

## Almaty Railway Bypass Project – Environmental and Social Action Plan – April 21, 2025

Item	Action	Completion Indicator	Timetable
1	<p><b>Operational ESMS.</b></p> <p>(i) KTZ will revise its corporate ESMS to align it with IFC PSs, particularly in contractor management, construction supervision and oversight requirements outlined in IFC Good Practice Note on Management of Contractors’ Environmental and Social Performance, as well as O&amp;M phase EHS Good International Industry Practice (GIIP) as specified in the World Bank Group EHS Guidelines for Railways including but not limited to in relation to operational rail safety management systems and will include monitoring requirements with relevant parameters and indicators, consistent with operations phase E&amp;S management plans.</p> <p>(ii) KTZ, in line with its updated corporate ESMS, will develop and implement operational E&amp;S management plans and procedures for the project before commencement of the railway bypass line including assigned roles and responsibilities. This will include, but not be limited to, an Emergency Preparedness and Response Plan (EPRP), a Spill Management Plan, a Waste Management Plan and a Security Management Plan as detailed under related sections in the ESRS.</p>	<p>Corporate operational ESMS of KTZ approved by IFC and AIIB.</p> <p>Operational E&amp;S management plans and procedures approved by IFC and AIIB.</p>	<p>In six months after signing December 31, 2025</p> <p>Four months prior to commencement of operation. August 31, 2026</p>
2	<p><b>Construction ESMS.</b></p> <p>(i) KTZ will develop a Construction Supervision Management Plan (CSMP) including regulatory ESHS requirements and check and control mechanisms for the implementations of the IFC PS aligned ESMP by the EPC contractor with clearly identified roles and responsibilities. CSMP will also include monitoring requirements for the workers’ accommodation camps per the Construction Camp &amp; Workers Accommodation Guideline included in CESMS including the inspection checklist to ensure that the accommodation of construction workers (contractors and sub-contractors) is in line with IFC and EBRD Good Practice Note on Workers’ Accommodation.</p> <p>(ii) KTZ will ensure that the EPC contractor has its own project specific construction phase Environmental and Social Management Plan (CESMP) compliant with IFC’s Performance Standards. The CESMP will align with the Construction ESMS included in the disclosure package, and include, but not be limited to, Managements Plans regarding: labor, safety and environment monitoring, including dust, noise and vibration measurements, inspection and reporting; safety hazards prevention and control; accident prevention; use of personal protective equipment; life and fire safety (L&amp;FS), emergency preparedness and response procedure; hazardous materials safety including asbestos management; electrical safety; excavation works; work at height, waste management; storm water, erosion control and wastewater management; first aid; EHS and OHS training programs; workers’ grievance mechanism; traffic management; and quarry sites</p>	<p>Construction Supervision Management Plan approved by IFC and AIIB.</p>	<p>July 30, 2025</p>

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	management and rehabilitation. KTZ will ensure that the management plans developed by the EPC contractor will also include relevant procedures applicable to the EPC sub-contractors, with assigned roles and responsibilities, including monitoring and supervision by the EPC	Construction ESMP of EPC contractor approved by IFC and AIIB.	
3	<b>E&amp;S Capacity.</b> (i) KTZ will include in its technical inspection team responsible for supervision of construction works at a minimum, one dedicated and qualified E&S expert and one OHS expert to provide oversight of the ESHS and OHS performance of the EPC and sub-contractors at the project site. (ii) KTZ will ensure that the EPC contractor will have a dedicated EHS manager and team with adequate technical knowledge of good international industry practice to implement the Construction Environmental and Social Management Plan (CESMP) and comply with project's requirements, consistent with IFC Performance Standards.	Composition of KTZ and EPC teams.  CVs and job descriptions of environmental and OHS experts approved by IFC and AIIB.  Official assignment letter or contracts of the experts submitted to IFC and AIIB.	July 30, 2025
4	KTZ will revise its HR policies and procedures to better address and define gender-based violence and sexual harassment (GBVH) and include disciplinary measures as well as definitions of prohibited behaviors in the Code of Conduct.	Revised HR policy and procedures approved by IFC and AIIB.	In six months after signing December 31, 2025
5	KTZ will restructure its grievance mechanism to allow employees and contractors to submit anonymous complaints and raise GBVH related grievances. This mechanism will be disclosed and communicated to employees, contractors and community members through trainings and awareness raising activities.	GRM procedure and Restructured GRM approved by IFC and AIIB.	In six months after signing December 31, 2025
6	KTZ will include work schedule adjustments for extreme heat and cold in its corporate operational OHS procedures and ensure that all workers are provided with and trained in the correct usage of PPE to address risks associated with extreme heat and cold.	Revised OHS procedures approved by IFC and AIIB.	In six months after signing December 31, 2025
7	<b>Operational Noise Management Plan.</b> (i) KTZ will undertake additional baseline noise measurements will be undertaken with longer period sound sampling and modelling according to planned train schedule to i) confirm the residential areas where significant operational noise impacts are predicted to occur along the railway; ii) inform the design of the noise barriers; and iii) identify additional measures to be taken including, but not limited to, noise enclosures for stationary noise generating equipment, speed restrictions and other operational measures	Additional baseline data	August 31, 2025

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	<p>in noise sensitive locations, replacement and regular maintenance of rolling stock and noise generating equipment.</p> <p>(ii) KTZ will develop an operational noise management plan, including mitigation measures to ensure that noise levels at properties near the project boundaries do not exceed noise thresholds specified in the WBG EHS General Guidelines and national noise standards.</p>	Operational Noise Management Plan approved by the IFC and AIIB.	April 30, 2026
<b>8</b>	KTZ, after implementation of mitigation measures identified in the plan, will commission a third-party noise expert to confirm the completion and implementation of mitigation measures identified in the plan before the commencement of operations and the third-party noise expert will also identify residual noise impact and propose further mitigation for adoption by KTZ if required.	Terms of reference, CV and contract signed with the third-party expert approved by IFC and AIIB.	Two months prior to commencement of operation. September 30, 2026
<b>9</b>	KTZ will integrate an operational noise monitoring plan in its operational ESMS, to monitor noise at sensitive receptors identified in the ESIA, and an operational noise mitigation plan to track changes in noise levels over time which will include an adaptive management protocol. The monitoring plan will include a community grievance mechanism to identify, track and respond to any local concerns regarding noise nuisance.	Operational Noise Monitoring and Management Plan approved by IFC and AIIB.	Two months prior to commencement of operation. September 30, 2026
<b>10</b>	<p>(i) KTZ will undertake a detailed Asbestos Containing Materials (ACM) survey by a specialized vendor as part of the refurbishment of the existing stations.</p> <p>(ii) In case that ACM is found, a dedicated ACM handling and disposal management plan will be prepared in line with GIIP.</p>	ACM survey report and ACM handling and disposal management plan approved by IFC and AIIB.	August 31, 2025  October 31, 2025
<b>11</b>	KTZ will undertake a needs assessment for additional overpasses and access roads for mitigating impacts of local community severance, regarding access to public services, agricultural lands, animal grazing fields and other nearby communities. This assessment will be done in consultation with the people affected in the project area, identify necessary design changes and implementation requirements for the construction contractor	Community severance mitigation plan approved by IFC and AIIB.	December 31, 2025
<b>12</b>	KTZ will develop and implement a transport and railroad traffic safety management plan which will identify necessary signalizations and warning signs and awareness raising among the residents of nearby settlements to minimize the risk of pedestrians near the railroad.	Transport and Railroad Traffic Safety Plan approved by IFC and AIIB.	Four months prior to commencement of operation. August 31, 2026
<b>13</b>	KTZ will commission a competent resettlement consultant and a team of experts to develop a Resettlement Action Plan (RAP) including a final Livelihood Restoration Plan (LRP) which will i) address the land survey and household level data gap related with the impacted 167 privately owned and 52 leased land plots including donated lands; ii) clarify the plots used for grazing and the users of these lands; iii) identify household level entitlements to	ToR and CV of resettlement consultant and team approved by IFC and AIIB.	June 15, 2025

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	compensation, allowances, assistance, and livelihood restoration measures; and iv) design implementation arrangements for the livelihood supports to be provided to affected households with an implementation organization and timeline. The RAP will be consistent with the Resettlement Action Plan Framework prepared within the scope of supplementary ESIA to ensure that the affected people were provided with additional payments to compensate the depreciated amount deducted from the compensation value, moving and transaction costs and the procedures to be followed for the physical relocation of these affected people including consultation and grievance mechanisms and assistance to be provided for the physically relocated people in Alatau city is compliant with IFC PS5 requirements. The consultant, within the scope of RAP, will also assess the land acquisition requirement for the 18 OHTLs to be diverted and develop necessary measures in line with IFC PS5 requirements and will be integrated into the RAP including LRP.	RAP including LRP approved by IFC and AIIB.	December 31, 2025
14	KTZ will ensure the workforce hiring plans for construction and operation phases of the project includes mechanisms for maximizing the employment of affected people where feasible based on workforce needs and skills required.	Workforce hiring plan approved by IFC and AIIB.	Two months after signing  August 31, 2025
15	KTZ will employ a competent social specialist who will be responsible for managing and coordinating the actions to be taken by the company and other entities within the scope of the RAP including LRIP in line with requirements of IFC. The specialist will also act as a Community Liaison Officer to liaise with GoK and local government offices, manage community grievances and undertake the necessary public consultation activities when needed during the implementation of RAP and LRP.	CV, ToR and contract of social specialist who will also act as CLO approved by IFC and AIIB.	In four months after signing  October 31, 2025
16	KTZ will hire an external consultant to monitor the implementation of RAP including LRP and provide reports on a quarterly basis.	CV, ToR and contract of external consultant approved by IFC and AIIB.	In four months after signing  October 31, 2025
17	At completion of the land acquisition and resettlement related plans and programs, the consultant will carry out a completion audit to verify the expected outcomes achieved as per the requirements of IFC PS5.	RAP and LRP completion audit report approved by IFC and AIIB.	<b>Condition for subsequent disbursement</b>  In one year after commencement of RAP and LRIP implementation in November 2025

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			December 31, 2026
<b>18</b>	KTZ will implement a Post-Construction Fatality Monitoring (PCFM) program to monitor bird flight activity, assess effectiveness of mitigation, and identify any further measures to be taken in line with an adaptive management approach.	PCFM approved by IFC and AIIB.	Four months prior to commencement of operation. August 31, 2026
<b>19</b>	KTZ will develop an operations-phase BMP which will include a Habitat Restoration Program for semi-desert, steppe grassland and riparian habitats, and associated priority biodiversity values. A qualified expert will be procured by KTZ to develop the Habitat Restoration Program, which will, at the minimum, include: (i) recommendations for restoration measures and opportunities to maintain biodiversity on-site; and (ii) a clear demonstration of how NNL will be achieved. The Company will coordinate with relevant stakeholders in developing and implementing the operations-phase BMP and Habitat Restoration Program, including local CSOs and other local experts, notably for measures to be implemented in the Sorbulak Lake System KBA/IBA as well as to explore opportunities to support conservation programs within the KBA.	Operations phase BMP approved by IFC and AIIB.	Four months prior to commencement of operation. August 31, 2026
<b>20</b>	KTZ will make sure that contractor workforce including sub-contractors were provided with necessary trainings on the identified archaeological sites around the project area and implementation requirements of the chance finds procedure and Kurgan Archaeological Landscape Mitigation and Management Guideline.	Minutes of training programs delivered to contractor workforce submitted to IFC and AIIB.	In four months after signing October 31, 2025