



REPORT

Mirny (Kazakhstan) 1GW Wind Farm Project

ESIA Report Chapter 08 - Stakeholder Engagement Process

Submitted to:

Aktas Energy LLP

Aktas Energy

Submitted by:

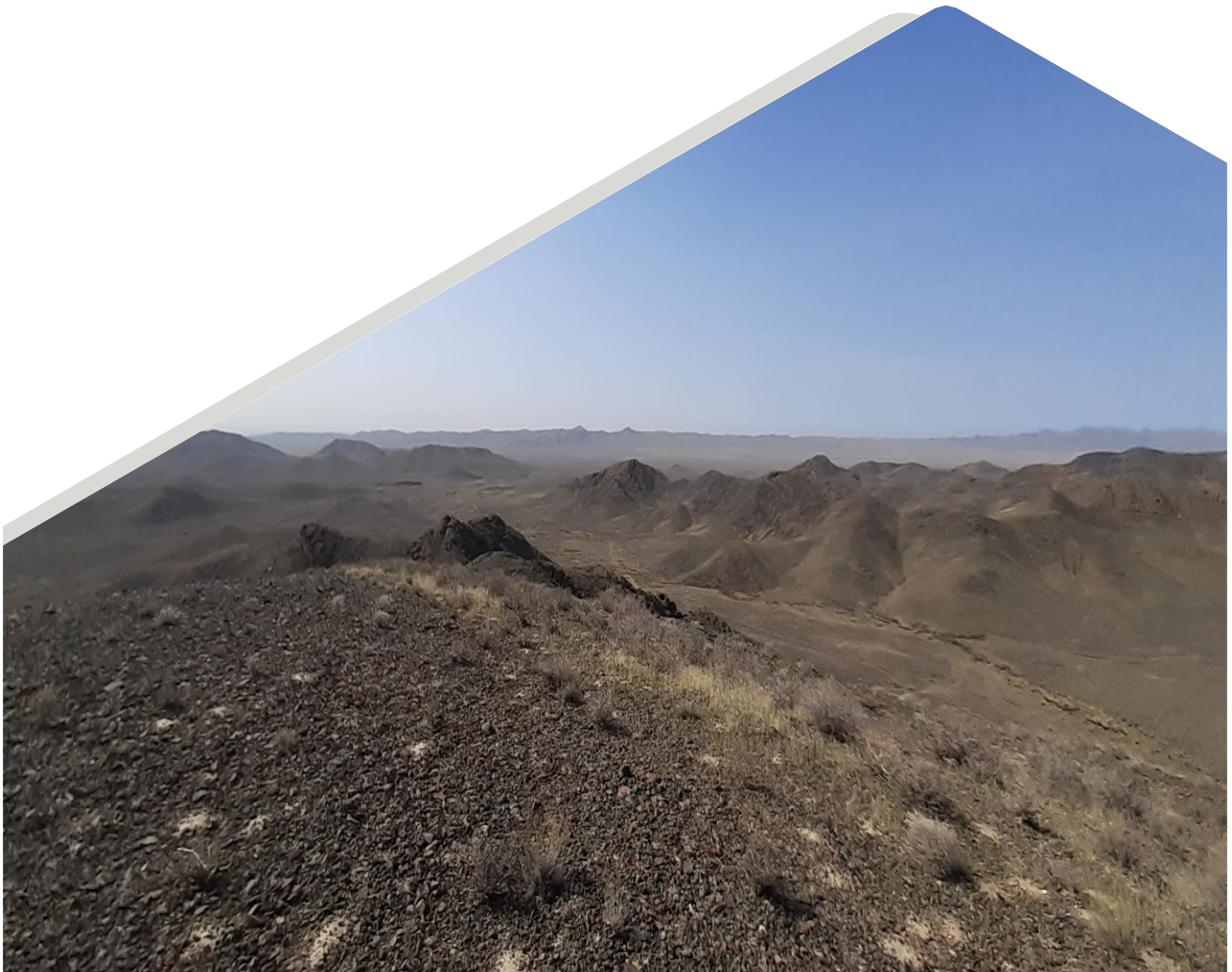
WSP Italy

Via Antonio Banfo 43, 10155 Torino, Italia

+39 011 23 44 211

24685792-004-R-Rev 03

December 2025



Distribution List

Aktas Energy

Wsp Italia

Table of Contents

8.0	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE	1
8.1	Introduction	1
8.2	Project stakeholders.....	1
8.3	Vulnerable groups	6
8.4	Previous engagement activities	7
8.4.1	Consultation undertaken during the Scoping phase	7
8.4.1.1	Main outcomes of the engagement activities	9
8.4.2	Consultation undertaken during the ESIA phase.....	9
8.4.2.1	Main outcomes of the engagement activities	13
8.5	Future engagement and disclosure activities.....	16
8.5.1	Draft ESIA consultation and disclosure engagement	16
8.5.2	Engagement for the land acquisition process (pre- construction)	16
8.5.3	Engagement during the construction phase	17
8.5.4	Engagement during the operation phase.....	17
8.6	Key Issues Identified to Date	17
8.7	Grievance Mechanism	38

TABLES

Table 1:	Stakeholder identification	2
Table 2:	Consultations undertaken during the scoping phase	7
Table 3:	Consultations undertaken during the ESIA phase.....	10
Table 4:	Outcomes of the consultations undertaken during the ESIA phase	13
Table 5:	Summary of the key issues identified during the engagement sessions (focus on ESIA comments and issues)	18

FIGURES

Figure 1:	Stakeholder categorisation.....	2
-----------	---------------------------------	---

8.0 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

8.1 Introduction

Stakeholder engagement involves communication to acknowledge their interests, address their concerns, and integrate them into the impact assessment process. This interaction allows for the exchange of information, helping to identify key stakeholder issues. These concerns are then incorporated into the assessment to ensure they are systematically addressed, mitigated, or managed. Early stakeholder engagement is crucial, as it enables the identification and resolution of potential issues before they escalate, ultimately supporting the project's success.

Stakeholder engagement may be achieved by:

- Providing relevant information to stakeholders in a timely manner;
- Receiving relevant information from stakeholders in a timely manner;
- Facilitating two-way discussions to identify and address stakeholder issues;
- Feeding stakeholder issues and priorities into program decision-making processes and demonstrating how stakeholder concerns have been addressed, including changes in Project decision making;
- Maintaining a mechanism for grievances to be raised and resolved in a timely manner;
- Involving affected stakeholders in monitoring the implementation of mitigation measures or other environmental and social programs; and
- Reporting and follow-through to the stakeholders.

This chapter present a summary of relevant engagement from the SEP (**ref. doc. 24685792-003-R-Rev.0**), prepared as part of the ESIA; it includes an overview of the stakeholder analysis, engagement and consultation activities undertaken to date, as well as providing the key issues raised around the Project.

8.2 Project stakeholders

The identification of stakeholders plays a pivotal role in facilitating meaningful engagement throughout the Project. This process involves a systematic approach to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by area.

Stakeholders have been identified and categorized as either directly or indirectly affected and classified not only by the level of impact but also by their interest in and influence over Project activities,

- **Category 1:** Directly affected stakeholders.
- **Category 2:** Indirectly affected stakeholders
- **Category 3:** Governmental and semi-governmental stakeholders at both national and local levels
- **Category 4:** Stakeholders with interest in communication and coordination

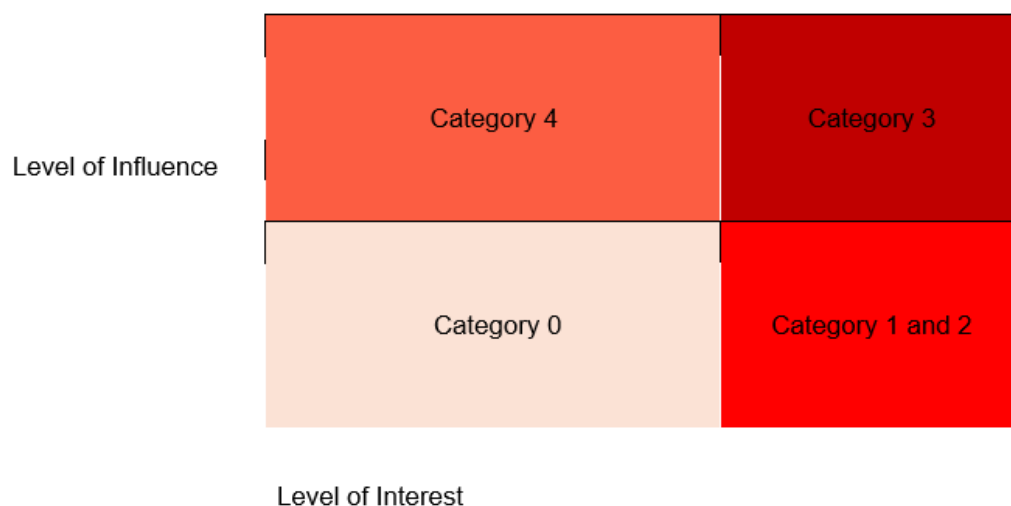


Figure 1: Stakeholder categorisation.

Stakeholders in Category 0 are stakeholders with low interest and low influence that are excluded from the categorization given the focused nature of this mapping exercise. Categories 1 and 2 are characterized by high interest but limited influence in the process. In contrast, Category 3 actors demonstrate both high interest and high influence, making them central to decision-making. Category 4 stakeholders, while generally showing low interest, may still exert significant influence through advocacy and lobbying power.

The list of key stakeholders is presented in Table 1. The list of stakeholder groups should be regularly reviewed and updated throughout the Project lifecycle and whenever new information is received.

Table 1: Stakeholder identification

Stakeholder category	Type	Engagement strategy
Category 3	Internal stakeholders	
	Total Energies	<ul style="list-style-type: none"> ■ Regular meetings with community stakeholders, local businesses and government officials, to discuss Project progress and address concerns. ■ Conducting open forums and workshops to provide updates on the ESIA process and gather feedback. ■ Monthly meetings with all contractors and subcontractors to discuss Project updates, progress, EHS monitoring and compliance.
	Aktas Energy LLP	
	National Wealth Fund “Samruk-Kazyna”/ Internal stakeholder	
	National Company “KazMunayGas”/ Internal stakeholder	
Category 3	Institutions - Government - National government Authorities ¹	
	<ul style="list-style-type: none"> ■ Ministry of National Economy of the Republic of Kazakhstan ■ Ministry of Transport of the Republic of Kazakhstan ■ Ministry of Agriculture of the Republic of Kazakhstan ■ Ministry of Education of the Republic of Kazakhstan ■ The Committee of forestry and wildlife of the Ministry of ecology, Geology and natural resources of the Republic of Kazakhstan ■ Ministry of Energy of the Republic of Kazakhstan ■ Ministry of Labor and Social protection of population of the Republic of Kazakhstan ■ Ministry of Industry and Construction of the Republic of Kazakhstan ■ Ministry of Water Resources and Irrigation of the Republic of Kazakhstan ■ Ministry of National Economy of the Republic of Kazakhstan ■ Ministry of Transport of the Republic of Kazakhstan ■ Ministry of Agriculture of the Republic of Kazakhstan 	<ul style="list-style-type: none"> ■ Official correspondence and meetings with National Government Official. ■ Providing reports to relevant ministries on Project updates
Category 3	Institutions - Government - Regional Level (Akimats)	
	<ul style="list-style-type: none"> ■ Akimat of Jambyl Region, including all departments representatives 	Official correspondence and face-to-face meetings with Regional Government Official.
Category 3	Institutions - Government - District level	
	<ul style="list-style-type: none"> ■ Akimat of Moiynkum District ■ Maslikhat of Moiynkum District 	Official correspondence and face-to-face meetings with District Government Official.
Category 3	Institutions - Government - Local level (rural district)	
	<ul style="list-style-type: none"> ■ Khantau Rural District Representative 	Official correspondence and face-to-face meetings with rural district Government Official.

¹ Stakeholders identified through the Official Governmental website of the Republic of Kazakhstan: [Akimat of Jambyl Region \(www.gov.kz\)](http://www.gov.kz)

	<ul style="list-style-type: none"> ■ Kiyakty Akimat 	
Category 3	Institutions - Government - Local level	
	<ul style="list-style-type: none"> ■ Representative/ Akim of Mirny Village ■ Representative/ Akim of Ulken Village ■ Representative / Akim of Shyganak Village (near Ulken Kamkaly lake) ■ Representative / Akim of Kenes Village ■ Environmental association OkhotZooProm 	<p>Official correspondence and face-to-face meetings with akims or village representatives.</p> <p>One to one meetings</p>
Category 4	Public companies/entities	
	<p>Mirny Village:</p> <ul style="list-style-type: none"> ■ Community hall Mirny Representatives ■ Post Office Mirny representatives ■ School of Mirny representatives ■ Medical centre Mirny representatives <p>Kiyakty Village:</p> <ul style="list-style-type: none"> ■ Railway station representatives in Kiyakty ■ Social (Health or educational) infrastructures in Kiyakty ■ Village elders 	<p>Official correspondence and meetings.</p> <p>Official boards.</p> <p>Akimat's What's App chat.</p>
Category 4	Contractors and subcontractors	
	Contractors and subcontractors	<p>Contractor Control and Monitoring of contractor performance and contractual E&S requirements by Aktas Energy LLP</p> <p>Performance and reporting by contractors</p> <p>Bulletin updates (via email, SMS & notice boards) on Project developments and Worker Grievance Procedure.</p>
Category 4	Suppliers	
	Suppliers	Risk screening, adherence with Aktas Energy LLP's Code of Conduct for suppliers. Site visits and due diligence prior to selection of supplier, prior to construction and as needed throughout construction period.
Category 1	Local communities	
	Land users (formal and informal, herders)/landowners/ business owners	<p>Face-to-face meetings and focus groups with individuals and communities to ensure that local communities concerns are understood (e.g., pre- construction announcements and meetings).</p> <p>A Land acquisition and Resettlement Plan according to the national legislation and Livelihood Restoration Plan must be carried out. A socio-economic survey, then a census and eventually an asset inventory must be carried out with each land user (herders) and landowners identified</p>

		<p>during the drafting of the ESIA to talk about compensation and livelihood restoration according to Kazakh law.</p> <p>Disclosure on Livelihood Restoration Plan and consultations with affected formal landowners / users (herders) affected by livelihood disruption.</p> <p>Frequent interactions with CLOs as required throughout construction and operation to resolve grievances raised via the GRM.</p>
	<p>Residents, in the following villages/towns within the Project area of influence:</p> <ul style="list-style-type: none"> ■ Mirny community ■ Kiyakty community ■ Shyganak community ■ Sholpan community ■ Ulken community ■ Kenes community ■ Khantau community ■ Qatari group 	<p>Sharing information about Project such as NTS, ESIA, SEP, etc.; Communication material and engagement will be carried out in the national language and the language of first minority ethnic group.</p> <p>Information boards in affected settlements in akimats and in local shops;</p> <p>Project website updates.</p> <p>Radio newspaper, TV and other media such as communities' social media pages;</p> <p>Public consultations;</p> <p>Focus group discussions and key informant interviews with vulnerable groups;</p>
	Children and young people	Liaise with local educational institutions and/or universities on graduate employment opportunities or capacity building programs
	<p>Women/ women-headed households</p> <p>Single parents households/ orphan children</p>	Women focus groups and consultations
	People with disabilities and/or households led by person with physical/mental disabilities (including chronic illness)	<p>Inclusive and flexible engagement methods including accessible activity materials such as²:</p> <ul style="list-style-type: none"> ■ Audio and video with synchronised captions, transcripts and signposting ■ Forms and surveys including audio, video, drawn or handwritten responses ■ Images or diagrams with clear and accessible content with descriptions and alternative text ■ In person and remote accessible presentations
	Elderly people	
Category 2	Workforce	
	Construction workers on site	<p>Internal HR and recruitment procedures.</p> <p>Training on social and environmental responsibilities.</p> <p>Worker's grievance mechanisms.</p>
Category 2	Civil Society Organisations - Non Governmental Organisation	

² [Good Practice Guidelines for Engaging with People with Disability](#)

	<p>Local NGOs (women's association, environmental associations, elderly associations, youth associations etc)</p> <ul style="list-style-type: none"> ■ Jambyl Business Women's Association ■ Zhandanu -Rights and Opportunities for the Disabled ■ Nakty Komek ■ Youth organization Ak Zhelken ■ Youth organization Zhangyru Zholy ■ Youth League ■ Republican Youth Movement ■ Assembly of the People of Kazakhstan in the Jambyl Region ■ Environmental association Taza Kazakhstan <p>Specific NGOs will be added throughout the life of the Project.</p>	Official correspondence and meetings.
Category 4	Academic and research institutions	
	<ul style="list-style-type: none"> ■ Association of Kazakhstan for the conservation of biodiversity (ACBK) 	Official correspondence and meetings.
Category 4	Media	
	<ul style="list-style-type: none"> ■ Local TV ■ Local media ■ Local influential bloggers, owning news channels on telegram and Instagram 	<ul style="list-style-type: none"> ■ Sharing information about the Project's progress on Project website
Category 3 – due to high influence on Project's decision-making process	International Finance Institutions/ Lenders	
	European Bank for Reconstruction and development	<p>Periodic E&S reports, including grievances and accidents/incidents</p> <p>Periodic e-mails communication on Project updates and occasional face to face meetings</p>

8.3 Vulnerable groups

Vulnerable groups are defined as those who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by Project impacts than others. They may be limited in their ability to claim or take advantage of assistance provided by the Project and related development benefits (IFC, 2002, p. xi).

The following vulnerable groups have been identified throughout field observations, interviews and secondary data sources.

- Land users (herders): nomadic people or herders may have specific resource or land- use dependence and they could be underrepresented in decision making processes. Site visit observations and discussions conducted by WSP in July 2024 suggest that certain communities within the Project site may rely on grazing areas as a vital component of their livelihoods. Any disruption to these areas could significantly impact their way of life, posing challenges in securing alternative livelihoods or adapting to new grazing routes;
- Landowners: could be disadvantaged with respect to compensation for any impacts due to land acquisition or change in land use;
- Isolated rural communities: most of the settlements around the Project site have experienced depopulation in recent decades. This includes communities in Khantau, Kiyakty, Mirny and the residential area in Sholpan. These areas are characterized by limitations in livelihood and infrastructure access and water scarcity. These communities may suffer disproportionate impacts from any disruption to access routes or livelihoods;
- Elderly: members of households who may have restricted mobility and more sensitive to health- related impacts. Participating in face-to-face consultations, and the physical move itself may be more challenging for this group. This group may be less able to adapt to economic and physical displacement;
- Persons with disabilities (including mental, chronic, and/or terminal physical illnesses): people with disabilities, as well as family members with caregiving responsibilities, may face heightened challenges and impacts due to the implementation of the Project. If they are required to relocate or experience a loss of economic livelihood, their vulnerability to Project-related impacts may increase, particularly in terms of their health and overall well-being. Given their sensitive physical and socio-economic status, these individuals may require additional support. Furthermore, households caring for disabled family members are statistically more likely to experience poverty, further exacerbating their susceptibility to adverse effects;
- Women: women may have reduced access to resources and are more at risk of sexual harassment and gender-based violence. Therefore, project impacts may affect women more. It was estimated in 2023 that 16.5% of women in Kazakhstan aged 18-75 have experienced intimate partner violence in their lifetime.³ Furthermore domestic responsibilities fall on women, who dedicate 19% of their day to unpaid domestic labor. This disparity could hinder women's participation in engagement activities;
- Low-income Households: Households depending on social aid or struggling to afford food often face greater financial hardship. Limited economic resources make low income households more vulnerable to external shocks and environmental changes, which can affect their ability to adjust to resettlement. In 2023, an estimated 5.1% of Kazakhstan's population lived below the national poverty line. In the Jambyl region, poverty rate was higher than the national average, at 5,8%. However, rural areas experienced higher poverty levels, reaching 7.5%; and

³ [SDG Report WEB](#)

- **Youth:** official statistics show a trend of young people leaving rural areas in the Aol of the Project. Individuals without work experience, qualifications, or relevant skills may struggle to secure employment opportunities. Moreover, those who lacked a stable livelihood before resettlement began might not be included in livelihood restoration programs.
- **Migrant Population including Migrant Workers:** Given the labor force dynamics in the project region and its proximity to international borders, the construction phase may attract migrant workers from neighboring countries. Migrant workers are frequently regarded as vulnerable due to limited access to labor protections and language-related challenges. Accordingly, targeted measures should be implemented to ensure their effective participation in stakeholder engagement processes, including mechanisms for collecting and responding to their feedback.
- **Other Vulnerable Groups with Limited Access to Engagement:** Additional groups that may face barriers to participating in the engagement process include ethnic minorities, individuals with low literacy levels, migrants, and non-native residents. Various factors—such as language barriers, limited literacy, and cultural constraints—may heighten these groups' vulnerability both in terms of experiencing project-related impacts and accessing project information and grievance mechanisms. Tailored outreach and inclusive communication strategies are essential to ensure equitable access and meaningful participation.

8.4 Previous engagement activities

8.4.1 Consultation undertaken during the Scoping phase

Total Energies carried out two consultation meetings during the development of the scoping between January and November 2023. The company conducted preliminary engagement activities with institutional stakeholders and local communities' representatives in Astana and Mirny. These activities aimed at informing the stakeholders about the Project, obtaining information on the sites and its surroundings, identifying potential impacts and collecting the expectations and concerns of the stakeholders regarding the Project.

The consultation objectives were:

- Present the WPP Project, its location, its components;
- Present the objectives of the screening mission;
- Collect information; and
- Collect stakeholders' views, expectations and concerns about the Project.

The Table 2 below outlines the two engagement activities for the scoping phase.

Table 2: Consultations undertaken during the scoping phase

No.	Date	Location	Type of stakeholder	Stakeholder name
1	11/01/2023	Astana	Government - National government Authorities ⁴	Representatives from the Committee of forestry and wildlife of the Ministry of ecology, Geology and

⁴ Stakeholders identified through the Official Governmental website of the Republic of Kazakhstan: [Akimat of Jambyl Region \(www.gov.kz\)](http://www.gov.kz)

No.	Date	Location	Type of stakeholder	Stakeholder name
				natural resources of the Republic of Kazakhstan
				Representatives from Total Energies.
2	12/10/2023	Mirny Village, Jambyl Region	Institutions – Government - Regional Level (Akimats)	S***** A*****manov (Mirny Village Akim)
			Institutions – Government – Local level	K*****arlygash S*****agyndykova (Messenger and cleaning lady at akimat)
			Public companies/entities	O*****r I***. Chef specialist akimat;
				A***** A****. Head of Post in Mirny Village;
				A*** A** Z***. Head of youth policy department;
				S***** K*****, First aid station nurse;
				A***** S***.O***. Jambyl Region, Head of Environmental Programs Department;
				Dr. Rhys Bullman WSP;
				Barbara Scorza WSP;
				Federico Breda WSP;
				Tetiana Voitovych E&S Coordinator, Total Energies;
				M***** A*** TREN KZ;
				M*** A***** TREN KZ;
				D***** H**** TREN KZ

8.4.1.1 Main outcomes of the engagement activities

The discussions in the meetings listed in the table above focused on the potential reduction of the Zhusandaly Reserve Zone and changes in the forestry territory due to the Project. The Ministry recommended a biodiversity study and impact assessment for the wind energy plant. The E&S coordinator of Total Energies provided updates on the Mirny Project, emphasizing environmental and social aspects, biodiversity studies, and job opportunities for locals. The village head highlighted socio-economic issues, while the Jambyl Region's Environmental Programs Department confirmed the need for a standalone environmental permit (OVOS). One participant raised concerns about the lack of centralized water and poor connectivity. TREN KZ representatives provided positive feedback on the wind farm, exchanged contacts, and planned further engagement.

8.4.2 Consultation undertaken during the ESIA phase

A series of consultations were carried out by Total Energies and Green Operating during the development of the ESIA, between February 2024 and January 2025. These included seventeen meetings in total, including official and informal meetings, surveys and official and informal interviews.

The meetings were held in cooperation between Green Operating and Total Energies; the meeting on July 9 was held by Yuliya Allakhverdiyeva - Green Operating (WSP subcontractor), Marat Amirseitov and Abzal Mukhtarbekov from TE. The meetings on July 10, 2024, were conducted by Abat Amankul and Yuliya Allakhverdiyeva from Green Operating (a WSP subcontractor), with support from TE's Marat Amirseitov, Kairat Seitkaliyev, and Abzal Mukhtarbekov.

The primary purpose of this phase was to gather primary data for the socio-economic baseline, it also involved engagement with stakeholders and provided stakeholders an opportunity to provide feedback or ask any questions regarding the proposed Project. Stakeholder engagement during this phase included meetings with key government stakeholders at National and Local level, community-based organisations and local community members.

Engagement objectives during baseline data gathering were:

- To understand the existing environmental and socio-economic context of the Project Aol;
- To inform impact predictions (positive and negative) and assessments of the ability of receptors and stakeholders to benefit from, adapt to and accept change;
- To further identify stakeholders who are potentially sensitive/ vulnerable to the proposed Project or able to support the implementation of information disclosure and mitigation measures; and
- To receive stakeholder feedback in order to differentiate between stakeholders perceived as impacted and actual impacts;

Communities engaged were selected based on the following characteristics:

- Proximity of the community to the Project footprint;
- Communities residing in the Project Aol who own land or enjoy user rights on the land in-and-around the Project footprint; and
- Level of vulnerability.

The Table 3 below outlines the engagement activities for the ESIA phase and National EIA disclosure process.

Table 3: Consultations undertaken and planned for the ESIA phase and National EIA

No.	Date	Location	Type of stakeholder	Stakeholder name
1	10/02/2024	Astana, Kazakhstan	Institutions – Government – National government Authorities	A**** V**** K**, Forestry and Wildlife Committee, Ministry of Ecology and Natural Resources of Kazakhstan.
				Ilya Vladimirovich Chernodarov, TE.
				Marat Amirseitov, TE.
2	08/07/2024	Shyganak Village	Local communities	Yuliya Allakhverdiyeva – Green Operating Marat Amirseitov and Abzal Mukhtarbekov from TE
				Roadside car service shop owner
				Roadside café owner
3	09/07/2024	Shyganak Village	Institutions – Government – Local level	Village Akim Shyganak
4	09/07/2024	Kiyakty Village	Local communities	Residents in Kiyakty and a local activist
5	09/07/2024	Mirny Village	Institutions – Government – Local level Local communities	20 individuals, including akimat staff, local activists, business owners, retirees, and unemployed residents:
6	09/07/2024	Mirny Village	Local communities	50 including the hotel owner, shop owner, local ambulance driver, and numerous residents.
7	09/07/2024	Project Site	Local communities	Ten herders using the land and landowners
8	09/07/2024	Project Site	Institutions – Government – District level	Chief Inspector of the Moiynkum district
			Civil Society Organisations- Non-	Inspection team from OkhotZooProm

No.	Date	Location	Type of stakeholder	Stakeholder name
			Governmental Organisation	
9	10/07/2024	Khantau Village	Institutions – Government – Local level (rural district) Local communities	Local akimat employees
				Khantau Village residents
10	10/07/2024	Moynkum Village (administrative center of Moynkum district in Moynkum village)	Institutions – Government – District level	Interim akim Mr. S*** T****
				Head of the land management unit Mr. Y*** K****
				The business development specialist of the Akimat
11	10/07/2024	Shu Substation	Internal stakeholder	Mr. C*****z J***** (Chief Engineer at the Shu Substation)
12	10/07/2024	Kenes Village	Local communities Public companies/entities	Kenes village residents
				Local medical unit workers
13	10/07/2024	Ulken Village YUKGRES substation	Local communities	Ulken village residents
14	11/07/2024	Kanshengel Village	Institutions Government Local Level Civil Society Organisations- Non Governmental Organisation	S*** O***, OkhotZooProm;
				A*** A***, OkhotZooProm
				B*** D*****, OkhotZooProm
				Ilya Chernodarov, TE;
				Abzal Mukhtarbekov, TE;
				Marat Amirseitov, TE;
				Kairat Seitzkaliyev, TE.
				S*** S***, ACBK
				A*** K***, ACBK
				Abat Amankul, Green Operating LLP

No.	Date	Location	Type of stakeholder	Stakeholder name
				Yuliya Allakhverdiyeva, Green Operating LLP
15	30/08/2024	Almaty, Kazakhstan.	Institutions Government Local Level Civil Society Organisations- Non-Governmental Organisation	S**** N**** O****, RSE "PO "Okhotzooptom";
				Abzal Mukhtarbekov, TE;
				Marat Amirseitov, TE;
				Guillaume Capdevier TE;
				Veronica Charlot, TE;
				Tetiana Voitovych TE;
				S**** L**** S****, ACBK
				Rhys Bullman, WSP
16	02.10.2024	Almaty, Kazakhstan	Institutions – Government – National government Authorities	A**** K*** V*****, Committee of Forestry and Wildlife of the Ministry of Ecology, Geology and Natural Resources of the Republic of Kazakhstan
				Ilya Chernodarov, TE;
				Marat Amerseitov, TE;
17	09/01/2025	Almaty, Kazakhstan	Institutions – Government – National government Authorities Civil Society Organisations- Non-Governmental Organisation	S*** O****, Deputy General Director of Production Association "Okhotzooptom" of the Committee of Forestry and Wildlife of the Ministry of Ecology and Natural Resources of the Republic of Kazakhstan
				S**** S****, Ph. D. in Biology (PhD), Deputy Executive Director for Science, Director of the Centre for Applied Biology, ACBK
				Aizhan KAMYSBAYEVA Environmental and social manager, TE
				Marat AMIRSEITOV Development Manager, TE

No.	Date	Location	Type of stakeholder	Stakeholder name
18	October 2025	Jambly. Region Moynhikum, Shu District	CSO Institutions- Government Local-Regional	List of all participants available at the EPA Portal
19	December 2025	Almaty, Kazakhstan	Institutions - Government - National government Authorities	OkhotZooProm representatives
20	18/12/2025	Almaty, Kazakhstan	Civil Organisations- Governmental Organisation	Bird Life
21	2026	Almaty, Kazakhstan	Civil Organisations- Governmental Organisation	Institute of Botany of Kazakhstan and relevant scientific or other institutions working on Critical Habitats (CH) and Priority Biodiversity Species (PBF)

8.4.2.1 Main outcomes of the engagement activities

Table 4: Outcomes of the consultations undertaken during the ESIA phase

No	Stakeholders	Reviews Collected			Reasons
		Favourable	Favourable subject to -	Refusal	
1. ⁵	A***** V**** K**, Forestry and Wildlife Committee, Ministry of Ecology and Natural Resources of Kazakhstan. OkhotZooProm		✓		<ul style="list-style-type: none"> The Project site is in between the Zhusandaly State Reserve Zone in the south and the Andasay State Nature Sanctuary in the west and the stakeholders underlined the importance of biodiversity preservation. Protected species like argali, goitered gazelles, and golden eagles are present on the site, and they may be impacted by the noise and wind turbine flickering. A collaboration between Okhotzooprom and ACBK has been established and

⁵ The opinion of this stakeholder has been reported only once, even though multiple meetings took place (No. 1, No. 14-17 in Table 3). This is because the meetings consistently involved the same stakeholder and focused on the same topic. As a result, there was no new or differing input to report across these engagements, and a single summary sufficiently captures the stakeholder's perspective.

No	Stakeholders	Reviews Collected			Reasons
		Favourable	Favourable subject to -	Refusal	
					<p>focuses on research and developing compensation measures such as habitat restoration, monitoring, and protecting wildlife migration routes. Measures include:</p> <ul style="list-style-type: none"> - restoring habitats for argali after construction, including GPS collars for tracking argali's migration has been proposed to be postponed until August-September 2025 or use observation posts for monitoring migration. - measures to prevent bird collisions with turbines, including strategic turbine placement away from migration routes and automatic braking systems. <ul style="list-style-type: none"> ■ Importance of development of an Environmental Action Plan which should focus on animal migration monitoring, habitat compensation, and budget allocation for these efforts. ■ Requested clarification on the position of Qatari representatives, who conduct hunting activities in the area. ■ Project land overlaps with forest fund lands. Collaboration with the forest owner to clarify the land's status and avoid unnecessary reclassification.
2.	Local communities in Shyganak Village Village Akim Shyganak	✓			<ul style="list-style-type: none"> ■ Job opportunities creation
3.	Local communities in Kiyakty Village		✓		<ul style="list-style-type: none"> ■ A formal meeting was requested by a local activist with the village elders to discuss the project in detail. ■ Local residents are generally optimistic about the Project, though some are concerned about potential health impacts. The local activist of the village reported that the community would

No	Stakeholders	Reviews Collected			Reasons
		Favourable	Favourable subject to -	Refusal	
					<p>support the windfarm as long as it posed no harm</p> <ul style="list-style-type: none"> The main concern raised was water scarcity and clean supply, highlighting a potential intervention and support from the Project
4.	Mirny village Institutions – Government – Local level Local communities	✓			<ul style="list-style-type: none"> Job creation and business opportunities Main concerns were highlighted such as inadequate mobile coverage and insufficient supply of drinking water
5.	Project site - Herders	✓			<ul style="list-style-type: none"> Herders expressed a favourable position toward the Project
6.	Project site - landowners		✓		<ul style="list-style-type: none"> The landowners are based in Almaty and indicated that they do not have concerns about the Project, provided that the same land conditions, especially regarding the restoration of water wells, are maintained following the Project's implementation
7.	Project site - landowner		✓		<ul style="list-style-type: none"> One landowner who was on-site confirmed that he has no objections to the Project and would relocate to another area if necessary
6.	Chief Inspector of the Moynkum district		✓		<ul style="list-style-type: none"> No objections to the Project, provided there are no severe environmental impacts and that the Project will create new job opportunities in the region
7.	Khantau residents and local akimat employees		✓		<ul style="list-style-type: none"> Had no previous information about the project Resident were generally positive about potential economic benefits and job opportunities that the Project might bring
8.	Akimat Moynkum district	✓			<ul style="list-style-type: none"> Positive outlook on the Project

No	Stakeholders	Reviews Collected			Reasons
		Favourable	Favourable subject to -	Refusal	
9.	Chief Engineer Mr. Chingiz Jumabekov – Shu Substation	✓			<ul style="list-style-type: none"> The Project is perceived as a good initiative that will contribute to the development of the local infrastructure and community
10.	Kenes village residents and local medical unit workers		✓		<ul style="list-style-type: none"> Had no previous information about the project and they were largely unaware of the existing OHTL system nearby
11.	Ulken village residents near the YUKGRES substation	✓			<ul style="list-style-type: none"> Benefits for the community

More detailed feedback from stakeholders is documented in the Stakeholder Engagement Plan, which includes meeting minutes, engagement techniques used, and attendance records.

8.5 Future engagement and disclosure activities

The following sections outline the activities on stakeholder consultation that Aktas Energy will carry out with the support of WSP, as indicated in the Exhibit A of the contract, during the next phases of the Project development.

8.5.1 Draft ESIA consultation and disclosure engagement

The draft ESIA consultation and disclosure engagement aims to gather stakeholder feedback on the draft ESIA. This phase ensures local stakeholders understand the predicted impacts and mitigation measures while incorporating their local knowledge into the assessment process. Stakeholders will also be able to confirm that their concerns and expectations have been considered.

Key activities include:

- Updating the SEP and Preparing Engagement Tools: this involves logistics planning, stakeholder mapping, response sheets, posters, and flyers to communicate ESIA findings; and
- Consultation and Disclosure of the Draft ESIA: Aktas Energy LLP will engage with stakeholders at national, regional, and local levels through meetings, focus groups, and individual discussions. Aktas Energy LLP will share the full ESIA, a non-technical summary and other documents (in English, Kazakh and Russian) for feedback. Special efforts will be made to include marginalized groups.
- Gathering feedback on Impact Assessment and Mitigation: Aktas Energy LLP will collect feedback from government bodies through written responses and from local communities via participatory techniques.

8.5.2 Engagement for the land acquisition process (pre- construction)

During the ESIA drafting phase, PAPs were identified. Therefore, engagement activities for the land acquisition process must be conducted before the start of construction.

Key activities include:

- A LRP according to the national legislation will be carried out. A socio-economic survey, then a census and eventually an asset inventory must be carried out with each landowner and informal land user (herders)

identified during the drafting of the ESIA to talk about compensation and livelihood restoration according to Kazakh law; and

Disclosure of the LRP and consultations with affected formal landowners / users (herders) affected by livelihood disruption.

8.5.3 Engagement during the construction phase

During the construction phase, key activities include:

- Information Disclosure: Providing transparent and accessible information about updated Project information and schedule of construction activities through official meeting with national and local authorities and through information boards and public meetings in villages affected with residents. Updates on construction schedule will also be uploaded on the Project website;
- Community Consultations: regular meetings with affected communities to discuss concerns, collect feedback, and integrate local perspectives into project planning;
- Grievance Mechanism for communities and workers: establishing a formal process for communities and workers to report complaints, ensuring timely resolution and response;
- Worker Engagement: engaging with employees and contractors to ensure fair labor practices, workplace safety, and adherence to human rights standards;
- Government & Regulatory Liaison: maintaining dialogue with local authorities and regulators to ensure compliance with legal and human rights obligations; and
- Security & Risk Management Engagement: Coordinating with security forces to uphold human rights principles while maintaining project safety and security.

8.5.4 Engagement during the operation phase

During the operation phase, key activities include:

- Engagement through official correspondence with local authorities to provide updates on community concerns;
- Public meetings held annually or every two years to discuss emerging issues and agree on solutions; and
- Focus groups to monitor project impacts for vulnerable groups (PAPs), inform about grant opportunities and support services.

8.6 Key Issues Identified to Date

The key issues identified during the engagement sessions conducted to date (namely Scoping and baseline data collection) are summarised in the tables below. The following table focuses on ESIA related comments and issues. These issues together with the findings of baseline data collection have been considered when compiling the Social Impact Assessment presented in the Impact Assessment for Social Components, under Chapter 05 of this ESIA report.

Table 5: Summary of the key issues identified during the engagement sessions (focus on ESIA comments and issues)

Issue Category	Issue	Concerns, expectations and suggestions expressed	Stakeholders Raising Issue
Social	Water resources	<p>Expectations:</p> <p>Stakeholders at all levels identified significant concerns around the perceived scarcity of water in the local area, and potential impacts from the Project-related activities, which may result in decline of water resources available for the local population and animals.</p> <p>Uneasiness:</p> <ul style="list-style-type: none"> ■ Drinking water problem and scarcity <p>Suggestions:</p> <ul style="list-style-type: none"> ■ Respect the conditions requested by the local communities of potential intervention and support from the Project on the restoration of water wells affected by construction activities following the Project's implementation. 	<p>Institutions – Government – District level</p> <p>Institutions – Government – Local level (rural district)</p> <p>Institutions – Government – Local level</p> <p>Local communities</p> <p>Public companies/entities</p>
Environmental	Ecology	<p>Expectations: The Zhusandala State Reserved Zone in the south and the Andasay State Nature Sanctuary in the Project site are identified to be areas that protected species like argali, goitered gazelles, and golden eagles are present on the site, and they may be impacted by the noise and wind turbine flickering and other project activities.</p> <p>Suggestions</p> <ul style="list-style-type: none"> ■ Adopting the compensation measures established in collaboration between Okhotzooptom and ACBK such as restoring habitats for argali after construction, including GPS collars for tracking argali's migration and measures to prevent bird collisions with turbines, including strategic turbine placement away from migration routes and automatic braking systems. ■ Develop a Biodiversity Action Plan which should focus on animal migration monitoring, habitat compensation, and budget allocation for these efforts. 	<p>National government Authorities</p> <p>Civil Society Organisations- Non Governmental Organisation</p> <p>Academic and research institutions</p>
Health	Basic sanitation	<p>Expectations:</p> <p>Stakeholders at all levels identified significant concerns around the perceived scarcity of water in the local area, and potential impacts from the Project-related activities, which may result in the decline of water resources available for the local population and animals</p> <p>Uneasiness:</p> <ul style="list-style-type: none"> ■ Non-use of sanitary facilities by the population because of lack of water <p>Suggestions:</p> <ul style="list-style-type: none"> ■ Respect the conditions requested by the local communities of potential intervention and support from the Project on the restoration of water wells affected by construction activities following the Project's implementation. 	<p>Institutions – Government – District level</p> <p>Institutions – Government – Local level (rural district)</p> <p>Institutions – Government – Local level</p> <p>Local communities</p> <p>Public companies/entities</p>

Issue Category	Issue	Concerns, expectations and suggestions expressed	Stakeholders Raising Issue
Access and use of land (and natural resources)	Land use	<p>Expectations:</p> <ul style="list-style-type: none"> ■ Comply with the law on land domain <p>Uneasiness:</p> <p>Herders that use land in the Project site for grazing are mobile and are accustomed to accessing land and resources in a seasonal nature. Therefore, they are identified as a potentially vulnerable group, and measures need to be developed to ensure that herders can adapt and benefit from any changes that the proposed Project brings.</p> <p>Suggestions:</p> <ul style="list-style-type: none"> ■ Keep continuous communication and coordination with the herders through the SEP and stakeholder engagement activities ■ Based on the outcomes of the above measure, develop a LARP according to the national legislation and a LRP 	<p>Institutions – Government – Local level</p> <p>Local communities</p>
Property rights	Land acquisition	<p>Expectations:</p> <ul style="list-style-type: none"> ■ Comply with the law on land domain <p>Uneasiness:</p> <p>-</p> <p>Suggestions:</p> <ul style="list-style-type: none"> ■ Keep continuous communication and coordination with the landowners through the SEP and stakeholder engagement activities ■ Based on the outcomes of the above measure, develop a LARP according to the national legislation and a LRP 	<p>Institutions – Government – Local level</p> <p>Local communities</p>

8.7 Engagement for the land acquisition process and follow up (LARF and LRP) and ICP

During the ESIA drafting, PAPs were identified. Engagement for land acquisition must occur before construction and throughout implementation of the framework for land, resettlement, and livelihood restoration. Aktas will follow a structured stakeholder engagement process aligned with IFC PS5/EBRD PR5, as outlined in the SEP, to ensure informed consultation and participation (ICP). The goal is for all Project-Affected Persons (PAPs), including vulnerable groups like informal herders, to be timely informed, meaningfully consulted, and able to shape decisions impacting their land and livelihoods.

The following measures will uphold ICP during land acquisition and livelihood restoration:

- The Livelihood Restoration Plan (LRP) and Guide to Land Acquisition and Compensation (GLAC) will be shared via public meetings, local Akimat info desks, and direct outreach to Project Affected Persons (PAPs). Notifications will be given at least two weeks prior through boards, online channels, and phone calls.
- Meetings and focus groups, conducted in Kazakh and Russian with visual aids, will be held at accessible locations with transport for remote PAPs and remote participation when needed. One-on-one consultations will address specific impacts like water well or grazing structure relocations, and all feedback will inform mitigation measures.
- A multi-level grievance redress mechanism (GRM) will be in place and well-publicized. PAPs can submit grievances through local Akimats or Community Liaison Officers (CLOs), with all cases tracked and resolved transparently. Stakeholder engagement and grievance processes will be monitored through surveys and interviews, using feedback to improve responsiveness to PAP needs.

The following are the stakeholder engagement methods and tools envisaged specifically for land acquisition related issues:

- **Committee Meetings.** Community-based committees ensure effective SE activities for implementing the LRP. These committees are led by district akims or chosen community representatives, including members from women, youth, herders, disabled, and other vulnerable groups identified in this LARF. Organization can be facilitated via local WhatsApp groups, recognized as the main communication tool in the Social Baseline Study.
- **Community Meetings.** General meetings will be held throughout LRP development and implementation to ensure transparency and inform the community about committee decisions. These meetings can be arranged through local WhatsApp groups and held at local akimats.
- **Focus Groups.** Focus groups enable in-depth discussions among specific community segments—such as women, landowners, and herders—by holding separate meetings to ensure inclusive participation. These sessions explore topics like wind power plant design, pastureland impact, land use surveys, resource dependency, migration, and community safety. They also address compensation preferences, equitable distribution, livelihood restoration, infrastructure needs, power dynamics, and host community safety. Participants benefit from sharing experiences and collaboratively solving problems.

8.8 Grievance Mechanism

The grievance mechanism (GM) provides for the grievance address of any actions and decisions that violate the rights and legitimate interests of citizens affected by the Project as well as workers. It also stipulates the procedure for dealing with grievances, from individuals and legal entities, within the Project implementation framework.

In accordance with the international lender's requirements (the IFC Good Practice Note on Addressing Grievances from Project Affected Communities, 2009 and IFC's CAO Advisory Note: A Guide to Designing and Implementing Grievance Mechanisms for Development Projects) the GM should be established immediately after the Project becomes effective. The GM is also regulated by the national legislation of Kazakhstan by the law "Law on the procedure for reviewing inquiries from individuals and legal entities, 2007. Aktas Energy LLP will be responsible for the establishment of this Grievance Mechanism (GM).

The Scope: The Project Affected People (PAPs) and all stakeholder groups will have the opportunity to file complaints and queries on any aspect of Project activity and land acquisition. The GM will serve to receive and facilitate resolution of complaints and concerns from affected stakeholders' and third parties' issues related to environmental and social performance. The scope of the grievance mechanisms does encompass complaints related to the activities of contractors and their employees associated with the project as well as grievances raised by contractors themselves in relation to the project. Complaints concerning labour-related issues involving workers employed in the site and contracted via labour or employment agencies fall within the scope of the project's grievance mechanisms and will be addressed accordingly. While contractors may operate their own internal grievance systems, they are required to promptly notify the project of any serious concerns or zero-tolerance within 48 hours of becoming aware of the incident.

Principles: Aktas Energy LLP ensures that grievances are addressed in a timely and satisfactory manner, aligning with the UNGP criteria and other international guidelines on effectiveness principles of the grievance mechanisms.

Right to Appeal and Access to Judicial Processes: All possible avenues are made available to the PAPs to resolve their grievances at the Project level and appeal of any decision is always possible. The use of project-level grievance mechanisms does not preclude, limit, or substitute the right of affected individuals to seek recourse through judicial or administrative channels.

Channels for Complaint Registration: The Project GM will be disseminated to PAPs through the consultation meetings, FGDs, and KIIs as well as published on the Project's website. Human Resources Department will be responsible in disseminating GM to workers. Complaints will be received through the following channels:

- Face to face communication with Aktas Energy LLP site management or contractors.
- Email addresses for Aktas Energy LLP grievance management staff will be outlined on the information boards: **@TotalEnergies.com**
- Phone numbers of the Project Manager and Community Liaison Officer of the Mirny WPP:
 - Aktas Energy LLP, building 15A, Kabanbay batyr avenue, Business Center "Q" Block A, 7th floor, 010000, Astana city, the Republic of Kazakhstan
- Grievance boxes that will be placed at Mirny Akimat and next to Kiyakty mosque and appropriate workplace and accomodation locations.

Complaint Registration: Upon receipt, each complaint will undergo an initial eligibility review to determine whether it meets the criteria for further assessment and registered in complaint log. Eligible complaints will be evaluated based on the severity of allegations presented. Complaints involving zero-tolerance concerns will be prioritised within 48 hours of receipt. For other types of complaints, will be acknowledged within 7 days of grievance reception. The Grievance Officer will conduct the eligibility assessment and registration.

Communication of the Receipt: The Grievance Officer will explain to the complainant the process and timelines for the remaining steps in the procedure and inform on how the complaint will be handled in case the complaint found eligible including existing confidentiality and safeguarding measures for sensitive cases. If it is

decided that a grievance is not valid or doesn't fall under the company's jurisdiction, the person responsible for the grievance resolution will notify the complainant.

Anonymity: The Grievance Officer will inform the complainant that the grievance can also be lodged anonymously should the complainant prefer it. Only good-faith anonymous grievances and complaints presenting significant reputational risk or raises serious concerns related to environmental harm or human rights violations will be investigated.

Safeguarding Measures for Zero- Tolerance Complaints: In instances involving zero-tolerance violations, appropriate safeguards will be implemented to ensure the complainant is protected from any forms of adverse consequences, including but limited to reprisal, retaliation or harm. Where GM is unable to provide adequate protection due to operational or jurisdictional limitations, and with the informed consent of the complainant, the matter may be referred to relevant local authorities or external support entities to ensure the complainants safety and wellbeing.

Protection from non-retaliation and reprisal: No organization, employer, or individual community member shall be subjected to dismissal, disciplinary action, or any form of harm, retaliation, or reprisal as a consequence of utilising the grievance mechanism.

Complaint Coordination Protocol: The GM is tailored to address all types of complaints associated with the project; however different personnel will be assigned to manage cases by the Grievance Officer depending if these are workforce related complaints, community related complaints or cross-cutting issues. In cases where a potential conflict of interest is identified—either with the nature of the complaint, the complainant, or when the complaint involves the Community Liaison Officer (CLO), Human Resources, or the Project Manager—the Grievance Officer may assign the matter to a third-party responsible for handling the complaint to ensure impartiality and integrity in the resolution process

Complaint Review: Complainant should also be provided with contact information of the person responsible for the resolution of their grievance and the estimated time for completion. The complaint review process may include dialogue, mediation or investigation depending on the nature of the complaint and expectation of the parties. Should no solution be reached through the approaches mentioned above, complainants will have an option to pursue other avenues for seeking redress. This appeal mechanism will involve a further extra-legal yet credible third party. The GM will promote dialogue between the parties as means to achieve the dialogue of the parties for the most efficient resolution and outcome of the complaint.

Monitoring: When corrective actions are agreed upon by Aktas Energy LLP and the complainant, the responsible manager will be responsible for ensuring corrective actions are implemented.

Communication of the Outcome: The outcome of the complaint process will be communicated to the complainant in writing, although a verbal response may also be provided where appropriate.

Further details on the functioning of the GM can be found in the Stakeholder Engagement Plan of the Project.

9.0 ESIA PACKAGE DISCLOSURE PROCESS

Mirny Project disclosure will start by late 2025, meeting EBRD Environmental and Social Policy (2019), PR 10, and IFC PS1 requirements. All main environmental and social documents will be public for 60 days, allowing stakeholders to review and comment. The disclosure will include these documents:

- **Environmental and Social Impact Assessment (ESIA);**
 - Environmental and Social Baseline Study (ESBS),

- Impact Assessment Study;
- **Management Plans Frameworks:**
 - Environmental and Social Management System (ESMS) Framework,
 - Land Acquisition and Resettlement Framework (LARF),
 - Biodiversity Management Plan (BMP),
 - Active Turbine Management Framework (ATMF);
- **Stakeholder Engagement Plan (SEP);**
- **Non-Technical Summary (NTS); and**
- **Environmental and Social Action Plan (ESAP).**

Considering the sensitive biodiversity related impacts addressed by the Project, Aktas commits to disclose a Biodiversity Action Plan Framework (BAP-F) 30 days post-disclosure.

SEP, NTS, ESMPs Framework and ESAP are published in English, Kazakh, and Russian on the Project website (<https://www.mirny.kz/>).

ESIA is published in English and Russian on the Project website (<https://www.mirny.kz/>).

Hard copies of the ESIA package will be available at local points like municipal offices and community centers in Mirny, Moyinkum, Chu, and Ulken. Public notices through newspapers, boards, and social media will invite stakeholders to consultation meetings.

Two (2) public disclosure meetings are foreseen in the month of February 2026; a disclosure meeting focused on environmental and social related issues will be organized in Mirny (*tentatively*) and a disclosure meeting focused on biodiversity related issues will be organized in Almaty (*tentatively*). Logistics for such meetings will be organized to facilitate the participation of all stakeholders from the communities of Moyinkum, Chu, and Ulken. Meetings will be organized in culturally appropriate ways, ensuring that vulnerable groups can participate fully. Feedback will be documented, and responses will demonstrate how stakeholder input influenced project decisions. The list of proposed engagement may be reviewed during the disclosure period in case specific needs will arise.

During disclosure, the Project's Communication Manager will handle website Q&As, coordinating with the Environmental and Social team, while the Community Liaison Officer will manage grievances. A QR code will allow easy grievance submissions via ads and newspapers. Disclosure and annual updates will continue throughout the project, with the grievance mechanism always accessible for concerns.

Queries and grievances throughout the whole disclosure period can be submitted through the following channels:

- **QR code:** scan the QR code provided in flyers that will be available in all villages interested by the disclosure as well as on the Project's website
- **Online:** <https://www.mirny.kz/>
- **By email:** grievances.mirny@totalenergies.com
- **By phone CLO:** +7 701 985 4180



wsp.com