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Sustainability Guide of "Samruk-Energy" JSC
SE-R-01/03

Astana

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1. Purpose and Scope

1. This Sustainability Guide of "Samruk-Energy" JSC was developed in order to introduce a system of consistent and continuous adherence to the principles of sustainable development, elaborate effective stakeholder engagement system, confirm the Company's commitment to follow the standards in the area of sustainable development and ensure a long-term sustainable trend of improving key indicators, while balancing stakeholders interests.

2. The Guide is a basic document for improving the Company's performance in the area of sustainable development.

3. This Guide has been developed in accordance with the legislation of the Republic of Kazakhstan, taking into account the practice of sustainable development in the Republic of Kazakhstan and the world. The provisions of this Guide are applied taking into account the specifics provided by the legislation of the Republic of Kazakhstan. Any changes and additions to this Guide are made as necessary, taking into account changes in key strategic directions, external and internal environment, as well as reevaluation of risks in the area of sustainable development.

4. This Guide applies to the Company (Head Office and SA, 100% of voting shares (ownership interests) of which belong to the HO on the basis of ownership or trust management), and recommended to SA, less than 100% of the voting shares (participatory interests) of which belong to the HO on the right of ownership or trust management, as well as to suppliers, investors, partners of the HO and other stakeholders.

2. Definitions and abbreviations

5. The following definitions and abbreviations are used in this Guide:

Stakeholder engagement	-	a set of mechanisms and procedures that ensure the right of stakeholders to be heard, accountability to them;
RES	-	generation based on renewable energy sources: WPP, SPP, small HPP (up to 35 MW of installed capacity);
SA	-	Subsidiaries and affiliates;
Interested parties/stakeholder	-	individuals, legal entities, groups of individuals or legal entities that have direct or indirect influence, or may be affected by the activities of the organization, their products or services and related activities by virtue of statutory regulations, contracts concluded;
Interested parties/stakeholders map	-	Image to clarify the provisions of the Company's stakeholders, or a graphical representation of stakeholder groups;
Company	-	"Samruk-Energy" JSC group of companies;

KPI	-	Key performance indicator;
CSP	-	The Strategic Planning Committee of "Samruk-Energy" JSC Board of Directors
Materiality matrix	-	Graphic scheme of the material aspects;
UN	-	United Nations;
Supplier	-	individuals, legal entities, groups of individuals or legal entities that supply goods / services (including contractors);
Guide	-	Sustainability Guide;
Board of Directors	-	"Samruk-Energy" JSC Board of Directors;
Media	-	Mass media;
Socially responsible restructuring	-	The Company's efforts to mitigate the negative effects of and compensation for the workers and the local population in the course of large-scale layoffs, delocalization and closures, job cuts, reorganization;
BU	-	Business unit;
AA1000 standards	-	a series of international standards on accountability, stakeholder engagement and verification;
List of Material Topics	-	a list of sustainability topics identified as material through the materiality assessment process in accordance with the GRI Standard;
ISMS	-	Information Security Management System;
Strategy	-	"Samruk-Energy" JSC development strategy;
Sustainable development	-	combination and balance of aspects of activities whereby the use of natural resources, the direction of investment, the orientation of scientific and technological development, personal development and institutional changes are coordinated with each other and strengthen the present and future potential to meet human needs and aspirations;
Fund	-	"Samruk-Kazyna" JSC
ESG	-	Environmental, Social, Governance;
UN SDGs	-	United Nations Sustainable Development Goals
GBP	-	Green Bond Principles of the International Capital Market Association
GLP	-	Green Loan Principles
GRI	-	Global Reporting Initiative
IFRS S1	-	International Financial Reporting Standard IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information.
IFRS S2	-	International Financial Reporting Standard IFRS S2 Climate-related Disclosures
NO_x	-	Nitrogen oxides;
Scope 1–3	-	Greenhouse gas (GHG) emissions scopes: direct emissions (Scope 1), indirect energy emissions (Scope 2), and other

indirect emissions (Scope 3);

SO_x - Sulfur oxides.

3. Responsibility

6. The Board of Directors / Supervisory Board and the Strategic Planning Committee of the Company shall perform strategic management and control over:

introduction of sustainable development system and provisions of this Guide;

execution of the Plan of initiatives in the area of sustainable development (hereinafter – the Plan).

7. Chief executive officers (HO and SA) shall be responsible for:

control, timely execution of the Plan, as well as the introduction of principles in the area of sustainable development;

reliable disclosure of information;

compliance with the requirements of this Guide.

8. Chief executive officers of the HO and SA must:

ensure the development of an appropriate system for sustainable development and its introduction;

ensure the introduction of sustainable development principles.

9. The head of the BU in charge of the direction in the area of sustainable development shall be responsible for ensuring the management of this Guide.

10. BU of the HO and SA are responsible for meeting the requirements of this Guide within the scope of their competence.

11. The Managing Director of the HO responsible for the direction in the area of sustainable development shall be responsible for coordinating activities in the area of sustainable development.

12. Head of a BU of the HO who supervises the direction in the field of sustainable development shall carry out a full-scale inventory:

of existing policies, procedures and internal controls of the Company;

legislative requirements in the area of sustainable development.

13. Compliance Controller / Head of the Compliance Service of the HO shall be responsible for the process of internal communication with respect to ethical principles.

14. Press secretary of the HO/SA shall be responsible for external communications and public relations.

15. The Head of the Project Office of the HO / SA management shall be responsible for communication with the local communities on project implementation matters.

16. Heads of BU of HO and SA who supervise the direction in the area of sustainable development, shall be responsible for disclosing information on sustainable development within their competence.

4. Fundamentals of Sustainable Development

4.1. Sustainable development concept

17. The concept of sustainable development is in achieving the strategic objectives of an organization without compromising its sustainability in the long term, taking into account the interests of different stakeholders.

18. Sustainable development management is carried out on an ongoing basis, based on the assessment of material impacts, risks and opportunities, the precautionary principle, science-based data, and engagement with affected stakeholders.

19. The systematic management of sustainable development allows setting the organization's priorities for sustainable development at the strategic level, and then

drill them down to the program and project level;

regularly assess the effectiveness of activities in this area based on the established priorities and indicators,

prepare reports of different levels of details depending on the needs of users and to independently assure them when needed.

4.2. Sustainable development policy

20. Company's policy in the field of sustainable development implies wide application of aspects of sustainable development through the introduction of best practices in production, environmental initiatives, occupational health and safety and social services to ensure sustainable economic growth in the regions where the Company operates, at the same time keeping an optimal balance between the interests of stakeholders and the strategic objectives of the Company.

21. The principles of sustainable development should be introduced in the context of three levels:

Strategic integration - the principles of sustainable development are embedded in the Strategy (mission, values and strategic goals);

Operational integration - all corporate decisions are made by the Company's management relying upon the criteria of compliance with the principles and objectives in the field of sustainable development;

Cultural integration is implemented as part of training, posting articles on the corporate portal of the Company, as well as within the Code.

Sustainable development shall be integrated into:

1) the management system (the sustainable development management system shall clearly define and assign the roles, competencies and responsibilities of each governing body and all employees for the implementation of sustainable development principles, standards, policies and plans);

2) the development plan/strategy through the integration of Environmental, Social and Governance (ESG) objectives;

3) the risk management system (through the continuous improvement of environmental and climate risk management practices associated with climate change);

4) the investment decision-making process (the Company shall integrate the practice of analyzing material ESG factors and assessing ESG risks in order to identify investment risks and opportunities that are highly likely to affect the Company's performance);

5) the remuneration system for governing bodies and management (the Company shall develop and publicly disclose ESG objectives, and ESG performance indicators shall be used to assess the performance of executives);

6) key business processes, including planning (long-term, medium-term (five-year plan) and short-term (annual budget) planning horizons), reporting, human resource management, operational activities and other processes, as well as decision-making processes at all levels of management;

7) the system of regular stakeholder engagement, which includes the provision of relevant and reliable information, ensuring opportunities for two-way dialogue, raising awareness of environmental hazards and risks associated with the activities of portfolio companies, and establishing an effective grievance mechanism.

22. The Company integrates sustainability principles into its relationships with business partners and takes measures to ensure that these principles are taken into account and observed in the selection of business partners, engagement with them, and assessment of the outcomes of business relationships.

23. All information about the Company's principles, programs, reports and new projects in the social, economic and environmental areas is posted on the corporate website of the HO/SA in the section "Sustainable development" as it appears.

24. The Company annually publishes sustainability information as part of its Integrated Annual Report and other disclosures. Reporting on impacts is prepared in accordance with the GRI Standards, while disclosures for investors and providers of capital are progressively developed taking into account the applicable IFRS S1 and IFRS S2 Standards. In each case, the reporting boundaries, methodology, comparative information and the status of application of the relevant standard are specified.

4.3. Sustainable development principles

25. The Company's sustainability principles are based on its commitment to contributing to the 17 UN SDGs and adherence to the 10 principles of the UN Global Compact. These principles are reflected in respect for stakeholder interests, respect for human rights, openness, accountability, transparency, the rule of law, ethical conduct, zero tolerance for corruption, prevention of conflicts of interest, equal opportunities, non-discrimination, prohibition of sexual harassment, and other principles.

4.4. Risks in the field of sustainable development

26. Global factors of sustainable development may inevitably lead to constraints, difficulties and risks for business.

27. Environmental protection, occupational health and safety, interaction with the local population, infrastructure and social issues of the regions where a company operates - all this has a direct impact on long-term financial performance and sustainability.

28. The Company, by applying a risk-oriented approach in its operations, strives to achieve a sustainable increase in value and increase competitiveness in the long term.

To this end, the BU responsible for risk management together with heads of interested BU carries out an integrated risk assessment on an ongoing basis by using risk management tools and a systematic approach to sustainable development:

1) assessment of current and future risks associated with the effects of global factors of sustainable development;

2) forecasting of economic, social and demographic and ecological trends;

3) analysis of social, environmental and economic aspects of the Company's current impact on the region where it operates;

4) development of actions aimed at managing the Company's impact on the region of presence, risk mitigation and implementation of opportunities;

5) improving the risk culture in general, analyzing the effectiveness of risk management activities, identifying opportunities associated with current and future risks.

29. The BU of the HO responsible for sustainable development jointly with the Compliance Service of the HO forms, if necessary, updates the register of international and national legislative requirements for the Company and periodically, at least once a year, conducts an analysis of compliance with such requirements by SA.

30. The company analyzes key trends and risks in the context of sustainable development components, studies the experience of countries in transition to a low-carbon economy, and meets regularly with experts on energy, ecology and climate change.

31. Risk management is an integral part of sustainable development. The company declares its responsibility to all stakeholders and undertakes to timely evaluate, control and manage sustainable development risks, while the definitions in the context of three components are considered broader for both internal and external stakeholders.

Thus, the definition of "social risks" includes not only responsibility to employees / shareholders of the Company, but also such concepts as health and safety of the population, livelihoods of local communities, social connectivity, cultural resources, vulnerable groups, gender equality, risks arising in the supply chain and associated with non-compliance with relevant labor standards regarding the rights of suppliers.

Ecological risks are presented not only as an impact on the environment at the local level, but also on climate change in general. In this regard, the Company also considers climate-related risks in its operations, which refer to the potential adverse consequences of climate change for the organization.

Economic risks are expanded and presented not only as an economic impact of the Company’s specific asset on the local community but also on the whole country.

32. The Company has adopted a zero level of risk tolerance in respect of fraud and corruption schemes. The Compliance Service of the HO conducts security checks of third parties in accordance with the following criteria groups:

1) affiliation testing - check intercrossing in the context of the following information:

ownership structure of a third party and an affiliate of the company / employee of the company; ownership structure of a third party and politically significant persons;

2) checking the status of a third party in various lists and registers (lists of unreliable suppliers, bankrupt persons, bringing administrative/criminal action against officials, tax debts, lists of entities subject to international sanctions, etc.);

3) schemes that indicate a secret agreement between potential suppliers and organizations acting as clients (for example, different budgets, the participation of the same suppliers in the same tenders if one of the suppliers loses, etc.).

33. The security check procedure shall be applicable to all third parties1.

34. Sustainable development risks shall be analyzed by concerned BU with the assistance of the BU which is responsible for managing risks on a permanent basis at least once a year and as a result is reflected in the consolidated Risk Register of the Company.

4.5. ESG Data anagement and Inidependent assurance (opinion)

35. The Company is gradually establishing an ESG data management system in accordance with the requirements for the quality of non-financial reporting.

ESG data is collected by the Company based on existing internal reporting templates. For priority (material) indicators, the calculation methodology, data source, responsible data owner and collection frequency are being progressively defined. The methodology is updated as regulatory requirements, the Company's structure or data availability change.

The data is reviewed by the responsible BU during the preparation stage and subsequently re-checked by the relevant sustainability unit prior to disclosure. Non-financial indicators may be included in the scope of internal audit reviews in accordance with the annual internal audit plan.

Material ESG indicators are subject to independent external assurance annually on a sample basis, with the scope of coverage progressively expanded.

Where material errors or discrepancies are identified, previously reported data shall be corrected in the subsequent reporting cycle, with the reasons for such corrections disclosed.

4.6. Green financing policy and credibility of claims

36. The Company undertakes green financing in accordance with the legislation of the Republic of Kazakhstan, its Charter, the Green Financing Policy and other internal regulatory documents of the Fund and the Company, thereby contributing to the achievement of the UN SDGs. In issuing green bonds and obtaining green loans, the Company adheres to the GBP and GLP, including the four core components: use of proceeds, process for project evaluation and selection, management of proceeds, and reporting.

37. The proceeds are allocated exclusively to the full or partial financing or refinancing of projects/assets that meet the eligibility criteria established by the Company in the areas of renewable energy, energy efficiency, pollution prevention and control,

environmentally sustainable management of natural resources and land use, clean transportation, and green buildings. Project evaluation and selection are carried out by the Green Financing Working Group.

38. From the date of issuance of green bonds or the obtaining of green loans until their full repayment, the Company shall publish and maintain on its corporate website, on an annual basis and whenever material changes occur, publicly available reports on the allocation of proceeds and environmental impact. The reporting shall include disclosure of the net proceeds received under each Company/subsidiary instrument, the allocation of proceeds across eligible categories, and the balance of unallocated proceeds. Where possible, examples of projects and quantitative performance indicators shall also be provided, subject to confidentiality requirements and information availability. The first annual report on the use and management of proceeds shall be reviewed and signed by an independent reviewer to confirm the green status of the bonds. The verification of subsequent reports shall be at the Company's discretion. The Company may engage external reviewers to provide a Second Party Opinion, verification, certification, or a rating/green assessment. External reviews shall be published on the Company's corporate website and remain publicly available until the maturity of the relevant instruments.

4.7 Responsible Tax Conduct

39. The Company has implemented and applies a Tax Accounting Policy that ensures a consistent and systematic approach to tax accounting. The document has been developed based on the Tax Code of the Republic of Kazakhstan, relevant regulatory legal acts and IFRS requirements, and is approved by the Company's Management Board.

40. Oversight of the implementation of the Tax Accounting Policy is exercised by the Managing Director responsible for the areas of economics and finance. Responsibility for the accuracy of tax accounting and the reliability of reporting rests with the Head of the Accounting and Tax Accounting Department. The Policy is updated in response to changes in tax legislation or where necessary to ensure more accurate reflection of business transactions.

41. The Tax Accounting Policy is integrated with the Company's development strategy, corporate governance system and risk management framework. The Company's approach to taxation is based on strict compliance with applicable legislation, transparency and oversight of tax processes.

42. The Company continuously monitors changes in tax legislation, case law and guidance issued by competent authorities, and regularly assesses its tax positions to minimize risks and ensure the accurate recognition of tax liabilities in its financial statements.

Constructive and regular engagement with tax authorities at all levels is an important element of the implementation of the Tax Accounting Policy, helping to prevent potential adverse tax consequences in a timely manner.

4.8 Digital Responsibility and Critical Infrastructure Resilience

43. The Company ensures digital responsibility, information security and the resilience of critical information and communication infrastructure in accordance with the legislation of the Republic of Kazakhstan, internal corporate documents and applicable international standards, including ST RK ISO/IEC 27001.

44. The Company has implemented and maintains an Information Security Management System (hereinafter referred to as the ISMS), which provides for:

1) The development, approval and regular updating of internal information security documents;

2) The identification of information assets, designation of their owners and assignment of responsibility for ensuring their protection;

3) The identification, assessment and treatment of information security risks;

4) The planning, coordination and implementation of control measures;

5) The monitoring of information security risks and preparation of relevant reports;

6) The continuous improvement of the ISMS, taking into account changes in legislation, the technological environment, the nature of threats and the results of risk assessments.

45. Information security is ensured through the following key areas:

1) Information security management;

2) Technical information security measures;

3) Monitoring, control and response to information security incidents.

46. The Company applies technical and organizational information security measures, taking into account the scale and nature of its operations, the level of digitalization and the results of risk assessments. Such measures may include:

1) Antivirus protection of the corporate information network;

2) Establishment and protection of demilitarized zones (DMZs) using firewalls and other security tools;

3) Monitoring and filtering of email communications to prevent the spread of malware, unauthorized access and information leaks;

4) Protection against DDoS attacks and other types of network threats;

5) Protection of web resources and information systems;

6) Security audits, including penetration testing;

7) Provision of expert support and regular reporting on information security matters.

47. The Company takes measures to ensure the resilience of critical information and communication infrastructure, the continuity of critical information systems and their timely recovery following failures and incidents. These measures are regularly reviewed and tested, taking into account current risks and cyber threat scenarios.

48. The Company ensures the systematic enhancement of employees’ awareness of information security matters.

49. The effectiveness of the ISMS, technical security controls, incident response mechanisms and employee awareness-raising activities is assessed periodically. Based on the results of such assessments, the Company takes measures to address identified deficiencies and further improve its information security system.

5. Plan of initiatives in the field of sustainable development

5.1. The process of identifying the initiatives in the field of sustainable development

50. The process of identifying initiatives in the field of sustainable development has its own specifics for each organization, taking into account the geographical, cultural, legal features of operations, the ownership structure, type of business, the scale and nature of types of impact of SA.

To determine the list of sustainable development initiatives, a wide range of topics should be considered, including the development strategy, business model of the organization, significant topics from the point of view of sustainable development of the organization and stakeholders, the matrix of materiality and risks of the organization in terms of the three components (economic, environmental and social risks).

All initiatives are prioritized based on the importance of a particular initiative for all key stakeholders.

5.2. Planning of activities on implementation of initiatives in the field of sustainable development

51. Once sustainable development initiatives are identified, a plan for their implementation should be developed and executed. The plan outlines medium-term or longterm activities on implementing sustainable development initiatives. The plan includes the following:

1) a description of sustainable development initiatives and the objectives of the Plan;

2) an indication of the relationship of the Plan with the strategic objectives of the Company;

3) an indication of measurable and achievable goals in the medium and long term and the timing of achievement;

4) an indication of the evaluation methods of the effectiveness of the Plan, taking into account strategic objectives and key performance indicators;

5) distribution of responsibilities for the implementation of the Plan;

6) content of events;

7) an approximate estimate of expenses for implementation of activities and sources of funding (if applicable).

5.3. Key performance indicators in the field of sustainable development

52. KPIs in the field of sustainable development should be integrated into the system of long-term, medium-term planning and KPI system of the HO.

When developing KPIs, each SA must take into account the specifics of its operations and, accordingly, place emphasis and set thresholds. All KPIs of SA are set in

agreement with the BU responsible for the sustainable development of the Company.

Examples of KPIs in the field of sustainable development

1) Economic component:

Company's share in the electricity market in the Republic of Kazakhstan (%).

2) The ecological component:

Reduction of consumption and use of electricity at production site / reducing energy demand in the production of products or services;

Reducing greenhouse gas emissions.

3) Social component:

Zero mortality at the workplace;

Reduction of work-related injuries (number of cases);

Social stability rating (%);

Gender diversity (%);

Staff turnover (%).

5.4. Execution, monitoring and the report on execution of the Plan of initiatives in the field of sustainable development

53. The reporting periods for execution of the Plan of Sustainable Development Initiatives (hereinafter - the Plan) shall be twelve months of the calendar year.

The involved BU annually monitor the implementation of Action Plan's initiatives, following which the results of the Plan implementation are sent to the Unit in charge of sustainable development.

The deadline for submitting the report on the KPI / Action Plan for the year shall not be later than the second quarter following the reporting period.

The results of the execution of the Plan should contain factors affecting the performance of the Plan's indicators, detailed explanations of the deviations from the Plan, information on measures aimed at increasing the unreached indicators and measures, as well as on the existing risks of not achieving the Plan's indicators and measures in the expected forecast for the current year.

54. The BU responsible for sustainable development shall submit results of monitoring the implementation of the Plan based on the results of the reporting year to the Board of Directors/ Supervisory Board of the Company for its approval. After considering results of the reports on execution of the Plan by the Board of Directors/ Supervisory Board of the Company at year end, the BU responsible for sustainable development shall place the consolidated report at the HO/SA corporate website in Russian, Kazakh and English as a separate report or as part of the Company's Annual Report.

6. Corporate communications policy

55. Interaction with stakeholders is important for operations of any organization.

56. The Company ensures systematic, consistent and effective engagement among the executive body, the Board of Directors, the Shareholder and other stakeholders, based

on the principles of transparency, openness, consideration of legitimate interests and feedback, with the aim of improving the quality of decision-making and promoting sustainable development.

57. The Company ensures regular reviews of the effectiveness of its stakeholder engagement system, including an analysis of engagement results, incoming requests and feedback, as well as the channels and mechanisms used for engagement, with recommendations and measures developed to improve its effectiveness. The results of the analysis and proposals for enhancing the effectiveness of stakeholder engagement are submitted to the Board of Directors for consideration annually.

58. The purpose of interaction with stakeholders is to choose the strategic development of the Company and ways to improve its performance, as well as to assist it in achieving a level of sustainable development which brings a benefit to everyone and the Company and its stakeholders and society, since they have the ability to know, define and analyze:

needs, expectations and opinions of internal and external stakeholders;

difficulties and perspectives from the perspective of stakeholders;

the most significant issues that concern internal and external stakeholders.

59. The Company's corporate communications policy can be applied to all types of stakeholder engagement, including:

functional interaction;

interaction on specific issues (for example, on the protection of human rights);

interaction across an organization.

60. The provisions of this policy can be applied to both internal and external interaction, as well as for the relationship between them.

61. The Company's corporate communications policy is intended to inform stakeholders about the Company's methods of work, and in turn, stakeholders may identify and evaluate the quality of interaction with an organization, based on clear principles and related criteria, and comment on this matter.

62. The Company's interaction with stakeholders is based on the following principles:

respect and consideration of interests, opinions and preferences of

stakeholders;

providing stakeholders with information on a regular and timely basis;

responsible fulfillment of obligations assumed.

63. Each BU shall independently determine the frequency, degree and methods of interaction with stakeholders. The degree of effectiveness of the management system for interaction with stakeholders is an important factor for creating long-term value, achieving strategic goals and forming a positive reputation for the Company.

64. The basis for interaction with stakeholders is the identification of stakeholders that have a significant impact on the Company and the degree of stakeholders dependence on the Company, development of a materiality matrix and the Stakeholder Engagement Plan and/or Stakeholder Communications Plan.

65. In accordance with best practices in the area of stakeholder engagement (AA1000, GRI standards), the principle of "inclusiveness" is used to build effective interaction.

This principle takes into account interests of all stakeholders at all stages of the management of the Company.

The principle of "inclusiveness" is based on three basic principles of interaction:

"Materiality" (correct assessment of significance of issues for stakeholders and an organization),

"Completeness" (understanding the significance of consequences of a company's operations);

"Response" (demonstration of an adequate response).

Only adherence to each principle guarantees comprehensive, mutually beneficial and effective interaction with stakeholders.

66. The stakeholder map shall be approved by the Board of Directors / Supervisory Board of the Company.

67. The Company's engagement with local communities, including engagement mechanisms, feedback channels and information disclosure practices in the regions of operation, is conducted in accordance with the Policy on Engagement with Local Communities of the Samruk-Energy Group of Companies.

68. Figure 1 below provides a graphical illustration of the development of stakeholder engagement, comprising five stages.

Figure 1. Development of stakeholder engagement



Source: From words to actions. Stakeholder engagement. Volume 2: The stakeholder engagement

manual. Account Ability, the United Nations Environment and Stakeholder Research Associates, 2005. p.11.

6.1. Stakeholders Map

69. Stakeholders map is designed for systematization and visualization of information about Company's environment in order to develop methods of engagement with each stakeholder.

Stakeholder identification

70. The company determines the full list of potential stakeholders with whom it interacts in the course of its activities, with a description of the contributions of stakeholders and their interests. An example of the definition of a stakeholder map is provided below.

Table 1. Stakeholder Mapping

No.	Stakeholders	Stakeholders	Stakeholders
1	Shareholders (incl. investors)	Allocation of funds, replenishment of the authorized capital	Profit growth, timely payment of dividends, increase in the value of the Fund
2	Subsidiaries and affiliates	Compliance with shareholders interests	Assistance in dealing with government agencies, commercial interests
3	Employees	Human resources Loyalty	High wages, decent working conditions, professional development, career growth
4	Trade union	Promoting social stability, regulating labor relations and settlement of a dispute	Observance and protection of employees' rights
5	Partners	Joint implementation of projects Transfer of technologies, competences and innovations	Commercial interests
6	Consumers	Company loyalty Financial resources generated by way of purchasing goods and services	Commercial interests
7	Government agencies	State regulation	Tax revenues, economic growth, solving social problems
8	Competitors	Opportunities for future development	Increasing the share of market presence
9	Financial institutions including development institutions	International Grants Concessional financing of projects Credit lines	Timely payment of principal and interest, return on investment. Placement of free cash in deposit accounts, special accounts maintenance, participation in the implementation of the Company's programs
10	Suppliers	Efficiency of supply chain and value chain	Commercial interests

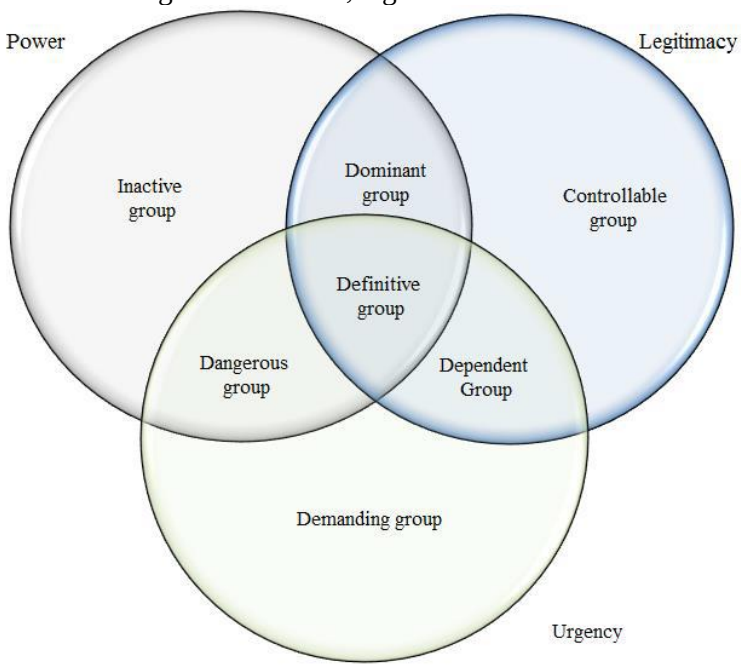
11	Population	Support in the place of business	Employment opportunities, solving social problems, transparency of the Company's operations, environmental protection
12	Public associations	Encouraging the application of high standards in operations Loyalty and cooperation	Achievement of goals and tasks of public associations
13	Mass media	Effective cooperation Favorable public opinion	Publications and information on the Company's activities, commercial interests
14	Affiliates	Mututal cooperation	Commercial interests

Evaluation of stakeholders' significance

71. The next step is an initial ranking of stakeholders in terms of importance for the Company according to Mitchell, Agle and Wood model.

72. The model is based on three factors (Figure 2): Power (the power of influence of a stakeholder on the company), legitimacy (legitimacy to give instructions) and urgency (the minimum required speed of response to stakeholder requests).

Figure 2. Mitchell, Agle and Wood model



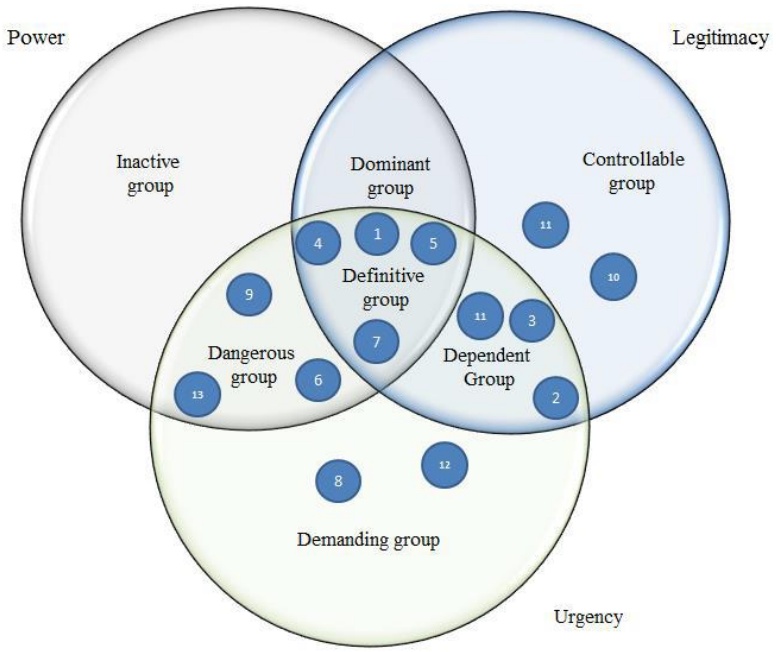
73. The latent category of stakeholders includes dormant group (has a power factor), discretionary (has a legitimacy factor of requirements) and demanding (has a factor of urgency). Since the organization is always limited in resources (financial, temporary, organizational, etc.) available for interaction with stakeholders, no actions are required in elation to the latent category. Category of expectant stakeholders includes the dominant group (that possesses power and legitimacy factors), dependent (that has legitimacy and urgency factors) and dangerous (that has power and urgency factors). The most significant for the Company is a definitive group of stakeholders that has all three factors. The requirements of this stakeholders' category must be met first.

74. Below is a table of classification of stakeholders according to Mitchell, Agle and Wood model (figure 3)

Table 2. Stakeholder Classification Table

No.	Stakeholders	Stakeholders' attributes			Classification group
		Power	Legitimacy	Urgency	
1	Shareholders	+	+	+	Definitive group
2	Subsidiaries and affiliates	-	+	+	Dependent group
3	Employees	-	+	+	Dependent group
4	Trade unions	+	+	+	Definitive group
5	Partners	+	+	+	Definitive group
6	Consumers	+	-	+	Dangerous group
7	Government agencies	+	+	+	Definitive group
8	Competitors	-	-	+	Demanding group
9	Financial institutions including development institutions	+	-	+	Dangerous group
10	Suppliers	-	+	-	Controllable group
11	Population	-	+	+	Dependent group
12	Public associations	-	-	+	Demanding group
13	Mass media	+	-	+	Dangerous group
14	Affiliates	-	+	-	Controllable group

Figure 3. Mitchell, Agle and Wood model



75. Thus, stakeholders that are significant for the Company are those who are, according to the expert analysis of the Company's employees, in the following areas: the definitive, dangerous, dependent with a breakdown into internal and external.

Internal - includes stakeholders that have a direct and significant impact on the

decisions taken by the Company or are under the influence of these decisions.

External - include stakeholders who have an indirect influence on the decisions made by the Company.

Table 3. Stakeholder Assessment

Stakeholders	Stakeholders' attributes			Classification group
	Power	Legitimacy	Urgency	
Closest circle				
Shareholders	+	+	+	Definitive group
Employees	-	+	+	Dependent group
Trade unions	+	+	+	Definitive group
Outside circle				
Partners	+	+	+	Definitive group
Government agencies	+	+	+	Definitive group
Financial institutions including development institutions	+	-	+	Dangerous group
Suppliers	-	+	-	Controllable group
Population	-	+	+	Dependent group
Mass media	+	-	+	Dangerous group
Consumers	+	-	+	Dangerous group

Assessment of impact and importance of stakeholders

76. The importance is the contribution of stakeholders to the Company's performance. It is determined by how the needs, problem solution and interests of each stakeholder can influence on performance results of the Company.

77. Impact is the power of stakeholder's impact on the company, its ability to influence the Company's operations, persons who make decisions on key issues of the Company.

78. The importance degree of stakeholder influence is evaluated by two parameters X / Y, where:

X = -5 ÷ +5 (in increments of 1 or smaller) - characterizes the degree of support / countering the Company's activities by a stakeholder and ranges from -5 (extreme ounter) to 5 (the highest level of support);

Y = 0 ÷ 5 (in increments of 1 or smaller) - characterizes the degree of stakeholder influence on the Company's operations and ranges from 0 to 5.

D = (± X + Y) - the parameter of stakeholder's importance.

Table 4. Assessment of Stakeholder Influence and Importance

Stakeholders	Attributes			
	Support degree (X)	Power of influence (Y)	Importance degree D = (±X + Y)	The degree of the Company's influence on

				stakeholders (from 0 to 3)
Closest circle				
Shareholders	+5	5	10	2
Employees	+2	3	5	3
Trade unions	+1	5	6	1
Outside circle				
Partners	+2	2	4	1
Government agencies	+3	3	6	1
Financial institutions including development institutions	+1	3	4	1
Suppliers	+2	2	4	2
Population	+2	2	4	3
Mass media	+2	5	7	1
Consumers	+1	5	6	1

79. Next, the Company's Stakeholder map is formed, where the X-axis reflects the degree of the Company's influence on stakeholders, and on the Y-axis - the importance of the stakeholders to the Company. Circle size - shows the level of the Company's stakeholder engagement: the smallest circle size shows a limited level of engagement, Engagement level increases along with increase of circle size. In addition, circles need to be differentiated in 2 colors, broken down into outer and inner circles.

6.2. List of Material Topics

80. Identification and ranking of significant (both for the Company and stakeholders) issues and topics is performed as part of stakeholder analysis.

81. Determination of significant topics and issues allows to effectively interact with stakeholders based on a clear understanding of their priorities.

The stages of determining the essential topics and issues are described below.

Table 5. Material Topics Identification Process

Stage Tasks Methodology	Stage Tasks Methodology	Stage Tasks Methodology
1. Identification of significant topics	Review of all sustainability topics relevant to the electric power sector and identification of potentially material topics for inclusion in the Report	Analysis of GRI Standards (including Topic Standards), industry-specific international standards, ISO 26000 and TCFD recommendations; Benchmarking analysis of leading sustainability reports published by

		peer companies (RWE, Enel, E.ON, Engie, Iberdrola, DTEK and Inter RAO)
2. Determination of key aspects	Assessment of the identified topics to determine their significance for stakeholders and the Company	Survey of internal and external stakeholders
3. Validation	Expert evaluation of the identified topics, with the participation of the Company's management, to ensure completeness and balance	Consultations with sustainability experts; Engagement sessions and discussions with the Company's internal stakeholders; Conducting the materiality assessment, including the review of topic-specific standards and the development of a list of indicators enabling the Company to disclose information on its impacts in relation to specific topics
4. Graphical scheme of significant topics (Matrix of Materiality)	Graphical representation of the results of the materiality assessment of the identified topics Impact Table	Visual presentation of the list of material topics; Identification, analysis and assessment of actual and potential impacts that the Company has or may have on the economy, the environment and people, including impacts on human rights, as a result of the Company's activities or business relationships.

82. As a result of the joint work of the Company's management and representatives of stakeholders, a "materiality matrix" may be formed, which gives a visual representation of sustainable development topics that are relevant to the Company and stakeholders and formed taking into account the recommendations of GRI standards as well as using the developed stakeholder questionnaire (see annex 1). The Company's Material Topics Matrix shall include GRI topics, topics from the relevant Sector Standard, as well as topics that have received a significance score above 4 (four) points for both the Company and its stakeholders based on consultations and survey results. If a topic identified in the relevant sector standard is determined by the Company to be non-material, the Company shall provide an explanation for such determination. Where necessary, the threshold score may be revised following consultations with experts and the Company's management in order to ensure more comprehensive disclosure of information.

6.3. Stakeholder Engagement Plan

83. Stakeholder engagement is an inseparable element in the activities of any organization. In order to conduct an effective dialogue with stakeholders, the Company develops Stakeholders Engagement Plan (SEP). SA develops Stakeholders Communication Plan as well as the SEP for each new major investment project in the event of their implementation.

84. SEP is reviewed on an ongoing basis and is updated at least once a year.

85. The objectives of SEP are:

1) to set the framework for identifying, analyzing, presentation, prioritizing and interacting with stakeholders at the local, regional and national levels;

2) to provide a strategic SEP that meets international standards and ensures a process of regular, open and transparent stakeholder engagement;

3) to ensure the proper identification and involvement of all stakeholders,

4) including vulnerable groups;

5) to determine functions and responsibilities when executing SEP, including monitoring and responding to feedback and complaints from stakeholders;

6) to control over SEP implementation process and its execution results;

7) to identify and address critical issues, mitigate social and environmental risks and increase social benefits;

8) to provide a basis for creating effective, long-term relations with stakeholders in the form of dialogue and bilateral information exchange in order to build confidence and minimize business risks;

9) to identify the mechanism for the exchange of information, the collection and analysis of feedback and recommendations from stakeholders, the resolution of issues raised by stakeholders, and the provision of reporting;

10) to assist the Company in understanding stakeholders expectations;

11) to provide stakeholders with an opportunity to participate in the assessment of the project's impact and development of appropriate risk mitigation measures for major capital projects;

12) to guide on documenting the interaction, monitoring of stakeholders, as well as guidance on the provision of reporting and monitoring of SEP execution.

86. Monitoring of the SEP is carried out on a regular basis by the Company and by each SA implementing a major investment project, but not less than 1 time per year, and is approved by the Board of Directors / Supervisory Board of the Company within 2 months following the reporting period. SA on a regular basis monitor the implementation of the Communication Plan and, by the end of the year, submit it for approval to the Board of Directors / Supervisory Board of the SA no later than 2 months following the reporting period.

87. The SEP is developed by the entities of the Samruk-Energy Group based on the Stakeholder Map and includes the mechanisms and methods of engagement with stakeholders. Implementation of the SEP is monitored annually. Samruk-Energy JSC carries out such monitoring on an annual basis through the Stakeholder Engagement and Feedback Mechanism Report.

Minimum requirements for development of SEP

88. SEP must included the following: (but not limited to):

Structure of SEP;

General information and description of the project;

Principles of interaction with stakeholder;

Requirements for interaction with stakeholders;
Regulatory and legal requirements of the Republic of Kazakhstan;
Requirements of international financial organizations;
Identification and analysis of stakeholders;
Stakeholder engagement plan/program;
The mechanism for filing and reviewing complaints;
Monitoring and reporting.

6.4. The mechanism for filing complaints and proposals

89. Supporting mutually beneficial relations with external and internal stakeholders is paramount for the Company.

90. The Company intends to facilitate more prompt and effective resolution of individual and collective complaints through the introduction of the mechanism for submitting complaints and proposals (hereinafter referred to as the "Mechanism").

91. The mechanism makes it possible to involve decision-makers of an appropriate level in addressing issues raised, and to use an understandable and transparent process, free of charge and without harassment of applicants. The company guarantees protection from retaliation and harassment of anyone who faithfully leaves a message. Any alleged retaliatory measures or prosecution should be reported to the Fund’s or the HO Compliance Service to ensure prompt and proper response.

92. The mechanism allows:

timely responding and resolve conflict situations;

analyzing and taking precautionary measures with respect to the concerns of external stakeholders, the public and individual citizens;

strengthening the reputation of the Company and maintain its credibility as a socially responsible company.

The Procedure for submitting complaints/proposals

93. It is very important for the Company that all external and internal stakeholders be heard. The company values its reputation and insists on compliance of its employees and stakeholders with the highest standards of ethics and fair practice and all laws.

All stakeholders may report any actual or suspected cases of theft, fraud, corruption, violations of the fundamental principles of business conduct, the Code of Conduct, or the legislation of the Republic of Kazakhstan through the communication channels specified on the Company's/Subsidiary's website at the following link: https://www.samruk-energy.kz/ru/navigation-and-support/hotline call the number 800 080 47 47.

94. These types of communication work 24 hours a day, 7 days a week. An independent company processes all messages received. The messages received through the hot line are sent to the responsible employees of the Company's HO who can provide professional and confidential consideration. For the most efficient processing of the message, it is suggested to leave the contact information, and there is an option to preserve anonymity. If a stakeholder prefers not to disclose his name when submitting a message,

personal information will not be collected on the hotline and will not be sent to the Fund and further along the chain. Telephone calls to the hotline are not monitored and conversations are not recorded.

95. However, providing more detailed information and supporting documents will make it possible to review appeals effectively in the shortest possible time. Taking into account this fact, it is recommended that the following information be reflected in your appeal:

What happened?

Where and when did the incident occur?

Under what circumstances did you become aware of the incident?

Who was involved in the incident?

Is the incident over, or is it ongoing?

What supporting documents can you provide? (for example, contracts, correspondence, photographs, etc.)

Other additional information.

96. The hotline is available for both internal and external stakeholders.

The procedure for processing complaints

97. An external independent company shall receive and process all information in order to ensure confidentiality. This company shall draft a report on incoming appeals daily and send it to the Fund's compliance service. Employees of the Fund's Compliance Service shall analyze appeals and send them to the Company's CEO and Compliance Service (and further, if necessary, to the relevant head of the contractor's department) for review and confirmation of the facts.

98. The timing for consideration of appeals depends on many factors, including the completeness and accuracy of the information indicated in the message, on the availability of supporting documents, and on the type of violation. In case of non-confidential reporting, a complainant receives a written response from the Compliance Service of the HO based on the results of inspection performed. In case of confidential reporting, a complainant receives a written response from an independent company that registered an incoming complaint.

99. The Compliance Service of the HO shall register all complaints in a separate complaint database indicating:

registration number;

the date of registration;

the main point or nature of complaint / proposition;

date of sending of receipt acknowledgement;

the date of review completion;

the result of consideration of a complaint / proposal;

proposed solutions;

notification of satisfaction of a complaint from the applicant or the reason why the complaint was not satisfied.

100. Compliance Service of the HO shall ensure the dissemination of information on the procedure for filing and reviewing complaints among local residents and employees at all facilities of the Company and other public places (including corporate website and mass media, if necessary).

Improving the efficiency of stakeholder engagement

101. In order to increase the efficiency of stakeholder engagement, the Company quarterly monitors complaints and appeals received through all communication channels. Monitoring of complaints and appeals allows the Company to respond in a timely manner to areas in which there is a concern of stakeholders, and to take measures aimed at improving them.

102. BU responsible for sustainable development, at least once a year, forms and no later than 2 months following the reporting year, submits for approval to the Board of Directors of the Company a report on the effectiveness of interaction with stakeholders, containing conclusions of quarterly monitoring and recommendations for improving the interaction process.

103. Quarterly accounting of complaints and appeals is carried out in the database of complaints and appeals specially created for these purposes.

7. Corporate social and environmental responsibility policy

104. The Company being aware of social and environmental responsibility of business, in order to provide the society with maximum benefits from its operations, accepts voluntary obligations for responsible participation in the life of the Company's employees, the population in the regions of the Company's operations and the society as a whole.

105. Taking into account the significant influence of the Company on the development of all sectors of the country's economy, on October 5, 2011 the Company joined the UN Global Compact, following the 10 principles of the Global Compact in its strategy and day-to-day activities, within its sphere of influence.

106. The Company made commitment to comply with the following principles:

1) In the field of respect for human rights: to support and respect the observance of human rights proclaimed by the international community; to ensure their non-involvement in violations of human rights.

2) In the field of labor relations: to support freedom of association and the recognition in practice of the right to collective bargaining; to advocate the abolition of all forms of forced labor; advocate the complete elimination of child labor; to advocate the elimination of discrimination in the field of labor and employment.

3) In the field of environmental protection: to promote the prevention of negative environmental impacts; to take initiatives aimed at increasing responsibility for the state of the environment; promote the development and dissemination of environmentally sound technologies.

4) In the field of combating corruption: to combat all forms of corruption, including extortion and bribery.

107. The Company shall undertake to be socially responsible for the restructuring of its divisions and controlled entities:

in case of mass release of workers, in addition to compliance with the law, strive to take all measures for the maximum possible employment of the workers released;

inform in advance about the Company's plans to reduce jobs, finance retraining of employees, create new jobs.

7.1. Labor remuneration and motivation policy

108. The company shall observe the following labor remuneration and motivation policy:

1) The unity of labor remuneration and motivation policy in the applicable standards and mechanisms of remuneration for the Company's employees;

2) The establishment of a minimum guaranteed wage levels for all employees of the Company at a level exceeding minimum wage established by law, assuming the necessity to meet basic needs and providing a certain income considering local conditions;

3) Wage indexation based on the consumer price index;

4) Periodic salary increases due to better performance;

5) The use of flexible bonus payment systems for the purpose of account of the individual labor contribution of an employee;

6) Fairness and unity of labor remuneration and motivation of employees and its competitiveness at the republican level;

7) Confer corporate and industry awards.

109. The Company ensures fair and transparent remuneration practices, taking into account employees' qualifications, professional competencies, the complexity and level of responsibility of their work, individual contributions and performance results, as well as the corporate remuneration approaches applied. Salaries, incentives, benefits and other forms of monetary and non-monetary compensation are provided in accordance with consistent principles and without discrimination.

7.2. Training

110. The Company ensures equal access for all employees to training, professional development and career advancement opportunities based on their professional competencies, qualifications and work performance, regardless of gender, age, nationality, race, religion or other characteristics unrelated to the employee's professional qualifications and merit.

111. The Company shall implement the program for training and development of employees to perform current and future business processes in accordance with individual employee development plans, career plans of employees who are in the Company's personnel reserve;

112. The Company shall cooperate with educational organizations of the Republic of Kazakhstan to improve the level of graduates' training.

7.3. Policy in relation to young employees

113. The company declares its intention to attract and retain young, talented employees, create jobs for young employees, develop a mentoring institute, train gifted school graduates in higher educational institutions of the Republic of Kazakhstan, near and far abroad according to majors of power sector.

7.4. Equal opportunity and gender equality

114. The Company creates an inclusive working environment based on the principles of respect for human dignity, equality, diversity and equal opportunities, and takes measures to prevent discrimination, harassment and other forms of unacceptable conduct.

115. On March 7, 2019, the HO signed a statement in support of Women Empowerment Principles, developed within the UN-Women Partnership and the United Nations Global Compact.

The company aims to develop human rights policies and focus on key issues related to promoting gender equality in the workplace, empowering women.

116. The signing of this statement demonstrates the Company's commitment to the principles of gender equality, as a key element of sustainable development, and the conviction that organizations that provide equal opportunities for women and men are more successful and achieve better results.

117. The company is guided by the following principles:

1) Formation at the management level of the company of the active support of measures to ensure gender equality;

2) Fair treatment of women and men at work; respect and support for human rights and non-discrimination;

3) Ensuring health, safety and well-being for all workers - men and women;

4) Promoting education, professional development and professional growth of women;

5) In the field of business development, supply chain and sales, the use of practices that promote the empowerment of women;

6) Promoting equality through local community initiatives;

7) Assessing results and informing the public about progress towards achieving gender equality.

7.5. Wellness, sports and recreation organization

118. The Company implements the following activities for the purpose of health improvement, sports and recreation organization:

1) Provision of additional days to the paid annual leave for length of service.

2) Organization of leisure to employees at the corporate level;

3) To include in the budget the funds for reimbursement of employees expenditures for sports and recreational activities;

4) Carrying out sports and recreation activities and the development of mass sports among the employees and their families, providing them with access to sports infrastructure, organizing training and competitions;

5) Conduct a systematic propaganda of healthy lifestyle among employees in the corporate media;

6) Annual allocation of funds for holding of cultural events, purchase of New Year's gifts, purchase of gifts to the Power Engineers' Day;

7) Organization of events for school children's rest during summer vacations in health resorts of the Republic of Kazakhstan;

8) Partial reimbursement of cost of vouchers for health resorts and children's healthcare centers for disabled children and orphans of the Company's employees.

7.6. Corporate Social Security and Insurance

119. The Company implements the following activities for the purpose of corporate social security and insurance:

1) Providing employees with medical care as part of voluntary health insurance;

2) Payment of one-time allowance at birth and / or adoption of a child;

3) Provision of financial assistance to anniversaries (50, 60, 70 years);

4) Provision of financial assistance to employees at marriage registration;

5) Provision of financial assistance in the event of death of an immediate family member;

6) Provision of charitable assistance to families of died employees with underage children (once a year, by 1 September until the child turns 18);

7) Provision of medical assistance to employees as part of voluntary health insurance.

7.7. Social support of non-working retired employees and employees with disabilities

120. The Company in order to provide unemployed retiree and employees with disabilities with social support, implements the following activities:

1) One-time payment to a retiring employee;

2) Provision of financial assistance to the Company's retired employees on the occasion of national and state holidays of the Republic of Kazakhstan and the Power Engineers' Day;

3) Invitation to non-working retired employees of the Company for holidays and celebrations held by the Company to provide moral and psychological support;

4) Payment of , to the extent possible, financial assistance to employees with disabilities (who became disabled during employment with the Company and left job) for medical care, additional food, purchase of medicines, training for another profession, if a disabled person needs these types of assistance and not receiving them free of charge.

121. The Company creates conditions for the employment and professional integration of persons with disabilities and consistently eliminates physical, technical and other barriers that may hinder their full participation in the workplace. The Company implements relevant programmes aimed at employing persons with disabilities, adapting workplaces, ensuring an accessible environment, and providing social guarantees and benefits.

7.8. Industrial safety, occupational health and safety

122. The Company shall be directly responsible for creating safe and healthy working conditions for its employees, as well as for informing, training, supervising and advising its employees on health and safety issues. The Company recognizes the importance of early prevention or mitigation of adverse impacts on the health and safety of employees, contractors and the public. Therefore, the BU responsible for occupational health and safety (further referred as OHS) carries out the following work (but not limited to):

1) analysis of hazards and risks for individual occupations and jobs;

2) assessment of potential impacts and risks caused by hazardous natural phenomena, such as earthquakes, landslides or floods;

3) provision of personal protective equipment, clarification of the requirements for the use of individual protective equipment, and ensuring the use of personal protective equipment;

4) safety training for all personnel, that take into account the dangers and risks of their work;

5) the development of an accident investigation program, the recording of incidents, including: the total number of hours worked, serious injuries, lost time and incidents that could lead to injuries, etc.;

6) development of a medical examination program for employees;

7) ensuring the introduction of a system for issuing work permits, covering both employees and contractors, for hazardous tasks, such as working in confined spaces;

8) development and implementation of procedures "blocking and installing warning signs";

9) hazard monitoring at the workplace;

10) placement of safety signs (fire safety, emergency response, noise, smoking, etc.), where necessary;

11) development of action plans in case of emergencies, major industrial accidents.

123. In cases of an accident, injury and illness, the BU responsible for occupational health and safety shall be obliged to study, document, analyze the results and take measures to prevent recurrence and, if required by law, notify the relevant authorities and cooperate with them.

124. The BU responsible for occupational health and safety shall conduct regular monitoring of firefighting system / equipment as required, including fire extinguishers in HO and all SA, provide appropriate training for personnel.

125. The Company shall identify and evaluate project risks and adverse effects on the health and safety of population groups in the areas where SA operate, and shall develop protective, preventive measures and mitigation measures commensurate with impacts and risks. The Company shall cooperate with relevant authorities and other stakeholders, as appropriate, on mitigation measures and plans.

7.9. Safety of facilities in accordance with voluntary principles on security and human rights

126. The Company recognizes the importance of ensuring and managing the safety of its production facilities, in connection with this the Security Service of the Company shall take the following actions:

1) identification and assessment of security risks associated with political, economic, civil or social factors;

2) consultations with local communities on the impact of security measures on them;

3) control over private security services providers in order to fulfill their obligations on ensuring security in line with the voluntary principles of security and human rights.

Where necessary, the Company shall engage private security service providers among the local population.

4) equipping with a video surveillance system, burglar and fire alarm, lighting, IT security;

5) ensuring the maintenance of the rule of law, including the protection of human rights and the prevention of actions that threaten the Company's personnel and facilities;

6) the Company's compliance with the following safety ensuring criteria: (a) persons who were involved in human rights violations in the past shall not be hired to provide security services for the Company; (b) force is applied by the Security Service only when it is strictly necessary and proportionate to the threat. In cases where physical force is applied, such incidents shall be reported to the relevant authorities and the head of the security service of the Company's HO. In case of use of force, medical assistance must be provided to injured, including offenders.

7.10. Social investments projects

127. Company needs to develop, periodically update and publish the Company's Social Investment Projects in the "Sustainable Development" section on the corporate website, which should contain information on community development, goals, methodology, target dates. The development of the social investment program might include the following procedures:

an assessment of the expected impact on the social environment;

liasing with an expert team of environmentalists (and all other evaluation teams) so that management plans include social aspects of the impact on ecology and biodiversity (in case of development of ecological projects);

development of basic social indicators that are appropriate to decision making and

documenting of social changes (i.e. collection of data on key social factors to record the condition prior to impact);

definition of changes and their introduction into the project, implementation of measures aimed at reducing social consequences;

identification of stakeholders, description of their interests, relationships and potential mutual impact;

assistance to involved communities in understanding the social impact of the proposed project;

Increase in local content and volume of purchases of goods and services from local suppliers;

monitoring of social issues;

development and implementation of social investment programs with the support of SC-Trust;

identification of issues and / or obligations related to the control over social impacts.

7.11. Guidelines for suppliers

128. Being a Company that adheres to high standards of ethical conduct, responsible for ensuring that any areas of its business segments do not directly or indirectly infringe pon human rights, for the purpose of strengthening relations with Suppliers, the Company developed guidelines for Suppliers (hereinafter referred to as "SG").

129. SG are based on the belief that corporate social responsibility is crucial in securing long-term commercial success and should be available in relationships and actions that we do in the market, in the workplace and in society.

The Company expects that Suppliers, in turn, will ensure the understanding and fulfillment of the requirements set forth in these SP:

1) The Company shall support the hiring of Suppliers on fair terms that are consistent with the commitment to respect for human rights in the workplace.

2) The Company and Suppliers shall avoid the occurrence of situations that result in a conflict of interest.

3) The Company shall abide by employment and labor laws, including those relating to working hours, remuneration and representation of third parties.

4) The Supplier shall comply with all applicable to it laws, rules and other standards, and the requirements related to the production and sale of its products, when carrying out supplies and delivering services to the Company.

5) The Company expects that Suppliers will evaluate their employees based on their ability to perform the work assigned to them, and not because of their physical and / or personal qualities or beliefs, by implementing the principle of excluding discrimination based on race, color, sex, religious beliefs, political beliefs, national origin or sexual orientation.

6) The Company expects that Suppliers will provide their employees with a safe workplace, and implement procedures that minimize the risk of accidents occurrence, causing harm to health.

7) The Company expects that when conducting business, Suppliers will not use child labor, nor will they tolerate physical or other unlawful abuse of the right or harassment of employees, or use of various forms of forced labor in any of Supplier's activities.

8) The Company expects that Suppliers will pay fair and competitive remuneration to their employees in full compliance with the applicable law, and will offer them opportunities to develop skills and capabilities.

9) The Company expects that Suppliers will respect employees' right to appoint a third party to represent their interests and bargain collectively in accordance with current law relating to such Supplier.

10) The Company expects that the Suppliers will ensure protection of the environment, as a minimum, comply with requirements of environmental protection legislation and other regulations adopted in the Republic of Kazakhstan.

11) Employees of the Company shall be prohibited from accepting any gifts from Suppliers, except for business courtesies that are reasonable and acceptable under certain circumstances in accordance with the Law on Combating Corruption of the Republic of Kazakhstan.

12) The Supplier and the Company shall maintain reliable reporting on all matters relating to the supplier's business relationship.

130. The BU of the Company responsible for interaction with the Suppliers shall maintain and timely update Suppliers database containing the following information:

1) the name and address of a Supplier;
2) the type of services provided;
3) address and data of contact persons;
4) the name and position of the hiring employee;
5) whether the information provided was verified;
6) schedule of audits;
7) management of a contractor;
8) the place of work / services provided;
9) any other information necessary for supervising a contractor.

7.12. Acquisition of land, forced relocation and economic displacement

131. The Company is wholly based on principles of respect for human rights and freedom and, in particular, the right to adequate housing and the continuous improvement of living conditions. In this regard, the Company seeks to prevent, or, if it is unavoidable, to minimize involuntary resettlement by considering alternative options for maintaining the Company's projects. Otherwise, the Company shall offer compensation for loss of property and other assistance to all relocated persons and groups of the population in the event of an economic opportunity of the Company.

7.13. Project management

132. The introduction of sustainable development principles in project management practice shall serve as a tool for implementing the value-oriented strategy of the Company. The company, while not undermining the economic nature of operation, shall seek to take into account the aspects of sustainable development throughout all stages of the project: from idea to operation.

133. The Company shall strive to ensure that its investments contribute to the development of production and economic base in the regions where it operates, nature conservation and exercising the right to work.

Pre-investment period

134. The Company shall adhere to main provisions of the precautionary principle. Prior to launch of new projects and facilities, the Company shall conduct the following procedures:

1) social and environmental impact assessment and risk analysis in the following areas: (PO, BU responsible for risk management of the Company):

a) health and safety of local population;

b) well-being of vulnerable groups;

c) gender equality;

d) forced relocation;

e) impact on indigenous peoples;

f) access to socially important institutions (hospitals, schools, markets, etc.);

g) economic activity of the region;

h) cultural heritage;

i) resource efficiency, prevention and control of environmental pollution;

j) climate change risk (for major projects);

k) biological diversity (minimum 1 year of data collection for each wind power plant).

2) Development of actions aimed at reducing the impact, for each project (PO, BU responsible for risk management of the Company).

3) Development and introduction of "incidental finding" procedure which will be used during performance of all construction works in order to take necessary actions in case of revealing archaeological finds (PO).

4) Develop and implement an emergency response plan (fires, floods, spills of hazardous substances, severe injuries or deaths, or other events that may occur during the project lifetime) together with responsible authorities and local communities. Conduct trainings and exercises on a regular basis (BU responsible for OHS of the HO).

5) The development of SEP with a description of stakeholders, methods of interaction with them and a feedback mechanism (see SEP section, PO for the development of SEP of SA).

6) Development of a non-technical resume (on the Company's website) and / or leaflets for communities for each new construction project, including: project description, EIA process, environmental and social benefits / impacts, mitigation measures and contact information for communication (PO).

Investment period

135. The Company shall:

1) monitor the use of funds in accordance with the schedule and volumes in accordance with the Investment Policy of the HO and the Rules for evaluating the effectiveness, preparation, formation and monitoring of the implementation of the Company's investment programs;

2) monitor the compliance with the environmental legislation of the Republic of Kazakhstan and other internal environmental standards of the project (BU responsible for environmental protection of the Company).

3) monitor Suppliers' compliance with SG (BU responsible for liaising with Suppliers of the Company);

4) monitor the implementation of the project's SEP (PO).

Post investment period

136. If, in the case of an investment, a legal entity is established, the HO shall send obligations for introduction of sustainable development system to this organization.

137. If a project is implemented at existing subsidiaries and affiliates, the BU responsible for the sustainable development of such an organization shall carry out the activities set out in the Initiative Implementation Plan, SEP and other in-house regulations of SA.

7.14. Environmental responsibility

138. Environmental protection and the rational use of resources play an important role in the Company's operations. To manage the environmental aspect, the Company created an environmental management system (EMS), which is an integral part of the corporate governance system and an essential part of the non-financial risk management system. The Company's EMS shall be constantly assessed for compliance with the best world practices with the involvement of independent international consultants and gradually improved. The ISO 14001 "Environmental Management" standard shall be implemented at all SA that are engaged in production activities.

139. The Company identified the following priority areas of development in the environmental field in accordance with the Strategy and Environmental Policy of HO:

1) Monitoring, assessment, and regular reporting on environmental impact indicators;

2) Assessment of environmental impacts of any planned economic activity;

3) Conducting activities in compliance with the legislative requirements of the Republic of Kazakhstan and other commitments undertaken by the Company;

4) Progressive reduction of the environmental impact of operational activities, including the reduction of emissions, discharges, and waste generation, through the introduction of new technologies and the use of renewable energy sources;

5) Development of an environmental management system and implementation of international environmental management standards;

6) Transparency and accessibility of environmental information, and prompt disclosure to all stakeholders of any incidents, their environmental consequences, and mitigation measures;

7) Stakeholder consultation on environmental protection issues;

8) Training and raising employee awareness on environmental responsibility and sustainability programs;

9) Insurance coverage for high environmental risks;

10) Development of a waste and hazardous substances management program;

11) International cooperation in the development and application of environmentally friendly and energy-efficient technologies, as well as support for research on the impact of energy facilities on the environment and climate change.

140. The Company identifies the following material environmental aspects within its operations: air quality and emissions, water resources, waste management, biodiversity, and asset closure and site rehabilitation.

Climate transition and adaptation

141. The Company recognizes the importance of combating both causes and consequences of climate change in the regions where it operates.

142. The Company develops a climate transition plan aligned with a 1.5°C warming scenario. The plan covers Scope 1, 2 and 3 greenhouse gas emissions, the generation portfolio and each material asset, and includes interim targets, a schedule for the modernisation and phase-out of carbon-intensive capacities, underlying assumptions, dependencies and just transition considerations. An annual report is prepared to monitor progress towards achieving the targets set out in the Programme.

143. The Company regularly identifies and assesses physical and transition climate risks that may have a material impact on its operations, assets and, where material dependencies exist, its value chain. The assessment is carried out using relevant climate scenarios over short-, medium- and long-term time horizons, taking into account data availability and quality. Where a risk is identified as material, adaptation measures (engineering, nature-based and organisational) are developed, together with implementation timelines and, where necessary, financing requirements.

144. The Company conducts scenario-based assessments of the potential financial impacts of physical and transition climate risks and climate-related opportunities in accordance with the approved Methodology for Assessing the Financial Impacts of Climate Risks and Opportunities. For these purposes, up-to-date operational, financial and climate data, corporate energy transition scenarios and relevant parameters of physical climate impacts are used. The results of scenario analysis and stress testing may be taken into account when updating the Energy Transition Programme, in budgeting and financial planning, in the assessment of assets and projects, in climate risk management and in the preparation of climate-related disclosures.

145. The Company ensures the continuous enhancement of its climate-related disclosures in line with the requirements of IFRS S2, including disclosures on climate-related risks and opportunities, scenario analysis, financial impacts, targets and progress in implementing the Energy Transition Programme.

146. Greenhouse gases

In order to effectively manage greenhouse gas emissions, the Company develops a monitoring system, including the gradual expansion of the coverage of accounted greenhouse gas emissions, the inventory and verification of emissions, the establishment of interim targets for achieving carbon neutrality, and the development of appropriate measures to reduce emissions.

The Company focuses on reduction of environmental impact. The company seeks to minimize greenhouse gas emissions using clean coal technologies, renewable energy sources, etc.

147. Pollutants.

The main pollutants of the Company are nitrogen oxides, sulfur oxides, carbon monoxide, fly ash. In order to reduce the specific emission of pollutants per unit of output, the Company implements a comprehensive program of environmental measures such as (but not limited to):

1) installation of advanced electrostatic precipitators, new generation emulsifiers with a high ash removal rate;

2) installation of low-emission turbulent burners;

3) timely repair and retrofit of equipment

4) dust suppression of ash beaches;

5) reduction of volumes of storage of overburden rocks on external waste dumps;

6) blasting operations in watered wells;

7) dust suppression during excavation of coal in the faces, use of mine water for dust suppression on roads within open-pit mine

8) improvement and greening of the area where the company operates.

Water resources

148. The Company conducts regular monitoring of water bodies through accredited specialized laboratories in accordance with its Industrial Environmental Monitoring Programs, including the analysis of the chemical composition and quality of groundwater and wastewater.

149. The Company strives to reduce freshwater consumption and increase the share of recycled and reused water, reduce wastewater discharge volumes and concentrations of pollutants in wastewater and drainage water (including mine water and other incidental water flows), minimize water-related risks, and improve the quality of discharged wastewater.

150. The Company regularly reports on water resource use to a broad range of stakeholders, including the Board of Directors, the relevant governmental authority, and the public.

Waste management

151. The Company regularly monitors and measures waste generation volumes.

152. The Company seeks to prevent or minimize the generation of solid waste, including hazardous waste, implement initiatives for the reuse and recycling of solid waste, reduce its environmental impact, and ensure its environmentally sound disposal.

153. The Company regularly reports on waste management to a broad range of stakeholders, including the Board of Directors, the relevant governmental authority, and the public.

Conservation of biological diversity and sustainable management of natural resources

154. The Company shall perform the following actions for preservation of biological diversity and sustainable management of natural resources:

1) Before the start of construction, the Company develops environmental mitigation and conservation plans for locations where the environmental impact assessment (EIA) has identified the presence of protected animal, bird, or fish species.

2) The Company shall conduct environmental studies on the habitat of birds and bats (local and migratory) for all new wind power plants, in addition, shall provide for the development of activities aimed at protecting vulnerable species as part of project solutions.

3) Shall support the monitoring system after the completion of the construction of hydro and wind power plants to assess post-construction impacts and, if required, shall develop measures to limit such impact.

4) The Company shall conduct an environmental monitoring assessment at each current and future location of the HPP, to verify the biological effectiveness of wastewater treatment (the impact of sewage on water quality (temperature, dissolved oxygen, etc.), to maintain the conservation of fish populations, to support spawning, incubation, cultivation and passage of fish.

5) The Company seeks to avoid conducting activities in areas of high biodiversity value.

6) Shall maintain minimum water consumption for all new HPP construction projects and for large capacity extensions, all existing HPPs, to ensure that there is no loss of biodiversity and no negative impact on the end users of water.

7) Where necessary, the Company develops and implements Biodiversity Management Plans for priority areas in order to mitigate and manage impacts on biodiversity.

155. The Company regularly discloses information on biodiversity conservation and protection measures to a broad range of stakeholders, including the public and investors.

Site closure and rehabilitation

156. Upon cessation of operations, the Company undertakes site closure and land rehabilitation activities to minimize adverse environmental impacts.

157. Remediation and closure activities are carried out in strict compliance with the closure plan approved through the required expert reviews and prepared in accordance with the Code of the Republic of Kazakhstan "On Subsoil and Subsoil Use" and other applicable laws of the Republic of Kazakhstan.

158. A Closure Fund is established to finance facility closure, land rehabilitation, environmental monitoring, and pollution control activities.

159. The Company takes measures to eliminate or prevent significant adverse impacts on the environment and landscape.

8. Referenced codes and standards

160. This Guide was developed taking into account the requirements of the following documents:

1) Charter of the Company;
2) Long-term development strategy of the Company;
3) Corporate Governance Code of the Company;
4) Company’s Code of Conduct;
5) Proactive informing policy of “Samruk Kazyna” JSC;
6) Corporate Management System Policy of the Group of Companies;
7) Rules for management of internal regulatory documents of the Company;
8) Instruction on maintenance of safety of the official and commercial information in the Company;
9) Investment Policy of the Company;
10) Regulations for evaluating the effectiveness, preparation, formation and
11) monitoring of the implementation of the HO's investment programs;
12) The Guide for Development of Local Communities of the International Council
13) for Mining and Metals (ICMM) (http://www.icmm.com/publications/pdfs/4080.pdf);
14) International standards AA1000: SES, AS, APS;
15) Sustainability Reporting Guidelines;
16) United Nations Global Compact Principles;
17) United Nations Sustainable Development Goals (SDGs).

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9. Forms of documents and records

161. Forms indicated in the table below is an integral part of the Guide:

Таблица

No	Title of the form of a document/records	ID of a document/record	Information about person in charge	Place of storage of a	Period of storage of a

				document/ record	**document / record**
1	The questionnaire	FR 01 SE-R-01/03	BU employees	CGandSDD	Permanently

Annex
FR 01 SE-R-01/03

The questionnaire

Full name: (voluntary information) _____

Company: (voluntary information. If you are an employee of a company, association, you may write “an individual”) _____

Please grade the following aspects according to five-point grading scale
(1 – not important, 5- very important)

Material topics	Degree of importance				
	1	2	3	4	5