

«META University»
Jaýapkershiligi shekteýli
seriktestigi



Limited Liability Partnership
«META University»

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

POLICY
ON SUSTAINABLE PROCUREMENT

First edition


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TERMS, ABBREVIATIONS AND DEFINITIONS

The term	Definition
META University LLP	Limited Liability Partnership "META University"
UN Global Compact	An international initiative in the field of sustainable development, the purpose of which is to introduce ten basic principles in the field of human rights, labor relations, environmental protection and anti-corruption into the activities of the business community.
PDA	due diligence of counterparties described in this Policy for conducting due diligence of counterparties
Kpi	performance indicators of META University LLP or its structural divisions, which allow measuring the degree of achievement of the set strategic goals in terms of effectiveness and efficiency.
SMEs	Small and medium-sized businesses
United Nations (United Nations)	an international organization established to maintain and strengthen international peace and security, as well as to develop cooperation between states;
Media	mass media;
GWS	Goods, works, and services.
Sustainability	organizational principle of achieving the goals of META University LLP, in which the needs and its stakeholders are met with the preservation and development of human and natural resources necessary to meet the needs of future generations;
ESG (Environmental, Social, Governance)	is a set of management characteristics of META University LLP, which achieves the involvement of students and employees in solving environmental, social and managerial problems and sustainable development: the principles of the UN Global Compact.
LCC	Life cycle cost
ESG risk (Environmental, Social and Governance)	it is a type of risk that determines the sustainable development of META University LLP within the framework of environmental, social, and corporate governance risks
SDGs (Sustainable Development Goals) or SDGs (Sustainable Development Goals)	which are a set of 17 interrelated goals developed in 2015 by the UN General Assembly as a "blueprint for achieving a better and more sustainable future for all".

1. GENERAL PROVISIONS

1.1 This Policy has been developed as part of the implementation of the ESG strategy and the Quality Management System (QMS) of the University.

1.2 This Policy establishes the obligations of META University LLP in the field of sustainable procurement, establishes the principles, main parameters and conditions for the implementation of sustainable procurement, taking into account the commitment to the principles of sustainable development.

1.3 This Policy integrates the requirements of ISO 9001:2015 (clause 7.1.4 – Environment for the functioning of processes) and the principles of ESG and (SDGs 7, 13, 8, 12).

1.4 The Policy applies to all employees, faculty, students and other interested stakeholders of META University LLP.

1.5 This Policy is based on the "Sustainable Development Policy of META University LLP" "Principle 3. The team of META University LLP takes care of the environment."



1.6 The policy aims to achieve SDG 7 (Affordable and Clean Energy), SDG 8 (Decent Work and Economic Growth) and SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action).

1.7 The management of META University LLP *takes responsibility for* (according to the principles of SDGs 7, 8, 12, 13):

1.7.1 ensure the purchase of equipment, office equipment and lighting fixtures with the highest energy efficiency classes (not lower than class A).

1.7.2 support the implementation of "smart" technologies in the university infrastructure (motion sensors, climate control systems) by purchasing solutions that reduce the overall energy consumption of the university;

1.7.3 Minimise indirect greenhouse gas emissions by optimising supply logistics and preferring suppliers using environmentally friendly transport;

1.7.4 use the procurement process as a tool for climate education, demonstrating to students and partners the university's commitment to decarbonization;

1.7.5 monitor counterparties for compliance with labor legislation, ensuring safe working conditions and non-discrimination;

1.7.6 Promote the economic growth of the region by giving priority to local bona fide suppliers and small businesses, all other things being equal;

1.7.8 implement green procurement criteria, giving preference to recyclable packaging, recycled products and products with a long life cycle;

1.7.9 The management takes responsibility for reviewing consumption rates within the University in order to eliminate the purchase of unnecessary goods and minimize the amount of waste generated.

1.8 The management of META University LLP undertakes to allocate the necessary resources annually for the implementation of this policy and conduct a regular audit of the compliance of procurement procedures with the stated goals of the SDGs.

1.9 This Policy should be read in conjunction with the Code of Conduct, the Anti-Bribery and Corruption Policy, the Development Plan of META University LLP, and other applicable policies and procedures.

1.10 Sustainable procurement involves the integration of sustainable development principles into procurement decisions. Purchased GWS are designed to meet needs, minimize environmental impact, comply with ethical and business standards, and contribute to social and economic development.

2. PURPOSE AND SCOPE OF APPLICATION

2.1 The purpose of this Policy is to create a management system that is aimed at meeting needs.

2.2 Reducing the negative impact on the environment and supporting social responsibility.

2.3 Saving resources, respecting human rights, supporting local suppliers.

2.4 Objectives:

2.4.1 Transition to energy-efficient equipment (SDG 7).

2.4.2 Reducing the volume of "purchased" waste (SDG 12).

2.4.3 Greening office space (SDGs 12, 13).

2.5 Greening KPIs (SDGs 4, 7, 12, 13):

2.5.1 KPI 1: share of purchased equipment with energy efficiency class A and higher (100% of new purchases).

2.5.2 KPI 2: Percentage of suppliers using reusable or fully recyclable containers (15-20% annual growth)

2.5.3 KPI 3: Share of green office products in total stationery (>50% by the end of 2027)

2.5.4 KPI 4: ESG screening coverage of key suppliers (by cost) (80% of critical suppliers)



- 2.5.5 KPI 5: share of purchases from local suppliers (SMEs) in the total annual volume (at least 30-40%)
- 2.5.6 KPI 6: introduction of the topic of sustainable procurement in educational cases or theses, the goal is the number of students involved in the environmental audit of the university's procurement as part of the internship (at least 5-10 people per year).

3. MAIN DIRECTIONS OF IMPLEMENTATION

3.1 ENVIRONMENTAL minimization of negative impacts on the ecosystem within the framework of Principle No3 and SDGs 12, 13.

3.1.1 Priority of "Circularity" - the transition from the "buy - use - throw away" model to the purchase of goods to be repaired, reused or easily recycled;

3.1.2 Energy efficient supply - mandatory inclusion of requirements for the energy consumption class in technical specifications for the purchase of server equipment, office and household appliances (SDG 7).

3.1.3 Product safety - strict control over the safety certificates of goods, especially those used in educational laboratories and catering facilities.

3.2 SOCIAL: Ensuring decent working conditions and transparency throughout the supply chain (SDG 8).

3.2.1 Supplier screening – checking contractors for compliance with labor rights, non-discrimination and ensuring labor safety. Suppliers who violate the norms of the labor code are excluded from the pool of partners.

3.2.2 Inclusiveness - support in the procurement of organizations that provide jobs for people with disabilities or implement social projects;

3.2.3 Product safety - strict control over product safety certificates, especially those used in educational laboratories and catering facilities;

3.3 GOVERNANCE (Economic Direction - "Effective Governance"):

3.3.1 Move from "lowest cost" to "total cost of ownership" (SDG 8, 12).

3.3.1.1 Life Cycle Assessment (LCC) - **When making a purchase decision, not only the contract price is taken into account, but also the cost of electricity during operation, maintenance and subsequent disposal.**

3.3.1.2 Support for SMEs - development of procedures that facilitate participation in tenders for local small and medium-sized enterprises, which stimulates the region's economy and reduces logistics costs.

3.3.2 Using the procurement process as part of the university's educational mission (SDG 4, 17).

3.3.2.1 Digitalization of procurement is a complete transition to electronic document management (Paperless) to reduce the use of paper.

3.3.2.2 Live laboratory - involvement of graduating departments and their students in the development of environmental criteria for new tenders, turning procurement into an object of scientific research.

4. MANAGING AND DEVELOPING A SUSTAINABLE SUPPLY CHAIN

4.1 Supply chain management in META University LLP is based on the integration of ESG principles and contribution to the achievement of the SDGs. The process includes the following actions:



4.1.1 Control and transparency (SDG 12):

control of the process from purchase to delivery and active interaction with suppliers to disclose the origin of materials. META University LLP encourages suppliers to provide data on the environmental footprint of products and the use of secondary raw materials.

4.1.2 ESG-responsive standardization (SDGs 7, 13):

determination and implementation of appropriate supply standards, including requirements for energy efficiency of equipment (class A and above) and minimization of the carbon footprint during the transportation of goods for the needs of META University LLP.

4.1.3 Sustainable tender process (SDGs 8, 12):

Evaluation of bids and tenders not only by the price criterion, but also by their contribution to sustainable development. Provision of long-term contracts to partners who have confirmed compliance with environmental and social standards, which ensures stable economic growth.

4.1.4 Conducting due diligence of counterparties:

mandatory verification of suppliers for compliance with ethical standards, the absence of corruption risks and compliance with the labor legislation of the Republic of Kazakhstan.

4.1.5 Sustainability risk management (ESG risks):

risk management by procurement categories in accordance with the internal documented risk management procedure of META University LLP. Particular attention is paid to environmental risks (environmental pollution) and social risks (violation of safety regulations on the supplier's side).

4.1.6 Efficient and green logistics (SDG 13):

optimizing delivery routes to reduce greenhouse gas emissions.

4.1.7 Partnerships and development (SDGs 17, 8):

development of long-term partnerships with suppliers. META University LLP, as an academic environment, undertakes to provide methodological support and promote the training of suppliers in the field of sustainable development and improving their ESG performance.

5. PROCEDURE FOR SUBMISSION AND FORMATION OF PURCHASE REQUESTS

5.1 Application Process:

5.1.1 **Initiation** – the head of the structural unit (initiator) (department/division/department/department/faculty) forms an application in accordance with the form in the Annex of this Policy **F.DSR-8.4/7.1.1-2026-01** in electronic form. Before submitting an application, the initiator is obliged to check the availability of similar goods or the possibility of restoration/repair of existing equipment (**SDG 12**).

5.1.2 **Formation of an application** - when drawing up the terms of reference, the initiator must include minimum "stable" requirements (for example, energy efficiency class, absence of toxic materials, availability of certificates of conformity).

5.1.3 **Approval (according to EDM)** - the application is signed by the head of the AC, if necessary - by the supervising vice-rector, approved and checked by the head of the "Anti-Corruption and Legal Support Department" (comprehensive analysis for risk assessment), the Economic Planning Department (for reconciliation with the planned procurement budget).

5.1.4 If necessary, *the approval should include the* head of the Department of Digital Development and Information Technology (in case of purchase of digital equipment, office equipment, MFPs, software or other equipment related to computer equipment)

5.1.5 If necessary, *the approval should include the* head of the administrative and economic department in order to eliminate problems related to procurement, logistics, compliance with



other standards required by the legislation of the Republic of Kazakhstan in the field of procurement.

5.1.6 The application is processed to find a supplier that complies with the sustainable procurement policy in the procurement department

6. INTERACTION WITH SUPPLIERS

6.1 META University LLP strives to cooperate with partners who share the values of sustainable development (ESG) and Principle 3 (Respect for the environment). The priority areas are environmental safety (SDGs 12, 13), decent working conditions (SDG 8), anti-corruption transparency and social contribution.

6.2 META University LLP supports the economy of the region by giving priority to local suppliers, provided that they meet quality and ethical standards.

6.3 META University LLP encourages suppliers to implement the principles of sustainable development through a system of recognition of achievements and taking into account the ESG rating when conducting competitive procedures.

6.4 Criteria for the selection and admission of suppliers.

6.4.1 Counterparties are allowed to participate in procurement procedures if:

- strive to minimize waste, introduce energy-efficient technologies (SDG 7) and reduce their carbon footprint;
- are direct manufacturers or official dealers who guarantee the stable quality of GWS.
- have an impeccable business reputation, have successfully passed the check for the absence of corruption risks;
- ensure safe working conditions, eliminating injuries and discrimination (SDG 8).
- demonstrate financial stability and provide the best total cost of ownership (taking into account price, operating and disposal costs).

6.5 Supplier assessment is based on a comprehensive analysis of:

- technical competence and availability of qualified personnel;
- compliance with the requirements of environmental legislation and anti-corruption standards;
- the ability to ensure uninterrupted supply and respond flexibly to the needs of the educational process.


6.6 Counterparty Due Diligence (CCP) and Anti-Corruption

6.6.1 In accordance with ISO 37001, the University applies the principle of "zero tolerance" to corruption. The PDA is a mandatory step before assuming any obligations under the transaction.

6.6.2 The PDA system includes: - identification and assessment of the risks of the counterparty's involvement in corruption schemes, fraud or legalization of illegal income. Verification for compliance with international sanctions regimes. Monitoring of compliance with the Code of Business Ethics of META University LLP.

6.6.3 The purpose of the PDA is to protect the reputation and assets of META University LLP, as well as to ensure full transparency of spending.

6.7 ***Internal procedure for approving contracts with GWS suppliers:*** concluded contracts for the supply of goods, works and services (GWS) undergo a mandatory multi-level approval

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procedure in the electronic document management system (or on paper). The goal is to minimize legal, financial, corruption and environmental risks.

6.7.1 In order to optimize the "Procurement" process information map of META University LLP-DSR-IKP-5.3/9.3-2026-02, the Contract is reviewed in accordance with the form **F.DSR-8.4.2-2026-2** of this Policy on the structure of:

6.7.2 Anti-Corruption and Legal Support Department - verification of compliance with the legislation of the Republic of Kazakhstan, anti-corruption clause (ISO 37001), verification of the signatory's authority, "legal purity" of the contract.

6.7.3 Economic Planning Department - verification of compliance with the budget (procurement plan), and cost efficiency according to the LCC principle.

7. FINAL PROVISIONS

7.1 This Sustainable Procurement Policy (hereinafter referred to as the Policy) is approved by the Order of the Rector of META University LLP and comes into force from the date of its signing.

7.2 From the moment this Policy comes into force, all previously adopted internal regulations of META University LLP governing procurement processes are in effect to the extent that they do not contradict this document.

7.3 Responsibility

7.3.1 The Head of the Procurement Department is responsible for the overall coordination and implementation of sustainable development principles in procurement activities.

7.3.2 Heads of structural subdivisions (deans of faculties, heads of departments, heads of departments) are personally responsible for compliance with sustainability criteria when forming applications for the purchase of GWS.

7.3.3 Employees responsible for conducting CCP procedures and negotiating contracts are responsible for identifying corruption risks in accordance with the requirements of ISO 37001.

7.3.4 Violation of the provisions of this Policy by employees of META University LLP entails disciplinary measures in accordance with the Labor Code of the Republic of Kazakhstan and internal labor regulations.

7.4 Monitoring and updating

7.4.1 This Policy is subject to regular review at least once every 3 years or as the internal processes regulated by it change. If, as a result of changes in the legislation of the Republic of Kazakhstan, certain provisions of this Policy come into conflict with the current legislation, these provisions shall become invalid and until amendments to this Policy are made, it is necessary to be guided by the current legislation of the Republic of Kazakhstan.

7.4.2 Proposals for improving this Policy may be sent by any employee of META University LLP to the Strategic Development Department, the Administrative and Economic Department, or the Anti-Corruption and Legal Support Department in the form of an EDM memo of META University LLP.

7.4.3 Changes and additions to the Policy are registered and issued in accordance with the form **F. DSR-7.5-2025-05-04**, according to the DP, "Documented Information".

7.4.4 The assessment of the effectiveness of the implementation of the Policy is carried out as part of the annual internal audit of the QMS for compliance with paragraph 8.4-ISO 9001.

7.5 Access to information



7.5.1 This Policy is an open document. It is subject to mandatory publication on the official website of META University LLP for review by current and potential suppliers, students and other interested parties.

7.5.2 All new employees of META University LLP, whose activities are related to the process of material and technical support, must be familiarized with the Policy against signature.

8. RISKS ASSOCIATED WITH THE PROCESS AND RISK PREVENTION ACTIVITIES

8.1 Risks associated with:	8.2 Risk Prevention Actions:
<ul style="list-style-type: none">• failure to meet deadlines, inadequate quality of GWS - untimely delivery of training materials or software.• Environmental risks - rapid failure of equipment, increase in waste volumes and costs; Reputational damage to the university, fines, environmental pollution. Accumulation of non-recyclable plastic on campus.• Corruption and conflict of interest - unreasonable overpricing, selection of incompetent persons; purchase of counterfeit or uncertified equipment. Risk of bankruptcy of the supplier after receiving an advance.• Injuries during work are accidents during repairs or cleaning on the territory of the university. Use of illegal labor by GWS suppliers.	<ul style="list-style-type: none">• Diversification of the supplier base (the presence of duplicate partners); development of local suppliers;• The LCC (Life Cycle Costing) criterion is used to assess the cost of ownership, not just the purchase price. Inclusion of an "environmental clause" in contracts; the requirement of ISO 14001 certificates or their equivalents. Require suppliers to use returnable containers or biodegradable packaging.• Mandatory passing of the PDA (Compliance Check); implementation of ISO 37001 anti-corruption standards. Requirement of certificates of conformity (ISO 9001) at the tender stage; incoming quality control of goods. Scoring of the supplier's financial statements; use of bank guarantees.• Checking the availability of an occupational health and safety system at suppliers; the requirement to comply with the "Golden Rules" of safety. Annual ESG survey of key suppliers; Audit of working conditions (for large contracts).

ANNEXES

F.DSR-8.4/7.1.1-2026-01(mandatory)

APPLICATION No _____
for fixed assets (material and technical supply
taking into account the principles of sustainable development)
 (specify what)

Name of the structural subdivision (initiator): _____

Name of GWS (type of GWS to be purchased): _____

JUSTIFICATION APPLICATION Procurement

A purchase offer is made by:

 (head of the structural unit,
 commandant, position, full name, in. phone, e-mail)

The need for procurement is due to the following circumstances:

№	Name of GWS	Technical specifications (type, type, brand, size, weight, wattage, etc.)	Unit Ism	Quantity	Educational program*
1					

**Mandatory completion for consolidated applications from faculties*

Total Cost of Ownership (LLC) LIFE CYCLE COST (LLC) principles

Indicate whether additional disposal costs or expensive maintenance will be required:

No, standard maintenance.

Yes, special disposal conditions are required (specify which).

Initiator (full name, position): _____ / Signature /

Eco-compliance mark: Compliant/ Needs improvement (check as appropriate)



F.DSR- 8.4.2-2026-2(mandatory)
Form of the approval sheet
to the Agreement_____

APPROVAL SHEET
CONTRACT No _____

to the Sustainable Procurement Policy of META University LLP

Subject of the contract: _____

Counterparty (Supplier): _____

Contract amount: _____ Contract term: _____

Position	Full name	Notes	Signature
Rector/ Supervising Vice- Rector (if necessary)			
Head of the UPBUiA			
Head of the OPKiPO			
Initiator (name of the joint venture)			

