



KazMunaiGas

Summary

Activists, NGOs and community members have expressed concern about the following human rights allegations related to KazMunaiGas:

➔ **Corruption, Transparency and Freedom of the Press:**

Former president Nursultan Nazarbayev has been directly accused of corruption relating to KazMunaiGas activities in the case of the Tengiz oil field. In the scandal, known as Kazakhgate, U.S. courts found an American businessman guilty of channeling \$78 million of bribes from American oil companies to President Nazarbayev and the head of the oil ministry. Notably, Kazakhstan and its government bodies are regarded as highly corrupt. Furthermore, freedom of the press is severely restricted in Kazakhstan, and the media sector is closely watched by the state. In light of these restrictions, press stories that would portray KazMunaiGas in a negative light are likely stifled, creating a fertile environment for corruption. During 2018, Shell abandoned its plans to acquire a stake in KazMunaiGas over risks around corruption.

➔ **Abuses Related to Subsidiaries:**

Since KazMunaiGas exerts strong control over its subsidiaries, it is largely responsible for preventing and addressing human rights impacts that those subsidiaries contribute to or cause. On 16 December, Kazakhstan's Independence Day, the ongoing strikes at Zhanaozen became violent as security forces shot at unarmed protestors. Sixty-four people were killed and 400 people were wounded in the chaos, according to unofficial statistics. Numerous allegations of torture and ill treatment emerged during the following months. Other allegations include corruption, violation of union rights and violations of environmental regulation.



Country: **Kazakhstan**



Website



BHRRC company page

Human Rights Commitments

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➔ Abuses Related to Joint Ventures and Companies KMG Has Shares In:

KazMunaiGas holds shares in almost every major oil project in Kazakhstan. KazMunaiGas exerts control over these companies both through its shares and through its status as an operative arm of Kazakhstan's government. As such, the company has significant power to prevent and to address human rights issues, even when it is not the sole owner. Major issues include: the mass poisoning of children in Berezovka (Karachaganak Petroleum Operating); hundreds of deaths and thousands of illnesses related to Tengiz oil field (Tengizchevroil); risks that tens of thousands of residents in Atyrau could be exposed to mass poisoning (North Caspian Operating Company); criminal charges against labour activists (Mangistaumunaigaz); violations of union rights and retaliation against protesting workers (Karazhanbasmunai); and severe contamination of the environment (Kazgermunai).

KazMunaiGas has a number of publicly available policies related to health, safety and the environment. The company did not respond to our questionnaire of its human rights policies and commitments.

Company Information

KazMunaiGas, Kazakhstan's state-owned oil and gas company, has an interest in nearly all major oil projects within Kazakhstan. The company fully owns [Ozenmunaigas](#) and [Embamunaigas](#), and it has 50% interest in [Karazhanbasmunai](#), [Mangistaumunaigaz](#) and [Kazgermunai](#).² Additionally, it holds partial ownership in [Tengizchevroil](#), [Karachaganak Petroleum Operating](#) and [North Caspian Operating Company](#).

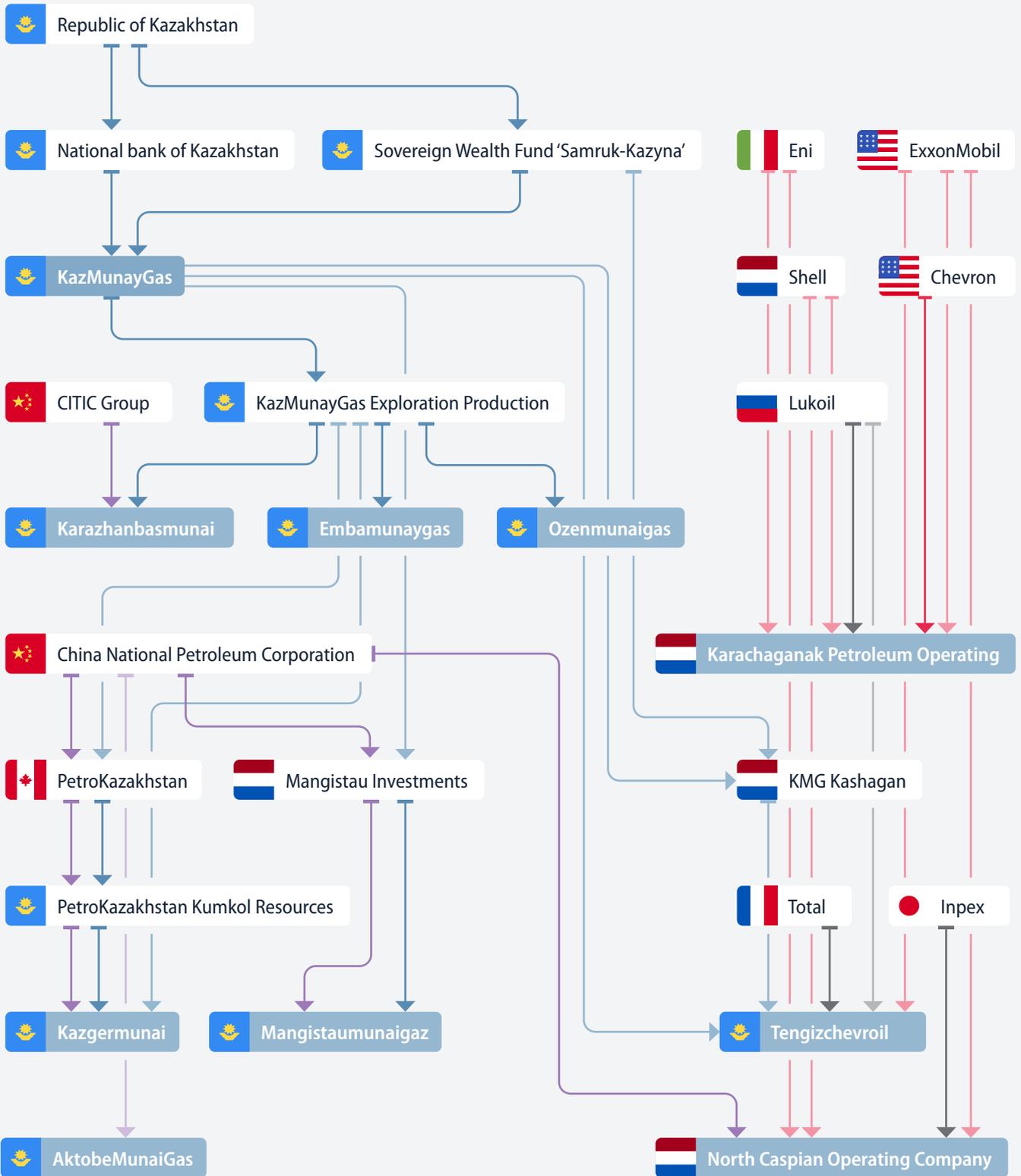
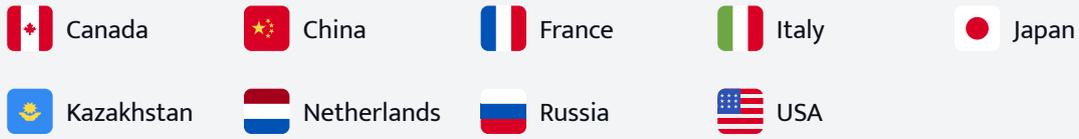
As the state oil company, KazMunaiGas has strong ties to government officials, including former president Nursultan Nazarbayev (see below).

- ⊕ [Water management policy](#)
- ⊕ [Rules for identifying hazards and risks in health, safety, and environment during high-risk work](#) (Russian)
- ⊖ The company **did not respond** to our questionnaire of its human rights policies and commitments

Human Rights Impacts

- ⚠ Health and safety
- ⚠ Environmental and water rights
- ⚠ Right to livelihood and adequate standard of living
- ⚠ Labour rights and wages
- ⚠ Access to information
- ⚠ Community, cultural and property rights
- ⚠ Abuses related to supply chain and business partners
- ⚠ Deaths and/or violence
- ⚠ Attacks on human rights defenders and labour activists
- ⚠ Corruption

COMPANY OWNERSHIP



Human Rights Allegations

Corruption, Transparency and Freedom of the Press

Former president, Nursultan Nazarbayev, has been directly accused of corruption relating to KazMunaiGas activities in the case of the Tengiz oil field. In the scandal, known as Kazakhgate, U.S. courts found an American businessman guilty of channeling \$78 million of bribes from American oil companies to President Nazarbayev and the head of the oil ministry. (See the [Tengizchevroil](#) profile for more information.) Until 2011, President Nazarbayev's son-in-law, Timur Kulibayev, held top management positions at KazMunaiGas and the sovereign wealth fund that oversees the company. Kulibayev went on to work as a director for Gazprom, where he was accused of skimming tens of millions in dollars from a gas pipeline between Central Asia and China. Shell's consultants found that Kulibayev continues to exert influence over KazMunaiGas.

As the state-controlled oil and gas company, KazMunaiGas works closely with other state bodies. Notably, Kazakhstan and its government bodies are regarded as highly corrupt. 17% of public service users report that they paid a bribe during the previous twelve months; this is down from 29% in 2016. At that time, respondents said that corruption is one of the biggest problems facing the country, many people pay bribes, and it is not socially acceptable to report corruption.

Furthermore, freedom of the press is severely restricted in Kazakhstan, and the media sector is closely watched by the state. Legislation from 2018 requires journalists to 'verify accuracy' of the information they intend to publish with relevant government bodies or officials. Likewise, the criminal code prohibits insulting the president and other officials. Authorities also restrict digital access to media outlets. In light of these restrictions, press stories that would portray KazMunaiGas in a negative light are likely stifled, creating a fertile environment for corruption.

KazMunaiGas has been categorised as 'absolutely intransparent' by Transparency International and the Revenue Watch Institute. This lack of transparency around decision-making and financial flows has cascading effects for corruption; Transparency International pointed out that, if capital flows were more transparent, opportunities for corruption would be lessened, and, consequently, more money would be available for socioeconomic development.

Nevertheless, the company claims it has a strong anti-corruption management policy. The company pointed to steps it had taken to reduce corruption, including anti-corruption training, introduction of basic compliance policies, establishment of a third-party hotline to receive complaints, due diligence of counterparties as well as the implementation of a conflicting interests declaration procedure. KazMunaiGas also states that all standard contracts with business partners include an anti-corruption clause. Notably, the report says that the conflict of interest policy 'is expected to be applicable to subsidiaries', which implies that the policy does not currently apply to subsidiary companies.

During 2018, Shell abandoned its plans to acquire a stake in KazMunaiGas over risks around corruption, and it advised KazMunaiGas of how to improve its corporate governance.

Abuses Related to Subsidiaries

Since KazMunaiGas exerts strong control over its subsidiaries, it is largely responsible for preventing and addressing human rights impacts that those subsidiaries contribute to or cause. Two KazMunaiGas subsidiaries have been included in this report, Embamunaygas and OzenMunaiGas.

For more information about the allegations and full sources, please visit the profile for each company listed.

Major rights issues related to [OzenMunaiGas](#) include:

- ➔ **Deaths of Labour Rights Activists and Attacks on Human Rights Defenders:** In August 2011, during the leadup to the events at Zhanaozen, two individuals connected to the OzenMunaiGas strikes were killed. Zhaksylyk Turbaev was murdered on company territory while on his way to an election for an union chairman. Additionally, dozens of striking workers and their supporters were killed during the unrest on 16 December 2011.
- ➔ **Zhanaozen Strikes and Violence:** Although many of the below actions were taken by state authorities and not by the company itself, it is important to note that Ozenmunaigas is a subsidiary of KazMunaiGas, the state oil and gas company, and, as such, it is closely intertwined with government officials. On 16 December, Kazakhstan's Independence Day, the ongoing strikes in Zhanaozen (see above) became violent as security forces shot at unarmed protestors. Sixty-four people were killed and 400 people were wounded in the chaos, according to unofficial statistics. The police violence appeared premeditated, according to some witnesses. In the following months, many of those involved in the protests disappeared or turned up dead.
- ➔ **Detention and Torture of Striking Workers and Witnesses:** Authorities prosecuted dozens of outspoken oil workers and government critics, nearly all of whom were convicted. Journalists and opposition politicians were arrested for alleged involvement in the strikes, even without evidence. Numerous allegations of torture and ill treatment emerged during the following months. Roza Tuletaeva, a worker at Ozenmunaigas who had been actively involved in the prior labour dispute, said she was repeatedly suffocated with a plastic bag. Others died after being beaten while in police custody. Witnesses were allegedly coerced, threatened and tortured into giving false testimony against the striking workers. Many people are still missing.
- ➔ **Access to Information and Freedom of the Press:** Authorities were accused of blocking credible reporting about the labour dispute, which made it difficult for striking oil workers to convey their message to workers in other sectors. Authorities shut down some of the country's best-known independent and opposition media outlets after they provided extensive coverage of the events at Zhanaozen. Legislation from 2018 requires journalists to 'verify accuracy' of the information they intend to publish with relevant government bodies or officials; this presents obstacles to accurately reporting about Ozenmunaigas, which is owned by the state.

Rights Allegations Related to [Embamunaygas](#) Include:

- ➔ **Corruption:** Embamunaygas was accused of corruption in an anonymous letter from 2013. During 2010, workers said they were enrolled in the ruling Nur Otan political party without their knowledge or consent.
- ➔ **Unions and Labour Rights:** Allegedly, more than 5,000 workers were forced to join a particular trade union under threat of 'deprivation of social benefits'. During 2010, workers requested a pay increase due to hazardous working conditions. The workers sought to create their own independent trade union, accusing the official union of not supporting their interests. Workers also said they had not received an employment contract which is in violation of the law.
- ➔ **Environmental Degradation and Pollution:** Within the span of a year and a half, the company burnt at least 1.3 million cubic meters of raw gas with high sulphur content. Concerningly, sulphuric gases can be highly toxic for the human body. A 2016 inspection found forty-three violations of environmental law.

See the company profiles for [Ozenmunaigas](#) and [Embamunaygas](#) for more information.

Alleged abuses related to Joint Ventures and Companies KMG Has Shares In

KazMunaiGas holds shares in almost every major oil project in Kazakhstan. KazMunaiGas exerts control over these companies both through its shares and through its status as an operative arm of Kazakhstan's government. As such, the company has significant power to prevent and to address human rights issues, even when it is not the sole owner.

Only one of the top ten oil companies in the country—[Aktobemunaigas](#)—is not related to KazMunaiGas. Even so, KazMunaiGas and Kazakhstani authorities are intimately connected with Aktobemunaigas' parent company, the state-owned China National Petroleum Corporation (CNPC). CNPC and KazMunaiGas jointly own Kazgermunai and Mangistaumaunai. Both also hold shares in North Caspian Operating Company. KazMunaiGas and another state-owned Chinese company, CITIC (China International Trust Investment Corporation), jointly own Karazhanbasmunai.

Western companies—including ExxonMobil (USA), Shell (Netherlands), Chevron (USA), Total (France) and Eni (Italy)—hold major shares in Karachaganak Petroleum Operating, Tengizchevroil and North Caspian Operating Company. Lukoil (Russia) and Inpex (Japan) also have an interest in those companies. (Not every parent company holds shares in every Kazakhstani company mentioned; check profiles for exact details of ownership.)

For more information about the allegations and full sources, please visit the profile for each company listed.

ALLEGATIONS RELATED TO [KPO](#) INCLUDE:

- ➔ **Mass Poisoning of Children and Resettlement of Berezovka:** Nineteen children and three teachers all simultaneously lost consciousness on 28 November 2014. Other villagers had also passed out the day before; thirty-one people were affected within two days. Over the course of the next six months, the episodes continued. The children were not diagnosed, and their health worsened. Finally, in July 2015, the government announced the village would be relocated and that KPO would pay the bill. However, the government claimed that the resettlement was due to the expansion of activities at the oil field, and that it was not due to the mass poisoning. The children's symptoms persisted for years, but state-funded hospitals refused to diagnose them. Private medical experts eventually diagnosed the victims with toxic encephalopathy as a result of exposure to toxic fumes from the oil field. Neither KPO nor the Kazakhstani state authorities have taken responsibility for the tragedy nor have compensated the children for the significant damage to their health.
- ➔ **Berezovka: Complaints to the World Bank about Impacts on the Community:** The residents of Berezovka, a village near Karachaganak, had repeatedly raised alarms about the impacts of the oil field upon their community long before the 2014 mass poisoning. Kazakhstani law requires a minimum of five kilometers between residences and the Karachaganak oil field. However, the company convinced the government to reduce the protective zone to just three kilometers. By 2004, 45% of Berezovka residents suffered from chronic health problems, including cardiovascular problems, chronic illnesses, memory loss, vision loss, muscular-skeletal problems, tooth loss, respiratory illness and gastroenterological problems. Blood samples taken by an independent laboratory in 2004 indicated villagers were exposed to hydrogen sulphide and other toxins associated with oil production. Sinkholes also opened up in and around villagers' homes. Because of these impacts, villagers actively sought resettlement for years, but they were repeatedly denied. Activists repeatedly complained to the World Bank and to the International Finance Corporation with no results.

ALLEGATIONS RELATED TO TENGIZCHEVROIL INCLUDE:

- ➔ **Corruption:** Although company officials say that they are taking steps to fend off corruption—a major problem for businesses in Kazakhstan—the company has a history of corruption scandals, including ‘Kazakhgate’. President Nursultan Nazarbayev and the head of Kazakhstan’s oil ministry received more than \$78 million USD of bribes in exchange for giving U.S. companies access to oil reserves, including Tengiz. Tengizchevroil’s strong political connections have allegedly helped the company escape serious consequences for illegal activity.
- ➔ **Deaths and Health Impacts:** Hundreds of deaths and thousands of illnesses have been linked to Tengiz, according to local community members. According to an anonymous witness, ‘If, according to official data, since 1993, 250 workers died here, then that figure is an underestimate. They only count those who died at work. And how many people died from hydrogen sulfide poisoning at home? After all, there were many cases when people returned from their shift, fell asleep and never woke up’. In the village of Sarykamys, the site of a shift worker camp, doctors said that 90% of the village was sick and that the average life expectancy was only forty-six years.
- ➔ **Environmental Degradation and Pollution:** The Tengiz oil field has been characterised by emergency situations as one that has caused catastrophic harm to the environment and to the health of local communities. According to Crude Accountability, Tengizchevroil is the main polluter in the Atyrau Oblast. Allegedly, between 1993 - 2011, Tengizchevroil released more than one million tons of harmful substances into the atmosphere, including highly toxic sulphurous gases. During 2012, an academic raised concerns that the company had not conducted a new environmental impact assessment in fifteen years, even though the level of emissions had increased significantly.
- ➔ **Resettlement:** In Sarykamys village, 189 people—aged twenty-four to fifty-three—died since development began at Tengiz, out of a population of 3,450. This is the equivalent of 5.5% of the entire population. During 2002, the government of Kazakhstan ordered the resettlement of Sarykamys away from Tengiz oil field; this is in recognition of the adverse impacts for health and the environment. Villagers complained that they were not fully compensated for their losses, and that they did not receive land proportionate to what they had owned in the village.
- ➔ **Labour Rights, Occupational Safety, and Unions:** According to some estimates, more than 250 workers have died since the start of the field’s development. Workers at Tengiz have expressed dissatisfaction with various conditions over the years, primarily related to low wages, discrimination, arbitrary dismissal and poor living conditions. The company, allegedly, does not intervene in cases of rights violations that its contractors contribute to or cause. Tengizchevroil and its contractors have also faced persistent accusations of interfering with union rights.

ALLEGATIONS RELATED TO NORTH CASPIAN OPERATING COMPANY INCLUDE:

- ➔ **Health Impacts on Workers and Local Communities:** NGOs and activists have raised alarms that residents of the Atyrau region are at significant risk of exposure to poisonous substances. The U.S. Agency for Toxic Substances and Disease Registry has classified hydrogen sulphide as a neurotoxin, and intense exposure to it can cause death or severe illness. Long-term exposure can lead to brain damage, permanent memory loss, vision problems, nausea and headaches. Top medical staff at the region have expressed fear that, if an accident were to occur at Kashagan, tens of thousands of people living in Atyrau could be killed or severely impacted by toxic gas emissions. Common problems in the area include cardiovascular illness, blood disease, premature births, respiratory illness and stillbirths. Children have experienced skin diseases, made worse by bathing in the Caspian Sea. Residents have also expressed difficulty accessing healthcare.

- ➔ **Environmental Degradation and Pollution:** Just a few weeks after production began at Kashagan, a major leak prompted an emergency shutdown. NCOC promised to install air monitoring centers near its processing facilities and Atyrau; however, as of 2007, these facilities evaluated only the levels of two hazardous pollutants, rather than the nine recommended by environmental experts. The company allegedly did not allow the government or researchers to conduct independent monitoring. NCOC has also been accused of improperly dumping toxic wastewater into the municipal sewage system. The wastewater contained toxic substances in concentrations tens to hundreds of times above the maximum permissible concentration. The company had not even begun construction of a wastewater management facility by 2012, twelve years into project development which is in violation of the Kazakhstan Water Code. In another incident, the company was found to dump wastewater into salt steppe lakes, which posed significant risks of leaking into the Caspian Sea. Pollution, emissions and disturbances from Kashagan have contributed to the mass die-offs of marine life in the Caspian Sea.
- ➔ **Socioeconomic Impacts and Right to Livelihood:** Villagers reported drops of their fish catch and skin diseases on the fish they did catch, making them unmarketable. This has presented considerable threats to livelihood, since, in some villages, 40% of the population had been employed in the fishing industry. While the Kashagan project has provided some employment opportunities to make up for these losses, critics say that residents face inadequate means to sustain their families. Even when employment opportunities are available, they often are not given to local workers. While the production sharing agreement between NCOC and the government of Kazakhstan requires the company to carry out social and infrastructure projects, civil society groups say that there is little, if any, public participation with designing, implementing or monitoring these projects. One company-built school was located far from the community it was meant to serve, with no means of public transportation; as a result, children sleep on the floor of the school from Monday until Saturday.
- ➔ **Labour Rights and Occupational Safety:** Workers have expressed that they feel weak and sleepy, symptoms of exposure to toxic gases. NGOs also told Friends of the Earth about cases of workers dying in their sleep. 500 Turkish workers were allegedly poisoned at the Karabatan-Bolashak facility, according to a trade union representative.
- ➔ **Access to Information:** Environmentalists have criticised NCOC for failing to release all available information about the environmental, social and health impacts of the Kashagan oil field. Residents near the Bolashak processing facility, which deals with dangerous sulphurous compounds, say that they were never informed about risks to their community, particularly related to toxic gases. The region's official medical staff told Friends of the Earth that there is a low awareness about the potentially catastrophic impacts of oil development on the Caspian Sea. Additionally, the production sharing agreement between NCOC and the Kazakhstan government is not available, leaving the exact terms of the contract unknown.

ALLEGATIONS RELATED TO MANGISTAUMUNAIGAZ INCLUDE:

- ➔ **Persecution of Labour Rights Activists:** Union activists connected to the company have faced persistent persecution and legal battles. Workers who protested Mangistaumunaigaz have been found guilty of criminal charges and ordered to pay 'damages' to the company. Others have been fired, as hunger strikes are a 'violation of labour regulations'.
- ➔ **Pollution and Environmental Degradation:** An oil fire erupted at the Kalamkas field during 2019, following a water and gas leak several weeks prior. Notably, the company had not informed the authorities about the leak; critics say the company was trying to hide the incident. Atmospheric pollution exceeded maximum permissible concentrations of formaldehyde, methane, ammonia, hydrogen sulphide, phenol and soot. Notably, all of these substances are highly toxic and can poison the human body.

- ➔ **Health Impacts and Access to Information in Local Communities:** Villagers in Zhetibay say oil-filled sludge has been dumped near their community, causing negative health impacts for the area. About 245 residents have disabilities; residents say this is because of the poor environment which is related to oil activity. One activist collected signatures from local residents as part of a letter to inform the president of Kazakhstan about the conditions. Allegedly, police and the local mayor visited the residents who had signed the letter and forced them to retract their signatures.

ALLEGATIONS RELATED TO [KARAZHANBASMUNAI](#) INCLUDE:

- ➔ **Lead-Up to Zhanaozen:** Labour Rights and Freedom of Association: Employees believed the union chairman did not represent workers' interests, after he agreed with company management to terminate a wage dispute, without informing union members beforehand. This sparked outcry from workers. A group of men, aged twenty-to-forty, including the union chairman, beat several union members, seemingly in retaliation for their activism within the trade union. The workers elected a new representative, but the company insisted it would only work with the former chairman. It refused to acknowledge the election results. The workers started a strike to demand that the company increase wages, to hold negotiations for the collective agreement, and to allow the new union leadership to access company territory without interference.
- ➔ **Attacks and Criminal Proceedings Against Striking Workers:** Karazhanbasmunai filed a complaint at court about the strike, declaring it illegal. The company filed complaints against eight workers; the workers did not receive a fair trial, and they were found guilty. Despite the rulings, the strikes continued. The homes of multiple union leaders were vandalised, with one set on fire. Karazhanbasmunai employees then joined Ozenmunaigas workers at protests in Zhanaozen.
- ➔ **Zhanaozen Strikes and Violence:** On 16 December, Kazakhstan's Independence Day, the ongoing strikes in Zhanaozen (see above) became violent as security forces shot at unarmed protestors. Sixty-four people were killed and 400 people were wounded in the chaos, according to unofficial statistics. In the following months, many of those involved in the protests disappeared or turned up dead. Authorities prosecuted dozens of outspoken oil workers and government critics, nearly all of whom were convicted. Numerous allegations of torture and ill treatment emerged during the following months. See information about KazMunaiGas subsidiary Ozenmunaigas (above) for more information.

ALLEGATIONS RELATED TO [KAZGERMUNAI](#) INCLUDE:

- ➔ **Labour Rights:** During 2011, Kazgermunai was fined for violating workers' rights and labour standards. Retired workers did not receive payments that they were owed as part of their employment contract. Additionally, employee contracts did not include enough information about wages and remuneration which is in violation of Kazakhstan's labour code.
- ➔ **Environmental Degradation and Pollution:** Kazgermunai has received several fines for violations of environmental law. During 2020, the regional department of ecology found gross violations of the law, including that the company operated without a permit for emissions.

Human Rights Commitments

KazMunaiGas and KMG E&P have a number of publicly available commitments and guidelines related to the environment, labour and human rights, including:

- ➔ [Occupational health and safety policy](#)
- ➔ [Collective agreements](#)
- ➔ [Collective agreement form](#)
- ➔ [Anti-corruption](#)
- ➔ [Sustainable development policy](#)
- ➔ [KMG ombudsman](#)
- ➔ [Conciliatory Commission for Settling Individual Labour Disputes and dispute settlement agreement](#)
- ➔ [Code of corporate social responsibility](#)
- ➔ [Environmental policy](#)
- ➔ [Emission management policy](#)
- ➔ [Policy on safe operation of land transport vehicles](#)
- ➔ [Water management policy](#)
- ➔ [Rules for identifying hazards and risks in health, safety and environment during high-risk work](#) (Russian)

The company's occupational health and safety policy states: JSC NC 'KazMunayGas,' and its subsidiaries and affiliates (the Company) establish the top priority of life and health of their employees, prevention of hazardous production factors in occupational health and safety (hereinafter referred to as 'OHS') over the operating results. The Company applies the principle of zero tolerance of losses and damages associated with accidents and breakdowns. For the purpose of this Policy, the Company's management assumes the following obligations to fulfil and require their fulfilment by its contractors:

- ➔ Complying with the legislative requirements of the Republic of Kazakhstan, international and national standards, internal documents on OHS.
- ➔ Demonstrating leadership and commitment of the top management to OHS; actively involving every employee in the development of a safety culture, when every employee is aware of the responsibility for their personal safety and the safety of those around them.
- ➔ Encouraging, developing and disseminating the best practices and experience in OHS both within the Company and among the contractors and stakeholders.
- ➔ Ensuring the identification and elimination of hazardous production factors related to OHS at all operating stages.
- ➔ Ensuring safe and healthy working conditions to prevent injuries and deterioration of the employees' health.
- ➔ Increasing competence and training employees in OHS across all management levels of the Company.
- ➔ Providing communication and advice on OHS issues between all Company's employees, contractors and stakeholders.
- ➔ Providing employees with guarantees of the legal right to refuse to perform work in the event of a situation that reasonably poses a threat to the life and health of employees or people around them.

- ➔ Providing timely notices of accidents to the stakeholders and investigating accidents in accordance with the legislation of the Republic of Kazakhstan and the Company's internal documents.
- ➔ Increasing the efficiency of personnel response and the operational readiness of the Company's production facilities to contingencies and emergencies.
- ➔ Ensuring transparency, openness and reliability of information on the Company's activities in OHS, their content and operational responsiveness.
- ➔ Ensuring continuous improvement of the OHS management and scorecard system by allocating duties and responsibilities; providing powers for its maintenance and effective operation.

The company's environmental protection policy states: KazMunayGas and its subsidiaries and affiliates (hereinafter: the Company) are committed to sustainability principles and, therefore, environmental protection and adverse environmental impact mitigation are the main priorities of their activities. The Company follows the principle of zero tolerance for losses and damages caused by environmental pollution. In compliance with this Policy, the Company's management is committed to the following principles and requires the same from the contractors:

- ➔ Strictly comply with the requirements of the legislation of the Republic of Kazakhstan, international and national environmental standards and internal documents.
- ➔ Secure preference of preventive environmental impact mitigation over emergency response and remediation actions.
- ➔ Take all reasonable actions for climate and biodiversity preservation, contaminated land reclamation, and environmental remediation of license territory after subsoil use right is terminated.
- ➔ Take actions to achieve zero flaring and reduce direct and indirect emissions to the environment.
- ➔ Make a comprehensive environmental impact assessment (EIA) of the Company's production asset, from the construction to decommissioning stage, which should be informed to the public and stakeholders and the relevant information should be published in open sources.
- ➔ Make additional strategic EIA and risk assessment of large-scale infrastructure projects or operations in environmentally sensitive areas, and take into account the views and interests of stakeholders.
- ➔ Ensure trouble-free operation of all equipment and pipelines in order to minimise the risks of environmental pollution in the event of an accident or oil spill.
- ➔ Not run operations in specially protected natural areas of special value as ecosystem for rare, threatened and endangered species.
- ➔ Consider the impact on biodiversity and preserve animal migration routes, when planning and running production operations.
- ➔ Prevent illegal hunting, fishing and other use of flora and fauna by their employees, as well as employees of contractors and subcontractors on license territories.
- ➔ Compensate in full the damage to the environment caused by the adverse impact of the Company's operations.
- ➔ Enhance the energy efficiency of operational processes and manage the efficient use of resources based on monitoring, measurements and analysis of key characteristics of the energy management system.
- ➔ Adopt and follow the principles of a Green Office.
- ➔ Provide open communications, awareness and regular reporting about material environmental aspects of the Company's operations to the public, shareholders, authorised environment governmental body and other stakeholders.
- ➔ Secure continuous enhancement of the environmental management system and indicators based on effective duties distribution and accountability, as well as delegation of authority for its effective maintenance and operation.

KazMunaiGas did not respond to our questionnaire of its human rights policies and commitments.