

# GRI CONTENT INDEX

## Statement of use

The ESG-Report of the Kazakhstan branch of Karachaganak Petroleum Operating B.V. was prepared in accordance with the GRI Standards for the period 01.01.2024 – 31.12.2024.

## GRI 1 used

GRI 1: Foundation 2021

## Applicable GRI Sector Standard(s)

GRI 11: Oil and Gas Sector 2021, G4 Oil & Gas 2012

This report has been verified by the Price Waterhouse Coopers LLP (PwC) for compliance with the requirements of the GRI Standards. PwC performed a limited independent assurance of 5 specific disclosures in the Report, namely: 302-1, 303-3, 305-1, 306-3, 403-9; as well as 27 general indicators with the exception of 2-19, 2-20, 2-21.

UNIVERSAL STANDARDS			
No.	Disclosures	Location	Comments to SR / Omissions
<b>GRI 2: General disclosures 2021</b>			
<b>The organization and its reporting practices</b>			
2-1	Organizational details	4, 16, 32, 138, 182 (back cover)	
2-2	Entities included in the organization's sustainability reporting	This Report covers the operations and development projects of the KPO B.V. Branch in Kazakhstan	
2-3	Reporting period, frequency and contact point	4, 182 (back cover)	
2-4	Restatements of information	No restatements of information	
2-5	External assurance	5	
<b>Activities and workers</b>			
2-6	Activities, value chain and other business relationships	16-19, 32, 138, 140	No significant changes
2-7	Employees	71-72	b-iii – KPO does not have employees with non-guaranteed working hours. b-v – KPO does not have part-time employees. e – There were no significant fluctuations in the number of employees during the reporting period.
2-8	Workers who are not employees	83, 87, 71	a – As of 0.15.2025, the number of contractors employees amounted to 16,043 people. b – The number of contractors employees is determined on the basis of passes to the KOGCF facilities; Disclosure of employees turnover by type of contract is not applicable, due to employees turnover includes employees on a direct contract and sending parties' employees (from recruitment agencies). Employees seconded by parent companies are included in the turnover statistics of parent companies.

UNIVERSAL STANDARDS			
No.	Disclosures	Location	Comments to SR / Omissions
<b>Governance</b>			
2-9	Governance structure and composition	32-33, 36	
2-10	Nomination and selection of the highest governance body	34, 32	
2-11	Chair of the highest governance body	32	
2-12	Role of the highest governance body in overseeing the management of impacts	35, 37-38	
2-13	Delegation of responsibility for managing impacts	33-34, 37	
2-14	Role of the highest governance body in sustainability reporting	5	
2-15	Conflicts of interest	42	
2-16	Communication of critical concerns	44, 74, 92	
2-17	Collective knowledge of the highest governance body	5, 36	
2-18	Evaluation of the performance of the highest governance body	34	KPO, as a reporting organization, does not have access to this information. Parent companies report on these issues individually in their sustainability reports.
2-19	Remuneration policies	34, 75-77	a-iii- Remuneration consultants are not engaged.
2-20	Process to determine remuneration	75	
2-21	Annual total compensation ratio	75-76	
<b>Strategy, policies and practices</b>			
2-22	Statement on sustainable development strategy	3, 6	
2-23	Policy commitments	9, 12, 15, 29, 31, 40, 41, 43, 51-52, 56-57, 60, 68, 86, 90-91, 95, 97, 113, 137	
2-24	Embedding policy commitments	40-42, 87, 97, 44	
2-25	Processes to remediate negative impacts	24-26, 44, 87-88, 92	
2-26	Mechanisms for seeking advice and raising concerns	44, 74, 87-88, 92	
2-27	Compliance with laws and regulations	45, 98	There were no fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods that were paid in the reporting period.
2-28	Membership associations	13, 144	KPO is a member of the KAZENERGY association. Business partnerships and associations
<b>Stakeholder engagement</b>			
2-29	Approach to stakeholder engagement	9-10, 12, 29, 57, 93, 98, 141-142, 179-180	
2-30	Collective bargaining agreements	74, 77	

UNIVERSAL STANDARDS				
No.	Disclosures	Location	Comments to SR / Omissions	
<b>GRI 3: Material Topics 2021</b>				
3-1	Process to determine material topics	9, 11, 97		
3-2	List of material topics	9, 11	New topic added – Climate change	
TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
<b>Topic 11.1 GHG emissions</b>				
<b>Energy efficiency; Reduction of GHG and pollutants' emissions</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.1	97, 100-101, 106, 111-113	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	11.2	112	302-1 – c (ii, iii, iv), d. Not applicable. KPO does not keep separate records on steam consumption and energy consumption for cooling; these data are included in the total amount of electricity consumption. KPO does not sell electricity, heat, air conditioning and steam. f. – KPO applies standards, methods and conversions regulated by the RoK normative documents in energy saving and energy efficiency. g – 1 TCE = 29.31 Unit Converter – Data Tools – IEA
	302-2 Energy consumption outside of the organization	11.3		Not applicable
	302-3 Energy intensity	11.4	112	d – The KPO keeps records of energy consumption within the organization.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	11.5	109	d – The KPO does not use the base year for calculations.
	305-2 Energy indirect (Scope 2) GHG emissions	11.6	110	d – The KPO does not use the base year for calculations.
	305-3 Other indirect (Scope 3) GHG emissions	11.7		Information unavailable
	305-4 GHG emissions intensity	11.8	110	
G4 Oil and Gas Sector Disclosures 2012	OG6 Volume of flared and vented hydrocarbon		108	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
<b>Topic 11.2 Climate adaptation, resilience, and transition</b>				
<b>Environmental investments; Environmental compliance; Climate change</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.2.1	96-97	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	11.2.2	6, 8, 149	
G4 Oil and Gas Sector Disclosures 2012	OG2 Total amount invested in renewable energy		149	
GRI 305: Emissions 2016	305-5 Reduction of GHG emissions	11.2.3	96	Information incomplete
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria (partial disclosure)		99	Information incomplete
	308-2 Negative environmental impacts in the supply chain and actions taken		99	
<b>Topic 11.3 Air emissions</b>				
<b>Air quality monitoring; Reduction of GHG and pollutants' emissions</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.3.1	106	
GRI 305: Emissions 2016	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	11.3.2	107, 109	
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	11.3.3	20	There were not registered any impacts with regards to customer health and safety.
<b>Topic 11.4 Biodiversity</b>				
<b>Biodiversity and ecosystems conservation</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.4.1	97, 100, 127	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	11.4.2	Website <a href="https://kpo.kz/Preservation-of-Biodiversity">https://kpo.kz/Preservation of Biodiversity</a>	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
	304-2 Significant impacts of activities, products, and services on biodiversity	11.4.3	129, 131; website <a href="https://kpo.kz: Monitoring of flora and fauna">https://kpo.kz: Monitoring of flora and fauna</a>	
	304-3 Habitats protected or restored	11.4.4	101	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	11.4.5	Website <a href="https://kpo.kz: Preservation of Biodiversity">https://kpo.kz: Preservation of Biodiversity</a>	
Topic 11.5 Waste				
Management of waste and effluents				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.5.1	97, 122	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	11.5.2	122	
	306-2 Management of significant waste-related impacts	11.5.3	123	
	306-3 Waste generated	11.5.4	123-124	
	306-4 Waste diverted from disposal	11.5.5	123-124, 126	
	306-5 Waste directed to disposal	11.5.6	123-125	
G4 Oil and Gas Sector Disclosures 2012	OG7 Amount of drilling waste and strategies for treatment and disposal		123, 125	
Topic 11.6 Water and effluents				
Management of waste and effluents; Water conservation				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.6.1	97, 115	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	11.6.2	115	
	303-2 Management of water discharge-related impacts	11.6.3	117, 119, 121	
	303-3 Water withdrawal	11.6.4	115-117	
	303-4 Water discharge	11.6.5	117-118	
	303-5 Water consumption	11.6.6	115-116	
GRI 303: Water 2016	303-3 Water recycled and reused		119	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
<b>Topic 11.7 Closure and rehabilitation</b>				
<b>Personnel development and training; Industrial relations with contractors; Freedom of association and collective bargaining</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.7.1	69, 97	
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	11.7.2		In accordance with the Collective agreement, KPO has the obligation to raise a minimum two-month (8 weeks) notice to Trade Unions in case of liquidation of the Company with a subsequent reduction in staff, system or amount of remuneration leading to deprivation of employees' conditions.
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	11.7.3	79	
GRI 304: Biodiversity 2016	304-3 Habitats protected or restored	11.4.4	101	
<b>Topic 11.8 Asset integrity and critical incident management</b>				
<b>Spills; Process safety; Emergency Response</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.8.1	24	KPO impact boundary covers KPO facilities at the Karachaganak field, the export pipeline in West Kazakhstan and Atyrau oblasts.
GRI 306: Effluents and Waste 2016	306-3 Significant spills	11.8.2	26	The topic covers KPO and contractors.
G4 Oil and Gas Sector Disclosures 2012	OG13 Number of process safety events, by business activity	11.8.3	24-26	
<b>Topic 11.9 Occupational health and safety</b>				
<b>Occupational safety and health; Protection of health</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics		24, 52, 60	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	11.9.2	39	
	403-2 Hazard identification, risk assessment, and incident investigation	11.9.3	24-25, 53, 59, 65;	<a href="https://kpo.kz: HSE Card Programme">website https://kpo.kz: HSE Card Programme</a>
	403-3 Occupational health services	11.9.4	64-66	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
	403-4 Worker participation, consultation, and communication on occupational health and safety	11.9.5	website <a href="https://kpo.kz: HSE Card Programme">https://kpo.kz: HSE Card Programme</a>	
	403-5 Worker training on occupational health and safety	11.9.6	27, 57, 82	
	403-6 Promotion of worker health	11.9.7	65-67	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	11.9.8	24-25, 39, 56	
	403-8 Workers covered by an occupational health and safety management system	11.9.9	39	
	403-9 Work-related injuries	11.9.10	53-55	There were no fatalities and lost-time injuries among employees in the reporting period. The number of total recordable injuries among employees = 3. There were no fatalities among the workforce who are not employees. The number of lost-time injuries among workforce who are not employees = 7. The number of total recordable injuries among workforce who are not employees = 12.
	403-10 Work-related ill health	11.9.11	65	

Topic 11.10 Employment practices				
Employment and compensation; Personnel development and training; Industrial relations with contractors				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.10.1	68-69	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	11.10.2	72-73	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	11.10.3	77	
	401-3 Parental leave	11.10.4	73	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	11.10.5		In accordance with the Collective Agreement, KPO has the obligation to raise a minimum two-month (8 weeks) notice to Trade Unions in case of liquidation of the Company with a subsequent reduction in staff, system or amount of remuneration leading to deprivation of employees' conditions.
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	11.10.6	77, 82	
	404-2 Programs for upgrading employee skills and transition assistance programs	11.10.7	73, 79, 81, 83-84	
	404-3 Percentage of employees receiving regular performance and career development reviews		77	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	11.10.8	43, 141	
	414-2 Negative social impacts in the supply chain and actions taken	11.10.9	62, 87-88	The percentage of suppliers identified in 2024 as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of the assessment was %.  There were no cases of termination of relationships with suppliers as a result of assessment of actual and potential negative social impacts.
Topic 11.11 Non-discrimination and equal opportunity				
Increase of local content in staff; Respect for human rights; Social, cultural and gender diversity, equal opportunities				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.11.1	40-41, 68-69	KPO impact boundary covers Kazakhstan. Terms of the Collective Agreement are reviewed every 2-3 years.
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage		76	202-1-a. Not applicable  There are no differences in salary levels by gender. Karachaganak O&G condensate field located in the Western Kazakhstan Oblast (Republic of Kazakhstan) relates to 'significant location of operations'.

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
	202-2 Proportion of senior management hired from the local community	11.11.2	78	In the table "Increase of Local Content in KPO staff by categories of employees", the concept of 'Local' in the context refers to national employees, the citizens of the Republic of Kazakhstan. Karachaganak O&G condensate field located in the Western Kazakhstan Oblast (Republic of Kazakhstan) relates to 'significant location of operations'.
GRI 401: Employment 2016	401-3 Parental leave	11.11.3	73	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	11.11.4	77, 82	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	11.11.5	69, 71-72, 78-79	
	405-2 Ratio of basic salary and remuneration of women to men	11.11.6	76	Karachaganak O&G condensate field located in the Western Kazakhstan Oblast (Republic of Kazakhstan) relates to 'significant location of operations'. Basic salaries are established for employee categories regardless of gender, and hence basic salaries for women and men are equal.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	11.11.7		There were not registered any cases of discrimination during the reporting period.
Topic 11.12 Forced labor and modern slavery				
Respect for human rights; Security practices; Freedom of association and collective bargaining				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.12.1	40-41	KPO impact boundary covers West Kazakhstan Oblast. Terms of the Collective Agreement are reviewed every 2-3 years.
GRI 408: Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor		41	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	11.12.2	41, 87	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	11.12.3	43, 141	

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
<b>Topic 11.13 Freedom of association and collective bargaining</b>				
<b>Freedom of association and collective bargaining</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.13.1	40, 85, 86	KPO impact boundary covers West Kazakhstan Oblast. Terms of the Collective Agreement are reviewed every 2-3 years.
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	11.13.2	87-88	
<b>Topic 11.14 Economic impacts</b>				
<b>Employment and compensation; Increase of local content in staff; Social infrastructure projects; Sponsorship and charity; Supply of electrical power to regional network; Local content development and its share in procurement of goods, works and services; Procurement practices and supply chain; Estimated proved reserves and production</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.14.1	68-69, 140, 142	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	11.14.2	138	
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage		76	202-1-a. Not applicable There are no differences in salary levels by gender. Karachaganak O&G condensate field located in the Western Kazakhstan Oblast (Republic of Kazakhstan) relates to 'significant location of operations'.
	202-2 Proportion of senior management hired from the local community	11.14.3	78	By 'senior management' is meant to be Executive management and their deputies' given in category 1+2 in "Increase of Local Content in Staff by categories of employees" (Tab. 16, p. 70). 'Local' in the context refers to national employees, the citizens of the Republic of Kazakhstan.
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	11.14.4	64, 146-148	
	203-2 Significant indirect economic impacts	11.14.5	142	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	11.14.6	142-143	
G4 Oil and Gas Sector Disclosures 2012	OG1 Volume and type of estimated proved reserves and production		16	Information incomplete

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
<b>Topic 11.15 Local communities</b>				
<b>Community relations: impact assessment and mitigation, grievance redress; Environmental grievance mechanisms</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.15.1	90-91	The KPO impact boundary covers the local communities in villages along the perimeter of the Karachaganak field and Aksai town in the Burlin district of WKO
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	11.15.2, 11.15.4	91-92, 101, 103, 105; website <a href="https://kpo.kz:Atmospheric air monitoring in the villages adjacent to the Karachaganak field">https://kpo.kz:Atmospheric air monitoring in the villages adjacent to the Karachaganak field</a>	
	413-2 Operations with significant actual and potential negative impacts on local communities	11.15.3	127, <a href="https://www.kpo.kz/en/sustainability/social-responsibility/community-engagement/monitoring-of-resettled-communities">https://www.kpo.kz/en/sustainability/social-responsibility/community-engagement/monitoring-of-resettled-communities</a>	
<b>Topic 11.16 Land and resource rights</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.16.1	90-91	The KPO impact boundary covers the local communities in villages along the perimeter of the Karachaganak field and Aksai town in the Burlin district of WKO
G4 Oil and Gas Sector Disclosures 2012	OG12 Operations where involuntary resettlement took place, the number of households resettled in each and how their livelihoods were affected in the process	11.16.2	90-91; website <a href="https://kpo.kz:Resettlement of the Berezovka and Bestau villages">https://kpo.kz:Resettlement of the Berezovka and Bestau villages</a> , KPO Sustainability Report 2017, pp.105-106	
<b>Topic 11.17 Rights of indigenous peoples</b>				
Not applicable for Kazakhstan				
<b>Topic 11.18 Conflict and security</b>				
<b>Security practices; Respect for human rights</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.18.1	85, 87	The impact boundary covers KPO and contractors within the facilities of the Karachaganak field, the West Kazakhstan Oblast and the export pipeline facilities in the Atyrau Oblast

TOPIC-SPECIFIC DISCLOSURES				
GRI Standard / Material topics	Disclosure	GRI 11 Sector Standard Ref. No.	Location in Report	Comments to SR / Omissions
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	11.18.2	85	
<b>Topic 11.19 Anti-competitive Behavior</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.19.1	40-41	
GRI 206: Anticompetitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	11.19.2	45	
<b>Topic 11.20 Anti-corruption</b>				
<b>Anti-corruption and Compliance</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.20.1	40-41	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	11.20.2	42-43	
	205-2 Communication and training about anti-corruption policies and procedures	11.20.3	43	
	205-3 Confirmed incidents of corruption and actions taken	11.20.4	42-43	During the reporting period, there were no confirmed cases of corruption identified at KPO.
<b>Topic 11.21 Payments to governments</b>				
<b>Transparency of payments to the government (EITI)</b>				
GRI 3: Material Topics 2021	3-3 Management of material topics	11.21.1	142	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	11.21.2	138	
	201-4 Financial assistance received from government	11.21.3		KPO did not receive monetary financial assistance from the republic for the reporting period and doesn't make any donations to government/political needs.
GRI 207: Tax 2019	207-1 Approach to tax	11.21.4	138	
	207-2 Tax governance, control, and risk management	11.21.5	138	
	207-3 Stakeholder engagement and management of concerns related to tax	11.21.6	138	
	207-4 Country-by-country reporting	11.21.7	138	
<b>Topic 11.22 Public policy</b>				
As stated in the KPO Business Principles and the Code of Conduct, Political Payments or "in-kind contributions" must never be made by KPO or by Trade Associations with KPO funds. KPO must not take part in party politics.				