

**POLICY OF THE NON-PROFIT JOINT-STOCK COMPANY “KAZAKH
AGROTECHNICAL RESEARCH UNIVERSITY NAMED AFTER S.
SEIFULLIN” ON COUNTERING FORCED LABOR, MODERN SLAVERY,
HUMAN TRAFFICKING AND CHILD LABOR**

1. Scope of Application

1. The Policy on Countering Forced Labor, Modern Slavery, Human Trafficking and Child Labor of the “Kazakh Agrotechnical Research University named after S.Seifullin” (hereinafter – the Policy) establishes the principles, rules and procedures concerning the full prohibition and active prevention of forced labor, modern slavery, human trafficking and child labor in all areas of its activities.

The Policy applies to all employees and learners who are in labor relations with the NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” (hereinafter – NJSC “KATRU named after S. Seifullin”).

2. This Policy is applied by all structural units of NJSC “KATRU named after S. Seifullin” and is included in the list of internal regulatory documents (hereinafter – IRD).

2. Normative References

This Policy refers to the following legal and regulatory acts:

- Constitution of the Republic of Kazakhstan;
- Civil Code of the Republic of Kazakhstan;
- Labor 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;
- International Labour Organization (ILO) Conventions;
- UN Convention on the Rights of the Child;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol).

3. General Provisions

1. Purpose and Objectives of the Policy

1.2. The purpose of this Policy is to ensure compliance with the highest standards of ethics and human rights, to protect the dignity of all employees engaged in labor relations with NJSC “Kazakh Agrotechnical Research University named after S. Seifullin,” and to eliminate all forms of labor exploitation.

1.3. The objectives of the Policy include:

- establishing “zero tolerance” toward any forms of exploitation;
- establishing due diligence procedures to identify and assess risks related to forced and child labor;
- ensuring mechanisms for reporting and investigating violations;
- integrating the principles of anti-exploitation into the educational process, research, administrative activities and human resources management.

1.4. The Policy applies to all operational activities of NJSC “KATRU named after S. Seifullin,” including:

- recruitment and employment procedures;
- scientific research activities;
- interaction with governmental and international organizations.

4. Definitions

The main terms used in the Policy:

- **forced labor** – any work or service extracted from any person under the threat of any penalty and for which the person has not offered themselves voluntarily;
- **modern slavery** – a set of practices in which a person is deprived of freedom and exploited, including bonded labor, forced marriage, debt bondage, human trafficking;
- **human trafficking** – recruitment, transportation, transfer, harboring or receipt of persons by means of threat, force, coercion or other forms of pressure for the purpose of exploitation;
- **child labor** – labor that deprives children of their childhood, potential and dignity, and is harmful to physical and mental development. It is defined as labor performed by persons below the minimum age of employment established by the legislation of the Republic of Kazakhstan.

5. Principles and Commitments

1. Zero Tolerance Principle

NJSC “Kazakh Agrotechnical Research University named after S. Seifullin” declares **absolute and zero tolerance** for any forms of forced labor, modern slavery, human trafficking, and child labor. This means that any confirmed violation committed by an employee, student, or contractor results in immediate and strict disciplinary, administrative, and/or legal consequences.

2. Obligations of the Management of NJSC “Kazakh Agrotechnical Research University named after S. Seifullin”

The management of NJSC “KATRU named after S. Seifullin” undertakes to:

- ensure the availability of necessary resources for implementation, monitoring and periodic review of the Policy;
- regularly communicate information about the Policy to all stakeholders.

3. Integration into the activities of NJSC “KATRU named after S. Seifullin”:

3.1. NJSC “KATRU named after S. Seifullin” undertakes to integrate the Policy requirements into key processes:

- **human resources management:** recruitment procedures, employment contracts and internal regulations must explicitly exclude any form of coercion;
- **procurement:** all procurement procedures and contracts with contractors must include mandatory clauses on compliance with this Policy;
- **education:** human rights and anti-exploitation principles must be incorporated into relevant academic courses and training programs.

6. Prevention of Forced Labor and Modern Slavery in Operational Activities

1. Human Resources Policy and Working Conditions

1.1. **Voluntariness and awareness:** employment at NJSC “KATRU named after S. Seifullin” is strictly voluntary. All candidates and employees must be fully informed about their rights, obligations, working conditions and remuneration before signing the employment contract.

1.2. **Employment contract:** each employee signs a written employment contract in accordance with the legislation, specifying conditions, duration and remuneration. A copy of the contract must be provided to the employee.

1.3. **Remuneration:** wages must be paid regularly and on time. Remuneration must not be below the legally established minimum. Unauthorized or excessive payroll deductions are prohibited.

1.4. **Prohibition of recruitment fees:** NJSC “KATRU named after S. Seifullin” and its representatives do not charge candidates any fees for employment and do not require deposits or guarantees as a condition of hiring.

1.5. **Personal documents:** employees retain free access to their personal documents (passports, IDs, work permits). NJSC “KATRU named after S. Seifullin” may not confiscate or retain these documents.

1.6. **Freedom of movement and termination:** employees have the right to leave the workplace after working hours and may terminate their employment in accordance with legal procedures without threat of punishment or coercion.

2. Due Diligence in the Supply Chain

2.1. NJSC “Kazakh Agrotechnical Research University named after S. Seifullin” applies a risk-based **due diligence** procedure to all significant counterparties and suppliers, especially those providing labor (security, construction) or goods from regions with a high risk of labor exploitation.

2.2. Inclusion of obligations in contracts: All contracts with counterparties must include the following mandatory provisions:

- a direct obligation of the counterparty to comply with this Policy and laws regarding forced and child labor;

- the right of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” to conduct or initiate independent audits at the counterparty’s facilities if necessary;

- immediate termination of the contract without penalties for NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” in the event of confirmed cases of forced or child labor by the counterparty or its subcontractors.

2.3. Monitoring: NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” may conduct periodic monitoring, request declarations of compliance with ethical standards, and require counterparties to provide evidence of adherence to the labor legislation of the Republic of Kazakhstan.

7. Prohibition and Prevention of Child Labor

1. Age Verification

1.1. NJSC “KATRU named after S. Seifullin” sets **the minimum employment age** at or above the level required by national law and depending on the nature of work.

1.2. The Administrative Department is obliged to carry out mandatory age verification upon hiring by checking the originals of identity and age documents.

1.3. In the case of organizing **student practice or internships** for individuals under the age of majority, NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” strictly complies with all restrictions and requirements of the labor legislation of the Republic of Kazakhstan regarding working hours, working conditions, and the nature of the tasks performed, and obtains written consent from parents/guardians.

2. Actions in Case of Detection of Child Labor

If child labor is detected in internal operations or among contractors, NJSC “KATRU named after S. Seifullin” immediately:

- ensures the immediate cessation of the child’s work activity;
- notifies competent state authorities;
- develops a corrective plan to support the child (return to education, welfare support);
- applies strict measures to responsible individuals or contractors.

8. Mechanisms for Identifying and Reporting Violations (WHISTLEBLOWING)

1. Procedure for Reporting Violations

1.1. NJSC “Kazakh Agrotechnical Research University named after S.Seifullin”

ensures the availability of effective and accessible channels for confidential reporting of any suspicions or confirmed cases related to forced labor, modern slavery, human trafficking, or child labor.

1.2. **Reporting Channels (Hotline):** Reports may be submitted through:

– **Administrative Department (administrative office)** in person, in writing, or by email;

– anonymous hotline or trust box of NJSC “KATRU named after S. Seifullin”.

1.3. **“Speak Without Fear” Principle:** Reports may be submitted by employees, students, counterparties, or any third party. Providing direct evidence is not required; a well-founded suspicion is sufficient.

2. **Whistleblower Protection**

2.1. NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” guarantees **full protection** against any retaliatory actions (dismissal, demotion, threats, harassment) for any person who has reported a possible violation of the Policy in good faith.

2.2. Any retaliatory actions against the reporter, even if the report is not confirmed but was made in good faith, will be considered a serious violation of this Policy and will result in disciplinary measures.

2.3. The reporter’s identifying information is kept strictly confidential and may only be disclosed within the framework of an official investigation and with the consent of the reporter or as required by the legislation of the Republic of Kazakhstan.

9. **Response, Investigation and Corrective Actions**

1. **Investigation Procedure**

1.1. All reports of violations are registered and immediately forwarded to the Ant Corruption Compliance Service for investigation.

1.2. Investigations are conducted impartially, objectively, and within established timeframes. Persons conducting the investigation must be independent of the alleged violators.

1.3. Upon confirmation of forced labor, human trafficking, or child labor, NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” immediately notifies law enforcement agencies and other authorized state bodies.

2. **Disciplinary and Legal Measures**

2.1. **Employees:** Strict disciplinary measures are applied to individuals found guilty of violating this Policy in accordance with the Labor Code of the Republic of Kazakhstan. NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” also facilitates the prosecution of responsible parties under administrative or criminal law.

2.2. **Contractors:** if violations are confirmed, NJSC “KATRU named after S. Seifullin” immediately:

– suspends or terminates cooperation;

- requires corrective actions;
- blacklists the contractor.

3. Corrective Actions and Compensation

NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” undertakes to take measures to compensate victims (e.g., assisting with return home, providing access to medical, psychological, and legal support, restoring documents), acting in accordance with the principles of social responsibility and international law.

10. Final Provisions

1. This Policy of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” is subject to amendment in the event of changes or additions to the internal regulatory documents of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” and comes into effect upon approval by the Board of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin.”
2. Amendments and additions may be made to this Policy as necessary.

11. Responsibilities and Authorities

1. The Administrative Department (AD) is responsible for the development of the Policy, specifically its content, while the Committee for Quality and Risk Management (CQR) is responsible for its drafting, approval, and implementation.
2. The Head of the Committee for Quality and Risk Management (CQR) is responsible for the safekeeping, prevention of unauthorized copying of internal regulatory documents (IRD) within the department, and non-disclosure of official information.
3. The draft Policy must be coordinated with the Board Member – Vice-Rector for Operational Activities, the Director of the Legal Service (LS), the Director of the AD, and the Head of the CQR.
4. The decision on the final version of the Policy is made by the Board of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin.”

12. Abbreviations

The following key terms and abbreviations, along with their definitions, are used in this Policy:

- NJSC “Kazakh Agrotechnical Research University named after S.Seifullin” – Non-Profit Joint-Stock Company “Kazakh Agrotechnical Research University named after S.Seifullin”;
- HR Policy – Human Resources Policy of NJSC “Kazakh Agrotechnical Research University named after S.Seifullin”;
- AD – Administrative Department;

- LS – Legal Service;
- CQR – Committee for Quality and Risk Management;
- IRD – Internal Regulatory Documents.

13. Document Developers

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