

# MANAGING MATERIAL TOPICS IN KPO / GRI 3-3 /

Good governance is essential for ensuring the sustainability of large-scale investments, and particularly important in a complex governance structure as the one of KPO in which our strong governance, internal controls and assurance processes are vital to our ongoing success.

In all aspects of its activities and in accordance with the FPSA, KPO operates to internationally recognized standards, which are implemented through a number of policies, procedures and appropriate best practices embedded in KPO's management systems.

KPO's management systems and regulatory documents related to sustainable development for each of material topics are shown on the following table.

## Managing documents on sustainability issues in KPO (by material topics) / GRI 3-3 /

Material topics	Management System documents
Socio-Environmental topics	<b>Occupational safety and health</b> Health, Safety and Environmental Policy; Golden Rules; Life Saving Rules; Health, Safety and Environmental Management System Framework; Safety & Asset Integrity Controllership System Manual; H <sub>2</sub> S Protection Strategy; KPO 4-Year Strategic HSE Plan; KPO HSE Improvement Plan 2024; Safety Leadership & Culture Programme;
	<b>Protection of health</b> No Smoking Policy; Prohibition on Use of Alcohol, Drugs, Psychotropic and Toxicomaniac Substances (their analogues) in KPO; 2024 Health Promotion Plan; Fatigue Risk Management Programme; Mental Health Programme; Stress Resilience Programme;
	<b>Process safety</b> Safety & Asset Integrity Controllership System Manual; Process Safety Fundamentals Guideline; Simultaneous Operations Risk Management Strategy; Barrier Model Guideline;
	<b>Emergency Response</b> Terms of Reference for the KPO Civil Defence; Terms of reference for the KPO evacuation commission; Strategy for Protection of People in H <sub>2</sub> S Emergencies in the Field; Emergency Response Plan and Rectification of the Consequences of Accidents;
	<b>Community relations: impact assessment and mitigation, grievance redress</b> KPO Social Performance Policy and Standards; KPO Community Grievance and Suggestion Management Procedure; Socio-economic Baseline and Impact Assessment Operating Procedure; Relevant Parties Operating Procedure; Cultural Heritage Operating Procedure; Involuntary Resettlement Operating Procedure; KPO Community Development Procedure;

Material topics	Management System documents	
Social topics	<b>Personnel development and training</b>	Annual Training Plan; Business Continuity Plan for Training Development Centre; Training Planning and Budgeting Preparation Procedure for KPO Employees Enhanced Development Programme; KPO scholarship for national employees and their children;
	<b>Industrial relations with contractors</b>	Industrial Relations Policy; Contractor HSE Management Procedure; Schedule D – Contract HSE Requirements; Schedule H – Contract Industrial Relations;
	<b>Freedom of association and collective bargaining</b>	Collective Agreement; Policy on Labour Disputes;
	<b>Security practices</b>	Security Management System Framework; KPO Security Policy; In-House Investigation Policy; Employees' Personal Data Management Policy; KPO Clear Desk Policy;
	<b>Equal opportunities, social, cultural and gender diversity</b>	KPO Sustainable Development Chapter; KPO Business principles;
	<b>Respect for human rights</b>	KPO Code of Conduct; Hotline; Ethic and Compliance Training Program; Compliance Investigations Procedure;
Socio-Economic topics	<b>Employment and compensation</b>	Human Resources and Services Directorate Management System Manual; Annual Pay Review; Remuneration Policy for Kazakhstan Employees; Procedure of Reduction of the number or the staff of KPO employees; Program on Voluntary Dissolution of Employment Relationship with Provision of Benefits for KPO Employees;
	<b>Local content in staff</b>	2020–2025 Programme for Local Content Increase in Staff;
	<b>Social infrastructure projects</b>	Karachaganak Field's Final Production Sharing Agreement (Annex 5); Social Projects Department Management System; Social Investment Operating Procedure; Social and Infrastructure Projects Control Procedure; Social and Infrastructure Projects Management of Change Procedure;
	<b>Sponsorship and charity</b>	KPO Sponsorship and Donations Policy; KPO Scholarship Programme for Rural District Community;
	<b>Supply of electrical power to regional network</b>	Karachaganak Field's Final Production Sharing Agreement (Art.I, Section 11.);
	<b>Anti-corruption and Compliance</b>	Anti-Bribery and Corruption and Anti-Money Laundering Manual; Guidelines on Managing Conflicts of Interest; Trade Compliance Manual; Ethic and Compliance Training Program; Ethical Due Diligence Procedure;
	<b>Local content development and its share in procurement of goods, works and services</b>	Local Content Policy; Local Content Development Programme 2024–2029; Procedure on Reporting purchased goods, works and services; Local Content Audit Procedure; Early Tender-Trial Order Testing Procedure;

	Material topics	Management System documents
Economic topics	<b>Technologies and innovations</b>	Digital Roadmap; Digitalization and Continuous Improvement Strategy; Business Communications Social Media and Use of IT Policy;
	<b>Estimated proved reserves and production</b>	Reserves Re-Determination Report for the Karachaganak field;
	<b>Procurement practices and supply chain</b>	Contracts and Procurement Policy; Karachaganak JOC's Tender Procedures; Annex 1 to JOC Resolution dated April 2020; Ethical Due Diligence Procedure;
	<b>Transparency of payments to the government (EITI)</b>	Karachaganak Field's Final Production Sharing Agreement (Art.XIX); Tax Accounting Policy of Kazakhstan Branch of Karachaganak Petroleum Operating B.V.;
Environmental-Economic topics	<b>Climate change</b>	KPO-365 Business Strategy; KPO Green Strategy; KPO Environmental Concept;
	<b>Energy efficiency</b>	KPO Energy Policy and Green Rules; Energy Management System Manual; Guideline on Green Office; KPO Green Office Project Implementation Plan; Energy Management System Plan; Energy review and energy efficiency monitoring procedure;
	<b>Environmental compliance</b>	Environmental Impact Assessment Arrangement Procedure when developing planned activity projects; Emission, Waste Accumulation / Burial Limits Accounting and Monitoring Procedure; Environmental Legal Compliance Register; Action Plan on the Compliance with Requirements of the RoK Environmental Code;
	<b>Environmental investments</b>	KPO Environmental Protective Measures Plan; Summary Environmental Aspects Register KPO; Environmental Culture and Awareness Enhancement Program for 2025–2028;

	Material topics	Management System documents
Environmental topics	<b>Spills</b>	Oil Spill Contingency Plan; KOTS and Gathering main pipelines and infield pipelines rivers / aerial crossings oil;
	<b>Air quality monitoring</b>	PEC: Production Environmental Monitoring; Environmental Monitoring Data Assurance Programme;
	<b>Reduction of GHG and pollutants' emissions</b>	Air Emissions Management Procedure; Greenhouse Gas Emissions Management Procedure; Procedure for measuring industrial emissions with instruments at the KOGCF facilities; Vertical Flare Hydrocarbon Flaring Accounting and Reporting; Accounting and Reporting Procedure for hydrocarbons flaring at vertical and horizontal Flare Stacks; The methodology for calculating greenhouse gas emissions from fugitive emissions sources of Karachaganak Oil and Gas Condensate Field;
	<b>Water conservation</b>	KOGCF Water Strategy – Technical and Produced Water Management; Procedure for the management of water consumption and discharge, accounting and reporting during KPO water management activities; Karachaganak Field Potable and Technical Water Consumption Records and Report Procedure; Procedure for register, storage and utilization of saltsaturated subsurface water in cell No 2;
	<b>Management of waste and effluents</b>	Waste Management Procedure; Procedure on Acceptance and Classification of Waste at WMC (Eco Centre); Solid Industrial Waste Burial Landfill;
	<b>Biodiversity and ecosystems conservation</b>	Biodiversity Action Plan;
	<b>Environmental grievance mechanisms</b>	Odour Complaints Management Procedure for the communities adjacent to the Karachaganak field.