

Code Of Corporate Ethics

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1. Definitions and abbreviations

The following abbreviations, terms and definitions are used in this Code of Corporate Ethics;

University - Educational Institution "Almaty Management University";

AlmaU - Educational Institution "Almaty Management University"

The Code is the present Code of Corporate Ethics of the University. The Code defines the basic norms and rules of individual and collective behavior of all University Employees without exception;

EC - Employment contract;

Employer - the University with which the Employee has an employment relationship;

Employee - an individual who is in an employment relationship with the employer and directly performs work under an employment contract;

TS - teaching staff;

AMP - administrative and managerial personnel - all University Employees with the exception of teaching staff;

Ethics is a set of norms of behavior;

Corporate ethics is a set of ethical principles and norms of business communication that guide all University employees in their activities;

Corporate culture is a set of norms, rules, values, ethical standards embodied in various aspects of the University's activities, and which make it unique;

Conflict of interests is a situation in which the Employee's personal interest affects or may affect the impartial performance of official duties;

The Ombudsman is a person appointed by the Board of Trustees of the University (possibly from among the employees) who promotes the implementation and compliance with the principles of corporate ethics at the University.

2. Purpose and scope of use.

2.1. The Code of Corporate Ethics (hereinafter referred to as the Code) is an act of the Educational Institution “Almaty Management University” (hereinafter referred to as the University) and defines the basic norms and rules of individual and collective behavior of all Employees without exception, including the teaching staff (hereinafter referred to as TS).

2.2. This Code is being introduced with the aim of strengthening and developing the corporate culture of the University, increasing the level of motivation of Employees to consciously support the strategy, image, authority, and best traditions inherent in the University, aimed at increasing the prestige of the University in the national and global educational space.

2.3. This Code has been developed in accordance with the legislation of the Republic of Kazakhstan, acts and the Charter of the University.

2.4. This Code is a set of principles, norms and rules of internal corporate behavior, social responsibility and other issues of business ethics adopted for University Employees.

2.5. The provisions of the Code must be understandable and clear to all its Employees, however, the Code cannot provide comprehensive regulation of all issues relating to the ethics of corporate behavior that may arise at the University. If any issue is not regulated by the Code, as well as in the event of controversial situations when the Employee has questions or doubts regarding the correctness of his actions, the actions of his colleagues or the correct understanding of the provisions of this Code, he should contact his immediate supervisor, or Commission on Corporate Ethics.

2.6. The goals of the Code are to create a sustainable corporate culture and system of corporate values, confirmation of the University’s continued readiness to follow high standards of business conduct, including:

- enhancing and protecting the University’s business ethics;
- regulation and streamlining of corporate behavior of Employees in complex and ambiguous situations from the point of view of compliance with the principles of ethics, honesty and integrity;
- increasing the level of the University’s corporate culture.

2.7. The main objectives of the Code are:

- promoting the achievement of the University’s strategic goals;
- orientation of Employees towards common corporate values and improving the corporate culture of the University;
- understanding and application of internal corporate ethical standards by Employees in daily activities;
- prevention of conflicts of interest, as well as their effective resolution if they arise;
- rapid adaptation of new Employees to the work process and working conditions at the University.

2.8. By adopting, periodically improving and strictly complying with the provisions of the Code, the University confirms its intention to promote the development and improvement of business conduct based on the principles of ethics and responsibility.

2.9. The Code is intended to form a system of University values that determine

business behavior and forming the Company's reputation.

2.10. The University accepts and follows the provisions of this Code in the relationship between the AMP and TS, students and interested parties, to make business decisions, both strategically important and in everyday situations.

2.11. The Code is as the basis for the formation of relationships at the University, respect for teaching activities in the public consciousness, self-control of teaching staff and is subject to familiarization with all participants in the educational process.

3. Corporate values and principles

The fundamental corporate values on the basis of which the University's activities are formed are:

3.1. Partnership for the benefit of society

Implementation of the principle that any "Win-Win-Win", in accordance with the mutually beneficial cooperation of two parties (Win-Win), should bring benefits, a synergy effect, to a third party - society (Win).

3.2. Leadership

The proactive worldview "I am a Leader" of every student, employee, teacher and partner of AlmaU allows them to be agents of change, demonstrate entrepreneurial thinking and culture, manage themselves, their emotions, their development, show their own individuality, have dignity and honor, respect themselves and others.

3.3. Liberty

AlmaU promotes the philosophy of freedom of spirit, thought and speech, and the value of work-life balance. We hold high the foundations of academic, research and entrepreneurial freedom.

3.4. Responsibility

AlmaU is responsible for its results to partners, clients, colleagues and society as a whole, anticipating the needs of society, working proactively.

3.5. Team spirit and synergy

From a team of people, its composition, professionalism, efficiency, cohesion, focus on results and synergy determines the success of the university.

4. Basic ethical principles that shape good business conduct of the University employees

4.1. Integrity

The University makes every effort to prevent any situations in which the personal interests of Employees may conflict with the interests of the Company. Any abuse of official powers for one's own benefit or for the benefit of third parties, or to the detriment of the University, must be excluded.

4.2. Honesty and objectivity

All management decisions and actions of University Employees are characterized by honesty, openness and objectivity. Prejudice towards both your job responsibilities and colleagues is not allowed.

4.3. Image reputation

Management decisions and actions of Employees must be consistent with the goals of maintaining a positive image of the University. Employees direct their efforts to prevent situations where their actions could negatively affect the business reputation of the University.

4.4. Transparency

The activities of the Employees are aimed at information openness, providing all interested parties with reliable, complete and objective information about their activities, subject to the principle of confidentiality, when necessary and not contrary to the law.

4.5. Respect

The University follows the principles of respect for others and integrity. Respect and trust allow us to increase work efficiency by reducing bureaucratic and administrative barriers, while remaining a dynamic and effective team. Each Employee, regardless of their position, treats their colleagues with understanding and respect.

5. Standards of business and corporate ethics

5.1. Ethics of employee relations

5.1.1. University employees accept responsibilities to perform professional functions conscientiously and reasonably in the interests of the University, avoiding conflicts of interest.

5.1.2. To achieve the strategic goals of the University, they make business decisions taking into account the fundamental values and principles of business ethics and bear responsibility for the implementation of the tasks assigned to them as provided for by the current legislation of the Republic of Kazakhstan and the internal regulations of the University.

5.1.3. Employees, when performing their official duties, must be guided by the interests of the University, and not by personal relationships or personal gain.

5.1.4. Each Employee is obliged to conscientiously follow the principles provided for in this Code, comply with the requirements of the employment contract, labor regulations, job descriptions, regulations and other acts of the University, and also be aware of their personal responsibility for their violation or non-compliance;

5.1.5. When hiring new Employees, the University is guided by the legislation of the Republic of Kazakhstan and the requirements of the University acts, giving preference to candidates with higher qualifications and production experience, without allowing any discrimination on any grounds. Recruitment and promotion of personnel is carried out solely on the basis of professional abilities, knowledge and skills;

5.1.6. The University encourages Employees seeking self-education and professional development, and creates equal and optimal conditions for advanced training of Employees of all levels in accordance with training and professional development programs for Employees;

5.1.7. The University's policy in the field of occupational safety and health provides for ensuring safe working conditions and improving the health of Workers;

5.1.8. Employees must make every effort to perform highly professional work, treat the University property with care, and use it rationally and effectively;

5.1.9. The University is responsible for making decisions free from the emergence of a Conflict of Interest at any stage of this process;

5.1.10. University employees must behave in such a way as to avoid situations in which a Conflict of Interest may arise, either in relation to themselves (or persons associated with them) or in relation to others.

5.1.11. Employees provide each other with reliable information in a timely manner, without violating confidentiality standards and taking into account the decisions of the Management and acts of the University,

5.1.12. Decision-making by the University Management should be based on the principles of transparency and adequacy.

5.1.13. Discrimination on gender, age, race, political, religious grounds and other similar grounds is not permitted;

5.1.14. Any situation leading to a violation of the rights of Workers must be considered in accordance with the legislation of the Republic of Kazakhstan and internal documents of the University.

5.1.15. Heads of structural divisions at all levels must make management decisions that comply with the requirements of the Code; moreover, they must strive by personal example to demonstrate commitment to the provisions of the Code, devote time to consultations and mentoring, uniting the team into a team united by a common mission, values and principles;

5.1.16. Relationships between University employees are built on the principles of mutual respect, mutual trust, goodwill, honesty and non-bias.

Following the rules of etiquette, the University employees:

- Do not allow rudeness, the use of a raised tone in conversation with colleagues, foul language, infringement of honor and dignity;
- Do not allow unethical actions or causing moral or material damage;
- Do not show intemperance, neglect, or aggression;
- Do not show your bad mood to colleagues;
- Do not discuss colleagues' salaries;
- Do not discuss the personal or professional qualities of colleagues in their absence;
- Contribute to the creation of a stable and positive environment in the team;
- Create and maintain an ethically comfortable work environment;
- Are always open and ready for constructive, result-oriented communication;
- Are always ready to provide help to anyone who asks for it;
- Take initiative and make proposals aimed at improving the activities of the University;
- Are punctual, fulfill their obligations to the University and to colleagues clearly and on time;
- Use their own work time and the time of your colleagues rationally;
- Handle the University property and equipment with care, following the instructions set forth in internal documents that help to properly handle its equipment or resources;
- Always comply with safety rules and labor protection standards, maintain safe working conditions;
- Accurately reflect transactions in financial statements and other accounting documentation in accordance with the principle of transparency of the University's activities;
- Do not cause damage to the reputation of the University and (or) the reputation of its Employees;
- Do not use their official position to resolve a conflict situation in their favor and (or) for the benefit of themselves or third parties associated with such Employee;
- Do not allow the dissemination of false information, concealment or distortion of facts, or the misuse of information obtained in the course of performing their official duties in their activities, or in relations with the media;
- Comply with the Law of the Republic of Kazakhstan “On Personal Data and Their Protection”;
- Do not provide third parties with the mobile phone numbers of colleagues without their permission;

5.2. Ethics in relationships with business partners

5.2.1. The University places particular emphasis on maintaining and developing sustainable and trusting relationships with stakeholders in both the short and long term.

5.2.2. The University values its business reputation and image. The University's external relations are built on the principles of mutual respect, openness, integrity, responsibility and transparency.

5.2.3. The University complies with the terms of contracts/agreements with business partners and fulfills its obligations towards them.

5.2.4. The University guarantees timely and complete consideration of all requests, wishes and claims of partners. In case of disagreements and disputes, he gives preference to negotiations and finding a compromise.

5.2.5. The University selects suppliers of goods and services that offer the lowest prices, the best quality, terms of supply of goods and services and enjoy a good reputation, in accordance with the legislation of the Republic of Kazakhstan.

5.2.6. The University adheres to fair and free competition and condemns all manifestations of unfair competition, which can not only negatively affect its reputation, but also undermine the trust of partners in the University. In this regard, the University expects the same fair competition from its partners.

5.2.7. The University does not allow its business partners to be provided with unjustified benefits and privileges.

5.3. Ethics of public relations

5.3.1. The University is aware of its social responsibility to the public. strives to have a positive impact on the solution of socially significant issues, strives to serve society, supports programs aimed at increasing the level of knowledge and education of the population in the region of operation, and other social programs.

5.3.2. The University views itself as an integral element of the public environment with which it strives to establish strong relationships, based in which it operates and on the principles of respect, trust, honesty and fairness.

5.3.3. The University strives to establish constructive relationships with organizations (public, non-governmental and others) in order to improve public relations, reduce the impact of its production activities on the environment, protect the health and ensure labor safety of Workers.

5.4. Ethics of relations with the media

5.4.1. The University's information policy provides for the creation of the opportunity to obtain free and easy access to information about the University.

5.4.2. The University's corporate website contains publicly available information about the University, its activities, contact information, etc.

5.4.3. The University employees providing information to the media are personally responsible for their accuracy and the absence of information constituting a commercial secret, as well as confidential information.

5.4.4. Employees may provide information to the media regarding the activities of the University on behalf of or with the permission of management

5.4.5. The University employees do not speak publicly, speak out, write on social networks or give interviews on any topic on behalf of the University without direct instructions from management or expressly granted authority;

5.4.6. When communicating with media representatives, provides only officially approved, correct information and complies with ethical standards;

5.4.7. It is not permitted to distribute confidential information about the University and University employees to third parties, including providing it to the media. Employees are prohibited from disclosing commercial, official and other secrets protected by law, except in cases where the requirement to provide this information is established by the legislation of the Republic of Kazakhstan, as well as from using the information for private purposes.

6. Anti-corruption

6.1. Corruption is the abuse by an Employee of his or her authority or the trust placed in such person by the University in which such Employee seeks to exercise his or her power or authority for compensation or the provision of material assets.

6.2. University employees do not have the right to demand or accept remuneration, gifts, services or other material assets on their own behalf or in favor of third parties persons for the performance of their official duties, or in exchange for providing advantages when purchasing goods or services, except for cases provided for by this Code or the current legislation of the Republic of Kazakhstan.

6.3. Employees must never directly or indirectly accept bribes, transaction commissions, or any other material value or benefit from other Employees or third parties for the performance of duties that they must perform in accordance with the employment contract or any other agreement with the University.

6.4. Employees and teachers are obliged to counteract any manifestations of corruption both on the part of employees and teachers and students and take measures to suppress it;

6.5. Violation of legislation in this area may result in the imposition of fines and bringing the guilty Employees to administrative or criminal liability.

7. Working sessions, meetings, negotiations

7.1. Working sessions, meetings and negotiations are scheduled for a specific time, based on the interests and capabilities of all participants. Therefore, timely attendance at these events is mandatory for every University employee. Lateness to work meetings, meetings and negotiations is not permitted.

7.2. If it is impossible to attend a scheduled event at the agreed time, the employee must notify his immediate supervisor and other interested parties in advance.

8. Feedback and business correspondence

8.1. Since each letter is a business card and a reflection of a business position, it is necessary to promote the productivity of communication and know the basic rules and principles of correspondence:

- Mutual respect between opponents for each other's personality and business position;
- Attention to the business interests of the opponent;
- Punctuality in the exchange of information and indication of deadlines ;

- A clearly formatted the “Subject” field and a greeting, a personal appeal to the addressee/recipients are required;
- Addressing accuracy - correct filling of the “To” and “Copy” fields. The full name in the direct addressee field (“To”) is the addressee from whom a response is expected, the full name in the “Copy” field is the addressee who should be aware of the question;
- When forwarding letters, it is necessary to save the correspondence history;
- Confidentiality and chain of command must be taken into account;
- The information in the letter is structured and concise;
- At the end of each letter, contact information about the artist is indicated;
- A prompt response is required - a response to a letter within two to three hours with information about the acceptance of the letter and information about the response time (if required). The response to the letter/request is provided within the agreed time frame without delay. Letters/requests from colleagues and clients are prohibited from being left unanswered.

9. Professional Image: Appearance

9.1. The appearance of an employee is the basis of official etiquette and is an integral part of the University’s corporate culture.

9.2. The appearance of Employees must comply with the corporate Dress Code: Strict style - business, conservative suit for men and a classic suit or dress for women whose activities involve communicating with clients, negotiating with partners, presentations, trainings and any other functions related to representing the University in the external environment,

Moderate style - restraint, calm colors, black or dark blue jeans are allowed (without scuffs, holes and rhinestones), classic straight cut, but excludes sports style, lack of bright, eye-catching accessories, rough shoes, short skirts, neckline, transparent clothing - for employees whose activities are not related to working with external clients and partners.

9.3. If the employee does not have meetings in the office or outside, or contacts with clients every week on Fridays, a free style of Smart casual (a mixture of not too sporty style and light elegance) is acceptable;

9.4. Technical personnel whose work involves loading/unloading equipment and materials, maintenance and repair of equipment, as well as cleaning premises are allowed a simplified uniform in agreement with their immediate supervisor;

9.5. It is unacceptable to use cosmetic aromatic substances (for example, perfume or cologne) in excess quantities, in which the smell of such a substance becomes excessively noticeable to other persons and may become an irritant for them;

9.6. University employees must observe the rules of personal hygiene and personal care. Odors emanating from a University Employee that indicate non-compliance with these rules are unacceptable;

9.7. Control over compliance with the appearance of Employees is assigned to immediate supervisors.

10. Privacy

10.1. When hired, the Employee signs a “Non-Disclosure Agreement” as one of the conditions of employment. Confidential information includes the following, but the list is not limited to this list; detailed information is indicated in the “List of information that is confidential information”:

- Salary, compensation and benefits;
- Financial and accounting information;
- Marketing plans;
- Current and planned projects and proposals;
- Payroll data;
- Personal data of employees;

10.2. Information is the most important asset of the University. The University prohibits the transfer of any information, except for specially permitted image events.

10.3. Disclosure of confidential information is a violation of the terms of the TD by the employee and entails liability up to and including termination of the TD. Similar sanctions may be applied to an employee who allows any transfer of information to third parties or organizations that is detrimental to the image and reputation of the University.

10.4. Employees are strictly prohibited from opening faulty equipment on their own and performing any work to restore the equipment's functionality. It is prohibited to download information or independently install any additional devices or software on your personal computer without the appropriate permission from the information technology department.

10.5. In order to ensure the protection of confidential information, as well as information constituting a trade secret of the University, employees are prohibited from leaving any working documents, including draft documents, unattended at the workplace. 10.6. All unnecessary documents generated during the work process (drafts, draft documents, printouts) must be destroyed using a shredder or manually. It is prohibited to throw whole (not torn) documents or individual sheets of documents, including draft documents, into the trash bin.

10.7. If it is necessary to leave the workplace, the employee is obliged to lock his personal computer in order to prevent the possibility of unauthorized access to it. Employees are prohibited from sharing their operating system password with other employees and third parties.

10.8. Upon completion of work, employees are required to tidy up their workplace and turn off their personal computer.

11. Participation in the activities of political, religious and public organizations

11.1. The University does not limit the participation of Employees in the activities of political, religious and public organizations outside of working hours. Religious and political preferences are a personal matter of Employees and should not interfere with their performance of their duties and interaction with colleagues.

11.2. Company employees participating in political, religious and social activities must not refer to the University and must act as private individuals.

11.3. Employees do not have the right to use the resources, image and reputation of the University in carrying out political, religious and social activities.

12. Appropriation of corporate opportunities

12.1. Each employee must remember that he represents the face of the University. Therefore, it is extremely important to remember that every action of an employee can be perceived as an action of the University as a whole.

12.2. Many employees, by the nature of their work, are involved in fairly close interaction with third-party organizations and people. Often, work interactions may involve receiving gifts, monetary rewards, services, and other benefits. When such situations arise, it is necessary to

remember that all these benefits relate not so much to a specific person, but to the University as a whole. And it is unacceptable to use your official position to obtain any benefits from external contractors.

12.3. In particular, employees must not accept gifts, services, payments, special privileges, or discounts for personal recreation from any person or organization that competes with, does, or intends to do business with the University.

12.4. If an employee is offered a gift (a service in a certain situation) and refusal may lead to negative consequences for the business, then the fact of acceptance of such a gift must be reported to the immediate supervisor.

13. Environment, health and safety

13.1. AlmaU is a socially responsible University that pays great attention to issues of labor protection, industrial and personal safety, and ecology.

13.2. Each Employee is responsible for compliance with requirements aimed at ensuring personal safety, the safety of colleagues and the environment.

13.3. Each Employee is responsible for compliance with all laws and regulations. regulations and provisions on environmental protection, technology and safety standards. labor protection and supports them in the workplace.

13.4. Each manager is required to instruct, support and supervise the activities of Employees regarding compliance with safety and environmental regulations.

14. Responsibility . Compliance with the Code

14.1. In their professional activities, all employees are required to comply with the norms, procedures, regulations, regulations, rules and acts established by the University. Compliance with the norms of this Code is mandatory for all University Employees, regardless of their position and position at the University.

14.1.1. Employees must comply with the regulations and acts of the University related to the security regime and work with confidential information.

14.2. All facts of violation of ethical standards in accordance with this Code must be considered in accordance with the norms of the legislation of the Republic of Kazakhstan, acts and regulations of the University.

14.3. If an employee has questions about the application of the rules and regulations of this Code or is unsure of the compliance of actions or decisions, he can contact:

- to your immediate supervisor;
- to an HR employee or HR Director;
- to the Corporate Ethics Commission;
- to the Ombudsman ;

14.4. The University expects that any interested party other than an employee (for example, a student or supplier of products, services, etc.) may also report violations by a University employee that become known to them. 14.5. The person who received the appeal is obliged to check its accuracy with the involvement of his immediate supervisor. If the facts stated in the application are confirmed, materials about this and recommendations for further actions are transferred to HR.

14.6. For violation of the Code, depending on the severity of the violation committed and in accordance with the legislation of the Republic of Kazakhstan, the following measures may be applied to the employee:

- disciplinary action;
- deprivation of bonuses or other incentives;
- denial of promotion;
- dismissal;

14.7. If the identified fact is related to a violation of the legislation of the Republic of Kazakhstan that has signs of criminal or administrative offenses, then the information is transmitted by the Legal Department to law enforcement agencies.

15. Rights and obligations of the Ombudsman

15.1. The Ombudsman is appointed by the Board of Trustees.

15.2. The main functions of the Ombudsman are to collect information about non-compliance with the provisions of the Code, consult employees and the Board of Trustees on the provisions of the Code, initiate consideration of disputes regarding violation of the provisions of the Code and participate in it.

15.3. The Ombudsman has the right to:

- initiate procedures to identify violations of the provisions of the Code, both on the basis of received requests and on their own initiative;
- contact the Employees and the Board of Trustees personally regarding issues of non-compliance with the Code;
- provide Employees and the Board of Trustees with explanations and interpretation of the provisions of the Code.

15.4. The Ombudsman is obliged to:

- provide protection (within the framework of the procedures established by labor legislation) of Employees during the period of procedures for considering disputes regarding violations of the Code, in case a situation arises of their forced dismissal due to the initiation of consideration of such cases;
- participate in the consideration of issues regarding non-compliance with the Code;
- keep records of requests from Employees, as well as business partners regarding non-compliance with the provisions of the Code;
- within five working days, provide explanations of the provisions of the Code to University Employees if they apply;
- maintain independence and impartiality when participating in the resolution of disputes regarding issues of non-compliance with the Code;