

Almaty International Airport

Environmental and Social Action Plan

September 2025

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Almaty International Airport

Draft Environmental and Social Action Plan

September 2025

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	09/09/2025	Various	KD	BM	Draft report
B	15/09/2025	Various	KD	BM	Updated draft report

Document reference: 100124651 | Environmental and Social Action Plan | A

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1 Introduction

1.1 Background

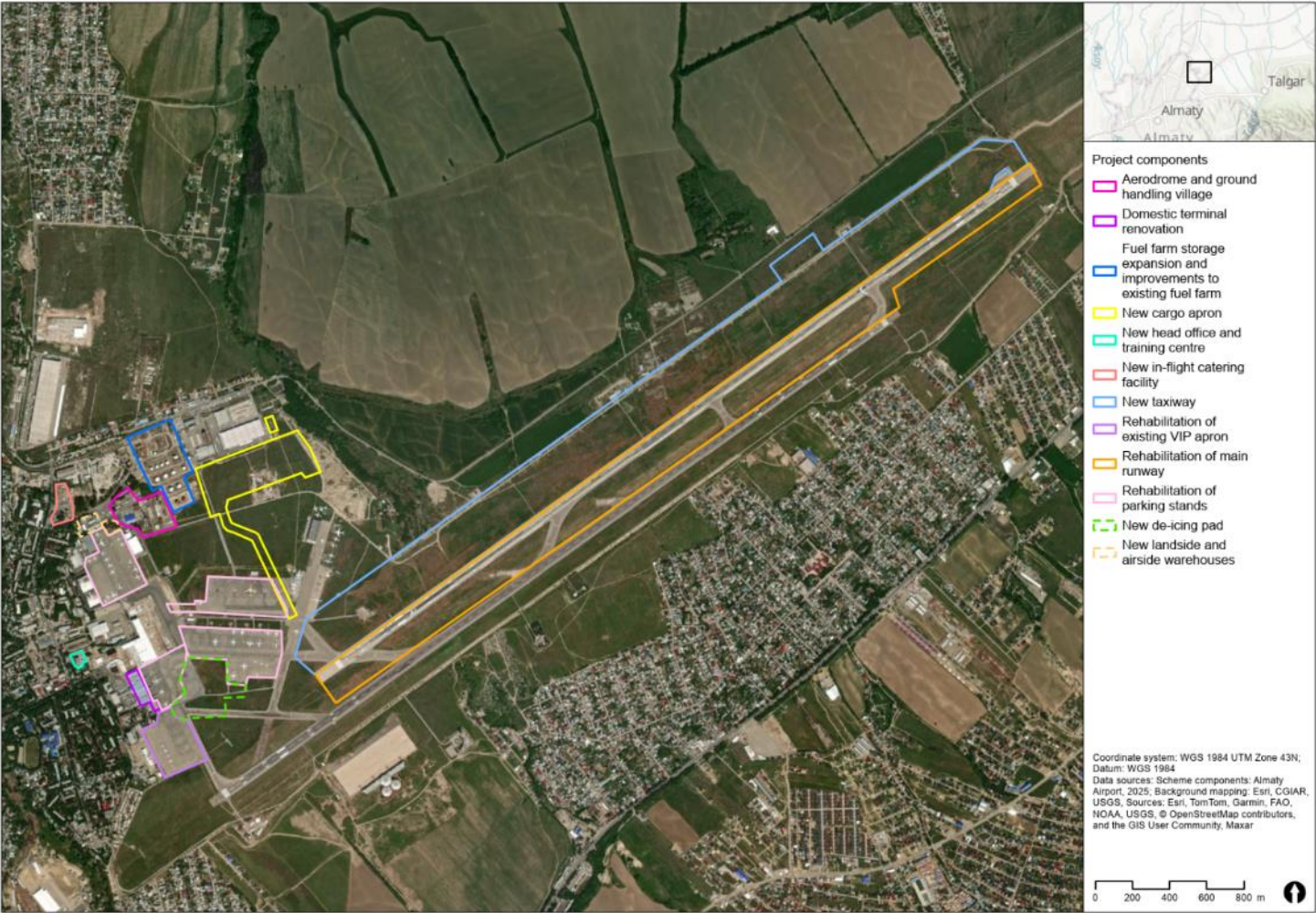
- 1.1.1 Mott MacDonald Ltd, supported by EcoSocio Analysts LLC, has been appointed by Almaty International Airport (also referred to by its airport code, ALA), located in Almaty, Kazakhstan, to deliver the Draft Environmental and Social Action Plan (ESAP) for the Project Horizon (hereafter referred to as "the Project").
- 1.1.2 Almaty International Airport is located approximately 12km to the north-east of central Almaty. ALA is the busiest international airport in Kazakhstan in terms of both passenger numbers and aircraft movements. The airport currently consists of two runways and associated taxiways, the domestic terminal building (T1), the international terminal building (T2), a VIP building, a fuel farm, hangars and workshops, and auxiliary facilities.
- 1.1.3 The International Finance Corporation (IFC), the European Bank for Reconstruction and Development (EBRD), Deutsche Investitions - und Entwicklungsgesellschaft (DEG), and the Eurasian Development Bank (EDB) (collectively referred to as "the Lenders") are considering providing finance for the Project. Accordingly, all deliverables will be prepared in alignment with the sustainability performance standards and requirements set forth by the Lenders. ALA is looking to secure funding for its capital expenditure (CAPEX) for the period 2025-2029. The main elements of expenditure involve the following developments:
- Full depth reconstruction of main runway
 - New taxiway
 - New cargo apron
 - Full depth reconstruction of existing VIP apron
 - New de-icing pad
 - Rehabilitation of parking stands
 - New in-flight catering facility
 - Fuel farm storage expansion and improvements to existing fuel farm
 - Domestic terminal (T1) renovation
 - Drainage and wastewater treatment
 - New head office and training centre
 - Aerodrome and ground handling village
 - New landside and airside warehouses
 - Other improvements
- 1.1.4 The location of the Project components can be found in Figure 1.1.

1.2 Purpose of this document

- 1.2.1 This document represents the Draft Environmental and Social Action Plan (ESAP) for the Project. It defines the corrective and enhancement measures required to align the Project with the Lender's environmental and social standards (i.e. IFC Performance Standards (PSs), EBRD Environment and Social Requirements (ESRs)), including timelines, responsibilities, and monitoring requirements.

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Figure 1.1: Project components



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2 Methodology

- 2.1.1 A Draft ESAP has been developed, which lists actions and measures required to mitigate Environmental and Social (E&S) risks and impacts associated with the Project according to the applicable standards (national and international regulations, including Lender requirements and standards).
- 2.1.2 The Draft ESAP describes the actions necessary to implement the mitigation measures identified in the Environmental and Social Impact Assessment (ESIA), including the timeline for their implementation, the responsible party, and a description of factors that will be used to determine action closure/completion.
- 2.1.3 When applicable, each action listed in the Draft ESAP is linked to the relevant management plan to ensure traceability and accountability. A comprehensive list of the Environmental and Social Management Plans (ESMPs) expected to be developed and implemented during both the construction and operational phases of the Project are presented in Table 2.1 below.

Table 2.1: ESMPs expected to be developed for the Project

Phase	Management Plan	Implemented by
Construction	Construction Environment and Social Management Plan C-ESMP <ul style="list-style-type: none"> - Standard environmental controls - Waste management plan - Hazardous materials management plan - Air quality management Plan - Noise and vibration management plan - Emergency preparedness and response plan - Traffic and transport management plan - Community health and safety plan - Occupational wellbeing health and safety plan - Labour management plan - Grievance mechanism 	EPC Contractors
Construction & Operation	Diversity and Inclusion Action Plan	ALA
Construction & Operation	Supplier-Subcontractor Management Plan	ALA
Construction & Operation	Security Management Plan	ALA
Construction & Operation	Stakeholders Management Plan	ALA
Construction & Operation	Carbon Management Plan	ALA
Operation	Wildlife Hazard Management Plan	ALA
Operation	Climate Change Adaptation and Resilience Plan	ALA
Operation	Stakeholders Management Plan	ALA
Operation	Waste Management Plan	ALA
Operation	Hazardous Materials Management Plan	ALA
Operation	Water Management Plan	ALA
Operation	Air Quality Management Plan	ALA
Operation	Noise and Vibration Management Plan	ALA
Operation	Traffic and Transport Management Plan	ALA
Operation	Community Health and Safety Plan	ALA
Operation	Occupational Wellbeing Health and Safety Plan	ALA
Operation	Emergency Preparedness and Response Plan	ALA

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Phase	Management Plan	Implemented by
Operation	Labour Management Plan	ALA
Operation	Grievance Mechanism	ALA

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3 Draft ESAP

3.1.1 The Draft ESAP is presented in Table 3.1 below.

Table 3.1: Project Horizon Draft ESAP

No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
ESR1	Assessment and Management of Environmental and Social Risks and Impacts							
1.1	Update the Environmental and Social Management System (ESMS) and associated environmental policy to integrate Project Horizon-specific impacts, risks and mitigation measures as identified in the Environmental and Social Impact Assessment (ESIA).	Risk of outdated or non-compliant systems; benefit of improved E&S risk management and stakeholder confidence.	IFC PS1 EBRD ESR1 Best Practice	ALA	31/12/2026	<ul style="list-style-type: none"> Updated ESMS and environmental policy approved by ALA, with Project Horizon-specific risks and mitigation measures integrated. 	Not started	N/A - overarching
1.2	Develop Construction Environmental and Social Management Plan (C-ESMP) aligned with Project Horizon ESIA findings	Risk of unmanaged impacts and risks during construction; benefit of proactive mitigation	IFC PS1, PS2, PS3, PS4, PS6 EBRD ESR1, ESR2, ESR3, ESR4, ESR6	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> C-ESMPs approved by ALA and integrated into EPC contracts prior to mobilisation. 	Not started	N/A - overarching
1.3	Update detailed Environmental and Social Management Plans (ESMPs) for the	Risk of unmanaged impacts during operation; benefit of proactive mitigation and improved compliance	IFC PS1, PS2, PS3, PS4, PS6	ALA	31/12/2026	<ul style="list-style-type: none"> Updated operational ESMPs approved by ALA, reflecting Project 	Not started	N/A - overarching

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	operational phase, aligned with Project Horizon ESIA findings.		EBRD ESR1, ESR2, ESR3, ESR4, ESR6			Horizon-specific risks and mitigation measures		
1.4	EPC contractors shall assign qualified E&S staff and provide role-specific training during Project Horizon construction. ALA to supervise implementation.	Risk of labour rights violations in the supply chain; benefit of ethical sourcing and reputational protection.	IFC PS1, PS2 EBRD ESR1, ESR2	ALA (supervisor)/EPC Contractors	31/03/2026	<ul style="list-style-type: none"> All EPC E&S roles filled 	Not started	N/A - overarching
1.5	Update monitoring protocols and reporting formats for Project Horizon, ensuring alignment with ESMS and inclusion of public disclosure mechanisms.	Risk of fragmented or inconsistent data; benefit of improved transparency, accountability, and decision-making	IFC PS1 EBRD ESR1, ESR10	ALA	31/03/2026	<ul style="list-style-type: none"> Monitoring protocols and reporting formats updated Public disclosure mechanisms in place and accessible 	Not started	N/A - overarching
1.6	Prepare the Environmental Impact Assessment (EIA) in accordance with Kazakhstan's Environmental Code and submit for State Environmental Expertise (SEE) review and approval. Obtain the environmental permit for Project Horizon.	<i>Risk of project delays, legal non-compliance, or reputational damage if permitting is not secured; benefit of legal compliance, improved stakeholder confidence, and project readiness.</i>	<i>Kazakhstan Environmental Code (No. 400-VI, as amended) EBRD ESR1 IFC PS1 Best Practice</i>	ALA	31/12/2026	<ul style="list-style-type: none"> EIA prepared in accordance with national requirements and submitted to competent authority Positive conclusion of State Environmental Expertise (SEE) obtained Environmental permit issued 	Not started	N/A - overarching
1.7	Develop an Extreme Weather Management	Risk of operational disruption, infrastructure	EBRD ESR1, ESR3 GIIP	ALA	31/12/2026	<ul style="list-style-type: none"> EWMP developed and integrated into 	Not started	Climate Resilience

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	Plan (EWMP) as part of the ESMP, including protocols for rainfall monitoring, food risk mapping, emergency response, and infrastructure resilience.	damage, and safety issues due to extreme weather, benefit of enhanced climate resilience and preparedness.				ESMP and approved by ALA. • Protocols in place and tested.		
ESR2 Labour and Working Conditions								
2.1	Develop contractor Occupational Health, Safety and Wellbeing Management Plan (OHSWMP), including permit-to-work procedures, based on pre-activity risk assessments.	To mitigate OHSW risks', and to ensure compliance with labour rights during construction.	IFC PS2, PS4 EBRD ESR2, ESR4 ILO 81, 155, 167 Labour code 2015	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> OHSWMPs approved by ALA and integrated into EPC contracts. Permit-to-work procedures and pre-activity risk assessments completed for all high-risk tasks. Contractor induction includes OHSWMP briefing. 	Not started	Workers
2.2	Update ALA's Occupational Health, Safety and Wellbeing Management Plan (OHSWMP), including permit-to-work procedures, based on pre-activity risk assessments.	To mitigate OHSW risks', and to ensure compliance with labour rights during operation.	IFC PS2, PS4 EBRD ESR2, ESR4 ILO 81, 155, 167 Labour code 2015	ALA	31/12/2026	<ul style="list-style-type: none"> OHSWMPs updated approved. Permit-to-work procedures and pre-activity risk assessments completed for all high-risk tasks. 	Not started	Workers
2.3	Integrate a Code of Conduct into all employment contracts for contractor staff, covering	Risk of workplace harassment, discrimination, and unsafe behaviour; benefit of improved	IFC PS2, PS4 EBRD ESR2, ESR4 ILO 81 Labour code 2015	ALA (supervisor)/ EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Code of Conduct integrated into all employment contracts and 	Not started	Workers

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	respectful workplace behaviour, anti-harassment, community interaction, and occupational standards. Ensure training and awareness for all workers.	workplace culture, legal compliance, and reputational protection.				included in the contractor induction materials.		
2.4	Include in EPC contractors contract requirement to submit monthly workforce reports covering origin, gender, working hours, overtime, wage payments, training, grievances, union activity, accommodation, OHSW statistics, retrenchment, and other relevant labour data.	Risk of non-compliance with labour standards and lack of transparency; benefit of improved oversight, early issue identification, and alignment with international standards.	IFC PS2, PS4 EBRD ESR2, ESR4 ILO 81 Labour code 2015	ALA (supervisor)/ EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Clause included in EPC Contactor's contract requiring submission of monthly workforce reports covering origin, gender, working hours, overtime, wage payments, training, grievances, union activity, accommodation, OHSW statistics, and retrenchment. 	Not started	Workers
ESR3 Resource Efficiency and Pollution Prevention and Control								
3.1	Develop dust and emissions control measures in the Air Quality Management Plan (AQMP) integrated to the C-ESMP.	Risk of nuisance and health impacts from dust and particulate emissions; benefit of improved air quality and reduced community complaints.	EBRD PR3, IFC PS3, National Air Quality Regulations	ALA (supervisor)/EPC Contractors	31/03/2026	<ul style="list-style-type: none"> AQMP integrated in the C-ESMP developed by EPCs and approved by ALA. 	Not started	Air quality
3.2	Update the operation Air Quality Management Plan (AQMP) to reflect current and future operational conditions.	Risk of deteriorating air quality and non-compliance with national standards; benefit of improved air quality, regulatory	EBRD PR3, IFC PS3, National Air Quality Standards, Best Practice	ALA	31/03/2026	<ul style="list-style-type: none"> Operation AQMP updated and approved by ALA. 	Not started	Air quality

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	The AQMP shall include prevention and control measures for fugitive emissions from fuel farm operations.	compliance, and stakeholder confidence.						
3.3	Update ALA's Water Management Plan to reflect current and future operational conditions.	Risk of contamination of surface and groundwater by accidental spills, hydrocarbons, heavy metals, suspended solids, and dust from construction works. Risk of increased water consumption and wastewater generation. Benefit of improved pollution control, water efficiency, and regulatory compliance.	IFC PS3 EBRD ESR3 National water legislation	ALA	31/12/2026	<ul style="list-style-type: none"> Operation Water Management Plan updated and approved by ALA. 	Not started	Water resources
3.4	Develop and integrate a flood risk assessment, including a Stormwater Management Plan, and hydraulic modelling to quantify fluvial and pluvial risks from the Malaya Almatinka and Kotur-Bulak Rivers. Use findings to inform drainage design and overflow planning.	Risk of inadequate drainage design and increased flood vulnerability. Benefit of improved resilience and protection of airport infrastructure and users.	IFC PS3 EBRD ESR1, ESR3 National water legislation	ALA	31/12/2026	<ul style="list-style-type: none"> Flood risk assessment completed. Stormwater Management Plan completed. Hydraulic modelling results integrated into detailed design. Overflow and resilience measures incorporated. 	Not started	Water resources

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
3.5	Develop construction-phase Noise and Vibration Management Plan (NVMP) integrated into the C-ESMP.	Risk of significant noise impact at AP89; benefit of reduced disturbance and improved community relations.	EBRD ESR3 IFC PS3, BS 5228 Kazakhstan National Noise Standards	ALA (supervisor) / EPC Contractors	31/03/2026	<ul style="list-style-type: none"> NVMP integrated in the C-ESMP developed by EPCs and approved by ALA. 	Not started	Noise
3.6	Update the existing operational Noise Management Plan (NMP).	<i>Risk of moderate to major adverse impacts at high-sensitivity receptors; benefit of improved health outcomes, regulatory compliance, and stakeholder confidence.</i>	EBRD ESR3 IFC PS3 WHO Guidelines ICAO Balanced Approach	ALA	31/03/2026	<ul style="list-style-type: none"> Operational NMP updated and approved by ALA 	In progress	Noise
3.7	Develop the Waste Management Plan (WMP), integrated to the C-ESMP.	Improper waste handling during construction poses risks of soil and water contamination, air pollution, and nuisance impacts on nearby communities. It may also result in non-compliance with national legislation and lender requirements, leading to reputational and financial liabilities.	IFC PS3 EBRD ESR3 Legislative (Environmental Code of the Republic of Kazakhstan, 2021) IFC General EHS guidelines 2007a IFC EHS guidelines for Waste Management Facilities 2007b IEMA guidance 2020 Best Practice	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Waste Management Plan integrated in the C-ESMP developed by EPCs and approved by ALA. 	Not started	Waste
3.8	Update ALA's Operational Waste Management Plan compliant to applicable legislation.	While ALA has existing waste management practices, long-term operation presents ongoing risks such as improper segregation, unauthorised disposal, and environmental nuisance near sensitive receptors. These can lead	IFC PS3 EBRD ESR3 Legislative (Environmental Code of the Republic of Kazakhstan, 2021)	ALA	31/12/2026	<ul style="list-style-type: none"> Operation Waste Management Plan updated and approved by ALA. 	Not started	Waste

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
		to regulatory non-compliance, reputational damage, and increased operational costs.	IFC General EHS guidelines 2007a IFC EHS guidelines for Waste Management Facilities 2007b IEMA guidance 2020 Best Practice					
3.9	Develop the Hazardous Materials Management Plan (HMMP), integrated to the C-ESMP.	Improper handling and storage of hazardous materials can lead to soil and water contamination, fire hazards, and health risks for workers and nearby communities. These impacts may result in regulatory penalties, reputational damage, and increased liability.	IFC PS3 EBRD ESR3 Legislative (Environmental Code of the Republic of Kazakhstan, 2021) IFC General EHS guidelines 2007a IFC EHS guidelines for Waste Management Facilities 2007b IEMA guidance 2020 Best Practice	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Hazardous Materials Management Plan integrated in the C-ESMP developed by EPCs and approved by ALA. 	Not started	Hazardous materials
3.10	Update the operation Hazardous Material Management Plan.	Improper handling and storage of hazardous materials can lead to soil and water contamination, fire hazards, and health risks for workers and nearby communities. These impacts may result in regulatory penalties,	IFC PS3 EBRD ESR3 Legislative (Environmental Code of the Republic of Kazakhstan, 2021)	ALA	31/12/2026	<ul style="list-style-type: none"> Operational Hazardous Materials Management Plan updated and approved by ALA. 	Not started	Hazardous materials

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
		reputational damage, and increased liability.	IFC General EHS guidelines 2007a IFC EHS guidelines for Waste Management Facilities 2007b IEMA guidance 2020 Best Practice					
3.11	Update Spill Prevention plan and Emergency Preparedness and Response Plan (EPRP) for hazardous material management during operation.	To reduce health and safety hazards due to inappropriate handling and storage of waste particularly hazardous waste.	IFC PS3 IFC PS4 EBRD ESR3 EBRD ESR4 Best practice	ALA	31/12/2026	<ul style="list-style-type: none"> Spill Prevention Plan and EPRP for hazardous material management updated and approved by ALA. 	Not started	Hazardous materials
3.12	Finalise and implement fuel farm upgrade measures in line with GIIP, including spill prevention, air emissions, fire safety, and OHS.	Risk of pollution, fire, and health impacts; benefit of improved safety and compliance.	IFC PS3 IFC PS4 EBRD ESR3 EBRD ESR4 Best practice	ALA	31/03/2026	<ul style="list-style-type: none"> Implementation of agreed measures and approved action plan 	In progress	Contaminated land
3.13	Prepare and implement a time-bound, costed, remedial action plan for contaminated soil and groundwater, based on investigation results.	Risk of environmental liability and regulatory non-compliance.	IFC PS3 IFC PS4 EBRD ESR3 EBRD ESR4 Best practice	ALA	30/09/2025	<ul style="list-style-type: none"> Remedial action plan submitted and approved. Implementation initiated and tracked against agreed schedule and budget. 	In progress	Contaminated land
3.14	Integrate Soil Protection into C-ESMP including Emergency Preparedness and	Construction activities can cause accidental soil contamination. Integrating soil protection and	IFC PS3 IFC PS4 EBRD ESR3	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Soil protection and emergency response procedures 	Not started	Contaminated land

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	Response Plan (EPRP) procedures for soil contamination incidents and embed soil protection measures.	emergency response into the CESMP helps prevent incidents, ensures rapid response, and reduces environmental and regulatory risks	EBRD ESR4 Best practice			included in C-ESMP by EPCs and approved by ALA.		
3.15	Develop a GHG Management Plan for the construction phase, including low-carbon materials, efficient equipment use, grid electricity, and emissions tracking.	Risk of elevated GHG emissions during construction; benefit of reduced embodied and operational carbon.	EBRD ESR3 GIIP	ALA	31/03/2026	Construction phase GHG management plan developed and integrated into C-ESMP.	Not started	GHG
3.16	Develop a GHG Management Plan for the operation phase, including electrification of ground operations, renewable energy sourcing, building energy efficiency, and SAF promotion.	Risk of long-term GHG emissions from airport operations; benefit of improved energy efficiency and reduced carbon footprint.	EBRD ESR3 GIIP	ALA	31/12/2026	Operational phase GHG Management Plan completed and approved by ALA. Annual GHG inventory and reduction targets established. SAF promotion strategy developed.	Not started	GHG
ESR4 Health, Safety and Security								
4.1	Develop and implement the Traffic Management Plan (TMP) integrated to the C-ESMP.	Risk of increased traffic congestion, accidents, and community disruption; benefit of safer roads, reduced nuisance, and improved stakeholder relations.	Best Practice IFC PS4 EBRD ESR4 IFC EHS Guidelines for Airports	ALA (supervisor)/EPC Contractor	31/03/2026	<ul style="list-style-type: none"> Construction TMP developed and approved by ALA prior to contractor mobilisation. TMP integrated into C-ESMP and contractor induction materials. 	Not started	Traffic and transport

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	security risks through international-standard emergency preparedness, fire and fuel safety systems, wildlife and runway hazard controls, and updated airport security protocols.					and approved by ALA. • Security system design documents completed for new Project areas.		
4.6	Work with the Intergovernmental Working Group to establish the Sanitary Protection Zone (SPZ) and Public Safety Zone (PSZ) for Almaty Airport, subject to enabling legislative amendments and completion of required monitoring. ¹	<i>Protection zones are critical to safeguard community health and safety, manage land use, and prevent future conflicts. The SPZ related solely to sanitary and environmental protection requirements and does not cover operational safety risks associated with aircraft movements, which are addressed under separate aviation safety regulations and the prospective PSZ.</i>	EBRD ESR4 IFC PS4 RoK Construction Law RoK Health and Aviation Regulations	ALA ²	31/06/2026 ³ , subject to suitable progress from stakeholders	<ul style="list-style-type: none"> Evidence of initiation of SPZ and PSZ establishment process, including engagement with authorities and commencement of monitoring activities Proactive coordination and collaboration with governmental authorities towards the establishment of an SPZ/PSZ 	In progress	Community
4.7	Implement measures and/or design change required following the Quantified Risk	Risks to workers and community from major accidents at the fuel farm	EBRD ESR4	ALA	Design alterations prior to the commencement	<ul style="list-style-type: none"> Evidence of design changes 		N/A

¹ This action is contingent on amendments to the relevant legislation that would allow establishment of the SPZ with existing residential areas included. Submission of the SPZ design may be delayed accordingly.

² ALA in coordination with the Committee for Sanitary and Epidemiological Control of the Ministry of Health of the Republic of Kazakhstan.

³ Tentative deadline. Assumed within the quarter following the effective date of relevant legislative amendments.

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No.	Action	Environmental & social risks (liability / benefits)	Requirement (legislative, EBRD ESR, best practice)	Resources / responsibility	Timetable	Target and evaluation criteria for successful implementation	Status	Relevant Chapter of ESIA
	<i>Assessment of the fuel farm.</i>				<i>ent of construction</i> <i>Operational measures as set out in the QRA Report</i>	<ul style="list-style-type: none"> <i>Report on implementation of measures</i> 		
ESR5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement Performance requirement not triggered by Project Horizon. Project Horizon is located within the existing operational boundary of Almaty International Airport (ALA), with limited exceptions (e.g. new head office and training centre, and a small parcel for the new taxiway). No additional land acquisition or displacement is required for the Project. A Land Acquisition and Resettlement Framework (LARF) prepared under the Original Deal remains applicable to ALA's operations. If future land acquisition or displacement occurs, it will be addressed in line with the LARF and IFC PS5 / EBRD PR5. Existing ESAP actions cover SPZ/PSZ establishment, avoidance of displacement, preparation of Resettlement Plans if needed, and quarterly stakeholder engagement.							
ESR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources ESR6 not triggered, as no critical habitats or biodiversity-sensitive areas are affected by the Project Horizon. Mitigation measures for construction and operation are ongoing and integrated into the C-ESMP and ESMP. No standalone biodiversity actions are required.							
ESR7	Indigenous People ESR not applicable. No indigenous communities have been identified in the vicinity of the airport.							
ESR8	Cultural Heritage ESR not applicable. No construction or operational impacts on the relocated VIP terminal, the historic landscape, or buried archaeology are anticipated.							
ESR10	Stakeholder engagement							
10.1	Finalise and disclose the updated SEP. Ensure it is reviewed and updated regularly during construction and operation phases, with documentation of engagement activities maintained.	To guide ongoing, transparent communication with interested and affected parties, especially neighbouring communities.	IFC PS1 EBRD ESR10	ALA	31/12/2025	<ul style="list-style-type: none"> Updated SEP finalised and disclosed. 	In progress	Community

