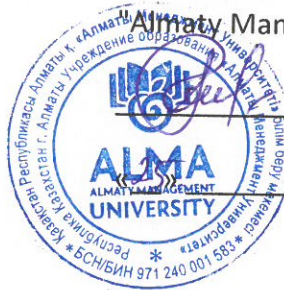




ALMA
ALMATY MANAGEMENT
UNIVERSITY

Approved by
Rector of Educational Institution
"Almaty Management University"



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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”

Code – this 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 has an employment relationship with the employer and directly performs work under an employment contract;

TS – professorial and teaching staff;

AMP – administrative and management personnel – all University Employees with the exception of the teaching staff;


Ethics is a set of norms of behavior;

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

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

Conflict of interest – a situation in which the personal interest of an Employee influences or may influence the impartial performance of official duties;

Ombudsman – a person appointed by the Board of Trustees of the University (possibly from among the employees), who promotes the implementation and observance of the principles of corporate ethics at the University.

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The University's management includes the President, Rector, Vice-Rectors, and Managing Directors of the University.

2. Purpose and scope of the document

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 the TS).

2.2. This Code is introduced with the aim of strengthening and developing the corporate culture of the University, increasing the level of motivation of Employees for conscious support of 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 corporate conduct, social responsibility and other issues of business ethics adopted for the University Employees.

2.5. The provisions of the Code must be understandable and clear to all its Employees, however, the Code cannot provide an exhaustive regulation of all issues related to the ethics of corporate conduct that may arise at the University. In the event that any issue is not regulated by the Code, as well as in the event of controversial situations when an 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 the Corporate Ethics Commission.


2.6. The objectives of the Code are to create a sustainable corporate culture and system corporate values, confirmation of the University's continued commitment to high standards of business conduct, including:

- enhancing and protecting the business reputation of the University;
- regulation and streamlining of corporate standards of behavior of Employees in complex and ambiguous situations from the point of view of compliance with the principles of ethics, honesty and integrity;
- raising 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 improvement of the University's corporate culture;
- understanding and application of corporate ethical standards by employees in their 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.

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2.8. By adopting, periodically improving and strictly observing 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 corporate values that determine business behavior and shape the University's reputation.

2.10. The University accepts and follows the provisions of this Code in its relationships with administrative and management personnel and teaching staff, students and interested parties, for making business decisions, both strategically important and in everyday situations.

2.11. The Code serves as the basis for the formation of relationships at the University, a respectful attitude towards pedagogical activity in the public consciousness, self-control of the behavior of Employees and is subject to familiarization by all participants in the educational process.

3. Corporate values and principles

The fundamental corporate values on which the University's activities are based are:

3.1. Leadership

We strive to be change leaders, demonstrate an entrepreneurial mindset and culture, and manage our own development.

3.2. Entrepreneurship

We actively develop the idea of entrepreneurship as a driving force for the development of the economy, science and public life through the dissemination of entrepreneurial thinking.

3.3. Honesty

We are committed to honesty as the basis for building open relationships between people, and in all our activities we adhere to the ethical principles of fairness, transparency and decency.

3.4. Sustainable development

We contribute to the life of society through education, the development of traditions, the formation of the civic position of youth based on the principles of thrift and equal opportunities for development.

3.5. Responsibility

We fulfill our obligations and consistently achieve our goals, guided by the principles and standards of professional ethics, and work according to the "Win-Win-Win" principle to ensure the synergistic success of the university, business and the state.

4. Basic ethical principles that shape proper business conduct University employees


4.1. Good faith

The University makes every effort to prevent any situations in which the personal interests of Employees may conflict with the interests of AlmaU. Any abuse of official powers for personal 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 the University Employees are characterized by honesty, openness and objectivity. Biased attitudes towards both their job responsibilities and colleagues are not allowed.

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4.3. Image and reputation

Management decisions and actions of Employees must comply with the goals of maintaining a positive image of the University. Employees direct their efforts to preventing situations where their actions may negatively affect the business reputation of the University.

4.4 Transparency

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

4.5. Respect

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

5. Standards of business and corporate ethics

5.1. Ethics of Employee Relations

5.1.1. University employees undertake to perform their professional functions in compliance with the highest standards of conduct and professional ethics, in good faith and reasonably, in the interests of the University, and avoiding Conflicts of Interest.

5.1.2. In order 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 set before them, as provided for by the current legislation of the Republic of Kazakhstan and the internal acts 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 in this Code, comply with the requirements of the TD, work regulations, job descriptions, regulations and other acts of the University, and also be aware of his 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, gives preference to candidates with higher qualifications and production experience, without allowing any discrimination on any grounds. Selection and promotion of personnel is carried out exclusively on the basis of professional abilities, knowledge and skills.

5.1.6. The University encourages Employees who strive for self-education and professional development, and creates equal and optimal conditions for improving the qualifications of Employees at all levels in accordance with the training and professional development programs of Employees.

ensures safe and secure work in the field of occupational safety and health. working conditions and improving the health of workers.

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5.1.8. Employees must make efforts to perform highly professional work, treat the University's property with care, and use it rationally and effectively.

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

5.1.10. University employees must conduct themselves 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 rules and taking into account the decisions of the Management and the acts of the University.

5.1.12. The decision-making by the University Management must be based on the principles of transparency and adequacy.

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


5.1.14. Any situation leading to a violation of the rights of Employees must be considered in accordance with the legislation of the Republic of Kazakhstan and the 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 to demonstrate by personal example their commitment to the provisions of the Code, devote time to consultations and mentoring, and to 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 impartiality.

In compliance with the rules of etiquette, University employees:

- do not allow rudeness, the use of raised voices in conversation with colleagues, foul language, or the infringement of honor and dignity;
- do not allow unethical actions or causing moral or material damage;
- do not show intemperance, disdain, or aggression;
- do not show your bad mood to your 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 atmosphere in the team;
- create and maintain an ethically comfortable working atmosphere within the team;
- always open and ready for constructive communication aimed at results;
- always ready to provide assistance to anyone who asks for it;
- are proactive and make proposals aimed at improving the University's activities;
- are punctual, clearly and on time fulfill their obligations to the University and to colleagues;
- uses his/her working time and the time of his/her colleagues rationally;
- handle the University's property and equipment with care, following the instructions set out in internal documents that help to properly handle its equipment or resources;

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- always comply with safety regulations and labor protection standards, maintain safe conditions in the workplace;
- 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) to the advantage 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 relationships 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 of relationships with business partners

5.2.1. The University pays special attention to 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 basis of adherence to 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, requests and claims of partners. In case the emergence of disagreements and disputes, prefers negotiations and the search for compromise.

5.2.5.


5.2.6. The University adheres to fair and free competition and condemns all manifestations of unfair competition that may not only negatively affect the 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 the provision of unjustified benefits and privileges to business partners in its activities.

5.3. Ethics of Public Relations

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

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

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5.3.3. The University strives to establish constructive relations 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 the safety of its employees.

5.4. Ethics of Relations with the Mass Media

5.4.1. The University's information policy provides for the creation of the opportunity to obtain free and unencumbered 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. University employees providing information to the media bear personal responsibility for its accuracy and the absence of information constituting a commercial secret, as well as information of a confidential nature, for the transfer of personal data to third parties.

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

5.4.5. University employees do not speak publicly, make statements, write on social networks, or give interviews on any topic on behalf of the University without a direct order from management or expressly granted authority.

5.4.6. When communicating with media representatives, University Employees provide only officially approved, correct information and comply with ethical standards.

5.4.7. It is prohibited to disseminate confidential information about the University and personal data of 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 using this information for personal purposes.

6. Anti-corruption

6.1. Corruption is the abuse by an Employee of his/her authority or of the trust that has been placed in such person by the University, in which such Employee wishes to take advantage of the existing power or authority for remuneration or the provision of material assets.


6.2. Employees of the University 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 for the performance of their official duties, or in exchange for the provision of advantages when purchasing goods or services, except in cases provided for by this Code or the current legislation of the Republic of Kazakhstan.

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

6.4. Employees are obliged to counteract any manifestations of corruption both on the part of administrative and management staff and teaching staff, as well as students, and to take measures to suppress it.

6.5. Violation of legislation in this area entails administrative or criminal liability of the guilty Employees.

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7. Working meetings, conferences, negotiations

7.1. Working conferences, meetings and negotiations are scheduled for a specific time based on the interests and capabilities of all participants. Therefore, timely presence at these events is mandatory for each University Employee.

7.2. If it is impossible to attend a planned event at the agreed time, the Employee must notify the immediate supervisor and other interested persons 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 productive communication and know the basic rules and principles of correspondence:

- mutual respect of opponents for each other's personality and business position;
- attention to the business interests of the opponent;
- punctuality in the exchange of information and the indication of deadlines ;
- o a clearly formatted "Subject" field and a greeting, a personal address to the addressee/ addressees;
- accuracy of addressing – 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 issue;
- When forwarding letters, it is necessary to save the correspondence history;
- confidentiality and subordination must be taken into account;
- the information in the letter is structured and concise;
- at the end of each letter, contact information about the performer is indicated;
- a prompt response is required – a response to a letter within two to three hours with information about the receipt 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 delays;
- It is prohibited to leave letters/requests from colleagues and clients unanswered.


9. In the appearance of workers

9.1. The employee's appearance is the basis of service 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 communication with clients, negotiations with partners, presentations, trainings and any other functions related to the representation of the University in the external environment,

Moderate style – restraint, calm colors, black or dark blue jeans are allowed (without scuffs, holes or rhinestones), classic straight cut, but excludes a sporty style, no bright, eye-catching accessories, rough shoes, short skirts, low-cut, 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 of it, or contacts with clients on a weekly basis :

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- on Wednesdays, wearing clothes with elements of national clothing is encouraged;
- on Fridays, a free style of Smart Casual is acceptable (a mixture of not too sporty style and light elegance). Also, in order to support the corporate clothing brand, wearing T-shirts and sweatshirts with a logo is welcome on Fridays AlmaU.

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

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

9.6. University employees must comply with the rules of personal hygiene and self-care. Odors emanating from a University employee that indicate non-compliance with the said rules are unacceptable.

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

10. Confidentiality

10.1. Upon employment, the Employee signs the "Agreement on Non-Disclosure of Confidential Information" as one of the conditions of employment. The following is considered confidential information, but the list is not limited to this list; detailed information is provided in the "List of Information Constituting Confidential Information":

- salary, compensation payments and benefits;
- financial and accounting information;
- marketing plans;
- ongoing 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 employment contract by the Employee and entails liability up to and including termination of the employment contract. Similar sanctions may be applied to an Employee who has allowed any transfer to third parties or organizations of information that damages the image and reputation of the University.

10.4. In order to ensure the protection of confidential information, as well as information constituting a commercial secret of the University, Employees are prohibited from leaving any working documents, including draft documents, unattended at the workplace.

10.5. All unnecessary documents generated in the course of work (drafts, draft documents, printouts) are subject to destruction 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 can.

10.6. In case of necessity 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 telling other employees and third parties their password for entering the operating system.

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10.7. Upon completion of work, Employees are required to tidy up their work area and turn off their personal computer.

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

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

11.2. Employees of the Company who participate in political, religious and social activities must not refer to the University and must act as private individuals.

11.3. Employees have no right to use the resources, image and reputation of the University when carrying out political, religious and social activities.

12. Abuse of official position

12.1. Each Employee must remember that he/she represents the face of the University. Therefore, it is extremely important to remember that every action of the 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 be associated with 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 as to the University as a whole. It is unacceptable to use your official position to receive any benefits from external contractors.

12.3. In particular, Employees must not accept gifts, services, payments, special privileges, or discounts in organizing personal recreation from any person or organization that competes with, conducts, or intends to conduct 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, rules, regulations and provisions on environmental protection, technical and occupational safety standards, and labor protection and maintains them in the workplace.

13.4. Each manager is obliged to instruct, support and control the activities of Employees with respect to compliance with safety regulations and environmental protection.

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14. Responsibility . Compliance with the Code

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

14.1.1. Employees must comply with the University regulations and acts related to security and working 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 regarding the application of the rules and regulations of this Code or is unsure of the compliance of actions or decisions, he may contact:

- to the immediate supervisor;
- to the HR Department employee or the HR Managing Director;
- in the Corporate Ethics Commission;
- to the Ombudsman.

14.4. The University expects that any interested person who is not an Employee (e.g. a student or a supplier of products, services, etc.) may also report violations by a University Employee that have become known to them. 14.5. The person who has received the request is obliged to verify its veracity with the involvement of their immediate supervisor. If the facts stated in the request are confirmed, the materials about this and recommendations for further actions are transferred to the HR Department.

14.6. For violation of the norms of the Code, depending on the degree of the violation committed, disciplinary measures may be applied in accordance with the labor legislation of the Republic of Kazakhstan .

1 4.7. If the identified fact is related to a violation of the legislation of the Republic of Kazakhstan, having signs of criminal or administrative offenses, then the information is transferred by the Legal Department to law enforcement agencies.


14.8. Any Employee must report to the HR Department or the Corporate Ethics Commission by email or in writing any actual or suspected actions that discriminate against or violate the rights of Employees .

14.9. The University shall take all available measures to prevent, stop, investigate or eliminate the consequences or alleged actions that discriminate against or violate the rights of Employees , and shall ensure the confidentiality and protection of the interests of Employees who have reported actual or alleged discriminatory actions.

15. Rights and responsibilities 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 on non-compliance with the provisions of the Code, to consult Employees and the Board of Trustees on the provisions of the Code, to initiate the consideration of disputes on violations of the provisions of the Code and to participate in them.

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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 its own initiative;
- contact Employees and the Board of Trustees personally on issues of non-compliance with the Code;
- explanations and interpretations of the provisions of the Code to Employees and the Board of Trustees .

15.4. The Ombudsman is obliged to:

- ensure protection (within the framework of the procedures established by labor legislation) of Employees, during the period of procedures for considering disputes on issues of violation of the provisions of the Code, in the event of a situation of their forced dismissal due to the initiation of consideration of such cases;
- participate in the consideration of issues regarding non-compliance with the provisions of the Code;
- keep records of appeals 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 request it;
- maintain independence and impartiality when participating in the consideration of disputes regarding non-compliance with the Code;

their gender identity and/or expression.

16. Final Provisions

16.1. This Code is approved by the Rector of the University and comes into force from the moment of its approval.

16.2. All changes and additions to the Code (approval of the Code in a new edition) are made by decision of the Rector of the University.