identified. Key contracts are starting to include general sustainability criteria. Contracts are awarded on the basis of value for money, not the lowest price. Buyers implement their own approaches.	A detailed cost analysis was carried out, key sustainability risks were assessed and used to set priorities. Sustainability is considered early in the procurement process for most contracts. Lifetime cost analysis adopted.	All contracts are assessed for overall sustainability risks and management measures are determined. Risk management at all stages of the procurement process. Sustainability targets are being agreed with key vendors.	Detailed sustainability risk assessment for high performance contracts. Implemented project/contract sustainability management. A life cycle approach to cost/impact assessment is applied.	Life cycle analyzes were carried out for key areas of commodities. Sustainability key performance indicators are agreed with key suppliers. Progress is rewarded or punished based on results. Barriers to sustainable procurement have been removed. Sharing best practices with other organizations.
Attracting suppliers	An analysis of the costs of key suppliers was carried out and suppliers with a high level of sustainable development were identified. Key suppliers are targeted for engagement and views on procurement policy are requested.	Conducted a detailed analysis of the costs of suppliers. A general supplier engagement program has been initiated with the involvement of senior management.	A targeted supplier engagement program is in place to continuously improve sustainability. Two-way communication between the purchaser and the supplier exists with incentives. Supply chains for key spending areas have been mapped.	Key suppliers are focused on intensive development. Implemented sustainability audits and supply chain improvement programs. Achievements are officially recorded. The CEO participates in a vendor engagement program.	Suppliers are recognized as important to the implementation of an organization's sustainable procurement strategy. The CEO interacts with suppliers. Sharing best practices with other/peer organizations. Suppliers recognize that they must continuously improve their sustainability profile in order to support the customer's business.
Measurements and results	Key impacts of procurement on sustainability identified.	A detailed assessment of the impact of procurement activities on sustainability was carried out. Measures have	Sustainability measures refined from general departmental measures to include individual	The metrics are integrated into a balanced scorecard approach that reflects both inputs and outputs.	Measures used to drive the direction of an organization's sustainability strategy. Progress is officially

		been implemented to manage the identified high-risk impact areas.	buyers and linked to development goals.	Comparison is made with similar organizations. Benefits reports have been produced.	compared with similar organizations. The benefits of sustainable procurement are clear. Independent audit reports are publicly available.
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Appendix 4: Code of Conduct for the Supply Chain

Satbayev University is committed to conducting procurement activities in an environmentally, socially, ethically and economically responsible manner, as well as entering into agreements and contracts with suppliers who share and adhere to its vision. The standards of this Code are based on established global conventions and standards, including the UN SDGs, the ETI Core Code and ILO conventions.

To demonstrate this commitment, current and potential suppliers are asked to confirm their adherence to the principles of the Supply Chain Code of Conduct below in relation to their organization and their supply chain (reference to "Suppliers" in this code means suppliers and their supply chains).

With respect to social compliance, Suppliers must:

1. Do not use forced, involuntary labor or the labor of minors.
 - 1.1 Employees should be free to choose their place of work and leave their job without bail or personal belongings.
 - 1.2 Forced, bonded or involuntary labor of prisoners shall not be used.
 - 1.3 Never engage in human trafficking or support or work with organizations that in any way engage in human trafficking, organizations or individuals.
 - 1.4 Ensure that employment fees, if applicable, are always paid by the employer alone.
 - 1.5 Actively exceed the requirements of any anti-slavery/modern-slavery legislation in any country in which they operate and comply with any voluntary and mandatory posting schemes in place to ensure the transparency of this activity.
 - 1.6 Support the effective elimination of child labour.
 - 1.7 Respect the national minimum age for employment or a minimum age of 15, whichever is higher, except where a lower local minimum age is permitted under *International Labor Organization (ILO) Convention 138*.
 - 1.8 If any child is found to be engaged in or performing child labour, provide support to that child so that, at a minimum, they can complete their compulsory education (even if they no longer engage in child labour) or the equivalent level of education provided for by the UN Economic Covenant. , social and cultural rights. Such provider support must be recognized and not prejudicial to the conditions of the child or those supported by their work.

2. Provide suitable working conditions and terms / Health and safety

General

2.1 At the very least, the statutory minimum wage (or, if there is none, a realistic living wage) must be paid without discrimination to all employees, and all non-statutory contributions must be made with the consent of the employee.

2.2 Working hours should not be excessive (no more than 48 hours per week, excluding overtime) and should include an average of at least 1 day off for every 7 days. Work beyond this should be irregular and carried out at the discretion of the employees.

2.3 A safe and hygienic working environment, including eating and living areas, must be provided. Any hazardous work, as defined by the ILO, should only be performed by persons aged 18 or over.

2.4 Provide a safe and hygienic work environment, including all food service areas, restrooms and living quarters. Any hazardous work, as defined by the ILO, should only be performed by persons aged 18 or over.

2.5 Ensure that all equipment is safe to use and processes must provide a safe working environment. Workers must receive training (which must be mandatory and in a language they understand) in the safe operation of all equipment and tools. Training should take place as often as required to remain effective.

2.6 Make every possible effort to eliminate (in the first place) and reduce the threat to the health of workers from all hazards, including any hazardous chemicals used in production activities and / or in the supply chain, and conduct mandatory training (in a language the worker understands) in a safe using any harmful chemicals.

2.7 Provide all personal protective equipment necessary to ensure the health and safety of workers.

2.8 All equipment must be safe to use and processes must provide a safe working environment.

2.9 Policies and processes should be in place to record and address the occurrence/recurrence of health and safety incidents.

3. Rights and behavior of workers

3.1 Allow workers freedom of association to join (but not be forced to join) or be represented by a trade union or similar organization of their choice, and freely leave such organizations. Worker representatives should be elected by the respective workers and not appointed by management.

3.2 Not discriminate or unfairly treat any worker for any reason, including education, social class/caste, nationality, union membership, age, disability, gender reassignment, marriage and civil partnership, pregnancy and motherhood, race, culture, religion or beliefs, gender or sexual orientation.

3.3 Adhere to the University's Statement of Equality (Appendix 6) and the Inclusion in Equity and Diversity Policy to ensure that staff (including other contractors), students and visitors on University property are treated fairly.

3.4 Provide a work environment free of discrimination, harassment or victimization.

3.5 Treat all employees with respect and dignity and do not accept inequality as culturally justifiable.

3.6 Compensate equally all employees with the same level of employment, regardless of any of the characteristics listed above, unless otherwise provided by legal conditions.

3.7 Ensure that effective employee engagement practices are in place to the extent that all employees are relieved of their duties and their labor rights in accordance with local and international laws.

3.8 Ensure that all vendor representatives, when on or near the facility, and when interacting with any employee, student or member of the public, behave in a respectful and courteous manner consistent with the institution's equity, diversity and inclusion principles. standards.

4. With respect to ethical compliance and economic development, Suppliers shall:

4.1 At a minimum, comply with all laws and regulations of the countries in which they operate, manufacture or trade, as applicable.

4.2 Not engage in any way in acts of corruption or bribery, nor support acts of conflict, violence or terrorism or mistreatment of individuals or communities.

4.3 Not impose unsustainable or unfair contract terms on your suppliers or throughout the supply chain, or take advantage of a dominant market position or customer in bad faith.

4.4 Maintain fair trade conditions for producers, where applicable.

4.5 At a minimum, comply with all financial regulations and taxes of the countries in which they operate, manufacture or trade, as the case may be.

4.6 Include the provision of public goods in the area where the contract is being implemented (including publishing and providing local levels of training and employment opportunities, etc.).

4.7 Appoint subcontractors through an open and fair process, such as a public announcement of such opportunities when possible.

4.8 Always act with respect and integrity, including open and transparent records.

4.9 Protect employees if they report misconduct or raise concerns about their own or another organization, and ensure that all affected employees are treated fairly and transparently.

5. With respect to environmental compliance, Suppliers shall:

5.1 At a minimum, comply with all local and national environmental laws, regulations and directives of the countries in which they operate, manufacture or trade, as applicable.

5.2 Actively avoid causing environmental damage and/or negative impacts on the environment through the production and supply of goods or services and disposal of supply chain waste.

5.3 Have and act on a business plan to minimize their environmental impact from year to year and adopt or work towards achieving internationally recognized environmental standards and/or behaviour.

5.4 Encourage the development and use of environmentally sound technologies.

5.5 Promote positive environmental impacts (eg, carbon reduction, better carbon management, waste and water management, pollution reduction and technological improvements) through our activities where possible.

Global climate and environmental emergency

5.6 Institutions of Higher Education and Further Education are increasingly setting themselves ambitious targets covering all three areas of the Greenhouse Gas Protocol. Satbayev University is committed to achieving carbon neutrality and requires its suppliers to support this goal. The Supplier shall support the sectors' objectives to reduce the climate impact of their supply chains, including having clear and verifiable plans and actions, where reasonable and proportionate to the nature of the goods and services provided.

5.7 In addition to confirming compliance with the foregoing, each potential supplier of goods and services to the University is invited to provide answers to the following questions and criteria. It will also allow the University to gain and understand how effectively the supplier is addressing environmental and sustainability issues.

I, the undersigned, acting as a representative of the Company, hereby certify that the Company adheres to the Satbayev University Code of Conduct and undertakes to enforce the Code of Conduct throughout my supply chain to ensure and promote sound social, ethical, environmental and economic practices.

**Governing Board member – Vice-Rector
for Science and Corporate Development**



Ye. Kuldeyev
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