



INTERNATIONAL EDUCATIONAL
CORPORATION LLP

POLICY ON PREVENTING MODERN
SLAVERY AND ENSURING ETHICAL
SUPPLY CHAINS

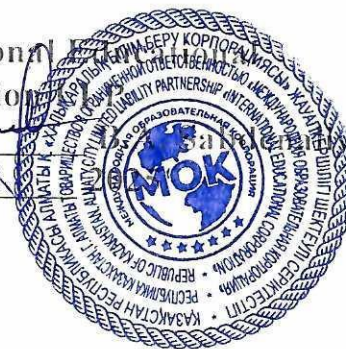
Approved

Rector

International

Corporation

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Policy
on the prevention of modern slavery
and ensuring the ethicality of the supply chain
International Educational Corporation LLP

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1. General provisions, purpose, and principles

1.1. General provisions

International Educational Corporation LLP (hereinafter referred to as IEC LLP), as a leading educational and scientific center, recognizes its social, ethical, and institutional responsibility for the formation of fair, safe, and responsible practices in society.

MEC LLP recognizes that modern forms of slavery, including forced labor, human trafficking, and exploitation, can exist in hidden forms even in legitimate supply chains.

This Policy is an official expression of our zero tolerance for any form of slavery and a tool for ensuring ethical procurement in accordance with the principles of sustainable development, respect for human rights, and good corporate governance.

1.2. Purpose

The policy aims to establish a unified system for managing risks associated with modern slavery by:

- systematically identifying, preventing, and minimizing risks;
- introducing standards of transparency, accountability, and good governance;
- ensuring compliance with the principles of social responsibility at all stages of the supply chain and operational activities of MOK LLP.

The policy supports MOK LLP's commitments under the UN Sustainable Development Goals (SDGs 8 and 16) and complies with the principles of the UN Global Compact.

1.3. Principles

- **Zero tolerance** – complete exclusion and rejection of all forms of slavery and exploitation.
- **Precautionary principle** – actively identifying and preventing risks before incidents occur.
- **Transparency and accountability** – documenting all decisions and reporting to stakeholders.
- **Integration and involvement** – participation of all departments, employees, students, contractors, and suppliers in the implementation of the Policy.
- **Continuous improvement** – reviewing procedures based on internal audits and global best practices.

2. Scope and audience

The Policy is mandatory for all employees, students, contractors, and suppliers of MOK LLP, including:



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- employees of all categories (permanent, temporary, contracted);
- department heads, members of collegial bodies;
- students, master's students, doctoral students, volunteers involved in procurement, research, or production activities;
- contractors, suppliers, subcontractors, recruitment agencies, and distributors.

By signing a contract with MOK LLP, contractors undertake to comply with the principles of this Policy.

3. Terms and definitions

All terms and definitions in this policy are in accordance with ILO Conventions Nos. 29, 105, 138, 182, and the UN Protocol on Trafficking in Persons.

Modern slavery is any form of human exploitation that violates a person's freedom and dignity.

Forced labor is work required under threat of punishment and without free will.

Human trafficking is the recruitment, transportation, or holding of a person for the purpose of exploitation.

Child labor is any work that is harmful to a child's health, education, and development.

Supply chain – all links in the chain of supplying MOK LLP with goods, services, and work, including subcontractors.

Due diligence is a procedure for verifying the integrity and reliability of partners, aimed at identifying potential risks, non-compliance with legal requirements, and principles of responsible business conduct.

4. Distribution of duties and areas of responsibility

Division / Role	Main responsibilities
Rector, Vice-Rectors, and Supervisory Board	Approval of the Policy, annual analysis of reports, allocation of resources
Department Heads	Implementation of Policy principles in departments, training oversight, internal risk assessment
Procurement Department	Supplier registry, due diligence, audit, and monitoring
HR department	Verifying the legality of hiring, organizing the provision of information to employees about labor rights and obligations, and ensuring the functioning of anonymous channels for reporting violations



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Legal Department	Legal review of documents and contracts, legal support
All employees and students	Familiarization, training, reporting violations

5. Risk assessment and due diligence procedure

Assessment stages:

1. **Identification** – analysis of suppliers and operations by risk category (high, medium, low).
2. **Initial screening** – supplier questionnaires, verification of data in public sources and registries.
3. **In-depth verification** – document audit, request for evidence of compliance with labor standards, on-site inspections.
4. **Monitoring and corrective actions** – development of an improvement plan, recording of supplier status.
5. **Reporting** – storing documentation for at least 5 years, reflecting key indicators in the annual report of MOK LLP and the supplier database.

6. Procurement and contract management

1. All contracts contain an Appendix on Ethics and Social Responsibility, confirming compliance with the principles of this Policy.
2. ESG assessment criteria are included in the tender documentation.
3. For violation of the Policy, MOK LLP has the right to terminate the contract and exclude the supplier from the register.

7. Training and Competency Development

1. **Basic level:** mandatory online course (30 minutes) for all employees and students.
 2. **Advanced level:** training for HR, purchasers, managers (annually).
 3. **Expert level:** certification of supply chain audit specialists.
- Training coverage must be at least 95% of employees and 100% of those responsible for procurement.

8. Reporting violations and protecting whistleblowers

MOK LLP has secure communication channels in place:

☎ Hotline: +7(727) 220-80-58 (ext.) 1109

✉ Email: a.zhuandykova@kazgasa.kz

📧 Trust boxes

Any form of pressure on persons who report violations is prohibited.



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All reports are treated confidentially and anonymously. Reports may be submitted electronically or in writing.

Violation of the principle of whistleblower protection will result in disciplinary action.

9. Monitoring, audit, and reporting

The procurement department prepares an annual report on the implementation of the Policy, including quantitative and qualitative indicators:

- the share of contracts and suppliers that have undergone due diligence;
- results of audits and supply chain inspections;
- the number of reports received about possible violations and the measures taken in response;
- the effectiveness of corrective actions implemented as a result of the checks.

An internal audit of the effectiveness of the Policy's implementation is **conducted** at least once every two years, with an analysis of the results achieved, identified non-conformities, and recommendations for improving procedures.

An annual Public Statement on Combating Modern Slavery is approved by the rector of MOK LLP and posted on the official website.

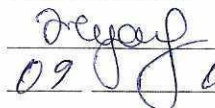
The statement reflects key results, achievements, identified risks, and directions for further development of the supply chain ethics management system.

10. Final provisions

The policy shall come into force on the date of approval and shall be reviewed at least once every two years or when there are changes in legislation, international requirements, or the structure of MOK LLP.

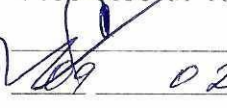
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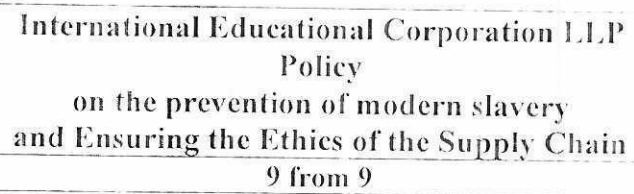
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11. Change log

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