



Appendix 6 to
decision of the Management Board
National company Kazakhstan temir
zholy joint – stock company
Protocol
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**Environmental Management System Manual
National company Kazakhstan temir zholy joint – stock company
and its subsidiaries.**

Revision 3.0

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1. General provisions.

The Guidance on the environmental management system in the National Company Kazakhstan Temir Zholy Joint Stock Company and its subsidiaries (hereinafter referred to as the Guidance) has been developed in accordance with the requirements of the legislation of the Republic of Kazakhstan and the international

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standard ISO14001:2015 "Environmental Management Systems". The Manual is the main document on the environmental management system of the joint-stock company "National Company Kazakhstan Temir Zholy" and its subsidiaries.

2. Terms, definitions and abbreviations.

The following terms and abbreviations are used in this Manual:

environment	- the environment in which an organization operates, including air, water, land, natural resources, flora, fauna, people and their relationships;
organization	- a person or group of people who have their own functional responsibilities with responsibilities, powers, and relationships to achieve their goals
environmental protection	a system of state and public measures aimed at preserving and restoring the environment, preventing the negative impact of economic and other activities on the environment and eliminating its consequences;
ecosystem	being an objectively existing part of the natural environment, a dynamic complex of communities of plants, animals and other organisms, their inanimate habitat, interacting as a single functional whole and interconnected by the exchange of matter and energy, which has spatial and territorial boundaries.
biological diversity/biodiversity	Variability (the ability to exist in different variants) of living organisms from all sources, including terrestrial, marine, and other aquatic ecosystems and the ecological complexes of which they are part, and includes diversity within species, between species, and ecosystem diversity;
sustainable development	socio-economic development achieved without violating environmental

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environmental monitoring

sustainability, while ensuring environmental safety and the environmentally balanced use of natural resources in order to meet the needs of present and future generations fairly; systematic monitoring and assessment of the state of the environment and its impact;

environmental risk

the probability of adverse changes in the state of the environment and (or) natural objects due to the influence of certain factors;

the environmental aspect

an element formed in the course of an organization's activities, the production of its products or the provision of services that interacts with the environment;

audit

a systematically conducted independent and documented process for obtaining audit evidence and evaluating it objectively in order to establish (determine) the degree of compliance with audit criteria;

JSC «NC «KTZ», Company

National company Kazakhstan temir zholy joint – stock company;

Subsidiary organization

legal entities, 100% of shares (participation interests) of which belong to JSC NC KTZ by right of ownership or trust management;

internal control

inspection, an audit carried out by the responsible structural unit of the Company and a subsidiary organization in the field of environmental protection;

pollution prevention

The use of processes, practices, methods, materials, products, services, or energy to eliminate, reduce, or manage the creation, release, or discharge of any pollution or waste in order to reduce negative environmental impacts;

Senior management

Chairman of the Management Board and members of the Management Board JSC

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Industrial Safety Service

«NC «KTZ»;

structural divisions and/or divisions within structural divisions and/or employees of divisions at all levels of management of the Company and subsidiaries engaged in activities in the field of industrial safety;

network level division

Company Division/A subsidiary that is directly subordinate to the Company's management/A subsidiary, in accordance with the local act of the Company/Subsidiary Organization;

regional level division

Company Division/A subsidiary whose activities are coordinated by a network-level division in accordance with the regulations on the network-level division; Company Division/A subsidiary Organization that is under the operational control of a regional-level subdivision in accordance with the internal documents of the regional-level subdivision;

owners of the process

a manager at least at the level of director of a Company's branch or head of a subsidiary, who manages the process within his authority, has at his disposal all the necessary resources to carry out the process (personnel, equipment, tools, production environment, information, powers and competencies, etc.), and is responsible for the effectiveness and efficiency of the process

The SMART principle

the principle of goal setting, which allows you to set acceptable work deadlines, determine the adequacy of resources, and provide all participants in the process with clear, precise, and specific tasks.

structural divisions/SD

departments, services, branches, assigned staff, representative offices of JSC NC KTZ, including those located outside the Republic of Kazakhstan;

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group of companies SC «NC JSC NC KTZ and its subsidiaries;
«KTZ»

Inspection

Occupational Safety and Environmental
Inspectorate of the branch of JSC NC
KTZ – «Multifunctional Service Center».

Other concepts are used in the meanings defined by the regulatory legal acts of the Republic of Kazakhstan, internal documents of the Company.

3. Environmental Protection Policy

The Company's environmental protection policy is reflected in the document Policy on the Management System of the KTZ NC Group of Companies, approved by a separate local act of the Company, which corresponds to the Company's goals, provides a basis for defining environmental objectives, and also includes the Company's obligations to meet environmental protection requirements and prevention of environmental pollution.

The Company and its subsidiaries must improve their environmental management system and are making every effort to reduce the negative impact on the environment and humans, including greenhouse gas emissions, the use of asbestos-containing materials in their activities, and is taking all necessary measures to preserve biodiversity and ecosystems, as well as measures to form and develop a corporate environmental culture.

The Company and its subsidiaries use a systematic approach at all levels of management through continuously improved policies, processes, goals, and initiatives.

3.1 Obligations of the Company and its Subsidiary in the field of environmental protection

In the course of their activities, the Company and its Subsidiary assume the following obligations:

- 1) compliance with the requirements of the legislation of the Republic of Kazakhstan and other requirements applicable to the activities of the Company and its Subsidiary in the field of environmental protection, including the norms of international law and the requirements of the international standard ISO 14001;
- 2) continuous improvement of the environmental management system;
- 3) when implementing the planned activity, carry out an environmental impact assessment, ensuring a mandatory assessment of the risks of the impact of the activity on the biodiversity of flora and fauna. The assessment covers the Company's own operations and the Subsidiary, as well as adjacent territories and areas directly or indirectly affected by these operations.;
- 4) conservation of the environment and biological diversity, the introduction of tools for the efficient use of natural resources and electric energy;

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5) Minimizing potential direct, secondary and cumulative impacts on biodiversity;

6) when carrying out activities, avoid negative effects on the state of wildlife, habitat, breeding conditions and migration routes of animals, in compliance with environmental requirements that ensure the safety of wildlife and its habitat.

7) maximum application of preventive measures aimed at preventing the occurrence of risky environmental events;

8) reducing the negative impact on the environment by ensuring internal control and prevention of pollution by emissions, discharges, rational use of natural resources and proper disposal of waste activities;

9) developing a caring and respectful attitude towards the environment, strengthening the responsibility of each employee for environmental protection and ensuring appropriate approaches to work and employee training;

10) protection of water resources from all types of pollution, including diffuse pollution (pollution through the earth's surface, soil, subsoil or atmospheric air);

11) taking mandatory measures to reduce water consumption and reuse through wastewater treatment;

12) conducting continuous monitoring of the use of water resources, the quality of wastewater and natural waters;

13) management of emissions of pollutants into the environment by ensuring industrial environmental control of emissions, discharges and waste;

14) interaction and exchange of experience with stakeholders and other business entities on environmental protection and biodiversity issues in order to improve environmental performance;

15) openness and reliability of the reporting of the Company and its Subsidiary in the field of environmental protection;

16) raising awareness among the public and other stakeholders about the impact of the Company's environmental aspects on the environment, ensuring public participation in decision-making;

17) implementation of measures to minimize local pollution (noise, continuous lighting, aesthetics of the landscape, vibrations);

18) Achieving a net positive impact on biodiversity;

19) setting an annual target for achieving zero impact on biodiversity;

20) setting targets for priority areas aimed at preventing net loss of biodiversity;

21) avoid conducting operational activities near sites of global or national importance for biodiversity (from the value chain);

22) Application of a hierarchy of mitigation measures for impacts on biodiversity;

23) Public reporting on the stages of the biodiversity risk assessment process;

24) The use of internationally recognized methodologies and frameworks in conducting risk assessments of biodiversity;

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25) integration of biodiversity risk management into multidisciplinary corporate risk management processes;

26) taking into account the risks associated with the impact on biodiversity in the overall risk assessment of the Company's activities;

4 Environmental safety in structural divisions and Subsidiary Organization

The work on ensuring environmental safety in the structural divisions and the Subsidiary Organization is based on a set of organizational, technical, methodological, production and other measures.

The main objectives of the organization of work to ensure environmental safety are:

- 1) reducing the negative impact of rail transport on the environment;
- 2) rational use of natural resources;
- 3) conservation of biodiversity;
- 4) restoration of disturbed natural ecological systems;
- 5) reduction of water consumption;
- 6) Efficient and transparent management of water use;
- 7) compliance with environmental regulations;
- 8) Prevention of environmental damage.

The activities of the structural divisions and the Subsidiary in the field of environmental protection, industrial environmental control and environmental safety are regulated by the Environmental Code of the Republic of Kazakhstan, these Guidelines and other internal documents of the Company and the Subsidiary

The organization of work on environmental protection, compliance with the requirements of the Environmental Code of the Republic of Kazakhstan and responsibility for ensuring environmental safety requirements are assigned to the first heads of the Company's structural divisions and the Subsidiary.

Employees of the NC KTZ JSC group of companies who are guilty of violating environmental legislation are liable in accordance with the legislation of the Republic of Kazakhstan.

4.1 Requirements in the field of atmospheric air protection

Atmospheric air protection in the structural divisions and the Subsidiary is carried out in accordance with the Environmental Code of the Republic of Kazakhstan, these Guidelines, as well as relevant internal documents of the Company and the Subsidiary.

Structural divisions and subsidiaries, carrying out the technological process related to the release of pollutants into the atmospheric air, must have appropriate installations and equipment for cleaning emissions, ensuring the reduction of negative effects on atmospheric air.

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The number and list of pollutants released into the atmosphere by stationary sources of the structural unit is regulated by a permit for emissions of pollutants into the atmosphere. No emission standards are set for mobile sources.

4.2 Requirements in the field of water resources protection

The protection of water resources by structural divisions and a Subsidiary Organization must be carried out in accordance with the procedure established by the water legislation of the Republic of Kazakhstan.

Structural Divisions and a Subsidiary Organization are required to comply with the rules of general water use established by local representative bodies of regions, cities of republican significance, and the capital.

Construction, reconstruction (expansion, modernization, technical re-equipment, redevelopment), operation, conservation, and liquidation of facilities affecting the condition of water bodies are carried out in the presence of a positive conclusion from the authorized state body in the field of environmental protection, the authorized body for the study of mineral resources, the state body in the field of sanitary and epidemiological welfare of the population and the authorized body in the field of civil protection.

Polluted waters discharged from production facilities, administrative and domestic buildings and structures, as well as polluted stormwater runoff from the facilities of the Company and its Subsidiary should not be discharged into surface water bodies, onto the surface of soil and soil without their purification to the maximum permissible concentrations established by the Environmental Code of the Republic of Kazakhstan.

When operating production, household and other facilities, in order to prevent contamination of surface reservoirs, groundwater and groundwater, it is prohibited:

- discharge wastewater into water bodies that have not undergone sanitary treatment and/or neutralization, as well as wastewater that does not meet the requirements of technical regulations;
- to take (withdraw) water resources from a water body in an amount that has a negative impact on the water body;
- discharge wastewater into water bodies containing pathogens of infectious diseases, as well as harmful substances for which standards of maximum permissible concentrations are not established.

Structural divisions and Subsidiaries that discharge wastewater must use water volume meters and keep logs of water consumption and sanitation in accordance with the water legislation of the Republic of Kazakhstan.

Structural Divisions and Subsidiaries, in order to rationalize the use of water resources, should, as far as possible and appropriate, develop and implement measures for the reuse of water and recycled water supply.

In order to ensure effective management of water resources, it is envisaged:

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- consolidation of managerial authority and responsibility for water use issues; responsibility for the effectiveness of water use at each management level is assigned to the heads of structural divisions and subsidiaries;

- conducting a regular assessment of water use in order to identify the potential for improving the efficiency of water resources use in accordance with the requirements of the water legislation of the Republic of Kazakhstan;

- implementation of measures aimed at reducing water consumption;

- implementation of measures to improve the quality of wastewater in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan;

- setting goals and indicators for reducing water use on an annual basis at each management level;

- implementation of technological solutions, including water recycling (recycled water supply) systems;

- organization of training of employees on programs of rational water use and improvement of efficiency of water resources management in accordance with the internal documents of the Company.

4.3 Requirements in the field of land resources protection and waste management

The protection of land resources is carried out in accordance with the land legislation of the Republic of Kazakhstan.

One of the measures to protect land resources is to prevent the cluttering of land with production and consumption waste.

Structural divisions and Subsidiaries that generate waste are responsible for their safe handling until the waste is transferred for recycling or disposal to specialized third-party organizations.

The limits of waste accumulation and disposal for structural divisions and Subsidiaries of waste accumulation sites that are part of category I and II facilities are established on the basis of an appropriate environmental permit.

Limits of accumulation and disposal of waste are established for each specific place of accumulation of waste, which is part of objects of I and II categories, in the form of a maximum quantity (mass) waste according to their types, allowed for storage in the appropriate place of accumulation, within the time period established in accordance with the Environmental Code of the Republic of Kazakhstan.

Limits on the accumulation and disposal of waste are not set for objects of categories III and IV.

It is prohibited to accumulate waste beyond the time limits specified in paragraph 2 of Article 320 of the Environmental Code of the Republic of Kazakhstan, and (or) exceeding the established limits of waste accumulation (for objects of

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categories I and II) or waste accumulation volumes specified in the environmental impact declaration (for objects of category III).

Passports of hazardous waste, which reflect the production and consumption of waste to be collected, neutralized, transported, stored and disposed of, conditions and methods should be sent to the authorized body in the field of environmental protection.

The general procedure for the management of production and consumption waste is regulated in the Waste Management Rules of JSC NC KTZ and its subsidiaries, approved by a separate local act of the Company, and the detailed procedure is specified in the passport of hazardous waste.

In order to improve the efficiency of the waste management system, the Company implements the following areas:

- during the audit, waste management issues are considered to identify opportunities for improving waste disposal and recycling rates;
- development and implementation of action plans to reduce waste generation;
- setting quantitative waste minimization goals in accordance with section 8 of these Guidelines and monitoring their achievement annually;
- making investments in innovation and R&D aimed at minimizing waste and developing recycling technologies;
- organization of staff training on waste reduction and implementation of best practices for waste management;
- integration of waste recycling programs into the Company's production and management processes in order to reduce the volume of waste sent to landfills;
- waste transfer by specialized organizations that have the appropriate permits in accordance with the requirements of environmental legislation.

4.4 Requirements of the Company and its subsidiaries for the conservation of biodiversity

Protecting biodiversity is one of the Company's key objectives. Attention is paid to this area at every stage of the implementation of activities: from planning and construction to the operation of railway facilities.

The structural divisions and the Subsidiary prioritize the planning of the planned activity.:

- avoidance of operating activities near natural objects of world or national importance for biodiversity;
- application of a hierarchy of mitigation measures (prevention → minimization → restoration → compensation);
- integration of biodiversity conservation measures into corporate environmental and social management processes.

In cases where the planned activity may have an impact on specially protected natural territories, the environmental impact assessment process also includes an

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impact assessment on the relevant natural complexes, including lands of specially protected natural territories, as well as objects of the state nature reserve fund located on these lands and lands of other categories.

Environmental impact assessment is mandatory for all types of activities that may have an impact on the environment and human health.

5 The environmental foundations of sustainable development and reducing the Company's carbon footprint

The ecological foundations of sustainable development are:

1) formation and maintenance of sustainable production and consumption patterns, minimization of anthropogenic impact (direct or indirect impact of human activities on the environment) on the environment, reduction of consumption of non-renewable natural resources, reduction of waste generation and disposal, as well as stimulation of their use as secondary resources;

2) implementation of measures to preserve the sustainable functioning of natural ecological systems, preserve biological diversity and prevent environmental degradation;

3) the Company's participation in the global response to the threat of climate change by implementing measures to protect the ozone layer of the earth's atmosphere;

The Company's carbon footprint includes direct and indirect emissions.

Direct emissions (**Scope 1**) of greenhouse gases are carried out during the operation of mobile sources (diesel locomotives, trolleys, cars) and stationary consumers (boilers, boiler rooms, furnaces). For example, emissions from combustion in boilers, furnaces, vehicles, etc.;

Indirect emissions (**Scope 2**) greenhouse gas emissions from fuel combustion from third-party energy sources for electricity generation purchased by the Company.

Indirect emissions (**Scope 3**) are greenhouse gas emissions that occur not at the Company's own facilities, but along the entire value chain as a result of the activities of contractors, suppliers and consumers. These include, for example, emissions from the production and transportation of purchased materials and services, business trips, waste disposal, the use of products sold, and other activities beyond the direct control of the Company.

The Company's strategic goals and objectives to reduce its carbon footprint are being implemented in accordance with the Low-carbon Development Concept of Samruk-Kazyna JSC and the Low-carbon Development Concept of the National Company Kazakhstan Temir Zholy Joint Stock Company and its subsidiaries until 2060.

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According to the Concept of Low-carbon development of Samruk-Kazyna Joint Stock Company for the transport sector, measures to reduce the carbon footprint will be implemented in two main areas:

- 1) switching to more environmentally friendly modes of transport;
- 2) Improving energy efficiency and reducing emissions from vehicles by switching to alternative energy sources.

6 Obligations to comply with legal requirements

As part of the implementation, maintenance and continuous improvement of the environmental management system in the Company and its Subsidiary, the requirements of regulatory technical documents, regulatory legal acts of the Republic of Kazakhstan and other obligations related to environmental aspects are taken into account.

The list of regulatory legal acts and regulatory technical documents in the field of ecology is drawn up in the form of a Register of legislative and other requirements in the field of environmental protection at all levels of management of the Company and its Subsidiary (hereinafter referred to as the Register).

Employees responsible for the organization of environmental protection work in the structural divisions and Subsidiaries and the Company's industrial safety service constantly monitor the requirements of internal and external documents in the field of environmental management. The main sources of information are: technical libraries, periodicals (magazines, newspapers on labor protection and ecology), Internet sites on relevant topics, information systems.

The Register is updated at least once a year or in cases of amendments and additions to the relevant documents, registration for loss and approval of a new version of the documents specified in the Register.

The procedure for assessing the compliance of the Company and its Subsidiary with the requirements of legislative, regulatory technical documents, state and international standards is carried out in accordance with the Methodology for assessing the compliance of JSC NC KTZ and its subsidiaries with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety, approved by a separate local act of the Company.

If necessary, the assessment of the quality management system for compliance with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of environmental protection can be carried out simultaneously with the internal audit of the integrated management system, as well as during internal control conducted in accordance with the requirements of the Internal Control Standard in JSC NC KTZ and its Subsidiary, approved by a separate local act of the Company.

7 Identification of environmental aspects, risk assessment

Identification of environmental aspects, their assessment and management of environmental risks are carried out in order to continuously improve the state of environmental safety, as well as to identify and prevent events that may have a negative impact on the environment. Ensuring a uniform procedure for identifying environmental aspects of their assessment and management of environmental risks in the Company and its subsidiaries is the basis for action planning at all levels of management.

The procedure for identifying environmental aspects, assessing risks and opportunities, and determining risk management measures in the Company is carried out in accordance with the requirements of the Standard for Hazard Identification, Environmental Aspects, Assessment and Risk Management in the field of Industrial Safety, approved by a separate local act of the Company.

The identification and assessment of biodiversity risks is carried out as part of the Environmental Impact Assessment of the planned activities.

Identification and assessment of biodiversity risks are carried out on an ongoing basis and cover all stages of the project life cycle, from the planning stage to implementation and subsequent operation.

The scope of the biodiversity risk assessment covers both the Company's own operations and related areas directly related to these operations. At the same time, the impact on:

- atmospheric air;
- Surface and groundwater;
- Land resources and soil cover;
- landscapes;
- biodiversity and other environmental factors.

The Structural Divisions and the Subsidiary, when approving environmental impact assessment projects and other relevant documents, ensure that compliance with the following requirements is monitored:

- in order to ensure transparency, comparability and correctness of the results, the Company uses applicable methodologies and frameworks, including recognized international and national standards, when conducting risk assessments.

- Modern tools are used to analyze the risks associated with the impact of projects on biodiversity, ensuring the choice of solutions that cause the least damage to the environment and public health.

- as part of this process, a location-based approach is used to take into account the local characteristics of ecosystems, the sensitivity of the territory and the specifics of natural conditions.

- environmental risk assessment, control and monitoring activities, including the risks of project impacts on biodiversity, are integrated into multidisciplinary

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corporate risk management processes, which ensures that environmental aspects are systematically taken into account when making management decisions and their alignment with operational, strategic and technical risks.

8 Formation of goals in the field of environmental management and their achievement

The Company's structural divisions and subsidiaries develop environmental management goals and plans to reduce environmental risks.

Environmental management goals are set based on identified environmental aspects, risks and opportunities and are based on the SMART principle.:

Specific: Concreteness (the goal must be clearly defined);

Measurable: measurability (the goal must be measurable);

Achievable or Attainable: achievability (the probability of achieving the goal must be high);

Relevant: significance (the goal should be to increase efficiency and improve performance);

Time bound: time limitation (a time limit for achieving the goal must be set).

The environmental management goals of the network-level division are coordinated with the corporate-level production security service and approved by the process owner of the network-level management division.

The environmental management goals of a network-level division are cascaded into regional-level divisions, and the environmental management goals of a regional-level division are cascaded into line-level divisions.

The environmental management objectives of a regional-level division are approved by the heads of the regional-level division in consultation with the network-level division.

The environmental management objectives of a line-level division are approved by the head of the line-level in consultation with the regional-level division.

The owners of the process are responsible for cascading and bringing environmental management goals to all levels of management.

The achievement of goals and the fulfillment of tasks in the field of environmental management is monitored and analyzed at least once a quarter by the management of the Company's divisions and Subsidiaries at all levels of management.

When analyzing the management, it is necessary to focus on:

- 1) Lead times;
- 2) quality of execution;
- 3) the course of execution;
- 4) sufficiency of financing.

9 Planning of environmental protection measures

Environmental protection plans are being developed in the departments of the network, regional and linear management levels to achieve environmental protection goals.

Environmental protection planning is inextricably linked to the overall planning cycle in the Company and takes into account:

1) requirements of regulatory legal acts of the Republic of Kazakhstan, international standards governing the activities of the Company and its Subsidiary in the field of environmental protection;

2) significant environmental aspects, risks and opportunities.

The priority of the formation and allocation of resources (financial) is based on the results of the assessment of aspects. First of all, activities aimed at reducing significant environmental aspects are subject to financing.

When planning events, measures are taken into account that require an immediate solution to the environmental problem for all previously identified violations. Financing of such events is mandatory for financial and economic services of Structural Divisions and Subsidiaries.

Projects aimed at eliminating critical violations in the field of environmental protection are not subject to exclusion from the budget of expenditures and action plans and/or postponement to a later date, except in cases where their relevance is objectively proven due to the introduction of new equipment, technologies, and the introduction of new production processes.

The environmental action plan is developed annually in accordance with annex 1 to this Guide.

Action plans for environmental protection activities of Structural Divisions and Subsidiaries are developed on a bottom-up basis, based on proposals from a lower-level division, followed by consolidation and approval at the network management level.

The environmental action plan includes the following sections:

1) Section 1. "Protection of atmospheric air";

This section reflects measures to reduce emissions provided for by the draft regulations for maximum permissible emissions of pollutants into the atmosphere, through the introduction of purification systems, modernization or elimination of sources of emissions, etc.;

2) Section 2. "Protection of water resources";

This section covers measures to prevent the negative impact of wastewater on the environment, land reclamation after the termination of storage facilities,

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commissioning (reconstruction) of wastewater treatment plants, the introduction of water recycling and reuse facilities, storm drains, the construction of oil traps, flotation plants (a device that separates a mixture of water and pollutants through the use of air flow rate), installation of drain trays with oil collectors provided for by the draft standards of maximum permissible discharges into the environment;

3) Section 3. "Protection of land resources";

This section covers measures for the storage and removal of industrial waste, cleaning the territory from petroleum products and other industrial waste, cutting off contaminated soil, equipping sites for storing scrap metal and other waste, recycling waste, preserving biodiversity on railway right-of-way lanes, in the area of stations and train stations, planting trees and shrubs.;

4) Section 4. "Conservation and protection of biodiversity";

This section covers measures to preserve and protect biodiversity during the construction (design) and operation of railway infrastructure facilities, including measures to prevent and reduce negative impacts on natural ecosystems, flora and fauna.

5) Section 5. "Development and adjustment of regulatory technical documentation";

This section reflects measures for the development (adjustment) of draft emission standards, environmental impact assessment, industrial environmental control programs, hazardous waste passports and other regulatory documents required in accordance with the environmental legislation of the Republic of Kazakhstan.;

6) Section 6. "Training of specialists involved in environmental protection activities, which reflects information on the need for training of employees involved in environmental protection activities."

The environmental action plan is submitted within the following time frame:

1) by divisions of the linear and regional levels – before September 1 of the year preceding the planned year - to divisions of the network level for a set of;

2) network–level divisions - by December 1 of the year preceding the planned year, submit for review and approval to the Inspectorate consolidated Plans of environmental protection activities, previously agreed upon by the financial and economic services of network-level divisions.

The environmental action plan is approved:

1) in the divisions of the linear and regional levels – the first heads of departments after coordination with the division of the network level;

2) in network–level divisions, the first head of the network-level division after approval from the Inspection.

The effectiveness of environmental protection measures is assessed by the industrial safety service by comparing the indicators in the field of industrial safety

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for the current reporting period with those for the same period last year.

Assessment of the effectiveness of environmental protection measures is the input information for conducting an analysis of the effectiveness of the unit's activities at the network, regional and linear levels.

Typical environmental protection measures are listed in appendix 2 to these Guidelines.

10 Implementation and operation

10.1 Resources, roles, responsibilities and powers

The top management ensures the availability of resources (human, technological, financial and others) necessary for the development, implementation, functioning and improvement of the environmental management system in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company, Subsidiaries. The Deputy Chairmen of the Management Board, Managing Directors/Chief Engineer, as well as the first heads of structural divisions and Subsidiaries are responsible for allocating resources.

The Deputy Chairmen of the Management Board, Managing Directors/Chief Engineer of the Company are responsible for the organization of environmental protection activities and requirements for compliance with environmental culture in the supervised structural divisions and Subsidiaries.

The overall management of measures to ensure, form and maintain the Company's environmental management system is carried out by the Company's senior management and the heads of the Company's structural divisions and a Subsidiary.

The heads of Structural Divisions and Subsidiaries are responsible for the proper organization of work, the implementation of planned activities, the fulfillment of instructions from authorized government agencies, and violations of environmental legislation.

Environmental activities in structural divisions and subsidiaries are conducted by employees whose job descriptions contain responsibilities for their environmental protection work, while in regional-level divisions, additional responsibilities (loads) related to other activities are not assigned to these employees.

10.2 Functions of the structural divisions of JSC NC KTZ and its Subsidiary Environmental Protection Organizations

The divisions of the network management level perform the following functions in relation to the supervised divisions of the regional and linear levels:

1) monitoring the state of the environment in order to determine the main directions for solving problems in the field of ecology and conducting a continuous systematic analysis of environmental protection activities;

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2) implementation of guidelines on environmental protection and rational use of natural resources;

3) implementation of control:

accounting for the consumption of natural resources;

monitoring the amount of emissions (discharges) of pollutants into the environment, reducing emissions of harmful substances through the use of purification systems and their improvement in order to increase the efficiency of purification;

for timely submission, in accordance with the established procedure, to the relevant territorial state authorized bodies of reports provided for by the legislation of the Republic of Kazakhstan on environmental protection;

for timely submission of reports to the Inspection in accordance with Appendices 3,4,5 to this Manual;

for the timely development and receipt of the necessary regulatory and licensing documents in the field of environmental protection;

monitoring the implementation of environmental protection measures, as well as the activities of managers and specialists responsible for organizing environmental protection activities;

for the elimination of violations identified as a result of state control and internal control in the field of environmental protection;

1) coordination of work:

- to create harmless industries;

- study and dissemination of best practices in the field of environmental protection;

- development and processing of regulatory and technical documents on environmental protection;

- to prepare proposals for the exchange of experience and international cooperation in the field of environmental protection;

- rational use of natural resources.

Regional and line-level divisions perform the following functions:

1) organization of work on accounting and analysis of the environmental condition of the enterprise;

2) planning of environmental protection measures;

3) timely development and submission of applications for obtaining the necessary regulatory and licensing documents in the field of environmental protection;

4) monitoring the implementation of organizational and technical measures aimed at reducing harmful emissions into the environment, including the functioning of existing and the introduction of special technical means (cleaning);

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5) participation in the creation/implementation of harmless industries, study and dissemination of best practices in environmental protection;

6) development of hazardous waste passports;

7) conducting an inventory of environmental pollution sources;

8) control over the amount of emissions (discharges) of pollutants into the environment, reducing emissions of harmful substances through the use of purification systems and their improvement in order to increase the efficiency of purification;

9) compliance with the instructions of state environmental inspectors and elimination of violations detected during internal control;

10) keeping records of information on the quantitative and qualitative characteristics of waste and methods of handling;

12) providing reports provided for by the legislation of the Republic of Kazakhstan on environmental protection to the relevant territorial state authorized bodies in accordance with the established procedure.

10.3 Competence, training and awareness

The Company and its Subsidiaries determine the necessary competence of personnel in accordance with the List of positions (professions) of railway transport workers and the qualification requirements for them, approved by the authorized body, as well as relevant qualification manuals and professional standards.

The Company has professional development processes for personnel responsible for environmental protection activities:

corporate training with the involvement of heads of structural divisions and experienced employees as trainers.;

specialized training (external training, if possible) is the training of employees responsible for environmental protection outside the Company in specialized organizations.

Mandatory training is the training of employees responsible for environmental protection on the topic of "Environmental safety" in the Company's training centers, at least once every 3 years.

In order to maintain the professional knowledge of railway transport workers, improve the efficiency and quality of work, labor productivity, and ensure environmental protection requirements, the Company and its Subsidiaries conduct technical training in accordance with the Standard of Technical Training at the National Company Kazakhstan Temir Zholy Joint Stock Company and its subsidiaries, approved by a separate act of the Company.

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As part of the commitment to raise awareness among stakeholders about the impact of the Company's environmental aspects on the environment, information about the Company's environmental protection is regularly posted on the website of JSC NC KTZ.

10.4 Communication

As part of the functioning of the environmental management system, the Company and its Subsidiaries communicate with stakeholders on environmental protection issues through conference calls, internal and government control, and personnel involvement in identifying environmental aspects, assessing risks and opportunities, and through communications.

Interaction with stakeholders on biodiversity issues is carried out within the framework of the environmental impact assessment procedure, as well as when conducting joint activities with government agencies and is based on the results of studies of potentially significant environmental impacts during the implementation of planned and operated activities. The participation of the interested public is ensured in accordance with the rules of public hearings.

Communications are carried out through correspondence, direct contacts, meetings, publications, electronic channels and mobile applications, telephone communications and other means of communication, both on paper and electronic media.

Feedback on environmental protection 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.

Individual information materials and documents on environmental protection issues are posted on the Company's Corporate Information Portal (KIP) and updated as they become more relevant.

The Company and its subsidiary must respond to complaints, claims of interested parties, appeals of individuals and legal entities on environmental protection issues and considers them in accordance with the procedure established by the legislation of the Republic of Kazakhstan and a separate internal document of the Company.

One of the ways to communicate information is through environmental corners in the Company's structural divisions and Subsidiaries at all levels of management.

11 Documented information

The documentation of the environmental management system of the Company and its Subsidiaries includes:

Policy in the field of the management system of the Group of companies of

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JSC NC KTZ;

Management Guide for the group of companies of JSC NC KTZ;

this Guide to the environmental management system in JSC NC KTZ and its subsidiaries;

regulatory, technical and organizational documentation, other internal documents aimed at meeting the requirements of regulatory legal acts of the Republic of Kazakhstan on the environment.

As part of document management, regional and line-level divisions should maintain a range of environmental safety cases. The mandatory list of documents in the nomenclature of environmental safety cases should include:

job descriptions of responsible environmental protection workers;

Environmental action plans;

environmental reports and analyses;

Draft standards for maximum permissible emissions;

Projects of maximum permissible discharges;

Waste standards placement program;

conclusions of the state environmental expertise;

Industrial environmental control program;

permits for emissions into the environment;

contracts for the provision of works and services related to environmental protection;

documents (acts, regulations, corrective action plans, reports on the elimination of inconsistencies, etc.) based on the results of environmental safety inspections;

correspondence with government agencies, departments of the Republic of Kazakhstan and third-party organizations on environmental issues;

correspondence with structural divisions and subsidiaries of JSC NC KTZ on environmental issues;

correspondence with individuals and legal entities on environmental issues;

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State statistical reports on ecology (2-TP air, 4OC), declaration;
inventory reports on non-hazardous and hazardous waste submitted to the authorized bodies in the field of environmental protection;
reports on Industrial environmental control submitted to the authorized bodies in the field of environmental protection;
reports on the implementation of special environmental management conditions submitted to the authorized bodies in the field of environmental protection;
list of hazardous waste, hazardous waste passports and related correspondence;
registers of environmental (including significant) aspects, risks, and corrective action plans to reduce hazards and risks;
journal of production and consumption waste accounting;
A log of appeals, complaints, and feedback from residents due to local pollution (noise, continuous lighting, landscape aesthetics, vibrations) related to the activities of JSC NC KTZ.

The above list may be supplemented with other documents, taking into account the specifics of the activities of structural divisions and subsidiaries.

12. Operations and risk management

The Company and its subsidiaries have identified risks that pose a potential threat and a significant impact on the environment, established procedures and defined criteria for the implementation and management of these risks.

Environmental protection is carried out by:

developing and implementing action plans for environmental protection activities aimed at ensuring environmental protection;
voluntary and compulsory environmental insurance;
implementation of industrial environmental control;
carrying out scheduled preventive maintenance.

Compulsory environmental insurance is carried out in accordance with the Law of the Republic of Kazakhstan "On Compulsory Environmental Insurance". The types, conditions and procedure of voluntary environmental insurance are determined by agreements between the Company/Subsidiaries and insurers.

Regulatory technical documents in the Company and its Subsidiaries regarding environmental aspects are reviewed with the introduction of new standard rules and regulations, new technological processes, installations, machines and equipment. Obtaining the necessary regulatory and permitting documents in the field of environmental protection in the Company and its Subsidiaries is carried out in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan.

The process of managing the operations of providing information on possible

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significant environmental impacts associated with the transportation of products and services and with the processes of use, end-of-life and disposal of its products and services is implemented during the implementation of industrial environmental control in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan.

13. Emergency prevention, preparedness and elimination of their consequences

The management of the emergency prevention and response system is carried out in accordance with the requirements of the Standard "Prevention and Response of Emergency Situations in JSC NC KTZ and its Subsidiaries, approved by a separate local act of the Company.

Employees who discover a violation of environmental requirements, norms, rules and instructions or a danger threatening human life and health, as well as the possibility of environmental pollution, are obliged to immediately take all measures in their power to eliminate or localize the situation and report this in accordance with the standard "Incident Management with identification of their root causes in JSC "NC "KTZ" and its Subsidiaries approved by a separate local act of the Company.

The owner of the process is obliged to inform the authorized body in the field of environmental protection about accidents involving the release and discharge of pollutants into the environment within two hours from the moment of their detection in accordance with the requirements of the Environmental Code.

The elimination of natural and man-made emergencies and their consequences is carried out in accordance with the requirements of the Law of the Republic of Kazakhstan "On Civil Protection". The elimination of the consequences of emergency situations is carried out in accordance with the requirements of the Standard for the Prevention and Elimination of Emergency Situations in JSC NC KTZ and its subsidiaries, approved by a separate local act of the Company.

14. Verification

14.1 Measurement and monitoring

To carry out accounting, analysis and assessment of the state of environmental management at all levels of management of the Company and subsidiaries, information is collected, information is summarized and reports are submitted to the management of the Company and subsidiaries.

The analysis of the state of environmental protection is carried out by divisions of the linear and regional levels on a monthly basis, and is provided to divisions of the network level.

The network-level divisions of the Company and its Subsidiaries monitor the

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implementation of environmental protection action plans and environmental protection conditions and submit them to the Inspection:

1) a report on the implementation of the environmental action plan in accordance with Annex 3 to these Guidelines - quarterly until the 5th day of the month following the reporting quarter;.

2) a report on the state of environmental protection in accordance with Appendix 4 to these Guidelines - quarterly, until the 10th day of the month following the reporting quarter;

3) information on current environmental indicators in accordance with Appendix 5 to these Guidelines - quarterly, until the 10th day of the month following the reporting quarter.

The following explanatory notes are attached to the reports:;
analysis of the current situation regarding the implementation of environmental protection measures;

information on the disbursement of planned funds;

information on the reasons for increasing or decreasing the amount of emissions into the environment.

Environmental protection monitoring in the departments of the linear and regional levels is carried out in accordance with the program of industrial environmental control.

Industrial environmental control is carried out by operators of category I and II facilities on the basis of an industrial environmental control program, which is part of an environmental permit, as well as an environmental efficiency improvement program.

Compliance of actual emissions of pollutants into the atmosphere and discharges of polluted water from sources of emissions into the environment with the permitted maximum permissible standards is carried out by carrying out instrumental measurements by a specialized contractor.

Regional and line-level divisions provide, in accordance with the established procedure, reports to the territorial state authorized environmental protection bodies required in accordance with the legislation of the Republic of Kazakhstan.

14.2. Internal control of environmental management

The Company conducts internal audits of the integrated management system in accordance with the Rules for Conducting an internal audit of the Management system of JSC NC KTZ Group of Companies, approved by a separate act of the Company.

In order to monitor compliance with regulatory legal acts of the Republic of Kazakhstan and regulatory and technical documents in the field of ecology, control over the state of environmental protection, identify environmental aspects and assess

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risks, eliminate inconsistencies identified during previous audits, as well as implement environmental protection measures, the Company's group conducts internal control of the state of environmental protection at various levels of management. Wednesday.

Inspections in the field of environmental protection of the Company's structural divisions and subsidiaries are carried out in accordance with the Standard "Conducting internal control of activities in the field of industrial safety", approved by a separate act of the Company.

At the same time, responsible persons who are responsible for organizing environmental protection work in a regional-level subdivision, as part of monitoring the state of the environment and for the purpose of monitoring environmental protection activities, should periodically conduct internal control over production sites at the regional and linear management levels.

Based on the results of the internal control of the units, the audited party develops corrective measures to eliminate inconsistencies in accordance with paragraph 14.4 of these Guidelines.

14.3. Performance analysis

The environmental management review is conducted once a quarter at all management levels of the Company and its subsidiaries.

The process owners are responsible for collecting and providing an analysis of safety indicators by type of activity.

The input data for the analysis of the state of environmental management are:

- changes in internal and external factors related to environmental protection;
- needs and expectations of stakeholders;
- information from external stakeholders, including complaints;
- information about opportunities for improvement;
- information on the state of environmental protection and the implementation of environmental action plans;
- execution (status) of regulations issued by state regulatory authorities and based on the results of internal control;
- analysis of the causes of identified violations during internal control, internal audit and review of regulations of state regulatory authorities;
- effectiveness of measures taken to manage significant environmental risks and establish new goals and objectives in the field of environmental protection;
- information on training and advanced training of employees of the Company and its subsidiaries, the
- results of a previous analysis of the effectiveness of the process.

An analysis of the effectiveness of the Company's environmental activities is conducted once a year by the Company's top management.

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14.4 Continuous improvement

Nonconformity management and corrective actions

Based on the results of state and internal environmental control, the structural divisions of the Company and its subsidiaries carry out corrective actions.

Corrective actions can be taken based on the results:

- 1) analysis of information received from stakeholders
- 2) analysis and evaluation of the effectiveness of business processes by the heads of structural divisions and management

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- 3) monitoring the activity of the process and measuring the results of the activity;

- 4) identification of nonconforming products or services (after the delivery of products, during or after the provision of services);

- 5) analysis and assessment of compliance with the requirements of regulatory legal acts of the Republic of Kazakhstan, local acts of JSC NC KTZ, subsidiaries, as well as international standards of management systems, interstate and national standards, technical regulations.

Nonconformity management in the Company and its subsidiaries is carried out in accordance with the Company's internal documents regulating the procedure for nonconformity management, incident management with identification of their root causes, and emergency prevention.