



## REPORT

# Mirny (Kazakhstan) 1GW Wind Farm Project

## *Stakeholder Engagement Plan*

Submitted to:

**Aktas Energy LLP**

Aktas Energy LLP

Submitted by:

**WSP ITALIA srl**

Via Banfo 43 - 10155 Turin - ITALY

+39 011 2344211

24685792-003-R-Rev 03

December 2025



## Distribution List

Aktas Energy LLP

WSP Italia S.r.l.

## Disclaimer

This report is prepared by WSP Italia S.r.l. for the benefit of Aktas Energy LLP in accordance with the conditions set out in the Terms and Conditions agreed and signed by both parties.

To the extent practicable, WSP Italia S.r.l. relied on information made available by Aktas Energy LLP and the relevant Project consultants. However, most of the information is commercially sensitive and protected by confidentiality agreements between the parties to the contracts and its accuracy could not be independently verified.

## Prepared by

- Federico Breda – Project Director
- Barbara Scorza – Total Energies Program Manager
- Valeria Conti – Project Manager, Social Specialist
- Francesca Rossi – Social specialist

# Table of Contents

<b>1.0 INTRODUCTION .....</b>	<b>1</b>
<b>2.0 PROJECT DESCRIPTION .....</b>	<b>2</b>
2.1 Project Status and Schedule .....	4
2.2 Roles and Responsibilities .....	4
<b>3.0 STAKEHOLDER MANAGEMENT .....</b>	<b>5</b>
3.1 Objectives of the SEP .....	5
3.2 Principles of Engagement .....	5
3.3 Identification of the Project Area of Influence .....	6
3.4 Structure of the SEP .....	7
<b>4.0 APPLICABLE REQUIREMENTS.....</b>	<b>8</b>
4.1 National legislation on citizens engagement.....	8
4.2 International Requirements .....	10
<b>5.0 CONSULTATION UNDERTAKEN DURING THE SCOPING PHASE .....</b>	<b>12</b>
<b>6.0 PROJECT STAKEHOLDERS AND ENGAGEMENT STRATEGIES AND TECHNIQUES .....</b>	<b>14</b>
6.1 Stakeholder Identification and Mapping .....	14
6.2 Vulnerable Groups .....	21
<b>7.0 CONSULTATION UNDERTAKEN DURING THE ESIA DRAFTING PHASE .....</b>	<b>23</b>
<b>8.0 ENGAGEMENT PROGRAMME DURING THE PROJECT LIFECYCLE.....</b>	<b>24</b>
8.1 Engagement during pre-construction .....	24
8.2 Engagement during the construction phase .....	30
8.3 Engagement during the operation phase.....	35
8.4 Engagement for the land acquisition process and follow up (LARF and LRP ) and ICP .....	38
<b>9.0 GRIEVANCE MECHANISM .....</b>	<b>38</b>
<b>10.0 ROLES AND RESPONSIBILITIES .....</b>	<b>44</b>
<b>11.0 MONITORING AND REPORTING .....</b>	<b>46</b>
11.1 Process Record Keeping .....	46
11.2 Monitoring Activities .....	46
11.3 Internal Reporting.....	48
11.4 External Reporting .....	48

## **12.0 ESIA PACKAGE DISCLOSURE PROCESS .....49**

### **TABLES**

Table 1: Previous Stakeholder Engagement Activities.....	13
Table 2: Stakeholder engagement techniques.....	14
Table 3: Stakeholder identification .....	17
Table 4: Consultations undertaken and planned for the ESIA phase and National EIA .....	24
Table 5: Proposed Stakeholder Engagement Program during pre-construction phase.....	26
Table 6: Proposed Stakeholder Engagement Program during the construction phase .....	31
Table 7: Proposed Stakeholder Engagement Program during the Project operation phase .....	35
Table 8: Proposed Stakeholder Engagement Program during the land acquisition process and implementation of LARF-LRP .....	40
Table 9: Proposed consultations during the disclosure period.....	50
Table 10: Type table title here. ....	50

### **FIGURES**

Figure 1: Regional setting of the Mirny Project. ....	1
Figure 2: Project layout and components .....	3
Figure 3: Photographs of road access to the Project site.....	3
Figure 4: Construction organization chart.....	4
Figure 5: Stakeholder categorisation.....	17
Figure 6: Grievance Management Process for Workers and Community Related Complaints .....	42

### **APPENDICES**

#### **APPENDIX A**

Example of Stakeholder Engagement Activity Form

## LIST OF FREQUENT ACRONYMS

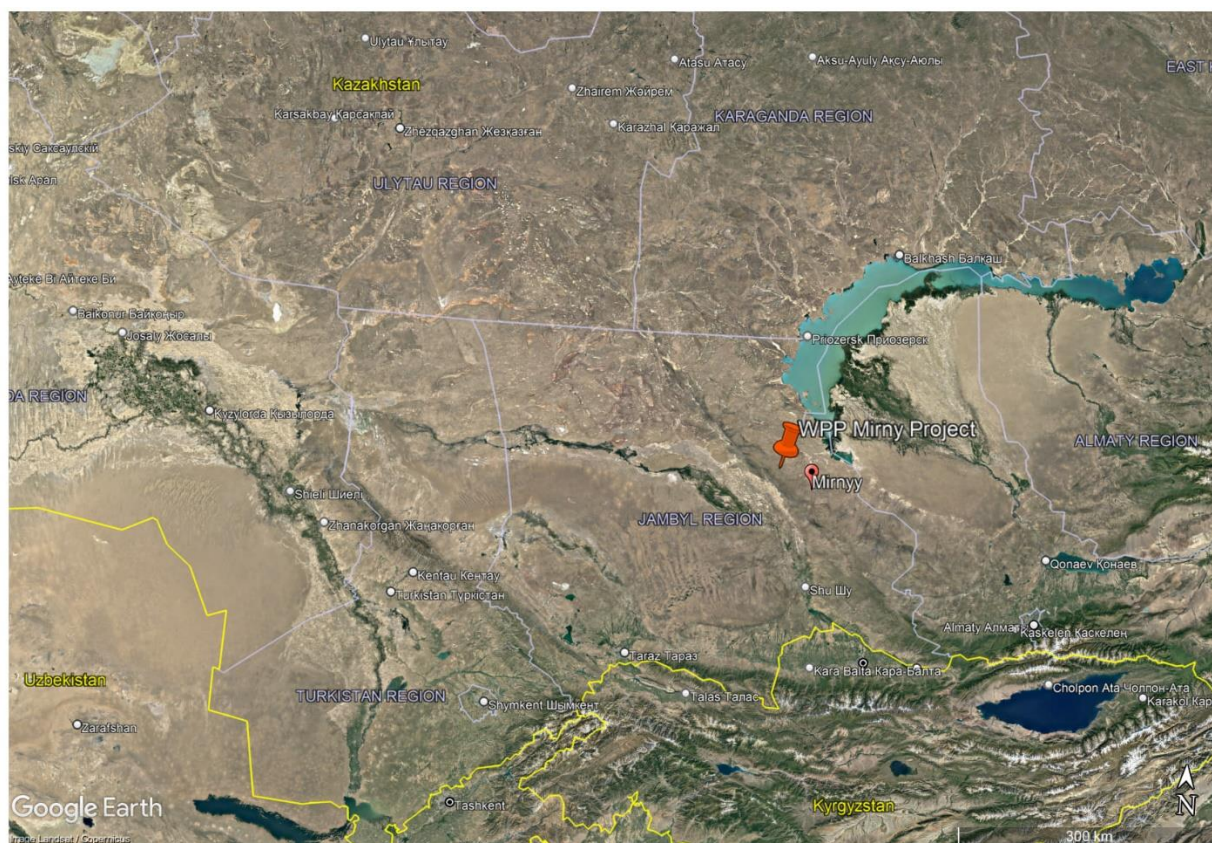
AoI	Area of Influence
CLO	Community Liaison Officer
E&S	Environmental and Social
EHS	Environment Health and Safety
EIA	Environmental Impact Assessment
EP IV	Equator Principles IV
ESIA	Environmental and Social Impact Assessment
GRM	Grievance Redress Mechanism
HSE	Health, Safety and Environment
IFC	International Finance Corporation
NGO	Non-Governmental Organization
PM	Project Manager
PS	Performance Standard
SEP	Stakeholder Engagement Plan
TE	TotalEnergies
WPP	Wind Power Plant
WTG	Wind Turbine Generator



## 1.0 INTRODUCTION

Aktas Energy LLP (“the Company” or the Client), in partnership with the National Wealth Fund “Samruk-Kazyna” and the National Company “KazMunayGas”, intends to construct an onshore wind farm of 1 GW installed capacity combined with a 300 MW/600 MW battery energy storage system (“the Project”).

Mirny Project will be located in the Jambyl Region in the South-Central part of Kazakhstan.



**Figure 1: Regional setting of the Mirny Project.**

The Client appointed WSP Italia S.r.l. (“WSP”) as Environmental & Social (“E&S”) consultant to prepare the Environmental and Social Baseline Study (“ESBS”) and the Environmental and Social Impact Assessment (ESIA) for the Project.

This document is the Stakeholder Engagement Plan (SEP) which integrates the ESIA process carried out in the period June 2024 – February 2025.

This SEP describes the planned stakeholder engagement process. A grievance mechanism for stakeholders to raise their considerations is also provided within this document.

## 2.0 PROJECT DESCRIPTION

The Project consists of building on a greenfield a 1 GW installed capacity Wind Power Plant (WPP) combined with a 300 MW/600 MW battery energy storage system. The Project will be located in the South-Central Kazakhstan, in Moiynkum District, Jambyl Region, near the settlement of Mirny, about 390 km northwest from the city of Almaty.

The Project is considered the largest wind energy initiative ever undertaken in Kazakhstan and will contribute to the country's green energy transition and is a strong ally for achieving the 2030 target. It is expected that the development of the Project will avoid the emission of approximately 3.5 million tons of CO<sub>2</sub>/year.

The electricity to be generated by the Project will be entirely sold to the Financial Settlement Center of Renewable Energy, a public entity owned by the Government of Kazakhstan, for the supply of the national grid. The Project will provide electricity to 1 million people.

In addition, the Project aims to support regional sustainable growth and contribute to local employment. Diverse educational programs involving the local population such as workshops on renewable energy will be conducted in cooperation with the local municipalities, and a center of expertise on storage will be created.

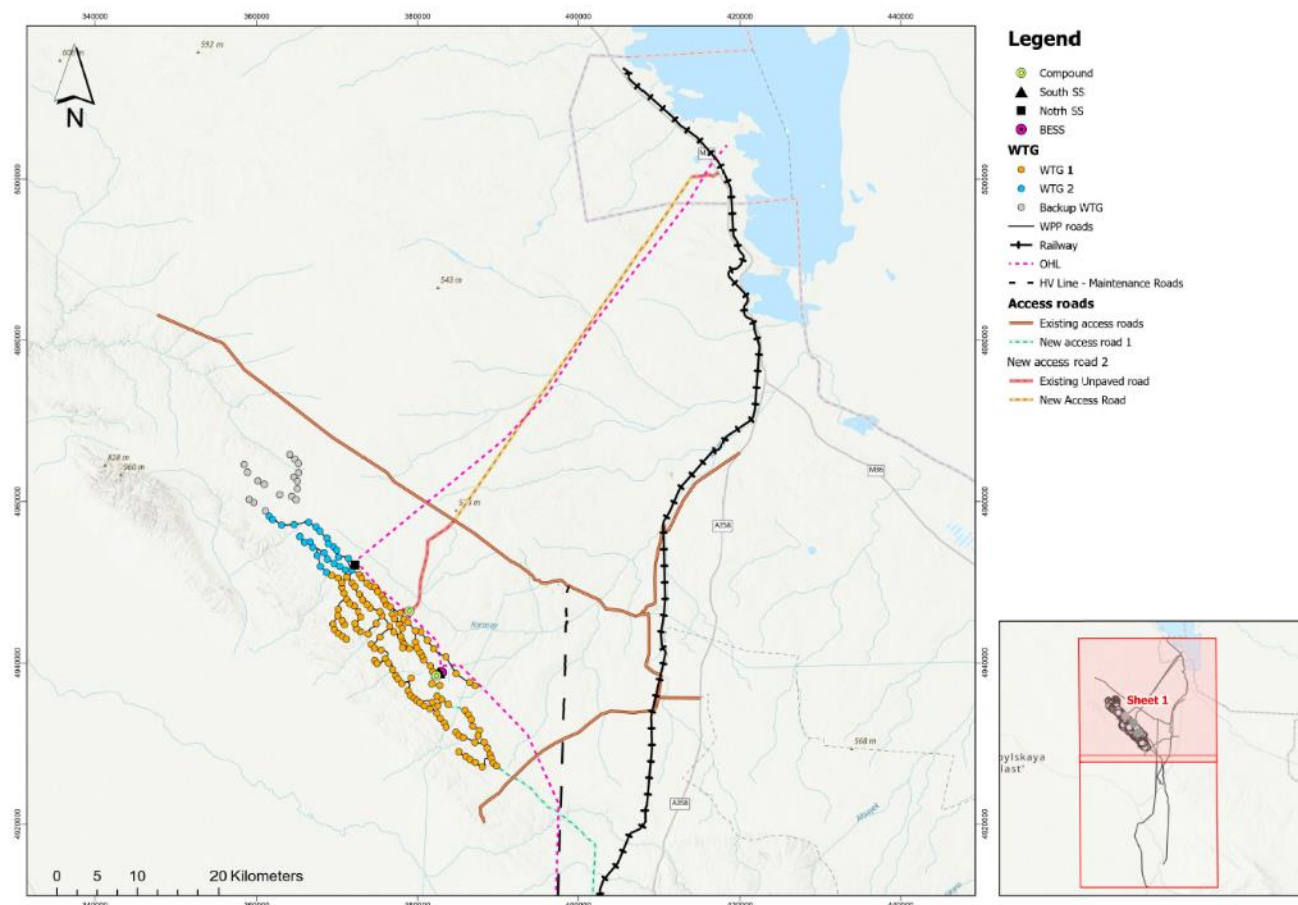
The Project will be located in the Moyynkum district of the Jambyl region, in south-eastern Kazakhstan, which has low population density due to the sandy deserts and the lack of water resources. The closest village to the Project is called Mirny, a remote settlement built for workers employed in uranium mining, an activity that is currently no longer carried out. When the local uranium mining ended, the population plummeted from several thousand to just a few hundred, as of today.

Based on the design information, the main components of the Project include:

- 150 new wind turbine generators (WTGs) and related foundations;
- Internal roads connecting turbines and substations;
- Access roads;
- Trenches for laying medium voltage ("MV") cables connecting the turbine generators;
- Step-up substations, one to the North Mirny SS and one to the South Mirny SS;
- BESS that will be operated by Kazakhstan Electricity Grid Operating Company ("KEGOC");
- OHTL between North Mirny SS and Yukgres SS, between South Mirny SS and Shu SS, and between North Mirny SS and South Mirny SS; and
- Reactive power compensating devices.

The Project site is currently accessible through existing roads (some are paved and others unpaved) that originate from the national road A-358. In addition, it is expected that 35 km of access roads and 160 km of internal roads will be further created to connect turbines and make them reachable for maintenance.

The following figures show the Project layout and components (i.e., WTGs, substations, BESS, construction camp/compound, OHTL, roads).



**Figure 2: Project layout and components**

The following Figure 3 shows photographs of the Project site access roads taken during WSP site visit.



**Figure 3: Photographs of road access to the Project site.**



## 2.1 Project Status and Schedule

The status of the Project and the planned schedule are summarised below:

- Engineering design-the Project is currently under the preliminary design, which includes preliminary routing and layout the detailed design phase is scheduled to start in early 2025;
- Land-the land is state-owned and made available for construction for the development of the Project. Next step would be clarification on land use, if needed;
- Construction schedule and workforce-the construction phase is expected to start by Q4 2025 and finish by June 2028.

## 2.2 Roles and Responsibilities

The Company is the Project owner and is developing the Project in partnership with the National Wealth Fund “Samruk-Kazyna” and the National Company “KazMunayGas”.

The Company established a headquarters in Kazakhstan with a team dedicated to managing the Project and supervising the construction through the appointed construction management company Aktas Energy LLP.

The Project Engineering, Procurement & Construction Contractor (“the Contractor”) has still not been appointed.

The following organization charts detail the control levels.

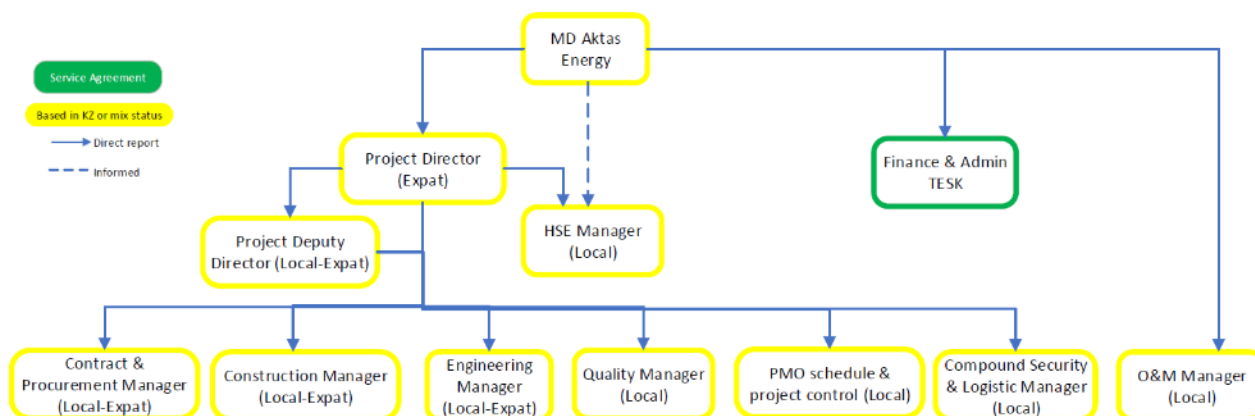


Figure 4: Construction organization chart.

## 3.0 STAKEHOLDER MANAGEMENT

### 3.1 Objectives of the SEP

The overall objective of the SEP is to define the stakeholder engagement process, provide information on disclosure activities and present the specific engagement activities that will be undertaken throughout the Project's lifecycle.

Within this document, stakeholders are defined as the various individuals or groups who: (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties), or (ii) may have an interest in the Project (other interested parties).

This SEP describes how to engage with local communities and other stakeholder groups who may benefit from, be affected by, and/or be interested in Project activities; also, it presents a grievance mechanism, through which stakeholders can present concerns and comments.

This SEP encompasses a range of activities and approaches and spans the entire life of the Project (planning, construction, and operation).

SEP objectives can be summarised as follows:

- Understand the stakeholder engagement requirements of national legislation and provide guidance to structured stakeholder engagement to meet the requirements of international standards;
- Compile stakeholder maps for the identification of the Project stakeholders and their categorisation considering their influence on the Project and on its activities;
- Identify the most effective methods of providing relevant, timely and accessible information to stakeholders in a culturally appropriate and understandable manner;
- Consult stakeholders on their opinions, concerns, preferences and perceived gains and risks, with respect to Project design, construction, and operation;
- Incorporate stakeholder feedback into the impact assessment process and into the development of management and mitigation measures to mitigate potential negative effects and to enhance possible benefits;
- Define internal and external reporting, as well as monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the plan based on monitoring results;
- Establish a formal grievance/resolution mechanism;
- Establish a two-way communication channel between the Project and stakeholders to communicate information, discuss and best address environmental and social impacts and issues, as well as benefits, associated with the Project.

### 3.2 Principles of Engagement

According to IFC Performance Standards (PS), the Project's stakeholder engagement process should follow the following principles:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;

- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a local language(s) and in a culturally appropriate format understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and
- Be documented.

The present SEP has been prepared taking into consideration these principles to establish an effective and meaningful engagement process throughout the different phases of the Project's lifecycle.

In line with the requirements of IFC's PS, during engagement activities, stakeholders will be provided with the following minimum information:

- Purpose, nature, and scale of the Project;
- Duration of the proposed Project activities;
- Any risks and potential impacts with regard to the environment, workers' health and safety, social impacts on communities plus the planned mitigation measures and management plans; and
- The envisaged engagement process and opportunities and ways in which the public can participate and can submit their grievances.

### 3.3 Identification of the Project Area of Influence

The Project Area of Influence that has been preliminary defined based on the anticipated environmental and social (E&S) impacts and availability of the Environmental Health and Safety (EHS) receptors broadly includes the following:

- Immediate Project site and the approaching roads, where physical disturbance of environmental and social receptors (including the neighbouring communities) might take place as a result of the presence of Project equipment and traffic movement;
- a 10 km radius around the Project footprint to assess potential environmental impacts on soil, air and water, and also the direct impacts connected to human receptors, such as noise, shadow flicker and waste generation.
- a 10 km radius around the Project footprint for the social baseline and social impact assessment to ensure an adequate assessment of liaison with communities and some specific impacts relevant to the generation of traffic, workforce and security;
- Area up to 70 km from the Project site, along the projected overhead transmission line up to Uken Village (depending on availability of environmental and social receptors and impacts identified), which could theoretically be affected indirect socio-economic impacts;

At around 70 km from the Project site there is Ulken settlement, where the Project HV lines are planned to arrive. Nearby Ulken, there is another village about 50 km from the Project site, called Shyganak. Other closest villages and identified settlements to the Project site are called Mirny (390 km northwest from the city of Almaty), Sholpan and Kiyakty, located around 10 km from Mirny. The villages are respectively around 24 and 28 km from the Project site. Therefore, the communities of these settlements consist of Project affected communities. Total

population is of around 500 (674 as per official statistics of registered residents) persons in Mirny and 225 in Kiyakty, but according to local residents it could be around 90 people. Kenes Village, on the route to Shu Substation from Ulken, is the only village crossed by the projected HV lines in the vicinity.

### 3.4 Structure of the SEP

This document is organised as follows:

- Chapter 1-Introduction and description of the Project.
- Chapter 2-Project Description.
- Chapter 3-Stakeholder Management.
- Chapter 4-Summary of the applicable requirements.
- Chapter 5-Previous stakeholder engagement.
- Chapter 6-Stakeholder engagement strategy and method.
- Chapter 7-Stakeholder engagement programme during Project lifecycle.
- Chapter 8-Grievance mechanism.
- Chapter 9-Roles and responsibilities.
- Chapter 10-Monitoring and reporting.

## 4.0 APPLICABLE REQUIREMENTS

The stakeholder engagement for the Project will comply with Kazakhstan national legislative requirements, the Company corporate policy on communication and engagement, and international standards. This section details the legal, regulatory, and the Company requirements pertaining to stakeholder engagement. It further outlines the standards for international good practice in stakeholder engagement which have informed the development of this document.

### 4.1 National legislation on citizens engagement

The Environmental Code of the Republic of Kazakhstan (2021 No. 400- VI) governs the protection, restoration and conservation of the environment, use and reproduction of natural resources and environmental impact in the ROK.

Article 5 point 9 emphasizes the principle of public participation in decision-making processes related to environmental protection and sustainable development in Kazakhstan. It asserts that the public has the right to engage in decisions that affect environmental issues, following the procedures outlined in the relevant legal framework. Public involvement is essential from the early stages of decision-making, ensuring that various options can be considered, and effective participation is facilitated. Government bodies and officials are required to promote transparency regarding proposed decisions that could impact the environment, allowing the public to express their opinions, which must be taken into account during the decision-making process. This principle underscores the importance of community engagement in fostering accountable governance and promoting sustainable practices in environmental management.

Article 13 emphasizes the fundamental rights and obligations of individuals and entities regarding environmental protection in Kazakhstan. It asserts that everyone has the right to a favourable environment, and the government guarantees several rights to the public, including access to timely and reliable environmental information, participation in decision-making processes, and the opportunity to discuss draft legal acts on environmental issues.

Citizens can report suspected environmental harm to relevant authorities and challenge governmental actions in court regarding environmental concerns. The article defines "the public" as individuals, legal entities, and organizations, asserting that preserving nature and managing resources responsibly is a collective duty. Both individuals and businesses are required to comply with environmental laws and contribute to protection efforts, ensuring that the responsibility for safeguarding the environment is shared among all members of society.

Article 14 outlines the rights of non-governmental organizations (NGOs) in Kazakhstan that are involved in environmental protection. In addition to the rights granted in Article 13, NGOs are empowered to develop, promote, and implement environmental initiatives using their own or attracted funding. They can engage individuals and legal entities in voluntary activities for environmental protection, undertake work to enhance the quality of the environment, and advocate for the rights and interests of citizens, including legal actions against government decisions.

Article 15 emphasizes the right of the interested public to participate in environmental assessment processes and other procedures that require public involvement, as dictated by the law. It defines "interested public" as those whose interests may be affected by environmental decisions or who wish to engage in the decision-making process. Non-governmental organizations whose objectives include promoting environmental protection are also recognized as stakeholders in this context.

The article establishes that representatives of the interested public are entitled to submit comments, information, analyses, or opinions concerning proposed activities or decisions, either in written, electronic form, or orally



during public hearings, when these are convened. Furthermore, any decisions made by government bodies regarding environmental matters must reflect the outcomes of public participation.

Lastly, officials or government entities responsible for environmental decisions are mandated to promptly inform the interested public about their decisions, providing the rationale and arguments that underlie those choices in a manner specified by the law. This framework promotes transparency and inclusiveness in environmental governance, enhancing community engagement in matters that impact their environment.

The company submits Proposed Activity Statement to the local environmental authority, based on this statement it is decided whether the Project will go through screening process based on the conclusion on the determination of the scope of the environmental impact assessment.

Article 73 of the Code claims that for a National Environmental Impact Assessment (EIA), there should be public disclosure for 30 days on the Government's website, including a public hearing meeting. The announcement of the public hearing must be made at least 20 days before the date. Any comment or suggestion from the stakeholders must be submitted during the meeting or through the governmental website and e-mail.

The Rules of Conduct of Public Hearings has been approved by the order of the Acting Minister of Ecology, Geology and Natural Resources of the Republic of Kazakhstan dated August 3, 2021, No 286 with amendments as of October 26, 2021. The rules state that public hearings are made in relation to projects that may create impacts on human health and affect the environment. Moreover, the proponent must arrange the public hearing to discuss the EIA materials, agreeing with local authorities and publishing in the media the announcement, 20 days prior the date of the hearing. The announcement must include contact details for offices where the public can review the documents. Minutes of the hearing must be created and then reviewed by the Proponent and make modification to the Project to include public suggestions.

The law on Access to Information (2015 with amendments as of 2023) regulates public's access to information and its right to familiarise with documents and sources of information. The legislation states that government agencies, public associations and media must provide information to the public free of charge.

Procedures on citizens engagement are also informed by the UNECE Convention on Access to Information, Public Participation in decision making and access to justice in environmental matters known as the Aarhus Convention that was ratified in 1998. The convention pillars are based on citizens access to environmental information and the obligation for public authorities to share it with the public. Moreover, the public has the chances to participate in decision-making processes and ensure procedural legitimacy and to judicial or administrative recourse procedure in case of violation of environmental law or principles.

## Grievances

The main law that includes mechanism for grievances and appeals, include:

- Law on the procedure for reviewing inquiries from individuals and legal entities, 2007.

The following prescription are to be followed:

- Complaints must be accepted without rejection as per the law;
- If a received complaint does not fall under the receiving body's responsibilities, it should be redirected to the relevant body within 3 working days. The person who lodged the complaint must be informed of the redirection;
- Complaints not requiring additional information or site visits must be reviewed within 15 calendar days;
- Complaints necessitating additional information, or a site visit must be resolved within 30 calendar days;

- The relevant body must inform the complainant about the outcome of the review once a complaint has been resolved;
- Anonymous complaints and those lacking clear information about the matter are not subject to review;
- The complaint should contain the name, position, and the name of the person whose actions are being appealed, along with motives and demands.

## 4.2 International Requirements

**International Finance Corporation (IFC)** requirements include IFC Performance Standard 1 that sets out the following requirements and guidance for stakeholder engagement:

- Stakeholder Engagement is an ongoing process that may involve, in varying degrees, [...] stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to affected communities (PS1-paragraph 25);
- A SEP will be developed and implemented that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities (PS1-paragraph 27);
- When affected communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner that provides the affected communities with opportunities to express their views on Project risks, impacts and mitigation measures, and allows the client to consider and respond to them (PS1 - paragraph 30);
- The extent and degree of engagement should be commensurate with the Project's risks and adverse impacts and concerns raised by affected communities (PS 1 - paragraph 30);
- The consultation process will be tailored to language preferences of affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups (PS1 - paragraph 30);
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation process (PS1 - paragraph 31);
- A grievance mechanism will be established to receive and facilitate the resolution of concerns and grievances about the client's environmental and social performance from affected communities (PS1 - paragraph 34).

**The European Bank for Reconstruction and Development (EBRD)** has outlined in its Environmental and Social Policy (2019) impact mitigation requirements and the accompanying Performance Requirement (PR) 10. The Project will therefore aim to be compliant with the requirements of this policy.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 on Information Disclosure and Stakeholder Engagement.

The EBRD's Environmental and Social Policy defines stakeholder engagement as an on-going process which involves the following elements:

- a. Stakeholder identification and analysis;
- b. Stakeholder engagement planning;
- c. Disclosure of information;

- d. Meaningful consultation and participation leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them;
- e. An effective grievance procedure or mechanism, and
- f. Ongoing reporting to relevant stakeholders.

The SEP should begin at the earliest stage of Project planning and continue throughout the Project life. An essential element in the stakeholder engagement process, to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations, and preferences. Special attention should be paid to the identification of vulnerable stakeholders. The engagement with these stakeholder groups needs to be planned and managed with special care. Furthermore, the EBRD requires that the Project developer establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints are received, handled, and resolved effectively, in a prompt and timely manner.

As stated in PR10, Category A projects (like the current Project) require that a formalised, participatory disclosure and consultation process is built into each stage of the ESIA. This involves incorporating into the decision-making process the views of affected parties on matters that affect them directly. Documents prepared as part of the ESIA for public sector projects are to be publicly disclosed for 120 calendar days. The ESIA documents are to be kept in the public domain throughout the life of the project, which for this Project is the responsibility of Aktas Energy LLP. The company is also to provide regular reports on environmental and social performance to stakeholders. These reports are to be disclosed at least annually.

## 5.0 CONSULTATION UNDERTAKEN DURING THE SCOPING PHASE

The identification of key stakeholders started during the scoping process and is listed in the stakeholder analysis presented in Chapter 6.0 below.

Two consultation meetings were conducted by TotalEnergies during the scoping phase 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. Over ten interviews were conducted with representatives of the national, local authorities and community groups in the form of semi-structured interviews and focus groups.

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 1 below outlines the two engagement activities for the scoping phase.

**Table 1: Previous Stakeholder Engagement Activities**

Date / Location	Stakeholder (Entity / name of contact)	Type of consultation	Main observations, recommendations and concerns expressed by the stakeholder
11.01.2023 The Ministry of ecology and natural resources of the Republic of Kazakhstan, Astana	Representatives from the Ministry of ecology and natural resources of the Republic of Kazakhstan; Committee of Forestry and Wildlife; Representatives from TotalEnergies.	Official meeting	<p>The discussion focused around the potential reduction due to the Project of the Zhusandaly Reserve Zone and the alteration of the designated purpose of the forestry territory.</p> <p>The Ministry recommended conducting a study on the biodiversity status and forecasting the potential impact of wind energy plant construction in these areas</p>
12.10.2023 / Mirny Village, Jambyl Region	<ul style="list-style-type: none"> <li>■ S**** A**** (Mirny Village Akim)</li> <li>■ K***** S***** (Messenger and cleaning lady at akimat)</li> <li>■ O***** I.***** Chef specialist akimat;</li> <li>■ A*****A.Sh. Head of Post in Mirny Village;</li> <li>■ A****A. Zh. Head of youth policy department;</li> <li>■ S***** K***** , First aid station nurse;</li> <li>■ A****+ S.O. Jambyl Region, Head of Environmental Programs Department;</li> <li>■ Dr. Rhys Bullman WSP;</li> <li>■ Barbara Scorza WSP;</li> <li>■ Federico Breda WSP;</li> <li>■ Tetiana Voitovych E&amp;S Coordinator, Totalenergies (TE);</li> <li>■ M***** A**** TREN KZ;</li> <li>■ M**** A***** TREN KZ;</li> <li>■ D*****H***** TREN KZ</li> </ul>	Semi structured interview	<p>The E&amp;S coordinator of TotalEnergies told about Mirny Project and current ESIA studies that are on-going now within the proposed Project sites and adjacent areas in the vicinity of Mirny. Main emphasis was made on presenting the environmental and social aspects of the Project and clarifying the stakeholder opinion about Mirny Project. The coordinator also did the brief overview of Biodiversity baseline studies (BBS) conducted by ACBK (national scientific team) and international WSP team, responsible for preparation of ESIA scoping report and supervision of BBS. The coordinator also described the possibilities for local people to receive jobs on the Project and the benefits from social Projects that are planned to be conducted in the framework of Corporate Social Responsibility (CSR) program.</p> <p>The head of the village spoke about the socio-economic conditions of Mirny Village as well as its main problems.</p> <p>The Jambyl Region Head of Environmental Programs Department spoke about the natural protected zones in the Moiynkum District and about protected species of animals. He confirmed that in the country, the environmental permit (OVOS) should be a standalone document and should include the results of BBS and prepared in line with national legislation.</p> <p>The first aid station nurse spoke about problematic issues related to the social sphere. There is no centralized water in the village and water is brought from Balkhash lake. There is also a problem with internet and mobile connection.</p> <p>She assumed that within the Project area, 4 families are engaged in grazing livestock.</p> <p>The representative of TREN KZ summarized the results and received positive feedback related to the construction of the windfarm in the vicinity of Mirny as it will open opportunities for local to receive jobs and conduct social Projects for the benefits of all villagers. The representative also exchange the contact details with local representatives for further meeting in the framework of stakeholder engagement process.</p>



## 6.0 PROJECT STAKEHOLDERS AND ENGAGEMENT STRATEGIES AND TECHNIQUES

### 6.1 Stakeholder Identification and Mapping

Comprehensive stakeholder identification is a crucial component of an effective and robust stakeholder engagement process. Accurate stakeholder identification reduces the risk of flaws in the stakeholder engagement process due to a lack of stakeholder representation. A broader stakeholder base will limit the risk for a narrow stakeholder group to dominate the consultation process.

Stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project. The stakeholder database will therefore be regularly maintained and updated to reflect the progress of Project activities.

The identification of stakeholders has been performed based on desktop review, on previous engagement activities carried out during the Screening Study undertaken by Mott MacDonald in April 2023 and the “Mirny WPP Environmental and Social Constraints report”, prepared by EcoSocio Analysts LLP, the scoping ESIA report and the engagement activities carried out during the ESIA drafting phase. In addition, the outcomes of the field visits performed have been used to populate the mapping.

Field visits were performed to visit the alternative Project sites and corridors for the OHTL and to meet with institutional and communities’ stakeholders. The field visits - conducted from October 9th to 12th, 2023 and from 8th to 10th of July 2024 - allowed obtaining a better understanding of the current socio-economic conditions for the communities surrounding the Project and hence identifying stakeholders that will be directly and indirectly affected by Project activities.

At this stage, stakeholders have been identified in terms of categories that will be potentially impacted; following SEP activities, preparation and implementation will allow having a further understanding of the specific stakeholders in each category.

In order to carry out an efficient stakeholder engagement process with stakeholders of all levels, the Project may use an array of techniques, presented in the table below. These techniques are among the most common used in engagement processes, with different objectives and targets. The specific engagement activities that are planned to be conducted for the Project, have been selected from the table below and are described for the different Project phases in chapter 8.0.

**Table 2: Stakeholder engagement techniques**

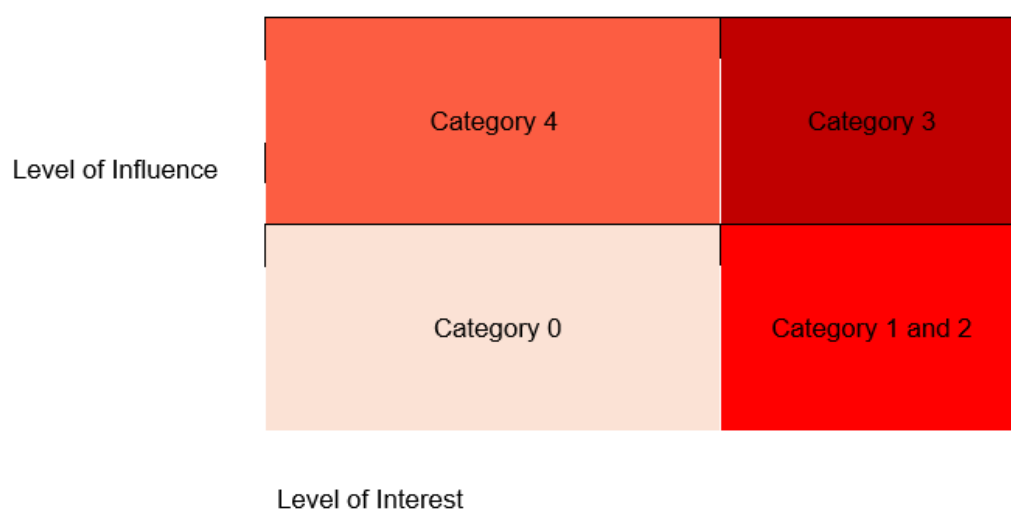
Engagement Technique	Objectives
Official correspondence and meetings (including e-mail, letters)	<ul style="list-style-type: none"> <li>Information dissemination with governmental/ public entities</li> </ul>
Information Boards	<ul style="list-style-type: none"> <li>Provide Project information in the community administration offices of settlements/villages in the Area of Influence, as well as along the main road. Information provided in the boards will include:</li> <li>General details in relation to the Project, including updates throughout the various phases;</li> </ul>

Engagement Technique	Objectives
	<ul style="list-style-type: none"> <li>■ Deviation routes and traffic management during construction;</li> <li>■ The Grievance Mechanism and contacts;</li> <li>■ Other relevant information deemed to be useful for stakeholders;</li> <li>■ Additional information boards to inform the population of specific activities will be placed on an as-needed basis;</li> <li>■ Job opportunities.</li> </ul>
Project website	<ul style="list-style-type: none"> <li>■ Present Project information and progress updates;</li> <li>■ Disclose standalone supplementary ESIA documents;</li> <li>■ Provide instruction and contacts details to get in touch with Aktas Energy LLP;</li> <li>■ Provide the grievance submission form;</li> </ul>
Radio, newspapers, and other media such as Moyinkum Tany and Jambyl TV	<ul style="list-style-type: none"> <li>■ Disseminate Project information to large audiences also beyond the Project area;</li> <li>■ Inform stakeholders about consultation and public meetings including national EIA process;</li> <li>■ Inform stakeholders about Project updates.</li> </ul>
Public meetings	<ul style="list-style-type: none"> <li>■ Present and distribute Project information to a large audience of stakeholders;</li> <li>■ Allow the group of stakeholders to provide their views and opinions;</li> <li>■ Build relationships with communities.</li> </ul>
One-to-One meetings	<ul style="list-style-type: none"> <li>■ Seek views and opinions from specific stakeholders;</li> <li>■ Enable stakeholders to speak freely about sensitive issues;</li> <li>■ Build a personal relationship;</li> <li>■ Ensure the participation of vulnerable groups;</li> <li>■ Discuss mitigation measures with specific stakeholders that will be more affected;</li> <li>■ Address grievances raised by stakeholders.</li> </ul>
Focus Group Discussions and Key Informant Interviews	<ul style="list-style-type: none"> <li>■ Allow smaller groups to provide their views, opinions and targeted information;</li> <li>■ Build relationships with communities;</li> <li>■ Use a focus group interview guideline to facilitate discussions;</li> <li>■ Record responses and opinions of stakeholders.</li> </ul>
Informal meetings with stakeholders in the Project Area	<ul style="list-style-type: none"> <li>■ Share information on Project schedule and plan of Project Day to day activities;</li> <li>■ Continuously keep stakeholders informed on the progress of activities.</li> </ul>

Engagement Technique	Objectives
Training and Seminars	<ul style="list-style-type: none"> <li>Conduct training sessions with workers to inform them on their rights and social requirements and the availability of grievance mechanism</li> </ul>
GM boxes	<ul style="list-style-type: none"> <li>Install GM boxes in both communities for collection grievances and concerns, including anonymous.</li> </ul>
What's App chats	<ul style="list-style-type: none"> <li>Invitations to public meetings;</li> <li>Announcement about business and job opportunities.</li> </ul>

Stakeholders have been identified and categorized as either directly or indirectly affected. Within this Plan, they are further divided into four subgroups, classified not only by the level of impact but also by their interest in and influence over Project activities, also related to resettlement and livelihood restoration.

- **Category 1:** Directly affected stakeholders: who are individuals and communities directly impacted by the Project activities and face potentially physical or economic displacement; either temporary or permanent and include those identified in the baseline assessment as well as those identified as Project Affected People (PAP) identified under the Land Acquisition and Resettlement Framework (LARF), such as local herders. This category also includes their potential representatives. They represent the main target audience for stakeholder engagement activities.
- **Category 2:** Indirectly affected stakeholders who are not physically or economically displaced but whose livelihoods may nonetheless be adversely affected. Depending on the severity of impacts, some members of this group may be entitled to transitional support measures. This category may include those who live near the project footprint or have a vested interest in the Project, such as vulnerable groups, stakeholders involved in the land-acquisition process, International Finance Institutions/ Lenders, Civil Society Organisations, NGOs, Media, and academic and research institutions.
- **Category 3:** Governmental and semi-governmental stakeholders at both national and local levels: who hold decision making power over project activities. Their interest lies in ensuring regulatory compliance and in oversight. This category may also include the Lenders.
- **Category 4:** Stakeholders with interest in communication and coordination: which may include groups, institutions and civil society groups that can be engaged in dialogue, collaboration and supplementary activities. Their involvement supports transparency, fosters cooperation and contributes to meaningful engagement.



**Figure 5: 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 3. The list of stakeholder groups should be regularly reviewed and updated throughout the Project lifecycle and whenever new information is received.

The stakeholder category identification table is provided below with possible communications methods identified for each stakeholder.

**Table 3: Stakeholder identification**

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

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



Stakeholder category	Type	Engagement strategy
■ Category 3	Institutions - Government - Local level	
	<ul style="list-style-type: none"> <li>Representative/ Akim of Mirny Village</li> <li>Representative/ Akim of Ulken Village</li> <li>Representative / Akim of Shyganak Village (near Ulken Kamkaly lake)</li> <li>Representative / Akim of Kenes Village</li> <li>Environmental association OkhotZooProm</li> </ul>	<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><b>Mirny Village:</b></p> <ul style="list-style-type: none"> <li>Community hall Mirny Representatives</li> <li>Post Office Mirny representatives</li> <li>School of Mirny representatives</li> <li>Medical centre Mirny representatives</li> </ul> <p><b>Kiyakty Village:</b></p> <ul style="list-style-type: none"> <li>Railway station representatives in Kiyakty</li> <li>Social (Health or educational) infrastructures in Kiyakty</li> <li>Village elders</li> </ul>	<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&amp;S requirements by Aktas Energy LLP</p> <p>Performance and reporting by contractors</p> <p>Bulletin updates (via email, SMS &amp; notice boards) on Project developments and Worker Grievance Procedure.</p>
■ Category 4	Suppliers	
	Suppliers	<p>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.</p>
■ 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>

Stakeholder category	Type	Engagement strategy
		<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"> <li>■ Mirny community</li> <li>■ Kiyakty community</li> <li>■ Shyganak community</li> <li>■ Sholpan community</li> <li>■ Ulken community</li> <li>■ Kenes community</li> <li>■ Khantau community</li> <li>■ Qatari group</li> </ul>	<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 as<sup>2</sup>:</p> <ul style="list-style-type: none"> <li>■ Audio and video with synchronised captions, transcripts and signposting</li> <li>■ Forms and surveys including audio, video, drawn or handwritten responses</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text</li> <li>■ In person and remote accessible presentations</li> </ul>
	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>

<sup>2</sup> [Good Practice Guidelines for Engaging with People with Disability](#)

Stakeholder category	Type	Engagement strategy
Category 2	Civil Society Organisations - Non Governmental Organisation	
	<p>Local NGOs (women's association, environmental associations, elderly associations, youth associations etc)</p> <ul style="list-style-type: none"> <li>■ Jambyl Business Women's Association</li> <li>■ Zhandanu -Rights and Opportunities for the Disabled</li> <li>■ Nakty Komek</li> <li>■ Youth organization Ak Zhelken</li> <li>■ Youth organization Zhangyru Zholy</li> <li>■ Youth League</li> <li>■ Republican Youth Movement</li> <li>■ Assembly of the People of Kazakhstan in the Jambyl Region</li> <li>■ Environmental association Taza Kazakhstan</li> </ul> <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"> <li>■ Association of Kazakhstan for the conservation of biodiversity (ACBK)</li> </ul>	Official correspondence and meetings.
■ Category 4	Media	
	<ul style="list-style-type: none"> <li>■ Local TV</li> <li>■ Local media</li> <li>■ Local influential bloggers, owning news channels on telegram and Instagram</li> </ul>	<ul style="list-style-type: none"> <li>■ Sharing information about the Project's progress on Project website</li> </ul>
■ 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&amp;S reports, including grievances and accidents/incidents</p> <p>Periodic e-mails communication on Project updates and occasional face to face meetings</p>

Stakeholder not identified at this phase of the process should contact the HSE Manager or other members of local authorities to be engaged and included. Contact details are provided in section 0.

## 6.2 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).

Social impacts are often experienced very differently by men and women. Rather than carry out a separate gender analysis, the aims of the stakeholder engagement in the framework of the social impact assessment will be to mainstream gender, so that is considered in all stages. In a similar manner, the issues and concerns of minorities must be identified and addressed.

A list of groups that could be vulnerable or disadvantaged in relation to the Project is presented below and is based on the outcomes of the socio-economic baseline study performed, field observations, interviews and secondary data sources. This list will be refined throughout the stakeholder engagement activities:

- Land users (herders): nomadic people or herders may have specific resource or land- use dependance 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) or households with people with disabilities: 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. These households may also find it harder to reach and access health clinics during the construction phase of the Project due to road closures and diversions;
- 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.<sup>3</sup> 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. Furthermore women who

---

<sup>3</sup> [SDG Report WEB](#)

are widows and heads of households may be more vulnerable than men to Project impacts due to restricted employment opportunities and lower wages;

- **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%.
- **Youth:** official statistics show a trend of young people leaving rural areas in the Area of influence 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.



## 7.0 CONSULTATION UNDERTAKEN DURING THE ESIA DRAFTING PHASE

The primary purpose of this phase was to gather primary data for the socio-economic baseline and provided stakeholders an opportunity to provide feedback or ask any questions regarding the proposed Project. These data are included in the social baseline section of the ESIA report and provide insights to the social impact assessment included in the same report.

Stakeholder engagement during this phase included meetings with key government stakeholders at National and Local level, community-based organisations and local communities.

Engagement objectives during baseline data gathering included:

- To understand the existing environmental and socio-economic context of the Project Area;
- 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 in the implementation of information disclosure and mitigation measures.
- To receive stakeholder feedback in order to differentiate between stakeholder perceived as impacted and actual impacts.

Communities engaged were selected based on the following characteristics:

- Proximity of the community to the Project footprint;
- Communities who own land or/and have the right to use the land in-and-around the Project footprint;
- Level of vulnerability;

A series of consultations were carried out by TotalEnergies and Green Operating during the development of the ESIA, between the 10<sup>th</sup> of February 2024 and the 09<sup>th</sup> of January 2025. These included seventeen meetings in total, including official and informal meetings, surveys and official and informal interviews. Over hundred engagements were conducted with stakeholders involving national and local government and authorities, community members, civil society organisations and NGOs.

The meetings held were carried out in collaboration between Green Operating and TotalEnergies; the meeting on the 9<sup>th</sup> of July were held by Yuliya Allakhverdiyeva - Green Operating and Marat Amirseitov and Abzal Mukhtarbekov from TE. The meetings held on the 10<sup>th</sup> of July 2024 were held by Abat Amankul and Yuliya Allakhverdiyeva - Green Operating, supported by TE's Marat Amirseitov, Kairat Seitkaliyev, and Abzal Mukhtarbekov.

The Table 4 below outlines the engagement activities for the ESIA phase and National EIA disclosure process.

**Table 4: Consultations undertaken and planned for the ESIA phase and National EIA**

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
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.	Completed	Official meeting	<p>The Company provided an update on the progress of research and the development of a compensation measures program in collaboration with Okhotzooptom and ASBC. A chip tagging solution for Argali sheep was proposed, and a Memorandum of Understanding (MoU) was suggested to outline key directions and timelines for stakeholder involvement. The need for an experienced company to handle chip tagging was emphasised along with the Okhotzooptom's role in animal control and capture. Participants also requested clarification on the position of Qatari representatives, who conduct hunting activities in the area.</p> <p>Participants discussed steps to reduce bird collisions with turbines, such as positioning turbines away from migration routes and using automatic braking systems further noting that international bank requirements for biodiversity protection should be considered.</p> <p>It was noted that part of the project area overlaps with forest fund lands. A participant suggested collaborating with the forest owner to clarify the land's status and avoid unnecessary reclassification.</p>
				L *** V***** Chernodarov, TE.			
				M**** A*****, TE.			
2	08/07/2024	Shyganak Village	Local communities	Roadside car service shop owner	Completed	Informal interview	During this visit, Green Operating LLP engaged with the business owners to gather insights and data. The discussions focused on understanding the social dynamics and issues pertinent to the local community.
				Roadside café owner		Informal interview	During this visit, Green Operating LLP engaged with the business owners to gather insights and data. The discussions focused on understanding the social dynamics and issues pertinent to the local community.
3	09/07/2024	Shyganak Village	Institutions-Government-Local level	Village Akim Shyganak	Completed	Informal interview	The team met with the village Akim to update him on the ongoing project. The Akim confirmed his prior awareness of the Project and expressed his readiness to provide any necessary assistance. He also mentioned that that day, five individuals approached him after being released from a road construction project, seeking employment opportunities. This highlights the local community's need for job opportunities, which the project could potentially address.
4	09/07/2024	Kiyakty Village	Local communities	Residents in Kiyakty and a local activist	Completed	Informal meeting	The residents were informally interviewed and eventually responded positively to the proposed windfarm project. While there, the team waited for a local activist, a key community figure who had led the construction of the village mosque. The activist requested a formal meeting with the village elders to discuss the project in depth, stressing that the community's support depended on ensuring no harm would come from it. Furthermore, the villagers raised concerns about ongoing water shortages, identifying it as a crucial issue that the project could potentially help address.

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
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.	Completed	Official meeting	Each participant actively took part in discussions about the project. Overall, the response was positive, with attendees expressing hope for the job and business opportunities the project could create. Residents who have opportunity to provide services such as accommodation and meals exchanged contacts with TotalEnergies representatives.  Two key concerns emerged: poor mobile coverage and an insufficient supply of drinking water.
6	09/07/2024	Mirny Village	Local communities	50 including the hotel owner, shop owner, local ambulance driver, and numerous residents.	Completed	Survey	After the meeting of the 09/07/2024, the team carried out additional interviews in Mirny village with various community members, including a hotel owner, a shop owner, a local ambulance driver, and several residents by visiting their homes. In total, more than 50 individuals were surveyed, offering valuable insight into the community's views and needs.
7	09/07/2024	Project Site	Local communities	Herders and landowners	Completed	Interviews and surveys	Interviews were conducted with landowners and over ten herders available on the Project site to gain insight into their views on the proposed wind farm.  Most herders are self-employed, renting land independently, while some work for larger operations. Their “camps”, consisting of temporary containers or yurts, remain in the same locations each year for few months, as evidenced by the presence of drilled water wells. These camps are seasonal, meaning herders move between them depending on the time of year. No crop-cultivating farmers were identified.  The team also gathered information about the landowners, the majority of whom are based in Almaty or other regional centres. Among the 17 landowners identified, not all are actively involved in livestock grazing or employ herders, making it difficult to verify their exact level of engagement. Those interviewed generally had no objections to the project, provided that conditions such as the restoration of water wells after implementation are met. Owners did not express any concern about the Project as long as they get compensated with the same land conditions in the area, emphasizing the importance of maintaining clear communication and coordination with the Moiynkum akimat.
8	09/07/2024	Project Site	Institutions- Government- District level	Chief Inspector of the Moiynkum district	Completed	Informal interviews	The Chief Inspector of the Moiynkum district was interviewed and stated that he had no objections to the project, as long as it did not cause significant environmental harm and created new job opportunities in the region.
				Inspection team from OkhotZooProm		Informal interviews	
9	10/07/2024	Khantau Village	Institutions- Government-Local level (rural district)	Local akimat employees	Completed	Official meeting	A meeting was held with local Akimat employees. They shared their readiness to support the Project as it is expected to create jobs and tax revenue for the district.
			Local communities	Khantau Village residents		Interviews	Interviews with random residents revealed that they were not previously aware of the upcoming construction. However, their responses were generally positive, with

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
							many expressing optimism about the potential economic benefits and job opportunities that the project could bring to the community.
10	10/07/2024	Moynkum Village (administrative center of Moynkum district in Moynkum village)	Institutions Government District level	<div>Interim akim Mr. S****</div> <div>T****</div> <div>Head of the land management unit Mr. Yeldar Kokushev</div> <div>The business development specialist of the Akimat</div>	Completed	Official meeting	<p>During the visit to the Akimat, the Green operating team interviewed interim Akim and the head of the land management unit.. Participants expressed a positive outlook on the project and discussed the local economy, social issues, and business environment. They also shared information on local grievance redressal mechanisms through social networks, providing key social media pages.</p> <p>Furthermore, the business development specialist from the Akimat outlined the local business development strategy, while other participants provided insights into land management practices and the allocation of land plots in the district.</p>
11	10/07/2024	Shu Substation	Internal stakeholder	Chief Engineer C***** J*****	Completed	Official meeting	During the visit, the Chief Engineer led a tour of the substation and was interviewed about key social and organizational issues. The discussion focused on the construction of new overhead lines from the project area. He also provided valuable insights into the operational and logistical aspects of these changes, highlighting their potential impacts and benefits for local infrastructure and the community.
12	10/07/2024	Kenes Village	Local communities Public companies/entities	<div>Kenes village residents</div> <div>Local medical unit workers</div>	Completed	<div>Informal interviews</div> <div>Informal Interviews</div>	The interviewed residents and workers at the local medical unit were largely unaware of the existing OHTL system nearby. The nearest point to the residential area is approximately 500 meters. Local residents are largely unaware of the existing OHTL system nearby.
13	10/07/2024	Ulken Village YUKGRES substation	Local communities	Ulken village residents	Completed	Interviews	The interviewed villagers expressed no concerns regarding the construction process. Instead, they provided positive feedback, showing support for the development of the wind power plant and its anticipated benefits to the community. The nearest point to the residential area is approximately 1 km. The local residents are largely unaware about nearby substation activities.
14	11/07/2024	Kanshengel Village	<div>Institutions Government Local Level</div> <div>Civil Society Organisations- Non Governmental Organisation</div>	<div>S**** O****, OkhotZooProm;</div> <div>A***** A**** OkhotZooProm</div> <div>B***** D*****, OkhotZooProm</div> <div>Ilya Chernodarov, TE;</div> <div>Abzal Mukhtarbekov, TE;</div> <div>Marat Amirseitov, TE;</div>	Completed	Official meeting with OkhotZooProm representatives	<p>RGKP "PO OkhotzooProm representatives proposed alternative sites 20 km north and south of the requested locations and inquired about the construction timeline. Ilya Chernodarov (Aktas Energy LLP) clarified that, due to the region's specific wind potential, the optimal site cannot be relocated without significantly reducing energy production. He detailed that construction will last 3 years (with 1.5 years of active work) and highlighted TotalEnergies' commitment to stringent environmental and social standards.</p> <p>Representatives from OZP emphasized that the project area, located on reserve lands, is crucial for local wildlife - particularly argali, which use the territory for grazing - and called for robust compensatory measures. One of the participants stressed the need to protect migration corridors and adjust turbine placement to minimize habitat disruption. Proposed mitigation actions include biodiversity</p>

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
				Kairat Seitkaliyev, TE.			monitoring (with satellite tracking of argali), water source provisions, and limiting simultaneous construction to preserve migration paths.
				S***** S*****, ACBK			
				A***** K****, ACBK			
				Abat Amankul, Green Operating LLP			All parties agreed on the necessity of rapidly developing a comprehensive set of compensatory measures and drafting a Cooperation Agreement to protect the Zhussandaly State Reserve. A follow-up meeting with final decisions is scheduled for the end of August 2024.
				Yuliya Allakhverdiyeva, Green Operating LLP			
				Guillaume Capdevier TE;			
				Veronica Charlot, TE;			
				Tatyana Voitovich TE;			
				Rhys Bullman, WSP			
15	30/08/2024	Almaty, Kazakhstan.	Institutions Government Local Level	S*** N***** O***, RSE "PO "Okhotzooptom";	Completed	Official meeting with OkhotZooProm representatives	Okhotzooptom representative provided an overview of the project, highlighting its unique location in a specially protected natural area rich in biodiversity. He noted that the area hosts several Red Book species, including argali, gazelle, houbara bustard, saker falcon, and golden eagle. While an alternative site was considered to reduce environmental impact, the current location was chosen for its optimal wind conditions. During discussions with Totalenergies and ACBK , various mitigation strategies were proposed, such as temporary resettlement during construction and installing monitoring systems. Additionally, ACBK suggested equipping argali with GPS collars to track their migration and establishing long-term monitoring programs. The next steps include formalizing a memorandum of understanding with the Forestry and Wildlife Committee, initiating the GPS tracking of argali, and continuing joint discussions to refine the mitigation strategies.
				Abzal Mukhtarbekov, TE;			
				Marat Amirseitov, TE;			
			Civil Society Organisations-Non-Governmental Organisation	Guillaume Capdevier TE;			
				Veronica Charlot, TE;			
				Tatyana Voitovich 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	Completed	Official meeting	Ilya Vladimirovich reported on the progress made in developing a compensatory measures program with OkhotZooptom and ACBK, including the proposal to chip argali. It was suggested that a Memorandum of Understanding (MoU) be signed to outline the main directions and timing of the parties' involvement. Andrey Vitalievich emphasized the need for an experienced company to handle the chipping process and OkhotZooptom's role in animal control. He also requested clarification on the position of the Qatari, who have hunting activities in the area.
				Ilya Chernodarov, TE;			

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
				Marat Amerseitov, TE;			<p>Regarding bird migration, Ilya Vladimirovich discussed measures to prevent bird collisions, such as placing turbines away from migratory routes and using automatic braking systems. Andrey Vitalievich highlighted international biodiversity requirements for financing.</p> <p>It was noted that part of the project area falls within forest fund lands. Andrey Vitalievich proposed clarifying the status of these lands with the forest owner to avoid unnecessary land transfers.</p>
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 "OkhotzooProm" 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	Completed	Official meeting with OkhotZooProm representatives	<p>Sergey Orlov provided details about the Zhusandaly State Reserve Zone, located across the Almaty and Zhambyl regions, covering 2,757,008.68 hectares. He emphasized the need for a memorandum of cooperation with the Forestry and Wildlife Committee to address biodiversity preservation during the project.</p> <p>Orlov also discussed the proposed microchipping of argali, suggesting it be postponed until August-September 2025 due to seasonal restrictions. Alternatively, observation posts could be installed to monitor animal migration paths. He stressed the importance of developing a joint Environmental Action Plan that includes increased monitoring and compensation measures for animal habitats within Kazakhstan, along with a budget allocation for these activities. TE presented a draft Memorandum for cooperation on biodiversity protection during the project. ACBK revised the draft, and representative from OkhotzooProm proposed submitting his own version by February 1, 2025. After this, the draft will be reviewed by the Forestry and Wildlife Committee, with final approval and signing to follow.</p>
18	October 2025	Jambly. Region Moynhikum, Shu District	CSO Institutions- Government Local-Regional	List of all participants available at the EPA Portal	Completed	National EIA Disclosure Public Hearings	<p>In accordance with legal requirements, public hearings were held in four villages of the Jambyl Region—Moynkum District (Mirny village) and Shu District—between October 28 and 31. A total of 83 participants attended these hearings. The events were announced through local newspapers, the official website, and printed notices.</p> <p>During the hearings, project information was presented to participants, and video conferencing options were made available to ensure broader accessibility. Key topics of interest included employment opportunities, infrastructure improvements, and social projects for local communities. Representatives from NGOs raised concerns regarding the potential impact of the project on bird populations including preference</p>



No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
							<p>of blade types for wind turbines, risk of bird colliding and impact of noise and vibrations, further requesting clarification on mitigation measures.</p> <p>The Aktas Representatives noted that the national EIA has limitations to address issues concerning biodiversity at such level of details however as per the international requirements comments of the NGOs representatives will be incorporated into ESIA and already addressed via mitigation measures such as Active Turbine Management for avoiding bird collusion and other measures will be also available in the Biodiversity Management Plan. The collaboration with OkhotZooProm on mitigation measures was also highlighted to address those concerns.</p> <p>Some representatives from communities raised questions on the compensation measures and payment timelines for landowners and relocation. Questions have been raised on the potential of using the land for grazing, mushroom picking after the construction process of wind towers. All questions and inquiries were answered by the representatives noting that the use of land for grazing and other services will be possible.</p>
19	18/12/2025	Almaty, Kazakhstan	Civil Society Organisations-Non-Governmental Organisation	Bird Life	Completed	Official meeting	<p>During the meeting with BirdLife several key environmental issues were discussed, and corresponding actions were agreed upon to address them collaboratively:</p> <ol style="list-style-type: none"> <li><b>Protected Tulips:</b> BirdLife raised concerns regarding the mitigation measures for protected tulip species. In response, Aktas committed to organizing a dedicated meeting with leading experts from the Institute of Botany of Kazakhstan. This meeting will aim to clarify and refine the proposed mitigation strategies.</li> <li><b>Bird Mitigation Strategy:</b> BirdLife expressed general agreement with the proposed bird mitigation strategy. However, they emphasized the importance of halting construction activities within active nesting areas to prevent disturbance. To ensure this measure is formally recognized, it has been included in both the Biodiversity Impact Assessment and the Biodiversity Management Plan (BMP).</li> <li><b>Mammal Conservation:</b> The discussion addressed the need for continued collaboration with OkhotzooProm, particularly concerning the protection of key mammal species such as the argali and gazella. The Project Owner agreed to align closely with OkhotzooProm to finalize a comprehensive mitigation action plan focused on these species.</li> <li><b>Ongoing Collaboration:</b> Both parties acknowledged the importance of sustained communication and monitoring. As such, they agreed to hold regular meetings throughout the construction and post-construction phases of the Mirny project to ensure effective oversight and adaptive management.</li> </ol>

No.	Date	Location	Type of stakeholder	Stakeholder name	Status	Type of engagement	Main observations, recommendations and concerns expressed by the stakeholder
20	December 2025	Almaty, Kazakhstan	Institutions - Government - National government Authorities		Planned in December 2025	Official meeting with OkhotZooProm representatives	Meetings will be scheduled with OkhotZooProm to address previous concerns raised in January and follow up/discuss mitigation measures.
21	2026	Almaty, Kazakhstan	Civil Society Organisations- Non-Governmental Organisation	Institute of Botany of Kazakhstan and relevant scientific or other institutions working on Critical Habitats (CH) and Priority Biodiversity Species (PBF)	To be planned	Official meeting with Institute of Botany of Kazakhstan and relevant scientific or other institutions working on Critical Habitats (CH) and Priority Biodiversity Species (PBF) representatives	Aktas committed to organizing a dedicated meeting with leading experts from the Institute of Botany of Kazakhstan and relevant scientific or other institutions working on Critical Habitats (CH) and Priority Biodiversity Species (PBF) in order to clarify and refine the proposed mitigation strategies for protected tulips.

## 8.0 ENGAGEMENT PROGRAMME DURING THE PROJECT LIFECYCLE

A number of engagement activities will be performed throughout the Project lifecycle to ensure that stakeholders have a good understanding of the Project activities that will be carried out, of the impacts expected on the channels available to contact Aktas Energy LLP. Engagement will also represent an opportunity for stakeholders to raise comments and questions that the Project owner will take into consideration in the Project implementation.

Engagement activities will be generally performed in Kazakh language, which is widely spoken and understood in the Project area, and in Kazakh and Russian languages in Mirny Village. Written communication materials are planned to be prepared in Kazakh and Russian languages. Aktas Energy LLP will ensure that staff used for engagement activities speaks both Kazakh and Russian. Disclosure of information on the Project website will also include an English version.

All engagement activities performed will have to be registered using a register log and a form. A template is provided at the end of this report, as Appendix A.

The program provided below is to be considered indicative as changes to the activities and to the stakeholders involved may be made as the Project goes ahead, based on the outcomes of previous activities and the relationship established with the different stakeholder groups. Changes to the program should be defined and agreed between the Community Liaison Office (CLO), and management (the full description of the roles and responsibilities for the implementation of this plan is provided in section 10.0 of this document).

**Special Measures for accessibility, inclusivity and outreach for vulnerable groups:** A nominated Community Liaison Officer (CLO) should be appointed, who is readily accessible and schedules ongoing community engagement. Visual materials will be displayed in busy public locations. Focus groups and meetings with vulnerable community members will be conducted in a culturally sensitive manner. Where feasible, local civil society organizations (CSOs) and non-governmental organizations (NGOs) will be engaged to facilitate these sessions, leveraging their community trust and contextual expertise. To address language barriers, all engagement materials and communications will be provided in local languages (Kazakh and Russian). Additional languages may be incorporated based on the linguistic profile of migrant workers and other non-native groups involved during the construction phase.

To enhance accessibility and inclusivity, the following measures will be implemented for facilitating communication and described in the list of proposed actions. The measures will be tailored according to the identified need of the groups after the initial engagements and feedback. Anonymous feedback channels (e.g. online surveys, online voting) will be promoted yet given the rural characteristics of the local communities, culturally appropriate tools will be selected after the initial engagements and feedback of the CLO.

The Grievance Mechanism will be accessible during all engagement programme phases, following the modalities described under Section 9.0.

The list of activities below presents an indicative list and none of the activities are conducted yet, once the plan become operational, status of each activity (ongoing-planned- completed) will be updated-

Monitoring and evaluation of engagement effectiveness, including periodic reviews of participation rates, feedback quality, and responsiveness to stakeholder concerns, with adjustments made as needed to improve outreach. Details on monitoring activities are presented in section 11. Monitoring and Reporting.

### 8.1 Engagement during pre-construction

Pre-construction is the engagement until the start of the construction phase. At this stage of the Project the Scoping phase engagement activities, and the ESIA drafting phase engagement activities have been carried out already, therefore this phase includes activities planned for the draft ESIA consultation and disclosure engagement phase.

**Table 5: Proposed Stakeholder Engagement Program during pre-construction phase**

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
<b>Institutions- Government and National Authorities</b> <ul style="list-style-type: none"> <li>Ministry of National Economy of the Republic of Kazakhstan</li> <li>Ministry of Transport of the Republic of Kazakhstan</li> <li>Ministry of Agriculture of the Republic of Kazakhstan</li> <li>Ministry of Education of the Republic of Kazakhstan</li> <li>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</li> <li>Ministry of Labor and Social protection of population of the Republic of Kazakhstan</li> <li>Ministry of Industry and Construction of the Republic of Kazakhstan</li> <li>Ministry of Water Resources and Irrigation of the Republic of Kazakhstan</li> <li>Ministry of National Economy of the Republic of Kazakhstan</li> </ul>	Official Meeting	Quarterly Public Offices Notification: One week before, following a reminder a day before	Ensure regulatory compliance and approvals for Project activities Disclose project documentation: <ul style="list-style-type: none"> <li>ESIA (including the Environment and Social Management Plan (ESMP));</li> <li>Non-Technical Summary (NTS);</li> <li>SEP (this document);</li> <li>ESAP (Environmental and Social Action Plan)</li> </ul> Receive feedback and information	Project activities are conducted in compliance with national legal framework and approvals received on time Transparency is ensured for the Project activities and authorities are informed about the project documents Feedback is received on project documentation	Meeting Minutes and Meeting Logs Correspondence Records	Provide clarifications on inquiries Provide update on revisions and changes	<ul style="list-style-type: none"> <li>The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way at least 7 days before the meetings</li> <li>Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li> <li>Meetings will be organized in local languages (Kazakh Russian).</li> <li>Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>Online and close voting methods, surveys will be used to allow anonymous feedback</li> <li>Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li> <li>Information on the outcomes of the meeting will be shared</li> </ul>

							via the agreed appropriate channel.
<b>All (Academics, CSOs, Local communities, Vulnerable Groups)</b>	Disclosure of Project Documents via Aktas website	Website First disclosure foreseen for end 2025; further disclosures throughout Project cycle as needed	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms  Communicate feedback and grievance mechanism  Provide response to frequently asked questions  Ensure transparency of the process	Stakeholder are informed about the project  Stakeholders are provided with feedback and grievance channel  Inquiries are answered in a transparent and timely manner	Feedback forms and logged complaints/inquiries via website  Updates of the Website	Respond to inquiries and complaints  Update information	Multilingual disclosure and share of documents (in English, Kazakh and Russian)  Communication of the website via local channels:  <ul style="list-style-type: none"> <li>■ Notices provided to the District and Akimat offices, and circulated to Akims;</li> <li>■ Notice boards in affected community centres (halls, schools, libraries) and construction areas;</li> <li>■ TV, radio and local newspaper adverts will be used to communicate the website</li> <li>■ E-mails will be send to the stakeholder groups to inform about the project website. Information can be also shared via online communication channels.</li> </ul>
<b>Institutions-Government - Regional Level (Akimats)</b>  <ul style="list-style-type: none"> <li>■ Akimat of Jambyl Region, including all departments representatives</li> </ul> Institutions-Government-District level  <ul style="list-style-type: none"> <li>■ Akimat of Moiynkum District</li> <li>■ Maslikhat of Moiynkum District</li> </ul> Institutions-Government-Local level (rural district)  <ul style="list-style-type: none"> <li>■ Khantau Rural District Representative</li> <li>■ Kiyakty Akimat</li> </ul>	Official Meetings  (Local and Regional)	Quarterly Public Offices   Notification: One week before, following a reminder a day before	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms  Ensure planning and collaboration in mitigation measures  Receive feedback and information  Share job opportunities and recruitment procedure	Transparency is ensured for the Project activities and authorities are informed about the project documents  Feedback is received on project documentation  Collaboration and coordination are promoted for minimizing adverse impacts	Meeting Minutes and Meeting Logs	Provide clarifications on inquiries  Provide update on revisions and changes  Share schedules and plans	The hard copies of the documents will be available in the affected Akimats offices (multilingual-Kazakh-Russian- English).
<b>Institutions-Government-Local level</b>  <ul style="list-style-type: none"> <li>■ Representative/ Akim of Mirny Village</li> <li>■ Representative/ Akim of Ulken Village</li> </ul>	Official Meetings  (Local)	Monthly  In respective villages  Notification: One week	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms  Ensure planning and collaboration in mitigation measures	Transparency is ensured for the Project activities and authorities are informed about the project documents	Meeting Minutes and Meeting Logs	Provide clarifications on inquiries  Provide update on revisions and changes	The hard copies of the documents will be available to the Akims (multilingual- Kazakh- Russian-English)

<ul style="list-style-type: none"> <li>Representative / Akim of Shyganak Village (near Ulken Kamkaly lake)</li> <li>Representative / Akim of Kenes Village</li> </ul>		before, following a reminder a day before	<p>Receive feedback and information</p> <p>Introduce project staff and share grievance processes</p> <p>Share job opportunities and recruitment procedure</p>	<p>Feedback is received on project documentation</p> <p>Collaboration and coordination are promoted for mitigating adverse impacts</p> <p>Grievance mechanism is communicated</p>		Share schedules and plans	Project related posters and brochures will be shared and are designed multilingual.
<b>Public Companies/Entities</b>  Mirny Village: <ul style="list-style-type: none"> <li>Representatives from the Mirny Community Hall</li> <li>Representatives from the Mirny Post Office</li> <li>Representatives from the Mirny School</li> <li>Representatives from the Mirny Medical Center</li> </ul> Kiyakty Village: <ul style="list-style-type: none"> <li>Representatives from the Kiyakty Railway Station</li> <li>Representatives from Social Infrastructure (Health or Educational) in Kiyakty</li> <li><b>Village elders</b></li> </ul>	Official Meetings (Public Consultation Meeting as per the National Law)	Every two months  Mirny and Kiyakty Village  Notification: Two weeks before, following a reminder a day before	<p>Ensure regulatory compliance with national stakeholder requirements</p> <p>Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms</p> <p>Receive feedback and information</p> <p>Introduce project staff and share grievance processes</p> <p>Share job opportunities and recruitment procedure</p>	<p>Feedback is received on project documentation</p> <p>Collaboration and coordination are promoted for mitigating adverse impacts</p> <p>Grievance mechanism is communicated</p>	Meeting minutes and meeting logs		Project related posters and brochures will be shared and are designed multilingual (Kazakh-Russian).
<b>Local communities</b>  <b>Residents, in the following villages/towns within the Project area of influence:</b> <ul style="list-style-type: none"> <li><b>Mirny community</b></li> <li><b>Kiyakty community</b></li> <li><b>Shyganak community</b></li> <li><b>Sholpan community</b></li> <li><b>Ulken community</b></li> <li><b>Kenes community</b></li> <li><b>Khantau community</b></li> <li><b>Qatari group</b></li> </ul>	Public Meetings	Every two months  In Villages and Towns (Mirny, Kiyakty, Shyganak, Sholpan, Ulken, Kenes, Khantau, Qatari)  Notification: Two weeks before, following a reminder a day before	<p>Provide information on Project and Project activities</p> <p>Receive feedback and information</p> <p>Introduce project staff (CLO) and share grievance processes</p> <p>Share job opportunities and recruitment procedure</p>	<p>Feedback is received on project documentation</p> <p>Grievance mechanism is communicated</p>	Meeting minutes and meeting logs	<p>Provide clarifications on inquiries</p> <p>Provide feedback and response on complaints and concerns</p>	<ul style="list-style-type: none"> <li>The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way at least 7 days before the meetings</li> <li>Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li> <li>Images or diagrams with clear and accessible content with descriptions and</li> </ul>



							<p>alternative text will be provided</p> <ul style="list-style-type: none"> <li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li> <li>■ Meetings will be organized in local languages (Kazakh-Russian).</li> </ul>
<b>Local Communities</b>	Visual Materials (Brochures and Posters)	<p>Villages and Districts Information Boards</p> <p>Throughout Project cycle</p>	Provide information on Project and grievance mechanism	Awareness is raised on grievance mechanism	List of locations where posters are hanged and brochures are left	Provide feedback and response on complaints and concerns	<p>Multilingual visual material will be provided (English, Kazakh and Russian)</p> <ul style="list-style-type: none"> <li>■ Posters and brochures will be designed with images and easily understandable language (multilanguage)</li> <li>■ Barcodes and whatsapp groups will be presented for verbal complaints and concerns</li> <li>■ Posters and brochures will be distributed to CSOs and vulnerable groups representatives</li> <li>■ Meetings will be organized in local languages (Kazakh-Russian).</li> </ul>
<b>Vulnerable Groups (as per definition under Section 6.2)</b>	Focus Group Meetings	<p>Villages and Districts</p> <p>Notification: Two weeks before, following a reminder a day before</p>	Provide information on Project and grievance mechanism	Awareness is raised on grievance mechanism	Meeting Minutes and meeting logs		<ul style="list-style-type: none"> <li>■ Meeting date and time will consider cultural practices and decided with representatives to ensure participation</li> <li>■ Gender sensitive measures will be considered in selecting location and time</li> <li>■ Meetings will be organized in local languages (Kazakh-Russian).</li> </ul>
<b>Media</b> <ul style="list-style-type: none"> <li>■ Local TV</li> <li>■ Local media</li> </ul>	Visual Materials (Brochures)	Media's communication means	Provide information on Project and grievance mechanism	Awareness is raised on grievance mechanism	List of media communication means where information are shared		Multilingual news and visual material will be provided (English, Kazakh and Russian)

<ul style="list-style-type: none"> <li>Local influential bloggers, owning news channels on telegram and Instagram</li> </ul>	and Posters)	Throughout Project cycle					<ul style="list-style-type: none"> <li>Visual material will be designed with images and easily understandable language (multilanguage)</li> <li>Barcodes and whatsapp groups will be presented for verbal complaints and concerns</li> </ul>
<b>Civil Society Organisations - Non Governmental Organisation</b> <ul style="list-style-type: none"> <li>Biodiversity related issues</li> </ul>	Focus Group Meetings	Villages and Districts  Notification: Two weeks before, following a reminder a day before	Provide information on Project and grievance mechanism	Feedback is received on Project's activities  Collaboration and coordination are promoted for minimizing adverse impacts  Grievance mechanism is communicated	Meeting Minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns	<ul style="list-style-type: none"> <li>The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way</li> <li>The meetings will be publicized through social media, NGOs networks and other appropriate means of communication.</li> <li>Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>Meetings will be organized in local languages (Kazakh Russian) and English where needed.</li> <li>Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>Online and close voting methods, surveys will be used to allow anonymous feedback</li> <li>Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li> </ul>

## 8.2 Engagement during the construction phase

Stakeholder engagement activities during the construction phase will build on the outcomes and lessons learned of activities performed during previous phases. The following program is therefore intended as indicative and will be further updated.

**Table 6: Proposed Stakeholder Engagement Program during the construction phase**

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
<b>All (Academics, CSOs, Local communities, Vulnerable Groups)</b>	Disclosure of Project Documents via Total website	Website Throughout Project cycle	<p>Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms and updates on Project activities</p> <p>Disclose information on project E&amp;S performance</p> <p>Communicate feedback and grievance mechanism</p> <p>Provide response to frequently asked questions</p> <p>Ensure transparency of the process</p>	<p>Stakeholder are informed about the project E&amp;S performance</p> <p>Stakeholders are provided with feedback and grievance channel</p> <p>Inquiries are answered and updates and revisions are shared in a transparent and timely manner</p>	<p>Feedback forms and logged complaints/inquiries via website</p> <p>Updates of the Website</p>	<p>Respond to inquiries and complaints</p> <p>Update information</p>	<p>Multilingual disclosure and sharing of documents (in English, Kazakh and Russian)</p> <p>Communication of the website will be made via local channels:</p> <ul style="list-style-type: none"> <li>■ Notices provided to the District and Akimat offices, and circulated to Akims;</li> <li>■ Notice boards in affected community centres (halls, schools, libraries) and construction areas;</li> <li>■ TV, radio and local newspaper adverts will be used to communicate the website</li> <li>■ E-mails will be send to the stakeholder groups to inform about the project website. Information can be also shared via online communication channels.</li> </ul>
<b>Institutions-Government-Local level</b> <ul style="list-style-type: none"> <li>■ Representative/ Akim of Mirny Village</li> <li>■ Representative/ Akim of Ulken Village</li> <li>■ Representative / Akim of Shyganak Village (near Ulken Kamkaly lake)</li> <li>■ Representative / Akim of Kenes Village</li> </ul>	One to One meeting (Local)	<p>Quarterly</p> <p>Location: Public offices</p> <p>Notification: Two weeks before</p>	<p>Present updated Project information and schedule of construction activities.</p> <p>Share information on Project E&amp;S performance and periodic reports on progress of mitigation measures</p> <p>Introduction presentation of the Project staff during construction.</p> <p>Seek feedback on issues previously raised in the engagement process (e.g. water, environmental pollution) and any other construction related activities that may affect the communities' activities</p> <p>Discuss and record potential mitigation measures to minimise adverse impact and remedy if required</p>	<p>Feedback is received on project activities</p> <p>Collaboration and coordination are promoted for mitigating adverse impacts</p> <p>Grievance mechanism is communicated</p>	<p>Meeting Minutes and Meeting Logs</p>	<p>Provide clarifications on inquiries</p> <p>Provide update on revisions and changes</p> <p>Share schedules and plans</p>	<ul style="list-style-type: none"> <li>■ The meetings will be organized in an easily accessible location. Transfers will be facilitated.</li> <li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>■ Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li> <li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li> </ul>

							<ul style="list-style-type: none"> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Meetings will be organized in local languages.</li> <li>■ Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li> <li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li> </ul>
<b>Public Companies/Entities</b>  Mirny Village: <ul style="list-style-type: none"> <li>■ Representatives from the Mirny Community Hall</li> <li>■ Representatives from the Mirny Post Office</li> <li>■ Representatives from the Mirny School</li> <li>■ Representatives from the Mirny Medical Center</li> </ul> Kiyakty Village: <ul style="list-style-type: none"> <li>■ Representatives from the Kiyakty Railway Station</li> <li>■ Representatives from Social Infrastructure (Health or Educational) in Kiyakty</li> </ul>	Official Meetings (Public Consultation Meeting as per the National Law)	Monthly Location: Villages Notification: Two weeks before, following a reminder a day before	Present updated Project information and schedule of construction activities.  Introduction presentation of the Project staff during construction.  Share information on Project E&S performance and periodic reports on progress of mitigation measures  Seek feedback on issues previously raised in the engagement process (e.g. water, environmental pollution) and any other construction related activities that may affect the communities' activities  Discuss and record potential mitigation measures to minimise adverse impact and provide remedy if required  Seek feedback on community access to cultural heritage aligning with Cultural Heritage Plan	Ongoing feedback is received on Project activities and community perception  Collaboration and coordination are promoted for mitigating adverse impacts  Grievance mechanism is communicated	Meeting minutes and meeting logs	Provide clarifications on inquiries  Provide update on revisions and changes  Organize tailored engagement models - frequency if specific issues are raised.	<ul style="list-style-type: none"> <li>■ The meetings will be organized in an easily accessible location. Transfers will be facilitated for remote communities.</li> <li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>■ Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li> <li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Meetings will be organized in local languages.</li> <li>■ Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li> <li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li> </ul>
<b>Local communities</b>  Residents, in the following villages/towns within the Project area of influence:	Public Meetings	Monthly Locations:	Present updates on construction schedule will also be uploaded on the Project websites	Ongoing feedback is received on Project activities and community perception	Meeting minutes and meeting logs	Provide clarifications on inquiries	<ul style="list-style-type: none"> <li>■ The meetings will be organised in an easily accessible locations and information on meetings will be given via online</li> </ul>

<ul style="list-style-type: none"> <li>■ Mirny community</li> <li>■ Kiyakty community</li> <li>■ Shyganak community</li> <li>■ Sholpan community</li> <li>■ Ulken community</li> <li>■ Kenes community</li> <li>■ Khantau community</li> <li>■ Qatari group</li> </ul>		<p>In Villages and Towns (Mirny, Kiyakty, Shyganak, Sholpan, Ulken, Kenes, Khantau, Qatari)</p> <p>Notification: One week before following a reminder a day before</p>	<p>Share information on Project E&amp;S performance and periodic reports on progress of mitigation measures</p> <p>Present project posters, brochures, website to raise awareness</p> <p>Introduce hotline and grievance channel for issues connected to gender-based violence</p> <p>Seek feedback on community access to cultural heritage and other mitigation measures associated with Project activities</p>	Grievance mechanism is communicated, and update is provided on concerns and complaints		<p>Provide feedback and response on complaints and concerns</p> <p>Organize tailored engagement models - frequency if specific issues are raised.</p>	<p>communication groups, information boards, and website in multilingual way at least 7 days before the meetings</p> <ul style="list-style-type: none"> <li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>■ Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li> <li>■ Meetings will be organized in local languages (Kazakh Russian).</li> <li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li> <li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>■ Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li> <li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li> </ul>
<b>Local Communities</b>	<p>Visual Materials (Information Boards, Brochures and Posters)</p>	<p>Villages and Districts Information Boards</p> <p>Throughout Project cycle</p>	<p>Provide information on Project, Project activities, schedule, plan and grievance mechanism</p> <p>Share information on Project E&amp;S performance and periodic reports on progress of mitigation measures</p>	Awareness is raised on Project activities, schedule and grievance mechanism	List of locations where posters are hanged and brochures are left	<p>Provide feedback and response on complaints and concerns</p>	<p>Multilingual visual material will be provided (English, Kazakh and Russian)</p> <ul style="list-style-type: none"> <li>■ Posters and brochures will be designed with images and easily understandable language (multilanguage)</li> <li>■ Barcodes and whatsapp groups will be presented for verbal complaints and concerns</li> <li>■ Posters and brochures will be distributed to CSOs and vulnerable groups representatives.</li> </ul>

<b>Suppliers</b>	Training and Official Meetings	Throughout Project cycle aligned with procurement process	Provide information on Project activities, mitigation measures and international and company standards to follow on operations  Provide information on grievance mechanisms and ensure communication protocol and collaboration grievances associated with the Project	Supplier are equipped with necessary knowledge on Project activities and required standards to follow	Training and meeting records	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns  Organize additional awareness activities/trainings if needed	<ul style="list-style-type: none"> <li>■ In case of local suppliers meetings will be organized in local languages (Kazakh-Russian)</li> <li>■ Information and training materials will be shared upon completion of meetings/trainings</li> </ul>
<b>Workers</b>	Training	Throughout Project cycle aligned with recruitment process	Provide information on Project, workplace and workers code of conduct, international and company standards for operations.  Provide information on grievance mechanism (including non-retaliation and confidentiality measures)  Provide updates and information if any complaints are connected to workers from communities  Seek feedback from workers on workplace conditions and community engagements	Awareness is raised on grievance mechanism  Workers are informed on rules and standards to follow in their engagements with communities and within workplace	Training records	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns  Organize additional awareness activities/trainings if needed	<ul style="list-style-type: none"> <li>■ Training with workers will be organized in an easily understandable way, in case of recruitment of migrant workers, translation will be provided in their native language.</li> </ul>
<b>Vulnerable Groups (as per definition under Section 6.2)</b>	Focus Group Meetings	Villages and Districts	Provide information on Project and grievance mechanism  Seek feedback on issues specific to vulnerable groups and their sensitivities	Information is provided on Project, Project associated activities and grievance mechanisms  Feedback is received on issues associated with Project and vulnerable groups.	Meeting Minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns	<ul style="list-style-type: none"> <li>■ Meeting date and time will consider cultural practices and decided with representatives to ensure participation</li> <li>■ Gender sensitive measures will be considered in selecting location and time</li> <li>■ Meetings will be organized in local languages.</li> </ul>
<b>Media</b> <ul style="list-style-type: none"> <li>■ Local TV</li> <li>■ Local media</li> <li>■ Local influential bloggers, owning news channels on telegram and Instagram</li> </ul>	Visual Materials (Brochures and Posters)	Media's communication means  Throughout Project cycle	Provide information on Project and grievance mechanism	Awareness is raised on grievance mechanism	List of media communication means where information are shared		Multilingual news and visual material will be provided (English, Kazakh and Russian) <ul style="list-style-type: none"> <li>■ Visual material will be designed with images and easily understandable language (multilanguage)</li> <li>■ Barcodes and whatsapp groups will be presented for verbal complaints and concerns</li> </ul>
<b>Civil Society Organisations - Non Governmental Organisation</b> <ul style="list-style-type: none"> <li>■ Biodiversity related issues</li> </ul>	Focus Group Meetings	Villages and Districts  Notification: Two weeks before, following a	Provide information on Project and grievance mechanism	Feedback is received on Project's activities  Collaboration and coordination are promoted for minimizing adverse impacts	Meeting Minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns	<ul style="list-style-type: none"> <li>■ The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way</li> </ul>

		reminder a day before		Grievance mechanism is communicated			<ul style="list-style-type: none"> <li>■ The meetings will be publicized through social media, NGOs networks and other appropriate means of communication.</li> <li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>■ Meetings will be organized in local languages (Kazakh Russian) and English where needed.</li> <li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li> <li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li> </ul> <p>Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</p>
--	--	-----------------------	--	-------------------------------------	--	--	---

### 8.3 Engagement during the operation phase

The responsibility for performing engagement activities during the operation phase will be under Aktas Energy LLP and they will be responsible for the engagement during this phase of the Project. The following program is therefore intended as indicative and will be further updated. Operation is designed to last for at least 25 years. Activities will be updated in further phases of Project and will reflect results of the previous engagement carried out in pre and during construction.

**Table 7: Proposed Stakeholder Engagement Program during the Project operation phase**

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
<b>Institutions-Government-Local level</b> <ul style="list-style-type: none"> <li>■ Representative/ Akim of Mirny Village</li> <li>■ Representative/ Akim of Ulken Village</li> <li>■ Representative / Akim of Shyganak Village (near Ulken Kamkaly lake)</li> <li>■ Representative / Akim of Kenes Village</li> </ul>	Official Correspondence	Bi-annually	Receive updated information on concerns and inquiries associated with operations	Feedback is received on ongoing concerns and complaints	Correspondence Records	Provide clarifications on inquiries	N/A
<b>Residents, business owners and land users in the following villages/towns within the Project area of influence:</b> <ul style="list-style-type: none"> <li>■ Mirny community</li> <li>■ Kiyakty community</li> </ul>	Public Meetings	Annually	Receive updated information on concerns and inquiries associated with operations	Feedback is received on ongoing concerns and complaints	Meeting records	Provide clarifications on inquiries  Follow up concerns/complaints with relevant authorities- refer where needed	<ul style="list-style-type: none"> <li>■ The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way at least 7 days before the meetings</li> <li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li> <li>■ Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li> </ul>



							<ul style="list-style-type: none"><li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li><li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li><li>■ Meetings will be organized in local languages (Kazakh Russian).</li><li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li><li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li><li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li><li>■ Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li><li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li></ul>
<b>Vulnerable Groups (as per definition under Section 6.2)</b>	Focus Groups	Annually	Monitor impacts and perceptions on the project	Feedback is received on ongoing concerns and complaints	Meeting records	Provide clarifications on inquiries  Refer to grant opportunities or other services where needed	<ul style="list-style-type: none"><li>■ The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way at least 7 days before the meetings</li><li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li><li>■ Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</li><li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li><li>■ Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</li><li>■ Meetings will be organized in local languages (Kazakh Russian).</li></ul>

							<ul style="list-style-type: none"><li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li><li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li><li>■ Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li><li>■ Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</li><li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li></ul>
<b>Civil Society Organisations - Non Governmental Organisation</b> <ul style="list-style-type: none"><li>■ Biodiversity related issues</li></ul>	Focus Group Meetings	Villages and Districts  Notification: Two weeks before, following a reminder a day before	Provide information on Project and grievance mechanism	Feedback is received on Project's activities  Collaboration and coordination are promoted for minimizing adverse impacts  Grievance mechanism is communicated	Meeting Minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns	<ul style="list-style-type: none"><li>■ The meetings will be organised in an easily accessible locations and information on meetings will be given via online communication groups, information boards, and website in multilingual way</li><li>■ The meetings will be publicized through social media, NGOs networks and other appropriate means of communication.</li><li>■ Audio and video with synchronised captions, transcripts and signposting will be used where needed</li><li>■ Meetings will be organized in local languages (Kazakh Russian) and English where needed.</li><li>■ Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</li><li>■ Online and close voting methods, surveys will be used to allow anonymous feedback</li><li>■ Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</li></ul>

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

During the ESIA drafting phase, PAPs were identified. Therefore, engagement activities for the land acquisition process must be conducted before the start of construction and during the implementation of the framework and plan on land acquisition, resettlement, restoration and livelihood. Aktas will implement a structured and inclusive stakeholder engagement process to ensure Informed Consultation and Participation (ICP) in accordance with IFC PS5/EBRD PR5, which is described in the Stakeholder Engagement Plan (SEP). The objective is to ensure that Project-Affected Persons (PAPs), including vulnerable groups such as informal herders, are meaningfully consulted, informed in a timely and accessible manner, and provided with opportunities to influence decisions that affect their land, assets, and livelihoods.

The following measures will be implemented to uphold ICP throughout the land acquisition and livelihood restoration process:

- Public disclosure of the Livelihood Restoration Plan (LRP) and the Guide to Land Acquisition and Compensation (GLAC) will be conducted through public meetings, information desks at local Akimats, and direct outreach to PAPs. Notifications will be issued at least two weeks in advance via local information boards, online channels, and one-to-one phone calls.
- Public meetings and focus group discussions will be held in local languages (Kazakh and Russian), using visual aids and accessible materials. Meetings will be held in easily accessible locations, with transport support provided for PAPs from remote areas. Remote participation options will be offered where needed.
- One-on-one consultations will be conducted with affected households and individuals, particularly those with specific impacts such as the relocation of water wells or seasonal grazing structures. Feedback from these engagements will be documented and used to inform the design and implementation of mitigation measures.
- A multi-tiered grievance redress mechanism (GRM) will be maintained and publicized throughout the LRP implementation. PAPs will be able to submit grievances through local Akimats (recommended) or directly to the Project's Community Liaison Officers (CLOs). All grievances will be logged, tracked, and resolved in a timely and transparent manner.
- Monitoring of the effectiveness of stakeholder engagement and grievance procedures will be conducted through surveys and interviews. Feedback will be used to improve the engagement process and ensure that it remains responsive to the needs and concerns of PAPs.

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

- **Committee Meetings.** Community-based committee allow carrying well-formed and well-organized SE activities for comprehensive implementation of the LRP. The committee shall be headed by local district akims or selected representative amongst affected communities, and of the affected community, including women, youth, herders, the disabled, and vulnerable groups as identified in this LARF. Such committee can be organized through local WhatsApp groups, which was identified as main communication tool during social surveys conducted during the Social Baseline Study.
- **Community Meetings.** General community meetings will be held during development and implementation of LRP to provide a necessary level of transparency and provide a means to inform the entire community of decisions reached with the committee and verify agreement. Such meetings can be organized via local WhatsApp groups and held in local akimats.

- **Focus Groups.** Focus groups are a valuable participatory tool that enable inclusive and in-depth discussions among specific community segments, such as women, agricultural landowners, and herders. By organizing separate meetings for these groups, focus groups help overcome barriers to participation and ensure that diverse perspectives, concerns, and expectations are heard. They provide a platform to explore detailed issues, such as the design of wind power plants (WPPs) and their impact on pasturelands, and foster collaborative problem-solving and consensus-building. Participants often find value in sharing experiences, listening to others, and co-creating solutions. Key discussion topics include baseline surveys on land use, natural resource dependency, migration patterns, agricultural calendars, and community safety. Additionally, focus groups address entitlements, including compensation preferences, equitable distribution, and livelihood restoration. Discussions also extend to host community impacts, such as infrastructure needs, power dynamics, and safety considerations.

The table below presents the indicative activities aligned with the Land Acquisition and Resettlement Framework (LARF) and should be updated based on the implementation stages and Plan structure. All activities are tailored for PAPs by the land acquisition process. The engagement methods and tools are described in LARF. Inclusivity and accessibility measures as well as notification periods are defined for ensuring ICP.

**Table 8: Proposed Stakeholder Engagement Program during the land acquisition process and implementation of LARF-LRP**

LARF- LRP Stage	Method	Location and Timing	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
Disclosure of LRP and Guide to Land Acquisition and Compensation (GLAC)	Community Meetings	Villages and Districts  Notification: Two weeks before the meetings via information boards, online communication channels, were available through one-to-one phone calls	Provide detailed information on Livelihood and Restoration Plan and process  Introduce initial stages and activities of the process including socio-economic survey, census and asset inventory  Present grievance mechanism and procedure  Introduce CLO and Land Acquisition Team  Receive feedback on livelihood restoration process, expected measures, potential alternative grazing areas and answer inquiries  Share schedule and plan of the land acquisition process	Awareness is raised on grievance mechanism and information provided on the procedure of LARF and GLAC  Affected parties, in particular vulnerable groups (herders), are consulted and provided feedback on the process and expected restoration measures	Meeting Minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns  Provide update on revisions and changes  Incorporate changes and improvements as per the comments of the PAPs  Share schedules and plans	<ul style="list-style-type: none"> <li>The meetings will be organized in an easily accessible location. Transfers will be facilitated for remote communities.</li> <li>Where possible remote online participation is facilitated if affected people cannot join onsite meetings</li> <li>Online and close voting methods, surveys will be used to allow anonymous feedback</li> <li>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>Meetings will be organized in local languages.</li> </ul>
Disclosure of Documentation of LRP	Information Desks in Local Akimats	Throughout LRP	Share documentation on LRP, GLAC, entitlement information, livelihood packages, schedules and implementation. This information will be shared via information desks throughout the project and updated according to the stage of the LRP implementation.	Affected parties accessed written information on the process	Visual materials created for information desks including brochures, posters	Provide update on revisions and changes  Sharing schedules and plans	<ul style="list-style-type: none"> <li>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>All documents will be provided in local languages (Kazakh- Russian)</li> </ul>
Communication on Socio-economic survey, census and asset inventory and cut off	Committee Meeting  Focus Groups (for participants in remote areas)	Villages and Districts  Notification: Two weeks before the meetings via information boards, online communication channels, were available	Share information on the critical stages of the LRP and procedures and processes.  Seek feedback from PAPs on process and outcomes	Affected parties, in particular vulnerable groups (herders), are consulted and provided feedback on implemented actions	Meeting minutes and meeting logs	Provide clarifications on inquiries  Provide feedback and response on complaints and concerns  Incorporate changes and improvements as per the comments of the PAPs  Provide update on revisions and changes	<ul style="list-style-type: none"> <li>The meetings will be organized in an easily accessible location. Transfers will be facilitated for remote communities</li> <li>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</li> <li>With the consent of PAPs, third parties such as legal representatives and CSOs</li> </ul>

		through one-to-one phone calls				Share schedules and plans	<p>can be also invited to the meetings</p> <ul style="list-style-type: none"> <li>■ Online and close voting methods, surveys will be used to allow anonymous feedback and consultation</li> <li>■ Information on the outcomes of the meeting will be shared via appropriate channel agreed by the Committee (e.g. online communication channel, social media channel)</li> <li>■ All communication will be conducted in local languages (Kazakh- Russian)</li> </ul>
Asset Valuation and Compensation	<p>Committee Meeting</p> <p>Or depending on the number of entitled PAPs one to one meetings</p>	<p>Based on LRP Schedule</p> <p>Villages and Districts</p> <p>Notification: Two weeks before the meetings via information boards, online communication channels, were available through one-to-one phone calls</p>	<p>Share information on the results of valuation process</p> <p>Negotiate agreements and timelines</p> <p>Inform PAPs on potential appeal and referral processes</p>	Affected parties, in particular vulnerable groups (herders), are consulted and provided feedback on implemented actions	Meeting Minutes and meeting logs	<p>Provide clarifications on inquiries</p> <p>Incorporate changes and improvements as per the comments of the PAPs</p> <p>Share payment and restoration schedules</p>	<ul style="list-style-type: none"> <li>■ All documents will be provided in local languages (Kazakh- Russian)</li> <li>■ Legal representatives (e.g. lawyers) if requested will participate to the negotiations.</li> <li>■ If PAPs has mobility restrictions, home visits or transfers will be facilitated.</li> </ul>
Monitoring	<p>Surveys</p> <p>Interviews</p>	Throughout the LRP	Monitor effectiveness of the stakeholder engagement activities and grievance procedure. Monitoring of effectiveness of the SEP will be incorporated to the overall Monitoring framework of LARF and LRP.	Affected parties, in particular vulnerable groups (herders), are consulted on the effectiveness of consultation process and grievance mechanisms	<p>Survey results</p> <p>Interview logs</p>	Improvements will be made in the process according to the feedback	<ul style="list-style-type: none"> <li>■ All communication will be conducted in local languages (Kazakh- Russian)</li> </ul>

## 9.0 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. 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 main goals of the GM are to ensure the free submission and timely redress of grievances and concerns submitted by Project affected persons, as well as to resolve grievances at the Project level. 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 establishment of this Grievance Mechanism (GM) to make sure that the GM is operational to effectively handle environmental and social concerns of Project affected persons. The GM is presented during all public consultations and published online.

The GM serves as an umbrella mechanism designed to address all types of complaints and concerns. These include issues raised by communities connected to Project activities, matters related to land acquisition, resettlement and livelihood plans, as well as workers' rights.

Given the diverse nature of potential complaints, the Complaint Coordination Protocol establishes a clear referral process to ensure that each issue is directed at the appropriate channel for resolution. Depending on the number of affected parties and the complexity of the issues, the Project may implement dedicated channels or establish separate procedures tailored to specific needs.

**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, resettlement and livelihood plans.

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 including but not limited to:

- The Project or Project activities that create or potentially create adverse impacts on the environment or human rights and livelihoods of the communities;
- The Project or project activities that failed to meet the local laws and international standards;
- The Project or project activities associated with land acquisition, implementation of resettlement and livelihood restoration framework and plan (including but not limited to complaints in relation to land registration issue, disagreement on inventory, disagreement on compensation rates, disagreement on resettlement package, disagreement on plot allocation at resettlement site and defect in resettlement house (if applicable); damage to crops and livestock during works or surveys; allegations of gender based violence and/or harassment associated with the land acquisition and compensation process.);
- The Project and project activities associated with workplace and accommodation conditions;
- And feedback needs to be provided on any aspect or issues that may arise;
- Project activities carried out by the contractors and their employees potentially causing adverse impact on the environment or human rights and livelihoods of the communities;
- Grievances raised by the contractor in relation to the Project activities; and
- Commercial or contractual disputes related to Project activities.



The scope of the grievance mechanisms does not encompass complaints related to the activities of contractors and their employees associated with the project, nor grievances raised by contractors themselves in relation to the project. Commercial or contractual disputes should be addressed directly to the client through appropriate channels.

However, complaints concerning labour-related issues involving workers employed in the site and contracted via labour or employment agencies—such as violations of workers’ rights, occupational health and safety, or discriminatory practices—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 issues—such as allegations of forced labour, child labour, harassment, or severe safety breaches and environmental pollution—within 48 hours of becoming aware of the incident.

**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:

- **Workforce-related complaints:** Complaints exclusively pertaining to worker concerns or dissatisfaction related to construction site, accommodation facilities and working conditions will be managed by designated personnel from the Human Resources Department. (Figure 5: Grievance Management Process for Workers and Community Related Complaints)
- **Community related complaints:** Complaints involving local community issues shall fall under the responsibility of the appointed Community Liaison Officer (Figure 5: Grievance Management Process for Workers and Community Related Complaints), including land acquisition and resettlement grievances from PAPs. (Figure 6: Grievance Management Process for LRP and Land related Conflicts).
- **Cross-cutting issues:** Complaints that involve both workforce and community aspects – such as incidents occurring outside the construction side but involving employees and workers- will be addressed collaboratively by Human Resources and the Community Liaison Officer to ensure a coordinated and comprehensive response.

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

**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. Additionally following principles are incorporated:

- **Accessibility:** The mechanism must be accessible to all PAPs, including those with limited literacy, language barriers or mobility concerns. Measures may include translation of materials into local languages, development of pictograms, community outreach and awareness sessions and use of digital platforms that are user friendly and mobile accessible.
- **Safeguarding (Appropriate Protection):** The land acquisition process may expose individuals to risk of retaliation or coercion, particularly those unwilling to vacate land or engage in negotiations. The grievance mechanism should include referral pathways to protection services and where feasible offer confidential reporting channels for safeguarding protocols. Similar workers may also fear retaliation as a result of complaints; therefore grievance procedure ensure that workers will not be retaliated by communicating this information through trainings and information boards and allowing recourse to Totals complaint channel if such retaliation occurs.

- **Transparency and Accountability:** All procedures, timelines and potential outcomes should be clearly communicated to PAPs. If a grievance outcome has implications for other PAPs, relevant information should be shared with all affected parties in a timely and appropriate manner.
- **Cultural Appropriateness:** The mechanism should be designed to take into account culturally appropriate ways of handling community concerns.
- **Proportionality:** The mechanism should be scaled to risks and adverse impact on affected communities.

**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. Under the proposed Project level grievance mechanism, affected households may appeal any decision, practice or activity connected with the resolution of a grievance. PAPs will be made aware of the procedures they can follow to seek redress, including, if necessary, resort to administrative or judicial procedures as well as Lenders' grievance mechanisms. 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 consultation meetings, FGDs, and KIs as well as published on the Project's website. Human Resources Department will be responsible in disseminating GM to workers. The grievance management process is presented in Figure 6.

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 accommodation locations.
- QR codes shared on the Project website and in the local communities via advertisement and newspaper.

**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- including but not limited to forced labor, child labor, physical or psychological abuse and harassment, environmental degradation or pollution with potential serious impact on community will be prioritized within 48 hours of receipt. 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 is eligible including existing confidentiality and safeguarding measures for sensitive cases. If it is decided that grievance is not valid or doesn't fall under the company's jurisdiction, the person responsible for the grievance resolution will notify the complainant. For other types of complaints, it will be acknowledged within 7 days of grievance reception.

**Confidentiality:** The Grievance Officer will ensure confidentiality of the complainant from the lodging of a grievance onwards. Only those directly involved in the examination process will be provided with the grievance's details. Sensitive information will only be disclosed upon users' informed consent. In case of any emergency, the person who is on the site (employee of the company or contractor) should call the person in charge for GM.

**Anonymity:** The Grievance Officer will inform the complainant that the grievance can also be lodged anonymously should the complainant prefer it. All anonymous grievances will be documented as stakeholder feedback and concerns. 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 utilizing the grievance mechanism. The GM should incorporate good practices on non-retaliation such as intent to prevent harm, participation and informed consent and promoting peaceful resolution. Methods such as risk and vulnerability assessment at the initial stage of the complaint processing can be implemented to customize necessary measures depending on the complainants needs and sensitivities.<sup>4</sup>

**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. The complainant will be informed on the progress of implemented corrective actions. If no further attention is required, then the E&S manager can close the grievance and record this in the Grievance Register log.

**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. In the absence of specific confidentiality requirements, the outcomes of complaint assessments – excluding any personally identifiable information of complaints shall be communicated through appropriate stakeholder engagement channels. This includes dissemination via workplace notice boards, community forums and other relevant platforms within both the organizational and local community settings.

---

<sup>4</sup> Compliance Advisor Obdusman (CAO), [Approach to Responding to Concerns of Threats and Incidents of Reprisals in CAO Operations](#), 2021.

Figure 6: Grievance Management Process for Workers and Community Related Complaints

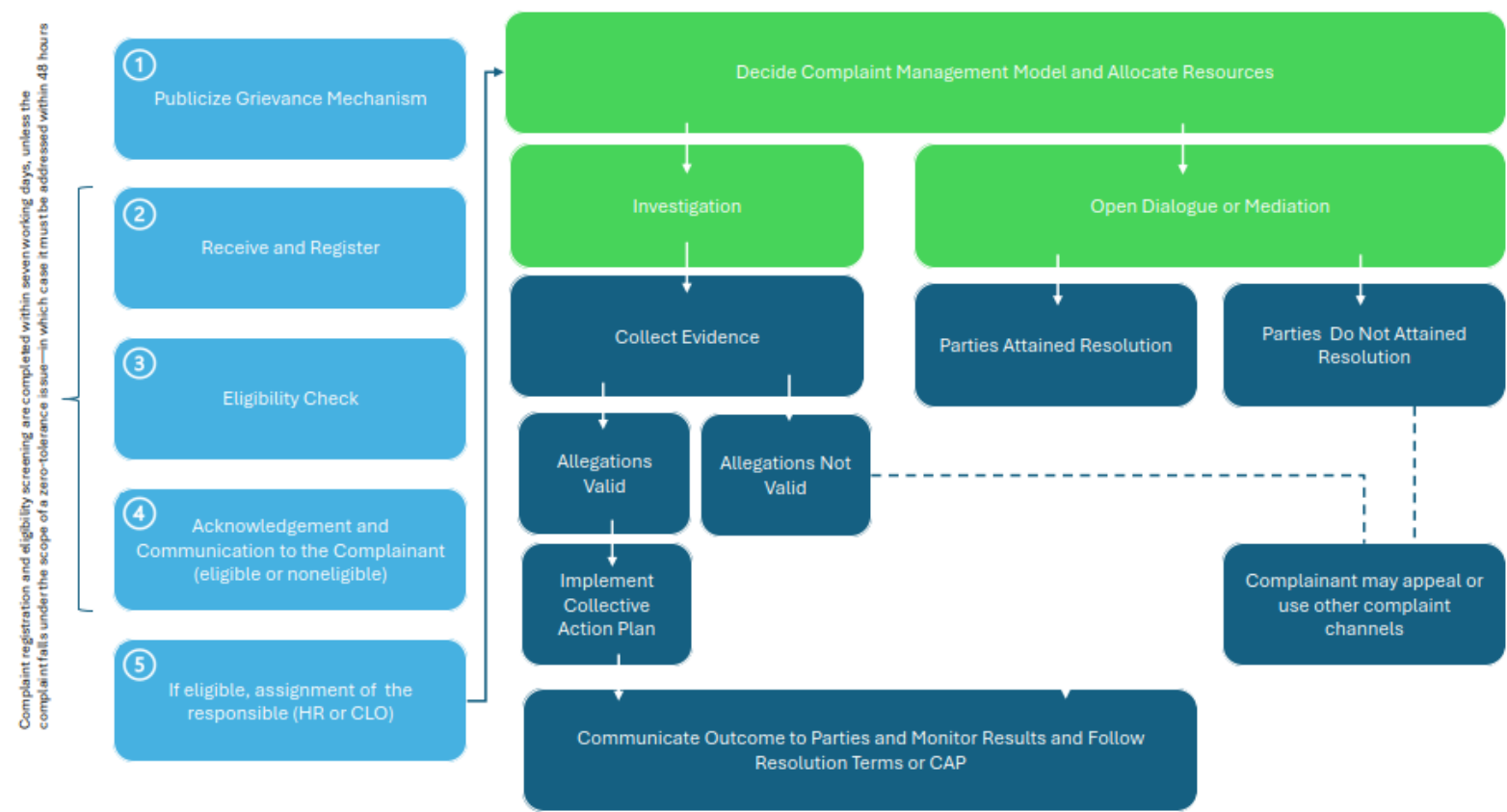
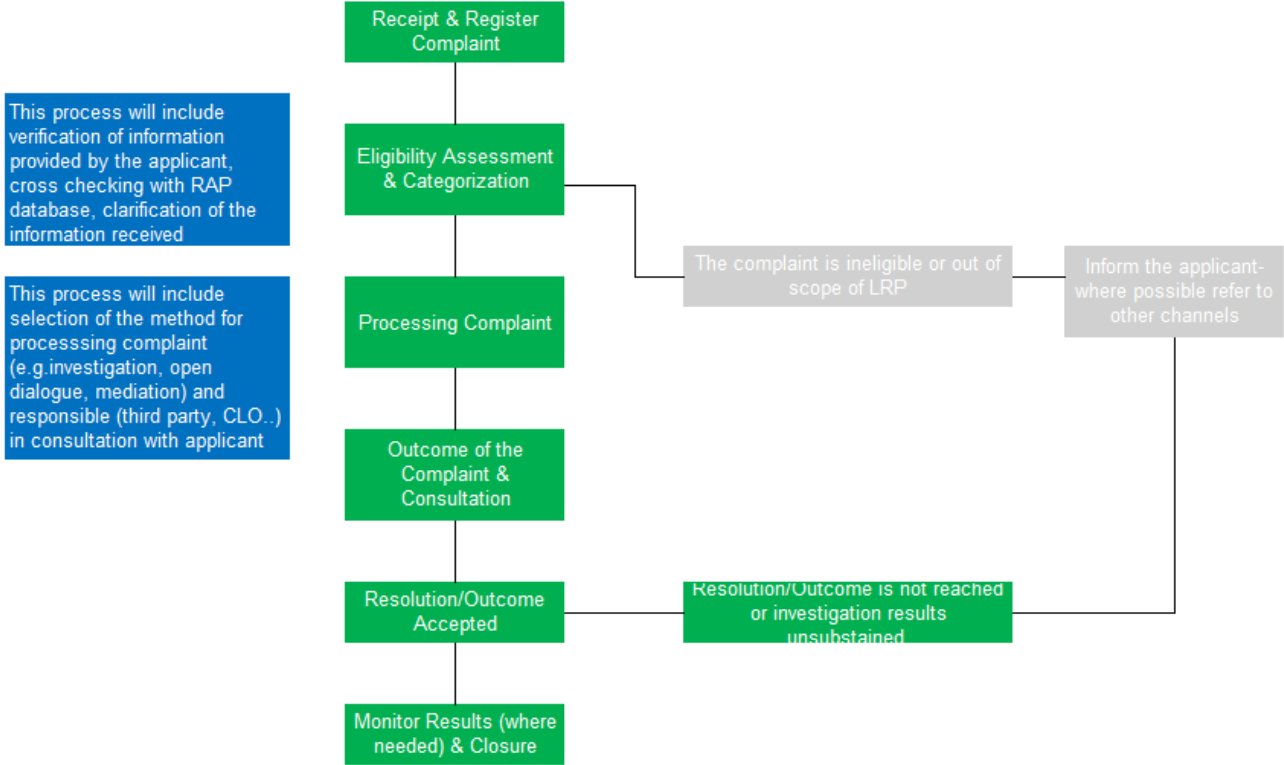


Figure 7: Grievance Management Process for LRF and Land Related Conflicts



## 10.0 ROLES AND RESPONSIBILITIES

This section describes the organisational structure and management functions recommended to be implemented by Aktas Energy LLP, responsible for the stakeholder engagement activities. This structure will complement what already in place shared by Total and shown in section 2.2.

- Project Manager (PM) is responsible for overseeing and coordinating all activities associated with stakeholder engagement, specifically:
  - Ensures that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions are implemented in regard to the stakeholder participation;
  - Determines necessary resources for effective implementation of this SEP;
- Attends stakeholder meetings with technical team members and ensure feedback of stakeholder responses and requests to technical teams are responded to within agreed timescales.
- Grievance Officer (GO) is responsible from eligibility assessment of the complaints, their registration, initial communication to the complainant and assigning responsibilities for management of the complaint to human resources or community liaison officer or a third party in cases of conflict of interest.
- Community Liaison Officer (CLO) is responsible for implementing engagement activities; this assignment plays a critical role as an internal agent for social and stakeholder related matters in Aktas Energy LLP's organisation. The CLO will be on site on a daily basis during construction and should be a member of the local community to ensure easier communication and relations with stakeholders. His responsibilities include:
  - Develop, implement and monitor all stakeholder engagement activities included in this Plan;
  - Liaise with communities and stakeholders to ensure their engagement in line with this SEP;
  - Organise and participate in all engagement activities performed;
  - Regularly update the SEP in collaboration with the PM and management;
  - Regularly update the stakeholder mapping and other databases used within the context of the process;
  - Provide briefings and support to technical teams for meetings with stakeholders;
- Implement and coordinate the grievance mechanism and oversee its practical day to day running;
- Prepare periodical reports.
- Human Resources (HR): is responsible for overseeing and coordinating all activities associated with workers complaints, ensure implementation of safeguarding measures where needed, coordinate with labour contractors and contracting parties in issues related to workers complaints and CLO for complaints associated with both community and workers.

The roles and responsibilities outlined above can be adapted to the organizational structure of Aktas Energy LLP, notwithstanding that all the tasks indicated are properly assigned to a responsible person. The operation of the Project will fall under the responsibility of the Aktas Energy LLP. All staff appointed for stakeholder

engagement activities will have to be qualified for the tasks they are undertaking. If necessary, staff will be provided with appropriate training to ensure they are fit for the job.

The E&S consultant provides support to Aktas Energy LLP in the initial phases of engagement. The E&S consultant prepares the first version of the SEP and is responsible for directly performing or supporting Aktas Energy LLP in performing engagement activities during the ESIA process. At the end of the ESIA process, the SEP will be updated to include main outcomes of engagement activities performed during this phase. Other contractors and subcontractors will not be allowed to run or organize engagement activities autonomously. In addition, contractors and subcontractors' workers will not be allowed to collect grievances from individuals or groups but will redirect them to the official submission channel; workers will have to be properly informed on this aspect during induction training. Contractors and subcontractors may however be involved by Aktas Energy LLP in specific engagement activities on an as needed basis and in the implementation of resolution measures within the grievance mechanism.



## 11.0 MONITORING AND REPORTING

### 11.1 Process Record Keeping

It is vital to keep meticulous records of the stakeholder engagement activities and associated communications throughout the lifecycle of the Project. Solid record keeping not only provides a robust reflection of the process followed but also serves as an indicator of the stakeholder engagement process compliance with the required regulatory framework, policies, and principles.

Aktas Energy LLP will be responsible for keeping track through a specific database of all activities performed within the framework of stakeholder engagement. The record keeping process will include the following aspects:

- Stakeholder identification and mapping, periodically updated;
- Stakeholder engagement activities log, with an indication for each activity performed, including the and location, participants, information disclosed and outcomes of the activity. If agreed by stakeholders, pictures of each activity should be taken and appropriately stored;
- Stakeholders list;
- Meetings minutes;
- Copies of all the communication material distributed to stakeholders;
- Periodical reports prepared; and
- Previous SEP versions.

### 11.2 Monitoring Activities

The SEP will be periodically reviewed by Aktas Energy LLP and updated, as necessary. A continuous monitoring of the implementation of the corporate SEP will be performed throughout the Project's lifecycle to verify the effectiveness of the activities performed and to identify changes necessary to the program of activities, to the engagement methods used and to the roles and responsibilities. This SEP will be monitored through environmental and social auditing/supervision activities undertaken by a responsible entity. An indicative list of auditing and supervision activities shall include:

- The correct implementation of this SEP;
- The compliance to the frequency and to the planned schedule of activities indicated in the SEP; and
- Timely and effective reporting.

The internal audit shall also examine:

- Review of stakeholder engagement activities register to ensure that record is filled correctly;
- Review of stakeholder mapping to ensure that the list is continuously updated; and
- Review of periodic reports to ensure that they are compiled correctly.

In addition, the grievance mechanism will be verified through environmental and social auditing/supervision activities and the audit will address the following:

- The correct implementation of the grievance mechanism methodology;
- Timely and effective responses to grievances.

During the inspections, the audit team shall address in particular:

- Review of the database, to ensure that the recording of grievances is entered correctly;
- Random review of 20% (or at least 4) grievance record forms and dossiers to ensure that information and material is filed and registered correctly.

To monitor the overall effectiveness of the engagement activities, following indicators and data points will be used:

Project Phase	KPI on Stakeholder Engagement	Verification Points
Preconstruction	<p>Percentage of affected groups satisfied with the LRP</p> <p>Number of engagements (group, one to one, public meetings) conducted as per the SEP</p> <p>Number of communication materials prepared and distributed in affected communities</p>	<p>Feedback from affected communities through survey and engagements</p> <p>Stakeholder Engagement Logs</p>
Construction	<p>Number of engagements (group, one to one, public meetings) conducted as per the SEP</p> <p>Percentage of vulnerable groups who joined in engagement activities</p> <p>Decreased number of concerns on similar nature and issues over time</p> <p>Number of communication materials prepared and distributed in affected communities</p>	<p>Stakeholder Engagement Logs</p> <p>Stakeholder Engagement Logs</p> <p>Stakeholder Engagement Logs</p>
Operation	<p>Number of engagements (group, one to one, public meetings) conducted as per the SEP</p> <p>Overall satisfaction of the community with the project</p>	<p>Stakeholder Engagement Logs</p> <p>Endline survey</p>

Project Phase	KPI on Grievance Mechanisms	Verification Points
Preconstruction	<p>Completion of the Grievance Procedure</p> <p>Communication of the Grievance Mechanisms via engagement activities</p>	
Construction	Number of complaints received	Grievance Records

	<p>Number of complaints addressed in a timely manner</p> <p>Decreased number of complaints over time on similar nature and issues</p> <p>Number of complaints results in resolution</p> <p>Percentage of complainers satisfied with the complaint process</p> <p>Percentage of the vulnerable groups in using grievance mechanism holder Engagement Logs</p>	<p>Grievance Records</p> <p>Grievance Records</p> <p>Grievance Records</p> <p>Grievance Records</p> <p>Grievance Records</p>
Operation	Cases reported to judicial mechanism associated with the project (target zero; negative indicator)	

### 11.3 Internal Reporting

The CLO will be responsible for liaising with Aktas Energy LLP management on a regular and on an as-needed basis, to inform the general progress of the Plan's implementation and obtain advice when needed.

Aktas Energy LLP will prepare a report on a six-monthly basis and once at the end of construction activities. Reports will contain the following information:

- Overall data on number and typology of activities performed;
- Attendance and feedback from stakeholders;
- Problems and critical issues emerged;
- Status of grievance mechanism performance and critical issues emerged;
- Corrective actions taken within the Plan and schedule; and
- Decisions to be taken in consultation with management.

Reports will be shared with Aktas Energy LLP management and with any other party deemed necessary. These reports are considered to be a tool to periodically inform internal stakeholders on progress of activities as well as a tool to assist in making relevant decisions. If critical issues on engagement emerge during the implementation of the Plan and requires an immediate resolution, the CLO will consult with the management to agree on the appropriate actions. This will then be documented in the periodic internal report.

### 11.4 External Reporting

To continue a close relationship with the external stakeholders, it is recommended that the Aktas Energy LLP prepares dedicated reports to keep them informed on the Project activities. The following information will be reported in a suitable format:

- Outcomes of environmental monitoring activities;
- Outcomes of Stakeholder engagement activities, with an outline of initiatives carried out and main issues that emerged;
- Information and data on grievances (in anonymous form);
- Data on local employment and local procurement (if available); and
- Any other relevant information to the external stakeholders.

The report will be prepared once bi-annually during the Project construction phase and once at the end of the construction phase; frequency of reporting during the operation phase will be determined by Aktas Energy LLP based on the outcomes of the previous engagements and reporting activities performed. The report will be made available to stakeholders on the Project website, upon request and during engagement activities.

#### Annex 1: Template for Communication of Progress and Mitigation (External)

Identified Risk or Concern	Mitigation Actions	Timeline	Location	Responsible	Contact/Feedback

## 12.0 ESIA PACKAGE DISCLOSURE PROCESS

Disclosure for the Mirny Project is expected to begin by the end of 2025, in compliance with the EBRD Environmental and Social Policy (2019), PR 10<sup>5</sup> and IFC PS1<sup>6</sup>. All key environmental and social documents will be made publicly available for 60 calendar days once the disclosure starts, ensuring stakeholders have sufficient time to review and provide feedback. The disclosure will include the following 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

<sup>5</sup> [EBRD PR 10.](#)

<sup>6</sup> [IFC PS 1.](#)

## ■ **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 distributed through local information points such as municipal offices and community centers in the communities of Mirny, Moyinkum, Chu, and Ulken. Public notices will be issued via newspapers, community boards, and social media to inform stakeholders and invite participants in consultations 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*). More details are provided in **Table 9**. 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 engagements may be reviewed during the disclosure period in case specific needs will arise.

During the disclosure period, the Communication Manager of the Project will manage Q&As received through the website's contact form, coordinating with the Project's Environmental and Social (E&S) team. The Community Liaison Officer (CLO) of the Project will act as the focal point for grievance management. A QR code will be shared on the Project website and distributed in local communities through advertisements and newspapers, enabling stakeholders to submit grievances or requests easily. Disclosure will continue throughout the project's life cycle, with annual progress reports and updates on any significant changes to disclosed documents. The grievance mechanism will always remain available, allowing stakeholders to raise concerns easily and without fear of retaliation.

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](mailto:grievances.mirny@totalenergies.com)
- **By phone CLO:** +7 701 985 4180

This process reflects international best practice and underscores the project's commitment to transparency, accountability, and meaningful engagement with all stakeholders.

..

**Table 9: Proposed consultations during the disclosure period**

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
<b>All (Academics, CSOs, Local communities, Vulnerable Groups)</b>	Disclosure of Project Documents via Aktas website	Website First disclosure foreseen for end 2025; further disclosures throughout Project cycle as needed	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms Communicate feedback and grievance mechanism Provide response to frequently asked questions Ensure transparency of the process	Stakeholder are informed about the project Stakeholders are provided with feedback and grievance channel Inquiries are answered in a transparent and timely manner	Feedback forms and logged complaints/inquiries via website Updates of the Website	Respond to inquiries and complaints Update information	Multilingual disclosure and share of documents (in English, Kazakh and Russian) Communication of the website via local channels: Notices provided to the District and Akimat offices, and circulated to Akims; Notice boards in affected community centres (halls, schools, libraries) and construction areas; TV, radio and local newspaper adverts will be used to communicate the website E-mails will be send to the stakeholder groups to inform about the project website. Information can be also shared via online communication channels.

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
<b>All (Academics, CSOs, Local communities, Vulnerable Groups) Stakeholders for Environmental and Social related issues</b>	Official Disclosure Meeting Focus group on Environmental and Social related issues	Mirny (tentatively) Official meeting foreseen in February 2026	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms Communicate feedback and grievance mechanism Provide response to frequently asked questions Ensure transparency of the process Address issues raised under the EIA process	Stakeholders are informed about the project Stakeholders are provided with feedback and grievance channel Inquiries are answered in a transparent and timely manner	Meeting Minutes and Meeting Logs Correspondence Records	Respond to inquiries and complaints Update information	Communication of the disclosure meeting via local channels: Notices provided to the District and Akimat offices, and circulated to Akims; Notice boards in affected community centres (halls, schools, libraries) and construction areas; TV, radio and local newspaper adverts will be used to communicate the disclosure meeting E-mails will be send to the stakeholder groups to inform about the project disclosure meeting. Information can be also shared via online communication channels. The meetings will be organized in an easily accessible location. Transfers will be facilitated. Audio and video with synchronised captions, transcripts and



Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
							<p>signposting will be used where needed</p> <p>Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</p> <p>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</p> <p>Meeting date and time will consider cultural practices and decided with local authorities to ensure high number of participants</p> <p>Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</p> <p>Online and close voting methods, surveys will be used to allow anonymous feedback</p> <p>Images or diagrams with clear and accessible content with descriptions and</p>

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
							<p>alternative text will be provided</p> <p>Meetings will be organized in local languages.</p> <p>Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</p> <p>Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</p>
<b>All (Academics, CSOs, Local communities, Vulnerable Groups) Stakeholders for Biodiversity related issues:</b> <b>Institute of Botany of Kazakhstan</b> <b>Relevant scientific or other institutions working on Critical Habitats (CH) and Priority Biodiversity Species (PBF)</b>	Official Disclosure Meeting Focus group on Biodiversity related issues	Almaty (tentatively) Official meeting foreseen in February 2026	Disclose project documentation: ESIA, SEP, ESAP and grievance procedures and forms Communicate feedback and grievance mechanism Provide response to frequently asked questions Ensure transparency of the process	Stakeholders are informed about the project Stakeholders are provided with feedback and grievance channel Inquiries are answered in a transparent and timely manner	Meeting Minutes and Meeting Logs Correspondence Records	Respond to inquiries and complaints Update information	Communication of the disclosure meeting via local channels: Notices provided to the District and Akimat offices, and circulated to Akims; Notice boards in affected community centres (halls, schools, libraries) and construction areas; TV, radio and local newspaper adverts will be used to communicate the disclosure meeting

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
			<p>Address issues raised under the EIA process</p> <p>Address issues related to the disclosure of the BAP-F</p>				<p>E-mails will be send to the stakeholder groups to inform about the project disclosure meeting. Information can be also shared via online communication channels.</p> <p>The meetings will be organized in an easily accessible location. Transfers will be facilitated.</p> <p>Audio and video with synchronised captions, transcripts and signposting will be used where needed</p> <p>Use of visual aids and simplified materials will be preferred to support understanding among participants with low literacy levels or limited technical knowledge</p> <p>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</p> <p>Meeting date and time will consider cultural practices and decided</p>

Stakeholder Group	Activity	Location and Frequency	Purpose of Engagement	Expected Outcome	Records	Follow up Actions	Inclusivity and Accessibility Measures
							<p>with local authorities to ensure high number of participants</p> <p>Where possible remote online participation is facilitated if stakeholders cannot join onsite meetings</p> <p>Online and close voting methods, surveys will be used to allow anonymous feedback</p> <p>Images or diagrams with clear and accessible content with descriptions and alternative text will be provided</p> <p>Meetings will be organized in local languages.</p> <p>Project related posters and brochures will be shared with authorities and are designed multilingual (Kazakh-Russian).</p> <p>Information on the outcomes of the meeting will be shared via the agreed appropriate channel.</p>



# Signature Page

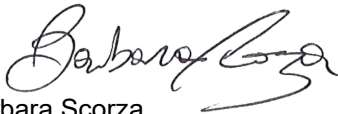
## WSP ITALIA srl

Conti, Valeria  
(ITVC041644)

Digitally signed by Conti, Valeria  
(ITVC041644)  
DN: cn=Conti, Valeria  
(ITVC041644), ou=Active,  
email=Valeria.Conti@wsp.com,  
Date: 2025.12.24 10:03:30 +0100

Valeria Conti  
*Project Manager*

Federico Breda  
*Project Director*



Barbara Scorza  
TotalEnergies ESIA Program Manager

C.F. e P.IVA 03674811009  
Registro Imprese Torino  
R.E.A. Torino n. TO-938498  
Capitale sociale Euro 105.200,00 i.v.

**APPENDIX A**

**Example of Stakeholder  
Engagement Activity Form**



**EXAMPLE OF STAKEHOLDER ACTIVITY FORM**

<b>ID number:</b>	
<b>Engagement activity:</b>	
<b>Location and date:</b>	
<b>Form filled in by:</b>	
<b>Description of the activity or event</b>	
<b>Project phase:</b>	
<b>Typology:</b>	
<b>Announcements and communication:</b>	
<b>Attendee stakeholders</b>	
<b>Attendees Project team and E&amp;S consultant</b>	
<b>Activity details</b>	
<b>Agenda:</b>	
<b>Presentation material used:</b>	
<b>Discussion points:</b>	

Outcomes:	
Actions to be taken:	
Lesson learned	
Other notes	



[wsp.com](http://wsp.com)