

Approved by decision of the Board of directors JSC Samruk-Energo from «28» november 2018 Protocol № 12/18

Stakeholder Engagement Plan of "Samruk-Energy" JSC

Astana 2018

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1. Definitions and reductions

1. In the present Stakeholder Engagement Plan the following definitions and reductions are applied:

interaction with	_	set of the mechanisms and procedures providing the right of
interested parties	-	interested parties to be heard, accountability before them;
I I		
ADO	-	affiliated and dependent organization;
interested party/	-	natural persons, legal entities, groups of natural or legal
stakeholder		entities who have a direct or indirect impact or can come
		under influence of activity of the organization, their
		products or services and the connected actions owing to
		rules of law, the signed contracts (contracts);
card of interested parties/	-	the image for specification of position of interested parties
stakeholders		of Companyy or graphical representation of groups of
		interested parties;
Company	_	JSC Samruk-Energo;
UN	_	United Nations Organization;
Supplier	_	natural persons, legal entities, groups of natural or legal
Supplier	_	entities which are carrying out delivery of goods/services
		(including contract organizations);
MEDIA		Media;
	-	
AA1000 standards	-	a series of the international standards in the field of
		accountability, interaction with stakeholders and
		verifications;
Sustainable development	-	the set and balance of aspects of activity at which operation
		of natural resources, the direction of investments,
		orientation of scientific and technical development and
		social responsibility are coordinated with each other and
		strengthen the present and future potential for satisfaction of
		human wants and aspirations.

2. Appointment and scope

2. The present Stakeholder Engagement Plan describes the principles and approach of JSC Samruk-Energo (further – Company) to involvement of interested parties and is aimed at creation of effective communications and dialogue between Company and its interested parties.

3. Interaction with interested parties is the continuous process including set of the mechanisms and procedures providing the right of interested parties to be heard, accountability before them.

4. The Stakeholder Engagement Plan (further – the Plan) is developed by Company and each affiliated and dependent organization (further – ADO) implementing the large investment project.

5. The plan is reviewed on an ongoing basis, but at least once per year and updated if necessary.

3. General Information

6. Company is created on April 18, 2007 according to the decision of general shareholder meeting for the purpose of realization of long-term state policy on modernization existing and to input of the new generating capacities. Founders of Company at the time of creation were "The Kazakhstan holding on management of the state assets Samruk and JSC Kaztransgaz.

Company was registered on May 10, 2007. The only shareholder of Company as of November, 2018 is JSC Samruk-Kazyna (further – Fund).

Primary activities of Company are management of power assets in the Republic of Kazakhstan and also assistance in modernization existing and construction of the new generating capacities, implementation of new technologies in power to the Republic of Kazakhstan.

Now such companies as JSC "Ekibastuz GRES-2 Station", Ekibastuz GRES-1 of Bulat Nurzhanov LLP, Bogatyr Komir LLP owning the world's largest coal mine, JSC Moynaksky Hydroelectric Power Station, JSC Shardarinsky Hydroelectric Power Station, JSC Almaty Power Plants, "AlaTauZharykCompaniyasy" and others are a part of assets of Company.

Rated capacity of power plants of Company as of December 31, 2017 was 6.8 GW from which 5.0 GW are the share of thermal power plant, 0.95 GW – of combined heat and power plant and 0.85 GW – of hydroelectric power station and RES. Restrictions on the power of objects of generation for 2017 averaged 1.2 GW.

Company's Key indicators for 2017:

- 1) Power production volume -28.7 bln kWh.
- 2) A share in domestic market of the electric power -28%.
- 3) Coal mining volume -40.4 million tons.
- 4) KIUM 48.1%.
- 5) A share of RES in structure of capacities of Company -0.6% (47 MW).
- 6) Net income / loss (27.9 billion tenges).
- 7) EBITDA margin -35%.
- 8) Debt/EBITDA relation 4.64
- 9) LTIFR 0,17.
- 10) ROACE (0,55).
- 11) The rating of corporate management Century.

4. The principles of interaction with interested parties

7. Interaction of Company with stakeholders is conducted on the basis of the following principles:

- respect and accounting of interests, opinions and preferences of interested

parties;

- timely and regular informing interested parties;
- responsible implementation of the assumed obligations.

8. These principles are determined by the Sustainable Development Guidelines of the Company and underlie of any interaction of Company with stakeholders.

5. Requirements to interaction with interested parties

9. Activities of Company for interaction with interested parties correspond to the current legislation of the Republic of Kazakhstan, including the Convention European Economic the Commissions of the UN about access to information, participation of the public in decision-making process and access to justice on the questions concerning the environment and also requirements of policy of the European Bank for Reconstruction and Development for disclosure of information and interaction with interested parties (TP10 "Disclosure of information and involvement of interested parties").

9.1. Requirements of the European Bank for Reconstruction and Development

The European Bank for Reconstruction and Development adheres to the principles of informing the public stated in TP 10 "Disclosure of information and involvement of interested parties".

Interaction with the interested and concerned parties has to begin at early development stages of the project and proceed during all term of its realization.

The main actions for interaction with interested parties are:

- Identification and analysis of interested parties. For creation of the successful relations with interested parties the initiator of the project has to identify all parties which are directly or indirectly concerned or will be mentioned by implementation of the project or can be interested in the project;

- Planning of interaction with interested parties. The initiator of the project will develop the Plan which will define the procedure of relationship with the identified interested parties at stages of preparation and implementation of the project;

- Disclosure of information. Practice of disclosure of information is an integral part of process of interaction with interested parties as it helps interested parties to assume risks, consequences and advantages of the project;

- Consultations and interaction.

- Feeder and considerations of complaints;

– Monitoring and providing puffiness

The character and systematicity of interaction with interested parties vary depending on character and the scale of the project, risks and potential negative consequences rendered to them on the affected communities, vulnerable objects of the environment and degree of interest from the public.

Development and use of the full-function feeder and consideration of complaints is the mandatory requirement promoting prevention and/or timely resolution of conflicts.

Kazakhstan ratified the Convention on access to information, participation of the public in decision-making process and access to justice on the questions concerning the environment,

known as the Aarhus convention. Provisions of the Convention grant the public right of access to information concerning the environment and on participation in the solution of environmental problems.

According to the Ecological code of the Republic of Kazakhstan approved by the Decree of the President of the Republic of Kazakhstan of January 09, 2007 No. 212, the population and non-governmental organizations have right of access to ecological information concerning environmental impact assessment (further – EIA) and decision-making process.

Access to ecological information has to be provided as at a project development stage (within EIA), and at a stage of the state environmental assessment.

Within EIA the customer provides

– сбор и рассмотрение информации в части общественного мнения, замечаний и опасений общественности;

- in common with local authorities carries out public hearings;

- provides accounting of public opinion in design decisions; protocols of public hearings, the list of participants and the register of offers / remarks have to be attached;

The order of providing access to information within the state environmental assessment is defined by the authorized body which is engaged in environmental protection.

6. Identification and analysis of interested parties

10. Company for ensuring effective interaction with interested parties, developments of methods of interaction with each of stakeholders, definition of their needs and expectations concerning interaction carries out identification and the analysis of such parties that allows Company to systematize and visualize information on an environment of Company.

11. Interested parties are natural persons, legal entities, groups of natural or legal entities who have a direct or indirect impact, or can come under influence of activity of Company, its products or services and the connected actions owing to rules of law, the signed contracts (contracts).

12. With interested parties Company will apply the principle of "inclusiveness" according to the best practices in the field of interaction with interested parties (standards of the AA1000, GRI series) to forming of interaction. This principle takes into account and considers the interests of all interested parties at all stages of process of management of activity of Company.

13. Company defines the full list of potential stakeholders with whom carries out interaction in the course of the activity.

14. For assessment of the importance of each of certain interested parties primary ranging of stakeholders on model Mitchell, Agl and Wood with breakdown on internal and external is carried out.

15. Company on the basis of results of identification and the analysis forms the Card of stakeholders which joins interested parties, significant for Company.

16. In appendix all interested parties of Company, their interests and preferable actions for informing and interaction which have to be carried out by Company are represented.

7. Feeder and grievance procedure and offers

17. In Company for prevention and timely permission of the possible conflicts the feeder and considerations of complaints and offers is created. This mechanism promotes more operational and effective permission of individual and collective complaints and promotes pre-judicial settlement of disputes.

18. Company recognizes importance of increase in trust to the line of initiative informing in order that workers and other interested parties could be sure that their messages will be considered properly and the appropriate measures of reaction will be taken:

- Everything interested to send the message online on the website of Company on the following link of https://www.samruk-energy.kz/ru/hotline or on e-mail: sk.hotline@deloitte.kz;

to call number: 8 800 080 19 94.

19. The specified types of communication work round the clock without days off. All messages are accepted and processed by the external operator. The messages received in the specified ways are transferred to responsibles of Company who can provide professional consideration.

20. For the most effective processing of the message, it is offered to leave contact information, however according to this mechanism complaints can be filed in confidential or, moreover, on an anonymous basis.

21. In addition to the line of initiative informing administered by the external operator, Company provides several internal channels for concern expression directly:

To the unit manager;

To the management of Company;

To the head of Service "Compliance";

To the head of Service of internal audit;

To the ombudsman of Company.

22. For all interested parties wishing to express the concern or to leave a comment about activity of Company and its DZO on the website of Company the form of "Feedback" is introduced. Feedback provides including a possibility of the address of persons, temporary employees, or the faces which are not consisting in the labor relations with group of Company and other interested persons on the implemented projects. All arrived addresses are fixed in Base of complaints and offers. On the basis of the analysis of the arrived data, Company informs to the Board of directors of Company information on concern of interested parties and reveals areas for improvement.

23. Other mechanism of interaction of Company with interested parties is the questionnaire posted on the website of Company. Results of the questionnaire are used as the tool for definition of the subjects which are subject to disclosure within the annual report following the results of activity of Company.

24. According to decisions of the management of Company the organization and other ways of submission of complaints is possible. To company that this process was readily available for any interested party is important.

8. Monitoring and reporting

25. Company has to observe the principle of transparency of activity that is the

effective instrument of achievement of positive image of Company.

26. Company will provide to interested parties periodic reports on the course of implementation of the Plan and also concerning the problems revealed via the feeder and considerations of complaints.

27. For this purpose and for increase in effectiveness of process of interaction with interested parties Company will carry out continuous monitoring and the analysis of efficiency of the actions provided by the Plan.

28. These actions will allow to carry out assessment of adequacy and reliability of the applied interaction methods and also their compliance to statutory requirements and/or international standards and/or internal regulations of Company.

29. Monitoring will be made on a regular basis, but at least once per year at each subsidiary and affirmed in the established procedure no later than 2 months following the reporting year.

30. Besides, Company will provide the annual report in the field of ecological and social indicators for the interested parties as a part of the annual report or other public document in the form of the separate publication.

9. Normative references

31. The present Plan is developed taking into account requirements of the following documents:

1) Charter of Company;

2) Referensny model on sustainable development for portfolio companies of JSC Samruk-Kazyna;

3) The management in the field of sustainable development of Company;

- 4) Corporate management of Company;
- 5) Code of behavior of Company;
- 6) Policy of initiative informing Company;
- 7) Environmental policy of Company;
- 8) Rules of management of internal standard documentation of Company;

9) The instruction for ensuring safety of office and commercial information in Company;

10) International standards AA1000: SES, AS, APS;

11) Standards of the reporting under sustainable development (GRI Standards: 101,

102, 103, 200, 300, 400, etc.).

Appendix

Stakeholder Engagement Plan of "Samruk-Energy" JSC

N⁰	Interested parties	Contribution of	Interests of	Action for informing/term / Responsible joint venture
		interested parties	interested parties	
1	Shareholders	• Allocation of financial means, replenishment of authorized capital	Profit markup, timely payment of dividends, increase in cost of Fund, social and ecological responsibility, respect for the principles of sustainable development, lack of complaints and penalties for violation of the ecological legislation	 departments); 2. Holding Poll on disclosure of essential subjects – annually (CGSDD); 3. Holding meetings, business correspondence - on a constant basis (all departments); 4. Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis (GRCO); 5. Discussion on SD of questions of course of execution of expectations of the shareholder, the Program of Transformation of business and implementation of investment projects – annually (SPEAD, TO, PO);
2	Affiliated and dependent organizations	Observance of interests of shareholders	Assistance during the work with public authorities, commercial interests	1. Bringing to data of DZO of expectations of the shareholder to BoD/SB ADO -

				 6. Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); 7. Publications in media - on a constant (GRCO; в Депозитарий финансовой отчетности - TCFD, ATAD); 8. Holding Poll on disclosure of essential subjects - annually (CGSDD); 9. Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD); 10. Preparation and the publication of the integrated annual report of Company – annually (CGSDD).
3	Employees	 Human resources Loyalty 	Stability, high salary, worthy working conditions, professional development, career development	 Holding a meeting with collective, DZO, labor union ("Results of year") - annually, no later than March 31 (HR); Formation of cultural corporate actions for employees - annually (HR); Informing employees by e-mail about vacant positions, internal competitions - on a constant basis (HR); Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Placement of relevant information on the internal portal of Company (TO); Publications in media - on a constant basis (GRCO; in Depositary of financial statements - TCFD, ATAD); Holding Poll on disclosure of essential subjects - annually (CGSDD); Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD).

4	Labour Union	• Assistance to ensuring	Observance and	1. Holding a meeting with collective, DZO, labor union ("Results of year") -
		social stability,	protection of the rights	annually, no later than March 31 (HR);
		regulation of the labor	of workers	2. Placement on the corporate website of Company / social networks of relevant
		relations and resolution		public information on Company in process of its emergence - on a constant basis
		of conflicts		- (GRCO);
				3. Holding Poll on disclosure of essential subjects - annually (CGSDD).
				4. Publications in media - on a constant basis (GRCO; in Depositary of financial
				statements - TCFD, ATAD).
5	Partners	• Joint implementation of	Commercial interests	1. Placement on the corporate website of Company / social networks of relevant
		projects		public information on Company in process of its emergence - on a constant basis
		• Transfer of		- (GRCO);
		technologies,		2. Publications in media - on a constant basis (GRCO; in Depositary of financial
		competences and		statements - TCFD, ATAD);
		innovations		3. Holding Poll on disclosure of essential subjects - annually (CGSDD);
				4. Holding meetings, business correspondence - on the constant basis - (PO);
				5. Informing by means of participation of the management of Companyy as the
				speaker at conferences, forums, etc on a constant basis (OCMB, MDD);
				6. Preparation of the integrated annual report of Company – annually (CGSDD).
6	Consumers	 Loyalty of Companyy 	Quality of	1. Placement on the corporate website of Company / social networks of relevant
		• Financial resources by	products/services,	public information on Company in process of its emergence - on a constant basis
		purchase of goods and	commercial interests	- (GRCO);
		services		2. Publications in media - on a constant basis (GRCO; in Depositary of financial
				statements - TCFD, ATAD);
				3. Holding Poll on disclosure of essential subjects - annually (CGSDD);
				4. Informing by means of participation of the management of Company as the
				speaker at conferences, forums, etc on a constant basis (MDD);
				5. Business correspondence, holding meetings with the existing and potential
				consumers - on a constant basis (TH);
				6. Preparation of the integrated annual report of Company – annually (CGSDD).
7	Public authorities	• state regulation	Tax revenues,	1. Providing the reporting (financial, non-financial) - on a constant basis (FCD,
			economic growth,	MDD, SPEAD);
			solution of social	2. Holding meetings, business correspondence - on a constant basis - (MDD, PO);
			tasks, preservation	3. Placement on the corporate website of Company / social networks
				relevant public information on Company in process of its emergence - on a
			the surrounding	constant basis - (GRCO);
			environment for	4. Publications in media - on a constant basis (GRCO; in Depositary of financial

			ensuring health of the population and preservation of a biodiversity	 5. Holding Poll on disclosure of essential subjects - annually (CGSDD); 6. Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD); 7. Preparation of the integrated annual report of Company – annually (CGSDD).
8	Competitors	Opportunities for future development	Increase in a share of presence in the market	 Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Publications in media - on a constant basis (GRCO; in Depositary of financial statements - TCFD, ATAD); Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD); Preparation of the integrated annual report of Company – annually (CGSDD).
9	Financial institutions	 International grants Preferential financing of projects • Credit lines Placement of money 	Timely payment of a principal debt and remuneration, profitability of the enclosed investments. Placement of free money on deposit accounts, service of special accounts, participation in implementation of programs of Companyy, ecological and social responsibility	 Providing the reporting on a quarterly/semi-annual/annual basis (TCFD). Portal of JSC Kazakhstan Stock Exchange: Placement of reporting/information, protocols, etc. in terms according to the Resolution of National Bank No. 26 of January 28, 2016 "About the approval of Rules of placement on Internet resources of depositary of financial statements, stock exchange of information on corporate events, financial statements and auditor reports, lists of affiliates of joint-stock companies and also information on total amount of remuneration of members of executive body following the results of a year" and requirements of Listing rules of JSC Kazakhstan Stock Exchange (TCFD). Creditors: Providing reports / information on Company, according to requirements of the

				 4. Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD); 5. Preparation of the integrated annual report of Company – annually (CGSDD).
10	Supplyers	• Efficiency of a supply network and chain of value creation	Commercial interests	 Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Publications in media - on a constant basis (GRCO); Holding meetings, business correspondence - on a constant basis - (The joint venture on competence); Informing by means of participation of the management of Company as the speaker / дискуссанта at conferences, forums, etc on a constant basis (OCMB, MDD); Preparation of the integrated annual report of Company – annually (CGSDD).
11	Population	• Support in places of implementation of activity	Opportunity for employment, solution of social problems, transparency of activity of Companyy, preservation of the surrounding environment	
12	Public associations	 Stimulation of application of high standards in activity Loyalty and cooperation 	Realization of goals and problems of public associations, preservation of the surrounding environment for ensuring health of the population and preservation of a biodiversity	 Holding a meeting with collective, DZO, labor union ("Results of year") - annually, no later than March 31 (HR); Holding meetings, business correspondence - on a constant basis - (MDD, the joint venture on competence); Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Publications in media - on a constant basis (GRCO); Holding Poll on disclosure of essential subjects - annually (CGSDD); Informing by means of participation of the management of Company as the speaker at conferences, forums, etc on a constant basis (OПП, ДРР); Preparation of the integrated annual report of Company – annually (CGSDD).

13	Media	• Constructive cooperation Favourable public opinion	Publications and informing on activity of Companyy, commercial interests	 Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Holding press conferences, providing press releases (GRCO); Holding Poll on disclosure of essential subjects - annually (CGSDD); Informing by means of participation of the management Obshchesva as the speaker at conferences, forums, etc on a constant basis (OCMB, MDD); Placement of reporting/information, protocols, etc. in terms according to the Resolution of National Bank No. 26 of January 28, 2016 "About the approval of Rules of placement on Internet resources of depositary of financial statements, stock exchange of information on corporate events, financial statements and auditor reports, lists of affiliates of joint-stock companies and also information on total amount of remuneration of members of executive body following the results of a year" (TCFD, ATAD).
14	Affiliates	Mutual cooperation	Commercial interests	 Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); Publications in media - on a constant basis (GRCO; in Depositary of financial statements - TCFD, ATAD).
15	Rating agencies, Independent Auditor companies	• Mutual cooperation	Commercial interests	 To rating agencies: 1. Providing information according to inquiries of the agencies - annually (TCFD). To the auditor companies: 1. Providing required information - on a semi-annual basis (ATAD) To all stakeholders: 1. Placement on the corporate website of Company / social networks of relevant public information on Company in process of its emergence - on a constant basis - (GRCO); 2. Publications in media - on a constant basis (GRCO; in Depositary of financial statements - TCFD, ATAD).