

**Approved by Decision of the Board
of Directors of Abylkas Saginov
Karaganda Technical University
NJSC**

Dated May 30, 2025 (Minutes No.4)

**POLICY
of Sustainable Development of
Abylkas Saginov Karaganda Technical
University NJSC**

Karaganda 2025

1. GENERAL PROVISIONS

1. This Policy on the implementation of the sustainable development goals of Abylkas Saginov Karaganda Technical University NJSC (hereinafter referred to as the Policy) has been developed in accordance with the current legislation of the Republic of Kazakhstan, the Charter, the Corporate Governance Code and the other internal documents of Abylkas Saginov Karaganda Technical University NJSC (hereinafter referred to as the Company), taking into account the recommendations of international professional organizations in the field of sustainable development.

2. This Policy defines the main principles and approaches to organizing a corporate system for the implementation of global principles, requirements and provisions of ESG (environmental, social and corporate governance) in the activities of the Company.

3. This Policy applies to all the types of activities of the Company.

4. The Policy is mandatory for familiarization and application by all the collegial bodies, structural divisions and all the employees of the Company, including newly hired employees upon employment in the Company.

5. When performing functional duties and implementing assigned tasks, each employee of the Company is guided by the provisions set out in this Policy.

2. BASIC TERMS AND CONCEPTS

6. The Policy uses the following terms and abbreviations:

1) UN Global Compact: the largest 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. The inclusion of the principles of the UN Global Compact in commercial and business strategies, public confirmation of commitment are widely recognized indicators of responsible corporate practice and good business reputation, as well as important elements of long-term business sustainability;

2) Official: a member of the Board of Directors, an executive body;

3) Sole Shareholder: the supreme body of the Company, the Ministry of Science and Higher Education of the Republic of Kazakhstan;

4) Stakeholders: individuals, legal entities, groups of individuals or legal entities that influence or can be influenced by the activities of the Company, its services and related actions by virtue of the provisions of legislation, concluded agreements (contracts) or indirectly (mediatedly); stakeholders include: shareholders, employees, customers, suppliers, government agencies, creditors, investors, public organizations;

5) Stakeholder map: a tool that allows systematizing and visualizing the information of the Company's environment to develop a strategy for working with each stakeholder;

6) Corporate governance: a set of processes that ensure management and control over the Company's activities and include relations between Shareholders, the Board

of Directors, the Management Board, the other bodies of the Company and Stakeholders in the interests of Shareholders. Corporate governance also determines the structure of the Company, with the help of which its goals, methods for achieving these goals, as well as monitoring and evaluation of performance are established;

7) Company: Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University;

8) Organizations: legal entities, more than fifty percent of the voting shares (participatory interests) in the authorized capital of which directly or indirectly belong to the Company on the basis of ownership or trust management;

9) The United Nations (UN): an international organization formed to maintain and to strengthen international peace and security, as well as to develop cooperation between states;

10) Partners: suppliers and contractors, partners in joint projects;

11) Management Board: the executive body of the Company acting collegially;

12) Development Plan: a document defining the main areas of activity and indicators of the financial and economic activity of the Company for a five-year period;

13) Company Development Program: a document defining the goals, priorities and strategies for the development of an organization of higher and (or) postgraduate education and is of a medium-term nature;

14) Board of Directors: a management body in the Company that is formed by the election of its members by a decision of the Sole Shareholder of the Company responsible for the general management and control over the activities of the Company and the Management Board;

15) Internal Audit Service: a body that exercises control over the financial and economic activities of the Company accountable to the Board of Directors;

16) Sustainable Development: development in which the Company manages the impact of its activities on the environment, economy, society and makes decisions taking into account the interests of Stakeholders. Sustainable development must meet the needs of the present generation without compromising the ability of future generations to meet their own needs;

17) UN Sustainable Development Goals: 17 goals and 169 tasks adopted as part of the UN Agenda for Sustainable Development until 2030 and aimed at ending poverty, preserving the planet's resources and ensuring well-being for everybody:

1. To end poverty in all its forms everywhere
2. To end hunger, to achieve food security and improved nutrition and promote sustainable agriculture
3. To ensure healthy lives and promote well-being for everybody at all ages
4. To ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
5. To achieve gender equality and empower all women and girls
6. To ensure availability and sustainable management of water and sanitation for all
7. To ensure access to affordable, reliable, sustainable and modern energy for all

8. To promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
9. To build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
10. To reduce inequality within and among countries
11. To make cities and human settlements inclusive, safe, resilient and sustainable
12. To ensure sustainable consumption and production patterns
13. To take urgent action to combat climate change and its impacts
14. To conserve and sustainably use the oceans, seas and marine resources for sustainable development
15. To protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss
16. To promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
17. To strengthen the means of achieving sustainable development and revitalize the global partnership for sustainable development.
- 18) ESG (Environmental Social Governance): taking into account environmental, social and governance factors along with financial factors in the decision-making process.

3. GOALS AND TASKS OF THE COMPANY IN THE FIELD OF SUSTAINABLE DEVELOPMENT

7. The Company is aware of the importance of its influence on the economy, ecology and society, ensures its sustainable development in the long term, maintaining a balance of interests of stakeholders. An approach of responsible, thoughtful and rational interaction with stakeholders will contribute to the sustainable development of the Company.

The main goal of this Policy is to ensure the continuity and stability of activities, minimize risks and attract investments through the promotion of ESG and their practical implementation in the activities of the Company.

By implementing the ESG principles, the Company contributes to the achievement of a number of UN Sustainable Development Goals (SDGs). ESG financing and investments help implement projects that are in line with the global SDG agenda.

8. The Company shall ensure consistency of its economic, environmental and social goals for sustainable development in the long term, which include among other things the growth of long-term value for shareholders and investors. Sustainable development in the Company consists of three components: economic, environmental and social ones.

1) The economic component directs the Company's activities to the growth of long-term value, ensuring the interests of shareholders and investors, increasing the

efficiency of processes, increasing investments in the development of more advanced technologies, and increasing labor productivity.

2) The environmental component ensures minimization of the impact on biological and physical natural systems, the optimal use of limited resources, the use of environmentally friendly, energy- and material-saving technologies, the development of environmentally acceptable products, minimizing, processing and destructing waste, and the other relevant activities.

3) The social component is focused on the principles of social responsibility that among other things include ensuring occupational safety and maintaining the health of workers, fair remuneration and respect for workers' rights, individual development of personnel, implementation of social programs for personnel, creation of new jobs, sponsorship and charity, holding environmental and educational campaigns, and other relevant activities.

9. The Company analyzes its activities and risks in these three aspects, and also strives to prevent or to reduce the negative impact of the results of its activities on stakeholders.

10. The Company participates in external assessment processes for the level of sustainable development (based on the analysis of implementing the SDGs) through the implementation of international rating indicators.

4. PRINCIPLES OF SUSTAINABLE DEVELOPMENT OF THE COMPANY

11. The principles that guide the Company in implementing its sustainable development policy are as follows:

- 1) Openness;
- 2) Accountability;
- 3) Transparency;
- 4) Ethical behavior;
- 5) Legality;
- 6) Respect for human rights;
- 7) Intolerance of corruption;
- 8) Inadmissibility of conflicts of interest.

5. ORGANIZATIONAL STRUCTURE OF THE MANAGEMENT SYSTEM IN THE FIELD OF SUSTAINABLE DEVELOPMENT

12. The Company builds a sustainable development management system that shall include inter alia the following elements:

1) commitment to the principles of sustainable development and adherence to the sustainable development goals of the United Nations in the Republic of Kazakhstan at the level of the Sole Shareholder, the Board of Directors, the executive bodies and employees;

2) involvement of the Company's officials in promoting sustainable development issues;

- 3) analysis of the internal and external situation in three components (economic, ecological, social issues);
- 4) ensuring sustainability of supply chain management;
- 5) identification of risks in the field of sustainable development in the social, economic and environmental spheres;
- 6) building a Stakeholder map/maintaining a register of related parties;
- 7) determining the areas and formats of interaction with the state and the Company;
- 8) defining goals and KPIs in the field of sustainable development, developing an action plan and identifying responsible persons;
- 9) motivating members of the executive body and the other employees of the Company to implement the principles of sustainable development in the activities of the Company, including linking remuneration with the results in the field of sustainable development;
- 10) integration of sustainable development into the key processes, including risk management, planning, human resource management, investments, reporting, operational activities, as well as into the development plan and decision-making processes;
- 11) improving qualifications of officials and employees in the field of sustainable development;
- 12) regular monitoring and evaluation of sustainable development activities, evaluation of the achievement of goals and KPIs, taking corrective measures, introducing a culture of continuous improvement.

13. Sustainable development is integrated into:

- 1) the management system;
- 2) the development plan;
- 3) the key processes, including risk management, long-term, medium-term and short-term planning, reporting, risk management, human resources management, investments, operational activities, as well as into decision-making processes at all the levels, starting from the Sole Shareholder, the Board of Directors, the Management Board, and ending with ordinary employees.

14. The organizational structure of sustainable development management in the Company includes the following entities:

- 1) the Board of Directors;
- 2) the Strategic Planning Committee;
- 3) the Management Board;
- 4) the Department of Strategic Planning and Quality Assurance;
- 5) the Center of Sustainable Development;
- 6) Stakeholders (in accordance with the Stakeholder Map).

15. The management structure in the area of sustainable development of the Company is presented at several levels with the involvement of the following bodies and divisions of the Company (Figure 1).

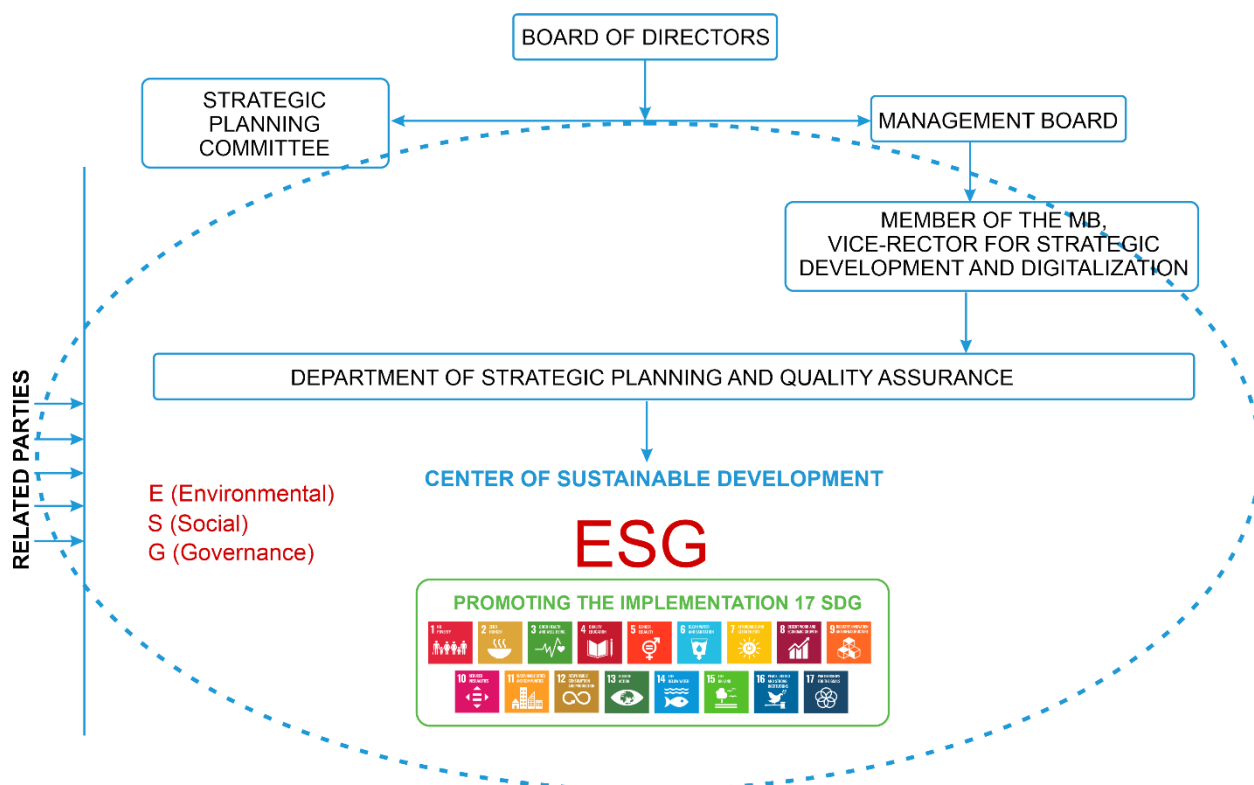


Figure 1. Structure of the management system in the field of sustainable development

16. Participants in the sustainable development process perform their role through the implementation of rights and obligations within the framework of competencies enshrined in legislative acts and internal documents of the Company, and in accordance with organizational and administrative documents, job descriptions and the Regulation on structural divisions.

17. External stakeholders are represented by government agencies, suppliers and consumers of the Company's services, whose interests depend on the activities of the Company.

6. FUNCTIONS AND RESPONSIBILITIES OF PARTICIPANTS IN THE MANAGEMENT SYSTEM IN THE FIELD OF SUSTAINABLE DEVELOPMENT

18. The Board of Directors is the management body that bears the key responsibility to the Sole Shareholder for the sustainable development management issues of the Company.

19. The Board of Directors of the Company exercises strategic management and control over the implementation of sustainable development.

The Board of Directors performs the following functions on sustainable development management system issues:

1) approves the Sustainable Development Policy of the Company and the action plan;

2) reviews reports on the effectiveness of the sustainable development management system.

20. The Strategic Planning Committee assists the Board of Directors of the Company on the issues of control over reliability and effectiveness of sustainable development management and performs:

1) analysis of the effectiveness of sustainable development management;

2) analysis of auditors' reports on the state of sustainable development management;

3) control over the implementation of recommendations of the internal and external auditors of the Company regarding the sustainable development management system;

4) analysis of proposals for improving sustainable development management;

5) preliminary review, before approval by the Board of Directors, of the Company's internal documents defining the organization and functioning of sustainable development management, the Sustainable Development Management Policy and subsequent amendments thereto.

21. The Management Board is the executive body of the Company and is responsible for the implementation of this Policy. The Management Board of the Company formulates a relevant action plan and submits it for consideration by the Board of Directors, ensure implementation of risk management procedures by employees with the appropriate qualifications and experience, and perform the following functions on sustainable development management issues:

1) ensuring the development and implementation of internal regulatory documents approved by the Board of Directors;

2) ensuring the creation and effective functioning of sustainable development management within the framework of the Company's current activities;

3) submitting information on the results of the Company's sustainable development management for consideration by the Board of Directors;

4) is responsible for the implementation of decisions of the Board of Directors and recommendations of the Strategic Planning Committee for organization of sustainable development management;

5) distribution of powers, duties and responsibilities for specific sustainable development management procedures;

6) approval of regulatory and methodological documents of the Company on the issues of the organizing and functioning of sustainable development management, with the exception of documents the approval of which falls within the competence of the Board of Directors of the Company;

7) monitoring sustainable development management in accordance with the requirements of internal regulatory documents;

8) reviewing the reporting of the sustainable development management of the Company once a year;

9) ensuring the improvement of sustainable development management processes and procedures, taking into account changes in the external and internal environment.

22. The Center of Sustainable Development performs the following tasks:

1) general coordination of management processes in the field of sustainable development;

2) development of methodological documents in the field of sustainable development, formation of action plans for improving the management system in the field of sustainable development, reports on their implementation;

3) analysis of the current situation in three main areas: economic, environmental and social. When conducting this analysis, the reliability, timeliness and quality of information are important;

4) identification of risks in the field of sustainable development. Risks are distributed in accordance with the three areas of sustainable development, can also affect related areas and cover other risks. To determine the risks, an analysis of both internal and external factors affecting the Company is carried out;

5) determination of goals, and, if possible, target indicators, measures to improve and perfect the organization's activities in three components, responsible persons, resources and deadlines;

6) regular monitoring and evaluation of the implementation of goals, activities to achieve target indicators;

7) systematic and constructive interactions with stakeholders, receiving feedback;

8) implementation of the formed plan;

9) regular reporting on the implementation of the principles of sustainable development once a year.

23. The Board of Directors and the Management Board of the Company ensure the formation of an appropriate system in the field of sustainable development and its implementation.

All the employees and officials at all the levels contribute to sustainable development through personal behavior and compliance with relevant policies and standards.

24. The sustainable development management system defines and consolidates the roles, competences, responsibilities of each body and all the employees for the implementation of principles, standards and relevant policies and plans in the field of sustainable development.

25. The Company implements special training and advanced training programs on sustainable development. Training is a permanent element in the implementation of sustainable development. The officials of the Company promote the involvement of employees in sustainable development based on understanding and commitment to the principles of sustainable development and changing the culture, behavior in conducting activities and fulfilling duties.

26. The Company develops action plans in the area of sustainable development by:

1) analyzing the current situation in three main areas: economic, environmental and social. When conducting this analysis, reliability, timeliness and quality of information are important;

2) identifying risks in the area of sustainable development. Risks are distributed in accordance with the three areas of sustainable development and may also affect related areas and cover other risks. To identify risks, an analysis of both internal and external factors influencing the Company is carried out;

3) identifying stakeholders and their influence on activities;

4) defining goals, as well as, if possible, target indicators, measures to improve and perfect the organization's activities in three components, responsible persons, resources and deadlines;

5) regular monitoring and evaluation of the implementation of goals, measures to achieve target indicators;

6) systematized and constructive interacting with stakeholders, receiving feedback;

7) implementing the formed plan;

8) continuous monitoring and regular reporting;

9) analyzing and evaluating the effectiveness of the plan, summing up the results and taking corrective and improving measures.

27. The benefits of implementing sustainable development principles include the following:

1) attracting investment: in global practice, when determining investment attractiveness, investors take into account the efficiency in the field of sustainable development;

2) improving management efficiency and minimizing risks: integrating environmental and social aspects into the process of making management decisions allows expanding the horizons of planning and taking into account a more diverse range of risks and opportunities, which creates prerequisites for sustainable business development;

3) increasing efficiency: the introduction of modern technologies allows developing innovative products and services, while increasing the competitiveness and efficiency;

4) strengthening reputation: improving the corporate image is a direct result of activities in the field of sustainable development, which increases the brand value and builds trust, as well as renders a positive impact on the quality of interaction with business partners;

5) increasing loyalty on the part of internal and external stakeholders - creating attractive working conditions, opportunities for professional and career growth allows us to attract and retain promising qualified specialists; building an effective dialogue with stakeholders helps to create a positive environment around the Company's activities, which helps to improve business efficiency through understanding and support from customers, shareholders, investors, government agencies, local populations, and public organizations.

28. The Company annually develops and publishes a report on sustainable development. It is permissible to present the information of sustainable development

in the form of a separate report or as part of the Company's annual report in the first quarter of the year following the reporting period.

29. The report on sustainable development is approved by the Board of Directors and communicated to stakeholders by posting it on the corporate Internet resource and/or providing it on paper.

7. INTERACTION WITH STAKEHOLDERS

30. To implement successful and effective sustainable development policy, the Company pays due attention to interaction with stakeholders.

31. The Company ensures sustainable development, maintains a balance of interests of stakeholders. Activities in the field of sustainable development comply with the best international standards.

In the course of its activities, the Company influences or is influenced by stakeholders.

Stakeholders can have both a positive and negative impact on the Company's activities, namely on sustainable development, reputation and image, create or reduce risks. The Company attaches great importance to proper interaction with stakeholders.

To determine the list of stakeholders, the degree of their influence and spheres of influence on the interests of the Company, a Stakeholder Map is being developed¹.

32. When identifying stakeholders and interacting with them, the Company uses generally accepted international standards for identifying and interacting with stakeholders, such as the AA 1000 Accountability Principles Standard (2008), AA1000 Stakeholder Engagement Standard (2015), ISO 26000 Guidance on Social Responsibility, and Global Reporting Initiative standards.

The Company takes measures to establish dialogue and long-term cooperation with stakeholders.

The Company draws up a Stakeholder Map, taking into account risks and ranking them based on dependencies (direct or indirect), obligations, situation (paying special attention to high-risk areas), influence, and various (diverse) perspectives:

1) the area of authority and responsibility (Sole Shareholder, Corporate University Enterprises and other employers, Faculty, Administrative and managerial personnel, educational and support personnel and other university employees, Trade Union of Faculty and University Employees, Advanced Training Services);

2) the area of direct impact (consumers of educational services, applicants, students, master students, doctoral students), consumers of services in the field of scientific research, examination and consulting, state institutes, potential investors, local executive bodies, local communities, population in the places of activity, NGOs, the Government, state bodies, the Parliament, Maslikhats, editorial offices

¹ The Stakeholders' Map is approved within the framework of the Company's Risk Portfolio. The stakeholder influence is reassessed on an annual basis.

and editorial boards of scientific journals, state bodies, accreditation, rating, audit agencies);

3) the area of indirect impact (suppliers of a potential contingent of students, suppliers of material and technical resources and services, population, public organizations, mass media, etc.).

33. To communicate the sustainable development policy to stakeholders, the Internet resource of the Company and organizations contains a separate section dealing with this area of activity.

34. The Company and organizations discuss the inclusion and compliance with the principles and standards of sustainable development in the relevant contracts (agreements, contracts) with partners. The main forms of interaction with stakeholders are: joint programs and projects, memorandums of cooperation, joint working groups, activity reports, meetings, conferences, publications, interviews, internships, training, etc.

35. In the event that the Company or organization identifies a risk associated with partners having a negative impact on the economy, ecology and society, the Company and/or organization shall take measures aimed at stopping or preventing such impact.

In the event of a partner's failure to accept or to improperly implement the principles and standards of sustainable development, the importance of this partner for the Company and organization shall be taken into account, and whether there are measures to influence it and the possibility of replacing it.

8. MANAGING THE OWN ENVIRONMENTAL IMPACT

36. Due to the nature of its activities, the Company does not have a direct significant impact on the environment. The main resources consumed by the Company are electricity, heat and water.

37. The Company is considering the possibility of introducing a green office concept, an important component of which is an information campaign aimed at raising the level of environmental awareness of employees.

38. In its activities, the Company strives to reduce excess consumption of resources and minimize the existing negative environmental impact by introducing energy-efficient technologies, reducing water consumption, reducing paper consumption for office needs through the introduction of an electronic document management system.

39. The Company applies the principles and methods of rational use of resources that best ensure prevention of adverse impacts on the environment and strives to preserve natural resources in the territory of the University by increasing green spaces and implementing environmental activities.

40. The Company develops the University infrastructure facilities for the well-being of students, teachers and administrative staff, and also strives to improve the convenience of the campus for people with disabilities and special needs.

41. The Company uses energy-efficient appliances in its activities.

42. The Company implements a water conservation program, and the University also uses water-saving appliances.

43. The Company conducts training in the field of sustainable development, scientific research, events, and reports on sustainable development.

44. The Company evaluates the level and growth of publications in the field of SDGs in publications indexed in international scientometric databases.

45. The Company strives to participate in national and international projects on SDGs or ESG.

9. RESPONSIBLE LABOR PRACTICES

46. Employees are the main value and the main resource; the results of the Company's activities directly depend on the level of their professionalism and safety.

47. The Company builds labor relations with its employees based on the principle of legality and compliance with the generally recognized labor rights of employees.

48. In carrying out its activities, the Company is guided by the principle of providing equal opportunities and does not allow discriminating its employees in hiring, remuneration, access to training, promotion, dismissal on such grounds as gender, race, language, religious, political and other beliefs, citizenship, national or social origin, disabilities.

49. The Company takes measures to ensure correct organization of its employees' labor in the workplace and strives to form safe working conditions that meet the requirements of the legislation of the Republic of Kazakhstan in this area.

10. RESPONSIBLE BUSINESS PRACTICES

50. Zero tolerance for corruption is one of the principles of sustainable development.

Corruption destroys the value that the Company creates for the Sole Shareholder, investors, the other stakeholders and the Company as a whole; the Company declares zero tolerance for corruption in any of its manifestations.

51. Officials and employees involved in corruption cases are subject to dismissal and prosecution in accordance with the procedure established by law; internal control systems in the Company must include measures aimed at preventing, preventing and detecting corruption offenses; the Company develops a dialogue with stakeholders to raise their awareness in the fight against corruption.

The Company follows anti-corruption legislation, identifies corruption risks, implements and supports policies and practices that counteract corruption.

52. The Company raises awareness of its officials, employees and stakeholders in the matters of combating corruption.

53. The Company regularly conducts anti-corruption training for employees.

54. The Company has feedback mechanisms through which officials, employees and counterparties of the Company, as well as individuals and legal entities, can provide information of possible corruption offences committed by any official,

employee of the Company; official, employee, representative of a counterparty of the Company.

55. Officials and employees of the Company are responsible for making transparent, timely and adequate decisions free from conflicts of interest.

11. FINAL PROVISIONS

56. The Company strives to implement the provisions of this Policy in its activities.

57. The Company will improve this Policy taking into account changes in the legislation of the Republic of Kazakhstan and the emergence of new standards in the field of sustainable development in international and national practice guided by the interests of the Sole Shareholder, the Company and the other interested parties.

58. If, as a result of changes in legislation or the Charter, some provisions of the Policy come into conflict, these provisions of the Policy shall become invalid until the relevant changes are made.