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Content

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1. Definitions and abbreviations

1.1. The following abbreviations, terms and definitions are used these regulations on the Corporate Ethics Commission:

University – Educational Institution "Almaty Management University";

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

EC - Employment contract;

Employee - employees related to the University by any contractual or agreement relationships, including temporary ones;

Third parties are people who are not connected with the University by contractual or contractual relations, including temporary ones;

TS - faculty and teaching staff;

AMP - administrative and managerial personnel;

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, ethical standards embodied in various aspects of the University's activities, and which make it unique;


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

PK – the Republic of Kazakhstan.

2. General provisions

2.1. Corporate Ethics Commission (hereinafter referred to as the Commission) of the Educational Institution "Almaty Management University" (hereinafter referred to as - University) can be organized for purposes to consider the corporate communications, disciplinary issues of the University employees, compliance or non-compliance with the legislation of the PK, the Labor Code of the PK, the Internal Labor Regulations, the Code of Corporate Ethics (hereinafter Code), regulations, procedures and other acts of the University.

2.2. The Commission in its activities is guided by the Constitution of the Republic of Kazakhstan, PK legislation and carries out its activities in accordance with The Charter, these Regulations and other acts of the University.

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3. Main aims and objectives of the Commission

3.1. The aim of creation and activities of the Commission is to facilitate the implementation of principles and rules of business behavior based on corporate values, specified by the Code.

3.2. Minimization and elimination of risks associated with a possible conflict of interest.

3.3. The main objective of the Commission is to organize work on the implementation of the requirements and provisions of the Code, ensuring a comprehensive approach and coordination of the activities of the University's structural divisions.

3.4. To achieve the specified goals and objectives, the Commission explains to employees the provisions of the Code and the procedure for its application, considers cases of conflict of interest and makes proposals and decisions on taking measures aimed at preventing or eliminating or limiting interests and (or) its consequences, in order to protect the interests of the University.

4. Composition and procedure for creating the Commission

4.1. The Regulation on the Commission, its personnel are created and changed by order of the Rector.

4.2. The Commission consists of the Chairman, his deputy, secretary and at least three members of the Commission.

4.3. The composition of the Commission is approved by the Rector's order and the structural description of the Commission corresponds to the following scheme:

- Chairman of the Commission;
- Deputy Chairman of the Commission;
- Members of the Commission;
- Secretary of the Commission.


4.4. The Commission is managed by the Chairman of the Corporate Ethics Commission.

4.5. During the temporary absence of the Chairman of the Commission, his duties are performed by the Deputy Chairman of the Commission.

4.6. The Chairman of the Commission organizes the work of the Commission, convenes and holds meetings of the Commission, organizes the keeping of minutes at meetings, determines the agenda of the meeting of the Commission, approves the list of persons invited to the meeting, organizes and monitors the implementation of the decisions of the Commission, resolves other issues necessary for the work of the Commission, approves the decision to hold a closed meeting of the Commission.

4.7. The Secretary of the Commission, as a rule, is an employee of the legal or personnel service of the University, authorized by the Rector's order.

4.8. The Secretary of the Commission informs the members of the Commission about holding the meetings of the Commission, organizes the collection, analysis, summarization, verification of materials on the issues of the agenda of the meeting of the Commission in accordance with the instructions of the Chairman of the Commission, decisions of the Commission. Carries out the distribution of materials for the meetings of the Commission, keeps minutes of the meetings of the Commission, prepares and provides extracts from the minutes of the meetings of the Commission in accordance with the instructions of the Chairman of the Commission, forms the documents of the Commission and transfers them for archival storage in accordance with the established procedure.

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4.9. The Secretary of the Commission has the right to receive timely information and materials necessary for the proper performance of his duties.

4.10. The members of the Commission personally participate in in-person meetings of the Commission, discuss issues under consideration and develop collegial decisions, vote on issues on the agenda of the Commission meetings, provide information within the limits of their competence on issues considered at the Commission meetings, participate in the preparation of explanations, recommendations and proposals on issues related to the competence of the Commission, and carry out other actions in accordance with these Regulations.

4.11. The Meeting of the Commission:

- is considered authorized If at least 2/3 from the total number of members of the Commission are present at the meeting,
- are held whenever required;

If necessary, closed meetings may be held by decision of the Chairman of the Commission.

4.12. The Commission makes a decision by a simple majority of votes from the number of members of the Commission present at the meeting. In case of a tie, the vote of the chairperson is decisive.

4.13. The participation of the person and (or) persons against whom a disciplinary or other case has been initiated is mandatory at the meeting of the Commission.

4.14. Members of the Commission and other persons participating in the work of the Commission must not use their position and the information received for personal interests;

4.15. The Commission in its activities is guided by the principles of legality, objectivity and fairness.

5. Regulations on the Commission work

5.1. The Commission carries out its activities by holding a meeting on the agenda formed by the secretary of the commission and approved by the chairman of the commission. The commission meeting, by decision of the commission chairman, may be held in person or in absentia.


5.2. The Commission's activities are based on the principles of collegiality, freedom to discuss issues under consideration, reasonable openness, and responsibility for decisions made.

5.3. When making decisions, the Commission is guided by the principle of minimizing the risk of a conflict of interest.

5.4. If a direct or indirect personal interest of a member of the Commission arises that may lead to a conflict of interest when considering an issue included in the agenda of the meeting, he/she is obliged to declare this before the meeting. In this case, the member of the Commission does not participate in the consideration of the issue (is removed).

5.5. The Chairman of the Commission, upon receipt of information containing grounds for holding a meeting of the Commission:

- appoints the date of the Commission meeting no later than ten days from the date of receipt of the specified data (information);
- determines the form of the Commission meeting;
- considers petitions to invite persons to the Commission meeting, makes a decision on their satisfaction (refusal to satisfy them) and on the consideration (refusal to consider) of additional materials during the Commission meeting;
- organizes notification of the person in relation to whom the Commission is

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considering the issue of violation (non-compliance) with the norms of corporate ethics, standards of corporate conduct and (or) compliance with the requirements for the settlement of a conflict of interest (resolution of pre-conflict situations) and other participating persons, about the place and time of the Commission meeting and the issues that will be considered at it.

5.6. The Secretary of the Commission shall send the following documents no later than three working days before the start of the Commission meeting:

- To the members of the Commission - written notification about the place and time of the meeting of the Commission with the attached agenda and materials for the meeting;
- an invitation indicating the agenda items to which they are invited to consider and materials on these items.

5.7. The Commission meeting is held in the presence of the University employee in relation to whom the issue of compliance with the norms of corporate ethics, standards of corporate conduct and (or) requirements for resolving a pre-conflict situation and (or) settling a conflict of interest is being considered.

5.8. Reliable If there is a written request from the employee to consider the issue without his participation, the Commission meeting is held in his absence.

5.9. If the employee fails to appear at the Commission meeting and in the absence of his written request to consider the issue without his participation, the consideration of the issue is postponed, but for no more than three days.

5.10. In case of repeated failure to appear without good reason and expiration of the monthly period established by the Labor Code of the Republic of Kazakhstan, the Commission may decide to consider the issue in the absence of the employee, which is recorded in the minutes of the Commission meeting.


5.11. At the Commission meeting, explanations are heard from the employee in relation to whom the issue of compliance with the requirements of both business conduct and (or) requirements for settling a conflict of interest is being considered, and other persons, materials related to the issues included in the agenda of the meeting are considered.

5.12. The members of the Commission and persons who participated in its meeting do not have the right to disclose information that became known to them during the work of the Commission.

5.13. Based on the results of reviewing the information received during the work, the Commission may make the following decisions:

- establish that the information submitted to the commission is reliable and/or complete;
- establish that the information submitted to the commission is unreliable or incomplete;
- establish that the case under consideration does not contain any signs of violation of corporate ethics standards by the employee and the presence of a conflict of interest;
- establish the fact of violation of corporate ethics standards by the employee and the presence of a conflict of interest. In this case, the Commission makes proposals to the Rector on applying the necessary measures to the employee, as well as on explaining to the latter the need to comply with the requirements for business conduct;
- establish that the case under consideration does not contain any signs of personal interest of the employee that leads or may lead to a conflict of interest;
- establish the fact of the presence of personal interest of the employee that leads or may lead to a conflict of interest. In this case, the Commission makes proposals and recommendations to the Rector aimed at preventing or resolving this conflict of interest;

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- establish the type and recommend to the Rector of the University on imposing a disciplinary punishment;

- terminate the disciplinary punishment.

5.14. The Secretary shall formalize the decisions of the Commission in a protocol, which shall be signed by the members of the Commission who participated in its meeting.

5.15. A member of the Commission who does not agree with its decision shall have the right to state his opinion in writing, which shall be subject to mandatory attachment to the minutes of the Commission meeting.

5.16. A copy of the minutes of the Commission meeting shall be sent to the Rector within five working days from the date of the meeting.

5.17. The Rector shall review the minutes of the Commission meeting and take into account the recommendations contained therein when making a decision on applying disciplinary measures to the employee. The Rector shall inform the Commission of the review of the Commission's recommendations and the decision taken. The Rector's decision shall be announced at the next meeting of the Commission and shall be taken into account without discussion.

5.18. If the Commission establishes signs of a disciplinary offense in the actions (inaction) of the employee, information about this shall be submitted to the Rector for a decision on applying disciplinary measures to the employee, as provided for by the legislation of the RK.

5.19. If the Commission establishes the fact that an employee has committed an action (inaction) containing elements of an administrative offence or a crime, the Chairman of the Commission is obliged to immediately report the commission of the said action (inaction) to the Rector for a decision.

5.20. A copy of the minutes of the Commission meeting or an extract from it is attached to the personal file of the employee in respect of whom the issue of compliance with the requirements for compliance with the standards of corporate ethics and (or) the requirements for the settlement of a conflict of interest is considered.

6. Responsibility of the Commission

6.1. The responsibility for preparing and submitting reports on the activities of the commission rests with the chairman of the commission.

6.2. The members of the commission are responsible for the accuracy of the information and data provided to the management on disciplinary and other matters.