



Almaty CHP-2 Energy Transition and Modernization Project Republic of Kazakhstan

Stakeholder
Engagement Plan



November 2024



山东电力建设第一工程公司
SEPCO1 ELECTRIC POWER CONSTRUCTION CORPORATION

DOCUMENT INFORMATION

PROJECT NAME	Almaty CHP-2 Energy Transition and Modernisation Project
5Cs PROJECT NUMBER	2305/005
DOCUMENT TITLE	Stakeholder Engagement Plan (SEP)
CLIENT	SEPCO I (Powerchina)
5Cs PROJECT MANAGER	Umida Rozumbetova
5Cs PROJECT DIRECTOR	Ken Wade

DOCUMENT CONTROL

VERSION	DATE	DESCRIPTION	AUTHOR	REVIEWER	APPROVER
1.0	28/11/2024	SEP	UR	MKB/EMO	MKB



1	Financial Capital	Regardless of location, mode of delivery or function, all organisations are dependent on
2	Social Capital	<i>The 5 Capitals of Sustainable Development</i> to enable long term delivery of its products or services.
3	Natural Capital	Sustainability is at the heart of everything that
4	Manufactured Capital	5 Capitals achieves. Wherever we work, we strive to provide our clients with the means to maintain and enhance these stocks of capital assets.
5	Human Capital	

DISCLAIMER

5 Capitals cannot accept responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from the party which commissioned it.

This document is issued for the party which commissioned it and for specific purposes connected with the above-identified project only. It should not be relied upon by any other party or used for any other purpose.

CONTENTS

1	INTRODUCTION	1
1.1	The Project	1
1.2	Context for Stakeholder Engagement	1
1.3	Scope of the SEP	2
1.4	Objectives of the SEP	2
2	PROJECT OVERVIEW	4
2.1	Project Location	4
2.2	Land Use	6
2.3	Nearby Receptors & Sensitivities	9
2.4	Project Facilities & Technology	15
2.4.1	Design Overview	15
2.4.2	Main Project Characteristics	17
2.4.3	Fuel Supply	17
2.4.4	Water Supply	18
2.4.5	Wastewater Treatment	18
2.4.6	Cooling System	19
2.5	Project Construction	19
2.5.1	Construction Phasing and Schedule	19
3	LEGAL AND COMPLIANCE OBLIGATIONS	20
3.1	National Laws and Regulations	20
3.2	Lenders E&S Requirements	21
3.2.1	European Bank for Reconstruction and Development (EBRD)	21
3.2.2	ADB	22
4	STAKEHOLDER IDENTIFICATION AND ANALYSIS	26
4.1	Approach to Stakeholder Identification	26
4.1.1	Stakeholder Engagement Matrix	27
5	STAKEHOLDER ENGAGEMENT PROGRAMME	29
5.1	Past Project Stakeholder Engagement	29
5.1.1	Public Hearings for National EIA	29
5.2	Stakeholder Engagement During the ESIA Addendum (2023-2024)	30

5.3	ESIA Addendum Public Disclosure	35
5.4	Online disclosure	39
5.5	Stakeholder Engagement Programme During Construction and Commissioning	39
5.6	Stakeholder Engagement During Operation	41
5.7	Measures to Avoid Reprisal	44
6	GRIEVANCE MECHANISM	45
6.1	Key Principles of the Grievance Mechanism	45
6.2	Scope of the Grievance Mechanism	46
6.3	Steps in Managing the Grievance Mechanism	46
6.3.1	Publicising the Grievance Management	46
6.3.2	Submitting a Grievance	47
6.3.3	Keeping Track of Grievances	48
6.3.4	Reviewing and Investigating Grievances	48
6.3.5	Grievance Resolution Options and Response	49
6.4	Grievance Mechanism during Construction and Commissioning Phase	50
6.5	Grievance Mechanism during Operational Phase	51
6.5.1	Reporting of Gender Based Violence and Harassment (GBVH)	52
6.6	Grievance Mechanism Contact Details	53
6.7	Process Flow and Timeline	53
7	IMPLEMENTATION PLAN	55
7.1	Roles and Responsibilities	55
7.1.1	Community Liaison Lead (Project Owner)	55
7.1.2	HSE Manager (EPC Contractor)	55
7.1.3	Environmental and Social Manager (EPC Contractor)	56
7.2	Monitoring and Reporting	56
7.2.1	Key Performance Indicators (KPIs)	56
7.2.2	Monitoring Parameters	56
8	REVIEW	58
	APPENDIX A – SEP PREPARED FOR THE PROJECT IN 2022	59
	APPENDIX B- EXAMPLE OF GRIEVANCE FORM	60

APPENDIX C - GRIEVANCE REGISTER TEMPLATE	61
APPENDIX D- PROJECT LEAFLET	62
APPENDIX E- PROJECT PRESENTATION	63

LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
ADB	Asian Development Bank
AoI	Area of Influence
CCGT	Combined Cycle Gas Turbine
CHP	Combined Heat & Power
CLOs	Community Liaison Officers
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement & Construction
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
FGD	Focus Group Discussions
GBVH	Gender based violence and harassment
GRM	Grievance redress mechanism
JSC	Joint-Stock Company
KIIs	Key Informant Interviews
NGOs	Non-Governmental Organizations
O&M	Operation and Maintenance
PR	Performance Requirement
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SPS	Safeguard Policy Statement

1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the Almaty CHP-2 Energy transition and Modernisation project (hereby referred to as 'the Project'), located in Almaty, Republic of Kazakhstan.

This SEP outlines the plan and framework methodology to enable the relevant project teams to undertake meaningful stakeholder engagement throughout the lifecycle of the Project.

SEPCO1 (the Project's EPC Contractor) has engaged 5 Capitals Environmental & Management Consulting (5 Capitals) to prepare this SEP.

1.1 The Project

The Project is the modernisation and reconstruction of an existing coal-fired combined heat and power plant (CHP-2) in Almaty, Kazakhstan, one of the three CHPs that generate power and provide heat to the district heating network of the city which is owned and operated by Samruk Energy.

The proposed project will gradually replace the existing coal fired plant with a new combined cycle gas turbine (CCGT) which will be a Combined Heat and Power (CHP) plant with installed capacity up to 600 MW and 957 GCal/h for heating purposes. The new plant will be constructed on land within the boundary of the existing CHP-2 plant with all grid and heating pipeline infrastructure already in place. The planned works for the modernisation of the existing plant is hereby referred to as "the Project" in this report.

The off taker for the produced electricity and heat from the modernised plant (also referred to as "the Plant") in this report will be JSC Alatau Zharyk Company and Almaty Heat Networks respectively. The transmission of electricity will be the responsibility of JSC Kegoc LLP.

1.2 Context for Stakeholder Engagement

The commitment towards ensuring environmental and socio-economic sustainability of development projects is enshrined in numerous international conventions and DFI performance benchmarks addressing topical developmental issues, such as pollution control, climate change, preservation of cultural heritage, protection of human rights, public participation in decision-making and access to information.

This commitment is also founded on the principles of transparency, accountability and good governance, which underpin the mandates of the DFIs in relation to their partners, clients and stakeholders (including project-affected communities).

As set out in the broad-based international accords and industry guidelines, stakeholder engagement is a fundamental element of sustainable and socially responsible development planning and implementation. In the context of E&S risk identification, assessment, responsive mitigation planning and related monitoring, stakeholder consultation and participatory planning is aimed at leveraging expert and local knowledge and minimizing the E&S risks of projects. The disclosure of project information at all stages of project development also delivers on stakeholders' rights to information access in development planning, and alongside meaningful and consultative dialogue, builds stakeholder buy-in for specific investments.

The inclusion of stakeholders in project development is therefore crucial to minimizing E&S risks, creating sustainable and equitable project benefits for potential beneficiaries, and addressing legal, financial and reputational risks associated with failure to meet relevant project development objectives, host country regulatory requirements and DFI mandates. As such, the Project's E&S appraisal and related stakeholder engagement processes are inextricably linked processes that should be undertaken in parallel.

This Stakeholder Engagement Plan (SEP) provides an overview of previous stakeholder engagement undertaken as part of the ESIA package prepared for the Project in 2022 as well activities carried out as part of the ESIA addendum scope (2023-2024). The SEP will serve to guide engagement with relevant stakeholders over the lifespan of the Project (i.e., project planning, construction, and operational phases).

1.3 Scope of the SEP

The SEP has been prepared in accordance with the contractual agreement between SEPCO1 (the EPC Contractor for KAZ ALES) and 5 Capitals, based on 5 Capitals' proposal also reviewed and accepted by ADB following an issued request for proposal.

The SEP set has been developed with the aim of guiding various stakeholder engagement activities for the Project, in line with regulatory requirements and relevant E&S standards observed by the Project's lenders, notably the EBRD Performance Requirements (EBRD PRs) and the ADB Safeguard Policy Statement (ADB SPS).

1.4 Objectives of the SEP

The SEP specifically aims to define the necessary engagement during the construction and operational phases, including the involved stakeholders, the frequency of engagements, and the communication protocols. It also includes a comprehensive grievance mechanism for third parties during the ESIA Addendum stage, construction, and operations.

Further, as detailed in Section 5 of this SEP, the activities in the purview of the SEP include the following:

- Various modes of consultation (i.e., formal consultative correspondence, focus group discussion, key informant interviews etc.).
- Various modes of disclosure (i.e., community meetings, written notices and disclosure of E&S safeguard documents).
- Management of external grievances (i.e., collection of project related grievances on various E&S topics, including human rights, and responsive action).

Additionally, the report outlines a grievance mechanism for internal parties (workers), which is to be developed in consultation with the client and detailed in the SEP with relevant template attachments such as grievance forms and a register for tracking grievances.

Considering the foreseeable evolution of the Project activities at different stages of implementation, potential changes in the Project's legal framework and various socioeconomic dynamics, the SEP Addendum will be a live document. The Plan will be adapted to changing conditions and outcomes of the Project's detailed ESIA Addendum, subsequent E&S monitoring and any follow-up E&S impact assessment processes, in conformity with national regulations and compliance obligations set by the Project Lenders. Upon the completion of the ESIA Addendum, the current report will integrate into the Project's broader Environmental and Social Management System (ESMS) and updated accordingly.

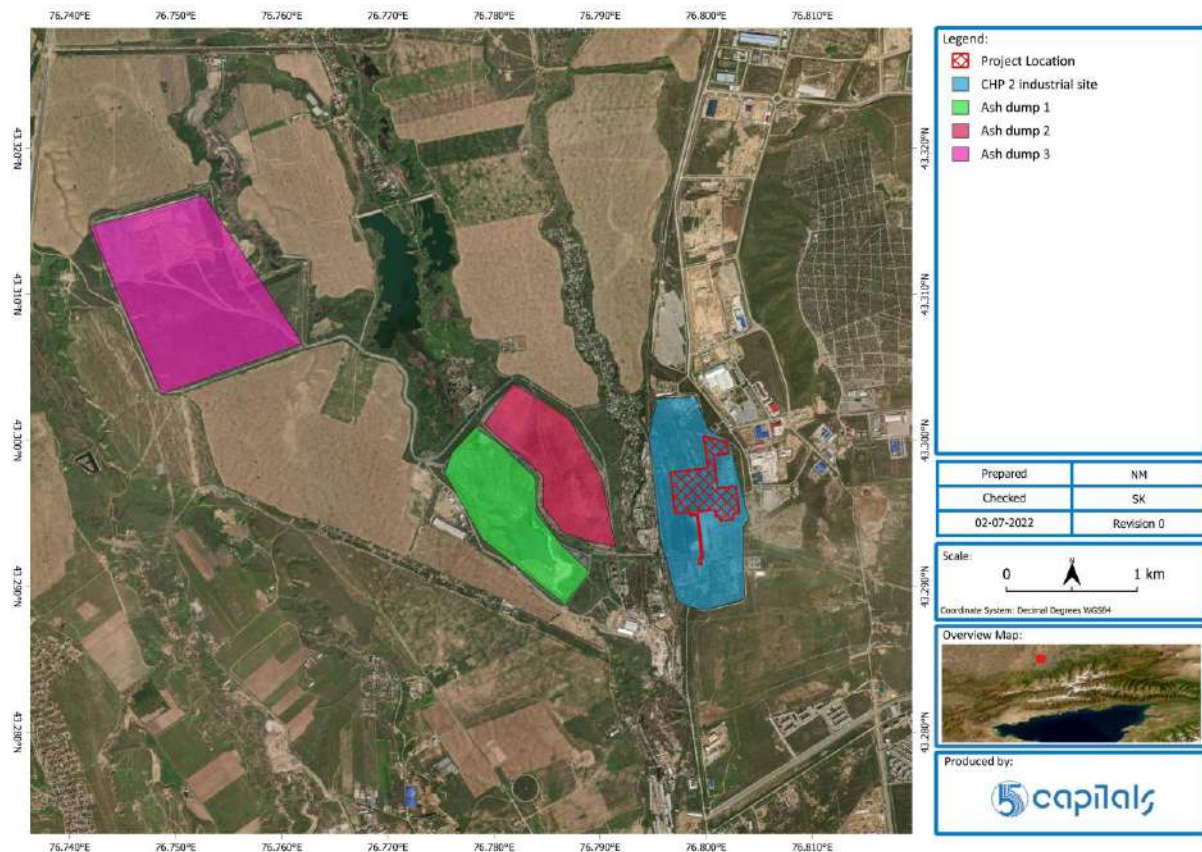
2 PROJECT OVERVIEW

Note: A brief overview of the Project is included herein for contextual purposes of this SEP only.

2.1 Project Location

The existing CHP-2 plant is located on the north-western outskirts of Almaty city, in the Alatau district (refer to following figure). The Project will be located within the boundaries of the existing plant, with the main power and heat block in an area immediately to the north of the existing coal plants power block as indicated in following figure.

Figure 2-1 Project Location



The existing Almaty CHP-2 consists of 2 primary facility areas: industrial and auxiliary. The auxiliary site includes the three (3) ash ponds, where the captured ash from the coal combustion ash removal (slugging) system is being deposited. As a gas fired plant, the proposed Project will not generate ash waste and hence will not utilise these facilities.

For reference and context only, selected photographs from the visited areas of the existing CHP-2 plant are presented below.

Figure 2-2 CHP-2 Overview (Industrial Facilities)

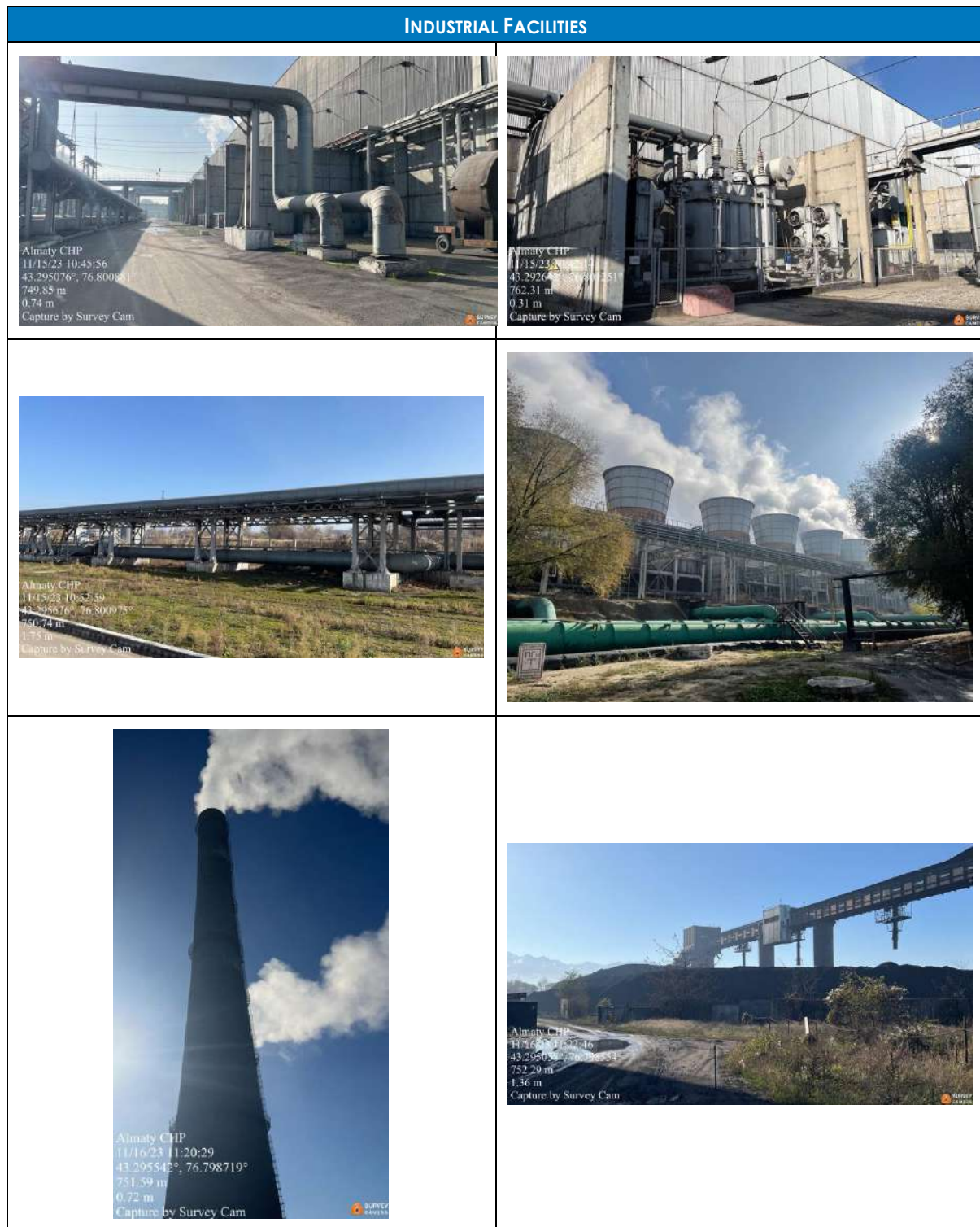
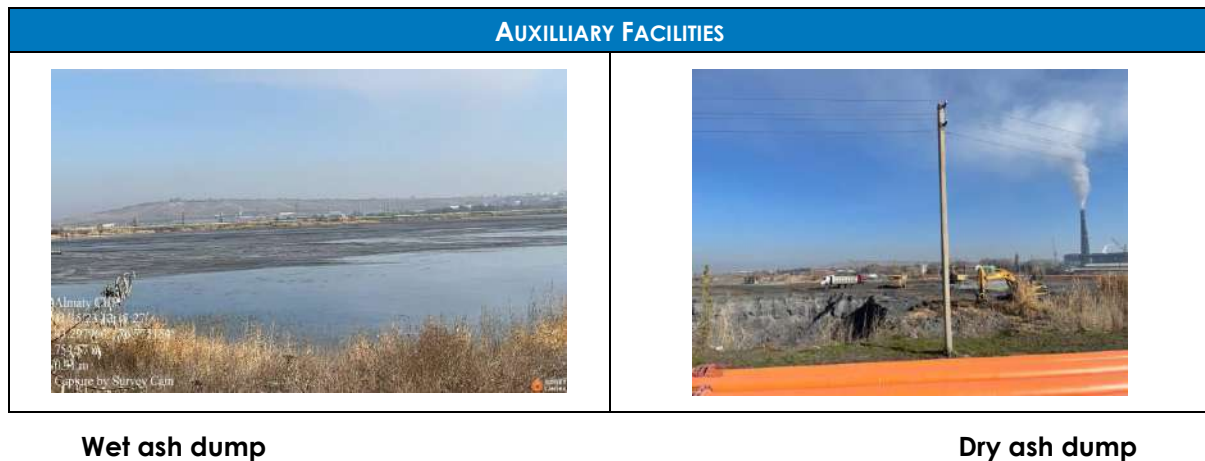


Figure 2-3 CHP-2 Overview (Auxiliary Facilities)



2.2 Land Use

The allocated land for the Project is highly modified, as it has been subject to previous use by the CHP-2 plant. The topography is varied and in the past has been engineered in areas due to cutting and fill, expected to be from the original coal plant construction and other structures. Site observations revealed the presence of abandoned buildings, heavy vehicles, tarmacked areas and decorative trees. Besides the trees, certain areas have become scrub like habitat, with brambles, grasses and other small shrubs.

Based on the site visit in November 2023, certain existing internal roads/tracks were degraded and recent rainfall had resulted in water accumulation (i.e. puddles) in areas across the site.

Selected photographs of the proposed Project site are presented below.

Figure 2-4 General Photos of the Proposed Project site





During the November 2023 site visit, on-going construction of the new gas pipeline that will supply the proposed CCGT with natural gas was observed. Activities associated with pipeline is under responsibility of local akimat.

It is understood that the construction of this associated facility is now complete.

Figure 2-5 Proposed Project (Associated Facility)

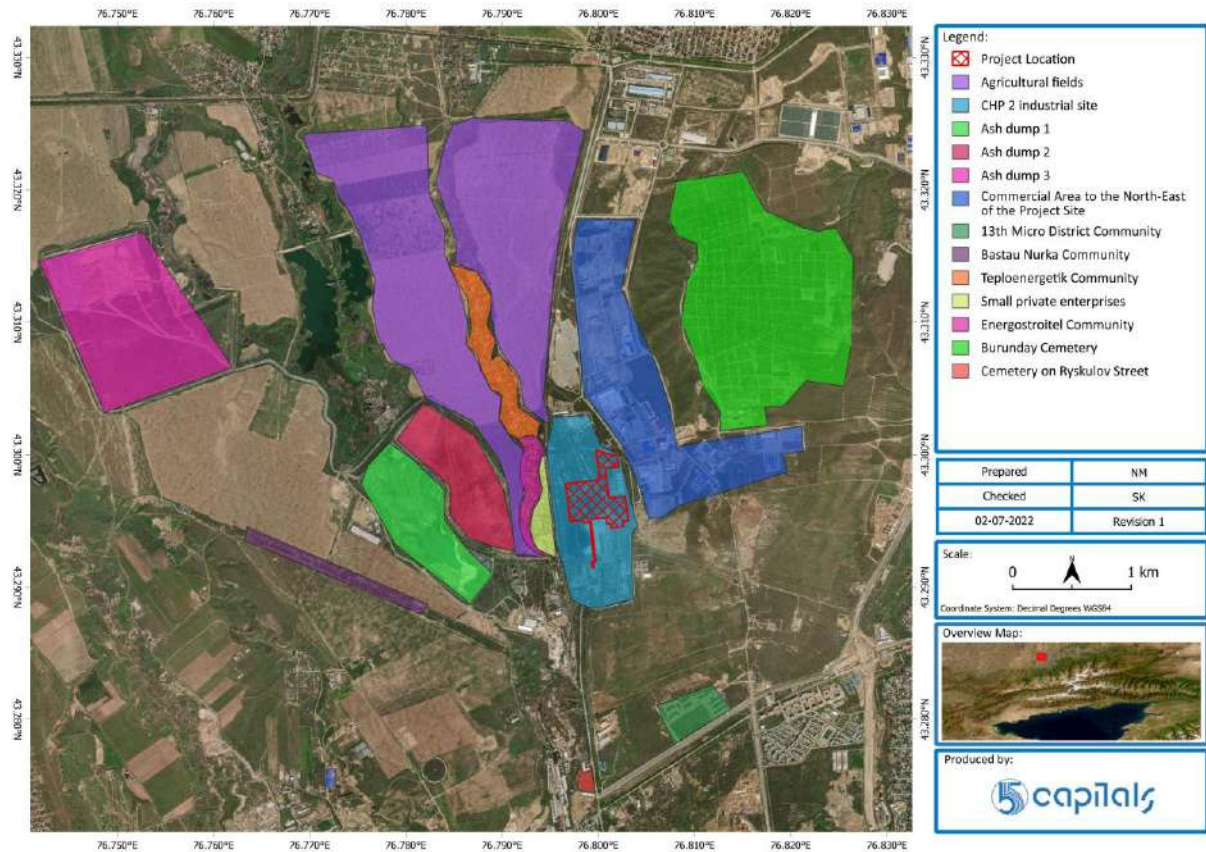


Land use at Health Protection Zone (500 meters) as well as along gas pipeline is provided in ESIA Addendum report.

2.3 Nearby Receptors & Sensitivities

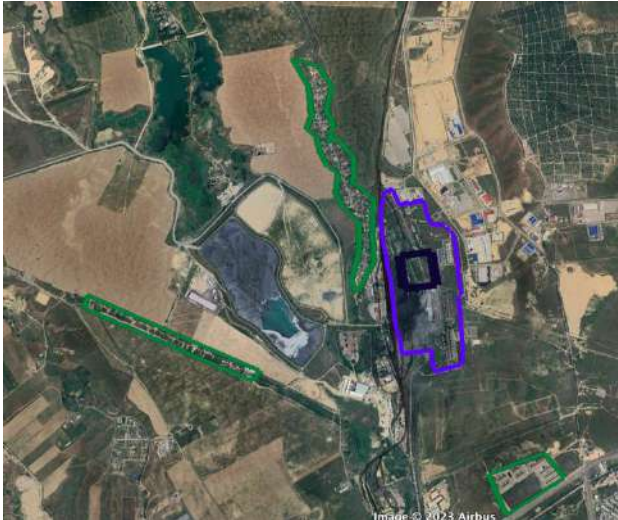
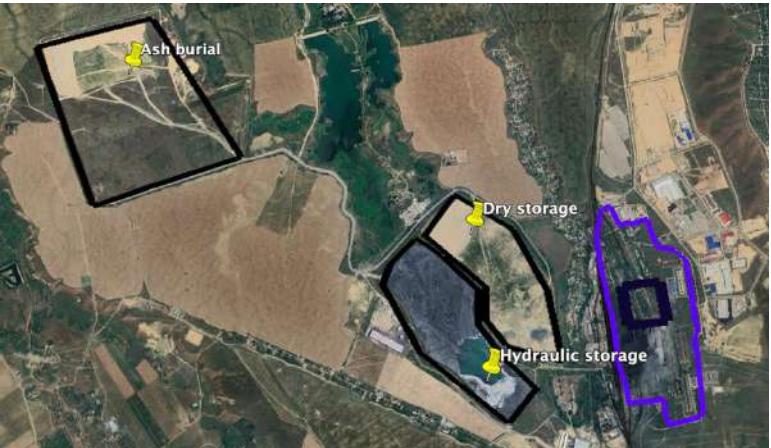
Areas surrounding the CHP-2 are occupied with residential and other infrastructure facilities. These are outlined in the figure below.



Figure 2-6 E&S receptors in Area of Influence (Aol) of the Project site



The table below provides description of features and E&S receptors in Aol of the Project.

Table 2-1 Features and Potential E&S Receptors in Project Aol

DESCRIPTION	LOCATION	PHOTO/MAP
<p>Living communities</p>	<p>There are 4 main living communities located in the surrounding area of the Project site:</p> <ul style="list-style-type: none"> - Teploenergetik – approx' 500 meters from CCGT boundaries - Energostroitel – approx' 250 meters from CCGT boundaries - Bastau Nurka – approx' 1.42 km from CCGT boundaries - 13th microdistrict – approx' 1.68 km from CCGT boundaries 	
<p>CHP-2 Ash Ponds</p>	<p>Coal ash is stored in 3 ash ponds:</p> <ol style="list-style-type: none"> 1) Ash station 1 – hydraulic storage 2) Ash station 2 – dry storage 3) Ash station 3 – ash burial 	

DESCRIPTION	LOCATION	PHOTO/MAP
<p>Local cemetery</p>	<p>The largest cemetery of Almaty city. The cemetery is located 1.17 km north-east of the plant on a hill.</p>	
<p>Waste sorting plant</p>	<p>Waste sorting plant where household waste is deposited sorted prior to transfer for recycling.</p>	



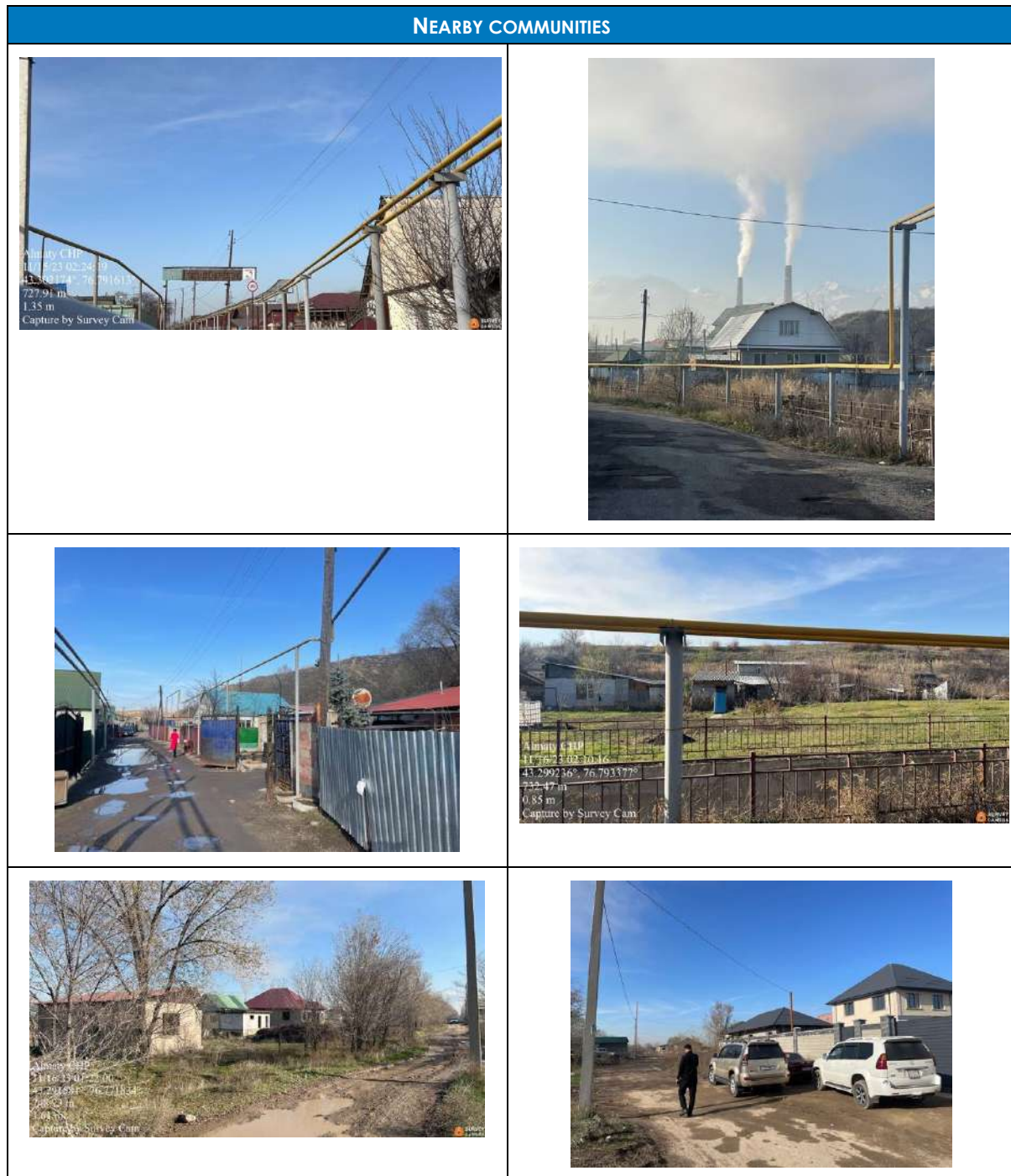
DESCRIPTION	LOCATION	PHOTO/MAP
<p>Other commercial enterprises</p>	<p>There are several enterprises mainly associated with production of construction materials (concrete) and car manufacturing plants in an area to the immediate north-east of the project between the proposed plant location and the cemetery. The area does not include living communities.</p>	
<p>Kokusek Reservoir</p>	<p>The Kokuzek reservoir is located approx' 2.31 km from the Project site. The Reservoir is considered as a private lake, with limited access.</p>	

Figure 2-7 Photos of Receptors (shown for reference purposes only)





ASH DUMP STATIONS



COMMERCIAL ENTERPRISES



CEMETERY





2.4 Project Facilities & Technology

2.4.1 Design Overview

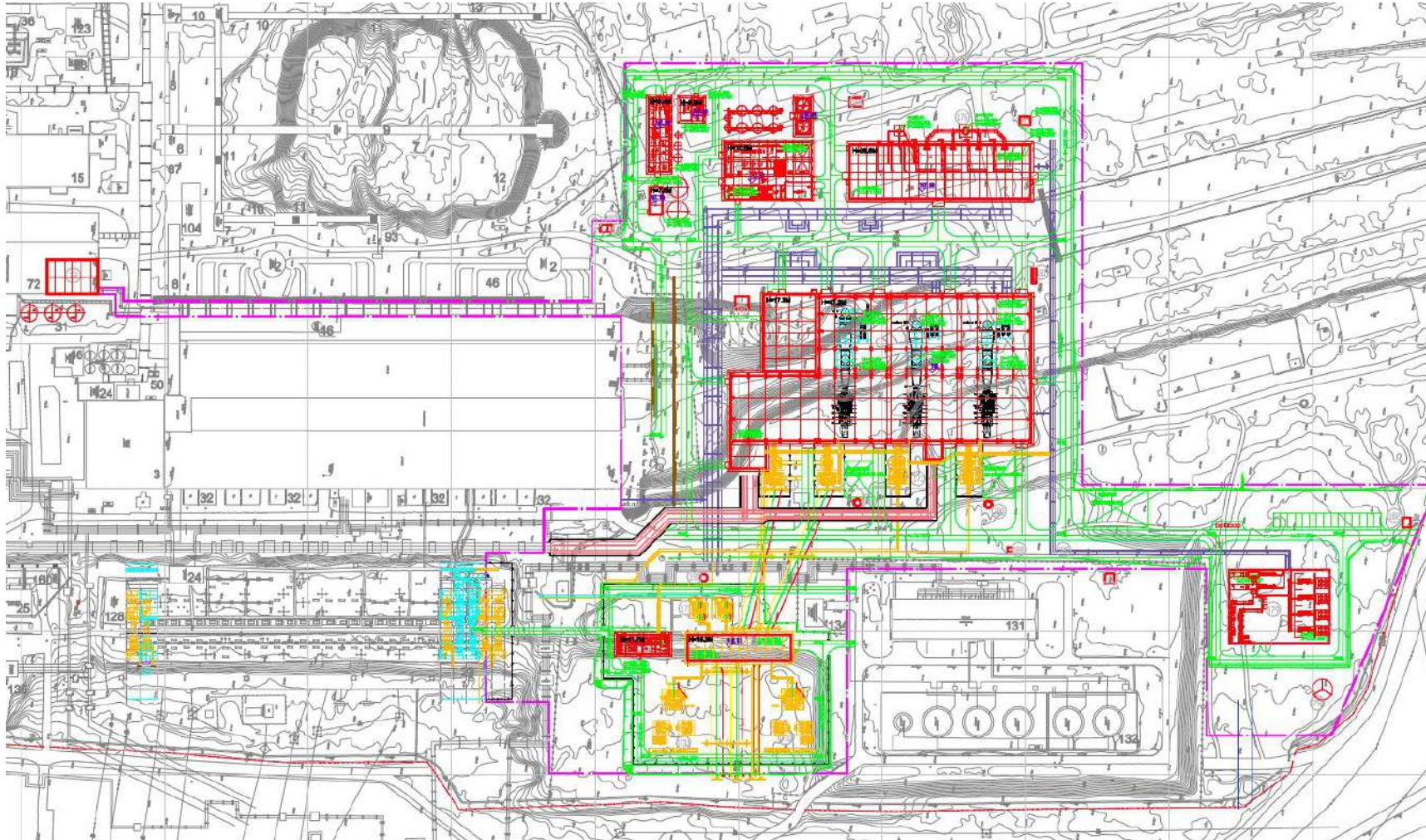
The configuration of the main equipment of GTUs in the selected option is as follows:

- One combined-cycle gas power unit (CCGT) consisting of one SGT5-2000E gas turbine (SIEMENS), one heat recovery boiler (DONGFANG) and one LZC80.5-7.49/(0.68)/510/(228) steam turbine (SIEMENS);
- Two gas turbine power units with cogeneration, each consisting of one SGT5- 2000E gas turbine (SIEMENS) and one hot water heat recovery boiler (DONGFANG).

In addition to power generation, the Plant will provide thermal energy for heating, ventilation and hot water supply during the heating period, and heat for hot water supply during the summer period.

The overall layout of the proposed plant is shown in the following figure.

Figure 2-8 Overall Plant Layout



2.4.2 Main Project Characteristics

The key design characteristics of the modernised Project when compared to the existing CHP-2 are summarised in the following table.

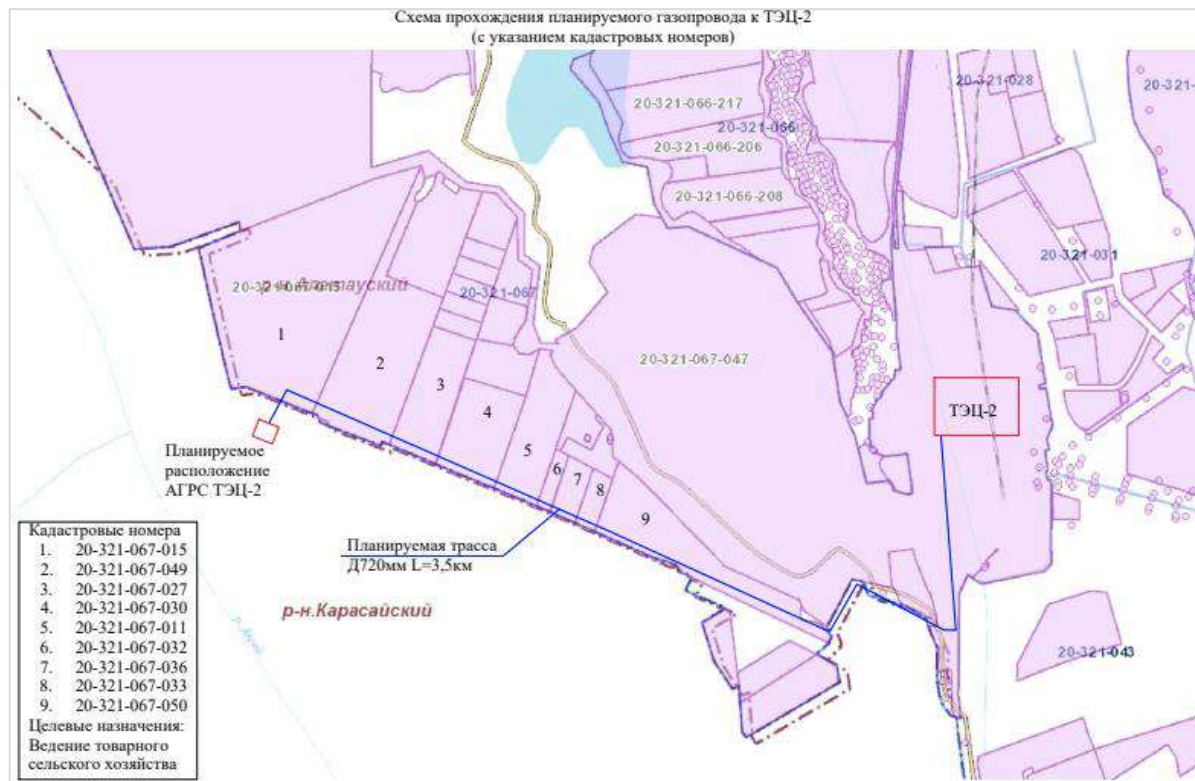
Table 2-2 Main Project Characteristics (Before and After Modernization)

CHARACTERISTIC	UNIT	BEFORE MODERNIZATION	AFTER MODERNIZATION
Installed Capacity - Electrical	MW	510	557
Installed Capacity – Heat	Gcal/h	1,411	957
Operational Capacity – Electrical	MW	312.8	535
Operational Capacity - Heat	Gcal/h	952.0	816
Design Heat Load	Gcal/h	648.6	816
Electrical Power Production	kWh/year	2,601,400,000	3,899,000,000
Electric Power Supply	kWh/year	2,213,000,000	3,742,000,000
Heat Power Supply	Gcal/year	3,241,100	4,020,000
Reference Fuel Consumption – electrical Power supply	g/kWh	428.8	196
Reference Fuel Consumption – Heat Power supply	Kg/Gcal	133.3	142

2.4.3 Fuel Supply

The gas supply system will include an external gas pipeline connection to the plant (an Associated Facility), as well as internal gas receiving station, metering equipment and forwarding facilities.

Figure 2-9 Constructed Gas Pipeline Route



The gas pipeline (outside of the Project boundaries) has been developed under a separate project aligned in schedule and technical specifications to the proposed Project by JSC “KazTransGas Aymak”. Construction of pipeline started in 4th quarter of 2023 and was completed in 2nd quarter of 2024. The overall length of pipeline is 5.5 km.

2.4.4 Water Supply

The main water source of the CHP-2 are artesian wells of the Talgar aquifer. The water is used to recharge the heating network and boilers, recharge the circulating system due to losses of technical water supply, and own needs of CHP-2.

The new modernised Plant will utilise the existing water supply system at CHP-2. Four independent circulating water supply systems are provided for cooling of the projected main and auxiliary equipment.

2.4.5 Wastewater Treatment

All wastewater generated at the Plant after on-site treatment will be diverted to an evaporation field (provided with measures to reduce seepage) that will be constructed at one of the sections of the existing ash dump. ‘Evaporation Fields’ are envisaged within the area in sections No. 1 and No. 2 of the Ash Dump No.1 with an area of 120 hectares (Ha). No additional land acquisition is expected for this purpose.

2.4.6 Cooling System

As outlined above, the Project will utilise the existing water supply sources and water supply system during its operation. Water will be used to cool the designed main and auxiliary equipment of the main building and hot water boiler house, auxiliary equipment of existing compressor rooms in a closed loop system. Four independent circulating water supply systems are provided for the Project, depending on the location of the designed and existing equipment.

2.5 Project Construction

2.5.1 Construction Phasing and Schedule

The Project will be developed in phases with the first phase of a 200 MWe unit. The construction is planned to be carried out in two stages: 45.5 months for the 1st stage and 20 months for 2nd stage. The total duration of Project construction will be 65.5 months. The estimated average number of construction workers at the main sites will be 629 people. The maximum number of employees at a time will be 726 people in the peak year of 2025.

The following tentative schedule is applicable at the time of preparing this ESIA Addendum.

- First stage: Hot water boilers – December 2025 (Commissioning)
- Second stage:
 - Start-up complex 1 – April 2026 (Commissioning)
 - Start-up complex 2 – June 2026 (Commissioning)
 - Start-up complex 3 – September 2026 (Commissioning)

3 LEGAL AND COMPLIANCE OBLIGATIONS

3.1 National Laws and Regulations

PUBLIC PARTICIPATION AND ACCESS TO INFORMATION

The main legal act that regulates public participation in Kazakhstan is the Environmental Code. It mandates the involvement of local communities in decision-making processes that impact environmental protection and sustainable development. This involvement begins at an early stage when multiple options are available, ensuring effective community participation. State bodies and officials are required to publicize planned decisions, allowing local communities to voice their opinions, which must be considered in the decision-making process. The Code also stipulates the disclosure of information about activities that may affect the environment to the local communities.

According to the Rules of Public Hearings, approved by the Order of the Acting Minister of Ecology, Geology, and Natural Resources of the Republic of Kazakhstan dated August 3, 2021, No. 286, as amended on October 26, 2021, public hearings are mandatory for projects potentially impacting the environment and human health, as well as for draft environmental protection plans. These hearings ensure equal rights for participants to express reasoned opinions based on available documentary materials. Participants include interested public members, NGOs, local executive and representative bodies, relevant governmental bodies, and the media.

The Project Developer is responsible for organizing public hearings to discuss the EIA materials. This includes co-ordinating with local executive authorities on the date and venue and publishing an announcement in the media at least 20 business days before the hearings. The public must be given access to EIA materials starting from the date of the announcement. The hearings will proceed regardless of the number of participants, who have the right to express their opinions and ask questions to the speakers. The results of the hearings will be recorded in minutes, reviewed by the Company and EIA developer, and may lead to project improvements based on public feedback. The Project Initiator is responsible for financing, technical, and information support for the public hearings.

Other key regulatory laws and regulations regarding public participation and access to information in Kazakhstan that promotes transparency, accountability, and citizen engagement in governance and decision-making processes are as follows:

- **Constitutional Rights:** The Constitution of republic of Kazakhstan (adopted on 30.08.1995) guarantees the right to information and public participation in environmental and governmental matters.

- **Public Hearings:** Various laws and regulations require public consultations for certain projects, policies, or legislative changes. These consultations allow citizens to provide input and feedback, influencing decisions that impact their communities.
- **Civil Society Engagement:** Non-governmental organizations (NGOs) and civil society groups play a role in advocating for transparency and facilitating public participation in policy-making and governance.

MANAGEMENT OF PUBLIC GRIEVANCES

The management of public grievances is regulated by various laws and regulations designed to address complaints and provide mechanisms for resolving disputes between the public and government or public service providers, including:

- Law of Republic of Kazakhstan on Public Councils No 383 – V-ZRK (November 2, 2015)

3.2 Lenders E&S Requirements

3.2.1 European Bank for Reconstruction and Development (EBRD)

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves the following elements: (i) stakeholder identification and analysis; (ii) stakeholder engagement planning; (iii) disclosure of information; (iv) meaningful consultation and participation leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them; (v) an effective grievance procedure or mechanism, and (vi) ongoing reporting to relevant stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life.

An essential element in the stakeholder engagement process, to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations, and preferences. Special attention should be

paid to the identification of vulnerable stakeholders. The engagement with these stakeholder groups needs to be planned and managed with special care.

Furthermore, the EBRD requires that the project developer establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints are received, handled, and resolved effectively, in a prompt and timely manner.

EBRD PR10 “recognises the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and where appropriate, other stakeholders as an essential element of Good International Practice (GIP) and corporate citizenship. Such engagement will involve the following key elements:

- Stakeholder Identification and analysis.
- Stakeholder engagement planning.
- Disclosure of information.
- Consultation and Participation.
- Grievance Mechanism.
- Ongoing reporting to relevant stakeholders.

With reference to vulnerable groups, PR10 states “The client will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable”. In addition, the client is required to “support active and inclusive engagement with project affected parties including disadvantaged or vulnerable groups”.

EBRD PR10 requires clients to establish a grievance mechanism to receive and facilitate the resolution of grievances from affected stakeholders, including affected communities.

3.2.2 ADB

The Asian Development Bank (ADB) have established an Operational Manual and Policy Statement that includes the need for an amount of consultation, participation and stakeholder engagement. Both documents set out the applicable requirements the banks investment projects should fulfil in the potential receipt of finance.

STAKEHOLDER ENGAGEMENT

ADB Operational Manual on “Project Design and Preparation: Item C- Consultation and Participation” requires meaningful consultation to be carried out with affected people and the consultation processes to be appropriately documented in the EIA, IEE, resettlement plan and/or IPP as applicable to the project.

The Operational Manual requires that vulnerable groups have sufficient opportunities to participate in consultations.

ADB Safeguard Requirement 1 on Environment: Consultation and Participation states that the client will undertake “*meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues*”.

ADB Safeguard Requirement 2 on Involuntary Resettlement: Consultation and Participation also requires meaningful consultation to be undertaken by the client as stated above for ADB Safeguard Requirement 1 but includes consultation with host communities and the need for the client to pay particular attention to the need of disadvantaged or vulnerable groups, especially those below the poverty line, the landless, the elderly, female headed households, women and children, Indigenous Peoples, and those without legal title to land.

ADB Safeguard Requirement 3 on Indigenous Peoples: Consultation and Participation requires “*the borrower/client will undertake meaningful consultation with affected Indigenous Peoples to ensure their informed participation in (i) designing, implementing, and monitoring measures to avoid adverse impacts on them or, when avoidance is not possible, to minimize, mitigate, and compensate for such effects; and (ii) tailoring project benefits that accrue to them in a culturally appropriate manner*”.

The 2009 ADB Safeguard Policy Statement: requires “*borrowers/clients to engage with communities, groups, or people affected by proposed projects, and with civil society through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities*”.

ADB Policy on Incorporation of Social Dimensions into ADB Operations: requires social dimensions should be included in ADB operations to ensure the social development outcomes especially for the poor, vulnerable and excluded groups. These social dimensions include

- Participation;
- Gender and development
- Social safeguards and;

- Management of social risks especially among vulnerable groups.

In pursuing social development outcomes, ADB encourages consultation with and participation by stakeholders (including the government, executing and implementing agencies, clients and/or beneficiaries, people affected by ADB – supported projects); provides them with opportunities to engage in key stages of the country strategy formulation, programming and project cycles and actively seeks where appropriate, the cooperation of non-government organizations and other civil society groups in formulating, designing, implementing, monitoring and evaluating projects.

ADB Policy on Promotion of Engagement with Civil Society Organizations: requires proactive, meaningful and productive engagement with Civil Society Organizations (CSOs) should be undertaken to explore opportunities for increasing their involvement in the design and implementation of ADB Operations where appropriate.

ACCOUNTABILITY MECHANISM (2012)

The Accountability Mechanism aims to offer an independent and effective platform for individuals negatively impacted by ADB-supported projects to express their concerns, seek solutions to their issues, and request a compliance review of alleged breaches by ADB of its operational policies and procedures that may have caused or could potentially cause them direct and significant harm.

The key change introduced in the 2003 to the Accountability Policy was the creation of two distinct yet complementary stages within the Accountability Mechanism:

- Consultation phase, which involves a Special Project Facilitator (SPF) to address the concerns of individuals impacted by ADB-funded projects using informal and flexible approaches; and
- Compliance review phase, which involves a Compliance Review Panel (CRP) to examine alleged breaches of ADB's operational policies and procedures that have caused or could cause direct and significant harm to affected people

GRIEVANCE REDRESS MECHANISM

According to the ADB Safeguard Policy Statement (2009), the bank “requires that the borrower/client establish and maintain a grievance redress mechanism to receive and facilitate resolution of affected peoples' concerns and grievances about the borrower's/client's social and environmental performance at project level. The grievance redress mechanism should be scaled to the risks and impacts of the project. It should address affected people's concerns and complaints promptly, using an understandable and

transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people".

ADB Safeguard Requirement 2 and Requirement 3 specifically requires the grievance mechanism to receive and facilitate the resolution of:

- Affected persons' concerns and grievances about physical and economic displacement and other project impacts, paying particular attention to the impacts on vulnerable groups (**ADB Safeguard Requirement 2 on Involuntary Resettlement**); Resolution of the affected Indigenous Peoples communities' concerns, complaints, and grievances (**ADB Safeguard Requirement 3 on Indigenous Peoples**)

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The stakeholders identified in this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the projects outcome either positively or negatively. These stakeholders may change over time and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

4.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. The stakeholders identified have been classified into the following categories:

- Impacted Stakeholders **(A)** – those who can be potentially affected by one or more of the potential impacts of the Project directly or indirectly.
 - e.g. potential environmental and social impacts of the Project assessed in the ESIA or ESIA Addendum.
- Interest-based Stakeholders **(I)** – Stakeholders concerned with elements of the Project, the Project's beneficiaries, national and international non-governmental organizations and the interested part of the civil society.
 - These are groups or organisations that are not adversely 'impacted' by the Project but whose interests determine them as stakeholders.
- Decision Making Stakeholders **(D)** – those who are involved in decisions relating to the development of the Project.

The Stakeholder Engagement Matrix is presented below based on these categories which also includes vulnerable groups. According to lenders, vulnerable groups are those people or groups of people who may be more adversely affected by project impacts than other by virtue of characteristics such as gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.

Based on the above, the following groups are considered vulnerable in the context of the proposed Project:

4.1.1 Stakeholder Engagement Matrix

Table 4-1 Stakeholder Engagement Matrix for the Project Site

ADMINISTRATIVE ORDER	STAKEHOLDER	RELEVANCE CATEGORY
Nearby Communities in Aol of the Project	Energostoitel community	A: Located approximately 250 meters from project. May be affected by construction activities (such as traffic, accidental damage to infrastructure, increased pressure on local resources) and operation stage (possible physical resettlement due to HPZ)
	Teploenergetik community	A: Located approximately 500 meters from project. May be affected by construction activities (such as traffic, accidental damage to infrastructure, increased pressure on local resources) and operation stage (possible physical resettlement due to HPZ)
	Bastau Nurka community	A: Located approximately 1,4 km from project. May be affected by construction activities (such as traffic, accidental damage to infrastructure, increased pressure on local resources)
	13th microdistrict community	A: Located approximately 1,68 km from project. May be affected by construction activities (such as traffic, accidental damage to infrastructure, increased pressure on local resources)
Vulnerable Groups	Elderly age residents relying on pension only, single parents, households generating income equal to minimum work wage	A: Residing within impacted communities
Businesses in Aol of Project	Businesses (mainly associated with production of construction materials (concrete) and car manufacturing plants) in an area to the immediate north-east of the project between the proposed plant location and the cemetery. The area does not include living communities.	A: Businesses that are subject to E&S impacts from various project aspects.

ADMINISTRATIVE ORDER	STAKEHOLDER	RELEVANCE CATEGORY
Local Government Authorities	Akimat of Alatau district	D: District-level planning and administration of development projects. Assisting in providing secondary data related to socio-economic information of communities nearby the Project.
	JSC "KazTransAymak"	D: Responsible for the construction and operations of the natural gas pipeline for the Project.
State Organisations	Committee on Sanitary and Epidemiological control under Ministry of Healthcare of the Republic of Kazakhstan	D: Review and approval of the Health Protection Zone of the Project. Should be consulted 1-year after commencement of the Project's operational phase.
Project Shareholders	Samruk Energy	D: Responsible for Project implementation, support with obtaining information related to Project design and other relevant data as required.
Non-Governmental Organizations (NGOs)	KazEcoPatrol ECOJER	I: Will be involved in discussion of proposed mitigation measures and disseminating information about the Project at ESIA Addendum disclosure
Project Lenders	EBRD ADB Other lenders (if any)	D: Providing finance for the Project

5 STAKEHOLDER ENGAGEMENT PROGRAMME

This chapter provides information on stakeholder identification and consultations for the Project that have been conducted during the ESIA Addendum Stage. The stakeholder identification process identified impact based, interest based and decision-making stakeholders.

5.1 Past Project Stakeholder Engagement

A standalone Stakeholder Engagement Plan (SEP) was prepared alongside the 2022 ESIA package. This document provides a summary of stakeholder engagements conducted, as well as the engagement program for the various stages of the SEP. For further details, please refer to Appendix A.

5.1.1 Public Hearings for National EIA

In line with the required regulatory process for EIA in Kazakhstan, public hearings dedicated to the Project were conducted on 29th November 2021 via face-to-face meetings, with some participants who were unable to join in person attending over Zoom (a web-based conferencing platform). Participants mainly included local citizen representatives of Almaty and other cities (e.g., Astana Shardara, Ekibastuz), NGOs (ECOJER, Eco Almaty) and representatives of the mass media.

Invitation for public hearing was published widely through local mass media, in particular in following sources:

- The Company's website on October 25, 2021 (<http://www.ales.kz/ru/novosti-kompanii/155-2021-god/1874-obyavlenie-o-provedenii-obshchestvennykh-slushaniy-2>);
- The Unified Environmental Portal (<https://ecoportal.kz/>);
- The Green Economy Department website on October 26, 2021 (<https://www.gov.kz/memleket/entities/almaty-eco/press/article/details/65461?lang=ru>) ;
- The information stand at the Public Reception of the Alatau District Akim's Office;
- The *Almaty Aqshamy* newspaper (#129, issue 6105) on October 26, 2021;
- The *Vecherniy Almaty* newspaper (#129, issue 1390) on October 26, 2021;

The "Almaty" TV channel on October 26, 2021.

Table 5-1 Summary of Conducted Public Hearing

DATE OF CONSULTATION	29/11/2021
TIME	15:00
VENUE	Meeting room of the chemical workshop, Algabas microdistrict, street 7, house 130
LANGUAGE	Kazakh and Russian
NUMBER OF PARTICIPANTS	Physical meeting – 86 participants Over Zoom - 32 participants
ALMATY CHP-2 PROJECT REPRESENTATIVES	3 in total
MATERIALS USED	Presentation
SUMMARY OF THE MEETING	
<p>Based on the records available, the following items were discussed during the public hearing:</p> <ul style="list-style-type: none"> • A summary of operational activities of the Almaty CHP-2, existing challenges and the need for its modernisation ; • Plans of the construction of the Project within the existing Almaty CHP-2 plant area; • Technical description of Project; • Existing air pollution issues in Almaty and how the existing CHP-2 makes its inputs to current state of air pollution; • ESIA outcomes. <p>At the end of the hearing the session moved to Questions & Answers</p>	
POST HEARING Q&A DISCUSSION TOPICS	
<ul style="list-style-type: none"> • Participants mainly raised questions on the timeline of Project implementation (i.e. in till 2026). The feedback was that such a timescale is too long. • Another question was in regard to the overall budget required for the Project. • Then participants discussed operational processes of the Project and whether tariffs for consumers will increase. • Representatives of the Project responded to all questions and participants were understood to have been satisfied with the provided responses. • At the end of the hearing participants provided their thoughts on the overall decision to transition from coal to gas. It is understood that participants expressed their very positive opinions on this and their positive expectations towards the planned Project. 	

5.2 Stakeholder Engagement During the ESIA Addendum (2023-2024)

The table below outlines the project stakeholders, categorized by their administrative roles and relationship to the project. It also details their consultation and disclosure schedules, methods of engagement, and feedback regarding environmental and social issues.

Table 5-2 Overview of project stakeholders, and their respective engagement modes, consultation agenda and inputs

ADMINISTRATIVE ORDER	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	CONCERNS RAISED & AND RESPONSE PROVIDED
Communities in Aol of Project	Energostroitel community - including vulnerable groups: women, the elderly, youth, people living with disabilities, poor households, illiterate members of the community	A: Located approximately 250 meters from project	<ul style="list-style-type: none"> • Disclosure of project plans, potential E&S impacts, and mitigation strategies. • Request for information on potentially impacted public infrastructure and resources. • Request for specific information on local demography, household economy and social services. • Establishment of the Project's external Grievance Redress Mechanism (GRM) 	<ul style="list-style-type: none"> • Face to face meeting; • Household surveys 	Community members were concerned about potential resettlement due to the publication of the Resettlement Action Framework (RAF) on Samruk Energy's website. Representatives from 5C and SEPCO 1 clarified the RAF's purpose and registered a grievance about the Project's plans for the HPZ and possible resettlement. KAZ Ales provided a formal response, which was shared with the community, and no further concerns were raised after that.
	Teploenergetik community - including vulnerable groups: women, the elderly, youth, people living with disabilities, poor households, illiterate members of the community	A: Located approximately 500 meters from project	<ul style="list-style-type: none"> • Disclosure of project plans, potential E&S impacts, and mitigation strategies. • Request for information on potentially impacted public infrastructure and resources. • Request for specific information on local demography, household economy and social services. 	<ul style="list-style-type: none"> • Face to face meeting; • Household surveys 	Community members were concerned about potential resettlement due to the publication of the Resettlement Action Framework (RAF) on Samruk Energy's website. Representatives from 5C and SEPCO 1 clarified the RAF's purpose and registered a grievance about the Project's plans for the HPZ and possible resettlement. KAZ Ales provided a formal response, which was shared with the community, and no further concerns were raised after that.

ADMINISTRATIVE ORDER	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	CONCERNS RAISED & AND RESPONSE PROVIDED
			<ul style="list-style-type: none"> Establishment of the Project's external Grievance Redress Mechanism (GRM) 		
	Bastau Nurka community - including vulnerable groups: women, the elderly, youth, people living with disabilities, poor households, illiterate members of the community	A: Located approximately 1,4km from project	<ul style="list-style-type: none"> Disclosure of project plans, potential E&S impacts, and mitigation strategies. Request for information on potentially impacted public infrastructure and resources. Request for specific information on local demography, household economy and social services. Establishment of the Project's external Grievance Redress Mechanism (GRM) 	<ul style="list-style-type: none"> Face to face meeting; Household surveys 	Residents of Bastau Nurka requested the Project's help to improve living conditions, such as connecting to water and gas supplies and repairing roads. However, since these issues are managed by the local municipality, the project team couldn't address them. After being informed of this, most residents refused to participate in the survey, with only one person agreeing to respond
	13th microdistrict community - including vulnerable groups: women, the elderly, youth, people living with disabilities, poor households, illiterate members of the community	A: Located approximately 1,4km from project	<ul style="list-style-type: none"> Disclosure of project plans, potential E&S impacts, and mitigation strategies. Request for information on potentially impacted public infrastructure and resources. Request for specific information on local 	<ul style="list-style-type: none"> Face to face meeting; Household surveys 	N/A No comments or concern were raised during engagement

			demography, household economy and social services. <ul style="list-style-type: none"> Establishment of the Project's external Grievance Redress Mechanism (GRM) 		
Local Government Authorities	Akimat of Alatau district	D: -District-level planning and administration of development projects. -Assisting in providing secondary data related to socio-economic information of communities nearby the Project.	<ul style="list-style-type: none"> Request for information on secondary data related to socio-economic profile of communities nearby the Project, in particular for Bastau Nurka Establishment of the Project's external Grievance Redress Mechanism (GRM). 	Business correspondence /face to face meeting	<ul style="list-style-type: none"> Provided very general information about Teploenergetik and Energostroitel communities. No information was available for Bastau Nurka, mainly because this community is still being developed
	JSC "KazTransAymak"	D: Responsible for construction of gas pipe for Project.	<ul style="list-style-type: none"> Request for information related to construction of gas pipe (technical characteristics of the pipe, details of impacted land users, process of covering temporary impacts etc) 	Business correspondence	JSC "KazTransAymak" provided very general information, mainly limiting with description of gas pipe construction timeline and sharing cadastral map demonstrating the cadastral number of impacted land plots. In addition, JSC stated that their scope of work included construction of gas pipe only and no assessment has been done.

Lenders	EBRD ADB Other lenders	D: Providing finance for the Project	Feedback on the identification, assessment and management of project-related E&S risks, in the Project's planning and implementation stages.	Formal dialogue as part of initial E&S due diligence, and subsequent E&S monitoring.	N/A – On-going
----------------	------------------------------	---------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------	----------------

5.3 ESIA Addendum Public Disclosure

Public disclosure meetings with Project stakeholders were conducted on November 25th and 26th 2024. Prior to the meetings, stakeholders were notified one-week ahead by sharing invitations over public media (publishing announcement in local newspaper and TV channel) as well as sharing it over social media channel (via WhatsApp groups of each affected community).

During the meetings, each stakeholder group has been provided with presentation and leaflets reflecting main information about impact assessment and proposed mitigation measures.

Summary of the conducted meeting is provided in the table 5-9 below.

Table 5-3 ESIA Addendum Package - Public Disclosure Programme

STAKEHOLDER NAME	TARGET GROUP AND METHOD OF ENGAGEMENT/ DISTRIBUTION MATERIALS	DATES & VENUE	RAISED FEEDBACK/CONCERNS AND RESPONSE PROVIDED
All impacted communities and interested parties	<p>Target group – meeting with residents of affected communities, including youth, unemployed people. In addition, all other community residents, representatives of all interested parties</p> <p>Materials distributed – project presentation & project leaflets</p>	<p>Conference hall of Almaty CHP 2 (address (Almaty CHP2, 130, 7th street)</p> <p>November 25th 11:00 – 12:10</p>	<p><u>Key topics raised by attendees:</u></p> <ul style="list-style-type: none"> a) It was suggested to use a highway crossing the industrial zone (located to the east of Project side) to avoid traffic impacts to the highway located south of the Project which is actively used by nearby communities. b) It was requested to share the conclusion from local regulator on establishment of HPZ, once in place. c) A question on the possibility of reducing HPZ from 500 m to a reduced distance was raised. <p><u>Responses by KAZ ALES:</u></p> <p>Meeting participants were informed that all Project related information, including Conclusion on HPZ, ESIA addendum package, as well as all other future documentation will be published on ALES website.</p> <p>Traffic Management Plan will be shared with communities.</p> <p>In addition, participants were informed that based on local legislation as well as Lenders E&S requirements there will be on-going engagement in the framework of</p>

STAKEHOLDER NAME	TARGET GROUP AND METHOD OF ENGAGEMENT/ DISTRIBUTION MATERIALS	DATES & VENUE	RAISED FEEDBACK/CONCERNS AND RESPONSE PROVIDED
			<p>Stakeholder Engagement Plan at construction and operation stages.</p> <p>Separate to the above, an NGO "ECOJER" raised two questions (a) when the operation of CCGT is expected, (b) does ALES expects changes in technology of CCGT.</p> <p>Response by KAZ ALES: it was stated that CCGT operation is expected in 2027, and no changes are expected in Project technology.</p>
NGO - KazEcoPatrol	Consultations with the head of NGO "KazEcoPartrol"	Dustlik centre November 25 th 13:45- 14:45	<p>KazEcoPatrol raised 2 questions:</p> <ul style="list-style-type: none"> a) How is Project going to store and utilize butane both (C₄ H₄) construction and operation stages? b) How did the project assess the financial risks associated with the increase in the cost of CCGT technology/equipment? <p>Response by 5C: Head of NGO was informed that his questions will be registered as GRM and he will receive written response within 14 days.</p> <p>KazEcoPartrol proposed the following initiatives for the Project:</p> <ul style="list-style-type: none"> a) Greening and landscaping/ planting as much as possible trees in HPZ of Project and ash dump stations/surrounding areas. b) It was suggested to plant trees along the access road of CHP2 to avoid dust increase. c) To facilitate construction works as much as possible to ensure the Project operation stage as soon as possible. d) It was proposed to purchase the CCGT components now and store them at CHP 2, since prices may increase next year. <p>Response by 5C: Head of NGO was informed that proposed activities with landscaping as well as advanced purchase of CCGT equipment will be</p>

STAKEHOLDER NAME	TARGET GROUP AND METHOD OF ENGAGEMENT/ DISTRIBUTION MATERIALS	DATES & VENUE	RAISED FEEDBACK/CONCERNS AND RESPONSE PROVIDED
			shared with Project Developer for the consideration.
Teploenergetik community	Target group – Vulnerable people, door to door walkover to cover elderly age and people with disabilities who were not able to attend the meeting Materials to distribute –project leaflets.	At Teploenergetik community November 25 th 16:50-17:20	No questions/concerns were raised
Businesses around the Project site	Target group – owners and workers of businesses. Materials to distribute–project leaflets	At each location of business entity November 26 th 09:30 – 12:20	No questions/concerns were raised
13 th micro district community	Target group – Vulnerable people, door to door walkover to cover elderly age and people with disabilities who were not able to attend the meeting Materials to distribute –project leaflets.	At 13 th micro district November 26 th 11:10 – 11:30	No questions/concerns were raised
CHP 2 workers	Target group – workers of CHP 2 Materials to distribute– project presentation & project leaflets	Conference hall of Almaty CHP 2 (address (Almaty CHP2, 130, 7 th street) November 26 th 13:30- 14:00	No questions/concerns were raised
Akimat of Alatau district	Target group – akimat's departments relevant to Project Materials to distribute – project	Alatau akimat office November 26 th 15:00- 15:40	Following questions were raised by deputy mayor a) Contact details of party responsible for construction of workers accommodation was asked, as there was a compliance from local

STAKEHOLDER NAME	TARGET GROUP AND METHOD OF ENGAGEMENT/ DISTRIBUTION MATERIALS	DATES & VENUE	RAISED FEEDBACK/CONCERNS AND RESPONSE PROVIDED
	presentation & project leaflets		<p>communities related to certain construction activities.</p> <p>Response: KAZ ALES provided contact details of environmental specialist from SEPCO 1 to deputy mayor immediately. SEPCO 1 confirmed that issue has been solved and reported to akimat on November 27th.</p> <p>b) It was asked if existing CHP 2 is working on full capacity and if modernisation also assumes construction of gas storage.</p> <p>Response: ALES representatives responded that CHP 2 is working on its full capacity, and no gas storage will be constructed. Gas supply will be managed through the 5,5 km gas pipeline constructed for the Project by JSC "QazaqGaz Aimak".</p> <p>c) It was asked if ALES is going to involve foreign workers for CCGT operation period.</p> <p>Response: ALES informed that international experts will be involved for CCGT maintenance and commissioning periods only. Existing CHP 2 workers will be re-trained to work at CCGT.</p>
Energostroitel community	Target group – Vulnerable people, door to door walkover to cover elderly age and people with disabilities who were not able to attend the meeting Materials to distribute –project leaflets.	At Energostroitel community November 26 th 16:20 – 16:40	No questions and concerns were raised
Bastau Nurka community	Target group – Vulnerable people, door to door walkover to cover elderly age and people with disabilities who were not able to attend the meeting Materials to distribute –project leaflets.	At Bastau Nurka community November 26 th 17:00 – 17:25	No questions and concerns were raised. However, community was extremely concerned about construction activities undertaken for gas pipeline near the Bastau Nurka. It was requested that JSC QazaqGaz should reconstruct the access road of the community which was used by company during the construction. ALES representatives informed that community activist that they will facilitate the dialogue of community

STAKEHOLDER NAME	TARGET GROUP AND METHOD OF ENGAGEMENT/ DISTRIBUTION MATERIALS	DATES & VENUE	RAISED FEEDBACK/CONCERNS AND RESPONSE PROVIDED
			council with JSC QazaqGas to solve the problem

5.4 Online disclosure

The full ESIA addendum documents, i.e., Non-Technical Summary (NTS) and Stakeholder Engagement Plan (SEP) will be disclosed on KAZ ALES website (<http://www.ales.kz/ru/> <https://www.ales.kz/kk/>) in Kazakh and Russian languages.

PREVIOUS ONLINE DISCLOSURE

ESIA package developed for Project in 2022 was disclosed on following websites:

- The European Bank for Reconstruction and Development
<https://www.ebrd.com/work-with-us/projects/esia/almaty-chp-coal-phase-out-project.html>
- Asian Development Bank - <https://www.adb.org/projects/56169-001/main>
- KAZ ALES - <https://www.ales.kz/otchyot-po-rezultatam-ekologicheskoy-i-sotsialnoy-ekspertizy-proekta-modernizaczii-almatinskoj-tecz-2-imeni-a-zhakutova-inzhenerom-ebr-kompaniej-erm/>

5.5 Stakeholder Engagement Programme During Construction and Commissioning

Construction and commissioning related engagement processes are set out below and will be the responsibility of the EPC Contractor, although the Project Company will approve and ensure related oversight.

Table 5-4 Construction Phase SEP timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
<p>Notify stakeholders of construction and commissioning activities including the timelines.</p>	<p>Directly and indirectly impacted stakeholders.</p>	<p>Official announcements in form of written notices will be posted at project site entry points and at strategic locations along the project sites and access roads, to advise of construction and commissioning commencement.</p> <p>Official announcements via electronic notices and/or community meetings will also be undertaken with directly impacted stakeholders to inform them of the construction commencement and any changes in project construction schedule.</p>	<p>EPC Contractor will keep stakeholders informed through official announcements via electronic communication and/or community meetings to be undertaken biannually throughout construction phase of the project and/or if there are any significant changes to construction activities or processes.</p>
	<p>Relevant local governmental organisations and NGOs.</p>	<p>Written notices in coordination with relevant local governmental organisations will be sent to provide information on construction and commissioning activities and timelines.</p>	
<p>Communication of emergency preparedness and action plan</p>	<p>Community Representatives/Leaders and businesses near the project.</p>	<p>Bilateral meetings will be held with local authorities and community leaders and owners of businesses to inform them of the emergency plan and to accommodate any concerns from their side. A purpose for this will be to understand if there is a need for further sensitization of the households in potential risk areas.</p>	<p>Prior to the start of construction and commissioning and updated if key changes to the plan occur.</p>
	<p>Local governmental organisations (including utilities and emergency service providers)</p>	<p>Written notices to inform relevant agencies about the emergency response procedures in place and any required co-ordination for specific events.</p>	

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Sensitization to GBV and SEA/SH Prevention and Response	Women, men, and youth within communities near the Project sites.	Holding meetings with women and youth in the Project area and encourage them to report any instances of GBV and SEA/SH that may occur from Project workers. This will be undertaken in a culturally appropriate manner by a gender specialist.	On a quarterly basis throughout construction phase of the project.
Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for project staff, etc.)	Project Lenders.	E&S audits to assess compliance with the ESAP and regulatory requirements and other applicable requirements stipulated by Project Lenders.	On a quarterly basis throughout construction and commissioning phase of the Project.
Implementation of the grievance mechanism	All identified stakeholders.	As described in Section 6 of this document	Established at the start of construction and commissioning phases and updated throughout to facilitate rapid and effective response.

5.6 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the Project will be the responsibility of the Project Owner. It will be important for the Project Owner to ensure a smooth transition between stakeholder engagements from construction and commissioning phase to operational phase of the Project by understating the approaches that have been most effective during construction and commissioning phases. It will be important to sustain these techniques to avoid decrease in the frequency of stakeholder engagements, as the stakeholders are already familiar with the typical processes for engagement.

Table 5-5 Operational Phase SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
<p>Notify stakeholders of the transition from construction/commissioning to operations</p>	<p>Directly and indirectly impacted stakeholders.</p>	<p>Official announcements in form of written notices will be posted at entry points within project sites and strategic locations along the access road to advise of commencement of the operational phase of the Project.</p>	<p>At least 2 months prior to commencement of operations.</p>
	<p>Relevant local governmental organisations and NGOs</p>	<p>Written notices in coordination with relevant local governmental organisations will be issued to provide information on operational phase activities and timelines.</p>	
<p>Upon development of or updates to related emergency preparedness and action plan, or other HSE related matters that may affect external parties</p>	<p>Residents in communities and businesses near project sites.</p>	<p>Key informative Interviews (KIIs) will be held with local authorities and community leaders and owners of businesses to inform them of the emergency plan and to optimise with any concerns from their side. Based on the outcome of these meetings, it will be decided in coordination with local government whether ad-hoc community meetings are necessary.</p>	<p>2 months prior to the commencement of operations and updated if there are key changes to the plan occur.</p>
	<p>Local governmental organisations (including utilities and emergency service providers).</p>	<p>Written notices informing the applicable government agencies/authorities about the emergency response procedures in place and any required co-ordination for specific events. Bilateral meetings will be held where necessary.</p>	
<p>HPZ Application and Determination</p>	<p>Committee on Sanitary and Epidemiological control under Ministry of Healthcare of the Republic of Kazakhstan</p>	<p>As per the required method for applications on HPZ that will require 1-year of air quality monitoring data and emissions modelling.</p>	<p>Within the first year of operations for the monitoring, modelling and application.</p>
<p>Results of Conclusion on HPZ distance</p>	<p>Directly affected communities</p>	<p>Written notification to Teploenergetik and Energostroitel communities on outcomes of decision</p>	<p>Once Conclusion is received from the Committee on</p>

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
		<p>of Sanitary and Epidemiological Committee for the distance of HPZ established for Project</p> <p>Note: Depending on the outcome, further engagement may be necessary and would be updated to this SEP.</p>	<p>Sanitary and Epidemiological control under Ministry of Healthcare of the Republic of Kazakhstan</p>
<p>Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for project staff, etc).</p>	<p>Project Lenders and other interest-based stakeholders.</p>	<p>E&S audits to assess compliance with the ESAP, regulatory requirements and applicable requirements stipulated by Project Lenders.</p>	<p>On an annual basis throughout operational phase of the project.</p>
<p>Implementation of the grievance mechanism</p>	<p>All identified stakeholders—including project workforce.</p>	<p>As described in Section 6 of this document.</p>	<p>Established at the start of operations and managed throughout the entirety of the operational phase to facilitate rapid and effective response.</p>

5.7 Measures to Avoid Reprisal

During engagements, stakeholders must be able to provide their feedback and raise concerns without fear of retaliation (e.g., threats, intimidation, harassment or violence) to ensure meaningful engagement. The following will therefore be implemented:

- Adopt a zero-tolerance policy to reprisals which will be reflected in project-specific Codes of Conduct.
- Raise awareness among staff involved in engagement processes to ensure implementation of project-specific codes of conduct and train employees on expectation of their behaviours when communicating with host communities.
- If risks of retaliation become an issue (e.g., when stakeholder raise or signal concerns about their safety for expressing their opinions,) the stakeholder engagement process may need to be adapted to ensure safety of the participants (e.g., not publicly disclosing venue locations or dates of engagement).
- Participants will be informed on the purpose of engagement and their consent will be obtained prior to signing attendance sheets. Participants will be informed about how this information will be used and given the option to not disclose their identity.
- Allegations of reprisals will be addressed with immediate effect. Responses will be taken in consultation with those at risk and measures for responding to reprisal and implementation will be agreed upon with victims. Personal information will not be disclosed.

6 GRIEVANCE MECHANISM

The Project's activities (during construction, commissioning and operation) may result in potential nuisances for stakeholders, or environmental and social impacts and as such the establishment of a grievance mechanism to address potential complaints from affected parties. The aim of the grievance mechanism is establishing a system to receive and facilitate resolution of the stakeholders' concerns and grievances about the Project.

The grievance mechanism is an important part of stakeholder engagement and will be in place from the E&S disclosure process, throughout construction and operations through to the end of the Project lifespan. The grievance mechanism will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

The overall responsibility and accountability for the grievance mechanism will be held by the Owner, as this will primarily relate to communications with external parties. However, implementation may be delegated and fall under separate parties depending whether the grievance is related to the construction, commissioning or the operational phases, i.e., EPC Contractor during construction and commissioning.

6.1 Key Principles of the Grievance Mechanism

The grievance mechanism for the Project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the Project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where communities cannot read;
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance; and
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

6.2 Scope of the Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' problems and concerns regarding project activities.

All relevant claims from affected stakeholders will be accepted and no judgment made prior to investigation, even if complaints are minor. This includes complaints in relation to gender-based violence, sexual exploitation and abuse, sexual harassment, conflict between project employees and community members etc.

However, according to good practice, the following claims will be directed outside of Project-level mechanisms:

- Complaints clearly not related to the project based on assessment of their legitimacy.
- Issues related to governmental policy and government institutions.
- Complaints constituting criminal activity and violence, which will be referred to law enforcement and the judicial system.
- Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

In the event that any of the grievances are rejected at the screening stage, the complainant will be informed of this decision including a justification why.

6.3 Steps in Managing the Grievance Mechanism

6.3.1 Publicising the Grievance Management

Stakeholders categorized as "Affected Entities (A)" will be informed about the purpose and structure of the GRM, and the process for the management of project-related grievances at the early stages of the ESIA. For affected communities and vulnerable constituencies in particular, the introduction of the GRM will create awareness around the stakeholders' rights to invoke the Project's GRM facilities. The following methods will be used for publicizing the GRM:

- Formal consultative letters/ correspondence.
- Official announcements.
- Community meetings.
- FGDs and KIIs.

The GRM will be widely publicized within project-affected communities, including using this SEP and project leaflets. The information provided will be available in both Kazakh and Russian languages and will include the following:

- What Project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e., all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

6.3.2 Submitting a Grievance

The GRM will allow for the delivery of oral and/or written grievance by aggrieved entities. Reporting channels for external grievances will include:

- General consultation forums (i.e., community assemblies, FGDs, KIIs).
- Phone calls.
- Email correspondence.
- Grievance box at publicly accessible entry points to the site and Almaty CHP-2.
- Written/ oral delivery to project personnel, including CLOs and security personnel (security personnel at the Project's entry points and site office(s) must be aware and trained to deal with any grievances appropriately).

Information will be provided at the entrances of the plant, at the location of grievance boxes to inform people about the process and timeline to follow up their grievances.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the relevant CLO (or other competent members of the E&S team) who will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured. Where the respective E&S personnel are not available, security staff will take the grievances and ensure these are registered via the formal grievance process.

If an anonymous grievance (e.g. letter or email without details about the complainant) or the grievant requests to remain anonymous is submitted, the grievance will also be accepted and processed.

6.3.3 Keeping Track of Grievances

Upon receipt of grievances through the above-listed information channels, the steps below will be followed to ensure all grievances are adequately investigated in order to avoid leaving any issues or concerns raised opened.

- The grievance will be recorded in a form of register. The register will contain:
 - Details of the grievance;
 - The personnel/division(s) responsible for resolving the grievance;
 - Process tracking fields (receipt dates, status, result dates);
 - Response provided to the complainant;
 - Corrective and preventive actions taken to prevent reoccurrence of such complaint; and
- The grievances will be acknowledged as soon as possible (no later than a week from reception) by sending a formal confirmation with a complaint number and a timeline for response to the complainant to assure the complainant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people or those relating to sexual abuse and harassment or gender-based violence, where a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

6.3.4 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organize the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, an extensive investigation may be required to prevent escalation of the issue. The accountable party remains the Project Owner, although the investigation and review may be delegated to the EPC Contractor, at the construction stage.

The grievance mechanism must conform to the principle of 'no cost'. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with complainants and site visits will be undertaken, as appropriate.

All grievances will be investigated by the responsible Project party within two weeks of submission. Where grievances require a longer duration for investigation, the grievant will be informed of this delay and advised of the expected timeline for a response.

In cases of sensitive grievances (such as those involving multiple interests or those relating to sexual abuse and harassment or gender-based violence or community related conflict), it may help to engage outside organizations in a joint investigation or allow for participation of local or national authorities only if the complainants agree to this approach.

6.3.5 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be differential depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism allows for resolution options appropriate for different types of grievances to be provided. For example, these options may include altering or halting harmful activities or restricting their timing and scope (e.g., for construction dust, noise or access road noise), facilitating reconciliation and pardons, and revising the stakeholder engagement strategy.

Resolution to the grievance will be communicated to the grievant either in written format or verbally depending on what format the grievant has selected as preferred, but in all cases a written record will be maintained. In cases where the grievance/claim is rejected or where the company does not require action, the company representative will be diplomatic when informing the grievant about the outcome of the eligibility review process so as to prevent conflict from escalating.

Where the claim is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the company would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant can take the dispute resolution mechanism outside of the company grievance mechanism (external mechanism).

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and evidence that necessary actions have taken place will be collected. Such evidence includes:

- Conducting a meeting with the complainant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the claim; and

- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within 2-weeks of notification of dissatisfaction by the grievant.

6.4 Grievance Mechanism during Construction and Commissioning Phase

The construction and commissioning phase will require two separate grievance mechanisms to be implemented for the following parties:

- Internal parties; Construction and commissioning workers and staff (including sub-contractors' workers, staff and visitors); and
- External parties.

Although the Project Owner will remain responsible and accountable, the EPC Contractor will manage the internal and external grievance mechanisms. A member of staff will be assigned the responsibility to receive and follow up on all grievances. They will also be required to train related staff (as outlined below). Grievances will be investigated by the EPC Contractor and may require co-ordination with the Project Owner or other sub-contractors. All received grievances will be acknowledged within a week of receipt, or quicker depending on the urgency of the grievance.

Adequate resources will be allocated to the assigned staff member responsible for managing stakeholder engagement. This designated staff member will also be responsible for following up and managing grievances. An additional team or part of an existing team may support the member of staff; however, the staff will be experienced in engagement processes and will be familiar with the lender requirement for stakeholder engagement.

External grievance forms will be made available in Kazakh, Russian and if required in English at the publicly accessible site entrance gate of Almaty CHP-2. Sealed and locked 'grievance boxes' will be made available at the Project site entrance for grievance form submission. The contact details of the E&S Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed. The process for recording, reviewing, following up and responding to will be the same as detailed in section 6.8.

Where external complaints are received by telephone, letters or email these will also be formally recorded and followed up appropriately by the designated representative. The solution to the grievance will be communicated to the grievant depending on the format the grievant has selected as preferred. In cases where the grievance/complaint is rejected, the

company representative will be diplomatic when informing the grievant about the outcome of the resolution process so as to prevent conflict from escalating.

The company would re-assess the situation, organise a meeting with the complainant and local community members responsible for arbitration during conflicts or mediating of conflicting groups to discuss and clarify the findings and make sure that all alternatives within the grievance mechanism are explored.

Formal records of the grievance submission, investigation, determination of root cause (if any), corrective and preventative actions and any follow up (including monitoring) will be recorded in a grievance follow up form and maintained as documented information, with all other associated evidence of follow-up or corrective/close-out actions.

The follow up form will state all actions taken to resolve the grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder, which will be made available for review to applicable external parties such as independent environmental and social auditors.

Note: *Personal data and records will be protected and only used for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.*

6.5 Grievance Mechanism during Operational Phase

The grievance mechanism in the operational phase of the Project will be similar to that of the construction and commissioning phase. The grievance mechanism will be available for both internal and external parties.

A member of staff will be assigned and responsible for managing internal and external grievances received (recording, reviewing, investigating and responding) appropriately. Internal grievance forms will be made available in Kazakh, Russian and if required in English at key locations around Project area (through the community leaders of nearby communities, at the publicly accessible entrance of Almaty CHP -2) with a sealed and locked 'post box' available for submitting grievance at every location. The post box will be checked regularly.

External grievance forms will be made available in both Kazakh, Russian and if required in English at the site entrance of Almaty CHP-2. Sealed and locked 'grievance boxes' will be made available at the Project site entrance for grievance form submission. The process for recording, reviewing, following up and responding to will be the same as detailed above. All grievances during operations will be recorded for a minimum of 5-years, with records being kept on site.

Where external grievances are received by letters or email these will also be formally recorded and followed up appropriately by the designated representative. The contact details of the E&S Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed.

There will be worker representatives selected by workers at sites who will be involved in grievance management and in coordination with representatives from trade unions.

Workers can use GRM contact details provided in Table 6-2, to submit compliances, share feedback etc. Grievance Procedures for Women and Vulnerable and Disadvantaged Groups

The following procedures will be implemented to ensure GBVH cases are reported:

- Workers will be provided with information regarding worker code of conduct in local languages which will include provisions for reporting, investigations, termination and disciplinary action against those who perpetrate gender violence and harassment.
- Mandatory training and awareness raising will be conducted for the workforce on gender-based violence and harassment towards local community members and their colleagues especially women and the availability of a grievance mechanism to report any GBVH cases.
- The workers will be made aware of the laws and regulations that make sexual harassment and gender-based violence a punishable offence which is prosecuted.
- Ensure inclusion of a balanced representation of women on the HSE team and department of external communication which will be easily relatable and approachable to female workers.
- Develop tools for anonymous sexual harassment complaints by workers and host community members and protect the confidentiality of the complainants.
- The company will work in close coordination with the local authorities in investigating any complaints relating to gender violence and harassment in the host communities where it relates to Project workers.
- Develop a monitoring system to monitor GBVH activities to assess the effectiveness of the controls.

6.5.1 Reporting of Gender Based Violence and Harassment (GBVH)

Channels and tools for anonymous reporting of GBVH shall be developed in accordance with the potential gender risks identified in the ESIA Addendum Table 12-3. The reporting channels shall ensure safety and confidentiality to encourage reporting of such incidents. The reporting channels shall include complaint/feedback boxes, a toll-free telephone number, a designated community organisation (e.g., NGOs, etc.), service-user group or local women's organisation. Reporting channels shall include anonymous and child friendly options to encourage children and young people to come forward.

6.6 Grievance Mechanism Contact Details

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

Table 6-1 Contact details for GRM points of contact at project construction and operation stages

COMPANY	CONTACT DETAILS
KAZ ALES	Ombudsman - Erseitova Aliya Tel: 2540-331 Email: kancel@ales.kz In addition, GRMs can be submitted through GRMs boxes located at the checkpoint of CHP-2. Submitted GRMs are collected once in two week

6.7 Process Flow and Timeline

Table 6-2 Grievance Process and Timeline

STAGE	TIMELINE
Grievance is received/submitted	-
Grievance is logged and acknowledged	Within 7 working days of grievance being submitted
Grievance is investigated	Within 14 working days of grievance being submitted*
Proposed resolution conveyed to grievant	Within 14 working days of grievance being submitted
If applicable following dissatisfaction of resolution by Grievant	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 14 working days of notification of dissatisfaction by Grievant
In the event that a grievance cannot be resolved between the two parties a mediator will be involved i.e. local leaders who understand the culture and practices within the Project site.	Within 14 working days of notification of dissatisfaction by the Grievant.
Grievances that are not resolved at the project level - a grievance committee involving senior E&S personnel from the Project Company, community development officials from district akimats and any other relevant authorities (if required).	Within 30 working days of notification of dissatisfaction by the Grievant.

Note: Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

7 IMPLEMENTATION PLAN

In order for this SEP to function effectively, it is important to determine a management structure and assign suitable personnel for the implementation of the SEP commitments.

7.1 Roles and Responsibilities

Note: The roles below will need to be revised upon the finalisation of E&S staffing and titles under the EPC Contractor and Project Owner respective to construction and operations, and the allocation of specific roles and responsibilities within E&S teams.

The responsibilities of key staff with respect to the SEP are outlined below.

7.1.1 Community Liaison Lead (Project Owner)

NAME	TBD
CONTACT DETAILS	TBD

The Community Liaison Lead will be responsible for the following:

- Oversight of the SEP implementation in coordination with the EPC Contractor's team during construction.
- Overseeing and approving communications and engagement with external parties by the EPC Contractor during construction. Including the resolution of community grievances.
- Leading SEP implementation in full (including the responsibilities similar to those outlined for the HSE Manager and E&S Manager's below) during operations.

7.1.2 HSE Manager (EPC Contractor)

NAME	Iskakov Marat Dosimkhanovich
CONTACT DETAILS	almts@sepcol.com

The HSE Manager is responsible for:

- Ensuring stakeholders are recognised as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning; and

- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.

7.1.3 Environmental and Social Manager (EPC Contractor)

NAME	Akhmediyarov Askar Nurlanovich
CONTACT DETAILS	almts@sepco1.com

The EPC Contractor will employ/nominate the Environmental and Social Manager during the construction and commissioning phase. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP engagement program and ensuring that the Project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that Project personnel are well briefed in regard to the SEP and grievance mechanism (including security personnel), and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing, tracking and resolution of all grievances (in liaison with the Project Owner's team); and
- Undertaking monitoring and reporting processes stated in the SEP (below).

7.2 Monitoring and Reporting

7.2.1 Key Performance Indicators (KPIs)

The following Key Performance Indicators (KPIs) should be considered to evaluate the progress or successful implementation of the SEP. KPIs should be accounted on a monthly basis.

- Completion of all required SEP actions on time, as per the stated engagement programme.
- Grievance resolution in line with the stated timelines from receipt to closure.

7.2.2 Monitoring Parameters

- Cumulative number of grievances (per E&S aspect/ topic and affected district/ community) related to local community health, safety, security, social and environmental context (injuries, damage, diseases, etc.). This count will include both closed and pending grievances.
- Grievances that are pending/unresolved.
- Grievances from vulnerable PAPs that are pending/unresolved.

-
- Number of grievances not resolved in less than 1 month and 3 months.
 - Average time for grievance resolution.
 - Number of grievances received and resolved in regard to SEA, SH and GBV etc.

8 REVIEW

As stated herein, the SEP is a living document that will be utilised in the ESMS throughout the project's lifecycle as a reference document. As such, there is a need to update the SEP as necessary to include any relevant changes such as changes in projects circumstances, new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, changes of relevant personnel, changes to grievance mechanism, etc. There may also be a need to update the SEP and Grievance Mechanism as part of corrective actions linked to audit, or other findings.

As a minimum, the SEP will be reviewed on an annual basis, with the aim of achieving continual improvement.

APPENDIX A – SEP PREPARED FOR THE PROJECT IN 2022

APPENDIX B- EXAMPLE OF GRIEVANCE FORM

GRIEVANCE FORM	
INSTRUCTIONS	Please fill in this Grievance form in clear handwriting and submit through one of the following means: <ul style="list-style-type: none"> - Directly to Environmental & Social Manager - By email to: - Deposit in the letter box at the Project main entrance
Full Name	First Name:
	Last Name:
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> By Post: <i>Please provide mailing address:</i> <input type="checkbox"/> By telephone: <input type="checkbox"/> By email:
Preferred Language of Communication	<input type="checkbox"/> Kazakh <input type="checkbox"/> Russian <input type="checkbox"/> English
Description of Incident/Grievance	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date...) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature:	
Date:	

APPENDIX C - GRIEVANCE REGISTER TEMPLATE

ID	DATE	NAME OR GRIEVANT	CONTACT DETAILS	PREFERRED LANGUAGE	REQUESTED ANONYMITY?	DESCRIPTION OF THE PROBLEM	RESPONSIBLE PERSON	ACTIONS TO BE UNDERTAKEN	DUE DATE	RESULTS OF THE ACTIONS	CLOSING DATE	EVIDENCE (IF APPLICABLE)

APPENDIX D- PROJECT LEAFLET

APPENDIX E- PROJECT PRESENTATION