

**Approved
by the decision of
AEO "Nazarbayev Intellectual Schools"
July 13, 2012 (Protocol № 29)**

**Code of Ethics
AEO "Nazarbayev Intellectual Schools"**

Introduction

The basis for the success of AOE "Nazarbayev Intellectual Schools" (in after - AOE) are incorporate values and standards, which are to ensure the public trust and respect of partners, representatives of the government and all those whom the success of the AOE and its prosperity dependson. Values cause in workers of the AOE the sense of pride and the desire to achieve the best results in their work.

To achieve these goals, AOE focuses attention on organizational culture, and its important tool is the Code of Ethics, as the tasks require all AOE employees:

- Are aware of the mission of AOE, the achievement principles and follow them;
- Adhere to the standards of organizational culture of AOE and understand the importance of corporate reputation;
- Understand the importance and compliance of their actions according to the mission of AOE and accepted principles of morality.

This Code is a guide for all employees of AOE regardless of the position and is considered necessary that every employee, having carefully studied the Code, sought to ensure to follow all its requirements.

Adherence to the Code contributes to the formation and development of a positive organizational culture, leading to consolidation of power and authority of the AOE and it is a key to the successful development in the future.

The Code of Ethics of AOE fixed all values and ethical principles, established common standards of conduct on which the work of AOE based.

Corporate ethics is a key element in bringing together workers into a single social organism. The clear understanding of the moral values is essential for coordinated work of all departments. Commitment to the highest ethical standards will help to maintain and build confidence in the team and in the relations with external partners, the community and the State.

Compliance with the Code of Ethics will be a major step in strengthening the reputation of AOE today and ensure sustainable development in the future, will help employees to achieve common goals. The success of AOE depends on each of its employee. That is why the exact adherence to the Code of Ethics should be the top priority for all employees of AOE.

The Code Mission.

Following ethical standards in order to promote the development of AOE.

The Code Vision.

Improve efficiency of governance and interaction with stakeholders.

Chapter 1. General provisions

1. This Code was developed in accordance with the legislation of the Republic of Kazakhstan, the Charter and other internal documents of AOE, and establishes the fundamental values and principles of business ethics and ethical standards for business relationships.

2. The aim of the Code is:

- 1) reinforcement of key values, principles, rules and standards of business behavior and ethics, that guide all officers and employees of AOE in their actions both in making strategic decisions, and in everyday situations;
 - 2) Development of a common organizational culture based on high ethical standards, maintaining a team atmosphere of trust, mutual respect and integrity;
 - 3) A common understanding and implementation of ethics standards, adopted in AOE by all employees, regardless of the position held;
 - 4) Improving and maintaining confidence to the AOE from the business community, strengthening the power of open and honest organization;
 - 5) Promoting effective communication with stakeholders.
- 3.**The Code is used in conjunction with other internal documents and reflects the actions of officers and employees of the AOE application of the rules and principles of business ethics and business behavior.
- 4.**The list of rules and principles is not exhaustive and may be updated, modified, supplemented in the case of certain conditions or circumstances.
- 5.** Provisions of the Code apply to all officials and employees of AOE, regardless of the position held;
- 6.**The Code includes the following definitions:
- 1) Business Ethics - a set of ethical principles and standards of business communication, which govern the AOE officers and employees in their actions.
 - 2) The officer - a member of the Board, Managing Director;
 - 3) The employee - a natural person who is employed by the AOE, regardless of their status or position;
 - 4) The stakeholders - physical and legal persons entering into a legal relationship with the AOE;
 - 5) The Code - the Code of ethics of Autonomous Organization of Education "Nazarbayev Intellectual Schools";
 - 6) Conflict of interest - a situation in which the personal interest of the official or employee of AOE affects or could affect the impartial performance of their duties;
 - 7) Organizational culture - is specific to AOE values, principles, norms of behavior and attitudes;
 - 8) Company Secretary - AOE employee who is not a member of Board of Trustees or the Board of AOE, which is scheduled by the Board of Trustees of AOE, as well as in its activity controls the preparation and conduct the meetings of the Board of Trustees of AOE provides forming materials on the issue for consideration by the Supreme Board of Trustees and the Board of Trustees of AOE, maintains the control over providing access to them;
 - 9) Corporate Social Responsibility - execution voluntarily accepted obligations that meet the mutual interests of the AOE, the State and society.
- 7.** AOE accepts and follows the provisions of this Code in relationships with other organizations, government agencies, partners, and other stakeholders, as to make strategic business decisions, and in everyday situations.
- 10) the corporate secretary - the worker of AEO who is not the member of the Board of trustees or board of AEO who is appointed by the Board of trustees of AEO and is accountable to it, and also within the activity supervises preparation and carrying out meetings of the Board of trustees of AEO, provides formation of materials on questions submitted for consideration of the Highest Board of trustees and Trustee AEO, conducts control of ensuring access to them;
 - 11) Corporative social responsibility - implementation of the obligations voluntary taken up which are equitable to mutual interests of AEO, the state and society.
 - 12) AEO accepts and follows provisions of the present code in relationship with the affiliated organizations, state authorities, partners, other interested persons, both for adoption of strategically important business decisions, and in daily situations.

Chapter 2. Values and principles of corporate ethics

8. Fundamental corporate values on the basis of which, the work of AEO is based, are:

1) Competence and professionalism

First of all the result of work of AEO should be faultless from the professional point of view. Officials, workers of AEO should possess quality education, experience, ability to make the weighed and crucial decisions. AEO not only puts tasks, but also creates conditions for the workers, allowing raising level of professional knowledge and skills, to realize the professional, creative abilities, to develop potential, to have prospect of career growth.

- AEO appreciates in workers and their work;
- an orientation on achievement of strategic objectives of AEO;
- professionalism in the activity and aspiration to raise the professional level;
- initiative and activity at execution of functions;
- discipline and responsibility;
- mutual support between workers rendering of assistance to young specialists of AEO and respect of his veterans

2) Honesty and impartiality

Honesty and impartiality - the base of activity of AEO, its business reputation. AEO doesn't allow the conflict between personal interests and professional activity.

Deception, concealing and false statements aren't compatible to the status of the official, AEO, of the worker.

3) Responsibility

Responsibility - a quality assurance of activity of AEO. AEO is responsible for the taken obligations established by requirements.

4) Openness (Communitability)

AEO seeks for transparency and reliability of the information about AEO, services and achievements, results. AEO will inform the Supreme Council of Trustees and the board of trustees and partners about the situation, increase transparency and accessibility of information on the basis of improving the quality of reporting and accounting in accordance with the laws of the Republic of Kazakhstan. AEO also monitors the disclosure of the information and data which is commercial and other secrets protected by the laws of the Republic of Kazakhstan.

5) Respect of personality (dignity)

Employees and partners of AEO have the right to fair and equitable treatment, regardless of race, language, political or religious beliefs, sex, nationality and culture.

6) Patriotism

Imposed on an AEO high credibility with the state and its social responsibility leading to a feeling of patriotism and desire to contribute to the development of the national economy and to maximize the benefits for the state.

9. In carrying out their activities employees of AEO:

- Comply with applicable laws of the Republic of Kazakhstan
- Implement the decisions of the Supreme Board of Trustees and the Board of Trustees, and other documents relating to the activities of AEO
- Ensure the observance and respect for human rights, honor and dignity of a person and citizen, regardless of their origin, social, property status, sex, race, nationality, language, religion, beliefs, place of residence or any other circumstances
- Treat with respect the state symbols - Flag, Anthem and National Emblem
- Treat with respect the corporate logo of the AEO

- Comply with generally accepted moral and ethical standards, respect for state and other languages, and customs of all nations
- Act fairly and in good faith, do not accept bribes and similar evil business practices, and the practice of giving and receiving gifts, except for the adoption in business (such gifts should not be significant and should not be present frequently)
- Relate to colleagues fairly, with respect and ethical
- Strive to ensure that all of its relationships with stakeholders are mutually
- Show respect and preserve the environment.

10. Effective organization of work is based on respect for mutual rights between AEO and all interested parties. Compliance with reciprocal rights is a necessary condition for constructive work.

Chapter 3. Corporate ethics

3.1. Corporate ethics of relations between officials and employees.

11. Officials and employees of AEO take responsibilities for performing professional duties with good faith and reasonably with the interest of AEO by avoiding conflicts.

12. To achieve strategic objectives AEO officials make business decisions based on the fundamental values and principles of conduct, and take the responsibility for following in accordance with the legislation of the Republic of Kazakhstan and the internal legal AEO documents for implementation of the tasks assigned to them.

13. Officials and employees, in the performance of AEO duties, have to go by the specific interests of AEO, not personal relationships or personal benefits.

14. Every employee is required faithfully to follow the principles set out in the Code, to comply with the requirements of labor and collective agreements, work rules, job descriptions, and other internal documents of AEO and they have to be aware of their personal responsibility for their violation or non-compliance.

15. When hiring new employees AEO goes by the laws of the Republic of Kazakhstan and the requirements of the internal acts of AEO; it prefers candidates with high qualifications and work experience and does not allow any discrimination on whatever backgrounds. Selection and promotion of personnel is carried out only on the basis of their professional skills, knowledge and skills according to the internal acts of AEO, excluding any discrimination based on sex, race, political, religious and other similar reasons.

16. AEO encourages employees who wish to improve self-education and professional development, and creates equal and optimal conditions for training of employees at all levels.

17. Policy in remuneration is based on the recognition of professional qualifications and skills of employees, the results of their work and the achievement of key performance indicators and on offer of social benefits to motivate according to internal documents of the AEO.

18. AEO policy in health and safety provides the continuous improvement of health and safety for its employees.

19. Officials and employees of AEO have to contribute to a stable and positive atmosphere in the team with their attitude to work and behaviour.

20. Provision of any of the privileges and benefits to certain officials and employees of the AEO is allowed only on the basis of the legislation of the Republic of Kazakhstan and / or internal documents AEO with mandatory provision of equal opportunities for all.
21. Officials and employees of AEO should make all effort to highly professional work, be careful with the property of AEO, and use it efficiently and effectively.
22. AEO is responsible for making decisions and avoiding a conflict of interest at any stage of the process from the management to any employee who makes a decision.
23. Officials and employees must behave in order to avoid a situation in which the possibility of conflict of interest either with respect to oneself (or a related persons) or in relation to others.
24. Employees must promptly inform the superior or superiors and refuse to participate in the discussion and voting with the issues about the decisions, which touches upon their interest.
25. Officials and employees promptly provide each other with accurate information, without breaking the rules of confidentiality according to the laws of the Republic of Kazakhstan, as well as internal documents of the AEO.
26. Officials and employees in due time provide each other reliable information without violation of standards of confidentiality and taking into account the legislation of the Republic of Kazakhstan, and also the AEO internal documents.
27. Decision-making by officials should be based on transparency and adequacy principles.
28. Officials and employees are obliged to report immediately about any commercial or other interest (direct or indirect) in transactions, contracts, the projects connected with AEO or in connection with other questions in an order, provided by the AEO internal documents.
29. Officials, employees regardless of their status and a position haven't the right to take for execution of the functional duties: compensation in the form of money, services and in other forms from the organizations and individuals in whom they don't carry out the corresponding functions;
gifts or services from the persons dependent on them on work, except for symbolical signs of attention and symbolical souvenirs according to the standards of politeness and hospitality or at carrying out other official events.
30. Officials and employees are forbidden to disclose commercial, office and other secret protected by the legislation, except for cases when the requirement about providing this information is established by the legislation of the Republic of Kazakhstan, and also to trade on information.
31. Officials, employees must follow the rules, terms and procedures provided internal documents AEO.
32. Each employee shall not be allowed for colleagues and partners discrimination based on gender, age, race, political, religious, and other similar features.
33. Any situation that leads to a violation of the rights of employees must be considered in relation with the legislation of the Republic of Kazakhstan
34. Officials, employees should avoid public appearances, speeches and interviews on any topic from the behalf of AEO without direct debit or direct leadership AEO empowerment.
35. AEO officials, heads of departments at all levels should make management decisions relevant requirements of the Code, in fact should strive by example to show commitment to the provisions of the Code, to spend time counseling and mentoring, team building a team, united by a common mission, values and principles.

3.2. Corporate ethics of relationship of governing bodies.

The vision of the Supreme Board of Trustees is the core strategy of AEO, for the development and implementation of a responsible government.

36. System of relations between the Supreme Board of Trustees, the Board of Trustees and the Board established in accordance with the laws of the Republic of Kazakhstan, the Charter and internal documents of the AEO.

37. Procedure for the exchange of information between the Board, the Board of Trustees and the University Board of Trustees, is regulated by law, the Charter and internal documents of the AEO.

3.3. Corporate ethics of relationships with government agencies

38. AEO provides relationships with government agencies, in accordance with the laws of the Republic of Kazakhstan, the Charter and internal documents of the AEO, based on arm's length. AEO does not allow to achieve their goals improper attempts to influence government decisions.

39. AEO is committed to preventing corruption and other illegal acts on the part of public authorities, and by the proper officials and employees of AEO.

3.4 Corporate ethics of relationships with branches, representatives and organizations.

40. AEO provides relationship with branches, representative offices and subsidiaries in accordance with the law, the Charter and internal documents, statutes and regulations of branches, representative offices and subsidiaries.

3.5 Corporate ethics of relationships with business partners

41. AEO interacts with business partners on the basis of mutual benefit, transparency and full responsibility for its obligations under the terms of the contracts and other agreements.

42. AEO complies with the terms of contracts /agreements with business partners and keeps its obligations to them.

43. AEO will ensure timely and full consideration of all requests, suggestions and complaints of partners. In case of differences and disputes, complaints should be dealt with in a professional manner, with the aim of reaching an amicable conclusion.

44. AEO has the choice of suppliers of goods and services offered by the lowest price, best quality, delivery terms of goods, services, and of good reputation in accordance with the laws of the Republic of Kazakhstan.

45. AEO holds fair and free competition, and condemns all manifestations of unfair competition, which can not only negatively affect the reputation, but also undermine the confidence of the partners to the AEO. AEO, in turn, expects a fair competition from their partners.

46. AEO does not allow in its presentation of the business partners unwarranted benefits and privileges.

3.6 Corporate ethics of relationship with the public

47. AEO is aware of its social responsibility to the community.

48. AEO strives to have a positive impact on the solution of social problems.

49. AEO sees itself as an integral part of the social environment in which it operates and which it seeks to build a strong relationship based on respect, trust, honesty and fairness.

50. AEO aspires to create new workplaces and to increase professional qualification of workers.

51. AEO seeks to establish positive relationships with organizations (public, non-governments and others) in order to improve public relations, reduce the impact of its operations on the environment, protect the health and safety of AEO workers.

52. Autonomous Educational Organization (AEO) assumes the obligation to refuse from cooperation with legal entities and individuals with doubtful reputation.

53. Social responsibility is carried out in a framework the legislation of RK, the Charter and the AEO internal documents.

3.7. Corporate ethics of relationship with mass media

54. Information policy provides creation of possibility of receiving free and easy access to information about AEO. On corporate website AEO (<http://www.nis.edu.kz>) is placed general available mode information about AEO, its activity, corporate governance and the affiliated organizations, a contact information etc.

55. AEO watches observance of high standards in interaction with mass media.

56. The data concerning activity of AEO has the right to represent to mass media a management of AEO.

57. The workers of AEO providing data to mass media bear personal responsibility for their reliability and lack in them of the data making a trade secret, and also data of confidential character.

58. Workers of AEO can provide information to the mass media, concerning activities of AEO for an assignment or with the permission of the management of AEO and in coordination with the supervising structural division bearing responsibility for cooperation with mass media.

59. Each worker should understand and always remember that any stated to them as the worker of AEO, the point of view or spread information directly corresponds with AEO, its image and influences on its reputation in business community.

Chapter 4. Behavior rules in AEO

4.1. The relations with colleagues

61. The relations between all workers of AEO are equal in rights.

62. The relations in collective influence on mood of workers and their desire to work, in many respects define result of work. Creating and supporting a comfortable working situation, workers observe the following norms and rules of business etiquette:

- to be respectable to each other;
- in working hours not to be engaged in the affairs which have not been connected with performance of official duties;
- not to show to colleagues the bad mood;
- not to talk smut, not to show an aggression;
- always to apologize for the incorrect behavior;
- to help colleagues, to impart experience knowledge and experience;
- not to discuss personal or professional qualities of colleagues in their absence;
- to be polite and correct;
- to be attentive to another's opinion.

4.2. The relation between the administration and workers

63. Creation of the constructive professional relations between the administration and the subordinated workers is necessary for daily effective work.

64. Heads of structural division are recommended to observe the following norms and rules of business etiquette:

- To show to workers an example of good possession of norms and rules of ethics and business etiquette;
- Not to criticize workers in the presence of other workers, to do it confidentially;
- To be able to recognize own mistakes in front of the workers and not to pursue them for constructive criticism.

65. The workers are recommended to observe the following norms and rules of business etiquette:

- immediately to inform the direct head on the absence reasons on a workplace;

- not to answer in the presence of colleagues incorrect behavior of the head of structural division. If there is a confidence of correctness, it is necessary to ask about personal meeting.
 - to know by sight and by name to a patronymic of heads of structural division.
- 66.** In the presence of labor activity out of AEO workers should:
- to notify the direct head and the head of Department of strategy and corporate management on planned other paid labor activity in other organizations;
 - to issue the labor relations in combination according to the legislation of the Republic of Kazakhstan;
 - to carry out other paid activity which won't influence performance of the fundamental labor obligations by them and to cause a damage to image and interests of AEO;
 - to observe rules of saving of the commercial and other office information provided by the legislation of the Republic of Kazakhstan and the AEO internal documents.

Meetings

In the meetings you should maximize the required time. To do this, employees recommended abiding the following rules and etiquette

- come to the meeting on time
- become familiar with the agenda of the day and take all necessary materials, previously prepared questions or comments
- before the meeting, turn off your mobile phone
- don't use the meeting as a tribune for solving personal problems
- follow the rules
- only discuss relevant themes. Stick within the time frame

4.4. Organizational culture

4.4.1. Dress code of employees. Ethics of employees

68. The appearance of each employee is based on the image of AEO. During the working day, it is recommended to adhere the rules of a business style. Smart dress code

69. Workers should follow the rules of wearing business clothes

- For negotiations wear business suits
- The style of business suit should be conservative and restrained
- Clothing should be appropriate and help set a business style of communication

70. Men are required to wear business suits of muted tones, classic tie and shoes. In the hot season they are allowed to wear shirts with short sleeves. You should not wear T-shirts, jeans, and trainers.

71. Women should be dressed in suits, shirts and blouses in neutral colors, skirts and dresses with office length, classic trousers, and classic shoes. You should not wear short shirts, tops with uncovered shoulders and décolleté, jeans and trainers.

72. You should follow a personal hygiene regime, refrain from using strong perfume and not smell of cigarette smoke.

73. At the organization of celebrations, corporate business meetings, forums and seminars, officers and employees are required to wear a corporate badge. Each worker recognizing the responsibility for developing an organizational culture in the AEO, can wear a corporate badge during working day. Workers who have the state award should wear them on the day of public holidays.

74. It is necessary for workers to adhere to rules of culture of negotiating, including telephone. Business negotiations should be conducted in a quiet, polite tone.

75. Ability of workers to speak by phone with colleagues and business partners promotes creation of favorable impression about AEO as a whole. Also at a phone conversation it is

necessary to remember that in one room there can be colleagues and it is necessary to make thrifty use of their work and not to distract loud conversation.

4.4.2. Corporate holidays

76. One of important elements in formation of organizational culture is carrying out festive actions in collective. Traditional corporate holidays treat – the Independence Day, the Constitution day, Nauryz, New Year, AEO Birthday, the Teachers' Day, Knowledge Day, the Last bell and other holidays according to RK legislation. Festive actions are carried out in AEO and out of. In the organization all workers gather in a conference hall (the assembly hall, depending on a situation) representatives of the management act with congratulations, if necessary mark out workers who have especially caused a stir in work as diplomas, gifts. In case of celebration out of AEO the collective goes out of town on the nature in various cultural institutions where structural divisions prepare musical turns, dances and national games. In some cases at the initiative of the management members of the family of workers are invited.

4.4.3. Birthdays of workers

77. Celebration of birthdays of workers of AEO is traditional for members of labor collective. Officially congratulate AEO management (a greeting card, a bunch of flowers, congratulations AEO on internal mail). For other categories of workers of celebration is held in structural divisions. During celebration of days of births of workers we accept an easy buffet table (soft drinks, fruit, pies, and a cake) in a time off (a lunch break). The responsible department sends congratulations to a birthday man from AEO collective by means of corporate mail. Gifts to workers are presented depending on personal a wish of members of collective.

Chapter 5. Confidentiality

78. Confidential information carried to those according to the legislation of the Republic of Kazakhstan and the AEO internal documents admits.

79. Any data of confidential character which workers have, in exactly number officials, are kept secret if the law of the Republic of Kazakhstan didn't provide other.

80. The workers, which have access to confidential information, shouldn't disclose it to other workers which don't possess access to such information, and as to any third parties. Such restrictions are applied also throughout time established by the AEO internal documents, after dismissal of the worker.

81. During the working day and after its termination when the worker leaves the workplace, he should be convinced that on its desktop or other readily available place there were no the documents containing confidential information. All similar documents should be locked in cases or boxes, and the computer should be switched off or blocked. During conversation with partners behind a desktop of the worker all confidential information, including information on the computer screen, should be visually inaccessible to the interlocutor.

82. Confidential information (in electronic, written or other form) shouldn't be taken out for limits without the corresponding assignment of the management. At dismissal the worker is obliged all belonging AEO documents, files, computer diskettes, reports and the records containing information on AEO or information which isn't intended for a wide range of persons, and also all copies of the documents containing this information.

Chapter 6 Conflict of interests

83. Officials, no less than workers, carry out the professional functions honestly and reasonably with due care and discretion in interests of AEO, avoiding the conflicts.

84. Identification of the conflict of interests and its adequate regulation is an important condition of ensuring protection of interests of AEO and partners.

85. Officials and the worker with a view of prevention of the conflict of interests:

- shouldn't use in the interests or for extraction of personal benefit by possibilities which are provided to it by corporate resources the management of workers of his official capacity and or information received by it owing to execution of functions;
- shouldn't participate in an activity which can potentially lead to the conflict of interests;
- the arising conflicts are obliged to use reasonable efforts were resolved within the current legislation taking into account legitimate interests of the parties involved in the conflict;
- shouldn't accept any gifts or use the benefits connected with its activity in AEO, from any other third parties, and also receive any income or benefits as encouragement for performance.

Should not accept any gift or the benefits connected with his work in the AEO from any other people, as well as to receive any income as a reward for performing functional responsibilities, except for income received directly from AEO. It is not acceptable to receive any gifts or benefits, except for symbolic signs of attention and symbolic gifts in accordance with generally accepted standards of courtesy and hospitality, and during some formal events.

86. Conflict of interest is regulated by this Code and other internal documents.

Chapter 7. Responsibility

87. Adherence to this Code is mandatory for all employees.

All violations of ethical standards in accordance with this Code shall be considered in accordance with the legislation of the Republic of Kazakhstan and the internal acts of AEO

Chapter 8. Practical application

88. This Code is an internal document of the AEO mandatory for officials and all employees, regardless of position.

89. AEO encourages employees to openly discuss the Code and has a positive attitude to any constructive suggestions for improvement.

90. On issues regarding the Code or the ethical issues arisen during work, as well as for violations of the Code, corruption and other illegal actions, officials and employees, as well as business partners and interested persons can contact:

- to the supervisor or to the next level supervisor;
- The Department of Strategy and Corporate Management;
- by phone 70-57-09, e-mail address of trust: doverie@nis.edu.kz, posing or anonymously, to take to appropriate measures.

91. In case of violation of approved standards of corporate ethics, the materials for making a decision are sent to the Board of Management of AEO with the obligatory participation of the Department of Strategy and Corporate Management. The decisions and results of the review are reported to the person within three (3) working days from the date of the decision.

92. Members of the Board and the Department of Management and Corporate Strategy of AEO provide online icon examination of information of a violation of the Code.

Chapter 9. Clarification and familiarization with the Code

The department which is responsible for the development of the Code, provides the introduction to the code:

- In respect of employees - within 10 working days after the approval of the Code;
- In respect of new employees - when hiring;
- In respect of officials – when designating to the position;
- In the case of amendments and addenda of the Code - familiarization of employees and officials will be held within 10 working days from the date of their adoption

94. Explanation of the provisions of the Code is fulfilled by the Department of Strategy and Corporate Management

95. The Code is a public document and is freely available to partners and any other interested people.

Chapter 10. Conclusion

96. The Code of ethics approved by the board of AEO

97. In accordance with the established procedure it is possible to make amendments and addenda to the Code