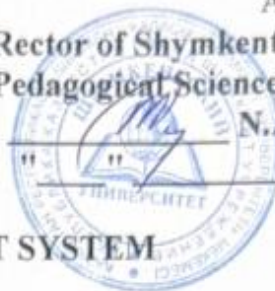




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2026



QUALITY MANAGEMENT SYSTEM

MODERN SLAVERY POLICY

QMS SHU RU 01-60 2026


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Content

1. Introduction	3
1.2. Reference Documents	3
1.3. Terms, Definitions and Abbreviations	3
2. Main Provisions	3
3. Conclusion	6
Appendix A – Acknowledgement Sheet	7
Appendix B – Amendments Registration Sheet	8

	Shymkent University	
	Quality Management System Modern Slavery Policy	page 3 of 8

1. Introduction

1.1. The Policy on Combating Modern Slavery encompasses a system of international legal standards and governmental measures aimed at preventing human trafficking, forced labour, various forms of exploitation, and unlawful restriction of freedom. The primary objective of this Policy is to protect human rights, ensure that offenders are held accountable, and provide support, assistance, and social reintegration for victims.

This document has been developed in accordance with the principles of “Education 2030: Ensuring Inclusive and Equitable Quality Education and Lifelong Learning Opportunities for All,” adopted on 21 May 2015, the Charter approved by Order No. 345 of the Chairman of the Committee for State Property and Privatization, the Strategic Development Plan for 2023–2025, and other internal regulatory documents.

1.2. Reference documents

Law of the Republic of Kazakhstan “On Education” No. 319 dated 27 July 2007.
 Kazakhstan–2050 Development Strategy.
 University Charter.
 University Academic Policy.
 Internal Regulations.

1.3. Terms, definitions and abbreviations

SU – Shymkent University.

UN – United Nations.

CIS – Commonwealth of Independent States.

2. MAIN PROVISIONS

2.1. MODERN SLAVERY POLICY


This Modern Slavery Policy of Shymkent University applies to all University employees and does not form part of any employee’s contract of employment. This Policy has been developed in accordance with the requirements of the current legislation of the Republic of Kazakhstan in the field of equality and diversity.

2.2. Purpose

Shymkent University is committed to taking all reasonable measures to ensure that no form of modern slavery or human trafficking occurs within its activities.

2.3. Policy Objectives

Shymkent University undertakes to:

	Shymkent University	
	Quality Management System Modern Slavery Policy	page 4 of 8


- identify and assess potential risk areas and implement procedures aimed at preventing incidents of slavery or human trafficking;
- raise awareness among all employees regarding the risks of modern slavery, particularly among staff whose work is associated with vulnerable sectors and high-risk areas;
- implement due diligence procedures in recruitment processes, as well as verification procedures relating to supply chains, agents, and other associated parties of the University and its partner organizations;
- require partners to take all reasonable measures to eliminate modern slavery within their supply chains;
- establish effective systems and monitoring mechanisms and ensure compliance with them in order to prevent modern slavery both within the University’s operations and throughout every stage of its supply chains.

2.4. Policy Principles. Shymkent University is committed to fostering an inclusive university community and contributing to the development of an inclusive and equitable society in which people are treated with dignity and respect, inequality is challenged, and diverse needs and circumstances are anticipated and responded to positively.

In accordance with the equality requirements of the legislation of the Republic of Kazakhstan, public sector obligations require due consideration of the need to eliminate discrimination, promote equal opportunities, and foster mutual understanding and positive relations among different groups of people. Shymkent University is committed to allocating the necessary resources, including human resources, time, and financial resources, and to ensuring the effective organization of internal processes in order to meet its obligations under the legislation of the Republic of Kazakhstan and to implement its equality action plan effectively. Our approach to preventing modern slavery is based on the following principles.

2.5. Zero-Tolerance Policy on Modern Slavery. Shymkent University recognizes that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking. All of these forms involve the deprivation of a person’s freedom for the purpose of exploitation by another individual for personal or commercial gain.

2.6. Compliance with Legal and Regulatory Requirements. Shymkent University complies with all applicable laws and regulatory requirements relating to modern slavery and human trafficking. **Due Diligence** The University conducts due diligence reviews of its supply chains in order to identify and assess the risks of modern slavery and human trafficking. The University works closely with suppliers to ensure that they have in place and effectively implement appropriate policies and procedures aimed at preventing slavery.

	Shymkent University	
	Quality Management System Modern Slavery Policy	page 5 of 8

2.7. Reporting, Training and Awareness. Shymkent University encourages all employees and suppliers to report any concerns or issues related to modern slavery and human trafficking.

Training and Awareness. The University provides training and awareness programs for all employees and suppliers to increase their understanding of the risks and consequences of modern slavery and human trafficking. In addition, they are informed about the procedures for identifying and reporting violations related to these issues.

Continuous Improvement. The University is committed to the continuous improvement of its approaches to preventing modern slavery and human trafficking. Existing policies and procedures are regularly reviewed and updated to ensure their relevance, effectiveness, and compliance with modern slavery prevention requirements.

2.8. Accountability and Monitoring. Shymkent University encourages employees, partners, and other stakeholders to report any potential instances of modern slavery or human trafficking. In addition, the University continuously monitors the implementation of this Policy and periodically reviews it to ensure its ongoing relevance, adequacy, and effectiveness.

2.9. Due Diligence. The University recognizes that due diligence is a fundamental element of its Modern Slavery Policy. This process involves the collection and analysis of various types of information and the application of appropriate assessment methods to prevent any form of modern slavery both within the University's operations and throughout its supply chains.

2.10. Employee Participation. Shymkent University is committed to protecting its employees from the risk of becoming victims of modern slavery. To this end, the University conducts due diligence procedures with respect to employees in accordance with applicable legislation.


2.11. Student Participation. With regard to students, Shymkent University is committed to the continuous improvement of measures aimed at preventing modern slavery and promoting responsible labour practices throughout its supply chains. This continuous improvement approach includes the regular monitoring, evaluation, and review of existing policies and procedures.

2.12. Responsibility. Ultimate responsibility for preventing and eliminating modern slavery rests with the senior management of Shymkent University.

Managers at all levels are responsible for ensuring that employees under their supervision understand the requirements of this Policy and carry out their duties in accordance with its provisions.

In addition, managers are responsible for ensuring that employees receive appropriate regular training on this Policy and on issues related to modern slavery.

2.13. Information and Awareness Activities for Employees. The Human Resources Department organizes appropriate training and awareness programs

	Shymkent University	
	Quality Management System Modern Slavery Policy	page 6 of 8

aimed at ensuring that employees have sufficient knowledge and understanding to identify various forms of modern slavery and human trafficking.

2.14. Policy Violations. Any violations of the requirements of this Policy shall be investigated thoroughly and comprehensively, taking into account the specific circumstances of each case.

A breach of the provisions of this Policy by a University employee may constitute grounds for disciplinary action in accordance with the established disciplinary procedures.

Serious violations of this Policy may be regarded as gross misconduct.

3. CONCLUSION:

The University maintains a firm commitment to combating modern slavery and human trafficking by ensuring safe and fair working conditions for employees and partners. This Policy is aimed at preventing all forms of exploitation both within the University's operations and throughout its supply chains and complies with the legislation of the Republic of Kazakhstan and international standards.

The University is committed to continuing the implementation of these measures while ensuring compliance with the principles of equality and human rights for all participants in the educational process.

