**«APPROVED»**

**by the decision of the**

**Management Board of**

**Joint Stock Company**

**«Damu Entrepreneurship**

**Development Fund»**

**Appendix № 1**

**to Minutes of the Meeting**

**of the Management Board of**

**«Damu Entrepreneurship**

**Development Fund»**

**Joint Stock Company**

**dated November 14, 2024**

**№ 79/2024**

**Policy**

**of Damu Entrepreneurship Development Fund**

**in the field of equal opportunities, inclusiveness and diversity**

Almaty 2024

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# Chapter 1. General Provisions

1. The policy of JSC “Damu Entrepreneurship Development Fund” in the field of equal opportunities, inclusiveness and diversity (hereinafter referred to as the Policy) has been developed with the aim of strengthening the Fund’s commitment to the principles of equality, non-discrimination, respect for the individual and fairness in relation to employees, in accordance with international standards in the field of equality and protection of human rights, including the principles established by the Constitution of the Republic of Kazakhstan and other generally recognized documents in this area.
2. The Policy is a voluntarily adopted document and is freely distributed in JSC “Damu Entrepreneurship Development Fund” (hereinafter referred to as the Fund) among employees and other interested parties with whom the Fund interacts.
3. The Fund encourages employees, clients, contractors and other stakeholders to adhere to the principles of equal opportunity, inclusion and diversity in their activities.
4. The following terms are used in this Policy:
5. Discrimination - any distinction, exclusion or preference made on the grounds of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
6. Inclusion - the process of engaging, accepting and recognizing the value of all employees, regardless of their differences and social identities, and creating conditions in which employees are given equal opportunities to participate in achieving the Fund's success.
7. diversity - the specificity of a work environment that is focused on accepting culturally and socially diverse groups and individuals, as well as on an adequate and impartial assessment of their specific skills, competencies, development prospects and other characteristics;
8. employee - a person who is in an employment relationship with the Fund and directly performs work under an employment contract;
9. equality - demonstrating respect for the differences and factors that determine the differences between employees, abilities and other unique characteristics of employees, and, as a result, providing employees with equal opportunities;
10. equal opportunity - an approach in which all employees are treated equally and are not subject to discriminatory factors.

# Chapter 2. Basic principles

1. In its commitment to equal opportunities, inclusion and diversity in the workplace, the Fund is guided by the principles set out in the legislation of the Republic of Kazakhstan and international treaties to which the Republic of Kazakhstan is a party, and is also guided by the principles set out in the Convention on Equal Remuneration for Men and Women Workers for Work of Equal Value (Convention 100), the 1958 Discrimination (Employment and Occupation) Convention (Convention 111), and the Convention on the Rights of Persons with Disabilities.
2. Ensuring equal opportunities, inclusion and diversity for employees is an important factor in the long-term competitiveness of the Fund, and helps attract and retain talent, promotes high-quality corporate decisions and builds a competitive development strategy.
3. The Fund provides employees with social guarantees in accordance with the requirements of the legislation of the Republic of Kazakhstan.
4. The Fund creates a corporate culture based on mutual respect among employees and the absence of social prejudices and cultural barriers.
5. Fund provides a decent, safe and comfortable working environment in which each employee feels respected, accepted and heard, and has the necessary powers and rights to perform their job duties.
6. The Fund encourages transparency in labor relations, helps all employees develop and build a career by providing support and creating conditions for professional growth.
7. Fund strives to maintain a competitive and decent level of remuneration for employees: the amount of remuneration for all employees of the Fund is formed on the basis of objective factors associated exclusively with the effectiveness of the performance of job responsibilities.
8. The Fund encourages any initiatives and ideas of employees, the implementation of which may be important for the development and enhancement of the long-term sustainability of the Fund’s activities.
9. The Fund takes reasonable steps to maintain the employment of workers who, due to a disability, become unable to perform their duties, including through retraining, provision of special equipment or reduction of working hours.
10. The Fund seeks to involve women in various aspects of its activities and management processes.
11. The Fund is committed to building diverse teams and promoting diversity initiatives, including prioritizing local hiring and targeted recruitment.

# Chapter 3. Basic Obligations

1. The Fund does not allow discrimination in the sphere of labor on the grounds of origin, social, official and property status, gender, race, language, age or physical disabilities, nationality, attitude to religion and (or) other individual distinctive characteristics that are not related to the business qualities of the employee in accordance with the Constitution of the Republic of Kazakhstan.
2. The Fund guarantees equal treatment of all employees in all aspects of the Fund's work activities, including selection and hiring, career advancement, training, advanced training, behavior at work, disciplinary action, and termination of employment.
3. The fund ensures gender equality in pay for equal work.
4. The Fund nominates candidates for appointment to management positions based on the qualifications and professional experience of candidates to ensure high quality management and planning through adequate representation of various professional skills, experience and expertise.
5. The Fund does not tolerate violations of human dignity, including any form of harassment, humiliation or abuse. Any form of violence in the workplace, including physical and psychological, is prohibited.
6. The Fund does not accept any form of patronage or attempts to interfere with personal, friendly, family and kinship relations in the implementation of the principle of equal opportunities.
7. The Fund strives to ensure that every employee has the right to receive and provide regular feedback.
8. The Fund respects the needs of employees with disabilities, focusing on creating a barrier-free environment and ensuring the accessibility of its offices.
9. The Fund aims to create a culturally and socially diverse workforce, positioning diversity and inclusivity as a competitive advantage.
10. The Fund respects the diversity of personal values ​​and worldviews, and does not interfere with the open expression of employees' views and opinions.
11. The Fund complies with the labor legislation of the Republic of Kazakhstan: working conditions in the Fund comply with the requirements of the legislation of the Republic of Kazakhstan in the field of ensuring safety and labor protection, improving health protection, as well as the requirements of the relevant internal documents and procedures.
12. The Fund seeks to establish mentoring programs related to diversity, equal opportunity and non-discrimination issues to support employees, partners and other stakeholders.
13. The Fund regularly analyses the level of wages and remuneration of employees in all positions in order to identify gender and other wage gaps that are not related to their professional qualities, and also strives to form initiatives to eliminate them.
14. The Fund is committed to increasing diversity at all levels, including the Board of Directors, Management Board, to develop a model of inclusive behavior, bias and cultural understanding.
15. The Fund seeks to develop educational training on diversity issues for Fund employees and management.

# Chapter 4. Implementation of the principles of the Policy

1. The Fund carries out regular internal monitoring of the compliance of its activities with the principles of the Policy, and also monitors changes in the legislation of the Republic of Kazakhstan and standards in the field of equal opportunities, inclusiveness and diversity to ensure the relevance of this Policy.
2. The Fund ensures that all stakeholders are aware of the principles of this Policy and also strives to provide regular training to employees regarding the application of this Policy and the procedures governing the approach to diversity and inclusion.
3. The Fund provides employees with the opportunity to freely report potential violations of the Policy and guarantees the confidentiality of requests.
4. Notification of violations of the Policy occurs in accordance with the internal regulatory documents of the Fund (the Code of Business Ethics of JSC "Damu" Entrepreneurship Development Fund", the Corporate Information Policy of JSC "Damu" Entrepreneurship Development Fund) or in one of the following ways:

- by e-mail: [[senim@fund.kz](mailto:senim@fund.kz)](mailto:senim@fund.kz);

-to the helpline: +7(727) 244 82 71;

-to the postal address: AO5C9Y3, Republic of Kazakhstan, Almaty city, Gogol street, 111;

-inform the Anti-Corruption Service of the Fund via any of the hotline channels that ensure the confidentiality and anonymity of the message

1. All requests regarding violations of this Policy must be promptly accepted and objectively reviewed in accordance with internal procedures for reviewing requests.
2. The Fund guarantees the absence of retaliatory measures and disciplinary sanctions against employees who report a possible violation of the Policy, provided that the false information was not reported intentionally or for selfish purposes.
3. In the event of risks being identified or violations occurring, the Fund promptly develops an action plan to eliminate negative consequences, and also implements measures to improve practices to ensure equal opportunities, inclusiveness and diversity.

# Chapter 5. Monitoring compliance with the Policy

1. Managers at all levels make ethically sound decisions and do not allow in their management practices actions that may harm the personal dignity and legitimate interests of employees.
2. Heads of structural divisions and regional branches ensure that employees of the relevant divisions comply with the principles of the Policy.

# Chapter 6. Responsibility

1. Each employee of the Fund, including officials, is responsible for maintaining a culture of equal opportunities, diversity and creating an inclusive environment. The Fund expects each employee to treat their colleagues with respect and to resist any form of pressure and harassment.
2. For violation of the principles provided for in this Policy, any employee of the Fund, regardless of the position held, may be subject to appropriate types of disciplinary sanctions in the manner prescribed by the Labor Code of the Republic of Kazakhstan.

# Chapter 7. Final Provisions

1. This Policy of the Fund is open to the general public and is posted on the official Internet resource of the Fund.
2. This Policy shall enter into force on the date of approval.
3. The Fund strives to ensure constant compliance with the provisions of this Policy in its activities.
4. The Fund will improve and update this Policy taking into account changes in the legislation of the Republic of Kazakhstan and the emergence of new standards in the field of equal opportunities, inclusiveness and diversity in international and national practice.

**Signed by the secretary**

14.11.2024 18:48 Zhaniya Kadirbekovna Yusupova

