



Stakeholder Engagement Plan

Alatau Zharyk Grid
Reinforcement Project

Grid infrastructure
modernization programme in
Almaty and Almaty Region of
Kazakhstan

July 2026

Public

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Document Details

Title	Stakeholder Engagement Plan
Project	Alatau Zharyk Grid Reinforcement Project Grid infrastructure modernization programme in Almaty and Almaty Region of Kazakhstan
Date	July 2026
Revision	1.0

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ACRONYMS AND ABBREVIATIONS

CLO	Community Liaison Officer
CO ₂	Carbon Dioxide
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
kV	Kilovolt
LLP	Limited Liability Partnership
MW	Megawatt
NGOs	Non-Governmental Organization
NTS	Non-Technical Summary
OHL	Overhead Line
OHS	Occupational Health and Safety
PR	Performance Requirement
PS / SS	Power Substation / Substation
RoK	Republic of Kazakhstan
RP	Distribution Point
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan

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1 INTRODUCTION

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing financing to Alatau Zharyk Company JSC (“AZhK” or the “Company”) for implementation of the Alatau Zharyk Grid Reinforcement Project (the “Project” or the “Modernisation Programme”) in Almaty city and Almaty Region, Kazakhstan. The proceeds of the financing are expected to support AZhK’s investment programme for 2026-2028, which forms part of Kazakhstan’s national grid modernisation agenda.

AZhK is owned by “Samruk-Energy” JSC («Samruk-Energy»). As part of the group, the Company follows the corporate standards and requirements established by Samruk-Energy in the field of environmental and social management.

This document is a Stakeholder Engagement Plan (hereinafter referred to as “SEP” or “the Plan”) developed to support implementation of the Project. It 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 Almaty and Almaty 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 (Table 1, Figure 1). 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 Almaty and Almaty region.

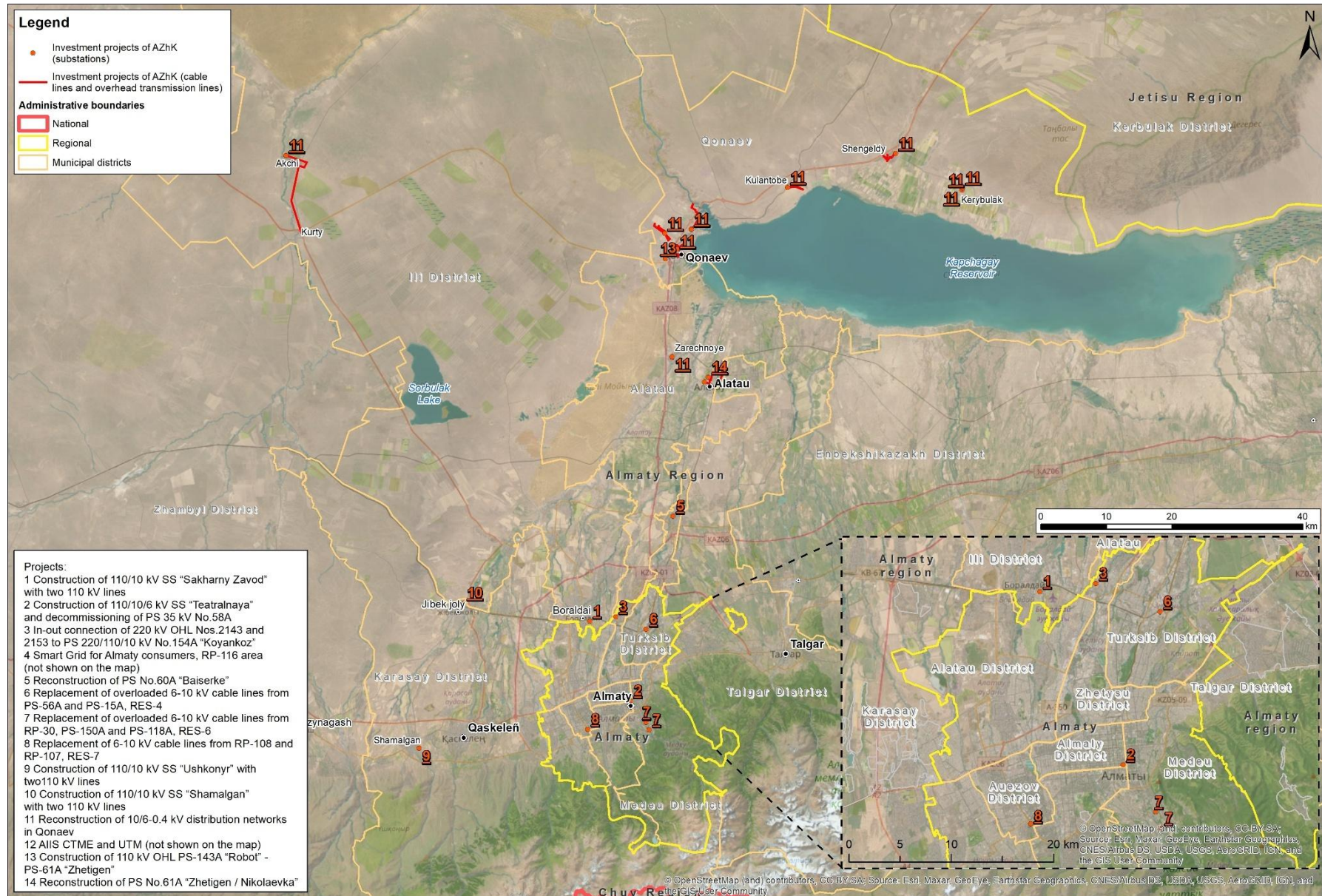
These measures will enable faster fault detection, more responsive load management, and improved integration of renewable energy at the distribution level. The Project is also expected to support climate resilience and generate significant environmental benefits by reducing technical losses, lowering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

Table 1: Project Components

Component	Timeline
Construction of 110/10 kV SS “Sakharny Zavod” with two 110 kV lines	2026 – 2028
Construction of 110/10/6 kV SS “Teatralnaya” and decommissioning of PS 35 kV No.58A	2026 – 2028
In-out connection of 220 kV OHL Nos.2143 and 2153 to PS 220/110/10 kV No.154A “Koyankoz”	2026 – 2027
Smart Grid for Almaty consumers, RP-116 area	2026 – 2027
Reconstruction of PS No.60A “Baiserke”	2026 – 2027
Reconstruction of overloaded 6-10 kV cable lines from PS-56A and PS-15A, RES-4	2026 – 2027
Reconstruction of overloaded 6-10 kV cable lines from RP-30, PS-150A and PS-118A, RES-6	2026 – 2027
Reconstruction of 6-10 kV cable lines from RP-108 and RP-107, RES-7	2026 – 2027
Construction of 110/10 kV SS “Ushkonyr” with two 110 kV lines	2026 – 2027
Construction of 110/10 kV SS “Shamalgan” with two 110 kV lines	2026 – 2028
Reconstruction of 10/6-0.4 kV distribution networks in Qonaev	2026 – 2027
AIIS CTME and UTM	2026 – 2027
Construction of 110 kV OHL PS-143A “Robot” - PS-61A “Zhetigen”	2026 – 2028
Reconstruction of PS No.61A “Zhetigen / Nikolaevka”	2026 – 2027

Currently, the Project is at an early stage; the Company will start development of project documentation and the selection of a contractor upon the approval of financing by the EBRD.

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3 NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1 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, #1). 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);
- provides for the requirements for holding public hearings (Article 73).

As the Project facilities fall under category IV of negative environmental impact, screening, scoping, impact assessment and, accordingly, public hearings are not required.

The Law of the Republic of Kazakhstan ‘On Access to Information’ dated 16 November, 2015 No. 401-V ZRK¹ defines environmental information as socially significant information, access to which may not be restricted for citizens (Article 6). Among other means of accessing information, citizens have the right to make a written request to the supervisory authorities who hold the relevant information. In accordance with the article 17 p.2 the supervisory authorities are obliged to ensure access to information to vulnerable groups (in particular persons with disabilities) by adapting the web content to make it accessible.

In addition to environmental aspects, under the legislation of the Republic of Kazakhstan, increases in electricity tariffs by natural monopolies are also subject to public hearings. Given the need to recover the costs of the new energy transmission equipment being installed, the likelihood of tariff increases is high. The Committee on Regulation of Natural Monopolies and Protection of Competition of the Ministry of National Economy of the Republic of Kazakhstan is responsible for organizing public hearings. The Committee publishes announcements on public hearings in regional mass media 30 days prior to the date of the hearings (10 days in case simplified procedure is applies).

The legislation of the RoK does not require legal entities to establish and apply project grievance redress mechanisms, not does it oblige them to inform stakeholders about Project progress and respond to information requests throughout all Project phases. However, as a natural monopoly, AZhK together with the Committee must provide its consumers with monthly in-personal reception.

3.2 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

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

social risk management in private sector developments. The EBRD's environmental and social policy² 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, stakeholders are identified and documented. Stakeholders are defined individuals or groups who are affected by the Project's activities and operations, or individuals and groups who may have an interest in the Project. The Company is also required to identify vulnerable individuals or groups, as they might need additional measures or support to participate in engagement.
- **Information disclosure.** If a Project has significant environmental or social impacts throughout its life cycle, the Company should disclose relevant information about the Project to stakeholders as it becomes available.
- **Stakeholder engagement planning.** Projects which may lead to adverse environmental or social risks and impacts should be developed in cooperation with affected communities. Engagement with affected communities includes disclosure of information on Projects risks and impacts, meaningful consultations, and providing feedback to stakeholders on their concerns and expectations. The Company is required to prepare a *Stakeholder Engagement Plan (SEP)*, which sets out engagement approaches and formats, and to disclose and discuss SEP with stakeholders. Following these discussions, the Plan should be implemented and regularly updated, taking into account stakeholder feedback and/or any changes to the Project.
- **Conducting meaningful consultations.** The Company must consult with stakeholders throughout the entire Project lifecycle in a meaningful manner. The consultation process is based on the prior disclosure and dissemination of information about the Project's environmental and social impacts and is documented by the Company. During consultations, the Company takes into account stakeholders' views and concerns, on the basis of which mitigation measures are developed.
- **Receiving and facilitating complaints through a grievance mechanism.** The grievance mechanism (GRM) should ensure that issues are considered objectively, in a culturally appropriate manner, and without the use of repressive measures. The GRM should be accessible to all stakeholder groups, including vulnerable individuals and groups, and should allow for the submission of anonymous complaints.
- **External communication procedure.** A procedure for external communications should be proportionate to the risks and potentially adverse impacts of the Project and should include methods for receiving and responding to external communications from Project stakeholders.
- **Monitoring the effectiveness of the engagement process.** The engagement process should be carried out throughout the entire life cycle of the Project; ensure confidentiality for stakeholders where necessary, and be free from any repressive actions against stakeholders. During Project implementation, the Company is required to monitor the effectiveness of the engagement process and the grievance mechanism.

² 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>

4 STAKEHOLDER IDENTIFICATION AND CURRENT ENGAGEMENT

4.1 Stakeholder Identification and Analysis

The purpose of stakeholder identification is to ensure inclusive and meaningful engagement with different categories of stakeholders. Stakeholder identification is an ongoing process, and stakeholders will therefore continue to be identified at different stages of the Project.

A systematic approach is used to map the stakeholders based on the significance of potential Project impacts. Preliminary stakeholder identification was carried out at the initial stage of the Project (May 2026) by means of:

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

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 EBRD requirements. Further updates and revisions of this SEP will be undertaken by AZhK as the Project develops.

Based on this analysis, a Draft Register of Stakeholders was compiled; and the preliminarily identified stakeholder groups are presented in the table below (Table 2). This register includes a detailed list of stakeholders, outlines their potential expectations and concerns and provides other relevant information for effective stakeholder engagement and dialogue throughout the Project lifecycle. There are two categories of stakeholders identified in this SEP:

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

Data on stakeholders collected at the early stage of the Project enabled the Company to gain an understanding of those who are interested in and/or concerned about the Project and, consequently, should be involved in engagement activities.

The Company will continuously identify Project stakeholders throughout the Project life cycle and adjust engagement methods as the Project progresses and as the needs and interests of stakeholders change over time, if necessary.

Table 2: Key Stakeholder Groups

Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests / Rationale for Engagement
Internal AzhK stakeholders	Company management	Primary	<ul style="list-style-type: none"> Internal communication and engagement 	<ul style="list-style-type: none"> Participation in decision-making process Conditions and impacts of Project implementation Opportunities for information, consultation and feedback
Local communities – residents of settlements in the Project implementation area	<ul style="list-style-type: none"> Almaty: Medeu district, Auezovsky district, Turksib district, Zhetysu district Karasai district, Shamalghan, Zhibek Zholy Ili district: Boraldai, Akshi, Kurty Konaev, incl. Shengeldy, Kerybulak, Sarybulakr, Kulantobe Alatau, incl. Zarechnoye, Zhetygen 	Primary	<ul style="list-style-type: none"> Consultations and notifications on the timing of construction works Publications in the media and social media (official Company accounts) Information on the Company's website Handling requests and grievances Information posters and warning signs at AZhK facilities Direct communications with residents of buildings located near construction sites 	<ul style="list-style-type: none"> Information about expected impacts and positive effects Information on the commencement of construction works and related shutdowns Information about tariff changes Access to and use of the grievance redress mechanism
Electricity consumers – legal entities	Electricity consumers in the Project area, including: <ul style="list-style-type: none"> Production facilities, Other legal entities 	Primary	<ul style="list-style-type: none"> Information on the Company's website and in the media Direct communication and notifications on planned service disruption and back-up solutions 	<ul style="list-style-type: none"> Information about expected impacts and positive effects Information on the commencement and duration of construction works and related shutdowns Information about tariff changes
Electricity consumers – state bodies and institutions	Social infrastructure facilities and other state institutions connected to AzhK's power grids	Primary	<ul style="list-style-type: none"> Information on the Company's website and in the media 	<ul style="list-style-type: none"> Timely information on commencement and duration of construction works and related shutdowns

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests / Rationale for Engagement
			<ul style="list-style-type: none"> ■ Direct communication and notifications on planned service disruption and back-up solutions 	
Land users located near the Project assets	Owners / users of private residential land plot located in the protection zones of the Project facilities	Primary	<ul style="list-style-type: none"> ■ Direct communication ■ Publications in the media ■ Information on the Company's website ■ Handling requests and grievances ■ Warning signs at AZhK facilities 	<ul style="list-style-type: none"> ■ Ensuring safe and informed access to Project facilities by AZhK and/or its contractors ■ Information on land use restrictions within protection zones ■ Information about expected impacts and positive effects ■ Information on commencement and duration of construction works and related shutdowns ■ Information about tariff changes ■ Access to and use of the grievance redress mechanism
	Owners of agricultural land within which the Project facilities are located	Primary	<ul style="list-style-type: none"> ■ Direct communication ■ Information on the Company's website ■ Handling requests and grievances ■ Warning signs at AZhK facilities 	<ul style="list-style-type: none"> ■ Ensuring safe and informed access to Project facilities by AZhK and/or its contractors ■ Information on land use restrictions within protection zone ■ Information about expected impacts and positive effects ■ Information on commencement and duration of construction works and related shutdowns ■ Access to and use of the grievance redress mechanism
Public authorities and regulators	National, regional and local authorities	Secondary	<ul style="list-style-type: none"> ■ Official reports, letters, phone or email ■ Meetings with authority representatives 	<ul style="list-style-type: none"> ■ Compliance of Project activities with regulatory requirements ■ Ensuring economic growth

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests / Rationale for Engagement
				<ul style="list-style-type: none"> ■ Reliable energy supply and availability of reserves for further development ■ Ensuring public safety ■ Projects aimed at improving quality of life for residents
Vulnerable groups	<ul style="list-style-type: none"> ■ Vulnerable in case of tariff increases: <ul style="list-style-type: none"> ○ Low-income households, ○ Single-parent families, ○ Elderly people/ ■ People particularly vulnerable in the event of a power outage: <ul style="list-style-type: none"> ○ Persons with disabilities. 	Primary	<ul style="list-style-type: none"> ■ Consultations ■ Direct communication ■ Information on the Company's website ■ Handling requests and grievances 	<ul style="list-style-type: none"> ■ Information about tariff changes and targeted assistance³ ■ Information about expected impacts and positive effects ■ Information on the commencement and duration of construction works and related shutdowns ■ Access to and use of grievance redress mechanism
Local NGOs	<ul style="list-style-type: none"> ■ NGOs and members of the public who are interested in tariff setting issues 	Secondary	<ul style="list-style-type: none"> ■ Consultations and public hearing ■ Direct communication ■ Information on the Company's website ■ Social media (official Company account) 	<ul style="list-style-type: none"> ■ Information about tariff changes ■ Information on implementation of the investment programme
	<ul style="list-style-type: none"> ■ NGOs promoting women rights ■ NGOs supporting vulnerable groups 	Secondary	<ul style="list-style-type: none"> ■ Information on the Company's website ■ Engagement of NGOs promoting women rights as mediators upon request of GBVH complainants 	<ul style="list-style-type: none"> ■ Information about tariff changes ■ Information on how Project measures ensure gender equality and mitigate GBVH risks

³ 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 / Rationale for Engagement
Local opinion leaders and community influencers	<ul style="list-style-type: none"> Community leaders, informal group leaders and social media influencers in the Project area 	Secondary	<ul style="list-style-type: none"> Meetings and consultations Direct communication Social media engagement 	<ul style="list-style-type: none"> Access to timely and accurate information Ability to convey community concerns and feedback
AZhK personnel	<ul style="list-style-type: none"> Workers engaged in Project implementation Workers who might be dismissed as a result of modernisation and eliminating some functions 	Primary	<ul style="list-style-type: none"> Internal communication channels, including communication through line managers, the HR department, top management and the Labour Union 	<ul style="list-style-type: none"> Information on the Collective Dismissal Plan Information on the Company's performance and Project timelines Ensuring workplace safety Access to and use of the grievance redress mechanism
Contractors and supply chain	<ul style="list-style-type: none"> Suppliers and construction contractors 	Primary	<ul style="list-style-type: none"> Direct communication Procurement and tender processes 	<ul style="list-style-type: none"> Participation in Project implementation Ensuring the quality of services provided Implementation of the Project in accordance with EBRD's Environmental and Social Policy
	<ul style="list-style-type: none"> Contractors' and supply-chain workers 	Primary	<ul style="list-style-type: none"> Grievance redress Communication during site inspections and monitoring 	<ul style="list-style-type: none"> Ensuring workplace safety Ensure fair labour and working conditions Access to and the use of grievance redress mechanism
Mass media	<ul style="list-style-type: none"> Printed mass media at regional, district and municipal level Television Internet resources and social media platforms 	Secondary	<ul style="list-style-type: none"> Official press releases, letters, phone or email Press conferences Social media posts and announcements 	<ul style="list-style-type: none"> Access to information for Project progress coverage
Lending Organisation	<ul style="list-style-type: none"> EBRD 	Secondary	<ul style="list-style-type: none"> Direct communication 	<ul style="list-style-type: none"> Providing the loan to finance the Project

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Stakeholder Group	Stakeholders	Type of stakeholders	Communication Method	Stakeholders' Interests / Rationale for Engagement
			<ul style="list-style-type: none"> ■ Communication with the involvement of an independent environmental and social consultant 	<ul style="list-style-type: none"> ■ The Company's compliance with environmental, social and technical requirements in accordance with the Bank's policies

4.2 Current Stakeholder Engagement

As of June 2026, the Project was at an early stage and AZhK has not yet engaged stakeholders regarding the Project.

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

The Company regularly disclose information on its performance, implementation of investment programs, and social events and activities through local media.

The Company's website⁴ contains information about its current activities and investment programs, as well as "Media" and "Rates" sections containing information for consumers and other interested parties. The Company also regularly publishes similar information in social networks (Instagram, TikTok and Facebook).

These communications serve to keep the wider public informed about ongoing and planned activities, highlight improvements in service quality and safety, and provide transparency around the Company's role in energy sector. The Company's social media are also used to obtain feedback from stakeholders.

4.2.2 Handling requests and complaints from stakeholders

The Company has a formal complaint mechanism through an internal unit (Complainant Department) to register, process, and resolve incoming requests, complaints and inquiries from both individuals and legal entities. There are several channels, including state web-platforms (Documenotolog, E-Otinish and Open-Almaty), the AZhK website, the Samruk Energy Hotline, public reception and 2GIS feedback form. Applications and complaints are accepted, registered and reviewed within 15 calendar days. This system ensures accountability, helps identify recurring issues, and provides input into continuous service improvement. These channels can be used by any interested parties, including employees of the Company. Anonymous and confidential complaints are referred to the Ombudsman for consideration.

4.2.3 Communication with consumers regarding planned and emergency shutdowns

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

⁴ [АО «Алатау Жарык Компаниясы»](#)

4.2.4 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 when raising electricity tariffs.

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.

4.2.5 Informing stakeholders about ongoing construction works

The Company provides advance notice to residents and users of areas adjacent to work sites regarding planned construction activities, including the expected duration of works and any temporary restrictions on access to or use of the affected areas. To ensure transparency and safety, construction sites are fenced off and equipped with information boards indicating the nature of the works, implementation timelines, responsible personnel, and contact details for submitting inquiries and obtaining additional information.

Where construction activities (for example, relocation of cable lines) may temporarily restrict access to private residential properties or business premises, the Company engages with affected parties in advance to agree the timing of works and determine the necessary measures to maintain or arrange alternative access.

4.2.6 Engagement with affected land users

The Company engages directly with land users who may be affected by construction activities or maintenance works associated with existing facilities. At the planning stage, individual consultations are held with affected land users to discuss and agree on conditions for temporary land use, placement of new infrastructure, access to existing facilities and other organizational arrangements.

Prior to the commencement of construction works, AZhK, together with its contractors, prepares agreement letters with affected land users documenting the agreed conditions and duration of land use. Before mobilization and the start of works, contractors additionally inform land users about the planned schedule, including the start and completion dates of construction activities and other relevant implementation details.

5 STAKEHOLDER ENGAGEMENT AND DISCLOSURE

5.1 Disclosure Information and Placement Locations

The environmental and social package prepared in accordance with EBRD requirements 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 document package will be available on the Company's website and in hard copy at the Company's offices and offices of the following akimats:

- Almaty: Medeu district, Auezovsky district, Turksib district, Zhetysu district;
- Karasay district: Shamalgan, Zhibek Zholy;
- Ili district: Boraldai, Akshi, Kurty;
- Konaev, Shengeldy, Kerybulak, Sarybulak, Kulantobe;
- Alatau, Zarechnoye, Zhetygen.

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

5.2 Stakeholder Engagement and Information Disclosure Program

This SEP describes stakeholder engagement activities and 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 this early phase of the Project. This Action Plan is subject to amendment as required for each Project phase and will be further detailed and refined.

Table 3: Engagement Action Plan

Stakeholders	Engagement Activities	Information to be Disclosed	Timeline / Frequency
All stakeholders	<ul style="list-style-type: none"> ■ General information disclosure to inform stakeholders about disclosure of the E&S package and the proposed consultation by means of the following: <ul style="list-style-type: none"> ○ Publish an announcement on the Company's website and social media accounts; ○ Distribute information through Akimats in Project locations; ■ Publish an announcement in the mass media 	<ul style="list-style-type: none"> ■ NTS ■ SEP 	<ul style="list-style-type: none"> ■ Information disclosure: within one month of loan agreement signing
Local communities including vulnerable groups	<ul style="list-style-type: none"> ■ Arrange consultation meetings on disclosed information with local communities, including groups of people residing near construction sites 	<ul style="list-style-type: none"> ■ NTS ■ SEP ■ Project schedule ■ Information on tariff increase ■ Minutes of meetings 	<ul style="list-style-type: none"> ■ Before the start of construction works, when detail Project design will become available
	<ul style="list-style-type: none"> ■ Inform local communities about planned power outages through local akimats, information on the Company's website, and announcements in the mass media 	<ul style="list-style-type: none"> ■ Project schedule ■ Schedule of power outages 	<ul style="list-style-type: none"> ■ No later than 3 days before the shutdown⁵

⁵ <https://adilet.zan.kz/rus/docs/V1500010403>

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Stakeholders	Engagement Activities	Information to be Disclosed	Timeline / Frequency
	<ul style="list-style-type: none"> Inform stakeholders about the GRM procedure for external stakeholders on the Company web-site, on posters describing activities on construction sites 	<ul style="list-style-type: none"> GRM procedure 	<ul style="list-style-type: none"> Inform about the GRM procedure on web-site: within one month of loan agreement signing and then semi-annually
	<ul style="list-style-type: none"> Hold meetings with residents and small businesses located near construction sites to provide information on GRM, construction timelines and agree on access arrangements 	<ul style="list-style-type: none"> Project schedule Schedule of power outages Information on access restrictions to the construction site 	<ul style="list-style-type: none"> Prior to start of construction works
Electricity consumers – businesses	<ul style="list-style-type: none"> Agree timeline of power outages through direct communication Inform on tariff increase 	<ul style="list-style-type: none"> Project schedule Schedule of power outages Tariff increases 	<ul style="list-style-type: none"> Inform consumers in advance to power outage according to terms of electricity supply agreements
Electricity consumers – state bodies and institutions			
Land users located near the Project assets	<ul style="list-style-type: none"> Arrange meetings with land users located in the protected zones of the Project facilities. Explain safety and maintenance requirements and land user restrictions 	<ul style="list-style-type: none"> Meeting's agendas and actions to be agreed and undertaken by land users in case AZhK facility is located within their land plot Information on safety and maintenance requirements and land user restrictions 	<ul style="list-style-type: none"> Prior to commencement of construction works
	<ul style="list-style-type: none"> Inform about the GRM procedure for external stakeholders on the Company web-site 	<ul style="list-style-type: none"> GRM procedure 	<ul style="list-style-type: none"> Within one month of loan agreement signing and then semi-annually

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Stakeholders	Engagement Activities	Information to be Disclosed	Timeline / Frequency
Public authorities and regulators	<ul style="list-style-type: none"> ■ Interaction with local authorities, including: <ul style="list-style-type: none"> ○ Obtaining approvals and permissions, ○ Informing authorities about Project changes 	<ul style="list-style-type: none"> ■ Information on compliance with national legislation 	<ul style="list-style-type: none"> ■ In accordance with the construction and operation timelines (as required by applicable permitting procedure)
Local NGO	<ul style="list-style-type: none"> ■ Disclose Project-related information on the Company's website ■ Hold meetings with key stakeholders on tariff changes 	<ul style="list-style-type: none"> ■ Tariff increases ■ GRM procedure 	<ul style="list-style-type: none"> ■ Consultations to be arranged prior to tariff increase
	<ul style="list-style-type: none"> ■ Engage with NGOs promoting women's rights in case GBVH grievances require mediation by a third party 	<ul style="list-style-type: none"> ■ GRM procedure 	<ul style="list-style-type: none"> ■ Mediation support: as required, upon request of GBVH complainants
AZhK personnel	<ul style="list-style-type: none"> ■ Inform about the GRM procedure for internal stakeholders. ■ Arrange consultations with AZhK workers as part of Collective Dismissals Plan implementation and inform workers about the availability of training programs 	<ul style="list-style-type: none"> ■ Minutes of the meetings ■ GRM procedure 	<ul style="list-style-type: none"> ■ Inform about GRM: within one month of loan agreement and then quarterly ■ Consultations arranged before collective dismissals
Contractors' personnel	<ul style="list-style-type: none"> ■ Inform contractors' workers about the GRM procedure 	<ul style="list-style-type: none"> ■ GRM procedure 	<ul style="list-style-type: none"> ■ Within one month of loan agreement and then monthly
Contractors and supply chain	<ul style="list-style-type: none"> ■ Inform about procurements and tenders on the Company's website 	<ul style="list-style-type: none"> ■ Procurement procedure ■ Tender procedure 	<ul style="list-style-type: none"> ■ In accordance with procurement and tender procedures and schedule

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Stakeholders	Engagement Activities	Information to be Disclosed	Timeline / Frequency
		<ul style="list-style-type: none"> ■ Schedule of procurements and tenders on the Proejct 	
Lending Organisation	Inform about the Project progress and E&S performance	<ul style="list-style-type: none"> ■ Report on Project compliance with EBRD environmental and social policies 	<ul style="list-style-type: none"> ■ Reporting: annually

6 GRIEVANCE REDRESS MECHANISM

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

The Project GRM will comply with the following key principles in line with EBRD requirements:

- Assigning a responsible person (GRM manager), team or function to organize the resolution of grievances,
- Defining timeframes for acknowledgement of the receipt of complaints and their subsequent resolution,
- Establishing practical arrangements for maintaining confidentiality, and for reviewing and resolving grievances, including the necessary resources and organisational arrangements,
- Ensuring that information on the grievance mechanism is readily retrievable from the Company's website, from locations where Project information in hard copy is available, and/or from Company representatives⁶.

In accordance with international good practices, the AZhK 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 (GBVH).

The Grievance mechanism described in this section is designed to handle all types of complaints, including those related to GBVH, and allows complaints to be filed anonymously.

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

All complaints related to gender-based violence will be handled in a strict confidence. The identity of complainants will always be protected, and no retaliatory measures of any kind will be tolerated. Where necessary, GBVH cases will be referred to qualified specialists, including lawyers, psychosocial workers and child protection specialists. Such cases will only be handled by trained investigators, and serious incidents can be referred to the relevant national authorities or external mediators 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** at the Public Reception (Company offices) and during meetings with Company representatives – the Social Manager and Local Community Liaison Officers - who will ensure that all complaints raised by residents during consultations are documented and investigated. The Social Manager and Local Community Liaison Officers will be able to address grievances related to any adverse Project impacts, including health and safety, GBVH and nuisance due to construction works, etc.;
- **By submitting a request to:**

⁶ Grievance management, guidance note, EBRD, 2012

- State web-platforms E-Otinish⁷ and Open Almaty⁸;
 - AZhK Ombudsman by telephone +7 (701) 788-82-07;
 - Samruk Energy Hotline⁹ and Ombudsman (ombudsman@samruk-energy.kz);
 - AZhK website¹⁰, phone +7 (727) 356-99-99 and email: info@azhk.kz.
- **Via partner institutions or trusted intermediaries**, such as local community leaders, akimats or local NGOs promoting women's rights.

Anonymous and confidential complaints are handled by AZhK; the complainant will be consulted to determine an appropriate channel for communicating the results of grievance investigation.

To assist complainants and structure the information provided, Appendix 1 contains a feedback form that can be used to submit a complaint.

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 grievance handling

The GRM Manager (Head of Chancellery) will ensure that all complaints and appeals received through all channels are recorded in the Grievance register, as provided in Appendix 2.

The GRM Manager will ensure that all applicants receive written confirmation of grievance receipt. A notification will be sent to the applicant within 3 days of receipt, indicating the appeal identification number and the timeframe for preparing a response, in order to reassure applicants that the organization is responding appropriately.

If complaints relate to accidents, unsafe conditions or other issues concerning the safety of the local population, confirmation will be provided on the same day the complaint is received and the complaint will be immediately forwarded to the responsible persons.

The scheme of the GRM process is presented below in the Figure 2.

⁷ [eOtinish](#)

⁸ [Open Almaty](#)

⁹ [Hot Line](#)

¹⁰ [Feedback](#)

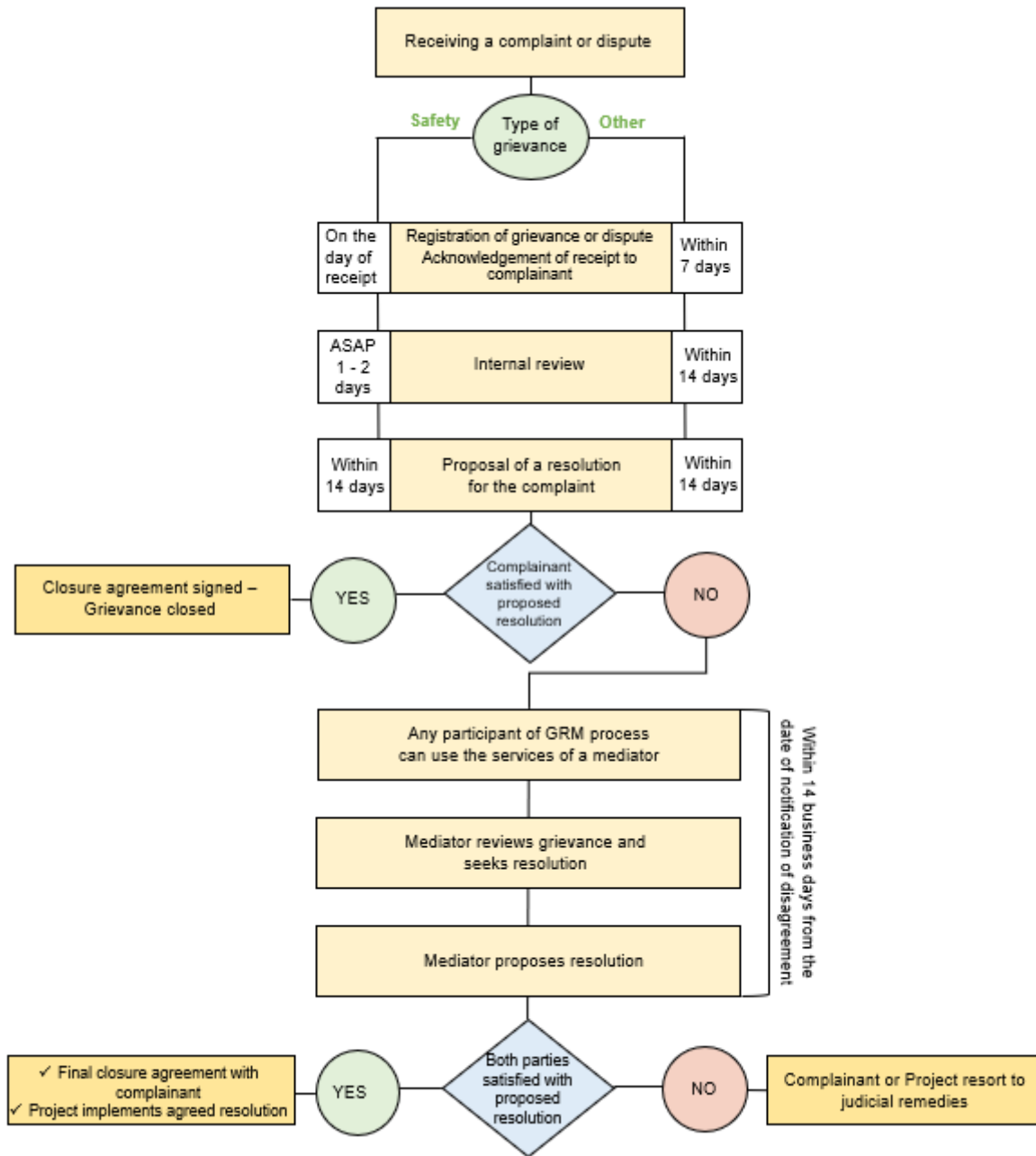


Figure 2: GRM Process Scheme

Investigation

Complaints and appeals received by the AZhK are forwarded to the responsible department for consideration. In cases where sensitive grievances have been raised (for example, in relation to GBVH risks), the Social Manager together with the Ombudsman are 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 15 calendar days of submission. If more time is required to consider a grievance, the applicant will be informed of this and the expected response time. Requests that involve circumstances which may trigger accidents or safety issues will 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; in all cases the Company will keep a written entry in the Grievance Register.

Responses to anonymous complaints will be communicated to complainant through the agreed means of communication, or where appropriate will be posted on 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 confirming agreement with the proposed solution.

If the complaint remains unresolved and additional time is needed for further investigation, a letter will be 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 a mediator may be held until resolution is reached. If the complainant is still not satisfied, they may seek external dispute resolution, including judicial options.

Closing the grievance

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

7 PLAN IMPLEMENTATION, MONITORING AND REPORTING

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

7.1 Roles and Responsibilities

The Company has overall responsibility for the implementation of the Project and for compliance with applicable environmental and social safeguards. A Social Manager / Community Liaison Officer (CLO) will be appointed as the person responsible for SEP implementation and for managing community engagement activities, including information disclosure, stakeholder engagement and grievance management. A GRM Manager (Head of Chancellery) will also be appointed to ensure the effectiveness of the grievance redress process.

The designated contacts listed below will be responsible for ensuring that all Project-related grievances are addressed in accordance with the national legislation and the EBRD's Environmental and Social Policy (Table 4) at the early stage of the Project. At subsequent stages, the list of specialists will be expanded to include staff responsible for Project engagement activities in all locations.

Table 4: Contact Details

Name of CLO	Address	Phone	Email
Kundygai Kabylkayeva Public Relations Manager (Press Secretary)	6 Rozymbakieva St., Almaty	+7 (727) 376-19-46	kkabylkayeva@azhk.kz
Azhar Kapshakbayeva GRM Manager (Head of the Chancellery)		+7 (727) 356-99-99 (Contact-center) +7 (727) 376-18-52 (Chancellery)	info@azhk.kz
Almakhat Almeshov AZhK Ombudsman		+7 (701) 788-82-07	
Public relations specialists The full names of the specialists will be clarified as the Project progresses.	<i>The addresses will be specified as the Project develops; preliminary list of settlements includes:</i> <ul style="list-style-type: none"> ■ Shamalgan, ■ Zhibek Zholy c, ■ Boralday, ■ Akshi, ■ Kurty, ■ Konaev, ■ Shengeldy, ■ Kerybulak, ■ Alatau. 	<i>The contact details of the specialists will be specified as the Project progresses</i>	<i>The contact details of specialists will be clarified as the Project progresses.</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. ■ Ensures that adequate resources (human, financial, and technical) are allocated for SEP implementation. ■ Oversees effective implementation of the SEP and the grievance mechanism. ■ Periodically reviews the effectiveness of stakeholder engagement and the grievance mechanism. ■ Ensures management of labour and working conditions, gender equality, human rights, and community health and safety in line with Lender standards. ■ Supervises contractors and implements 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.
Social Manager	<ul style="list-style-type: none"> ■ Conducts community consultations and ongoing stakeholder engagement in accordance with this SEP. ■ Ensures that timely updates are posted on the Project website. ■ Monitors and reports on GBVH risks. ■ Provides ongoing support to survivors, witnesses and/or whistle-blowers as needed.
GRM manager	<ul style="list-style-type: none"> ■ Ensures timely and transparent investigation of grievances. ■ Monitors and reports on the performance of engagement activities and grievance resolution. ■ Monitors and reports on GBVH risks. ■ Serves as a focal point for women and survivors of gender-based violence and harassment (GBVH). ■ Implements a survivor-centred and confidential grievance process. ■ Provides ongoing support to survivors, witnesses and/or whistleblowers, as needed.
Ombudsman	<ul style="list-style-type: none"> ■ Reviews and investigates anonymous and confidential complaints. ■ Ensures that applicants' confidentiality is respected. ■ Develops and delivers GBVH awareness and training materials for all workers. ■ Monitors and reports on GBVH risks. ■ Provides ongoing support to survivors, witnesses and/or whistleblowers, as needed.

7.2 Monitoring & Reporting

Statistical reports on complaints and appeals will be prepared on a regular basis using the following indicators:

- Number of registered complaints/appeals registered during the reporting period,
- Number of complaints/appeals closed during the reporting period,
- Number of outstanding complaints/appeals and comparison with the same indicator for the previous period,
- Number of complaints/appeals by type (topic),
- The number of repeated complaints/appeals on the same type (topic) or from the same stakeholder.

The Company will **report annually** on the implementation of this SEP on the AZhK website, including information on SEP update, implementation of engagement activities, stakeholders involved and agreements and results achieved.

7.3 SEP Review and Amendment

The Stakeholder Engagement Plan is a live document that will be used throughout the Project lifecycle. It will be updated as needed to reflect relevant changes, such as modifications in Project conditions, new requirements, the identification of new stakeholders, revisions to engagement methods and activities, changes in responsible staff and adjustments to the GRM process.

As a result of an independent reviews or discussions with stakeholders, there may be necessary to revise both the SEP and the GRM. The SEP will be reviewed annually with a view to continuous improvement.

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APPENDIXES

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2. Appendix 2. Example of the Grievance Register

<i>Date of Complaint Receipt</i>	<i>Applicant's Name</i>	<i>Applicant's Contact Information</i>	<i>Grievance Channel</i>	<i>Grievance Category</i>	<i>Description of Grievance</i>	<i>Person Responsible for Resolution</i>	<i>Proposed Solution</i>	<i>Date of Communication of Solution</i>	<i>Status</i>