



Eurasian Group Limited Liability Partnership

APPROVED
General Director
S. Shakhazhanov
«04» October 2023

ENVIRONMENTAL PROTECTION

POLICY

**Astana
2023**



Eurasian Group LLP

Introduction

Developed by:

(process area, subdivision)

**Document Registration
Number:**

Approved:

(reason, date)

Order No. dd.

Enacted in place of:

(Document No., name)

original enactment

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1. Purpose of the document

1.1 This Environmental Protection Policy (hereinafter referred to as the Policy) establishes principles and criteria governing environmental protection activities.

1.2 Environmental protection management based on the principles and commitments specified in this Policy shall be carried out in accordance with the Environmental Protection Management Regulations.

1.3 The Policy is developed in accordance with applicable laws and internal documents of the Group Company.

1.4 Compliance with the requirements of this Policy is mandatory for all employees of the Group Company in the Kazakhstan region, suppliers, contractors and counterparties.

1.5 Anything not specified in the Policy shall be guided by the relevant internal regulatory documents of the Group Company and applicable regulations of the Republic of Kazakhstan.

2. Terms, definitions and abbreviations

2.1 Terms and definitions

The following terms with their respective definitions apply in this Policy:

2.1.1 **Group Companies** means ERG or any of its direct and indirect subsidiaries over which ERG exercises control.

2.1.2 **Division** means a division within the structure of the Head Office that consolidates for management purposes the Assets based on products produced (Chromium, Iron, Coal, Energy, Aluminum).

2.1.3 **Asset (of the Division)** means a structural unit managed by the Division or functional vertical.

2.1.4 **Head Office** means Eurasian Group LLP

2.1.5 **General Director** means Head of Group Company;

2.1.6 **Region** means the territory defined by geographical criteria (e.g. Kazakhstan region)

Concepts, which are not disclosed in paragraph 2.1 of the Policy, are used in accordance with the meanings defined by the legislation of the Republic of Kazakhstan and/or internal regulatory documents of the Group Company, as well as in the corporate glossary published on the portal.

2.2 Symbols and Abbreviations

The following abbreviations are used in this Policy:

2.2.1 **IRD** means internal regulatory document.

2.2.2 **HO** means Head Office

2.2.3 **ESG** means Environmental, Social, Governance

2.2.4 **EP** means environmental protection

3. Requirements (activity description)

3.1 General Requirements

3.1.1 This Policy is a document that defines the basic principles, goals and objectives in the field of environmental protection and expresses the official position of the General Director of the Group Company with regard to its role and commitment in ensuring a favorable environment in its operations areas.

3.1.2 The requirements and principles of this Policy shall be enshrined in the internal documents of the Group Company and supported through the implementation of systematic legal, organizational and technical measures.

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3.1.3 This Policy applies to all activities of the Group Company that directly or indirectly affect the environment.

3.1.4 The Policy incorporates the best domestic and international practices in the field of environmental protection.

3.1.5 The Policy is aimed at preventing and minimizing the negative environmental impact of the Group Company's operations.

3.2 Basic Principles

3.2.1 Vision

3.2.1.1 The Group Company's vision is to minimize environmental impact through effective management in the design, construction, operation, maintenance and closure of all our assets (divisions) in an environmentally responsible manner.

3.2.1.2 We believe that sound management of environmental issues is fundamental to overall and responsible operational management and a source of competitive advantage.

3.2.2 Guiding Principles

3.2.2.1 Management commitment: Group Company managers at all levels of management are engaged and committed to improving environmental performance.

3.2.2.2 Pro-active approach: use effective risk-based planning and establish a production system with clearly defined environmental safety roles and obligations.

3.2.2.3 Awareness and prompt communication: immediate response and escalation of key risks. Involvement of all employees in the process of raising the level of environmental protection.

3.2.2.4 Regulatory approach: consolidation of the process and unified methodology of environmental management.

3.2.2.5 Improvement of environmental activities: identification, analysis, management and minimization of industrial and environmental risks threatening the environment associated with the Group Company's operations. Introduction of advanced and safe, energy- and resource-saving, environmentally friendly and low-waste technologies as part of the Group Company's Environmental Strategy.

3.2.2.6 Continuous improvement of the system and development of competencies in the field of environmental management: use of best practices and management methods, provision of necessary training, methodological support, develop skills and competencies of the Group Company's employees in the field of environmental protection.

3.2.2.7 Integrated approach: incorporate environmental issues into the decision-making process. Strive to use natural resources sparingly and, where possible, use recyclable materials. Avoid products and activities that may have a negative impact on the environment.

3.2.2.8 Ensure full compliance with environmental legislation and other environmental requirements applicable to the Group Company's operations, including international law.

3.2.2.9 Strategic approach to sustainable development: embedding sustainable development principles into the Group Company's overall strategy and decision-making processes. Develop a long-term corporate ESG strategy, including the development of ESG targets, among them targets for the reduction of greenhouse gas emissions, emissions and discharges of pollutants into the environment, as well as waste generation and disposal.

3.2.3 Liabilities

3.2.3.1 Comply with all relevant legal and internal requirements of the Group Company.

3.2.3.2 Ensure that General Directors are held accountable for environmental improvements and that resources are allocated to these functions.

3.2.3.3 Ensure that all employees understand their environmental responsibilities and demonstrate, through their own actions, commitment to the Vision.

3.2.3.4 Develop, implement and maintain a recognized environmental management system and programs for appropriate and consistent implementation of this Policy across Group Companies.

3.2.3.5 Ensure reliable assessment for implementation of the Policy and management system in the field of environmental protection through regular audits and analysis of achieved results.

3.2.3.6 Encourage effective participation, and improve the competence of employees, contractors, and stakeholders in the Group Company's environmental issues and programs through training, communication, and regular reporting.

3.2.3.7 Ensure that environmental issues are considered as an integral part of business planning and decision-making processes.

3.2.3.8 Prevent and/or reduce any potentially negative environmental impacts, including by complying with relevant international standards.

3.2.3.9 Analyze risks and opportunities for Group Companies in Kazakhstan related to transition to a low-carbon economy.

3.2.3.10 Disclose information on compliance with the principles of sustainable development, achievement of ESG goals in accordance with the requirements of industry standards, regulatory requirements of the European Union, as well as the requirements of creditors and independent rating agencies.

3.2.3.11 Carry out open and transparent two-way communication on environmental issues with all interested stakeholders.

3.2.3.12 Ensure environmental safety and sustainable use of natural resources in order to preserve them for future generations.

3.2.3.13 Implement modern trends in greening the team, introduce and train employees of the Group Company in the principles of “green office”.

4. Liability

4.1 Employees of the Group Company shall bear disciplinary responsibility for violation of this Policy in accordance with the procedure established by the current legislation of the Republic of Kazakhstan and internal documents of the Group Company.

4.2 The responsibility for control over fulfillment of this Policy shall be vested in the environmental protection divisions of the Group Company.

