



**APPROVED by**  
**Decision of the Board of Directors**  
**of Abylkas Saginov Karaganda**  
**Technical University NJSC**  
**dated April 30, 2026**  
**(Minutes No. 4/57)**

## **Regulations on the Ombudsman of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University**

### **1. General provisions**

1. These Regulations on the Ombudsman of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University (hereinafter referred to as the Regulations) have been developed in accordance with the legislation of the Republic of Kazakhstan, the Corporate Governance Code, the Charter, and internal documents of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University.

2. These Regulations define the tasks, the role, and functions, as well as the appointment procedure and remuneration conditions of the Ombudsman Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University.

3. The following key concepts and abbreviations are used in these Regulations:

1) Ombudsman is a person appointed by the Board of Directors of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University, whose role is to advise employees of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University who have approached him/her and to assist in resolving labor disputes, conflicts, problematic issues of a social and labor nature, as well as in ensuring that the Company's employees comply with the principles of business ethics;

2) Appeal is an individual or collective statement, complaint, message, request, or proposal from a Company employee, sent to the Ombudsman in writing, orally, electronically, by telephone, videoconference, or other accessible means on matters within the Ombudsman's competence;

3) Company is Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University;

4) Board of Directors is the Board of Directors of Non-profit Joint-stock Company Abylkas Saginov Karaganda Technical University;

5) Conflict of Interest is a situation in which the personal interest of the Ombudsman or the other persons can influence the objectivity of the consideration of an appeal and the preparation of recommendations;

6) KPIs are key performance indicators.

## **2. Procedure for the appointment and termination of the Ombudsman's powers**

4. The Ombudsman is appointed by a resolution of the Board of Directors and is subject to re-election every 2 (two) years.

The presence of candidates for appointment as Ombudsman at meetings of the Board of Directors is mandatory.

5. The Board of Directors determines the term of office and salary of the Ombudsman.

6. The Ombudsman function may not be combined with functions of other structural divisions of the Company.

7. The Ombudsman position shall be appointed to a person who meets the following requirements:

1) citizenship of the Republic of Kazakhstan;

2) higher (or postgraduate) professional education;

3) at least 5 (five) years of work experience, including at least 3 (three) years of practical experience in labor relations, conflict resolution, mediation, human resources management, law, corporate governance, or in a management position;

4) impeccable business reputation;

5) no outstanding or unexpunged criminal record;

6) the absence of a conflict of interest that could impact the independence and objectivity of the Ombudsman's performance of his or her functions.

8. In accordance with the decision of the Board of Directors, an employment contract is concluded with the Ombudsman, which is signed on behalf of the Company by Chairman of the Management Board, Rector.

9. The Board of Directors has the right to decide on the early termination of the Ombudsman's powers and the termination of his or her contract in accordance with the procedure established by law.

10. The decision to appoint a new Ombudsman can be made simultaneously with the decision to early terminate the powers of the current Ombudsman.

11. If the Board of Directors decides to terminate the powers of the Ombudsman, the Ombudsman shall, by deed, transfer the documents to the new Ombudsman or the Corporate Secretary for subsequent transfer to the newly appointed Ombudsman.

## **3. Principles, role, objectives, and functions of the Ombudsman**

12. The Ombudsman shall carry out his activities based on the principles of legality, independence, objectivity, impartiality, confidentiality, accessibility, respect for the rights and legitimate interests of employees, non-discrimination, and non-harassment of individuals for contacting the Ombudsman.

13. In performing his functions, the Ombudsman shall not replace the activities of the Company's bodies and officials, HR, legal, compliance, internal audit,

conciliation, and other authorized bodies, but shall act within their competence as an independent advisory and recommendatory body.

14. The Ombudsman shall not have the right to make decisions that, according to the legislation of the Republic of Kazakhstan, the Charter, and internal documents of the Company, fall within the competence of other bodies and officials of the Company.

15. An appeal to the Ombudsman cannot serve as grounds for worsening the employee's position, imposing disciplinary measures, discrimination, or other negative consequences.

16. The role of the Ombudsman is to consult with employees and parties to labor disputes or conflicts who have approached him/her, and to assist them in developing a mutually acceptable, constructive, and feasible solution, taking into account compliance with the legislation of the Republic of Kazakhstan (including maintaining confidentiality, where necessary), and to assist in resolving problematic social and labor issues of both employees and the Company.

17. The duties of the Ombudsman are as follows:

1) to promote compliance with the Code of Business Ethics by the bodies, officials, and employees of the Company and, where necessary, to explain its provisions;

2) to consider appeals from the Company employees on issues within the competence of the Ombudsman;

3) to assist the bodies and officials of the Company in handling appeals regarding illegal/inappropriate actions in the Company that violate the legislation of the Republic of Kazakhstan and/or the internal documents of the Company;

4) to assist the bodies and officials of the Company in preventing or resolving corporate conflicts and conflicts of interest.

18. The functions of the Company Ombudsman are as follows:

1) quarterly disseminating the information of business ethics, the role of the Ombudsman in the Company, and cases/situations in which the Ombudsman can be contacted, as well as the possibility of confidential/anonymous appeals to the Ombudsman;

2) monitoring the implementation and compliance of the Code of Business Ethics and internal documents aimed at its implementation by the Company's bodies and officials;

3) providing and organizing clarifications to the Company's officials and employees on issues related to the requirements of the Code of Business Ethics, including by organizing training seminars and workshops;

4) informing the Company's bodies and officials of identified violations in the area of business ethics;

5) participation in the development and periodic review of the Code of Business Ethics and the Company's internal documents aimed at its implementation;

6) monitoring and analyzing current practices, trends, and development prospects in the field of business ethics in the Republic of Kazakhstan and abroad,

and providing relevant analytical reports, information, and recommendations to the heads of structural divisions, officials, and bodies of the Company;

7) regular testing employees' knowledge of the provisions of the Code of Business Ethics and the Company's internal documents aimed at implementing it;

8) ensuring the collection of employee familiarization sheets with the requirements of the Code of Business Ethics, including in the event of amendments or additions to it;

9) compiling reports on compliance with the Code of Business Ethics and the Company's internal documents aimed at implementing it, conducting analysis, and providing recommendations to bodies, officials, and employees on the necessary measures to prevent violations of internal documents and mitigate reputational risks.

#### **4. Rights and obligations of the Ombudsman**

19. The Ombudsman shall have the right to:

1) request and receive, in accordance with the established procedure, from officials and structural divisions of the Company information and documents necessary for considering appeals and performing their functions, subject to the requirements of the legislation of the Republic of Kazakhstan on personal data, confidential, proprietary, and other legally protected information;

2) hold consultations, meetings, and discussions with employees and officials of the Company on matters within their competence;

3) engage, in agreement with the relevant managers, employees of the Company as experts or specialists to prepare opinions and proposals;

4) submit recommendations to the Board of Directors, the Management Board, and other authorized persons for improving social and labor relations, business ethics, and internal procedures;

5) attend meetings of the Board of Directors, its committees, and the Management Board when considering the issues within the Ombudsman's competence;

6) initiate consideration of systemic problems identified as a result of appeals;

7) exercise other rights necessary to perform the functions assigned to him.

20. The Ombudsman is obligated to:

1) comply with the norms and requirements of the legislation of the Republic of Kazakhstan, the Company Charter, these Regulations, and other internal documents of the Company in their activities;

2) ensure objectivity, impartiality, and confidentiality when considering appeals;

3) prevent the disclosure of information that becomes known to the Ombudsman in the performance of their functions, except in cases stipulated by the legislation of the Republic of Kazakhstan;

4) promptly consider appeals within their competence;

- 5) inform the Board of Directors of systemic problems, corporate conflicts, and other matters requiring consideration at its level;
- 6) inform the Board of Directors of the emergence of circumstances that could impact their independence, objectivity, or lead to a conflict of interest;
- 7) submit for consideration by the relevant bodies and officials of the Company and organizations any problematic issues identified by the Ombudsman that are systemic in nature and require appropriate decisions (comprehensive measures), and put forward constructive proposals for their resolution;
- 8) submit reports on their activities in the manner established by these Regulations.

## **5. Responsibility of the Ombudsman**

21. The Ombudsman shall be liable, in accordance with the legislation of the Republic of Kazakhstan, for the following:

- 1) violation of the requirements of the legislation of the Republic of Kazakhstan, these Regulations, and other internal documents of the Company;
- 2) disclosure of confidential information that became known to him/her in connection with the performance of his/her duties;
- 3) causing damage to the Company as a result of culpable actions or inactions;
- 4) improper performance of the functions and duties assigned to him/her.

## **6. Procedure for considering appeals**

22. Appeals to the Ombudsman can be submitted in writing, orally, electronically, by telephone, videoconferencing, or by other accessible means.

23. An appeal must contain sufficient information for its consideration, with the exception of anonymous appeals, if the information contained therein indicates possible violations that require a response.

24. The Ombudsman shall register received appeals or ensure their accounting in accordance with the procedure established by internal documents, while maintaining confidentiality.

25. The period for reviewing an appeal shall be no more than 15 (fifteen) business days from the date of its receipt. If additional information, consultations, or analysis of materials is necessary, the review period may be extended, but not more than to 30 (thirty) business days, of which the applicant shall be notified, if possible.

26. Based on the results of the appeal review, the Ombudsman shall:

- 1) provide an explanation to the applicant;
- 2) develop recommendations for the parties;
- 3) send recommendations to the relevant bodies or officials of the Company;
- 4) submit the systemic issue to the Company's authorized bodies for consideration;

5) discontinue consideration of the request if the issue is not within its competence or the request does not contain sufficient information for its consideration.

27. If the request is not within the Ombudsman's competence, the applicant is advised of the procedure for contacting the relevant structural unit or official of the Company, or another authorized body.

28. The Ombudsman does not consider requests:

1) on matters subject to consideration exclusively by the courts, law enforcement agencies, or other government agencies;

2) anonymous requests that do not contain specific information about possible violations;

3) requests for which there is no subject of consideration or no evidence of a violation of rights and legitimate interests;

4) requests the consideration of which is expressly referred to the competence of other bodies or officials of the Company.

29. Materials of appeals, information of applicants, and information received by the Ombudsman in the performance of their functions are confidential and are not subject to disclosure, except in cases stipulated by the legislation of the Republic of Kazakhstan and these Regulations.

30. Reports and information submitted by the Ombudsman to the Company's bodies are compiled in anonymized form, unless otherwise required by the legislation of the Republic of Kazakhstan or the nature of the matter under consideration.

## **7. Ombudsman's reporting**

31. The Company's Board of Directors approves the Ombudsman's annual work plan and KPIs, taking into account the specifics of the Ombudsman's functions, the need to uphold the principles of independence, confidentiality, and the inadmissibility of creating incentives to conceal complaints or formally reduce the number of conflicts.

32. The Ombudsman provides quarterly information to the Board of Directors of the results of his/her activities, the measures taken, the systemic issues identified, and the recommendations developed.

33. The Ombudsman submits a report on the results of his or her work to the Nomination and Remuneration Committee of the Company's Board of Directors at least once a year, and then forwards the report to the Board of Directors for review, which evaluates the Ombudsman's performance.

34. Based on the review of the report and the evaluation of the Ombudsman's performance, the Board of Directors decides to extend or terminate the Ombudsman's term of office and, if necessary, to adjust his or her work priorities and KPIs.

## **8. Terms of remuneration and bonuses for the Ombudsman**

35. The salary of the Company's Ombudsman shall be determined by the decision of the Board of Directors and reflected in the employment contract. The other compensatory, incentive, and/or reward payments shall be made in accordance with the legislation of the Republic of Kazakhstan, these Regulations, and the Company's internal documents.

36. When granting annual paid leave, the Ombudsman shall be paid a health benefit in the amount of one month's salary.

37. By decision of the Board of Directors, the Ombudsman can be paid a performance bonus for the reporting period, taking into account the assessment of his or her performance and the achievement of approved KPIs, in an amount not exceeding four salaries per calendar year, in the manner and under the conditions established by these Regulations and other internal documents of the Company.

38. In honor of the celebration of national, state, and professional holidays of the Republic of Kazakhstan, the Board of Directors can, by its decision, award a bonus to the Ombudsman through savings in the wage fund. The total annual amount of this bonus shall not exceed ten minimum wages established by the legislation of the Republic of Kazakhstan on the republican budget for the corresponding financial year.

39. The Ombudsman's bonus shall be awarded based on the decision of the Board of Directors and formalized by order of Chairman of the Management Board, Rector or the person acting in his/her capacity.