

Stakeholder Engagement Plan

Grid infrastructure modernization
Programme in the Turkestan region
of Kazakhstan

Revision: 4.0

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Public

Contact Details:

Name: Adamidi Mira

Telephone: + 7 (7252) 777-333 (Shymkent)

Email: m.adamidi@ojt.kz

Address: Shymkent, Tokayev street, 27

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ACRONYMS AND ABBREVIATIONS

CLO	Community Liaison Officer
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
GBVH	Gender-based Violence and Harassment
GRM	Grievance Redress Mechanism
HV	High Voltage
LLP	Limited Liability Partnership
MW	Megawatt
NGOs	Non-Governmental Organization
NTS	Non-Technical Summary
PR	Performance Requirement
RoK	Republic of Kazakhstan
SEP	Stakeholder Engagement Plan
TBC	To be confirmed

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1 INTRODUCTION

This document is a Stakeholder Engagement Plan (hereinafter referred to as “SEP” or “the Plan”) for the Grid infrastructure modernization Programme in the Turkestan region of Kazakhstan (the “Project”).

The Project is being implemented by Ontustyk Zharyk Transit LLP (“Company” or ‘OZhT’) which is 100% owned by Kazakhstan Utility Systems LLP. The Project forms part of the National Plan for Grid Modernization (2025–2029).

This SEP describes the mechanisms by which public – especially local communities – and other stakeholders are informed about the Project and given opportunities to provide comments and input to the Project development.

The SEP is a “living” document and will be updated along with the Project progress reflecting needs for and specific of further engagement with stakeholders.

2 PROJECT DESCRIPTION

The Project will modernise the distribution infrastructure in Southern Kazakhstan, particularly in the Turkestan region, improving network reliability, reducing technical losses, and enabling better integration of renewable energy. These upgrades will strengthen system resilience, enhance quality of service for end users, and contribute to the broader decarbonization of the energy sector.

The Project includes construction and modernisation of transmission, distribution lines and substations, and modernisation of supporting auxiliary infrastructure. The Project aims to respond to the growing demand in the region, decrease the grid degradation, facilitate reduction of losses as well as integrate digital solutions (SMART GRID, SCADA, etc) in Shymkent and multiple districts in the Turkestan region.

These measures will enable faster fault detection, more responsive load management, and improved integration of renewable energy at the distribution level. The Project is also expected to support climate resilience and generate significant environmental benefits by reducing technical losses, lowering CO₂ emissions, and improving the overall efficiency of electricity delivery to end users.

The project includes the following subprojects:

- Reconstruction of the 0.4-10 kV overhead line (2026-2029);
- Replacement of the AC wire with a high-temperature wire (2026);
- Reconstruction of TP/KTP (2026-2029);
- Installation of Smart meters (2025-2027).

Currently, the development of detailed designs is at an early stage, with only overhead power line (OHL) replacement subproject completed in detail.

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3 STAKEHOLDER ENGAGEMENT OBJECTIVES AND PRINCIPLES

Stakeholder engagement assumes the process of stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders.

The Company's general goals for engaging with stakeholders regarding the Project are outlined in the table below (Table 1).

Table 1: Stakeholder Engagement Objectives

Objectives	Rationale
Identify Project stakeholders	Identify and categorize individuals or organizations that may be affected by the Project or have an interest to the Project
Disclose Project information in an open and transparent manner	Ensure that all stakeholders, especially those directly affected by the Project, have all relevant information to enable informed comments and future planning. Information should allow affected parties to understand potential impacts, risks and benefits, and an open and transparent approach is central to this aim
Establish relevant communication approaches for different stakeholders' group	Perform proactive engagement activities and avoid conflicts based on rumour and misinformation. Ensure trusted communication channels for submission of grievances from the early phases.
Recording feedback, concerns, and views of stakeholders regarding the Project	Conducting meaningful consultation where position of interested parties will be voiced to allows the Company to better understand stakeholder concerns and expectations. Record stakeholder issues, concerns, and comments to allow tracking and understanding the rationale for Project decisions.
On-going reporting to affected stakeholders	Provide periodic reports to the affected stakeholders that describe progress with implementation of the Project Action Plan on issues that involve on-going risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders
Fulfil national and international requirements for consultation	Ensure compliance can avoid potential business interruption risks and Project delays based on procedural issues rather than substantive ones and contribute to obtaining the social license to operate and building effective and trustful relations with stakeholders

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4 NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

4.1 Public Hearings and Information Disclosure under the Republic of Kazakhstan Requirements

According to the requirements of the Environmental Code of the Republic of Kazakhstan, the public has the right of access to environmental information (Article 18). The Code defines the rights of citizens to public participation in the environmental assessment process and other procedures for which public participation is envisaged (Article 15); sets out the phases and sequence of the environmental impact assessment procedure (Article 67) and the requirements for holding public hearings (Article 73). The Project does not provide for environmental impact assessment, as all Project facilities categorised as IV; so, no public hearings with regard to environmental impacts is planned for the Project.

Law of the Republic of Kazakhstan 'On Access to Information' dated November 16, 2015 No. 401-V ZRK¹ defines socially significant information, access to which cannot be restricted for citizens (in particular, access to environmental information, Article 6). According to the requirements of national legislation, citizens have the right to make a written request to the supervisory authorities who own relevant information. In accordance with the article 17 p.2 the supervisory authorities are obliged to provide access to information to vulnerable groups of people (in particular for persons with disabilities) by adopting the web content accordingly to make it accessible.

OZhT is a natural monopoly and in accordance with the legislation² increases of tariffs on electrical energy are subject to public consultations. Committee on Regulation of Natural Monopolies and Protection of Competition of the Ministry of National Economy of the Republic of Kazakhstan is responsible for organization of public hearings. The Committee publish announcements on public hearings in regional mass media 30 days prior to the date of hearings (10 days in case simplified procedure is applicable).

The legislation of the RoK does not establish requirements for legal entities – holders of information – on the application of the grievance redress mechanism, as well as the need to notify stakeholders on the Project progress throughout all its phases. However, OZhT as a natural monopoly together with the Committee must provide its consumers with monthly personal reception.

4.2 EBRD's Requirements

The EBRD Environmental and Social Requirements (ESRs) are relevant in the context of a potential finance of the Project by the EBRD, setting a benchmark for good practice for environmental and social risk management in private sector developments. The EBRD's environmental and social policy³ includes requirements for stakeholder engagement (ESR 10).

The key requirements for stakeholder engagement through the life of the Project are summarised below:

- *Stakeholder identification and analysis.* The engagement planning stage includes the identification and documentation of stakeholders. Stakeholders defined as the various individuals or groups

¹ Source: <https://adilet.zan.kz/rus/docs/Z1500000401>

² [The Law of the Republic of Kazakhstan dated December 27, 2018 No. 204-VI "On Natural Monopolies" \(with amendments and additions as of 07/29/2025\)](#)

³ The EBRD's environmental and social policy, 2024. Source: <https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2024.html>

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who are affected by the Project's activities and operations or individuals or groups who may have an interest in the Project Company is also required to identify vulnerable individuals or groups of individuals.

- *Stakeholder engagement planning.* For Projects where adverse environmental or social risks and impacts are likely to occur, the Company shall engage affected communities through disclosure of information, consultation, and informed participation, in a manner that is meaningful for stakeholders and commensurate with the risks to and impacts of the Project on the affected communities. The Company is required to prepare a *Stakeholder Engagement Plan (SEP)*, where all engagement approaches and formats will be summarized, disclosed to stakeholders and discussed with them and then implemented.
- *Information disclosure.* If a Project has significant environmental or social impacts throughout the Project's life cycle, the Company should disclose relevant information about the Project to stakeholders as it becomes available.
- *Conducting meaningful consultations.* The Company must ensure that meaningful consultations are held with stakeholders throughout the entire Project lifecycle. The consultation process is based on the preliminary disclosure and dissemination of information about the Project and is documented by the Company. During consultations, the Company takes into account the opinions and concerns of stakeholders, on the basis of which mitigation measures are developed.
- *Receive and facilitate complaints through a grievance mechanism.* The grievance mechanism (GRM) should ensure an objective consideration of issues that is culturally acceptable and free from the use of repressive measures. The GRM should be accessible to all stakeholder groups, including vulnerable individuals and groups of individuals, and provide for the possibility of submitting anonymous requests.
- *Establish a procedure for external communications,* proportionate to the risks and potentially adverse impacts of the project, which includes methods to receive and respond to external communications from project stakeholders.
- *Monitor the effectiveness of the engagement process.* The engagement process should be carried out throughout the entire life cycle of the Project, if necessary, ensure the confidentiality of stakeholders and be free from the use of repressive actions against stakeholders. During the implementation of the Project, the Company is required to monitor the effectiveness of the engagement process and the grievance mechanism.

5 STAKEHOLDER IDENTIFICATION AND CURRENT ENGAGEMENT

5.1 Stakeholder Identification and Analysis

The purpose of identifying stakeholders is to ensure equal and meaningful interaction, depending on the selected categories of stakeholders. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project.

A systematic approach is used to map the stakeholders based on the level of potential Project impacts. The preliminary identification of stakeholders was carried out at the initial stage of the Project (August – September 2025) using a wide range of methods, including:

- Analysis of publicly available information in media, social media, websites of local authorities, etc.;
- Analysis of previous stakeholder engagement;

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- First-hand insights gathered during the site visit and interviews in August 2025.

Stakeholder identification was carried out by an independent consultant, engaged by the Company to conduct the Environmental and Social (E&S) assessment of the Project in accordance with the EBRD requirements. Further updates and revisions of this SEP will be undertaken by OZhT as Project works progress and develops.

Based on this comprehensive analysis, a Draft Register of Stakeholders was compiled: preliminarily identified stakeholder groups are presented in the table below (Table 2). This register includes a detailed list of stakeholders, along with available contact information, and outlines their potential expectations and concerns. It also captures other relevant information necessary to facilitate effective stakeholder engagement and dialogue throughout the Project lifecycle. There are two types of stakeholders identified in this SEP:

- Primary stakeholders – affected or likely to be affected (directly or indirectly) by the Project (affected parties), or
- Secondary stakeholders – may have an interest in the Project (other interested parties), but are not necessarily directly impacted by the Project.

Data on stakeholders gained at the early stage of the Project will enable the Company to have an insight of those who have interest in and/or are concerned about the Project and, consequently, should be included in the engagement process.

The Company will be maintaining the continuous identification of Project stakeholders throughout the Project life cycle and adjust engagement methods as the Project progresses and as the needs and the interests of its stakeholders change over time.

Table 2: Key Stakeholder Groups

Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests
OZhT	Managing staff of the Company	Primary	Intracorporate engagement	Decision-making process Project implementation Stakeholder engagement
Local communities	Residents of settlements in the Project implementation area, including: <ul style="list-style-type: none"> ■ Kelessky district ■ Zhetisai district ■ Tolebiysky district ■ Saryagash district ■ Sairamsky district ■ Kazygurt district ■ Ordabasynsky district ■ Arys town akimat ■ Shardara district ■ Otrarsky district ■ Maktaaral district ■ Baydibek District ■ Tyulkubassky district ■ Sauransky district ■ Turkestan town akimat ■ Kentay town akimat ■ The city of republican subordination Shymkent 	Primary	Consultations and notification on the timing of the construction works Publications in the media Information on the Company's website Handling requests and grievances Warning signs at OZhT facilities	Information about possible impacts and positive effects Information on commencement of construction works and corresponding shutdowns Information about tariff changes Grievance redress mechanism
Electricity consumers – legal entities	Electricity consumers in the project areas, including: <ul style="list-style-type: none"> ■ Production facilities, ■ Other legal entities. 	Primary	Information on the Company's website and in the media Direct communication and notification on planned	Information about possible impacts and positive effects Information on commencement of

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests
			service disruption and back-up solutions	construction works and corresponding shutdowns Information about tariff changes
Electricity consumers – state bodies and institutions	Social infrastructure facilities and other state institutions connected to the OZhT power grids	Primary	Information on the Company's website and in the media Direct communication and notification on planned service disruption and back-up solutions	Information on commencement of construction works and corresponding shutdowns
Land users located near the Project assets	Owners of private residential land plot located in the protected zones of the Project facilities	Primary	Negotiations in accordance with the procedure ensuring impact avoidance and mitigation while agreeing safe access to the Company's facilities / assets Informing land users on siting optimisation and safe maintenance of existing facilities / assets Publications in the media Information on the Company's website Handling requests and grievances Warning signs at OZhT facilities	Ensuring safe and informed access to Project facilities by the OZhT without compromising land use by the owners / users Information about possible impacts and positive effects Information on commencement of construction works and corresponding shutdowns Information about tariff changes Grievance redress mechanism
	Owners of agricultural land, within which the Project facilities are located	Primary	Direct communication on construction schedule, impact avoidance and safety measures Informing land users on siting optimisation and safe	Ensuring safe and informed access to Project facilities by the OZhT Information about possible impacts and positive effects

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests
			maintenance of existing facilities / assets Information on the Company's website Handling requests and grievances Warning signs at OZhT facilities	Information on commencement of construction works Grievance redress mechanism
Public authorities and regulators	National, Regional and Local authorities	Secondary	Official reports, letters, phone or email, Meetings with authority representatives	Regulatory Compliance Projects aimed at improving quality of life for residents
Vulnerable groups	Stakeholders who are vulnerable in case of tariff increases <ul style="list-style-type: none"> ■ Low-income households, ■ Single-parent families, ■ Elderly people, Stakeholders vulnerable in the event of a power outage <ul style="list-style-type: none"> ■ Persons with disabilities. 	Primary	Consultations Direct communication Information on the Company's website Handling requests and grievances	Information about tariff changes and targeted assistance ⁴ Information on commencement of construction works and corresponding shutdowns Transparency of the Project life cycle Grievance redress mechanism
Local NGOs	NGOs promoting women rights NGOs supporting vulnerable groups	Secondary	Information on the Company's website Engagement of NGOs promoting women rights in	Information about tariff changes Information on gender equality and GBVH risks

⁴ In accordance with the Law on Housing Relations, art. 97, #4 low-income households may apply for compensation of utility bills

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests
			case GBVH complainants as a mediator	
OZhT personnel	<ul style="list-style-type: none"> Workers engaged in Project implementation Workers who will be dismissed as a result of Project implementation 	Primary	Internal communication channels, including communication through direct managers, HR department, top management, Labour Union	Collective Dismissal Plan Company's performance and Project timeline Workplace Safety Grievance redress mechanism
Contractors and supply chain	<ul style="list-style-type: none"> Suppliers and construction contractors 	Primary	Direct communication Tender process	Participation on Project implementation
	<ul style="list-style-type: none"> Contractors' and supply-chain workers 	Primary	Grievance redress Communication during site inspections and monitoring	Workplace Safety Labour and working conditions Grievance redress
Mass media	<ul style="list-style-type: none"> Printed mass media of regional, district, and municipal level Television Internet resources 	Secondary	Official press releases, letters, phone or email, Press conferences	Transparency of the Project life cycle
Lending Organisation	<ul style="list-style-type: none"> EBRD 	Secondary	Direct communication Communication with the involvement of an independent environmental and social consultant	Provide the loan to finance the Project, alongside certain environmental, social and technical requirements

5.2 Summary of Previous Stakeholder Engagement for the Project

OZhT has not yet engaged stakeholders regarding the Project, as it remains at an early stage. However, OZhT actively engages with stakeholders as a part of its ongoing activities

There are several means of communication:

- Engagement with media, publication of information on Company's website and in social media

The Company regularly shares information with local media regarding annual performance, implementation of investment programs, social events and activities.

The Company's website⁵ contains information about its current activities and investment programs, as well as a "Press Center" block containing information for consumers and interested parties. The Company also regularly publishes information related to its activities on social networks (Instagram and Facebook).

These communications serve to keep the wider public informed about ongoing and planned activities, highlight achievements in service quality and safety, and provide transparency around the Company's role in the energy sector. Company's social media is one of the channels to obtain stakeholders feedback on its performance.

- Handling requests and complaints from consumers and government agencies;

The Company has a formal complaint mechanism for external stakeholders through an internal department (Customer Service Center) to register, process, and resolve incoming requests, complaints, or inquiries from both individual consumers and government agencies. Applications and complaints are accepted, registered and reviewed within the established time frame. This system ensures accountability, helps identify recurring issues, and provides input into continuous service improvement. However, this approach does not include internal stakeholders and does not allow anonymous appeals to be considered.

- Annual surveys of consumers (legal entities) on their satisfaction with the quality of services provided;

Structured surveys are conducted with business clients to measure satisfaction levels, assess service quality, and identify areas for improvement. The results are analysed annually and feed into the Company's customer service strategy, enabling OZhT to adapt services in line with consumer expectations.

- Communication with consumers regarding power outages (planned and emergency shutdowns);

In accordance with national legislation, the Company notifies electricity consumers in advance of planned outages through interaction with representatives of local akimats (to inform local communities through multiple channels such as local social media groups, notifications on akimat websites and informational boards, direct communication to representatives of local communities) and through direct contacts with legal entities. Emergency shutdowns are communicated in real time using every communication channel.

- Public hearings (when required by the national legislation).

The Company conducts public hearings in accordance with national legislation for projects that are subject to environmental impact assessment, as well as during raising of electricity tariffs.

⁵ [ТОО «Оңтүстік Жарық Транзит» — Мы делаем вашу жизнь светлее!](#)

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These hearings allow communities and stakeholders to voice concerns, ask questions, and receive information about potential impacts and mitigation measures. Outcomes are documented and, where possible, integrated into Project design and management decisions.

Customer Service Center (CSC) is the key department to engage with consumers, it processes consumer requests and grievances on a daily basis (average time of grievance resolution is 2 to 3 days). It can also register grievances related to other topics (i.e., grievances related to land disputes) and redirect it to relevant department within the Company. There are several channels for receiving complainants:

- Hotline (telephone numbers are specified for each district),
- Social media (OZhT analyses comments in its social media accounts and if required registers it and provides a response; OZhT also monitors social media with regard to emergency shutdowns),
- Public reception.

The CSC acts as the **bridge between consumers, communications, and technical operations**, making sure complaints are both properly communicated and practically solved. According to the results of 2024 annual survey, most of consumers were satisfied with the quality of services provided, only complainants were related to provision of electricity in summer (shutdowns due to heat).

OZhT informs consumers about planned changes in the operation of the power grid through local akimats who distributes information to local residents. Users from among legal entities are informed in a written notification with the possibility of further agreement on the date of shutdown.

Engagement with internal stakeholders is carried out through internal communication channels. At the same time, the company does not have a documented procedure for dealing with complaints and appeals. Employees can file a complaint or appeal through the following channels:

- Meeting with a direct supervisor – direct communication on any issue related to working conditions
- Meeting with a representative of the HR department and an accountant – issues related to payroll and payments;
- The Conciliation Commission reviews individual labor disputes (there have been no such cases in 3 years).

6 STAKEHOLDER ENGAGEMENT AND DISCLOSURE

6.1 Disclosure Information and Placement Locations

The environmental and social package prepared under the requirements of EBRD is subject to public disclosure in Kazakh and Russian languages and consists of the following documents:

- Non-Technical Summary (NTS);
- Stakeholder Engagement Plan (SEP).

The data package will be available on the [Company's website](#) and in printed versions in the Company's offices and offices of following akimats: town of Arys, Baydibek district, Zhetysaysky district, Kazygurt district, Kelessky district, town of Kentau, Maktaaralsky district, Ordabasinsky district, Otyrarsky district, Sairamsky district, Saryagashsky district, Sauransky district, Sozaksy district, Tolebiysky District, Tulkubassky district, Shardarinsky district, Turkistan city.

The NTS and SEP will available at Company's website during the whole Project lifecycle and hard copies will be available in akimats during the disclosure period (30 days) and at least two weeks prior to the commencement of the public consultation meetings.

6.2 Stakeholder Engagement and Information Disclosure Program

This SEP addresses the engagement activities, the Project information disclosure and provides a high-level outline of the engagement to be implemented throughout all the phases of the Project.

Table 3 presents a preliminary Engagement Action Plan based on the data available at that early phase of the Project. This action plan is subject to amendment as required for each Project phase, and shall be further detailed and refined.

Table 3: Engagement Action Plan

Stakeholders	Organizational actions	Engagement Activities	Information to be Disclosed	Timeline / Frequency
Internal Project Shareholders (OZhT top management)	<p>Appoint a Social Manager / Community Liaison Officer responsible for implementation of the SEP and GRM.</p> <p>Create a Project-specific page at Company's website.</p> <p>Publish Project-related E&S documents in Kazakh, Russian and English languages on the Company's website including:</p> <ul style="list-style-type: none"> ■ Project overview and schedule, ■ NTS, SEP and brief information of GRM, ■ Contacts of person responsible for SEP and GRM. <p>Update NTS and SEP, following the consultations and comments received during the disclosure period.</p> <p>Include results of SEP implementation in the annual monitoring report and disclose it on the web site.</p>	Internal meetings with the Social Manager / Community Liaison Officer on a monthly and as-needed basis	Social Manager / Community Liaison Officer contact details	<p>Publication of information before the start of construction</p> <p>Meetings with the Social manager on a monthly and as-needed basis</p>

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Stakeholders	Organizational actions	Engagement Activities	Information to be Disclosed	Timeline / Frequency
Local communities	Provide Project field workers and security personnel with training on engagement with local residents (ethical behaviour and Project information)	<p>Inform stakeholders of E&S package disclosure and proposed consultation by means of the following:</p> <ul style="list-style-type: none"> ■ Publish an announcement on the Company's website and social media accounts ■ Distribute information through Akimats of Turkestan region and Shymkent ■ Publish an announcement in the mass media <p>Arrange consultation meetings on information disclosure with key stakeholders, including local communities.</p> <p>Inform local communities about planned power outages through local akimats, information on the Company's website, and announcements in the mass media/</p> <p>Inform stakeholders about the GRM procedure for external stakeholders on the Company web-site/</p>	<ul style="list-style-type: none"> ■ NTS, ■ SEP, ■ Project schedule, ■ Schedule of power outages, ■ Minutes of meetings, ■ Road Safety Management Plan, ■ Access restrictions to the construction site, ■ GRM procedure. 	<ul style="list-style-type: none"> ■ Employee training: before the start of construction works ■ Information disclosure: within one month of loan agreement signing ■ Informing about information disclosure: Within one month of loan agreement signing, no later than 30 days before consultations ■ Arrange consultation: before the start of construction works ■ Inform local communities about planned power outages: no later than 3 days before the shutdown⁶ ■ Inform about the GRM procedure: within one month of loan agreement signing and then semi-annually
Electricity consumers – businesses	-			
Electricity consumers – state bodies and institutions	-			

⁶ <https://adilet.zan.kz/rus/docs/V1500010403>

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Stakeholders	Organizational actions	Engagement Activities	Information to be Disclosed	Timeline / Frequency
Land users located near the Project assets	<p>Finalise a list of land users with contact details and summary of previous engagement</p> <p>Map out existing facilities and assets and identify access issues in terms of safety and land use restrictions in order to optimize siting where possible and agree access rights with the affected land owners and users</p>	<p>Arrange meetings with land users located in the protected zones of the Project facilities, in accordance with the internal procedure for obtaining written consent from land users. Explain safety and maintenance requirements and land user restrictions</p> <p>Inform about the GRM procedure for external stakeholders on the Company web-site.</p>	<p>Meetings agendas and actions to be agreed and undertaken by land users in case OZhT facility is located within their land plot</p> <p>Information on safety and maintenance requirements and land user restrictions</p> <p>GRM procedure</p>	<ul style="list-style-type: none"> ■ Arrange meetings: before commencement of construction works, ■ Inform about the GRM procedure: within one month of loan agreement signing; and then semi-annually.
Public authorities and regulators	-	<p>Interaction with local authorities</p> <ul style="list-style-type: none"> ■ Approvals and permissions ■ Informing about changes 	Information on compliance with national legislation	<ul style="list-style-type: none"> ■ In accordance with the construction and operation timelines
Local NGO	-	<p>Disclose Project-related information on the Company's website</p> <p>Engage with NGOs promoting women rights in case GBVH grievances requires mediation by a third party</p>	<p>Tariff increases</p> <p>GRM procedure</p>	<ul style="list-style-type: none"> ■ General disclosure: within one month of loan agreement signing ■ Mediation request: as necessary.
OZhT personnel	<p>Appoint a person responsible for implementation of internal GRM.</p> <p>Develop a Collective Dismissals Plan</p>	<p>Inform about the GRM procedure for internal stakeholders.</p> <p>Arrange consultations with OZhT workers as a part of Collective Dismissals Plan implementation,</p>	<p>Minutes of the meetings</p> <p>GRM procedure</p>	<ul style="list-style-type: none"> ■ Inform about GRM: within one month of loan agreement and then quarterly

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Stakeholders	Organizational actions	Engagement Activities	Information to be Disclosed	Timeline / Frequency
		inform workers on availability of training programs		<ul style="list-style-type: none"> ■ Arrange consultations: before collective dismissals
Contractors' personnel	-	Inform contractors' workers about the GRM procedure	GRM procedure	<ul style="list-style-type: none"> ■ Inform about GRM: within one month of loan agreement and then monthly
Contractors and supply chain	-	<ul style="list-style-type: none"> ■ Inform about tenders on the Company's website ■ Inform about the GRM procedure 	GRM procedure	<ul style="list-style-type: none"> ■ Inform about tenders in accordance with tender's procedures ■ Inform about GRM: one month of loan agreement and then semi-annually during the construction stage
Lending Organisation	Appoint person responsible for reporting on E&S performance	Inform about the Project progress and E&S performance	<ul style="list-style-type: none"> ■ SEP ■ ESAP ■ Report on Project compliance with EBRD environmental and social policies 	<ul style="list-style-type: none"> ■ Appoint person: one month of loan agreement ■ Reporting: annually

7 GRIEVANCE REDRESS MECHANISM

The scope of grievance redress mechanism (GRM) is to evaluate and address stakeholders' concerns regarding the Project activities.

The GRM for the Project will comply with the following key principles according to EBRD requirements:

- assigning a responsible person (GRM manager), team or function to organize the resolution of grievances,
- defined timeframes for acknowledgement of the receipt of complaints and its subsequent resolution,
- practical arrangements for maintaining confidentiality, reviewing and resolving grievances, including resources and organizational arrangements,
- information on the grievance mechanism that is readily retrievable from a company web site, locations where Project information in hard copy has been placed, and/or from company representatives⁷.

In accordance with international best practices, the OZhT Grievance mechanism will adhere to the principles of accessibility, anonymity, non-retaliation, confidentiality and sensitivity when dealing with cases of gender-based violence and harassment. The Grievance mechanism described in this section is designed to handle all types of complaints, including those related to gender-based violence, and allows complaints to be filed anonymously.

To ensure a safe and appropriate response to such sensitive issues, OZhT will appoint a trained female staff member as a gender coordinator. This person will be responsible for interacting with complainants on issues of gender-based violence and ensuring that complaints are filed and dealt with in a secure, confidential environment focused on the interests of the victims.

All complaints related to gender-based violence will be handled in strict confidentiality. The identity of the applicants will always be protected, and we will not tolerate any retaliatory measures of any kind. If necessary, GBVH cases will be referred to qualified personnel, including lawyers, psychosocial workers, and child protection specialists. These cases will only be handled by trained investigators, and serious incidents can be referred to the relevant national authorities or external service providers for further action. This approach reinforces the Company's commitment to creating a safe, inclusive and respectful environment for all stakeholders.

Collecting requests

Stakeholders may use the following options for filing complaints and appeals:

- In person during meetings with Company representatives – Social manager / Community Liaison Officer who will ensure documenting and investigating of all complaints raised by the residents during consultations. Social manager / Community Liaison Officer will be able to redress grievances related to any adverse Project impacts, including health and safety, GBVH, nuisance due to construction works, etc.;
- By submitting a request to the Customer Service Center through the hotline and in person.

⁷ Grievance management, guidance note, EBRD, 2012

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- Via partner institutions or trusted intermediaries, such as local community leaders, akimats or local NGOs promoting women rights.

If anonymous complaints are received by the Customer Service Center, measures will be taken to consider them along with other complaints; a complainant will be consulted to define a channel for providing him/her with results of grievance investigation.

These options are designed to make the grievance mechanism accessible, inclusive, and easy to use for all community members, including vulnerable groups

Registration of applications and work on the application

GRM manager will ensure that all complaints and appeals received from all channels are recorded in the Grievance register – an updated version of current registered of Consumer Services Center as provided in the Appendix 3.

GRM manager will ensure that all applicants receive a written confirmation on grievance receipt. A notification will be sent to the applicant (within 3 days of receipt) indicating the appeal identification number and the time of the response preparation in order to assure that the organization is responding properly.

If complaints related to accidents, unsafe conditions and other issues related to safety of the local population, confirmation will be made the same day of receipt of the request and complaint will be redirected to responsible persons immediately.

The scheme of the GRM process is presented below in the Figure 1.

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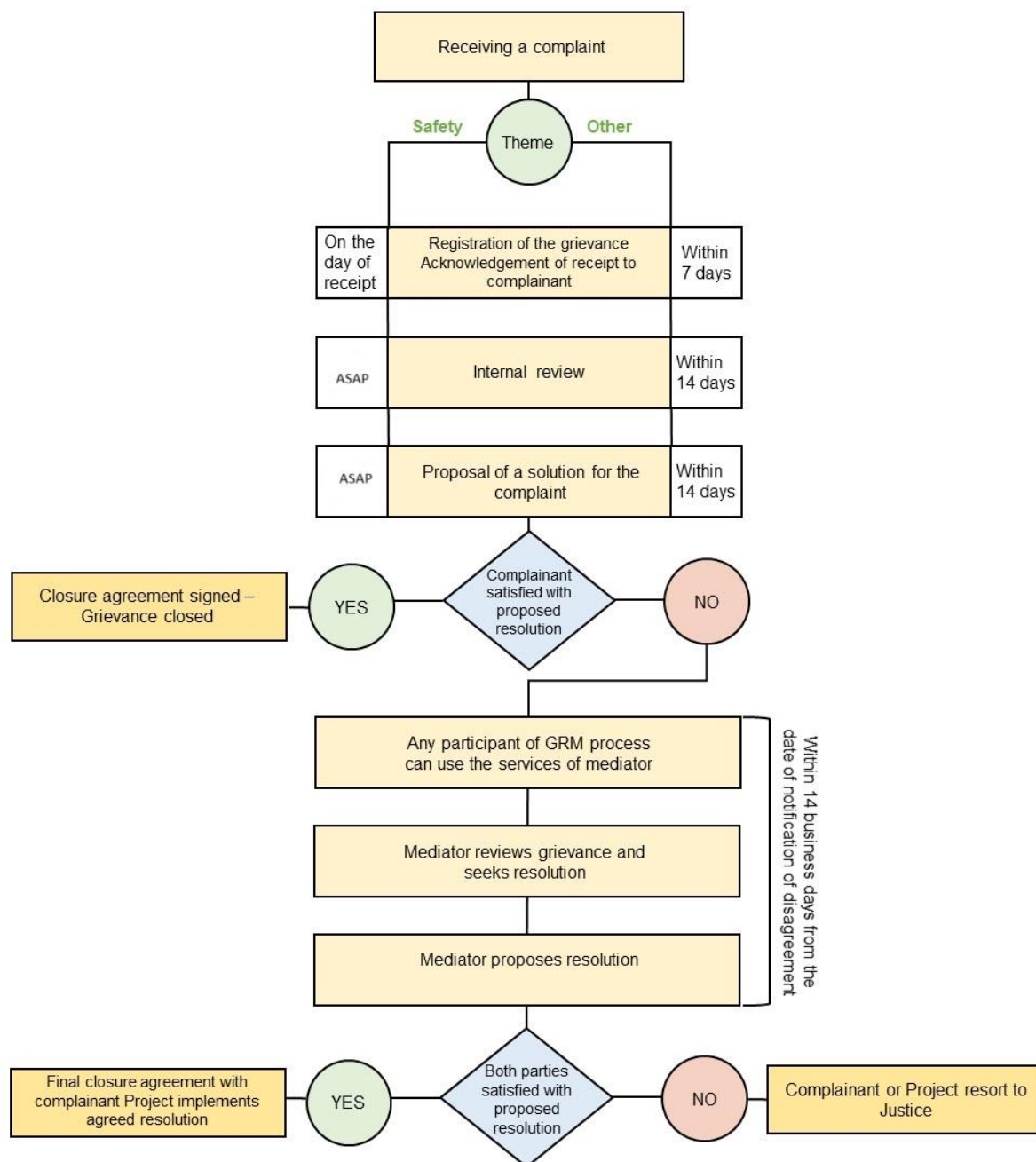


Figure 1: GRM Process Scheme

Investigation

Complaints received by the Customer Service Center will be reviewed by the Center's staff.

Complaints that are not related to consumer issues (for example, operational safety issues, violations of land users' rights) will be considered by a special representative of the Company. In cases where sensitive grievances have been raised (i.e., in relation to GBVH risks), SEP Lead is also responsible for ensuring that each case is handled sensitively and confidentially

All grievances (with the exception of those related to accidents and safety issues) will be reviewed by within 2 weeks of submission. If more time is required to consider the grievances, the applicant will be

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informed about this and about the expected response time. The requests which include circumstances which may trigger accidents and safety issues shall be reviewed as soon as possible.

Decision-making

The decision on the complaint will be communicated to the applicant in writing or orally, depending on the chosen format, but in all cases the Company will keep a written entry in the Grievance Register.

Responses to anonymous complaints will be communicated to complainant through agreed means of communication, or if appropriate will be posted on the information boards of local akimats or on the Company's website.

Resolving of appeals/grievances

If the grievance is confirmed, the complainant will be offered a solution within the prescribed period. The complainant will be asked to sign a statement expressing agreement with the proposed solution.

If the complaint remains unresolved and additional investigation time is needed, a letter is sent to the complainant requesting an extension of the time limit for reviewing the complaint, not exceeding 15 calendar days.

If the complainant is not satisfied with the proposed solution, further consultations with the mediator can be held until resolution. If the complainant is still unsatisfied, the complainant can seek external dispute resolution, including judicial options.

Closing the grievance

A grievance is "closed" when a resolution satisfactory to both parties has been reached.

8 PLAN IMPLEMENTATION, MONITORING AND REPORTING

In order to make the Stakeholder Engagement Plan functioning effectively, it is important to identify and appoint the appropriate staff to implement and manage the Stakeholder Engagement Plan.

8.1 Roles and Responsibilities

The Company has overall responsibility for the implementation of the Project and compliance with applicable environmental and social safeguards. Social Manager / Community Liaison Officer (CLO) – a person responsible for SEP implementation will be appointed to manage community engagement activities, including information disclosure, stakeholder engagement, and grievance management. A GRM Manager will be also appointed to ensure effectiveness of grievance redress process: Kokenova Bakhyt - manager of the Customer Service Center.

The designated contacts below will be responsible for ensuring all Project-related grievances are addressed in accordance with the national legislation and the EBRD's Environmental and Social Policy (Table 4). The specialist responsible for the stakeholder engagement and GRM hasn't been identified yet. More precise information regarding the appointment of responsible persons will be available at a later stage.

Table 4: Contact Details

Name of CLO	Address	Phone	Email
Adamidi Mira	Shymkent, Tokayev street, 27	+ 7 (7252) 777-333	<i>m.adamidi@ojt.kz</i>
Kokenova Bakhyt	Shymkent, Tokayev street, 27	+ 7 (7252) 777-333	<i>b.kokenova@ojt.kz</i>

A summary of the specific roles and responsibilities associated with the implementation of the Stakeholder Engagement Plan (SEP) is presented in Table 5:

Table 5: SEP Roles and Responsibilities

Role	Responsibility
Project Manager	<ul style="list-style-type: none"> Overall accountability for Project implementation in accordance with national legislation and the Lender's requirements. Ensure adequate resources (human, financial, and technical) are allocated for SEP implementation. Oversee the effective implementation of the SEP and the grievance mechanism. Periodically review the effectiveness of stakeholder engagement and the grievance mechanism. Ensure management of labour and working conditions, gender equality, human rights, and community health and safety in line with Lender standards. Supervise contractors and implement relevant Project activities and the Contractor Management Plan to ensure compliance with Project and Lender E&S requirements. Cooperate closely with the Project's E&S Manager and Social manager.

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Role	Responsibility
Social Manager / Community Liaison Officer	<ul style="list-style-type: none"> ■ Conduct community consultations and ongoing stakeholder engagement in accordance with this SEP. ■ Ensure timely updates are posted on the Project website. ■ Monitor and report on GBVH risks. ■ Provide ongoing support to survivors, witnesses, and/or whistleblowers as needed.
GRM manger	<ul style="list-style-type: none"> ■ Review and resolve grievances in a timely and transparent manner. ■ Monitor and report on the performance of engagement activities and grievance resolution. ■ Develop and deliver GBVH awareness and training materials for all workers. ■ Monitor and report on GBVH risks. ■ Serve as a focal point for women and survivors of gender-based violence and harassment (GBVH). ■ Implement a survivor-centred and confidential grievance process. ■ Provide ongoing support to survivors, witnesses, and/or whistleblowers as needed.

8.2 Monitoring & Reporting

Statistical reports on complaints/appeals will be prepared regularly based on the following indicators:

- The number of registered complaints/appeals during the reporting period;
- The number of closed complaints/appeals during the reporting period;
- The number of outstanding complaints/appeals and comparison with similar indicators of the previous period;
- Number of complaints/appeals by topic;
- The number of repeated complaints/appeals on the same topic or from the same interested party.

8.3 SEP Review and Amendment

The Stakeholder Engagement Plan is live document that will be used throughout the Project lifecycle. As such, it is necessary to update the SEP as needed to include any relevant changes, such as: changes in Project conditions, new requirements, new stakeholders, revision of methods, changes in the engagement activities, changes in the responsible staff, changes in the GRM process, etc.

As a result of an independent review or discussion with interested parties, there may be a need to update the SEP and GRM. The SEP will be reviewed once every three years with a view to continuous improvement.

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APPENDIXES

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Appendix 1. Grievance Form

Document number:	
<i>filled by an employee</i>	
Full name <i>Note: please, note that you are agreeing to the transfer of your personal data to third parties without your consent</i>	First and last name _____ <input type="checkbox"/> Yes, I request confidentiality. <input type="checkbox"/> No, confidentiality is not required
Contacts <i>Note: please, indicate preferred method of contact (mail, phone, email)</i>	<input type="checkbox"/> Address _____ <input type="checkbox"/> Telephone number / email _____ _____
Preferred language for communication	<input type="checkbox"/> Kazakh <input type="checkbox"/> Russian <input type="checkbox"/> Other (please, indicate) _____
A brief description of the accident / complaint: What is your concern / grievance? What happened? Where and when did it happen? Who did it happen to? What is the result of the problem? 	
Date of accident / complaint <i>Indicate date (month and year)</i>	
	<input type="checkbox"/> Once (date) <input type="checkbox"/> Occurred repeatedly (how many times?) <input type="checkbox"/> Occurs at the moment (current problem)
What in your opinion should be undertaken to solve the problem? 	
Sign: Date: Please send this form to the email address: m.adamidi@ojt.kz or by mail to the following address: Shymkent, Tokaeva Street, 27	

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Appendix 2. Example of the Grievance Register

Date of complaint receipt	Applicant's name	Applicant's contact information	Grievance Channel	Grievance Category	Description of Grievance	Person Responsible for Resolution	Solution	Date of Communication of Solution	Status

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