

«META University»
Jaýapkershiligi shekteýli
seriktestigi



Limited Liability Partnership
«META University»

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


CODE OF CORPORATE ETHICS
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I. BASICS OF THE CODE

1. Codex Mission

1.1. The Code of Corporate Ethics (hereinafter referred to as the Code) of META UNIVERSITY LLP (hereinafter referred to as the University) is a management and value document aimed at forming a common understanding of the norms of business ethics and professional behavior, ensuring effective interaction between all members of the university community.

1.2. Work at the University involves high performance of activities, focus on quality, responsibility and strengthening the reputation of an educational organization. The most important qualities of an employee are readiness for changes due to the requirements of the time, the ability to initiative, creative thinking and professional growth.

1.3. When solving problems of any level, initiative, generation of ideas aimed at optimizing processes and improving the quality of the educational product are encouraged.

1.4. In the event of disputable and difficult situations, the University employees are primarily guided by the principles and norms of this Code, as well as the norms of the legislation of the Republic of Kazakhstan and other internal regulatory documents of the University.

2. General Provisions


2.1. This Code of Corporate Ethics is an internal regulatory act of the University and defines the mandatory norms of individual and collective behavior of all employees who are in labor relations with the University.

2.2. . The Code establishes key values, norms of behavior and principles of interaction between all members of the university community: faculty, administrative and managerial staff, other employees, students and partners of the University.

2.3. . The Code was developed in accordance with the Constitution of the Republic of Kazakhstan, the Labor Code of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On Education", "On Science", the Concept of Anti-Corruption Policy of the Republic of Kazakhstan, as well as on the basis of generally accepted moral and ethical standards.

2.4. The Code is approved by the order of the head of the University and comes into force from the moment of its approval.

2.5. The Code is uniform and mandatory for the entire staff of the University, regardless of their position and status.

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3. Concepts and definitions

3.1. Within the framework of this Code, the following concepts and definitions are used:


- ✓ Employer – President;
- ✓ University Administration - Rector, Vice-Rectors;
- ✓ Administrative and managerial personnel - heads of structural subdivisions, employees of structural subdivisions;
- ✓ Faculty - Deans of Schools, Professors, Research Professors, Associate Professors, Senior Lecturers, Lecturers;
- ✓ Employees are individuals who are in labor relations with the employer and directly perform work under an employment contract;
- ✓ Students - students, undergraduates, doctoral students, listeners and other categories of persons studying at the University in accordance with the legislation of the Republic of Kazakhstan;
- ✓ Ethics is a set of norms of behavior;
- ✓ Corporate ethics is a set of ethical principles and norms of business communication that all employees of the University 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, which guide the University staff;
- ✓ Conflict of interest is a situation in which there is a contradiction between the interest of an employee of the University in obtaining material or personal benefits and the rights and legitimate interests of Students, citizens, organizations, society or the state, which may affect the proper performance of official duties by an employee of the University.
- ✓ Business etiquette is a procedure for the behavior of employees, including a system of regulated rules of conduct in various business situations, including business correspondence, business communication, hiring, addressing management, which is distinguished by formality, restraint and accuracy.

4. Principles of corporate ethics

4.1. The University is guided by the following principles of corporate ethics:

4.1.1. Respect

Respect **is** a friendly attitude towards workers, students and veterans.

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4.1.2. Integrity

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

4.1.3. Honesty and objectivity

All management decisions and actions of the University Employees are characterized by honesty, openness and objectivity. A biased attitude towards both one's job duties and colleagues is not allowed.

The university does not allow a conflict between personal interests and professional activities; Deception, concealment and false statements are incompatible with the status of a university employee.

4.1.4. Image and reputation

Managerial decisions and actions of Employees must be consistent with the goals of maintaining a positive image of the University. Employees make efforts to prevent situations where their actions may adversely affect the business reputation of the University.

4.1.5. Transparency

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

4.1.6. Professionalism

Deep knowledge of the subject of their activities, responsible and conscientious attitude to official duties, high-quality and timely performance of tasks, improvement of the professional level.

4.1.7. Responsibility

Responsible fulfillment of their obligations to managers, employees, teachers, students, colleagues, state and municipal authorities, and other stakeholders; Responsibility is a reflection of a high level of skill, professionalism, fairness, honesty and trust.

4.1.8. Cleanliness

Cleanliness implies moral purity, inability to commit an immoral act, decency.


4.1.9. Tolerance

Tolerance is based on tolerance and respect for other ideas, alien views, concepts, tastes.

Efficiency

Achieving maximum results under the condition of optimal use of human, intellectual, material and financial resources.

Innovation

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Development and implementation of scientific research and technologies both in the educational process and in various areas of the socio-economic structure and socio-cultural development of modern Kazakhstan.

Respect for boundaries

The employee must consider the personal boundaries of colleagues and avoid interfering in the personal life of colleagues without permission. Respect for personal space, past experiences and opinions lays the foundation for trusting relationships.

Cooperation and mutual assistance

Team members are ready to support each other in both professional and personal matters. This can manifest itself in a desire to help with tasks, as well as emotional support in difficult moments.

Continuity

Continuity – respect for the work and experience of older generations, communication between beginners and veterans of labor and mentoring.

Caring for Veterans

Respect for the older generation, recognition of its merits, preservation and multiplication of traditions, honoring and encouraging honored workers of the Academy.

Labor motivation

The University strives to create an effective system of material and non-material remuneration for employees.

II. ETHICAL NORMS OF BEHAVIOR WITHIN THE UNIVERSITY

5. Business etiquette

5.1. General principles


5.1.1. Employees of the University are required to comply with the Charter, Internal Labor Regulations, local regulations and labor discipline requirements.

5.1.2. Each Employee is obliged to conscientiously follow the principles of this Code, comply with the terms of the employment contract, job descriptions and other internal documents of the University, being aware of personal responsibility for their violation.

5.1.3. Compliance with the norms of this Code is mandatory for all Employees of the University, regardless of their position and position.

5.1.4. Employees are required to comply with the established requirements for the security regime and work with confidential information in accordance with the internal documents of the University.

5.1.5. In case of questions regarding the application of the provisions of this Code or doubts about the correctness of his/her actions, the Employee has the right to contact his/her immediate supervisor or the HR department.

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5.1.6. The University encourages Employees who strive for self-education and professional development, and creates equal conditions for advanced training in accordance with internal regulatory documents.

5.1.7. Employees are required to comply with the established working hours and the rules of access to the University buildings, including the access control system, in the manner prescribed by internal acts.

5.2. **Relationships between managers and subordinates**

5.2.1. Relations between managers and subordinates are based on the principles of mutual respect, trust, responsibility, transparency and compliance with official subordination.

5.2.2. The role of the leader

Supervisor:

- is an example of professional and ethical behavior;
- Ensures that tasks are clearly defined and that the workload is distributed fairly;
- provides feedback, professional development support and mentoring;
- contributes to the formation of a favorable moral and psychological climate in the team.

5.2.3. The role of a subordinate

Subordinate:

- shows responsibility, diligence and initiative;
- observes official subordination and norms of business communication;
- respects the decisions of the manager and timely informs about emerging difficulties or proposals.

5.3. Communication and feedback

5.3.1. The University maintains a culture of open and constructive communication.

5.3.2. Managers ensure that work issues are available for discussion and that regular meetings are held.

5.3.3. Two-way feedback is welcome, provided that the correct form and business style of communication are observed.

5.3.4. All forms of communication (oral, written, electronic) must comply with the norms of business etiquette and contribute to effective interaction.

6. **Ethics of Meetings and Meetings**

6.1. General requirements

6.1.1. Workshops, meetings and negotiations are held at predetermined times. Timely presence at such events is the responsibility of the University Staff.



6.1.2. If it is impossible to participate in the planned event, the Employee is obliged to notify the immediate supervisor and other interested parties in advance.

6.1.3. During training sessions, meetings and other official events, the use of mobile phones is not allowed; Sound signals must be turned off.

6.2. Event Code of Conduct

6.2.1. When holding meetings, ceremonial meetings, business meetings and other events, Employees are obliged to:

- show respect for the speakers;
- observe silence, order and business style of behavior;
- leave the hall only during breaks or when it is objectively necessary.

6.3. Rules of business etiquette for meetings

6.3.1. Employees are recommended to comply with the following standards:

- to come to meetings and conferences on time;
- familiarize themselves with the agenda in advance and have the necessary materials;
- during meetings, do not conduct telephone conversations, do not be distracted by extraneous affairs and documents;
- if it is necessary to leave the hall, apologize correctly;
- do not use meetings and conferences to resolve personal matters;
- comply with the established rules of the event.

7. **Ethical principles of decision-making and interaction**

7.1. Managerial decision-making


7.1.1. Decision-making by the University's management is based on the principles of transparency, reasonableness and fairness;

7.1.2. Discrimination on the grounds of sex, age, race, nationality, religion, political views and other grounds is not allowed;

7.1.3. Employees in the performance of their duties should be guided by the interests of the University, and not by personal gain or personal relationships.

7.1.4. Employees are obliged to avoid situations in which a conflict of interest may arise, both in relation to themselves and persons related to them.

7.1.5. Heads of structural subdivisions are obliged to make decisions in accordance with the requirements of this Code, demonstrate by personal example adherence to its principles, promote the development of team interaction, mentoring and professional growth of employees.

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7.2. Situations related to possible violation of the rights of employees are considered in accordance with the legislation of the Republic of Kazakhstan and internal documents of the University.

7.3. Principles of relationships in the team

7.3.1. Relations between the employees of the University are built on the principles of mutual respect, trust, goodwill, honesty and impartiality.


7.4. Employee Standards of Conduct

7.4.1. Employees are prohibited from:

- damage the business reputation of the University and its employees;
- disclose confidential information in violation of the terms of a signed non-disclosure agreement;
- allow rudeness, elevated tone, sarcasm, humiliation of honor and dignity;
- commit unethical actions that cause moral or material damage;
- show aggression, neglect, demonstrate a negative emotional state;
- discuss the salary, personal or professional qualities of colleagues in their absence;
- abuse of official position, use it for personal interests or in the interests of third parties;
- to disseminate false information or to use official information illegally.

7.4.2. Employees are obliged to:

- comply with the principles of academic integrity in accordance with the Code of Academic Integrity of the University;
- to promote a positive and ethical working environment;
- be open to constructive professional dialogue;
- provide assistance to colleagues within their powers;
- take the initiative and make proposals to improve the University's activities;
- to observe punctuality, conscientiously and timely fulfill the obligations assumed;
- rational use of working time and resources;
- provide reliable information for official purposes in compliance with confidentiality requirements;
- observe a respectful and constructive tone of business communication;
- comply with official subordination, the principles of teamwork and mutual assistance, resolve conflict situations in a constructive form, if necessary - with the participation of management or a Compliance Officer;
- to respond promptly to changes in the conditions and tasks of professional activity.
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7.5. Responsibility for the result

7.5.1. Each employee of the University, regardless of their position, is responsible for the quality of educational services and the results of their professional activities.

8. Anti-corruption

8.1. Anti-corruption issues at the University are regulated by the Anti-Corruption Policy of META University LLP. The University adheres to the principle of zero tolerance for corruption and carries out activities in accordance with the Anti-Corruption Policy approved by the University.

8.2. Employees of the University are prohibited from directly or indirectly demanding, accepting or offering remuneration, gifts, services or other benefits in connection with the performance of official duties, except as provided for by the legislation of the Republic of Kazakhstan.

8.3. Employees are obliged to counteract any manifestations of corruption, including on the part of employees, teachers and students, and immediately inform about known facts of corruption offenses in accordance with the established procedure.

8.4. Violation of anti-corruption requirements entails liability in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the University.

8.5. Use of official position

8.5.1. Employees of the University are prohibited from using their official position for personal interests or in the interests of third parties, including receiving gifts, services, advantages, discounts or other benefits from counterparties, partners or other interested parties.

8.5.2. In case of receiving a gift or service that cannot be refused without prejudice to the business interests of the University, the Employee is obliged to notify the immediate supervisor in accordance with the established procedure.


9. Prevention and resolution of conflict situations

9.1. The provisions of this section shall be applied in furtherance of the requirements of Items 11-12 of this Code and are aimed at preventing and resolving conflicts of interest and other conflict situations.

9.2. The University encourages the prevention of conflict situations and their resolution through constructive dialogue and negotiation at the earliest possible stage.

9.3. Conflict situations should be resolved as soon as possible and, if possible, at the level at which they arose, minimizing damage to the activities of the University.

9.4. In the event of conflicts with external organizations, Employees are obliged to act in the interests of the University, employees and students, observing the requirements of the legislation of the Republic of Kazakhstan and this Code.

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9.5. Employees are obliged to refrain from involvement in conflict situations that may damage their business reputation or the reputation of the University.

9.6. In the event of a conflict situation or threat of a conflict, the Employee shall:

- notify the immediate supervisor;
- act strictly within the framework of his/her job duties and professional ethics;
- refuse to receive any improper benefit;
- Take measures to prevent the negative consequences of the conflict.

9.7. An employee in respect of whom a dispute has arisen about the existence of a conflict of interest has the right to apply to the official responsible for the prevention of corruption and other offenses (Compliance Officer of the University) with a written request.

9.8. Heads of structural subdivisions are obliged to take measures to create and maintain effective procedures for preventing and resolving conflict situations.

III. EXTERNAL RELATIONS AND REPUTATION

10. Ethics of Relations with Business Partners

10.1. The University values its business reputation and builds stable, trusting and long-term relationships with business partners and other stakeholders.

10.2. Relations with business partners are based on the principles of mutual respect, good faith, responsibility, openness and transparency.

10.3. The University complies with the terms of the concluded agreements (contracts) and conscientiously fulfills its obligations.


10.4. The University ensures timely and objective consideration of appeals, proposals and claims of partners; In the event of disagreements, priority is given to negotiations and the search for mutually acceptable solutions.

11. Ethics of Relations with the Public, External Structures and the Mass Media

11.1. . General principles

11.1.1. In addition to the ethics of relations with business partners, the University builds responsible and transparent interaction with the public, external structures and the media

11.1.2. The university considers itself as an integral part of the social environment, is aware of its social responsibility to society and strives to serve the interests of the development of education, science and enlightenment.

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11.1.3. The University builds constructive relations with state, public, non-governmental and other organizations, as well as partners, for the purpose of sustainable development, health protection, occupational safety and minimization of negative impact on the environment.

11.2. Public Statements and Social Media

11.2.1. When using social networks and other public platforms, employees of the University are required to comply with the norms of business and professional ethics.

11.2.2. When expressing personal opinions in the public space, it is recommended to use your real name and indicate a disclaimer that the views expressed are personal and do not reflect the official position of the University.

11.2.3. Employees must refrain from statements that may cause reputational damage to the University, its partners and competitors.

11.2.4. False, misleading or harmful statements, as well as incorrect comparisons of the University's activities and services with competitors are unacceptable.

11.3. Dissemination of information and interaction with the media

11.3.1. Dissemination of information about the activities of the University is allowed only if it is official and not confidential.

11.3.2. Employees of the University have the right to provide information to the media only on behalf or with the permission of the management or within the limits of the powers granted.

11.3.3. Employees of the University must not speak in public, give interviews, publish materials or make statements on behalf of the University without a corresponding assignment.

11.3.4. When interacting with the media, Employees are personally responsible for the accuracy of the information provided and compliance with the norms of professional ethics.


11.4. Confidentiality and liability

11.4.1. Employees of the University are prohibited from disclosing confidential, official, commercial and other information protected by law, except as provided for by the legislation of the Republic of Kazakhstan. Obligations on non-disclosure of confidential information are determined by *the Non-Disclosure Agreement* and other internal documents of the University.

11.4.2. The use of official information for personal purposes is not allowed.

11.5. Business correspondence and feedback

11.5.1. Business correspondence is an element of the University's business reputation and should contribute to effective and constructive interaction.

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11.5.2. When conducting business correspondence, Employees are obliged to observe:

- mutual respect and correct tone of communication;
- attention to the business interests of the addressee;
- punctuality in the exchange of information and compliance with deadlines;
- clear indication of the subject of the letter and correct addressing ("To", "Copy");
- structure, conciseness and clarity of presentation;
- saving the history of correspondence when forwarding messages;
- compliance with confidentiality and official subordination;
- Indication of the contact information of the contractor.

11.5.3. Employees are obliged to respond in a timely manner to incoming letters and requests; Leaving appeals unanswered is not allowed. Ethics of Public Relations.

IV. CORPORATE CULTURE AND WORKING ENVIRONMENT

12. Appearance and business style of clothing

12.1. The appearance of the Employee is an element of official etiquette and an integral part of the corporate culture of the University.

12.2. The appearance of Employees must comply with the corporate dress code and the nature of the duties performed.

12.2.1. Official events:

- When holding official events (official meetings, meetings, meetings, conferences, graduation thesis defenses and other official events), Employees are required to adhere to a strict business style:


- for men – suit, trousers, shirt, tie, classic shoes;
- for women – clothes of classic or business style (dresses, skirts, pantsuits, blouses, jackets, vests).

12.2.2. Daily service activities:

- In the absence of official events and contacts with external contractors, Employees are recommended to adhere to a moderate business style corresponding to the status of an educational organization:

- clothes should be neat, neat, restrained in color and style;
- black or dark blue jeans of a classic cut are allowed (without scuffs, decorative elements and damage);
- Sports style, excessively bright accessories, revealing, transparent or provocative clothes, rough shoes are not allowed.

12.2.3. Corporate and cultural elements:

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- on Wednesdays, wearing clothes with elements of the national style is encouraged;

- On Fridays, it is allowed to wear clothes with the corporate symbols of the University (T-shirts), sweatshirts and other elements of branded clothing).

12.2.4. Special conditions:

Deviation from the requirements of the business style is allowed:

- for pregnant women;
- for employees for health reasons;

12.2.5. Specifics of departments

- For employees of departments that ensure the operation of buildings, engineering systems and equipment, a less formal style of clothing is allowed, corresponding to the specifics of the tasks performed and labor protection requirements.

12.2.6. Medical personnel.

Medical personnel use the established professional uniform (medical gown or pantsuit) of white, blue, blue, green or other shades allowed by sanitary standards. Clothing must be clean, neat and meet sanitary and hygienic requirements.

12.2.7. Additional requirements

Men are not allowed to be in office premises in hats, except in cases provided for by the state of health or official necessity.

13. Corporate events and events

13.1. General Provisions

Holding corporate holidays and events is an important element in the formation of corporate culture, strengthening team spirit, continuity of generations and the development of internal communications at the University.

Corporate events are held by the decision of the University management on the territory of the University and/or outside it.

13.2. Employee participation


13.2.1. Employees of the University are recommended, if possible, to participate in corporate celebrations and celebrations in order to support colleagues, strengthen team interaction and develop corporate solidarity.

13.2.2. When organizing and holding corporate events, Employees are required to comply with the norms of business and professional ethics, internal labor regulations and safety requirements.

13.3. List of Main Corporate Events

The University traditionally holds the following corporate and university-wide events:

1) Day of the Elderly and Teacher's Day (October 5), with the invitation of veterans of the University;

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- 2) Event dedicated to the Republic Day;
- 3) Event dedicated to the Independence Day of the Republic of Kazakhstan;
- 4) New Year's corporate evening;
- 5) International Women's Day event – 8 March;
- 6) Celebration of "Nauryz Meiramy";
- 7) An event dedicated to the end of the academic year (including field formats);
- 8) Solemn event "Dedication to students";
- 9) Graduation Party;
- 10) Solemn ceremony of awarding diplomas to graduates;
- 11) Other corporate, cultural and social events held by the decision of the University management.

V. SPECIAL OBLIGATIONS AND RESPONSIBILITIES

14. Use of material, electronic and information resources of the University

14.1. Employees of the University are obliged to use material, informational, electronic and other resources of the University for official purposes and in accordance with this Code and local regulations.

14.2. The information resources of the University include data and materials placed in information systems, databases, corporate networks, servers, electronic media, official web resources and information platforms of the University.

14.3. The use of Internet resources, e-mail, instant messengers, chats and other online services is allowed solely for official purposes.

14.4. Internal official interaction is carried out mainly through the approved corporate communication channels and digital platforms of the University.

14.5. Access to information resources is carried out using personal credentials. The transfer of logins, passwords and access codes to third parties, as well as the use of other people's accounts, is prohibited.

14.6. It is prohibited to post materials on the information resources of the University that contradict the legislation of the Republic of Kazakhstan, the norms of business and professional ethics, as well as damage the business reputation of the University or violate the rights and dignity of other persons.

14.7. All resources of the University are provided to Employees solely for the performance of their job duties. Improper, irrational use of resources or causing damage to them entails liability in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the University.

4.15. Rules for the use of material, electronic and other resources of the university

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



15.1. The University respects the right of Employees to participate in the activities of political, religious and public organizations outside of working hours. Personal beliefs of Employees should not interfere with the performance of their job duties and professional interaction.

15.2. When participating in political, religious or social activities, the Employees act exclusively as individuals and are not entitled to refer to the University.

15.3. The use of the resources, name, image and reputation of the University in political, religious and social activities is not allowed.

16. Environmental and social responsibility

16.1. The university is a socially responsible educational institution and pays attention to the issues of labor protection, safety, ecology and sustainable development.

16.2. Employees are required to comply with the requirements of labor protection, industrial and personal safety, as well as environmental standards.

16.3. Managers provide instruction, control and support to Employees in matters of safety and environmental protection.

16.4. Employees are obliged to rationally use the resources of the University, strive to reduce energy and water consumption, minimize waste and comply with the rules for their disposal.

16.5. The university supports initiatives in the field of volunteering, inclusion, environmental and social projects.

17. Responsibility and compliance with the Code

17.1. Compliance with this Code is mandatory for all Employees of the University, regardless of their position.


17.2. Responsibility for violation of the norms of the Code is determined by the labor legislation of the Republic of Kazakhstan and internal regulatory documents of the University.

17.3. All violations are subject to consideration in accordance with the established procedure.

17.4. An employee has the right to contact their immediate supervisor or HR department for clarification of the provisions of the Code.

17.5. The University allows the possibility of reporting violations by third parties (students, partners, counterparties).

17.6. Disciplinary measures may be applied for confirmed violations, including a reprimand, deprivation of incentive payments, refusal to promote or dismissal.

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17.7. In case of detection of signs of administrative or criminal offenses, the information shall be transferred to the authorized bodies. All violations are subject to consideration in accordance with the established procedure.

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