

# **Aktau Port Modernisation**

Stakeholder Engagement Plan

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## ACRONYMS AND DEFINITIONS

ACRONYMS AND DEFINITIONS	
AoI	Area of Influence
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAA	Environmental and Social Audit and Assessment
ESP	Environmental and Social Policy
IPAM	Independent Project Accountability Mechanism
km	Kilometre
KTZ	Kazakhstan Railways
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
PAP	Project Accountability Policy
PR	Performance Requirement
QMS	Quality Management System
SEP	Stakeholder Engagement Plan
TEU	Twenty-foot Equivalent Unit

# 1 INTRODUCTION AND PROJECT SUMMARY

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## 1.1 OVERVIEW

- 1.1.1 This document is the Stakeholder Engagement Plan (SEP) for the Aktau Port Modernisation Project (the “Project”) in Aktau, Kazakhstan. To finance the Project, JSC National Company Aktau Sea Commercial Port (the “Client”) is seeking funds from the EBRD.
- 1.1.2 This SEP has been prepared for the purpose of maintaining a positive relationship with the stakeholders during the lifetime of the Project, in line with relevant Kazakhstani legislation and the EBRD’s Environmental and Social Policy (ESP). The SEP covers both the construction and operational phases of the Project.

## 1.2 OBJECTIVES AND STRUCTURE OF THE STAKEHOLDER ENGAGEMENT PLAN

- 1.2.1 The objectives of this SEP are:
- Identifying stakeholders that are potentially affected by the Project or who may be interested in the Project. This includes internal stakeholders such as workers and management, as well as external stakeholders such as clients, suppliers, regulatory bodies, non-governmental organisations (NGOs) etc.
  - Analysing the identified stakeholders’ needs.
  - Building constructive relationships and forming a continuous communication strategy with stakeholders.
  - Managing stakeholders’ interests and potential risks, conflicts and issues at the earliest stage of the Project and developing strategies to address them.
  - Enhancing decision making by using outputs of the effective stakeholder engagement and involving stakeholders in key decisions.
  - Promoting accountability and transparency by clearly defining roles, responsibilities and expectations for both the Port and its stakeholders.
- 1.2.2 The SEP is structured as follows:
- Section 1.3.1 sets out the stakeholder engagement requirements of the Project aligned with Kazakhstani legislation as well as the EBRD’s ESP.
  - Section 3 describes stakeholder engagement carried out by the Port to date.
  - Section 4 presents the identification and analysis of the Project stakeholders.
  - Section 5 sets out a stakeholder engagement programme.
  - Section 6 describes internal and external/public grievance mechanisms.
  - Finally, Section 7 sets out monitoring and reporting requirements.

## 1.3 THE PROJECT LOCATION

### Project Location

- 1.3.1 Aktau Port is situated on the eastern coast of the Caspian Sea in Mangystau Region, western Kazakhstan. Aktau is a strategic maritime gateway and the country's only commercial seaport with direct access to the open sea. The Port lies within the administrative boundaries of the city of Aktau, southeast of the city centre.
- 1.3.2 The Port is located in an industrial area. It was designed for international transportation of various dry cargoes, crude oil and oil products, as well as for servicing passenger and cargo ferries, and started its operations in the early 1980s. Since then, the Port has been through several extensions and modernisations.
- 1.3.3 Aktau Port and surrounding environment is shown in Figure 1-1.

Figure 1-1 Aktau Port and Surrounding Environment



Source: Ecoline ESAA Report, 2022

- 1.3.4 To the north, the Port borders the territory of Aktau Sea Northern Terminal LLP, which provides transshipment services for general cargo and grain. Approximately 2 km further north lies the Primorskiy residential area of Aktau, situated adjacent to a public beach.
- 1.3.5 The closest residential area to the Port is the village of Umirzak, located at a distance of approximately 1.6 km from the Port. An oil depot, owned and operated by KazTransOil JSC, is situated between the Port and Umirzak.

## 1.4 PROJECT AREA OF INFLUENCE

- 1.4.1 As per the area of influence (Aol) definition included in PR1, the areas, facilities and communities potentially impacted by the Project are listed below:

- The direct area of influence of the Project which is the Project footprint including the extension of Berth 3 and the new berth.
- The full extent of the Port.
- Closest residential areas due to potential impacts on air quality.
- Businesses and other stakeholders that will be both indirectly and directly affected by the construction and operational phases of the Project.
- Waste disposal areas and facilities to be used during the construction and operational phases of the Project.
- Communities that will provide labour and services to the expanded Port.
- Footprint of an associated dredging project essential to the proposed Project; without the dredging, the new berths cannot be used.

### Dredging Project

- 1.4.2 The dredging works for the Port are designed to enhance navigational access for dry cargo ships and port fleet vessels by deepening the seabed within the designated water area, located approximately 850 metres from the breakwater head. The total dredging area covers 106.4 hectares.
- 1.4.3 Figure 1-2 shows dredging project layout. The dredged material will be deposited in the green area indicated. The project schedule for the dredging works has not yet been confirmed.

Figure 1-2 Dredging project Layout



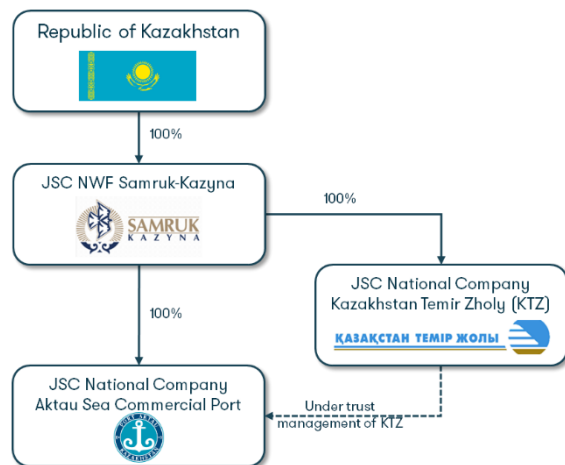
Source: Aktau Port

## 1.5 AKTAU PORT

- 1.5.1 The Port was established in 1963 and is one of Kazakhstan's two major ports on the Caspian Sea. It is wholly owned by the Republic of Kazakhstan (RK) through the Sovereign Wealth Fund Samruk-Kazyna JSC. This fund also owns 100% of Kazakhstan Railways (KTZ), the operator of the Port. Figure 1-3 below illustrates the shareholding structure.



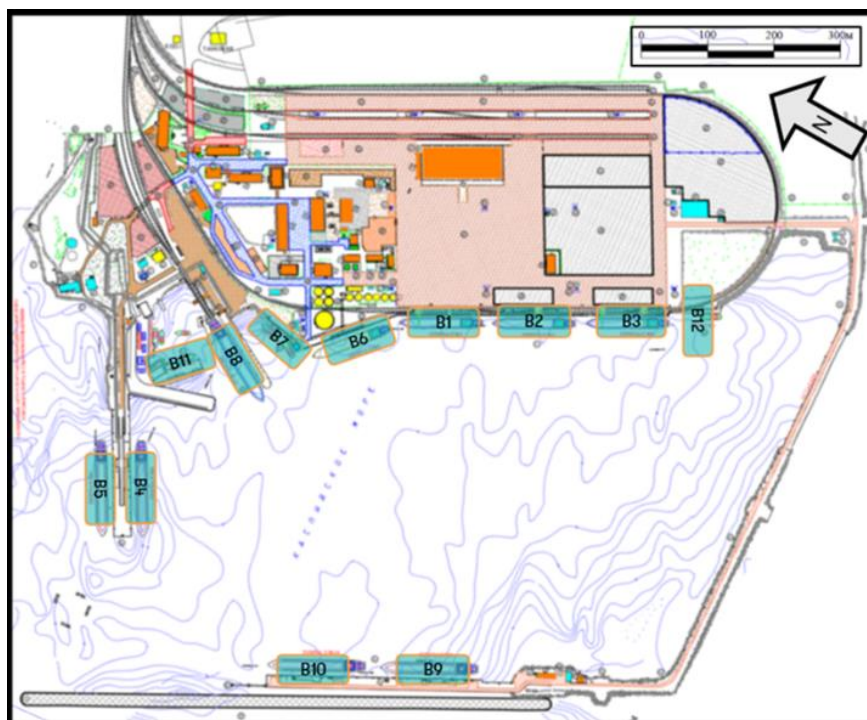
Figure 1-3 Aktau Port Shareholding Structure



Source: EBRD

1.5.2 Figure 1-4 presents the berth layout, with Table 1-1 providing detailed information on each berth, including their length, depth, and designated purpose.

Figure 1-4: Port Aktau Berth Layout



Source: Aktau Port

Table 1-1. Berths of Aktau Port

BERTH NO.	LENGTH, M	BERTH DEPTH, M	PURPOSE
1	150	4.6	General cargo / containers
2	150	4.6	General cargo / containers and Ro-Ro ferry mooring
3	100	4.6	General cargo / bulk cargo
4	192	6.8	Oil berth
5	192	6.8	Oil berth

BERTH NO.	LENGTH, M	BERTH DEPTH, M	PURPOSE
6	150	4.6	Multi-purpose-loading of grain heavyweights and mooring of the Ro-Ro ferry
7	70	4.0	Port fleet
8	140	5.1	Ferry pier
9	150	5.1	Oil berth
10	150	6.8	Oil berth
11	120 (55 presently)	4.8 (presently 1.8)	Former berth converted into a boom berth / ecological jetty
12	80	4.0	Small vessels

## 1.6 THE PROJECT

- 1.6.1 The Project being evaluated by EBRD is to enable the Port to increase its container throughput to 240,000TEU and comprises the following main elements:
- Extension of Berth 3.
  - New Berth 12.
  - 2 new quay cranes to be located on Berth 1.
- 1.6.2 In addition, the existing rail track infrastructure will be expanded to accommodate the anticipated increase in cargo volumes.
- 1.6.3 To accommodate the construction of the new Berth 12 and the extension of the rail track, land reclamation works will be carried out. This includes filling a small area adjacent to the existing Berth 12, as well as the area falling within the footprint of the planned railway extension.

## 1.7 PROJECT CATEGORISATION

- 1.7.1 According to the EBRD ESP, the EBRD has categorised the Project as a Category B project. This is an extension project to the existing Port and although there is an expectation of adverse environmental and social risks/impacts, these are likely to be limited, few in number and can be readily mitigated by adhering to generally recognised methods, guidelines and design criteria. The Consultant agrees with this categorisation.



## 2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

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### 2.1 INTRODUCTION

2.1.1 This SEP has been prepared in compliance with the following legislation and standards:

- Relevant Kazakhstani legislation.
- The EBRD's 2019 ESP and specifically the associated Performance Requirements 1 and 10.

### 2.2 NATIONAL REQUIREMENTS OF THE REPUBLIC OF KAZAKHSTAN

2.2.1 The RK has ratified the Convention on Access to Information, Public Participation in Decision-making and access to justice in environmental matters [the Aarhus Convention (1998)]<sup>1</sup>. The key legal acts related to the Environmental Impact Assessment (EIA) procedure and information disclosure and applicable to the Project are described below.

2.2.2 The new Environmental Code<sup>2</sup> (hereinafter –“the Code”) entered into force on 1 July 2021, with some articles coming into effect stepwise. In accordance with the Code, the public has the right to access complete, reliable, and timely environmental information available to the state bodies. Holders of environmental information are obliged to provide it upon request. At the same time, the laws of the RK and the Aarhus Convention clearly describe cases when it is possible to refuse sharing the environmental information: if the materials are at the final stage of their preparation, or if the requested information is absent or out of the consultee's area of expertise. Individuals and legal entities are recognised as holders of environmental information in terms of the environmental information they possess.

2.2.3 Article 15 of the Code states that *"the interested public has the right to participate, on the conditions and in the manner established by the Code, in the process of environmental assessment and in making other decisions on environmental issues by the state bodies and officials."*

2.2.4 The Code envisions conducting public hearings during the national EIA procedure, however, there are no requirements for accounting public opinion during the post-EIA stage, i.e. during the project construction or operation stages.

2.2.5 The Instruction on Conducting Environmental Impact Assessment<sup>3</sup> defines the disclosure process for project information (environmental and social impacts, risks, etc.) through public hearings, collection of written proposals and comments from the public as well as through written proposals and comments via a survey of the population living in the project area.

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<sup>1</sup> Law of the RK of 23 October 2000, No. 92-II ZRK. [https://adilet.zan.kz/rus/docs/Z000000092\\_](https://adilet.zan.kz/rus/docs/Z000000092_)

<sup>2</sup> Environmental Code of the RK of 2 January 2021 No. 400-VI ZRK as amended on 9 April 2025.  
<https://adilet.zan.kz/rus/docs/K2100000400>

<sup>3</sup> Order of the Ministry of Ecology, Geology and Natural Resources of the RK of 30 July 2021 No, 380.  
<https://adilet.zan.kz/rus/docs/V2100023809>

2.2.6 Pursuant to the Rules for Conducting Public Hearings<sup>4</sup>, public hearings are conducted as open meetings and public discussions. When arranging an open meeting, the project sponsor agrees with the respective local executive body the date, time and venue for public hearings via a portal<sup>5</sup> and distributes the announcement on public hearings in the media, including at least one periodical print publication (a newspaper) and through at least one TV or radio channel. The local executive body then approves the time and venue of the public hearings or provides a reason for its refusal. When arranging public hearings as public discussions, the project sponsor publishes an announcement in the media notifying about the public hearings as per the requirements. An authorised official from the respective local executive authority is appointed to draw up and sign the minutes of such discussion using a special form as per the Rules. In the absence of justified responses by the project proponent on the comments and proposals received during the public discussions, repeated public hearings may be required.

## 2.3 EBRD REQUIREMENTS

2.3.1 EBRD-financed projects are expected to operate in compliance with good international practice relating to sustainable development. The Port will adhere to the disclosure and stakeholder requirements of EBRD PR1 and PR10.

2.3.2 PR1: Environmental and Social Appraisal and Management requires the Port to develop a systematic approach to managing environmental and social (E&S) risks as a result of the Project. It highlights the necessity to identify the Port's potential stakeholders as well as their current and future stakeholder engagement activities.

2.3.3 PR10: Information Disclosure and Stakeholder Engagement:

- The Port is required to identify groups and individuals who are likely to be affected by the Project or may have an interest in it. Also, the Port must identify individuals and groups that may be affected by the Project due to their disadvantaged or vulnerable status.
- The Port is required to ensure that stakeholder engagement will be an ongoing process involving meaningful consultation with potentially affected parties as well as putting in place effective grievance mechanisms. It is a necessity for stakeholder engagement and information disclosure to be free of manipulation, coercion and intimidation as well as conducted on a timely, relevant and understandable basis.
- The nature and frequency of stakeholder engagement activities are required to be appropriate to the scale of the Project and the potential adverse impacts on affected communities. Stakeholder engagement requirements of Kazakhstani law with respect to public information and consultation must also be upheld.
- The Port is also required to outline the public grievance mechanisms available and ensure that stakeholder complaints are responded to in a timely manner.

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<sup>4</sup> Order of the Ministry of Ecology, Geology and Natural Resources of the RK on 3 August 2021 No. 286.  
<https://adilet.zan.kz/rus/docs/V2100023901>

<sup>5</sup> <https://ecoportal.kz>

### 3 STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

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#### Stakeholder engagement as part of EIA process:

- 3.1.1 The Company has prior experience engaging with stakeholders on environmental protection and health and safety matters in line with national requirements, particularly during EIAs and permitting processes for emissions.
- 3.1.2 The recent approval procedure for the dredging project required a public hearing which took place on 22 November 2024. The hearing included 38 participants, most of whom identified themselves as residents.
- 3.1.3 As required by law, public hearings are typically related to new projects. Current operations, possible public concerns, and the results achieved in preventing and reducing impacts are not necessarily discussed with stakeholders.
- 3.1.4 To organise a meaningful and informed dialogue, a proactive Company policy and approach, including implementation of all elements of stakeholder engagement in accordance with the EBRD's PR 10 is necessary.

#### Stakeholder engagement as part of the development of the Quality Management System:

- 3.1.5 During the development of the Quality Management System (QMS), the Company identified and assessed its internal and external stakeholders.
- 3.1.6 The Company analysed the following sources of information to understand its internal stakeholders needs:
  - Internal regulatory and organisational administrative documents (including procedures and meeting minutes).
  - Collective agreements and employment contracts.
  - Team meetings with employees.
  - Employee surveys.
- 3.1.7 The Company analysed the following sources of information to understand its external stakeholders needs:
  - Legislation.
  - Permits (including licenses).
  - Current and past contracts with external stakeholders.
  - Correspondence with customers and other external stakeholders (including customer satisfaction questionnaires, surveys, complaints, claims, recommendations).
  - Minutes of meetings with customers, contractors and other external stakeholders.
  - Inspection reports from regulatory authorities (including audit reports).

- 3.1.8 To understand the needs and expectations of the Company's stakeholders and improve the quality of services, the Company conducted client surveys in 2024. The questionnaire was sent to 140 companies, including individual entrepreneurs. The Company received responses from 6 companies.
- 3.1.9 The Company analysed the survey responses and proposed mitigation measures for issues raised.

### Information disclosure and feedback

- 3.1.10 The Company provides certain environmental information on the Company website (<https://portaktau.kz/en/>). The Company's public relations campaigns on social media are mainly focused on its commercial activities, announcements on new services, opportunities, advertisement, etc. Therefore, the online focus is on professionals, clients and investors, and has little focus on active groups of local communities and residents.

## 4 PROJECT STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 4.1 OVERVIEW

- 4.1.1 Stakeholders are defined as individuals or groups who are affected by the Project, have a legitimate interest or could influence the outcome of the Project. The Company is associated with a wide range of stakeholders. This section highlights both Project-specific and Port-wide stakeholders.
- 4.1.2 As mentioned above, during the development of the QMS, the Company identified the stakeholders who are also relevant to the Project including: clients, shareholders, the operating company, employees, the public, supervisory and control authorities, local executive authorities, banks, insurance companies, suppliers and partners.

### 4.2 PROJECT STAKEHOLDERS

- 4.2.1 This SEP separates the Projects' stakeholders into two groups – internal and external stakeholders. The internal stakeholders are those directly related to the Project and are involved in the day-to-day operation of the Port. Separately, the external stakeholders are those affected by or have an interest in the Project and have a varying degree of influence. However, they operate outside the internal affairs of the Port.
- 4.2.2 Table 4.2-1 and Table 4.2-2 cover the Project-specific stakeholders in line with the EBRD's 2019 ESP.

Table 4.2-1 Internal Project Stakeholders

Stakeholder Group	Stakeholders	Specific Interest in the Project
Employees	○ Workers.	<ul style="list-style-type: none"><li>○ Job security.</li><li>○ Stable salary.</li><li>○ Monetary benefits.</li><li>○ Measures are implemented to prevent the impact of harmful and/or hazardous conditions on workers.</li><li>○ Timely issuance of personal protective equipment.</li><li>○ Environmental safety, security, health of workers, and pollution prevention.</li></ul>
Shareholder	○ JSC "National Welfare Fund "Samruk-Kazyna".	<ul style="list-style-type: none"><li>○ Profitability.</li><li>○ Transparent activities.</li><li>○ Increase income and stability.</li><li>○ Cost reduction.</li><li>○ Prevention of poor-quality services.</li><li>○ Optimisation of work and technological processes.</li><li>○ Competitiveness.</li><li>○ Ensuring the Company's activities comply with legislation.</li></ul>
Operating company	○ JSC "NK "KTZ".	<ul style="list-style-type: none"><li>○ Timely and complete reporting.</li><li>○ Transparency.</li><li>○ Ensuring the Company's activities comply with legislation.</li></ul>

Table 4.2-2 External Project Stakeholders

Stakeholder Group	Stakeholders	Specific Interest in the Project
Clients	<ul style="list-style-type: none"> <li>Shippers.</li> <li>Consignees.</li> <li>Ship owners.</li> <li>Ship crews.</li> </ul>	<ul style="list-style-type: none"> <li>Reasonable prices and processing conditions regarding cargo handling.</li> <li>Free storage.</li> <li>Reduction of tariffs.</li> <li>Ensuring safe working conditions and protection from environmental pollution when performing works on the Port's territory.</li> </ul>
Local community	<ul style="list-style-type: none"> <li>Residents of the Primorsky residential unit and Umirzak settlement.</li> <li>Residents of Aktau.</li> </ul>	<ul style="list-style-type: none"> <li>Creation of additional jobs.</li> <li>Modernisation of infrastructure.</li> <li>Expansion of the range of goods handled for public consumption.</li> <li>Ensuring security, public health, pollution prevention, and environmental protection.</li> </ul>
Potentially vulnerable groups	<ul style="list-style-type: none"> <li>Unemployed people of Aktau including Umirzak and Primorsky.</li> <li>The elderly, youth, disabled people, orphans, female-headed families, and other vulnerable groups (to be studied).</li> </ul>	<ul style="list-style-type: none"> <li>Equitable distribution of benefits.</li> <li>Specific needs in terms of stakeholder engagement methods.</li> <li>(To be studied and relevant methods to be developed).</li> </ul>
The Public	<ul style="list-style-type: none"> <li>Various stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>Information about the Project, its progress, and its E&amp;S impacts.</li> <li>News about the Company's activities.</li> </ul>
Supervisory authorities	<ul style="list-style-type: none"> <li>Prosecutor's Office.</li> <li>Law enforcement authorities.</li> <li>Maritime Administration Port Committee.</li> <li>The Ministry of Industry and Construction of the RK.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with the legislation of the RK on environmental protection, labour laws and regulations regarding occupational safety and health, legislation and regulations on industrial security.</li> </ul>
Control authorities	<ul style="list-style-type: none"> <li>Department of Labour Management.</li> <li>Department of Ecology.</li> <li>Department of state income.</li> <li>Department of Protection of consumers and others.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legal requirements.</li> <li>Complaints from customers regarding the quality of services.</li> <li>Compliance with the legislation of the RK on environmental protection, labour laws and regulations regarding occupational safety and health, legislation and regulations on industrial security.</li> <li>Complaints from the public regarding negative environmental or health impacts due to Project activities.</li> </ul>
Local executive authorities	<ul style="list-style-type: none"> <li>Regional Akimat.</li> <li>City Akimat.</li> <li>District Akimat.</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of state policy regarding environmental protection and labour protection.</li> <li>Complaints from the local community regarding environmental and health and safety issues.</li> </ul>
Banks	<ul style="list-style-type: none"> <li>JSC "People's Bank".</li> <li>JSC Bankcentercredit.</li> <li>JSC Development Bank Kazakhstan" and others.</li> </ul>	<ul style="list-style-type: none"> <li>Stability of financial performance indicators of the Company.</li> <li>Fulfilment of contractual loan obligations.</li> </ul>



Stakeholder Group	Stakeholders	Specific Interest in the Project
Insurance companies	<ul style="list-style-type: none"> <li>○ JSC SK "Eurasia".</li> <li>○ JSC IC "Amanat".</li> <li>○ JSC SK "London Almaty" and others.</li> </ul>	<ul style="list-style-type: none"> <li>○ Fulfilment of contractual obligations.</li> <li>○ Timely notification of insurance cases.</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>○ Organisations (individual entrepreneurs, limited liability companies, JSC) supplying goods, works and services on contractual terms.</li> </ul>	<ul style="list-style-type: none"> <li>○ Timely payment.</li> <li>○ Long-term cooperation.</li> </ul>
Partners	<ul style="list-style-type: none"> <li>○ TMTM Sea ports.</li> <li>○ Caspian basin.</li> <li>○ Agency companies.</li> <li>○ Shipping companies.</li> <li>○ Fishery Committee.</li> <li>○ Caspian Seals Research and Rehabilitation Center.</li> </ul>	<ul style="list-style-type: none"> <li>○ Stable client growth.</li> <li>○ Brand recognition which has positive impact on commercial success.</li> <li>○ Quality of services.</li> <li>○ Complaints from partners regarding the Port's activities.</li> </ul>
Media	<ul style="list-style-type: none"> <li>○ Qazaqstan TV channel.</li> <li>○ MAŃĠYSTAÝ TV channel.</li> <li>○ Lights of Mangistau regional socio-political newspaper, etc.</li> </ul>	<ul style="list-style-type: none"> <li>○ Information about the Project, its progress, and its E&amp;S impacts.</li> <li>○ Cooperation with the Company on covering its activities, provision of information to the public and other interested parties.</li> </ul>
NGOs	<ul style="list-style-type: none"> <li>○ Eco-Mangistau<sup>6</sup></li> <li>○ Alliance of legal entities Regional association of NGOs of West Kazakhstan "Tabigi Orta".</li> </ul>	<ul style="list-style-type: none"> <li>○ Monitoring Project progress and tracking how their views / suggestions regarding Project implementation have been taken into account.</li> <li>○ E&amp;S impacts associated with the implementation of the Project.</li> </ul>

<sup>6</sup> <https://www.ecomangystau.kz>

## 5 STAKEHOLDER ENGAGEMENT PROGRAMME

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### 5.1 PROGRAMME

- 5.1.1 The stakeholder engagement programme presented in Table 5-1 outlines a methodological approach for the Port to inform and engage with stakeholders throughout the Project lifecycle, including both the construction and operational phases.
- 5.1.2 The Port will use the list in Appendix A to track stakeholder engagement activities, which outlines the engagement activity, relevant stakeholders, the form of engagement (such as meetings, surveys, workshops), feedback from stakeholders, the actions the Port will implement, monitoring of these actions, the individuals and committees within the Port that are responsible for actions, and deadlines for those actions.

Table 5-1 Stakeholder Engagement Programme

No	Activity	Target group	Information Materials	Timeframe	Responsible party	Means of communication/location
1.1	Adopt and disclose the Project's E&S documents: SEP and Non-Technical Summary (NTS)	All stakeholders	Final Draft SEP, and NTS (in English and Kazakh)	July 2025	JSC NC ASCP and the Consultant	Project webpage on the Company website
1.2	Establish a Project grievance mechanism and notify the public about it	All stakeholders	SEP, notification, web-site posts	July 2025	JSC NC ASCP and the Consultant	Project webpage on the Company website
1.3	Prepare and publish the Annual E&S Report and publish it on the Company website	All stakeholders	Annual E&S Report (in Russian, Kazakh and English)	July – August 2026, then annually	JSC NC ASCP	Company website
1.4	Prepare a summary of the Annual E&S Report to be easily understandable by all stakeholders	All stakeholders; special attention should be paid to affected parties	Summary of the Annual E&S Report (in Russian and Kazakh)	July – August 2026, then annually	JSC NC ASCP	Company website
1.5	Conduct annual meetings with stakeholders to discuss the E&S Annual Report	All stakeholders; special attention should be paid to the local communities and vulnerable groups	Annual E&S Report (in Russian, Kazakh and English) Summary of the E&S Annual Report (in Russian and Kazakh)	July – August 2025 then annually	JSC NC ASCP	Umirzak / Aktau
1.6	Post updates / news about the Port's current operations, planned activities, achievements and any relevant E&S news	All stakeholders	Publications on the Port's website and selected important news in the media	Whenever there are relevant news and updates to share	JSC NC ASCP	Company website; When relevant - national, regional and/or district media

No	Activity	Target group	Information Materials	Timeframe	Responsible party	Means of communication/location
1.7	Provide information on the Project status and E&S issues on the Company's website and in the national, regional and local mass media	All stakeholders	Publications on the Project status and E&S news	July – August 2025, publications should be issued at least quarterly during construction	JSC NC ASCP	National, regional and district media Company website
1.8	In case of expressed interest from the stakeholders conduct public meetings to discuss Project-related issues	All stakeholders	Final Draft SEP, and NTS (in English and Kazakh)	In case of expressed interest	JSC NC ASCP and the Consultant	Umirzak / Aktau
1.9	Hold face-to-face meetings with interested stakeholders living in the vicinity of the Port	All stakeholders; special attention should be paid to residents and local authorities-akimats of the nearest settlements	Project webpage on the Company website	Annually	JSC NC ASCP	Project webpage on the Company website

## 6 PUBLIC GRIEVANCE MECHANISM

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### 6.1 GRIEVANCE RECORDING AND RESOLUTION

#### The Company's current grievance mechanism

- 6.1.1 The Company's Documentation Management department records all incoming written requests and grievances, which are then forwarded to the relevant departments for response. The process is specified in the Company's standard СТП АМПТ 004-24 on Document Management [2024].
- 6.1.2 There are four categories of appeals/requests: from legal entities, from workers, from private individuals, and collective appeals. The Port is required to respond within 15 working days. To receive a written response, complainants must provide full identification, including name, phone number, and address.
- 6.1.3 Additionally, the managing company (KTZ) operates a hotline that allows individuals to submit anonymous concerns. In addition, in compliance with EBRD PR10, the anonymity of complaints will be protected, ensuring there is an option for complainants to send grievances without the Port recording any of their personal information.

#### Project grievance mechanism

- 6.1.4 To ensure the confidentiality, anonymity, and accurate record-keeping, the grievance log and grievance form presented in Appendix B and Appendix C will be used, alongside the Company's current grievance mechanism, throughout the Project.

### 6.2 EBRD'S INDEPENDENT PROJECT ACCOUNTABILITY MECHANISM

- 6.2.1 The EBRD's complaint mechanism, or Independent Project Accountability Mechanism (IPAM), is independent from the EBRD's management and operates according to the EBRD's Project Accountability Policy (PAP). The IPAM aims to enable the resolution of environmental, social and public disclosure issues about EBRD-financed projects raised by project-affected people and civil society organisations. Although the IPAM is a last resort and complainants are advised to initially approach the project developer or the EBRD project team, if an individual has fear of retaliation due to the complaint, they can contact IPAM directly via the email address: [cso@ebrd.com](mailto:cso@ebrd.com).

### 6.3 GBVH INCIDENTS

- 6.3.1 The Port will appoint clear points of contact for GBVH incidents for internal and external stakeholders. Both the workers' and public/client grievance mechanisms will ensure the anonymity and confidentiality of complainants. Information on how the Port addresses the GBVH issues will be communicated to all stakeholders.

## 7 MONITORING AND REPORTING

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### 7.1 SEP REVIEW

- 7.1.1 Successful stakeholder engagement depends on continuous effort, performance monitoring and evaluation, and adapting to changing conditions and stakeholder information needs. In order to successfully organise, implement, evaluate and report on the stakeholder engagement activities, a special person will be appointed to be responsible for these processes.
- 7.1.2 The following indicators will be used for monitoring and improving stakeholder engagement activities to support the Project implementation;
- The SEP is developed, regularly updated, and available to the public for review/commenting.
  - Actions listed in the SEP are completed in full and as scheduled.
  - Topics discussed and questions raised during the public consultations.
  - Number of stakeholders' comments and suggestions received through various feedback channels disaggregated by gender of the senders (where possible).
  - Number of stakeholders' grievances and claims received disaggregated by gender of the senders (where possible).
  - Number of articles covering Project implementation in local, regional and national media.
  - Key categories of grievances received by the Company or its contractors (employment, permanent or temporary land use, environmental issues, labour relations, etc.).
  - Number of grievances resolved within the maximum established timeline.
  - Number of grievances remaining unresolved.
- 7.1.3 The SEP should be revisited as necessary, but at least every two years, by the Company in order to identify activities that might need any corrective and/or preventative measures with the purpose of improving the efficiency of its implementation. In such cases, the SEP should be updated and shared with the public with the notification of amendments made.
- 7.1.4 The outcomes of the stakeholder engagement process will be analysed on a monthly and quarterly basis, and a summary of the analysis will be included in the Annual E&S Reports submitted to the EBRD. Stakeholder engagement activities will be recorded in a specific log (Appendix A).



## 8 APPENDICIES

### APPENDIX A: STAKEHOLDER ACTIVITY LOG

Ref No.	Name of Engagement Activity	Stakeholder Group	Form of Engagement	Date of Activity:	Feedback	Actions Arising	Action Monitoring, Responsible Person(s) and Deadline

## APPENDIX B: GRIEVANCE LOG

Ref No.	Date Grievance Logged	Name / Anonymous	Contact Details (phone number/ email)	Grievance Details	Responsible Person(s)	Initial Response Date	Actions taken	Resolution Date
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APPENDIX C: GRIEVANCE FORM

JSC NATIONAL COMPANY AKTAU SEA COMMERCIAL PORT GRIEVANCE FORM

First Name(s) and Surname(s):

Contact Details:

Telephone No:

Email address:

If you wish to submit an anonymous complaint, please tick this box and do not add your contact details above:

☐

Note that the Company cannot respond to complaints provided anonymously to provide updates on actions taken and resolutions.

Grievance description/explanation:

Preferred language of communication: