

 SATBAYEV UNIVERSITY	NON-PROFIT JOINT-STOCK COMPANY "KAZAKH NATIONAL RESEARCH TECHNICAL UNIVERSITY named after K.I. SATBAYEV"	
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APPROVED
 by the Decision of the Board of Directors
 of the Non-Profit Joint-Stock Company
 “Kazakh National Research Technical University
 named after K.I. Satbayev”
 dated 14 April 2022, No. 3



CODE
of Corporate Ethics of Employees of KazNRTU
C029-02-03.3.01–2022

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PREAMBLE

1 DEVELOPED by the Corporate Development Department of the Non-Profit Joint-Stock Company K. I. Satbayev Kazakh National Research Technical University.

2 AGREED with the structural subdivisions of the Non-Profit Joint-Stock Company K. I. Satbayev Kazakh National Research Technical University.

3 APPROVED by Resolution No. 3 of the Board of Directors of the Non-Profit Joint-Stock Company K. I. Satbayev Kazakh National Research Technical University dated April 14, 2022.

4 ENACTED to replace Revision No. 3.

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MISSION OF THE CODE

The Corporate Ethics Code of the Non-Profit Joint-Stock Company K. I. Satbayev Kazakh National Research Technical University* is a managerial instrument necessary for effective interaction with stakeholders, as well as a key mechanism that promotes a uniform understanding of the standards of business ethics and conduct that influence the day-to-day activities of employees and the University as a whole.

VISION

The Corporate Ethics Code is a fundamental instrument for shaping corporate culture, which contributes to improving the effectiveness of the corporate governance process and facilitates successful interaction between the University and its stakeholders.

1 GENERAL PROVISIONS

This Corporate Code of Ethics has been developed in accordance with the provisions of the current legislation of the Republic of Kazakhstan and the internal documents of Satbayev University, including the Corporate Governance Code of the Non-Profit Joint-Stock Company in the field of higher and postgraduate education, and establishes the fundamental values and principles of corporate ethics as well as the standards of business relations.

The purpose of this Code is to develop a culture of quality for effective interaction with stakeholders through the application of ethical business practices and to foster a unified corporate culture based on high ethical standards, both in making strategically important decisions and in day-to-day activities.

Satbayev University expects every official and employee to adhere to the following fundamental corporate values:

- competence and professionalism in the performance of job duties;
- reliability and impartiality in actions and decisions;
- efficiency and effectiveness in enhancing professional skills, with a focus on the RoadMap – the development strategy of Satbayev University;
- social responsibility for the activities of Satbayev University, aimed at maintaining and enhancing its business reputation and positive image within the professional community;
- trust-based relationships and high cultural and moral standards to promote an atmosphere of trust and fairness at Satbayev University;
- readiness for change in line with modern requirements, as well as an orientation toward dynamism and a creative approach to performing tasks and official duties;
- integrity and respect toward employees, stakeholders, and Satbayev

University as a whole..

In carrying out its activities, Satbayev University:

- complies with the legislation of the Republic of Kazakhstan, decisions of the shareholder and state authorities, and other documents related to the activities of Satbayev University;
- ensures the observance and respect of human rights;
- acts fairly and in good faith, demonstrating zero tolerance for corruption;
- treats officials and employees fairly and with respect, in compliance with ethical standards;
- strives to ensure that all relationships with stakeholders are mutually beneficial;
- demonstrates respect for and careful treatment of the environment;
- focuses its professional activities on results expressed in the high quality of professional training, scientific output, and the promotion of a high level of intellectual culture in society.

This Code is applied in conjunction with other internal documents and governs the activities of officials and employees of Satbayev University.

2 TERMS AND DEFINITIONS

For the purposes of this Code, the following terms and definitions shall apply:

- 1) **KazNRTU** – the Non-Profit Joint-Stock Company K. I. Satbayev Kazakh National Research Technical University;
- 2) **Business Ethics** - a set of ethical principles and norms of business conduct that guide KazNRTU, its officials, and employees in their activities;
- 3) **Officials** - members of the Board of Directors and members of the Management Board of KazNRTU;
- 4) **Stakeholder** - a person whose exercise of rights provided for by legislation and the Charter is related to the activities of the University;
- 5) **Code** - the Corporate Ethics Code;
- 6) **Conflict of Interest** - a situation in which an employee's personal interest influences or may influence the impartial performance of official duties;
- 7) **Corporate Culture** - the values, principles, standards of conduct, and relationships specific to the University;
- 8) **Employee** - an individual who is in an employment relationship with KazNRTU and directly performs work under an employment contract;
- 9) **Disciplinary Commission** — a consultative and advisory body that reviews issues related to strengthening labor and academic discipline, compliance with the Law of the Republic of Kazakhstan “On Combating Corruption”, and observance of labor legislation by employees and students of KazNRTU.

The University adopts and adheres to the provisions of this Code in its relations with officials, employees, and stakeholders when making business

decisions, both strategically significant and those arising in everyday situations faced by officials and employees.

The University adopts and adheres to the provisions of this Code in its relations with officials, employees, and stakeholders when making business decisions, both strategically significant and those arising in everyday situations faced by officials and employees.

3 CORPORATE ETHICS STANDARDS

3.1 Ethics of Business Conduct at KazNRTU

In creating and maintaining a comfortable working environment within the team, Employees and Officials shall comply with the following standards and rules:

- respect the honor and dignity of individuals and citizens regardless of origin, social, official, or property status, gender, race, nationality, language, religion, beliefs, place of residence, or any other circumstances;
 - demonstrate respect for the state language and other languages, as well as for the traditions and customs of all peoples;
 - be polite and courteous, while showing zero tolerance for indifference and rudeness;
 - be attentive to others' opinions and always express gratitude for assistance, even if such assistance is provided only partially;
 - ensure consistency between words and actions, fulfill commitments, and acknowledge rather than conceal mistakes;
 - refrain during working hours from engaging in activities unrelated to the performance of official duties;
 - not display a bad mood to colleagues; refrain from the use of offensive language, and avoid manifestations of restraint loss or aggression;
 - prevent inappropriate behavior and improper statements with respect to other Employees, Officials, and the University;
 - assist colleagues and share knowledge and experience;
 - refrain from discussing the personal or professional qualities of colleagues in their absence;
 - avoid actions or inaction that may cause financial, property, reputational, or other damage to the interests of the University as a whole, its structural subdivisions, subsidiary organizations, or individual employees of KazNRTU;
 - use the University's corporate email system on a mandatory basis; all other means of communication are supplementary and optional;
 - not use office computers for purposes unrelated to professional activities;
 - not make changes to computer configurations without official authorization from the structural subdivision responsible for information systems.
- The relocation of computers shall be carried out only with the permission of the materially responsible person of the department.

3.2 Ethics of Conduct outside Working Hours

Outside working hours, the officials and employees of KazNRTU shall:

- adhere to generally accepted moral and ethical standards and refrain from antisocial behavior, including being in public places in a state of intoxication that offends human dignity and public morality;
- demonstrate modesty and refrain from using their official position for personal purposes;
- avoid any violations of legislative requirements involving encroachments on public morality, order, and safety, and refrain from involving other individuals in unlawful, illegal, or antisocial actions.

3.3 Ethics of Relationships between Employees and Members of the Student Body

Relationships between Employees and members of the student body shall be based on the principles of subordination, interpersonal ethics, fairness, and honesty:

- any form of moral or physical pressure exerted by employees on members of the student body is unacceptable;
- employees shall provide assistance on issues arising within their area of competence to members of the student body;
- any methods of degrading dignity or public condemnation of students (including academic performance) are prohibited. Rudeness, profanity, infringement of honor and dignity, causing moral or material harm, or committing unlawful acts are not permitted, regardless of the individual's status or affiliation;
- in resolving conflict or disputable situations among members of the student body, employees shall act within the framework of this Code, guided by generally accepted ethical norms and documents protecting civil rights;
- in the event of conflict situations between employees and members of the student body, the issue shall be resolved by independent representatives, taking into account the interests of both conflicting parties;
- communication of the results of assessments and control activities to students shall be carried out in a confidential setting;
- engaging students in activities not envisaged by the academic program is prohibited;
- in the event of a lecturer's late arrival to a class, an apology to students is required. Absence of a lecturer during scheduled classes is unacceptable;
- lecturers shall treat all students equally, without preferences based on any criteria;
- public positive feedback regarding students is encouraged.

3.4 Ethics of Relations with Subsidiary and Affiliated Organizations

KazNRTU conducts relations with its subsidiary and affiliated organizations in accordance with the requirements of the legislation, the Charter and internal documents of KazNRTU, the charters of its subsidiary and affiliated organizations, as well as the provisions of the Corporate Governance Code.

3.5 Ethics of Relations with Business Partners

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

In the event of disagreements or disputes, KazNRTU gives preference to negotiations and the search for compromise, and also guarantees the timely and comprehensive consideration of all appeals, proposals, and claims of partners.

In its relations with business partners, KazNRTU adheres to the principles of fair and free competition and condemns all manifestations of unfair competition that may not only adversely affect its reputation but also undermine partners' trust in KazNRTU.

3.6 Ethics of Relations with the Public

KazNRTU recognizes its social responsibility to the public and, as an integral part of society, strives to exert a positive impact on the resolution of socially significant issues by:

- supporting programs aimed at improving the level of knowledge and education of the population, as well as other social programs within the scope of its authority;
- establishing constructive relations with organizations (public, non-governmental and other organizations) for the purpose of improving social relations, protecting health, and ensuring occupational safety for KazNRTU Employees.

Social responsibility is exercised in accordance with the legislation of the Republic of Kazakhstan, the Charter, and the internal documents of KazNRTU.

3.7 Ethics of Relations within a Structural Subdivision Team:

A spirit of collegiality, openness, and tolerance for differing opinions is encouraged. Actions such as personal negativity, “behind-the-back” criticism, and the spread of rumors are considered completely incompatible with professional activity;

- Any form of raised voice by anyone toward anyone else, including students, is strictly prohibited;
- Any preferences or discrimination based on ethnicity, gender, age, financial status, or political views are unacceptable;
- Political debates on controversial issues and political campaigning in any form by any party on the University premises shall be avoided;
- The organization of meetings on Fridays should be avoided. Employees of a structural subdivision have the right to visit a mosque during working hours;
- In the event that a working day is rescheduled to Sunday, an employee has the right to visit places of religious worship (synagogue, church) during working hours.

4 CORPORATE CULTURE ETHICS

4.1 Ethics of Conducting Negotiations and Employees' Appearance. Dress Code

- adhere to business style standards when choosing clothing and footwear that support a respectable and professional image of KazNITU;
- maintain a neat and tidy appearance, use proper oral and written language, and avoid vulgarisms and slang;
- comply with the rules of negotiation culture, including telephone communication. Business negotiations shall be conducted in a calm and polite manner;
- communicate by telephone with colleagues and business partners in a way that contributes to forming a favorable impression of KazNITU as a whole. During telephone conversations, Employees should also bear in mind that colleagues may be present in the same room and should respect their work by avoiding loud conversations;
- when preparing business correspondence, including emails and documents within electronic document management systems, adhere to the rules of business writing, including accuracy, conciseness, correctness, and politeness in presenting information.

4.2 Corporate Events

One of the important elements in shaping corporate culture is the organization of celebratory events within the team. Traditional corporate holidays include national, state, professional, religious, and other holidays. Celebratory events may be held both on the University's premises and outside it (such as trips out of town or outdoor activities). In certain cases, at the initiative of management, family members of KazNRTU Employees may be invited.

Corporate events include conferences, sports events, and activities aimed at active corporate recreation.

5 CONFIDENTIALITY

Information recognized as confidential by KazNRTU shall be information classified as such in accordance with the legislation of the Republic of Kazakhstan and the internal documents of KazNRTU.

Any confidential information possessed by Employees, including Officials, shall be kept confidential unless otherwise expressly provided by the legislation of the Republic of Kazakhstan.

Employees who have access to confidential information of KazNRTU shall not disclose such information to other employees who do not have access thereto, or to any third parties. These restrictions shall also apply for the period established by the internal documents of KazNRTU after termination of employment.

During the working day and upon its completion, when an Employee leaves the workplace, the Employee shall ensure that no documents containing

confidential information remain on the desk or in any other easily accessible place. All such documents shall be locked in cabinets or drawers, and the computer shall be switched off or locked. During conversations with partners at the Employee's desk, all confidential information, including information displayed on the computer screen, shall be visually inaccessible to the interlocutor.

Confidential information (in electronic, written, or any other form) shall not be removed from the premises of KazNRTU without appropriate authorization from management. Upon termination of employment, the Employee shall leave with KazNRTU all documents, files, computer media, reports, and records containing information about KazNRTU or information not intended for public disclosure, as well as all copies of documents containing such information.

6 CONFLICT OF INTERESTS

Officials and Employees of KazNRTU shall perform their professional duties diligently and prudently in the interests of KazNRTU and the Sole Shareholder, avoiding conflicts of interest.

A conflict of interests is defined as a situation in which the personal interest of an employee influences or may influence the impartial performance of official duties.

In order to prevent conflicts of interest that hinder the objective performance of duties by the Board of Directors and to limit political interference in the activities of the Company's Board of Directors, the Company implements mechanisms for the prevention and regulation of such conflicts.

The identification of conflicts of interest and their proper regulation is an essential condition for ensuring the protection of the interests of the Sole Shareholder.

Officials and Employees of KazNRTU and/or their affiliated persons, for the purpose of preventing conflicts of interest:

- shall not use, for personal interests or personal gain, opportunities provided by the corporate resources of KazNRTU, its management, employees, official position, and/or information obtained in the course of performing official duties;
- shall not directly participate in the consideration and adoption of decisions regarding any relations between KazNRTU and themselves or any of their affiliated persons;
- shall not engage in any activities that may potentially lead to a conflict of interest;
- shall make every effort to ensure that arising conflicts are resolved within the framework of the current legislation, taking into account the lawful interests of all parties involved in the conflict;
- shall not accept any gifts or use benefits related to their activities at KazNRTU from any third parties, nor receive any income or benefits as remuneration for the performance of functional duties. KazNRTU does not permit

the acceptance of gifts or benefits, except for symbolic tokens of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality, as well as during protocol and other official events.

The regulation of conflicts of interest at KazNRTU is governed by this Code and other internal documents of KazNRTU.

7 DISCIPLINARY COMMISSION

The Disciplinary Commission of KazNRTU is a consultative and advisory body that considers issues related to strengthening labor and academic discipline, compliance with the Law of the Republic of Kazakhstan “On Combating Corruption”, and labor legislation by Employees and students of the University.

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

The Disciplinary Commission is entitled to:

- initiate procedures to identify violations of the provisions of the Code, both on the basis of received appeals and on its own initiative;
- directly contact Employees and Officials on issues related to non-compliance with the Code.
- The Disciplinary Commission:
 - participates in the consideration of cases related to non-compliance with the Code;
 - ensures independence and impartiality when reviewing disputes related to non-compliance with the Code;
 - ensures the anonymity of an Employee or Official who reports a violation of the provisions of the Code (if they wish to remain anonymous).

8 RESPONSIBILITY

All employees of KazNRTU, regardless of their position and status, shall make managerial decisions in strict compliance with the requirements of the Corporate Ethics Code.

Each official and employee is personally responsible for observing ethical standards within the scope of their conduct. Compliance with the provisions of this Code is mandatory for all officials and employees of KazNRTU. Violation of the provisions of this Code entails disciplinary liability in accordance with the established procedure.

All cases of violations of ethical standards under this Code shall be reviewed in accordance with the legislation of the Republic of Kazakhstan and the internal regulations of the University.

Change registration sheet _____
document designation

Serial number changes	Section, paragraph document	Type of change (replace, cancel, add)	Number and date notices	Change made	
				Date	Last name and initials, signature, position