



Almaty International Airport

Environmental and Social Impact Assessment
Report - Chapter 15

September 2025

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Mott MacDonald
10 Fleet Place
London EC4M 7RB
United Kingdom

T +44 (0)20 7651 0300
mottmac.com

Almaty International Airport

Environmental and Social Impact Assessment Report - Chapter 15

September 2025

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Acronyms and abbreviations

Abbreviation / Acronym	Definition
ALA	Almaty International Airport
ATM	Air Traffic Movements
E&S	Environment and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environment Health and Safety
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESR	Environment and Social Requirements
FIDIC	Fédération Internationale Des Ingénieurs-Conseils (International Federation of Consulting Engineers)
GBV	Gender-based violence
GIIP	Good International Industry Practice
HR	Human Resources
HSE	Health, Safety and Environment
IFC	International Finance Corporation
ILO	International Labour Organisation
NGO	Non-governmental organisation
OHS	Occupational Health and Safety
OHSW	Occupational Health, Safety and Wellbeing
PPE	Personal Protective Equipment
PS	Performance Standards
TU	Trade Union

15 Workers

15.1 Introduction

- 15.1.1 This chapter of the Environmental and Social Impact Assessment (ESIA) presents the baseline description and the findings of the assessment of the likely significant environmental effects on workers as a result of the Project.
- 15.1.2 An assessment of likely significant effects has been undertaken for each of the sensitive receptors identified in the study area. Where necessary, commitments to mitigation measures have been outlined to manage any impacts on receptors.
- 15.1.3 This chapter assesses how workers at Almaty International Airport (ALA) may be affected as a result of the Project in terms of the way they work and interact with one another on a day-to-day basis. Social impacts considered include those related to employment generation, labour and working conditions, and risks to the wellbeing and health and safety of ALA employees (direct workers), contractors' workers, and supply chain workers, recognising the different policies governing each of these categories of workers.

15.2 Methodology

Applicable guidelines and standards

- 15.2.1 The assessment has been undertaken considering relevant legislation, standards, and guidance as summarised in the sections below. **ESIA Chapter 3: Policy, legal and institutional framework** outlines these relevant guidelines, however when addressing international standards from the prospective Lenders, this chapter will focus primarily on those related to labour aspects:
- International Finance Corporation (IFC) Performance Standards (PS)
 - PS1 – Assessment and Management of Environmental and Social Risks and Impacts
 - PS2 – Labor and Working Conditions
 - PS4 – Community Health, Safety and Security
 - The Environment and Social Requirements (ESR) of the European Bank for Reconstruction and Development (EBRD):
 - ESR1 – Assessment and Management of Environmental and Social Risks and Impacts
 - ESR2 – Labor and Working Conditions
 - ESR4 – Health, Safety and Security
 - International Labour Organisation (ILO) Conventions. Kazakhstan has ratified 25 core labour standards including C029 Forced Labour Convention, C087 Freedom of Association and Protection of the Right to Organise Convention, C098 Right to Organise and Collective Bargaining Convention, C100 Equal Remuneration Convention, C105 Abolition of Forced Labour Convention, C111 Discrimination, C138 Minimum Age Convention, C155 Occupational Health and Safety Convention, C182 Worst Forms of Child Labour Convention, C187 Promotional Framework for Occupational Safety and Health. The obligations under these conventions are implemented in national legislation.
 - Legal Framework: Labour Code, 2015
- 15.2.2 There is some overlap with the **ESIA Chapter 8: Community**. However, to prevent duplication, this chapter focuses on human (labour) activities, impacts and risks within the airport boundary

while **ESIA Chapter 8: Community** covers human and social aspects outside the airport boundary.

Area of influence

- 15.2.3 The study area for this assessment is outlined in Figure 15.1, and considers the area of influence for where labour and work-related impacts and risks may be experienced during the construction and operational phases. Potential impacts and risks are identified for construction, which is estimated to take place for three years, and for operation, once the Project is complete and ALA experiences a growth of air and passenger traffic.

Figure 15.1: Workers' assessment study area



Source: YDA Accommodation Plan, 2025

Methodological approach

- 15.2.4 This chapter has the objective of safeguarding workers by preventing or avoiding adverse impacts and risks. The assessment methodology aligns with the approach used in **ESIA Chapter 8: Community**, applying the same criteria for evaluating magnitude and receptor sensitivity. This analysis has been based on secondary data sourced from desktop reviews of existing Project documentation, relevant environmental and social studies, and publicly available information from national and local government bodies, as well as non-governmental organisations (NGOs).

Limitations and assumptions

- 15.2.5 Current workforce data for ALA has been reviewed and incorporated into the assessment. However, projections for the future operational workforce, as well as up-to-date statistics on the construction sector workforce in the Almaty Region, are not publicly available. This limits the ability to fully assess long-term employment trends and cumulative labour-related impacts associated with the Project and other regional developments.

15.3 Baseline

Kazakhstan construction sector

- 15.3.1 The local construction sector is growing fast both in Almaty and Almaty Oblast, at a rate of 121% and 117%, respectively, in 2019. At that time there were more than 1,208 construction organisations in Almaty and almost 150 construction businesses operating. Most construction operations in the region are private small and medium size businesses. According to national statistics, as of 2020, the 148 construction businesses in Almaty provided employment for approximately 48,069 people. While this remains the most recent employment-specific data available, more recent figures from 2023¹ indicate that the sector's output has continued to expand, with construction volumes in Almaty reaching 605.9 billion tenge (KZT) - an increase of 2.4% from the previous year. The construction sector of Almaty is mainly focusing on residential and non-residential buildings (like offices, sports, health and recreation facilities, hotels and restaurants, schools and education buildings, etc.) whereas the construction businesses in Almaty Oblast are mainly engaged in construction of roads and highways, non-residential buildings as well as assembling and installation operations.

ALA employees

- 15.3.2 As of 2025, ALA employed 4,189 operational staff. Of the 4,189 employees, 2,292 are definite contracts and 1,897 are indefinite contracts. It is anticipated for the construction phase of the Project that a further 426 contracted workers will be required.
- 15.3.3 The operational staff functions include operation and maintenance of the airport and ground facilities, airfield servicing, managing flight safety for international and domestic air traffic, ornithological services, handling of luggage, cargo and mail, managing payload of aircrafts, provision of ground service for passengers, first aid and medical services for operational staff and passengers, operation of checkpoints and IT systems, security and video control, support of information enquiries and bookings, aviation staff training and improvement of skills.
- 15.3.4 Of the total staff from 2023, 116 people were parents with large families, while 35 people (1.9%) were disabled from working groups 2 and 3. People having disability group 2 (moderate disability) and 3 (mild disability) may work:
- Group 2: These disabled employees have a reduced working day (maximum 36 hours per week), do not work at hazardous workplaces, and have additional paid annual leave of 15 calendar days.
 - Group 3: These disabled employees are not restricted from employment but may need some adjustments based on medical recommendations. Employers must consider medical advice before assigning tasks.
- 15.3.5 The labour legislation sets out quotas for the share of people with disabilities in companies. As ALA employs over 250 people, employees with disabilities should make up 2-4% of the total staff. This target is not yet met by ALA (people with disabilities account for 1.9% of total staff in ALA). Any dismissals on grounds of disability are not allowed by law in Kazakhstan and such actions may lead to criminal liability. However, the labour agreement may be terminated with the disabled worker if the state of health does not allow for such worker to perform the labour functions in the relevant profession or may threaten the health of other people. In such a case an opinion from a specialist medical commission is to be sought before proceeding with the termination. On the other hand, a disabled worker may be made redundant on the same

¹ On the execution of construction work and commissioning of facilities in the Republic of Kazakhstan (2023)

grounds as any other employee if retrenchment begins or if qualification is not sufficient or there are other grounds as set out in Article 52 of Kazakhstan's Labour Code.

- 15.3.6 As ALA is a large-scale employer it is subject to regular labour inspections. The only concern raised during such inspections in 2022 was regarding inspectors in the Aviation Safety Service who all did the same type of work but were paid differently according to their classification status. The notice was taken into consideration, classification was abandoned, and they then began receiving equal pay. ALA promotes collective bargaining and protection of workers' rights. A Trade Union (TU) Committee operates in ALA and 99% of employees are TU members and joined the Collective Agreement. As of 2025, ALA have undertaken a benchmarking exercise and are in the process of implementing a salary review and job title matrix to ensure equality of pay.
- 15.3.7 The Collective Agreement also establishes a grievance mechanism that is managed by the TU Committee. The most often cited complaints are regarding low pay. Complaints are voiced to the TU committee but there have been no written complaints in the last decade. The last written complaint was raised in respect of the quality of the workwear and was addressed avoiding reoccurrence.

Table 15.1: Summary of labour related grievances listed in the grievance mechanism from 2022-2025

Grievance	Resolution
Parking ALA employees parking on local residents' yards. Employees parking in residential areas.	Availability of shuttle buses covering six routes to Almaty and Almaty Region, to encourage employees to not rely on private vehicles and therefore decrease parking in the local proximity of the airport.
Waste Garbage dumped in local vicinity of ALA and in local residents' yard's where employees are parking. Waste is being dumped at Kyzyltu.	ALA installed a barrier gate to prevent people dumping waste within ALA territory. Further investigation is required regarding the dumping of waste and engagement with Akimat.
Working conditions Working conditions and facilities fail to meet basic standards including the provision of a toilet, hygiene standards. Concerns raised on the screening room and making this more private for employees. Improve conditions for employees with disabilities. Refuelling equipment does not meet international technical requirements, causing inefficiencies.	Management conducted a tour of the hangar to highlight the future project and where changes will be made. Works completed to improve conditions of the screening room. Plans to hire additional staff to provide assistance to those with disabilities. Reports to management were made regarding the refuelling equipment and in some instances new equipment was provided.
Pay increases Requests to raise salaries to meet international standards.	All employee wages were raised by 20%.

ALA workforce policies

- 15.3.8 ALA has a range of policies relating to their workforce and employment conditions. As part of Groupe ADP, the majority of these align with international standards on non-discrimination and equal opportunities, prohibition of child and forced labour, occupational health and safety (OHS) and training and professional development. All ALA employees will be subject to these policies. Contractors will have policies for their own employees (the contracted workers) which are in line with the Kazakhstan Labour Law, the ESR2, and ILO core labour conventions that Kazakhstan has ratified (refer to the methodology section) covering freedom of association and collective

bargaining, elimination of forced and child labour, elimination of discrimination, and occupational health and safety.

- 15.3.9 Section 9.3 of the ALA's Human Resources (HR) Policy outlines that employees may not be subject to discrimination in the exercise of labour rights based on origin, social, official and property status, gender, race, nationality, language, attitude to religion, belief, place of residence, age or physical disabilities as well as belonging to public associations. Section 9.5 of the ALA HR Policy outlines that ALA are committed to ensuring that women are not discriminated against, and that women are supported to take full advantage of opportunities on an equal basis with men.
- 15.3.10 The minimum age for a contract of employment established by the Labour Law is 16 years. In the event of completion of secondary education or leaving a comprehensive educational establishment, persons who have reached the age of 15 with written consent of their parents (tutor, guardian) can also be employed. A student may also be contracted to perform some light work, that is not harmful to their health and not interfering with their studies in their free from learning time. To be admitted to such work, a person must be 14 years of age and have the consent of a parent, tutor or guardian. Employment of persons under the age of 18 for heavy manual work and work involving harmful and/or dangerous conditions of labour is forbidden by the Labour Law.
- 15.3.11 Forced Labour is work or service which is extracted from a person under the menace of a penalty and for which the person has not volunteered. Common indicators of forced labour that appear in the construction industry include recruitment deception, isolation or restriction of movement from employer provided accommodation, retention of identity documents, intimidation and threats, late or incorrect wage payment, excessive overtime, debt bondage (from forwarding too much future salary), and abusive working conditions. The Kazakhstan Constitution guarantees basic rights, including freedom from forced labour. The Labour Code regulates labour safety, and the Penal Code criminalises human trafficking.
- 15.3.12 ALA has policies in place relating to child and forced labour risks, however they only cover direct workers. These policies are expected to be passed to contractors, subcontractors and within the primary supply chain.
- 15.3.13 The ALA HR Policy covers sexual harassment, grievance mechanisms, and other employment processes. Training is required for all new members of staff. A digital survey of workers in 2023 revealed that 78% of ALA respondents said that they were aware of the HR Policy and 55% of respondents said they were familiar with the content of the HR Policy. Only 48% of ALA employees said they had access to a copy of the HR Policy. In 2023 new policies were introduced regarding bonus payments, ethics, and code of conduct.
- 15.3.14 ALA has disclosed publicly its grievance mechanisms for workers and the community setting out the grievance submission process and how the grievance will be handled. Previous grievances raised by the workforce in 2023 and 2024 at ALA include grievances around repairing and upgrading working spaces, and conditions for the workforce to take a break, alongside requests for wage increases.
- 15.3.15 Section 8.1 of the HR Policy outlines that the Company provides a safe and healthy working environment, taking into account inherent risk in the airport construction sector and specific classes of hazards in airport construction, including physical, chemical, biological and radiological hazards and specific hazards to women. ALA also follows Health, Safety and Environment (HSE) regulations regarding accidents and investigation management. The records of fatalities and injuries are properly maintained and documented.
- 15.3.16 The ALA Training, Retraining and Professional Development policy states ALA's commitment to providing equal opportunities for professional growth and development irrespective of gender.

The ALA HR Policy outlines ALA's clear commitment to hiring and promoting the best employees without consideration of their age, race, gender, religion, creed or nationality. It is understood that the Training Policy was updated at the end of 2024 to include diversity and inclusion topics. All ALA employees, including contracted workers, will be subject to ALA policies including the Training Policy.

Contractor management

- 15.3.17 ALA will be using a FIDIC contract for the construction works. FIDIC is the acronym for the International Federation of Consulting Engineers and its French name *Fédération Internationale Des Ingénieurs-Conseils*, which is a good international industry practice type of contract. FIDIC contracts protect labour rights primarily by mandating adherence to applicable laws, requiring adequate and timely payment to contractors and subcontractors, and providing for insurance for the contractor's personnel. While labour rights are not explicitly detailed, contract clauses on compliance with laws, financial arrangements, and insurance help promote fair treatment and safety for workers. In terms of consequences of non-compliance, if a contractor persistently violates labour laws or fails to meet payment obligations to workers, it can be considered a default, allowing the employer to terminate the contract.
- 15.3.18 The particular conditions of the contract also reference the IFC and EBRD environment and social (E&S) policies which also have performance standards and requirements for labour management and working conditions to cover direct, contracted and primary supply chain workers. As part of the ADP Group subsidiaries, ALA complies with the Group Code of Conduct², which covers all employees, as well as third parties, including their suppliers, partners, and customers, to work ethically and legally. Also, ALA complies with TAV's Supply Chain Policy³.
- 15.3.19 Provision of international funding comes with specific needs for internal and independent monitoring of E&S performance, including for labour. Each company will be required to monitor its own working conditions, the main contractors will monitor labour management and working conditions of their subcontractors and service providers. ALA staff will also monitor the labour management and working conditions of contracted workers. Independent E&S monitors will be contracted to visit site regularly throughout the construction activities to verify the monitoring results.

Comparison of Kazakh labour laws and international labour standards

- 15.3.20 Kazakhstan's labour laws show partial alignment with International Standards such as the ILO. Below indicates where Kazakhstan's labour laws align with International Standards:
- **Employment contracts:** The law mandates formal employment contracts and outlines procedures for termination.
 - **Working hours and rest breaks:** Standard working hours are 40 hours per week, typically spread over five eight-hour days. Employees are entitled to rest and have meal breaks of at least 30 minutes which are not counted as part of working time. Overtime must be agreed upon in advance with the employer, except for in emergency circumstances. Overtime is limited to a maximum of two hours per day.
 - **Antidiscrimination:** Kazakhstan's labour law prohibits discrimination across key employment areas, including hiring, promotion, compensation, and termination.

² [policy-ethics-compliance_c884f6ab-e7df-4627-9cc6-e3cf3b78e7f3.pdf](#) and [Code de conduite Anglais 2023](#)

³ [policy-supply-chain-policy_9533710a-f994-40c3-a19c-8d1762028dd1.pdf](#)

- **Workplace safety standards:** Employers are required to conduct risk assessments and provide protective equipment, ensuring compliance with international occupational health and safety standards.
- **Dispute resolution mechanisms:** The law provides multiple methods for resolving labour disputes to support a fair and accessible resolution process for all.

- 15.3.21 Kazakhstan's labour legislation demonstrates broad alignment with key principles of IFC PS2 and EBRD ESR2, particularly in its foundational protections for workers. The Labour Code mandates written employment contracts, regulates working hours and rest periods, and prohibits child and forced labour, core requirements under both international standards. Provisions for occupational health and safety are established, with legal obligations for employers to ensure safe working conditions, which aligns with the general duty of care expected under PS2 and ESR2. Additionally, Kazakhstan law includes basic anti-discrimination clauses and recognises the right to collective bargaining, reflecting the international emphasis on fair treatment and freedom of association. While implementation and enforcement challenges remain, the legal framework provides a solid basis for compliance with many of the structural expectations of lenders.
- 15.3.22 The table below identifies gaps in national and regional labour laws within Kazakhstan, or where insufficient information is available to determine if these laws are implemented. The analysis includes a gap summary and risk assessment of how ALA's labour-related policies align with these legal provisions and with the PS2 and ESR2 requirements, highlighting areas where Kazakhstan's legal framework diverges from international lender expectations on labour and working conditions.

Table 15.2: High level gap analysis between Kazakhstan labour laws and PS2/ESR2 and ALA's HR policies

Topic	Kazakhstan Labour Law	IFC PS2 / EBRD ESR2	Gap summary and risk assessment
Written Employment Contracts	Required, but not always comprehensive or consistently enforced	Mandatory, with clear terms on wages, hours, benefits, and rest periods	There are gaps in regional standards including, consistency, clarity, and accessibility of contracts whereas ALA has written employment contracts.
Occupational Health & Safety	Covers physical safety; mental health is minimally addressed	Requires safe working conditions; psychosocial risks encouraged to be addressed	Limited mental health provisions; psychosocial risks not systematically managed both regionally and at ALA.
Sexual Harassment Protections	No specific law; draft legislation exists	Requires non-discrimination and grievance mechanisms	Lack of legal protection and formal procedures regionally and at ALA.
Child and Forced Labour	Prohibited, but enforcement can be weak	Strictly prohibited; includes due diligence on recruitment practices	Enforcement and monitoring mechanisms may be insufficient regionally. ALA has no workers under the age of 18.
Grievance Mechanisms	Not systematically required or implemented	Mandatory, accessible, and transparent grievance systems	Absence of formal, accessible grievance procedures regionally. At ALA, there is a formal grievance process, however there may be gaps in the management of the grievances and

Topic	Kazakhstan Labour Law	IFC PS2 / EBRD ESR2	Gap summary and risk assessment
			completion of these complaints.
Equal Opportunity & Non-Discrimination	Basic anti-discrimination laws exist	Requires proactive policies and fair employment practices	Limited scope and enforcement of non-discrimination protections regionally. ALA have a commitment to non-discrimination but limited scope on protections and enforcement.
Supply Chain Labour Standards	Not covered	Requires assessment of labour risks in primary supply chain	No legal requirement to assess or manage supply chain labour risks regionally and there is limited scope available to determine this for ALA.
Monitoring & Enforcement Capacity	Limited inspection authority and resources	Requires effective monitoring and compliance systems	Weak enforcement infrastructure and capacity regionally and at ALA.

15.4 Potential impacts

15.4.1 Below is a summary of the identified potential impacts on workers during both the construction and operational phases of the Project. These impacts are assessed in more detail below within Section 15.5.

Construction

- Increase in temporary employment opportunities during the construction phase
- Occupational health, safety and wellbeing risk to construction workers
- Potential influx of non-local workers during construction
- Increase in noise, dust and construction related traffic with potential risk of impacts on the workplace environment for existing workers

Operation

- Increase in permanent employment during the operational phase
- Occupational health, safety and wellbeing risk to operational workers

15.5 Assessment of effects

15.5.1 This section presents the assessment of labour impacts and risks for the construction and operational phases. As mentioned in **ESIA Chapter 8: Community**, an impact is an economic, social, environmental, and other consequence that can be reasonably foreseen and measured in advance if a proposed action, such as project construction, is implemented. An environmental and social risk is an uncertain event of unknown probability. The risks identified below, namely occupational health and safety, and security and wellbeing of construction and operational workers are informed by an assessment of the contextual elements that will contribute to the risks. Significance is not attributed to the risks but management measures, in particular preventative actions, are identified.

Construction phase effects

Temporary employment opportunities

- 15.5.2 **ESIA Chapter 2: Project description** identifies the fourteen components that are part of the Project. Various engineering, procurement and construction (EPC) contractors will be required. To date YDA, an international construction company based out of Turkey, has been appointed to act as the EPC Contractor for the runways, aprons de-icing pad and parking stands. YDA's construction works for the Project are anticipated to start shortly and to be completed by the end of 2028, using the full 30-month construction phase as outlined in **ESIA Chapter 2: Project description**. Their work covers the longest period. The other EPCs will be appointed in the coming months and will have smaller parcels of work.
- 15.5.3 The majority of construction work for all the EPCs will not take place in areas that are accessible to the public. The EPC contractors will be contractually required with appropriate method statements to adhere to national laws and good international industry practice.
- 15.5.4 Currently YDA is planning that 426 workers will be required for their construction activities. Of these jobs, 360 (85%) will be locally sourced workers residing within the Almaty Region. The number of construction workers required by other EPCs is currently unknown but could be a similar total.
- 15.5.5 Normal working hours in Kazakhstan are eight hours per day with one-hour lunch breaks, working 08:00 to 17:00 Monday to Friday. If special activities are required to take place outside of those hours these situations need to be agreed with the relevant authorities in advance on a case-by-case basis. Night-time working on site will not be allowed except for transportation of the main equipment.
- 15.5.6 A key social effect will be the provision of income for workers and their families contributing to their wellbeing and enhancing their quality of life. Whereas migrant or international workers (for instance from other parts of the country or, for YDA, from Turkey) will tend to send remittances to their families thereby injecting money into other localities, the local jobs will contribute to the economic development in the Project's direct and wider social areas of influence.
- 15.5.7 This impact is expected to be **minor** in magnitude as approximately 360 up to 700 temporary jobs for the workforce are made available during construction for a period of three years. As Almaty City and Almaty Region is a thriving metropolis, the amount of construction jobs is not considered large. The sensitivity of construction workers is considered **medium** as construction workers living in urban environments may have access to alternative employment opportunities and the magnitude is **minor** because of the number and duration, which would result in a **minor beneficial (not significant)** impact.

Risks to workers' occupational health, safety and wellbeing (OHSW), and labour rights during construction

- 15.5.8 Local construction workers will most likely be employed based on fixed-term labour contracts related to the duration of the works by contractors, sub-contractors, and service providers.
- 15.5.9 The principal living arrangements will be for local workers to stay in their own homes. A smaller number (currently known to be 15% of YDA workers who are non-local i.e. national or international), will rent accommodation. Currently YDA does not anticipate building a camp for accommodating workers, rather its plan indicates it will rent accommodation in an area approximately 10km from the Project site for its international staff. The decision to use rented housing is based on the Project taking place in a large population centre with good quality housing stock and the capacity of the urbanised environment and infrastructure to assimilate this new workforce.

- 15.5.10 The ability for the majority of the YDA workforce to live in their own homes and with their own families is preferable to workers. It allows construction work to begin immediately and avoids accommodation not being ready on time such that workers need to move around or make their own rental arrangements which has can lead to anti-social behaviour⁴. As well, in this case, because of the size of Almaty, it also avoids making undue increased demands on local infrastructure, services and utilities, or contributing to inflation in local rent and other subsistence items with detrimental consequences for the local population.
- 15.5.11 The construction sector does present some potentially adverse risks to workers related to their terms of engagement and relationships with their employers. Employment risks may be associated with the following: insufficient, late or non-payment of wages; use of excessive overtime; lack of contract or insufficiently documented contract conditions; poorly managed end of contract terminations; and non-payment at the end of the construction phase. There are also risks of mistreatment by management, failure for companies to adequately respond to worker grievances, and risks for international workers in regards of visas and work permits.
- 15.5.12 The workers most vulnerable to labour rights breaches are:
- Those working for contractors or subcontractors with little formal knowledge of the labour law or the international standards
 - Lower skilled, young and less literate workers
 - Shift workers (security, canteen, cleaners, and drivers)
 - Workers further down the contracting tier
 - Female and other workers who may also face risks related to gender-based violence (GBV)⁵
- 15.5.13 In accordance with IFC PS2 and EBRD ESR2, the Project recognises the importance of identifying and managing occupational health and safety risks to workers during construction. Workers may be exposed to a range of physical hazards (e.g. working at height, noise, vibration, manual handling, and operation of heavy equipment), chemical hazards (e.g. dust, fumes, solvents, and fuels), and biological hazards (e.g. exposure to wastewater, vector-borne diseases, or contaminated materials). These risks will be addressed through the implementation of a comprehensive OHSW management plan, in line with national legislation and international standards. Measures will include hazard identification, risk assessment, training, provision of appropriate personal protective equipment (PPE), emergency preparedness, and health surveillance, with the aim of preventing incidents and promoting worker wellbeing. Risks relating to land contamination are discussed in **ESIA Chapter 9: Geology and soils**.
- 15.5.14 As mentioned in the methodology section, no significance is attributed to workers' OHSW risks, but management measures are identified.

Project induced in-migration

- 15.5.15 Project induced in-migration can occur when people hear about large projects and potential employees and others move into the area. However, on this Project the required labour force

⁴ Antisocial behaviour refers to behaviour that would not customarily be accepted in society such as substance abuse that causes accidents, prostitution, criminality, theft, domestic violence, human trafficking, teenage pregnancy, inappropriate or illegal exploitation of natural resources, etc.

⁵ GBV is defined by the IFC as: "an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises." (IFC Good Practice Note: Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works', 2018)

numbers are not large and much of the workforce will be sourced locally from Almaty City and the Almaty Region.

- 15.5.16 An accommodation plan has been developed by YDA, indicating that it intends to house workers sourced from a greater distance and any international EPC staff in rented accommodation, 10km from the airport site. As well, its workers will be provided with three meals a day at the accommodation site. The staff will be transported to the site by shared minibuses or private vehicles. The accommodation plan outlines there will be a security gate within the workers accommodation site and one security manager across the Project for the construction phase. In addition, there will be 24-hour security in place during construction for managing access by the general public.
- 15.5.17 Accommodation must meet the requirements set out in the 2009 Workers' accommodation processes and standards by the IFC and EBRD. Its requirements cover:
- Standards for rooms (size, number of people in a room), as well as accessible kitchen, toilets, washroom, kitchen, canteen, laundry, medical and leisure facilities
 - Adequate ventilation and temperature control for the local climate
 - Regular cleaning and pest control
 - Privacy measures in place e.g., all doors and windows to be lockable, curtains for rooms, shower cubicle curtains or doors, separate sleeping areas by gender, protection against theft
 - Adequate number of first aid kits available
 - Nutrition and food safety standards
 - Accommodation management and security plans, policies and procedures in place
 - Residents have freedom of movement and association
 - Mechanisms in place for reporting facility maintenance and behaviour issues
- 15.5.18 As the number of non-local workers is small (for instance 15% of the YDA workforce), this induced in-migration will not pose a risk of pressure and strain on the local social infrastructure, such as hospitals and health centres during construction. YDA's staffing schedule includes the provision of one doctor, one nurse and two first aiders, which will also help to alleviate any strain across local social infrastructure.
- 15.5.19 This impact is expected to be **minor** in magnitude due to the majority of the workforce being sourced locally across the Almaty Region and the provision of the accommodation site. The sensitivity of the host community is **low** (there is resilience to cope with the influx) so the effect is **minor adverse (not significant)**.

Increase in noise, dust and construction related traffic

- 15.5.20 Construction can cause increased noise and air pollution due to increased traffic movements, dust, and other impacts of construction activities. Construction workers and existing operational staff are potentially vulnerable to OHS hazards associated with construction activities. The following safety risks and hazards are typical of construction sites:
- Traffic, exposure to weather factors and extreme weather, noise, work in confined spaces, trenching, contact with power lines, falls from machinery or structures, and risk of falling objects
 - Exposure to emissions during construction and paving activities; including dust, and exhaust emissions from heavy equipment and motor vehicles during construction and maintenance

Within **ESIA Chapter 11: Noise**, **ESIA Chapter 5: Air quality** and **ESIA Chapter 12: Traffic and transport**, there are no identified significant effects during the construction period if all outlined mitigation within these chapters is implemented. However, the noise level is expected to increase across the site during construction, the dust nuisance from construction activities is

anticipated to increase, and there is an expected increase in traffic which will also potentially contribute to an increase in noise levels. It is highlighted that these effects will be more likely to be experienced during the construction of the new runway. As a result, suitable mitigation as outlined within **ESIA Chapter 11: Noise**, **ESIA Chapter 5: Air quality** and **ESIA Chapter 12: Traffic and transport**, including noise optimised construction equipment, the implementation of a CEMP and CTMP, should be followed to minimise any related impacts on workers.

15.5.21 The YDA staffing schedule indicates that eight of its workers will be health and safety staff, which is slightly less than the good international industry practice target of one per 50 workers. Workers who are more susceptible to OHS incidents and will require more mentorship and supervision are:

- Young and new workers
- Workers who are frequently lifting heavy objects
- Workers involved in repetitive work tasks
- Construction workers who receive poor PPE (for instance flimsy gloves which do not protect fingers), or pay less attention to safety briefings

15.5.22 As mentioned in the methodology section, no significance is attributed to workers' OHSW risks, but management measures are identified.

Operational phase effects

Employment opportunities during operation

15.5.23 Employment generated during the operational phase will mainly be permanent, and of a longer-term nature compared to that of the construction phase. Once operational, the Project will offer new skilled and unskilled jobs as a result of the increased passenger and air traffic. As of June 2025, a staffing plan had been developed and ALA was recruiting for almost 400 new positions. Almost 50% of new positions are within the ground handling department as a result of the predicted increase in passenger numbers. ALA is projected to handle approximately 12.3 million passengers (5.5 million from international traffic and 6.8 million from domestic traffic), approximately 1 million more than it handled in 2024. It is also projected to handle 10,400 cargo Air Traffic Movements (ATMs).

15.5.24 The Project plans to recruit most operational personnel from Almaty. The Project's operational staff functions will include operation and maintenance of the Project and ground facilities, flight safety for the increasing international and domestic air traffic, provision of ground service for passengers, baggage handling, cargo and mail, operation of checkpoints and IT systems, support of information enquiries and booking, aviation staff training and improvement of skills.

15.5.25 The new jobs created will provide specialist skills development opportunities, offering on-the-job training and skills improvement programmes. As part of the Project, a new head office and training centre will be built for utilisation by ALA employees.

15.5.26 Recruitment measures will include advertising new positions available in the terminal via the airport website and employment centres. This will be supported by the development of a Disability Inclusion and Workforce Diversity Action Plan to help support the expansion of employment opportunities and attract a more diverse workforce.

15.5.27 Some of the jobseekers will be more sensitive than others. For instance, labour market outcomes indicate differences between women and men. Some women may have higher sensitivity due to experiencing a lack of decent working conditions and social security benefits, having less promotion opportunities and facing lower salaries compared to men. Some potential jobseekers, such as young adults who are unemployed and already suffering deprivation, may also have higher sensitivity.

- 15.5.28 As highlighted, there will be a predicted net increase in permanent job opportunities in the longer term which will make the magnitude of the impact **negligible**. The sensitivity of the receptor is **medium** as it will result in current job seekers attempting to secure employment with guaranteed positions, wages and job security. Combining sensitivity and impact magnitude, operational employment is a positive **negligible (not significant)** effect.

Risks to operational workers' OHSW during operation

- 15.5.29 OHSW policies are essential to protecting the health and safety of the operational staff. ALA already has HR plans and procedures in place which include elements relating to OHSW. Measures relating to OHSW are also written into their standard contract with contractors and other suppliers. The Project will require a review of ALA's environmental and social management system, for instance to confirm whether additions need to be made to the plans and procedures, or if new method statements are required. In particular this may be the case for the new equipment at the fuelling area, the new buildings and facilities such as the catering building. Monitoring of the plans and procedures will need to continue. Staff break areas have been previously flagged in the grievance log as unfit for purpose, and monitoring of staff welfare spaces is essential.
- 15.5.30 ALA has a variety of procedures and plans that address emergency preparedness and response. Operational staff need to be aware of these management tools and will be involved in drills.
- 15.5.31 The new onsite training centre will be accessible for operational workforce employees with annual training courses on the latest health and safety standards. This centre will also be used to allow the operational staff to grow and develop their technical skills. The ALA HR Policy indicates that annual performance reviews for all employees will take place which will provide them with the ability to strive for a performance bonus, and training will support skills and knowledge that contribute to career growth.
- 15.5.32 As mentioned previously, most ALA operational staff belong to a union. Participation in union organised activities and interacting with worker representatives are opportunities and means of creating a healthy, fair and respectful working environment.
- 15.5.33 In line with the World Bank Group EHS Guidelines for Airports, operational staff may be exposed to a range of occupational health and safety hazards, including physical risks (e.g. slips, trips, noise, manual handling), chemical exposures (e.g. fuels, cleaning agents), and biological hazards (e.g. waste handling, communicable diseases). These risks are addressed through ALA's existing procedures, including training, PPE use, and emergency preparedness, and will continue to be monitored and updated as part of the ongoing review of the environmental and social management system.
- 15.5.34 As mentioned in the methodology section, no significance is attributed to workers OHSW risks, but management measures are identified.

15.6 Mitigation

- 15.6.1 This section describes the management measures (mitigation, enhancement and monitoring) to be taken to minimise and / or prevent the predicted potential impacts and risks related to working conditions and labour relations during both construction and operation.

Construction phase mitigation

- Outline and require a fair and transparent, gender-neutral recruitment process for all jobs.

- Prioritise employment of the local workforce ('local' to be considered Almaty City and Almaty Region) to the extent possible considering unskilled, semi-skilled and skilled workforce, and giving priority to potentially vulnerable groups, including women and young adults.
- Develop a schedule for implementing the contractor OHSW plan and procedures (including permit to commence work) based on a risk assessment prior to onsite activities which will be applicable to contractors on this Project.
- Maintain and make accessible the grievance process to all employees and workers.
- Require contractors to have OHSW plans and procedures to mitigate any health and safety risks. These plans and procedures will need to address operational staff who may be exposed to noise, dust, and emergency preparedness risks from the construction activities. Training for staff on OHSW and emergency preparedness will need to cover construction workers but also operational workers who are identified as being affected by the risks which may arise from the construction activities.
- Require contractors to provide training for unskilled local workers supported through the new onsite training centre, to allow them to obtain, retain and develop their roles as much as possible.
- Provide medical checks for construction workers prior to work on site to confirm fitness for their work and also to relieve pressure on local social infrastructure.
- For rented accommodation provided by contractors - where use is mandatory and workers cannot choose their own housing - conduct a full inspection of the facility prior to occupancy. The inspection will follow the monitoring template outlined in the EBRD and IFC Guidance on Worker Accommodation, ensuring compliance with minimum standards for safety, hygiene, privacy, and access to services.
- Require the EPC contractors to undertake a supply chain analysis of primary suppliers to identify any risks related to use of child or forced labour and unacceptable OHSW conditions. Relevant clauses will be included in the suppliers' contracts to comply with supply chain requirements in PS2 and PS6 as well as with ADP's Group Code of Conduct.
- Develop and adopt a Code of Conduct for all workers as part of their employment contract. This will cover norms relating to treating coworkers respectfully, protecting against harassment at the worksite, interacting courteously with the local community, as well as following expectations regarding the use of training and occupational behaviour.
- Increase recruitment of health and safety staff so that it is in line with the good international industry practice target of one per 50 workers.
- The contractors will be expected to have OHSW plans in place to mitigate health and safety risks. ALA has policies in place relating to child and forced labour risks; however, they only cover direct workers. These aspects need to be considered and monitored within contractors' policies.
- Require EPC contractors to provide monthly reports of their workforce (including subcontractors covering origin -local, national and international- and gender), working hours, overtime use, timely payment of wages, training activities including toolbox talks, labour grievances, protests, union activities, worker accommodation provisions, OHS statistics, and other relevant work-related details.

Operational phase mitigation

- Outline and require a fair and transparent, gender-neutral recruitment process for all jobs.
- Continually monitor and update the HR Policy to promote equal opportunities for the workers.
- Continually monitor and update the OHSW Policy to mitigate operational risks for the workers.

- Require contractually that all third parties (tenants, suppliers and subcontractors) achieve compliance with the performance requirements of Kazakhstan and international requirements including EBRD ESR1, ESR2 and ESR4, IFC PS1, PS2 and PS4, and ILO 81, 148, 155 and 167.
- Require contractually that all workers have individual contracts of employment before starting on site in line with the Labour Code of Kazakhstan, EBRD ESR2 and IFC PS2 requirements. Contracts will need to cover rights and obligations of the parties, hours of work, wages, overtime, compensation and benefits such as maternity or annual leave.
- Wellbeing programmes should be considered by ALA to help support employees' development and mental health. As most flights are at night ALA could introduce awareness programmes to help the workforce manage any associated sleep deprivation issues. In addition, ALA could implement a counsellor within the onsite medical centre to help support any of the operational staff who may suffer from stress, depression and other mental health related issues.

15.6.2 If these mitigation measures are adopted, then for the workers in both the construction and operational phases of the Project, potential risks and impacts can be successfully mitigated.

15.7 Summary of residual effects

15.7.1.1 Residual effects after the application of mitigation are presented in Table 15.3.

Table 15.3: Summary of residual effects for workers

Description of effect	Permanent or temporary	Sensitivity of receptor	Magnitude of impact	Significance of effect before additional mitigation	Additional mitigation	Residual effect	Proposed monitoring
Construction phase							
Temporary employment generation	Temporary	Medium	Minor	Minor beneficial (not significant)	<ul style="list-style-type: none"> Outline and require a fair and transparent, gender-neutral recruitment process for all jobs. Prioritise employment of the local workforce ('local' to be considered Almaty City and Almaty Region) to the extent possible considering unskilled, semi-skilled and skilled workforce, and giving priority to potentially vulnerable groups, including women and young adults. Require contractors to provide training for unskilled local workers supported through the new onsite training centre, to allow them to obtain, retain and develop their roles as much as possible. Require EPC contractors to provide monthly reports of their workforce (including subcontractors covering origin-local, national and international-and gender), working hours, overtime use, timely payment of wages, training activities including toolbox talks, labour grievances, protests, union activities, worker accommodation provisions, OHSW statistics, and other relevant work-related details. 	Minor beneficial (not significant)	Annually by EPC Contractors
Risks to workers' wellbeing, and labour rights during construction	Temporary	N/A	N/A	N/A	<ul style="list-style-type: none"> Develop a schedule for implementing the contractor OHSW plan and procedures (including permit to commence work) based on a risk assessment prior to onsite activities which will be applicable to contractors on this Project. Maintain and make accessible the grievance process to all employees and workers. Require contractors to have OHSW plans and procedures to mitigate any health and safety risks. Staff will be provided with training on the additional risks which may arise during the construction period. Provide medical checks for construction workers prior to work on site to confirm fitness for their work and also to relieve pressure on local social infrastructure. For the rented accommodation provided by contractors (where use is obligated and individual selection is not an option), complete the 	N/A	Quarterly by EPC Contractors

Description of effect	Permanent or temporary	Sensitivity of receptor	Magnitude of impact	Significance of effect before additional mitigation	Additional mitigation	Residual effect	Proposed monitoring
					<p>inspection of the workers accommodation using the monitoring template in the accommodation EBRD and IFC Guidance on Worker Accommodation prior to use of the facility by workers.</p> <ul style="list-style-type: none"> Require the EPC contractors to undertake a supply chain analysis of primary suppliers to identify any risks related to use of child or forced labour and unacceptable OHSW conditions. Relevant clauses will be included in the suppliers' contracts to comply with supply chain requirements in PS2 and PS6 as well as ADP's Group Code of Conduct. Adopt ADP's Group Code of Conduct for all workers as part of their employment contract. This covers norms related to treating coworkers respectfully, protecting against harassment at the worksite, interacting courteously with the local community as well as following expectations regarding use of training and occupational behaviour. 		
Project induced in-migration	Temporary	Low	Minor	Minor beneficial (not significant)	<ul style="list-style-type: none"> Prioritise employment of the local workforce ('local' to be considered Almaty City and Almaty Region to the extent possible considering unskilled, semi-skilled and skilled workforce, and giving priority to potentially vulnerable groups, including women and young adults. Outline and require a fair and transparent, gender-neutral recruitment process for all jobs. Provide medical checks for construction workers prior to work on site to confirm fitness for their work and also to relieve pressure on local social infrastructure. 	Negligible (not significant)	Annual monitoring by ALA and EPC contractor
Increase in noise, dust and construction related traffic	Temporary	N/A	N/A	N/A	<ul style="list-style-type: none"> Require contractors to have OHSW plans and procedures to mitigate any health and safety risks. These plans and procedures will need to address operational staff who may be exposure to noise, dust, and emergency preparedness risks from the construction activities. Training for staff on OHSW and emergency preparedness will need to cover construction workers but also operation workers who are identified as being affected by the at risk risks which may arise from the construction activities. 	N/A	Quarterly monitoring by ALA and EPC contractor

Description of effect	Permanent or temporary	Sensitivity of receptor	Magnitude of impact	Significance of effect before additional mitigation	Additional mitigation	Residual effect	Proposed monitoring
					<ul style="list-style-type: none"> Increase recruitment of health and safety staff so that it is in line with the good international industry practice target of one per 50 workers. 		
Operational phase							
Permanent employment generation	Permanent	High	Negligible	Negligible (not significant)	<ul style="list-style-type: none"> Outline and require a fair and transparent, gender-neutral recruitment process for all jobs. Continually monitor and update the HR Policy to promote equal opportunities for the workers. 	Moderate beneficial (significant)	Annual monitoring by ALA
Risks to workers wellbeing and health and safety	Permanent	N/A	N/A	N/A	<ul style="list-style-type: none"> Continually monitor and update the HR Policy to promote equal opportunities for the workers. Continually monitor and update the OHSW Policy to mitigate operational risks for the workers. Require contractually that all third parties (suppliers, tenants and subcontractors) achieve compliances with the performance requirements of Kazakhstan and international requirements including, EBRD ESR1, ESR2 and ESR4, IFC PS1, PS2 and PS4, and ILO 81, 148,155 and 167. Require contractually that all workers have individual contracts of employment before starting on site in line with the Labour Code of Kazakhstan, EBRD ESR2 and IFC PS2 requirements. Contracts will need to cover rights and obligations of the parties, hours of work, wages, overtime, compensation and benefits such as maternity or annual leave. 	N/A	Annual monitoring by ALA

