

 NAZARBAYEV UNIVERSITY	Autonomous organization of education Nazarbayev University		
	Approving body:	Managing Council	
Code of Ethics of the autonomous organization of education “Nazarbayev University”			
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Initiator:	I. Fazylbayev, General Manager, Department of Human Capital Development		
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1. Purpose

1. The Code of Ethics reflects the values and behavioral expectations of Nazarbayev University (hereafter – NU, the University) community members, regardless of their individual role, position or practice. The General provisions reflected in this Code apply not only to faculty and staff but also to the broader community including affiliated organizations, students, residents, family members and dependents, contractors and vendors working on University premises. It aims to assist members of the NU community to understand their ethical and behavioral responsibilities and to identify and resolve ethical issues that might arise over the course of their work and/or other affiliation with the University. This document also provides guidelines for reporting ethical issues and raising concerns about possible violations.

2. NU entrusts members of the NU community to represent the University, its mission and core values in a professional and ethical manner. Members of the NU community are expected to comply with this Code of Ethics in order to foster a healthy, respectful and ethical work environment that supports the best interests of the University and its community.

3. NU is a complex, and multicultural organization consisting of diverse population with different relationships to each other. Given the variety and



complexity of ethical questions that employees may during their time at the University, this Code can serve only as a general guide.

4. Provisions of this Code set out an overarching framework for personal integrity, conduct and ethical standards for the wider NU community. This Code is complemented and supported through other specific internal policies and procedures such as the Faculty Policies and Procedures, Student Code of Conduct and Disciplinary Procedures and the Policy and Procedure on Conflict of Interest, etc. NU community members should refer to this code as the broad guide and where appropriate refer to related policies for more information.

2. Definitions

5. Definitions and abbreviations used in the Code are as follows:

1) **Bribery** –offering, giving, accepting, or soliciting any item of value to influence the actions of the other person.

2) **Bullying** – is the exercise of power over another person through negative acts or behavior that undermine him or her personally and/or professionally. Bullying includes but is not limited to: threatening, insulting, abusive, disparaging or intimidating behavior which places inappropriate pressure on the recipient or has the effect of isolating or excluding them from fully participating in their professional activities.

3) **Conflict of interest** – a situation when there is a divergence between a staff member's private interests and his/her professional obligations to the University, such that an independent observer might reasonably question whether the staff member's actions or decisions are determined by considerations of personal gain, financial or otherwise. For the avoidance of doubt, any reference to a “conflict of interest” can refer to either an actual conflict of interest or potential conflict of interest;

4) **Disciplinary sanction** – measure of disciplinary effect applied by NU in relation to the member of NU community who has committed a disciplinary offence. If an ethics violation is found, the University can take formal disciplinary sanction against the member of NU community. Appropriate action can vary according to the Law of the Republic of Kazakhstan.

5) **Disciplinary committee** – standing collegial, advisory body established to consider materials of official investigation of facts related to members of NU community' disciplinary offense, and recommendations on the disciplinary measures to be taken.

6) **Discrimination** – is the unfair or prejudicial treatment of people based on their race, age, sexual orientation, gender, national or ethnic origin, marital status, family status or disability, religious beliefs, political opinions, etc. that is sufficiently serious to unreasonably interfere with or limit an individual's opportunity to



participate in or benefit from a University program or activity, or that otherwise adversely affects the condition of the individual's employment, housing, or affiliation with the University.

7) **Favoritism** - refers to the practice of giving unfair preferential treatment to one person or group at the expense of another.

8) **Gift** – a good, money in any currency, service and/or favor given to a member of the NU community.

9) **Monthly calculation index** - is an index set annually by Government of the Republic of Kazakhstan for calculating allowances and other social payments.

10) **Harassment** – is unwanted conduct, which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive working or learning environment. Harassing behaviors may include, but are not limited to, the following: conduct, whether verbal, physical, written, graphic, or electronic that threatens, intimidates, belittles, denigrates, or shows an aversion toward an individual or group; epithets, slurs, or negative stereotyping, jokes, or nicknames; written, printed, or graphic material that contains denigrating, or demeaning comments, or pictures; and the display of denigrating, or demeaning objects, e-mails, text messages, or pictures.

11) **Labor Code** –means the Labor Code of the Republic of Kazakhstan

12) **Nepotism** - is the unfair use of power in order to appoint relatives to desirable positions.

13) **NU community member** – any person who works at the University including, but not limited to: staff on an employment contract; individuals on civil law contracts; any other individuals acting on behalf of or at the request of the University.

14) **Stalking** –is intentionally and repeatedly following, contacting, or harassing another person and making an implied threat to subject the other person to serious bodily harm.

15) **University Unit** – a structural unit responsible for the oversight and management of compliance with this Code, managing conflicts of interest and ethics issues and authorized to review and manage the risks associated with the disclosed interests.

3. General provisions

6. NU recognizes the right of all members of the NU community to be treated with respect and dignity. NU is committed to fostering a fair and respectful work environment where NU community members feel safe to contribute, discuss and debate ideas in a constructive and open manner.



7. Members of the NU community should avoid any act of favoritism, nepotism, bribery, fraud, corruption, and other similar practices, which may prevent fair decision-making.

8. NU community members should refrain from engaging in any form of discrimination, intimidation, bullying, harassment, stalking, prejudgment, and illegal, dishonest, or unethical misconduct.

9. Those in positions of trust should exercise their authority fairly, appropriately and treat others in a courteous and respectful manner, without prejudice and bias.

10. Members of the NU community are expected to be respectful to their colleagues on the campus and outside the University.

11. At all times in the course of performing professional duties, members of the NU community should dress and comport themselves in a professional manner.

12. Members of the NU community should put equal efforts towards effective professional cooperation in the best interest of the University.

13. Examples of unacceptable behaviors include, but not limited to the following:

1) Aggressive communications, including the use of inappropriate, and/or offensive language (verbal or written);

2) verbal or written abuse isolation, deliberate exclusion, and/or non-cooperation at work;

3) derogatory name-calling and insults;

4) threats of a physical or psychological nature;

5) bullying behavior or language that causes fear or distress to others;

6) abuse of power by someone in a position of authority;

7) cyber bullying for example by the e-mail or the use of social networking sites to post derogatory messages or distribute confidential information about someone;

8) spreading malicious rumors or insulting someone;

9) fostering isolation or non-cooperation at work;

10) demeaning comments about a person's appearance;

11) taking credit for work done by others;

12) degrading/ humiliating someone in front of other people.

4. Anti-bribery Commitment

14. NU takes a zero-tolerance approach to offering and receiving bribes in any form. NU community members must conduct their work honestly preventing misuse of power for personal gain.

15. Members of the NU community must avoid and refuse any form of bribery or corrupt practices. There are two types of bribery offenses:



16. Bribing another person – offering, promising or giving financial or any other form of advantage to another person with the intention to motivate or reward them for inappropriate actions violating this Code, internal regulatory documents, or legislation of the Republic of Kazakhstan.

17. Receiving a bribe – by requesting, agreeing to receive, accepting financial or any other form of advantage from another person intending to conduct inappropriate actions violating this Code, internal regulatory documents or legislation of the Republic of Kazakhstan.

18. Members of the NU community are responsible for preventing, disclosing and reporting of any forms of bribery, and must avoid any activities that might lead to a breach of this Code. Failure to disclose witnessed cases of bribery can make a person an accomplice in illegal activity, even if he/she is not directly involved. In such cases a disciplinary sanction can also be applied to that person, depending on the circumstances and severity of the offense.

19. Both the person involved in bribery and the intermediary intentionally assisting, advising, or encouraging commitment of bribery are considered as accomplices in the offense of bribery and are subject to similar punishment.

20. NU community members should always consider whether offering or receiving gifts is appropriate and the intention behind the gift. Giving and receiving gifts is not prohibited, if all the following requirements are met:

- 1) The gift does not include cash or a cash equivalent.
- 2) The gift is given on behalf of the department/ university/group name, not in the personal name.
- 3) The gift is given openly, not secretly.
- 4) A gift that could not reasonably be viewed as influencing a person's decisions.
- 5) The value of a received or given gift should not exceed 4 monthly calculation indexes.

21. Gifts, which are worth more than 4 monthly calculation indexes, must be declined and returned, or reported to the University Unit.

22. NU will investigate any instance of suspected bribery or corruption. Disciplinary action against those involved in any actual case might lead to termination of employment and reporting to relevant regulatory and law enforcement authorities.

5. Data privacy and confidential information

23. Members of the NU community receive and produce various types of confidential and private information on behalf of the University. It is the responsibility of every member of the NU community to keep confidential information secure and prevent unauthorized access to this information.



24. Members of the NU community must not disclose confidential information regarding the University to outside parties or use it for personal gains. This applies to all financial, student admission and records, personnel, or other non-public information and e-mails. Disclosure and dissemination of confidential information might be considered a serious offense.

25. Exceeding one's authority as an NU community member trying to receive confidential information on student admission, financial, academic, or personnel matters on behalf of third parties or solicitation of the interests of the third parties is prohibited.

26. No NU community members, regardless of their position or seniority, should intervene in the admissions process. All information related to the admission process, including the ranking of candidates and interview results is strictly confidential and cannot be revealed to any third party.

27. The obligations regarding maintaining confidential information remain effective after the termination of relations with the University.

28. Confidentiality of documents and information and proper handling of such information is regulated by relevant internal documents of the NU.

29. NU strives to maintain privacy, security, and protection of any personal data of its community members and use it with consideration and ethical regard for others in accordance with legislation of the Republic of Kazakhstan and professional standards. Any personal data will be processed in a lawful and transparent manner in relation to the data subject.

30. Members of the NU community must report to IT services and/or University Unit if they identify leakage of confidential information regarding NU, members of the NU community, and any other suspicious forms of online behavior.

6. Safety and use of the university resources

31. The members of the NU community are expected to treat with due care the resources (facilities, equipment and supplies) and physical property of the University.

32. University facilities, equipment, and supplies shall not be used for purposes other than carrying out their professional responsibilities. Nonetheless, occasional personal use (for instance, printing station, stationary phone, etc.) is permitted as long as it does not damage the property, affect job performance, or cause disruption to the workplace.

33. All equipment, facilities, library materials, scientific collections, books, and other University property shall be in the immediate care of the respective departments to which such resources belong.



34. Members of NU community must ensure compliance with internal health and safety regulations. For more information please refer to Health and Safety Policy, Mandatory Medical Check-up Rules, Fire Safety Rules.

35. NU community members shall not be liable for ordinary wear and tear, capital devaluation, or damage that is not caused by the fault or negligence of the NU community members.

7. Plagiarism

36. Any research, survey, analysis conducted, or documents prepared by members of the NU community are based on the principles of honesty and integrity.

37. Members of the NU community do not execute any work if the ownership of the ideas, concepts, and solutions are not appropriately acknowledged.

38. No member of the NU community shall pass or attempt to pass as their own the work of any other member, or provide such work to be presented as that of someone else as a favor or exchange to a certain reward.

39. For more information on research integrity among faculty, please refer to Faculty Policies and Procedures.

8. Behavior standards outside working hours and off campus

40. No members of the NU community should use his/her official position for obtaining personal services and benefits both within and outside NU.

41. While acting or presenting views in public, an employee should clearly state that he/she acts in a personal capacity and does not represent the views of the University.

42. Members of the NU community may not use the University name and visual identity (logo), other than in the context of their work responsibilities at the University.

43. Members of the NU community shall conduct themselves graciously when in public, remaining mindful of their status as representatives of the University

44. Members of the NU community should refer to this document where appropriate the Standards of Academic Conduct in determining whether their behavior meets the moral and ethical standards of the University, and strive to exhibit this standard in their behavior.

45. Behavior by NU community members outside of the hours of employment and/or off campus can be grounds for disciplinary action if it is found that such conduct:

- 1) is criminal;
- 2) violation of the Labor Code;



- 3) gives rise to potential civil liability for the University;
- 4) causes reputational damage to the University that could lead to adverse impact on relations with important stakeholders;
- 5) substantially interferes with the University's performance of its mission and/or the NU community member's performance of his or her professional duties.

46. Clauses 40-45 of this section applies to NU students as well with regards to the standards of their behavior outside NU.

9. Social Media and Mass Media

47. When engaging with an audience on social media on behalf of the University and its Units, members of NU community represent Nazarbayev University, therefore, it is necessary to make sure that the content shared is carefully curated, as any ambiguity may be misunderstood, misinterpreted and taken out of context, and therefore, can negatively affect the reputation of the University.

48. While engaging with audience members on social media on behalf of the University or its Units, members of NU community should abstain from any sensitive topics discussions (e.g. politics, religion, social issues, etc.) unless this is the research interest or topic of the discussion, and refrain from making any personal remarks.

49. Every member of NU community should be mindful that his/her affiliation with NU has the ability to affect Nazarbayev University's reputation and public image. While expressing personal opinion on social media, it is important to clearly state (e.g. in bio/profile/when commenting) that these views do not reflect Nazarbayev University's official position.

50. Nazarbayev University respects its students, faculty and staff rights for freedom of expression and freedom of speech, therefore, every member of NU community has all rights to manage personal social media accounts as one sees fit, and Nazarbayev University will not be liable for any ramifications that these social media postings might entail. Please refer to Social Media Guidelines for further information. Anything that is available in open access on social media can be used by mass media, therefore, might be misinterpreted and taken out of context.

51. Every member of NU community should secure rights and permissions before sharing any copyrighted material, multimedia files, research findings, corporate documents and communications, or anything that can be considered as University proprietary information.

52. When approached by mass media representatives for any kind of media statement/comment/engagement, it is necessary to inform Schools/structural unit marketing specialists, and the Marketing and Media Outreach team about the request and follow the guidelines available on the internal website my.nu.edu.kz.



53. The clauses 46-51 of this section should apply to a broader NU community including students, faculty and staff, dependents and immediate family members and its organizations.

10. Third parties

54. Members of the NU community conducting any form of formalized cooperation with third parties must ensure compliance of third parties with this Code of Ethics by conducting due diligence analysis prior to entering into relations or by including relevant clauses to the contracts, memorandum of cooperation, or other relevant documents ensuring compliance.

55. Members of the NU community are responsible to treat carefully any form of relationship with third parties and its impact on NU's reputation in terms of conflict of interest, bribery, financial policy of NU, etc. For more detailed information regarding conflict of interest please refer to Policy and Procedure on Conflict of Interest.

56. Any form of academic collaboration including research funding or related agreements is subject to the regulation by internal regulatory documents.

57. The University Unit has a duty to inform the third parties about requirements of the Code of Ethics, including the parties with whom NU signs a memorandum of understanding and/or cooperation, and all suppliers of goods and services to NU.

11. Dealing with violations

58. The University Unit oversees the implementation and monitoring of this Code. The University Unit strives to ensure that problems identified are dealt with fairly and consistently. It is the duty of the University Unit to inform members of the NU community about grievance management procedures.

59. When raising the ethical violation issue the NU community member should think of the severity of the violation. Minor violations may be resolved by informal discussion with department or faculty/ staff, counseling with the line manager, or informal mediation. Where appropriate, the supervisor and his/her subordinate should make reasonable effort to resolve the matter. Should the issue involve the supervisor directly the community member may contact the University Unit as a first point of contact.

60. If a member of the NU community identifies that the violation is serious, he/she has a right to report an official complaint to the University Unit, through their supervisor or directly. NU faculty and students can report an official complaint to the



University Unit if the violation is not covered by the Faculty Policies and Procedures and Student Code of Conduct and Disciplinary Procedures.

61. All procedures or documents related to complaints will be processed by the University Unit with confidentiality and respect. Information regarding the complaint will only be shared with those who are involved in the resolution of the matter. Failure of the University Unit to protect the confidentiality and/or to respect the complainant is a violation of this Code.

62. The University Unit may conduct an independent investigation of the matter. It has the right to require and get access to all relevant information from the University's structural units and any member of the NU community. All investigations must be conducted in a confidential manner.

63. If the member of the NU community or University Unit define the case as a severe violation of the Code, internal regulatory documents, or legislation of the Republic of Kazakhstan, the University Unit must initiate a panel meeting of the Disciplinary Committee according to the timeline and steps reflected in the Labor Code or contact responsible law-enforcement authorities. It is the duty of the University Unit to inform members of the NU community about the right of NU community members to initiate panel meetings of the Disciplinary Committee.

64. If the member of the NU community or University Unit transfers the case to the Disciplinary Committee, the review process is managed by either the guidance set out in the Regulations of the Disciplinary Commission of NU, the Faculty Policies and Procedures or the Student Code of Conduct and Disciplinary Procedures outlining the process for managing disciplinary cases. The Disciplinary Committee(s) of NU must follow the principles and rules of this Code.

65. All members of the NU community should avoid any activities that might lead to a breach of this Code and are responsible for reporting any forms of violation of this Code. Nonetheless, false accusations or reporting for personal gain made with the intent of harming another person are a serious violation of this code may result in the accuser being subject to further investigation and disciplinary action.

66. The University will not permit any negative or adverse actions to be taken against any member of the NU community who in good faith reports a violation of this Code of Ethics.

67. No member of the NU Community shall retaliate against any individual or be subject to retaliation for exercising their rights under the provisions of this Code.

12. Conclusion

68. Once becoming part of the University, NU expects all members of the NU community to be an ambassador of the University. We have a responsibility to hold ourselves and each other to the high standards of personal integrity, conduct and ethical behavior described in this document. Responsibility for complying with the



Code of Ethics lies with each member of the NU community at all levels and must be taken seriously, in order to safeguard our reputation, achieve our ambitious goals and to foster a healthy, respectful and ethical work environment that supports the best interests of the University and its community.



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