

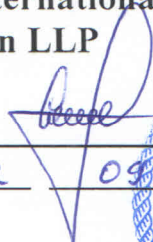


INTERNATIONAL EDUCATIONAL CORPORATION
LLP

ZERO TOLERANCE POLICY ON HARASSMENT

Approved

Rector
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ZERO TOLERANCE POLICY ON HARASSMENT

Almaty



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1. Introduction

1. This Harassment Prevention Policy at MOK LLP defines the corporation's approach to preventing and responding to all forms of harassment.
2. All forms of harassment are unacceptable and must be prevented.
3. MOK LLP has a zero-tolerance policy towards harassment.
4. All MOK LLP employees are required to adhere to high moral and ethical standards of personal and professional conduct.

2. Scope

2.1 The policy applies to employees and trainees of MOK LLP in the performance of their duties and training, regardless of where the actions are performed. Control over the personal life of an employee outside working hours by the employer is not provided for and is not possible.

2.2 All forms of harassment are prohibited:

- **Physical:** unwanted touching or physical contact.
- **Verbal:** threats, promises of benefits, insults, obscene jokes, messages in any form (letters, emails, memes, etc.).
- **Nonverbal:** indecent looks, gestures, sounds.
- **Psychological abuse:** creating an intimidating, hostile, or offensive environment.
- **Display of offensive materials:** posters, images, audio/video materials with offensive content.
- **Cyberbullying:** offensive letters, messages on social networks and in chat rooms.

3. Terms and definitions

3.1 Terms used:

- **Harassment:** behavior that causes discomfort or harm and violates personal integrity.
- **Disciplinary Committee:** a body that reviews complaints and monitors compliance with the Policy.
- **Incident:** cases related to harassment.
- **Zero tolerance policy:** standards prohibiting harassment and providing for measures in case of violation.
- **Complainant:** a person who reports harassment.
- **Victim:** a person who has been subjected to harassment.
- **Whistleblower:** a person who reports harassment.



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- **False report:** a misleading statement made for the purpose of gaining an advantage or causing harm.
- **Sexual exploitation, abuse, harassment:** specific forms of sexual harassment.
- **Complaint:** a report of harassment.
- **Employee:** an employee of MOK LLP.
- **Ombudsman:** an employee who assists in combating harassment.
- **HR department:** a department that receives complaints and monitors the situation.
- **SDR (Social Development Department):** a department that works with students on Policy issues.

4. Abbreviations and designations

No.	Abbreviations	Full name
1	SEND	Sexual exploitation, abuse, harassment

5. Regulatory references

1. Constitution of the Republic of Kazakhstan
2. Labor Code of the Republic of Kazakhstan
3. Civil Code of the Republic of Kazakhstan
4. Criminal Code of the Republic of Kazakhstan
5. Code of the Republic of Kazakhstan on Public Health and the Healthcare System
6. Code of the Republic of Kazakhstan on Administrative Offenses
7. Law of the Republic of Kazakhstan on Personal Data and Their Protection
8. Regulations on the Ethics Council of MOK LLP
9. Regulations on the Disciplinary Commission for Employees of MOK LLP
10. Regulations on the Disciplinary Commission for Students of MOK LLP
11. Information Security Policy of MOK LLP
12. Regulations on the Protection of Personal Data of Employees and Students of MOK LLP
13. Code of Ethics for Students of MOK LLP

6. General provisions

- 6.1 Employees and students are required to report suspected harassment to management.
- 6.2 Everyone is required to maintain an environment of zero tolerance for harassment.



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6.3 Mandatory introductory training for all employees and students.

6.4 Response methods: accessibility, investigation, referral.

6.5 Cooperation agreements contain obligations to comply with the Policy; violation is grounds for termination of cooperation.

7. Main section

7.1 Purpose: to promote a policy of zero tolerance for harassment and create a safe environment.

7.2 Objectives: raising awareness, informing about unacceptable behavior, creating conditions for protection, establishing an investigation process, protecting the rights of all participants.

7.3 Principles:

- Harassment is completely unacceptable.
- Taking all measures to prevent and eliminate it.
- Promoting equality.
- Raising awareness.
- Possibility of termination of contractual relations in case of violations.

7.4 Procedure for filing complaints:

- Hotline: 8778 351 50 66 (WhatsApp)
- Email: info@mok.kz

7.5 Complaint content: Full name, department, description, witnesses, impact, measures, other relevant information.

7.6 It is recommended to submit a complaint within 3 days after the incident.

7.7 Review of complaints: the supervising manager provides explanations, notifications, a decision on investigation, protective measures, and a recommendation to contact law enforcement agencies if necessary.

7.8 The investigation is conducted in accordance with the established procedure, where, if necessary, it is referred to the disciplinary committee for consideration.

7.9 Commission decisions: recommendations on disciplinary action, apologies, prevention, and other measures.

7.10 When making decisions, the following shall be taken into account: the degree of confirmation, harm, similar cases, evidence, etc.

7.11 The commission's report is sent to the rector.

7.17.13 Recommendation to contact law enforcement agencies if a crime is suspected.

7.14 The deadline for reviewing appeals is no more than 15 working days.

7.15 Protection of applicants and informants, measures to ensure confidentiality, liability for false reports.



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7.16 Implementation and monitoring:

- 1) Posting the policy on the website
- 2) Information materials
- 3) Training of employees and new staff
- 4) Monitoring of policy implementation

7.17 Confidentiality: compliance, protection of the identity of the complainant and whistleblower.

8. Review, storage, and distribution

8.1 Change management in accordance with regulations.

8.2 The original is stored in the office of MOK LLP.

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9. CHANGE REGISTRATION SHEET

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10. INFORMATION SHEET

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