



Supplementary  
Environmental &  
Social Impact  
Assessment (ESIA)  
for Almaty Railroad  
Bypass Project,  
Kazakhstan  
Stakeholder Engagement Plan

DATE  
21 February 2025

REFERENCE  
0753033



DOCUMENT DETAILS

DOCUMENT TITLE	Supplementary Environmental & Social Impact Assessment (ESIA) for Almaty Railroad Bypass Project, Kazakhstan
DOCUMENT SUBTITLE	Stakeholder Engagement Plan
PROJECT NUMBER	0753033
DATE	21 February 2025
VERSION	Final
AUTHOR	Environmental Resources Management (S) Pte Ltd
CLIENT NAME	Asian Infrastructure Investment Bank (AIIB)

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	01	Various	Rutuja Tendolkar, Sumati Bhatia	Rutuja Tendolkar	03 February 2025	-
Final	02	Various	Rutuja Tendolkar, Sumati Bhatia	Rutuja Tendolkar	21 February 2025	Draft 2 addressing comments from AIIB/IFC.

# Supplementary Environmental & Social Impact Assessment (ESIA) for Almaty Railroad Bypass Project, Kazakhstan

Stakeholder Engagement Plan  
0753033



---

**Rutuja Tendolkar**

Partner

Environmental Resources Management (S)  
Pte Ltd

20 Collyer Quay, #15-01/02

Singapore 049319

T +65 6324 9636

## CONTENTS

<b>1.</b>	<b>INTRODUCTION</b>	<b>1</b>
1.1	PROJECT OVERVIEW	1
1.2	SCOPE AND OBJECTIVES OF STAKEHOLDER ENGAGEMENT	2
1.3	LIMITATIONS TO THE SCOPE OF APPLICATION	3
1.4	STRUCTURE OF THE STAKEHOLDER ENGAGEMENT PLAN	3
<b>2.</b>	<b>APPLICABLE REFERENCE FRAMEWORKS</b>	<b>3</b>
2.1	NATIONAL LEGAL REQUIREMENTS IN KAZAKHSTAN ON STAKEHOLDER ENGAGEMENT	3
2.2	IFC PERFORMANCE STANDARDS (2012)	4
2.2.1	IFC Stakeholder Engagement Handbook (2007)	6
<b>3.</b>	<b>PROJECT STAKEHOLDERS</b>	<b>6</b>
3.1	STAKEHOLDER IDENTIFICATION AND ANALYSIS	7
3.2	VULNERABLE GROUPS	10
3.3	STAKEHOLDER MAPPING	11
3.4	STAKEHOLDER CATEGORIES	12
<b>4.</b>	<b>PAST STAKEHOLDER ENGAGEMENT AND DISCLOSURE</b>	<b>20</b>
4.1	PRIOR TO NATIONAL EIA	20
4.2	OFFICIAL ANNOUNCEMENT, NATIONAL EIA AND CONSULTATIONS WITH THE LENDERS	21
4.3	STAKEHOLDER ENGAGEMENT UNDERTAKEN FOR SUPPLEMENTARY ESIA DEVELOPMENT	23
4.3.1	Reconnaissance and Biodiversity Visit: 23 September – 04 October 2024	23
4.3.2	Environment and Social Consultations: 28 October – 05 December 2024	24
4.3.3	Physical Displacement Consultations And Final Data Collection: 15 – 24 January 2025	26
<b>5.</b>	<b>STAKEHOLDER ENGAGEMENT STRATEGIES FOR FUTURE PROJECT PHASES</b>	<b>26</b>
5.1	STRATEGIES FOR INFORMATION DISCLOSURE, COMMUNICATION AND CONSULTATIONS	27
5.2	DISCLOSURE OF THIS SUPPLEMENTARY ESIA	27
5.2.1	Timeline of Supplementary ESIA Disclosure	27
5.2.2	Information Disclosure of Supplementary ESIA (SEP-GRM, NTS, LRP-RF, ESMP)	27
5.2.3	Additional Methods of Supplementary ESIA Disclosure	28
5.3	STAKEHOLDER ENGAGEMENT STRATEGIES FOR THE PROJECT CONSTRUCTION PHASE (COMMUNITY-LEVEL)	29
5.4	STAKEHOLDER ENGAGEMENT STRATEGIES FOR THE PROJECT OPERATION PHASE (COMMUNITY-LEVEL)	29
5.5	RESPONSIBLE STAKEHOLDERS FOR SEP IMPLEMENTATION	30
5.6	STAKEHOLDER ENGAGEMENT PLAN	32
<b>6.</b>	<b>PROJECT-LEVEL GRIEVANCE MECHANISM</b>	<b>44</b>
6.1	OVERVIEW	44
6.1.1	Grievance Mechanism at a Corporate Level	46
6.1.2	Grievance Mechanism at Project Level (Labour)	46
6.1.3	Grievance Mechanism at Project Level (Community)	47
6.1.4	Grievance Mechanism at Government Level	49
6.2	PROPOSED GRIEVANCE PROCEDURE FOR THE PROJECT LEVEL COMMUNITY GRM	49
<b>7.</b>	<b>MONITORING AND REPORTING</b>	<b>51</b>
7.1	REPORTING	52

7.2	TRAINING	52
7.3	MONITORING INDICATORS	52
7.4	SEP-GRM IMPLEMENTATION SCHEDULE	53

APPENDIX A	FORMAT FOR REPORTING STAKEHOLDER ENGAGEMENT
APPENDIX B	SUMMARY OF ALL STAKEHOLDER ENGAGEMENTS
APPENDIX C	LABOUR RELATED GRIEVANCE
APPENDIX D	LABOUR GRIEVANCE MECHANISM FORM
APPENDIX E	COMMUNITY GRIEVANCE REGISTRATION AND FOLLOW-UP FORM

## LIST OF TABLES

TABLE 1-1	STRUCTURE OF STAKEHOLDER ENGAGEMENT PLAN	3
TABLE 2-1:	APPLICABLE IFC PERFORMANCE STANDARDS	4
TABLE 3-1:	IDENTIFIED STAKEHOLDERS (CONSTRUCTION PHASE)	7
TABLE 3-2:	ANALYSIS OF STAKEHOLDER CATEGORIES	13
TABLE 5-1:	INSTITUTIONAL SETUP FOR THE IMPLEMENTATION OF THE SEP	30
TABLE 5-2:	STAKEHOLDER ENGAGEMENT PLAN	33
TABLE 7-1:	PROPOSED TIMELINE FOR SEP IMPLEMENTATION	53

## LIST OF FIGURES

FIGURE 3-1:	STAKEHOLDER MAPPING MATRIX	12
FIGURE 6-1:	PROJECT LEVEL GRM (ALONG WITH EXISTING GRM)	45

## ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AIIB	Asian Infrastructure Investment Bank
AoI	Area of Influence
CBO	Chief Business Officer
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ERM	Environmental Resources Management
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESMU	Environmental and Social Management Unit
FGD	Focus Group Discussion
GRC	Grievance Redressal Committee
GRM	Grievance Redressal Mechanism

Acronyms	Description
Ha	Hectares
HR	Human Resources
HSE	Health, Safety & Environment
IFC	International Finance Corporation
KCT	KCT Subcontractor
KEGOC	Kazakhstan Electricity Grid Operating Company
KII	Key Informant Interview
KTZ	Kazakhstan Temir Zholy Joint Stock Company
KZ	Kazakhstan
LRIT	Livelihood Restoration Implementation Team
LRP	Livelihood Restoration Plan
NGO	Non-Governmental Organisation
O&M	Operations & Management
OHS	Operations, Health and Safety
PAE	Project Affected Entity
PS	Performance Standard
PTCM	PTCM Subcontractor
RAP	Resettlement Action Plan
RCIA	Rapid Cumulative Impact Assessment
RF	Resettlement Framework
RoW	Right of Way
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SSI	Semi-Structured Interview
USD	United States Dollar

# 1. INTRODUCTION

The Asian Infrastructure Investment Bank ("AIIB") and the International Finance Corporation ("IFC"), collectively referred to as the "Lenders", are considering financing the construction and operation of the Almaty Railroad Bypass (the "Project"), which is under development by the Kazakhstan Temir Zholy Joint Stock Company (the "Developer" or "KTZ").

Environmental Resources Management (S) Pte Ltd ("ERM") has been commissioned to prepare this document, the Stakeholder Engagement Plan (SEP), as part of the Supplementary Environmental and Social Impact Assessment (ESIA) for the Lenders' consideration.

This Stakeholder Engagement Plan (SEP) has been developed to outline the engagement strategy for the Almaty Railroad Bypass project, as part of the broader Environmental and Social Impact Assessment (ESIA) process. The Project is especially significant given its location on previously utilised agricultural land and its potential impact on local communities and the environment<sup>1</sup>.

## 1.1 PROJECT OVERVIEW

The Almaty Railroad Bypass (henceforth "the Project") is a vital railway infrastructure project designed to enhance connectivity between Kazybek Bek and Zhetygen, traversing the districts of Talgar, Iliy, Karasai, and Zhambyl. As part of the Trans-Caspian International Transport Route—commonly known as the Middle Corridor—this project aims to alleviate the current railway overload and logistical bottlenecks around the city of Almaty.

The Project involves the construction of railway bypass with a total track length of 130km of new railway track (of which approximately 75km is the main track between Kazybek Bek and Zhetygen. The remaining 55km serves as maintenance tracks / branch lines / interchange lines etc.), five (5) stations including three (3) new and two (2) extended/modernised, three (3) main substations<sup>1</sup>, three (3) switches to guide trains from one track to another, a single-circuit 10 kV overhead line, 13 bridges, five (5) rail overpasses and one (1) road crossing.

The Project's resource and design requirements, as well as its potential (and/or existing) impacts on stakeholders, are documented in the Supplementary ESIA Report. Notably, at the time of writing (31 January 2025), KTZ has provided a list of 274 land plots along the alignment which will be affected by the Project, including a list of newly identified affected land plots (10) at Zhetygen station that are potentially affected by physical displacement<sup>2</sup>. As the Project's land procurement may lead to physical and economic displacement, further assessment is required when the Project boundaries are made available. Surveys, studies and stakeholder consultations will need to be conducted to further assess impacts of the changes, and the stakeholder engagement plan will need to be updated accordingly should any new categories of impacts be found.

---

<sup>1</sup> Three (3) cases of physical displacement were incidentally discovered by ERM through interviews with impacted entities as part of the Supplementary ESIA. In view of negligible settlements along the alignment, the extent of physical displacement may be isolated. Further assessment on the extent of physical displacement caused by the Project's land procurement and a review of the due process which took place is needed.

<sup>2</sup> Refer to the LRP for a detailed breakdown of the categories of land ownership and land use type.



## 1.2 SCOPE AND OBJECTIVES OF STAKEHOLDER ENGAGEMENT

This document presents the Stakeholder Engagement Plan (SEP), which is applicable to all activities to be undertaken for the Project by the Project proponent, KTZ, or other parties contracted by KTZ, that engage key stakeholders identified as part of this Plan.

Stakeholders are defined as individuals or groups who:

- (a) are directly or indirectly affected by a project (Project Affected Persons); and
- (b) may have interests in a project and/or ability to influence its outcome, either positively or negatively (other interested parties).

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of stakeholders, and building constructive and responsive relationships that are important for successful management of a project's environmental and social risks, as well as the sustainability of a project's outcomes

The purpose of this document is to guide stakeholder consultations across various stages of the project, while meeting the requirements of the applicable reference framework for the Project. Overall, this SEP will enable stakeholder engagement to be undertaken in a systematic and meaningful manner, where the various stakeholder groups are able to express their individual views, opinions and concerns, while allowing the Project to appropriately respond to them.

The objectives of this SEP-GRM are as follows:

- Identification of the stakeholder groups in the project location and analysis of their profiles, interests, issues/impacts and concerns relevant to the project, especially those such as agricultural workers which are not engaged with in the land acquisition process;
- Identification of specific measures to allow meaningful engagement with different stakeholder groups identified in a manner that is transparent and accessible and using culturally appropriate communication methods with a specific focus on the stakeholders with high influence/impact;
- Implementation of a viable Grievance Redressal Mechanism (GRM).
- Facilitate adequate and timely dissemination of information to the stakeholder groups in a culturally appropriate manner;
- Provide systems for prior disclosure/dissemination of information and consultation including seeking inputs from affected persons, incorporation of inputs, as applicable, providing feedback to affected persons/groups on whether and how the input has been incorporated; and
- Providing a mechanism for documentation of the activities undertaken and the reporting and monitoring of the same.

It is noted that this SEP-GRM is designed for community stakeholder external engagement between the Project and identified primary and secondary stakeholders. Engagement and resolving grievances within the Project organisation at the corporate level, will be under the responsibility of KTZ, and with contractors and workers will be under responsibility of both KTZ, and the EPC contractors (redressal process at contractor/worker level can be found in **Appendix C**). Flowcharts describing the various stakeholder engagements can be found in Figure 6-1: Project Level GRM (along with Existing GRM).



### 1.3 LIMITATIONS TO THE SCOPE OF APPLICATION

At the time of writing (January 2025), the Project is in the construction phase, with works anticipated to be completed by the end of 2026. Land procurement is underway and expected to be complete by early 2025. Hence, the Stakeholder Engagement Plan applies only to limited aspects of construction (where feasible), resettlement delivery (as per the LRP and Resettlement Framework) and the operational phases of the Project.

The Stakeholder Engagement Plan is designed as a live document to be used and updated by the Project proponent (KTZ), its contractors and subcontractors, and associated parties performing tasks or activities related to the Project and interact with stakeholder groups like landowners, land users, District Akimats and workers, among others.

### 1.4 STRUCTURE OF THE STAKEHOLDER ENGAGEMENT PLAN

The Stakeholder Engagement Plan is structured with reference to the 'Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets' publication by IFC (2007). The sections in this Stakeholder Engagement Plan is presented in **Table 1-1**.

**TABLE 1-1 STRUCTURE OF STAKEHOLDER ENGAGEMENT PLAN**

Section	Description
1	Introduction
2	Applicable Frameworks
3	Project Stakeholders
4	Past Stakeholder Engagement and Disclosure
5	Stakeholder Engagement Strategies for Ongoing and Future Project Phases
6	Project Grievance Mechanism
7	Monitoring and Reporting

## 2. APPLICABLE REFERENCE FRAMEWORKS

The Project will conform to the legal and administrative requirements of the Government of the Republic of Kazakhstan and relevant international standards, particularly the IFC Performance Standards. This section will present the relevant national legal requirements in the Republic of Kazakhstan on stakeholder engagement and disclosure, as well as IFC PS requirements on stakeholder engagement relevant to the Project.

### 2.1 NATIONAL LEGAL REQUIREMENTS IN KAZAKHSTAN ON STAKEHOLDER ENGAGEMENT

A national Environmental Impact Assessment was undertaken for the Project in compliance with the 2007 Environmental Code, with publicity purportedly ensured through public hearings, which give all interested citizens and public associations the opportunity to express their opinion (Article 57).

The national requirement for engaging public opinion is only applicable during the National EIA procedure. There are no provisions for stakeholder engagement after the conduct of the National EIA, such as during the Project's pre-construction, construction or operational stages.

The process for public hearings as part of the National EIA conducted is described below, in accordance with the Environmental Code of 2007.

### Notification and Preparation:

Article 57-2(3): Local executive bodies must provide public access to environmental information related to the National EIA at least twenty days before the public hearings. This information is made available through internet resources and other means of public communication.

### Conducting the Hearings:

Article 57-2(1): Public hearings are mandatory for projects in sectors like agriculture, forestry, mining, and others listed under the authorized body in the field of environmental protection. They also cover projects located in sensitive areas such as water protection zones or state forest fund lands.

Article 57-2(2): The project initiator can involve public associations to help conduct these hearings, ensuring that all stakeholder views are considered.

### Documentation and Response:

Article 57-2(4): The procedure for holding public hearings, including how they are conducted and how public participation is facilitated and recorded, is determined by the authorized body in the field of environmental protection.

## 2.2 IFC PERFORMANCE STANDARDS (2012)

The IFC Performance Standards (PS) is an integral part of IFC's approach to risk management and are directed towards clients to provide guidance on how to identify impacts and risks. The PS is also designed to help mitigate, avoid, and manage risks and impacts to act in a sustainable way. The IFC PS that have been considered, especially in relation to the guidance set out regarding participation, in developing this SEP include PS 1, 2, 4, and 5 (**Table 2-1**).

TABLE 2-1: APPLICABLE IFC PERFORMANCE STANDARDS

Performance Standard	Key Components
PS1: Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"><li>Develop and implement a Stakeholder Engagement Plan that is scaled to the Project's risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.</li><li>The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the Affected Communities. Effective consultation is a two-way process that should:</li></ul>

Performance Standard	Key Components
	<ul style="list-style-type: none"> <li>(i) 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;</li> <li>(ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;</li> <li>(iii) focus inclusive engagement on those directly affected as opposed to those not directly affected;</li> <li>(iv) be free of external manipulation, interference, coercion, or intimidation;</li> <li>(v) enable meaningful participation, where applicable; and</li> <li>(vi) be documented.</li> </ul> <ul style="list-style-type: none"> <li>Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process</li> </ul>
PS 2: Labour and Working Conditions	<ul style="list-style-type: none"> <li>Provide information regarding their rights under national labor and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits.</li> <li>Inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.</li> <li>The Construction phase ESMS contains a disclosure and internal GRM for workers (and contractors) in Appendix C of the ESMS.</li> </ul>
PS 4: Community Health, Safety and Security	<ul style="list-style-type: none"> <li>Recognises that project activities, equipment and infrastructure can bring benefits to communities including employment, services, and opportunities for economic development. However, the project can also increase the potential for community exposure to risks from a development.</li> <li>Where project activities pose risks or adverse impacts on the health and safety of affected communities, the developer is required to make available relevant information (including the details of an Action Plan), in an appropriate form, to affected parties and government authorities so that they can fully understand the nature and extent of these risks.</li> </ul>
PS 5: Land Acquisition and Involuntary Resettlement.	<ul style="list-style-type: none"> <li>In such instances, the developer will undertake extensive consultation and negotiation with affected parties. Such communication will include transparent access to project related information in a timely fashion to enable people to plan for the future. Here, public participation will include the establishment of appropriate representative forums through which resettlement and compensation are discussed. Most of this consultation is part of the Social Impact Assessment (SIA) and Resettlement Action Plan but it should be recognized as a component of the Public Consultation and Disclosure Plan.</li> <li>Although resettlement is always seen as a last resort, this Standard recognizes that involuntary resettlement occurs as a result of projects and refers to both physical and economic displacement as a result of project related land use. Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition which results in their displacement.</li> <li>Consultation shall also take place with host communities.</li> <li>An external grievance mechanism should be established to be consistent with Performance Standard 1 as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host</li> </ul>

Performance Standard	Key Components
	communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> <li>To protect and conserve biodiversity;</li> <li>To maintain the benefits from ecosystem services; and</li> <li>To promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.</li> <li>In cases where construction activities, including excavation, embankment creation and clearing of vegetation lead to direct loss and/or alteration of habitats, these changes, which could lead to species disruption, should be effectively communicated and disclosed to the relevant stakeholders.</li> </ul>
PS 8: Cultural Heritage	<ul style="list-style-type: none"> <li>To protect cultural heritage from the adverse impacts of project activities and support its preservation; and</li> <li>To promote the equitable sharing of benefits from the use of cultural heritage.</li> <li>Development of a Chance Finds Procedure, where in the event a contractor (any worker at any level) discovers an unmarked grave, they will immediately stop work and report it to their immediate supervisor. Then, the EPC Contractor EHS In-Charge will contact the KTZ Project EHS In-Charge who will investigate and excavate the grave in accordance with local procedures, and with licensed CH experts.</li> </ul>

### 2.2.1 IFC STAKEHOLDER ENGAGEMENT HANDBOOK (2007)

The IFC Stakeholder Engagement handbook outlines several requirements and guidelines for companies regarding stakeholder engagement in projects that may have an environmental impact. Here are some key requirements and best practices considered in the development of this SEP:

- **Informed Participation:** Stakeholder engagement should be a continuous, inclusive, and communicative process, aimed at involving those affected in a meaningful way. The process should include providing stakeholders with comprehensive, understandable, and timely information about the project's potential impacts and proposed mitigation measures.
- **Grievance Management:** A structured mechanism should be in place to manage grievances from affected communities effectively. This involves ensuring that the mechanism is accessible, transparent, culturally appropriate, and able to resolve complaints promptly.
- **Stakeholder Involvement in Project Monitoring:** Encouraging participatory monitoring by affected stakeholders, ensuring they are involved in tracking the project's adherence to environmental and social commitments.
- **Regular Reporting and Feedback:** Maintaining regular communication with stakeholders about the project's progress, its impacts, and the effectiveness of mitigation measures. Regular reports should be clear, transparent, and accessible, and should reflect the concerns and suggestions of stakeholders.

## 3. PROJECT STAKEHOLDERS

This section describes the outputs from the stakeholder mapping process, which informed the design of the SEP and is critical to the development of the Project's approach to consultation and communication.

### 3.1 STAKEHOLDER IDENTIFICATION AND ANALYSIS

IFC defines stakeholders as '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 organisations and groups with special interests, the academic community, or other businesses.'<sup>3</sup>

Based on IFC's definition, the Project's stakeholders are defined to include local communities affected by the Project, workers, national and local authorities, neighbouring Projects and non-governmental organisations (if present).

Stakeholder identification for the Project was undertaken during the preparation of the Supplementary ESIA in 2024. The results of the preliminary stakeholder identification are presented below in **Table 3-1**.

The stakeholder list as well as stakeholder analysis and mapping will continue to be updated according to the ongoing receipt of comments and input from stakeholders directed to the Project.

**TABLE 3-1: IDENTIFIED STAKEHOLDERS (CONSTRUCTION PHASE)**

Stakeholder Group	Interest and Role in the Project	Description of Stakeholders
<b>Project-Affected Entities</b>		
Project-Affected Persons	Individuals and/or households impacted (or will be impacted) by physical displacement.	SSIs from January 2025 at Zhetygen station with the Alatau City Land Department indicate that: <ul style="list-style-type: none"><li>• Approximately 22 structures are affected by the Project's land requirements, of which:<ul style="list-style-type: none"><li>◦ 15 were residential structures, but three (3) were not in use (according to residents in the area, some people have moved away due to the Project's land acquisition.</li><li>◦ Seven (7) structures are either bars or small shops.</li></ul></li></ul>
	Individuals and/or households impacted by the Project's land acquisition, construction and operation.  Impacts may include:	Population affected by land acquisition: <ul style="list-style-type: none"><li>• Landowners representing 110 to 155 households</li></ul>

<sup>3</sup> IFC (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, available at: <https://www.ifc.org/en/insights-reports/2000/publications-handbook-stakeholderengagement--wci--1319577185063>, accessed 2 January 2025.

Stakeholder Group	Interest and Role in the Project	Description of Stakeholders
	<ul style="list-style-type: none"> <li>• Economic displacement due to Project land acquisition (loss of or loss of access to agricultural land)</li> <li>◦ Access disruption and, income and livelihood impacts due to land fragmentation and inaccessibility of land plots, in particular cases, where alternate access is not provided.</li> <li>◦ Income and livelihood impacts to land owners left with unviable pieces of land after the land acquisition</li> <li>◦ Temporary loss of income for land lease holders, tenant farmers and workers who are affected by land acquisition</li> <li>• Community health and safety risks, including: <ul style="list-style-type: none"> <li>◦ Nuisance due to construction dust and noise- potentially affecting the resident population, agricultural fields and livestock (especially those grazing in the vicinity of the construction works</li> <li>◦ Increased risk of traffic accidents, loss of livestock and loss of life due to construction vehicles.</li> <li>◦ Construction vehicles causing damage to land when used as access roads.</li> <li>◦ Increased risk of Sexual exploitation and abuse (SEA) and Gender based violence and harassment (GBVH), especially among the young and women, from the local communities.</li> <li>◦ Public and social infrastructure strain.</li> </ul> </li> <li>• Impacts on labour and working conditions</li> <li>◦ Occupational health and safety risks for workers.</li> <li>◦ Accommodation and living conditions on site.</li> </ul>	<ul style="list-style-type: none"> <li>• with land plots partially acquired<sup>4</sup>.</li> <li>• Landowners representing 31 to 50 households with land plots entirely acquired.</li> <li>• Land users representing 33 to 60 households with lands partially acquired.</li> <li>• Land users representing 7 to 15 households with lands completely acquired.</li> <li>• Approximately 100 to 250 workers on acquired lands.</li> <li>• Approximately 15 to 30 settlements<sup>5</sup> affected due to a partial loss of grazing areas.</li> </ul> <p>Other impacted stakeholders:</p> <ul style="list-style-type: none"> <li>• Local communities in settlements along the alignment<sup>6</sup>;</li> <li>• Residents in Alatau City and the rural districts of Zhambyl, Iliy, Karasay and Talgar.</li> <li>• Workers from neighbouring districts and/or other regions of Kazakhstan.</li> </ul>
Local communities near the Almaty Bypass railway line and quarries	<ul style="list-style-type: none"> <li>• Local communities have a vested interest in the Project as it may provide employment and economic opportunities to the nearby communities, or it could also disrupt the amount of available grazing land.</li> </ul>	<ul style="list-style-type: none"> <li>• People residing in immediate proximity to the Almaty Bypass railway (residents of settlements in Zhambyl, Karasay, Talgar, Iliy and Alatau City);</li> </ul>

<sup>4</sup> Includes the 10 new identified land plots in Alatau City requiring acquisition, as per January 2025 site visit and consultations with KTZ and Alatau City Land Department.

<sup>5</sup> The settlements presented here may refer to villages, towns or micro districts. It refers to whichever is the lowest administrative unit.

<sup>6</sup> Project's SAoI for the Supplementary ESIA has been defined as the Zhambyl District, the Iliy District, the Karasay District, Alatau City and the Talgar District within the Almaty Region in Kazakhstan.

Stakeholder Group	Interest and Role in the Project	Description of Stakeholders
Vulnerable community groups potentially affected by the Project	<ul style="list-style-type: none"> <li>Vulnerable Groups are interested in the Project as they want to be fairly involved in the discussions related to the Project, and are more susceptible to any negative impacts arising from the Project activities.</li> </ul>	<ul style="list-style-type: none"> <li>Local residents who may experience impacts more severely, and may also be difficult to engage due to age, disability, education level, social or economic status, etc.</li> </ul>
Workers and employees (internal stakeholders), either directly employed on the project or working for contractors/sub-contractors (external stakeholders) on the Project	<ul style="list-style-type: none"> <li>Workers and employees, either directly employed on the project or working for contractors/subcontractors on the Project have a high interest in the Project because their source of income depends on the success and proper execution of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Workers and employees, either directly employed on the project at full-time or project basis, and/or working for contractors/sub-contractors on the Project.</li> </ul>
Project-Affected Entities (commercial)	<ul style="list-style-type: none"> <li>Economic displacement (loss of agricultural land or access to agricultural land) due to Project land acquisition</li> </ul>	<ul style="list-style-type: none"> <li>8 to 10 land-owning commercial entities with lands completely acquired.</li> <li>1 to 5 land-owning commercial entities with lands partially acquired.</li> <li>7 to 9 commercial entities facing complete loss of access to leased land.</li> <li>3 to 5 commercial entities facing partial loss of access to leased land.</li> </ul>
<b>Government Agencies and Related Organisations</b>		
Central Government Agencies	<ul style="list-style-type: none"> <li>Government agencies responsible for environmental approvals for the Project, and relevant Ministries responsible for making technical decisions/assessment and recommendations on the development of the Project, ensuring that all technical, social, financial and legal requirements are strictly met.</li> <li>Government agencies responsible for construction permits and licenses, land acquisition and resettlement, and other activities required for the Project development and operation.</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Energy and Environmental Protection</li> <li>Ministry of Finance</li> <li>Ministry of Industry and Infrastructure Development</li> </ul>
Regional and District Akimats	<ul style="list-style-type: none"> <li>Regional akimats coordinate with national authorities and district akimats to ensure that the project aligns with broader regional development goals.</li> <li>Both regional and district akimats are involved in land acquisition processes.</li> <li>District akimats often handle local permits and regulatory approvals</li> </ul>	<ul style="list-style-type: none"> <li>Regional Akimat of Almaty</li> <li>District Akimats of Alatau City, Zhambyl District, Iliy District, Talgar District and Karasay District</li> </ul>



Stakeholder Group	Interest and Role in the Project	Description of Stakeholders
	necessary for construction and operation phases. They ensure that the project complies with local zoning and environmental regulations.	
Other Agencies	<ul style="list-style-type: none"> <li>Cultural Heritage licensed experts, such as Margulan Institute of Archeology, have a high interest in the project as there are identified burial mounds in the Project's AoI.</li> </ul>	<ul style="list-style-type: none"> <li>Margulan Institute of Archaeology ("Margulan"), Science Committee of the Ministry of Science and Higher Education</li> </ul>
<b>Other Interested Parties</b>		
Organisations and companies working on the Project, including contractors/subcontractors	The EPC and contractors and subcontractors are directly involved and responsible for the successful implementation and development of the Project.	EPC Contractors including Poligram and Integra, Design developers and design organisations, Project partners and consultants, Suppliers and construction contractors, Shareholders and Lenders.
Non-government organisations and independent experts	Other Non-Government organisations and independent experts can provide feedback which may impact the Project.	Specialised environmental, social, and research organisations, non-government organisations and community organisations (including Community Councils, Council of elders, community informal leaders).
Mass media	Mass media companies provide a platform for which information can be disseminated on.	Printed mass media of regional, district, and municipal level, Television, Internet resources including social media

### 3.2 VULNERABLE GROUPS

Vulnerable groups are defined by the IFC PS as: *"Disadvantaged or vulnerable status may stem from an individual's or group's race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources"*<sup>7</sup>.

This Project proposes to categorise vulnerable groups using the following criteria. While any one of the below would qualify the person or households as vulnerable, if more than one of the below applied, the household would be considered very vulnerable:

- **Economically vulnerable groups:** The minimum wage in Kazakhstan is 85,000 tenge (USD\$160) per month, as of January 2024. Economically vulnerable group are considered

<sup>7</sup> IFC (2012). IFC Performance Standards on Environmental and Social Sustainability. Retrieved from: <https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-performance-standards.pdf> [Accessed in August 2024]

those under low-income households, those making between 1 to 2 million tengge (USD\$1,935 to USD\$3,794) per annum;

- **Elderly people and / or households with only elderly members (over 63 years of age for men and 58 years for women):** This vulnerable group includes those older than retirement age (see ages for men and women above), with no young working-age members in the household;
- **People with mental or physical disabilities** (e.g., albinism or mentally disabled people): This vulnerable group includes those with disabilities that affects their ability to gain an income;
- **Female headed households:** This vulnerable group includes female headed households or widows.

Indigenous peoples (IPs) are generally considered part of the vulnerable people group. However, as noted in the National EIA and consultation with the District Akimats, there are no Indigenous Peoples located within the Projects AoI. Therefore, IPs are excluded from the Stakeholder Group Categorisation at this stage.

### 3.3 STAKEHOLDER MAPPING

The following matrix (**Figure 3-1**) will be used to map the stakeholders. The Stakeholder Matrix is a dynamic tool that should be periodically updated as and when interest and/or influences of each stakeholder changes over the Project implementation period. Depending on the level of interest and influence of the stakeholder, it is placed into one of the four quadrants. Each group of stakeholders requires different engagement strategies. This is a preliminary mapping and can be revised as the Project progresses into later stages of stakeholder engagement. The main factors taken into account when identifying stakeholders are:

- Their attitude towards the project as measured by the extent to which the stakeholder will “back” (support) or “block” (resist);
- Their influence/power or ability to influence. This may be measured according to their potential to influence others, derived from their position or resource power, or may be their actual influence derived from their credibility as a leader or expert; and
- Their interest in the Project as measured by the extent to which they will be active or passive.

Key stakeholders will be then categorised and analysed according to their influence and interest in the Project and classified into four (4) groups to determine management actions: Informing, Collaborating, Monitoring and Engaging (**Figure 3-1**). Depending on the results of the mapping, engagement strategies will be suggested specifically to each group. This includes:

- **Collaborate**/manage closely (high power/high interest): The stakeholders should be managed closely. This includes regular engagement and consultation;
- **Inform**/Keep satisfied (high power/low interest): The stakeholders should be engaged and consulted on issues of interest;
- **Engage**/Keep informed (low power/high interest): The stakeholders should be kept informed and should be consulted on key interest areas; and

- **Monitor** (low power/low interest): The stakeholders should be monitored and kept informed about the Project (e.g., through factsheets and media notifications).

At this stage (Construction and Resettlement Implementation), ERM envisages that the stakeholders most likely to be impacted or to be most influential in terms of the successful delivery of the Project are: Figure 3-1: **Stakeholder Mapping Matrix**

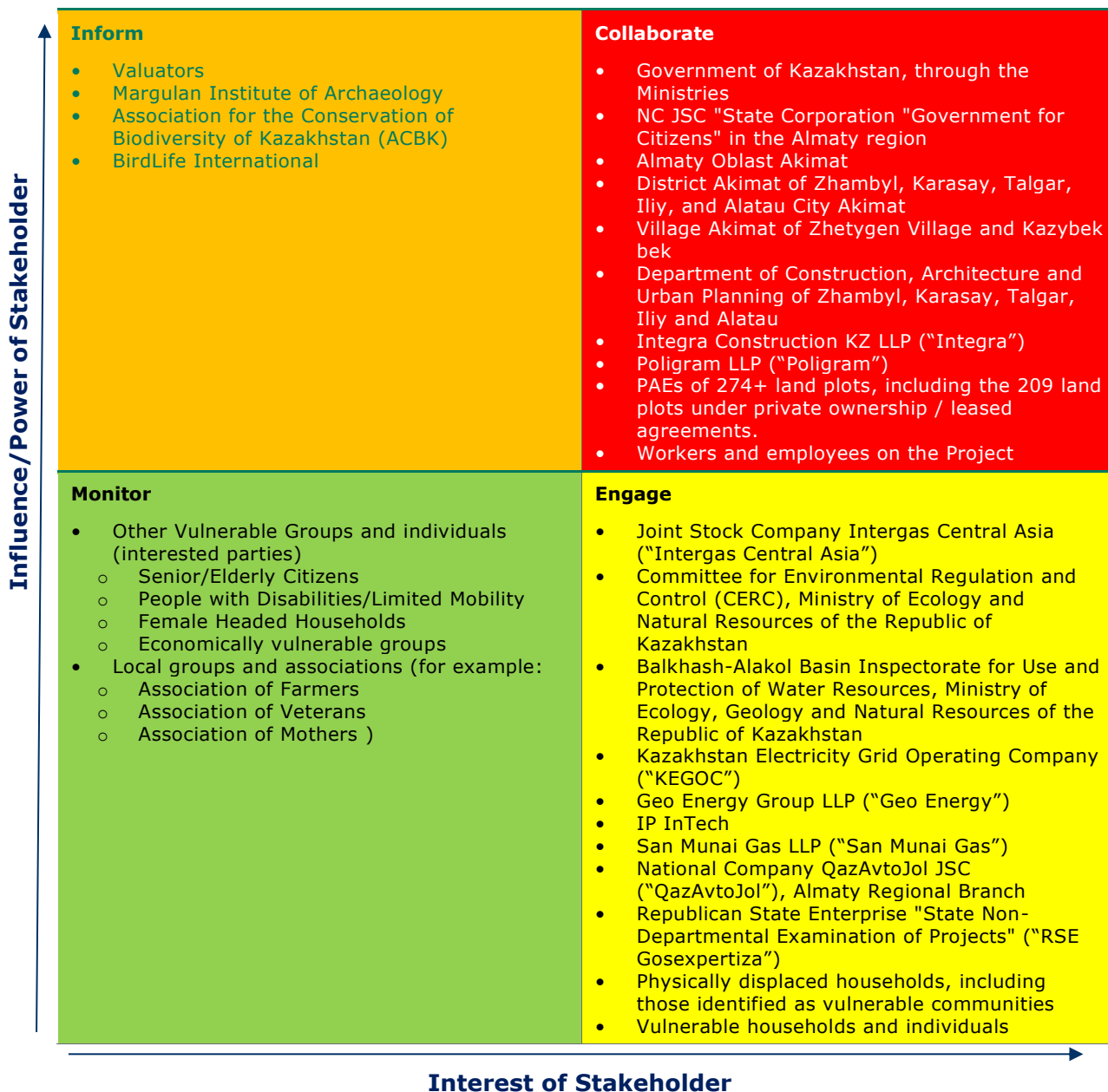


FIGURE 3-1: STAKEHOLDER MAPPING MATRIX

### 3.4 STAKEHOLDER CATEGORIES

**Table 3-2** provides further details on the potential stakeholders' interests, influence and attitude towards the Project.

TABLE 3-2: ANALYSIS OF STAKEHOLDER CATEGORIES

Potential Stakeholder Groups	Stakeholder Category Profile		Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)
Affected Parties						
Landowners, users (organisations and individuals) who will be affected by permanent or temporary acquisition of land for the Project	Landowner	Entire acquisition (land)	<b>High Interest</b>  Landowners on private land have a high interest in the Project and want to be fairly compensated for their involuntary resettlement caused by compulsory land procurement by the state for projects of exceptional cases, such as the Bypass Project.  Landowners affected by entire, partial and/or in-use residential structures affected all have a high interest in the project as their livelihoods are directly impacted.	<b>High Influence</b>  Landowners have a high influence on the construction timeline of the project. Landowners can reject the valuation of the land plot and associated assets on the land, and raise their dispute in court, delaying the overall process of involuntary land procurement by the state and the transfer of ownership from the landowner to the state.	<b>Negative to Neutral</b>  <u>31 SSIs conducted between October – December 2024</u> According to the 31 households engaged in the Semi-Structured Interviews (SSIs), four (4) out of the 31 respondents (12.9%), responded that they had engaged the court in the process of land acquisition as they did not agree with the initial valuation of compensation for their land. Out of the four (4) respondents, two (2) responded had the verdicts in their favour for the new valuation, whereas the other 2 respondents were still awaiting the announcement of the verdict.  On the other hand, 15 out of 31 households (48.38%) of respondents mentioned that their compensation had already been complete, with only 1 respondent claiming they had grievances towards the project, but did not wish to further elaborate.  Perceptions between landowners vary (from negative, neutral and positive) towards supporting the Project and/or having grievances.  <u>18 SSIs conducted in January 2025</u> ERM conducted 18 SSIs with landowners of 19 affected land plots, as facilitated by the Alatau Land Department. Additionally, ERM conducted a door-to-door survey of the affected structures marked by KTZ in red paint to speak to residents whose houses or structures were marked by KTZ. The number of affected land plots around Zhetygen station is reportedly 49, as per the list sent by KTZ to Alatau City. However, Alatau City have informed ERM that the number could be more, as no cadastral map and up-to-date project boundaries have been made available to date.  A total of 22 structures on site marked for acquisition were surveyed, of which 13 were residential and nine (9) were barns or shops.	<b>Collaborate</b>  Consultation on resettlement and livelihood restoration  Ongoing consultation and negotiation with affected households, organisations and institutions.  Identify opportunities to restore livelihood for affected households. Details are provided in the LRP and RF.  GRM implementation.
		Partial acquisition (land)				
	Physically displaced	<b>High Interest</b>  Physically displaced landowners on private land have high interest in the Project as their livelihoods may be permanently impacted by the Project.	<b>High Influence</b>  Landowners who will be physically displaced have a high influence on the construction timeline of the project. They can reject the valuation of the land plot and associated assets on the land, and raise their dispute in court, delaying the overall process of involuntary land procurement by the	<b>Negative to Neutral</b>  In the event of a loss of the primary residence, owners may be physically and may or may not be economically displaced, deepening their negative impact associated with the land acquisition. This could lead to negative perceptions towards the project. Landowners who are not physically or economically dependent on the acquisition of land		

Potential Stakeholder Groups	Stakeholder Category Profile		Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)
				state and the transfer of ownership from the landowner to the state.	<p>where their residential structure is located might have a more neutral perception towards the project.</p> <p>The January 2025 site visit indicated that the number of affected land plots around Zhetygen station is reportedly 49, as per the list sent by KTZ to Alatau City. However, Alatau City have informed ERM that the number could be more, as no cadastral map and up-to-date project boundaries have been made available to date.</p> <p>A total of 22 structures on site marked for acquisition were surveyed, of which 13 were residential and 9 were barns or shops.</p> <p>Approximately 11 to 13 households are likely to be physically displaced.</p>	
	User (Tenant/ Lease holder)	Complete loss of access	<b>High Interest</b>	<b>Low Influence</b>	<b>Negative to Neutral</b>	
		Partial loss of access	<p>Users (Tenant/ Lease holders) have a high interest in the Project as the acquisition of the land for the Project has a direct impact on their livelihoods.</p> <p>Users (Tenant/ Lease holders) affected by entire, partial and/or in-use residential structures affected all have a high interest in the project as their livelihoods are directly impacted.</p>	<p>Users (Tenant/ Lease holders) have a low influence in the Project as during the compulsory procurement of the land by the state, tenants must return the land to the owners and leaseholders must return the land to the government. Assets on the land will be fully compensated, and users can request for the government’s support in requesting for a replacement plot, or support in the reconfiguration of the land plot.</p>	<p>Tenants or Leaseholders may have a neutral perception of the project, as the regulations state when the governments acquire land and a replacement plot is provided, the replacement plot must be of equal or higher value than the original plot of land. In addition, they may have a neutral perception if their livelihoods are not entirely dependent on the loss of access, and if they are provided a better quality of land in a location with better accessibility and overall surrounding infrastructure.</p> <p>Tenants or leaseholders may have a negative perception if they have built their lives around the current location, and moving to another location may not be so desirable as the conditions for the quality of land for land-based users might be impacted.</p>	
		Physically displaced	<b>High Interest</b>	<b>Low Influence</b>	<b>Negative to Neutral</b>	
		<p>Physically displaced land users tenants/on leased land have high interest in the Project as their livelihoods may be permanently impacted by the Project.</p>	<p>Users (Tenant/ Lease holders) who will be physically displaced have a low influence in the Project as during the compulsory procurement of the land by the state, tenants who physically reside on the land plot must return the land to the owners and leaseholders must return the land to the government.</p>	<p>In the event of a loss of the primary residence, Tenants or Leaseholders may be physically and may or may not be economically displaced, deepening their negative impact associated with the land acquisition. This could lead to negative perceptions towards the project. Tenants or Leaseholders who are not physically or economically dependent on the acquisition of land where their residential structure is located might have a more neutral perception towards the project.</p>		

Potential Stakeholder Groups	Stakeholder Category Profile		Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)
	Commercial Entities that owned the land	Entirely acquired	<b>High Interest</b>  Commercial Entities, such as Joint Stock Companies (JSCs), Limited Liability Partnerships (LLPs) and Private Companies (PCs), have a high interest in the project, as the entire or partially acquisition of land could have a direct impact on their commercial operations.	<b>High Influence</b>  Commercial entities that own land have a high influence on the procurement process and on the Project as if a dispute arises concerning the valuation of compensation for the amount of land acquired, commercial entities can also raise their disputes in court, leading to delays in the procurement process and the overall construction period of the Project.	<b>Negative</b>  Commercial entities that owned the land that is entirely acquired could have negative perceptions to the project as they could have sunk costs towards the investments for commercial agricultural facilities on the owned land.	<b>Collaborate</b>  Ongoing consultation and negotiation to ensure fair and equitable compensation.  GRM implementation
		Partially acquired			<b>Negative to Neutral</b>  Commercial entities that owned land that is being partially acquired could have negative to neutral perceptions on the project, depending on the amount of land that is being acquired.	
	Commercial Entities that utilise the land	Complete loss of access	<b>High Interest</b>  Commercial entities that use the land have a high interest on the Project as the project could have direct implications on their commercial operations.	<b>Low Influence</b>  Commercial entities that use the land on government leased land have a low influence on the project as users on government land have to return their land to the government during compulsory acquisition of state land for state projects.	<b>Negative</b>  Commercial entities that utilise land that is being completely acquired will be forced to relocate their activities or operations, or in case of partial acquisition, could have corresponding decrease in area available for their activities.	<b>Collaborate</b>  Ongoing consultation to ensure replacement land provided by the government is fair and equitable.  GRM implementation
		Partial loss of access				
	Workers on the land that is acquired		<b>High Interest</b>  Workers working on the land that is being fully or partially acquired have a high interest in the project as their livelihoods are predominantly dependent on land to be acquired. Any amount of land that is being acquired, partially or fully, will have a direct impact on their economic livelihoods.	<b>Low Influence</b>  Workers working on the land that is being fully or partially acquired have a low influence on the project. The workers agreements tend to be with the landowners, renters, leaseholders, or commercial entities, and thus their involvement during the land acquisition process is limited as there are no legal requirements to safeguard the workers livelihoods during the land acquisition process, as per the local regulations.	<b>Negative</b>  Workers on land being acquired could have negative perceptions of the Project as they are not entitled to any compensation value during the acquisition of land and their livelihoods could be permanently or temporarily impacted.	<b>Collaborate</b>  Consultation on livelihood restoration  Ongoing consultation and negotiation with affected individuals  Identify opportunities to restore livelihood for affected individuals and to provide transitional support. Details provided in the LRP and RF.
	<b>Local communities near the Almaty Bypass railway line and quarries</b>	Local communities as within the SAoI of the five (5) districts.		<b>High Interest</b>  Local communities near the Almaty Bypass have high interest about the Project as the project is expected to provide employment and economic opportunities to the nearby communities.	<b>Low Influence</b>  Local communities near the Almaty Bypass railway have low influence as they have limited authority/ability to significantly impact the Project development timeline.	<b>Supportive</b>  Local communities near the Almaty Bypass are supportive about the Project as the project is expected to provide employment and economic opportunities to the nearby communities.
<b>Vulnerable Groups (directly impacted)</b>	Economically Marginalised Families		<b>High Interest</b>  Vulnerable Groups have high interest about the Project and want to be fairly involved in the discussions related to the Project.	<b>Low Influence</b>  Although it is considered especially important to fully engage with and consult vulnerable groups, these communities typically have limited influence over the Project.	<b>Neutral</b>  The Project is not considered to have extensive negative impact on vulnerable groups.	<b>Engage</b>  ESIA disclosure and periodic updates on project execution, in a transparent and culturally appropriate manner.  Note that some landowners/ users/ workers on acquired lands may be
	Senior/Elderly Citizens/elderly-only households					
	People with Disabilities/Limited Mobility					



Potential Stakeholder Groups	Stakeholder Category Profile	Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)	
	Female Headed Households	negative impacts arising from the Project activities.	Negative opinions towards the Project or conflicts with these groups are less likely to significantly impede the Project's operations.		vulnerable; any resettlement and/ or livelihoods restoration shall describe differentiated approaches for managing impacts to these communities.  Ongoing consultation and GRM implementation	
<b>Workers and employees on the Project</b>	Workers and employees, either directly employed on the project or working for contractors/sub-contractors on the Project	<b>High Interest</b>  Workers and employees, either directly employed on the project or working for contractors/ subcontractors on the Project have a high interest in the Project because their source of income depends on the success and proper execution of the Project. Workers need for a safe workplace with adequate health and safety provisions. This includes the safety of women, a functioning GRM Reasonable protections for the job with clear processes for hiring and retrenchment.	<b>Low Influence</b>  Workers and employees, either directly employed on the project or working for contractors/ subcontractors on the Project have a low influence on the Project as they are employed by the companies and their roles and responsibilities are limited to their scope of work designated by their supervisors.	<b>Supportive</b>  Workers and employees, either directly employed on the project or working for contractors/ subcontractors on the Project have a supportive perception towards the Project as they want to be hired and contribute their ability to work, in exchange for income and an improvement on their personal livelihoods.	<b>Collaborate</b>  Active engagement with all direct and indirect employees to ensure that Project is conducted safely and that all employees’ concerns / grievances are addressed adequately.	
Other Interested Parties						
<b>Regional and District Akimats</b>	Almaty Oblast Regional Akimat	<b>High Interest</b>  Almaty Regional Akimat has a high interest in the Project as it will bring economic opportunities, boost regional competitiveness through the form of international trade, and positively contribute to the national economic development of Kazakhstan.	<b>High Influence</b>  Almaty Regional Akimat has a high influence in the Project as it coordinates on the land acquisition process with all the districts and is involved in the overall reporting and progress on land acquisition.	<b>Supportive</b>  The Almaty Oblast is supportive of the Project as it will alleviate congestion in Almaty City, and create job opportunities for the local communities.  Furthermore, the Project establishes Almaty as a key city within the Middle Corridor, also known as the Trans-Caspian International Transport Route, which connects East Asia to Europe via Central Asia and the Caspian Sea.	<b>Collaborate</b>  Regular engagement and provision of periodic updates of project progress.	
	Zhambyl District Akimat	<b>High Interest</b>  Local Akimats have high interest about the Project and are actively involved in the discussions related to the Project.	<b>High Influence</b>  District Akimats have a high influence on the project as they are the responsible parties for issuing the decrees on land acquisition and notifying the landowners affected by land procurement by the state for the Project.	<b>Supportive</b>  The local Akimats are supportive of the Project as it will alleviate congestion in Almaty City, and create job opportunities for the local communities.	<b>Collaborate</b>  Regular engagement and provision of periodic updates of project progress.  Regular check-ins to identify any potential grievances lodged by communities with the Akimats.	
	Karasay District Akimat					
	Iliy District Akimat	It is envisaged that the Project will provide job opportunities to the communities. In addition, local Akimats are typically focal points for receiving and managing community grievances which can also arise from the Project activities.	Failure to meet expectations and adequately address impacts may result in social unrest and disruptions to the Project's operations. It is imperative to thoroughly involve and consult with the affected communities in all four (4) District Akimats. Negative			
	Talgar District Akimat					
	Alatau City Akimat					
	Kazybek bek Village Akimat					
	Zhetygen Village Akimat					



Potential Stakeholder Groups	Stakeholder Category Profile	Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)
			perceptions of the Project and conflicts with these communities pose substantial risks that could impede the Project's operations.		
<b>Public authorities and regulators</b>	Department of Construction, Architecture and Urban Planning of: <ul style="list-style-type: none"><li>• Zhambyl</li><li>• Iliy</li><li>• Karasay</li><li>• Talgar</li><li>• Alatau</li></ul>	<b>High Interest</b>  The Departments of Construction, Architecture and Urban Planning of the four district Akimats have a high interest in the Project as it will bring economic opportunities to the districts, improve connectivity and accessibility to other districts within Almaty Region, and boost regional competitiveness.	<b>High Influence</b>  The Departments of Construction, Architecture and Urban Planning of the four district Akimats have a high degree of responsibility for oversight on construction projects, urban planning, and architectural development within their respective districts.	<b>Supportive</b>  The listed public authorities and regulators are supportive of the Project as it will bring economic opportunities and improve accessibility to the districts.	<b>Collaborate</b>  Proactive engagement to ensure all required permits have been identified and procured prior to project development and throughout the construction and operational period.  Regular engagement and provision of periodic updates of project progress.
	Committee for Environmental Regulation and Control (CERC), Ministry of Ecology and Natural Resources	<b>High Interest</b>  The listed public authorities and regulators have a high interest in the Project as the increase in accessibility facilitated by the railway development will result in economic opportunities, regional competitiveness through the form of international trade, and positively contribute to the national economic development of Kazakhstan.	<b>High Influence</b>  The listed public authorities and regulators have a high influence in the Project as they are responsible for the approvals, permits, ensuring compliance, and oversight of construction activities related to Project.  Refer to the <b>Supplementary ESIA</b> for a brief description on each authorities' roles.	<b>Supportive</b>  The listed public authorities and regulators are supportive of the Project as it will bring economic opportunities and improve accessibility to the districts.	<b>Engage</b>  Proactive engagement to ensure all required permits have been identified and procured prior to project development and throughout the construction and operational period.  Regular engagement and provision of periodic updates of project progress.
	Balkhash-Alakol Basin Inspectorate for Use and Protection of Water Resources, Ministry of Ecology, Geology and Natural Resources				
	Association for the Conservation of Biodiversity of Kazakhstan (ACBK) - BirdLife International				
	National Company QazAvtoJol JSC ("QazAvtoJol"), Almaty Regional Branch				
	Republican State Enterprise "State Non-Departmental Examination of Projects" ("RSE Gosexpertiza"), Ministry of Industry and Infrastructure Development				
	Margulan Institute of Archaeology ("Margulan"), Science Committee of the Ministry of Science and Higher Education	<b>High Interest</b>  Margulan Institute of Archeology is a leading research institution in the field of studying the ancient and medieval history of Kazakhstan. It is a licensed cultural heritage archaeological institution providing recommendations on the preservation and protection of cultural heritage assets within the country.	<b>High Influence</b>  The institute has high influence in the Project as it provides cultural-heritage expert studies identifying sites, each with their description and geo-referenced location, and provides assessments based on the applicable CH laws.  For example, if Margulan identifies a CH within the RoW, there is a potential for delays to the project.	<b>Neutral</b>  Margulan Institute of Archaeology are neutral towards the Project. They are neither benefitting from, or impacted by the Project.	<b>Inform</b>  Consultation if/ when a chance find is triggered/ identified.

Potential Stakeholder Groups	Stakeholder Category Profile	Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)
		The institute has a high interest in the project as there are identified burial mounds in the Project's AoI.			
	Valuators	<p><b>Medium Interest</b></p> <p>Independent Valuators enter tenders in the District Akimats to evaluate land plots and the associated assets.</p> <p>The valuers have medium interest in the project as they have a responsibility to deliver a land valuation reports to the Akimats.</p>	<p><b>Medium Influence</b></p> <p>Independent Valuators have medium influence on the Project as their assessments determine the value for compensation of the land and associated assets on the land.</p> <p>The valuation determined in the valuation report can be disputed or be used to dispute against previous valuations, and the court's decision on compensation can be based on the valuation established by the valuation reports.</p>	<p><b>Neutral</b></p> <p>The Valuators are neutral towards the Project. They are neither benefitting from/or impacted by the Project.</p>	<p><b>Inform</b></p> <p>Consultation if/ when new land is to be acquired or if grievances are lodged with regard to valuation and compensation packages.</p>
<b>Organisations and personnel within the Project, including contractors/ subcontractors</b>	Integra Construction KZ LLP ("Integra")	<p><b>High Interest</b></p> <p>The project EPC contractor has a high interest in the Project as they are directly involved and responsible for the successful implementation and development of the Project.</p>	<p><b>High Influence</b></p> <p>The project EPC contractor has a high influence because any potential action from them would have the ability to significantly impact the Project activities and timeline.</p>	<p><b>Supportive</b></p> <p>The project EPC contractor is supportive of the Project as they are inherently responsible for successful project execution.</p>	<p><b>Collaborate</b></p> <p>Disclose and consult on construction activities</p> <p>To consult and disclose on a range of activities during construction, including:</p> <ul style="list-style-type: none"> <li>Construction activities and schedule</li> <li>Additional mitigation measures / updated ESMP</li> <li>Community health and safety, workers camp code of conducts, environmental and social management, road access and traffic management</li> <li>Hiring opportunities and practices and local worker training program</li> </ul>
	Poligram LLP ("Poligram")	<b>High Interest</b>	<b>Medium Influence</b>	<b>Supportive</b>	<b>Engage</b>
	Joint Stock Company Intergas Central Asia ("Intergas Central Asia")	The project contractors and subcontractors have a high interest in the Project as these parties are directly involved and responsible for the successful implementation and development of the Project.	The project contractors and subcontractors have medium influence in the project, as the advice that they provide could have the ability to impact the Project activities and timeline.	The project contractors and subcontractors are supportive of the Project as they are inherently responsible for successful project execution.	<p>Disclose and consult on construction activities</p> <p>To consult and disclose on a range of activities during construction, including:</p> <ul style="list-style-type: none"> <li>Construction activities and schedule</li> <li>Additional mitigation measures / updated ESMP</li> <li>Community health and safety, workers camp code of conducts, environmental and social management, road access and traffic management</li> </ul>
	Kazakhstan Electricity Grid Operating Company ("KEGOC")				
	Alatau Zharyk Kompaniyasy ("AZhK JSC")				
	Geo Energy Group LLP ("Geo Energy")				
	San Munai Gas LLP ("San Munai Gas")				

Potential Stakeholder Groups	Stakeholder Category Profile	Interest (Project potential impacts, management roles, etc.)	Power/Influence	Perception/Attitude prior to implementation of ESMP, LRP and RF	Management Actions (Stakeholder management, including disclosure and consultation needs as per PS1 and PS5)	
					<ul style="list-style-type: none"><li>Hiring opportunities and practices and local worker training program</li></ul>	
<b>Non-government organisations and independent experts</b>	Association for the Conservation of Biodiversity in Kazakhstan (ACBK)	<b>Medium Interest</b>  ACBK and BirdLife International have medium interest in the Project as the general ecological landscape is not envisaged to be rich in biodiversity value.	<b>Medium Influence</b>  The organisations may potentially have an ability to raise concerns on public domains regarding biodiversity impacts arising from the project which may cause reputational risk to KTZ.	<b>Neutral</b>  Given the existing biological landscape of the RoW and the immediate vicinity, it is envisaged that the organisations will have a neutral attitude towards the project.	<b>Inform</b>  Regular engagement and provision of periodic updates of project progress.	
	BirdLife International					
	Association of Farmers	<b>High Interest</b>  Association of Farmers have a high interest as some farmers’ lands have been identified for acquisition to facilitate project development.	<b>Medium Influence</b>  The associations of farmers have medium influence because some members lands may be involved in the acquisition process.	<b>Negative</b>  The association of farmers have a negative perception on the project as the association members may include those whose land may need to be acquired for the project development.	<b>Monitor</b>  Monitor any grievances and address accordingly.	
	Association of Veterans Association of Mothers	<b>Low Interest</b>  Association of Farmers, Veterans and Mothers have low influence on the Project as the project does not directly impact them.	<b>Low Influence</b>  The associations of veterans and mothers have a low influence on the project as their actions would not have a significant impact on the overall project.	<b>Neutral</b>  The association of veterans and mothers’ perception is neutral towards the project.		
<b>Vulnerable Groups (indirectly impacted)</b>	Economically Marginalised Families	<b>High Interest</b>  Vulnerable Groups have high interest about the Project and want to be fairly involved in the discussions related to the Project.	<b>Low Influence</b>  Although it is considered especially important to fully engage with and consult vulnerable groups, these communities typically have limited influence over the Project.	<b>Neutral</b>  The Project is not considered to have extensive negative impact on other vulnerable groups.	<b>Monitor</b>  Members of other vulnerable groups indirectly impacted by the project should inform any grievances and address accordingly.	
	Senior/Elderly Citizens/ elderly-only households					
	People with Disabilities/Limited Mobility	They have high interest because they are more susceptible to any negative impacts arising from the Project activities.	Negative opinions towards the Project or conflicts with these groups are less likely to significantly impede the Project's operations.			
	Female Headed Households					

## 4. PAST STAKEHOLDER ENGAGEMENT AND DISCLOSURE

This section outlines the past stakeholder engagements conducted at various times, as mentioned below:

- Prior to the official announcement of the Project,
- During the official announcement,
- As part of the National EIA,
- Consultations with the Lenders, and,
- Consultations conducted by ERM as part of the Supplementary ESIA (including LRP and Resettlement Framework (RF) development).

### 4.1 PRIOR TO NATIONAL EIA

#### Overall Public Engagements

Through consultations with KTZ, it is understood that landowners in the area of influence were aware of potential land acquisition since 2012 when the Project was first announced<sup>8</sup>. However, since the initial conceptualization of the project, various design options were considered, with four main options that would have had different socio-economic implications, as outlined in the Supplementary ESIA.

The construction of the Almaty Bypass was formally announced by the Kazakhstan government, through the Minister of Industry and Infrastructure Development, Kairbek Uskenbayev, in March 2022.

#### Cultural Heritage Engagements

In 2014, Margulan was engaged as a Cultural Heritage consultant to conduct expert studies on the identification of objects of cultural and historical significance in the area. The studies concluded that there were three (3) objects of significant cultural heritage such as burial mounds of the Iron Age. However, no coordinates of the three (3) objects were stated in the letter, and no information on which option of the alignment the study was conducted in relation to. The letter broadly states that the proposed route of the bypass railway line is near Almaty M1:25 000.

On 27 March 2023, a historical-cultural study was conducted by Antique-KZ. The study concluded that there was historical-cultural heritage site consisting of over 10 mounds and five (5) small ritual sites identified in the area. The study, which was included in the National EIA, has been excluded from the Supplementary ESIA based discussions with the Project Proponent regarding inconsistencies that calls into question its accuracy and reliability.

On 29 October 2024, in a letter No 54/20-480 written by Margulan to KTZ, Margulan concluded that there were no historical or cultural heritage objects the 240m CH survey corridor (120 meters from either side of the rail centreline).

---

<sup>8</sup> Source: IFC's Kazakhstan Almaty Railway Bypass Project, Pre-Concept Mission, 15 - 19 April 2024, Back to Office Report.

## 4.2 OFFICIAL ANNOUNCEMENT, NATIONAL EIA AND CONSULTATIONS WITH THE LENDERS

Information of the following engagements pertaining to the public hearings was extracted from the minutes of the hearings made available to ERM, and information pertaining to the process of land acquisition was summarised based on the IFC Land Acquisition Gap Analysis Report, authored by an independent Consultant, and with the final version submitted on 5 September 2024.

### Official Public Announcement

The construction of the railway officially commenced on 14 November 2023, when the Government of the Republic of Kazakhstan, led by Prime Minister, announced the initiation of the Almaty Bypass project. On 15 November 2023, the construction of the Almaty Bypass was officially issued online by KTZ<sup>9</sup>.

The Project, part of a larger railway network and strategy by KTZ, has also been broadcasted by international financial institutions, such as the Multilateral Investment Guarantee Agency (MIGA) and by the World Bank<sup>10</sup>.

### Public Hearings

On 27 December 2023, a regional public hearing meeting for the National EIA occurred, with a subsequent meeting for the approval of the National EIA on 30 January 2024. Only 12 local residents representing local villages attended.

Based on the meeting minutes representatives from InTech and Poligram attended the hearings and presented the Project details, key environmental and social considerations and possible impacts and addressed the questions posed by audience members.

From January- April 2024 several public consultations led by KTZ, representatives from the Contractors (InTech and Poligram) and District Akimat representatives took place. Each public consultation had a different representation of stakeholders. Details about the public consultation were communicated in both Kazakh and Russian via the Unified Environmental Portal, the official website of the local executive authority, or the state body responsible for the development (<https://ecoportal.kz/>) Details of the public hearings include:

- **29 January 2024 in Zhambyl District:** The outcome of the meeting indicated strong support for the proposed project, with 31 participants in favour, and none against or abstaining from the vote.
- **30 January 2024 in Iliy District:** The outcome of the meeting was positive, with 12 votes in favour and none against or abstaining from the vote. Key questions were raised regarding demolition concerns. The Akim of Zhetygen village raised a question about how the population would be affected. This concern was addressed by a representative designer from Poligram who stated that the project was in the second stage of development and were open to discussing all issues transparently.

---

<sup>9</sup> Kazakhstan Temir Zholy. (n.d.). *Construction of railway bypassing Almaty has begun*. Kazakhstan Temir Zholy. Retrieved 13 February 2025, from <https://railways.kz/en/news/construction-railway-bypassing-almaty-has-begun/>

<sup>10</sup> Multilateral Investment Guarantee Agency. (n.d.). *KTZ Railway project 1*. Multilateral Investment Guarantee Agency. Retrieved 13 February 2025, from <https://www.miga.org/project/ktz-railway-project-1>

- **9 April 2024 in Kazybek Bek:** The minutes indicate that there was a total of 38 participants in the hearing and included presentations by “InTech”. Key points of the hearings included:
  - **Construction Timeline:** Questions were asked regarding when the construction would start and its expected duration.
  - **Gas Pipeline Agreement:** There were concerns on whether the construction of the railway alignment would have effects on other international projects, such as the China-Central Asia China Gas Pipeline.
  - **Permit Acquisition:** Participants expressed concerns about obtaining necessary construction permits, especially in the context of pending agreements related to the gas pipeline.
  - **Environmental Concerns:** Some participants sought reassurance regarding environmental safeguards and mitigation strategies, though the specifics of these concerns were not detailed.
- **10 April 2024 in Iliy District:** The minutes of the hearing suggest that participants raised several concerns regarding the project, including:
  - **Questions on Route Alignment and Land Expropriation:** Concerns were raised about the railway's alignment and land acquisition issues, with requests for clearer explanations from project representatives.
  - **Compensation for Tree Cutting:** Participants expressed concerns regarding the lack of clarity on compensation for tree removal and the specifics of the planned replanting efforts.
  - **Call for Further Engagement:** The Akim of the Zhetygen Rural District suggested follow-up meetings with project representatives to discuss the ecological impacts and route details in more depth.
  - **General Support with Specific Concerns:** While there was overall support for the project, attendees sought reassurances about environmental safeguards and the adequacy of the mitigation strategies proposed.
- **10 April 2024 in Talgar District:** The hearing had an overall of 10 attendees who expressed favour during the meeting and supportive of the Project’s proposals. The key concern was the **management of wastewater** and the absence of designated wastewater accumulation facilities in the Talgar District.

### Land Acquisition

The overall process on land acquisition begun in May 2023. Since then, several public decree announcements from the various District Akimats of Almaty Oblast were issued. These include (in chronological order):

- Decree #231 dated 2 May 2023, issued by Karasay district Akimat
- Decree #145 dated 19 May 2023, issued by Zhambyl district Akimat
- Decree #05-230 dated 30 May 2023, issued by Talgar district Akimat
- Decree #305 dated 1 June 2023, issued by Iliy district Akimat



- Decree #266 dated 28 Sep 2023, issued by Zhambyl district Akimat
- Decree #03-91 dated 12 March 2024, issued by Talgar district Akimat
- Decree # 96 dated 12 December 2024, issued by Alatau City Akimat

Between June 2023 to January 2024, several engagements between the local executive Akimats, valuers, the landowners/users, the Court, the standing commission at the local representative body of the landowner/user, local executive bodies and entity that registers rights to land/real estate were held.

The purpose of the engagements was to notify landowners/users of the land acquisition, conduct valuation studies, reach a consensus on the agreement/disagreement on the valuation with the landowner/user, reconsider in case of disagreement, and, if failure to reach an agreement, file a claim for involuntary acquisition, with the possibility to appeal to the lawsuit.

Upon the court's decision, the local executive bodies, the standing commission at the local representative body of the landowner/user, executive agencies and body that registered rights to land/real estate would engage for the agreement preparations and submission of documents confirming payment of compensation.

The site visit by ERM, from 28 October – 8 November 2024 confirmed that not all land acquisition was fully complete. It was noted that land acquisition was complete for Zhambyl District (6 land plots), however Talgar District (32 out of 46 land plots acquired), Iliy District (26 out of 112 land plots acquired) and Karasay District (1 out of 5 acquired) were still on-going, for several reasons. Consultations with the Iliy Akimat representative indicated that land acquisition was expected to be completed by January 2025. Additional details are available in the LRP.

Discussions between KTZ and the Akimat of Alatau on 4 December 2024, after the site visit, indicated the possibility of additional land needed for acquisition around Zhetygen station, in Alatau City. Although this has been planned, as indicated by KTZ, no formal decrees have been issued yet. On January 2025, the ERM team received a list of the potentially affected land plots in Zhetygen station by KTZ, and, with the support from the Alatau City Land Department, had conducted 18 SSIs in the area.

### 4.3 STAKEHOLDER ENGAGEMENT UNDERTAKEN FOR SUPPLEMENTARY ESIA DEVELOPMENT

ERM was engaged to develop the Supplementary ESIA from early September 2024 onwards. The subsequent information details the stakeholder engagement and activities conducted in preparation for the Supplementary ESIA.

#### 4.3.1 RECONNAISSANCE AND BIODIVERSITY VISIT: 23 SEPTEMBER – 04 OCTOBER 2024

Between 23 September to 4 October 2024, a reconnaissance visit was carried out by selected ERM personnel. Key stakeholder meetings focused on the eastern part of the Almaty Bypass – specifically the Zhetygen bridge construction sites along the Kapchagay Traffic Road and Area 525, as well as construction points from 508 to 176 (Zhamanqum). Key observations were shared with KTZ, Integra and/or Poligram at the closure of the reconnaissance visit. A summary of the conducted activities included:



- Visited sections of the alignment accompanied by KTZ, Integra and/or Poligram.
- Initial meetings with Almaty Regional Land Committee and Ilyi District to obtain overall status of land acquisition, information clarifications and request for data.
- Discussions on mitigation and ongoing EHS and biodiversity safeguards with KTZ, Integra and Poligram.
- Meetings with Association for the Conservation of Biodiversity of Kazakhstan (ACBK).

#### 4.3.2 ENVIRONMENT AND SOCIAL CONSULTATIONS: 28 OCTOBER – 05 DECEMBER 2024

Between 28 October to 5 December 2024, environment and consultations, as well as social surveys, were conducted with key stakeholders including: KTZ, EPC Contractors Poligram and Integra, District Akimat representatives, Cultural Heritage representatives and valuers. Key informant interviews (KII), focus group discussions (FGDs), community consultations and semi-structured interviews (SSI) with project affected entities were done at household level.

SSIs for Project Affected Entities (PAEs) were conducted for Zhambyl, Karasay and Ilyi District<sup>11</sup>. The key social and environmental activities that were conducted can be summarised as:

- **Key Stakeholder Meetings:**
  - Meetings with KTZ and EPC Contractors Poligram and Integra for further clarification and request of pending data.
  - Meetings with District Akimats overall land acquisition status update and data clarifications.
- **KII, FGDs, and SSIs:**
  - Key Informant Interviews with KTZ, EPC Contractors Poligram and Integra, District Akimat representatives, Cultural Heritage representatives, Valuers, subcontractors (including PTCM and KCT).
  - Focus Group Discussions and Community Consultations with women, farmers, lessees of government land, farm workers, informal users such as shepherd, railway workers, and workers in labour accommodation.
  - Semi-structured interviews with project affected entities, including women headed households, women respondents, people in the vulnerable groups category (including handicapped/physically disabled adult, senior citizen 60+ year, widow, low-income households).
- **Ad-hoc Individual and Community Consultations Along the Alignment:**
  - Visit of the entire alignment by sections (including quarries, rivers, labour accommodation, and other ad-hoc social consultations) accompanied by KTZ, Integra and/or Poligram.
  - Cultural Heritage survey along key section of the alignment identified in the National EIA.

---

<sup>11</sup> Difficulties in coordinating SSI's in the Talgar District were encountered. A letter by the Almaty Region Transport Department to the Akimat of Talgar District requesting support to organise FGDs and help coordinate SSIs was obtained. However, due to social tensions unrelated to the Project in Talgar District and the transfer of some of the land plots from Talgar District to Alatau District, no SSI's in the Talgar District have occurred as of 16 January 2025.

- **Engagement with the Akimats**

The four (4) Districts Akimats of Talgar, Iliy, Karasay and Zhambyl were engaged extensively throughout the site visit. Later, on 4 December 2024, the Alatau City land department was also consulted, over a conference call, on the issue of land acquisition. These engagements provided greater understanding of the specific land acquisition process that was conducted within each district and allowed for clarifications based on the information received prior to the site visit. Gaps related to the land plots where acquisition was still on-going, as well as the additional 40 land plots that had been identified in Iliy District, as mentioned in the IFC Gap Analysis Report, were clarified<sup>12</sup>.

ERM conducted KIIs with the Akimats to gain a better understanding of the socio-economic conditions of the districts and the most common challenges faced by the community, including the owners and users directly affected by the Project. The District Akimats assisted in arranging SSIs with the identified households and KIIs with the Valuers of Talgar and Zhambyl District.

Based on the engagements, the Akimats are the key entity between the Project and the community, advising the Project on specific district requirements and concerns to be considered (i.e. locations of cattle crossing), and the entity where community members can receive information regarding the Project and raise grievances

- **Project Grievance Redressal Mechanism**

Through stakeholder consultations, it was established that KTZ has a formal grievance mechanism at a corporate level but lacks a grievance mechanism at a project level. Further information on existing and proposed grievance mechanisms can be found in **Section 5.5**.

#### 4.3.2.1 KII, FGDS AND SSIS FOR LRP PREPARATION

In preparation for the Livelihood Restoration Plan (LRP), KIIs, FGDS and Community Consultations and SSIs were conducted during the second field visit from 28 October – 5 December 2024. The following subsection highlights the key findings from the stakeholder engagements that supplemented the development of the LRP. For detailed information on the outcome of the consultations, please refer to the LRP.

A total of 31 respondents representing 40 land plots were interviewed. Out of these:

- 19 (61%) were individual, private owners (of which six (6) were female owners);
- 1 (3%) co-owned their land plot with a joint-owner;
- 4 (13%) were leaseholders;
- and 7 (22.5%) were registered companies
  - (4 (12%) were private lands and 3 (10%) were using leased lands).

#### **Vulnerable PAEs**

Through the KIIs with District Akimats, ERM identified vulnerable groups to include:

- People with disabilities;

---

<sup>12</sup> The IFC Gap Analysis Report highlighted that an additional 40 land plots in Iliy were identified for acquisition, however at the time of receipt of the Report on 5 September 2024, the status of acquisition and compensation was still unclear.

- Households with only post-retirement age members;
- Women-headed households; and
- Low-income households (defined as an annual household income of 1 to 2 million tenge or USD\$1,880 to USD\$3,760).

Of the identified vulnerable groups, ERM was able to interview:

- One (1) woman headed-households,
- One (1) household where an adult-member of working age was physically disabled, and
- One (1) household comprising of a senior citizen only.

ERM was unable to interview any low-income households (defined as annual household income of between 1 to 2 million tenge per year).

### **Grievance Mechanism**

- Five (5) of the surveyed respondents accessed a grievance mechanism. The grievances were filed either through judicial proceedings (court cases), e-Otinish (electronic online governmental system for filing complaints), District Akimats or a combination of them.
- 18 of the surveyed respondents did not access any grievance mechanism, with eight (8) or about 45% of them citing that they do not find the mechanisms reliable.
- Only one (1) of the respondents was not aware of there being any channels to file grievances.

### **4.3.3 PHYSICAL DISPLACEMENT CONSULTATIONS AND FINAL DATA COLLECTION: 15 – 24 JANUARY 2025**

Based on the consultations with Alatau City land department on 4 December 2024 and pending information for the completion of the Supplementary ESIA and the ESMS, an additional site visit was undertaken from 15 – 24 January 2025. The site visit included 18 high-level SSIs representing 19 cadastral land plots. The purpose of the site visit included:

- Confirmation of the Project boundaries, especially at Kazybek Bek Station and Zhetygen Station.
- Confirmation of list of affected land plots along the entire alignment, including stations (there have been several versions and iterations of the Project boundary at Zhetygen Station / Alatau City, impacting the numbers of affected land plots potentially impacted with physical displacement).
- Clarification on stage of acquisition at Alatau City.
- Clarification on pending information required for the Supplementary ESIA and ESMS.

## **5. STAKEHOLDER ENGAGEMENT STRATEGIES FOR FUTURE PROJECT PHASES**

ESIA engagement activities, including ESMP and LRP activities, require that communication between local residents, KTZ, District Akimats and other relevant stakeholders such as EPC and contractors are conducted frequently, in order for feedback to be received from the stakeholders on the Project impacts and proposed mitigation and implementation measures of the Supplementary ESIA and LRP.

## 5.1 STRATEGIES FOR INFORMATION DISCLOSURE, COMMUNICATION AND CONSULTATIONS

Continued stakeholder engagement and disclosure activities should happen at the following levels:

### General level

General disclosures should involve dissemination of information on environmental and social impacts at various levels, including to the KTZ Headquarter level, Akimats at Village//City/District and Oblast level, PAEs through FGDs, Community leaders, NGOs, Government agencies, EPC and Contractors.

### Community level

Individual and community stakeholder engagement and disclosure should happen at district and settlement Akimat levels, so that information, compensation/LR registration (for LR programmes) and grievances related to ESMP implementation and/or LRP implementation can be resolved at individual level.

### Project site level

Disclosure of stakeholder OHS engagements and grievance mechanisms for workers should happen at project site level.

## 5.2 DISCLOSURE OF THIS SUPPLEMENTARY ESIA

One of the most important aspects of any consultation or engagement process is the process of information disclosure. This process is not only part of regulatory requirements but also a requirement of the investors / lenders in the project. The process of information disclosure can be undertaken in two manners, either voluntary disclosure or disclosure as part of the regulatory requirements. While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the Project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner, at the appropriate time.

### 5.2.1 TIMELINE OF SUPPLEMENTARY ESIA DISCLOSURE

This disclosure of relevant plans is to be carried out in a manner which would make the information available to the community in an accessible and timely manner.

The Supplementary ESIA is expected to be disclosed to the public within 60 calendar days after the final approval of the documents by the Lenders. It is recommended that the Supplementary ESIA be disclosed via publication on the KTZ website and/or through relevant media and social media channels.

### 5.2.2 INFORMATION DISCLOSURE OF SUPPLEMENTARY ESIA (SEP-GRM, NTS, LRP-RF, ESMP)

The process of disclosure involves the provisioning of information in an accessible manner (a manner which allows for easy understanding) to the various stakeholders in a project, and at accessible locations. This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information but also allow for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

### 5.2.2.1 STAKEHOLDER ENGAGEMENT PLAN AND GRIEVANCE REDRESSAL MECHANISM

The SEP-GRM shall be disclosed with the stakeholders listed in **Section 5.5**. These include:

- Developer and Implementer of the Project – KTZ
- EPC Contractor – Integra
- Design Engineer – Poligram (and other Contractors)
- Community Liaison Officer (CLO)
- Environmental and Social Management Unit (ESMU)
- Livelihood Restoration Implementation Team (LRIT)

Once the Supplementary ESIA has been approved, and the ESMU and LRIT established, as well as the CLO identified for the Project, KTZ shall organise a meeting with the identified stakeholders to disclose the SEP-GRM. The ESMU, LRIT and CLO, under KTZ, are responsible for disclosing the SEP-GRM to the community stakeholders, and to raise awareness on the GRM procedures.

### 5.2.2.2 NON-TECHNICAL SUMMARY

The NTS shall be translated in both local Kazakh language, Russian language and English and placed in accessible locations for the project-affected people (e.g., settlements, village, city and district level Akimats).

The NTS of the Supplementary ESIA is expected to be disclosed to the public within 30 days (online disclosure) to 60 days (public disclosure at District Akimat level) after the final approval of the documents by the Lenders. Refer to **Section 7.4**.

### 5.2.2.3 LIVELIHOOD RESTORATION PLAN AND RESETTLEMENT FRAMEWORK

All relevant information such as entitlements to livelihood restoration programmes, reimbursement of transaction costs or deduction of depreciation of asset costs, grievance redressal locations, and training opportunities are detailed within the LRP-RF, and should be disclosed to the target stakeholders as early as possible.

Establishment of the LRIT which will oversee the implementation of the LRP-RF is proposed to happen within one month of the disclosure of the Supplementary ESIA. Refer to **Section 7.4**.

### 5.2.2.4 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

All activities which cover E&S initiatives will be covered by the ESMU. The unit will oversee the execution of the ESMP, monitor all the activities within the ESMP, including the management and monitoring plans. The unit will also address emerging issues as they arise, including trends, reviewing nature of grievances and reviewing and monitoring results.

Establishment of the ESMU which will oversee E&S initiatives and the implementation of management and monitoring plans of the ESMP is proposed to happen within one month of the disclosure of the Supplementary ESIA. Refer to **Section 7.4**.

## 5.2.3 ADDITIONAL METHODS OF SUPPLEMENTARY ESIA DISCLOSURE

While undertaking the process of disclosure it is important that the Project and the contractors' employees endeavour to refrain from creating false expectations. When possible, an attempt shall be made to disclose actual numbers, even estimates, wherever available.

Furthermore, the disclosure of the Supplementary ESIA will be gender-sensitive, culturally appropriate, and available in both local Kazakh language, Russian language and English.

### 5.3 STAKEHOLDER ENGAGEMENT STRATEGIES FOR THE PROJECT CONSTRUCTION PHASE (COMMUNITY-LEVEL)

Continued public engagement after the Disclosure Period of the Supplementary ESIA will be the responsibility of KTZ. Stakeholder feedback will be a key component in the final determination of the effectiveness of the mitigation measures and for the overall monitoring of the successful implementation of the ESMP. It is proposed that KTZ regularly update, refine the community liaison activities, and prioritise topics and themes of the consultations, based on feedback and responses from previous engagements. Stakeholder Engagement should be recorded following templates provided in **Appendix A** and **Appendix B**.

During the construction phase, KTZ and the CLO should:

- Conduct regular project updates and progress information for the affected settlements, with the support of the Akimats. The project updates will be made widely available in the respective Akimats and other public places and on the Project Website.
- Regular community meetings and discussions with the local residents in affected settlements, to be planned and performed by KTZ, the Project Manager, the ESMU, the LRIT, the CLO, and the internal monitoring and evaluation coordinator. Meetings with project affected settlements on a periodic basis to maintain engagement with the local population. Date and time of these visits will be announced at least two (2) weeks in advance. The frequency of the visits shall be determined based on local needs in each of the settlements, including the amount of PAEs in these.
- Special meetings for vulnerable groups; e.g. women meetings will be held at village level.

KTZ will continuously work with the ESMU, the LRIT, the EPC and Contractors, KTZ Human Resources (HR) officer and KTZ CLO and document the outcome of meetings on a less regular basis.

### 5.4 STAKEHOLDER ENGAGEMENT STRATEGIES FOR THE PROJECT OPERATION PHASE (COMMUNITY-LEVEL)

During the operational phase of the project, the stakeholders would include KTZ, contractor workers, technicians, (logistics) companies, security personnel, specialists that would undertake inspection of integrity of the railway system, safety requirements, pipelines, underground and OHTLs, drainages, safety auditors, housekeeping staff, maintenance, human resources (HR), EHS and similar managers for management of operations, communities, local authorities, as applicable. Stakeholder Engagement should be recorded following templates provided in **Appendix A** and **Appendix B**.

KTZ will have to continuously work with the ESMU, LRIT, the EPC and Contractors, KTZ HR officer and KTZ CLO and document the outcome of meetings on a less regular basis, as compared to during the construction phase.

Special meetings for vulnerable groups; e.g. women, low-income households, disabled households, and the elderly will continue to be organised by the CLO and held at village levels, as and when necessary.

## 5.5 RESPONSIBLE STAKEHOLDERS FOR SEP IMPLEMENTATION

To manage its engagements with the Project stakeholders and meet the objectives of the SEP, KTZ should ensure that this engagement process is given as much importance as the other Project activities as well as guarantee the availability of certain resources.

For the management of the E&S aspects of the Projects, the main entities responsible include: KTZ, EPC Contractor Integra, Design Engineer Poligram and other contractors, Community Liaison Officer (CLO), Environmental and Social Management Unit (ESMU) and Livelihood Restoration Implementation Team (LRIT).

However, the overall responsibility of implementation of the SEP lies with KTZ, ESMU, LRIT and the CLO, during the construction and operations phases. The institutional setup for the successful implementation of the SEP-GRM is highlighted in

**TABLE 5-1: INSTITUTIONAL SETUP FOR THE IMPLEMENTATION OF THE SEP**

No.	Responsible party	Roles and responsibilities
1	Developer and implementer of the Project – KTZ	<ul style="list-style-type: none"> <li>Carry out the implementation of the SEP, ESMP, LRP and related management plans while meeting all Project obligations.</li> <li>Responsible for day-to-day oversight of the Project</li> <li>Managing communication and engagement with stakeholders within KTZ and external stakeholders with accurate and regular reports.</li> <li>Manage all the stakeholders involved in the Project, including, the Akimats, PAEs, Lenders, contractors and subcontractors, the surrounding community, and others.</li> <li>Overall oversight on the ESMU and the LRIT.</li> <li>Responsible for addressing any complaints and grievances in relation to Project activities.</li> <li>Key information on KTZ's Roles and Responsibilities can be found in the ESMS. The roles and responsibilities are segregated for: <ul style="list-style-type: none"> <li>Managing Director for Construction of KTZ</li> <li>Director of the Branch of "KTZ– Directorate for the Implementation of Large Projects"</li> <li>Deputy Director of the branch of "KTZ – Directorate for the Implementation of Large Projects"</li> <li>Deputy Director for project implementation of the branch of "KTZ" – "Directorate for the Implementation of Large Projects"</li> <li>Chief Manager of the branch of "KTZ – Directorate for the Implementation of Large Projects"</li> <li>KTZ Project EHS In-charge</li> </ul> </li> <li>A KTZ Chief Grievance Officer (Corporate level) is proposed for managing grievances at a corporate level.</li> <li>The KTZ Chief Grievance Officer should be trained to handle GBV-related grievances.</li> </ul>
2	EPC Contractor - Integra	<ul style="list-style-type: none"> <li>Compliance with the implementation of the ESMP</li> <li>Hire skilled EHS personnel and external specialists to support Project activities.</li> <li>Support KTZ's EHS training sessions for all contractor and subcontractor staff involved in the Project, actively engage new workers and disclose of the SEP-GRM process.</li> <li>Compliance with disclosure of ESMS performance reports to KTZ periodically.</li> <li>Practice accident/incident records register, grievance records, environmental monitoring records, employee/staff and worker details, trainings records and other E&amp;S compliance at required intervals for submission to KTZ.</li> <li>More information can be found in the ESMP.</li> </ul>



No.	Responsible party	Roles and responsibilities
3	Design Engineer - Poligram	<ul style="list-style-type: none"> <li>Ensure all environmental and social considerations are integrated into the design and operational phases of the Project.</li> <li>Supervise the implementation of specific mitigation measures outlined in the ESMP, such as pollution control systems, safety measures, and management plans.</li> <li>Provide feedback and reports on design and operational performance concerning environmental and social objectives</li> <li>More information can be found in the ESMP.</li> </ul>
4	Community Liaison Officer (CLO)	<p>The Community Liaison Officer (CLO) plays a vital role in managing communication and engagement between the EPC Contractor and local communities. The responsibilities focus on ensuring transparent dialogue, addressing concerns, and minimising potential social impacts of construction activities.</p> <ul style="list-style-type: none"> <li>Serve as the primary point of contact between the EPC Contractor, KTZ Project team and the local communities.</li> <li>Facilitate regular meetings with community representatives to provide updates on project activities and address concerns.</li> <li>Communicate relevant project information, including timelines, potential impacts, and mitigation measures, to local communities in an accessible manner.</li> <li>Trained to manage GBV-related grievances.</li> <li>Provide advance notice of construction activities that may affect communities, such as road closures, increased traffic, or noise.</li> <li>Manage the GRM by receiving, documenting, and addressing complaints or concerns from community members.</li> <li>Ensure grievances are resolved in a timely and transparent manner and maintain records of all cases for reporting purposes.</li> <li>Act as a mediator to resolve conflicts between the project team and local communities, ensuring fair and equitable outcomes.</li> <li>Escalate unresolved conflicts to the appropriate project personnel or KTZ.</li> <li>Prepare and submit regular reports on community engagement activities, grievances, and resolutions to the EPC Contractor's management and project owner.</li> <li>Maintain accurate records of interactions with communities and any actions taken.</li> <li>Responsible for handling grievances as indicated in the LRP and ESMP and addressing it at the KTZ Almaty PM level or escalating it to KTZ Headquarters in Astana.</li> </ul>
5	Environmental and Social Management Unit (ESMU)	<p>The ESMU, headed by the KTZ Almaty PM, will oversee the implementation the ESMP and collaborate directly with the designated implementation agencies to put the ESMP into action. This unit will coordinate the activities of all stakeholders on the ground and oversee E&amp;S initiatives. The implementation team will consist of the contractors, an environmental specialist, a biodiversity specialist and social specialist.</p> <p>The team will oversee:</p> <ul style="list-style-type: none"> <li>The overall execution of the ESMP.</li> <li>Monitor all activities within the ESMP, including the management and monitoring plans.</li> <li>Address emerging issues as they arise, including reviewing trends and the nature of grievances.</li> <li>Review and evaluate monitoring results.</li> </ul>
6	Livelihood Restoration Implementation Team (LRIT)	<p>The Livelihood Restoration Implementation Team (LRIT) will oversee the implementation of livelihood restoration activities and collaborate directly with the designated implementation agencies to put the LRP into action. This team will coordinate the activities of all stakeholders on the ground and oversee the planned livelihood restoration initiatives. The KTZ LRIT reports directly to the KTZ Headquarters. The team will:</p>

No.	Responsible party	Roles and responsibilities
		<ul style="list-style-type: none"> <li>Oversee the execution of livelihood restoration programs.</li> <li>Monitor all activities within the LRP, including the implementation of livelihood restoration initiatives and engagement with land-affected households and impacted communities.</li> <li>Foster trust among stakeholders.</li> <li>Address emerging issues as they arise, including reviewing trends and the nature of grievances.</li> <li>Review monitoring results.</li> </ul>

## 5.6 STAKEHOLDER ENGAGEMENT PLAN

It is understood that KTZ is currently planning to develop and implement a Stakeholder Engagement Procedure (SEP) for company operations in line with PS1 (ESAP action items)<sup>13</sup>. It is therefore recommended that this SEP considers any plans or activities KTZ may already be undertaking prior to the implementation of this plan. This may include existing communication channels being followed by the stakeholders which led to the Public Hearings, as stated in **Section 4.2**. As stated previously, the SEP shall be treated as a “living document” that will be updated and refined from time to time in lieu with the exact scale and nature of project related activities based on the relevant phase, that is, at its current stage at time of writing, construction phase and operation phases. Overall, the SEP will enable stakeholder engagement to be undertaken in a systematic manner, where designated personnel will implement specific measures to enable the various stakeholder groups to express their individual views, opinions and concerns, grievances, etc., while allowing KTZ to appropriately respond to them in a time bound manner.

The following **Table 5-2** structures the SEP into three (3) main phases, and highlights the stakeholder group’s involvement, their disclosure methodology / details of engagement, their frequency of engagement, and proposed location of engagement:

- **Disclosure, Communication and Consultations:** To occur during all stages of the Project, and to include stakeholder engagement at general level, individual and community level, and project-site level.
- **Construction Phase:** To occur during the construction phase of the Project, and to include stakeholder engagement at all levels, with a focus on individual and community level through the implementation of the LRP and RF and community level and project-site level for the implementation of the ESMPs and GM.
- **Operations Phase:** To occur during the operations phase of the Project, and to include stakeholder engagement at all levels, including on individual and community level through the implementation of the ESMPs, and to a lesser extent, the implementation of the remaining parts of the LRP and RF, if necessary.

<sup>13</sup> As per World Bank Group MIGA website. Multilateral Investment Guarantee Agency (MIGA). (n.d.). *KTZ Railway Project*. MIGA. Retrieved from <https://www.miga.org/project/ktz-railway-project-0>

TABLE 5-2: STAKEHOLDER ENGAGEMENT PLAN

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
<b>Disclosure, Communication and Consultations</b>					
Project Information Disclosure	All stakeholders	<p>Disclosure of information about construction progress in local language. Installation of informational boards near construction sites and local crossings, which include:</p> <ul style="list-style-type: none"> <li>Schematic map of construction area.</li> <li>Timeframe/timelines for construction completion.</li> <li>Person/entity responsible for construction operations including contact details.</li> <li>Information about accessing GRM.</li> <li>Consultation meetings, which include occasional Focus Group Discussions (FGDs) with each identified stakeholder to capture their inputs on the project.</li> </ul>	<p>Once, post disclosure of the ESIA-ESMP, NTS, LRP and RF, SEP-GRM, and set up of the relevant KTZ employees responsible for the implementation of the ESMPs, including the CLO.</p> <p>Once every three (3) months</p> <p>As per demand or request from specific stakeholders</p>	<p>KTZ website District level Akimats Regional Oblast Akimat</p>	<p>Information disclosures shall be undertaken in Russian and/or Kazakh, depending on the context.</p> <p>All Project timelines and timeframes shall be planned and shared with accuracy, as much as feasible.</p> <p>All proceedings must be recorded in writing and in video as much as feasible. Photographs must be documented.</p>
Disclosure of Management Plans	<p>Landowners Land users Community members Vulnerable groups Akimats Relevant Ministries NGOs / CBOs</p>	<p>Disclosure of technical management plans such as the Supplementary ESIA, ESMP, SEP and internal/external GRM that the project develops. Other plans including the Community Development Plan, Environmental Social Management Plan (ESMP), findings of the Rapid Cumulative Impact Assessment (RCIA), Livelihood Restoration Plan (LRP), Resettlement Framework (RF) including potential impacts and corresponding management strategies.</p> <p>Disclosures to be undertaken by way of meetings with each stakeholder group,</p>	<p>Once, post the completion and disclosure of the ESIA-ESMP.</p>	<p>District level Akimats Regional Oblast Akimat</p>	<p>Disclosure events will be designed as drop-in sessions for all stakeholder groups wanting answers to specific questions.</p> <p>Multiple Project representatives should be present during the disclosure meetings to ensure attendees are getting most of the session.</p> <p>Disclosure sessions should cover specific topics that are pertinent to mitigation</p>

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		and combined stakeholder group meetings, as deemed relevant.			measures and benefits to each stakeholder group. Disclosure session of LRP shall be specific to the PAEs and shall adhere to the requirements of the LRP.
Implementation of Grievance Redressal Mechanism (GRM)	All stakeholders	<p>Community information sessions. Worker information sessions. Displaying telephone lines and numbers for recording grievances. Setting up grievance boxes at key designated locations along the alignment:</p> <ul style="list-style-type: none"> <li>• Kazybek Bek Station</li> <li>• Zhetygen Station</li> <li>• Sorbulak Station</li> <li>• Moyinkum Station</li> <li>• Zhana Arna Station</li> <li>• District Akimat, Village Akimat, and Alatau City Akimat levels</li> </ul> <p>Publicising through newspapers and local media regarding the grievance committee and details of committee members.</p>	<p>Immediately upon disclosure of Supplementary ESIA-ESMP.</p> <p>Across entire phase.</p>	Project site	<p>All grievances must be recorded and timelines for resolution should be adhered to. Grievances that are not resolved, shall be escalated in a timely manner. Internal and external grievance committees shall be set up.</p>
Sharing of Information on Local Employment Opportunities	Local community Vulnerable groups	<p>It is to be noted that railway construction and infrastructure development are technical and domain specific. Engagement on local employment and contracting opportunities at site level, acknowledging that construction is near completion, wherever it is feasible to engage service providers in unskilled or non-technical work. The contractors/vendors to be selected based on specific skill level and cost</p>	Once, post the completion and disclosure of the Supplementary ESIA-ESMP.	District level Akimats	Information on employment opportunities shall be provided with the help of the local labour office, including details on the required skill sets.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		criteria, depending on the need by KTZ or the ECP. Information to be shared via local newspapers, media channels, and notices in the local labour office.			
Sharing of information on Community Health, Safety and Security (included in the ESMS)	Local community residing in the Project impact area Vulnerable groups	Consultation with local community to understand their concerns, raise awareness of risks and opportunities and identify solutions for issues related to: <ul style="list-style-type: none"> <li>In-flux of labour construction workers.</li> <li>Access disruption to roads.</li> <li>Noise disturbance.</li> <li>Other issues or grievances</li> </ul> The local community should also be informed about the GRM for the Project. Consultations shall be undertaken via individual meetings with stakeholders.	Once, post the completion and disclosure of the Supplementary ESIA-ESMP.  Once every three (3) months  As per local needs of the community	District level Akimats	Consultations with stakeholders on health, safety and security shall be an ongoing process.
Sharing of information Occupational Health & Safety (included in the ESMS)	Contractors, sub-contractors and workers	Meetings and Toolbox talks to provide briefings on the tasks to be completed and the standards to be followed, for quality control and health and safety protection from potential hazards such as increased traffic, as well as dust and sand flying from carriers.	Upon selection	Project office	All toolbox talks shall have an attendance sheet signed by workers that have participated. Personal Protective Equipment (PPE) shall be provided by the Project. KTZ holds the ultimate responsibility on OHS matters.
<b>Construction Phase</b>					
Announcements and information related to	Local communities NGOs / CBOs	Provide stakeholders, particularly receptors such as health institutions, schools, etc., with information on construction activities, potential impacts and disturbances such as:	Ongoing, every month	District Akimats	Project related information to stakeholders should be provided on an ongoing basis.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
construction activities	Local journalists / media Social infrastructure – schools, health institutions, religious organisations	<ul style="list-style-type: none"> <li>• Movement of vehicles</li> <li>• Air and water quality and noise disturbance</li> <li>• Other issues or grievances</li> </ul> <p>Announcements to be undertaken through local newspapers and media, newsletters and notices to District Akimat offices.</p>			
Sharing of information on Community Health, Safety and Security (included in the ESMS)	Local community residing in the Project impact area Vulnerable groups	<p>Consultation with local community to understand their concerns, raise awareness of risks and opportunities and identify solutions for issues related to:</p> <ul style="list-style-type: none"> <li>• In-flux of labour construction workers.</li> <li>• Access disruption to roads.</li> <li>• Noise disturbance.</li> <li>• Other issues or grievances</li> </ul> <p>The local community should also be informed about the GRM for the project. Consultations shall be undertaken via individual meetings with stakeholders.</p>	<p>Once, post the completion and disclosure of the Supplementary ESIA-ESMP.</p> <p>Once every three (3) months</p> <p>As per local needs of the community</p>	District level Akimats	Consultations with stakeholders on health, safety and security shall be an ongoing process.
Selection of Contractors and Equipment Suppliers	KTZ Integra Contractors and equipment suppliers	<p>The contractor / vendor selection and commercial approval process is prepared by the KTZ procurement and approved by the head of procurement.</p> <p>An evaluation form shall be put in place to ensure that the vendor complies with all applicable laws covering environment, safety, labour rights including decent work conditions and remuneration, human rights (including child labour, forced or compulsory labour, non-discrimination).</p>	Immediately upon disclosure of Supplementary ESIA-ESMP.	KTZ Headquarter	Contractors and suppliers shall adhere to national and international standards requirements.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		<p>The form also checks if there has been any non-compliances, notices or fines by the regulator covering these aspects in the last few years. The Procurement head in tandem with the Human Resources will be primarily responsible for undertaking the procedures outlined for Contractor Selection and will be primarily responsible for undertaking the following:</p> <ul style="list-style-type: none"> <li>• A potential list of contractors that are reputed in the selected field of service will be developed by the regional Human Resources team.</li> <li>• An initial document request list to be sent to the contractors to obtain the requisite documents required to fill out the Contractor Screening Checklist.</li> </ul> <p>The Contractor / Supplier Screening Checklist to then be filled out after thorough documentary review and any information gaps may be filled out based on the information provided orally by the contractor.</p> <p>Thereafter, an evaluation of the contractor to be carried out based on their environmental and social (E&amp;S) performance including Environment, Health and Safety &amp; Sustainability (EHS&amp;S) competency of contractor, EHS policy and procedures, track record etc. A background check of the contractor is also going to be carried out through public domain and contacting past clients to identify any reputational red flag issues.</p>			



Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		Thereafter, the contractor / supplier that ranks high in their E&S performance and cost considerations will be selected.			
Sharing of information on Occupational Health & Safety	Contractors, sub-contractors and workers	Meetings and Toolbox talks to provide briefings on the tasks to be completed and the standards to be followed, for quality control and health and safety protection from potential hazards such as increased traffic, as well as dust and sand flying from carriers.	Daily, during construction	Site office	All toolbox talks shall have an attendance sheet signed by workers that have participated. PPE shall be provided by the Project. KTZ holds the ultimate responsibility on OHS matters.
Gender sensitisation programmes for contractual workers	Contractors, sub-contractors and workers	If contractual workers are engaged for project construction, or workers from the other villages are involved, training should be provided on required lawful conduct in local community and they should be apprised of potential legal consequences for failure to comply with law. Training should also cover workplace harassment prevention.	Immediately upon disclosure of ESIA-ESMP, and on-going every six (6) months	Site office	Sensitisation programmes for contractual workers shall be on an ongoing basis and shall include topics such as gender sensitisation, sensitisation of the local community culture and norms, dos and don'ts.
Awareness programmes and sensitisation campaigns for workers on communicable diseases	Contractors, sub-contractors and workers	If migrant workers (including workers travelling from other counties) are engaged, awareness programmes and sensitization campaigns on communicable diseases such as HIV/AIDS and other STDs, to be conducted for workers at the project site.	Immediately upon disclosure of ESIA-ESMP, and on-going every six (6) months	Workers' camp	Sensitisation programmes on communicable diseases shall be ongoing. Attendance and training records to be maintained by the contractors. However, ultimate responsibility is held by the KTZ.
Reporting to the public on social, environmental,	All stakeholders	Report on environmental, social, health and safety performance to be uploaded to project website and printed copies to be distributed among local community.	Once a year	Project office and community level	Reports shall be endorsed and signed by the Project Head and any other relevant official as deemed necessary.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
health and safety performance and implementation of the action plans and grievance procedure.		Report summaries shall be published in local newspaper. Details of grievance procedures and committee members shall be provided in every report. Pamphlets of good case studies, which indicate grievance resolution shall be published.			Reports shall be made accessible to all stakeholders at the Project office.
Implementation of Livelihood Restoration Plan (LRP)	KTZ (Headquarter and site-level PM), including the LRIT, the Livelihood Restoration Specialist, the CLO District level Akimats and Regional level Akimats All PAEs	<p>Disclosure activities will happen on two levels:</p> <p><b><u>1. General level</u></b> General disclosure will involve dissemination of information on livelihood restoration options to the PAEs, Akimats, community leaders, NGOs, government agencies and all other stakeholders.</p> <ol style="list-style-type: none"> <li>1. KTZ,</li> <li>2. District Akimats Land Representatives, Almaty Regional Oblast,</li> <li>3. Members of the government, including, but not limited to representatives from the Ministry of Finance.</li> <li>4. Focus Groups, which could include the sample PAEs that were present for the SSIs</li> </ol> <p><b><u>2. Individual level and Community level</u></b> Individual disclosure will involve engagement with individual PAEs so that the livelihood interventions address the specific needs of each household.</p>	<p>Immediately upon disclosure of Supplementary ESIA-ESMP.</p> <p>On-going engagements at General level for FGDs and at individual level to address specific livelihood interventions for each household / PAE.</p>	<p>For General level: KTZ Headquarter or KTZ Almaty Office</p> <p>For individual level: District, City or Village Akimat or at an agreed upon location by the stakeholders.</p>	<p>Once the Land Acquisition Compensation Status Report is approved, endorsed and signed off by KTZ and the LRP Implementation team, confirming the number of affected entities (those who have received compensation, those yet to receive, and users without legal titles to land but who are eligible for compensation, the engagement for PAEs for retrospective compensation (where applicable) or compensation, and for selection of LR programmes with entitlement matrix can be provided to all PAEs.</p> <p>All LRP documentation must be recorded and timelines for resolution, including cash reimbursements of transaction costs and depreciation costs, if any, for those already compensated, and timelines of</p>

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		5. Individual face-to-face meetings with each Project Affected Entity to discuss the eligibility and entitlements matrix, outline the final set of livelihood restoration measures included in the LRP, and provide updates on the status of the project and construction schedule.			compensation for those yet to be compensated.
Environmental Social Management Plan (ESMP)	KTZ (Headquarter and site-level PM), including the ESMP Implementation Team, the Community Liaison Officer District level Akimats and Regional level Akimats All PAEs	Internal and external communications are carried out through the following communications: printed publications on paper and electronic media (bulletins and incident reports, news (information) bulletins on industrial safety, safety minutes), training sessions and videos, publications in industry publications and the media (information stands and corners), correspondence, direct and telephone contacts, meetings and meetings for collective discussion of environmental and social incidents/accidents, as well as ways to prevent them, round table with business partners (contractors). KTZ has also developed a HSE mobile application designed to enhance safety and operational efficiency within the workplace.	Immediately upon disclosure of Supplementary ESIA-ESMP.  Reviewed and updated accordingly every six (6) months or in the event of changes in the construction of the Project or its external environment (e.g., business or internal requirements, applicable laws and regulations, applicable standards etc.), whichever is earlier.	District level Akimats Regional Oblast Akimat Project office and community level	The ESMP is a guiding document for KTZ, Integra and any other contractors for the remainder of the construction phase and for the operations phase and is intended to ensure that the <i>Project Activities</i> at the <i>Project Sites and Facilities</i> are controlled and operated in line with the <i>Project Standards</i> .
<b>Operations Phase</b>					
Informing about upcoming maintenance and repair work	Local community residing in the project impact area	Provide local community with updated information on project progress and any upcoming maintenance and repair work through pamphlets and local media / newspapers.	Across entire phase	Project office and site office	Intimating stakeholders about any repair and maintenance work shall be a practice and shall be undertaken well in advance to the maintenance and repair works.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
Sharing of information on Community Health, Safety and Security (included in the ESMS)	Local community residing in the Project impact area Vulnerable groups	Consultation with local community to understand their concerns, raise awareness of risks and opportunities and identify solutions for issues related to: <ul style="list-style-type: none"> <li>In-flux of labour construction workers.</li> <li>Access disruption to roads.</li> <li>Noise disturbance.</li> <li>Other issues or grievances</li> </ul> The local community should also be informed about the GRM for the project. Consultations shall be undertaken via individual meetings with stakeholders.	Once, post the completion and disclosure of the Supplementary ESIA-ESMP. Once every three (3) months As per local needs of the community	District level Akimats	Consultations with stakeholders on health, safety and security shall be an ongoing process.
Gender sensitisation programmes for contractual workers	Contractors, sub-contractors and workers	If contractual workers are engaged for project operations, or workers from other areas are involved, training should be provided on required lawful conduct in local community and they should be apprised of potential legal consequences for failure to comply with law. Training should also cover workplace harassment prevention.	Across entire phase, every six (6) months	Project office and site office	Gender sensitisation shall be an ongoing activity.
Occupational Health & Safety	Contractors, sub-contractors and workers	Meetings and Toolbox talks to provide briefings on the tasks to be completed and the standards to be followed, for quality control and health and safety protection.	Daily, during operational phase	Project office and site office	OHS training shall be an ongoing activity.
Reporting to the public on social, environmental, health and safety performance and	All stakeholders	Report on environmental, social, health and safety performance to be uploaded to project website and printed copies to be distributed among local community. Report summaries shall be published in local newspaper.	Once a year	Project office and community level	Reports shall be endorsed and signed by the Project Head and any other relevant official as deemed necessary. Reports shall be made accessible to all stakeholders at the Project office.

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
implementation of the action plans and grievance procedure.		Details of grievance procedures and committee members shall be provided in every report. Pamphlets of good case studies, which indicate grievance resolution shall be published.			
Implementation of Livelihood Restoration Plan (LRP)	KTZ (Headquarter and site-level PM), including the LRIT, the Livelihood Restoration Specialist, the CLO District level Akimats and Regional level Akimats All PAEs	Continuation of General level meetings between KTZ, District Akimats, Members of Government, FGDs and individual meetings at face-to-face level to discuss eligibility of reimbursements (if any) and LR programmes.	General level for FGDs and at individual level to address specific livelihood interventions for each household / PAE.	For General level: TBC by KTZ and PAEs.  For individual level: District, City or Village Akimat or at an agreed upon location by the stakeholders.	Continuation in the implementation of the LRP to complete the overall compensation for PAEs.
Environmental Social Management Plan (ESMP)	KTZ (Headquarter and site-level PM), including the ESMP Implementation Team, the CLO District level Akimats and Regional level Akimats All PAEs	Internal and external communications are to be continued to be carried out through the following communications: printed publications on paper and electronic media (bulletins and incident reports, news (information) bulletins on industrial safety, safety minutes), training sessions and videos, publications in industry publications and the media (information stands and corners), correspondence, direct and telephone contacts, meetings and meetings for collective discussion of environmental and social incidents/accidents, as well as ways to	Reviewed and updated accordingly every 6 months or in the event of changes in the construction of the Project or its external environment (e.g., business or internal requirements, applicable laws and regulations, applicable standards etc.), whichever is earlier.	District level Akimats Regional Oblast Akimat Project office and community level	Continuation in the implementation of the ESMPs, with KTZ, Integra and the subcontractors to ensure that <i>Project Activities</i> at the <i>Project Sites and Facilities</i> are controlled and operated in line with the <i>Project Standards</i> .

Purpose	Stakeholder Group	Disclosure Methods / Details of Engagement	Frequency of Engagement	Proposed Location of Engagement	Description
		prevent them, round table with business partners (contractors). KTZ has also developed a HSE mobile application designed to enhance safety and operational efficiency within the workplace.			



## 6. PROJECT-LEVEL GRIEVANCE MECHANISM

The Grievance Redress Mechanism (GRM) for the Project is designed to ensure effective receipt, management, and resolution of grievances raised by all project affected persons, community members, and other stakeholders. The GRM described in this SEP takes into account the existing GRM procedures highlighted in the Supplementary ESIA, the proposed GRM in the Livelihood Restoration Plan (LRP), and the grievance mechanisms mentioned in the Environmental Social Management System (ESMS). The CLO and Chief Grievance Officer (KTZ Corporate level) are trained and responsible in handling GBV-related grievances.

### 6.1 OVERVIEW

The grievances raised from the Project are to be addressed at several levels. There are three main levels where grievances can be raised at the KTZ and Project levels. These include, and cater to the following stakeholders:

1. **GRM at Corporate level** / Internal to Employees of KTZ.
2. **GRM at Labour level (Project GRM)**, accessible to Workers, Labourers and Contractors, including Subcontractors and Subcontractor workers. Refer to **Appendix C** for a more detailed GRM for workers, and **Appendix D** for a Labour GRM template.
3. **GRM at Community level (Project GRM)**, accessible to individuals and the community. This will be functional across all Project Phases, broadly stated as below:
  - a. Construction Phase (including LRP and RF Implementation, and ESMP Implementation). Even as the LRP and RF may overlap with the Operations Phase to a small degree, they are included in the Construction phase.
  - b. Operations Phase (including ESMP Implementation).

Refer to **Appendix E** Community GRM template.

Grievances may be raised by any party using the existing government portal (E-Otinish) where all citizens can raise grievances and is not Project specific. People may also use the country's legal system, and the Project GRM described above does not preclude the use of these means.

A schematic representation of the Project GRM (incorporating the existing GRM) is shown in **Figure .**

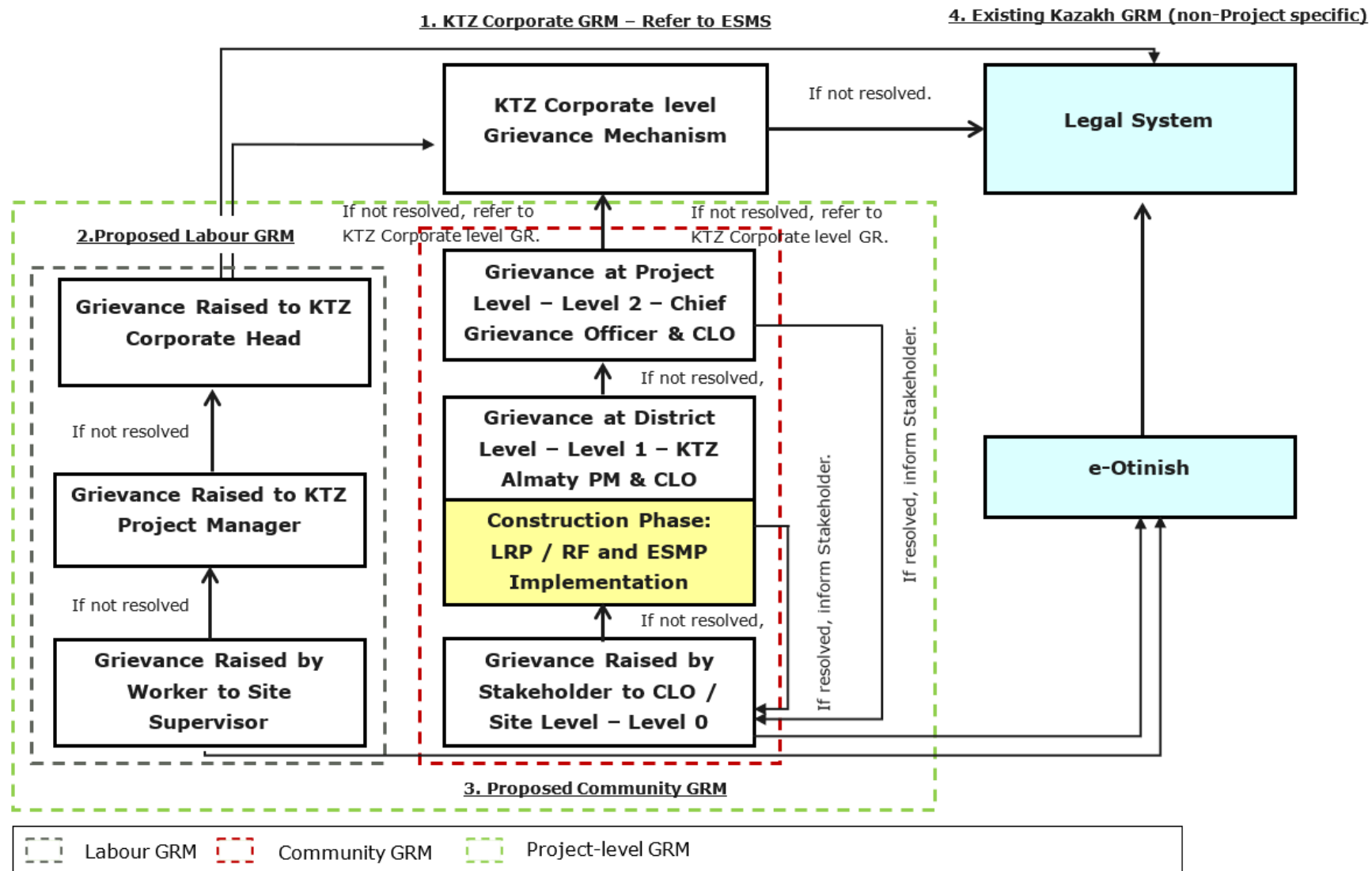


FIGURE 6-1: PROJECT LEVEL GRM (ALONG WITH EXISTING GRM)

### 6.1.1 GRIEVANCE MECHANISM AT A CORPORATE LEVEL

KTZ has a formal grievance redressal mechanism at corporate level, which includes:

- Integrated external and internal stakeholder GRM which allows for reporting of any violations of the Code of conduct, including cases of corruption, discrimination, unethical behaviour and other violations:
  - Toll free hotline: 8-800-080-47-47
  - WhatsApp number: 8-771-191-88-16
- Internet portal managed by KTZ's parent company, Samruk Kazyna<sup>14</sup>
  - Email address: mail@sk-hotline.kz
- Mobile application called "KTZ HSE", which provides an avenue for all workers (including contractor and subcontractor level) to raise grievances, where necessary. The KTZ HSE ISPB is also designed to enhance safety and operational efficiency within the workplace, and as such enables users to prevent potential hazards associated with daily work activities by reporting incidents and near misses. Workers interviewed noted that the app contains the hotlines mentioned in the KTZ website, and as such, is integrated with the overall corporate level GRM with the app providing an alternative option for workers to raise grievances.

Information pertaining to the different routes to raise grievances can be found in the company's website<sup>15</sup>.

KTZ's website also includes a shortcut to "E-Otinish"<sup>16</sup>, which is the official Kazakh government single-window portal for handling all types of inquiries from individuals to legal entities and government departments.

During the SSIs, PAEs cited the use of E-Otinish to raise their grievances on the land acquisition process.

### 6.1.2 GRIEVANCE MECHANISM AT PROJECT LEVEL (LABOUR)

KTZ has an existing mobile application where workers, labourers and contractors hired for all KTZ-related projects can use to raise grievances at corporate level, but no specific GRM at particular Project. This includes:

- Mobile application called "KTZ HSE", which provides an avenue for all workers (including contractor and subcontractor level) to raise grievances, where necessary. The KTZ HSE ISPB is also designed to enhance safety and operational efficiency within the workplace, and as such enables users to prevent potential hazards associated with daily work activities by reporting incidents and near misses. Workers interviewed noted that the app contains the hotlines mentioned in the KTZ website, and as such, is integrated with the overall corporate level GRM with the app providing an alternative option for workers to raise grievances.

The Project proposes a Project-specific Labour GRM for workers, labourers, contractors and subcontractor workers. More information can be found in **Appendix C** "Labour Related Grievance". A Labour Grievance Form template can be found in **Appendix D**.

<sup>14</sup> Source: Samruk Kazyna, KTZ's parent company: <https://sk-hotline.kz/#/>

<sup>15</sup> Source: <https://railways.kz/en/contacts/>

### **Stage 1: First level of grievance redressal**

The site supervisor/direct manager of the worker shall be the point of contact to raise grievances at this level for external project level grievances for workers, labourers and contractors. KTZ Project EHS In-Charge should then respond **within two (2) working days** to the grievance unless an extended period of time is agreed upon by both parties.

### **Stage 2: Second level of grievance redressal**

Senior Management of KTZ (or Chief Manager of the Project) is responsible for handling the appeal and will attempt to resolve the grievance. The appeal, to the senior management of KTZ, must be made **within ten (10) working days** of the original response to the employee grievance.

The Almaty KTZ PM, CLO, EPC and Project Technical Supervisors, and Akimat representatives (if necessary), as well as representative of Women's, Vulnerable Groups, form part of this level's grievance redressal.

### **Stage 3: Third level of grievance redressal**

If the worker remains aggrieved there will be a final level of appeal to the Corporate Head responsible for the employee's function. This appeal must be made to the Corporate Head within ten (10) working days of receipt of the Stage 2 response. This Corporate Head will arrange and hear the appeal with another management representative and respond **within twenty (20) working days**.

If both parties are still not able to handle the grievance, the worker can resort to the Court as a final appeal mechanism.

## **6.1.3 GRIEVANCE MECHANISM AT PROJECT LEVEL (COMMUNITY)**

The following GRM is the proposed Project-level Community GRM. It aims to establish a more project specific GRM and minimize the reliance on other systems. The objectives of the proposed GRM shall include:

- To provide stakeholders with a structured process to raise complaints and concerns.
- To ensure grievances are addressed promptly and transparently.
- To document and analyse grievances to inform project improvements.
- To prevent escalation of issues through proactive conflict resolution.
- To uphold the rights of complainants and prevent retaliation.

This GRM envisages three levels of grievance resolution: Level 0 at the site level, for small matters, grievances may be raised to the Community Liaison Level; Level 1 Grievance Redress Committees (GRC) at District level and Level 2 GRC at the Project and Headquarter level:

#### **GRM Level 0: On-site level**

The grievances at the Community level will be first directed to the CLO, who may be able to resolve the smaller matters. The CLO will be required to follow the process of response and documentation of all grievances received (see **Appendix E**) If not addressed by the CLO, **within 1 week**, the grievance will be escalated to the next level, Level 1.

#### **GRM Level 1: District Level**

Grievances not resolved at the site level will be addressed at the District level. The GRC (Level 1) at the District Akimat / project site level for community grievances will consist of: Almaty KTZ PM, CLO, representative of LRIT and/or ESMU, Akimat representative, and representative of Women's, Vulnerable Groups, and Farm Worker's / Commercial Agriculture's Association where applicable. The GRM at District Akimat level will address grievances at Level 1 **within 1 week from the receipt of the escalation of the grievance** (in other words, within two weeks since the receipt of the grievance from the complainant).

For the management of the E&S aspects of its operations, three entities will be responsible for various activities linked with the Construction and Operations phases of the Project:

- KTZ Almaty Project Manager, including CLO
- EPC and Designated Project Technical Supervisors, including O&M Contractors.
- District (Akimat) Level

The overall responsibility of implementation of the GRM lies with KTZ, in close coordination with contractors, during the construction and operations phases. Suitable personnel should be deputed at site or an existing staff with relevant skills and understanding of E&S issues should be allocated responsibilities to implement the GRM for the Project. Additionally, the Project team at site should be trained on aspects of engagement with the staff deputed/ identified for GRM implementation should be assigned the responsibility of documenting and maintaining records of all grievances during the Project lifecycle and providing updates to the corporate on the same.

Additional staff may be appointed for grievances relating to resettlement (LRP and RF), and the construction phase impacts management. The function of grievance management at the Project level, is expected to span the duration of the Project operations phase.

### **GRM Level 2: Corporate Headquarter Level**

The GRM at Project and Corporate Headquarter level with the KTZ Astana Headquarter Management, and Chief Grievance Officer, and Regional (Oblast) level, if needed will receive grievances that have not been resolved at the lower levels and address them, within the applicable framework, following the documentation, and reporting process. This level will also be responsible for overall and periodic monitoring of grievances (including the ones that have been resolved at the lower levels). The Chief Grievance Officer will facilitate decision-making, and if necessary, meetings will be held with the complainant to examine evidence. The **grievance will be resolved within 1 month** following the referral. In total, the grievance has to be resolved **within 1.5 months (6 weeks)** from the raise of the grievance at Level 0 escalated to Level 2.

The GRC at Corporate Headquarter / Almaty Regional (Oblast) level is composed of the following parties:

- KTZ Astana Headquarters Management, including KTZ HR Manager, and KTZ Almaty PM
- KTZ Chief Grievance Officer (Corporate level), and CLO
- Regional (Oblast) Akimat Level or Akimat representatives, if necessary

While queries and grievances pertaining to the government processes would still need to be accessed through the E-Otinish portal, all other Project matters may be raised through the Project GRM. KTZ would need to undertake disclosure and awareness regarding the Project GRM to make this widely known to Project stakeholders.

#### 6.1.4 GRIEVANCE MECHANISM AT GOVERNMENT LEVEL

KTZ's website also includes a shortcut to "E-Otinish"<sup>17</sup>, which is the official Kazakh government single-window portal for handling all types of inquiries from individuals to legal entities and government departments.

During the SSIs, PAEs cited the use of E-Otinish to raise their grievances on the land acquisition process.

##### **GRM Level 0: On-site level**

Existing GRM tools at corporate level should be used to handle corporate grievances. The existing tools should allow the person raising the grievance to remain anonymous.

##### **GRM Level 1: District Level**

Any concern or grievance that is raised from KTZ employees at the district level should be raised directly to the Almaty KTZ PM or CLO (site level).

##### **GRM Level 2: Corporate Headquarter Level**

Any concern or grievance that is raised from KTZ employees at this level should be addressed directly by the KTZ Headquarters Management.

#### 6.2 PROPOSED GRIEVANCE PROCEDURE FOR THE PROJECT LEVEL COMMUNITY GRM

When developing the proposed Community GRM, KTZ must follow the following procedures:

**Step 1 - Establish Procedures:** KTZ will ensure that the following personnel are identified and responsible for managing grievances:

- Community Liaison Officer (at Community level)
- Chief Grievance Officer (at KTZ Corporate level)

Both the CLO and Chief Grievance Officer (KTZ Corporate level) should be trained to handle GBV-related grievances. KTZ will ensure that the GRM guarantees non-retaliation, confidentiality, and a survivor-centered approach. Should the Complainant wish to remain anonymous at any time, KTZ will ensure that the grievance will still be handled in a professional manner.

KTZ will ensure that procedures, such as, assessment methods, determination of suitable resolution processes, decision-making regarding compensation and proposed settlements (for the LRP), timelines for each stage of the grievance resolution process, and notification protocols for informing complainants about eligibility (for all PAE stakeholders), assessment outcomes, proposed resolutions, and other relevant matters are established.

**Step 2 - Create Resolution Options and Response:** After establishing the procedures, KTZ will develop formal and informal resolution options where grievances can be collected and resolved. These include:

- Establishment of open communication lines to lodge grievances. These options should also allow for the possibility of anonymity:

---

<sup>17</sup> Source: <https://eotinish.kz/ru>



- Grievance boxes placed along with forms to be filled at:
  - Existing Kazybek bek and Zhetygen train stations, and the new proposed Sorbulak, Moyinkum and Zhana-Arna train stations)
  - Akimats office at village/district level
- Phone hotline
  - Dedicated hotline for GBV-related complaints directly to the CLO or Chief Grievance Officer at Corporate level, who are trained to handle GBV-related grievances.
- Email
- Social Media (WhatsApp, and/or Telegram).

Refer to **Appendix D** for Labour Grievance Template Form and **Appendix E** for Community Labour Grievance Template.

Note:

- The grievance mechanism options at corporate level (toll free hotline, WhatsApp number, email address); the Akimats, e-Otinish, and the legal system will still be in place as a form of raising grievances, but we encourage KTZ to promote this Project-specific grievance mechanism.

**Step 3 - Disclose of the Grievance Mechanism:** Once the Grievance Mechanism procedures are developed, KTZ will disclose them through various stakeholder engagement activities.

The establishment of the GRM should take place within one month of the approval of the final documents and the disclosure of the SEP-GRM should take place within 30-60 days of the approval of the final documents (30 days for online disclosure, 60 days for public disclosure at District level). Refer to **Section 7.4** for the SEP-GRM Implementation Schedule. The SEP-GRM will also be disclosed to all stakeholders, including at Corporate level, Labour level and Community level, within 30-60 days of approval of the final documents, and together with the disclosure of the Supplementary ESIA. The CLO, LRIT and ESMU shall be responsible of disclosing the Project SEP-GRM. The grievance process will continue through the life of the Project. One member of the LRIT will manage grievances specifically related to resettlement and construction related issues until the LRP and physical resettlement are delivered, and the construction phase concluded. Overall, the CLO for the Project or a person with this added responsibility should continue through the life of the Project.

The initial outreach will inform the local community, with key information relating to grievance redressals for PAEs already compensated versus PAEs yet to be compensated. Refer to the **Livelihood Restoration Plan** for this disclosure process. It will also set up on-going reminders for the community throughout the Project's construction and operation phases. Information about the GRM will also be regularly shared with direct and indirect workers.

Various communication methods will be used to disseminate information, including printed materials, displays, face-to-face meetings, updates on the website, and disclosure through the Akimats.

**Step 4 - Awareness Campaign for the Grievance Mechanism:** KTZ will conduct a dedicated awareness campaign aimed at the community to explain how to register grievances, provide details about local contact persons or CLOs, discuss the importance of grievance boxes, outline timelines for addressing grievances, and introduce the personnel involved in the redress process. KTZ needs to coordinate closely with the Akimats for awareness raising

campaigns at community level. These campaigns will occur semi-annually, with feedback and suggestions from the community and workers being recognized and potentially implemented to enhance the user-friendliness of the GRM.

#### During the Construction and Resettlement Phase:

KTZ, LRIT, ESMU and the CLO will be responsible for raising awareness of the Community GRM. During the Construction and Resettlement Phase, and once the Land Acquisition Compensation Status Report is concluded, KTZ, along with the LRIT and the CLO, will inform the PAEs who have already been compensated and those who have yet to be compensated on their eligibility for reimbursements/compensation on transaction costs and costs of depreciation of assets (if any), and their eligibility of LR programmes. It is the responsibility of the LRIT and the CLO to ensure correct documentation and documentation of grievances. The ESMU will be responsible for other ES related grievances not necessarily related to land acquisition only.

KTZ and the EPC Contractors will also be responsible for disclosing and raising awareness of the Labour GRM.

#### During the Operations Phase (life of the Project):

During the Operations Phase of the project, less regular awareness raising campaigns for grievance mechanisms are necessary and the frequency of engagement should be in line with what is highlighted in **Table 5-2**.

**Step 5 - Documenting Grievances** (refer to **Appendix E**): Once stakeholders are informed about the mechanism and can access it to submit grievances, KTZ must acknowledge receipt while ensuring the complainant's identity remains confidential. KTZ will routinely check grievance boxes once every week, record and register the grievances according to specified formats, and track them throughout the resolution process to monitor their status and key details. Refer to **Section 6.1.3** for timeline of resolution of grievances at Community level. A grievance log or database will be maintained and safeguarded by the designated CLO at the site and can be used to analyse patterns in grievances and conflicts, community issues, and project operations, allowing for proactive measures to address potential future conflicts.

**Step 6 - Appeal Process:** If a grievance resolution is unsatisfactory to the complainant, they will be provided with an opportunity to appeal, or the grievance can be raised to the next level. KTZ will define the circumstances under which an appeal can be made to ensure social accountability and transparency at every stage.

**Step 7 - Resolution and Follow-Up:** After agreeing on corrective action, it is advisable to document proof of the implemented actions through photographs, documentation, and confirmation from the complainant, which will be filed within the case records. Monitoring and follow-up on the agreed resolution will be conducted to properly close the case. Refer to **Appendix E** for the follow-up form of the Community GRM. KTZ is required to provide regular (quarterly) reports to the public and workers detailing the number of complaints received, resolved, unresolved, and those referred to a third party. Additionally, Lenders must be kept informed with these quarterly reports to assist in the early identification of potential risks.

## 7. MONITORING AND REPORTING

Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism, and for determining broad trends and recurring problems so they can be resolved

proactively before they become points of contention. Monitoring helps identify common or recurrent claims that may require structural solutions or a policy change, and it enables the Project to capture any lessons learned in addressing grievances. Periodic review of internal and external grievances must be carried out at KTZ's internal meetings.

## 7.1 REPORTING

During the lifecycle of the Project, the performance of the SEP and GRM shall be reviewed on a bi-annual basis. For the review of the Project, the designated Project staff will prepare reports to be submitted to the KTZ Project Management team and KTZ Headquarter level, on a quarterly basis. During the operations phase, the reports will be submitted on an annual basis. An example of a reporting format that could be used is presented in **Appendix A**.

## 7.2 TRAINING

Training shall be provided to all the staff at the Project level, for handling of internal stakeholder grievances as per the modalities defined in the GRM, especially to the CLO and Chief Grievance Officer at Corporate level. The training shall also cover understanding of grievance mechanisms, relevant to their exposure and responsibilities for managers, all other employees, contractors, and visitors, which shall include as a minimum:

- Expected behaviours and accepted practices when interacting with workers and stakeholders in order to avoid a grievance in the first instance.
- Routes available for workers to lodge grievances.
- Roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts), and
- Recording and tracking procedures.
- The CLO and Chief Grievance Officer at Corporate level shall be trained to handle GBV-related grievances.

## 7.3 MONITORING INDICATORS

Grievance records will provide background information for regular monitoring, both informal and formal. Depending on the extent of Project impacts and the magnitude of grievances, monitoring measures will vary. Some of the monitoring indicators identified that can be a part of the monitoring mechanism may include:

- Tracking the number of grievances received and resolved (by gender, male/female/non-binary).
- Apart from reviewing each grievance and analysing effectiveness, using complaints to analyse systemic deficiencies.
- Recognise patterns in the grievances the company receives, and how they are being resolved.
- Employees/contractual workers preference/feedback to any of the several channels to submit grievances.
- Whether there is a particular subgroup in the department raising complaints (for example, women/gender non-binary).
- Whether there is a trend in particular groups particular kind of complaints relating to construction, operations or accessibility or any specific issues.

- Effectiveness of different solutions in addressing various categories of grievances.
- Whether there are matters significantly affecting company policy or requiring legal review.
- Issues of cultural appropriateness and transparency.
- Whether the existing system meets requirements established by the Project as well as the expectations of all stakeholders.

Based on all grievances received, registered, documented, and tracked through a central database (excel sheet), periodic reports (quarterly) shall be prepared for reporting to the KTZ Management at Headquarter level. This shall assist in tracking overall trends and patterns in concerns allowing emerging issues to be flagged and understood at an early stage. The statistics on grievance handling and redress are to be included in action plans and annual reporting. Monitoring and reporting also create a base level of information that can be used by the company to report back to employees/contractual workers.

Additionally, any events of significant disturbances, that may have the risk of Project interruptions or hamper the image of the Project, should be reported to the investors / lenders within 24 hours (verbally) and 72 hours (documented report) of the occurrence of the event.

## 7.4 SEP-GRM IMPLEMENTATION SCHEDULE

This section of the report details the implementation process and timeline necessary to oversee the various activities outlined in the SEP. The project is currently in the construction phase, and the implementation of the SEP will be coordinated with ongoing activities to ensure compliance for E&S standards, livelihood restoration and compensation at full-replacement cost for PAEs, and on-going community engagement and disclosure of Project activities.

An indicative timeline for the implementation of the ESMP is presented in below.

**TABLE 7-1: PROPOSED TIMELINE FOR SEP IMPLEMENTATION**

No	Activity	Stakeholder Implementer	Completion Period	Proposed Completion Date
1	Approval of Final SEP Approval of Final ESMP Approval of Final LRP-RF	KTZ	Within 1 month of approval of final documents	March 2025
2	Establishment of the GRM (from SEP-GRM)	KTZ	Within 1 month of approval of final documents	March 2025
3	Disclosure of Supplementary ESIA (Non-Technical Summary) <ul style="list-style-type: none"> <li>• Online Disclosure (30 days)</li> <li>• Public Disclosure (60 days) at District level</li> </ul>	Lenders, KTZ, CLO, Regulatory Authorities, Akimats	Within 30-60 days of approval of final documents	March-April 2025
4	Disclosure of SEP-GRM to stakeholders: <ul style="list-style-type: none"> <li>• Corporate</li> </ul>	KTZ, CLO, Regulatory	Within 30-60 days of approval of	March-April 2025

No	Activity	Stakeholder Implementer	Completion Period	Proposed Completion Date
	<ul style="list-style-type: none"> <li>Labour / Workers / Contractors/ Subcontractors</li> <li>Community</li> </ul>	Authorities, Akimats	final documents	
5	Establishment and Disclosure of the ESMU and LRIT	KTZ	Within 1 month after disclosure of Supplementary ESIA	April-May 2025
6	Hiring/Appointment of KTZ Project Manager in charge of the ESMU and LRIT, and Community Liaison Officer	KTZ	With the establishment of the ESMU and LRIT	April-May 2025
7	Environmental Monitoring	Contractor, Environmental Specialist	Continuous Process, to be carried out all through the activity period. Refer to ESMP for monitoring schedule.	
8	Biodiversity Monitoring	Contractor, Biodiversity Specialist	Continuous Process, to be carried out all through the activity period. Refer to ESMP and BMP for monitoring schedule.	
9	Social Monitoring <ul style="list-style-type: none"> <li>Preparation of Land Acquisition Compensation Status Report.</li> <li>Finalisation of PAEs for LRP implementation</li> <li>Task 2: Delivery of Entitlements</li> <li>Task 3: Implementation of Livelihood Restoration Activities</li> <li>Task 4: Monitoring and Implementation of the Livelihood Restoration Plan</li> </ul>	Social Specialist (Livelihood Restoration Specialist), CLO	Continuous Process, to be carried out all through the activity period. Refer to LRP for implementation schedule.	
10	Program Implementation Monitoring-Quarterly	KTZ, CLO, ESMU, LRIT	Continuous Process, to be carried out all through the activity period for ongoing progress of ESMP and LRP-RF implementation.	
11	Performance of the SEP and GRM shall be reviewed on a semi-annual basis.	KTZ	Six (6) months from the start, and continuous, to be carried out all through the activity period.	
12	Program Implementation Monitoring-Semi-annually	External Monitoring Agency	Continuous Process, to be carried out all through the activity period.	
13	Evaluation of each Training Program	KTZ, CLO, ESMU, LRIT	Continuous Process, to be carried out after completion of each activity and efficacy of the various Programs imparted has to be	

No	Activity	Stakeholder Implementer	Completion Period	Proposed Completion Date
			evaluated by continuous engagement with the PAEs and reported to the KTZ management at quarterly intervals for any intervention or enhancement required.	
14	Follow up of activities	KTZ, CLO, ESMU, LRIT	Continuous Process, to be carried out after completion of each activity.	
15	Mid Term Evaluation	External Monitoring Agency	June 2026 (15 months from the start).	
16	Final Compliance Audit	External Monitoring Agency	March 2028	
17	Preparation of Final Compliance Report	KTZ	March 2028	





APPENDIX A

FORMAT FOR REPORTING STAKEHOLDER  
ENGAGEMENT

FORMAT FOR REPORTING STAKEHOLDER ENGAGEMENT

S. No.	Date	Location	Description of Engagement Activity	Key Stakeholders Present (Names, Designation/Village Name)	Key Takeaways/Decision points
1.					
2.					
3.					
4.					
5.					



## APPENDIX B      SUMMARY OF ALL STAKEHOLDER ENGAGEMENTS

To include a list of all stakeholder engagement (meetings, consultations) undertaken for the ESIA and LRP (and resettlement framework).

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Actions

Photo documentation of each consultation with a list of people participating/present.



## APPENDIX C LABOUR RELATED GRIEVANCE

	<b>Labour Related Grievance</b>	<b>Ver-00</b> <b>DD/MM/YYYY</b>
---	---------------------------------	------------------------------------

### 1. PURPOSE

This procedure serves as one of the components of the ESMS for managing social performance of the construction of the Almaty Railroad Bypass "Project". It prescribes the grievance redressal process and mechanism (informal and formal channels) for handling grievances arising from the workers as categorised:

- Internal Grievances – Employee grievance (including employees hired specifically for the Project)
- External Grievances – Contractor and labour related grievances.

### 2. TYPES OF GRIEVANCES

#### 2.1 INTERNAL GRIEVANCES – EMPLOYEE GRIEVANCE

The likely grievances of direct employees of the Concessionaire may include but not limited to:

- Complaints pertaining to amount of wage, salary, other remuneration or benefits.
- Timely disbursement of remuneration.
- Working condition, health and safety of the employees.
- Unethical behaviour between senior and subordinate employees.
- Discrimination on the basis of caste, creed, language, religion.
- Gender discrimination.
- Workplace harassment.

#### 2.2 EXTERNAL GRIEVANCES – CONTRACTOR AND LABOUR RELATED GRIEVANCES

The workers including local and interstate migrant workers are likely to have grievances related to the following issues, however not limited to:

- Risk to health and safety of the labourers or workers hired by the Contractors.
- Working condition of the labourers.
- Wage discrimination among the labourers.
- Timing of the payments.



- Adequate facilities in the labour camps including water supply and sanitation.
- Workmen's compensation, adequate health facility related issues.
- Unjustified deduction from the wages.
- Minimum wage rates for the labourers.
- Extended working hours.
- Prevention and protection of child labour from hazardous work condition.
- Issue of forced labour.
- Gender discrimination.

### 3. REDRESSAL PROCESS

The grievance redress mechanism is intended as the tool by which a member of staff may formally have a grievance, regarding any condition of their employment and wants to be heard by KTZ management. The aggrieved employee has the right to representation by a trade union representative (if such a union exists), a professional organisation, a staff association or a colleague/ friend. The same will be extended to all contracted workers, including local and interstate migrant workers.

#### 3.1 STAGE 1: FIRST LEVEL OF GRIEVANCE REDRESSAL

- A worker having a grievance should raise the matter with their site supervisor/direct manager as soon as possible either verbally or in writing.
- If the matter itself concerns the worker's site supervisor/direct manager, then the grievance should be escalated to the superior.
- The worker can also log an anonymous complaint through the grievance form and shall be directly managed or handled by the HR & Admin Officer or contractor representative at the site.
- If the Project In Charge is unable to resolve the matter at that time, then a formal written grievance form should be submitted. KTZ Project EHS In-Charge should then respond within two (2) working days to the grievance unless an extended period of time is agreed upon by both parties. The response will give a full written explanation of the manager's decision and who to appeal to if it remains unresolved.

#### 3.2 STAGE 2: SECOND LEVEL OF GRIEVANCE REDRESSAL

- In most instances, KTZ would expect the decision to be final and for the matter to end. However, in some circumstances, the worker may remain aggrieved and can appeal against the decision to the senior management of KTZ (or Chief Manager of the Project) concerned.
- The appeal, to the senior management of KTZ, must be made within ten (10) working days of the original response to the employee grievance. The appeal must be in writing



and contain the original formal grievance form. The senior management of KTZ will attempt to resolve the grievance. A formal response and full explanation will be given in writing, as well the name of the person to whom they can appeal if still aggrieved, within seven (7) working days.

### 3.3 STAGE 3: THIRD LEVEL OF GRIEVANCE REDRESSAL

- If the worker remains aggrieved there will be a final level of appeal to the Corporate Head responsible for the employee's function. This appeal must be made in writing enclosing a copy of the original formal grievance form, to the Corporate Head within ten (10) working days of receipt of the Stage 2 response. This Corporate Head will arrange and hear the appeal with another management representative and respond formally with a full explanation within twenty (20) working days.
- There is no further right of appeal. Where however both parties agree that there would be some merit in referring the matter to a third party for advice, conciliation or arbitration, arrangements will then be made to find a mutually acceptable third party.

## 4. RECORD KEEPING

Grievances and complaints received shall be properly tracked via a grievance log system. Keeping good records helps to track cases, respond to grievances in a timely manner, check the status of complaints and track progress, measure effectiveness, and report on results. A sample tracking format at the minimum should contain and maintain the following grievance related details:

- Grievance Date
- Work Site
- Main job role (i.e., civil works, electrician.)
- Complainant
- Details of the labour issue
- Hearing officer (unless it was submitted anonymously)
- Issue Related to concerned Dept.
- Present Status
- Remarks (Open, Closed, and Pending Status)
- Rationale for grievance closure
- Total time taken to close the grievance

Relevant personnel from respective departments such as Labour, and HR will track the resolution status, coordinate it with the division(s) responsible for corrective actions, and maintain a record of progress (for example- open, pending or closed). An aggregated monthly report on the status of complaints will be maintained by HR & Admin Officer.



## 5. TRAINING

Training shall be provided for labour grievance mechanisms relevant to their exposure and responsibilities for managers, all other project liaising employees, contractors and visitors, which shall include as a minimum:

- Expected behaviours and accepted practices when interacting with employees and stakeholders in order to avoid a grievance in the first instance.
- Routes available for workers (including contractor and subcontractors) to lodge a grievance.
- Roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts).
- Recording and tracking procedures.



## APPENDIX D LABOUR GRIEVANCE MECHANISM FORM

### LABOUR GRIEVANCE REGISTRATION FORM

Project:	Almaty Bypass Project
Date:	

#### FOR OFFICIAL USE ONLY

Method of Grievance						
The Complainant raised grievance through (please tick)	Note/ Letter	Email	Verbal/ Phone	In-Person (with CLO)	Akimat Office	Other (please specify)

#### GRIEVANCE / COMPLAINT FORM

Grievance / Complaint Form		
Location of Grievance Received		Date Received:
Name of Personnel receiving Grievance		Complaint Register Number:
Coordinates of the area subject to Grievance		

#### COMPLAINANT INFORMATION

Complainant Information		
I wish to remain anonymous:		
Name (Surname, First name)		Form of Complaint:  E&S Aspect: OHS: Salary / Remuneration: Safety: Safety (GBVH): Other:
Address:		Telephone/mobile number:





### Complainant Information

Gender

E-mail:

Note: This GRM guarantees non-retaliation, confidentiality, and a survivor-centered approach. Should the Complainant wish to remain anonymous, KTZ ensures that the grievance will still be handled in a professional manner. KTZ will ensure that there will be designated focal point trained to handle Gender-Based Violence and Harassment (GBVH).

### EMPLOYEE DETAILS

#### Grievance / Complaint Form

Employer

I wish to remain anonymous:

Role at Company

I wish to remain anonymous:

### DETAILS OF GRIEVANCE

#### Details of Grievance

Summary of Complaint:

Solution requested by the Complainant:

Name and Signature of the Receiver:

Name and Signature of Complainant:

I wish to remain anonymous:

KTZ ensures that the GRM guarantees non-retaliation, confidentiality, and a survivor-centered approach. Should the Complainant wish to remain anonymous, KTZ ensures that the grievance will still be handled in a professional manner, with no change in the overall process of handling grievances.



#### Details of Grievance

KTZ will ensure that there will be designated focal point trained to handle Gender-Based Violence and Harassment (GBVH).

#### OFFICIAL USE: GRIEVANCE TRACKER

Level	Date	Response Provided	Status
Level 0			
Level 1			
Level 2			

**Note:**

Level: Refers to level where the grievance was received.

Date: Refers to date of receipt / action / escalation / resolution of the grievance.

Response provided: Provides a summary of the action or response / conclusion of the grievance.

Status: Refers to whether the grievance has been escalated to the next level or closed and resolved.



## APPENDIX E COMMUNITY GRIEVANCE REGISTRATION AND FOLLOW-UP FORM

### GRIEVANCE REGISTRATION FORM

Project:	Almaty Bypass Project
Date of First Receipt:	

### FOR OFFICIAL USE ONLY

Method of Grievance						
The Complainant raised grievance through (please tick)	Note/ Letter	Email	Verbal/ Phone	In-Person (with CLO)	Akimat Office	Other (please specify)

### GRIEVANCE / COMPLAINT FORM

Grievance / Complaint Form		
Location of Grievance Received		Date Received:
Name of Personnel receiving Grievance		Complaint Register Number:
Coordinates of the area subject to Grievance		

### LAND ACQUISITION RELATED GRIEVANCE

If Applicable Cadastre number of land plot (if complaint is related to land/lot)	
	I wish to remain anonymous:

### Land ownership details, impacts and complaint

Private land Leased Land	Landowner Land user
Significantly Impacted (>20%) Partially Acquired (<90%) Entirely Acquired (>90%)	Fragmented land (Viable / Unviable) Partial Acquisition Reconfiguration Access Disruption Other
My grievance is related specifically to	Disagreements on: Compensation of land Compensation of assets on land (deduction of depreciation)



## Grievance / Complaint Form

Compensation of land and assets on land

Expenses:

Additional costs incurred

Support:

Additional support from KTZ or Akimats.

## COMPLAINANT INFORMATION

### Complainant Information

I wish to remain anonymous:

Name  
(Surname,  
First  
name)

Form of Complaint:  
E&S Aspect (Dust, Noise, Air, Waste, Traffic, Labour,  
Other):  
Land Acquisition:  
Livelihood Restoration:  
Physical Displacement:  
Safety:  
Safety (GBVH):  
Other:

Address:

Telephone/mobile number:

Gender

E-mail:

Note: This GRM guarantees non-retaliation, confidentiality, and a survivor-centered approach. Should the Complainant wish to remain anonymous, KTZ ensures that the grievance will still be handled in a professional manner. KTZ will ensure that there will be designated focal point trained to handle Gender-Based Violence and Harassment (GBVH).

## DETAILS OF GRIEVANCE

### Details of Grievance

Summary of Complaint:

Solution requested by the Complainant:



## Details of Grievance

Name and Signature of the Receiver:	Name and Signature of Complainant:
	I wish to remain anonymous:

KTZ ensures that the GRM guarantees non-retaliation, confidentiality, and a survivor-centered approach.  
Should the Complainant wish to remain anonymous, KTZ ensures that the grievance will still be handled in a professional manner, with no change in the overall process of handling grievances. KTZ will ensure that there will be designated focal point trained to handle Gender-Based Violence and Harassment (GBVH).

## OFFICIAL USE: GRIEVANCE TRACKER

Level	Date	Response Provided	Status
Level 0			
Level 1			
Level 2			

### Note:

Level: Refers to level where the grievance was received.

Date: Refers to date of receipt / action / escalation / resolution of the grievance.

Response provided: Provides a summary of the action or response / conclusion of the grievance.

Status: Refers to whether the grievance has been escalated to the next level or closed and resolved.



### GRIEVANCE CLOSURE FORM

Project:	Almaty Bypass Project
Date:	

### GRIEVANCE CLOSURE FORM

Complaint Register Number		Please tick
Assessment of the Grievance	Damages to households or livelihoods	
	Environmental and Social	
	Relocation / Displacement / Replacement	
	Other	
Compensation Required:	Yes	
	No	
Result		

Close Out

The Parties (KTZ and Complainant) agree that the proposed resolution is accepted by both Parties, and the Complainant is satisfied with the implementation of the same, and that this grievance case is now resolved and is not considered closed.

Responsible Personnel	Complainant
Date, Name and Signature:	Date, Name and Signature:



ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING  
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	Mozambique
Australia	Netherlands
Belgium	New Zealand
Brazil	Panama
Canada	Peru
China	Poland
Colombia	Portugal
Denmark	Romania
France	Singapore
Germany	South Africa
Hong Kong	South Korea
India	Spain
Indonesia	Switzerland
Ireland	Taiwan
Italy	Thailand
Japan	UAE
Kazakhstan	UK
Kenya	US
Malaysia	Vietnam
Mexico	

**Environmental Resources  
Management (S) Pte Ltd**

20 Collyer Quay, #15-01/02

Singapore 049319

T +65 6324 9636

**[www.erm.com](http://www.erm.com)**