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Stakeholder Engagement Plan

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List of Abbreviations

ADB	- Asian Development Bank
BBS	- Beineu-Bozoy-Saksaulsk
DBK	- Development Bank of Kazakhstan
EBRD	- European Bank for Reconstruction and Development
ESIA	- Environmental and Social Impact Assessment
ESAP	- Environmental and Social Action Plan
ESP	- Environmental and Social Policy
ESR	- Environmental and Social Requirement
FS	- Feasibility Study
GRM	- Grievance Redress Mechanism
IBRD	- International Bank for Reconstruction and Development
ITS	- Intelligent Transport Systems
JSC	- Joint Stock Company
NGO	- Non-Governmental Organization
NTS	- Non-Technical Summary
PCR	- Public Consultation Report
QAJ	- KazAvtoZhol
RoK	- Republic of Kazakhstan
RMF	- Road Maintenance Facility
SEP	- Stakeholder Engagement Plan
TRACECA	- Transport Corridor Europe-Caucasus-Asia

1 Introduction

The construction of the 559-km Beineu-Bozoy-Saksaulsk (BBS) Road to Category II technical standards will form part of the Transport Corridor Europe-Caucasus-Asia (TRACECA), transport corridor, facilitating overland trade between China and Western Europe via Kazakhstan. The BBS Road will enhance the transport and logistics potential of the Mangystau and Aktobe regions by improving the road's technical standards, increasing its capacity, and reducing travel times. As part of the "Centre-West" Transport Corridor, the road will also contribute to the development of modern transport infrastructure, thereby supporting improved regional connectivity and more efficient movement of people and goods.

The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") has considered providing a sovereign-guaranteed loan to JSC¹ National Company "KazAvtoZhol" (the "Company", the "Client", or "QAJ"), a 100% state-owned national road operator in Kazakhstan, to finance the design, construction and maintenance of Lots 1 to 4 (km 0+000 to km 160+000; approximately 161.5 km) of the BBS Road Project, including its components (such as access roads, road maintenance units, and other ancillary infrastructure).

The Bank engaged a consultant (the "Consultant") to undertake the **Environmental and Social Impact Assessment (ESIA) and prepare the full ESIA disclosure package for Lots 1 to 7 (km 0+000 to km 286+000)** of the Project in accordance with the EBRD Environmental and Social Policy (ESP, 2024) and the Environmental and Social Requirements (ESRs). **Under a Reliance Letter agreed between EBRD, the Consultant and the World Bank, the World Bank may rely on these ESIA deliverables, in the same way as EBRD, for its own financing, appraisal and supervision of Lots 5 to 7.**

The Project has been classified as a **Category A** project in accordance with the EBRD ESP, 2024. As such, the Project is subject to a comprehensive ESIA, together with the preparation of associated environmental and social documentation. The ESIA disclosure package will be made publicly available for a minimum period of 120 days prior to the Project being considered for approval by the EBRD Board of Directors.

The 559 km BBS Road is financed by the EBRD, the International Bank for Reconstruction and Development (IBRD) / World Bank, the Asian Development Bank (ADB), and the Republic of Kazakhstan, through the Development Bank of Kazakhstan (DBK), with the road divided into four financing sections (lot groups), each allocated to a different financier:

- EBRD: Lots 1 to 4 (km 0+000 - km 160+000),
- IBRD / World Bank: Lots 5 to 7 (km 160+000 - km 286+000),
- ADB: Lots 8 to 10 (km 286+000 - km 410+000),
- DBK: Lots 11 to 14 (km 410+000 - km 559+166).

¹Joint Stock Company

This **Stakeholder Engagement Plan (SEP)** has been prepared in accordance with EBRD ESR 10 - Stakeholder Engagement to establish a systematic approach to stakeholder identification, consultation, information disclosure and grievance management throughout the Project lifecycle. The SEP provides a framework for meaningful engagement with Project-affected people and other interested stakeholders and will be updated as the Project progresses to reflect changes in Project design, stakeholder groups and engagement needs.

The main objectives of this SEP are to:

- present the applicable national legal framework and EBRD ESR 10 requirements relating to stakeholder engagement;
- identify and analyse Project stakeholders, including affected parties, other interested parties, vulnerable people and underrepresented groups, and determine where differentiated forms of engagement may be required;
- establish a stakeholder engagement programme for the Project, including arrangements for timely disclosure of relevant, understandable and accessible information and meaningful consultation throughout the Project lifecycle;
- provide stakeholders with appropriate opportunities to express their views, concerns and feedback, and establish arrangements for considering and responding to stakeholder feedback in Project planning and implementation;
- establish an accessible and effective grievance mechanism for receiving, registering, addressing and monitoring stakeholder grievances and concerns; and
- define the responsibilities, monitoring and reporting arrangements for implementation of stakeholder engagement activities.

2 Project Description

The alignment of the Beineu-Bozoy-Saksaulsk (BBS) Road and its planned connections with Kazakhstan's existing road network are shown in **Figure 1**. The proposed BBS Road crosses the Mangystau, Aktope and Kyzylorda regions. **Figure 2** provides a more detailed overview of the road alignment, showing its distribution across the three regions and the respective sections to be financed by the EBRD, IBRD, ADB and DBK.

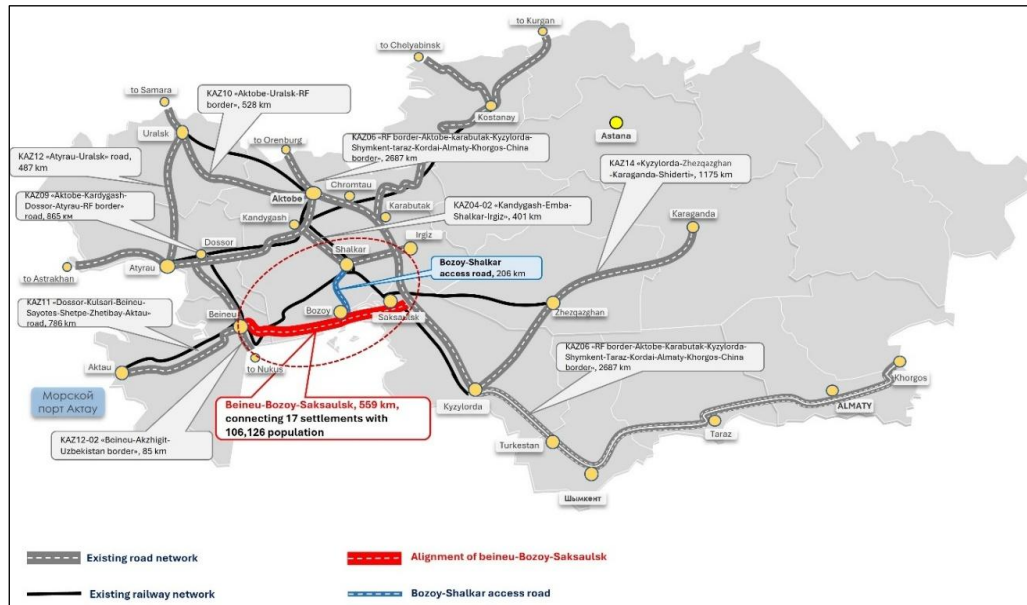


Figure 1 - Existing road network in the wider Project area and the location of the BBS road

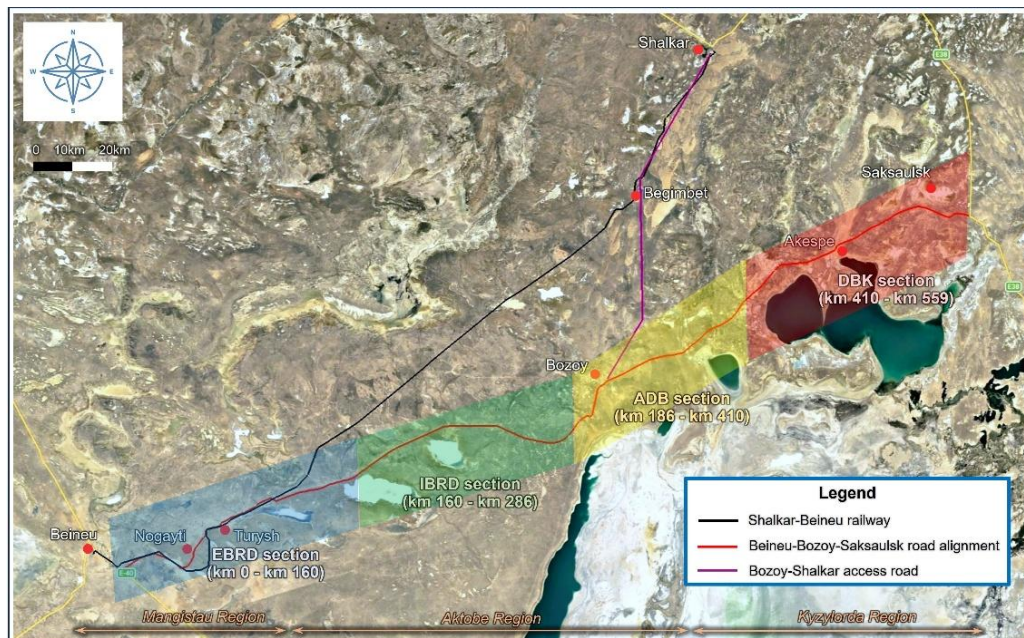


Figure 2 - BBS road alignment and division of the EBRD-, IBRD-, ADB-, and DBK-financed sections

Currently, travel between Saksaulsk and Beineu requires a journey of approximately 1,460 km via the existing Saksaulsk-Irgiz-Karabutak-Khromtau-Aktobe-Kandyagash-Dossor-Kulsary-Beineu route. The proposed 559-km Beineu-Bozoy-Saksaulsk Road will reduce the road distance between the two settlements by approximately 900 km. Based on an assumed average travel speed of 81 km/h, including allowances for stops, the new road is expected to shorten the overall journey time by approximately threefold.

At the broader regional level, the BBS Road will shorten the Kazakhstan section of the TRACECA corridor by approximately 900 km. It will also improve connectivity between Beineu and Astana via the Centre-West Transport Corridor, reducing the travel distance by approximately 950 km and travel time by around 11 hours.

The Project concept presented in the local Feasibility Study envisages the development of the **Category II Beineu-Bozoy-Saksaulsk (BBS) Road** in two phases.

Phase I comprises the construction and reconstruction of the 559.2 km BBS Road, divided into 14 construction sections, including the construction of grade-separated interchanges. Of the total road length, approximately 125 km is located in Beineu District of Mangystau Region, 245 km in Baiganin and Shalkar Districts of Aktobe Region, and 189.2 km in Aral District of Kyzylorda Region.

Phase II includes the installation of Intelligent Transport Systems (ITS), the construction and rehabilitation of Road Maintenance Facilities (RMFs), and the construction or rehabilitation of access roads to settlements.

The access road component has a total length of approximately 240.5 km and comprises:

- a 1.5-km Category V access road to Turysh rural settlement;
- a 206-km Category IV access road to Shalkar town; and
- a 33-km Category IV access road to Saksaulsk rural settlement.

The road maintenance component comprises the construction of new Road Maintenance Facilities (RMFs) north of Turysh village in Beineu District, north of Shalkar (2.7 ha), and north of Akespe village in Aral District (2.7 ha), as well as the rehabilitation of the existing RMF in Shalkar.

For the purposes of this SEP, the primary focus is on stakeholders associated with the **EBRD-financed 160 km and IBRD-financed 126 km** sections of the BBS Road (the Project), including its associated components such as access roads and Road Maintenance Facilities (RMFs). The stakeholder engagement principles and arrangements established in this SEP may also be applied, as relevant, to stakeholders associated with other sections of the BBS Road considered as associated facilities to the Project.

The EBRD- and IBRD-financed sections of the BBS Project covered by this SEP extend across two regions (Mangystau and Aktobe), three districts (Beineu, Baiganin and Shalkar) and seven rural districts, and pass in the vicinity of the rural settlements of Syngyrlau, Nogayty, Sam and Turysh. The geographical extent of the Project and the number of administrative jurisdictions and communities involved mean that Project stakeholders are diverse and geographically

dispersed. Effective stakeholder engagement will therefore require systematic coordination with regional, district and rural authorities, affected communities, land users and other interested parties, as well as appropriate arrangements to ensure that their views, concerns and recommendations are identified, considered and addressed throughout Project planning and implementation.

3 Legal and EBRD Requirements for Stakeholder Engagement

3.1 National Requirements of the Republic of Kazakhstan

The principal national requirements relevant to stakeholder engagement, public participation and information disclosure in relation to the Project are established by the Environmental Code of the Republic of Kazakhstan, the regulations governing environmental assessment and public hearings, and the Law on Access to Information.

Kazakhstan is a **Party to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention)**, which was ratified by Kazakhstan in 2000 and entered into force for the country in 2001. The Convention establishes obligations based on three key principles: **access to environmental information, public participation in environmental decision-making, and access to justice in environmental matters**. These principles are reflected in Kazakhstan's national environmental legislation and are directly relevant to the Project's information disclosure and public participation process.

The Environmental Code of the Republic of Kazakhstan² establishes the principal national requirements for public participation in environmental decision-making and access to environmental information.

Articles 15 and 17-21 of the Environmental Code establish the general framework for public participation in environmental decision-making and access to environmental information, including the right of the concerned public to submit comments and opinions and to obtain complete, reliable and timely environmental information.

Article 16 establishes the responsibility of State and local authorities to support public access to environmental information and participation in environmental matters.

Articles 68 and 71-74 of the Environmental Code establish requirements for information disclosure and public participation in relation to proposed activities subject to EIA. **Article 72** requires the Report on Possible Impacts to include information on the proposed activity, its location and potential environmental impacts, together with a non-technical summary for the concerned public. The draft Report is made available for public review, and the concerned public may submit comments and proposals before and during public hearings. The outcomes of public participation are taken into account by the competent environmental authority when issuing the **EIA Conclusion, which determines the environmental acceptability of the proposed activity and establishes the conditions for its implementation**.

The Environmental Code also provides mechanisms for public involvement **beyond the environmental assessment stage**. **Article 13** entitles the public to raise concerns with the competent authorities regarding potential environmental damage, violations of environmental legislation or circumstances that may give rise to such impacts, and to receive information on

²No. 400-VI ZRK. <https://adilet.zan.kz/rus/docs/K2100000400>

the outcome of such complaints. These rights are applicable throughout Project lifecycle, including during construction and operation.

The **Instruction on the Organisation and Conduct of Environmental Assessment**³ further details the procedures established by the Environmental Code. In particular, it defines the **concerned public** as individuals and organisations residing, working, carrying out activities, owning property or using natural resources within the affected area, as well as those whose interests may be affected by the environmental or health impacts of a proposed activity. The definition also includes persons and environmental organisations interested in participating in the environmental assessment process.

The **Rules for Conducting Public Hearings**⁴ further specify the procedures for public participation established by the Environmental Code. The Rules define the forms, notification arrangements and timing of public hearings, requirements for disclosure of relevant documentation, procedures for submission and consideration of comments and proposals, and requirements for recording and disclosure of consultation outcomes. Public hearings are conducted through **open meetings or public discussions via the Unified Environmental Portal**⁵, as applicable, with the participation of the relevant local executive authorities. The Rules also provide for the use of additional methods of informing the concerned public, which may supplement the statutory disclosure and notification arrangements.

The **Law on Access to Information**⁶ establishes the general framework for public access to information and promotes transparency and **public participation in decision-making**. The Law provides for timely, complete and equal access to information and introduces the principle of **proactive disclosure**, whereby information may be disseminated without a specific request in order to promote transparency and facilitate public participation in decisions affecting public rights and interests. These provisions complement the more specific public disclosure and participation requirements established under the Environmental Code.

3.2 EBRD Requirements

The **EBRD Environmental and Social Policy (ESP, 2024)** and its Environmental and Social Requirements establish the requirements applicable to stakeholder engagement and public consultation for EBRD-financed projects. In particular, **ESR 1 - Assessment and Management of Environmental and Social Risks and Impacts** requires stakeholder engagement to form an integral part of the assessment and management of Project environmental and social risks and impacts, while **ESR 10 - Stakeholder Engagement** establishes specific requirements for stakeholder identification, information disclosure, meaningful consultation, grievance management and ongoing engagement throughout the Project lifecycle.

³Order of the Minister of Environmental Protection of the RoK dated July 30, 2021 No. 280,

<https://adilet.zan.kz/rus/docs/V2100023809>

⁴Approved by an Order of the Acting Minister of Ecology, Geology and Natural Resources of the RoK dated August 3, 2021 No. 286 <https://adilet.zan.kz/rus/docs/V2100023901>

⁵<https://ecoportal.kz>

⁶No. 401-V dated 16 November 2015, last amended 12.07.2026, available through <https://adilet.zan.kz/rus/docs/Z1500000401>

ESR 10 defines stakeholder engagement as an **inclusive and ongoing process**, which should commence at an early stage of Project planning and continue throughout Project implementation. The engagement process should be proportionate to the nature and scale of the Project, its stakeholders and potential environmental and social risks and impacts. It includes **stakeholder identification and analysis, planning of engagement activities, disclosure of relevant environmental and social information, meaningful consultation, consideration of stakeholder feedback, and establishment of an accessible grievance mechanism**. Particular attention is required to ensure that engagement is inclusive of **vulnerable people and underrepresented groups** and that any specific or differentiated engagement needs are identified and addressed.

For Category A projects, ESR 10 requires a formalised and participatory disclosure and consultation process to be integrated into the ESIA process. Stakeholder engagement should commence during ESIA scoping and provide stakeholders with opportunities to comment on relevant scoping documents. The ESIA and associated documentation are subsequently subject to public disclosure and consultation prior to the EBRD financing decision.

Following completion of the ESIA disclosure and consultation period, ESR 10 requires the Client to publicly disclose a summary of the consultation process, including stakeholder feedback received and the Client's responses. EBRD guidance recommends documenting this process through a **Public Consultation Report (PCR)**, which should demonstrate how stakeholder feedback has been considered and, where relevant, how it has influenced the ESIA and associated avoidance, mitigation or compensation measures. The PCR may be disclosed as an annex to the ESIA or as a standalone document. Where stakeholder feedback results in potentially material changes to the ESIA or associated mitigation measures, these are addressed in accordance with the requirements of ESR 1.

Engagement continues beyond the ESIA process, including during Project implementation and operation, and should provide stakeholders with opportunities to raise concerns and provide feedback on Project impacts and the effectiveness of mitigation measures.

Overall, **Kazakhstan legislation establishes a comprehensive framework for public access to environmental information and participation in environmental assessment and related decision-making**, including disclosure of EIA documentation, submission and consideration of public comments and participation in public hearings. While national legislation provides for access to environmental information and public participation, **EBRD ESR 10 requires a more structured and continuous stakeholder engagement process throughout the Project lifecycle**, including specific attention to vulnerable people and underrepresented groups, ongoing consultation and a Project-level grievance mechanism.

Accordingly, **this SEP builds on the national public participation requirements and establishes the additional engagement arrangements necessary to meet EBRD ESR 10**. These arrangements will apply throughout Project preparation, construction and operation and will supplement the statutory consultation and disclosure procedures, where required.

4 Stakeholder Identification and Analysis

4.1 Stakeholder Identification Methodology

Stakeholders are identified through a review of Project documentation and the Project area of influence, analysis of relevant administrative and institutional structures and available socio-economic information, as well as consultations conducted during the ESIA scoping process. Field visits and discussions with regional, district and rural authorities, local communities and other stakeholders are also used to identify potentially affected groups, land users and other interested parties. Stakeholder identification also applies a snowball approach, whereby initially identified stakeholders help identify additional groups or individuals that may be affected by or have an interest in the Project.

Once identified, stakeholders are analysed to understand their relationship with the Project, the extent to which they may be affected by or have an interest in the Project, and any specific engagement needs. This analysis helps determine the appropriate level and methods of engagement for different stakeholder groups. Stakeholders are assessed against the following criteria:

- **Impact:** the extent to which individuals or groups may be directly or indirectly affected by the Project, including through environmental and social impacts, land acquisition, access restrictions or other changes associated with Project implementation;
- **Influence:** the extent to which a stakeholder may influence Project planning, implementation or management of environmental and social risks and impacts;
- **Interest:** the level of interest that individuals or organisations may have in the Project, irrespective of whether they are directly affected; and
- **Vulnerability and engagement needs:** whether particular individuals or groups may be more adversely affected by Project impacts or may face barriers to accessing information, participating in consultations or using the Project grievance mechanism.

For the purpose of planning and implementing stakeholder engagement, **identified stakeholders are grouped into two broad categories in accordance with EBRD ESR 10: affected parties and other interested parties. Affected parties** include individuals, communities and organisations that are affected or likely to be affected by the Project and its environmental and social impacts. **Other interested parties** include individuals, organisations and institutions that may have an interest in the Project, influence its implementation or have responsibilities relevant to the Project.

Particular consideration is given to **vulnerable people and underrepresented groups** who may be more adversely affected by Project impacts or may face barriers to accessing information, participating in consultations or using the Project grievance mechanism.

Stakeholder identification is an **ongoing process** and will be reviewed and updated throughout the Project lifecycle as the Project design develops, additional affected parties are identified and stakeholder interests or engagement needs change.

4.2 Stakeholder Analysis

The stakeholder analysis provides a structured overview of the main stakeholder groups identified in relation to the Project and their relationship with, potential exposure to, and interest in the Project. The analysis helps identify the key environmental and social issues relevant to different stakeholder groups and determine appropriate engagement approaches under this SEP. The analysis is based on the current Project concept and the outcomes of the ESIA process and will be reviewed and updated as the Project design develops and additional stakeholders or engagement needs are identified. **Table 1** below focuses on stakeholders relevant to the EBRD 286-km road section and associated Project components, while also recognising stakeholders of associated facilities where their interests or potential impacts are relevant to the Project.

Table 1 - Stakeholders Groups, Potential and Interests

Stakeholder groups	Potential impacts / interests and relationship to the Project
Affected parties	
Residents of settlements located in the vicinity of the Project alignment, including Syngyrlau, Nogayty, Sam, Turysh	May be potentially affected by: - construction-related dust, noise, vibration and air emissions; - increased construction traffic and road safety risks; - temporary disruption of local access and movement of people and livestock; - labour influx and worker–community interactions; - pressure on local services and infrastructure, where relevant; - community health and safety risks associated with construction activities. May be interested in: - improved regional and local connectivity and reduced travel times; - safer and more reliable access to district and regional centres, markets and services; - employment and local procurement opportunities; - location and design of access roads, junctions, crossings and other local connectivity measures; - information on Project progress, construction schedules and E&S impacts and mitigation measures.
Farming enterprises, agricultural cooperatives and other land users whose leased pastureland may be affected by the Project	May be potentially affected by: - permanent acquisition of leased pastureland and associated economic losses; - severance or fragmentation of pastureland by the road; - restrictions on access to grazing areas; - loss of or restricted access to land improvements and livestock infrastructure, including wintering facilities and artesian wells; - disruption of livestock movement during construction and operation; - dust, waste or accidental pollution affecting grazing areas. May be interested in: - compensation for affected land use rights, improvements and economic losses; - design and location of cattle crossings and other measures maintaining access between pasture areas; - avoidance or minimisation of impacts through final alignment and detailed design;

Stakeholder groups	Potential impacts / interests and relationship to the Project
	- timing of land acquisition and construction activities; - transparent valuation, compensation and grievance procedures.
Livestock owners and other users of grazing areas who may not hold formal land use rights	May be potentially affected by: - disruption of traditional or informal livestock movement routes; - reduced or more difficult access to grazing areas and water points; - construction-related safety risks for livestock and herders. May be interested in: - maintenance of livestock movement and access; - appropriate location of cattle crossings; - advance information on construction activities and temporary access restrictions; - accessible grievance and feedback channels.
Road users and transport operators using existing roads and local access routes	May be potentially affected by: - temporary traffic disruption, diversions and increased heavy vehicle movements during construction; - road safety risks at construction interfaces and junctions. May be interested in: - substantial reduction in travel distance and time once the Project is operational; - improved road condition, reliability and year-round connectivity; - road safety arrangements, junction design, signage and roadside services.
Local businesses, service providers and SMEs in Project districts	May be potentially affected by: - temporary changes in traffic and demand during construction; - increased workload and competition associated with construction activities. May be interested in: - procurement and subcontracting opportunities; - provision of accommodation, catering, fuel, transport, equipment and other services; - increased economic activity and improved market access resulting from the new road; - information on procurement procedures and construction schedules.
Potentially vulnerable people and underrepresented groups	
Women, including rural women and women-headed households	May face barriers to participation in conventional consultation formats or have different concerns regarding community safety, mobility, employment and access to services. May be interested in: - road and community safety; - improved access to healthcare, education and other services; - local employment and livelihood opportunities; - consultation arrangements that enable effective participation by women.
Older people, persons with disabilities, low-income households and other people who may face barriers to participation or be disproportionately affected	May be particularly sensitive to temporary access disruption, road safety risks or changes affecting access to services and transport. Engagement needs may include: - accessible and locally appropriate information; - consultation methods adapted to mobility, communication or other participation barriers; - clear information on access changes, construction schedules and grievance channels.

Stakeholder groups	Potential impacts / interests and relationship to the Project
Other interested parties	
Regional, district and rural authorities (Akimats) within the Project area	Have administrative and statutory responsibilities relevant to land, local infrastructure, community services, public consultation and local development. May be interested in: - Project design and implementation schedule; - land acquisition and access arrangements; - local employment and procurement; - community health and safety and road safety; - coordination of engagement with local communities and land users; - Project benefits and local development implications.
Relevant national and regional public authorities	Public authorities with regulatory, permitting, oversight or sectoral responsibilities relevant to the Project, including in relation to roads and transport, environmental protection, land resources, agriculture, water resources, public health, emergency response and cultural heritage. May be interested in: - compliance with national legislation and permitting requirements; - environmental and social performance; - land acquisition and land management; - road safety and technical standards; - protection of natural resources and cultural heritage.
Environmental, social and community-based NGOs and civil society organisations	May be interested in: - Project environmental and social impacts and mitigation measures; - biodiversity, land use, community health and safety and social impacts; - transparency of ESIA disclosure and consideration of stakeholder feedback; - monitoring of Project implementation and E&S commitments.
Educational institutions, schools and healthcare facilities serving Project-area communities	May be interested in: - construction and operational road safety; - safe access for pupils, staff, patients and emergency services; - improved connectivity and access to education and healthcare; - potential temporary disruption associated with construction traffic.
National, regional and local media	May be interested in: - Project scope, progress and expected regional benefits; - environmental and social impacts and mitigation measures; - public consultation and stakeholder concerns; - provision of accurate and timely Project information to the wider public.
Railway, utility and other infrastructure operators whose assets or operations may interface with the Project	May be potentially affected by crossings, interfaces or construction activities near existing infrastructure. May be interested in: - technical coordination and protection of existing assets; - access to infrastructure for operation and maintenance; - construction scheduling and interface management; - emergency and safety arrangements.
Stakeholders of Project associated facilities	May be affected by or have an interest in associated access roads, RMFs and other facilities functionally linked to the Project. Their specific interests and potential impacts will be assessed and addressed through the relevant Project environmental and social instruments and stakeholder engagement activities, as applicable.

The stakeholder analysis indicates that the Project involves a diverse range of stakeholders with different levels of exposure to Project impacts and different interests in its implementation. Key issues identified include land acquisition and use of pastureland, maintenance of access and livestock movement, community and road safety, construction-related impacts, local employment and procurement opportunities, and improved regional and local connectivity. Particular attention is required to ensure the effective participation of vulnerable people and underrepresented groups.

Based on the stakeholder analysis, the following section sets out the Stakeholder Engagement Programme, including the proposed engagement methods, information disclosure arrangements and engagement activities for the different stakeholder groups throughout the Project lifecycle.

5 Stakeholder Engagement Programme

5.1 Stakeholder Engagement Approach

The stakeholder analysis indicates that the Project involves a diverse range of stakeholders with different levels of exposure to Project impacts and different interests in its implementation. Key issues identified include land acquisition and use of pastureland, maintenance of access and livestock movement, community and road safety, construction-related impacts, local employment and procurement opportunities, and improved regional and local connectivity.

Engagement with affected parties will focus on Project activities and environmental and social impacts that may directly affect them, including land acquisition, access and livestock movement, community health and safety, construction-related impacts and associated mitigation measures. Engagement will primarily involve direct and locally accessible methods, including community meetings, meetings and interviews with affected land users, focus group discussions, small-group or individual consultations where appropriate, and dissemination of Project information through local authorities and other locally appropriate communication channels. Engagement with affected parties will provide opportunities to discuss specific concerns, agree practical mitigation measures, where relevant, and raise grievances through the Project grievance mechanism.

Engagement with other interested parties will reflect their respective interests, responsibilities and potential involvement in Project implementation. Methods will include formal correspondence and information exchange with relevant public authorities, institutional meetings and consultations, thematic discussions with relevant organisations, and public disclosure of Project information and environmental and social documentation. NGOs, media, educational and other interested organisations will be engaged through disclosure of relevant information and invited to participate in public consultations and other engagement activities, as appropriate.

Particular attention will be given to **vulnerable people and underrepresented groups** within affected communities. Where conventional consultation methods may limit their participation, differentiated approaches, such as targeted meetings, smaller group discussions or other accessible forms of engagement, will be used to facilitate their effective participation and ensure that their views and concerns are adequately considered.

Based on the stakeholder analysis, the following section sets out the **Stakeholder Engagement Programme**, including the proposed engagement methods, information disclosure arrangements and engagement activities for the different stakeholder groups throughout the Project lifecycle.

5.2 Stakeholder Engagement Program

The Stakeholder Engagement Programme sets out the planned engagement activities for the identified stakeholder groups throughout the relevant stages of the Project. It is intended to

support timely and effective communication, facilitate meaningful consultation, provide opportunities for stakeholders to raise questions, concerns and grievances, and maintain constructive relationships between the Project and its stakeholders.

The Program covers the Project design, pre-construction, construction and operation phases and defines the stakeholder groups to be engaged, the information to be disclosed, proposed engagement methods and timing, and responsibilities for implementation. The methods and frequency of engagement will be tailored to each stakeholder group, taking into account the Project stage, the issues relevant to that group and the extent to which they may be affected by the Project.

The Program will be reviewed and updated throughout the Project lifecycle to reflect changes in Project design and implementation, emerging environmental and social issues, stakeholder feedback and the identification of additional stakeholders or engagement needs. More frequent or targeted engagement will be undertaken where specific impacts, concerns or Project activities require additional consultation.

Table 2 - Stakeholders Engagement Programme

Nº	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location
1	PROJECT DESIGN AND ESIA DISCLOSURE STAGE					
1.1	Establish and maintain a dedicated Project webpage or section on the Project Owner's corporate website	All stakeholders	Project overview; key Project updates; SEP, including the Project grievance mechanism and contact details; other relevant E&S information	Prior to ESIA disclosure and updated as relevant throughout the Project lifecycle	KazAvtoZhol / Project Implementation Team	Project Owner's corporate website / dedicated Project webpage
1.2	Disclosure of the Project E&S documentation, including the ESIA, ESAP, SEP and Non-Technical Summary (NTS)	All stakeholders	ESIA disclosure package in the languages and formats agreed with EBRD, including ESIA, ESAP, SEP and NTS	In accordance with EBRD disclosure requirements and prior to the EBRD financing decision; documents to remain publicly accessible	KazAvtoZhol / Project Implementation Team	Project webpage; EBRD website; hard copies at appropriate regional, district and rural Akimat offices and other accessible local locations; ESIA disclosure meetings
1.3	Conduct ESIA disclosure consultations and document stakeholder feedback	Affected parties and other interested parties, including local communities, land users, public authorities, NGOs and other interested organisations	ESIA findings; key E&S impacts and mitigation measures; land acquisition and access issues; road and community safety; SEP and grievance mechanism	During the ESIA disclosure and consultation period	KazAvtoZhol / Project Implementation Team; ESIA consultants; relevant Akimats	Public meetings and targeted consultations in Project-area settlements; meetings with authorities and organisations; written and electronic feedback channels
1.4	Conduct consultations with JSC NC "Kazakhstan Temir Zholy" and obtain its feedback on the proposed mitigation measures for the Ustyurt saiga population	NC "Kazakhstan Temir Zholy"	Proposed mitigation measures to secure Ustyurt Saiga migration routes and crossings over the railway	During the ESIA disclosure and consultation period	KazAvtoZhol / Project Implementation Team; ESIA consultants	Online or in person meeting, written and electronic feedback channels
1.5	Establish the Project grievance mechanism and disclose information on how grievances and enquiries can be submitted	Affected parties and other interested parties	SEP; grievance procedure; grievance form; contact details of the designated Project contact person(s)	Prior to commencement of construction and maintained throughout the Project lifecycle	KazAvtoZhol / Project Implementation Team; designated SEP/Grievance Mechanism contact person	Project webpage; Akimat offices; information boards; consultation meetings; other locally accessible channels
1.6	Conduct targeted consultations with potentially affected land	Farming enterprises, agricultural cooperatives,	Available alignment and land acquisition information;	During Project design and land acquisition planning,	KazAvtoZhol / Project Implementation Team;	Individual and small-group meetings; field consultations

Nº	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location
	users on land acquisition, severance, access and livestock movement	livestock owners and other users of grazing areas potentially affected by the Project	potential land take and severance; compensation framework; access arrangements; cattle crossings; grievance mechanism	and before finalisation of relevant land acquisition and access arrangements	relevant Akimats; land acquisition specialists / consultants	at affected land plots and farms; Akimat offices; direct communication with affected land users
1.7	Conduct targeted engagement with vulnerable people and underrepresented groups	Vulnerable people and underrepresented groups within affected communities	Project information relevant to the group; potential impacts and mitigation; access and safety; opportunities to participate; grievance mechanism	During ESIA disclosure and subsequently as required	KazAvtoZhol / Project Implementation Team; relevant Akimats; ESIA/E&S specialists	Targeted meetings, small-group discussions and other accessible consultation formats appropriate to identified needs
1.8	Media coverage of the Project progress, planned activities, achievements and any relevant E&S news	All stakeholders	Announcements in the newspapers, news channels, magazines about the Project's scope and technical measures envisioned, press releases	Upon signing of the Loan Agreement between the Company and the EBRD and then regularly or when the Project news is available during the Project life-cycle	KazAvtoZhol / Project Implementation Team;	Respective media channels / means (mirrored at the Project's webpage)
2	PRE-CONSTRUCTION STAGE					
2.1	Notify affected communities and other relevant stakeholders of the planned commencement and schedule of construction works	Affected communities, land users, road users, local businesses and relevant public authorities	Construction schedule and locations; traffic and access arrangements; contact details and grievance mechanism	Prior to commencement of construction works in the relevant area and updated where schedules materially change	KazAvtoZhol / Project Implementation Team; Contractor(s); relevant Akimats	Project webpage; local Akimat channels; information boards; community notifications; local media and social media, as appropriate
2.2	Consult on and communicate traffic management, road safety and temporary access arrangements	Affected communities, road users, land users, schools/ healthcare facilities where relevant, emergency services and road safety authorities	Traffic management measures; diversions; temporary access restrictions; road safety measures; construction traffic routes and schedules	Prior to relevant construction activities and whenever significant traffic or access arrangements change	Contractor(s), under oversight of KazAvtoZhol / Project Implementation Team; relevant authorities and Akimats	Community meetings; targeted institutional meetings; notices and information boards; local media/social media; direct notification where appropriate

Nº	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location
2.3	Confirm land access, cattle crossings and other measures required to maintain livestock and farm access	Affected farming enterprises, agricultural cooperatives, livestock owners and other grazing-area users	Final or sufficiently developed design information; locations of cattle crossings and access points; construction sequencing; temporary access measures	Before construction in affected areas and before access arrangements are finalised	KazAvtoZhol / Project Implementation Team; Contractor(s); relevant Akimats; land acquisition/E&S specialists	Field meetings and site walkovers; individual consultations; maps/design drawings; direct communication with affected land users
2.4	Install Project information boards and make grievance forms and contact information locally available	Affected communities and other local stakeholders	Project contact details; grievance mechanism; grievance forms; basic construction and safety information	Before commencement of construction in the relevant area and maintained during construction	Contractor(s), under oversight of KazAvtoZhol / Project Implementation Team	Construction sites/camps and other appropriate Project locations; relevant Akimat offices and accessible community locations
2.5	Provide information on local employment and procurement opportunities and applicable recruitment/procurement procedures	Local residents, local businesses, service providers and SMEs	Information on available employment and procurement opportunities; eligibility and application procedures; applicable labour and procurement requirements	Prior to and during mobilisation and as opportunities arise	Contractor(s), under oversight of KazAvtoZhol / Project Implementation Team	Project/Contractor information channels; Akimat offices; local announcements; meetings with local businesses and communities, as appropriate
3	CONSTRUCTION STAGE					
3.1	Provide regular updates on construction progress, upcoming activities and relevant E&S issues	Affected parties and other interested parties	Construction progress and schedule; upcoming works; traffic/access changes; key E&S mitigation measures; Project contact and grievance information	Throughout construction, with additional notification before activities likely to cause significant local disruption	KazAvtoZhol / Project Implementation Team; Contractor(s); relevant Akimats, as appropriate	Project webpage; information boards; community notices; local media/social media; meetings and direct notifications, as appropriate
3.2	Undertake ongoing consultations with affected communities and land users on construction-related impacts and mitigation measures	Affected communities, farming enterprises, livestock owners and other affected land users	Construction-related impacts; access and livestock movement; dust/noise; community health and safety; traffic; effectiveness of mitigation measures	Throughout construction, with frequency reflecting the nature and location of ongoing works and issues raised	Contractor(s) and designated community/E&S personnel, under oversight of KazAvtoZhol / Project Implementation Team	Community and small-group meetings; individual consultations; field visits; direct communication; grievance mechanism

Nº	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location
3.3	Maintain the Project grievance mechanism and record, investigate and respond to grievances, enquiries and suggestions	All stakeholders	Grievance records; responses and follow-up actions; information on grievance channels	Throughout construction and the Project lifecycle	Designated Grievance Mechanism contact person; Contractor(s) for construction-related grievances, under oversight of KazAvtoZhol / Project Implementation Team	Project webpage; telephone/email and written submissions; grievance boxes/forms; Akimat offices; direct contact with Project/Contractor representatives
3.4	Conduct targeted consultations in response to specific stakeholder concerns or emerging E&S issues	Stakeholders affected by or interested in the specific issue, with particular attention to affected parties and vulnerable people/underrepresented groups	Issue-specific information and proposed mitigation or corrective measures	As required throughout construction	KazAvtoZhol / Project Implementation Team; Contractor(s); relevant specialists and Akimats, as appropriate	Location and method tailored to the issue and stakeholder group, including individual, small-group, community or institutional meetings
3.5	Engage with relevant public authorities and emergency services on Project implementation and E&S management	Relevant national and territorial public authorities; regional, district and rural Akimats; emergency and road safety authorities	Project progress; permitting/compliance matters; E&S performance; traffic and road safety; emergency preparedness; land and access issues, as relevant	Throughout construction, as required by Project activities, regulatory processes and emerging issues	KazAvtoZhol / Project Implementation Team; Contractor(s), as relevant	Formal correspondence; coordination meetings; site visits; technical consultations
3.6	Update the SEP and publicly disclose relevant updates	All stakeholders	Updated SEP and, where relevant, updated stakeholder/contact information	Periodically and when material changes in Project activities, impacts, stakeholder groups or engagement needs occur	KazAvtoZhol / Project Implementation Team; designated SEP contact person	Project webpage and other disclosure locations used for the SEP
3.7	Report on Project E&S performance and stakeholder engagement in accordance with EBRD requirements	All stakeholders	Relevant public E&S performance information, including stakeholder engagement and grievance information, as appropriate	At least annually during Project implementation, or as otherwise agreed with EBRD	KazAvtoZhol / Project Implementation Team	Project webpage and other appropriate disclosure channels
4	OPERATION STAGE					

Nº	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location
4.1	Continue stakeholder engagement and disclosure on operational matters relevant to local communities and road users	Affected communities, road users, land users and other interested parties	Operational road safety; access issues; maintenance activities; relevant E&S performance information; grievance mechanism	Throughout operation, as relevant	KazAvtoZhol / responsible road operation and maintenance entity	Project/road authority information channels; local notifications; Akimat channels; meetings as required
4.2	Maintain the Project grievance mechanism for operational impacts and concerns	Affected parties and other interested parties	Grievance channels, contact details, responses and follow-up actions	Throughout operation	KazAvtoZhol / responsible road operation and maintenance entity	Published contact channels; written/electronic submissions; relevant local offices and other accessible channels
4.3	Undertake targeted consultations before significant maintenance, rehabilitation or changes that may affect communities, access or road safety	Potentially affected communities, land users, road users, local businesses and relevant public authorities	Planned works; schedule; traffic/access arrangements; potential impacts and mitigation measures	Prior to relevant maintenance/rehabilitation works or significant operational changes	KazAvtoZhol / responsible road operation and maintenance entity; Contractor(s), where applicable	Targeted meetings and notifications; Project/road authority channels; local media and Akimat channels, as appropriate

5.3 Information Disclosure

Project information will be disclosed throughout the Project lifecycle in accordance with applicable national requirements, EBRD requirements and the arrangements established in this SEP. The type and level of information disclosed will reflect the Project stage and the information needs of affected parties and other interested parties.

As a Category A project, the Project will be subject to formal public disclosure and consultation on the ESIA and associated environmental and social documentation. The ESIA disclosure package will include the ESIA Report, Non-Technical Summary (NTS), Stakeholder Engagement Plan (SEP), Environmental and Social Action Plan (ESAP) and other relevant environmental and social documents, as applicable. The disclosure package will be made publicly available for a minimum period of 120 days prior to consideration of the Project by the EBRD Board of Directors.

The disclosure package will be made available electronically through the relevant Project/QAJ and EBRD websites and in hard copy at accessible locations within the Project area, including relevant regional, district and rural Akimat offices, as appropriate. Key Project information and documents intended for affected communities will be provided in Russian and Kazakh, while the full disclosure package will be made available in the languages agreed with EBRD.

Information disclosure will not be limited to the formal ESIA disclosure period. Throughout Project implementation, stakeholders will be provided with relevant updates on Project progress, construction activities, potential impacts, traffic and access arrangements, land acquisition where applicable, mitigation measures and the Project grievance mechanism. Disclosure methods and locations will be adapted where necessary to ensure that information is accessible to affected communities, vulnerable people and underrepresented groups.

5.4 Responsibilities for SEP Implementation

QAJ will have overall responsibility for implementation of the SEP and for ensuring that stakeholder engagement is carried out in accordance with the commitments established in this document and applicable EBRD requirements.

A **designated SEP Focal Point** will coordinate day-to-day implementation of the SEP. The Focal Point will maintain communication with affected parties and other interested parties, coordinate planned engagement activities, ensure disclosure of relevant Project information, maintain records of stakeholder engagement, oversee implementation of the Project grievance mechanism, and coordinate follow-up actions arising from stakeholder feedback and grievances. The Focal Point will also coordinate engagement activities undertaken by Contractors and other parties acting on behalf of QAJ.

During construction, **Contractors** will be responsible for stakeholder communication directly related to their construction activities, including advance notification of works, temporary access restrictions, traffic management and other construction-related impacts. Contractors will be required to promptly communicate stakeholder concerns and grievances to the SEP

Focal Point and support their resolution. Contractor engagement activities will be undertaken within the framework of this SEP and under QAJ oversight.

Relevant regional, district and rural Akimats will support engagement with local communities and land users, including dissemination of Project information, organisation of local meetings and consultations and communication on matters falling within their respective responsibilities. Their involvement will complement, rather than replace, QAJ's responsibility for Project stakeholder engagement.

Other public authorities and organisations will be involved where engagement relates to their respective regulatory, administrative or sectoral responsibilities.

Responsibilities for individual engagement activities are further specified in the Stakeholder Engagement Programme presented above.

6 Project Grievance Mechanism

6.1 Purpose, Scope and Grievance Submission Channels

The Project Grievance Mechanism will be available to all external stakeholders, including affected communities and land users, other interested parties, organisations and individuals who wish to raise concerns related to the Project. Grievances may relate to any environmental or social issue associated with Project activities, including land acquisition and access restrictions, construction impacts, community health and safety, traffic and road safety, environmental impacts, behaviour of Project personnel or contractors, information disclosure and stakeholder engagement, or other concerns regarding Project implementation.

Access to the Grievance Mechanism will be free of charge, and stakeholders will be able to raise concerns openly and without fear of negative consequences. Grievances may be submitted anonymously, and requests for confidentiality will be respected. Where contact details are provided, the Project will communicate the outcome of the grievance review to the complainant. Use of the Grievance Mechanism will not restrict stakeholders from seeking administrative, judicial or other remedies available under Kazakhstan legislation. The mechanism is intended for external stakeholders and is separate from the workers' grievance mechanism established for Project workers.

Grievances may be submitted through several channels to ensure that the mechanism is accessible to different stakeholder groups. They may be submitted in writing, by e-mail, telephone, post or in person to the designated GRM Focal Point. Grievance boxes and other locally accessible submission channels may also be established within the Project area, as appropriate.

The designated GRM Focal Point within QAJ is:

Aizhan Yermukhanova

Head of the Centralised Procurement Control Service

JSC NC "QazAvtoJol"

E-mail: aizhan.yermukhanova@qaj.kz

Information on the available grievance submission channels and contact details of the GRM Focal Point will be disclosed through the Project website, information materials and other communication channels used under this SEP. Public Grievance Forms will be made available in Kazakh and Russian in electronic and hard-copy formats. Use of the standard grievance form will not be mandatory, and grievances received through any of the available channels will be registered and processed in accordance with the procedure described below.

6.2 Grievance Management, Records and Reporting

The GRM Focal Point will be responsible for coordinating the grievance process, including registration and initial assessment of grievances, coordination with relevant QAJ personnel, Contractors and public authorities, as appropriate, preparation of responses, and follow-up on agreed actions. Where a grievance cannot be resolved immediately, the complainant will be

informed of its status and any further steps required. A visualisation of the Project Grievance Redress Mechanism (GRM) is provided in **Figure 3**. A template Public Grievance Form is provided in **Annex 1**.

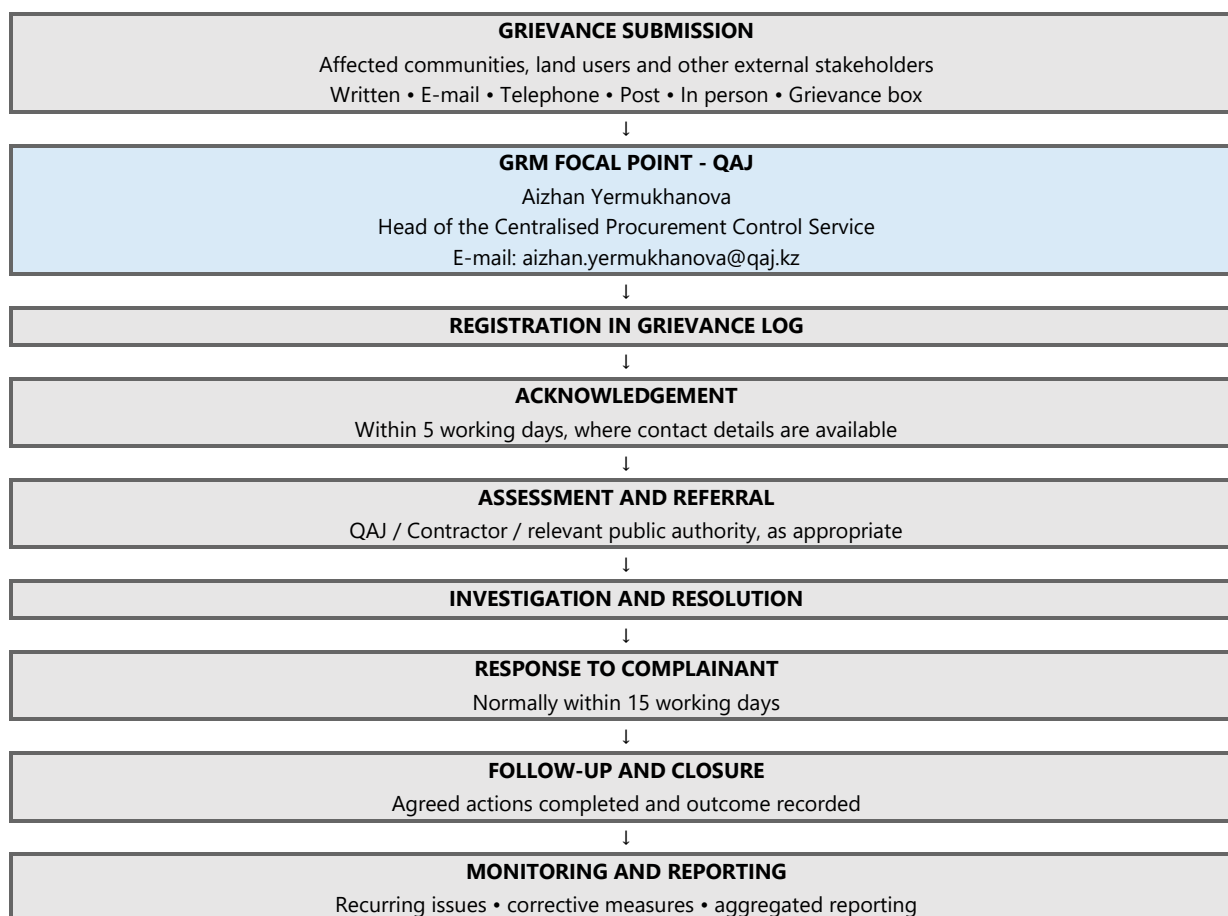


Figure 3 - Project Grievance Redress Mechanism (GRM) Flowchart

7 Monitoring and Reporting

7.1 Monitoring of SEP Implementation

Implementation of the SEP will be monitored throughout the Project lifecycle to assess whether stakeholder engagement activities are being carried out as planned and, importantly, whether the engagement methods used are effective in reaching relevant stakeholder groups and enabling them to raise their views and concerns. Monitoring results will be used to identify any gaps in engagement and to adjust the methods, frequency or focus of stakeholder engagement where necessary.

Monitoring will consider, as appropriate, the following indicators:

- number and type of stakeholder engagement activities undertaken;
- stakeholder groups participating in engagement activities;
- participation of women, vulnerable people and underrepresented groups, where relevant;
- key issues and concerns raised by stakeholders;
- number and type of grievances received;
- grievance resolution status and response times;
- implementation of commitments and follow-up actions arising from consultations; and
- updates to the SEP in response to Project developments, stakeholder feedback or identified engagement needs.

The designated SEP Focal Point will be responsible for maintaining the relevant engagement and grievance records and periodically reviewing monitoring results. Particular attention will be given to whether relevant affected parties are being effectively reached, whether stakeholders have adequate opportunities to provide feedback, and whether issues raised through consultations and the Grievance Mechanism are being appropriately addressed.

7.2 Reporting

The results of SEP monitoring will provide the basis for reporting on stakeholder engagement throughout the Project lifecycle. Information collected through the monitoring process will be periodically reviewed and incorporated into the Project's environmental and social monitoring and reporting arrangements.

Reporting will summarise the engagement activities undertaken, stakeholder groups consulted, key issues and concerns raised, grievances received and their resolution status, and progress in implementing commitments and follow-up actions arising from stakeholder engagement. Where monitoring identifies gaps or areas requiring improvement, reporting will also describe the measures taken or planned to address them.

Relevant information on Project environmental and social performance and key outcomes of stakeholder engagement will be communicated to affected parties and other interested parties, as appropriate. Public reporting will focus on matters relevant to stakeholders and actions taken by the Project in response to issues and concerns raised, while protecting personal and confidential information.

The results of monitoring and reporting will be used to inform future stakeholder engagement activities and, where necessary, to update the SEP and the Stakeholder Engagement Programme.

Annex 1. Public Grievance Form

Reference No. (for internal use only)	
Name (optional)	First name: _____ Last name: _____
Confidentiality	☐ I request that my identity and contact details are kept confidential and are not disclosed without my consent.
Contact information (optional)	Please indicate your preferred method of contact: ☐ By post. Address: _____ _____ ☐ By telephone: _____ ☐ By e-mail: _____ ☐ Other / messenger: _____
Preferred language for communication	☐ Kazakh ☐ Russian ☐ Other, please specify: _____
Organisation (optional)	_____
Location related to the grievance (if applicable)	Settlement / district / road section / other location: _____
Description of grievance, concern, comment or proposal	Please describe the issue, including relevant details: _____ _____ _____ _____
Date and frequency of the issue	☐ One-time issue. Date: _____ ☐ Occurred more than once. Please specify: _____ ☐ Ongoing / currently occurring
Requested or suggested resolution (if any)	_____ _____ _____
Supporting documents / photographs (if any)	☐ Attached ☐ Not applicable Please list: _____
Signature (optional)	Signature: _____ Date: _____

Annex 2. Stakeholder Engagement Log Template

The log should be maintained by the designated SEP Focal Point and updated following stakeholder engagement activities. It may be maintained electronically (e.g. in Excel). Personal data and confidential information should be handled in accordance with applicable requirements.

ID	Date	Location / Project section	Engagement activity / method	Stakeholder group / participants	No. of participants (women / men, where relevant)	Initiated by	Purpose / information disclosed	Key topics discussed and issues raised	Stakeholder feedback / requests	Commitments / follow-up actions	Responsible party	Target date / status	Record / MoM reference
1													
2													
3													
4													
5													
6													