

**POLICY ON THE ELIMINATION OF DISCRIMINATION
IN THE WORKPLACE OF THE NON-PROFIT JOINT-STOCK COMPANY
“KAZAKH AGROTECHNICAL RESEARCH UNIVERSITY NAMED AFTER S.
SEIFULLIN”**

1. Scope of Application

1. The Workplace Non-Discrimination Policy of the NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” (hereinafter – the Policy) defines a system of goals, principles, approaches, management mechanisms and effective use of personnel for the implementation of the University’s strategy and development.

The Policy applies to all employees of the NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” (hereinafter – NJSC “KATRU named after S. Seifullin”) who are in an employment relationship with the University.

2. This Policy shall be applied by all structural divisions of NJSC “KATRU named after S. Seifullin” and forms part of the internal regulatory documents (hereinafter – IRD).

2. Normative References

This Policy refers to the following regulatory legal acts:

- Constitution of the Republic of Kazakhstan;
- Civil Code of the Republic of Kazakhstan;
- Labour Code of the Republic of Kazakhstan;
- Law of the Republic of Kazakhstan “On Science and Technological Policy”;
- Law of the Republic of Kazakhstan “On Education”;
- Charter of the NJSC “Kazakh Agrotechnical Research University named after S.Seifullin”.

International Acts:

- Universal Declaration of Human Rights;
- Conventions of the International Labour Organization (ILO);
- UN Sustainable Development Goals (SDGs): the Policy supports SDG 8 (“Decent Work and Economic Growth”) and SDG 10 (“Reduced Inequalities”).

3. General Provisions

1. This Policy is developed to create and maintain an inclusive, fair, and discrimination-free environment for all employees of NJSC “KATRU named after S. Seifullin”.

1.1.2. The main objective of the Policy is to ensure equal opportunities and zero tolerance towards any form of discrimination and harassment, and to prevent their occurrence in all areas of activity of NJSC “KATRU named after S. Seifullin”.

3. Implementation of this Policy will contribute to preserving the University’s

human resource potential and ensuring the inflow of highly qualified specialists to NJSC “KATRU named after S. Seifullin”. Effective implementation will reduce personnel-related risks and positively affect the competitiveness of the University.

4. Definitions

The following basic terms are used in this Policy:

– **discrimination** – any violation, limitation, or preference of rights in the field of labour or education based on a characteristic unrelated to professional qualities, qualifications, academic performance, or work outcomes, resulting in damage or limiting equal opportunities;

– **direct discrimination** – any explicit action or rule that clearly differentiates between individuals on the basis of prohibited characteristics;

– **indirect discrimination** – applying a neutral rule, criterion, or practice that places individuals with certain characteristics at a disadvantage compared to others, unless objectively justified;

– **harassment** – any unwanted verbal, physical, or graphic behaviour intended to or resulting in humiliating, intimidating, offensive, or hostile conditions;

– **sexual harassment** – any unwanted behaviour of a sexual nature, including touching, sexual remarks, unsolicited advances, jokes, or requests, creating a hostile environment;

– **victimization (retaliation)** – any adverse treatment of a person who submitted a complaint of discrimination or harassment, or participated in its investigation;

– **reasonable accommodation** – necessary and appropriate modifications or adjustments that do not impose a disproportionate burden on NJSC “KATRU named after S. Seifullin” to ensure equal rights and opportunities for persons with disabilities or those with specific religious beliefs.

5. Principles

Equal Opportunity: ensuring equal conditions and opportunities for employment, education, development, and career advancement regardless of personal characteristics.

Zero Tolerance: strict prohibition and disciplinary consequences for any form of discrimination or harassment.

Confidentiality: maintaining strict confidentiality during the review of complaints, to the maximum extent possible without compromising investigation or disciplinary measures.

6. Prohibition of Discrimination and Types of Discrimination

1. General Prohibition

NJSC “KATRU named after S. Seifullin” strictly prohibits any form of discrimination, harassment, or victimization. All decisions and actions shall be based solely on professional qualities, qualifications, experience, competencies, and academic/work performance.

1. Prohibited Grounds for Discrimination

Discrimination is strictly prohibited on the following grounds:

- 1) sex and gender identity (including pregnancy and parental responsibilities);
- 2) age;
- 3) race, skin colour, nationality, ethnic or social origin;

- 4) religion, belief, or lack thereof;
- 5) sexual orientation;
- 6) disability and health status (including HIV status and mental health);
- 7) family or property status;
- 8) place of residence;
- 9) membership in trade unions or public associations;
- 10) political or other beliefs;
- 11) any other characteristics unrelated to professional or academic qualities.

2. Areas Where Discrimination Is Prohibited

Discrimination is prohibited in all activities of NJSC “KATRU named after S. Seifullin”, including:

- 1) recruitment and hiring;
- 2) training and development: access to professional development, internships, upskilling programs, and educational resources;
- 3) remuneration and benefits;
- 4) performance evaluation;
- 5) career advancement and appointments;
- 6) disciplinary sanctions and termination.

3. Prevention of Harassment

1. Definition of Harassment

Harassment is a form of discrimination and is prohibited by this Policy.

Harassment is defined as any unwanted behavior that creates a hostile, humiliating, or intimidating environment for another person. This may include:

- 1) Verbal: insults, threats, demeaning jokes, discriminatory remarks, ridicule, or unwanted comments about personal characteristics;
- 2) Physical: touching, pushing, gestures, blocking passage, or other actions that create an uncomfortable or threatening situation;
- 3) Visual/graphic: posting or displaying offensive images, drawings, written materials, including cyberbullying through electronic communication and social media.

2. Sexual Harassment

Sexual harassment is strictly prohibited and may take the following forms:

- 1) Quid pro quo: a direct or indirect attempt to condition employment, promotion, evaluation, or educational benefit on consent to sexual conduct;
- 2) Hostile environment: repeated unwanted sexual behavior that is reasonably perceived as offensive and creates a hostile environment.

3. Victimization (Retaliation)

Victimization is strictly prohibited. Retaliatory measures (such as dismissal, demotion, lowering of evaluation, or creating obstacles in work) may not be applied to employees who have filed a complaint in good faith, participated in an investigation, or acted as witnesses. Any act of victimization will be considered a serious violation of this Policy.

7. Roles and Responsibilities

1. Responsibilities of University Management:

- 1) ensure development, approval, and communication of the Policy to all

stakeholders;

2) allocate necessary resources for training and functioning of complaint mechanisms;

3) ensure objective and timely investigation of all violations.

2. Responsibilities of Heads of Structural Divisions:

1) monitor the work and learning environment, preventing conflicts and potential cases of discrimination;

2) promptly address any known cases of discrimination or harassment;

3) ensure that all employees and students interacting with the division are familiar with the Policy.

3. Responsibilities of Employees:

1) comply with the principles of equality, respect, and courtesy towards colleagues;

2) refrain from any actions that may be regarded as discrimination or harassment;

3) report any violations of the provisions of this Policy;

4) assist in the investigation by providing accurate and reliable information.

8. Mechanisms for Submitting and Reviewing Complaints

1. Complaint Submission Procedure

A person who has become a victim or witness of discrimination or harassment may submit a complaint through one of the following channels:

1) informal channel: a verbal report to the immediate supervisor (provided that the supervisor is not the respondent);

2) formal channel (preferred): a written or electronic complaint addressed to the management of the NJSC “KATRU named after S. Seifullin”;

3) anonymous channel: use of the “Hotline” or the trust box of the NJSC “KATRU named after S. Seifullin”.

The complaint must contain as much detail as possible: the nature of the violation, date, time, place, and the names of involved persons and witnesses.

2. Principles of Complaint Review

Complaints are reviewed based on the following principles:

1) confidentiality: ensuring maximum confidentiality of the information and the identities of the complainant, witnesses, and respondent during the investigation;

2) impartiality and objectivity: the investigation is conducted by an independent commission (if necessary), without bias;

3) timeliness: the review of the complaint must begin immediately, and the investigation period shall not exceed 15 working days from the date of registration (with the possibility of extension if justified).

2. Investigation Procedure

1) registration: the Administrative Department (office) registers the complaint, assigning a confidential number if necessary;

2) commission formation: in the case of a complex or serious complaint, a Conflict Resolution Commission is formed, consisting of representatives from various departments (Administrative Department, Legal Service, Anti-Corruption Compliance Service, etc.);

3) data collection: the Commission conducts interviews with the complainant,

respondent, and witnesses, and collects documents, electronic evidence, and other materials;

4) conclusion: the Commission prepares a conclusion containing established facts and recommendations regarding disciplinary measures;

5) decision-making: the management of the NJSC “KATRU named after S. Seifullin,” based on the Commission’s conclusion, makes a final decision on the application of measures, including protection of the complainant from victimization.

9. Incentives and Disciplinary Measures

1. Disciplinary Liability

Any person found to have committed discrimination, harassment, or victimization shall bear disciplinary responsibility in accordance with the Labour Code of the Republic of Kazakhstan and internal regulatory documents.

The application of disciplinary sanctions not provided for by the Labour Code and other laws of the Republic of Kazakhstan is not permitted.

2. Incentives

The management of the NJSC “KATRU named after S. Seifullin” encourages employees and departments that actively:

- 1) implement inclusive practices in the workplace and in the educational process;
- 2) take initiative in organizing training activities on issues of equality and diversity;
- 3) successfully demonstrate exemplary behavior in accordance with the principles of this Policy.

10. Final Provisions

1. This Policy of the NJSC “KATRU named after S. Seifullin” shall be amended in the event of changes or additions to the internal regulatory documents of the NJSC “KATRU named after S. Seifullin” and shall come into force upon approval by the decision of the Board of the NJSC “KATRU named after S. Seifullin.”

2. Amendments and additions may be made to this Policy as necessary.

11. Responsibilities and Authorities

1. The Administrative Department is responsible for developing the Policy and its content; the Committee for Quality and Risk Management (CQRM) is responsible for its formatting, approval, and implementation.

2. The head of CQRM is responsible for ensuring the safekeeping of IRD, preventing unauthorized copying, and protecting confidential information.

3. The draft Policy must be coordinated with the Member of the Management Board – Vice-Rector for Operations, the Director of the Legal Service, the Director of the Administrative Department, and the Head of CQRM.

4. The final version of the Policy shall be approved by the decision of the Management Board of NJSC “KATRU named after S. Seifullin”.

12. Abbreviations and Acronyms

This Policy uses the following key terms and abbreviations and their definitions:

- NJSC “KATRU named after S. Seifullin” – Non-Profit Joint-Stock Company “Kazakh Agrotechnical Research University named after S. Seifullin”;
- HR Policy – Human Resources Policy of the NJSC “Kazakh Agrotechnical Research University named after S. Seifullin”;
- AD – Administrative Department;
- LS – Legal Service;
- QRM Committee – Committee on Quality and Risk Management;
- IRD – Internal Regulatory Documents.

13. Document Developers

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