National Company Kazakhstan Temir Zholy JSC



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Guidelines for the Health and Safety Management System in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries

Version 2.0

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1. Introduction

- 1. Guidelines for the health and safety management system in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries were developed in accordance with the requirements of the Corporate Standard for Industrial Safety Management for Portfolio Companies of Samruk-Kazyna JSC, an international standard ISO 45001 "Health and Occupational Safety Management Systems" and interstate standard GOST 12.0.230 "Occupational Safety Standards System. Occupational Safety Management System. General Requirements" and is the main document that regulates the activities of managing health protection and ensuring occupational safety in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries (hereinafter referred to as NC KTZ JSC and its subsidiaries).
- 2. The health and safety management system is aimed at achieving safe working conditions, reducing cases of occupational diseases and sudden deterioration in health in the workplace of employees of NC KTZ JSC and its subsidiaries, contractors, visitors and other interested parties who are affected by influence of hazards associated with the activities of NC KTZ JSC and its subsidiaries.
 - 3. The Guidelines apply to NC KTZ JSC and its subsidiaries.
- 4. The Guidelines are mandatory for execution by all employees of NC KTZ JSC and its subsidiaries.

2. Concepts and abbreviations

5. The following basic concepts and abbreviations are used in these Guidelines:

NC KTZ JSC, Company – National Company Kazakhstan Temir Zholy JSC;

Audit – a systematic, independent, and documented process of obtaining objective evidence and its objective assessment in order to determine the degree of compliance of the audited object with established requirements;

Safety – absence of unacceptable risk;

Occupational safety and health – the state of protection of workers, ensured by a set of measures that exclude the impact of harmful and (or) hazardous production factors on workers during their work activities (including industrial and electrical safety);

OSH – occupational safety and health;

Process owner – a manager at a level not lower than the director of a branch of the Company or the head of a subsidiary organization, who manages the process within the framework of his powers, who has at his disposal all the necessary resources to carry out the process (personnel, equipment, tools, production environment, information, powers and competencies and etc.), and responsible for the effectiveness and efficiency of the process;

Internal control – includes organizing monitoring of the state of labor safety, conducting operational analysis of internal control data, assessing risks and taking

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measures to eliminate detected inconsistencies;

SDH – a sudden deterioration in the health of an employee at the workplace;

NC KTZ JSC Group – NC KTZ JSC and its subsidiaries;

Subsidiaries – legal entities, 100% of shares (participatory interests) of which belong to NC KTZ JSC under the right of ownership or trust management;

ISPB – ACS "Integrated System for Industrial Safety";

Work permit – a written order for the safe performance of work, defining the content, place, time and conditions of its implementation, the necessary safety measures, the composition of the team and persons responsible for work safety;

Zero injuries (Vision Zero) - an approach to organizing prevention that combines three areas; safety, occupational health and well-being of workers at all levels of production;

Key performance indicators (KPIs) – a fundamental element in the process of assessing the performance of managers. KPI is an indicator that characterizes the degree of achievement of set goals;

Root causes – factors related to management, such as deficiencies in the management system that influenced the occurrence of an accident or incident;

Corrective action – an action taken to eliminate the cause of the nonconformity and prevent its recurrence;

Rate of fatal accidents due to sudden deterioration of health (RIHWF) — the number of fatal accidents due to deterioration of health that occurred in the last 12 months, multiplied by 1 million man-hours and divided by the total number of manhours worked (in the last 12 months);

Lost time injury rate (LTIR) – the number of people injured (including fatalities) in lost time accidents that occurred in the last 12 months, multiplied by 1 million man-hours and divided by the total number of man-hours worked (over last 12 months);

EEBSD coefficient – the level of personnel involvement in the work safety standards;

APSR coefficient – level of awareness of existing risks;

Safety culture - a set of characteristics and features of the activities of organizations and the behavior of individuals, which establishes that safety issues, as having the highest priority, are given attention determined by their significance;

Object – buildings, structures, premises, artificial structures, railway rolling stock, special rolling stock and other objects related to the technological process;

Hazard – a source, situation or action characterized by the potential to cause harm to people, the environment, property or reputation of the group of companies of NC KTZ JSC;

Stopping unsafe work – the process of exercising the right to stop work and involves stopping, notifying, correcting and resuming work in order to solve the existing problem;

Network level division – a division of the Company/subsidiary that is directly subordinate to the management of the Company/subsidiary in accordance with the

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local act of the Company/subsidiary;

Regional level division – a division of NC KTZ JSC or its subsidiaries, the activities of which are coordinated by the network level division in accordance with the regulations on the network level division;

Line level division – a division of NC KTZ JSC or its subsidiaries, the activities of which are coordinated by a regional-level division in accordance with the regulations on the regional-level division;

Contracting organizations – a legal entity or individual who performs work, provides services or supplies goods and materials on the territory or in the interests of the Company in accordance with a contract (agreement) and which may influence the quality of industrial safety;

Behavioral safety dialogues (BSD) – observations in which managers at all levels, specialists of all categories, employee representatives and BIOS service workers visit production facilities, work sites, observe the actions of workers and discuss dangerous or safe work methods and involve workers in active compliance with industrial safety requirements;

Near Miss – an incident that did not result in injury or damage;

Proactive tools (**methods**) – an approach aimed at improving safety culture, as well as at preventing the manifestation of negative consequences on workers and the environment, through prompt and targeted elimination;

Occupational disease – an acute or chronic disease caused by exposure of an employee to harmful production factors in connection with the performance of his labor (official) duties;

Verification – a set of activities carried out to establish compliance of the real, true state of activity (work), production with the requirements of regulatory legal acts of the Republic of Kazakhstan, regulatory and technical documentation, standards and local acts of the Company in the field of health and safety;

Continuous improvement – the process of improving the health and safety management system to achieve improved performance indicators in the field of health and safety, consistent with the Company's policy in the field of health and safety;

Employee – an individual who is in an employment relationship with NC KTZ JSC or its subsidiary and directly performs work under an employment contract;

 \mathbf{Risk} – a combination of the likelihood of a hazardous event or exposure occurring during work and the severity of injury or other damage to human health caused by this event or exposure;

RK – Republic of Kazakhstan;

Health and safety management system - a set of interrelated or interacting elements that establish policies and goals in the field of health, safety and procedures

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for achieving these goals;

Structural divisions/SD – departments, services, departments of the central office, branches, assigned staff, representative offices of the Company, including those located outside the Republic of Kazakhstan;

3. Health and safety policy

6. In accordance with the Policy in the Field of Labor Protection and Industrial Safety of Samruk-Kazyna JSC, the Corporate Ideology and Business Philosophy, the Company undertakes obligations in the field of health and safety, namely, to ensure healthy and safe working conditions and effectively manage risks at workplaces, striving for conditions of Zero Injuries, preserving the life, as well as the physical and mental health of each employee.

The Company supports the identification and elimination by employees of hazards and risks in the field of health and safety, while guaranteeing the absence of negative consequences in relation to employees who take the initiative in matters of health and safety.

- 7. The Company encourages, applies, develops and disseminates best practices and experience in the field of health and safety, both within the Company and among contractors and stakeholders.
- 8. In accordance with the concluded agreements, the Company requires its contractors, clients and partners to comply with all standards and norms in the field of occupational safety and health adopted in the Republic of Kazakhstan and the Company.

4. Key performance indicators in the field of health and safety

9. KPIs are the basis for managing the efficiency of processes in the field of health and safety. KPIs must be a driver of efficiency and consistent with the Company's strategic goals.

The KPIs of executive employees are approved in accordance with the Rules for remuneration and bonuses for executive employees, employees of the Office of the Corporate Ombudsman, employees of the Office of the Corporate Secretary, the Internal Audit Service and the Compliance Service of JSC NC KTZ approved by a separate local act of the Company.

Calculation of efficiency is carried out in accordance with the Methodology for the formation of efficiency "Level of industrial safety" in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries.

The process of managing the health and safety system is assessed based on the following KPIs:

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POSITION	KEY PERFORMANCE INDICATORS (KPI)
Management of corporate, network, regional, line levels	LTIR – lost time injury rate RIHWF coefficient – the rate of fatal accidents due to sudden deterioration in health EEBSD coefficient – the level of personnel involvement in the BDS APSR coefficient – level of awareness of existing risks

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5. Organizational roles, responsibilities, and authorities

10. Responsibilities for health protection and occupational safety among the Company's management are determined by the Chairman of the Company's Management Board in accordance with the internal document on the distribution of responsibilities and areas of authority. In the 1st quarter of the year following the reporting year, the Chairman of the Company's Management Board reviews the state of health and safety for the past period (key indicators); in the 4th quarter, under his chairmanship, the Company holds an information day on occupational safety and health (forum, information session, public speech).

The Deputy Chairman of the Management Board of the Company manages the activities to improve the safety and health management system for the NC KTZ JSC group of companies.

Responsibilities in the field of health and safety of the Chairman of the Management Board, Deputy Chairman of the Management Board, Managing Directors, and Chief of Staff are defined in the Procedure for the distribution of responsibilities and areas of authority between the management of the National Company Kazakhstan Temir Zholy JSC, approved by the local act of the Company.

- 11. Maintaining the health and safety management system in the Company in working order, coordinating the activities of all structural divisions and subsidiaries of the Company in the field of health and safety is carried out as follows:
- 1) in terms of organizing and coordinating the Company's activities in the field of health and safety, ensuring a unified methodological basis for resolving issues within the framework of improving the management system of the Company's health and safety, taking into account the legislative requirements of the Republic of Kazakhstan, introducing best practices and approaches, as well as the specifics of the Company's activities, is entrusted to industrial safety service at the management level of the NC KTZ JSC group of companies;
- 2) in terms of compliance with the requirements of the corporate management system in the field of health and safety, on the owners of the processes of structural

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divisions and subsidiary companies of the Company, taking into account the coverage of managers at all levels ensuring the operational activities of the Company;

- 3) internal control over the implementation of the above requirements at the corporate level, to the Inspectorate for Labor Safety and Ecology; and at the network, regional, linear levels, to the OSH service.
- 12. Functional responsibilities regarding health and safety issues, the rights and responsibilities of each employee of the structural division and subsidiary of the Company are provided for in the job description, as well as in the local acts of the Company and the subsidiary, with which employees of the Company and the subsidiary must be familiar.

6. Consultations with employees and their participation in improving the health and safety management system

13. Consultations include a two-way exchange of information, including dialogue and exchange of opinions, which is achieved through functioning industrial safety and health councils, the corporate website and information portal of the Company, the use of ISPB in the form of a computer and/or mobile version, holding production meetings, creating work groups for identifying hazards and assessing risks in the field of health and safety, as well as through questionnaires of personnel in ISPB, incl. anonymous, and within the framework of industrial relations (IR) monitoring.

7. Legal and regulatory requirements

14. When developing, implementing and maintaining documentation, technical processes and internal procedures, process owners take into account the requirements in the field of health and safety of the legislative and regulatory acts of the Republic of Kazakhstan, as well as the requirements of the Company's local regulations.

The above requirements are summarized in the register of requirements of the legislation of the Republic of Kazakhstan, formed on the basis of a methodology for assessing the compliance of the activities of NC KTZ JSC and its subsidiaries with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety.

15. Documents containing the requirements of legislative and regulatory acts of the Republic of Kazakhstan, as well as the requirements of internal documents of the Company, before being included in the specified Register, must undergo the procedure for identifying regulatory legal acts and international standards, in accordance with the internal document of the Company, Document Management Rules.

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8. Formation of goals in the field of health and safety

- 16. For the Company, the main goal in the field of health and safety is to ensure safe and healthy working conditions.
- 17. Structural divisions and subsidiaries of the Company develop their own goals and objectives in the field of health and safety, the development of which takes into account:
 - 1) compliance with the Company Policy;
- 2) legislative and regulatory requirements and analysis of non-compliance with them;
- 3) results of hazard identification, risk and opportunity assessment obtained in accordance with the standard "Hazard identification, their assessment and risk management in the field of health and safety in NC KTZ JSC and its subsidiaries", approved by a separate local act of the Company;
- 4) analysis of the effectiveness of the Company's activities in the field of health and safety;
- 5) results of road safety regulations, analyses, stopping unsafe work and potentially dangerous incidents (Near Miss);
 - 6) financial and production capabilities;
 - 7) analysis of identified inconsistencies, incidents and complaints;
- 8) analysis of the results of monitoring the physical and mental health status of personnel, as well as the causes of cases of higher education;
 - 9) analysis of injuries, diseases, including occupational diseases;
 - 10) tasks to improve business processes;
 - 11) proposals from employees and other interested parties.
- 18. The goals of the health and safety management system must be significant, measurable and achievable, and have a time limit.
- 19. Before approval, goals must be agreed with the OSH service of a higher level of management of the Company group.
 - 20. Goals should be communicated to involved and interested parties.
 - 21. The basis for updating the goals of health and safety may be:
 - the degree of their achievement;
- changes in the requirements imposed by the legislation of the Republic of Kazakhstan;
 - shareholder requirements;
- changes in the process, vision and strategy of the Company in the field of health and safety based on the results of the activity analysis;
 - proposals from interested parties.

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9. Planning activities in the field of health and safety

- 22. To achieve goals in the field of health and safety, plans are being developed in the structural divisions and subsidiaries of the Company.
- 23. Plans for achieving goals are formed in accordance with the Company's internal document Rules for the development and monitoring of the implementation of an action plan in the field of health and safety in NC KTZ JSC and its subsidiaries.
- 24. Planning of activities should be aimed at covering all goals and achieving them in the shortest possible time.

When planning health and safety activities, the priority of the formation and distribution of resources should be taken into account, incl. financial, taking into account the hierarchy of risks.

Priority allocation of resources for financing is subject to activities aimed at eliminating and reducing critical risks.

- 25. It is prohibited to exclude from budgets and action plans and/or postpone to a later date the implementation of projects aimed at ensuring occupational safety and health, except in cases where their irrelevance is objectively proven due to the introduction of new equipment or technology.
- 26. Budget formation is carried out in accordance with the Rules for the development, coordination, approval, adjustment, execution and monitoring of the implementation of development plans for subsidiaries of the Samruk-Kazyna JSC approved by the act of the Samruk-Kazyna JSC, and the Rules for the development, coordination, approval, monitoring of execution, adjustment of development plans and budgets of subsidiaries of the National Company Kazakhstan Temir Zholy JSC approved by the decision of the Board of NC KTZ JSC.

10. Competence, training, and awareness

- 28. In order to ensure the competence of the personnel of the structural division and subsidiary of the Company, upon hiring/transfer to work, the need for the necessary competencies of the employee is identified with subsequent training related to risk management and legal requirements. The necessary competence of personnel is determined in accordance with the regulatory act approved by the authorized body. List of positions (professions) of railway transport workers and qualification requirements for them.
- 29. Structural divisions and subsidiaries of the Company provide professional training, retraining, advanced training of employees and monitoring of professional development and training, including the effectiveness of training in accordance with the Company's internal document Rules for organizing professional

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development and training.

- 30. Personnel qualifications are also ensured through seminars, trainings, internships, scientific and practical conferences, exhibitions, forums, and skills competition.
- 31. Training and testing of knowledge of workers on safety and labor protection issues are carried out in accordance with the Rules and terms of training, instruction and testing of knowledge on safety and labor protection issues of workers, approved by a separate internal document of the Company.
- 32. In order to comply with labor safety requirements, technical training is carried out in structural divisions and subsidiaries of the Company in accordance with the standard Organization and conduct of on-the-job training for employees of NC KTZ JSC and its subsidiaries approved by a separate internal document of the Company.
- 33. Professional training, retraining of specialists, workers of hazardous production facilities on industrial safety issues is carried out in accordance with the Law of the Republic of Kazakhstan "On Civil Protection".
- 34. The preparation and procedure for testing knowledge on electrical safety issues is carried out in accordance with the Rules for internal monitoring of the state of electrical safety and technically sound maintenance of electrical installations in the Company and its subsidiaries approved by a separate internal document of the Company.
- 35. Qualification testing of knowledge, managers and specialists of structural divisions and subsidiaries of the Company engaged in the transmission and distribution of electrical energy is carried out in accordance with the regulatory legal act of the Republic of Kazakhstan, Rules for conducting qualification tests of knowledge of technical operation rules and safety rules of managers, specialists of organizations engaged in production, transmission and distribution of electrical and thermal energy and their testing for the purpose of energy supply, to monitor the technical condition and safety of operation of electrical and power installations.
- 36. For employees of the Company and subsidiaries, as well as third parties who are allowed to work at the facilities of the Company and subsidiaries, briefings are carried out in accordance with the Rules and terms of training, instruction and knowledge testing on the issues of safety and labor protection of workers, approved by the internal document of the Company.

Personnel awareness is achieved through production councils on occupational safety and health, the corporate website and information portal of the Company, the use of a mobile and/or computer version of ISPS, production corners on health and safety, feedback opportunities, and holding production meetings.

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11. Motivation

37. Motivation of personnel in the field of health and safety serves as a tool for developing a safety culture in the Company and is regulated by the internal documents of the Company Rules for moral incentives in the National Company Kazakhstan Temir Zholy JSC, Rules for remuneration and bonuses in the National Company Kazakhstan Temir Zholy JSC, as well as internal documents of the subsidiary.

The Company has a practice of issuing certificates of trust to structural divisions and subsidiaries that have not recorded occupational accidents for a long time. The Company holds Olympiads on health and safety issues, based on the results of which the most distinguished employees are awarded.

38. Each structural division and subsidiary regularly recognizes and publicly rewards its employees who use proactive tools for the best results in occupational safety. According to the Rules of Moral Incentive in the National Company Kazakhstan Temir Zholy JSC, approved by an internal document, the Company and its subsidiaries monthly determine through ISPB and financially reward employees who have completed the most significant BSD with a description of violations that pose a threat to the lives of workers and/or are systemic character.

12. Communication

- 40. Communications in the Company exchange information by:
- communicating the position and expectations of management on health and safety issues;
 - warning about existing dangers and risks;
 - exchange of best experience in the field of health and safety;
 - clarification of health and safety requirements to employees;
 - involving employees in improvement work in the field of health and safety.
- 41. The Company maintains an open dialogue on health and safety issues with all interested parties, ensures transparency, openness and reliability of information about the Company's activities in the field of health and safety.
- 42. The Company has established vertical and horizontal corporate communications aimed at openly informing employees on health and safety issues. Vertical exchange of information makes it possible to bring goals and objectives to the attention of employees and provides the opportunity for employees to make proposals for improving the health and safety management system, and to bring to the

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attention of management their opinion on working conditions. Horizontal exchange of information is aimed at coordinating the interaction of employees of structural divisions and subsidiaries of the Company in the field of health and safety.

- 43. The list of issues and timing of both internal and external communications are stipulated by the Company's acts given in Section 14 of these Guidelines.
- 44. Internal and external communications are carried out through the following communications: printed publications on paper and electronic media (bulletins and incident reports, news (information) bulletins on industrial safety, safety minutes), training sessions and videos, publications in industry publications and the media, information stands and corners), correspondence, direct and telephone contacts, meetings and meetings for collective discussion of accidents and morbidity among workers, as well as ways to prevent them, anonymous questioning in ISPB in order to assess the state of physical and mental health of personnel and the effectiveness of ongoing health measures, Round table with business partners (contractors).
- 45. Feedback on health and safety issues can be provided both through the specified channels and through the helplines listed on the Company's website, and in other ways that do not contradict the legislation of the Republic of Kazakhstan.
- 46. Separate information materials and documents on health and safety issues are posted on the Company's corporate information portal (CIP) and are updated as they are updated.

13. Documented information

- 47. Documentation of the health and safety management system of the Company and its subsidiaries includes the Corporate standard for industrial safety management for the Samruk-Kazyna JSC Fund Group, the Policy in the field of labor protection and industrial safety of Samruk-Kazyna JSC, the Policy of NC KTZ JSC Corporate Ideology and Business Philosophy, Guidelines for Managing the NC KTZ JSC Group of Companies, these Guidelines, rules, instructions and methods, regulatory and technical documentation and other local acts of the Company, subsidiaries, documents of collegial bodies, including working groups, aimed at meeting the requirements of regulatory legal acts of Kazakhstan in the field of occupational safety.
- 48. Methods for managing documentation and records of the health and safety management system are defined in the internal documents of the Company Rules for Document Management in NC KTZ JSC and Documentation Rules in NC

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14. Operations management

- 49. The Company and its subsidiaries have established procedures and defined criteria for the implementation and management of operations in the field of health and safety, the absence of which could lead to a deviation from the Company Policy, goals and objectives.
- 50. The operations management process is implemented by a set of measures to determine goals, establish requirements for achieving them, analyze performance and implement control actions to achieve the target level of safety and improve it.
- 51. Procedures for managing operations and risks are regulated and implemented in accordance with the regulatory legal acts of the Republic of Kazakhstan, local acts of the Company, subsidiaries in the field of health and safety.
- 52. Operations management procedures are recorded in such management system documents as:
 - register of hazards and risks;
 - rules and instructions on labor protection;
- procedure and regulations for performing certain types of work (technological maps, technological processes);
- work permit (use of a system of work permits to perform hazardous types of work).
- 53. In order to change the behavior of an employee during the performance of a production task and eliminate dangerous actions and conditions that can lead to injuries, each division of the Company and its subsidiaries conducts safety and security assessments in accordance with the Rules for organizing a behavioral safety dialogue in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, approved by the local act of the Company.
- 54. In order to comply with the purchased goods, works and services with the safety requirements specified in the contracts, the Company applies the Company's internal document Rules for managing the procurement activities of the National Company Kazakhstan Temir Zholy JSC and organizations with fifty or more percent of voting shares (participatory interests) which directly or indirectly belong to NC KTZ JSC under the right of ownership or trust management.
- 55. The health and safety management system includes a methodology for the classification of incidents, reporting, investigation and detailed analysis of incidents in the form of violations, potentially dangerous incidents without any

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consequences (Near Miss), technological incidents, accidents in accordance with the Incident Management standard with the determination of their root causes in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, approved by the internal document of the Company.

- 56. Control and monitoring of the physical and mental health of personnel is carried out in accordance with the Labor Code of the Republic of Kazakhstan, regulatory legal acts of the state authorized body in the field of healthcare and collective agreements of the Company and subsidiaries.
- 57. Risk management in the field of health and safety is carried out in accordance with the standard Identification of hazards and environmental aspects, their assessment and risk management in the field of health and safety in NC KTZ JSC and its subsidiaries, approved by the internal document of the Company.
- 58. To minimize the emergence of new hazards and risks in the field of health and safety, hazards are identified, assessed and subsequently managed. Labor safety management when performing work for the Company and subsidiaries by contractors is carried out in accordance with the standard of safety management when performing work by contractors in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, approved by the internal document of the Company.
- 59. Uniform requirements for carrying out work in conditions of increased danger and the registration and application of work permits when carrying out work in conditions of increased danger in the Company and subsidiaries are established in accordance with the Rules for the registration and application of work permits when carrying out work in conditions of increased danger, approved by the state authorized body, and the standard Organization of work in conditions of increased danger with the issuance of work permits in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, approved by the internal document of the Company.
- 60. Responsibility for monitoring the implementation of the prescribed risk management measures in the workplace, for maintaining workplaces in a safe condition, the physical and mental health of personnel at the workplace is assigned to the heads of structural divisions of the Company and its subsidiaries.

15. Emergency preparedness and response

61. The unified procedure for preparedness and response to emerging emergencies is carried out in accordance with the requirements of the regulatory legal acts of the Republic of Kazakhstan in the field of civil protection and the standard of the organization Prevention and liquidation of emergency situations in the National Company Kazakhstan Temir Zholy JSC and in its subsidiaries, approved a separate

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local act of the Company.

- 62. Emergency preparedness and response procedures include:
- 1) planning activities to identify, prevent and eliminate the consequences of emergency situations;
- 2) training of all personnel at all levels of management on actions in cases of emergency situations (schedules for conducting drills and training sessions, creating a headquarters for eliminating the consequences of emergency situations);
 - 3) provision of adequate means to eliminate emergency situations;
- 4) informing at all levels of management and establishing communication with the relevant competent authorities, the population and emergency services.
- 5) periodic assessments of the compliance of the emergency prevention and response system with established requirements.
- 6) organization and functioning of the operational headquarters for eliminating the consequences of emergencies.

16. Internal control

- 63. Internal control over health and safety is carried out in order to comply with established requirements for safety and labor protection in the workplace and take effective measures to eliminate detected violations.
- 64. Internal control in the structural divisions of the Company and its subsidiaries is carried out in accordance with the standard of the organization Organization of internal control of activities in the field of industrial safety in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, as well as the internal document of the Company Rules for planning and implementation internal audit in the group of companies NC KTZ JSC.

17. Evaluation of conformity of activities

17.1. Monitoring, measurement, analysis, and evaluation

65. The objectives of the monitoring process are:

implementation of activities, programs and plans in the field of health and safety;

accident prevention;

ensuring the safety of production processes at hazardous production facilities; timely identification of hazards and associated risks;

elimination and minimization of identified hazards and risks.

66. To monitor, analyze and assess the state of health and safety at all levels

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of management of the Company and subsidiaries, records and collection of information are carried out, summarizing information and submitting reports to the management of the Company and subsidiaries.

- 67. Reporting is an internal monitoring tool and the basis for subsequent analysis and assessment of the performance of the health and safety management system.
- 68. The basic principles of health and safety monitoring are implemented by ensuring compliance with the requirements of the legal regulations of the Republic of Kazakhstan, local acts of the Company, subsidiaries, implementation of measures in the field of health and safety aimed at reducing harm to human health, the production process and the facility.
- 69. Registration of cases of violations in the field of health and safety and safety and reports on them are provided in the forms established by the regulatory legal acts of the Republic of Kazakhstan, the organization's standard on incident management and determination of their root causes in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries, approved by the Company's internal document.
- 70. Within the established time frame, divisions of the regional, linear levels of the Company and its subsidiaries provide reports in the established form to the territorial divisions of the authorized government body, the management of the regional and network management levels, as well as to the management level of the Company group in accordance with the Rules for the development and monitoring of the implementation of the action plan in the field of industrial safety at NC KTZ JSC and its subsidiaries, approved by the Company's internal document.
- 71. Reporting on the effectiveness of the health and safety management system is heard:
- 1) at the management level of the Company group on the Board of Directors of the Company at intervals established by the Sole Shareholder.
 - 2) at the network control level:

monthly - according to a separate schedule at a meeting with the heads of the network division of the Company and its subsidiaries or using mass media;

quarterly - at meetings to hear reports from process owners from the Company's management or using mass media;

according to separate schedules - with the Chairman of the Board of the Company.

3) for regional and linear management levels, the frequency and reporting procedure are established by the owners of processes at a higher management level.

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The results of the hearings are drawn up in the form of protocols signed by the person who accepted the report, after agreement with the managers supervising the organizations of the Company group.

72. Reports are input data for analyzing the activities of the Company and subsidiaries in the field of health and safety.

17.2. Conformity assessment

73. The Company and its subsidiaries evaluate their activities for compliance with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of health and safety. Every year, at all levels of management of the Company and its subsidiaries, compliance with the requirements of regulatory legal acts of the Republic of Kazakhstan and local acts of the Company is assessed in accordance with the Methodology for assessing the compliance of the activities of NC KTZ JSC and its subsidiaries with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety.

The results of the assessment of compliance with the requirements of regulatory legal acts of the Republic of Kazakhstan and internal documents of the Company in the field of health and safety are input data for analyzing the state of health and safety by the management of the Company and its subsidiaries.

75. The Company annually conducts an external audit to confirm compliance of the occupational health and safety management system with the requirements of the international standard in the field of health and safety 45001:2018.

18. Performance analysis

- 76. Analysis of the state of health and maintenance is reviewed once a quarter at all levels of management of the Company and its subsidiaries.
- 77. The main input data for analyzing the functioning of the health and safety management system are:
 - 1) status of actions based on the results of the previous analysis;
 - 2) changes in internal and external issues related to health and safety;
 - 3) results of internal and external control;
- 4) results of assessment of compliance with legal and other applicable requirements;
 - 5) needs and expectations of stakeholders;

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- 6) analysis of the implementation of target and planned indicators in the field of safety;
 - 7) internal reporting;
- 8) information on incidents, nonconformities and corrective actions and continuous improvement activities;
 - 9) risks and opportunities;
- 10) consultations with workers and their participation in the management of health and safety;
- 11) resource support for the functioning of the health and safety management system;
 - 12) reports on corrective and preventive measures,
- 13) external circumstances, including legislative requirements and other requirements applicable to the activities carried out;
 - 14) information from external stakeholders, including complaints;
 - 15) information about opportunities for improvement.
- 78. The results of the analysis of the state of health and safety equipment serve as the basis for continuous improvement and include:
- 1) a conclusion regarding the continued suitability, adequacy and effectiveness of the health and safety management system in achieving the intended results;
 - 2) confirmation of the possibility of continuous improvement;
 - 3) identified needs for changes in the health and safety management system;
 - 4) allocation of resources;
- 5) decisions on the degree of integration of the health and safety management system with other business processes;
 - 6) proposals regarding the strategic direction of the Company's development;
 - 7) drawing up an action plan for health and safety measures.
- 79. Senior management analyzes the health and safety management system on an annual basis at meetings with the Chairman of the Board of the Company dedicated to summing up the results of the activities of the group of companies for the past year, in accordance with the requirements of the Company's internal document Guidelines for managing the National Company Kazakhstan Temir Zholy JSC group of companies.
- 80. Top management carries out an analysis of the health and safety management system in order to:
- 1) assessing the relevance, application and effectiveness of the management system and determining the necessary corrective and preventive actions to improve it (improvement);
 - 2) assessing the needs for changes in the health and safety management system,

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policies and strategic goals of the Company.

The Company uses a systematic approach to analyzing its activities in the field of health and safety on a regular basis.

As part of management's analysis of the health and safety status, the following is considered:

- 1) level of safety culture;
- 2) information on the results of the implementation of commitments reflected in policies, programs and plans to achieve goals and solve problems, for the purpose of improvement;
 - 3) levels of exposure to harmful factors;
 - 4) accidents and incidents of higher education;
- 5) information on the implementation of key performance indicators (KPIs) of the organization in the field of health and safety (section 4 of these Guidelines);
- 6) analysis of the sufficiency of resources (financial, labor, material and technical resources, etc.) to fulfill the stated obligations in the field of health and safety;
 - 7) analysis of the use of proactive accident tools;
 - 8) interaction with contractors;
 - 9) execution of previously issued instructions;
- 10) the results of consideration of complaints and appeals from public organizations, the population and other interested parties regarding issues of providing health care and safety.

The results of the analysis of the Company's senior management in the field of health and safety are annually published in the Integrated Report of NC KTZ JSC for the past year and submitted for approval to the Board of Directors of the Company.

19. Continuous improvement

- 81. Improving the health and safety management system is a constant work through control actions, including corrections and corrective actions, the results of which are expressed in increasing the level of labor safety.
- 82. The Company conducts a systematic assessment of the effectiveness of health and safety processes, searching for areas of possible improvement, in order to develop and implement corrective measures in these areas.
- 83. Decisions to revise the organization of the health and safety management system are made by the Company's Management based on the results of an analysis of its functioning. The result of improving the management system may be the adjustment of its elements (goals, objectives, structure, distribution of powers and

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responsibilities, allocated resources, procedures, etc.).

84. An assessment of the effectiveness of the health and safety management system is carried out by the Safety and Environmental Protection Committee of the Board of Directors of the Company for a preliminary and comprehensive study of issues and preparation of recommendations for a decision by the Board of Directors of the Company.
