



ALMATY  
TECHNOLOGICAL  
UNIVERSITY

JSC "Almaty Technological University"

Quality Management System

ATU-DHRD-DP-7.2-2026-04

Date of introduction: « \_\_ » \_\_\_\_\_ 20\_\_ г

**APPROVED**

Rector of JSC "ATU"

\_\_\_\_\_ T. Kulazhanov

« \_\_\_\_ » \_\_\_\_\_ 2026 y.

**Regulation on the Corporate Code of Ethics**

**ATU-DHRD-DP-7.2-2026-04**

**AGREED**

First Vice-Rector

\_\_\_\_\_ B. Nurakhmetov

« \_\_\_\_ » \_\_\_\_\_ 2026 y.

Almaty, 2026 y.

## **1. GENERAL PROVISIONS**

1.1 This Corporate Code of Ethics has been developed in accordance with the provisions of the current legislation of the Republic of Kazakhstan, the internal documents of JSC “ATU”, including the Corporate Governance Code in the field of higher and postgraduate education, and establishes the fundamental values and principles of corporate ethics, as well as standards of business conduct.

1.2 The purpose of this Code is to develop a quality culture for effective interaction with stakeholders through the application of business conduct practices and to develop a unified corporate culture based on high ethical standards, both in making strategically important decisions and in everyday situations.

1.3 JSC “ATU” expects every official and employee to adhere to the following core corporate values:

1.3.1 competence and professionalism in the performance of work duties;

1.3.2 reliability and impartiality in actions;

1.3.3 efficiency and effectiveness in improving professional skills and contributing to the development strategy of JSC “ATU”;

1.3.4 social responsibility for the activities of JSC “ATU”, aimed at maintaining and enhancing its business reputation and positive image within the professional community;

1.3.5 trustworthy relationships and high cultural and moral standards that contribute to an atmosphere of trust and fairness within JSC “ATU”;

1.3.6 readiness for change in accordance with modern requirements, as well as orientation toward dynamism and a creative approach to task execution and job responsibilities;

1.3.7 honesty and respect toward employees, stakeholders, and JSC “ATU” as a whole.

1.4 In carrying out its activities, JSC “ATU”:

1.4.1 complies with the legislation of the Republic of Kazakhstan, decisions of the shareholder and state authorities, as well as other documents related to the activities of JSC “ATU”;

1.4.2 ensures respect for human rights;

1.4.3 acts fairly and in good faith, demonstrating zero tolerance for corruption;

1.4.4 treats officials and employees fairly, with respect, and in compliance with ethical standards;

1.4.5 shows respect and care for the environment;

1.4.6 focuses its professional activities on results;

1.4.7 expressed in high-quality training of professional personnel, scientific achievements, and the promotion of a high intellectual culture in society.

1.5 This Code is applied in conjunction with other internal documents and reflects the activities of officials and employees of JSC “ATU”.

## **2 CORPORATE ETHICS STANDARDS**

### ***2.1 Ethics of business conduct at JSC “ATU”***

In creating and maintaining a comfortable working environment, employees and officials shall observe the following norms and rules:

2.1.1 respect the honor and dignity of every person and citizen regardless of origin, social, official or property status, gender, race, nationality, language, religion, beliefs, place of residence, or any other circumstances;

2.1.2 show respect for the state and other languages, traditions, and customs of all peoples;

2.1.3 be polite and correct, while remaining intolerant of indifference and rudeness;

2.1.4 be attentive to others’ opinions and always express gratitude for assistance, even if it is not fully sufficient;

2.1.5 ensure consistency between words and actions, fulfill promises, and acknowledge one’s mistakes;

2.1.6 during working hours, not engage in activities unrelated to official duties;

2.1.7 not display bad mood to colleagues;

**Regulation on the Corporate Code of Ethics**  
**ATU-DHRD-DP-7.2-2026-04**

---

- 2.1.8 not use foul language or display aggression or lack of restraint;
- 2.1.9 not engage in inappropriate behavior or make inappropriate statements toward other employees, officials, or the University;
- 2.1.10 assist colleagues and share knowledge and experience;
- 2.1.11 not discuss the personal or professional qualities of colleagues in their absence;
- 2.1.12 not cause, through action or inaction, financial, material, reputational, or other harm to the interests of JSC “ATU”, its structural units, or individual employees;
- 2.1.13 use corporate email of JSC “ATU” as the primary communication tool; all other communication methods are supplementary and optional;
- 2.1.14 not use official computers for purposes unrelated to professional activities;
- 2.1.15 not modify computer configurations without official permission from the structural unit responsible for information systems. Computer relocation shall be carried out only with the permission of the financially responsible person of the unit, and the heads of structural units in coordination with the supervising Vice-Rector.

**2.2 Ethics of conduct outside working hours**

Officials and employees of JSC “ATU” shall:

- 2.2.1 adhere to generally accepted moral and ethical standards, and avoid antisocial behavior, including being in public places in a state of intoxication that offends human dignity and public morality;
- 2.2.2 act modestly and not use their official position for personal gain;
- 2.2.3 not violate legal requirements related to public morality, order, and safety, and not involve other citizens in unlawful or antisocial actions.

**2.3 Ethics of relations between employees and students**

Relations between employees and representatives of the student body are based on subordination, interpersonal ethics, fairness, and honesty:

- 2.3.1 any form of moral or physical pressure by employees on students is unacceptable;
- 2.3.2 employees are obliged to assist students in matters within their competence;
- 2.3.3 any form of humiliation of dignity or public criticism of students (including academic performance) is prohibited. Rudeness, foul language, violation of honor and dignity, and any unlawful actions are not allowed regardless of status;
- 2.3.4 in resolving conflicts among students, employees shall act within this Code and guided by ethical norms and documents protecting civil rights;
- 2.3.5 in conflicts between employees and students, issues shall be resolved by independent representatives, taking into account the interests of both parties;
- 2.3.6 communication of results of assessment activities to students must be conducted in a confidential setting;
- 2.3.7 students shall not be involved in any work not by the academic program;
- 2.3.8 in case of teacher lateness, an apology must be made to students. Teacher absence during classes is unacceptable;
- 2.3.9 teachers must treat all students equally without preference on any grounds;
- 2.3.10 public positive feedback about students is encouraged.

**2.4 Ethics of Relations with Business Partners.**

2.4.1 JSC “ATU” interacts with business partners on the principles of mutual benefit, transparency, and full responsibility for obligations undertaken in accordance with the terms of contracts/agreements, and fulfills its obligations towards them.

2.4.2 In the event of disagreements and disputes, JSC “ATU” gives preference to negotiations and the search for compromise, and also guarantees the timely and full consideration of all requests, suggestions, and claims from partners.

2.4.3 In its relations with business partners, JSC “ATU” adheres to fair and free competition and

condemns all forms of unfair competition, which may not only negatively affect its reputation but also undermine partners' trust in JSC "ATU".

***2.5 Ethics of Relations with the Public.***

JSC "ATU" recognizes its social responsibility to the public and, as an integral part of society, strives to have a positive impact on the resolution of socially significant issues:

2.5.1 supports programs aimed at improving the level of knowledge and education of the population, as well as other social programs within its competence;

2.5.2 establishes constructive relations with organizations (public, non-governmental, and others) in order to improve public relations, protect health, and ensure occupational safety of JSC "ATU" employees;

2.5.3 social responsibility is carried out in accordance with the legislation of the Republic of Kazakhstan, the Charter, and internal documents of JSC "ATU".

***2.6 Ethics of Relations within Structural Units (Teams):***

2.6.1 a spirit of collegiality, openness, and tolerance for different opinions is encouraged. Actions such as personal negativity, speaking ill of others "behind their backs," and spreading rumors are considered incompatible with professional activity;

2.6.2 raising one's voice at anyone, including students, is strictly prohibited;

2.6.3 any preferences or discrimination based on ethnicity, gender, age, financial status, or political views are unacceptable;

2.6.4 political debates on controversial topics and any form of political campaigning for any party on the territory of JSC "ATU" shall be avoided.

**3 CORPORATE CULTURE ETHICS**

***3.1 Ethics of negotiations and employees' appearance – Dress code***

Each employee of JSC "ATU" shall possess the following qualities while performing their official duties:

3.1.1 adhere to business attire standards in clothing and footwear, maintaining a respectable and professional image of JSC "ATU";

3.1.2 maintain a neat appearance and use correct spoken and written language, avoiding vulgarisms and slang;

3.1.3 comply with rules of business communication, including telephone conversations. Business negotiations shall be conducted in a calm and polite tone;

3.1.4 be able to communicate by phone with colleagues and business partners in a manner that contributes to a positive image of JSC "ATU". When speaking on the phone, employees must also consider that colleagues may be present in the same room and avoid disturbing their work with loud conversations;

3.1.5 when preparing business correspondence, including emails and electronic document management messages, employees shall follow business writing rules, which include accuracy, conciseness, literacy, and politeness in presenting information;

3.1.6 demonstrate professionalism, defined as unique and relevant knowledge and the ability to apply such knowledge, competent opinions and judgments, and the ability to achieve required results;

3.1.7 demonstrate initiative by proposing new projects, optimization of functions and business processes, willingness to participate in new projects and working groups, and contribution to improving performance results;

3.1.8 be responsible for achieving results within established deadlines, be ready to take responsibility for failure to fulfill job duties, and ensure a balance between personal goals/interests and the goals/interests of JSC "ATU";

3.1.9 cooperate with colleagues, be willing to participate in projects, respond to colleagues' requests, and share information;

**Regulation on the Corporate Code of Ethics**  
**ATU-DHRD-DP-7.2-2026-04**

---

3.1.10 avoid hostile behavior and excessive familiarity. To eliminate hostile intentions and undue familiarity, the University defines the following unacceptable behaviors:

3.1.10.1 foul language;

3.1.10.2 aggression;

3.1.10.3 unethical behavior;

3.1.10.4 ethnic jokes;

3.1.10.5 abuse of authority;

3.1.10.6 raising one's voice;

3.1.10.7 offensive remarks;

3.1.10.8 obscene gestures, etc., i.e. all actions that may insult or demean a person's honor and dignity.

3.1.11 any employee who has reason to believe that unacceptable actions have been committed against them may report this to the management of JSC "ATU";

3.1.12 all reports of inappropriate behavior must be investigated and treated as confidential, where possible during the investigation, and must be properly resolved;

3.1.13 employees found to have violated the requirements of this policy shall be subject to disciplinary action in accordance with the Instruction on the Procedure for Imposing Disciplinary Sanctions on Employees.

### **3.2 Corporate events**

3.2.1 One of the important elements in shaping corporate culture is the organization of festive events within the team. Traditional corporate holidays include national, state, professional, religious, and other holidays. Festive events are held both within JSC "ATU" and outside its premises (including off-site locations such as countryside or nature areas).

3.2.2 Corporate events include conferences, sports events, training sessions, seminars, and corporate recreational activities.

## **4 CONFLICT OF INTEREST**

4.1 Officials and Employees of JSC "ATU" shall perform their professional duties diligently and prudently in the interests of JSC "ATU", avoiding conflicts of interest.

4.2 A conflict of interest is defined as a situation in which the personal interest of an employee of the Company influences or may influence the impartial performance of their official duties.

4.3 In order to prevent conflicts of interest that may hinder the objective performance of the Board of Directors' duties and to limit political interference in the Board's processes, the Company implements mechanisms for their prevention and regulation.

4.4 The identification and proper management of conflicts of interest is an important condition for ensuring the protection of the interests of the Sole Shareholder.

4.5 In order to prevent conflicts of interest, Officials and Employees of JSC "ATU" shall:

4.5.1 not use, for personal interest or gain, opportunities provided through corporate resources of JSC "ATU", its management, employees, official position, and/or information obtained in the course of performing their duties;

4.5.2 not take direct part in reviewing or making decisions on any relations between JSC "ATU" and themselves;

4.5.3 not participate in any activity that may potentially lead to a conflict of interest;

4.5.4 make every effort to ensure that arising conflicts are resolved in accordance with applicable legislation, taking into account the legitimate interests of all parties involved;

4.5.5 not accept any gifts or use benefits related to their activities at JSC "ATU" from third parties, nor receive any income or benefits as a reward for performing their functional duties;

4.5.6 JSC "ATU" does not permit the acceptance of gifts or benefits, except for symbolic tokens of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy

and hospitality, as well as during protocol and other official events.

4.6 The settlement of conflicts of interest at JSC “ATU” is regulated by this Code and other internal regulatory documents of JSC “ATU”.

## **5 DISCIPLINE, ETHICS, ACADEMIC INTEGRITY, AND ANTI-CORRUPTION COMMISSION**

5.1 The Discipline, Ethics, Academic Integrity, and Anti-Corruption Commission of JSC “ATU” is a consultative and advisory body that considers issues related to strengthening labor and academic discipline, as well as compliance with the Law of the Republic of Kazakhstan “On Combating Corruption” and labor legislation by employees and students of JSC “ATU”.

5.2 The main function of the Discipline, Ethics, Academic Integrity, and Anti-Corruption Commission is to review information on non-compliance with anti-corruption and labor legislation, internal regulations of JSC “ATU”, including this Code.

5.3 The Discipline, Ethics, Academic Integrity, and Anti-Corruption Commission has the right to:

- initiate procedures to identify violations of the provisions of the Code, both on the basis of received complaints and on its own initiative;

- directly address employees and officials regarding non-compliance with the Code.

The Discipline, Ethics, Academic Integrity, and Anti-Corruption Commission:

- participates in the consideration of cases related to non-compliance with the Code;

- ensures independence and impartiality when reviewing disputes related to violations of the Code;

- ensures the anonymity of an employee or official who reports a violation of the Code (if they wish to remain anonymous).

## **6 RESPONSIBILITY**

6.1 All employees of JSC “ATU”, regardless of position or status, shall make managerial decisions in strict accordance with the requirements of this Code on a mandatory basis.

6.2 Each official and employee is responsible for compliance with ethical standards in their conduct. Compliance with the provisions of this Code is mandatory for all officials and employees of JSC “ATU”. Violation of the provisions of this Code shall result in disciplinary liability in accordance with the established procedure.

6.3 All facts of violations of ethical standards in accordance with this Code shall be considered in accordance with the legislation of the Republic of Kazakhstan and the internal regulations of JSC “ATU”.

6.4 Employees shall observe labor discipline and ethical standards established by the Employer’s internal documents. Employees shall compensate the Employer for damages caused within the limits established by the Labor Code of the Republic of Kazakhstan. Employees shall comply with anti-corruption legislation of the Republic of Kazakhstan and the Anti-Corruption Policy of JSC “ATU”. Employees shall not engage in corrupt practices while performing their job duties and shall report any corruption-related offenses to the management of JSC “Almaty Technological University” or the authorized anti-corruption body. Employees shall comply with occupational safety and health requirements, fire safety rules, and industrial sanitation at the workplace.

6.5 Employees shall take care of the Employer’s property. Employees shall not disclose information constituting state secrets, official, commercial, or other legally protected secrets that become known to them in connection with the performance of their job duties. Employees shall inform the Employer of any situation posing a threat to human life and health, the safety of the Employer’s and Employees’ property, as well as any downtime occurrence. Employees shall conclude a written agreement on full material liability with the Employer if their position or work is directly related to

**Regulation on the Corporate Code of Ethics**  
**ATU-DHRD-DP-7.2-2026-04**

storage, processing, sale (issue), transportation, or use of entrusted material assets in production.

6.6 In case of training, professional development, or retraining at the Employer’s expense, the Employee shall work for JSC “ATU” for the period agreed by the parties. In case of termination of employment at the Employee’s initiative or due to the Employee’s fault, the Employee shall reimburse training costs in accordance with Article 118 of the Labor Code of the Republic of Kazakhstan. In order to maintain, expand, deepen, and improve previously acquired professional knowledge and skills, the Employee shall undergo professional development within the timeframes and procedures established by the Employer in accordance with education legislation. The Employee shall be responsible for the timely performance of job duties in accordance with job descriptions.

6.7 All documents and other products created by the Employee in the course of performing their job duties or specific assignments of the Employer (including sketches, drawings, programs, syllabi, educational-methodological complexes (UMC), online courses, etc.) shall belong to the Employer. The rights to innovation patents, patents for inventions, utility models, and industrial designs created by the Employee in the course of their job duties or specific assignments of the Employer (service inventions) shall belong to the Employer.

6.8 Upon termination or cancellation of the employment contract, the Employee shall return all written data, materials, documents, computer passwords, files, programs, all records developed during job performance, as well as confidential information (trade secrets), equipment, tools, and other assets provided and assigned in connection with employment at JSC “ATU”.

6.9 Employees shall possess appropriate theoretical and practical knowledge and skills within their professional competence. Employees shall ensure the quality of educational services in accordance with the requirements of State Mandatory Education Standards (higher and postgraduate education). Employees shall continuously improve their professional competence, intellectual, creative, and academic level, including digital and ICT competencies in educational and scientific activities. Employees shall comply with pedagogical ethics rules. Upon termination or cancellation of the employment contract, employees shall complete previously assigned work, and if impossible, transfer all documents to another employee as instructed by the unit manager, providing detailed information necessary for further work.

**7 RESPONSIBILITIES AND AUTHORITIES**

<b>Unit/ Department</b>	<b>Powers and Authorities</b>
Rector	• approval of this Code and its updated versions in case of amendments;
DHRD	• implementation of this Code;
Heads of Structural Units	• updating of this Code;
Faculty Members and Employees	• registration of controlled copies, informing relevant structural units, and archiving documented information of the QMS;

**8 Process-Related Risks and Risk Prevention Measures**

<b>8.1 Risks associated with:</b>	<b>8.2 Risk Mitigation Actions:</b>
<ul style="list-style-type: none"> <li>• poorly functioning internal channels for the exchange of documented information;</li> <li>• non-compliance with corporate culture and conduct rules;</li> <li>• violations of the internal labor regulations of JSC “ATU”.</li> </ul>	<ul style="list-style-type: none"> <li>• use of the AS “Documentolog 7”, corporate email, and publication of electronic versions of this approved Code on the website only in PDF format;</li> <li>• strict compliance with this Code;</li> <li>• careful study and strict adherence to job descriptions;</li> <li>• conducting introductory seminars on labor legislation.</li> </ul>

## **9 CONFIDENTIALITY**

9.1 This Code is an internal regulatory document of JSC “ATU” and shall not be disclosed to third parties, except for experts of certification bodies during certification audits and partner customers, subject to the permission of the Rector of JSC “ATU”.

9.2 Confidential information of JSC “ATU” shall mean information classified as such in accordance with the legislation of the Republic of Kazakhstan and internal documents of JSC “ATU”.

9.3 Any confidential information possessed by Employees, including Officials, shall be kept strictly confidential unless otherwise expressly provided by the legislation of the Republic of Kazakhstan.

9.4 Employees who have access to confidential information of JSC “ATU” shall not disclose it to other employees who do not have such access, or to any third parties. These restrictions shall also apply for the period established by the internal documents of JSC “ATU” after the termination of employment.

9.5 During the working day and upon leaving the workplace, the Employee must ensure that no documents containing confidential information are left on their desk or in any easily accessible place. All such documents must be securely locked in cabinets or drawers, and the computer must be turned off or locked. During conversations with partners at the Employee’s workplace, all confidential information, including information displayed on the computer screen, must be kept out of the interlocutor’s view.

9.6 Confidential information (in electronic, written, or other form) shall not be taken outside JSC “ATU” without proper authorization from management. Upon termination of employment, the Employee must leave with JSC “ATU” all documents, files, computer media, reports, and records containing information about JSC “ATU” or information not intended for public disclosure, as well as all copies of such documents.

## **10 FINAL PROVISIONS**

10.1 Amendments and additions may be made to this Code.

10.2 The provisions of this Code are mandatory for application and compliance by all employees and teaching staff of JSC “ATU”.

10.3 The administration of JSC “ATU” has the right to review cases of violations of the provisions of this Code at meetings of the relevant structural units and issue appropriate conclusions.

10.4 This Code shall remain in force without limitation in time.

10.5 The decision to amend, supplement, or repeal this Code shall be made by the Rector of JSC “ATU”.

10.6 Issues not regulated by this Code shall be governed in accordance with the current legislation of the Republic of Kazakhstan.

**F. DSD -7.5 -2026-02-02 (NORMATIVE)**

**11 APPROVAL SHEET**

<b>Position</b>	<b>Full Name</b>	<b>Date</b>	<b>Signature</b>
Director of the DSD	Vassilina G.K.		
Head of the OQMS	Tileubayeva D.A.		
Director of the DLSC	Alimbekov M.T.		
Director of the DHRD	Medeubayeva Zh.M.		

**F. DSD -7.5.-2026-02-03 (NORMATIVE)**

**12 INTRODUCTION SHEET**

<b>Position</b>	<b>Full Name</b>	<b>Date</b>	<b>Signature</b>





