

«META University»  
Jaýapkershiligi shekteýli  
seriktestigi



Limited Liability Partnership  
«META University»


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

**POLICY**  
**of combating forced labour, modern slavery, human trafficking and child labour**


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## **I. General Provisions**

1. Limited Liability Partnership "META University" (hereinafter referred to as the University) considers respect for human rights and freedoms, personal dignity and freedom of work as basic values that underpin its educational, scientific and administrative activities.

2. The university proceeds from the understanding that work can be considered permissible and legal only if it is voluntary, conscious and fair. Any form of coercion to work, restriction of freedom of choice, exploitation of a person's vulnerable position or involvement in labor activities in violation of his rights are inadmissible and contradict both the legislation of the Republic of Kazakhstan and generally recognized international standards.

3. In today's environment, the risks associated with forced labour, modern slavery, human trafficking and child labour can be not only direct but also hidden, manifesting themselves through opaque labour relations, economic dependence, abuse of office or lack of awareness of workers' rights. The University recognizes the existence of such risks and commits to not only formally eliminate such practices, but also to actively identify and prevent them at the systemic level.


4. This Policy defines a unified approach of the University to ensure the inadmissibility of any forms of labor exploitation. It establishes principles, norms and mechanisms aimed at preventing violations, protecting workers and creating an environment in which respect for human rights is not a declaration, but everyday practice.

5. The Policy applies to all employees of the University, including faculty, administrative staff, technical staff, and also applies when interacting with contractors, suppliers, partners and other third parties.

## **II. Understanding and Disclosure of Key Concepts**

1. For the purposes of this Policy, the University proceeds from an expanded understanding of forms of labor exploitation, which allows taking into account not only obvious violations, but also potentially risky practices.

2. Forced labor is considered as any activity that is not carried out by the free will of a person, but under the influence of pressure, threats, dependence or other forms of coercion. Such coercion is not always physical, it can be expressed in psychological influence, fear of job loss, financial dependence, or limited access to vital resources.

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3. Modern slavery is understood as a condition in which a person is actually deprived of the opportunity to freely dispose of his work and his life. It can manifest itself through debt dependence, excessive control by the employer, the inability to terminate the employment relationship without significant negative consequences, as well as through a systematic understatement of wages with a high degree of employee dependence.

4. Trafficking in human beings is considered one of the most serious violations of human rights and includes any act aimed at involving a person in exploitation through deception, abuse of trust, threats or exploitation of a vulnerable position. It is important that even the formal consent of a person does not exclude the fact of a violation, if it was obtained under pressure or inaccurate information.

5. Child labor in the context of this Policy is understood not only as the illegal employment of persons under the established age, but also as any activity that may harm the health, development or education of a child. The University pays special attention to the distinction between permissible employment of minors (within the framework of the law) and unacceptable forms of exploitation.

6. Labour exploitation is considered more broadly than direct coercion and includes any situation in which labour is used in violation of the balance of interests, without fair compensation, or in conditions that restrict the freedom and dignity of the worker.

7. Thus, the University proceeds from the need to take into account not only the formal signs of violations, but also their actual content and consequences for a person.

### **III. Goals and approach of the University**

1. The main objective of this Policy is to create a sustainable institutional environment in which all forms of forced labour and exploitation are excluded both at the level of internal processes and in interaction with external partners.

2. The University strives to provide such conditions under which each employee:

- ✓ makes a decision on employment voluntarily;
- ✓ has complete and reliable information about working conditions;
- ✓ receives fair remuneration;
- ✓ has the opportunity to freely terminate the employment relationship;
- ✓ Protected from any pressure or abuse.



3. Achieving these goals involves not only compliance with formal legal requirements, but also the introduction of preventive mechanisms aimed at preventing violations, including the development of corporate culture, raising employee awareness and the introduction of internal control tools.

#### **IV. Policy Implementation Principles**

1. The University's activities in this area are based on the principle of unconditional voluntariness of labor, which means that any labor relations are built exclusively on the free consent of the employee, expressed without pressure, threats or manipulations.

2. Equally important is the principle of non-exploitation, which implies that the University does not allow the use of labor in conditions that violate human rights, even if such practices do not formally contradict individual procedures.

3. The principle of legality is implemented through strict compliance with the norms of national legislation and international standards, while the University focuses on a higher level of protection of workers' rights in case of discrepancies.

4. The principle of transparency means that working conditions, including duties, pay, working hours and grounds for termination of employment, are communicated to employees in a clear, understandable and accessible form.


5. The principle of accountability establishes the personal responsibility of managers at all levels for compliance with this Policy and the prevention of any form of violation of employees' rights.

#### **V. The University's Commitment**

1. The University undertakes to provide such working conditions that exclude the possibility of situations related to forced labor or exploitation.

2. This is reflected in the fact that the University:

- ✓ ensures the voluntary nature of all labor relations and does not allow coercion to work either in an explicit or implicit form;
- ✓ guarantees that no employee will be deprived of the right to freely terminate the employment relationship in accordance with the procedure established by law;
- ✓ does not allow the practice of withholding employees' personal documents or other forms of restriction of their freedom;
- ✓ ensures timely and fair remuneration;
- ✓ excludes the involvement of minors in labor in violation of the law;

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- ✓ takes measures to prevent the involvement of employees in any forms of exploitation.

3. In addition, the University extends these commitments to its business relationships, seeking to cooperate only with those organizations that adhere to similar principles.

## **VI. Risk management and control**

1. The university is aware that the risks of labor exploitation can arise not only within the organization, but also in the chain of interaction with counterparties. In this regard, a systematic approach to managing such risks is being introduced.

2. This approach includes regular assessment of potential risks, analysis of working conditions, verification of counterparties, as well as the implementation of internal control procedures.

3. Particular attention is paid to situations that may create prerequisites for covert coercion, including:


- ✓ uneven distribution of the load;
- ✓ dependence of employees on the decisions of managers;
- ✓ lack of transparency in working conditions.

## **VII. Role of the Compliance Service**

1. The Compliance Service of the University performs an independent function of monitoring compliance with this Policy. Its activities are aimed at providing an objective analysis of the situation, identifying potential risks and responding to possible violations.

2. The compliance service considers employee appeals, conducts internal audits, initiates investigations and develops recommendations to eliminate the identified violations.

3. At the same time, special attention is paid to the protection of whistleblowers, including ensuring confidentiality and avoiding negative consequences for whistleblowers.

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### **VIII. Procedure for responding to violations**

1. In case of signs of forced labor, exploitation or other violations, the University immediately takes measures aimed at protecting the rights of workers and eliminating violations.

2. Such measures may include conducting an internal investigation, bringing those responsible to justice, reviewing working conditions, and, if necessary, informing the authorized state bodies.

### **IX. Final provisions**

1. This Policy reflects the University's commitment to the principles of respect for human rights and sustainable development. Its implementation is considered as a continuous process that requires constant attention, analysis and improvement.

2. The University strives to create an organizational environment in which all forms of coercion and exploitation are impossible, and the rights and dignity of each person are an absolute priority.

3. META University LLP adheres to the principle of zero tolerance for forced labor, modern slavery, human trafficking and child labor, considering ensuring human freedom and dignity as the basis of its activities and a key condition for sustainable development.