

«META University»
Jaýapkershiligi shekteýli
seriktestigi



Limited Liability Partnership
«META University»

APPROVED by
the Decree of the President
META University
No. 3 dated December 8, 2025

**ANTI-DISCRIMINATION, HARASSMENT AND EQUAL OPPORTUNITY
POLICY**
First edition

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CONTENTS

1.	General Provisions	3
2.	Regulatory grounds	3
3.	Purpose and objectives of the Policy	4
4.	Basic concepts and their practical application	4
5.	Principles of implementation of the Policy	4
6.	Prohibited Behaviors	5
7.	Responsibilities of the University	5
8.	Responsibilities of employees	5
9.	Complaint Mechanisms	5
10.	Review and investigation procedure	6
11.	Protection of complainants and witnesses	6
12.	Monitoring and development	6
13.	Final provisions	7



I. General Provisions

1. META University LLP (hereinafter referred to as the University), implementing the principles of sustainable development and modern approaches to corporate governance, is aware of its institutional responsibility to society, the state and the international academic community for the formation of a fair, inclusive and safe educational and working environment.

The university considers ensuring equal opportunities, non-discrimination and respect for human rights as an integral part of its ESG strategy (Environmental, Social, Governance), as well as the most important condition for sustainable development and improving the quality of education.

2. In its activities, the University is guided by the best international practices and standards, including the approaches of QS Quacquarelli Symonds, as well as the principles of social responsibility, transparency and accountability.

3. This Policy is aimed at developing a systematic and institutional approach to the prevention of **discrimination, harassment, bullying, mobbing** and other forms of unacceptable behavior, ensuring the protection of the rights and dignity of all participants in the educational and labor process.

4. The formation of an inclusive environment is a strategic priority of the University and is aimed at creating conditions under which every employee and student can realize their potential without the risk of discrimination or pressure.

5. The policy applies to:

- employees (including management);
- students;
- temporary assistance;
- contractors and partners;
- other persons located on the territory of the University.

6. The implementation of this Policy is ensured, among other things, through the activities of the compliance service, which acts as an independent element of the control system.

II. Regulatory grounds

1. The Policy has been developed in accordance with:

- Constitution of the Republic of Kazakhstan;
- Labor Code of the Republic of Kazakhstan;
- the Law "On Education";
- international human rights standards;
- ESG approaches and methodologies of QS Quacquarelli Symonds.

2. The University applies the principles of non-discrimination enshrined in international practice, regardless of the requirements of minimum national standards.



III. Purpose and objectives of the Policy


1. The goal is to create an environment in which discrimination, pressure and unequal treatment are excluded.
2. To achieve the goal, the University:
 - forms a culture of respect and ethical behavior;
 - implements systematic mechanisms for preventing violations;
 - ensures the protection of the rights of all participants;
 - implements transparent procedures for considering appeals;
 - monitors and analyses risks.

IV. Basic concepts and their practical application

1. **Discrimination** is considered to be any action or decision resulting in unequal treatment in recruitment, pay, promotion or training.
2. **Harassment** includes:
 - verbal (insults, derogatory statements);
 - non-verbal (gestures, ignorance, pressure);
 - physical forms.
3. **Bullying and mobbing** manifest themselves in systematic psychological influence aimed at humiliating, isolating or displacing an employee.
4. **Sexual harassment** includes any unwanted sexual activity, including innuendo, suggestions, physical contact.
5. **An inclusive environment** implies not only the absence of discrimination, but also the active creation of equal conditions.

V. Principles of implementation of the Policy

1. The University implements the Policy on the basis of the following principles:
 - 1) Zero Tolerance
Any violation is considered unacceptable regardless of the position of the violator.
 - 2) Preventive approach
The focus is on prevention, not just response.
 - 3) Confidentiality
All appeals are considered with the protection of personal data.
 - 4) Independence
Consideration is provided with the participation of the compliance service.
 - 5) Protection of applicants
Any harassment is excluded.
 - 6) Objectivity

	Limited Liability Partnership «META University»	Page. 5 of 7
	<i>Anti-discrimination, anti-harassment and equal opportunity policy</i>	

Decisions are made based on facts.

VI. Prohibited forms of behavior.

The University prohibits:

- any form of discrimination;
- unequal pay without objective reasons;
- refusal to promote on discriminatory grounds;
- pressure from management;
- humiliation of dignity;
- Distribution of offensive material;
- sexual harassment;
- abuse of office.

VII. Responsibilities of the University

University:

- implements the policy of equal opportunities in HR processes;
- conducts regular training of employees;
- provides access to protection mechanisms;
- monitors the corporate environment;
- ensures the functioning of the compliance service as a key element of control;
- analyzes the causes of violations and implements corrective measures.

VIII. Responsibilities of employees

Employees are obliged to:

- comply with ethical standards;
- refrain from discriminatory behaviour;
- respect colleagues;
- report violations;
- facilitate investigations.

IX. Complaint Mechanisms

The university provides a multi-level system:

- HR;
 - leadership;
 - compliance service;
 - **anonymous channels.**
2. Any person has the right to file a complaint without risk of negative consequences.

X. Review and investigation procedure

Consideration includes:

- 1) registration;
- 2) initial assessment;
- 3) investigation;
- 4) decision-making;
- 5) control of execution.

Compliance service:

- coordinates the process;
- ensures independence;
- conducts inspections;
- forms a conclusion.

Measures of influence depending on the severity:

- warning;
- disciplinary sanction;
- dismissal;
- transfer of materials to the authorities.

XI. Protection of complainants and witnesses

The University guarantees:

- protection from pressure;
 - confidentiality;
 - prevention of repression.
1. Control is carried out by the compliance service.

The role of the compliance service

Compliance Service:

- monitors compliance with the Policy;
- analyzes risks;
- conducts investigations;
- advises employees;
- organizes training;
- generates reports;
- participates in ESG governance.

XII. Monitoring and development

The University regularly:

- evaluates the level of employee satisfaction;
- analyses complaints;
- improves the Policy.



XIII. Final provisions

1. The Policy comes into force from the moment of approval.
2. Reviewed at least 1 time in 3 years.
3. Implemented in conjunction with the Regulation on the Compliance Service.