



REPORT

Mirny (Kazakhstan) 1GW Wind Farm Project

Human Rights Risk Assessment

Submitted to:

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APPENDIX A

Human rights definition and screening

7.0 HUMAN RIGHTS RISK ASSESSMENT

This chapter is the Human Rights Risk Assessment (“HRRA”), part of the ESIA process, in relation to the construction and operation of the Mirny onshore wind farm installed in Kazakhstan.

7.1 Objectives of the human rights screening

The objective of this HRRA is to highlight the contextual and project specific risks at an early stage, allowing the outcome of this screening to be incorporated into the ESMPs for the Project implementation and thereby managing adverse human rights impacts potentially generated by the Project.

The human rights screening has been carried out to meet the expectations set by the UN Guiding Principles on Business and Human Rights¹ and the Equator Principles IV, as outlined in the Guidance Note on implementation of human rights assessments under the Equator Principles, 2020. Depending on the outcome of the screening, a human rights impact assessment may be required.

It is important to note that for this ESIA study, Aktas Energy has adopted Total Energies’ corporate standards and guidelines applicable to the Project.

7.2 Methodology and Scope

To ensure a systematic approach is taken for the HRRA, WSP Italy developed a methodology to investigate human rights risk for the Project. The objective of the risk assessment is to identify how and where business activities might have an impact on internationally recognised human rights. The methodology is aligned with international frameworks and stakeholder expectations, notably the UN Guiding Principles (“UNGPs”) on Business and Human Rights.

The risk assessment was conducted using a structured, multilayered approach. At the initial stage, project documents have been analysed to determine the scope. As a second stage, country risks were identified and prioritised through a comprehensive review of data sourced from internationally recognised standards and indices. This macro-level analysis provided insight into the broader governance and regulatory and social conditions relevant to the project.

Building upon the country risk assessment, a more detailed project-level evaluation was undertaken. This phase aimed to determine the relevance and severity of identified risks within the specific operational context. The assessment of severity is guided by the UNGPs which emphasise three key dimensions: scale (gravity or seriousness of the impact), scope (number of people affected by the impact) and remediability (if the harm is reversible).

This framework enabled a nuanced understanding of risk exposure; ensuring that the assessment not only captured the likelihood of risks but also their human rights implications and the organisations capacity to respond effectively.

The table below provides the structure of the process carried out:

¹ “The client is expected to include assessments of potential adverse Human Rights impacts and climate change risks as part of the ESIA or other Assessment, with these included in the Assessment Documentation. The client should refer to the UNGPs³ when assessing Human Rights risks and impacts.”

Table 1: Process flow

PROCESS	
Stage 1 - Review of the business and project activities and processes	The project description and the baseline that have been carried out for the project have been analysed to provide structure for the analysis. The baseline has been completed as part of the ESIA process to which this document is complemented.
Stage 2 - Country Human rights risk assessment	Desk-based research on the country's human rights situation has been carried out in order to have a baseline to evaluate impacts. The country's risk might increase the likelihood that the Project will not be able to enforce human rights legislations.
Stage 3 - Project- specific human rights risk assessment	A screening used to select which human rights will or will not be impacted by the Project and thus then analysed, is present in APPENDIX A. Based on the outcomes of this screening, the Project specific analysis is used to describe what are the Project's potential adverse impacts on specific human rights and provide some recommended mitigation measures.

Stage 1 is not dealt with in detail in this document because it is an earlier stage in which we move on to the analysis of available project documents, during the ESIA stage, such as -among others - the project description, project baseline, SEP, the analysis of documents made available by the Client. This HRRRA document then goes directly to the description of stage 2 and stage 3.

Scope of the Assessment: While defining the scope, the assessment has taken into account two key considerations:

Applicable legal framework including alignment with international human rights standards and national framework: Both the country- level and project-level risk assessments were conducted in alignment with internationally recognised human rights frameworks. Specifically, the assessment drew upon the international human rights framework along with the guidelines and performance standards established by the EBRD and IFC.

Supply Chain Considerations: The scope of the assessment also extended to the projects operational supply chain. Risks were evaluated with respect to both direct operations and upstream supplier activities. However, the supply chain due diligence component remained limited due to the absence of comprehensive data on existing suppliers at the time of the assessments. As such, the analysis was restricted to only two suppliers and publicly available and internationally provided information on known suppliers and raw material (in which the traceability is known to be low). This limitation is acknowledged, and future assessments are recommended to the client for incorporating more extensive supplier engagement and data collection to strengthen the due diligence process.

Methods: The primary method employed for this assessment (including due diligence for supply chain) is desk-based research, which involves the systematic review of existing secondary resources. To identify country level human rights risks, data were collected through comprehensive analysis of internationally recognised indices, United Nations platforms, global databases, and reputable online media resources. The selection of resources was guided by considerations of credibility, reliability, and relevance to the assessment scope.

For the project-level risk assessment, the desk-based review was extended to include country specific-statistics, demographic data, local media coverage, and project related documentation. This approach enabled contextualised understanding of potential human rights within the operational environment of the project. To ensure a comprehensive understanding of risk likelihood, an in-depth review was conducted of the project documents and client's labour and land management plans, due diligence processes and relevant policies and procedures.

As noted above, limitations were encountered in the assessment of supply chain-related risks due to the lack of comprehensive data on existing suppliers. For suppliers where information was available, the desk-based review was restricted to publicly accessible sources, which constrained the depth of analysis. Given the preliminary nature of this review, the client was advised to undertake a more thorough due diligence process to assess the relevance and severity of identified risks—particularly those concerning child labour, forced labour, and land-related conflicts.

While a dedicated stakeholder engagement process was not undertaken specifically for the purpose of human rights risk identification, relevant data and observations gathered during visits conducted (please refer to the Project Stakeholder Engagement Plan for further details) were incorporated into the assessment. Additionally, insights from the existing stakeholder management plan were used to inform the evaluation of risks.

7.3 Human rights screening

7.3.1 Country Risks

The contextual human rights risks are identified using several available sources to determine the risk associated to:

- Governance and sector risks;
- Social and community risks;
- Civil rights risks;
- Workers' rights risks; and
- Gender risks related to equal opportunity, protection against gender-based violence, legal status and property rights.

For each of these risks, indicators have been identified and various recognized and international sources of data have been used to assess the risks related to each indicator.

The table below includes links to the sources used for the different parts of the assessment.

Four levels of risks have been used in the risk assessment of contextual risk as in the following table:

Table 2: Colour code

Very High
High
Medium
Low
No risk

The highest scores (**red**) reflect the most salient impacts identified by this study. The risk level is based on thresholds set by the index or resources used as described below, or by the score that Kazakhstan holds compared to rest of the world for specific indicators.

The human rights screening indicates the risk levels identified at national level and applies them to the Project, bringing more attention to which human rights are most at risk of being violated and provides practical mitigation measures to make it easier for the Client to respect them.

Particular attention should be given in the Project risk assessment to indicators assessed to be medium or high risk. It is important to specify that the risk level identified is not indicative of the ultimate risk that the Project will have on human rights, but it is a screening that allows the Client to focus on the most vulnerable areas and prevent through appropriate mitigation measures.

7.3.1.1 Governance risks

Indicator	Information on indicator	Risk level	Comment
Stability of the country	<p>The Fund for Peace, Fragile States Index ("FSI") has been used to assess the risk related to instability in Kazakhstan. The index is based on a conflict assessment framework assessing the vulnerability of states to collapse. The methodology uses both qualitative and quantitative indicators, relies on public source data, and produces quantifiable results. Twelve conflict risk indicators are used to measure the condition of a state at any given moment. The index generates an annual ranking list. Maximum score 120 = Fragile; Minimum score 0 = Stable: The higher the score, the higher the risk.</p> <p>Link: Fragile State Index</p>	Medium	<p>According to the FSI portal, in 2024 Kazakhstan has reached a score of 57.8 (max. 120) and ranks 115th out of 179 countries.</p> <p>Over the previous year, the change in points was -2.8 indicating an overall positive change for the country towards a more stable outlook.</p> <p>According to the 2024 Fragile States Index Heat Map, Kazakhstan falls between the "Stable" and "Warning" country categories, showing an improvement from 2023 when it was classified as "Warning".</p>
Governance quality	<p>The Worldwide Governance Indicators ("WGI") project reports aggregate individual governance indicators for six dimensions of governance. For assessing the risk in Kazakhstan, all the six dimensions have been included:</p> <ol style="list-style-type: none"> 1) Voice and Accountability 2) Political Stability and Absence of Violence/Terrorism 	Medium	<p>The results obtained in 2023 for the six selected indicators indicate that Kazakhstan has higher scores compared to the scores recorded for its neighbouring countries in Central Asia (eg. Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan, ...), thus indicating better levels of governance in the country and a positive trend compared to the results of previous years.</p>

	<p>3) Government Effectiveness</p> <p>4) Regulatory Quality</p> <p>5) Rule of Law</p> <p>6) Control of Corruption.</p> <p>The higher the score, the lower the level of risk.</p> <p>Link: Governance Quality Index</p> <p>Percentile rank (0-100): indicates rank of country among all countries in the world, 0 corresponds to lowest rank and 100 corresponds to highest rank</p>		<p>Kazakhstan's score is lower only in Indicator No. 1, "Voice and Accountability," while it is higher across the other indicators, placing the country in the medium-risk category.</p> <p>1) Voice and Accountability: 21.57 (10-25th percentile range)</p> <p>2) Political Stability and Absence of Violence/Terrorism: 36.49 (25- 50th percentile range)</p> <p>3) Government Effectiveness: 57.08 (50-75th percentile range)</p> <p>4) Regulatory Quality: 53.30 (50-75th percentile range)</p> <p>5) Rule of Law: 36.79 (25- 50th percentile range)</p> <p>6) Control of Corruption: 47.17 (25- 50th percentile range)</p>
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7.3.1.2 Social and community risks

Indicator	Information on indicator	Risk level	Comment
Land tenure security	For this assessment, the Global Property Rights Index was used. The Index is a collaborative initiative between Global Land Alliance and ODI which aims to develop and deploy the world's first	Low	Based on the data available from the year 2024, 12% of the adult population in Kazakhstan, feel insecure in their land and

Indicator	Information on indicator	Risk level	Comment
	<p>measure of people's perception of their property rights.</p> <p>The Property Rights Index measures the degree to which a country's laws protect private property rights and their enforcement. It assesses the likelihood of private property being expropriated and analyses the independence of the judiciary and the ability of individuals and businesses to enforce contracts. For higher index values, this reflects legal protection of property in the country.</p> <p>Link: Global Property Rights Index</p>		<p>property overall against 77% of the population feeling security in their tenure.</p> <p>7% of adult population fear that the owner or the renter may ask them to leave, while 1% of population feel that the Government may seize their property.</p> <p>The 56% of the residents hold formal documents with listed names, while the 28% of the residents hold formal documents with no listed names.</p> <p>The assessed structure of tenure for 2024 shows 51% of the adult population as owner, 7% as renters and 38% as family member owning the land.</p> <p>PRINDEX-Comparative Report-2024 - ENG - DIGITAL.pdf</p>
Human development	<p>Human development in Kazakhstan has been assessed using the human development index ("HDI"). The HDI is a composite index measuring average achievement in three basic dimensions of human development 1) long and healthy life, 2) knowledge 3) decent standard of living.</p> <p>The index generates an annual ranking list of 193 countries. 1= maximum; 0= lowest.</p> <p>Link: Human Development Index</p>	Low	<p>According to the 2023-2024 Human Development Report, Kazakhstan is ranked 67 out of 193 countries and it is the fifth country positioned under the region "Europe and Central Asia" out of 17 countries. Above Kazakhstan in the region, we can find Turkey, Montenegro, Georgia and Serbia.</p> <p>Kazakhstan's HDI is 0.802, it is classified in the "Very High" human development</p>

Indicator	Information on indicator	Risk level	Comment
			category, therefore the risk associated is low. Compared to 2021, Kazakhstan got an increase of 0.001, denoting a small improvement from the country. Historically, between 1990 and 2022, Kazakhstan's HDI value changed from 0.672 to 0.802, denoting a very positive improvement for the country which is set above the World's average HDI (0.739 in 2022).
Indigenous People	The International Work Group for Indigenous Affairs produces the "Indigenous World" report giving a comprehensive yearly overview of the developments indigenous peoples communities identified around the World. The report has been used to check 1) if there are Indigenous People in the country of interest, 2) if the ILO 169 has been ratified there and 3) If FPIC or an equivalent is known in the local law. Link: The Indigenous World 2024	No risk	There are no Indigenous people identified by the International Work Group for Indigenous Affairs under The Indigenous World 2024 report in Kazakhstan.

7.3.1.3 Civil Rights risks

Indicator	Information on indicator	Risk level	Comment
Civil society rights	<p>The CIVICUS Space Index has been used to assess the risk in Kazakhstan. The index combines data from a range of sources. Civic space is defined as 1) the respect in law and practice for the freedoms of association, 2) peaceful assembly and 3) expression. Built into each of the three core freedoms is the understanding that a state has a duty to protect civil society and must go beyond simply refraining from interfering in citizens' enjoyment of their rights. It provides a 5-scale ranking of countries.</p> <p>Link: CIVICUS Space Index</p>	High	<p>This assessment covers data on freedoms of expression, association and peaceful assembly from 2018 to 2024.</p> <p>According to published data, in 2024 Kazakhstan had a score of 31 out of 100 and had been classified as a “repressed” country, which means that there are still restrictions on the fundamental freedoms of civilians, human rights defenders and of organization and association in the country.</p> <p>On October 2024, the Government held a referendum for the construction of a nuclear power plant (NPP) in Kazakhstan, in the village of Ulken, near Lake Balkhash. 71% of voters supported the building of the NPP. Independent observers reported irregularities during the referendum, including the use of “carousel voting” and ballot stuffing, and the groundless removal of observers from polling stations.</p> <p>In addition, in the months preceding the referendum authorities stifled public discussion and expressions of dissent on the NPP issue (eg. denying permission for peaceful protests planned across the</p>

Indicator	Information on indicator	Risk level	Comment
			country on the day of the referendum and detaining activists beforehand to prevent demonstrations).
Human rights treaties ratification	<p>The number of Human Rights treaties ratified gives an insight on the country human rights protection and commitment.</p> <p>Link: Ratification of 18 Human Rights Treaties</p>	Low	<p>17 of the 18 International Human Rights Treaties have been ratified in Kazakhstan. Kazakhstan has taken no action for the following treaty:</p> <ul style="list-style-type: none"> ■ International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families: 1753.
Violations	<p>Relevant human rights criticalities and/or special procedures/communications observed by main UN international bodies (i.e. treaty bodies, Universal Periodic Review) in the country.</p> <p>Link: OHCHR UPR, 2025</p>	Medium	<p>As highlighted by the UN bodies, Kazakhstan has not yet ratified the following international Conventions:</p> <ul style="list-style-type: none"> ■ International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; ■ Kazakhstan has not yet ratified the International Labour Organization Violence and Harassment Convention, 2019 (No. 190);

Indicator	Information on indicator	Risk level	Comment
			<ul style="list-style-type: none"> ■ Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence. <p>Kazakhstan abolished the death penalty through a referendum held on 5 June 2022.</p> <p>Kazakhstan opened offices of the Commissioner for Human Rights in all regions in 2022.</p> <p>Kazakhstan has established new institutions for the defence of human right, such as the Ombudsperson for Children's Rights and the Commissioner for the Rights of Socially Vulnerable Categories of the Population, in February 2016 and 2023, respectively. The country also adopted the action plan on human rights and the rule of law in 2023.</p> <p>Kazakhstan approved the bill that distinguished the crime of torture from other forms of cruel, degrading or inhuman treatment.</p> <p>Hate and violence against minorities and vulnerable groups has increased in the past</p>

Indicator	Information on indicator	Risk level	Comment
			years, therefore the UN bodies recommend Kazakhstan to improve and increase measures to monitor, combat, investigate and prosecute racist hate speech incidents while ensuring that such measures were balanced with the right to freedom of expression.
Judiciary	<p>Effectiveness and independence of the judiciary system and rule of law.</p> <p>Link: UN Special Rapporteur on the independence of Judges and Lawyers OHCHR UPR, 2021</p>	Medium	<p>Right to life, administration of justice and torture is enshrined in the Constitution. The country has taken many measures to improve the administration of justice and combat impunity. For example, Kazakhstan has implemented the Automated Court Case Distribution System to enhance transparency and combat corruption. Judges and court staff are required to promptly report any attempts to interfere with the automated distribution of cases to designated officials responsible for court security and corruption prevention.</p> <p>However, improvements still need to be made as recommended by the UN bodies. Indeed, The Special Rapporteur on Terrorism expressed concern about the overreliance on “judicial experts” in both</p>

Indicator	Information on indicator	Risk level	Comment
			<p>pretrial and trial phases of extremism and terrorism procedures and about the lack of access to independent lawyers for defendants until their trial. It was recommended to protect the right to a fair trial in all terrorism and extremism cases and make such trials open and transparent.</p>
Global Freedom Status	<p>“Freedom in the World” is an annual global report on political rights and civil liberties, composed of numerical ratings and descriptive texts for each country and a select group of territories. The report’s methodology is derived in large measure from the Universal Declaration of Human Rights, adopted by the UN General Assembly in 1948. Freedom in the World is based on the premise that these standards apply to all countries and territories, irrespective of geographical location, ethnic or religious composition, or level of economic development. Freedom in the World operates from the assumption that freedom for all people is best achieved in liberal democratic societies.</p> <p>Freedom in the World uses a two-tiered system consisting of scores and status. Free, Partly Free, Not Free Status. The</p>	Very High	<p>Kazakhstan has been assessed in 2024 as a “Not free” country, with a score of 23/100. More specifically Kazakhstan scores 5/40 in political rights and 18/60 in civil liberties.</p> <p>The report main consideration are about Parliamentary and presidential elections which are considered neither free nor fair. Authorities have consistently marginalized or imprisoned opposition figures and the dominant media outlets are mainly state led. Freedoms of speech and assembly remain restricted and punished, and corruption is endemic.</p>

Indicator	Information on indicator	Risk level	Comment
	<p>combination of the overall score awarded for political rights and the overall score awarded for civil liberties, after being equally weighted, determines the status of Free, Partly Free, or Not Free</p> <p>Freedom House Expanding freedom and democracy</p>		
Human Rights Watch World Report	<p>Human Rights Watch investigates and reports on abuses happening in all corners of the world.</p> <p>Human Right Watch World Report (2023)</p>	High	<p>In 2023 Human Rights Watch reported numerous cases of human rights violations by authorities in Kazakhstan, including disproportionate use of force against protesters, arbitrary arrest and imprisonment, and ill-treatment and torture of detainees. Kazakhstan has rejected calls for an independent investigation with external experts into the events.</p> <p>The Government impose heavy restrictions on the rights to peaceful protest, freedom of speech, and freedom of religion.</p> <p>Domestic violence and torture are highly common in the country and they continue with impunity.</p> <p>Kazakhstan voted on constitutional amendments on June 5, 2023, in a national referendum. Changes included strengthening the status of the human rights</p>

Indicator	Information on indicator	Risk level	Comment
			commissioner and establishing a constitutional court.

7.3.1.4 Workers' rights risks

Indicator	Information on indicator	Risk level	Comment
Guarantee of workers' rights	<p>The ITUC Global Rights Index depicts the world's worst countries for workers by rating 148 countries on a scale from 1-5 based on the degree of respect for workers' rights.</p> <p>Scores are allocated in the following manner:</p> <ul style="list-style-type: none"> ▪ 5: No guarantee of rights ▪ 4: Systematic violations of rights ▪ 3: Regular violations of rights ▪ 2: Repeated violations of rights ▪ 1: Sporadic violations of rights <p>Link: The ITUC Global Rights Index 2024</p>	Very High	According to the data provided by ITUC Global Rights Index 2024, Kazakhstan has a score of 5 and is classified in the category of countries with no guarantee of rights.
Ratification of core labour standards	<p>The number of core labour standards ratified represent a set of four fundamental, universal, and indivisible human rights and are enshrined in eight International labour Organization's ("ILO") conventions:</p>	Medium	<p>Kazakhstan has ratified all 10 fundamental conventions of the ILO:</p> <ul style="list-style-type: none"> ▪ C029, Forced Labour Convention, 1930 (No. 29)

Indicator	Information on indicator	Risk level	Comment
	<ul style="list-style-type: none"> ■ Freedom from forced labour: No. 29 and 105 ■ Freedom from child labour: No. 138 and 182 ■ Freedom from discrimination at work: 100 and 111 ■ Freedom to form and join a union, and to bargain collectively: No. 87 and 98 <p>Link: Ratifications by country (ilo.org)</p> <p>Supervising the application of International Labour Standards</p>		<ul style="list-style-type: none"> ■ C087, Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) ■ C098, Right to Organise and Collective Bargaining Convention, 1949 (No. 98) ■ C100, Equal Remuneration Convention, 1951 (No. 100) ■ C105, Abolition of Forced Labour Convention, 1957 (No. 105) ■ C111, Discrimination (Employment and Occupation) Convention, 1958 (No. 111) ■ C138, Minimum Age Convention, 1973 (No. 138) ■ C155 - Occupational Safety and Health Convention, 1981 (No. 155) ■ C182, Worst Forms of Child Labour Convention, 1999 (No. 182) ■ C187, Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187) <p>However, observation on the application of these Conventions (C029, C081, C105, C129, C138, C182) has been made by the</p>

Indicator	Information on indicator	Risk level	Comment
			Committee of Experts. Direct request on the application of these Convention have been made: C029, C081, C105, C129, C138, C182.
Living wage gaps	<p>Several sources have been used to assess the level of risk related to living wage gaps in Kazakhstan. The following indicators have been included in the assessment:</p> <ul style="list-style-type: none"> ■ Presence of minimum wage; ■ Year of last minimum wage update higher than 10 years (google search); ■ Significant delta between minimum wage and living wage; ■ Minimum wage below international poverty line (USD 1.90/day or 57 USD/month). <p>Links: ILO Statistics Wage Indicator</p>	Lower	<p>According to the data collected on the Wage Indicator, the current minimum wage in Kazakhstan is KZT85,000.00 per month in 2025. It became valid on January 1, 2024. Minimum wage is calculated for work under normal conditions with fulfilment of the set monthly work norm. According to Article 77 of the Labour Code of the Republic of Kazakhstan normal working hours should not exceed 40 hours per week.</p> <p>The minimum wage in Kazakhstan is above the international poverty line (57 US dollars per month) considering that the minimum wage is set at approximately 162,70 US dollars, based January 1, 2024 exchange rates.</p>
Forced and child labour	<p>The Report presents:</p> <ul style="list-style-type: none"> ■ Findings on the prevalence and sectoral distribution of the worst forms of child labour in each country. 	High	<p>Kazakhstan is categorized as a country that made “minimal advancement”.</p> <p>In 2023, Kazakhstan made minimal advancement in efforts to eliminate the</p>

Indicator	Information on indicator	Risk level	Comment
	<ul style="list-style-type: none"> ■ Country-specific suggestions for government action (since 2009). ■ Individual country assessments that identify where Significant, Moderate, Minimal, or No Advancement has been made (since 2011). <p>Link: International Child Labour & Forced Labour Reports U.S. Department of Labour</p>		<p>worst forms of child labour. Children are mostly subjected to child labour in agriculture (harvesting cotton), and commercial sexual exploitation, sometimes as a result of human trafficking. Children also engage in child labour in construction and road repair and catering services. 90.7% of children aged 5 to 14 years old in 2023 were working and 3.6% alternating work and school.</p> <p>In December 2023, Kazakhstan's Parliament ratified the United Nations Optional Protocol to the Convention on the Rights of the Child on a Communications Procedure. In addition, Kazakhstan created Territorial Mobile Teams in 2023, which include police, prosecutors, labour inspectors, and non-governmental organization representatives, and travel to remote rural areas to carry out explanatory work among the population and immediately respond to reports of forced labour on farms. The government also provided law enforcement authorities with targeted training on detecting and prosecuting child labour and child trafficking and conducted many public awareness campaigns on these issues.</p>

Indicator	Information on indicator	Risk level	Comment
			However, despite these efforts, Kazakhstan is assessed as having made only minimal advancement because on December 30, 2021, the President of Kazakhstan signed a law significantly restricting the circumstances under which unannounced inspections can be performed. The lack of unannounced inspections may leave potential violations of child labour laws and other labour abuses undetected in workplaces. In addition, the government extended a moratorium until January 1, 2024, under which labour inspections of small enterprises were permitted only in cases that pose a mass threat to life and health, law and social order, or national security. The government also lacks current, comprehensive, and detailed research on child labour, including in cotton production.
Modern Slavery	The Global Slavery Index ("GSI") provides national estimates of modern slavery for 160 countries. Modern slavery includes forced labour, forced or servile marriage, debt bondage, forced commercial sexual exploitation, human trafficking, slavery-like practices, and the sale and exploitation of children.	Very High	Kazakhstan ranks 17th in the Global Slavery Index 2023 for prevalence (11.1 people every 1000 people). The country ranks 9th in the regional rank, Europe and Central Asia, after Belarus.

Indicator	Information on indicator	Risk level	Comment
	<p>The index has three indicators:</p> <ul style="list-style-type: none"> ■ Prevalence and numbers: these national estimates of the prevalence per thousand people and number of people were calculated using individual and country-level risk factors of modern slavery. The analysis draws on thousands of interviews with survivors of modern slavery collected through nationally representative household surveys; ■ Vulnerability: The vulnerability model estimates how vulnerable people in a country are to modern slavery and in what ways; ■ Government response: The government response assessment provides a comparative look at the legal, policy, and programmatic actions that governments are taking to respond to modern slavery; <p>Link: Global Slavery Index 2023</p>		
Sector risk	<p>According to the economic sector risk classification of UNEP FI, there are five Human Rights Sector risk indicators:</p> <ul style="list-style-type: none"> ■ Workforce and Modern Slavery 	Medium	Subcategory “Power generation” is ranked as fifth on the list of Human Rights Risk Indicator Ranking per sector. It means that the sector has high risk in at least 1 category

Indicator	Information on indicator	Risk level	Comment
	<ul style="list-style-type: none"> ■ Health and Safety ■ Livelihood and Environment ■ Indigenous Peoples' Rights ■ Workplace Conditions <p>Subcategory risks are defined and assessed for each human rights risk indicator. Risks were scored for each risk indicator based on the following ranking criteria.</p> <ul style="list-style-type: none"> ■ Very High Risk: Sector has high risk in the workforce and modern slavery indicator and high risk in two or more distinct indicators; ■ High Risk: Sector has high risk in the workforce and modern slavery indicator or high risk in two or more distinct categories; ■ Medium Risk: Sector has high risk in at least one indicator and medium risk in more than two distinct indicators; ■ Low Risk: Sector has high risk in one indicator and medium risk in two or less distinct indicators; <p>Link: Sector Risk Source - UNEP FI: https://www.unepfi.org/</p>		<p>and medium risk in more than 2 distinct categories.</p> <p>The sector scores high risk in Health and Safety, medium risk in Local, traditional and Indigenous People's Right, Livelihood and Environment and Workplace Condition indicators. The sector scores low risk in Workforce (including Modern Slavery).</p>

7.3.1.5 Gender risks

Indicator	Information on indicator	Risk level	Comment
Gender-based violence and harassment (GBVH)	<p>The levels of violence against women and girls in Kazakhstan have been informed through several sources. Although no direct correlation has been established between risk of sexual exploitation and abuse (SEA) within a project and the levels of Gender-based violence in countries, the statistic does give an indication of the country context within which the project is implemented.</p> <p>UN Women provides data monitoring on SDGs from a gender perspective.</p> <p>Links: UN Data Women</p> <p>Global Database on violence against women</p>	High	<p>In Kazakhstan, 7% of women aged 20–24 years old who were married or in a union before age 18. The adolescent birth rate is 19.7 per 1,000 women aged 15–19 as of 2022, down from 23.8 per 1,000 in 2021. In 2018, 73.2% of women of reproductive age (15-49 years) had their need for family planning satisfied with modern methods.</p> <p>77.8% of legal frameworks that promote, enforce and monitor gender equality under the SDG indicator, with a focus on violence against women, are in place. As of February 2024, only 19.4% of seats in parliament were held by women. In 2023², 16.5% of women aged 18-75 reported experiencing physical and/or sexual violence perpetrated by intimate partner. Also, women and girls aged 15+ spend 19.9% of their time on unpaid care and domestic work, compared to 6.3% spent by men.</p>
Legal gender barrier	The World Bank's Women, Business and the Law report monitors laws and policies	Low	Kazakhstan scores 75.6 out of 100 in the Women, Business and the Law 2024 report,

² [SDG Report WEB](#)

Indicator	Information on indicator	Risk level	Comment
	<p>affecting women's economic activity. The report assesses legal gender barriers across seven indicators: accessing institutions, using property, getting a job, providing incentives to work, going to court, building credit, and protecting women from violence. The report uses formal laws as a starting point for analysis, and the report's indicators—defined below—were selected based on input from legal practitioners around the world.</p> <ul style="list-style-type: none"> ■ Mobility: Examines constraints on freedom of movement ■ Workplace: Analyses laws affecting women's decisions to work ■ Pay: Measures laws and regulations affecting women's pay ■ Marriage: Assesses legal constraints related to marriage ■ Parenthood: Examines laws affecting women's work after having children ■ Entrepreneurship: Analyses constraints on women's starting and running businesses 		<p>scoring lower compared to the regional average in Europe and Central Asia (85.8). The country has some constraints mostly on laws affecting pension conditions and in particular different range of benefits between women and men.</p> <p>Kazakhstan scores 100 in the following indicators:</p> <ul style="list-style-type: none"> ■ Mobility ■ Marriage ■ Assets <p>While it scores the following in the other indicators:</p> <ul style="list-style-type: none"> ■ Workplace: 50 ■ Pay: 75 ■ Parenthood: 80 ■ Entrepreneurship: 75 ■ Pension: 25

Indicator	Information on indicator	Risk level	Comment
	<ul style="list-style-type: none"> ■ Assets: Considers gender differences in property and inheritance ■ Pension: Assesses laws affecting the size of a woman's pension <p>These eight indicators measure legal differences between men and women at different stages of their working life.</p> <p>Thirty-five aspects of the law are scored across eight indicators of four or five binary questions. Each indicator represents a different phase of a woman's career. The methodology was designed as an easily replicable measure of the legal environment for women as entrepreneurs and employees. We update the data based on feedback from respondents with expertise in laws on family, labour and violence against women. Indicator-level scores are obtained by calculating the unweighted average of the questions within that indicator and scaling the result to 100. Overall scores are then calculated by taking the average of each indicator, with 100 representing the highest possible score.</p>		

Indicator	Information on indicator	Risk level	Comment
	<p>The global average Women, Business and the Law score is 77.1 out of 100 in 2022, only half a point higher than in 2021.</p> <p>Links: Women, Business and the Law</p>		
Women's economic opportunities	<p>Women, Business and the Law 2.0 opens a new frontier for measuring women's rights and provides an encompassing picture on women's economic opportunities. It presents new data and analysis of (1) the laws affecting women's economic participation, (2) the frameworks supporting the implementation of those laws, and (3) the opinions of experts on the outcome of laws for women (figure 3.1). In doing so, it offers a more complete picture of the enabling environment for women's economic participation.</p> <p>The three pillars reinforce each other. For instance, laws can promote the creation of supportive frameworks. At the same time, supportive frameworks can encourage the formalization of laws. Moreover, perceptions of women's rights can drive change but also can be influenced by the state of legal and supportive frameworks. These pillars are mutually necessary and critical to achieving</p>	Medium	<p>Kazakhstan's Women, Business and the Law 2.0 (WBL 2.0) legal frameworks score is 70.0 out of 100, above the global average (64.2) but below the regional average for Europe & Central Asia (77.0). The country scores perfectly (100.0) in areas such as freedom of movement, marriage-related constraints, childcare laws, and property and inheritance rights. However, its lowest score is in laws affecting women's safety, which could be improved by introducing legislation on femicide, comprehensive sexual harassment laws, and child marriage regulations.</p> <p>Kazakhstan's supportive frameworks score is 62.5, exceeding both the global (39.5) and regional (51.3) averages. It achieves a perfect score in supportive frameworks related to marriage, business, and pensions. However, one of its weakest areas is workplace-related support. Enhancements could include publishing gender non-discrimination guidelines,</p>

Indicator	Information on indicator	Risk level	Comment
	<p>women's rights. To delve deeper into the methodology, visit the data notes section on the Women, Business and the Law website, http://wbl.worldbank.org.</p> <p>Link: WBL24-2-0-Kazakhstan.pdf</p>		<p>providing flexible work arrangement policies, and establishing a specialized body for gender discrimination complaints.</p> <p>The expert opinions score for Kazakhstan stands at 76.3, surpassing both the global (65.7) and regional (75.2) averages. The country receives perfect scores in expert opinions on freedom of movement and property rights but scores lower on women's safety, highlighting the need for further legal and policy improvements.</p>
Workplace equality	<p>The Council on Foreign Relations have created the "Women's Workplace Equality Index" which measures the global progress toward gender equality in 189 economies by identifying the laws and regulations that restrict and incentivize women's economic participation.</p> <p>The project presents seven indicators structured around women's interactions with the law as they progress through their lives and careers: 1) Accessing institutions, 2) Building credit, 3) Getting a job, 4) Going to court, 5) Protecting women from violence, 6) Providing incentives to work, 7) Using property.</p>	Medium	<p>Kazakhstan has a score of 61.9 out of 100, it is ranked 20th out of 25 in Europe and Central Asia, 30th out of 51 in the Upper Middle-Income Group and 107th out of 189 globally.</p> <p>Scores for the indicators assessed that are the lowest are in building credit (0 out 100) and protecting women from violence (25 out 100).</p> <p>Scores are lower for building credit due to the following:</p> <ul style="list-style-type: none"> ■ Retailers and utilities do not provide information to private credit bureau or public credit registries, impeding

Indicator	Information on indicator	Risk level	Comment
	<p>Countries are ranked by assigning each an overall average score from 0 to 100, a higher score means better performance.</p> <p>Link: Women's Workplace Equality Index</p>		<p>women from building their credit histories to access finance;</p> <ul style="list-style-type: none"> ■ The law does not prohibit discrimination by creditors on the basis of sex, gender or marital status. <p>Finally, scores are lower for protecting women from violence due to the following:</p> <ul style="list-style-type: none"> ■ There is no law prohibiting sexual harassment in the workplace nor in school and there is no law explicitly criminalizing marital rape; ■ There are no criminal penalties nor civil remedies for sexual harassment in the workplace; ■ There are no clear criminal penalties for domestic violence.
Gender gaps	<p>The Global Gender Gap Index 2023 benchmarks 146 countries in the current state and evolution of gender parity across four key dimensions 1) Economic Participation and Opportunity, 2) Educational Attainment, 3) Health and Survival, and 4) Political Empowerment.</p> <p>Link: Global Gender Gap Report 2024</p>	Medium	<p>The assessment made by the Global Gender Gap Index in 2024, allowed to attribute a score of 0.710 to Kazakhstan and the country ranks 76th out of 146 countries.</p> <p>The labour force participation rate is 63.30% for women compared to 74.60% for men, the percentage of legislators, senior officials and managers female are 40.79% compared to 59.21% males. The percentage of women in parliament are</p>

Indicator	Information on indicator	Risk level	Comment
			19.40% compared to 80.60% males and 14.29% women in ministerial position compared to 85.71% men in ministerial position.

7.3.2 Project Specific Human Right Risks

In the following section Project specific human rights risks are assessed. The table includes human rights listed in the International Bill For Human Rights, which considers the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights ("ICCPR"), and the International Covenant on Economic, Social and Cultural Rights ("ICESCR"). For human rights integrated in the IFC PSs, links to the relevant standard are included in the table. The assessment of risk level takes into consideration the outcome of the country risks' analysis. While risk level allocations in some instances follow the risk level of the country risk, in many cases the Project specific risks are assessed to be lower or higher, due to the characteristics of the Project.

An initial screening of the human rights potentially impacted by the Project has been performed and is presented in APPENDIX A, with the full definition of each human right.

The risk assessment has then been performed only on the human rights identified as potentially impacted. Four levels of risks are used in the risk assessment of the Project human rights risks as well (Very high, High, Medium, Lower). Positive impacts appear green. Risk scoring is according to two dimensions - the severity of the risk and the likelihood. The guiding principle on business and human rights defines severity according to scale, scope and remedability. In this sense a high level of risk is allocated according to how severe the potential impact is (scale), how many people are potentially affected (scope) e.g., an individual or an entire workforce, and whether potential impacts are difficult to remediate.

As mentioned, the risk level identified is not indicative of the ultimate risk that the Project will have on human rights, but it is indeed a screening that allows the Client to focus on the most critical areas. For each human right screened, recommended mitigation measures that will be applied by the client to manage the risks and reduce them to an acceptable limit are recommended.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
Right to equality before the law, equal protection of the law, non-discrimination	ICESCR 2 ICCPR 2	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8	Medium	<p>The gender gaps in Kazakhstan are significant as explained in previous table.</p> <p>The Project will directly and indirectly involve a large number of workers in both phases of construction and operation, potentially coming from different countries as well. The hiring process and general working conditions must ensure non-discrimination and equal opportunities at all levels.</p> <p>It is noted that employment during the construction is likely to be male dominated considering the activities with few women employed in the construction sector, hence increasing the risks of unbalanced workforce conditions. During the operation phase the risk may be reduced because of</p>	<ul style="list-style-type: none"> ■ Develop and implement a Human Resource Policy with clear commitment to guarantee workers well being and decent conditions. ■ Develop and implement a Code of Conduct to which all employees will have to adhere. ■ Include non-discriminative practices in recruitment and trainings on social topics and integrate relevant accommodation measures for vulnerable groups ■ Extend these obligations to contractors and subcontractors along the supply chain through binding

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>the types of jobs that will be created by the project that are carried out by women as well.</p> <p>Considering the above, the level of risk before mitigation has therefore been assessed as medium.</p>	<p>contractual frameworks</p> <ul style="list-style-type: none"> ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plans. ■ Engage with authorities on improved gender impacts on the sector. ■ Train managers and workers on zero tolerance approaches to Gender-Based Violence and Harassment (GBVH). ■ Ensure Grievance Mechanism (GM) is equipped to handle sensitive issues on non-discrimination, capable of referring cases and provide safeguarding for any

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
					potential negative impact upon its use
Right of protection for the child	ICCPR 24	PR2 PS1, PS4, PS5	High	<p>While, the contextual conditions in Kazakhstan are not considered favourable for the rights of children, based on the documentation reviewed on management systems, The risk of child labour in project construction is considered low due to the well-regulated and planned approach in recruitment.</p> <p>However, the risk is still graded as high because the project may contribute child labour through its supply chain risks which involves using of raw materials and minerals associated with child labour. A more detail information is provided in supply chain risks. .</p>	<ul style="list-style-type: none"> ■ Integrate considerations for special protection of children, in particular the ban of child labour under the age of 18 into relevant management plans. ■ Prepare and adopt a Supply Chain Management Plan to include a process to ensure suppliers strictly adhere to the protection of children. ■ Adopt a zero-tolerance approach in the case that child labour situations are encountered among the workforce and along the supply chain;

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				The level of risk before mitigation has therefore been assessed as high.	<ul style="list-style-type: none"> ■ Ensure that special protection is provided for children in relation to Community Health, Safety and Security Management Plan, particularly related to traffic generated by the Project. ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plans.
Right to freedom of opinion, information and expression	ICCPR 19	PR2 PS1, PS2, PS4, PS5, PS7	Medium	The contextual freedom of expression and advocacy risks are assessed as high in Kazakhstan; therefore, appropriate measures need to be considered to guarantee the freedom of opinion, information and expression of all workers involved in the Project.	<ul style="list-style-type: none"> ■ Implement, maintain and periodically review the Internal and External Grievance Mechanism. ■ Include in the Stakeholder Engagement Plan a specific consultation with people crossing

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>However, based on the policies developed by the Client, it is envisaged that a dedicated Grievance Mechanism will be put in place in order to guarantee the freedom of expression to both workers and the local community and in order to track any potential negative impact that the Project could bring.</p> <p>Taking into account the national context in which the Project is and the measures that the Client has already in place, the risk has been assessed as medium.</p>	<p>and using the sites of the Project.</p> <ul style="list-style-type: none"> ■ Ensure that sufficient staff and resources are made available for the effective implementation of the Stakeholder Engagement Plan and the Grievance Mechanism.
Right to enjoy just and favourable conditions of work (including rest and leisure)	ICESCR 7	PR2 PS2	Medium	<p>The contextual labour related risks in Kazakhstan are assessed as medium to high.</p> <p>All workers directly and indirectly employed for the Project during construction</p>	<ul style="list-style-type: none"> ■ Prepare and implement Project specific Labour Management Plan with provision of employment contracts, access to training and

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>and operation require significant efforts and resources to ensure that labour rights are respected at all levels and along the entire supply chain.</p> <p>Total Energies Code of Conduct already envisages the necessity to ensure decent working conditions at all sites, included their high-risk suppliers. In particular, this includes a prohibition on forced labour and child labour, a commitment to non-discrimination and freedom of association, and a guarantee that any problems that arise can be reported to human resources staff.</p> <p>This will have to be included in all Project-specific labour related policies and management plans along the entire supply chain.</p>	<p>conditions for termination of employment.</p> <ul style="list-style-type: none"> ■ Prepare the plan in line with ILO conventions and in line with the regulations of Kazakhstan. ■ Develop a Workers Accommodation Management Plan to be aligned with the EBRD PR and IFC Guidance notes. ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plans.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>For what concerns specifically the suppliers, TE Code of Conduct envisages state to work in the interests of each party, in accordance with clear, fairly negotiated contract terms and more specifically the Code of Conduct requires all suppliers of goods and services to:</p> <ul style="list-style-type: none"> ▪ Comply with TE Fundamental Principles of Purchasing and ensure compliance by their own suppliers in turn. ▪ Take special care to comply with standards and procedures in the field of human rights, notably with regard to working conditions for their employees and those of their suppliers. ▪ Agree to be audited, to assess their compliance with these 	

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>principles for purposes of continuous improvement.</p> <p>Working conditions also have to do with the accommodation that will be provided to workers. Careful design and management of the accommodation facilities both during construction and operation therefore will be necessary to ensure working conditions in line with international standards.</p> <p>The level of risk before was high and has therefore been lowered based on the mitigation measures available. .</p>	
Right to social security, including social insurance	ICESCR 9	PR2 PS2	Medium	The contextual labour related risks in Kazakhstan are high.	<ul style="list-style-type: none"> ■ Prepare a Project specific Labour Management Plan with the obligation to honour

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>However, TotalEnergies has taken the commitment under its Human Rights Briefing paper 2018-2023 of providing all employees with a pension and health insurance plan, as well as other social security measures such as coverage at least equal to the median amount for the national industrial market in case of illness, participation in savings or supplementary retirement plan, protection of the family in the event of the death of the employee and a global mental health prevention program.</p> <p>In consideration of the above, the risk has been lowered to medium.</p>	<p>legally mandated social security, insurance payments, benefits on maternity, injury and so on.</p> <ul style="list-style-type: none"> ■ Extend these obligations to contractors and subcontractors along the supply chain. ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plan.
Right to freedom of association	ICCPR 21	PR2 PS2	Medium	Contextual risks are high for Kazakhstan in terms of	<ul style="list-style-type: none"> ■ Ensure that the Human Resource

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
<p>Right to participate in public life</p> <p>Right to freedom of assembly</p> <p>Right to form and join trade unions and the right to strike</p>	<p>ICCPR 22</p> <p>ICCPR 25</p> <p>ICESCR 8</p>			<p>civil liberties and political rights therefore, the risk has been assessed as medium.</p> <p>Freedom of association, assembly and collective bargaining is ensured in the commitments on human rights in the workplace in the Human Rights Briefing Paper 2018-2023 of TotalEnergies.</p> <p>Furthermore, on TotalEnergies' document "Fundamental Principles of Purchasing", it is specified that workers are allowed to choose whether to be member of a collective bargaining organization</p> <p>Also, contextual conditions in terms of workers' rights are considered lacking in Kazakhstan.</p>	<p>Policy guarantees workers' rights to freedom of association, public life and assembly.</p> <ul style="list-style-type: none"> ■ Develop and facilitate development of alternative platforms for workers representation in particular for workers groups for whom union membership is not an option ■ Ensure the obligations to contractors and subcontractors along the supply chain with audits. ■ Prepare and adopt Project specific Labour Management Plan, specifying the right of workers to participate in union activities.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>However, under its Code of Conduct, Total Energies ensures that with regard to political engagement, employees have the right to participate in political activities on their own right, if they specify clearly that they do not represent Total Energies and they notify their line management of any action with the potential to create a conflict of interest.</p> <p>Beside considering the measures that the Client has already in place, the national context remain concerning, therefore the the risk has been assessed as medium and appropriate mitigation measures need to be considered.</p>	<ul style="list-style-type: none"> ■ Extend these obligations to contractors and subcontractors along the supply chain.
Right to marry and form a family	ICCPR 23 ICESCR 10	PS2	Low	The working conditions, particularly during the construction phase, which	<ul style="list-style-type: none"> ■ Ensure that the Human Resource Policy and Labour Management

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>entail for workers long periods away from home and family living temporarily in the accommodation camp within the Project site (with construction expected to last from 30 to 36 months) can preclude the aspirations to marry and form a family. Appropriate rest periods to allow workers to periodically return to their hometown should be guaranteed to mitigate this risk.</p> <p>During the operational phase this risk is most likely to be mitigated because the Client expect to have a 15 days rotations for workers.</p> <p>The level of risk before mitigation has therefore been assessed as lower.</p>	<p>Plan include provisions for non-discrimination and adoption of working conditions for rest, leisure, and paid holidays in line with ILO conventions.</p> <ul style="list-style-type: none"> ■ Ensure that policies or practices (including working hours and eligibility for leave) do not hinder employees' adoption of a healthy work/life balance and ensure that policies do not discriminate against women on the grounds of marital or reproductive status. ■ Extend these obligations to contractors and subcontractors along the supply chain.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
Right not to be subjected to slavery or forced labour	ICCPR 8	PR2 PS2	Low	<p>The contextual conditions of Kazakhstan show that the risk of modern slavery is high in the country. Due to the large number of workers involved directly and indirectly in the Project during construction and their potential origin from different countries, the risk that workers are subject to forced labour may occur and must be carefully managed and monitored.</p> <p>The prohibition of all forms of forced labour and child labour is ensured in the commitments on human rights in the workplace in the Human Rights Briefing Paper 2018-2023 of Total Energies.</p> <p>Furthermore, on TotalEnergies' document "Fundamental Principles of Purchasing", Total Energies</p>	<ul style="list-style-type: none"> ■ Prepare and adopt a Labour Management Plan and a Human Resources Policy that explicitly prohibits the use of forced labour. ■ Ensure that the recruitment policy and procedures including those that are adopted by the contractors (suppliers, labour agents, employment agencies) aligned with ILO Fair Recruitment Principles. ■ Ensure the zero-tolerance approach towards forced labour including involuntary prison labour situations among the workforce and along the supply chain. ■ Identify workplace risks concerning forced labour (e.g. isolation)

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>requires all suppliers of goods and services to comply with the human rights principles listed and ensure compliance by their own suppliers in turn. In the document is specified the prohibition and prevention of forced</p> <p>Labour by ensuring that no worker is coerced to work against her/his will, the prohibition of confiscation of workers' identity documents and the obligation to ensure that no recruitment fees are charged to the worker.</p> <p>Taking into account the national context in which the Project is and the measures that the Client has already in place, the risk has been assessed as lower.</p>	<p>and develop mitigation measures for timely payments, limited mobility and forced and excessive overtime</p> <ul style="list-style-type: none"> ■ Ensure that the GM is equipped to address workers concerns on forced labour ■ Make information available on national referral channels and hotlines on human trafficking
Right not to be subjected to torture, cruel, inhuman	ICCPR 7	PS2, PS4	Low	The contextual conditions of Kazakhstan show that the	<ul style="list-style-type: none"> ■ Prepare of a Human Resource Policy and

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
and/or degrading treatment or punishment				<p>risk of inhuman or degrading punishments to workers could occur.</p> <p>The obligation to ensure decent working conditions is listed in the commitments on human rights in the workplace in the Human Rights Briefing Paper 2018-2023 of Total Energies.</p> <p>Careful development and implementation of labour related policies and management plans along the entire supply chain will be necessary to mitigate the risks on these aspects.</p> <p>The level of risk before mitigation has therefore been assessed as high.</p>	<p>Project specific Labour Management Plan ensuring the correct management of workers' misconducts.</p> <ul style="list-style-type: none"> ■ Ensure that sufficient staff and resources are trained and made available for the effective implementation of the plans. ■ Carry out internal audit to the contractor and subcontractor to monitor the correct implementation of the management plan.
Right to privacy	ICCPR 17	PR2	Low	Workers will be accommodated in accommodation camps through the construction	<ul style="list-style-type: none"> ■ Ensure that workers accommodation

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>phase for long periods of time, hence privacy conditions may not be optimal. The management of personal data of large number of workers can also lead to risks that they are not managed confidentially.</p> <p>However, TotalEnergies has included the obligation of respecting the privacy of its employees under its Code of Conduct and under the Human Rights Briefing paper 2018-2023, by ensuring to respect the privacy of its employees and the privacy of their personal data.</p> <p>The level of risk has therefore been assessed as lower.</p>	<p>management plan is correctly implemented.</p> <ul style="list-style-type: none"> ■ Minimise the use of monitoring, surveillance, and security measures of private individuals at the workplace. ■ Minimise asking workers their health status except when the status is directly relevant for work duties.
Rights to freedom of thought and religion	ICCPR 18	PR2 PS2	Lo	Based on the Client's policies on Accommodation Base, the accommodation	<ul style="list-style-type: none"> ■ Include in the Human Resource Policy the provision for non-

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>provided to workers during construction will include areas for workers to practice their religious beliefs. It is important that these areas will be foreseen for the different religious beliefs of the workers employed. Working conditions also have to be organized so to accommodate that workers can practice their specific religious beliefs freely.</p> <p>Indeed, Total Energies ensure under its Code of Conduct, Brochure on Fundamental Principles of Purchasing and Human Rights Briefing paper 2018-2023 to respect diversity of religious beliefs and the freedom of every employee to follow articles of religious faith as well guarantying freedom of speech and in countries where such rights are restricted, TE will</p>	<p>discrimination and protection of Workers Civil and Political Rights.</p> <ul style="list-style-type: none"> ■ Provide accommodation measures for the religious practices of workers according to their needs ■ Extend these obligations to contractors and subcontractors along the supply chain.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>ensure employees have the right to participate in a dialogue about their collective work situation.</p> <p>The level of risk has therefore been assessed as lower.</p>	
Right to health	ICESCR 12	PR4 PS3, PS4	High	<p>The Project site is located in a remote area with limited healthcare facilities. Mirny village has limited public health services that are already insufficient and under-equipped, as indicated in the baseline study. In case of serious emergencies or more complex medical needs, the nearest hospital to the site of the Project is in Moiynkum, at ca. 50km of distance.</p> <p>TE is already envisaging to equip the accommodation camp with an ambulance</p>	<ul style="list-style-type: none"> ■ Develop a robust Construction Occupational Health and Safety Management Plan, as well as other Environmental Management Plans deemed necessary in order to guarantee appropriate health assistance to workers on site. ■ Ensure the construction camp is equipped with a medical room with the continuous presence of

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>vehicle and potentially an evacuation helicopter available on call to evacuate patient with serious injuries.</p> <p>Even in consideration of the above, appropriate mitigation measures need to be implemented, therefore the level of risk has been assessed as high.</p>	<p>qualified nurses in contact with the closest hospitals.</p> <ul style="list-style-type: none"> ■ Ensure that a medical surveillance is periodically guaranteed to all the workers, especially contractors and subcontractors. ■ Make sure that OHS statistics for incident are correctly tracked and keep a log register to analyse the incident and put in place corrective actions, as needed. ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plan
Right to liberty and security (including freedom from	UDHR 3 and 9; ICCPR 9	PR2 PS2, PS4	Low	The management of security of working areas	<ul style="list-style-type: none"> ■ Develop and implement a Security

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
arbitrary arrest, detention or exile)				<p>and accommodation facilities in large scale projects as the current one often poses risks in terms of human rights of workers and local communities.</p> <p>TE already take part in the the Voluntary Principles on Security and Human Rights to ensure respect of human right in all its sites as well as with its suppliers.</p> <p>Based on the provisions already envisaged by the Client for security management within the project site, the level of risk has therefore been assessed as low.</p>	<p>Management Plan to ensure that security inside the construction camp is guaranteed.</p> <ul style="list-style-type: none"> ■ Considered that security personnel will be used on site, provisions should be made to ensure that excessive force is not used. Armed force is prohibited. ■ Perform dedicated trainings to all employees on the Voluntary Principles on Security and Human Rights.
Right to freedom of movement	ICCPR 12	PR2 PS2, PS5	Medium	The accommodation camp during construction will be located in a remote area and it is not known how workers will be allowed to travel to and from the camp. Measures need to taken in	<ul style="list-style-type: none"> ■ Include in the Labour Management Plan provisions minimizing restrictions of workers freedom of movement, including not withholding worker's

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>order to guarantee the freedom of movement of workers to and from the accommodation camp.</p> <p>Considering the contextual risk of the country on workers' rights, the level of risk before mitigation has therefore been assessed as medium.</p>	<p>travel documents, identity cards and wages or restrict movements related to workers accommodation camps. Bonded labour should be explicitly forbidden.</p> <ul style="list-style-type: none"> ■ Extend these obligations to contractors and subcontractors along the supply chain.
Rights of minorities and vulnerable groups (culture, religious practice, and language)	ICCPR 27	PR1, PR2, PR5, PR7, PR8	Low	<p>The rights of minorities and vulnerable groups have to be respected both among workers directly and indirectly involved in the Project and within local communities. Non-discrimination should be applied in the hiring process and in terms of working conditions within the Project</p>	<ul style="list-style-type: none"> ■ Ensure non-discriminative practices in recruitment and all labour related aspects through a Labour Management Plan. ■ Ensure that sufficient staff and resources are made available for the effective

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>workforce and along the supply chain.</p> <p>Total Energies already envisages under its Code of Conduct commitments in respecting the rights of local communities by identifying, preventing and mitigating any impact on their environment and way of life and remedying the situation as needed. TE systematically establish dialogue as early as possible with local communities also to support community development.</p> <p>In this sense, TE for each project is always committed to design and implement grievance procedures and corrective measures, particularly on behalf of vulnerable groups, including indigenous peoples.</p>	implementation of the plans.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				In this context, the level of risk has been assessed as low.	
Right to self-determination	ICESCR 1 + ICCPR 1	PS7	Medium	<p>Based on the outcomes of the baseline assessment, the land where the Project site lies is divided in Forest Fund land and Reserve Land. The largest portion of the Project area (particularly the northeastern part) lies on Forest fund land. There, land has been allocated to privates (Individual Entrepreneur (IE)). Most of the areas are for granite extraction, belonging to ORGSTROY LLP. Among the agricultural lands, Moyinkum AGRO LLP stands out with large lands allocated for agricultural purposes in the northwestern part of the requested site. Additionally, land belonging to the</p>	<ul style="list-style-type: none"> ■ Keep continuous communication and coordination with the parties who have interest on the land (ie. Individual Entrepreneurs and herders) during the Stakeholder Engagement Plan. ■ In order to assess the magnitude of the economic displacement implement socio-economic surveys in the area of interest, a census and an asset inventory. ■ Base on the outcomes of the above measure, develop and implement

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>individual Ospanbekov Tuleukhan, who has land for farming in the central western boundaries of the Project area, is notably significant. Furthermore, the Project area includes several small plots primarily owned by individuals for farming purposes. Seventeen landowners have been identified in the Project site.</p> <p>Furthermore, it was verified the presence of herders camps who use land seasonally for grazing purposes.</p> <p>Herders have no objection to the Project, nor to the possibility of relocating their livestock and grazing activities. However, the relocation of the herders will indeed cause an economic displacement that needs to be addressed with</p>	<p>a Livelihood Restoration Plan.</p> <ul style="list-style-type: none"> ■ To comply with the Kazakh law, develop and implement a Land Acquisition and Resettlement Plan (LARP) ■ Ensure that sufficient staff and resources are made available for the effective implementation of the plans.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>appropriate mitigation measures such as an LRP.</p> <p>PS5 is triggered in this sense and according to Kazakh law a Land Acquisition and Resettlement Plan (LARP) and a Livelihood Restoration Plan must be carried out.</p> <p>In this context, the level of risk before mitigation has been assessed as medium.</p>	
Right to access to effective remedies	UDHR 8	PR2	Low	Based on the policies developed by the Client, it is envisaged that a dedicated Grievance Mechanism will	<ul style="list-style-type: none"> Implement, maintain and periodically review a Grievance Mechanism that

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				be put in place in order to prevent, investigate, punish and redress any kind of abuse related to the Project. The level of risk before mitigation has therefore been assessed as low.	provides access to effective remedies for claimants.
Right to own property	UDHR 17	PR5	High	The Project is not expected to lead to physical displacement but it could lead to economic displacement based on the outcomes of the Stakeholder Engagement process. 17 landowners have been identified on the land that will be occupied by the WPP. These landowners perform economic activities on those land through seasonal herders who use the land for grazing activities. These herders install every year seasonal camps on these lands.	<ul style="list-style-type: none"> ■ Considering the expropriation of the lands, intended as loss of right to use the land for pasture and related economic displacement, the Client is recommended to open a discussion with the Government and perform dedicated social surveys to get more details about landowners and herders affected by the construction of the WPP. ■ Based on the results of the census and an asset inventory to

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>In this sense, expropriation of the lands to the landowners by the Government for public purposes and the loss of grazing land for economic activities are the main impacts expected to be caused by the project.</p> <p>The level of risk before mitigation has therefore been assessed as high.</p>	<p>prepare a Livelihood Restoration Plan implemented during the construction phase.</p> <ul style="list-style-type: none"> ■ To comply with the Kazakh law, develop and implement a Land Acquisition and Resettlement Plan (LARP). ■ Ensure that sufficient staff and resources are made available for the effective implementation of the LRP and LARP.
<p>Right to an adequate standard of living (Housing, Food, Water & Sanitation)</p> <p>Right to a clean, healthy and sustainable environment</p>	UDHR 25; ICESCR 11	PR5	Medium	<p>The construction phase may hinder on the nearest village resident's quality of life due to an increase in earthworks, noise and increased traffic and influx of people. Same issue may apply in the operation phase when an increase in</p>	<ul style="list-style-type: none"> ■ Identify and implement mitigation measures included in the Community Health, Safety and Security Plan and an Occupational Health and Safety Management Plan, as well as other

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>traffic and the influx of people will take place.</p> <p>Also, precipitation in Kazakhstan is low throughout the year, with average monthly levels of between 14 millimeters (mm) and 30 mm, although flooding can occur during spring due to increased rain and the thawing of winter snow (World bank data). As assessed in the Baseline Study, the Project area is unlikely to experience heavy rainfalls and communities have raised concerns about the lack of centralized water.</p> <p>The scarcity of water may also be exacerbated under the construction phase due high-water consumptions generating higher pressure on local hydric systems and this may have negative socio-economic</p>	<p>Environmental Management Plans deemed necessary.</p> <ul style="list-style-type: none"> ■ Ensure that the topic is broadly discussed in the Stakeholder engagement activities.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				consequences for nearby communities. Therefore, this risk has been assessed as medium.	
Human rights risks along the supply chain (Right to work)		PR1, PR2 PS2	Very High	<p>The contextual worker's rights are generally concerning in Kazakhstan, and the risk connected to the "right to work" for the supply chain is very high, as the Project will involve products at risk imported from China.</p> <p>Companies risk contributing to human rights violations through their mineral and wind turbine supply chains. Wind turbines require various materials, including cement, steel, iron, cobalt, fiberglass, polymers, aluminium, copper, zinc, and rare earth elements. Rare earth elements refer to 17 elements often found in the same mineral deposits,</p>	<ul style="list-style-type: none"> ■ Develop and Implement a Procurement and Human Rights Policy to ensure that the commitment to respect human rights and prevent modern slavery/forced labour practices are clear in the full supply chain process. ■ Prepare a Supply Chain Management Plan outlining the labour and working conditions requirements in compliance with PR1, PR2 and PS2. ■ Ensure that the plan is implemented by

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>including cerium, dysprosium, erbium, europium, gadolinium, holmium, lanthanum, lutetium, neodymium, praseodymium, promethium, samarium, scandium, terbium, thulium, ytterbium, and yttrium (IEA, 2022³).</p> <p>Several human rights risks are linked to the supply chain of these raw materials:</p> <ul style="list-style-type: none"> - Raw material extraction: The rising demand for critical minerals used in wind and solar projects intensifies existing human rights concerns in mining, such as child labour, violent incidents involving security personnel, attacks on human rights defenders, 	<p>contractors and subcontractors.</p> <ul style="list-style-type: none"> ■ Set up a qualification process for the selection of suppliers that guarantees suitable standards in terms of working conditions. ■ Aktas Energy LLP will need to ensure that wind turbine manufacturers who will supply materials for construction have publicly committed to OSCE or UNGPs Guidelines and that human rights commitments and principles are properly applied throughout the Project.

³ [Why is ESG so important to critical mineral supplies, and what can we do about it? – Analysis - IEA](#); [Mineral requirements for clean energy transitions – The Role of Critical Minerals in Clean Energy Transitions – Analysis - IEA](#)

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>and violations of Indigenous peoples' rights. These violations include interference with their rights to self-determination, free, prior, and informed consent, as well as access to land, resources, and cultural heritage (CCSI, 2022)⁴.</p> <p>- Production in conflict-affected or high-risk areas: Many mineral resources are extracted in regions classified as high-risk, where human rights abuses are more likely. These risks include severe labour exploitation, violent clashes with security forces, and potential funding of non-state armed groups.</p> <p>The suppliers identified for now, are two:</p>	<ul style="list-style-type: none"> ■ Aktas Energy LLP will be required to implement Due Diligences in the minerals/wind turbine supply chain following the OECD Due Diligence Guidance for Responsible Supply Chain, in order to identify and prevent or mitigate any risks of adverse impacts associated with mineral extraction conditions and supplier relationships operating in conflict-affected or high-risk areas. ■ Aktas Energy LLP is encouraged to incorporate into its existing policies on CSR or sustainability, the "Model Supply

^{4 4} [Respecting the human rights of communities - A Business guide for commercial wind and solar project deployment \(columbia.edu\)](#)

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>1) Envision Group, a green technology company based whose headquarters are based in China; the company has adopted internal policies a dedicated due diligence process for slavery and human trafficking. The company is not listed in the US company Sanction List, nor in the EU Entity Sanction list/ financial sanctions list;</p> <p>2) 2) SANY Group, a construction company based in China; the company is not listed in the US company Sanction List, nor in the EU</p>	<p>Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas" found in the OECD Guidance cited in the previous measure.</p> <ul style="list-style-type: none"> ■ Aktas Energy LLP should implement a Supply Chain Management Plan explaining how the supply chain will be selected and managed in the Project and ensure that the Plan is shared with contractors and sub-contractors ■ Enforce requirements on labour conditions through contractual agreements with contractors, subcontractors and suppliers.

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>Entity Sanction list/ financial sanctions list. However, according to a first screening a Report has been found on the Business & Human Rights Resource Center where SANY Group was identified as a company, among others, with significant risks of human rights violations. The Report "Human Rights Risks Behind Trains and Trams in Swedish Public Transport" was produced in March 2024 by Ethical Trading Initiative (ETI)</p>	<ul style="list-style-type: none"> ■ Develop and implement an extensive audit and review system for contractors, subcontractors and suppliers to ensure that the requirements in terms of labour conditions are effectively applied. ■ Aktas Energy LLP Procurement Department will have to develop and implement a dedicated audit and review system for the company SANY Group based on the data emerged from the first screening. ■ It is recommended that a Labour and Working Condition Assessment will be performed for both the two WTGs suppliers due to the

Human right	Covenant	EBRD PR and IFC PS	Risk level	Risk level justification	Recommended mitigation measures
				<p>Sweden⁵. At the time of writing this HRRRA, the company SANY Group hasn't formally responded to the allegation contained in the Report of ETI Sweden.</p> <p>In this context, based on the information available, the risk has been assessed before the application of mitigation measures as very high.</p>	extent of the supply chain for wind turbines generated by the Project.

⁵ [Report: High risk of forced labour in the production of trains and trams in China - ETI Sverige](#)

7.4 Conclusions

The Project entails human rights risks and can potentially cause adverse impacts on human rights. The aspects in Kazakhstan that show higher risks of human rights infringement have been identified as the following:

- Workers' rights;
- Supply chain risk; and
- Land use risk.

While risk-level allocations for the project-specific human rights risks in some instances follow the risk level of the contextual risk, in many cases the project-specific risks are assessed to be lower due to the specific characteristics of the Project as well as the mitigation measures to be developed or already developed by the client.

The project-specific risk level is assessed pre-mitigation and recommendations are provided on measures to be implemented to reduce the risks to sufficiently low or no risks depending on the risk level prior to mitigation.

Based on the outcomes of the screening performed, and on the risk identified, there is the need for a strong ESMS for both the construction and the operational phases. These plans will be partially developed by WSP in collaboration with the TE management team. As a result, we can expect the associated risks to be well contained and mitigated, provided that all recommended mitigation measures are communicated to and implemented by the contractors and subcontractors.

Transitional Plan

Furthermore, it is identified as a critical moment the handover from the end of the construction to the operation because of possible changes of responsibilities, new roles and organization. It is therefore recommended to develop a dedicated Transition Management Plan to be produced to make sure that human rights risks will be properly addressed under this plan.

The following main risks have been identified as most important for the Project.

Workers' rights violations

Kazakhstan is rated as a country with systematic violations of rights by the ITUC Global Rights Index. This rating means that working conditions in Kazakhstan are often below the standards considered adequate by international organisations and NGOs working on labour-related aspects. While Kazakhstan has ratified all ten ILO core conventions, flaws in Kazakhstan's legislation on workers' rights concerning collective bargaining, the right to strike or join unions and freedom of expression. The government has in place several labour laws protecting human rights; however they are often considered ineffective.

Since labour risks and risks related to civic space rights are high in Kazakhstan, the Project risk is generally assessed to be high before mitigation. Through the implementation of mitigation measures advised in the document, such risks can be reduced to acceptable levels. Mitigation measures include the preparation of Project-specific policies and Management Plans that demonstrate the commitment of the Project to work in accordance with international standards (IFC PS, EP IV, OECD Approaches).

Also, the impacts of the Project on labour related issues are linked to the significant number of workers involved in the construction, operation and decommissioning phase, which increase the risk of not managing adequately the risks that could occur at different levels within the workforce.

Total Energies already have in place policies to ensure workers' rights are protected and respected in all its workplaces, namely Total Energies Code of Conduct and Human Rights Briefing paper 2018-2023. Under these policies, Total Energies ensures respect of human rights in the workplace, in the relation with local communities

and under security activities; protection of personal health and safety of all employees; freedom of association and bargaining; respect for the privacy of all employees also with regards to political engagement and non-discrimination by origin, gender, age, disability, sexual orientation, gender identity or affiliation with a political or union organization or minority group.

Also, under their policy on Fundamental Principles of Purchasing, Total Energies requires to its suppliers to respect the same principles in order to collaborate with the Company.

However, In consideration of the above and with the application of the appropriate mitigation measures, the risk of workers' rights violation can be significantly lowered, however, Aktas Energy LLP, which will in turn adopt all Total Energies' policies and procedures relevant to this Project, is required to enforce and implement all of the policies related to this matter and to extend those to all contractors and suppliers.

Supply chain risks

The Project will include use of goods and equipment for the instalment of wind turbines, instalment of the OTHL the construction of new roads and enlargement/upgrade of the local road for reaching the site with vehicles, equipment and raw material. Some goods will be supplied from foreign countries, mostly China. The main suppliers have already been identified and based on the information publicly available it is known that these suppliers have policies and frameworks in place preventing the violation of human rights in their economic activities. Wind turbines require wide range of raw materials, including cement, steel, iron, cobalt, fiberglass, polymers, aluminium, copper, zinc, and rare earth elements. Many of these minerals are sourced from regions classified as weak-governance zones or conflict affected areas, where human rights violations such as child labour, forced labour and land related conflicts are prevalent. Furthermore, these supply chains are often characterised by low traceability, making it difficult for companies to conduct effective due diligence. Despite presence of management systems among existing suppliers, the complexity and opacity of upstream sourcing pose significant challenges. Given these risks, the initial screening results in with strong recommendation for heightened human rights due diligence in accordance with international standards. .It is expected that Aktas Energy LLP will implement appropriate mitigation measures when working with the its suppliers and extend also this practice to other suppliers when needed.

A lengthy and complex supply chain, like the one created by the Project, along with the contextual risks present in Kazakhstan, increases the likelihood of human rights violations occurring at some point. This situation also makes it more challenging for Aktas Energy LLP to ensure that all involved parties comply with the company's requirements.

As risks are assessed as medium-high, mitigation measures must be implemented to significantly reduce the risk level. This includes the preparation of a Supply Chain Management Plan outlining the mitigation measures to be applied such as the assessment of suppliers during the procurement phase and a periodic auditing system, to ensure that they guarantee working conditions in accordance with Kazakhstan labour regulation, EBRD PR2, IFC PS2 and ILO Conventions. Compliance with Project standards should be enforced through contractual agreements to guarantee that their contractors and subcontractors ensure fair working conditions.

Land use

As identified in the screening, the construction of the WPP will have a direct impact on landowners that are currently using the land for economic purposes, mainly grazing activities. Specifically, the construction of the WPP will generate an impact on the right of self-determination and the right to own the land of these affected people.

In this sense, Total Energies already adopt policies which envisage the respect of human rights of local communities, however appropriate mitigation measure will have to be implemented by Aktas Energy LLP. Specifically, in this context the IFC PS5 will be triggered, therefore it will be required to perform social surveys,

a census and an asset inventory of the Project Affected People (“PAP”) in order to develop and then implement a Livelihood Restoration Plan (“LRP”). Also, in order to comply with the national regulations, also a Land Acquisition and Resettlement Plan (“LARP”) will need to be developed and implemented.

Within the context of the identified risks, the client is currently in the process of establishing a grievance mechanism designed to address complaints from all types of stakeholders, which is regarded as a key cross-cutting mitigation measure. An effective grievance mechanism, informed by stakeholder inputs and sustained engagement, can serve as a critical tool for the early identification and prevention of potential conflicts—whether among community members or within the workforce. Such mechanisms can also play a pivotal role in detecting risks related to abuse, harassment, and forced labour, thereby enabling timely intervention. Beyond prevention, a well-designed grievance mechanism functions as a remedy provider, offering affected individuals a safe, accessible, and credible avenue to raise concerns and seek resolution. To be effective, the mechanism must be transparent, culturally appropriate, and equipped with safeguards to protect users from retaliation. These mechanisms should be underpinned by clear procedures and safeguards to ensure accessibility, confidentiality, and protection against retaliation for all users.

Actions for minimising and managing human rights risks

Action 1:

As already claimed, a robust environmental and social management system will be established to ensure that mitigation measures identified within the ESIA are systematically implemented and monitored. The following specific Management Plans and Policies are recommended to be developed and implemented to mitigate the main human rights risks generated by the Project:

- Human Resources Policy;
- Human Rights Policy;
- Code of Conduct;
- Labour Management Plan;
- Stakeholder Engagement Plan;
- Community Health, Safety and Security Management Plan;
- Occupational Health and Safety Management Plan;
- Supply Chain Management Plan;
- Livelihood Restoration Plan; and
- Livelihood Restoration Plan;

Specifically, the Project Human Resources Policy, Human Rights Policy and the Code of Conduct will have to include clear provisions for the protection and monitoring of working conditions, non-discrimination, protection and monitoring of GBVH conduct, prohibition of forced and child labour and avoidance of retrenchment. Such policies will have to be in place before the financial close of the Project.

In addition to developing a robust management system, it is key that the plans are effectively adopted and implemented throughout the entire construction and operation phases. It is therefore essential that sufficient and skilled staff is appointed for its implementation, with a clear organizational chart and clearly defined roles and responsibilities. The management system will have to include a comprehensive monitoring system to continually verify the performance of the Project in terms of human rights risks and to rapidly implement corrective actions in the case that non-compliances or new risks are identified. If necessary, third parties should be involved to ensure an impartial assessment of the Project’s performance in terms of human rights.

Provisions outlined in these policies must be extended to all contractors involved in the Project and, subsequently, they should cover all supply-chain workers. These requirements will be upheld through clear contractual obligations. Aktas is responsible for monitoring adherence to these obligations and will enforce the contractual agreement should any violations occur. Finally, working and labour conditions related issues should be managed through the development of Project-specific Environmental and Management System, a Labour Management Plan and a Supply-chain Management Plan.

Action 2:

Due to the size of the Project and the extent of the supply chain generated by the Project, strong control of contractors, subcontractors and suppliers, especially concerning the company SANY Group, will have to be ensured through a robust auditing and monitoring system. A Labour and Working Condition Assessment has been recommended to be performed on the two WTGs suppliers and at the time of writing this document, the assessment is ongoing. The outcomes of the assessment will define whether it will be feasible to use the identified providers as suppliers for the Mirny Project. All the considerations will be included in the Supply Management Plan.

Action 3:

A Stakeholder Engagement Plan, is expected to be implemented in order to add engagement activities with external stakeholders, including the groups that may be impacted by the Project.

APPENDIX A

Human rights definition and screening

The Universal Declaration of Human Rights (“UDHR”) and the two Covenants, the ICESCR and the ICCPR, form what is known as the International Bill of Human Rights.

The Table 3 lists human rights as defined by the Guide to Human Rights Impact Assessment and Management which was developed in collaboration with the International Business Leaders Forum (“IBLF”) and IFC in association with the UN Global Compact as a framework to be used by companies committed to assessing and managing the human rights risks and impacts (HRIAM, 2010).

The table also defines which of these human rights are considered to be impacted by the Project. Each human right’s risk is then analysed in the Section 7.3.2 and recommended mitigation measures are provided.

Table 3: Human rights Screening. Source: Guide to Human Rights Impact Assessment and Management (HRIAM), 2010.

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
Right to life	UDHR 3; ICCPR 6	<p>“The right to life entails the right not to be deprived of life arbitrarily or unlawfully, and the right to have one’s life protected.</p> <p>The right not to have one’s life taken away by arbitrary killing is a fundamental right and includes a duty on governments to investigate such killings and punish offenders.”</p>	NO
Right to liberty and security (including freedom from arbitrary arrest, detention or exile)	UDHR 3 and 9; ICCPR 9	<p>“The rights to liberty and security of person prohibit unlawful or arbitrary detention of any kind. ‘Arbitrary’ (or unreasonable) detention is prohibited even if authorised under a state’s domestic laws. This Article recognizes the right to security of people, whether in or out of detention.</p> <p>Security of the person encompasses protection from physical attacks, threats of physical attack, or other severe instances of harassment.”</p>	NO

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
Right not to be subjected to slavery, servitude or forced labour	UDHR 4; ICCPR 8; ILO No. 29; ILO No. 105	“Slavery occurs when one human being effectively owns another. The right to freedom from servitude covers other forms of dominance, egregious economic exploitation, and degradation of human beings, which might arise for example in the context of the trafficking of workers (including sex workers), serfdom and debt bondage. Given the extreme nature of these human rights abuses, the rights to freedom from slavery and servitude are subject to no restrictions or qualifications.”	YES
Right not to be subjected to torture, cruel, inhumane or degrading treatment or punishment	UNHR 5; ICCPR 7	“If companies’ staff members are subjected to severe harassment or dangerous working conditions that cause serious mental distress and anguish. If companies’ products are misused to commit acts of torture. If the actions of business partners with whom companies have a business relationship are oppressive. Such relationships might be joint commercial ventures or the engagement of State security forces to protect company installations. In addition to freedom from torture, cruel, inhuman and/or degrading treatment or punishment, this right also protects people from being subjected to medical or scientific experimentation without their consent. In particular, companies in the	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		pharmaceutical sector should be aware of this right."	
Right to equality before the law, equal protection of the law, non-discrimination	UDHR 7; ICCPR 26; ILO No. 111	"This right guarantees equality before the law, and the equal protection of the law without discrimination. Individuals should be protected from discrimination on different grounds including race, colour, sex, language, religion, political or other opinion, national or social origin, property, and birth or other status. The latter ground is open-ended and has been interpreted to include statuses such as health status (e.g. HIV/AIDS), disability, marital status, age and sexual orientation."	YES
Right to have access to effective remedies	UDHR 8; ICCPR 2	"This right, and in particular, Article 2 of the ICCPR contains the general obligations for a State to respect and ensure that all individuals within its territory, and subject to its jurisdiction, enjoy the rights recognised in the Convention without discrimination; it also underscores the right to provision of an effective remedy for victims."	YES
Right to a fair trial	UDHR 10; ICCPR 14	"The right to a fair trial and equality before the courts is required in both criminal and civil proceedings to ensure the proper administration of justice. The rights include the entitlement to a public hearing	NO

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		before an impartial court or tribunal."	
Right to privacy	UDHR 12; ICCPR 17	"This right protects people against arbitrary, unreasonable or unlawful interference with their privacy, family, home or correspondence, as well as attacks on their honour and reputation."	YES
Right to freedom of movement	UDHR 13; ICCPR 12	<p>"This right has four parts. It allows people who are lawfully in a country to move freely throughout the country, to choose where to live within the country, and to leave the country. These three parts of the right may be limited by restrictions on movement that are necessary to protect national security, public order, public health or morals, or the rights and freedoms of others. The right to freedom of movement also gives people the right not to be arbitrarily prevented from entering their own country.</p> <p>Bonded labour, in situations where a worker's passport or travel documents are withheld, breaches the right to freedom of movement"</p>	YES
Right to have a nationality	UDHR 15	It is rare that the activities of a company would have any direct or indirect impacts upon this right, though they may be complicit in the abuses of this right by others.	NO

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
Right to marry and form a family	UDHR 16; ICCPR 23; ICESCR 10	“The right to family life requires protection of the family by society and the State. The concept of a family varies throughout the world; each society’s own definition of a family is generally applied. This includes the rights of men and women of marriageable age to marry and start a family, and for marriage to be entered into freely and with full consent. This right is relevant to companies insofar as certain work practices (including working hours and eligibility for leave) may hinder or enhance the ability of people to adopt a healthy work/life balance and spend quality time with their families.”	YES
Right to own property	UDHR 17; ICESCR 15	“The right to property ensures that everyone is entitled to own property alone as well as in association with others.”	YES
Right to freedom of thought, conscience and religion	UDHR 18; ICCPR 18	“The right to freedom of thought, conscience, and religion encompasses a person’s freedom to choose, practise and observe his or her chosen religion or belief. The freedom also protects atheists and the right not to profess any religion or belief.”	YES
Right to freedom of opinion, information and expression	UDHR 19; ICCPR 19	“Article 19 protects the right of each person to hold opinions free from outside interference. This right cannot be restricted in any circumstances. Article 19 also protects the right to freedom of expression, which	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		is the right to seek, receive and impart ideas in whatever media or form. This right can be restricted by measures provided by law and necessary to protect the rights or reputations of others, or to protect national security, public order, public health or morals”	
Right to freedom of assembly	UDHR 20; ICCPR 21	“The right to assemble and gather together peacefully is protected by Article 21 of the ICCPR. Assembly in this context may refer to a gathering that takes place for a specific purpose, where there is public discussion, or where ideas are proclaimed. Freedom of assembly encompasses the right to demonstrate in groups, whether in stationary gatherings or marches.”	YES
Right to freedom of association	UDHR 20; ICCPR 22; ILO No. 87	“Article 22 of the ICCPR protects the right to form or join all types of association such as political parties, religious societies, sporting and other recreational clubs, non-governmental organisations and trade unions.”	YES
Right to social security, including social insurance	UDHR 22; ICESCR 9	“The right to social security encompasses the right to access and maintain benefits without discrimination. Governments are obliged to make available a system of social security. Such systems may involve contributory or	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		insurance-based schemes, which normally entail compulsory contributions from the beneficiary and the beneficiary's employer (and sometimes the State), as well as universal or targeted schemes funded out of the public purpose."	
Right to work	UDHR 23; ICESCR 6	<p>"The right to work recognises the right of everyone to the opportunity to make their living by work which they freely choose or accept. This implies that one should not be forced to engage in employment and that States develop a system designed to guarantee all workers access to employment. Workers should not be unfairly deprived of employment.</p> <p>Work as specified in Article 6 of the ICESCR must be 'decent work', that is work that respects a person's human rights including workers' rights regarding conditions of remuneration and work safety. The right to work includes the prohibition of arbitrary dismissal."</p>	YES
Right to enjoy just and favourable conditions of work (including rest and leisure)	UDHR 23 and 24; ICESCR 7	"The right to enjoy just and favourable working conditions has various components, which are all highly relevant to the actions of companies as they concern the treatment of employees"	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
Right to form trade unions and join trade unions, and the right to strike	UDHR 23; ICESCR 8; ILO No. 98	“Article 8 of the ICESCR concerns the right of everyone to form trade unions and to join the trade union of his or her choice, subject to the union’s own membership rules. This right may only be restricted by States in circumstances that are set down in law and are necessary to protect national security, public order, or the rights and freedoms of others.”	YES
Right to an adequate standard of living (Housing, Food, Water & Sanitation)	UDHR 25; ICESCR 11	“Article 11 of the ICESCR guarantees the right to an adequate standard of living including adequate food, clothing, housing and continuous improvement of living conditions. It has also been interpreted as including access to sufficient water and sanitation.”	YES
Right of protection for the child	UDHR 25; ICCPR 24; ILO No. 182	“Children are recognized by this right as being in need of special protection as required by their status as minors. The duty to protect a child attaches to his or her family, community and the State. A child has the right to be registered and given a name immediately after being born, and the right to acquire a nationality.”	YES
Right to health	UDHR 25; ICESCR 12	“This right recognizes the highest attainable standard of physical and mental health. States must take measures to prevent, treat and control diseases, reduce infant mortality and provide for the healthy development of	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		children, improve all aspects of industrial and environmental hygiene, and to create conditions that will ensure universal access to appropriate medical services and medical attention in the event of sickness.”	
Right to education	UDHR 26; ICESCR 13 and 14	“The aim of the right to education is “the full development of the human personality and sense of dignity”. Articles 13 and 14 of the ICESCR guarantee all children the right to free and compulsory primary education.”	YES
Right to participate in cultural life, benefit from scientific progress, material and moral rights of authors and inventors	UDHR 27; ICESCR 15	“Article 15 of the ICESCR guarantees the right to take part in the cultural life of society. It also guarantees the rights of all to enjoy the benefits of scientific progress. Its application is designed to ensure that everyone in society can enjoy technological advances, in particular disadvantaged groups. This right is of relevance to indigenous peoples as it extends to their rights to preserve, protect and develop indigenous and traditional knowledge systems and cultural expressions.”	NO
Right to self-determination	ICCPR 1, ICESCR 1	“This right allows peoples to determine their political status and their place in the international community. It includes the right of peoples to	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		<p>develop and progress in social, economic and cultural terms, to dispose of their land's natural resources and wealth, and not to be deprived of their own means of subsistence.</p> <p>The right to self-determination is concerned with freedom from domination by an alien power. It is a collective or group right held by 'peoples', often understood as peoples under colonial or comparable rule. The right of self-determination of indigenous peoples has also been recognised by the international community. As a right enjoyed by a group, it differs from most other human rights, which are framed as rights of the individual.</p> <p>A company's activities may impact negatively on the right if, for example, it is allowed to build a facility on land that has traditional significance to the peoples that inhabit the area"</p>	
Right of detained persons to humane treatment	ICCPR 10	"The right of detained persons to humane treatment provides special protection for detainees, a group that is highly vulnerable to human rights abuses."	NO
Rights of minorities	ICCPR 27	"This right recognizes the rights of members of ethnic, religious or linguistic minorities to enjoy their own culture, to practise their religion, and to speak their language.	YES

HUMAN RIGHTS	INTERNATIONAL HUMAN RIGHT INSTRUMENT	DEFINITION	IMPACTED (YES/NO)
		Indigenous peoples are included within the protection of Article 27 of the ICCPR. Their interests may also be protected under Article 1 (the right to self-determination) of both International Covenants (ICCPR and ICESCR). Article 27 also applies to migrants, including recently arrived migrants”	

The following Table lists the human rights defined by the Guide to HRIAM which are not explicitly referenced in the IFC Performance Standards due to their reliance on State action and the fact that they are unlikely to be directly impacted by business activities (HRIAM, 2010).

HUMAN RIGHTS / INTERNATIONAL HUMAN RIGHT INSTRUMENT		DEFINITION	IMPACTED (YES/NO)
Right to be free from retroactive criminal law	UDHR 11; ICCPR 15	"The right to freedom from retroactive criminal law prohibits the State from imposing criminal penalties for an act done that was not illegal at the time it was committed. It also prevents States from imposing heavier penalties for crimes than those that were prescribed at the time the crime was committed"	NO
Right not to be subjected to imprisonment for inability to fulfil a contract	ICCPR 11	"This right prohibits the imprisonment of people who are unable to pay a debt when the debt in question is a private obligation (rather than a public debt such as the obligation to pay tax) and arises when a person is incapable (as opposed to unwilling) of paying the debt or fulfilling the contract."	NO
Right of aliens due process when facing expulsion	ICCPR 13	"This right ensures that foreigners ('aliens') who are legally present in a country are not expelled from that country without due process in accordance with the law, including the right for an alien to be given the opportunity to present reasons why he or she should not be expelled and to have any expulsion decision reviewed."	NO
Right to participate in public life	UDHR 21; ICCPR 25	"The right to participate in public life concerns the ability of citizens to take part in the conduct of public affairs and to freely choose representatives to perform governmental functions on their behalf. This right also delineates specific aspects of the right to political participation such as the rights to vote and to be elected in free and fair elections, and a right of equal access to positions within the public service."	NO
Right to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred	UDHR 21; ICCPR 25	"The second part of Article 20 of the ICCPR is directed against 'hate speech', which is speech that vilifies people and incites hatred against them on the basis of their race, religion or nationality. This aspect of the right is of particular significance to media companies and also telecommunications companies that host blogs, forums, websites etc."	NO
Right to recognition of a person before the law	UDHR 6; ICCPR 16	"Article 16 guarantees that an individual be endowed with the capacity to be a person before the law. That is, a human being must be recognised as a person with 'legal personality'. It relates to a breach of legal personality in marriage relations (married women treated as property of the husbands) or children treated as property of parents"	NO
Right to seek asylum from prosecution in other countries	UDHR 14	"It is rare that the activities of a company would have any direct or indirect impacts upon this right, though they may be complicit in the abuses of this right by others"	NO

Right to a clean, healthy and sustainable environment	UN Human Rights Council resolution 48/13	“There is not a universally agreed definition of the right to a healthy environment, the right is generally understood to include substantive and procedural elements. The substantive elements include clean air; a safe and stable climate; access to safe water and adequate sanitation; healthy and sustainably produced food; non-toxic environments in which to live, work, study and play; and healthy biodiversity and ecosystems. The procedural elements include access to information, the right to participate in decision-making, and access to justice and effective remedies, including the secure exercise of these rights free from reprisals and retaliation”.	YES
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