



European Bank
for Reconstruction and Development

Atyrau Refinery Modernisation Project, Atyrau region, Kazakhstan

Stakeholder Engagement Plan

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LIST OF ABBREVIATIONS

Name	Description
BWWTP	Biological wastewater treatment facilities
EBRD	European Bank for Reconstruction and Development
EIA	Environmental impact assessment
GRM	Grievance Redress Mechanism
JSC	Joint-stock company
LLP	Limited liability partnership
MWWTP	Mechanical wastewater treatment facilities
NGO	Non-governmental organisations
NTS	Non-technical Summary
RoK	Republic of Kazakhstan
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

This document is a Stakeholder Engagement Plan (hereinafter referred to as “SEP” or “Plan”) of the planned modernisation of the wastewater treatment facilities at the Atyrau Refinery LLP (“the Company”), remediation of the existing wastewater discharge channel and evaporation fields (“the Project”) located in Atyrau region, Kazakhstan.

The Project is categorised as “B” in accordance with the EBRD Environmental and Social Policy (2014).

The SEP is a “living” document and will be updated along with the Project development reflecting needs for and specific of further engagement with stakeholders.

The SEP describes the mechanisms by which people – especially local communities – and other stakeholders¹ are informed about the Project and given opportunities to provide comments and input to the Project development.

In line with the international standards, the main purpose of this SEP is therefore to:

- Explain to directly affected population and other interested stakeholders and members of the public which Project Documents are available and where/how this information can be obtained; and
- Describe the process by which the stakeholders (e.g. vulnerable groups, NGOs, etc.) can provide comments and input, communicate opinions, ask questions and express concerns;

2. PROJECT DESCRIPTION

The Atyrau refinery LLP is a subsidiary of KazMunaiGaz JSC and a largest oil refinery plant in Kazakhstan with crude oil refining capacity of 5.5 million tons per year. The refinery is located in the south-east part of the Atyrau city in the Atyrau Region of the Republic of Kazakhstan (Figure 1).

The refinery consists of the following main territories:

- main site of 235,8 ha;
- two flare facility sites located 300 – 500 m in south and south-east direction from the main site;
- landfill site of 12.25 ha located in 8 km north-east of the main refinery site;
- water intake facility of 0.4 ha located at the Ural River in 2.2 km north-west from the main site;
- evaporation fields of 860 ha located 3 km north-east of the main site.

¹ Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

Figure 1: Location of the Atyrau Refinery in Kazakhstan



Source: Encyclopaedia Britannica, Inc.

As shown in the Figure 2 below, the Atyrau refinery is surrounded by the territories of chemical plant and Atyrau CHPP from north-east; by Zeinolla Kabdолоv Avenue, fire and military department facilities and areas of industrial enterprises from north-west; by residential areas of the Atyrau city from north-west, west and south-west; and by pasture-lands from west and south.

Atyrau Refinery LLP is a subsidiary of JSC "KazMunaiGaz" (KMG) and a largest oil refinery plant in Kazakhstan with installed crude oil refining capacity of 5.5 mln. tons per year, producing up to 35 types of oil products.

The Atyrau refinery was constructed and started operations in 1945. The raw material being refined is a crude oil with a high paraffin content, from Mangyshlak oil deposits of the western regions of Kazakhstan. Its initial refinery capacity was 800,000 tons of oil per year.

1969 - 1971 - the first stage of modernization.

In August 1969, a technological unit for atmospheric oil refining and vacuum distillation of fuel oil ELOU-AVT-3 was put into operation.

In December 1971, a catalytic reforming unit LG-35-11 / 300-95 was put into operation, designed to produce a high-octane component of debutanized gasoline, hydrogen-containing gas and dry gas. The refining capacity of the unit is 300 ths tons of raw materials per year.

1980 - 1989 - the second stage of modernization.

In 1980, the first delayed coking unit (DCU) in Kazakhstan was built at the plant. The design annual capacity was 600 ths tons of raw material. The delayed coking unit ensured the production of 120 ths tons of coke per year, including 54 ths tons of electrode coke per year.

In 1989, a petroleum coke calcining unit (PPCU) was put into operation for the production of calcined coke, which is a raw material for the aluminium industry. The initial design capacity of the PPCU was 140 ths tons per year of raw coke.

In 1992, the Atyrau Refinery for the first time carried out a trial processing of Tengiz oil - a new type of oil with a significantly higher content of light fractions

2002 - 2006 - the third stage of modernization

The project of the Atyrau Oil Refinery Reconstruction was developed by Marubeni Corporation (Japan) and JGC Corporation (Japan) with the involvement of Kazakhstani design institutes such as CJSC KazNIPIEnergoprom (Almaty), OJSC NIPI KazMunayGas, NIPI Caspian Engineering & Research, Kazakhstan Institute of Oil and Gas (Aktau), Shymkent Center DGP "RNITsBHP" (Shymkent), Energy Institute (Almaty).

2012-2016 - the fourth stage of modernization - construction of the Complex for the production of aromatic hydrocarbons and the Complex for deep oil refining.

Atyrau refinery has plans for modernization of its wastewater treatment plants and for remediation of the existing wastewater discharge channel and evaporation fields (the Tazalyq Project).

The Tazalyq Project should be implemented in three following stages:

1. Modernization of a mechanical wastewater treatment facilities (MWWTP).

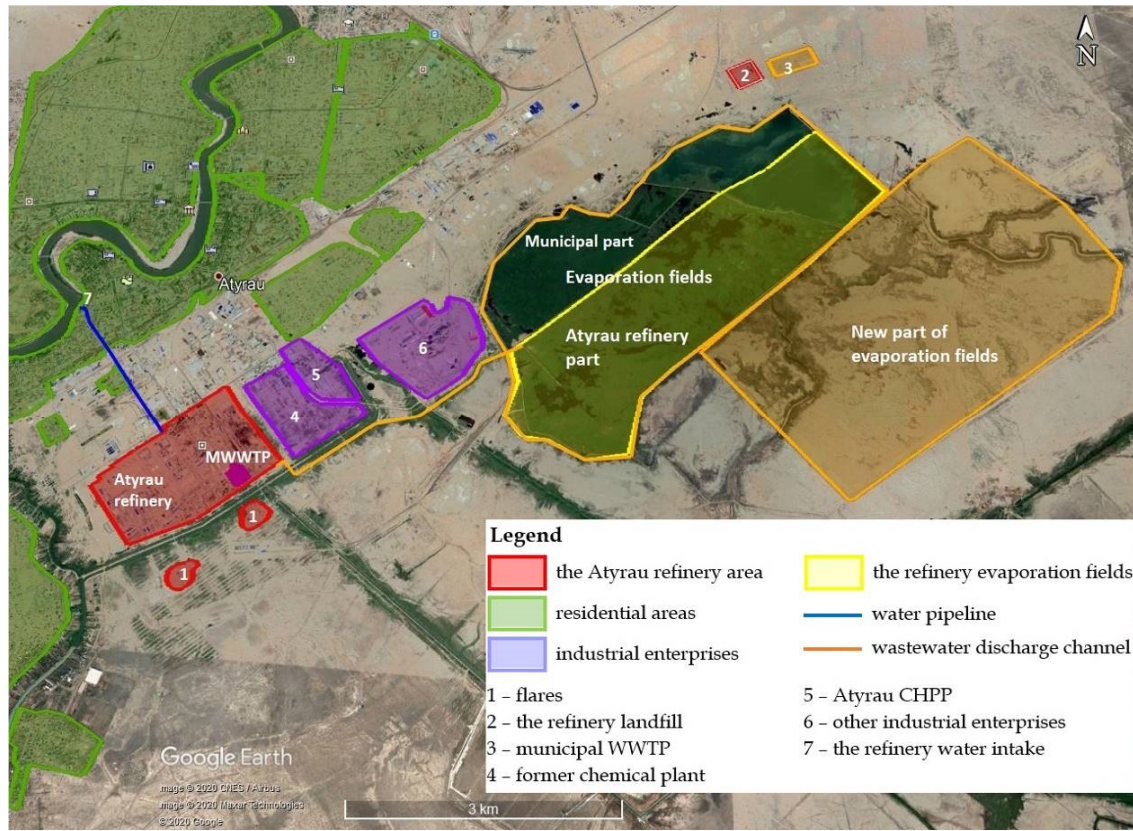
Timeframe: 2019 – 4th quarter 2022.

2. Modernization of a biological wastewater treatment facilities (BWWTP). Based on the results of the implementation of the MWWTP sub-project, an analysis of the quality of wastewater will be carried out and, based on which decisions will be made on the need to implement the design and construction of BWWTP.

3. Remediation of the evaporation fields of 860 ha and construction of a new effluent pipeline extending from the refinery for 10 km (two pipes – operating and reserve) to a municipal wastewater treatment plant instead of existing open wastewater discharge channel.

Timeframe: 2019 – 4th quarter 2023.

Figure 2: Atyrau Refinery surroundings



Source: Google Earth

At present, the Atyrau refinery has developed design solutions only for the first and third stages of the Project (for MWWTP and remediation of the evaporation fields).

3. DESIGN SOLUTIONS FOR THE RECLAMATION OF EVAPORATION FIELDS AND RECONSTRUCTION OF THE STANDARD-TREATED WASTEWATER CANAL HAVE BEEN DEVELOPED AND SENT FOR THE STATE EXPERTISE. THE EXPECTED DATE FOR OBTAINING THE CONCLUSION IS JULY 2021.LEGAL REQUIREMENTS

3.1 Requirements of the RoK legislation relating to public consultation and information disclosure

The Republic of Kazakhstan (RoK) legislation states that the public should be informed about the Project and have an opportunity to comment on the information provided to it during the development / discussion of the Project.

Pursuant to the 2007 Environmental Code of the Republic of Kazakhstan and amendments introduced by Item 2-4, Article 57, Law No 126-VI dated 27 December 2017 (with amendments as of 25 June 2020) of the Republic of Kazakhstan:

- All interested individuals and public associations will be provided with an opportunity to express their opinion during the state environmental expert review process;
- Public hearings will be held in relation to projects, which may directly affect the environment and human health;

- Environmental protection action plans developed for Category I and II facilities for the purposes of emission permits will be subject to public hearings;
- The procedure of public hearings will be determined by an authorised environmental protection authority and will:
 - Identify stakeholders;
 - Specify locations where information and consultations can be received;
 - Specify public notification methods;
 - Specify public consultation methods (written statements, polling);
 - Specify duration of the public hearing process.

Following the state environmental review, all stakeholders will be able to receive information about the target of the review in the manner prescribed by the Environmental Code.

Pursuant to Article 163 of the Environmental Code, environmental information will be public except as required by the applicable laws of the Republic of Kazakhstan. Access to specific data and materials is provided through responses containing such data to requests for information submitted by individuals and legal entities, distribution of such data in the media and the Internet, and in generally available means of communication.

Pursuant to the Instruction on environmental impact assessments² of proposed economic and other activities as part of the development of pre-planning, planning, pre-design and design documents (Article 49), the Company will at all stages of the environmental impact assessment (EIA):

- Ensure the provision of information to and participation of the interested public in the EIA process;
- Provide the interested public with access to the EIA materials.

The public hearings is main organisational form of determining the public opinion. The public hearings cover results of the Preliminary EIA and the EIA of proposed economic activities that may have a significant impact on the environmental and human health.

Pursuant to the Rules of Public Hearings (Order No 135 dated 7 May 2007 as amended on 8 September 2017 of the Minister of Environmental Protection of the Republic of Kazakhstan), public hearings are held in relation to projects that may directly affect the environment and human health and to draft environmental protection action plans. Public hearings provide participants equal rights to express their reasoned opinions based on documentary materials on the issue containing public information.

Participants of public hearings include:

- Interested public;
- Public and non-governmental organisations and associations;
- Local executive and representative bodies, governmental bodies authorised to make relevant decisions;
- Mass media.

The Rules of the Public Hearings also state that the initiator of proposed economic activities will arrange public hearings to discuss the EIA materials. The Company will make a preliminary agreement with local executive authorities regarding the date and venue of the public hearings and include this information in a public hearing announcement to be published in the media by the Company. The announcement should be published in 20 days prior to the date of the public hearings. The local

² Order of the Minister of environmental protection of the Republic of Kazakhstan dated 28 June 2007 No. 204-p On approval of the Instructions for conducting an environmental impact assessment (with amendments as of 17 June 2016)

authorities should provide the access to the EIA materials in 20 days prior to the date of the public hearings.

The Company may use additional means of notifying the public (information sheets, stands etc.).

The announcement should also specify contact details of offices where members of the public may review the EIA materials. Starting from the date of the announcement, the Company will provide the public with access to the EIA materials. The public hearings will be held irrespective of the number of participating members of the public.

During the hearings, any participant will have the right to express his or her opinion and address questions to – and receive answers from – the speakers.

The results of the public hearings will be documented in minutes. The Company and EIA developer will review the results and may decide to improve the Project to incorporate public opinions.

The Project Initiator will be responsible for the financing, technical and information support of the public hearings.

3.2 European Bank for Reconstruction and Development requirements

The EBRD recognises the importance of stakeholder engagement as an essential element of good international practice and corporate citizenship. PR10 contains the following provisions:

- *Development of a Stakeholder Engagement Plan* in order to outline how communication with identified stakeholders will be handled throughout Project preparation and implementation.
- *Information disclosure.* Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project.
- *Meaningful consultation.* If employees and/or affected communities will or may be exposed to significant risks or adverse impacts from the project, the Company will undertake a meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Company (project proponent) to consider and respond to them.
- *Grievance mechanism.* The Company will need to be aware of and respond to stakeholders' concerns related to the Project in a timely manner. For this purpose, the Company will establish an effective grievance mechanism to receive and facilitate resolution of stakeholders concerns and grievances, in particular, about the Company's environmental and social performance.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In accordance with the EBRD's Requirements regarding stakeholder engagement, the Company has identified and documented various individuals and 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 will enable the Company to have a realistic picture of those who have interest in and/or are concerned about the Project and, consequently, should be included in the engagement process.

Preliminarily identified stakeholder groups are presented in the table below (Table 1). Full list of stakeholder is presented in the Appendix A.

Table 1: Identified stakeholder groups

Stakeholder group	Stakeholders
Local communities near the Project facilities, transportation	People, businesses, organizations located in immediate proximity to the Project facilities (residents of Atyrau); People, businesses, organizations located close to transportation routes.

Stakeholder group	Stakeholders
routes, quarries, construction and accommodation camp(s) etc.	
Non-governmental organisations and independent experts	Specialised environmental, social, and research organisations, non-government organisations and community organisations (including Community Councils, Council of elders, community informal leaders)
Public authorities and regulators	National, Regional and Local authorities
Organisations and personnel within the Project, including contractors/subcontractors	Design developers and design organisations, Project partners and consultants, Suppliers and construction contractors, Project personnel, including contractors personnel, Shareholders and Lenders.
Mass media	Internet resources;
Vulnerable community groups potentially affected by the Project	Local residents who may be difficult to engage due to age, disability, education level, social or economic status, etc.

The stakeholder list will be periodically verified and may be changed / supplemented at each stage of the Project implementation.

Classification of the stakeholders was undertaken to identify appropriate engagement methods with the various stakeholder groups. The worst affected stakeholders and/or stakeholders that may have substantial influence on the Project implementation will be communicated with more closely to ensure disclosure of information in a proper manner and to establish a feedback mechanism.

5. PAST STAKEHOLDER ENGAGEMENT

The Company's present stakeholder engagement activities mainly include communication with governmental stakeholders including Administration of Atyrau and other state authorities, Holding Company KazMunaiGaz JSC, NGO and local communities. Government bodies and KazMunaiGaz JSC are communicated with through mandatory reporting and inspection processes.

The Company provides regular information disclosure about activities and plans, mainly through publications on the Company and holding website, newspaper Novator and in social networks. The Company conduct regular meetings with NGO and mass media representatives two or three times annually as part of the scientific and technical conferences. Based on the provided information the last conferences were took place on 17 of May and 4 of November 2019, the general discussions were related to Tazalyq Project.

No stakeholder engagement plan was developed as part of the Project EIA process since it is not required by national legislation. The preliminary EIA for remediation of wastewater evaporation fields formally went through the process of public discussions in December 2019. Based on the Protocol the main concerns of public was related to the process and quality of remediation, as well as the documentation discrepancy.

6. STAKEHOLDER ENGAGEMENT AND DISCLOSURE PLAN

The objectives of the stakeholder engagement are to solicit the feedback from the Project stakeholders on the Project impacts and management measures. Where required, necessary changes to be made to the EIA and related documents during their finalization to reflect the comments received during the disclosure.

6.1 Who Will Be Informed?

During the disclosure period, information will be made available to the groups of stakeholders who are affected by the Project, have interests in the Project or have the potential to influence the Project outcomes. The stakeholder categories that will be targeted for engagement during the disclosure as well as over the entire cycle of the Project are:

- General members of the communities within the Project area of influence (Atyrau city);
- Non-governmental organisations and independent experts,
- Statutory stakeholders (e.g. governmental bodies, administration).
- Organisations and personnel within the Project, including contractors/subcontractors
- Mass media
- Vulnerable community groups potentially affected by the Project

6.2 Special Consideration on Vulnerable Groups

The vulnerable groups among the Project affected population were identified. In this context, the following groups have been identified as vulnerable:

- Economically vulnerable groups:
 - unemployed and/ or individuals without steady source of income,
 - disadvantaged (low-income), large and/ or single-parent families,
 - senior citizens/ pensioners, and
 - people with disabilities,
- People with limited mobility:
 - senior citizens/ pensioners,
 - people with disabilities;
- People who suffer from acute/chronic illness and elderly people;
- Children.

To ensure that all Project affected residents will have an opportunity to receive Project information, raise concerns or make written or oral comments, special provisions needs to be taken to consider vulnerable groups in a meaningful way, comprising:

- Provision of transport to public meetings where needed (e.g. for elderly, physically disabled people or other people who wish to access the locations where public meetings are held). Needs for transport have to be identified through the akimats in the context of preparation of the disclosure meetings;
- Participants should be allowed to either make comments formally during the meeting or informally on a one-to-one basis after a meeting;
- Participants who are not able to read or write should have the opportunity to listen to presentations and provide their concerns verbally to minute takers during or after the meeting.

6.3 Which Information Will Be Available?

The E&S Package that is subject to public disclosure in Kazakh and Russian consists of the following documents:

- National EIAs for all Project stages
- a Non-Technical Summary (NTS).

- a Stakeholder Engagement Plan (SEP);
- Grievance Form

In addition, the updated Project information will be made available to the public via the Project’s internet website <https://www.atyrauenergy.com/> <https://www.anpz.kz.com/> for reading online down-loading. All E&S documents listed above will be uploaded by the Company on the Project website as well as Grievance Brochure and Grievance Form.

6.4 Where will Project Documents be Located?

Key objective of the disclosure and engagement process is to reach as many people as possible. All disclosed Project E&S Documents will be distributed to the Company office and Atyrau akimat.

The following Table 2 gives a summary of information which will be available during the disclosure period and at least two weeks prior to the commencement of the public consultation meetings (see next sections).

Table 2: Locations for Access to disclosed Project Documents by Type of the Project Document

Type of Document	Language	Availability of documents	
		Soft copies	Hard copies
<i>National EIAs for all Project stages</i>	Kaz, Rus	Project website: https://www.atyrauenergy.com/ https://www.anpz.kz/	Office of Atyrau akimat Company office in Atyrau
<i>NTS</i>	Kaz, Rus		
<i>SEP</i>	Kaz, Rus		
<i>Grievance Form</i>	Kaz, Rus		

If necessary, alternative timing and locations for vulnerable groups (e.g. women, physically disabled, elderly, other people with difficulty accessing the planned locations), to be determined based on the results of consultations.

6.5 Stakeholder Engagement and Information Disclosure Programme

No	Measures	Performance indicator	Responsibility	Timeline / frequency
Company's inner procedures				
1.1.	Approve this SEP	SEP is approved	Company	September 2020
1.2.	Introduce Grievance Redress Mechanism (GRM) (see Section 7)	GRM is introduced	Company	
1.3.	Appoint expert responsible for implementation of the SEP and GRM	Order on appointment of specialists	Company	
1.4.	Create a Project-related section on the Company's website. The section should include the following information: <ul style="list-style-type: none"> ■ Summary of the Project, its timing and conditions for implementation; ■ Subsection on environmental and social documentation, ■ Contact details for more detailed information about the Project including contacts of a GRM officer. 	Project-related section on the Company's website	Company	
Disclosure of the E&S documentation and consultations				
2.1.	Publish environmental and social documentation in Kazakh and Russian on the Company's website (see Item 1.4) including the following documents: <ul style="list-style-type: none"> ■ National EIAs for all Project stages, ■ NTS, ■ SEP, ■ Grievance Form. 	Documents published on the Company's website	Company	No later than 20 days prior to consultations
2.2.	Inform stakeholders of information disclosure and proposed consultations by means of the following: <ul style="list-style-type: none"> ■ Publish an announcement on the Company's website and official social media accounts, ■ Publish an announcement on the Atyrau akimat website, ■ Issue a press release about the proposed implementation of the Project including information about public disclosure of environmental and social documents. The announcement should include the following information: <ul style="list-style-type: none"> ■ Date, time and place of the public hearing; ■ Brief Project information; ■ Locations where hard copies of Project materials are placed; ■ Internet resource where soft copies of Project materials are placed; ■ E-mail address where comments and suggestions are accepted. 	<ul style="list-style-type: none"> ■ Announcements on disclosure of project-related information on the Company's website, ■ Announcements on disclosure of project-related information on the Atyrau akimat website, ■ Press release on disclosure of project-related information. 	Company	

No	Measures	Performance indicator	Responsibility	Timeline / frequency
2.3.	Arrange a disclosure-related consultation meeting with local residents. The Company will make a preliminary agreement with local executive authorities regarding the date and venue of the public hearings. During consultations, the Company will provide participants with a printed copy of the E&S package and GRM brochure.	Minutes of meeting	Company	October 2020
2.4.	Publish the minutes of the consultation meeting on the Company's website and Atyrau akimat website	Minutes of the consultation meeting published on the Company's website and Atyrau akimat website	Company	In 5 working days after the consultations
2.5.	Update environmental and social documentation, including SEP, following the consultations and comments received during the disclosure period. Disclosure period starts not later than 30 days prior the consultation and ends not earlier than 10 days after the consultation in order to consider possible comments to minutes of meetings or results of the public hearings.	Updated E&S package with incorporated comments from stakeholders	Company	In 10 working days after the end of disclosure period
2.6.	Publish updated environmental and social documentation on the Company's website.	Documents published on the Company's website	Company	
2.7.	Inform stakeholders about the updated documents by means of the following: <ul style="list-style-type: none"> ■ Publish an announcement on the Company's website and official social media accounts, ■ Publish an announcement on the Atyrau akimat website, ■ Issue a press release about the proposed implementation of the Project including information about public disclosure of environmental and social documents. 	<ul style="list-style-type: none"> ■ Announcements on disclosure of project-related information on the Company's website, ■ Announcements on disclosure of project-related information on the Atyrau akimat website, ■ Press release on disclosure of project-related information. 	Company	
Stakeholder engagement during the construction stage				
3.1.	Inform stakeholders on construction works progress and GRM availability: <ul style="list-style-type: none"> ■ Announcements on the Company's website, ■ Announcements on information boards at the construction sites. 	<ul style="list-style-type: none"> ■ E-announcements; ■ Announcements at construction sites. 	Company	Monthly during the construction phase or when necessary (e.g. conducting of noisy works etc.)

No	Measures	Performance indicator	Responsibility	Timeline / frequency
3.2.	Conduct public consultations to inform stakeholders about the progress of construction works and the functioning of GRM. The frequency of consultations should be determined based on the results of previous consultations.	■ Minutes of meetings	Company	Once a year (at least)
Stakeholders engagement at the operation stage				
4.1.	Inform stakeholders on Company's activities and GRM availability via Company's website.	■ E-announcements	Company	Semi-annually
5. Monitoring and reporting				
5.1.	Include results of SEP implementation in Project implementation report.	■ Section on stakeholder engagement activities in the annual monitoring report	Company	Annually

7. GRIEVANCE REDRESS MECHANISM

The Section should be supplemented with the contact details of personnel responsible for the Grievance Redress Mechanism implementation (*to be determined by the Company*)

In accordance with the international good practice, a so-called “Grievance Procedure” will be established by which the stakeholders can submit their complaints, questions or comments in relation to the Project during its entire lifecycle.

The grievances can be submitted at any time by the stakeholders through the following means:

- Personally to the Company representatives during the public meetings,
- By filling Grievance Forms:
 - in the office of Atyrau akimat (*subject to approval*),
 - at Project website,
- Calling the Project Hotline;
- By e-mail;
- By mail.

E-mail	info@atyrauenergy.com ref@anpz.kz
Online grievances	https://www.anpz.kz/blog/written_requests/
Mail	<i>Atyrau city, Zeinolla Kabdolov Avenue, bld. 1, Atyrau Refinery LPP, 060001</i>

All appeals addressed to the Company (an example of an application form is provided in Appendix D) will be entered in a special register and then accompanied until they are successfully settled. To resolve each complaint, responsible employees of the Company will be appointed, and corrective actions will be developed and implemented.

When considering the appeal, the Company will be guided by the principles of fairness and transparency. Concerning received applications, confidentiality conditions will be applied. The Company will also handle anonymous complaints. Responses to anonymous grievances will be posted on the Company’s website, unless otherwise indicated in the complaint (see details in Appendix C).

Priority will be given to complaints about accidents, hazardous conditions, deterioration of safety, etc. that are associated with activities on construction sites, as well as the behavior of workers and other activities within the framework of the Project that requires immediate action to solve the problem.

Details GRM Procedure is presented in the Appendix B.

To manage and track received requests, a simplified database will be created - the Register of complaints and appeals of individuals and legal entities, in which the following information will be recorded:

- Name and contact details of the applicant;
- Date of receipt of the appeal;
- The essence of the appeal;
- Name of the employee appointed to consider the appeal;
- Decision is taken on appeal;
- Additional measures are taken for treatment;
- Date and content of the response to the applicant about the decision;
- Measures are taken to prevent similar complaints in the future.

The contacts of the person responsible for the implementation of the grievance redress mechanism and interaction with interested parties with all types of interested parties will be communicated to interested parties.

Table 3 below provides for actions to introduce and implement the Grievance Mechanism within the Company.

Table 3: GRM Action Plan

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
6. Introduction of the GRM for stakeholders				
6.1.	Approval of the Grievance Redress Mechanism (Appendix B)	<ul style="list-style-type: none"> The Grievance Redress Mechanism approved by the Company 	Company	Prior to commencement of construction activities
6.2.	Publication of the Grievance Redress Mechanism brochure for external stakeholders on the Company's website (Appendix C)	<ul style="list-style-type: none"> Grievance Redress Mechanism brochure for external stakeholders published on the Company's website 	Company	Prior to commencement of construction activities
6.3.	<p>Appointment of persons responsible for the implementation of the GRM. Their duties will include:</p> <ul style="list-style-type: none"> Receive grievances in line with the GRM; Collect concerns and questions from the public in relation to the Project and provide responses within their competence during the conversation (if it is impossible to give an answer / comment on the question, accept the grievance in accordance with the GRM); Coordinate communications with local communities; track responses and external communications related to the Project; Manage the grievance handling process. 	<ul style="list-style-type: none"> Company's internal order on the appointment of persons responsible for the implementation of the External GRM 	Company	Prior to commencement of construction activities
6.4.	<p>Introduction of an Grievance Log for external stakeholders – a simplified data base to manage grievances received and track their status. The Grievance Log will register all grievances received and will include the following information:</p> <ul style="list-style-type: none"> Claimant's name and contact details; Date of the grievance; Description of the grievance; Name of the handling employee; Resolution on the grievance; Additional measures undertaken in relation to the grievance; Date and description of the response; Measures taken to avoid further similar grievances (if necessary). 	<ul style="list-style-type: none"> Grievance Log for external stakeholders 	Company	Prior to commencement of construction activities
6.5.	<p>Introduction of requirements to implement the GRM into agreements with contractors:</p> <ul style="list-style-type: none"> Receive and register grievances from stakeholders (see Item 6.4); 	<ul style="list-style-type: none"> Agreements with contractors that include provisions on the external GRM 	Company	Prior to commencement of construction activities

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	<ul style="list-style-type: none"> ■ Forward grievances to the Company; ■ Provide responses within their competence. 			
7.	Implementation of the Project Employee Grievance Mechanism			
7.1.	<ul style="list-style-type: none"> ■ Placement of the GRM brochure for the Project employees on the Company's website 	<ul style="list-style-type: none"> ■ GRM brochure for Project employees posted on the Company's website 	Company	Prior to commencement of construction activities
7.2.	Placement of the GRM brochure for the Project employees at information stands in the Company's office and at the Project facilities.	<ul style="list-style-type: none"> ■ Brochure of the GRM for Project employees posted on information stands 	Company	Prior to commencement of construction activities
7.3.	<p>Appointment of persons responsible for the implementation of the GRM. The responsibilities of the staff responsible for the implementation of the GRM include the following:</p> <ul style="list-style-type: none"> ■ Receive complaints and appeals from employees in accordance with the GRM procedure, ■ Administer the process of receiving and considering complaints and appeals. 	<ul style="list-style-type: none"> ■ Order of the Company on the appointment of persons responsible for the implementation of the GRM of the Project employees 	Company	Prior to commencement of construction activities
7.4.	<p>Creation of the Project Employee Complaints Register - a simplified database required to manage received complaints and track their status. All complaints received will be recorded in the Complaints Log, indicating the following information:</p> <ul style="list-style-type: none"> ■ name and contact details of the applicant; ■ Date of receipt of the request; ■ The essence of the appeal; ■ Full name of the employee appointed to consider the appeal; ■ The decision taken on the appeal; ■ Additional measures taken to address; ■ Date and content of the response to the applicant about the decision; ■ Measures taken to prevent similar appeals in the future (if necessary). 	<ul style="list-style-type: none"> ■ Record of complaints from Project employees 	Company	Prior to commencement of construction activities
7.5.	Inclusion in contracts with contractors of requirements for the implementation of GRM elements for Project employees, including the development of the GRM procedure, informing contractor employees	<ul style="list-style-type: none"> ■ Contracts with contractors including relevant GRM provisions for Project employees 	Company	Prior to commencement of construction activities

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	about the operation of the GRM and the appointment of persons responsible for the implementation of the GRM (see clauses 7.1 - 7.3).			
8.	Disclosure of the Grievance Mechanism to the general public			
8.1.	Publication of notices about the availability of the GRM and contact details of GRM officers on information boards: <ul style="list-style-type: none"> ■ At Project construction sites; ■ At offices of local authorities (subject to their approval); ■ At special locations to be determined during public consultations. 	<ul style="list-style-type: none"> ■ Notices on information boards 	Company	Prior to commencement of construction activities
8.2.	Publication of announcements on the establishment of the GRM and contact details of GRM officers on Company's website	<ul style="list-style-type: none"> ■ Announcements on Company's websites 	Company	Prior to commencement of construction activities
8.3.	Notification of stakeholders about the availability of the GRM and contact details of GRM officers during public consultations to be held as of SEP.	<ul style="list-style-type: none"> ■ Minutes of public consultation meetings containing information about the GRM 	Company	Prior to commencement of construction activities and throughout the Project life cycle
9.	Informing Project employees about the work of the GRM			
9.1.	Informing employees about the availability of the GRM when hiring	<ul style="list-style-type: none"> ■ Employment contracts that include information on the GRM 	Company	When hiring new employee
9.2.	Place information about the GRM for the Project employees on the information stands of the Company in the office and at the Project facilities (including construction sites)	<ul style="list-style-type: none"> ■ Announcements on information stands 	Company, contractors	Before the start of construction work and during the entire construction period
10.	Monitoring and reporting			
10.1.	Review of grievances: <ul style="list-style-type: none"> ■ Number of open / resolved / closed grievances received from stakeholders during the reporting period; ■ Number of open / resolved / closed grievances received from Project employees during the reporting period; ■ Breakdown by topics (construction / noise / road safety etc.); ■ Performance dynamics (total number of grievances / number of grievances from specific settlements etc.). 	<ul style="list-style-type: none"> ■ External stakeholders GRM implementation report; ■ Project personnel GRM implementation report. 	Company	Monthly during the construction Quarterly during the operation

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
10.2.	The results of the grievance analysis from external stakeholders are published on the Company's website	<ul style="list-style-type: none"> External stakeholders GRM implementation report is published on the Company's website 	Company	
10.3.	The results of the grievance analysis from Project workers are published on the Company's inner website or placed on information stands in the Company's office and construction sites	<ul style="list-style-type: none"> Internal stakeholders GRM implementation report is published on the Company's inner website or placed on information stands in the Company's office and construction sites 	Company	

Appendix A LIST OF STAKEHOLDERS

The list may be extended/ verified during development of the design documentation and stakeholder engagement process

Groups	Composition	Information source, reference / stakeholder contact details	Rationale / comments
1. Local communities			
Residents of settlements located in immediate proximity to the Project facilities, transportation routes, etc.	<ul style="list-style-type: none"> ■ Residents of Atyrau city. 	-	Socioeconomic impacts
2. Community counsels			
Community Councils / Council of elders / Community informal leaders	Community Councils: <ul style="list-style-type: none"> ■ Community Council of Atyrau Oblast, ■ Community Councils of Atyrau city. 	http://kogamkenes-atyrau.kz/ru/ e-mail: kogamkenes@gmail.com Phone: +7 7122 27 09 97	Community representatives
3. Government authorities and regulators			
National authorities	Ministry of Industry and Infrastructure Development of the Republic of Kazakhstan	http://www.miid.gov.kz/en Administration: +7 (7172) 983-135, 983-307, 983-333, 983-309, 983-308 Helpline: +7 (7172) 983-151 Press secretary: +7 (7172) 983-349, 983-351, 983-352, 983-354, 983-471 e-mail: miid@miid.gov.kz e-mail Press service: 241704@bk.ru	General government issues
	Ministry of Justice of the Republic of Kazakhstan	http://www.adilet.gov.kz/en Administration: +7 (7172) 74-07-97, e-mail: kanc@adilet.gov.kz Helpline: +7 (7172) 74 09 62 Press service: +7 (7172) 74-06-01	Permits and approvals
Regional authorities	Akimat of the Atyrau Region	http://atyrau.gov.kz/ Phone: 8 (7122) 354-092 E-mail: obl.akimat@atyrau.gov.kz	Permits and approvals

Groups	Composition	Information source, reference / stakeholder contact details	Rationale / comments
	Land Relation Department of Atyrau Region	http://atyrau.gov.kz/page/read/Upravleniya_zemelnyh_otnoshenij.html Phone: 8(7122) 27-31-61 E-mail: obl.akimat@atyrau.gov.kz	Permits and approvals
	Department of architecture and urban development of Atyrau Region	http://atyrau.gov.kz/page/read/Upravlenie_arhitektury_i_gradostroitelstva.html Phone: 8/7122/ 32-03-61, 32-03-63 Helpline: 8/7122/ 32-03-60 E-mail: atyrau-grad71@mail.ru	Permits and approvals
	Department of culture, archive and documentation of Atyrau Region	http://atyrau.gov.kz/page/read/Directorate_of_Culture_Archives_and_Documentation.html E-mail: u.kultura@atyrau.gov.kz Phone: 8/7122/ 32-41-37	Permits and approvals
Local authorities	Atyrau city Akimat	http://atyrau.gov.kz/page/read/Akim_at_goroda_Atyrau_akimaty.html Phone: 8 (7122) 35-41-54 E-mail: akimat_gorodatyrau@mail.ru	Permits and approvals Organisation of engagement with local community
4. Organisations within the Project, their personnel and contractors			
Project partners, suppliers and construction contractors	The list may be extended/ verified during development of the design documentation	-	Internal stakeholders
Shareholders and Potential Lenders	European Bank for Reconstruction and Development	https://www.ebrd.com/home	Lender
5. Non-government organisations and independent experts			

Groups	Composition	Information source, reference / stakeholder contact details	Rationale / comments
Specialised environmental, public, and research organisations; experts	<ul style="list-style-type: none"> ■ Zhaiyk-Caspian Aarhus center, ■ Public Association "Choice of young people-Atyrau", ■ The society of pensioners of the Atyrau refinery, ■ Senim Shyny public association of disabled people, ■ Kazakhstan Oil And Gas Industry Labor Union, ■ The branch of the Red Crescent Society, ■ Atyrau educational and production enterprise of the Kazakh society of the blind, ■ Educational and production enterprise of the Kazakh society of the deaf. 	<p>https://www.facebook.com/Жайык-Каспийский-Орхусский-центр-322008774963942/ Phone: 8 701 781 29 68, E-mail: aarhus-akta@mail.ru</p>	Potential interest in the Project
6. Mass media			
Internet resources	Atyrau youth portal	http://zhasatyrau.kz/	Communication means
	■		
	■		
	■		
7. Vulnerable community groups potentially affected by the Project			
Vulnerable community groups potentially affected by the Project	Local residents who may be difficult to engage due to age, disability, education level, social or economic status, etc.	-	Potential adverse impacts of the Project

Appendix B GRM PROCEDURE

1. Receiving a grievance		
Method of receiving a grievance	Timeline for registration of the grievance	Timeline for sending a notice of grievance registration to the applicant
<i>Personal reception</i>	During personal reception	Within <u>one day</u> of receiving the grievance receipt, if the complaint relates to <u>security issues</u> ; Within <u>3 working days</u> of receiving the grievance – for all <u>other complaints</u>
<i>By phone</i>	During phone call	
<i>By e-mail</i>	On the date of receiving the email	
<i>By mail</i>	On the date of receiving the letter	
<i>By website</i>	On the date of receiving the application	
<i>Forwarding complaints from General Contractor and subcontractors</i>	On the date of receiving the grievance by the General Contractor or subcontractors	
2. Definition of the responsible person for grievance handling:		
Based on the nature of the complaint and the division of responsibilities between Project participants: <ul style="list-style-type: none"> ■ The complaint is investigated within the Company (see paragraph 2.1 below), ■ The complaint is addressed to the General Contractor, investigation is controlled by the Company (see paragraph 2.2 below), ■ The complaint is rejected and recommended to be sent to the local authorities if the complaint is not the responsibility of the Project (see 2.3 below). 		
Type of grievance	Timeline for definition of the responsible party: Company or the General Contractor	
Safety issues related to the behavior of workers and activities on construction sites, operation of the reconstructed road, etc.	On the date of receiving the grievance	
Other issues	Within 5 working days of receiving the grievance	
2.1. Investigation of the grievance within the Company:		
<ul style="list-style-type: none"> ■ Investigation of the facts and causes of the issue, ■ Development of measures to address the issue / mitigate the impact, ■ Consultation with the applicant on the measures developed, ■ Implementation of corrective measures, ■ Consultation with the applicant on the measures applied. 		
Type of grievance	Timeline for definition of the responsible person by Company	Timeline for investigation
Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving the grievance
Other issues	Within 3 working days of receiving the grievance	Within 30 days of receiving the grievance
2.2. Monitoring of grievance handling by the General Contractor:		
<ul style="list-style-type: none"> ■ Notification of the applicant about the forwarding of the grievance redress to the General Contractor (in parallel with the grievance forwarding to the General Contractor), ■ Control over the appointment of the responsible person, ■ Control over the investigation of the facts and causes of the issue, ■ Control over the development of measures to address the issue / mitigate the impact, 		

	<ul style="list-style-type: none"> ■ Control over the consultation with the applicant on the measures developed, ■ Control over the implementation of corrective measures, ■ Control over the consultation with the applicant on the measures developed applied. 		
	Type of grievance	Timeline for definition of the responsible person by General Contractor	Timeline for investigation by General Contractor
	Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving the grievance
	Other issues	Within 3 working days of receiving the grievance	Within 30 days of receiving the grievance
2.3.	Notifying the applicant of the rejection of the complaint and recommending to send it to the local authorities		
3.	Settlement of the grievance		
	Result of investigation	Further actions	
	The grievance is settled	The applicant is invited to sign a statement of satisfaction with the decision	
	The grievance is not settled (additional time is required to investigate the issue)	Letter to extend the period of consideration of the complaint is sent to the applicant. The additional period of grievance investigation may not exceed 15 calendar days	
	The grievance is not settled	<p>The grievance is re-investigated; the applicant is consulted on possible solutions.</p> <p>If the grievance cannot be resolved, the applicant may be proposed to appeal to the court.</p>	

Appendix C STAKEHOLDERS GRIEVANCE BROCHURE

EXTERNAL STAKEHOLDERS GRIEVANCE BROCHURE

The implementation of major investment projects may have a negative impact on the residents of the nearest locality.

Atyrau Refinery LLP commits to handle fairly and transparently any potential issues and concerns during pre-construction, construction and operation of Project facilities.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled.

Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

What kinds of grievances may be submitted?

You can submit a grievance if you believe that the Project has an adverse impact on you or your place of residence, e.g.:

- Noise and dust from construction activities;
- Road safety risks;
- Unethical behavior by project employees;
- Infringement of rights of local residents;
- Offences committed by project employees or by Project-related activities, etc.

Atyrau Refinery LLP will handle all grievances received in relation to the Project. If a grievance is not related to the Project, you will be provided with a written explanation. In all other cases, the Company will investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address:
- Send an e-mail to: info@atyrauenergy.com
- Complete an electronic grievance form on Company's website at https://www.anpz.kz/blog/written_requests/
- Request a personal appointment.

Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on the Company's website, unless otherwise indicated in the complaint.

You can also file grievances on a confidential basis. If you select not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance officers. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at Project construction sites that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

Stage 1

Receipt of a grievance

- You can file your grievance to the Company using one of the ways described above.

Stage 2

Registration of the grievance

- Once the grievance is received, it will be registered, and a handler will be appointed.

Stage 3

Acknowledgement of receipt

- Within 3 working days after receiving your grievance, the Company will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

Stage 4

Investigation and resolution

- The Company will investigate the facts and causes of the issue. During the investigation, you may be contacted by authorised persons who may request additional information. Once the investigation has been completed, you will receive a letter outlining its results and proposed response measures if necessary.

Stage 5

Closure of the grievance

- The Company will use its best endeavours to settle the grievance within 30 days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, the Company will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If a grievance is outside Company area of competence, you may be asked to apply to a court or other non judicial authorities to review your complaint.

Stage 6

Monitoring

- The Company may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.

Appendix D EMPLOYEE GRIEVANCE BROCHURE

EMPLOYEE GRIEVANCE PROCEDURE BROCHURE

Project employees may express dissatisfaction with the actions of other employees or the actions of Atyrau Oil Refinery LLP and its contractors in relation to their employment by filing complaints. Most of the complaints can be resolved on a routine basis by discussing it with your line manager. In this regard, the Company recommends, before using this procedure, to try to resolve the issue through such discussion.

However, situations may arise where discussion with the immediate supervisor is not possible, for example, if the complaint concerns him personally or is not within the competence of the supervisor. In such cases, the employee has the right to use the grievance mechanism below.

This grievance procedure includes information about what grievances will be considered, what methods can be used to convey a grievance or express concern about the implementation of the Project, as well as the stages of resolving such issues.

Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

What kinds of grievances may be submitted?

You can submit a grievance if you think that the implementation of the Project does not meet safety requirements, has a negative impact on you or your colleagues, etc. for example:

- Failure to comply with safety measures during the performance of work, transportation of goods and personnel, etc.,
- Unethical behavior of the Project employees,
- Violation of the rights of employees by activities under the Project,
- Offenses committed by the employees of the Project, or activities under the Project, etc.

The company will consider all complaints it receives, investigate the facts and causes of negative impacts and determine measures to solve the problems that have arisen and prevent repeated incidents.

How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address:
- Send an e-mail to: info@atyrauenergy.com
- Complete an electronic grievance form on Company's website at https://www.anpz.kz/blog/written_requests/
- Request a personal appointment.

Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on the Company's website, unless otherwise indicated in the complaint.

You can also file grievances on a confidential basis. If you select not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance

officers. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at Project construction sites that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

Stage 1

Receipt of a grievance

- You can file your grievance to the Company using one of the ways described above.

Stage 2

Registration of the grievance

- Once the grievance is received, it will be registered, and a handler will be appointed.

Stage 3

Acknowledgement of receipt

- Within 3 working days after receiving your grievance, the Company will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

Stage 4

Investigation and resolution

- The Company will investigate the facts and causes of the issue. During the investigation, you may be contacted by authorised persons who may request additional information. Once the investigation has been completed, you will receive a letter outlining its results and proposed response measures if necessary.

Stage 5

Closure of the grievance

- The Company will use its best endeavours to settle the grievance within 30 days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, the Company will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If a grievance is outside Company area of competence, you may be asked to apply to a court or other non judicial authorities to review your complaint.

Stage 6

Monitoring

- The Company may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.