

«META University»  
Jaýapkershiligi shekteýli  
seriktestigi



Limited Liability Partnership  
«META University»

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**APPROVED by**  
**Decree of the President**  
**META University**  
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**REGULATIONS**  
**on the procedure for considering complaints and appeals from employees**  
First edition

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	<i>REGULATIONS</i> <i>on the procedure for considering complaints and appeals from employees</i>	

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## I. General Provisions



1. This Regulation on the procedure for considering complaints and appeals from employees (hereinafter referred to as the Regulation) has been developed in order to ensure the protection of the rights and legitimate interests of employees of META University LLP (hereinafter referred to as the University), the formation of a fair, transparent and safe working environment, as well as the introduction of effective internal control and compliance mechanisms.

2. The University proceeds from the fact that the availability of an accessible, understandable and effective mechanism for filing and considering complaints is a key element of the corporate governance system, preventing violations of labor legislation, preventing discrimination, corruption, abuse and other illegal actions.

3. This Regulation establishes a uniform procedure:

- ✓ submission of complaints and appeals by employees;
- ✓ their registration, review and analysis;
- ✓ decision-making and corrective action;
- ✓ protection of employees who report violations.

4. The Regulation applies to all employees of the University, regardless of their position, category of personnel, form of employment and length of service.

## **II. Goals and objectives of the Regulation**

1. The main purpose of this Regulation is to create an effective and trusting mechanism of interaction between employees and the University on the identification and resolution of problem situations.

2. The implementation of this goal is aimed at:

- ✓ ensuring prompt response to violations;
- ✓ protection of workers' rights;
- ✓ prevention of conflict situations;
- ✓ increasing the level of trust within the team;
- ✓ Creating a culture of openness and intolerance of violations.

## **III. Basic concepts**



1. Within the framework of these Regulations, a complaint is understood as a written or oral appeal of an employee containing information about the alleged violation of his rights, legitimate interests or the norms of the University's internal policy.
2. The appeal may concern:
  - ✓ labor relations;
  - ✓ working conditions;
  - ✓ remuneration;
  - ✓ discrimination;
  - ✓ violations of ethical standards;
  - ✓ abuse of official powers;
  - ✓ other actions affecting the rights of the employee.
  - ✓
3. The complainant is understood to be the employee who sent a complaint or a report of a possible violation.
4. Consideration of a complaint is understood as a set of actions aimed at verifying the stated facts, analyzing them and making appropriate decisions.
5. Confidentiality is understood as the obligation of the University not to disclose information about the applicant without his consent, except in cases provided for by law.

#### **IV. Complaints Guidelines**

1. Complaints are dealt with on the basis of the following principles.
2. The principle of objectivity involves a comprehensive and impartial analysis of the information provided without bias towards the participants in the process.
3. The principle of confidentiality guarantees the protection of information about the applicant and the prevention of its disclosure.
4. The principle of non-harassment means that the employee who filed a complaint cannot be subjected to any negative consequences for the very fact of appealing.
5. The principle of timeliness provides for the consideration of complaints within a reasonable and established time frame.
6. The principle of transparency ensures that procedures are clear and that the applicant is informed of the progress of the proceedings.



## **V. Complaint Submission Procedure**

1. The employee has the right to file a complaint in any available way, including:
  - ✓ contacting the Compliance Service;
  - ✓ contacting the HR department;
  - ✓ contacting the immediate supervisor;
  - ✓ sending a written application;
  - ✓ the use of electronic communication channels;
  - ✓ anonymous appeal (if there are appropriate channels).
2. The complaint should contain, if possible:
  - ✓ description of the situation;
  - ✓ date and place of the event;
  - ✓ information about the persons involved;
  - ✓ if available, supporting materials.
3. The lack of complete information is not a basis for refusal to consider it.

## **VI. Registration and recording of complaints**

1. All complaints received are subject to mandatory registration in the established accounting system.
2. Registration includes:
  - ✓ assignment of a unique number;
  - ✓ fixing the date of receipt;
  - ✓ determination of the responsible department.
3. Complaints are recorded in compliance with confidentiality requirements.

## **VII. Complaint Review Procedure**

1. After registration, the complaint is transferred for consideration to the authorized unit (Compliance Service or HR).
2. The review process includes:
  - ✓ initial analysis of the content of the complaint;
  - ✓ determination of the need for inspection;
  - ✓ collection of information and documents;
  - ✓ conducting interviews with stakeholders;
  - ✓ assessment of facts and circumstances.



3. If necessary, a commission can be created.
4. Consideration of the complaint is carried out in compliance with the balance of interests of all parties and the exclusion of a conflict of interest.

### **VIII. Processing Time**

1. Preliminary consideration of the complaint is carried out within 5 working days from the date of registration.
2. Full consideration and decision-making is carried out, as a rule, within 20 working days, depending on the complexity of the situation.
3. If necessary, the period may be extended with notification of the applicant.

### **IX. . Decision-making and response measures**

1. Based on the results of the review, the following decisions may be made:
  - ✓ recognition of the complaint as justified;
  - ✓ partial confirmation;
  - ✓ rejection of the complaint in the absence of violations.
2. In case of confirmation of violations, the following measures are taken:
  - ✓ disciplinary sanctions;
  - ✓ revision of working conditions;
  - ✓ elimination of identified violations;
  - ✓ improvement of internal procedures.

### **X. Informing the applicant**

1. The applicant is informed:
  - ✓ on the registration of the complaint;
  - ✓ on the progress of consideration (if necessary);
  - ✓ on the results of the consideration.
2. The information is provided within the limits that do not violate the rights of other persons.

### **XI. Protection of whistleblowers**



1. The University guarantees that employees who report violations in good faith are protected against:

- ✓ dismissals;
- ✓ pressure;
- ✓ deterioration of working conditions;
- ✓ other negative consequences.

2. Any attempts to persecute are considered a violation.

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

1. Compliance Service:

- ✓ ensures the independence of consideration;
- ✓ monitors compliance with procedures;
- ✓ analyzes systemic risks;
- ✓ forms recommendations for management.

## **XIII. Monitoring and analysis**

1. The University regularly analyzes the complaints received in order to:

- ✓ identification of systemic problems;
- ✓ process improvement;
- ✓ improving the level of corporate culture.

## **XIV. Final provisions**

1. This Regulation is mandatory for all employees of the University and is aimed at forming an effective system of internal control and protection of employees' rights.