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Stakeholder Engagement Plan

Distribution Network Modernisation Programme of Karagandy Zharyk LLP in Karaganda Region,
Republic of Kazakhstan

Draft for adoption by KZh and disclosure

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LIST OF ABBREVIATIONS

Abbreviation	Transcript
AMR/AMI	Automated Meter Reading / Advanced Metering Infrastructure
CLO	Community Liaison Officer
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESR	Environmental and Social Requirement
GBVH	Gender-Based Violence and Harassment
GRM	Grievance Redress Mechanism
HR	Human Resources
IPAM	Independent Project Accountability Mechanism (EBRD)
KBA	Key Biodiversity Area
KSK	Property owners' cooperative (housing cooperative)
KUS	Kazakhstan Utility Systems LLP
KZh	Karagandy Zharyk LLP
kV	Kilovolt
LLP	Limited Liability Partnership
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
OHL	Overhead Power Line
OHS	Occupational Health and Safety
PR	Public Relations
RES	District electricity network unit
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan
SS	Substation

1. INTRODUCTION

The Distribution Network Modernisation Programme of Karagandy Zharyk LLP in Karaganda Region, Republic of Kazakhstan (the "Project") provides for the modernisation of the electricity network infrastructure of Karagandy Zharyk LLP ("KZh" or the "Company") in order to improve the reliability of power supply to consumers. The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") is considering providing financing to KZh for the Project. The financing is expected to support KZh's investment programme[1], which contributes to the National Project "Modernisation of the Energy and Utilities Sectors"[2].

KZh transmits and distributes electricity in Karaganda city and a large part of Karaganda Region and serves approximately 300,000 consumers. The Company belongs to the Kazakhstan Utility Systems (KUS) group and follows the corporate standards and requirements established by KUS, including those for environmental and social management.

This document is the Stakeholder Engagement Plan (the "SEP" or the "Plan") prepared for the Project. It describes how the public, in particular local communities, landholders and land users, and other stakeholders will be informed about the Project and given the opportunity to express their views and concerns and to contribute to its development, and how grievances will be received and resolved.

The SEP has been prepared on the basis of the environmental and social due diligence (ESDD) of the Project carried out for the EBRD by an independent consultant in September–October 2026, including a site visit to the Project facilities on 8–10 September 2026, and is consistent with the stakeholder engagement and grievance actions of the Project Environmental and Social Action Plan (ESAP).

The SEP is a "living" document. It will be updated as the Project progresses, in particular once design documentation, land requirements and construction schedules become available, taking into account the needs and characteristics of ongoing stakeholder engagement.

[1] KZh investment programmes are published on the Company's website: https://www.k-zharyk.kz/ru

[2] Approved by Resolution of the Government of the Republic of Kazakhstan No. 1102 of 25 December 2024: https://adilet.zan.kz/rus/docs/P2400001102

2. PROJECT DESCRIPTION

The Project involves the modernisation of KZh's electricity network infrastructure in Karaganda Region, aimed at improving the reliability of power supply to consumers and creating conditions for further socio-economic development of the region. It comprises six components, summarised in Table 1.

Table 1: Project components and indicative schedule

No.	Component	Scope and location	Indicative schedule
1	Reconstruction of the Proletarka SS – Karbyshevka SS section of the 110 kV GRES-2 – Karagayly OHL	Approximately 60 km (poles No. 481–740). Construction of a new single-circuit line parallel to the existing route, dismantling of the existing double-circuit line and installation of a second single-circuit line along the existing route.	Surveys and design: 2027–2028 (approximately 12 months); construction: approximately 24 months following completion of design.
2	Reconstruction of the Kurylis settlement – Proletarka SS section of the 110 kV GRES-2 – Karagayly OHL	Approximately 68.3 km (poles No. 205–481), including the tap to Kuznetskaya SS; same reconstruction concept as for Component 1.	Surveys and design: 2027–2028 (approximately 12 months); construction: approximately 24 months following completion of design.
3	Technical modernisation of three substations	Karkaralinsk 110/35/10 kV SS (Karkaralinsk town), Yaltinskaya 110/10 kV SS (Kulaigyr village, Abay District) and Ulyanovka-2 35/10 kV SS (Bukhar-Zhyrau District): replacement of power transformers, with an increase in installed capacity at Ulyanovka-2 and Karkaralinsk SS, and of associated equipment. Works will take place within the existing substation plots.	Design: 2027 (approximately 11 months for each transformer, including design, manufacturing, delivery, installation and commissioning).
4	Reconstruction of the electrical networks of Shakhtinsk	10 kV indoor switchgear at Gorodskaya and Semenovskaya SS (including AMR/AMI and SCADA systems); 0.4 kV and 10 kV cable and overhead lines (including AMR/AMI); 10/0.4 kV transformer substations (including AMR/AMI and SCADA); dispatch control board of the regional distribution network service.	Surveys and design: 2027–2028 (approximately 12 months); construction: approximately 42 months following completion of design.
5	Reconstruction of the electrical networks of Karaganda (Sortirovka)	Sortirovka area in the northern part of Karaganda city: replacement of 0.4 kV overhead lines (53.86 km) and 10 kV overhead lines (16.53 km) with self-supporting insulated wires (SIP), with sectioning of the 0.4 kV lines; replacement of 0.4 kV cable lines (11.1 km) and 10 kV cable lines (25.7 km); replacement of equipment at 42 10/0.4 kV transformer substations (or of the substations themselves with compact units where the building is in poor condition) and installation of new compact transformer substations; upgrade of AMR at substations and consumers; installation of control equipment and a dispatch control panel integrated with KZh's information network and SCADA.	Surveys and design: 2027–2028 (approximately 12 months); construction: approximately 42 months following completion of design.
6	Technical modernisation of the automated electricity	Replacement of 52,117 electricity meters and associated metering infrastructure in Karaganda city.	Design: 2027–2028 (approximately 12 months); construction: approximately 24 months

No.	Component	Scope and location	Indicative schedule
	metering system in Karaganda city		following completion of design.

The 110 kV GRES-2 – Karagayly double-circuit line was commissioned in 1963 and is the only source of power supply for Karkaralinsk District and the eastern part of Bukhar-Zhyrau District, with more than 36,000 residents. The adjoining eastern sections of the same line (poles No. 740–1146) are being reconstructed separately under the National Project and KZh's investment programme and are not part of the Project financed by the EBRD.

The Project will reduce the risk of accidents and prolonged interruptions of power supply associated with the high physical wear of substation equipment and power lines. Renewal of the infrastructure will improve the reliability of power supply to households, life-support facilities, medical and educational institutions, and industrial and agricultural enterprises of Karkaralinsk and Bukhar-Zhyrau districts and Shakhtinsk, and will allow additional capacity to be connected for new facilities in the region.

The Project is at an early stage and design documentation has not yet been developed. The route of the existing 110 kV line is known, and the new circuit will run parallel to it; the exact position of the new circuit, the pole locations, temporary access routes, land requirements, construction methods and schedules are not yet defined. The Company will start design and the selection of contractors after the EBRD financing is approved. According to the Company, about 43 workers will be engaged by the construction contractor(s) for the Project and housed in rented accommodation in local settlements; no worker camps are planned. This will be confirmed once the contractors are selected.

The substation works will take place within existing plots owned by KZh, and no permanent land acquisition is expected for the substation, Shakhtinsk and metering components. In the Sortirovka area of Karaganda, new compact transformer substations may require small plots of municipal land, to be allocated by the Karaganda city akimat; the sites will be selected to avoid land actually used by residents or businesses (e.g. parking, garages, kiosks, playgrounds) and to minimise tree removal. The new parallel circuit of the OHL will require land plots for new pole positions, as well as temporary access to land during construction and dismantling. No physical resettlement is expected.

Potential concerns of local communities and land users may relate mainly to the construction phase: temporary restrictions on land use and access, damage to crops and pasture, construction traffic, noise and dust (in particular in Shakhtinsk and the Sortirovka area of Karaganda), open excavations, planned power interruptions during switching and connection works, and the presence of the contractor workforce. During operation, they may relate to restrictions on land use within the OHL protection zone (20 m on either side of the line), vegetation clearance and tree pruning, and the risk of bird collision with the lines. For the metering component, consumers' concerns may relate to the schedule of meter replacement and access to premises, the readings of the replaced meters and the accuracy of bills after replacement, and the protection of consumer data; meter replacement and billing have been a recurring subject of consumer complaints in the past. The location of the Project facilities is shown in Figure 1.



Figure 1: Project location

3. PROJECT REQUIREMENTS

3.1 Requirements of the Legislation of the Republic of Kazakhstan on Public Participation and Information Disclosure

Under the Environmental Code of the Republic of Kazakhstan, the public has the right of access to environmental information (Article 18(1)). The Code also:

- establishes the right of citizens to participate in environmental assessment and in other procedures that provide for public participation (Article 15);
- sets out the stages and sequence of the environmental impact assessment procedure (Article 67);
- establishes the requirements for public hearings (Article 73).

KZh's existing facilities are classified as Category IV under the Environmental Code, for which screening of impacts, scoping and environmental impact assessment, and the associated public hearings, are not required. The reconstruction of the OHL may, however, be subject to screening of environmental impacts under the Environmental Code, the outcome of which will determine whether a national environmental impact assessment, including public hearings, is required. This will be confirmed once design documentation is available. If public hearings are required, they will be held in accordance with the Environmental Code, and this SEP will be updated accordingly.

Land for the new OHL circuit will be formalised through the procedures of the local executive bodies (akimats) under the Land Code of the Republic of Kazakhstan, which include public hearings organised by the akimat following an application for land. In addition, under the Law on the Protection and Use of Objects of Historical and Cultural Heritage, a historical and cultural expertise is required before land is developed.

The Law of the Republic of Kazakhstan No. 401-V of 16 November 2015 "On Access to Information"[3] defines environmental information as socially significant information, access to which may not be restricted (Article 6). Among other means of access, citizens have the right to submit a written request to the bodies holding the relevant information. Under Article 17-2, access to information for persons with disabilities is ensured, among other means, through the compliance of information holders' websites with the national web-content accessibility standard.

In addition to environmental matters, increases in electricity tariffs by natural monopolies are subject to public hearings under the legislation of the Republic of Kazakhstan. As investment costs of natural monopolies are recovered through regulated tariffs, the Project may be taken into account in future tariff applications. Public hearings on tariffs are organised by the Committee for the Regulation of Natural Monopolies of the Ministry of National Economy of the Republic of Kazakhstan, which publishes the date and place of the hearings in periodical print media 30 calendar days in advance; where a tariff is approved under the simplified procedure, hearings are held no later than ten calendar days before its approval. Natural monopolies are also required to report annually to consumers and other interested parties (Article 26 of the Law of the Republic of Kazakhstan No. 204-VI of 27 December 2018 "On Natural Monopolies"); KZh reports on the implementation of its approved tariff estimate and investment programme, for example, on 24 July 2026 the Company presented its report for the first half of 2026 at its office, with online participation via Facebook.

The legislation of the Republic of Kazakhstan does not require legal entities to establish project-level grievance mechanisms, to inform stakeholders about project progress or to respond to information requests at all project stages. However, the authority regulating natural monopolies holds receptions of consumers jointly with natural monopolies, including KZh, at least once a month (Article 8(34) of the Law "On Natural Monopolies"). Under the Rules for the Use of Electric Energy, consumers must be

[3] https://adilet.zan.kz/rus/docs/Z1500000401

notified of planned power interruptions for repair works and connection of new consumers at least three calendar days in advance.[4]

3.2 European Bank for Reconstruction and Development Requirements

The EBRD's environmental and social requirements apply in the context of the Bank's potential financing of the Project and establish good international practice for managing environmental and social risks and impacts. The Project has been categorised as Category B in accordance with the EBRD Environmental and Social Policy (2024)[5], which sets out specific requirements for stakeholder engagement in Environmental and Social Requirement (ESR) 10. The key requirements for stakeholder engagement throughout the Project lifecycle are outlined below:

- **Stakeholder identification and analysis.** Stakeholders must be identified and documented during engagement planning. Stakeholders include individuals or groups that are or may be affected by Project activities, as well as those who may have an interest in the Project. The Company must also identify vulnerable people or groups, who may require additional measures or support to participate effectively in the engagement process.
- **Information disclosure.** Where a project is associated with material environmental or social impacts over its lifecycle, the Company must disclose relevant Project information to stakeholders as it becomes available. Information should be timely, relevant, understandable, accessible and culturally appropriate, and provided in a manner that facilitates meaningful participation.
- **Stakeholder engagement planning.** Projects that may result in adverse environmental or social risks and impacts must be developed in consultation with affected communities. Engagement includes disclosure of Project risks and impacts, meaningful consultation and feedback to stakeholders on their concerns and expectations. The Company must prepare a SEP that defines engagement approaches and formats, disclose and discuss the SEP with stakeholders, implement it, and update it regularly in response to stakeholder feedback and/or changes to the Project.
- **Meaningful consultation.** The Company must undertake meaningful consultation with stakeholders throughout the Project lifecycle. Consultation must be based on prior disclosure and dissemination of information on the Project's environmental and social impacts, be documented by the Company, and allow stakeholders to express their views and concerns, which the Company must consider when developing mitigation measures and making Project-related decisions.
- **Grievance mechanism.** A grievance mechanism must provide for fair, objective, culturally appropriate and non-retaliatory consideration of concerns. It must be accessible to all stakeholders, including vulnerable people and groups, and must allow for the submission of anonymous grievances.
- **External stakeholder engagement procedure.** The procedure must be proportionate to the Project's risks and potential adverse impacts and include mechanisms for receiving, recording, assessing and responding to communications and concerns raised by Project stakeholders.
- **Monitoring of engagement effectiveness.** Stakeholder engagement must continue throughout the Project lifecycle. Where necessary, the confidentiality of stakeholders must be protected, and all forms of manipulation, interference, coercion, intimidation and retaliation must be prevented.

[4] Rules for the Use of Electric Energy approved by Order of the Minister of Energy of the Republic of Kazakhstan No. 143 of 25 February 2015, paragraph 53: https://adilet.zan.kz/rus/docs/V1500010403

[5] EBRD Environmental and Social Policy, 2024: https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2024.html

The Company must monitor the effectiveness of the stakeholder engagement process and of the grievance mechanism.

Engagement requirements are also included in other ESRs relevant to the Project: ESR 2 requires a grievance mechanism for workers, including contractor workers; ESR 4 requires that affected communities are informed of risks to community health, safety and security, including risks associated with the presence of the contractor workforce and the conduct of security personnel; and ESR 5 requires informed consultation and participation of affected landholders and land users in land acquisition, compensation and temporary land use processes.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Stakeholder Identification and Analysis

The purpose of stakeholder identification is to ensure comprehensive and meaningful engagement with different categories of stakeholders. Stakeholder identification is a continuous process and will continue throughout the various stages of Project implementation.

A systematic approach, based on the significance of the Project's potential impacts, is used to compile the stakeholder list. Preliminary stakeholder identification was undertaken at the initial stage of the Project (September 2026) through:

- review of publicly available information in the media, social media, websites of local authorities and other sources;
- review of KZh's existing stakeholder engagement practice and of its records of public appeals and complaints for 2024–2026;
- a site visit to the Project facilities on 8–10 September 2026 and interviews with KZh personnel.

Stakeholder identification was undertaken by an independent consultant engaged to carry out the environmental and social assessment of the Project in accordance with EBRD requirements. The preliminary stakeholder mapping was based on a review of available documentation and public sources, KZh's records of appeals for 2024–2026, the site visit and interviews with KZh personnel. Stakeholders were grouped according to the basis and stage of their identification:

- Confirmed stakeholders: groups identified based on KZh documents and interviews, including those associated with substation locations, consumer groups, public authorities and the security provider.
- Preliminarily identified stakeholders: groups identified by the Consultant based on the existing OHL alignment and public sources but not yet validated, including residents of settlements along the OHL route and informal pasture users. Their identification remains indicative due to the early stage of design.
- Stakeholders to be identified following design development: owners and users of individual plots required for tower placement and temporary access, and residents potentially affected by construction traffic.

Further updates and revisions of this SEP will be undertaken by KZh as the Project progresses. Once design documentation is available, KZh will identify owners and users of individual land plots and access routes, residents affected by construction traffic and other stakeholders requiring project-specific engagement; compile a register of affected landholders and land users along the OHL sections, including informal users of land; and maintain the stakeholder and affected land user registers throughout the Project.

Based on this analysis, a preliminary list of stakeholder groups has been prepared (Table 2). It describes their potential interests and concerns and the methods of engagement with them. This SEP distinguishes between two categories of stakeholders:

- **Primary stakeholders** – individuals or groups that are, or are likely to be, directly or indirectly affected by the Project (affected parties);
- **Secondary stakeholders** – individuals or groups that may have an interest in the Project but are not subject to its direct impacts.

Vulnerable groups. Some individuals and groups may be disproportionately affected by the Project or face barriers to participating in engagement and using the Project GRM. For this Project, they may include low-income households, single-parent families, elderly people and people with disabilities, including persons who depend on electrically powered medical equipment at home (who are particularly vulnerable to power interruptions and tariff changes), women-headed households, and

informal users of land, such as households grazing livestock on land held by rural district akimats without registered rights. Vulnerable stakeholders will be identified with the assistance of akimats and local social services and through the screening of affected land users. Engagement will be adapted to their needs, for example through visits to their homes, the use of intermediaries trusted by them, offline information channels and assistance in completing grievance forms.

Table 2: Key groups of stakeholders

Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
Local communities, including vulnerable groups				
Residents of settlements near the substations to be modernised: Karkaralinsk town (Karkaralinsk SS); Kulaigyr village, Abay District (Yaltinskaya SS); Botakara village, Bukhar-Zhyrau District (Ulyanovka-2 SS)	Substation locations and project scope are supported by Company documents and interviews. Specific exposure of nearby residents will be verified during design	Primary	■ Consultation meetings and notifications of construction schedules ■ Direct communication with residents of houses near the substations ■ Publications on the Company's website and social media ■ Printed notices at akimats ■ Information boards and warning signs at KZh facilities ■ Project GRM	■ Information on expected impacts and benefits ■ Timing of construction works and related power interruptions ■ Noise, dust and construction traffic ■ Safety at construction sites ■ Information on tariff changes ■ Access to the Project GRM
Residents of Shakhtinsk (reconstruction of the town's distribution networks and switchgear at Gorodskaya and Semenovskaya SS)	Shakhtinsk network reconstruction and the relevant substations are included in the Project scope.	Primary	■ Consultation meetings and notifications of construction schedules ■ Notices at building entrances and through housing cooperatives (KSK) ■ Publications on the Company's website and social media ■ Information boards at work sites ■ Project GRM	■ Works in streets and courtyards, temporary restrictions on access, open trenches and construction traffic ■ Planned power interruptions ■ Reinstatement of courtyards, roads and green areas ■ Tree pruning and removal ■ Access to the Project GRM
Residents of the Sortirovka area of Karaganda city (reconstruction of the area's distribution networks)	The component is included in the Project scope. Specific streets and residents affected will be identified during design.	Primary	■ Consultation meetings and notifications of construction schedules ■ Notices at building entrances and through housing cooperatives (KSK) ■ Publications on the Company's website and social media ■ Information boards at work sites ■ Project GRM	■ Works in streets and courtyards, temporary restrictions on access, open trenches and construction traffic ■ Planned power interruptions ■ Siting of new compact transformer substations ■ Tree pruning and removal along the overhead lines ■ Reinstatement of courtyards, roads and green areas ■ Access to the Project GRM
Residents of settlements along the OHL route: Karaganda city; Bukhar-	Preliminarily identified from the existing OHL	Primary	■ Consultation meetings organised with the akimats ■ Notifications of construction schedules	■ Information on the OHL route and the areas directly affected by the works

Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
Zhyrau District: Kurylis, Karakuduk, Togyzkuduk, Sheshenkara and Ashisu villages; Karkaralinsk District: Koktas and Matak villages	alignment and public sources		■ Publications on the Company's website and social media; printed notices at akimats ■ Information boards and warning signs ■ Project GRM	■ Timing of construction works and related power interruptions ■ Construction traffic and routes of heavy vehicles ■ Presence of contractor workers, worker conduct and community safety ■ Restrictions within the OHL protection zone ■ Access to the Project GRM
Groups vulnerable to power interruptions and tariff changes: low-income households, single-parent families, elderly people, people with disabilities, including persons dependent on electrically powered medical equipment at home	Consumer groups confirmed by records and interviews. Individual vulnerable households and their needs remain to be identified with akimats and local social services.	Primary	■ Targeted consultations through akimats and local social services ■ Direct communication, including home visits and telephone calls ■ Offline notices ■ Assistance with submitting grievances	■ Advance notice of power interruptions ■ Information on tariff changes and on targeted assistance[6] ■ Information on expected impacts and benefits ■ Accessible Project GRM
Residents, organisations and businesses that may be affected by construction traffic (to be identified in the construction traffic management plans)	To be identified after design, based on construction traffic routes and traffic management plans.	Primary	■ Information on the Company's website and printed notices at akimats ■ Direct communication where works affect access ■ Project GRM	■ Routes and schedules of construction vehicles ■ Road safety and damage to roads ■ Access to the Project GRM
Landholders and land users				
Owners, tenants and users of land plots crossed by the new and reconstructed OHL circuits or needed for temporary access, including agricultural enterprises and farms	To be identified during design and consultations with akimats	Primary	■ Individual consultations and negotiations ■ Written notification before land formalisation and before entry onto land ■ Agreements on permanent and temporary land use and compensation ■ Participation in akimat public hearings on land allocation	■ Information on the OHL route and pole locations and on the areas affected by construction ■ Procedure for land formalisation, compensation for permanent and temporary land use and crop damage ■ Restrictions within the OHL protection zone (20 m on either side of the line)

[6] Under the Law of the Republic of Kazakhstan No. 94-I of 16 April 1997 "On Housing Relations" (Article 97), low-income families (citizens) may apply for housing assistance to cover utility costs.

Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
			■ Entry/exit records and reinstatement sign-off ■ Project GRM (land-related category)	■ Timing of access, machinery routes and reinstatement of land ■ Access to the Project GRM
Informal land users, including households and farms grazing livestock on land held by rural district akimats without registered rights	To be identified during design, consultations with akimats and field verification	Primary	■ Identification through akimats and field verification; vulnerability screening ■ Individual consultations in the settlement, through rural district akims and trusted community members ■ Project GRM	■ Information on the timing and duration of works and on access to pasture ■ Compensation for losses due to temporary restrictions on land use ■ Access to the Project GRM
Owners and users of residential plots near the substations and urban networks, and landholders in OHL protection zones (maintenance and vegetation clearance)	Landholders in OHL protection zones are preliminarily identified from the existing alignment; individual plots and users will be verified during design.	Primary / Secondary	■ Direct communication; written requests for access or consent ■ Information on the Company's website ■ Warning signs at KZh facilities ■ Project GRM	■ Restrictions on land use within protection zones ■ Purpose, timing and scope of tree pruning and vegetation clearance ■ Access to the Project GRM
Electricity consumers				
Households and other consumers in Karaganda city whose electricity meters will be replaced under the metering component (52,117 meters)	The component is included in the Project scope. The specific consumers will be identified from the meter-replacement programme.	Primary	■ Advance notices to consumers, at building entrances and through housing cooperatives (KSK) ■ Publications on the Company's website and social media ■ Call centre ■ Project GRM	■ Schedule and procedure of meter replacement, including access to premises ■ Any costs to consumers ■ Final readings of the replaced meters and accuracy of bills after replacement ■ Protection of consumer data ■ Access to the Project GRM
Households and other consumers in Karaganda city whose electricity meters will be replaced under the metering component (52,117 meters)	The component is included in the Project scope. The specific consumers will be identified from the meter-replacement programme.	Primary	■ Advance notices to consumers, at building entrances and through housing cooperatives (KSK) ■ Publications on the Company's website and social media ■ Call centre ■ Project GRM	■ Schedule and procedure of meter replacement, including access to premises ■ Any costs to consumers ■ Final readings of the replaced meters and accuracy of bills after replacement ■ Protection of consumer data ■ Access to the Project GRM

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Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
Consumers – legal entities in the Project area: industrial, mining and agricultural enterprises and other organisations	Consumer groups and customer categories confirmed by records and interviews.	Primary	■ Direct notifications of planned interruptions in accordance with power supply contracts ■ Information on the Company's website and in the media	■ Information on expected impacts and benefits ■ Timing and duration of construction works and related power interruptions; alternative arrangements ■ Information on tariff changes
Socially important facilities and public institutions connected to KZh networks: hospitals and outpatient clinics, schools and kindergartens, water supply and heating facilities, care homes and other public institutions	Socially important consumer groups identified from records and interviews. Facility-specific exposure will be checked against work and power-interruption schedules.	Primary	■ Direct notification by district dispatch services and coordination of the timing of interruptions ■ Information on the Company's website and in the media	■ Timely information on the start and duration of works and related power interruptions ■ Back-up power arrangements during interruptions
State authorities				
National, regional and local authorities: Akimat of Karaganda Region; akimats of Karaganda city, Shakhtinsk town and Abay, Bukhar-Zhyrau and Karkaralinsk districts, and rural district akimats; Committee for the Regulation of Natural Monopolies; environmental, land, cultural heritage and emergency authorities	Authorities identified through records, interviews and existing permitting and coordination arrangements.	Secondary	■ Official letters, reports, telephone calls and e-mails ■ Meetings with representatives of the authorities ■ Permitting and land allocation procedures, public hearings	■ Compliance of Project activities with regulatory requirements ■ Land formalisation and public hearings ■ Coordination of power interruptions, traffic and emergency response ■ Reliable power supply and capacity for further development ■ Public safety and improvement of living conditions
Non-governmental organisations and civil society				
NGOs and members of the public interested in tariffs and consumer rights; local activists concerned with urban greenery	Consultant-identified from publicly available information	Secondary	■ Consultations and public hearings ■ Direct communication ■ Information on the Company's website and social media	■ Information on tariff changes and on the implementation of the investment programme ■ Purpose, timing and scope of tree pruning and vegetation clearance

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Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
Environmental and bird-protection organisations, such as the Association for the Conservation of Biodiversity of Kazakhstan (ACBK); administration of the Karkaraly State National Nature Park	Consultant-identified from publicly available information	Secondary	■ Direct communication ■ Sharing of biodiversity and avifauna assessment results ■ Information on the Company's website	■ Bird-safe design of the OHL and line marking ■ Saumalkol, Karasor and Balyktykol Lake KBAs and Karkaraly State National Nature Park ■ Results of post-construction bird mortality monitoring
NGOs working on women's rights and supporting vulnerable groups	Consultant-identified from publicly available information	Secondary	■ Direct communication ■ Involvement as intermediaries, at the request of complainants, in GBVH-related cases ■ Information on the Company's website	■ Prevention of and response to GBVH, including referral of survivors to support services ■ Information on how Project measures support gender equality
Local opinion leaders: rural district akims, community leaders, aksakals, informal leaders and influential social media users in the Project area	Indicative identification by the Consultant based on public sources and local context. Names and roles will be verified with rural akims and communities.	Secondary	■ Meetings and consultations ■ Direct communication ■ Engagement through social media	■ Access to timely and reliable information ■ Opportunity to convey the concerns and feedback of local residents to the Company
Internal stakeholders				
KZh management	Confirmed through Company organisational information and interviews.	Secondary	Internal communication	■ Decision-making on the Project ■ Terms and implications of Project implementation
KZh employees involved in the Project, including staff of the district electricity network units (RES)	Employee group confirmed through internal documentation and interviews.	Primary	■ Internal communication channels, including line managers, the HR department, senior management and the trade union ■ Worker grievance mechanism	■ Information on the Company's performance and the Project schedule ■ Occupational health and safety ■ Access to the worker grievance mechanism
Contractors and supply chain				

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OFFICIAL USE

Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
Design and construction (EPC) contractors, subcontractors and suppliers	Specific EPC contractors, subcontractors and suppliers have not yet been selected; they will be identified following procurement.	Primary / Secondary	■ Procurement and tender procedures ■ Environmental and social requirements in tender documents and contracts ■ Meetings, inspections and monitoring	■ Participation in Project implementation ■ Quality of services provided ■ Compliance with the Project and EBRD environmental and social requirements
Workers of contractors and subcontractors (about 43 workers expected)	Indicative workforce estimate. The actual contractor workforce will be confirmed after contractor selection.	Primary	■ Induction and regular briefings ■ Notice boards at construction sites and worker accommodation ■ Engagement during inspections, including confidential worker interviews ■ Worker grievance mechanism	■ Occupational health and safety ■ Fair terms of employment and working conditions; accommodation standards ■ Code of conduct, including prevention of GBVH ■ Information on the duration of employment and on demobilisation at the end of works ■ Access to the worker grievance mechanism
Supply-chain workers	Indicative stakeholder group; relevant suppliers and supply-chain workers will be identified following procurement.	Secondary	Project GRM, through suppliers	Access to the Project GRM
Security provider (Kokzhal Analytics LLP) and guards at KZh facilities	Confirmed through records and interviews	Secondary	■ Contractual requirements ■ Training and briefings	■ Code of conduct, respect for human rights and proportionate use of force ■ Interaction with communities and handling of complaints about security personnel
Media and lenders				
Print media at regional, district and municipal levels; television; online media and social media	Consultant-identified from publicly available media sources	Secondary	■ Official press releases, letters, telephone calls or e-mails ■ Press conferences ■ Publications and announcements on social media	Access to information on the progress and implications of the Project

OFFICIAL USE

Stakeholders	The basis of identification	Category	Communication methods	Interests / rationale for engagement
EBRD	Confirmed as the potential Project lender	Secondary	■ Direct communication and reporting ■ Engagement with the involvement of an independent environmental and social consultant	■ Provision of financing for the Project ■ Compliance with EBRD environmental, social and technical requirements

4.2 Current Stakeholder Engagement by KZh

As of September 2026, the Project was at an early stage, and KZh had not yet consulted stakeholders on the Project. In the course of its operations, the Company has established channels of communication with consumers, local authorities and other stakeholders, which provide a basis for engagement on the Project. They are described below.

Engagement with the Media and Publication of Information on the Website and Social Media

The Company regularly publishes information on its financial results, the implementation of its investment programmes and its social activities and initiatives through local media. An annual media plan is prepared, combining the Company's own plan with that issued by KUS, and includes publications on construction, reconstruction and modernisation works.

The Company's website[7] contains information on its current activities and investment programmes, as well as "News" and "Tariffs" sections for consumers and other stakeholders. The Company also publishes similar information on its social media pages (Instagram and Facebook), which are also used to receive feedback from stakeholders. These communications inform the public about current and planned activities and improvements in the quality and safety of services and ensure transparency regarding the Company's role in the energy sector.

Handling of Enquiries and Complaints

KZh operates a 24-hour, 7-days-a-week call centre with a single number (+7 (7212) 50-60-70); calls are recorded, and the service is generally staffed to provide communication in Kazakh and Russian on each shift. Contact numbers for appeals by category of applicant and by district are also published on the Company's website. Other channels include the online reception on the website, e-mail (*zharyk@kzharyk.kz*), written appeals submitted to the Company's office at *57/3 Mukanova Street, Karaganda*, and the Company's social media pages. Weekly public receptions are held on Fridays by the General Director or deputies, beginning with an online session on Facebook followed by an in-person reception at the Company's office. Appeals are also received through the city's unified coordination centre "Senim 109".

Written appeals are registered by the Company's chancellery and assigned to the responsible department, and applicants receive a written response within 15–30 calendar days, depending on the nature of the appeal and the need for additional information or a site inspection. The Company registered 174 written appeals in 2024, 121 in 2025 and 61 in January–June 2026. They mainly concerned the technical condition of networks and power interruptions, meter readings and billing, the conduct of Company staff and tariffs; individual appeals also concerned tree pruning in OHL protection zones, lines and poles on private land, and restoration of areas after Company works.

The existing system is designed primarily for routine service requests. It does not specifically address construction-related concerns, such as temporary access restrictions, damage to crops, construction traffic, worker conduct or land reinstatement, and does not allow fully confidential handling of complaints about staff conduct. A Project GRM is therefore proposed in this SEP (Section 6), to be adopted by KZh.

[7] Karagandy Zharyk LLP official website: https://www.k-zharyk.kz/ru

Informing Consumers about Planned and Emergency Power Interruptions

In accordance with national legislation, the Company notifies consumers of planned power interruptions at least three days in advance. Notifications are published on the Company's Instagram pages, including the dedicated page *@otklyucheniya_krg_zharyk* (approximately 22,000 followers), and are disseminated through WhatsApp and Telegram groups that include the akimats of city districts and settlements, and through direct coordination with housing cooperatives and management companies (KSK). District dispatch services separately notify hospitals, schools and other socially important facilities of planned interruptions.

During emergency (unplanned) interruptions, the restoration time cannot generally be predicted in advance, and the Company prioritises rapid restoration of supply. Information on larger incidents is provided to the public through social media, the call centre and the chats with akimats as soon as it becomes available; in exceptional cases, a television news ticker has been used. No dedicated channel, such as printed notices, is currently used for residents without internet access. For Project-related interruptions, additional offline channels are provided for in this SEP (Section 5.2).

Public Hearings

The Company holds public hearings where national legislation requires them, including for projects subject to environmental impact assessment and for proposed tariff increases. Public hearings also form part of the akimat land allocation procedure; notice is published in the established manner, and hearings are usually held at the akimat. In a recent example (the Novy Maikuduk sub-project), online participation was also possible.

Hearings allow local communities and other stakeholders to raise concerns, ask questions and receive information on potential impacts and mitigation measures. Their results are recorded and, where possible, taken into account in project development and management decisions. The Company has noted increasing participation of the public and activists in hearings, most often concerning tree pruning and removal in OHL protection zones.

Informing Stakeholders about Construction Works

The Company informs residents and users of areas adjacent to construction sites in advance of planned construction works, including their expected duration and any temporary restrictions on access to or use of the affected areas. Where construction works (for example, relocation of cable lines) may temporarily restrict access to private residential or commercial premises, the Company engages with the affected parties in advance to agree on the timing of the works and on alternative access arrangements.

Engagement with Landholders and Land Users

For new power lines, the Company identifies affected parcels and landholders from the public cadastral map and cadastral records and negotiates directly with landholders; where agreement cannot be reached, the route or pole location is adjusted. Before land formalisation, the Company usually sends official letters to affected land users about the planned construction. Temporary use of land during construction (access routes, machinery movement, work areas) is agreed by the contractor directly with the land user shortly before works begin, including the duration of works, any crop damage and the terms of compensation. For maintenance and vegetation clearance in OHL protection zones, KZh requests access or consent from landholders by official letter.

For the Project, engagement with individual land users along the new OHL circuit had not yet begun at the time of preparation of this SEP. This SEP provides for a consistent approach to the identification of, consultation with and grievance handling for affected landholders and land users (Sections 5.2 and 6).

Electrical Safety Awareness

The Company conducts electrical-safety awareness activities for children, including sessions for school and kindergarten pupils and visits to schools and children's camps. These activities will be extended to settlements located close to Project construction sites (Section 5.2).

5. STAKEHOLDER ENGAGEMENT PLAN

5.1 Information Designated for Disclosure and Locations

The package of environmental and social documents prepared in accordance with EBRD requirements will be disclosed in English, Kazakh and Russian and will comprise:

- Non-Technical Summary (NTS);
- Stakeholder Engagement Plan (SEP), including the Project GRM procedure and grievance form.

The documents will be available on the Company's website and in hard copy at the Company's office (57/3 Mukanova Street, Karaganda) and at the akimats of:

- Karaganda city;
- Shakhtinsk town;
- Karkaralinsk town (Karkaralinsk District);
- Abay District: Kulaigyr village;
- Bukhar-Zhyrau District: Botakara, Kurylis, Karakuduk, Togyzkuduk, Sheshenkara and Ashisu villages;
- Karkaralinsk District: Koktas and Matak villages;
- other rural districts in which land plots for the new OHL circuit are located, once identified.

The NTS and the current version of the SEP will remain available on the Company's website throughout the Project lifecycle. Hard copies will be available at the akimats during the disclosure period (30 days) and no later than two weeks before the start of public consultations. Notices of disclosure will be published in Kazakh and Russian on the Company's website and social media, on akimat notice boards and in local media.

As the Project progresses, the Company will also disclose: the results of environmental impact screening and, if required, environmental impact assessment materials; information on land requirements and on the procedure for land formalisation, compensation and temporary land use; construction schedules, traffic arrangements and planned power interruptions; information on the contractor workforce and the code of conduct; and annual reports on the implementation of this SEP.

5.2 Stakeholder Engagement and Information Disclosure Programme

This SEP sets out a preliminary programme of stakeholder engagement and Project information disclosure for all stages of the Project. The programme (Table 3) is based on the information available at this early stage and will be refined and detailed for each stage of the Project; updated versions will be disclosed to stakeholders.

To make engagement accessible and inclusive, the Company will:

- provide information and hold meetings in Kazakh and Russian, using non-technical language;
- hold meetings in each affected settlement at times and venues convenient for residents, in cooperation with the akimats, and announce them at least two weeks in advance;
- complement online channels with offline channels for residents without internet access: printed notices at akimats, shops, medical posts and building entrances, announcements through rural district akims and housing cooperatives, and direct telephone calls or visits where needed;
- facilitate the participation of women, elderly people, people with disabilities and other vulnerable groups, including, where appropriate, separate meetings or home visits;

- record all meetings (minutes, attendance lists disaggregated by gender, questions raised and responses) and report back to stakeholders on how their comments have been taken into account.

STAKEHOLDER ENGAGEMENT PLAN

Table 3: Stakeholder engagement action plan

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
All stakeholders				
All stakeholders	Disclosure of the E&S documents and notification of stakeholders of their publication and of planned consultations: ■ announcements on the Company's website and social media; ■ dissemination of information and hard copies through the akimats of the Project settlements (notice boards); ■ announcements in local media.	■ NTS ■ SEP, including the GRM procedure and grievance form (English, Kazakh and Russian)	■ Before EBRD Board consideration ■ Available on the website throughout the Project	PR Department; Social Manager / CLO
	Public hearings on environmental impact assessment materials in accordance with the Environmental Code, if required by the screening	Screening conclusion; EIA materials; minutes of hearings	■ During design, before submission of EIA materials for state expertise ■ Minutes published after the hearings	KZh; design contractor
	Publication of an annual report on SEP implementation and grievance statistics	Annual SEP report	Annually	Social Manager / CLO
Local communities, including vulnerable groups				
Residents of the Project settlements (Karkaralinsk, Kulaigyr, Botakara, Shakhtinsk, Karaganda (including the Sortirovka area), Kurylis, Karakuduk, Togyzkuduk, Sheshenkara, Ashisu, Koktas, Matak)	■ Consultation meetings in each affected settlement, organised with the akimats and local leaders, to discuss the Project, its schedule, potential impacts and mitigation measures, the contractor workforce and	■ NTS, SEP ■ Project schedule and design-stage information (routes, work areas)	■ During design, before land formalisation ■ Again before the start of construction of each sub-project	Social Manager / CLO, with the design / EPC contractor

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
	employment opportunities, and the GRM ■ Separate meetings or home visits for women and vulnerable groups where needed ■ Minutes and gender-disaggregated attendance lists	■ Code of conduct for contractor workers ■ GRM procedure ■ Minutes of meetings	■ Meetings announced at least two weeks in advance	
	■ Information boards at each construction site (nature and duration of works, responsible persons, contacts, GRM) ■ Notices at akimat notice boards and, in Shakhtinsk and the Sortirovka area of Karaganda, at building entrances and through housing cooperatives (KSK) ■ Publications on social media	■ Schedule of works ■ Temporary access restrictions and traffic arrangements ■ Contacts and GRM	At least one week before the start of works at each site; updated as works progress	EPC contractor; Social Manager / CLO
	■ Notification of planned power interruptions related to Project works through Instagram, the Company's website and WhatsApp/Telegram chats with akimats and KSK ■ Offline notification: printed notices at akimats and building entrances, announcements through rural district akims, and direct contact with households known to depend on electrically powered medical equipment (identified with the akimats and social services)	Schedule and expected duration of power interruptions	At least three days before the interruption	PR Department; RES dispatch services
	Information on emergency power interruptions during Project works through the call centre, social media and chats with akimats; direct	Cause of the interruption and expected restoration time, where known	As soon as information is available	RES dispatch services; PR Department

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
	notification of akimats and socially important facilities of prolonged interruptions			
	■ Electrical and construction-site safety awareness sessions at schools in settlements close to construction sites ■ Warning signs and fencing at excavations and work areas	Safety information	Before and during construction	KZh; EPC contractor
	Publication of information on the GRM on the Company's website, on posters at construction sites and akimats, and in leaflets distributed at consultation meetings	GRM procedure; grievance form	Before EBRD Board consideration (procedure disclosed); GRM operational before the first disbursement; refreshed before the start of construction and maintained thereafter	Social Manager / CLO; GRM Manager
Residents, organisations and businesses along construction traffic routes	Meetings with residents and small businesses located near construction sites and along traffic routes on the schedule of works, access arrangements, road safety measures and the GRM	■ Construction traffic management plan (routes and schedules) ■ Information on restrictions on access to construction sites	Before the start of construction	EPC contractor; Social Manager / CLO
Landholders and land users				
Landholders and land users along the OHL sections, including informal users	Identification of affected landholders and land users, including informal users of akimat-held pasture, through cadastral data, the akimats and field verification; vulnerability screening; compilation of the register of affected land users	—	During design, before land formalisation	KZh Capital Construction Department; Social Manager / CLO

Stakeholders		Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
	■ Individual consultations with each affected landholder and land user on the route and pole locations, possible adjustments, compensation for permanent and temporary land use and crop damage, and restrictions within the protection zone; written agreements ■ Direct notification of the akimat public hearings on land allocation, in addition to the official notice ■ Information and consultation of women in affected households, including separate meetings where needed	■ Individual consultations with each affected landholder and land user on the route and pole locations, possible adjustments, compensation for permanent and temporary land use and crop damage, and restrictions within the protection zone; written agreements ■ Direct notification of the akimat public hearings on land allocation, in addition to the official notice ■ Information and consultation of women in affected households, including separate meetings where needed	■ Land acquisition, compensation and temporary land use procedure ■ Information on the land-related GRM category	Before land formalisation and before any entry onto land	KZh Capital Construction Department; Social Manager / CLO
		Notification of the contractor's schedule before entry onto land (dates, duration, machinery routes); joint entry and exit records; verification of reinstatement	■ Schedule of works on the land plot ■ Entry/exit form	At least two weeks before entry; on completion of works and of reinstatement	EPC contractor; KZh
		Meetings with land users whose plots are located in the protection zones of Project facilities to explain safety and maintenance requirements and restrictions on land use	Safety and maintenance requirements and restrictions for land users	Before the start of construction and before commissioning	KZh; RES
Electricity consumers					
Consumers whose meters will be replaced		Advance notice of meter replacement through notices at building entrances, housing cooperatives (KSK), the Company's website and social media Recording of the final readings of the old meter together with the consumer, with a copy provided to the consumer	Schedule and procedure of replacement; information on any costs to consumers Record of final readings	At least two weeks before replacement in each building or street At replacement and during the first billing periods after replacement	KZh Sales Service; PR Department (call centre); GRM Manager

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
	Explanation of how metering data are used and protected Handling of questions and complaints about readings and bills through the call centre and the Project GRM	Data-protection information GRM procedure		
Consumers whose meters will be replaced	Advance notice of meter replacement through notices at building entrances, housing cooperatives (KSK), the Company's website and social media Recording of the final readings of the old meter together with the consumer, with a copy provided to the consumer Explanation of how metering data are used and protected Handling of questions and complaints about readings and bills through the call centre and the Project GRM	Schedule and procedure of replacement; information on any costs to consumers Record of final readings Data-protection information GRM procedure	At least two weeks before replacement in each building or street At replacement and during the first billing periods after replacement	KZh Sales Service; PR Department (call centre); GRM Manager
Consumers – legal entities	Coordination of the schedule of power interruptions through direct communication	Project schedule; schedule of power interruptions	In advance, in accordance with power supply contracts	RES dispatch services
Socially important facilities and public institutions	Direct notification of planned interruptions, coordination of their timing and confirmation of back-up power arrangements; avoidance of interruptions at critical times where possible	Schedule and duration of power interruptions	At least three days before the interruption, or as provided in power supply contracts	RES dispatch services
State authorities				
State and regulatory authorities	Engagement with the authorities, including: ■ obtaining permits and approvals, land allocation and historical and cultural expertise; ■ informing the authorities of changes to the Project;	Information on compliance with national legislation; Project information required by permitting procedures	In accordance with the design, construction and commissioning schedule and permitting procedures	KZh

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
	■ coordination of power interruptions, traffic arrangements and emergency response, including joint exercises for major outages.			
Non-governmental organisations and civil society				
NGOs and the public interested in tariffs and urban greenery	■ Publication of information on the Project and the investment programme on the Company's website ■ Consultations before tariff increases, as part of the statutory hearings ■ Advance information on the purpose, timing and scope of tree pruning and vegetation clearance	■ Investment programme; tariff information ■ Schedule and scope of vegetation clearance	■ In accordance with the tariff hearing schedule ■ Before vegetation clearance works	PR Department
Environmental and bird-protection organisations	■ Sharing of the results of the biodiversity and avifauna assessment and of the proposed bird-safe design measures, with an invitation to comment ■ Sharing of the results of bird mortality monitoring	■ Summary of the avifauna assessment and bird-protection measures ■ Monitoring results	■ After preparing the preliminary assessment results and before the completion of the design phase ■ Annually after commissioning	KZh environmental specialist; Social Manager / CLO
NGOs working on women's rights	■ Identification of available GBVH support services and agreement on referral arrangements ■ Involvement as mediators or support providers in GBVH-related grievances, at the request of complainants	GRM procedure	■ Before the start of construction ■ As needed	GBVH focal point
Internal stakeholders, contractors and their workers				

Stakeholders	Engagement activities	Information to be disclosed	Timing / frequency	Responsibility
KZh personnel	Informing employees about the Project, the GRM and the worker grievance mechanism	GRM and worker grievance mechanism procedures; minutes of meetings	Before the first disbursement, then quarterly	HR Department; Social Manager / CLO
Contractor personnel	■ Induction and briefings on the worker grievance mechanism, the code of conduct (including GBVH), OHS and community safety rules, terms of employment and arrangements at the end of employment ■ Summary information on notice boards at construction sites and worker accommodation	Worker grievance mechanism procedure; code of conduct	At mobilisation, before the start of works, then monthly	EPC contractor; KZh
Security personnel	Briefings on the code of conduct, human rights, proportionate use of force and interaction with communities	Security requirements	Before deployment at Project sites, then annually	KZh; security provider
Contractors and supply chain	Publication of procurement and tender information on the Company's website; environmental and social requirements in tender documents	Procurement procedures; Project procurement schedule	In accordance with procurement procedures and schedule	KZh Procurement Department
Media and lenders				
Media	Press releases on key Project milestones	Information on Project progress	At key milestones (financing, start of construction, commissioning)	PR Department
EBRD	Reporting on Project implementation and environmental and social performance, including SEP implementation and grievances	Annual environmental and social report	Annually; significant grievances and serious incidents – as required by the financing agreement	KZh

6. GRIEVANCE REDRESS MECHANISM

6.1 Purpose and Principles

The purpose of the Project Grievance Redress Mechanism (GRM) is to receive, assess and resolve concerns and grievances of stakeholders related to Project activities. The GRM is available to all external stakeholders, including local communities, landholders and land users, consumers and other members of the public, and is free of charge. It covers, among others, the following categories of grievances: land, temporary land use and compensation; construction impacts (noise, dust, traffic, access restrictions, damage to property and crops, reinstatement); community health and safety; Project-related power interruptions; meter readings and bills related to the replacement of meters under the Project; conduct of Company, contractor and security personnel, including GBVH; vegetation clearance and biodiversity; and other issues. The GRM will be implemented in accordance with the following key principles and EBRD requirements:

- designation of a responsible person (GRM Manager), team or unit to coordinate the resolution of grievances;
- defined timeframes for acknowledging receipt of grievances and for their resolution;
- practical arrangements and adequate resources to ensure confidentiality and to receive, consider and resolve grievances;
- publicly available information on the existence of, and access to, the GRM through the Company's website, printed Project information materials, information boards at construction sites and Company representatives.[8]

In accordance with international good practice, the GRM will observe the principles of accessibility, anonymity, non-retaliation, confidentiality and sensitivity in addressing cases of gender-based violence and harassment (GBVH). The GRM described in this section addresses all types of grievances, including GBVH-related grievances, and allows grievances to be submitted anonymously. Use of the GRM does not prevent complainants from seeking judicial or administrative remedies.

To ensure a safe and appropriate response to such sensitive matters, KZh will designate a suitably trained female staff member as GBVH focal point. She will be responsible for liaising with complainants on GBVH issues and for ensuring that such grievances are received and addressed in a safe, confidential and survivor-centred manner.

All GBVH-related grievances will be handled with strict confidentiality. Complainants' identities will be protected, and retaliation will not be tolerated. Where necessary, and with the consent of the survivor, GBVH cases will be referred to qualified service providers, including NGOs working to protect women's rights, lawyers, psychosocial workers and child-protection specialists. Such cases will be handled only by trained staff, and serious incidents may be referred to the relevant national authorities. This approach reinforces the Company's commitment to a safe, inclusive and respectful environment for all stakeholders.

The GRM procedure and grievance form will be disclosed with this SEP before the EBRD Board considers the Project, and the GRM will be operational before the first disbursement of the EBRD financing. The land-related category will be operational before any engagement with land users on land formalisation, and the categories for construction works and the integration of contractors' complaint handling will be in place before the start of construction.

[8] Grievance management, guidance note, EBRD, 2012.

6.2 Submission of Grievances

Stakeholders may submit grievances and enquiries through the following channels:

- in person: at the reception of the Company's office (57/3 Mukanova Street, Karaganda), during the weekly public receptions, and during meetings with Company representatives, including the Social Manager / Community Liaison Officer, who will record and follow up all grievances received from residents during consultations;
- by telephone: through the KZh call centre (24/7), +7 (7212) 50-60-70, or the contact numbers for appeals by district published on the Company's website; or by calling the Social Manager / Community Liaison Officer or the GBVH focal point (Table 4);
- online: through the online reception on the KZh website[9] or by e-mail to *zharyk@kzharyk.kz*;
- in writing: by post or by hand to *57/3 Mukanova Street, Karaganda, 100008*, using the grievance form in Annex 1 or a free-form letter; grievance forms will also be available at the akimats listed in Section 5.1 and at construction sites; Completed forms may be submitted directly to KZh representatives or deposited, including anonymously, in grievance boxes located at the Company's office, participating akimats and active construction sites;
- through intermediaries: akimats and rural district akims, community leaders, housing cooperatives, local NGOs, including NGOs supporting women's rights, and the contractor's community liaison staff.

Grievances related to construction works that are received by contractors will be registered and transferred to the KZh GRM Manager within one working day and recorded in the Project grievance register. Contractors will not close grievances without the agreement of KZh.

Anonymous and confidential grievances will be considered. Where a grievance is submitted by telephone or through an intermediary, the complainant will be consulted on the preferred channel for communicating the outcome. A sample grievance form, which may be used to submit a grievance, is provided in Annex 1. These options are intended to make the GRM accessible, inclusive and easy to use for all community members, including vulnerable groups.

6.3 Registration and Acknowledgement

The GRM Manager will ensure that all grievances and enquiries received through any channel related to the Project are entered in the Project grievance register (Annex 2), with a category assigned in accordance with Section 6.1, and that all complainants who have provided contact details receive acknowledgement of receipt. Within three days of receipt, the complainant will be sent a notification stating the grievance identification number and the expected timeframe for a response.

Where a grievance concerns an accident, an unsafe condition or another issue related to community safety (for example, a damaged conductor, an open electrical installation or an unfenced excavation), it will be transferred immediately to the dispatch service and the responsible personnel, and acknowledgement will be provided on the same day. The GRM process is shown in Figure 2.

6.4 Investigation and Response

Grievances will be referred to the relevant department or contractor for investigation, which may include a site visit and a meeting with the complainant. Where sensitive issues are raised, including

[9] Online reception: https://www.k-zharyk.kz/ru

those related to GBVH, the GBVH focal point will ensure that each case is handled sensitively and confidentially.

All grievances, except those concerning accidents and safety, will be reviewed and responded to within 15 calendar days of receipt. If additional time is needed, the complainant will be informed in writing of the reasons and of the expected date of the response; the extension will not exceed a further 15 calendar days. Grievances concerning circumstances that may result in accidents or other safety issues will be addressed as soon as possible.

The decision on a grievance will be communicated to the complainant in writing or orally, depending on the format chosen by the complainant; in all cases, the Company will record the decision in the grievance register. Responses to anonymous grievances will be communicated through agreed channels or, where appropriate, posted on notice boards at the local akimats or on the Company's website.

6.5 Resolution, Appeal and Closure

Where a grievance is substantiated, the complainant will be offered a resolution and a timeframe for its implementation and invited to sign a statement confirming agreement with the proposed resolution. If the complainant is dissatisfied with the proposed resolution, further consultations may be held with the involvement of a mediator or independent experts until an agreement is reached. If the complainant remains dissatisfied, they may refer the matter to external dispute-resolution mechanisms, including the courts.

A grievance will be considered closed when a resolution satisfactory to both parties has been reached and implemented, or when the case has been referred to a court. The register will record the outcome of each grievance and the date of closure.

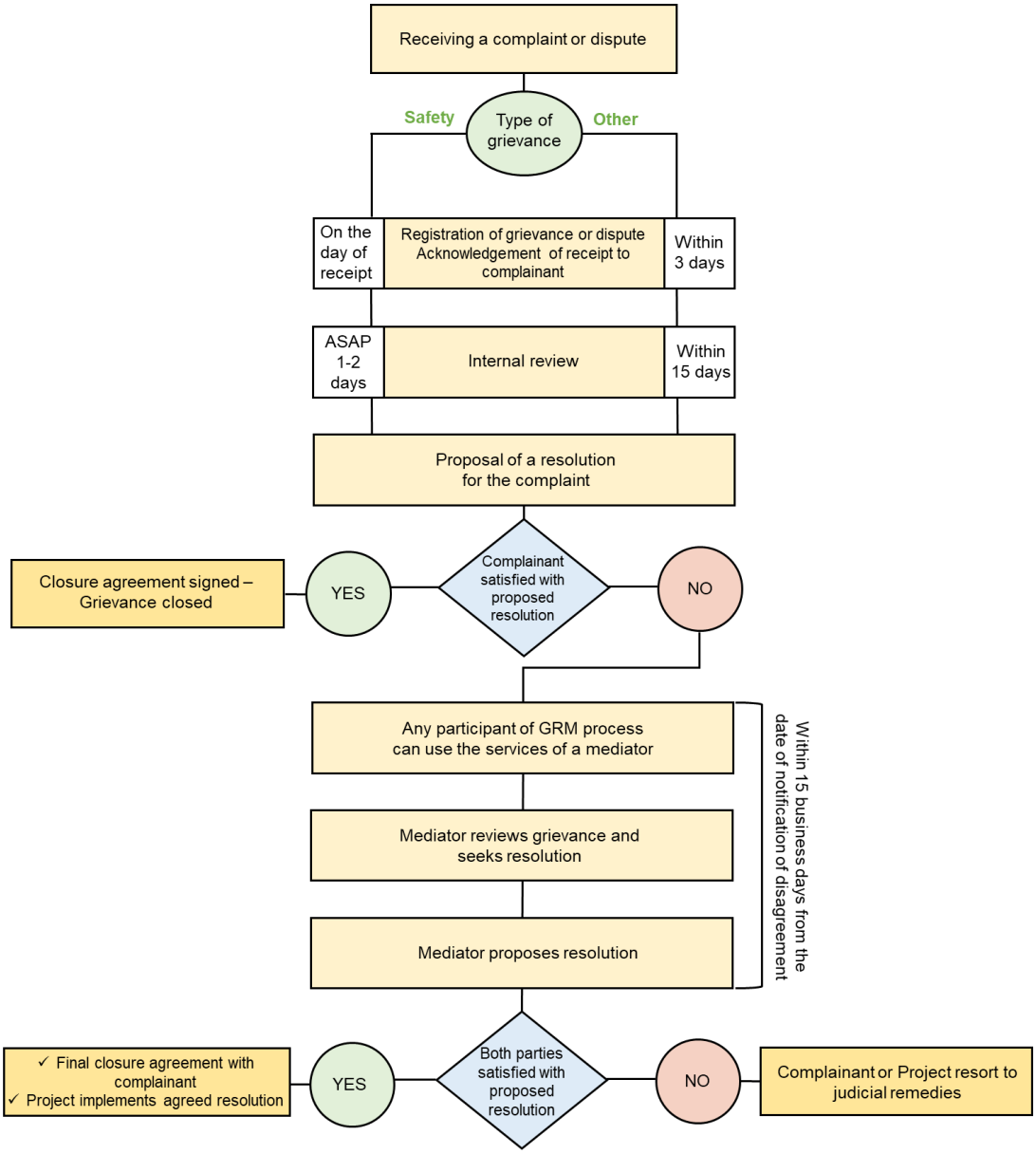


Figure 2: Grievance Redress Mechanism (GRM) process flowchart

Stakeholders may also submit a complaint to the EBRD's Independent Project Accountability Mechanism (IPAM), which reviews complaints from individuals and organisations concerning EBRD-financed projects that are believed to have caused, or are likely to cause, harm.[10]

6.6 Grievance Mechanism for Workers

In accordance with ESR 2, KZh will introduce, before the first disbursement, a separate, confidential grievance mechanism for its employees, which will also be accessible to contractor workers, allowing anonymous submissions and providing protection from retaliation. Contractors will be required to establish their own worker grievance mechanisms, to inform workers about them and about the KZh

[10] https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/submit-a-complaint.html

mechanism at induction and on notice boards at construction sites and worker accommodation, and to report worker grievances to KZh. Workers may also use the Project GRM described above.

7. PLAN IMPLEMENTATION, MONITORING AND REPORTING

To ensure the effective implementation of this Plan, it is important to designate personnel with the necessary competencies to implement and manage it and to allocate adequate resources.

7.1 Roles and Responsibilities

The Company has overall responsibility for Project implementation and compliance with the applicable environmental and social requirements. During Project preparation and disclosure, stakeholder engagement activities, information disclosure and external communications will be coordinated by the Public Relations Department.

The Head of the Chancellery will act as Grievance Mechanism (GRM) Manager and will ensure the registration, tracking and timely processing of grievances. Technical specialists and relevant operational departments will support stakeholder engagement activities, consultations and responses to Project-related enquiries as required. Prior to commencement of construction works, KZh will designate personnel responsible for day-to-day implementation of the SEP and community liaison functions. Construction contractors will designate community liaison staff and implement the stakeholder engagement and grievance-handling obligations set out in their contracts.

The contact persons listed below (Table 4) will be responsible for receiving and coordinating responses to Project-related enquiries and grievances in accordance with national legislation and the EBRD Environmental and Social Policy. Prior to construction, the list will be updated, as necessary, to include any additional staff designated for stakeholder engagement and community liaison functions, as well as contractors' community liaison representatives. The roles and responsibilities for SEP implementation are summarised in Table 5.

Table 4: Contact information

Full name	Position / role	Address	Telephone	E-mail
Assem Kazybayeva	Head of Chancellery / Community Liaison Officer / GRM Manager	57/3 Mukanova Street, Karaganda	+7 (7212) 983-598	Kanc-Head@kzharyk.kz
Anastasiya Zhunuspekova	Head of Human Resources Department / Social Manager / GBVH Focal Point	57/3 Mukanova Street, Karaganda	+7 (7212) 983-533	otr@kzharyk.kz
Marina Galyas	Public Relations Specialist	57/3 Mukanova Street, Karaganda	+7 (7212) 50-60-70; +7 (7212) 40-50-60	press@kzharyk.kz
Sergey Kotlyarov	Technical Contact	57/3 Mukanova Street, Karaganda	+7 701 908 81 82	PTS-11@kzharyk.kz
Talgat Ismagambetov	Environmental Contact	57/3 Mukanova Street, Karaganda	+7 701 400 27 27	PTS-1@kzharyk.kz

Table 5: Roles and responsibilities for implementation of the Stakeholder Engagement Plan

Role	Key tasks
Project Manager	■ Holds overall responsibility for Project implementation in accordance with national legislation and Lender requirements. ■ Ensures that sufficient human, financial and technical resources are allocated for SEP implementation. ■ Oversees the effective implementation of the SEP and the GRM and regularly reviews their effectiveness. ■ Ensures the management of labour and working conditions, gender equality, human rights, and community health and safety in accordance with Lender requirements. ■ Supervises contractors and ensures that their engagement and grievance-handling obligations are met. ■ Works closely with the Project E&S coordinator and the Social Manager / Community Liaison Officer.
Social Manager / Community Liaison Officer	■ Implements and updates the SEP and maintains the stakeholder register, including the register of affected land users. ■ Engages with akimats, local leaders and NGOs and conducts consultations with local communities and land users in accordance with this SEP. ■ Ensures timely disclosure of Project information on the Company's website and through offline channels. ■ Follows up grievances received during engagement and monitors their resolution. ■ Prepares quarterly and annual reports on engagement and grievances.
GRM Manager (head of chancellery)	■ Ensures registration of all Project-related grievances in the grievance register and their assignment to the responsible units and contractors. ■ Ensures timely acknowledgement, investigation and response within the established timeframes. ■ Ensures confidential handling of grievances and analyses grievances by category and location.
GBVH focal point	■ Acts as the focal point for women and for survivors of GBVH and ensures the timely, confidential and survivor-centred handling of such grievances, including anonymous grievances. ■ Maintains referral arrangements with support services and NGOs. ■ Develops awareness materials on GBVH for Company and contractor personnel, in cooperation with the HR Department. ■ Provides ongoing support to survivors, witnesses and/or persons reporting violations, as needed, and monitors and reports on GBVH risks.
Public Relations Department and RES dispatch services	■ Publish Project information on the website and social media and maintain the call centre. ■ Notify consumers, akimats and socially important facilities of planned and emergency power interruptions.
EPC contractors	■ Designate community liaison staff and implement notification, information-board and grievance-handling requirements. ■ Transfer grievances received to KZh within one working day. ■ Ensure that workers comply with the code of conduct and are informed about the worker grievance mechanism.

7.2 Monitoring and Reporting

The Company will monitor the implementation of this SEP and the effectiveness of the GRM using, among others, the following indicators:

- number of consultation meetings held, by settlement, and number of participants (disaggregated by gender);
- number of affected landholders and land users identified, consulted and with signed agreements, and number of entry/exit records signed off;
- number of Project-related planned power interruptions and share notified at least three days in advance, including through offline channels;
- number of grievances and enquiries registered, closed and outstanding during the reporting period, including comparison with the previous period;
- number of grievances by category, settlement, sub-project and submission channel, including GBVH-related grievances (anonymised);
- share of grievances acknowledged within three days and resolved within 15 and 30 calendar days;
- number of repeat grievances on the same topic or from the same stakeholder, and number of grievances referred to mediation or the courts.

The Social Manager / Community Liaison Officer will prepare quarterly internal reports on engagement and grievances during construction, with an analysis of recurring issues and of corrective actions taken. The Company will report to the EBRD on the implementation of this SEP and on grievances annually, as part of its annual environmental and social report, and will promptly inform the EBRD of any significant grievances or serious incidents as required by the financing agreement. The Company will also report annually on the implementation of this SEP on its website, including information on SEP updates, engagement activities undertaken, stakeholders engaged, grievance statistics, and agreements and outcomes achieved.

7.3 Review and Revision of the SEP

The SEP is a “living” document that will be used throughout the Project lifecycle. It will be updated as necessary to reflect relevant changes, such as changes in Project conditions, new requirements, identification of new stakeholders, revision of engagement methods and activities, changes in responsible personnel, and adjustments to the Project risk management and grievance redress process. The SEP will in any case be updated once design documentation and the results of environmental impact screening are available, before land formalisation and before the start of construction.

Independent audits or discussions with stakeholders may also identify the need to revise the SEP and the GRM. The SEP will be reviewed annually as part of a process of continual improvement.

ANNEX 1. GRIEVANCE FORM

Document number: *Filled in by an employee of the Company*	
Full name *Note: by submitting this form, you consent to the transfer of your personal data to authorised third parties involved in reviewing and resolving your complaint/appeal*	First and last name _____ □ I request confidentiality □ Confidentiality is not required
Contacts *Note: please indicate preferred method of contact (mail, phone, email)*	□ Address_____ □ Telephone number / email _____ _____
Preferred language for communication	☐ Kazakh ☐ Russian ☐ Other (please indicate) _____
A brief description of the accident / complaint: What is your concern / grievance? What happened? Where and when did it happen? Who did it happen to? What is the result of the problem?	
Date of accident / complaint	*Indicate date (month and year)*
	☐ **Once (date)** ☐ **Occurred repeatedly (how many times?):** ☐ **Occurs at the moment (current problem)**
What in your opinion should be undertaken to solve the problem?	
Signature: *Date:* Please send this form to zharyk@kzharyk.kz or 57/3 Mukanova Street, Karaganda, 100008, or hand it in at the KZh office or your local akimat	

ANNEX 2: GRIEVANCE REGISTER TEMPLATE

Date of Complaint Receipt	Applicant's Name	Applicant's Contact Information	Grievance Channel	Grievance category (Section 6.1)	Description of Grievance	Person Responsible for Resolution	Proposed Solution	Date of Communication of Solution	Status