Non-profit Joint Stock Company
“Toraighyrov University”

Approved
by decision of the Board of Directors
of Toraighyrov University NJSC
Minutes No. 7 of 10 September 2022

CODE OF CORPORATE ETHICS

Pavlodar

2022

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1. GENERAL PROVISIONS

This Code has been developed in accordance with the Constitution of the Republic of Kazakhstan, the Labour Code of the Republic of Kazakhstan, the Concept of Anti-Corruption Policy of the Republic of Kazakhstan for 2022–2026, the Laws of the Republic of Kazakhstan “On Education”, “On Science” and “On Non-Profit Organizations”, other regulatory legal acts governing educational activities, joint stock companies and labour relations, orders and guidance documents of the Ministry of Education and Science of the Republic of Kazakhstan and of the Chairman of the Management Board – Rector of the University, the Updated Development Strategy of Toraighyrov University NJSC for 2020–2024, the Code of Corporate Governance, the internal labour regulations and generally accepted moral and ethical standards. It establishes the internal rules and the basic standards of conduct for employees of Toraighyrov University NJSC (hereinafter – the University).

This Code is approved by the Board of Directors in accordance with the Code of Corporate Governance.

The Code of Corporate Ethics (hereinafter – the Code) is intended to regulate the ethical foundations of conduct and the relationships between the participants in the academic, research and administrative and management processes of the University.

The main purpose of the Code is to ensure that employees comply with the accepted standards and norms of business ethics, and to create at the University an atmosphere of mutual respect, goodwill, and scientific and creative cooperation in order to achieve the strategic development goals of Toraighyrov University NJSC and to strengthen the corporate culture and image of the Company.

The main objectives of the Code are:

– to ensure the intellectual, cultural and moral development of the individual;

– to protect the rights, freedoms and legitimate interests of every member of the University community;

– to maintain a favourable moral and psychological climate within the University community;

– to foster patriotism.

All employees and students have the right to honest and fair treatment, regardless of race, colour, language, political or religious beliefs, sex, nationality

or cultural background. Discrimination and harassment of any kind are contrary to this Code and are unacceptable.

In the event of a breach of any of the requirements of the Code, disciplinary sanctions and other measures of liability shall be applied to the employee in accordance with the legislation of the Republic of Kazakhstan and the applicable regulatory documents.

The provisions of the Code are binding on all full-time employees, on persons working under contracts for the performance of specific work, and on employees of foreign partners engaged in projects under international cooperation agreements.

The principal duty of every employee of Toraighyrov University NJSC is the conscientious and high-quality performance of his or her functional duties and compliance with internal regulatory documents and this Code.

Corporate conduct is the internal and external conduct encompassing the wide range of actions related to the management and development of the University's activities. Adherence to the ethical standards adopted in this Code helps to avoid certain risks, contributes to the development of educational and research activities, and enhances the image of education professionals in Kazakhstan.

Business ethics – the ethical norms and principles that underpin business decision-making and shape the business conduct of an organization.

Dress code – the required style and standard of clothing.

Conflict of interest – a situation in which the personal interest of an employee affects or may affect the objective performance of his or her official duties, and in which a contradiction arises or may arise between the personal interest of the employee and the legitimate interests of citizens, organizations, society or the state that is capable of causing harm to those legitimate interests.

Corporate culture – the set of material and spiritual values created by the employees of Toraighyrov University NJSC in the course of their work; the "culture" of the organization, which is reflected in its internal conduct and its external conduct in the market.

Corporate conduct – the internal and external conduct encompassing the wide range of actions related to the activities of the University.

Top management – the Board of Directors, the Chairman and members of the Management Board, and the heads of structural units directly subordinate to the Board of Directors, the Management Board or its members.

Employees – academic staff and administrative and management personnel.

Participants in corporate relations – individuals or organizations having certain interests related to the activities of the University (the Sole Shareholder, employees, clients, the public).

Ethics – the set of norms of conduct.

Standards of conduct imply adherence to the principles of honesty, professionalism, fairness and goodwill in dealings with students and colleagues.

2. GENERAL RULES OF CONDUCT FOR TEACHING STAFF AND EMPLOYEES OF THE UNIVERSITY

2.1 Teaching staff and employees shall:

1) be guided by the principle of legality and by the requirements of the Constitution, laws and other regulatory legal acts of the Republic of Kazakhstan;
2) be committed to the policy and mission of the University and consistently put them into practice, strengthen the overall image of the University through their actions and refrain from any actions capable of discrediting it;
3) perform their official duties conscientiously, impartially and to a high standard, making effective use of their working time for this purpose;
4) not use official information for mercenary or other personal purposes;
5) contribute, through their attitude to work and personal conduct, to a stable and positive moral and psychological climate in the workforce;
6) respect the honour and dignity of every person and citizen regardless of origin, social, official or property status, sex, race, nationality, language, attitude to religion, beliefs, place of residence or any other circumstances;
7) observe generally accepted moral and ethical standards and show respect for the state language and other languages, and for the traditions and customs of the peoples of Kazakhstan;
8) be honest and fair, observe generally accepted moral and ethical standards, be polite and courteous in dealings with colleagues and students, observe business etiquette and respect the rules of official conduct;
9) not subject subordinates to unfounded accusations, rudeness, humiliation, tactlessness or improper conduct;
10) wear business attire while performing their official duties;
11) not use their official position and the opportunities associated with it in personal or public interests, or in the interests of religious associations and other non-profit organizations, including for promoting their own attitude towards them;
12) if unable to come to work (or to join online) on time, notify their line manager or the Director of the HR Service of the University of the problem in advance, or no later than two hours after the start of the working day; in the event of temporary incapacity for work (illness), inform their line manager or the Director of the HR Service of the University that a sick leave certificate has been opened;
13) bear in mind that systematic lateness for work entails disciplinary sanctions and may serve as grounds for the University to discontinue its cooperation with the employee;
14) observe the following norms of business ethics when holding business meetings:

– participants shall arrive at the meeting on time and take their assigned seats in advance; employees who miss meetings or arrive late may be subject to disciplinary sanctions;

– during the meeting, participants shall not hold conversations that distract others or disrupt the meeting, examine unrelated documents or engage in matters not related to the meeting;

15) not demean the honour and dignity of students on any grounds whatsoever, including age, sex, nationality or other characteristics;

16) ensure that the demands made by employees and teaching staff on students are positive and justified;

17) choose methods of working with students that develop their independence, self-discipline, self-improvement and willingness to cooperate with and help others;

18) strive to increase students' motivation to learn and to strengthen their confidence in their own strengths and abilities;

19) assess students' work fairly and objectively;

20) keep confidential any personal information entrusted to them by students, except in cases provided for by the legislation of the Republic of Kazakhstan;

21) not abuse their official position by using students for any services or favours for personal purposes;

22) in the course of teaching, perform their official duties conscientiously and prevent any possible manifestations of corruption;

23) if any element of corruption is detected, immediately report it to their line manager so that those responsible can be held liable;

24) under no circumstances discuss or criticize the personal shortcomings of their colleagues; only the decisions they make and the actions they take may be discussed and criticized, and any criticism of another employee shall be objective and well-founded;

25) show tact, goodwill and restraint when discussing work matters and be able to listen to the other person's arguments;

26) not humiliate or offend the dignity of an employee when making critical remarks to him or her;

27) not let their own negative emotional state affect their relations with colleagues, and give no reason for it to be perceived as disrespect towards them;

28) listen to their subordinates and respond appropriately (in line with the open-door policy); if a line manager is unwilling or unable to listen to a subordinate without a valid reason, the subordinate may file a complaint with higher management;

29) when using social networks and posting comments and statements, use their real name together with a disclaimer stating that the views expressed are personal and do not reflect the position of Toraighyrov University. Before sharing any information about the activities of the University, they shall make sure that such information has already been officially announced by the University and is not

confidential. Disclosure of confidential information about the organization and of information intended for internal use is strictly prohibited. Statements shall not discredit the University's employees, partners or competitors. Any false, misleading, harmful or critical statements about competitors, as well as comparisons of the activities, products and services of Toraighyrov University with those of competitors, are unacceptable. Unfounded criticism of Toraighyrov University is also discouraged.

2.2 Professional ethics

The ethical norms of professional relations are based on universal human norms and rules of conduct. Public criticism of the professional or personal qualities of the University's clients, employees and management, as well as slander and insult, is not permitted. The personal interests of employees shall not influence their relations with the University's partners, counterparties and employees.

In performing official duties, working with clients and resolving disputes, relations shall be built exclusively on an ethical and professional basis.

All employees of the Company are responsible, in accordance with the legislation of the Republic of Kazakhstan, for ensuring that there is no place in the workforce for any form of discrimination that:

– infringes the honour and dignity of the individual;

– creates an atmosphere of intimidation and hostility in the workplace;

– adversely affects an employee's career prospects;

– harms the reputation of the University.

The management of Toraighyrov University NJSC undertakes to take all necessary measures to prevent unacceptable behaviour in the workplace and to resolve conflict situations among employees.

Standards of conduct:

– organizing and conducting classes using new, modern forms of teaching;

– strong motivation for self-development and for developing the services provided within the University's activities;

– providing services to internal and external clients at a high level of quality;

– continuously improving one's professional level and qualifications and developing one's skills and abilities;

– maintaining the image and reputation of a professional.

Every employee shall know the scope of his or her professional activities and carry out the assignments of higher management promptly and to a high standard in accordance with his or her job description.

Creating an environment of continuous learning and development for employees is a key factor in achieving the strategic goals of the University. The University supports the career growth of employees on the basis of alignment between the employee's personal aspirations, the interests of the University and

the available staffing opportunities. The personnel assessment and management system supports a common corporate culture and guarantees equal opportunities.

Employees have the right to professional development both at Toraighyrov University and at other educational institutions in the Republic of Kazakhstan and abroad.

The system of internal training in areas of professional activity comprises:

– corporate training at training centres – internal seminars and training sessions for staff;

– participation in scientific conferences, round tables, symposia, etc.;

– conducting fundamental and applied research.

Employees of the University shall strive to continuously improve their professional qualifications and to develop the knowledge, skills and abilities that may be useful in performing their official duties.

An employee of the University shall not use working time established by the Labour Code of the Republic of Kazakhstan and the internal labour regulations for personal purposes (business activities or other activities not related to the performance of the duties provided for by the employment contract). Official position and working time shall be used solely for the conscientious and proper performance of official duties.

The University has zero tolerance for corruption in any form and will not tolerate conduct whereby employees use their official position to obtain improper and unlawful gain for themselves or their relatives, or encourage such conduct among colleagues.

It is prohibited to demand or accept, directly or indirectly, any remuneration for the services provided.

Employees of the University may not accept gifts, hospitality, favours, services, entertainment or any other offers of material value from persons or organizations that expect them to make any decisions.

Employees are prohibited from directly or indirectly demanding or accepting gifts if they come from a prohibited source or are offered in connection with the employee's official position.

Employees may refer prospective students to study at the University, but may under no circumstances give such students preference over others.

Employees of the University may recommend other persons for employment at the University, but only on general terms, without giving special preference if any of the candidates is a relative or acquaintance.

An employee's appearance is the foundation of professional etiquette and an integral part of the University's corporate culture. A business atmosphere is emphasized and complemented by business attire (business dress code).

Rules for certain categories of employees:

Casual dress (where required by the nature of the work) is permitted for the following units (except for managerial staff):

– the security service, where an appropriate uniform has been approved;

– catering staff, who are subject to separate appearance requirements in accordance with the legislation of the Republic of Kazakhstan;

– administrative and maintenance services.

Holding celebratory events for the University community is one of the important elements in shaping corporate culture.

To strengthen corporate spirit, various creative, music and dance competitions are held in which employees can realize their creative potential. Great importance is attached to the development of physical culture and a healthy lifestyle among employees.

One of the duties of employees is to ensure the safekeeping of the property of Toraighyrov University NJSC (where necessary, under a confidentiality regime) and to treat it with care.

Employees are prohibited from any acts of vandalism, damage or other harm to the property of Toraighyrov University NJSC, including buildings, equipment and furniture, as well as from removing property without special permission.

Members of the University's bodies, employees of the corporate services and employees of the University shall perform their professional functions in good faith and reasonably, in the interests of the Sole Shareholder and the University, avoiding conflicts.

Members of the University's bodies shall not allow conflicts of interest to arise. If a conflict of interest arises, they shall notify the Board of Directors or the Chairman of the Management Board – Rector in advance, record it in writing and refrain from participating in decision-making on the matter.

The Chairman of the Management Board – Rector, the members of the Management Board and the employees of the University's corporate services may hold positions in other organizations only with the approval of the Board of Directors.

The Chairman of the Management Board – Rector may not hold the position of head of the executive body of another legal entity.

Employees of the University's corporate services may not be elected to the Board of Directors or the Management Board of the University, nor may they be members of the bodies of other institutions.

Members of the University's bodies and corporate services shall comply with the rules and norms of the Code of Corporate Governance and shall not participate in the bodies of other legal entities, in order to avoid conflicts of interest.

3. CONFLICTS OF INTEREST AND THEIR RESOLUTION

Corporate conflicts and conflicts of interest may arise as a result of:

1) non-compliance with the legislation of the Republic of Kazakhstan and the requirements of the University's internal documents;

2) decisions by the University's bodies that may lead to a deterioration in the University's financial position and cause it damage;

3) decisions made or actions taken by officials and other employees of the University that are contrary to the interests of the Sole Shareholder and the University;
4) employees having financial or other interests in another legal entity with which the University maintains business relations;
5) business opportunities being given to other legal entities, to the detriment of the interests of the Sole Shareholder and the University, owing to personal property or non-property interests.

3.1 Prevention of corporate conflicts and conflicts of interest

Effective prevention and resolution of corporate conflicts requires, first and foremost, their prompt identification where they have arisen or may arise at the University, and clear coordination of the actions of all the University's bodies in resolving them.

With regard to corporate conflicts, the University adheres to the principle of preventing them from arising and treating them with due attention. When corporate conflicts arise, the University takes a position based on compliance with the law and its internal documents.

In order to prevent corporate conflicts and conflicts of interest, the University and its employees shall:
1) comply with the legislation of the Republic of Kazakhstan, the provisions of the University's Charter and the University's internal regulatory documents;
2) refrain from actions and decisions that may lead to corporate conflicts and conflicts of interest;
3) disclose information on the University's activities in accordance with the legislation of the Republic of Kazakhstan, the Charter and the University's internal regulatory documents;
4) ensure the reliability of the financial statements and other published information provided to the Sole Shareholder, interested parties and regulatory and supervisory authorities;
5) participate in identifying risks and weaknesses in the University's internal control system;
6) observe the principles of corporate ethics;
7) disclose to their line manager full and accurate information about any actual or potential conflict of interest;
8) recuse themselves from considering, and from deciding on, matters in which they have a personal interest;
9) immediately report any existing or potential conflict of interest by submitting a written notification (Appendix 1) to the authorized body or person, namely the University's Compliance Service or the University's Ethics Commissioner.

In order to prevent corporate conflicts and conflicts of interest, officials shall:

1) respect the rights of the Sole Shareholder in accordance with the legislation of the Republic of Kazakhstan, the Charter and the University's internal regulatory documents;
2) provide the Board of Directors / the Sole Shareholder with information on matters that may become the subject of a corporate conflict;
3) not disclose or use, in their own interests or those of third parties, confidential information about the University during their employment and for three years after its termination, unless a longer period is provided for by the University's internal regulatory documents;
4) refrain from actions and avoid situations that lead or may potentially lead to corporate conflicts and conflicts of interest between their own interests and those of the Sole Shareholder and the University, and, should such a conflict arise, immediately inform the Board of Directors;
5) promptly inform the Corporate Secretary of the existence (emergence) of a conflict.

The University ensures the prompt resolution of identified corporate conflicts and conflicts of interest and clear coordination of the actions of its bodies; in particular, it:
1) ensures that corporate conflicts and conflicts of interest are identified at an early stage, including through monitoring;
2) determines its position on the substance of corporate conflicts and conflicts of interest as quickly as possible, takes the appropriate decision and communicates it to the Parties to the conflict.

The procedure for considering corporate conflicts and conflicts of interest is initiated by an Application (appeal, letter or demand) (hereinafter – the Application) from any of the Parties to the conflict, submitted in writing to the University's Compliance Service, the University's Ethics Commissioner or the head of the structural unit concerned, according to their competence.

The Board of Directors resolves corporate conflicts and conflicts of interest on matters within its competence. In such cases, the Corporate Secretary is responsible for informing the Board of Directors of potential and actual corporate conflicts and conflicts of interest and of their substance.

The Board of Directors considers individual corporate conflicts and conflicts of interest falling within the competence of the Chairman of the Management Board – Rector where the subject of the conflict is an action (omission) or decision of the Chairman of the Management Board – Rector or of members of the Management Board, and also where decisions taken by members of the Management Board have not resolved the conflict.

3.2 Procedure for resolving corporate conflicts and conflicts of interest

To ensure the effective resolution of corporate conflicts and conflicts of interest, persons whose interests are or may be affected by the conflict shall not take part in its resolution.

An Application may be refused only if a decision has already been made on the conflict concerned, unless otherwise provided by the legislation of the Republic of Kazakhstan.

The body or official of the Company competent to resolve corporate conflicts and conflicts of interest (the Compliance Service or the Ethics Commissioner) shall, within 10 working days of receiving the Application, invite the Parties to the conflict to appoint a Mediator.

Where a Mediator cannot be appointed within the established time limit, the Board of Directors shall resolve the conflict itself if the matter falls within its competence.

To resolve a corporate conflict that does not fall within the competence of the Board of Directors, the Compliance Service or the Ethics Commissioner may act as Mediator.

Within 5 working days of the Mediator's appointment, the University body or official competent to resolve the conflict shall send the Mediator materials specifying the subject of and Parties to the conflict and the problem (contradiction) underlying it, together with a copy of the Application of the Party to the conflict and the written consent of the Parties to the resolution of the conflict.

Within 5 working days of receiving all the materials, the Mediator shall begin considering the corporate conflict and notify the Parties to the conflict in writing.

Within three working days of notifying the Parties of the decision to consider the corporate conflict, the Mediator shall agree in writing with the Parties to the corporate conflict:

1) the date of the meeting to consider the corporate conflict;

2) their undertaking to comply with the decisions on its resolution adopted by the Parties to the corporate conflict.

This agreement is obtained by receiving the corresponding written confirmation from the Parties (Appendix 2).

Each Party to the conflict may propose to the Mediator its own formulation of the subject of the conflict and of the way to resolve it. The Parties to the conflict shall submit such information to the Mediator within three working days of receiving the Mediator's notification confirming readiness to consider the corporate conflict.

If necessary, the Mediator may request additional explanations from the Parties to the corporate conflict regarding its causes and development. Where the Parties to the corporate conflict have agreed to its consideration by the Mediator, they shall provide the Mediator with all the information he or she requires on the subject of the conflict. In connection with the examination of the conflict, the Mediator may also require the information necessary to reach a decision from the University's bodies, members of those bodies and other employees of the University, who shall in turn provide it to the Mediator within the established time limits.

In the process of resolving a corporate conflict, the Mediator uses questioning, interviews and negotiation. With the consent of the Parties to the conflict, the Mediator may use electronic communication to question the Parties, discuss issues and prepare a draft Agreement, while guaranteeing that the information is not disclosed to third parties.

As part of the preliminary consideration of the corporate conflict, the Mediator prepares proposals and options for its resolution for the Parties to the conflict. The Mediator sends these proposals to the Parties together with a notice of the meeting to consider the corporate conflict, stating its place and time.

At the request of the Parties to the conflict or on his or her own initiative, the Mediator may invite other persons (experts, etc.) to the meeting at which the corporate conflict is considered. The Mediator determines the final list of invitees independently. Witnesses who are officials or employees of the University shall attend the meeting when summoned by the Mediator.

No later than 5 working days before the meeting at which the corporate conflict is to be considered, unless a later date is agreed by the Parties to the conflict, the Mediator shall familiarize the Parties to the conflict with the materials at his or her disposal.

Corporate conflicts are considered and decisions on their resolution are taken at meetings organized and conducted by the Mediator. The Parties to the corporate conflict and other persons designated by the Mediator are invited to the meetings.

The Mediator ensures that minutes are kept at all meetings. The minutes are signed by the Mediator and the Parties to the conflict. Where necessary, a verbatim record of the meetings may be kept by decision of the Mediator.

The Parties to the corporate conflict and their representatives present at the meetings have rights, including the right to sign the Agreement. In the consideration of corporate conflicts, all Parties to the conflict enjoy equal rights. Presenting evidence in support of its position is a right of each Party to the corporate conflict; however, an unjustified refusal by a Party to present evidence may be regarded by the Mediator as an act of bad faith.

The Mediator assists the Parties to the corporate conflict in formulating an agreed subject of the conflict on the basis of the formulations they have submitted, and assists in developing mutually acceptable wording for the Agreement.

Based on the results of the consideration of the corporate conflict, the Mediator may prepare recommendations for its resolution and submit them to the Parties to the corporate conflict. The final decision is taken by the Parties to the conflict and is recorded in the relevant minutes and in the Agreement.

An Agreement on the resolution of a corporate conflict is deemed adopted if it is:

1) made in writing;

2) signed by the Parties to the corporate conflict and the Mediator.

Implementation of the Agreement adopted by the Parties to the corporate conflict is monitored by the Mediator, by the Party (Parties) to the corporate conflict or by the relevant body of the University, as provided for in the Agreement.

Within three working days of the signing of the Agreement by the Parties to the corporate conflict, the Mediator sends copies of it to the Parties.

If the Agreement is not signed by the Parties to the corporate conflict, the Mediator may decide to terminate or continue the mediation procedure and shall notify the Parties to the corporate conflict, as well as the University body or official competent to resolve the corporate conflict, of that decision and the reasons for it.

The Mediator may refer to the University body or official competent to resolve the corporate conflict the question of whether its consideration is advisable, and may decline to consider the corporate conflict.

In cases requiring the resolution of issues raised in the appeal, an additional review, the request of additional materials or other measures, the time limits set by this Code for considering and deciding on the resolution of a corporate conflict may be extended, with notice to the Parties to the corporate conflict and to the University body or official competent to resolve it.

Upon resolution of the corporate conflict, the Mediator transfers all materials (letters, correspondence, including by e-mail, minutes, verbatim records, powers of attorney, petitions, appeals, applications, notices, etc.) to the University archive for storage.

The main task of the University’s bodies in resolving a corporate conflict is to find a solution that does not contradict the legislation of the Republic of Kazakhstan, the Code of Corporate Governance, the Charter or the University’s internal regulatory documents and that serves the interests of the Sole Shareholder and the University.

The University’s bodies, within their competence, monitor, facilitate and are responsible for the implementation of Agreements signed by the Parties to the corporate conflict.

Where a corporate conflict has not been resolved with the help of the Mediator under the procedures of this Code at the level of the Compliance Service, the Ethics Commissioner or the University’s bodies, the matter shall be referred to the Board of Directors of the University. In that case, the Corporate Secretary shall inform the Board of Directors of the substance of the conflict. If the Corporate Secretary is one of the Parties to the conflict or has a conflict of interest, the functions of Mediator may, by decision of the Board of Directors, be performed by an authorized committee of the Board of Directors, provided that this does not contradict the legislation of the Republic of Kazakhstan, the University’s internal regulatory documents or this Code.

3.3 Procedure for resolving conflicts of interest

Employees shall not allow situations in which a conflict of interest may arise, either with respect to themselves (or persons related to them) or with respect to others.

Employees of the University are responsible for situations that give rise to a conflict of interest.

Employees of the University shall not use their official position to obtain personal benefit or to assist members of their families or close acquaintances. Such conduct is considered unacceptable and discredits the honour and dignity of a University employee.

Responsibility for resolving a conflict of interest lies primarily with the employee. Full disclosure of the relevant information is an important step for the person concerned.

Employees of the University shall:

1) be guided by the interests of the institution, without regard to their personal interests, when making business decisions and performing their duties;
2) avoid situations and circumstances that may lead to a conflict of interest;
3) assist in resolving any conflict of interest that has arisen;
4) disclose any actual or potential conflict of interest;
5) assist in the disclosure of any conflict of interest that has arisen.

An employee of the University in respect of whom a dispute concerning a conflict of interest has arisen may submit a written application to the official responsible for preventing corruption and other offences whose functional duties include receiving employees' enquiries on determining whether such a conflict exists (the University's Compliance Service or the Ethics Commissioner).

An employee of the University who has information about a conflict of interest shall submit an Application to his or her line manager or apply to the official responsible for preventing corruption and other offences whose functional duties include receiving employees' enquiries on determining whether such a conflict exists (the University's Compliance Service or the Ethics Commissioner).

After the Application has been submitted, the employee of the University shall be released from the task (decision on the matter) that gave rise to the conflict of interest.

Information about a conflict of interest that at any stage affects or may affect persons elected or appointed, or recommended for election or appointment, by the Board of Directors shall be submitted to the Board of Directors within three working days for a decision on how the conflict of interest is to be resolved.

The University guarantees the confidentiality of the information submitted by employees for the purpose of disclosing and resolving conflicts of interest. The responsible persons of the University involved in the procedure for disclosing and resolving conflicts of interest bear personal liability for disclosing in-

formation that has become known to them in connection with these actions. An employee of the University shall report in writing to the University's Compliance Service any pre-conflict situation (the emergence of a personal interest that may lead to a conflict of interest) and (or) any conflict of interest that has arisen.

The University's Compliance Service is responsible for receiving information about emerging (existing) conflicts of interest.

4. FINAL PROVISIONS

To create a distinctive working environment characterized by mutual respect and a highly professional attitude to one's own work, instructions must be carried out accurately and on time.

Employees of the University, regardless of their position, shall contribute, through their attitude to work and personal conduct, to a stable and positive moral and psychological climate in the workforce; shall not allow staff to be selected on the basis of regional affiliation or personal loyalty; shall prevent and stop breaches of the norms of professional ethics by colleagues; and shall approach management in the established manner on matters of official, academic and public activity, as well as on personal matters, provided that this does not contradict the general norms of ethics.

Responsibility reflects a high level of skill, professionalism, fairness, honesty and trust.

Employees of the University equally share in the Company's successes and achievements, and together experience the difficulties that provide invaluable experience and encourage them to strive for self-development. Every member of the University community should therefore take responsibility for his or her work and strive for professional excellence in everything.

Standards of conduct:

– every decision is taken on the basis of careful analysis and contributes to achieving the strategic goals of the University;

– tasks are carried out accurately and on time;

– the response to changing conditions and challenges is rapid.

Every employee of the University, regardless of his or her official status and position, shares responsibility for providing high-quality educational services, and every decision taken is based on a shared commitment to the University's Mission. The professional performance of the educational, supervisory, executive and teaching functions assigned to an employee will improve the quality of the services provided.

One of the important functions of employees in educational activities is to provide up-to-date, relevant, comprehensive and open information. All information shall be accurate, complete and objective.

The Code of Corporate Ethics reflects the norms and rules that the University's employees apply in their daily lives. The Code is the result of painstaking work, regular meetings and discussions.

Sharing the norms of corporate ethics and the standards of conduct enshrined in the Code will enable the University community to achieve its strategic goal and become the best among the country's leading universities.

The core values of the University are Honesty, Trust, Fairness and Shared Responsibility for the work of every employee of the Company. The University's values, shared by its employees, build trust and unite the organization into a single whole.

The goal of Toraighyrov University NJSC is to develop an innovative digital university as a leading academic and research centre of the country.

The mission of the University is to develop human capital and to contribute to the formation of outstanding, socially responsible professionals of the digital age who are well-rounded, harmonious individuals.

The University's management sets ambitious strategic goals for its employees, and the responsibility of every employee accelerates the Company's success.

This Code enters into force upon its approval at a meeting of the Board of Directors and remains in force until a new Code is adopted.

Amendments and additions may be made to the Code in the established manner.

Appendix 1

To _____
(position, full name)

From _____
(position, full name, contact telephone number)

NOTIFICATION
of an existing or emerging conflict of interest

In accordance with the requirements of the Code of Corporate Ethics of Toraighyrov University NJSC, I hereby report a conflict of interest situation that leads or may lead to the improper performance of my duties: in the performance of my official duties, I have a personal interest that leads or may lead to a conflict of interest.

1. Circumstances giving rise to the conflict situation (personal interest):

_____

_____
(describe the situation in which a conflict of interest has arisen or may arise, with detailed justification)

2. Official duties whose performance is or may be affected by the personal interest:

_____

_____
(list the specific official duties)

3. Measures taken (proposed) to prevent or resolve the conflict of interest:

_____

_____
(state what measures the employee has taken or proposes to take to prevent or resolve the conflict of interest)

4. List of documents confirming the existence or emergence of the conflict of interest and the measures taken (proposed) to prevent and resolve it:

1) _____

2) _____

Person submitting the notification:

_____ «____» _____ 20__

Person receiving the notification:

_____ «____» _____ 20__

Appendix 2

To (organization) _____

To (person) _____

_____

LETTER OF CONFIRMATION No. _____

I confirm my participation in the meeting _____ (date, time) to consider the corporate conflict

_____

_____

_____

_____

I undertake to comply, in a timely and proper manner, with all decisions on its resolution adopted by the Parties to the corporate conflict.

Full name _____

Position _____

Signature _____

Date _____