

Annual  
report  
**2024**



# ENERGY OF DEVELOPMENT

KEGOC JSC



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# LETTER FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS

GRI 2-22

## DEAR SHAREHOLDERS!

I am proud to present to you the Annual Report of KEGOC JSC for 2024. This report is not just figures and facts, but the result of the joint work of our team, a reflection of achievements and ambitious plans for the future.

2024 has become a real landmark year for our company. We have successfully coped with the challenges, ensuring the reliability of the National Power Grid with growing electricity consumption. The launch of new large-scale projects confirmed our commitment to improving the reliability of energy supply and the active development of renewable energy sources.

An important aspect of our work was the introduction of modern technologies, including digitalization and energy storage systems. These steps open up new opportunities to streamline processes and increase efficiency.

The Board of Directors has been actively working to achieve financial performance and the interests of all our stakeholders. We have revised our development strategy until 2032, taking into account the current challenges and needs of the industry. This includes an adjusted investment program aimed at meeting the growing needs of the economy and improving efficiency.

We continue the practice of offsite meetings to better understand the work of our branches and strengthen the team spirit. This allows us to find new ways to improve our work and interaction with partners.

The financial results of 2024 confirm our resilience and reliability. The dividend payments to our shareholders are a testament to our successful management. High credit ratings from international agencies strengthen investor confidence and open up new opportunities for financing our infrastructure projects.

In the field of safety, we reached zero in terms of LTIFR and FAR, and the number of technological violations decreased by 34%. This testifies to the high level of professionalism and responsibility of our team.

I sincerely thank all KEGOC JSC employees for their dedication and high achievements. Due to your efforts, we are confidently moving forward, reaching new heights in the energy industry.

We are optimistic about the future, knowing that joint efforts and a desire to innovate will help us achieve all our goals and objectives.

**YERNAT BERDIGULOV**Chairman of the Board of Directors  
of KEGOC JSC



# LETTER FROM THE CHAIRMAN OF THE MANAGEMENT BOARD

GRI 2-22

DEAR COLLEAGUES, SHAREHOLDERS, PARTNERS, INVESTORS AND STAKEHOLDERS!

We are pleased to present to you the KEGOC JSC Annual Report for 2024, in which we summarize our work and outline ambitious plans for 2025. This report reflects the results of our joint work and the commitment to improvement that we continue to demonstrate throughout the year.

We have achieved significant success in the past year. Due to the well-coordinated work of our team, KEGOC JSC has demonstrated steady growth in both production and financial activities. Electricity consumption in Kazakhstan increased by 4.3%, reaching 120 billion kWh, and generation increased by 4.5%, reaching 117.9 billion kWh. We have ensured the stable operation of the National Power Grid.

I would like to note the well-coordinated and high-quality work of the entire KEGOC JSC team, due to which the preparation of electric grid facilities for the autumn-winter maximum loads was carried out in a timely and high-level manner. We have ensured trouble-free and safe operation in production, which has become a confirmation of our commitment to safety standards. We were recognized as the best industrial safety company among the enterprises of the Samruk-Kazyna JSC group, and this is a truly impressive achievement.

The financial results are also encouraging: the Company's net profit amounted to 59.5 billion tenge, which is 37.1% higher than in 2023. We pay dividends to shareholders in the amount of 44.6 billion tenge, and our credit ratings have been upgraded to the country's level, which confirms the confidence of investors.

We continue to implement major infrastructure projects, including strengthening the electricity grids in the south of the country and combining the energy system of Western Kazakhstan with a Single Energy System. In 2024, agreements were signed with the Asian Development Bank, the European Bank for Reconstruction and Development and Development Bank of Kazakhstan JSC, which opens up new horizons for our development.

Social policy also remains our priority. We are proud to be the leader among the Samruk-Kazyna Group companies in terms of industrial safety and social stability. In 2024, we implemented a number of initiatives aimed at improving the quality of life of our employees, including salary increases and support for specialized education.

We look to the future with confidence and determination. In 2025, we will continue to modernize the energy system and implement investment projects, focusing on improving the reliability and safety of our work. The heads of the branches have been tasked with implementing the investment program, carrying out high-quality repairs and strengthening security measures.

KEGOC JSC is confidently moving forward, ensuring the reliability of Kazakhstan's energy system and the company's steady growth. I'm grateful all for your dedication and contribution to the common cause. Together we can reach even greater heights!



**NABI AITZHANOV**

Chairman of the Management  
Board of KEGOC JSC



# KEY EVENTS OF KEGOC JSC FOR 2024

JANUARY 1

KEGOC JSC has confirmed its high social stability rating at **86%**.

JANUARY 30

KEGOC JSC's report on green bond issuance for 2023 has been successfully verified by the Green Finance Centre (AIFC)

MARCH 12

Following the results of the KASE KEGOC JSC competition, it became the winner in the nomination "For the successful implementation of SPO"

MARCH 15

Standard&Poor's confirms KEGOC JSC credit rating

FEBRUARY 1

Fitch upgraded KEGOC JSC's rating to **"BBB"**, the forecast is "Stable"

FEBRUARY 9

Moody's has confirmed KEGOC JSC's rating at **BAA2**. The outlook is "positive"

FEBRUARY 9

The RPA (Robotic Process Automation) robotics project, implemented by the KEGOC JSC team together with KPMG based on the popular Blue Prism platform, was recognized as the best robotics project at the Project of the Year competition organized by the Global CIO IT community

FEBRUARY 19

KEGOC JSC is recognized as the leader in the field of industrial safety among the Samruk-Kazyna JSC group of companies

FEBRUARY 29

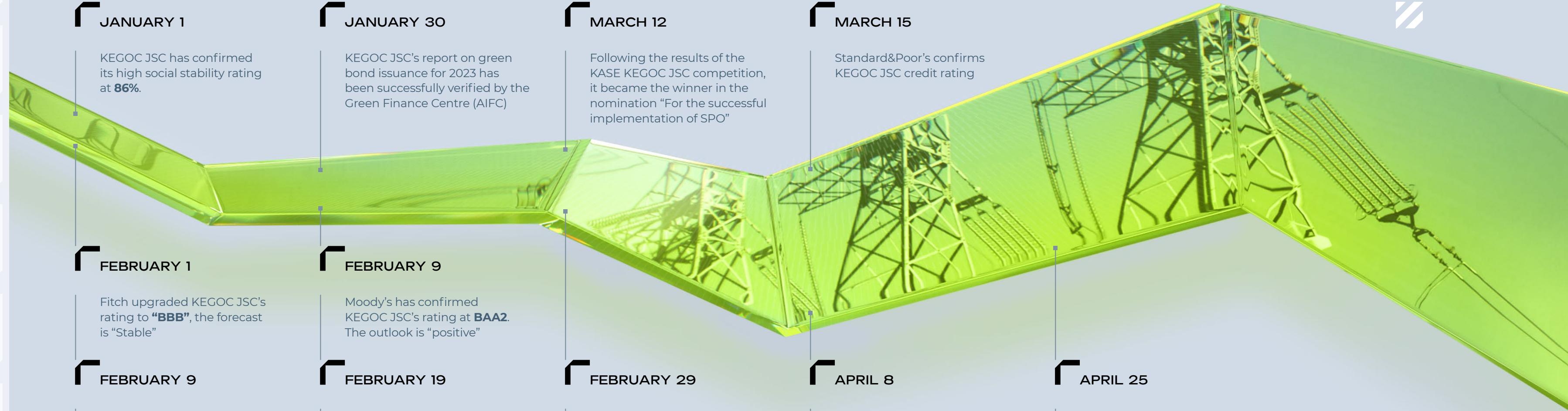
KEGOC JSC participated in the meeting of heads of energy systems of Kazakhstan, Kyrgyzstan, Tajikistan, Uzbekistan and Russia on the development of national power grids

APRIL 8

KEGOC JSC took an active part in flood relief efforts. **107** integrated brigades have been organized to carry out emergency recovery work at power grid facilities

APRIL 25

Public hearings were held in front of consumers and other interested parties, where a report was presented on the implementation of the approved tariff estimates, on the implementation of the approved investment program, on compliance with quality and reliability indicators of regulated services and on achieving performance indicators for natural monopoly entities by the end of 2023





# KEY EVENTS OF KEGOC JSC FOR 2024

**MAY 2**

The Annual General Meeting of KEGOC JSC Shareholders was held, at which the financial statements for the year ended December 31, 2023 were approved. The shareholders of KEGOC JSC decided to allocate **97%** of the net profit for 2023 to dividends

**MAY 17**

KEGOC JSC hosted a meeting with suBGPiface users on cooperation in ensuring reliable power supply to the western energy hub

**MAY 23**

Within the framework of the 41st meeting of the Coordinating Electric Power Council of Central Asia KEGOC JSC, the results of the work of the Kazakh energy system during the autumn-winter load period were presented, and they also participated in the discussion of the action plan to ensure the stability of electricity supply in the Central Asian Electric Power Ring system in the autumn-winter period of 2024-2025

**MAY 28**

The Board of Directors of KEGOC JSC approved the updated strategy of the Company

**MAY 30**

KEGOC JSC paid dividends based on the results of the second half of 2023

**JUNE 4**

The KEGOC JSC Issuer's Day was held at the AIX site in Astana in a hybrid format (online-offline)

**JUNE 13**

KEGOC JSC and ENI plan to connect the first hybrid power plant in Mangystau region to the National Power Grid of Kazakhstan

**JULY 2-4**

KEGOC JSC and China Energy International Group signed a memorandum of cooperation in the field of electric grid development and discussed further cooperation

**JUNE 7**

KEGOC JSC Issuer's Day was held at the KASE site in Almaty

**JULY 19**

KEGOC JSC and the Asian Development Bank (ADB) have signed a financing agreement in the amount of **58.2 billion tenge** for the implementation of a project to strengthen the electric grid of the Southern UPS zone of Kazakhstan

**AUGUST 6**

KEGOC JSC participates in the first meeting of Central Asian Energy Ministers

**SEPTEMBER 9**

KEGOC JSC launches project to unite the West with UPS of Kazakhstan

**SEPTEMBER 9**

KEGOC JSC and the Asian Development Bank signed a memorandum to support Kazakhstan's transition to renewable energy sources

**SEPTEMBER 10**

KEGOC JSC and Hitachi Energy signed a memorandum of cooperation

**AUGUST 28**

KEGOC JSC and MASDAR discussed the implementation of the **1000 MW** wind farm construction project in Zhambyl region

**SEPTEMBER 11**

Moody's Ratings upgraded KEGOC JSC's rating to **"Baa1"** Stable outlook

**SEPTEMBER 20**

KEGOC JSC and Siemens Energy discussed prospects for cooperation at the Kazakh-German Business Forum



# KEY EVENTS OF KEGOC JSC FOR 2024

OCTOBER 11

An Extraordinary General Meeting of KEGOC JSC Shareholders was held, which approved KEGOC JSC's financial statements as of and for the six months ended June 30, 2024. The shareholders of KEGOC JSC decided to allocate **64.5%** of net profit for dividends based on the results of operations for the first half of 2024

OCTOBER 17

KEGOC JSC participates in the meeting of the Coordinating Electric Power Council

19 DECEMBER

KEGOC JSC celebrates its anniversary — **10 years** since entering the stock exchange. The total amount of dividends paid by KEGOC JSC since the IPO amounted to **282 billion tenge**

30 DECEMBER

KEGOC JSC concluded offtake contracts worth **19.5 billion tenge** in 2024

NOVEMBER 4

KEGOC JSC paid dividends on shares for the first half of 2024

NOVEMBER 19

The KEGOC JSC Issuer's Day was held at the AIX site in Astana

NOVEMBER 5

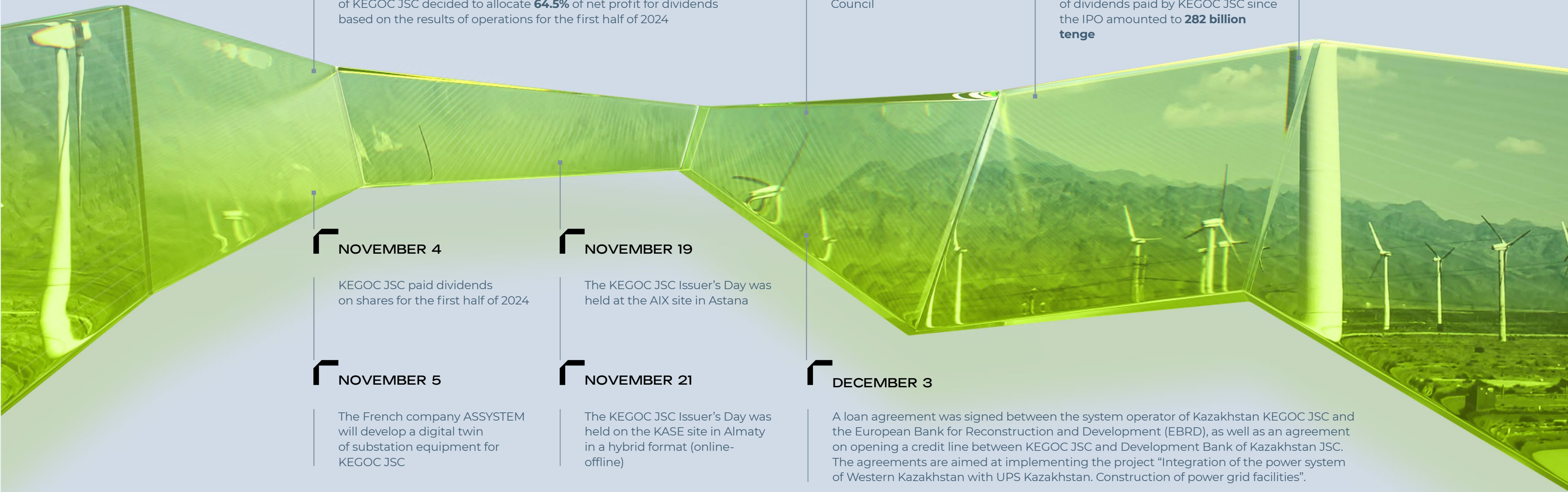
The French company ASSYSTEM will develop a digital twin of substation equipment for KEGOC JSC

NOVEMBER 21

The KEGOC JSC Issuer's Day was held on the KASE site in Almaty in a hybrid format (online-offline)

DECEMBER 3

A loan agreement was signed between the system operator of Kazakhstan KEGOC JSC and the European Bank for Reconstruction and Development (EBRD), as well as an agreement on opening a credit line between KEGOC JSC and Development Bank of Kazakhstan JSC. The agreements are aimed at implementing the project "Integration of the power system of Western Kazakhstan with UPS Kazakhstan. Construction of power grid facilities".





# KEY FIGURES OF KEGOC JSC FOR 2024

## PRODUCTION INDICATORS

27,905.418  
km



Length of overhead  
power lines

18.96  
billion kWh



The volume of transmitted  
electric energy

110.9  
billion kWh



The volume of services  
provided for technical  
dispatching of supply  
to the grid and consumption  
of electric energy

1,629



Total number of service  
consumers

56.75  
million tenge



The amount of costs for  
technological development

74.9  
billion kWh



The volume of services  
provided for the use of NPG





# KEY FIGURES OF KEGOC JSC FOR 2024

## FINANCIAL AND ECONOMIC INDICATORS

59.5  
billion tenge



Net profit

131.5  
billion tenge



EBITDA

319,905.9  
million tenge



Income from core  
activities



## INDICATORS FOR SUSTAINABLE DEVELOPMENT

4,495  
person



Number of employees  
by Company

6.2%



Staff turnover

0



LTIFR

2,370,678  
tons of CO<sub>2</sub>-eq



Greenhouse gas emissions  
(Scope 1+2)

829.2  
million tenge



The amount of funds  
allocated for social support  
of employees



# ABOUT COMPANY

11	Company profile
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# COMPANY PROFILE

GRI 2-1

KEGOC JSC WAS ESTABLISHED IN ACCORDANCE WITH THE RESOLUTION OF THE GOVERNMENT OF THE REPUBLIC OF KAZAKHSTAN DATED SEPTEMBER 28, 1996 NO. 1188 “ON CERTAIN MEASURES FOR STRUCTURAL RESTRUCTURING OF THE ENERGY SYSTEM MANAGEMENT OF THE REPUBLIC OF KAZAKHSTAN” AND IS THE COMPANY MANAGING THE NATIONAL POWER GRID (NPG) OF THE REPUBLIC OF KAZAKHSTAN AND IS ENDOWED WITH THE STATUS OF THE SYSTEM OPERATOR OF THE UNIFIED POWER SYSTEM (UPS) OF THE REPUBLIC OF KAZAKHSTAN. THE DATE OF THE COMPANY’S INITIAL STATE REGISTRATION IS JULY 11, 1997.

KEGOC JSC operates in the territory of the Republic of Kazakhstan. Until 2006, 100% of KEGOC JSC shares were owned by the state. In 2006, the state-owned stake (100%) was transferred to pay for the outstanding shares of JSC “Kazakhstan Holding for the Management of State Assets “Samruk”. In 2008, through the merger of joint-stock companies Kazyna Fund for Sustainable Development and Kazakhstan Holding for State Asset Management Samruk, Samruk-Kazyna National Welfare Fund JSC was established, which is the legal successor of Kazakhstan Holding for State Asset Management Samruk JSC.

On December 18, 2014, as part of the implementation of the Program for the withdrawal of shares of Samruk-Kazyna JSC subsidiaries and Affiliates on the securities market, 25,999,999 shares of the Company’s declared common shares were placed on KASE by subscription.

To implement the Comprehensive Privatization Plan for 2021-2025, approved by the Government of the Republic of Kazakhstan, in 2023, KEGOC JSC SPO was conducted through the placement of 15,294,118 common shares. Thus, the share of Samruk-Kazyna JSC is 85% of the total number of shares of the Company.

15,294,118  
common shares

were placed as part  
of KEGOC JSC SPO in 2023



85%

of the total number of the  
KEGOC JSC shares is owned  
by Samruk-Kazyna JSC





# MISSION AND VALUES

## THE COMPANY'S VISION

THE UPS SYSTEM OPERATOR OF THE REPUBLIC OF KAZAKHSTAN, CONTRIBUTING TO THE CHANGE OF THE ENERGY SYSTEM OF THE FUTURE AND THE MARKET IN THE CONTEXT OF THE ENERGY TRANSITION, MEETING THE GROWING NEEDS OF THE ECONOMY AND CONTRIBUTING TO THE DEVELOPMENT OF A SUSTAINABLE ELECTRIC POWER SYSTEM THROUGH INFRASTRUCTURE PLANNING AND THE DEVELOPMENT OF CLEAN ENERGY.

## THE COMPANY'S MISSION

IS TO ENSURE RELIABILITY, ACCESSIBILITY AND ADVANCED DEVELOPMENT OF THE ENERGY SYSTEM OF THE REPUBLIC OF KAZAKHSTAN.

The development Plan (Strategy) is aimed at the long-term sustainable development of the Company, takes into account the impact of global trends related to the energy transition and the integration of renewable energy into the energy system, provides for processes related to the decarbonization of the economy and ensuring economic growth in the country, the need to address issues related to the shortage of electric energy and capacity in the medium term in the Republic of Kazakhstan, the introduction of modern innovative and digital technologies, R&D, commitment to ESG principles.

# COMPANY STRUCTURE

GRI 2-6

THE COMPANY'S STRUCTURE INCLUDES 9 BRANCHES OF INTERSYSTEM ELECTRIC NETWORKS (MES) AND A BRANCH OF THE NATIONAL DISPATCH CENTER OF THE SYSTEM OPERATOR (NDC SO).

NDC SO provides centralized dispatch control to UPS of the Republic of Kazakhstan. The centralized operational dispatch control in UPS of the Republic of Kazakhstan is organized according to the scheme of direct operational subordination of NDC SO 9 regional dispatch centers (RDC), which are structural divisions of KEGOC JSC branches of MES.

The Company is also the sole shareholder of its subsidiary Energoinform JSC, whose mission is to ensure reliable operation and efficient development of UPS information and telecommunications infrastructure in the Republic of Kazakhstan using advanced technologies and best international practices. The main activity is the maintenance of the KEGOC JSC information and telecommunications complex, including: ASCAPC, SCADA, balancing electricity market, IMS, PLC, RRC,

satellite communication, guaranteed power supply, PBX, FOCL, fire and security alarm system and corporate services.

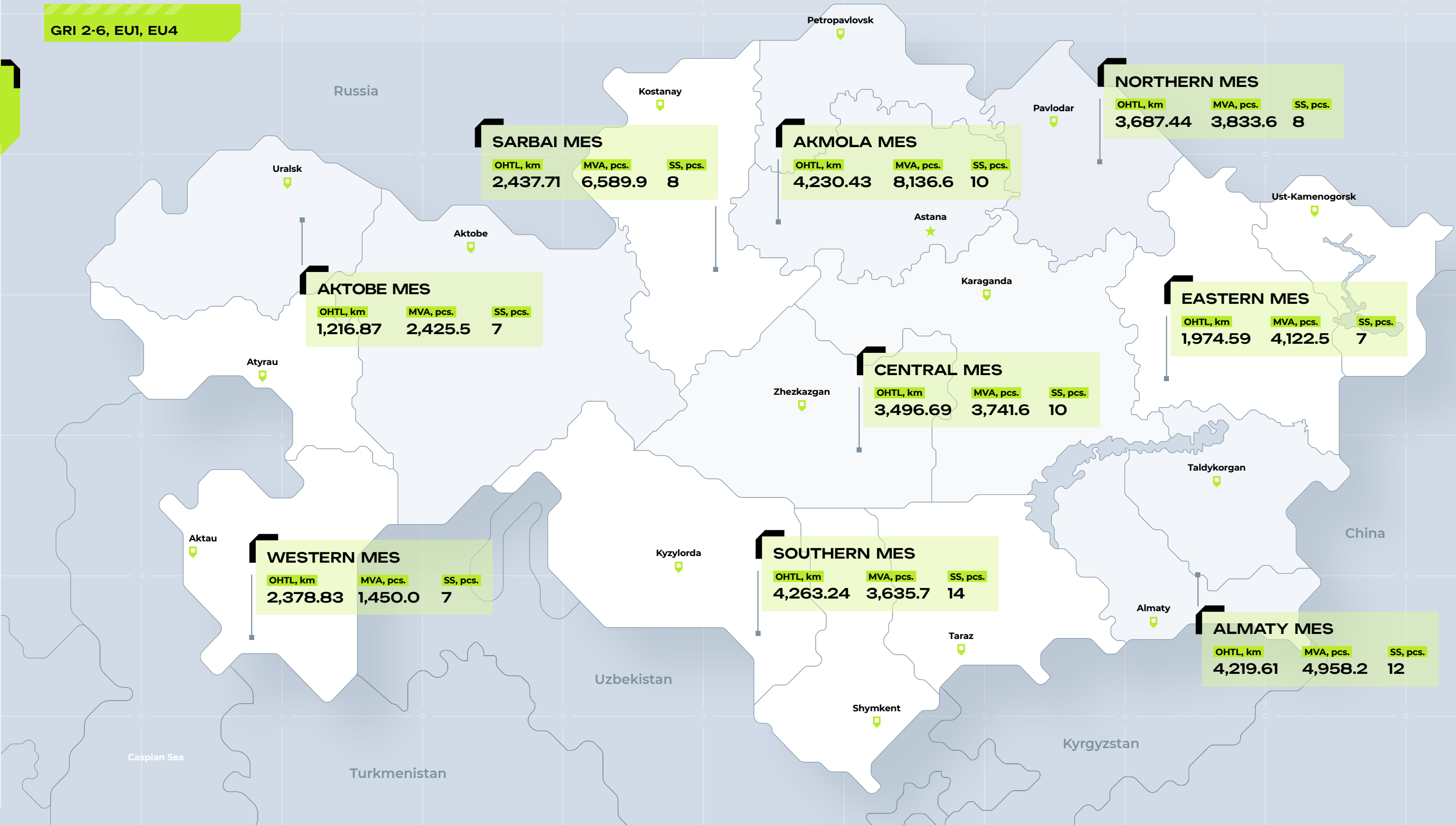
In addition, KEGOC JSC is a shareholder (20% of shares) of Batys Transit JSC, established in 2005 to implement the project "Construction of the interregional PTL North Kazakhstan — Aktobe region".





# GEOGRAPHY OF ACTIVITY

GRI 2-6, EU1, EU4



27,905.418  
km

total length of overhead  
transmission lines

38,893.6  
MVA

installed capacity  
of transformers

83  
SS

total number of substations  
with voltage of 35-1150 kV



# BUSINESS MODEL

GRI 2-6

## MISSION

Ensuring reliability, accessibility and advanced development of energy system of Kazakhstan

## VALUES

- ◆ Fairness and honesty
- ◆ Challenge and development
- ◆ Unity and responsibility
- ◆ Traditions and respect

## VISION

The system operator of the UPS of Kazakhstan, contributing to the change of the energy system of the future and the market in the context of the energy transition, providing for the increasing needs of the economy and contributing to the development of a sustainable electric power system through infrastructure planning and the development of clean energy

### ELECTRICITY PRODUCTION

Thermal and gas turbine power plants

Hydro power plants

Wind and solar power plants

Foreign power systems

### OUR ASSETS

- ◆ 83 SS with an installed transformer capacity of 38,893.6 MVA
- ◆ 27,905.418 km of OHTL
- ◆ 9 branches of MES and NDC SO
- ◆ 4,495 employees
- ◆ Modern technologies

### ELECTRICITY TRANSMISSION, NPG USAGE

Organization of balancing of production and consumption of electric energy

Technical dispatching of supply to the grid

### DISTRIBUTION, SUPPLY AND CONSUMPTION

Power supply organisations

Power transmission organisations

Large industrial consumers

Foreign power systems

### OUR ACTIVITIES

- ◆ Power transmission — 19.96 billion kWh
- ◆ NPG usage — 74.93 billion kWh
- ◆ Technical dispatching of supply to the grid — 110.89 billion kWh
- ◆ Organization of balancing of production and consumption — 210.29 billion kWh

### OUR RESULTS

- ◆ Net profit — KZT 59.5 billion
- ◆ Dividends paid per 1 share KZT 79.5 for the 2nd half of 2023 KZT 82.4 for the 1st half of 2024;
- ◆ Reliability indicators: GA — 99.99987%, AIT — 0.671 million
- ◆ Social stability rating — 87%

## UN SUSTAINABLE DEVELOPMENT GOALS



01

02

03

04

05

06

07

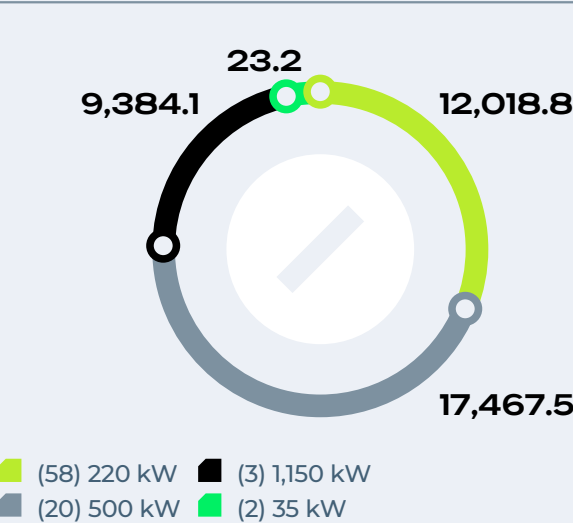


# CAPACITIES

GRI 2-6, SASB IF-EU-000.C

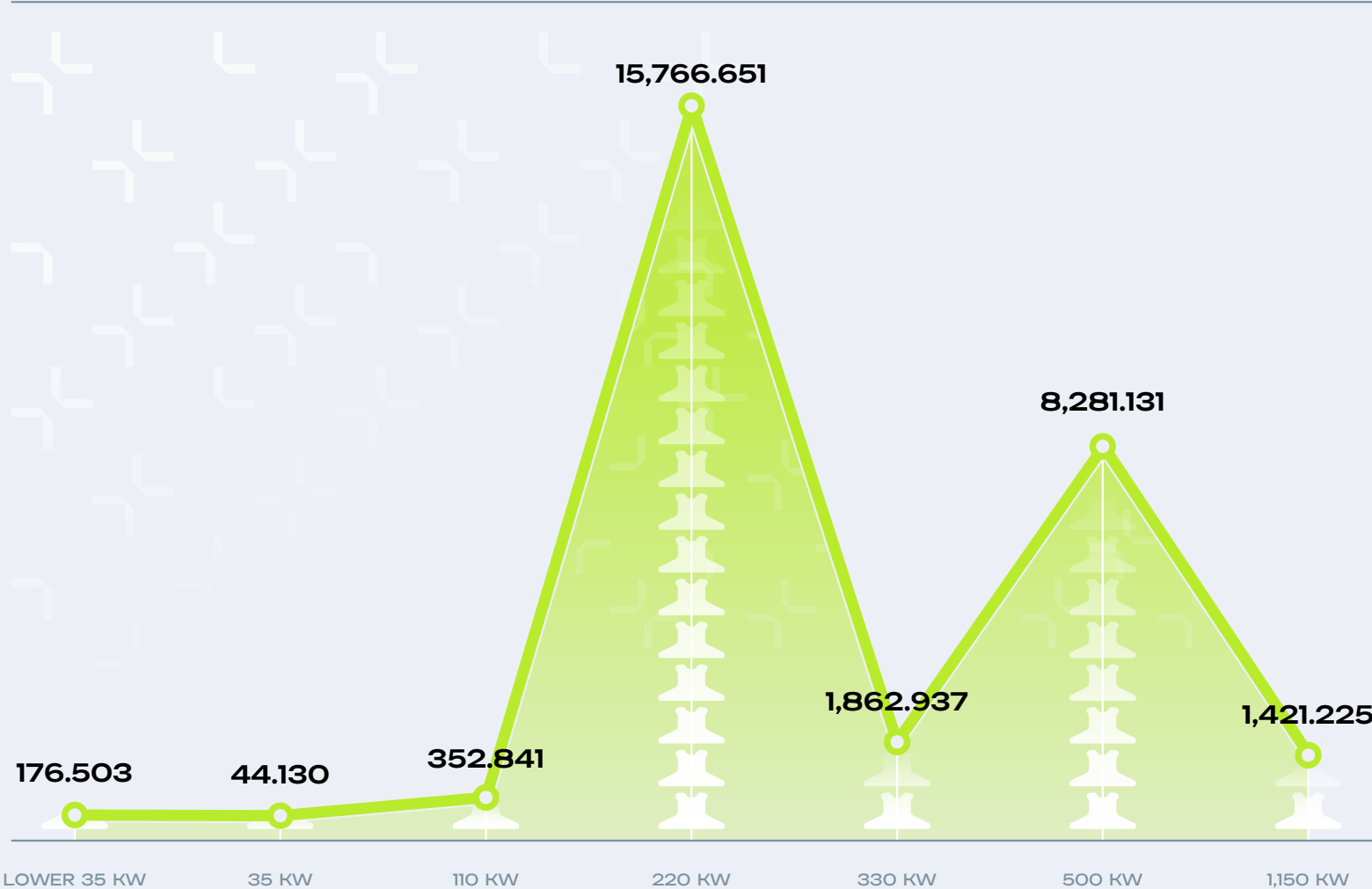
## KEGOC JSC ASSETS AS OF DECEMBER 31, 2024

Capacity and number of substations of KEGOC JSC as of 31.12.2024, MVA



The main asset of the Company is NPG, which by the end of 2024 consists of 398 overhead lines (OL) with dimensions of 0.4-1150 kV with a total length of 27,905.418 km (via circuits) and 83 substations (SS) with a voltage of 35-1150 kV with an installed transformer capacity of 38,893.6 MVA. They serve to ensure cross-border electricity flows, supply electricity from power plants, and provide connectivity between regional electric power companies and large consumers.

KEGOC JSC overhead line length as of 31.12.2024, km



38,893.6  
MVA

installed capacity  
of transformers





# STRATEGIC REVIEW



17	Industry structure
20	Electricity balance
23	Development Plan (Strategy)



The main directions of the state policy in the field of electric power industry are developed and determined by the Government of the Republic of Kazakhstan. The Ministry of Energy of the Republic of Kazakhstan is the State authorized body responsible for the management of the electric power industry. Supervision and control in the field of electric power industry is carried out by the state body — the Committee for Atomic and Energy Supervision and Control of the Ministry of Energy of the Republic of Kazakhstan.

The Committee for Regulation of Natural Monopolies of the Ministry of National Economy of the Republic of Kazakhstan is a state body responsible for monitoring and regulating activities related to the sphere of state monopoly (including the activities of the Kazakhstan Electricity Grid Operating Company Joint-Stock Company (KEGOC JSC) as a natural monopoly entity).

**UPS of the Republic of Kazakhstan is a set of power stations, PTL and SS. Electric power industry of the Republic of Kazakhstan includes the following sectors:**

- ♦ production of electric energy;
- ♦ transmission of electric energy;
- ♦ supply of electric energy;
- ♦ consumption of electric energy;
- ♦ other activities in the field of electric power industry.

# INDUSTRY STRUCTURE

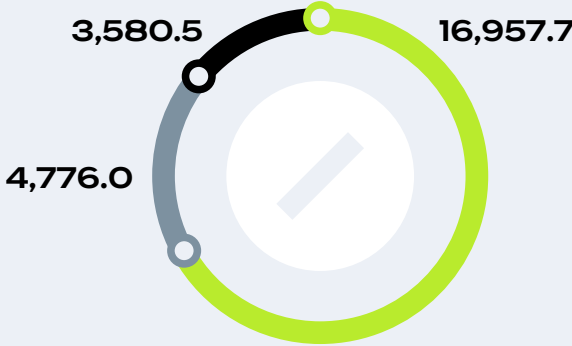
## ELECTRICITY PRODUCTION SECTOR

The production of electric energy in the Republic of Kazakhstan is carried out by 233 electric power plants of various forms of ownership. The total installed capacity of power plants in the Republic of Kazakhstan as of January 1, 2025 is 25,314.2 MW; available capacity is 18,890.3 MW (available capacity of RES (SPP, WPP, small HPP) is indicated in accordance with the methodology for calculating the projected balance of electric capacity: damless HPP operating via watercourse — 30%; WPP — 20%; SPP — 0% of the available capacity).

### Electric energy production in the Republic of Kazakhstan, MW

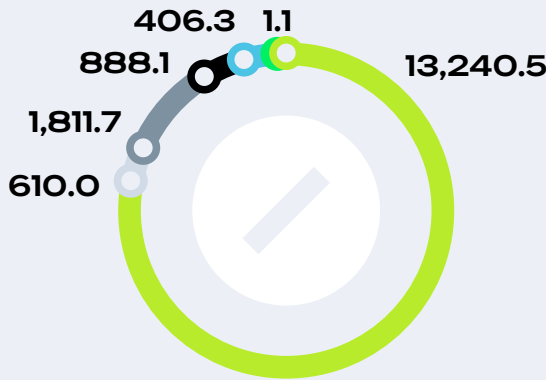
Power plants	Installed capacity, MW
<b>Total thermal power plants:</b>	<b>19,740.8,</b>
Steam turbine, of which:	17,631.5,
- pulverized carbon	13,592.0
- on gas and fuel oil	4,039.5,
Gas Turbine engines	2,109.3,
<b>Wind farms</b>	<b>1,525.7,</b>
<b>Solar power plants</b>	<b>1,216.6,</b>
<b>Hydroelectric power plants, of which:</b>	<b>2,830.0,</b>
- small	295.2,
<b>Biogas plants</b>	<b>1.1,</b>
<b>Total</b>	<b>25,314.2</b>

### Installed capacity of power plants by zone, MW



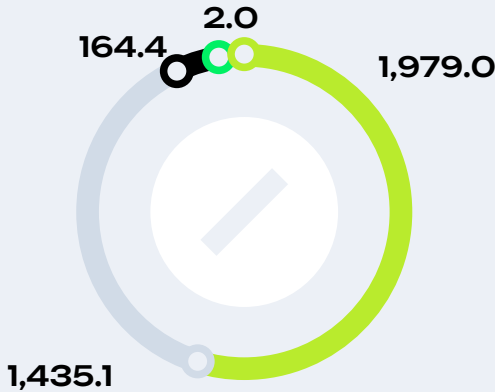
■ Northern zone ■ Southern zone ■ Western zone

### Northern zone, MW



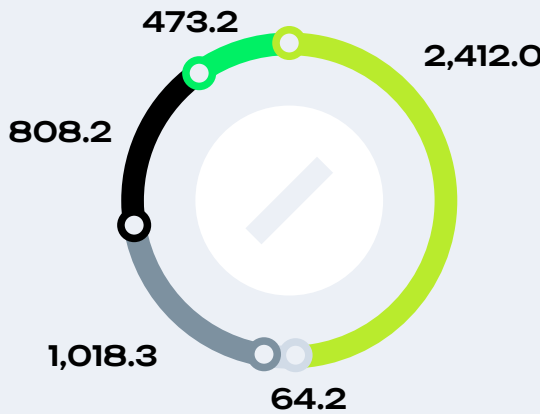
■ TPP ■ GTPP ■ HPP ■ WPP ■ BGP ■ SPP

### Western zone, MW



■ TPP ■ GTPP ■ WPP ■ SPP

### Southern zone, MW



■ TPP ■ GTPP ■ HPP ■ WPP ■ SPP



Installed capacity of power plants by region, MW

<b>Aktobe region:</b>	<b>21.1</b>
WPP Khromtau LLP "KEZ"	12.5
HPP "Green Capital Kazakhstan" LLP	8.6
<b>Almaty Region:</b>	<b>3</b>
HPP Kargaly LLP "WPP Tolkin"	3
HPP Kakpak LLP "Konaev and Company"	2.2
<b>Atyrau Region:</b>	<b>14</b>
WPP Dossor LLP "Divitel"	48
TGTES-1 TCO — dismantling of gas turbine No. 6.2	-34
<b>East Kazakhstan Region:</b>	<b>-30</b>
Ridder CHPP — dismantling of steam turbine No. 5	-30
<b>Zhambyl Region:</b>	<b>20</b>
SPP Aralsk LLP "AEC Asa"	20
<b>Zhetysu Region:</b>	<b>16.9</b>
HPP Verkhne-Baskan HPP-2 LLP "Baskan Power"	10.6
HPP Verkhne-Baskan HPP-3 LLP "Baskan Power"	4.3
HPP Korgas RSE on REU "Kazvodkhoz"	2
<b>Karaganda Region:</b>	<b>53.9</b>
WPP Hyperborea LLP "Hyperborea"	53.9
<b>Kostanay Region:</b>	<b>3</b>
Arkalyk CHPP — installation of steam turbine No. 2	3
<b>Pavlodar Region:</b>	<b>540</b>
Ekibastuz GRES-1 — installation of power unit No. 1	540
<b>Turkestan Region:</b>	<b>30</b>
Shoulder TPP LLP "PKOP"	30
<b>Ulytau Region:</b>	<b>0.34</b>
SPP LLP "Barg"	0.34

672.2  
MW



of new generating capacity  
was commissioned in 2024





## ELECTRIC ENERGY TRANSMISSION SECTOR

The electric networks of the Republic of Kazakhstan are a set of SS, switchgear and connecting PTLs with a voltage of 0.4-1150 kV, designed for the transmission and (or) distribution of electrical energy. The role of the backbone network in the UPS of the Republic of Kazakhstan is performed by NPG, which provides electrical connections between the regions of the Republic of Kazakhstan and the energy systems of neighboring countries (the Russian Federation, the Kyrgyz Republic and the Republic of Uzbekistan), as well as the supply of electric energy by electric power plants and its transmission to wholesale consumers. substation, switchgear, inter-regional and (or) interstate PTL and PTL delivering electric energy to electric power plants with a voltage of 220 kV and above, which are part of NPG, are on the balance sheet of KEGOG JSC.

Regional-level electric grids provide electrical connections within regions, as well as the transmission of electric energy to retail consumers, and are maintained and operated by regional electric grid companies.

Energy transmission organizations carry out, on the basis of contracts, the transmission of electric energy through their own or used (lease, leasing, trust management and other types of use) electric networks to consumers of wholesale and retail markets or energy supply organizations.

## ELECTRIC ENERGY SUPPLY SECTOR

The electric energy supply sector in the Republic of Kazakhstan consists of energy supply organizations that purchase electric energy from a Single buyer of electric energy and then sell it to end-users.

Since January 1, 2025, the functions of electric power supply have been performed by regional electric grid companies.



## WHOLESALE ELECTRIC ENERGY MARKET

**The subjects of the wholesale electricity market are:**

- ◆ energy producing organizations;
- ◆ energy transmission organizations;
- ◆ energy supply organizations;
- ◆ electricity consumers who purchase electricity on the wholesale market in the amount of at least 1 MW of average daily (base) capacity, including digital miners, administrators of hybrid groups;
- ◆ the system operator whose functions are performed by KEGOC JSC;
- ◆ operator of centralized trade in electric energy and capacity, whose functions are performed by KOREM JSC;
- ◆ A single buyer of electric energy (Settlement and Financial Center for support of renewable energy sources LLP).

The list of subjects of the wholesale electric energy market is formed by the system operator.

According to the current market model, a single electricity buyer is centrally purchased from energy-producing organizations and sells planned electricity included in the daily schedule to wholesale consumers. Financial settlements of imbalances in UPS of Kazakhstan (deviations from the daily schedule) are carried out on the balancing market, where the operator is the settlement center of the balancing market.

Given that this model lacks the “targeting” of electricity distribution and, accordingly, the technical ability to determine the supply route from the producer to the consumer, the Law “On Electric Power Industry” introduced a “new” NPG service, which is provided by the system operator to wholesale market entities when buying and selling electricity from a single buyer and on a balancing market.

**As part of the new market model, KEGOC JSC continues to play a major role in the market and performs the following main functions:**

- ◆ provides system services;
- ◆ It is the holder of an upgraded hardware and software complex, a balancing market system, which is the main instrument for the functioning of the wholesale market and the management of the balancing electric energy market;
- ◆ performs physical regulation of imbalances in the energy system by involving price requests from market participants from a ranked list, as well as within the framework of contractual relations for the settlement of deviations with the Russian Federation and the countries of Central Asia.





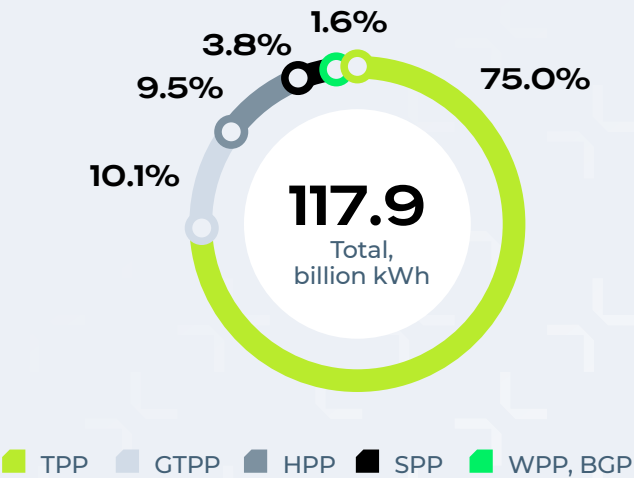
# ELECTRICITY BALANCE

Dynamics of electricity generation, billion kWh



Electricity generation in 2024 in the Republic of Kazakhstan amounted to 117,915.4 million kWh, which, in accordance with the output for the same period in 2023, increased by 5,072.7 million kWh or 4.5%.

Structure of electricity production by UPS power plants in the Republic of Kazakhstan in 2024



117,915.4  
mln kWh

electricity generation in 2024  
in the Republic of Kazakhstan

At the same time, an increase/decrease in output occurred at the following large power plants:

Power plants	mln kWh	%
CHP-2 JSC "Qarmet" (AMT)	▲ 548.2	33.1
JSC "Ekibastuz GRES-2 Station"	▲ 386.3	6.8
JSC "Zhambyl GRES"	▲ 371.3	12.1
CHP-3 JSC "Pavlodarenergo"	▲ 203.7	7.5
CHP-1 JSC "Aluminium of Kazakhstan"	▲ 170.5	8.7
Zhezkazgan CHP LLP "Kazakhmys Energy"	▲ 82.1	9.0
JSC "SevKazEnergoPetrovsk"	▲ 20.9	0.9
JSC "3-Energoortalyk"	▲ 18.0	2.1
LLP GRES "Topar"	▼ 524.9	13.3
JSC "EEC"	▼ 402.1	2.8
Ekibastuz GRES-1	▼ 324.8	1.4
ES AZF TNK "Kazchrome" (GTU)	▼ 127.2	16.0
JSC "AIES Almaty CHP-1"	▼ 101.7	23.7
JSC "AIES Almaty CHP-3"	▼ 76.3	8.0
JSC "AIES Almaty CHP-2"	▼ 53.5	2.1
Balkhash CHP LLP "Kazakhmys Energy"	▼ 15.0	1.6



In 2024, there was an increase in electricity generation at thermal power plants by 1,015.3 million kWh (+1.2%), at GTPP by 877.1 million kWh (+7.9%) and at RES (SPP, WPP, BGP) by 705.1 million kWh (+12.4%).

The renewable energy sources (RES) sector is showing steady growth and is becoming one of the most dynamically developing areas in the electric power industry of the Republic of Kazakhstan. The volume of electricity generation at RES facilities is increasing annually, which is facilitated by the implementation of government programs and initiatives aimed at developing “green” energy.

As part of its commitment to international low-carbon development goals, in May 2013, the Republic of Kazakhstan approved the Concept of Transition to a “green economy”, setting an ambitious goal: by 2050, the share of alternative and renewable energy sources should reach 50% in the country’s energy mix. In accordance with this Concept, as well as the Strategic Development Plan of the Republic of Kazakhstan until 2025, phased targets have been set for the share of RES in total electricity production:

- ◆ 3% by 2020,
- ◆ 6% by 2025,
- ◆ 10% by 2030,
- ◆ 50% (including alternative sources and RES) by 2050.

By the end of 2024 (according to NBC SO), 157 RES facilities with a total installed capacity of 3,038.6 MW operated in the Republic of Kazakhstan.:

- ◆ 57 WPP facilities with a capacity of 1,525.7 MW;
- ◆ 44 SPP facilities with a capacity of 1,216.6 MW;
- ◆ 55 HPP facilities with a capacity of 295.2 MW;
- ◆ 1 bioelectric power plant with a capacity of 1.1 MW.

In 2024, 8 RES facilities with a total capacity of 154.6 MW were commissioned.

By the end of 2024, the volume of electricity (according to NDC SO) generated by RES facilities amounted to 7.55 billion kWh (WPP — 4,497.6 million kWh; SPP — 1,895.6 million kWh; HPP — 1,161.3 million kWh; BioPPs — 0.6 million kWh) or 6.4% of the total electricity production, which is a 12.5% increase compared to 2023.

Information on the production of electric energy by RES facilities for 2024

Indicators	Units of measurement	2024
Installed capacity including:	MW	3,038.6
wind power plants	MW	1,525.7
small HPP	MW	295.2
solar power plants	MW	1,216.6
bio power plants	MW	1.1
Electricity generation including:	mIn kWh	7,555.1
wind power plants	mIn kWh	4,497.6
small HPP	mIn kWh	1,161.3
solar power plants	mIn kWh	1,895.6
bio power plants	mIn kWh	0.6
The share of generated electricity RES in the total volume of electric energy production	%	6.4

8  
RES facilities

were commissioned  
in 2024

154.6  
MW

total RES capacity  
of commissioned  
facilities in 2024



Electricity consumption by the Republic of Kazakhstan in the reporting period of 2024 increased by 4,908.3 million kWh (4.3%) compared to the same period of 2023 and amounted to 119,995.5 million kWh. In the Northern zone, electricity consumption increased by 1,814.1 million kWh (2.5%), in the Western zone of Kazakhstan by 1,588.3 million kWh (10.8%), in the Southern zone by 1,505.9 million kWh (5.6%).

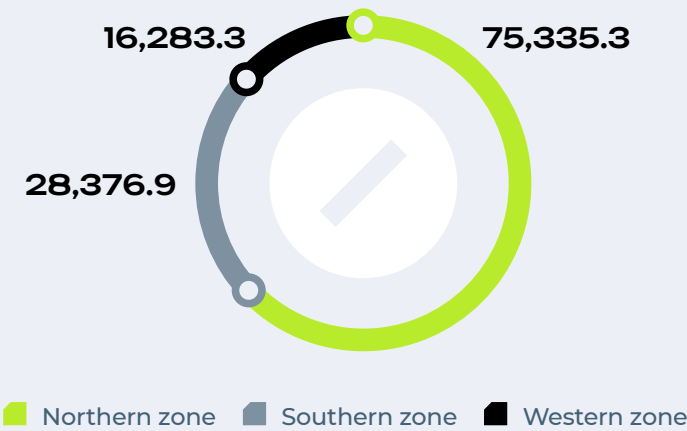
In comparison with 2023, the changes in electricity consumption were as follows:

The volume of electricity consumption in 2024 compared to 2023

Consumers	mIn kWh	%
"TNK Kazchrome" JSC (AZF)	▲ 342.4	10.8
TNK Kazchrome "Aksu Ferroalloy Plant"	▲ 276.5	5.4
"Sokolovsko-Sarbayskoe MPP" JSC (Mining and Processing Association)	▲ 158.6	12.4
"Kazakhmys Smelting" LLP	▲ 106.3	9.2
"Kazzinc" LLP	▲ 65.8	2.4
"ANPZ" LLP (Atyrau Oil Refinery)	▲ 65.3	8.6
"Aluminium of Kazakhstan" JSC	▲ 52.4	4.9
"Kazakhstan Electrolysis Plant" JSC	▲ 31.3	0.8
"Corporation Kazakhmys" LLP (ZCM, BCM, KCM — likely plant names like Zhezkazgan Copper Smelter, Balkhash Copper Smelter, Kounrad Copper Smelter)	▲ 22.5	1.4
"Qarmet" JSC	▼ 240.3	7.3
"Kazphosphate" LLP	▼ 86.0	4.4
"UKTMK" JSC (Ust-Kamenogorsk Titanium-Magnesium Plant)	▼ 6.0	0.9



Structure of electricity consumption  
by zone, million kWh



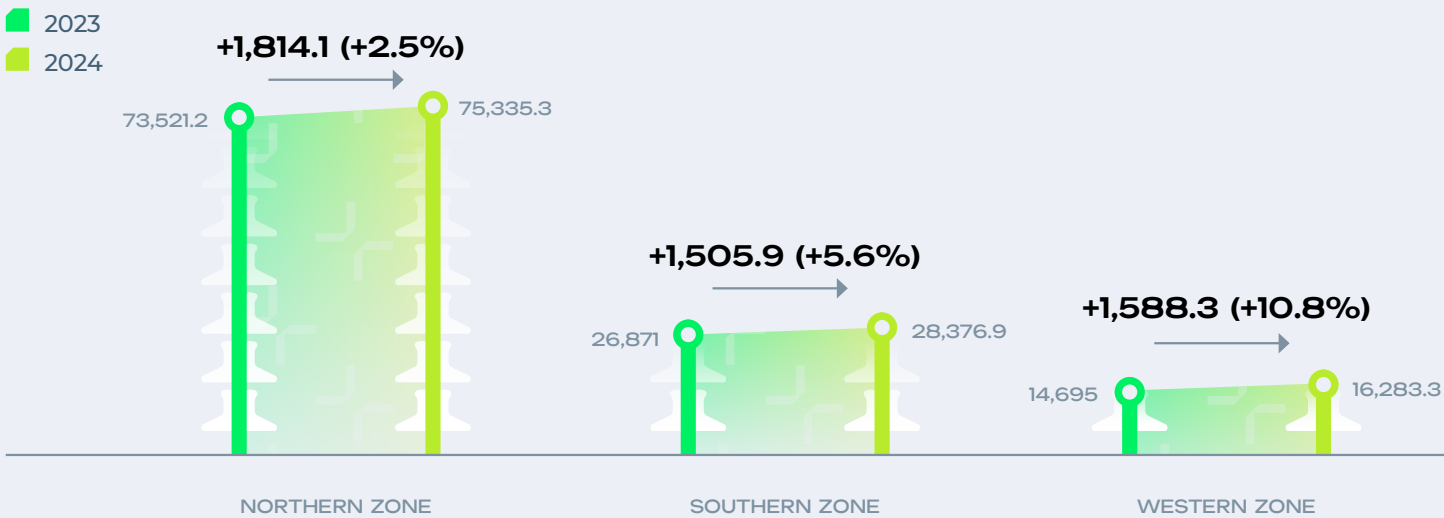
2,080.1  
million kWh

was the excess of electricity  
consumption over production  
in 2024



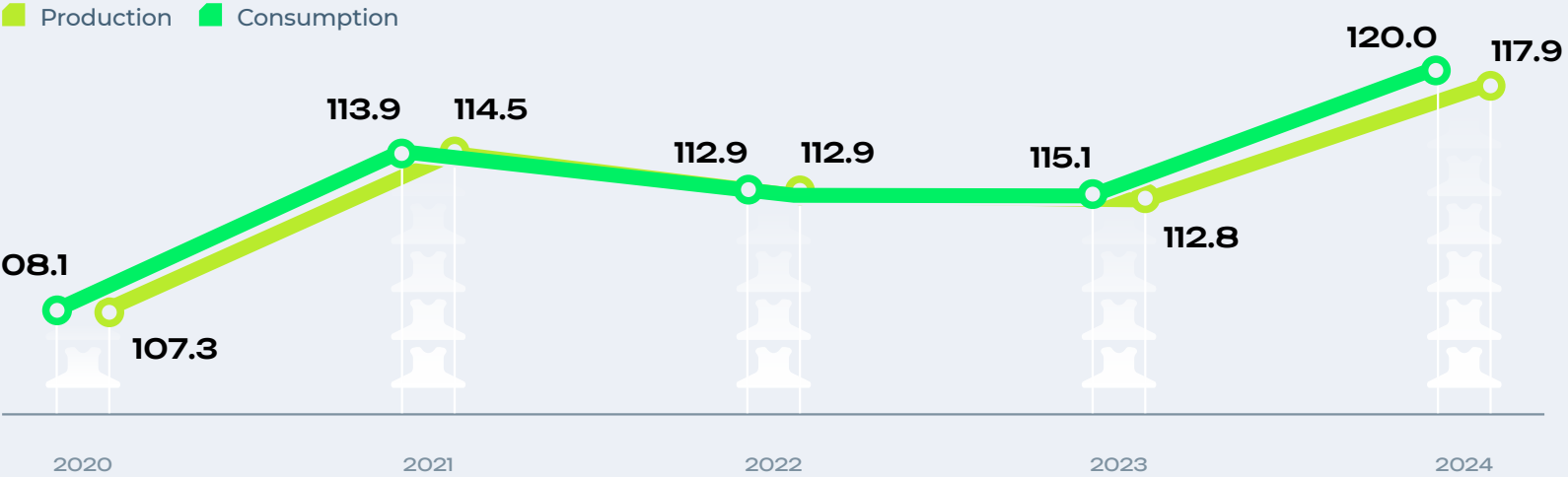
In 2024, compared with 2023, the maximum increase in electricity consumption was noted in Atyrau region by 11,416.1 million kWh (16.2%), Akmola region by 651.5 million kWh (5.9%), Almaty region by 621.6 million kWh (5.2%), Altai Territory by 10.6 million kWh (5.2%). Turkestan region by 497.7 million kWh (7.7%).

Dynamics of electricity consumption by zone for 2023-2024, million kWh



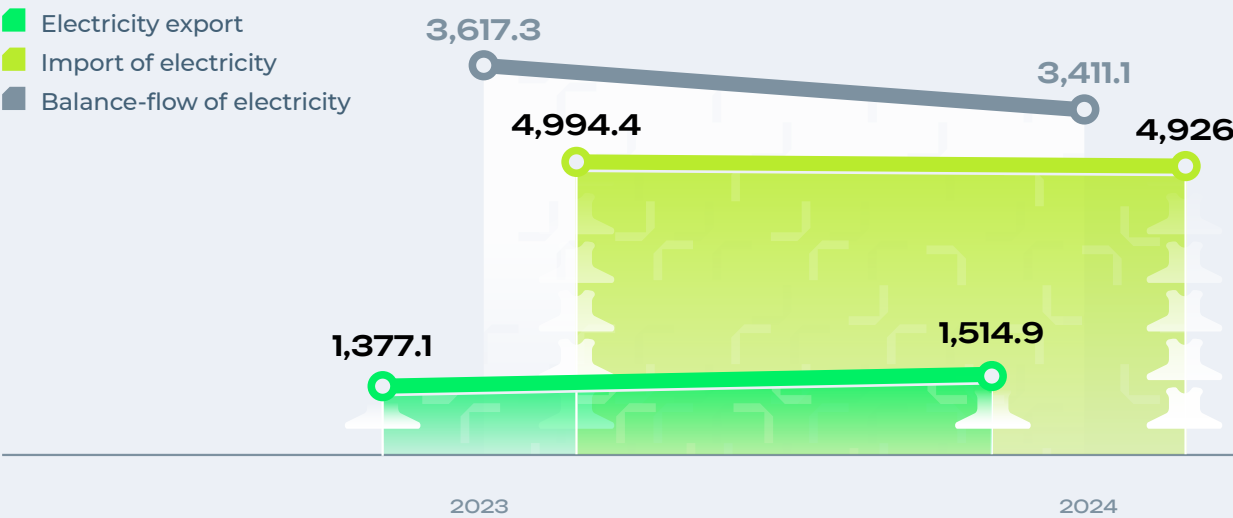
In 2024, electricity consumption exceeded production by 2,080.1 million kWh.

Dynamics of electricity production and consumption, billion kWh



During the reporting period, the balance of electricity flows with the Russian Federation amounted to 3,411.1 million kWh (in 2023, with the Russian Federation — 3,617.3 million kWh). At the same time, electricity exports to the Russian Federation amount to 1,514.9 million kWh (in 2023 — 1,377.1 million kWh). Electricity imports from the Russian Federation amount to 4,926.0 million kWh (in 2023 — 4,994.4 million kWh). Exports and imports are based on the volumes of balancing electricity with the Russian Federation.

Balance of electricity flow with the Russian Federation, million kWh



The flow balance with Central Asia is 1,331.0 million kWh (in 2023 from Central Asia 1,372.8 million kWh). At the same time, exports to Central Asia amounted to 1,624.1 million kWh (in 2023 — 1,441.0 million kWh). Electricity imports from Central Asia are 293.1 million kWh (in 2023 — 68.2 million kWh).



# DEVELOPMENT PLAN (STRATEGY)

GRI 2-12, 2-22, 2-23, 2-24

KEGOC JSC plays a strategically important role in the development of the economy of the Republic of Kazakhstan, influencing a wide range of stakeholders. This determines the responsible attitude of the Company to decision-making and the formation of a long-term development strategy. Our focus is on attentive attitude to the interests of society, ensuring the reliable operation of UPS of the Republic of Kazakhstan, the advanced development of NPG of the Republic of Kazakhstan, ensuring decent working conditions and well-being of people, and caring for the environment.

The status of the UPS system operator of the Republic of Kazakhstan determines the functions of KEGOC JSC to ensure parallel operation with the power systems of other countries, maintain balance in the power system, provide system services and purchase ancillary services from wholesale electricity market entities, as well as ensure the transmission of electricity via the NPG of the Republic of Kazakhstan, its technical maintenance and maintenance in operational readiness.

**THE DEVELOPMENT PLAN (STRATEGY) OF KEGOC JSC FOR 2023-2032 WAS APPROVED BY THE BOARD OF DIRECTORS OF THE COMPANY. WHEN DEVELOPING IT, THE REQUIREMENTS OF THE LEGISLATION OF THE REPUBLIC OF KAZAKHSTAN, NATIONAL PRIORITIES AND STATE PROGRAMS, INTERNATIONAL OBLIGATIONS, INCLUDING IN THE FIELD OF HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION, AS WELL AS THE EXPECTATIONS AND INTERESTS OF STAKEHOLDERS WERE TAKEN INTO ACCOUNT.**



Successful implementation of the strategy is based on a number of key factors:

- ◆ improving the efficiency of the Company's activities and introducing a portfolio approach to asset management and investment projects;
- ◆ taking into account the impact of ongoing changes in the electric power industry that have a significant impact on the development of the electric power industry (energy transition and decarbonization of the economy, the development of RES, digitalization of business, automation of processes and information security, etc.);
- ◆ transformation of people's consciousness.

The results of the latest strategic analysis of the current state of KEGOC JSC and SWOT analysis have shown that the main challenges for the Company affecting the effectiveness of its activities and which should be taken into account when defining strategic goals and objectives in the Development Plan (Strategy) are:

- ◆ insufficient capacity of the NPG of the Republic of Kazakhstan, taking into account the projected increase in workload;
- ◆ shortage of electric energy and capacity in the country in the medium term due to the growing consumer loads;
- ◆ the development of electricity, which has an impact on the reliable functioning of the electric grid;
- ◆ digitalization and automation of energy system management, as well as ensuring cybersecurity;
- ◆ an increase in the degree of deterioration of electrical networks and the associated risks of asset failure;
- ◆ implementation of the updated portfolio of investment projects and attraction of the cheapest borrowed funds for the implementation of large projects;
- ◆ introduction of a balancing market;
- ◆ the need for the Company's active participation in the formation of new approaches in the management of the electric power industry and the market model (design).



IN THIS REGARD, THE COMPANY’S DEVELOPMENT PLAN (STRATEGY) FOR 2023-2032 DEFINES THREE STRATEGIC GOALS:

STRATEGIC GOAL 1

**ENSURING RELIABLE OPERATION OF UPS OF THE REPUBLIC OF KAZAKHSTAN IN THE CONDITIONS OF ENERGY TRANSITION (RELIABILITY AND DEVELOPMENT OF NPG).**

Tasks

- 1. performing the functions of the UPS system operator of the Republic of Kazakhstan;
- 2. advanced development of the NPG of the Republic of Kazakhstan, effective integration of RES at the level of 19%;
- 3. the introduction of modern innovative and digital technologies, artificial intelligence for the formation of an intelligent energy system (Smart Grid).

Key indicators for achieving goals

**GA | AIT**



STRATEGIC GOAL 2

**ENSURING SUSTAINABLE DEVELOPMENT IN ACCORDANCE WITH THE PRINCIPLES OF ESG (SUSTAINABLE DEVELOPMENT).**

Tasks

- 1. Reducing the carbon footprint;
- 2. development of human capital;
- 3. improving corporate governance;
- 4. improvement of the occupational safety system.

Key indicators for achieving goals

**LTIFR | ESG-RATING**



STRATEGIC GOAL 3

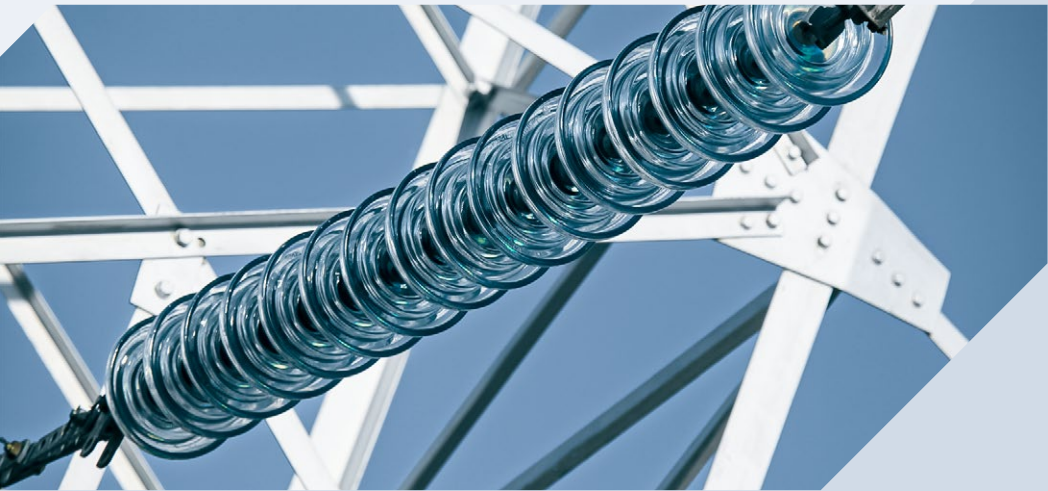
**INCREASE IN NET ASSET VALUE (FINANCIAL STABILITY).**

Tasks

- 1. strengthening financial stability;
- 2. formation and maintenance of a positive image of the Company;
- 3. development of international cooperation.

Key indicators for achieving goals

**TSR | EBITDA MARGIN**





# RELIABILITY AND DEVELOPMENT OF NPG

03. Reliability and development of NPG

>>>



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

- 26 Production activities
- 29 Working with consumers
- 32 Network reliability
- 34 Investment activity
- 36 Research and development activities



# PRODUCTION ACTIVITIES

GRI 2-6, SASB IF-EU-000.B

In accordance with the legislation of the Republic of Kazakhstan in the field of electric power industry, KEGOC JSC carries out the following main activities:

- ♦ electricity transmission through the NPG;
- ♦ NPG usage service;
- ♦ technical dispatching of electricity supply and consumption in the grid;
- ♦ organization of balancing of electricity production and consumption.

The above types of services belong to the sphere of natural monopoly, and therefore the activities of KEGOC JSC are regulated by the Law of the Republic of Kazakhstan “On Natural Monopolies”.

The Company has implemented and successfully operates a quality management system (QMS) based on the international standard ISO 9001, which is an integral part of the Company’s integrated management system. The scope of the QMS is to perform the functions of a system operator in the field of electric power industry: providing system services to subjects of the wholesale electricity market for the transmission of electric energy through the NPG, technical dispatching and balancing of electricity production and consumption.

In order to confirm compliance with the KEGOC JSC QMS, a supervisory audit was conducted in 2024, based on the results of a certification audit conducted in 2023 by the independent certification body MS CERTIFICATION SERVICES PRIVATE LIMITED

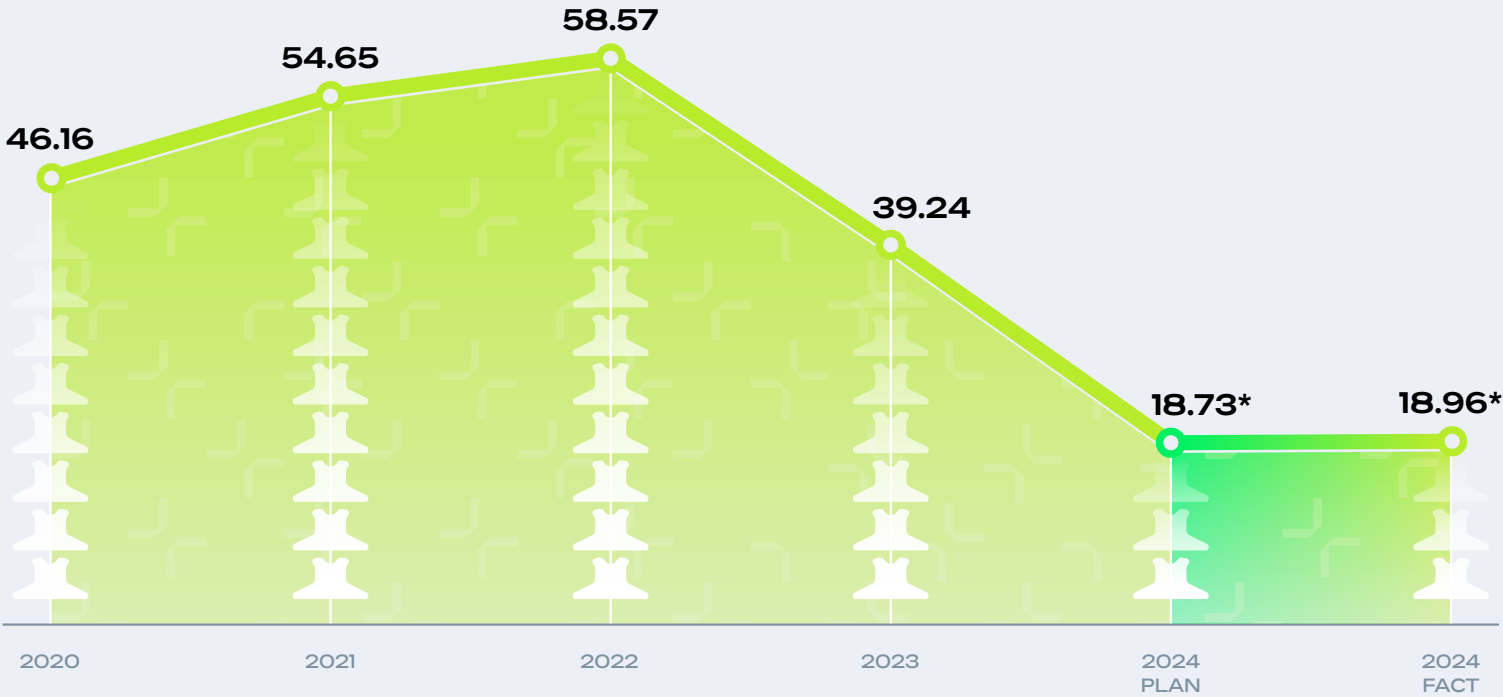
(India). The audit results confirmed the compliance of the QMS with the requirements of international standards.



## ELECTRICITY TRANSMISSION THROUGH THE NPG

SASB IF-EU-000.B

Transmission of electricity via KEGOC JSC networks, billion kWh



\*The Law of the Republic of Kazakhstan “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on administrative Reform in the Republic of Kazakhstan” amended the Law “On Electric Power Industry” regarding the introduction of a Single Electricity Buyer model and the launch of a balancing electricity market from July 1, 2023. In this regard, the structure of the volume of services for the transmission of electric energy by NPG has been changed.



The actual volume of electricity transmission services provided via NPG in 2024 amounted to 19.0 billion kWh, which is higher than planned by 0.23 billion kWh or 1.2%, due to an increase in the volume of electricity transmission through interstate transit.

Thus, according to the Law “On Electric Power Industry”, the NPG electric power transmission service is a service provided to conditional consumers, consumers of the hybrid group, during interstate transit of electricity, export/import of electricity and subjects of the wholesale electric energy market when they purchase electric energy under bilateral agreements from energy—producing organizations using renewable energy sources.

In this regard, the volume of services provided by KEGOC JSC for the transmission of electricity via NPG in 2023-2024 is indicated in accordance with the amendments to the Law “On Electric Power Industry”.

In 2024, interstate transmission (transit) of electricity was carried out via KEGOC JSC networks along the Russia–Kazakhstan–Russia route and the Russia–Kazakhstan–Kyrgyzstan route. The volume of electricity transit services provided amounted to 6.6 billion kWh. In addition, exports from the energy system of the Republic of Kazakhstan to the Kyrgyz Republic via KEGOC JSC networks in the amount of 1.2 billion kWh were carried out.

19.0  
billion kWh

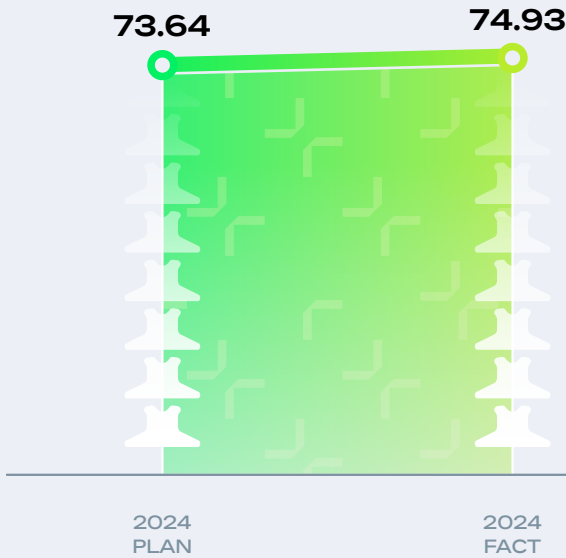
the actual volume of electricity  
transmission services provided via  
NPG in 2024



NPG USAGE SERVICE

SASB IF-EU-000.B

NPG usage service, billion kWh



In 2024, the actual volume of services provided for the use of NPG amounted to 74.9 billion kWh, exceeding the planned figure by 1.3 billion kWh, or 1.8%. The increase in volume is due to an increase in electricity consumption in the wholesale market of the Republic of Kazakhstan.

74.9  
billion kWh

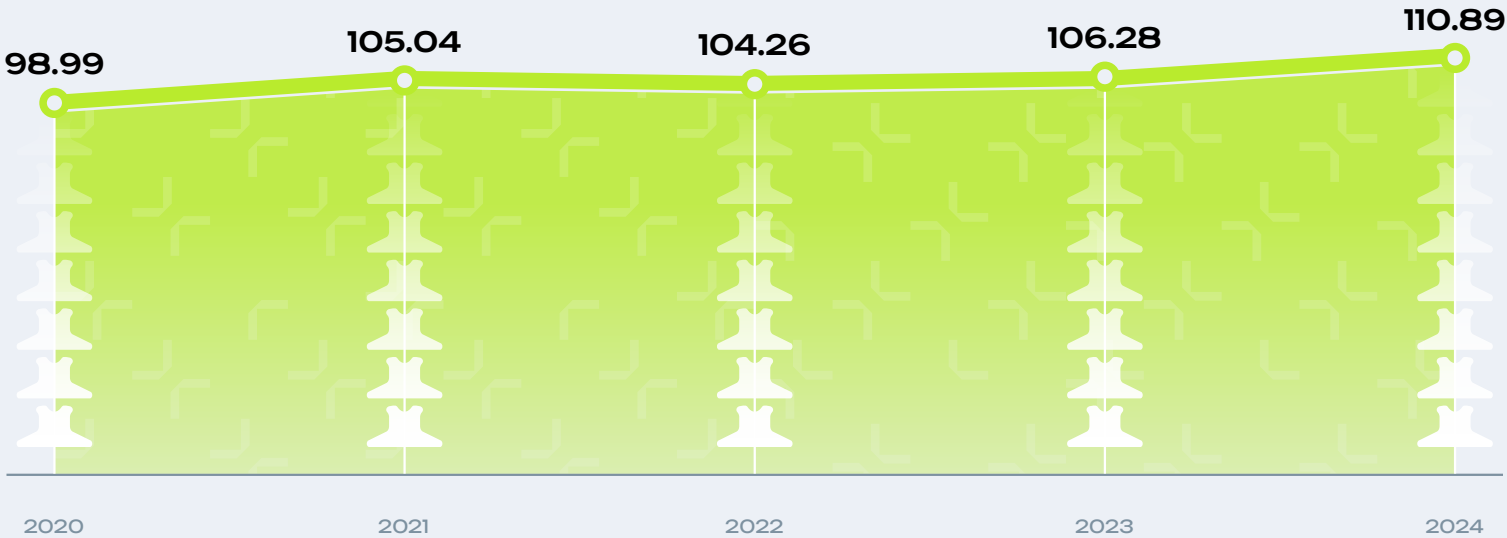
the actual volume of services  
provided for the NPG usage  
in 2024



TECHNICAL DISPATCHING

SASB IF-EU-000.B

Technical dispatching of KEGOC JSC , billion kWh



In 2024, the actual volume of services provided for technical dispatching of electricity supply to the grid and consumption amounted to 110.9 billion kWh, exceeding the planned figure by 4.6 billion kWh or 4.3%. The increase in volume is due to an increase in the volume of electric energy production in the wholesale market of the Republic of Kazakhstan.

110.9  
billion kWh

the actual volume of services provided for  
technical dispatching of electricity supply to the  
grid and consumption in 2024

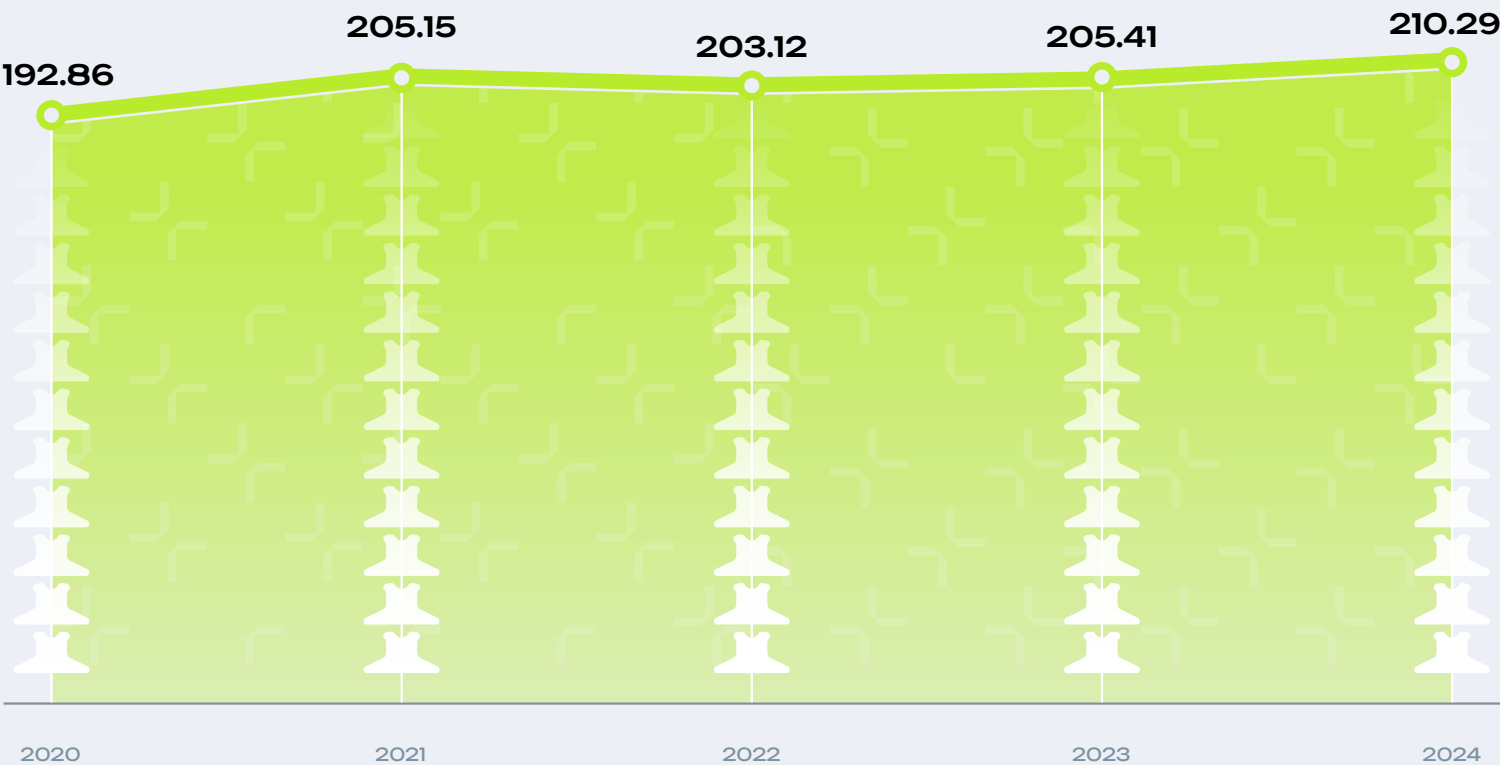




## ORGANIZATION OF BALANCING OF ELECTRICITY PRODUCTION AND CONSUMPTION

SASB IF-EU-000.B

Organization of balancing of electricity production and consumption, billion kWh



In 2024, the actual volume of services provided for balancing electricity production and consumption amounted to 210.3 billion kWh, exceeding the planned figure by 4.9 billion kWh or 2.4%. The increase in volume is attributed to the growth in electricity consumption in the wholesale market of the Republic of Kazakhstan.

**210.3**  
billion kWh

the actual volume of services provided for balancing electricity production and consumption in 2024



## ELECTRIC ENERGY PURCHASE AND SALE OPERATIONS

SASB IF-EU-000.E

In accordance with the Law “On Electric Power Industry”, KEGOC JSC performs the function of the UPS System Operator of the Republic of Kazakhstan for interaction with the energy systems of neighboring countries to manage and ensure the stability of parallel operation modes.

Electricity consumption in UPS of the Republic of Kazakhstan during the day has a pronounced unevenness: consumption decreases at night, increases by the beginning of the working day and reaches peak (maximum) values in the evening. At the same time, UPS of the Republic of Kazakhstan, where the main share of generating capacity is accounted for by thermal power plants, which, according to their technology, operate in the basic mode (they cannot quickly change their load), cannot fully cover the variable consumption schedule with its own power plants. As a result, there are imbalances between electricity production and consumption in UPS of the Republic of Kazakhstan. The situation of shortage of maneuverable generating capacities in UPS of the Republic of Kazakhstan is also aggravated by emergency shutdowns of equipment of existing power plants and high rates of commissioning of RES facilities, which are characterized by unstable generation. In this regard, maintaining the frequency and covering the emerging imbalances in UPS of the Republic of Kazakhstan is ensured, among other things, through interaction in parallel with UPS of the Russian Federation.

In accordance with the Agreement between the Governments of the Republic of Kazakhstan and the Russian Federation on measures to ensure parallel operation of the parties' energy systems dated

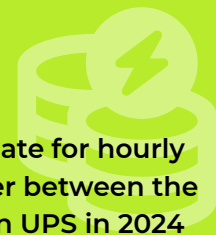
November 9, 2023, electricity purchase and sale agreements are concluded on an annual basis between KEGOC JSC and Inter PJSSC in order to compensate for hourly deviations in the actual interstate balance of electricity flow from the planned one at the UPS border of the Republic. Kazakhstan and UPS of the Russian Federation. In accordance with this Agreement, the financial result of the purchase and sale of deviations is a fair payment for the physical settlement of UPS deviations by the UPS power system of the Republic of Kazakhstan.

In 2024, the purchase of electricity by KEGOC JSC in order to compensate for hourly deviations in the actual interstate balance of electricity flow from the planned one at the border of UPS of the Republic of Kazakhstan and UPS of the Russian Federation amounted to 1,925.9 million kWh in the amount of 35,859.2 million tenge (18.62 tenge/kWh).

The sale of electric energy to KEGOC JSC, in order to compensate for hourly deviations in the actual interstate balance of electric energy flows from the planned one at the UPS border of the Republic of Kazakhstan and UPS of the Russian Federation, was carried out in the amount of 1,456.1 million kWh in the amount of 9,454.0 million tenge (6.49 tenge/kWh).

**1,925.9**  
mln kWh

electricity purchase to compensate for hourly imbalance volumes at the border between the Kazakhstan UPS and the Russian UPS in 2024





# WORKING WITH CONSUMERS

GRI 2-6, SASB IF-EU-000.A

CONSUMERS OF KEGOC JSC SERVICES ARE LEGAL ENTITIES: ENERGY PRODUCING, ENERGY TRANSMISSION, ENERGY SUPPLY ORGANIZATIONS, AND INDUSTRIAL ENTERPRISES.

When planning the volume of system services, the following factors are taken into account:

- the current economic situation in the country;
- development of regional generation and plans of consumers of system services to increase/decrease consumption;
- the possibilities of a circuit-based nature, in terms of optimizing repair work, contributing to the export and transit of electric energy to neighboring countries.

This makes it possible to effectively reduce the risks of deviations in the actual volume of services provided from the planned ones.

In 2024, KEGOC JSC ensured the provision of system services to wholesale market entities in full in accordance with concluded contracts and consumer requests.

**The total number of consumers with whom contracts were concluded in the reporting year was 1,629, of which:**

- Commercial organizations — 421;
- Industrial enterprises — 284.

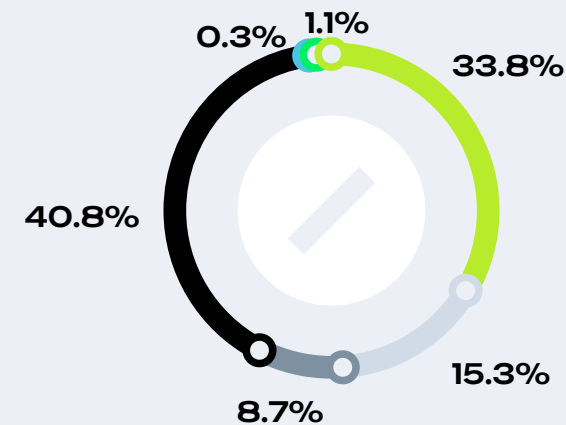
Total number of contracts and agreements for the provision of services to consumers, purchase and sale of electricity, starting in 2023 and concluded in 2024

56	621	196	729	2	1	6
for the transmission of electric energy via NPG	for NPG usage	for technical dispatching of supply to the grid and consumption of electric energy	for the organization of balancing production and consumption of electric energy	for the purchase of electricity to compensate for losses and for the economic needs	of the purchase and sale of balancing electric energy and negative imbalances	for the purchase of power regulation services
1		1		1	1	1
for the purchase of electric energy from the Russian Federation in order to compensate for hourly deviations of the actual interstate balance-flows of electric energy from the planned		for the sale of electric energy to the Russian Federation in order to compensate for hourly deviations of the actual interstate balance-flows of electric energy from the planned		provision of services for the transmission (transit) of electricity for ROSSETI PJSC	provision of services for the transmission (transit) of electricity for Electric Power Stations JSC	provision of services for the transmission (transit) of electricity for NPG of Kyrgyzstan JSC
1	1	1	1	1	1	1
provision of services for the transmission (transit) of electricity for SOLARKOIN LLC	provision of power regulation (frequency) services for NPG of Uzbekistan JSC	provision of power regulation (frequency) services for Uzenergosotish JSC	provision of power regulation (frequency) services for NPG of Kyrgyzstan OJSC	for the purchase of power regulation services from NPG of Kyrgyzstan OJSC	for the purchase of electricity to settle unplanned flows (from NPG of Uzbekistan JSC)	for the sale of electricity to settle unplanned flows (for NPG of Uzbekistan JSC)
1	1	2	1	1,629		
for the purchase of electricity to settle unplanned flows (from Uzenergosotish JSC)	for the sale of electricity to settle unplanned flows (for Uzenergosotish JSC)	for the purchase of electricity to settle unplanned flows (from NPG of Kyrgyzstan OJSC)	for the sale of electricity to settle unplanned flows (for NPG of Kyrgyzstan OJSC)	TOTAL		



Distribution of contracts  
by criteria, %

GRI 2-6, EU3



- Electricity supply organizations
- Electricity generation organizations
- Electricity transmission organizations
- Direct consumers
- Others
- Foreign counterparties

4.77  
points

the average annual  
assessment of consumer  
satisfaction in 2024

95%

the percentage  
of customer  
satisfaction in 2024

GRI 2-24, 2-26

To improve the quality of the services provided, KEGOC JSC has developed an internal standard "Management of system services and consumer claims". According to this standard, questionnaires are sent to all consumers of system services at least once a half-year, including a request to assess the level of work of the Company's staff, the reliability of business and technical information provided, the efficiency of work on consumer requests, the quality of system services, the quality of RDC work in terms of operational dispatch management and to make suggestions on to improve the quality of services provided by KEGOC JSC. Incoming responses are analyzed to improve the quality of the services provided.

GRI 2-25

In 2024, the average annual assessment of consumer satisfaction was 4.77 points on a five-point scale (100% of consumers were surveyed). The percentage of customer satisfaction is 95%. Appropriate measures are being taken according to the criteria that require improvement.

GRI 2-27

There were no fines imposed on the Company for non-compliance with legislation and regulatory requirements related to the provision of services in 2024.





# PROTECTING CONFIDENTIAL CONSUMER DATA

## GRI 418-1

The scale of KEGOC JSC's networking and global corporate activities requires the Company's careful attention to ensuring reliable protection of its consumers' information. In order to minimize the risks associated with this, the Company has a Consumer (customer) Privacy Policy aimed at ensuring transparency in the processing of personal data of consumers (customers) in accordance with the requirements of the legislation of the Republic of Kazakhstan. The list of collection and processing of personal information of KEGOC JSC consumers in accordance with the Policy includes:

- ◆ name and contact information;
- ◆ information about the actual volume of electricity consumption/generation;
- ◆ connection point information;
- ◆ financial information;
- ◆ identification information (contract number, personal account number).

The information collected is used for the purpose of providing system and related services, as well as fulfilling regulatory, contractual and legislative obligations.

KEGOC JSC provides consumers (clients) with the following options for managing their personal data:

- ◆ opt-in for data collection and processing;
- ◆ the right to opt out of certain types of processing;
- ◆ request for access to your data;
- ◆ request for correction or deletion of data;
- ◆ the ability to transfer data to other service providers.

Personal data of consumers (clients) Company are kept for the period necessary to achieve the purposes of their collection, and for 5 years after the termination of the relationship with the consumer, unless otherwise provided by the legislation of the Republic of Kazakhstan.

The following measures are applied to ensure the security of personal data:

- ◆ data encryption;
- ◆ regular updating of software and information security systems;
- ◆ multi-level access control and the use of secure passwords;
- ◆ conducting periodic audits in the field of cybersecurity and data protection.

**KEGOC JSC DOES NOT DISCLOSE CONSUMERS' PERSONAL DATA TO THIRD PARTIES, EXCEPT IN CASES WHERE IT IS NECESSARY TO COMPLY WITH THE LAW OR AT THE REQUEST OF AUTHORIZED LAW ENFORCEMENT AGENCIES OF THE REPUBLIC OF KAZAKHSTAN. THE DISCLOSURE OF PERSONAL DATA OF CONSUMERS IS CARRIED OUT STRICTLY IN ACCORDANCE WITH THE PRIVACY POLICY AND THE REQUIREMENTS OF THE LEGISLATION OF THE REPUBLIC OF KAZAKHSTAN.**

## GRI 2-27

**IN 2024, THERE WERE NO COMPLAINTS, APPEALS, LAWSUITS OR FINES RELATED TO VIOLATIONS OF THE CONFIDENTIALITY OF CONSUMERS' PERSONAL DATA.**

**KEGOC JSC DOES NOT USE CONSUMERS' PERSONAL DATA FOR SECONDARY PURPOSES AND DOES NOT MONITOR THE PROPORTION OF SUCH CASES, AS SUCH PRACTICES ARE NOT APPLIED.**



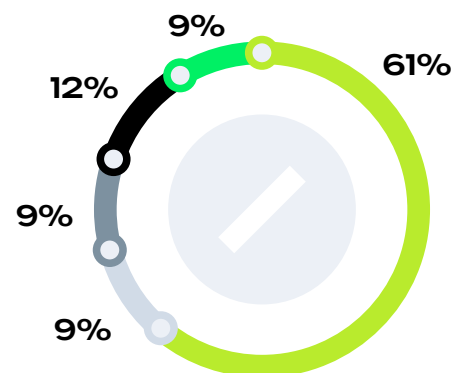


# NETWORK RELIABILITY

The electric power industry is important for the Republic of Kazakhstan, as the country's key industries, such as metallurgy and oil and gas production, are characterized by high energy intensity. Accordingly, the competitiveness of the industry of the Republic of Kazakhstan and the quality of life of the population largely depend on reliable and high-quality energy supply to consumers.

In 2024, the Company recorded and investigated 43 technological violations, of which 1 failure of the 1st degree and 42 failures of the 2nd degree, including: 33 technological violations occurred on power transmission lines, 10 technological violations occurred at substations. There were no accidents. Compared to 2023, the indicator has improved by 34%.

## Distribution of technological violations by classification criteria



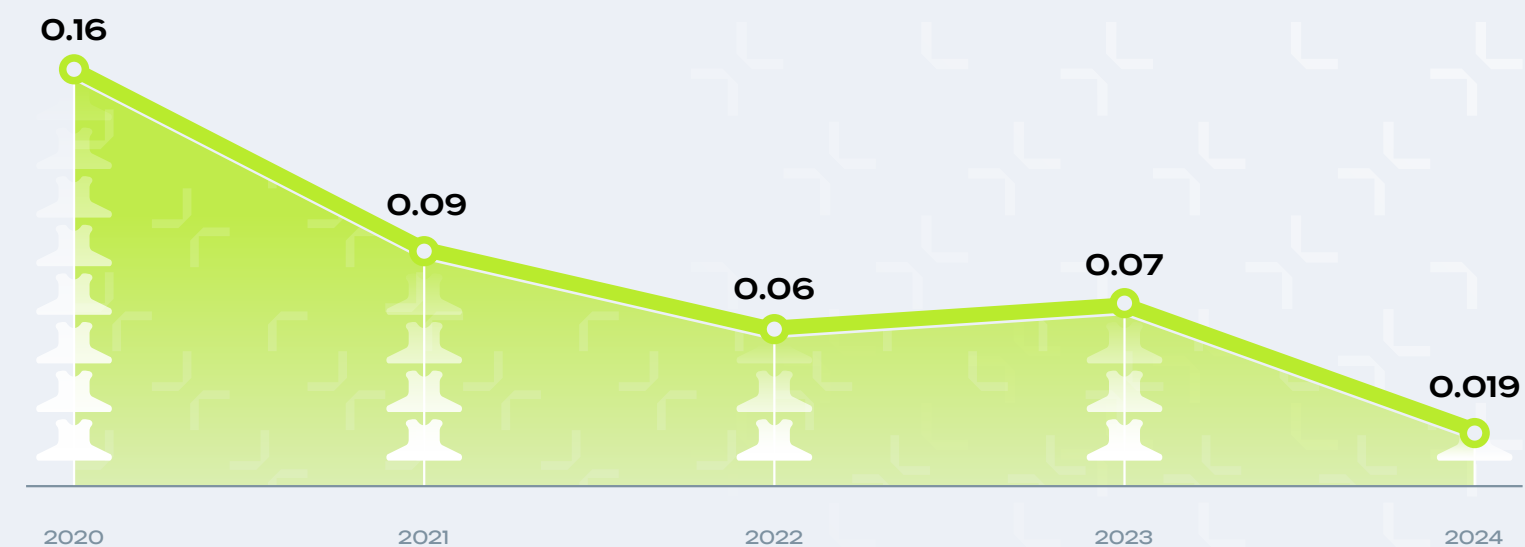
- Impact of natural phenomena
- Installation and construction defects
- Unclassified reasons
- Design and manufacturing defects
- Actions of third parties and organizations

The following indicators are used in international practice to assess the level of network reliability:

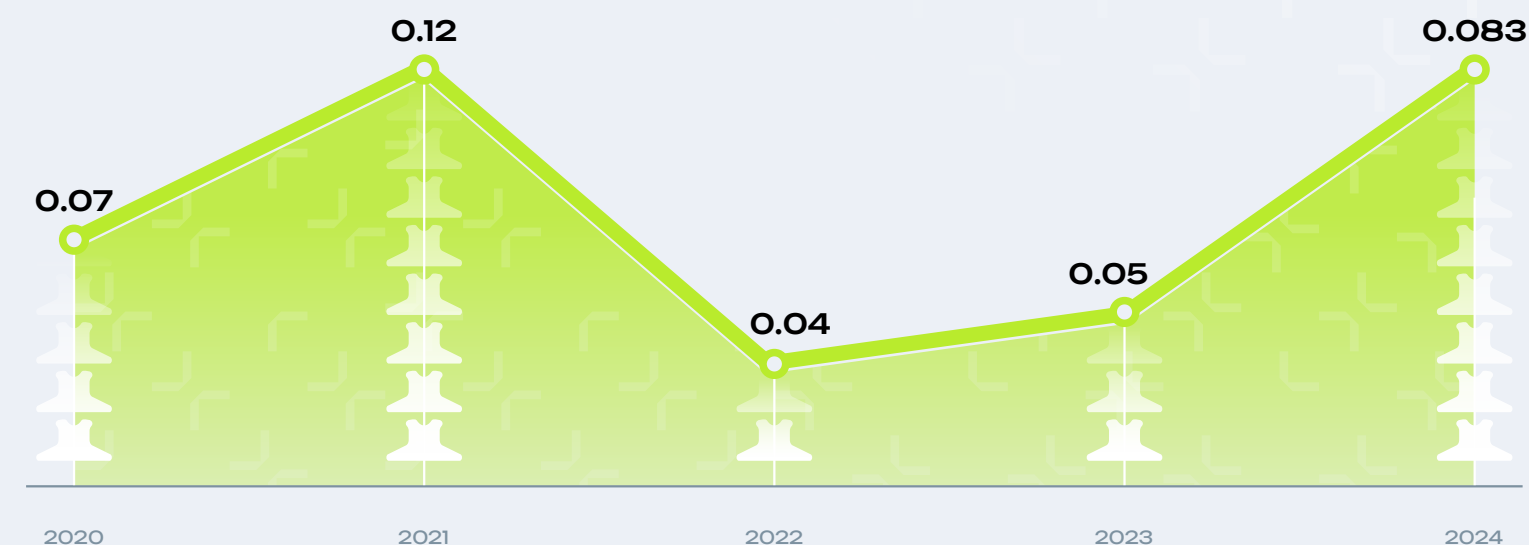
**SAIDI** (System Average Interruption Duration Index) — characterizes the average duration of one system outage per year in minutes.

GRI EU29, SASB IF-EU-550A.2

### SAIDI



### SAIFI



**SAIFI** (System Average Interruption Frequency Index) — characterizes the average frequency of power supply interruptions to consumers.

GRI EU28, SASB IF-EU-550A.2



GRI 201-2

In 2024, 26 technological disruptions occurred due to the effects of natural phenomena (60% of the total number).

Climate change is causing an increasing number of serious and extreme weather events that pose a threat to the reliability of Company network facilities, including strong winds and rains, hail, hurricanes, cyclones, droughts, as well as the risks of fires and floods. Extreme weather conditions and changes in air temperature can lead to system strain, reduced efficiency, and possible disruptions in customer service for KEGOC JSC.

The main unfavorable climatic factors potentially leading to negative impacts are strong winds, lightning surges, formation and discharge of icy-frost deposits on overhead line wires and lightning lines.

The Company creates a Risk Register on an annual basis, which includes, among other things, climatic factors. During its formation, an analysis of potential scenarios that KEGOC JSC may face is carried out, including the variability of weather conditions, as well as an increase in the frequency and intensity of extreme climatic events. The possible consequences of these risks include:

- ◆ SS and PTL equipment failure;
- ◆ reduction in the volume/quality of electricity supplies to consumers;
- ◆ under-discharge of electricity;
- ◆ the occurrence of unforeseen expenses for the restoration of equipment.

KEGOC JSC performs climate risk management based on the Risk Register. One of the risks affecting the reliability of the Company’s network is the risk of “failure of production assets”, which may be caused by natural disasters. To minimize this risk, the Company takes the following measures:

- ◆ training of personnel in emergency recovery operations;
- ◆ ensuring the readiness of vehicles and special equipment for emergency recovery operations;
- ◆ staffing of branches with emergency stock;
- ◆ SS equipment insurance;
- ◆ conducting emergency training;
- ◆ development of proposals for the introduction of innovations to reduce the impact of natural phenomena on the Company’s production assets.

In addition, to ensure the reliability of the network in order to reduce the key risk of failure of production assets in 2024, the Company implemented:

- ◆ replacement of high-voltage inputs of power electrical equipment;
- ◆ technical inspection of SS and PTL equipment with the involvement of expert organizations;
- ◆ technical expertise of SS and PTL equipment with the involvement of expert organizations;
- ◆ modernization and reconstruction of assets;
- ◆ analysis of technological disruptions in electrical networks.

EMERGENCY RESPONSE

Climate change, namely natural factors (floods, hurricanes, earthquakes, epidemics), create the risk of emergency situations. To minimize this risk, the Company conducts emergency response training in accordance with the annual schedule according to approved topics; participates in the annual republican command and staff exercises “Koktem”, “Kys”, “Zher” where measures to eliminate the consequences of natural disasters (floods, hurricanes, earthquakes) are worked out, and also purchases personal protective equipment.

In order to ensure business continuity for the business process of uninterrupted production activities for the elimination of large-scale emergencies, KEGOC JSC has developed accident response plans (ARP) and an action plan for the elimination of emergencies (APEE) specific to the Company’s activities.

ARP establishes the object, scope and sequence of actions in case of an emergency, as well as responsibility for their provision and implementation. ARP testing is conducted in the form of regular fire and emergency training.

The APEE reflects the activities carried out in the event of a threat of occurrence and elimination of the consequences of an emergency, indicating the timing and time of work. The most common type of emergency at the Company’s facilities can be a fire due to non-compliance with fire-fighting measures and the occurrence of emergency situations. APEE also includes measures in case of a threat of terrorist acts that pose a risk of loss of life, significant property damage, or other serious consequences. For timely notification of the Company’s employees in the event of an emergency and its liquidation, Communication and Notification Plans and a Fire Extinguishing Plan, which are part of the APEE, are put into effect.

To check readiness for actions to eliminate possible emergencies, the Company participates in the annual republican command and staff exercises, conducts object training and seismic training in areas with a high risk of earthquakes (South, East, West). These exercises verify the completeness of the development of plans, the coherence of civil protection units, and the effectiveness of forces and means during emergency recovery operations at thermal power plants.

Achieving Strategic goal 1:

- ◆ **Grid Availability** (657 or Availability of the electric grid, measured in % for the reporting year);
- ◆ **AIT** (Average Interruption Time — average interruption time, in minutes).

By the end of 2024, KEGOC JSC planned strategic KPI's have been achieved and exceeded.

Implementation of strategic KPI's in 2024

KPI name	2020 (actual)	2021 (actual)	2022 (actual)	2023 (actual)	2024 (goal)	2024 (actual)
GA, %	the indicators were determined in December 2021		99.99987	99.99988	99.99878	99.99987
AIT, min.			0.682	0.657	6.411	0.671



# INVESTMENT ACTIVITY

TO ENSURE STABLE GROWTH OF THE COUNTRY'S ECONOMY, IT IS NECESSARY TO ACCELERATE THE DEVELOPMENT OF THE ELECTRIC POWER INDUSTRY AS A WHOLE, INCLUDING THE ELECTRIC GRID INFRASTRUCTURE.

The company is actively continuing to implement large-scale investment projects in order to increase efficiency, NPG reliability and network capacity. These projects are being implemented taking into account the creation of conditions for the development of RES (SPP and WPP, characterized by unstable generation), appropriate power grid construction to ensure the power output of large RES facilities.

In addition, the projects have important social significance — additional jobs will be created during the construction and installation work. This, in turn, will have a positive impact on the development of the real sector of the economy, increase employment and welfare of the population, and increase tax deductions to budgets.

In 2024, the Company is implementing the following major investment projects

## 01

### INTEGRATION OF THE ENERGY SYSTEM OF WESTERN KAZAKHSTAN WITH UPS OF KAZAKHSTAN. CONSTRUCTION OF ELECTRIC GRID FACILITIES.

#### The purpose of the project

Construction of the 500 kV overhead line of the Karabatan substation Ulke with a length of 604.3 km to connect the Western Zone with the main part of the UPS of Kazakhstan across the territory of the Republic of Kazakhstan in order to increase the reliability of electricity supply to consumers in the Western Zone and use maneuverable generation in the Western Zone to compensate for power and capacity imbalances. The project is financed from own and borrowed funds.

#### Source of funding

- ◆ The project is financed from own and borrowed funds.
- ◆ On December 3, 2024, 2 loan agreements were signed with DBK (32 billion tenge), the EBRD (up to 133.33 billion tenge and 15 million euros).

#### Project implementation status

- ◆ In February 2024, the RSE Gosexpertiza received a positive conclusion on the feasibility study of the Project.
- ◆ In September 2024, 3 EPC contracts were signed for substation and overhead line for the development of PSA, supply of equipment, materials and construction and installation work.
- ◆ Work has begun on the development of a PSA (substation survey, approval of the overhead line route).

## 02

### STRENGTHENING OF THE ELECTRICAL NETWORK OF THE SOUTHERN UPS ZONE OF THE REPUBLIC OF KAZAKHSTAN.

#### The purpose of the project

Strengthening of the UPS Southern Zone electric power system across the territory of the Republic of Kazakhstan to ensure reliable power supply to consumers in the Southern Zone and strengthen electrical communication between the regions of the Southern Zone.

#### Source of funding

- ◆ The project is financed from own and borrowed funds ("green" bonds).
- ◆ On July 19, 2024, a loan agreement was signed with the Asian Development Bank in the amount of 58.2 billion tenge.

#### Project implementation status

- ◆ A feasibility study has been developed. Contracts have been concluded for 5 facilities (2 overhead lines and 3 substations) for the development of a PSA, the supply of equipment, materials and the implementation of a QMS.
- ◆ The PSD for the 2nd overhead line is being examined by the RSE Gosexpertiza.
- ◆ Positive conclusions of the RSE "Gosexpertiza" were received for substation 500 "Shu" and "Zhambyl".
- ◆ The PSA is undergoing an examination for the substation 500 Shymkent.
- ◆ The equipment has been delivered.

On July 19, 2024, a loan agreement was signed between KEGOC JSC and the Asian Development Bank to finance the project "Strengthening the electric grid of the Southern UPS Zone of Kazakhstan. Construction of electric grid facilities", in the amount of 58.2 billion tenge.

On December 3, 2024, a loan agreement was signed between KEGOC JSC and the EBRD, as well as an agreement to open a credit line with Development Bank of Kazakhstan JSC (DBK) to finance the project "Connecting the energy System of Western Kazakhstan with UPS of Kazakhstan. Construction of electric grid facilities".

- ◆ The amount of the EBRD loan is up to 133.3 billion tenge, as well as an additional loan of up to 15.0 million euros.
- ◆ The amount of the credit line in DBK is 32.0 billion tenge.

When forming a portfolio of investment projects, KEGOC JSC uses a scenario approach based on the development and annual updating of the projected balance of electricity and UPS capacity in the Republic of Kazakhstan. In addition, the risks of climate change are taken into account, namely natural factors (floods, hurricanes, earthquakes, epidemics) that lead to an emergency risk.



In order to ensure the reliability of the power grid and minimize the key risk of failure of production assets in the short term, the Company plans to implement the following investment projects aimed at the development of NPG:

01

RECONSTRUCTION OF 220-500 KV OVERHEAD LINES OF KEGOC JSC BRANCHES, STAGE II

The aim of the project is to increase the reliability of the NPG of the Republic of Kazakhstan through the reconstruction of existing PTLs that have reached their standard service life, as well as overhead lines that will reach their standard service life in the coming years.

The objects of reconstruction are 48 220-500 kV overhead lines, which are on the balance sheet of the branches “Akmola MES”, “Central MES”, “Eastern MES”, “Northern MES” with a total length of 4,236 km. The feasibility study was sent for examination to RSE Gosexpertiza.

02

RECONSTRUCTION OF 220-500 KV OVERHEAD LINES OF KEGOC JSC BRANCHES, STAGE III

The need for NPG reconstruction is due to the following reasons:

- ♦ achieving and exceeding the standard service life of 220-500 kV overhead lines;
- ♦ improving the reliability of electricity supply to consumers, transit of electricity, and output of power plants.

The objects of reconstruction are 44 220-500 kV overhead lines, which are on the balance sheet of the branches “Almaty MES”, “Central MES”, “Southern MES” with a total length of 4,332 km. A feasibility study is being developed.

03

STRENGTHENING THE EXTERNAL POWER SUPPLY SCHEME IN ASTANA. CONSTRUCTION OF ELECTRIC GRID FACILITIES

The aim of the Project is to increase the reliability of Astana’s electricity supply by creating a second city power supply center with 500 kV supply lines in order to cover the growing electricity needs of the region and the possibility of connecting additional RES facilities. A feasibility study is being developed. The project implementation period is 2024-2028.

In addition, in the long term, until 2035, KEGOC JSC will consider supplementing its investment portfolio with the following major NPG development projects:

01

INCREASE THE TRANSIT POTENTIAL AND CAPACITY OF UPS KAZAKHSTAN.

The development of the feasibility Study of the Project is initiated in order to increase the transit potential of the NPG of the Republic of Kazakhstan using innovative technologies, taking into account the implementation of major RES projects, as well as taking into account the possibility of interconnection of the energy systems of the Central Asian and Caucasian countries.

04

STRENGTHENING OF THE WESTERN ENERGY HUB CONSTRUCTION OF 500 KV OVERHEAD LINE SUBSTATION KABATAN — SUBSTATION BEINEU — SUBSTATION MANGYSTAU.

The project is planned to be implemented in order to provide the necessary conditions for the 2nd stage of the Unification of the Western Zone with the UPS of Kazakhstan and the balancing of the RES.

02

CONSTRUCTION OF 500 KV KARAGANDA — ASTANA OVERHEAD LINE AND CONSTRUCTION OF A NEW 500 KV KARAGANDA SUBSTATION.

The implementation of the project, first of all, will improve the reliability of the Karaganda-Temirtau energy hub, which is home to large industrial enterprises in the country and will increase the capacity of the 500 kV network.

05

UNIFICATION OF THE WESTERN ZONE WITH UPS OF THE REPUBLIC OF KAZAKHSTAN. STAGE II.

The project will balance the energy system due to the maneuverability of gas generation in the Western Zone, integrate RES into UPS in the Republic of Kazakhstan, and expand transit potential in the future. This project will make it possible to complete the looping of the power system with high voltage lines.

03

CONSTRUCTION OF 500 KV OVERHEAD LINE SUBSTATION KARAGANDA — SUBSTATION ZHEZKAZGAN — SUBSTATION KYZYLORDA — SUBSTATION SHYMKENT.

The implementation of the project will ensure the delivery of the planned capacity for the construction of the Kyzylorda CCGT with a capacity of 1,000 MW, as well as strengthen the power supply to the Ulytau power plant and ensure the construction of a pipeline in the Ulytau power plant.



# RESEARCH AND DEVELOPMENT ACTIVITIES

The Company's R&D management activities are regulated by relevant internal documents that establish uniform requirements for the organization, planning, accounting, control of execution and acceptance of R&D commissioned by KEGOC JSC. R&D is considered as a process that covers the entire life cycle from defining tasks to evaluating and taking into account the actual effect of using the development results in the Company's practical activities.

Conducting R&D in the Company is aimed at achieving the Company's strategic goals in accordance with the KEGOC JSC Development Plan and KEGOC JSC Innovation and Technology Policy.

The main goals of organizing R&D in a Company are:

- ◆ creation, systematization and development of R&D planning and execution processes, taking into account their priority and relevance for the innovative and technological development of the Company;
- ◆ ensuring effective interaction of processes related to the development and use of scientific and technical products;
- ◆ implementation of R&D results to improve the efficiency and quality of production and business processes;
- ◆ monitoring the achievement of targets.

The main directions of technological development of KEGOC JSC are:

- ◆ innovations;
- ◆ R&D;
- ◆ innovation and inventive activities.



## KEGOC JSC technological development indicators over the past 5 years

	2020	2021	2022	2023	2024
<b>Total costs, million tenge, including for:</b>	<b>1,887.43</b>	<b>236.97</b>	<b>3.72</b>	<b>15.09</b>	<b>56.75</b>
Innovations	1,834.97	215.50	-	-	-
R&D	45.14	19.80	-	-	43.55
Innovation activities	7.32	1.67	3.72	15.09	13.20
Number of employees engaged in research activities, people	26	26	26	26	26

## Implemented projects of technical and economic research (IRE), scientific research (R&D) and development work (R&D)

Nº	Project name	Implementa- tion year
1	R&D on reducing power losses in 500 kV PTL with OPGW	2017–2020
2	R&D "Study of the effectiveness of AVR settings of system power plants to ensure static and dynamic stability of 500-220 kV NPG of the Republic of Kazakhstan"	2018–2022
3	Feasibility study on the development of algorithms and creation of WACS automation based on WAMS synchrophasor measurements	2019–2020
4	R&D on identifying factors and sources of insulation contamination of electrical equipment "Western MES"	2021
5	Feasibility study on the possibility of using energy storage for UPS of the Republic of Kazakhstan	2021
6	Feasibility study on digital substation technologies	2021
7	Feasibility study on the selection of FACTS devices for reactive power compensation in UPS of the Republic of Kazakhstan	2021–2022
8	Feasibility study on the necessity of grounding shielding sheaths of control cables at substations with microprocessor-based relay protection and automation devices	2023–2024



## INNOVATION AND INVENTIVE ACTIVITIES

Innovation and inventive activity (IIA) is carried out in accordance with the “Rules of Organization of Innovation and Inventive activity in KEGOC JSC and its subsidiary organization.”

The main advantage of IIA is the opportunity for each employee to participate in this process, which in turn makes it possible to minimize the time from birth to the implementation of an idea and reach the maximum number of employees of the Company.

The IIA defines ideas that can be applied in other departments of the Company and provides conditions for scaling the offer. The main objectives of the IIA organization are:

- ♦ activation of IIA and further development of mass technical creativity of the Company’s employees and UP to;
- ♦ increasing the interest of the Company’s employees and employees in the results of their work by providing moral and material incentives to the IIA.

In 2024, 16 applications were recognized as innovation proposals and remuneration was paid for innovation proposals in the amount of KZT 13,199 million.

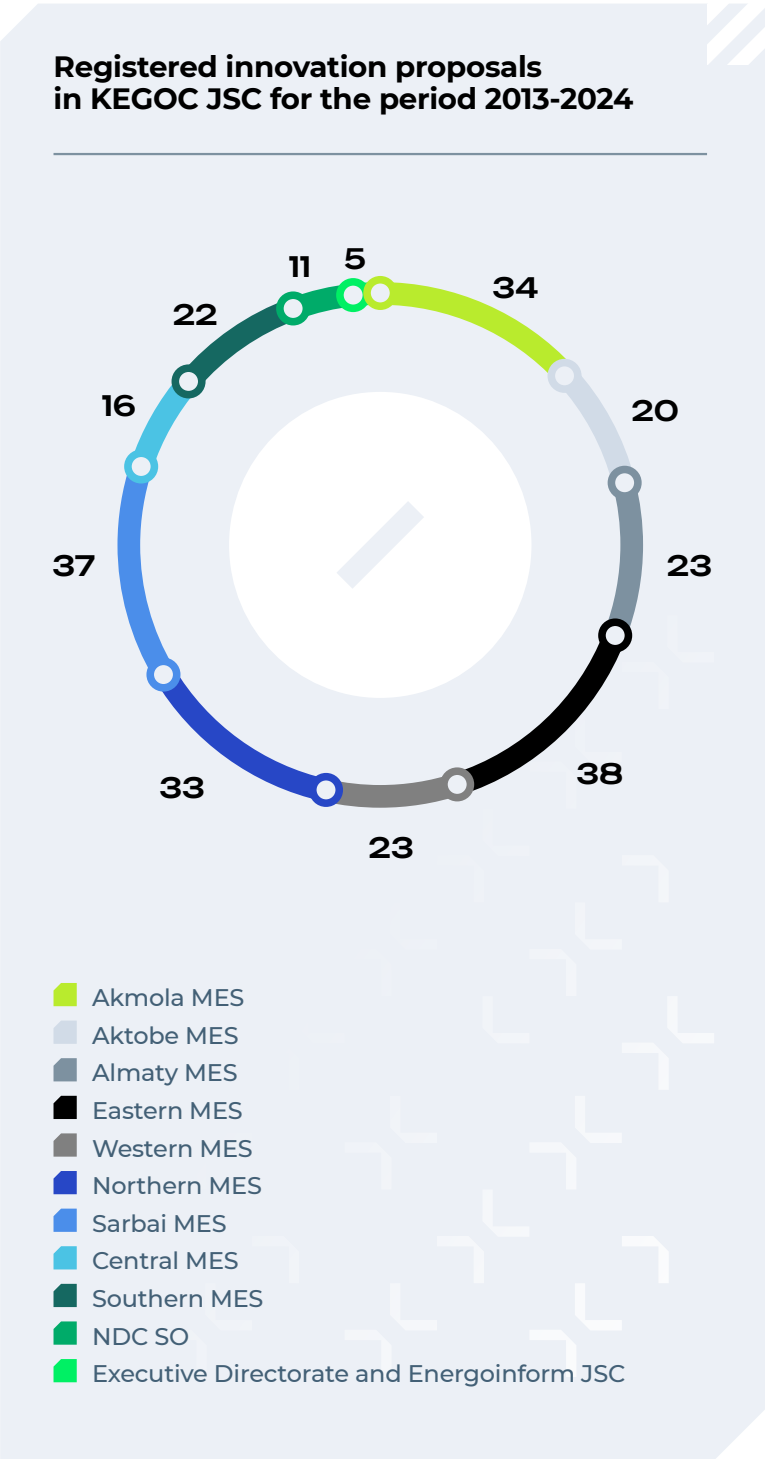
13.199

million tenge



rewards paid for innovation proposals in 2024

In total, 278 innovation proposals were registered at KEGOC JSC during the period 2013-2024.



## INNOVATIONS

According to the global trend, KEGOC JSC continues to work in the field of modern innovative and digital technologies, based on the introduction of various elements of intelligent management of network facilities (measurement, monitoring, control and management systems), on the basis of which a new generation of electric networks, the so-called “Smart Grid”, can be created.

Within the framework of these global trends, the “Concept for the development of the Electric Power industry of the Republic of Kazakhstan for 2023-2029” has established an indicator for the creation of an “Intelligent Energy System”. This system will provide data collection and processing, decentralized management of energy systems, integration of distributed generation, including RES, decision-making based on synchrophasic measurements and the introduction of FACTS devices. To implement the concept, the Ministry of Energy of the Republic of Kazakhstan has developed a technology architecture for all structures of the country’s fuel and energy complex (FEC).

### SASB IF-EU-420A.2

The Company has implemented information systems such as SCADA, AFPC, TsSPA, WAMC, WACS, ASCAPC, SMiU, FOCL, Electricity Market Balancing System, and BIS. Among these, the 100% implementation of ASCAPC technology is particularly noteworthy.

As part of the implementation of the Smart Grid concept, KEGOC JSC has identified three main areas of digitalization of production processes that correspond to the Architecture of Digital information systems FEC (Fig. 17):

- 1. Production Operations Management (MOM)** is aimed at improving the reliability and efficiency of production operations, minimizing downtime and optimizing resources.
- 2. Production Management Systems (MES)** provide real-time monitoring, accounting, and management of production processes, including power system management and process monitoring.
- 3. Automated control systems of technological processes (ACSTP)** automation and control of technological processes, including substation systems, relay protection, diagnostics and emergency automation.

In the three above-mentioned areas, projects are currently being implemented to modernize the SCADA/EMS system and introduce a monitoring system based on synchronized WAMS technologies (Stage 2), which will improve the efficiency of dispatch control and the observability of UPS operating modes in the Republic of Kazakhstan, as well as ensure monitoring of stability reserves and assessment of the UPS status in the Republic of Kazakhstan.

In 2024, the Pilot Project “Introduction of Electricity Storage Systems in UPS RK” (Pilot Project) continued to be implemented to study the impact of electricity storage systems on UPS regulation when integrating RES with China Power International Development Limited, China Power International Holding Limited and the Association of Renewable Energy of Kazakhstan. According to the Pilot project, it is planned to install an electricity storage system with a capacity of 3.45 MW and a capacity of 7.72 MWh.

Also in 2024, work on the project “Development of algorithms in the Centralized Automatic frequency and power control system for managing electricity storage systems” was completed. The aim of the project is to increase the reliability of Kazakhstan’s NPG while integrating RES through the introduction of electricity storage systems (ESS). As part of the project, algorithms for automatic frequency and power control (AFPC) were developed to control the Electric energy storage system as a separate type of facility, taking into account their features and technical limitations.



Architecture of digital information systems FEC

4

1. ECONOMICS AND PLANNING

Investment Projects  
IVMS

Operational Efficiency  
EPM

Tariffs  
TM

Modernization  
Products  
PM

Budgeting  
MA

Risks, Audit and Legal  
Management  
RM/LG

2. MARKETING  
AND PROCUREMENT

Operating and  
Suppliers  
CRM/SRM

Billion  
BMS

Procurement  
PTP

3. FINANCE

Accounting  
AMS

TAX

Payments  
TRM

4. PERSONAL AND TRAINING

HR Personnel

LMS Learning and  
Development

PPS Payroll

5. BI-ANALYTICS

Forecasting and  
Modeling

Data Analytics and  
Reports

DS/ML Data Analysis

3

6. DOCUMENTS

Knowledge  
Management  
KV

DMS  
Documents and  
archives

7. PRODUCTION OPERATIONS MANAGEMENT — MOM

EAM/MDM  
Asset Management

CIM/BIM/GIS  
Technological Modeling

DRMS  
Demand Management

PPE  
Workwear and PPE

APM  
Equipment Reliability  
and Audit

HSE  
Occupational Safety,  
Entrance, Strategy and  
Safety Engineering

FSM  
Client Service

WMS  
Supply and Warehouse

2

8. PRODUCTION CONTROL SYSTEMS (MES)

Monitoring Systems

Operating Systems

Metering Systems

Software Systems

1

9. AUTOMATION PROCESS CONTROL SYSTEMS (APCS)

Substation  
Automation System

Relay protection & Automation Systems

Diagnostic Systems

Control Systems

0

10. TECHNOLOGICAL OBJECTS

Substation

Distribution Points

Overhead  
Transmission Lines

Fiber Optic  
Communication Lines

Buildings & Structures

Vehicles

- Corporate systems
- Production systems
- MES systems
- APSC systems
- Production object



Energy  
Generation

Energy  
Transmis-  
sion

Energy  
Distribu-  
tion

Energy  
consump-  
tion

11. INFORMATION TECHNOLOGY (IT)

AD/SSO  
Users and initial Access

IT Assets and HAM

MS  
Corporate Mail

ITIL Help Desk

12. INFORMATION SECURITY (ICS)

DLP  
Preventing leaks

IPS  
Intrusion Prevention

SIEM  
Information Security  
Management

13. TECHNOLOGICAL PLATFORM

IT-Systems Monitoring

Kafka  
Real-time Data  
collection

Kubernetes  
Virtualization and  
containers

Hadoop  
Data Storage and  
processing

CPE



# ARTIFICIAL INTELLIGENCE TECHNOLOGIES

Artificial Intelligence (AI) technologies are opening new opportunities for the energy industry, becoming a key element in the digital transformation of power systems. AI is an effective tool for solving urgent tasks such as RES integration, increasing complexity of energy system management processes and the need to improve the reliability of energy supply.

In line with global trends in the field of digitalization, the “Concept for the development of artificial Intelligence for 2024-2029” provides target indicators for increasing the number of products using AI. It provides for the implementation of AI projects, as well as support for scientific research through grant and targeted program financing.

According to the KEGOC JSC Development Plan (Strategy) for 2023-2032, the Company will continue to integrate AI technologies within the framework of building an intelligent energy system in Kazakhstan. In particular, AI will be used for the following tasks:

1. forecasting of electricity generation and consumption;
2. forecasting the technological consumption of electricity during transmission over NPG, followed by an analysis of the actual (reportable) losses of electricity by components;
3. forecasting the technical condition of production assets, detecting defects;
4. forecasting technological disruptions.

## Strategic initiatives/areas of AI application



In 2024, in order to implement the KEGOC JSC Development Plan (Strategy), measures were launched to integrate AI technologies as part of the SCADA system modernization project. These works are aimed at:

- ◆ forecasting the production and consumption of electricity;
- ◆ forecasting of technological power consumption.

One of the key areas of 2024 was cooperation with Assystem SA on the implementation of the pilot project “Digital twin of a substation transformer”. The digital transformer model will provide real-time monitoring of the condition, identify potential malfunctions and improve the accuracy of forecasts.



01

02

03

04

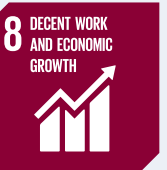
05

06

07

# SUSTAINABLE DEVELOPMENT

# 4



41	Sustainable development management
48	Human resources policy
64	Environmental protection
72	Climate change
84	Occupational health and safety
88	Procurement Practices



# SUSTAINABLE DEVELOPMENT MANAGEMENT

## KEY EVENTS IN THE FIELD OF SUSTAINABLE DEVELOPMENT

By the decision of the Board of Directors of KEGOC JSC dated May 28, 2024, the updated KEGOC JSC Development Plan (Strategy) for 2023-2032 was approved.

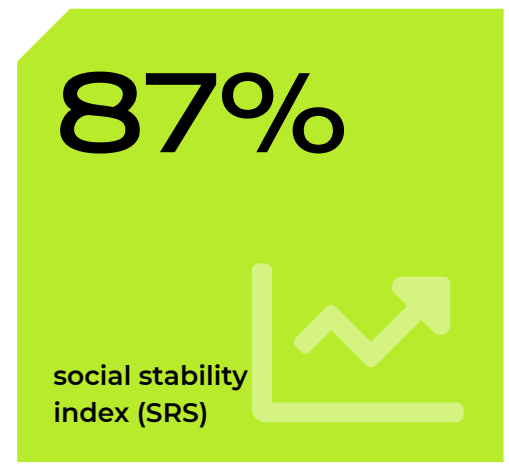
On December 26, 2024, the Management Board approved the “KEGOC JSC Climate program for 2025-2060” in accordance with the recommendations of the TCFD (Task Force on Climate-related Financial Disclosures).

During 2024, KEGOC JSC worked to develop a Human rights policy within the framework of strengthening corporate responsibility and compliance with international standards in the field of human rights and freedoms. On March 31, 2025, the KEGOC JSC Management Board officially approved the Human rights policy.

KEGOC JSC is recognized as the leader in social stability among Samruk-Kazyna JSC portfolio companies. The level of the social stability index (SRS) is 87%.

KEGOC JSC took the first place among the portfolio companies of Samruk-Kazyna JSC for achievements in the field of industrial safety by the end of 2023.

KEGOC JSC has made significant progress in the field of sustainable development, which has been confirmed by the independent rating agency S&P Global. As of January 31, 2025, the Company received an ESG rating of S&P Global CSA Score at 55/100, which is 4 points higher than the result of 2023 (51 points). The level of information disclosure was recognized as “Very High”, reflecting the transparency and completeness of KEGOC JSC’s ESG practices.





## SUSTAINABLE DEVELOPMENT MANAGEMENT STRUCTURE

KEGOC JSC is aware of the importance of its impact on the economy, the environment and society and, striving to increase long-term value, ensures that its activities comply with the principles of sustainable development by aligning its environmental (E), social (S) and management (G) goals.

KEGOC JSC carries out systematic work to improve ESG principles, including corporate governance, with a focus on ensuring environmental and social responsibility, effective exercise of shareholders' rights, fair treatment of shareholders, balanced dividend policy, efficiency of the Board of Directors and the Management Board of KEGOC JSC, the system of interaction with stakeholders, proper disclosure of information about the Company to stakeholders and improvement of risk management and internal control systems.

### Principles of sustainable development of KEGOC JSC

#### 1. Green infrastructure development

KEGOC JSC is actively investing in the construction and modernization of power grids, contributing to the integration of electricity and improving the energy efficiency of the system.

#### 2. Priority of occupational safety and health

The Company continues to implement high safety standards and is committed to the Vision zero concept, improving working conditions and minimizing workplace risks.

#### 3. Responsible supply chain

KEGOC JSC cooperates with suppliers who share the principles of sustainability, thereby contributing to the development of sustainable business practices at the industry level.

#### 4. Environmental management

KEGOC JSC implements resource management and waste management control systems, strengthening its position in the field of environmental responsibility.

#### 5. Focus on employee well-being

Special attention is paid to creating a comfortable and safe working environment, implementing social support programs and ensuring a high level of staff engagement.

#### 6. Investments in human capital

KEGOC JSC operates a continuous training and professional development system that promotes the growth of competencies and career opportunities for employees.

The Company consistently improves its management system in the field of sustainable development, integrating ESG principles at all levels of corporate governance. Sustainable development issues are under the constant control of the Board of Directors, which approves key policies, monitors the implementation of initiatives and ensures strategic compliance of the Company's activities with the principles of sustainable development:

- ◆ forms strategic guidelines and priorities of the Company in the field of sustainable development;
- ◆ reviews and approves reports on ESG areas;
- ◆ oversees the implementation of sustainability principles in operational activities;
- ◆ manages risks in the field of sustainable development, including climate risks.

The Board of Directors is provided with reports on the results of its activities in the field of sustainable development on a regular basis (annually and quarterly).

In addition, to organize and ensure work on management issues in the field of sustainable development, the development, implementation, and operation of the KEGOC JSC integrated management system and the continuous improvement of the effectiveness of management systems, the Company's Management Board has an advisory body, the Coordinating council for sustainable development and the IMS, headed by the Chairman of the Management Board of KEGOC JSC.

The Coordinating Council includes all managing directors and heads of subsidiaries.

### The main tasks of the Coordinating Council on Sustainable Development are:

- ◆ ensuring the promotion and observance of principles in the field of sustainable development;
- ◆ ensuring the implementation of planning, determining responsibility for monitoring management activities in the field of sustainable development, as well as determining the content of information on sustainable development activities provided to stakeholders.

### KEGOC JSC sustainable development management structure





## INTERACTION WITH STAKEHOLDERS

### GRI 2-29

KEGOC JSC considers interaction with stakeholders as one of the important components of its activities in the field of sustainable development. The Company recognizes that an open and systematic dialogue with government officials, investors, employees, business partners, local communities and other stakeholders plays an essential role in shaping the Company's positive image as an effective organization developing according to established strategic goals.

The Management Board of KEGOC JSC is responsible for implementing mechanisms for interaction with stakeholders in accordance with the Company's corporate documents. Interaction with stakeholders is carried out on the basis of internal documents, including the Communication Program, the Plan of Communication with Stakeholders and the KEGOC JSC Stakeholder Map.

According to the Communication Program, the Company has identified key principles for itself when interacting with KEGOC JSC stakeholders:

- ◆ **Openness and accessibility** — The Company strives for a high level of awareness about its activities and role in the electric power industry and its development directions.
- ◆ **Regularity and timeliness** — The Company regularly reports on results and key changes in its operations.
- ◆ **Awareness and support** — The Company conducts an open dialogue with key stakeholders, ensuring their participation in the discussion of significant topics.
- ◆ **Respect and consideration of interests** — The Company takes into account the opinions, expectations and preferences of stakeholders when making decisions.

### To achieve the Company's strategic goals, it is important:

- ◆ the existence of an effectively functioning policy of interaction with stakeholders;
- ◆ achieving openness and mutually beneficial cooperation with all stakeholders;
- ◆ achieving an understanding by stakeholders of the measures taken by the Company to maximize the reduction and elimination of all real risks in the implementation of the Development Strategy;
- ◆ creating a reliable source of information about the Company's activities for stakeholders and ensuring that reliable information about KEGOC JSC's activities is promptly communicated to target groups of stakeholders.

KEGOC JSC identified groups of stakeholders jointly with all structural divisions of the Company, as well as the degree of their influence on achieving the goals of the Development Strategy and the exposure of the Company's activities to them on a five-point scale. At the same time, when summarizing the analysis, special attention was paid to the opinions of "experts", that is, structural units that directly interact with specific groups of stakeholders.

KEGOC JSC maintains a constant open dialogue with these groups and regularly discloses information related to KEGOC JSC's activities, including in the field of sustainable development.

When implementing the planned activities, the Company organizes interaction with local communities within the framework of the environmental impact assessment (EIA) procedure in accordance with the requirements of the legislation of the Republic of Kazakhstan. Interaction begins with preliminary informing of the population

through local media and information stands about the planned project and upcoming public hearings. At the stage of documentation preparation, open hearings are held with the participation of representatives of local communities, government agencies and NGOs, where information is provided on the project, potential environmental and social impacts, as well as proposed measures to reduce them. All comments and suggestions received during the discussions are recorded and taken into account when finalizing the project.

The Company provides feedback on the results of reviewing comments, and, if necessary, conducts repeated consultations with the public. During the project implementation period, a constant dialogue is maintained with the communities, especially on issues of impact monitoring and risk management. Consultations are conducted both as planned and at the request of interested parties, as well as in case of significant changes in the project or the occurrence of environmental and social incidents.

Stakeholder map of KEGOC JSC





RESULTS OF STAKEHOLDER ENGAGEMENT IN 2024

GRI 2-29, 2-26

SHAREHOLDERS

Objectives of Engagement

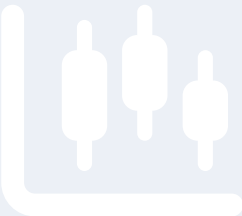
The Company's interaction with shareholders is aimed at protecting and respecting their rights and legitimate interests, as set out in KEGOC JSC's Corporate Governance Code and Charter.

Engagement Channels

- ◆ Annual reports;
- ◆ General Meetings of Shareholders;
- ◆ National and regional media and the Company's website;
- ◆ Responses to enquiries;
- ◆ Meetings with shareholders and investors, round tables, presentations, roadshows.

2024 Results

- ◆ Issuer Days were held at AIX and KASE trading platforms.
- ◆ Two General Meetings of Shareholders were held in 2024.



FINANCING INSTITUTIONS

Objectives of Engagement

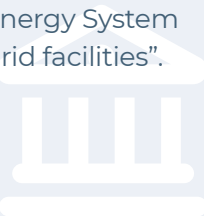
The Company meets its financial obligations to investors in a timely and full manner, aiming for long-term cooperation based on mutual trust.

Engagement Channels

- ◆ Annual reports;
- ◆ Round tables, summits;
- ◆ Company's website;
- ◆ Information on KASE.

2024 Results

- ◆ KEGOC JSC and the Asian Development Bank (ADB) signed a financing agreement worth KZT 58.2 billion to implement the project for strengthening the electrical grid in the Southern Zone of Kazakhstan's Unified Power System (UPS).
- ◆ A loan agreement was signed between KEGOC JSC and the European Bank for Reconstruction and Development (EBRD), and a credit line agreement was signed between KEGOC JSC and the Development Bank of Kazakhstan. These agreements are aimed at implementing the project "Integration of the Western Kazakhstan Energy System with the UPS of Kazakhstan. Construction of power grid facilities".



GOVERNMENT AND REGULATORY AUTHORITIES

Objectives of Engagement

As a strategic entity of the Republic of Kazakhstan and a natural monopoly, KEGOC JSC acknowledges its responsibility to the state and is committed to fulfilling legal and ethical obligations and complying with regulatory requirements.

Engagement Channels

- ◆ Annual reports;
- ◆ Corporate events;
- ◆ National and regional media and the Company's website;
- ◆ In-person meetings with Company management;
- ◆ Participation in summits, interdepartmental and intergovernmental advisory bodies.

2024 Results

- ◆ Environmental permits were agreed and obtained for the construction phase of the project "Strengthening the Electrical Grid in the Southern Zone of Kazakhstan's UPS".
- ◆ The Committee for Regulation of Natural Monopolies of the Ministry of National Economy of the Republic of Kazakhstan approved an adjustment of the tariff estimates for KEGOC JSC's regulated services for the 3rd regulatory period (Order No. 82-OD dated 11.09.2024).





RESULTS OF STAKEHOLDER ENGAGEMENT IN 2024

GRI 2-29, 2-26

PROFESSIONAL AND EXPERT ORGANIZATIONS,  
PUBLIC ASSOCIATIONS, MEDIA

Objectives of Engagement

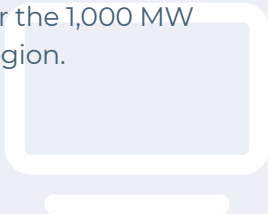
KEGOC JSC is a member and participant of international, regional, and national industry organizations, with a focus on deeper integration mechanisms and a coordinated electricity development strategy in Kazakhstan and beyond. The Company builds reputational capital and a positive media image.

Engagement Channels

- ◆ Annual reports;
- ◆ Company website;
- ◆ Press releases, press conferences and briefings;
- ◆ Press tours;
- ◆ Meetings with partners and investors;
- ◆ Engagement in expert and professional communities;
- ◆ Social media.

2024 Results

- ◆ The Company organized a series of events for media outlets: briefings, interviews, and Issuer Day at KASE, where investors, professional securities market participants, and media representatives were informed about the Company's performance, strategic plans, and investment projects.
- ◆ Collaboration was carried out with major partners in RES projects (CPIH, ACWA Power, Total, Hevel). In 2024, an Investment Agreement and Power Purchase Agreement were signed for the 1,000 MW Masdar wind power plant project in Zhambyl Region.



SUPPLIERS

Objectives of Engagement

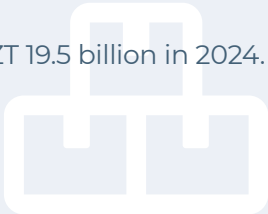
When procuring goods, works, and services, the Company adheres to principles of transparency, quality, equal access, fair competition, accountability, and minimizing intermediaries.

Engagement Channels

- ◆ Kazakh business media;
- ◆ Company website;
- ◆ Annual reports;
- ◆ Responses to specific enquiries;
- ◆ Presentations, conferences, business meetings;
- ◆ Official Zakup.sk.kz portal.

2024 Results

- ◆ KEGOC JSC and China Energy International Group signed a memorandum of cooperation in power grid development and discussed future collaboration.
- ◆ KEGOC JSC hosted a meeting with subsoil users on ensuring reliable power supply in the western power hub; during public hearings, reports were presented on the execution of the approved tariff estimate, the approved investment programme, and compliance with service quality and reliability indicators.
- ◆ KEGOC JSC signed offtake contracts totalling KZT 19.5 billion in 2024.



CONSUMERS

Objectives of Engagement

The Company follows a customer-centric approach and has established a mechanism for identifying and meeting consumer needs.

Engagement Channels

- ◆ Company website;
- ◆ Annual reports;
- ◆ Responses to specific enquiries;
- ◆ Presentations, conferences, business meetings;
- ◆ Customer satisfaction surveys.

2024 Results

- ◆ As part of the project “Integration of the Western Kazakhstan Energy System with the UPS of Kazakhstan”, funded by EBRD replacement funds, Open House events were held in all regions affected by the project, including meetings with local residents and regional NGOs.
- ◆ Customer satisfaction level — 95%.





RESULTS OF STAKEHOLDER ENGAGEMENT IN 2024

GRI 2-29, 2-26

EMPLOYEES

Objectives of Engagement

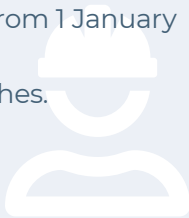
The Company respects and values its employees, considers their needs and interests, and strives to ensure safe working conditions, decent wages and benefits, as well as professional training and development.

Engagement Channels

- ◆ Company website;
- ◆ Internal portal;
- ◆ Corporate publications (KEGOC AQPARAT newspaper, corporate news digest, etc.);
- ◆ Information boards;
- ◆ Management town halls, staff meetings, meetings with talent pool members;
- ◆ Surveys;
- ◆ Corporate events;
- ◆ National and regional media;
- ◆ Ombudsperson Institute.

2024 Results

- ◆ Annual meetings between the Board of Directors and management of KEGOC JSC and talent pool members were held.
- ◆ Social stability level within the Company — 87%.
- ◆ The “Online KEGOC” community was launched on WhatsApp to strengthen internal communication, including regular HR news updates and course distribution.
- ◆ In 2024, wages and tariff rates were increased by 15% from 1 January to enhance pay competitiveness.
- ◆ The Ombudsperson held meetings in nine MES branches.



SUBSIDIARIES

Objectives of Engagement

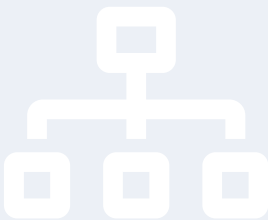
The Company strives for balanced development of its subsidiaries, supported by effective corporate governance mechanisms.

Engagement Channels

- ◆ Meetings with the management and staff of subsidiaries;
- ◆ Public hearings;
- ◆ In-person and online conferences;
- ◆ Corporate events.

2024 Results

- ◆ Company representatives participated in Board of Directors meetings of Energoinform JSC and Batys Transit JSC.
- ◆ The Ombudsperson held meetings in nine branches of the Company.



NEIGHBOURING POWER SYSTEMS

Objectives of Engagement

To ensure parallel operation of Kazakhstan’s power system with those of neighbouring countries, the Company fosters mutually beneficial and effective cooperation with the Russian Federation and Central Asian states.

Engagement Channels

- ◆ Company website;
- ◆ Board meeting notifications;
- ◆ Updates on negotiations;
- ◆ Participation in the Coordination Electric Power Council of Central Asia (CEC CA), the CIS Electric Power Council, and other international organizations;
- ◆ Approval of regulatory and technical documents for coordinated parallel operation.

2024 Results

- ◆ KEGOC JSC participated in a meeting of energy system heads from Kazakhstan, Kyrgyzstan, Tajikistan, Uzbekistan, and Russia on national grid development.
- ◆ KEGOC JSC took part in the meeting of the Coordination Electric Power Council.





PARTNERSHIP

GRI 2-28

KEGOC JSC is a member and participant of several industry associations and the National Chamber of Entrepreneurs of the Republic of Kazakhstan “Atameken” (NCE “Atameken”):



**Associations of legal entities ‘Kazakhstan Electric Power Association’** (KEPA ALE, [www.kea.kz](http://www.kea.kz)), the main tasks of which are:

- ◆ providing support to all organizations whose activities are directly or otherwise related to the electric power industry;
- ◆ participation in the development of government programs, laws and regulations related to the electric power industry;
- ◆ support and protection of the positions of its members in matters where the interests of the industry depend on decisions of the Government, judicial and other bodies.



**Associations of legal entities ‘Kazakhstan Association of Organizations of the oil and gas and energy complex ‘KAZENERGY’** (‘KazEnergy’ ALE, [www.kazenergy.com](http://www.kazenergy.com)) the main objectives of which are:

- ◆ protection of the rights and interests of its members in state bodies, harmonization of the legislative framework;
- ◆ creation of a unified information field for suBGPiface users, electricity producers, transporters and consumers of energy sector products and services;
- ◆ development and support of intra-industry cooperation and entrepreneurship projects at the local, regional and international levels;
- ◆ spreading the positive image of KazEnergy, its members and the industry as a whole at the regional and global levels;
- ◆ stimulating the economic, social, environmental, scientific and technical activity of the Kazakh society.



**NCE ‘Atameken’** ([www.atameken.kz](http://www.atameken.kz)), the main task of which is to protect the rights and interests of business, and to ensure the broad coverage and involvement of all entrepreneurs in the process of forming legislative and other regulatory rules of business.



**Associations for the Development of Competition and Commodity Markets** ([www.ark.org.kz](http://www.ark.org.kz)) the main task of which is to represent and protect common interests in government agencies, government structures, international and public organizations on the development of competition and commodity markets, initiate and promote necessary changes to antimonopoly legislation in the interests of its members, participate in the development of draft regulatory legal acts, develop international non-governmental contacts for the exchange of experience, conduct seminars, conferences, round tables and other events, promotion of competition and entrepreneurship, prevention of violations of antimonopoly legislation.

In addition, KEGOC JSC, in order to contribute to the creation of an efficient electric power market with neighboring countries and the development of international cooperation, constantly participates in the work of such international industry organizations as:

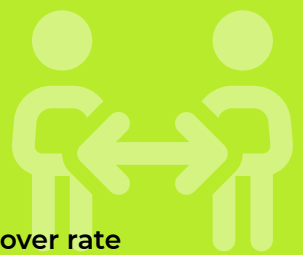
- ◆ the CIS Electric Power Council;
- ◆ International Council for Large High Voltage Electrical Systems (Conseil International des Grands Réseaux Électriques — CIGRE);
- ◆ Eurasian Economic Commission (Republic of Armenia, Republic of Belarus, Republic of Kazakhstan, Russian Federation, Kyrgyz Republic);
- ◆ World Energy Council;
- ◆ Coordinating Electric Power Council of Central Asia (CEPC CA).

# HUMAN RESOURCES POLICY

GRI 2-12, 2-13

## KEY INDICATORS FOR 2024

6.21%



Staff turnover rate

15%



Salaries/tariff rates increased by 15% starting from 1 January 2024

87%



Growth of the social stability index (SRS)

Financial assistance provided to employees affected by floods.

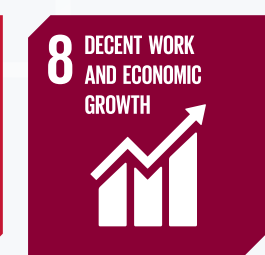


The HR Policy of KEGOC JSC is a strategic document in the field of human resource management aimed at meeting the Company's need for qualified, competent, and motivated personnel, as well as creating the necessary working conditions and a favorable environment for employees.

## KEY PERSONNEL MANAGEMENT DOCUMENTS

- ◆ KEGOC JSC Development Plan (Strategy) for 2023–2032
- ◆ Code of Conduct (Business Ethics)
- ◆ KEGOC JSC Human resources policy
- ◆ Standard for training and personnel development
- ◆ Rules for Recruitment and Selection
- ◆ Rules for Employee Performance Evaluation
- ◆ Rules for Talent Management
- ◆ Rules for Remuneration and Incentives
- ◆ Rules for Providing Social Support to Employees

## CONTRIBUTION TO THE UN SDGS





Effective human resource management ensures optimal resource allocation, a fair labor incentive system, transparency in employment processes, career growth, and professional development of employees.

Accordingly, KEGOC JSC defines its employees as the central priority of the Human Resources Policy and considers the development of human capital as a key factor in enhancing the Company’s efficiency and competitiveness.

Key areas of the HR Policy include:

- ♦ training and development;
- ♦ performance evaluation;
- ♦ remuneration;
- ♦ development of industrial relations;
- ♦ social support;
- ♦ development of corporate culture;
- ♦ improvement of HR-processes.

Issues of social well-being in teams are under the control of the Company's top management.

In 2024, the Company continued to develop industrial relations to maintain favorable working conditions. In accordance with the Action Plan to improve social and living conditions at production sites, 572 violations were scheduled for rectification. As of the end of 2024, 510 nonconformities (89%) were resolved.

On an annual basis, the Company conducts assessments of employee engagement indices (calculated based on survey and online questionnaire results among administrative staff) and the Social Stability Score (SRS) one of the key indicators of KEGOC JSC’s Human Resources Policy, measured among production personnel (PP). The study is carried out through an online survey of production staff, providing a comprehensive overview of the workforce’s social well-being. In the reporting year, 910 employees participated in the survey, representing 24% of the total headcount.

The main purpose of the SRS survey is to diagnose problematic areas in labor relations, enabling not only corrective but also preventive measures. The overall SRS value consists of three indices:

1. Engagement index measures the following parameters:

- ♦ employee satisfaction with the material and technical infrastructure necessary for high-quality and comfortable job performance;
- ♦ satisfaction with workload and occupational safety;
- ♦ satisfaction with the social benefits package;
- ♦ employee loyalty to the company;
- ♦ development and career opportunities (training and meritocracy);
- ♦ fairness of remuneration in relation to job responsibilities;
- ♦ communication: task setting, employee feedback inclusion in decision-making.

2. Social well-being index provides:

- ♦ an assessment of well-being in both static and dynamic terms;
- ♦ an assessment of employees’ health and their participation in social life;
- ♦ an assessment of financial well-being.

3. tranquility index reflects:

- ♦ evaluation of the social climate in the workplace;
- ♦ evaluation of protection of labor rights;
- ♦ assessment of conflict levels in the team;
- ♦ attitude towards protest as a method of resolving labor issues;
- ♦ evaluation of the likelihood of protests and any prior experience of participation.

As of the end of 2024, the Social stability score stood at 87%, marking a 1 percentage point increase from the previous year. The social tranquility index was 96%, the social well-being index — 76%, and the employee engagement index — 87%.



This year, the Social stability score reached the “Challenge” level, exceeding both the threshold and target values, which had been set at 83% and 86%, respectively.

Overall, the high performance indicators reflect a favorable social environment and the success of the Company’s social policy.



SRS Index

Index name	2020	2021	2022	2023	2024
SRS index	91	85	86	86	87
% of employees who participated in the survey	15.8	16.6	32.9	58.3	24.1

PERSONNEL STRUCTURE

ONE OF THE GOALS OF THE HR POLICY IS PROACTIVE HUMAN RESOURCE PLANNING TO ENSURE EFFECTIVE PORTFOLIO MANAGEMENT. BASED ON THE ANALYSIS OF HR METRICS, RESEARCH RESULTS, NEEDS ASSESSMENT, THE INVESTMENT PROGRAM, AND OTHER FACTORS, PERSONNEL NUMBERS AND EXPENSES ARE PLANNED FOR SHORT-TERM AND MEDIUM-TERM PERIODS.

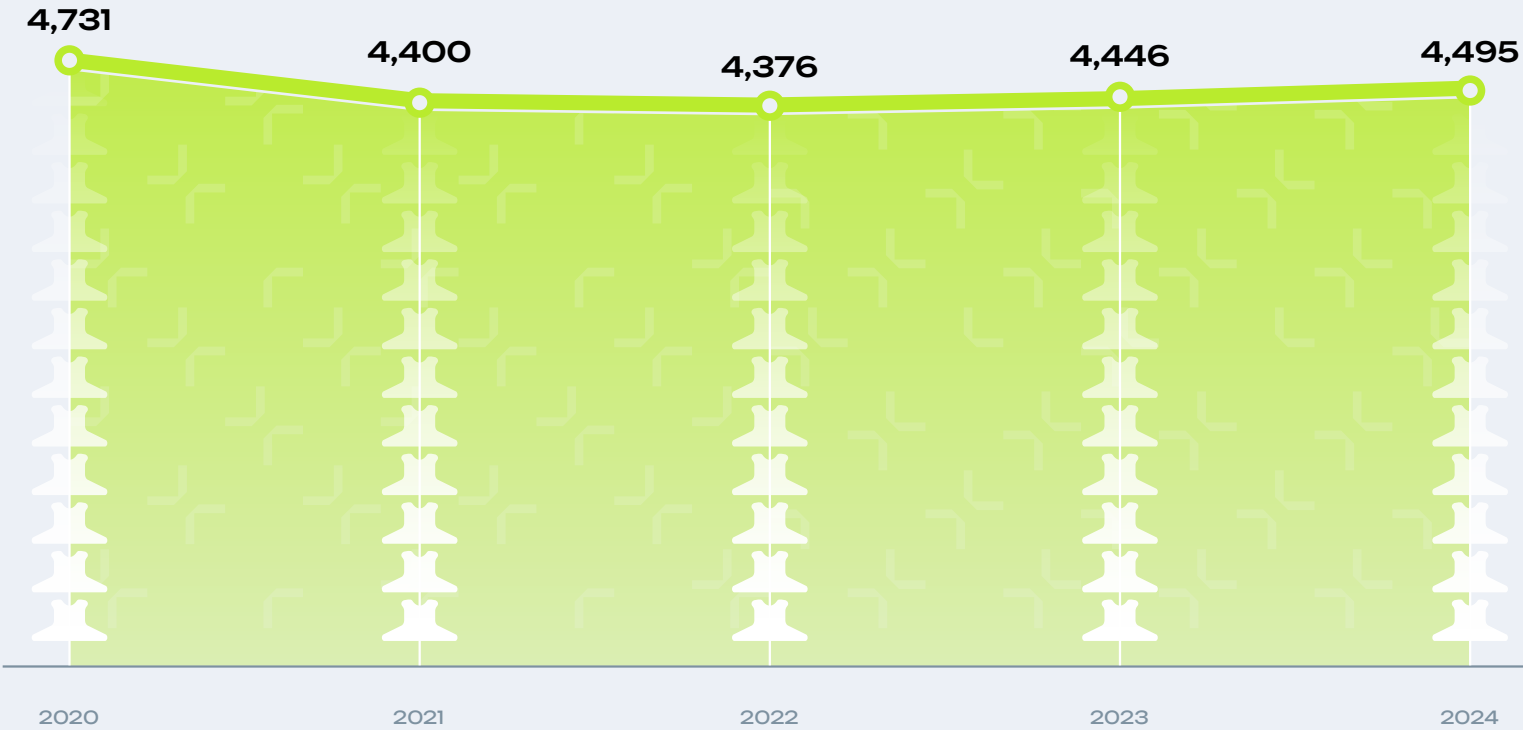
GRI 2-7, 2-8

The total headcount of the Company (including subsidiaries) as of 31 December 2024 was 4,495 employees, with an additional 258 employees engaged fthrough outstaffing.

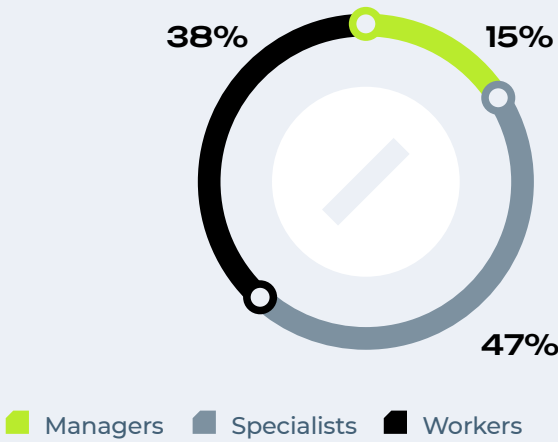
4,495  
persons

total headcount of the  
Company in 2024

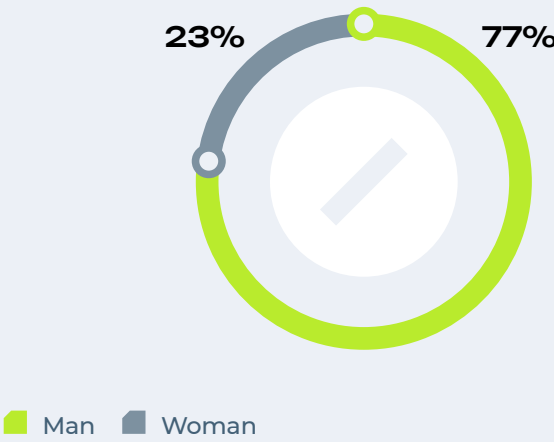
Structure of KEGOC JSC employees, persons



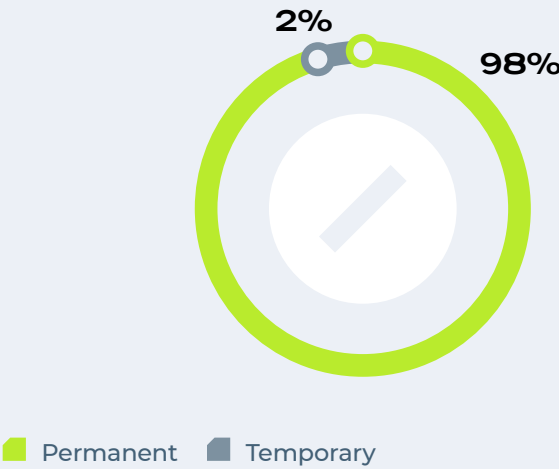
Structure of employees  
by category, %



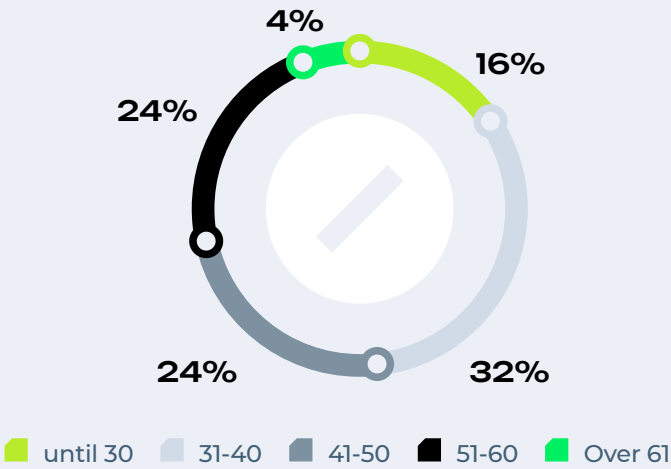
Employee structure  
by gender, %



Structure of employees  
by type of employment, %

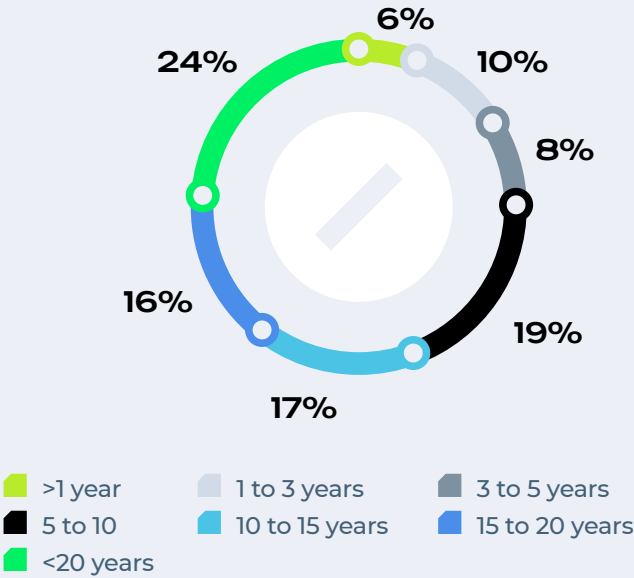


Structure of employees  
by age, %

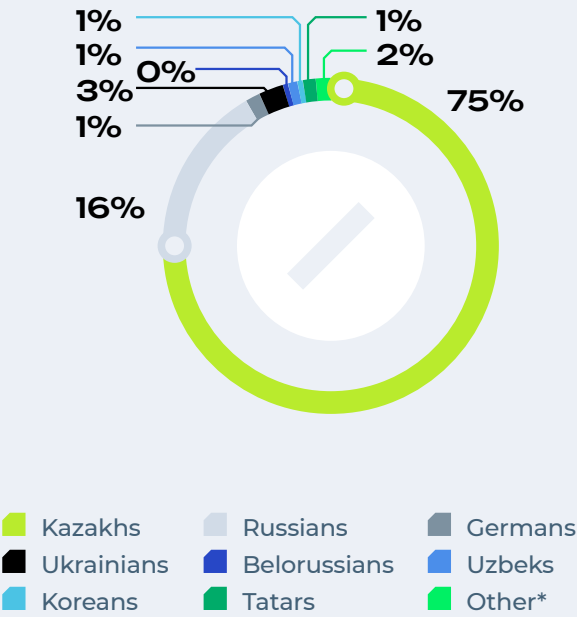




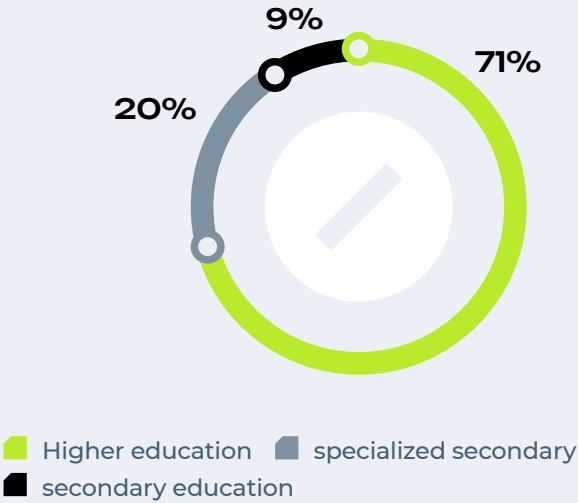
Structure of employees by length of service, %



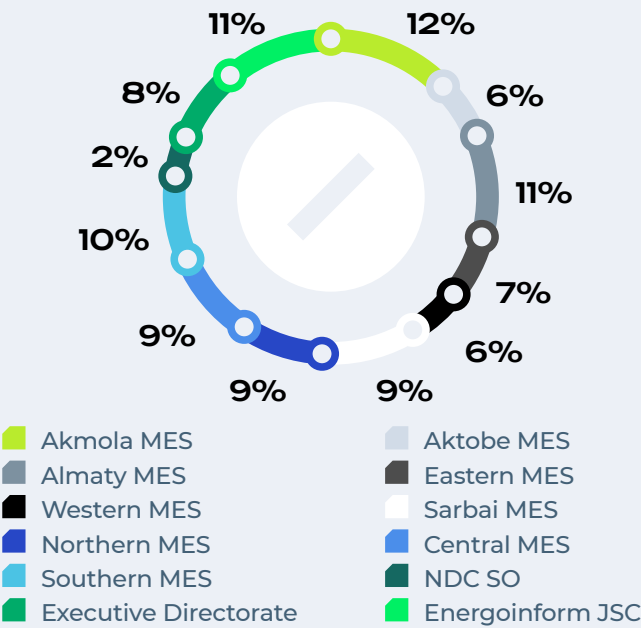
Structure of employees by nationality, %



Structure of employees by education, %



Structure of employees by region, %



\* "Other" includes: Azerbaijanis, Armenians, Kyrgyz, Turks, Uighurs and other nationalities.



Number of permanent and temporary employees at KEGOC JSC in 2024, persons

Subdivision	Permanent employees, persons			Temporary employees*, persons			Total
	Total	Male	Female	Total	Male	Female	
Akmola MES	558	464	94	0	0	0	558
Aktobe MES	264	215	49	3	0	3	267
Almaty MES	465	397	68	13	7	6	478
Eastern MES	293	240	53	2	0	2	295
Western MES	259	210	49	5	1	4	264
Sarbai MES	417	338	79	2	1	1	419
Northern MES	376	287	89	8	0	8	384
Central MES	418	344	74	6	3	3	424
Southern MES	428	362	66	6	0	6	434
NDC SO	106	64	42	2	1	1	108
Executive Directorate	357	189	168	17	8	9	374
Energoinform JSC	475	318	157	15	7	8	490
Total	4,416	3,428	988	79	28	51	4,495

\* Temporary employees are those hired to fill temporarily vacant positions in the Company (excluding internal transfers).

Number of KEGOC JSC employees by job categories in 2024, persons

Subdivision	Total employees	Including		
		Managers	Specialists	Workers
Akmola MES	558	69	202	287
Aktobe MES	267	46	103	118
Almaty MES	478	65	196	217
Eastern MES	295	44	126	125
Western MES	264	44	94	126
Sarbai MES	419	58	156	205
Northern MES	384	54	140	190
Central MES	424	62	164	198
Southern MES	434	62	165	207
NDC SO	108	24	84	0
Executive Directorate	374	84	290	0
Energoinform JSC	490	87	376	27
Total	4,495	699	2,096	1,700

Number of KEGOC JSC employees by gender in 2024, persons

Subdivision	Employee structure by gender		
	Male	Female	Total
Akmola MES	464	94	558
Aktobe MES	215	52	267
Almaty MES	404	74	478
Eastern MES	240	55	295
Western MES	211	53	264
Sarbai MES	339	80	419
Northern MES	287	97	384
Central MES	347	77	424
Southern MES	362	72	434
NDC SO	65	43	108
Executive Directorate	197	177	374
Energoinform JSC	325	165	490
Total	3,456	1,039	4,495

Number of KEGOC JSC employees by age group in 2024, persons

Subdivision	Total	Including by age group (years)									
		Under 30		31-40		41-50		51-60		Over 61	
		people	%	people	%	people	%	people	%	people	%
Akmola MES	558	83	14.87	160	28.67	147	26.34	143	25.63	25	4.48
Aktobe MES	267	43	16.10	95	35.58	48	17.98	71	26.59	10	3.75
Almaty MES	478	94	19.67	165	34.52	106	22.18	92	19.25	21	4.39
Eastern MES	295	45	15.25	110	37.29	58	19.66	67	22.71	15	5.08
Western MES	264	70	26.52	90	34.09	56	21.21	31	11.74	17	6.44
Sarbai MES	419	48	11.46	117	27.92	112	26.73	119	28.40	23	5.49
Northern MES	384	56	14.58	112	29.17	80	20.83	119	30.99	17	4.43
Central MES	424	61	14.39	119	28.07	106	25.00	120	28.30	18	4.25
Southern MES	434	68	15.67	125	28.80	103	23.73	120	27.65	18	4.15
NDC SO	108	17	15.74	35	32.41	36	33.33	18	16.67	2	1.85
Executive Directorate	374	35	9.36	137	36.63	122	32.62	68	18.18	12	3.21
Energoinform JSC	490	74	15.10	191	38.98	109	22.24	96	19.59	20	4.08
Total	4,495	694	15.44	1,456	32.39	1,083	24.09	1,064	23.67	198	4.40



Number of KEGOC JSC employees by length of service in 2024, persons

Subdivision	Total employees	Including													
		Up to 1 year	%	1–3 years	%	3–5 years	%	5–10 years	%	10–15 years	%	15–20 years	%	Over 20 years	%
Akmola MES	558														22.22
Aktobe MES	267	14	5.24	29	10.86	21	7.87	47	17.60	44	16.48	47	17.60	65	24.34
Almaty MES	478	19	3.97	47	9.83	37	7.74	105	21.97	92	19.25	71	14.85	107	22.38
Eastern MES	295	9	3.05	14	4.75	22	7.46	60	20.34	70	23.73	40	13.56	80	27.12
Western MES	264	11	4.17	25	9.47	34	12.88	63	23.86	47	17.80	36	13.64	48	18.18
Sarbai MES	419	19	4.53	45	10.74	39	9.31	73	17.42	60	14.32	62	14.80	121	28.88
Northern MES	384	30	7.81	46	11.98	30	7.81	62	16.15	62	16.15	55	14.32	99	25.78
Central MES	424	33	7.78	49	11.56	14	3.30	84	19.81	71	16.75	68	16.04	105	24.76
Southern MES	434	18	4.15	27	6.22	35	8.06	64	14.75	67	15.44	73	16.82	150	34.56
NDC SO	108	4	3.70	16	14.81	8	7.41	27	25.00	19	17.59	19	17.59	15	13.89
Executive Directorate	374	23	6.15	28	7.49	30	8.02	61	16.31	53	14.17	87	23.26	92	24.60
Energoinform JSC	490	62	12.65	81	16.53	53	10.82	105	21.43	67	13.67	62	12.65	60	12.24
Total	4,495	269	5.98	459	10.21	382	8.50	863	19.20	755	16.80	701	15.60	1,066	23.72

Number of KEGOC JSC employees by ethnic composition in 2024, persons

Subdivision	Total	Kazakhs		Russians		Germans		Ukrainians		Belarusians		Uzbeks		Koreans		Tatars		Others*	
		Number persons	%	Number persons	%	Number of employees, persons	%	Number of employees, persons	%	Number of employees, persons	%	Number of employees, persons	%	Number of employees, persons	%	Number of employees, persons	%	Number of employees, persons	%
Akmola MES	558	416	74.55	84	15.05	12	2.15	14	2.51	5	0.90	1	0.18	0	0.00	6	1.08	20	3.58
Aktobe MES	267	231	86.52	20	7.49	3	1.12	9	3.37	1	0.37	0	0.00	0	0.00	2	0.75	1	0.37
Almaty MES	478	434	90.79	33	6.90	1	0.21	1	0.21	0	0.00	0	0.00	1	0.21	0	0.00	8	1.67
Eastern MES	295	221	74.92	66	22.37	1	0.34	3	1.02	0	0.00	0	0.00	0	0.00	4	1.36	0	0.00
Western MES	264	245	92.80	13	4.92	0	0.00	1	0.38	0	0.00	1	0.38	0	0.00	3	1.14	1	0.38
Sarbai MES	419	207	49.40	155	36.99	10	2.39	33	7.88	2	0.48	0	0.00	2	0.48	5	1.19	5	1.19
Northern MES	384	269	70.05	82	21.35	5	1.30	11	2.86	2	0.52	0	0.00	1	0.26	8	2.08	6	1.56
Central MES	424	289	68.16	79	18.63	12	2.83	13	3.07	4	0.94	0	0.00	5	1.18	10	2.36	12	2.83
Southern MES	434	331	76.27	55	12.67	0	0.00	7	1.61	0	0.00	26	5.99	10	2.30	4	0.92	1	0.23
NDC SO	108	74	68.52	22	20.37	1	0.93	5	4.63	2	1.85	1	0.93	0	0.00	2	1.85	1	0.93
Executive Directorate	374	335	89.57	19	5.08	3	0.80	3	0.80	0	0.00	0	0.00	4	1.07	7	1.87	3	0.80
Energoinform JSC	490	334	68.16	101	20.61	14	2.86	13	2.65	4	0.82	8	1.63	1	0.20	8	1.63	7	1.43
Total	4,495	3,386	75.33	729	16.22	62	1.38	113	2.51	20	0.44	37	0.82	24	0.53	59	1.31	65	1.45

\* “Others” includes Azerbaijanis, Armenians, Kyrgyz, Turks, Uyghurs, and other nationalities.

Number of KEGOC JSC employees by education level in 2024, persons

Subdivision	Total	Including					
		Higher education		specialized secondary		secondary education	
		people	%	people	%	people	%
Akmola MES	558	335	60.04	170	30.47	53	9.50
Aktobe MES	267	186	69.66	56	20.97	25	9.36
Almaty MES	478	322	67.36	104	21.76	52	10.88
Eastern MES	295	180	61.02	83	28.14	32	10.85
Western MES	264	178	67.42	50	18.94	36	13.64
Sarbai MES	419	272	64.92	103	24.58	44	10.50
Northern MES	384	237	61.72	83	21.61	64	16.67
Central MES	424	251	59.20	117	27.59	56	13.21
Southern MES	434	328	75.58	90	20.74	16	3.69
NDC SO	108	108	100.00	0	0.00	0	0.00
Executive Directorate	374	374	100.00	0	0.00	0	0.00
Energoinform JSC	490	432	88.16	40	8.16	18	3.67
Total	4,495	3,203	71.26	896	19.93	396	8.81

Employee structure at KEGOC JSC, persons

GRI 405-1

Indicator		Total	Share, %	Administra- tive personnel	Production personnel	Managers	Share among managers, %
Headcount		4,495	100	482	4,013	699	100
Gender	Men	3,456	76.9	145	3,311	613	87.7
	Women	1,039	23.1	337	702	86	12.3
Ethnic groups	Kazakhs	3,386	75.3	416	2,970	533	76.3
	Russians	729	16.2	42	687	109	15.6
	Ukrainians	113	2.5	4	109	17	2.4
	Tatars	59	1.3	5	54	10	1.4
	Germans	62	1.4	6	56	10	1.4
	Others	146	3.2	9	137	20	2.9
Age groups	Under 30 years	694	15.4	32	662	43	6.2
	30 to 50 years	2,539	56.5	343	2,196	456	65.2
	Over, 50 years	1,262	28.1	107	1,155	200	28.6

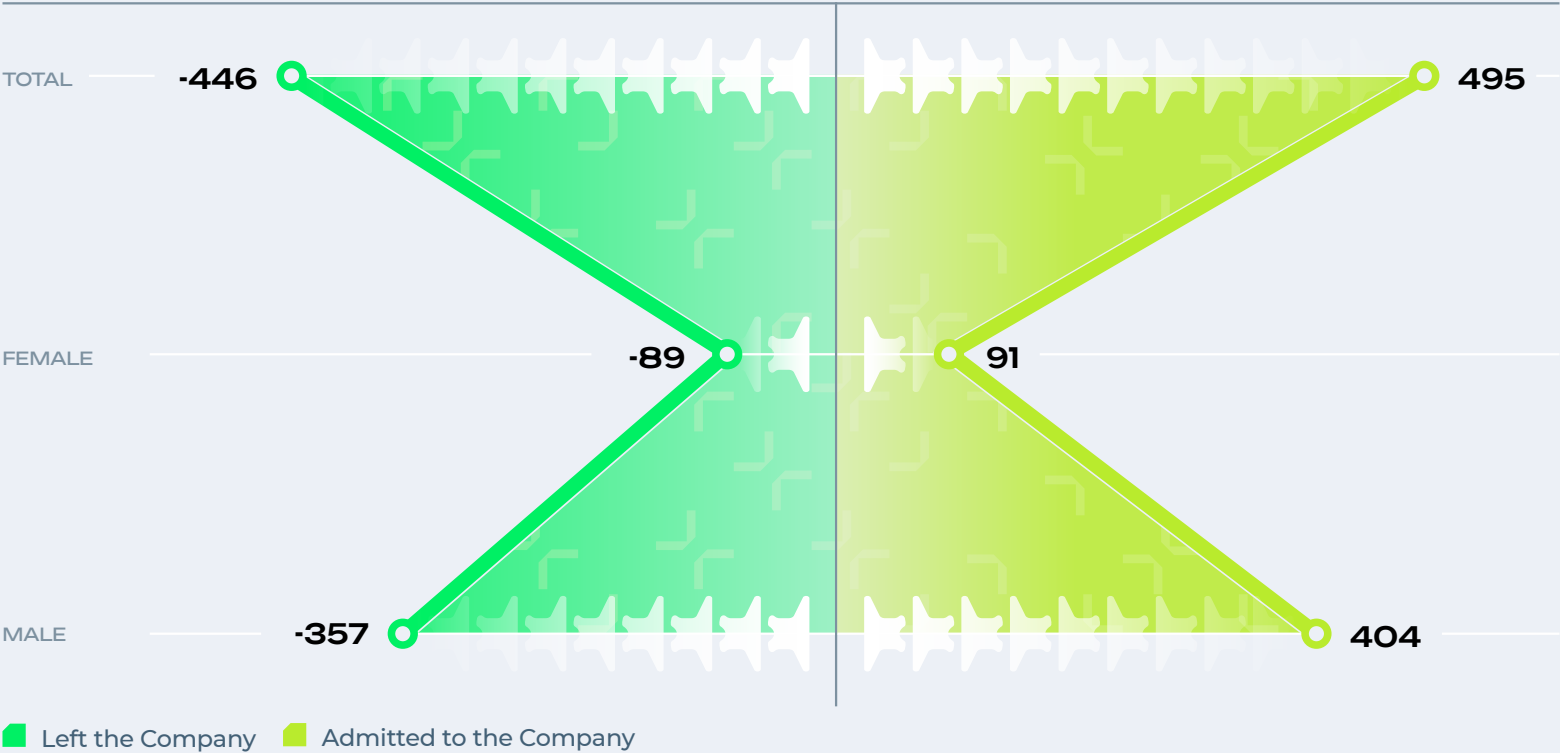
Gender ratio of employees by job categories in 2024, persons

Name of job categories	Total	Male	Female	Male, %	Female, %
Managers at all levels	699	613	86	87.7%	12.3%
Junior managers (1st level of management)	688	604	84	87.8%	12.2%
Senior managers	11	9	2	81.8%	18.2%
Managers in the production staff category	595	559	36	93.9%	6.1%
Managers in the administrative staff category	104	54	50	51.9%	48.1%
STEM employees	1,961	1,477	484	75.3%	24.7%

GRI 202-2

The total share of top executives (members of the Board of Directors and the Management Board of KEGOC JSC) hired from the local population (citizens of the Republic of Kazakhstan) as of December 31, 2024, is 100%.

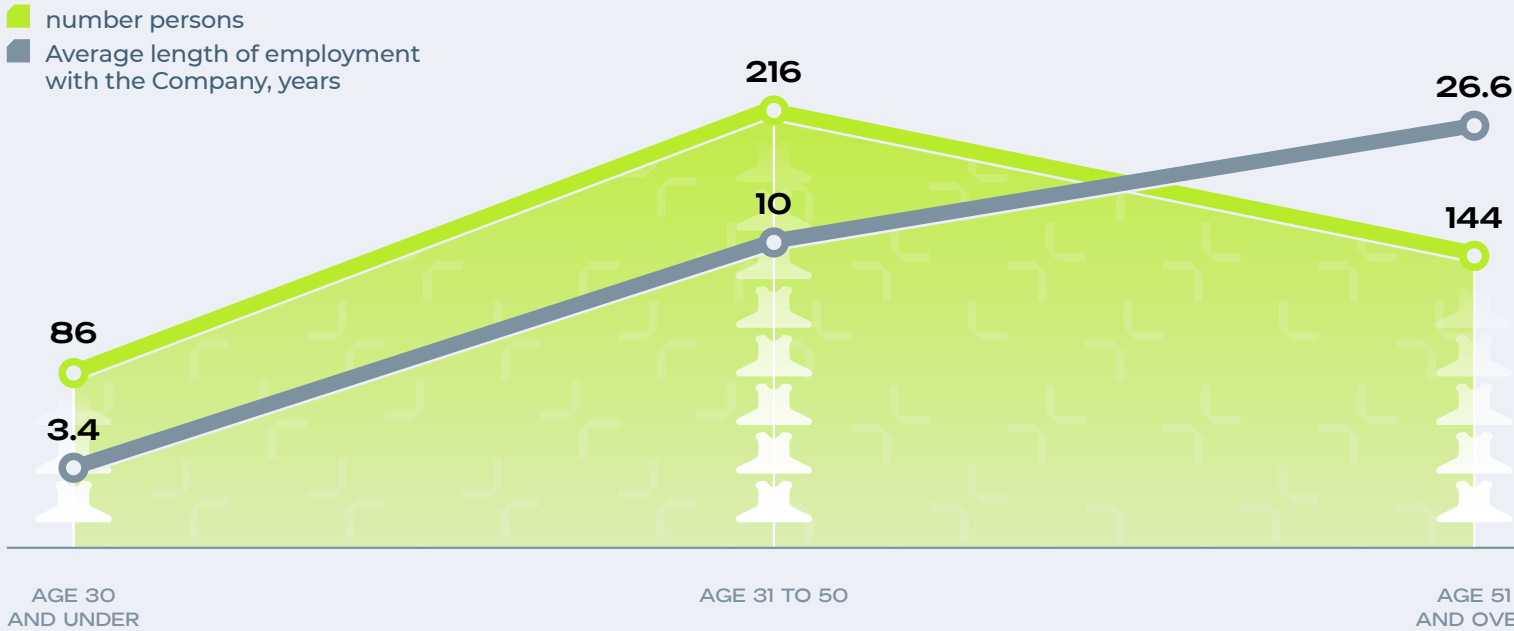
Dynamics of personnel at KEGOC JSC in 2024, persons



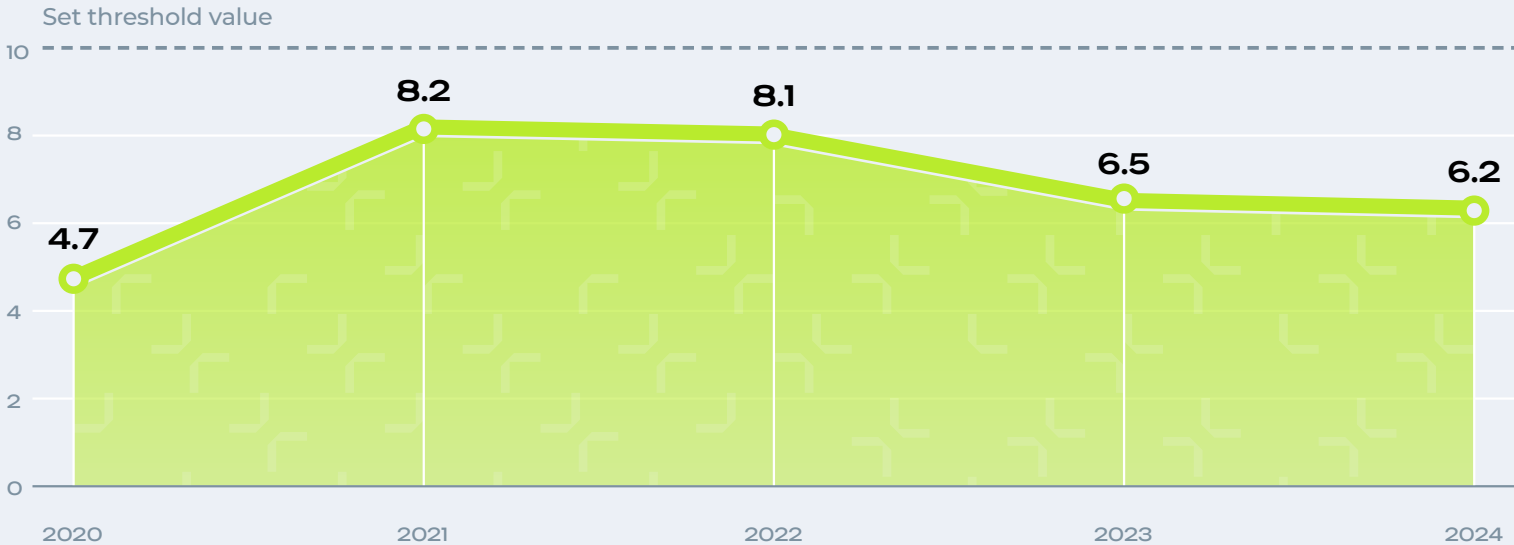


Length of employment of employees leaving the Company in 2024

EU14



Staff turnover at KEGOC JSC\*, %



\* The turnover rate is calculated according to the methodology of Samruk-Kazyna JSC, which only considers employees who resigned voluntarily. The calculation of turnover does not include employees who were dismissed within the Group of companies Samruk-Kazyna JSC due to circumstances beyond the control of the parties, at the employer's initiative, upon the expiration of the employment contract, due to staff reduction, termination of the employment contract, or termination of the employment contract in connection with the employee's transition to an elected position or appointment to a position.

EU14

The final employee turnover rate at KEGOC JSC for 2024 was 6.21%, with a set threshold value of 'no higher than 10%'. The turnover rate among men was 6.61%, while among women it was 4.91%. The average length of service for men who left the Company in 2024 was 13.8 years (357 employees), and for women, it was 13.6 years (89 employees).

6.21%

employee turnover rate at KEGOC JSC in 2024

Share of KEGOC JSC employees eligible for retirement

GRI EU15

Indicator	Total	AMP	PP
May retire between 2023 and 2027 (within the next 5 years)	10.90	0.69	10.21
May retire between 2023 and 2032 (within the next 10 years)	23.60	1.74	21.87

Subdivision	Total, persons	Employees eligible for retirement in 2025–2029			Employees eligible for retirement in 2025–2034			% of employees eligible for retirement	
		Total	Including		Total	Including		In the period of 2024–2028	In the period of 2024–2033
			AMP	PP		AMP	PP		
Akmola MES	558	70	3	67	145	7	138	12.54	25.99
Aktobe MES	267	29	-	29	74	4	70	10.86	27.72
Almaty MES	478	42	2	40	102	4	98	8.79	21.34
Eastern MES	295	22	3	19	49	1	48	7.46	16.61
Western MES	264	28	1	27	40	2	38	10.61	15.15
Sarbai MES	419	61	2	59	154	7	147	14.56	36.75
Northern MES	384	49	1	48	102	3	99	12.76	26.56
Central MES	424	61	2	59	110	4	106	14.39	25.94
Southern MES	434	53	1	52	119	6	113	12.21	27.42
NDC SO	108	8	-	8	17	-	17	7.41	15.74
Executive Directorate	374	29	15	14	66	37	29	7.75	17.65
Energoinform JSC	490	38	1	37	83	3	80	7.76	16.94
Total	4,495	490	31	459	1,061	78	983	10.90	23.60

## PERSONNEL SEARCH AND SELECTION

In order to attract employees with appropriate qualifications, increase their engagement, and ensure competitiveness in the labor market, the Company creates an employer's offer consisting of the following elements:

- ◆ **unique experience:** each employee has the opportunity to gain professional experience and contribute to the company's development, thereby increasing their market value.
- ◆ **social significance:** every employee contributes personally to the company's development.
- ◆ **competitive working conditions:** compensation is based on market benchmarks, with opportunities for training and development, and social benefits.
- ◆ **corporate values:** the company's activities are based on values aimed at creating a favorable environment for productive work and employee self-fulfillment.

Recruitment and selection is aimed to appoint the most suitable candidates who meet the required qualifications, professional, business, and personal qualities. Candidate selection is conducted through a competitive process, adhering to the principles of meritocracy, transparency, and objectivity. When conditions are equal, priority is given to internal candidates of the Company.

Sources and methods for finding and selecting qualified specialists include:

- ◆ talent pool;
- ◆ internal candidates (employees of the company/ subsidiaries);
- ◆ employees of the samruk-kazyna jsc group;
- ◆ electronic candidate database formed on the unified online recruitment platform 'samruk qyzmet';

- ◆ electronic database of specialists created through the collection and analysis of candidate resumes in various professional fields;
- ◆ electronic database of graduates from young specialist development programs/talent management programs implemented under the aegis of samruk-kazyna jsc;
- ◆ job postings on the website, industry communities, and social networks;
- ◆ use of business contacts and recommendations;
- ◆ engagement of recruitment companies.

Recruitment and selection for vacant positions at KEGOC JSC is carried out via the "Samruk Qyzmet" recruitment platform. During resume screening and preliminary candidate assessment, compliance with the qualification requirements for each vacancy is strictly monitored. In the reporting year, 191 vacancies were announced. Based on the outcomes of the competitive selection processes, 143 external candidates were hired, while 33 vacancies were filled by internal candidates. The share of vacancies filled internally amounted to 17.3%.



Indicators of search and selection of personnel for vacant positions of KEGOC JSC

	2020	2021	2022	2023	2024
Total number of employees hired	343	451	551	543	403
Talent pool	14	19	21	12	13
Internal candidates	5	17	34	61	33
Involvement of recruiting companies, including Samruk Qyzmet electronic database of recruiting candidates	80	107	192	170	143
including the use of interviewing and assessment of competences of candidates for positions at the CEO-1 level	2	3	4	1	2
Interviewing costs per 1 person, mln tenge	0.49	0.65	0.42	0.43	0.50
Electronic database of graduates of young professionals development/talent management programmes	2	0	3	0	0
Electronic database of specialists formed by collecting and analysing CVs of candidates in various professional areas	242	308	301	247	221



## INCENTIVE SYSTEM

Employee remuneration in the Company is carried out in accordance with the legislation of the Republic of Kazakhstan, the Collective Agreement, employment contracts, and internal documents on remuneration and bonuses.

The remuneration and motivation system includes fixed and variable components, social benefits, and non-material incentives.

Guided by the principles of transparency, openness, internal fairness, and external competitiveness, the Company is improving the system of recognizing employee merits, rewarding work achievements, and the remuneration system to balance the interests of the Company and its employees. The following approaches are used to implement this direction:

- ♦ regular analysis of wage levels and trends in the labor market across industries and regions;
- ♦ maintaining wage levels in accordance with the company's goals and financial-economic capabilities;
- ♦ open and transparent communications to explain the remuneration system to employees, considering the current situation in the company and the labor market as a whole;
- ♦ maintaining a differentiated approach to determining employee wage levels. the differentiated approach to the reward system is based on the contribution of each department and employee to the company's performance;

- ♦ reducing pay gaps between administrative-management and production personnel and increasing wages for low-paid workers.

The Company operates a graded pay system based on the 'Hay Group' methodology for administrative and engineering-technical personnel. This remuneration system has enabled the development of a scheme of job levels considering qualifications, work experience, and responsibility levels, based on wage reviews and the Company's financial-economic capabilities.

In accordance with labor legislation, KEGOC JSC has implemented a practice allowing remote or hybrid remote work arrangements to be established at the initiative of the employee or the employer, based on mutual agreement.

The Company ensures equal pay for men and women, as well as a unified approach to determining remuneration for male and female employees across all KEGOC JSC branches located throughout the regions of Kazakhstan. In 2024, the salary levels of KEGOC JSC employees exceeded the minimum wage established in the Republic of Kazakhstan.

### Ratio of standard entry-level salary of KEGOC JSC employees to the minimum wage established in the Republic of Kazakhstan for 2024

Minimum wage in the Republic of Kazakhstan in 2024, KZT	Minimum wage in KEGOC JSC* in 2024, KZT	Deviation, %
85,000*	175,000**	105.9

\* established from 1 January 2024 minimum wage according to the Law of the Republic of Kazakhstan dated 5 December 2023 No. 43-VIII 'On the Republican Budget for 2024-2026'

\*\* the minimum wage level means the official salary of the technician of the subsidiary organisation of Energoinform JSC.

### Ratio of remuneration of women to men at KEGOC JSC\*\*

GRI 405-2

	Men	Women
Executive management	8	2
Management staff and heads of structural subdivisions	576	74
Specialists and workers	2,780	831

Ratio of average monthly salary of women and men	
Executive management	1.29
Management staff and heads of structural subdivisions	1.00
Specialists and workers	1.00

Ratio of average monthly total annual compensation of women and men*	
Executive management	1.45
Management staff and heads of structural subdivisions	1.09
Specialists and workers	1.04

\* The average monthly total annual compensation per employee is calculated by dividing the total accrued payroll by the actual number of employees and the number of months in the reporting period. The payroll fund includes:

- wages accrued based on tariff rates and official salaries;
- one-time payments and bonuses;
- compensation payments related to work schedule and working conditions;
- payments for non-working time.

The actual number of employees (used for calculating the average salary) refers to the headcount excluding specific employee categories formally retained on staff but not performing work duties (e.g. employees on maternity leave, childcare leave, and others).

\*\* KEGOC JSC operates throughout the entire territory of the Republic of Kazakhstan (material region of activity); therefore, the indicator is calculated at the national level.

To enhance the competitiveness of remuneration, in the reporting year KEGOC JSC increased official salaries/tariff rates for employees by 15%, effective from 1 January 2024. Due to the high demand for dispatch personnel in the labor market—who require a high level of professional qualifications and long training periods, salaries for this category were increased by 20%. Additionally, to retain blue-collar workers in the Mechanization and Transport Workshop, tariff rates were increased by 15% to 26%, and a special bonus was introduced for operating lifting equipment.

To support social stability and employee motivation, additional bonuses of KZT 200,000 (net of taxes

and mandatory deductions) were paid to each employee in celebration of Republic Day and Independence Day of the Republic of Kazakhstan.

As a form of non-financial recognition, 200 employees were awarded state, industry, and KEGOC JSC awards on the occasion of Republic Day, Independence Day, and Energy Worker's Day.

In the reporting year, KZT 23.0 million was paid out under the Company's incentive program for employees who received awards or won professional and sports competitions.

### Indicator of average salary level in KEGOC JSC in 2024

Average salary in the industry of the Republic of Kazakhstan in 2024, KZT	Average salary level in KEGOC JSC* in 2024, KZT	Deviation, %
564,800*	711,270**	28.1%

\* according to the information of 'Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan'.

\*\* average monthly salary at KEGOC JSC for 2024.

SOCIAL PROTECTION OF EMPLOYEES

GRI 2-24

The Company’s activities on social support for employees are regulated by the following internal documents:

- ◆ Collective Agreement;
- ◆ Personnel Policy of KEGOC JSC for 2018-2028;
- ◆ Rules for providing social support to employees;
- ◆ Rules for encouragement and recognition of employee merits.

The above policies apply to all Company employees, including temporary employees and part-time workers.

In accordance with these documents, the following types of social support are provided to KEGOC JSC employees:

- ◆ financial assistance;
- ◆ compensation payments;
- ◆ assistance in solving housing issues.

KEGOC JSC, aiming to create favorable conditions for effective work and increase loyalty, provides financial assistance for health improvement during paid annual leave, for anniversaries, childbirth, the death of an employee, family members, and retirees registered with KEGOC JSC, for the payment of medical treatment for employees and disabled children, and for individuals with lifelong disabilities, regardless of the disability group or age. Compensation is paid to employees of retirement age upon their retirement.

Additionally, KEGOC JSC pays maternity leave, leave for employees who adopt a newborn child (children), with the retention of average wages, minus the amount of social benefits for income loss due to maternity and adoption, in accordance with the legislation of the Republic of Kazakhstan on mandatory social insurance.

The Company provides social leave with pay for marriage registration, childbirth, funerals of close relatives, jubilees (50, 60 years), and for women, single fathers, and guardians raising children from 6 to 9 years old on the first day of the school year, and for parents of graduating students on the ‘last bell’ day. Rest days are also provided for preventive vaccinations and for parents with disabled children under 18, with the retention of average wages. In the reporting year, social leave was granted to 156 employees.

Furthermore, in accordance with the Labor Code of the Republic of Kazakhstan, the Company grants unpaid leave for childcare until the child reaches the age of three:

- ◆ at the choice of the parents — either the mother or father;
- ◆ for a parent raising the child alone; another relative actually raising the child left without parental care, or a guardian;
- ◆ for an employee who has adopted a newborn child (children).

Employees may take childcare leave until the child reaches three years of age in full or in parts. During the leave, the employee’s position (job) is retained. If returning to work before the end of the leave period, the employee notifies the employer of their intention a month before starting work. In 2024, such leave was granted to 37 employees (1 men and 36 women). In 2024, 29 women and 2 men returned from childcare leave. According to labor legislation, in 2024, 2 women with children under 1.5 years of age, or fathers raising children without a mother, were granted additional breaks for breastfeeding.

In 2024, KEGOC JSC implemented a Preferential Loan Program aimed at social support for employees to retain and attract highly qualified personnel needed by the Company. As a result, 9 employees acquired housing in 2024. Additionally, the Company assisted 141 employees in solving housing issues by partially reimbursing housing expenses amounting to KZT 182.7 million.

SUPPORT FOR EMPLOYEES  
AFFECTED BY FLOODS

Due to the state of emergency caused by flooding in several regions of Kazakhstan during the spring flood season in April 2024, some employees of KEGOC JSC branches suffered significant losses. As a result of large-scale flooding in the cities of Kulsary, Petropavlovsk, Yesil, Aktobe, Uralsk, and Arkalyk, the homes and property of 15 employees and 1 outstaffed worker were affected. To provide financial assistance to employees impacted by the floods, KEGOC JSC employees voluntarily donated the equivalent of one day’s wages, raising a total of KZT 54.7 million. The funds collected were distributed among the affected employees based on the extent of the damage sustained.

Thus, in 2024, the total funds allocated for social support for Company employees amounted to KZT 829.2 million.

In 2024, total employee expenses, including salaries, social support, training, etc., amounted to KZT 43.6 billion (KZT 23.2 billion in 2019, KZT 25.2 billion in 2020, KZT 26.2 billion in 2021, KZT 31.8 billion in 2022 and KZT 37.5 billion in 2023).

In 2024, several initiatives were implemented as part of a broader program aimed at improving employee well-being. These measures focus on creating more comfortable working conditions and increasing overall employee satisfaction.

To strengthen internal communications, the “Online KEGOC” community was launched in the WhatsApp messenger, where HR-related news and announcements are regularly shared. In addition, dedicated groups were created for distributing online training courses.

Furthermore, in the reporting year, the Company introduced a practice of holding informational sessions on various topics, including physical health, healthy eating, psychology, and personal financial literacy.

An important initiative to support employees’ mental well-being was also launched in 2024. As part of this effort, a full-time psychologist position will be introduced in 2025. This is expected to significantly support employees in stressful situations, improve the overall workplace atmosphere, and promote emotional well-being.

In 2025, KEGOC JSC plans to continue implementing further measures to enhance employee well-being.



TRAINING AND DEVELOPMENT

At KEGOC JSC, investments in employee training and development align with the Company’s needs to achieve its strategic goals. Each employee is responsible for their own training and development based on the 70/20/10 principle in accordance with their individual development plan.

Knowledge systematization and the formation of a quality personnel pool occur through self-development, training events, mentoring, coaching, implemented projects, and the formation of professional communities.

Based on the collection and analysis of needs, considering individual development plans, the KEGOC JSC Personnel Training Plan for 2025 and the KEGOC JSC Personnel Professional Competence Development Program were formed and approved.

One of the key objectives for maintaining and enhancing the Company’s competitive advantage includes:

- ♦ prioritizing the training of engineering and technical specialists and blue-collar professionals;
- ♦ implementing competency development programs aligned with business needs;
- ♦ participating in modular training programs of Samruk-Kazyna JSC;
- ♦ developing a unified internal system of coaching, mentoring, and training to foster in-house expertise.

KEGOC JSC’s professional competency development program is focused on enhancing skills in the following areas:

- ♦ electric power industry;
- ♦ software and IT systems;
- ♦ sustainable development;
- ♦ IT and telecommunications;
- ♦ international certification;
- ♦ regulatory and legal frameworks.

Training is conducted using a full range of modern learning formats: business workshops, seminars, trainings, internships, qualification upgrades, professional training and retraining programs, forums, and conferences. In the reporting year, the training administration process was centralized under the HR function.

In 2024, a total of 2,582 employees received training, representing 57.4% of the total headcount. Actual training expenses amounted to KZT 327.4 million. The average training and development cost per employee was KZT 126.80 thousand.

According to the 2023 analysis of employee education levels, 29% of employees have secondary or vocational secondary education. To support skill advancement and provide career development opportunities, a University education program was developed and approved in the reporting year. Under this initiative, 80% of tuition costs will be reimbursed to employees by the employer.



2,582  
persons

employees received training  
in 2024

327.4  
million tenge

expenses of “KEGOC” JSC  
for training

41.23  
hours

the average number  
of training hours per  
employee

Number of employees trained in 2024, persons

	AMP	PP
Men	105	2,037
Women	205	235
Total	310	2,272

The average annual number of training hours per employee in 2024 was 41.23 hours. The total number of training hours amounted to 105,003 hours.

Number of training hours for KEGOC JSC personnel in 2024

	Men	Women	AMP	PP
Total number of training hours	83,473	21,530	18,345	86,658
Average number of training hours per 1 employee	32.8	8.5	7.2	34

Cost of training for KEGOC JSC personnel in 2024, million tenge

Training direction	Total amount
Electric power industry, dispatching, relay protection	56.8
Occupational health, industrial safety, and mandatory training	38.9
Telecommunications and information technologies	21.6
Finance, economics, and accounting	15.9
Environment and ESG	5
Capital construction	5.4
Other	43.7
Total (excluding travel expenses)	187.33

In 2024, the Company implemented the following employee development programs, which had a positive impact on business performance:

**SOFT SKILLS DEVELOPMENT PROGRAM**

**Program description**

A series of training sessions on the following topics:

- ◆ Effective public speaking and interaction with the media
- ◆ Negotiation, internal communication, and time management skills

**Benefits for business**

- ◆ Improved quality of internal communications
- ◆ Enhanced public image of the Company
- ◆ Increased labor productivity
- ◆ Reduced conflict and improved team effectiveness.

**“ZHETI QADAM” PROGRAM**

**Program description**

A modular program for young leader development. Five young specialists participated to enhance their managerial, strategic, and teamwork skills.

**Benefits for business**

- ◆ Formation of a talent pipeline
- ◆ Increased youth engagement
- ◆ Preparation of future leaders
- ◆ Reduced risk of losing high-potential talent

For the first time, KEGOC JSC organized and held a Young Employees Forum. The Forum program included meetings with the Company’s management, strategic sessions, training on “Change Management,” as well as outdoor physical activities. A total of 53 employees participated in the Forum.

In 2024, the development of the internal coaching institute continued. A “Train-the-Trainer” program was conducted for internal trainers. The Company collected internal training needs from structural units and approved a company-wide internal training schedule for the year. In total, 15 internal training sessions were delivered by in-house trainers in 2024.

To support knowledge management and expand access to learning, the Company launched an initiative to create educational video courses in various areas of KEGOC JSC’s operations. Employees are given the opportunity to structure, retain, and share their knowledge with colleagues by producing training videos.

To provide a platform for student internships, the Company maintains regular cooperation with educational institutions. Each year, students from technical colleges and universities complete industrial and pre-graduation internships within KEGOC’s structural units. In 2024, 435 students underwent practical training at the Company.

Additionally, to strengthen human capital and develop strategic competencies in priority areas, senior managers at CEO-1 and CEO-2 levels completed MBA programs in 2024.

**EMPLOYEE EVALUATION**

The Company is improving the performance management system, which helps develop employees’ potential to achieve specific results. The key objectives of the Company’s performance management system development are:

- ◆ cascading kpis from corporate business goals to each employee;
- ◆ objective evaluation, mandatory feedback on evaluation results for all levels of managers and employees;
- ◆ regular evaluations and maintaining a consistent methodology to monitor employee performance dynamics, and using additional types of performance evaluations as necessary.

Employee performance evaluation is based on meritocracy principles and is conducted regularly: quarterly and annually. A comprehensive evaluation is performed based on work results and employee competencies (according to the competency model) for the reporting year.

The comprehensive evaluation includes the distribution of employees on the talent map based on their performance in achieving KPIs/goals and their competency levels (professionalism and potential).

Competency evaluation is carried out according to the approved competency model and provides the most objective assessment of employees’ personal and professional qualities. The Company’s competency model includes the evaluation of:

- ◆ professional knowledge and experience;
- ◆ attitude towards the company and colleagues;
- ◆ personal effectiveness;
- ◆ result orientation;
- ◆ teamwork;
- ◆ managerial competencies.





IN 2024, A TOTAL OF 1,991 EMPLOYEES OF KEGOC JSC UNDERWENT A COMPREHENSIVE PERFORMANCE APPRAISAL BASED ON 2023 RESULTS, ACCOUNTING FOR 51% OF THE COMPANY'S TOTAL HEADCOUNT. THIS INCLUDED 424 ADMINISTRATIVE AND MANAGEMENT PERSONNEL AND 1,567 PRODUCTION PERSONNEL.

Based on the performance evaluation results, the following management and development decisions may be made:

- ♦ revising salary levels;
- ♦ paying quarterly/annual bonuses/rewards;
- ♦ considering employees for inclusion in the talent pool (personnel reserve);
- ♦ further employee development.

As a long-term employee motivation tool, KEGOC JSC operates a talent management system, which provides employees demonstrating high qualifications and performance with opportunities for career development, investment in training and development, and recognition for their achievements.

The composition of the talent pool is reviewed annually based on appraisal results. In the reporting year, the Management and Functional Talent Pools were approved, comprising 265 employees, along with a list of key positions and mentors.

To assess the effectiveness of this process, the indicator “Percentage of appointments from the Functional/ Management Pool” is used, which amounted to 73% in the reporting year.

To support the development of high-potential employees, annual meetings are held between members of the Board of Directors and the executive team with members of the talent pool.

To ensure a comprehensive approach to professional orientation and to support employees in their development journey, the Company operates a mentorship system. In 2024, 58 mentors received a total of KZT 8,104.4 thousand in rewards for supervising trainees.

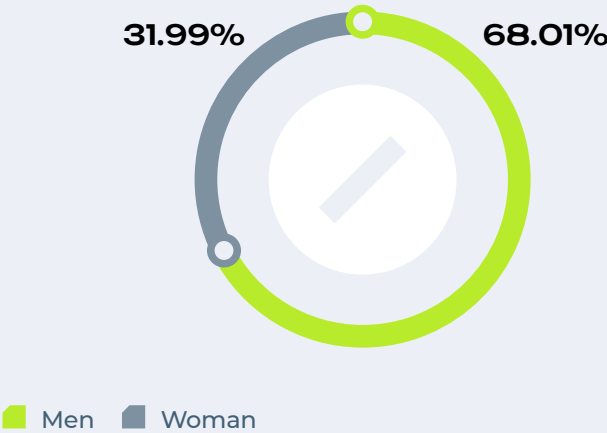
Mentors who demonstrate outstanding performance in guiding young professionals take part in the annual “Best Mentor of the Year” competition. In the reporting year, the winner of the competition was Ilya Gromov, Lead Engineer of the Relay Protection and Automation Service at the Almaty MES branch of KEGOC JSC.

As part of long-term employee motivation, those included in the successor pool for key positions are offered long-term training opportunities through MBA and DBA programs.

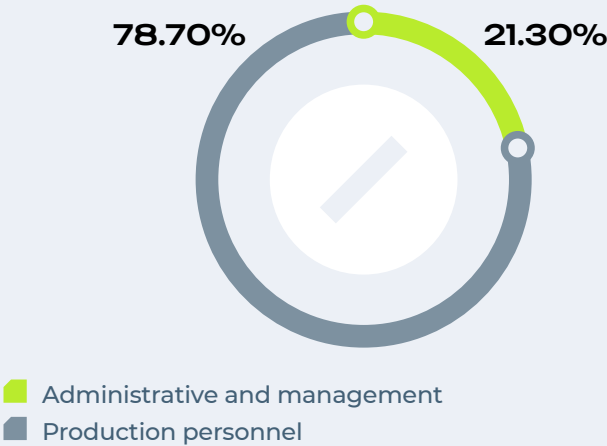
In addition, qualification commissions are held on a regular basis to assign professional grades and ranks to specialists and blue-collar workers. Commission members assess employees through professional interviews, allowing for an objective evaluation of each employee's knowledge, skills, and experience. In 2024, 125 specialists were assigned professional grades, and 157 workers were assigned job ranks.



Gender structure of assessed employees, %



Structure of evaluated employees by category, %



# STRATEGIC WORKFORCE PLANNING AND DATA ANALYTICS

As part of the annual process for developing and approving the 5-year rolling Action Plan (Business Plan) and the annual Budget of KEGOC JSC, strategic workforce planning is carried out.

For the period 2025–2029, the following types of personnel-related costs are planned: remuneration and incentive payments, social support, taxes and mandatory contributions, training and development, as well as projected headcount increases.

**WHEN FORMING THE REMUNERATION FUND, THE COMPANY TAKES INTO ACCOUNT SALARY SURVEY DATA, SECTORAL AND REGIONAL STATISTICS ON AVERAGE MONTHLY WAGES, THE INFLATION RATE, AND KEGOC JSC FINANCIAL AND ECONOMIC CAPACITY.**

Headcount planning is based on the investment program, staff turnover indicators, projected number of pre-retirement employees, and other factors. Additional personnel are planned for the period 2025–2029 to operate facilities commissioned under the investment projects “Integration of the Western Kazakhstan Power System with the UPS of Kazakhstan” and “Strengthening the Power Grid of the Southern Zone of the UPS of Kazakhstan” in 2027–2028.

The calculation of the additional headcount is based on the Personnel Staffing Standards for grid companies performing operational and maintenance work on intersystem transmission lines and substations. These standards were developed and approved by the Ministry of Labour and Social Protection of Population of the Republic of Kazakhstan and the Ministry of Energy of the Republic of Kazakhstan, in accordance with the Rules for the submission, review, and approval of labor standards and/or parameters for the remuneration system of employees of regulated organizations, approved by Order No. 1037 of the Minister of Health and Social Development of the Republic of Kazakhstan dated 28 December 2015.

To ensure generational continuity, KEGOC JSC annually updates the list of pre-retirement employees, who, in accordance with internal procedures, are assigned goals related to knowledge transfer and successor training throughout the calendar year.

The Company also advances its industrial relations (IR) framework. Based on the results of the IR screening, an action plan was developed to address identified gaps and nonconformities.

# COLLECTIVE AGREEMENT AND TRADE UNION ACTIVITIES

94%

share of members  
of the trade union  
organization of employees  
of KEGOC JSC in the total  
number of employees



KEGOC JSC employees have the right to freedom of association, including the right to establish and join public organizations that represent their interests. The Company supports employee participation in political, educational, charitable, and other civic activities, provided such involvement does not interfere with the performance of work duties or cause harm to society.

**KEGOC JSC RECOGNIZES AND SUPPORTS THE RIGHT OF EMPLOYEES TO ENGAGE IN COLLECTIVE BARGAINING AND TO CONCLUDE COLLECTIVE AGREEMENTS.**

The Collective Agreement, developed with input from employees and signed between KEGOC JSC and its workforce for the period 2021–2025, sets forth procedures for accession, regulates working conditions—including rest time during social leave remuneration, occupational health and safety, provision of social guarantees and compensation. It also outlines specific measures for employee support, development of human capital, medical insurance, and cultural and recreational activities.

Amendments to the Collective Agreement introduced new provisions for the provision of personal protective equipment (special clothing, footwear, and other safety gear) at the Company's expense. It also includes measures for the social support of veterans of the Great Patriotic War and persons equated with them, as well as veterans of the energy sector registered with the Company.



GRI 2-30

The Collective Agreement applies to 100% of KEGOC JSC employees, regardless of their employment type.

In accordance with the terms of the Collective Agreement, the employer must notify employees in writing at least fifteen calendar days in advance of any changes to working conditions. The minimum notice period for termination of employment due to staff reductions, as stipulated in the Company's Collective Agreement, is one month, in compliance with the Labor Code of the Republic of Kazakhstan.

The trade union organization representing employees of the energy and technical sector was established on 27 March 2003 during a trade union conference of KEGOC JSC employees. The union is tasked with monitoring compliance with labor legislation and safeguarding the implementation of employee guarantees, compensation, and benefits.

Today, the structure of the EnergyTech Trade Union PA includes 10 primary trade union organizations. As of 2024, the total number of KEGOC JSC trade union members was 3,759, representing over 94% of the Company's total workforce. Compared to the previous year, union membership increased by more than 7%.

As a member of the Republican Association of Trade Unions of the Kazakhstan Confederation of Labor, KEGOC JSC's trade union is a permanent member of the working commission and actively participates in the activities of the Ministry of Labour and Social Protection of Population regarding the Labor Code

and the Law of the Republic of Kazakhstan "On Trade Unions." The union also contributed to the development of the draft General Agreement and the Sectoral Agreement.

During the reporting period, trade union committees actively organized and held social, sports, and wellness events. Special attention was given to veterans of the energy sector and participants of the Great Patriotic War. Material and financial assistance was provided, subsidized sanatorium vouchers were offered, and veterans were invited to participate in corporate events. In celebration of the International Day of Older Persons, KEGOC JSC honored Company veterans.

To improve legal awareness and the competencies of trade union representatives, a training session was held for members of the Conciliation Commission on the topic: "Labor Disputes: Fundamentals of the Labor Legislation of the Republic of Kazakhstan, Negotiation, and Reaching Consensus." To summarize the outcomes of 2023 and exchange experience, a reporting conference was held on 3 May 2024 in Shymkent, attended by employees of the "South MES" branch and other delegates.

Trade union committees pay particular attention to occupational health and safety. Public inspectors regularly conduct on-site inspections at the Company's facilities, and corrective measures are taken to improve working conditions based on the inspection results. In 2024, the following contests were held: "Best Mentor of the Year", "Best Branch for Occupational Safety Compliance", "Best Occupational Safety Technical Inspector".

# DEVELOPMENT OF CORPORATE CULTURE AND VOLUNTEERING

To improve teamwork, loyalty, and a positive atmosphere within the team, employees of KEGOC JSC regularly participate in corporate events. In 2024, KEGOC JSC organized celebrations such as Power Engineer's Day and the annual drawing contest among employees' children dedicated to Children's Day.

Company employees took part in the spartakiads of KEGOC JSC and Samruk-Kazyna JSC, as well as in other sports events: the Samruk-Kazyna Charity Marathon, the tournament organized by the Kazakhstan Football Fans League, and the Astana "Spring-23" mini-football championship.

As part of youth policy and the implementation of the Youth Council's action plan, KEGOC JSC held its first Youth Forum, and representatives of regional



branches took part in the modular young leaders development program "Zheti Qadam" organized by Samruk-Kazyna JSC.

In addition, Company employees participated in several volunteering initiatives. These included Donor Day, the "Tugan Elge Sayakhat" excursion project for children of employees working in remote regions, the "All Ability Camp" project of the Samruk-Kazyna Trust Corporate Foundation involving children and teenagers with special needs in sports through the organization of sports camps and the motivation of parents through dedicated parent clubs. Employees also supported the traditional charity campaign "Let's Get a Child Ready for School," in which children from low-income and disadvantaged families received school backpacks with supplies and stationery. Environmental initiatives included the eco-challenge "Careful and Clean Nature Maintenance" and the "Taza Qazaqstan" environmental campaign, involving clean-up days at memorial sites and playgrounds, delivery of coal to residents of private homes, and planting of greenery and trees. On the International Day of Older Persons, pensioners registered with KEGOC JSC, as well as veterans of the Great Patriotic War and wartime labor, were honored and received food baskets.

Employees actively supported colleagues and their children facing serious illnesses by organizing charity challenges, and all employees participated in humanitarian and charitable assistance for those affected by spring floods and inundations.



# ENVIRONMENTAL PROTECTION

GRI 2-12, 2-13

## KEY INDICATORS FOR 2024

**2,370,678**  
tonnes of CO<sub>2</sub>-eq

total greenhouse gas emissions  
(Scope 1 and Scope 2)



**9,045.42**  
tonnes of CO<sub>2</sub>-eq

reduction in greenhouse gas emissions due  
to energy-saving and energy efficiency measures



KEGOC JSC considers environmental protection activities as an integral part of its daily work. Responsible attitude to the environment is a key principle of KEGOC JSC Environmental Policy.

## KEY DOCUMENTS IN THE AREA OF ENVIRONMENTAL PROTECTION

- ◆ Development Plan (Strategy) of KEGOC JSC for 2023–2032
- ◆ Sustainable Development Management System Manual
- ◆ Environmental Policy
- ◆ Objectives in the areas of quality, environment, occupational health and safety
- ◆ Register of Environmental Aspects
- ◆ Environmental Management System Planning Standard
- ◆ Waste Management Standard

## CONTRIBUTION TO THE UN SDGS





# ENVIRONMENTAL PROTECTION POLICY

KEGOC JSC considers environmental protection activities as an integral part of its daily work. Responsible attitude to the environment is a key principle of KEGOC JSC Environmental Policy.

The environmental policy of KEGOC JSC is aimed at minimizing the negative impact on the environment, reducing the carbon footprint, increasing the level of environmental safety, responsibility for ensuring environmental protection during the development of the NPG of the Republic of Kazakhstan, energy conservation and rational use of natural and energy resources in the Company's activities. The Environmental Policy applies to all employees of KEGOC JSC, as well as to suppliers, employees of contractors and organizations providing services at the Company's facilities, on the terms specified in the concluded contracts. The management of KEGOC JSC assumes responsibility for the implementation of the obligations assumed in accordance with the Environmental Policy for continuous improvement and prevention of pollution, as well as compliance with applicable legislative and other requirements to which KEGOC JSC is related in terms of its environmental aspects. Each employee of the Company, as well as employees of contractors working in the interests of the Company, are familiar with the Environmental Policy of KEGOC JSC.

GRI 2-23, GRI 2-24

**The Company has implemented and successfully operates an Environmental Management System (EMS) based on the international standard ISO 14001.** The scope of application of the EMS covers the performance of the system operator's functions

in the power industry: provision of system services to wholesale market entities for the transmission of electricity through the National power grid, technical dispatch control, and balancing of electricity generation and consumption.

To confirm compliance with international environmental management standards, in 2023, the Company underwent a certification audit by the independent certification body MS CERTIFICATION SERVICES PRIVATE LIMITED (India). In 2024, a surveillance audit was conducted, which confirmed that the EMS remains compliant with ISO 14001 requirements.

To ensure effective EMS, KEGOC JSC developed its 2024 Register of Environmental Aspects. The identification process includes the analysis of all components of the Company's environmental impact (energy efficiency, biodiversity, water, soil, emissions, and waste). Management actions for these aspects are defined in the Company's Environmental Program for 2024.

## The following have been identified as priority environmental aspects for 2024:

- ◆ Potential PCB-containing waste, due to polychlorinated biphenyls (PCBs) being classified as hazardous substances under the Environmental Code of the Republic of Kazakhstan;
- ◆ Transformer oil and used transformer oil, due to the presence of oil-filled equipment at the Company's facilities.

Annually, all MES branches conclude contracts for both mandatory and voluntary environmental insurance.



As part of the "Strengthening the Power Grid of the Southern Zone of the Unified Power System of Kazakhstan" project, the required environmental permits for construction-phase impacts were obtained in accordance with the project design documentation.

To ensure compliance with environmental legislation and improve staff qualifications, in May 2024, corporate training was organized for MES branch employees responsible for environmental protection. The training was dedicated to amendments and updates to the Environmental Code of the Republic of Kazakhstan.

GRI 2-27

Throughout in 2024, KEGOC JSC was not subject to any financial or non-financial sanctions, nor were there any significant fines related to violations of environmental legislation or regulatory requirements.

GRI 2-25

In addition, no complaints were received from stakeholders regarding negative environmental impacts during the reporting period.

## INTERNATIONAL IEMA CERTIFICATION IN ENVIRONMENTAL MANAGEMENT

In September 2024, the Chief Environmental Manager completed a two-week training course under the IEMA (Institute of Environmental Management and Assessment) program. Upon successful completion of the modular examinations, an International Certificate in Environmental Management was obtained, confirming a high level of professional expertise in the field of sustainable natural resource management.





## EFFECT ON ATMOSPHERIC AIR

### GRI 3-3

KEGOC JSC actively works to minimize the impact of its operations on atmosphere air.

THE COMPANY USES EQUIPMENT AND TECHNOLOGIES THAT, IN MOST CASES, ARE NOT ASSOCIATED WITH DIRECT ATMOSPHERIC EMISSIONS, SUCH AS KEGOC JSC’S CORE ACTIVITY INVOLVES THE TRANSMISSION OF ELECTRIC POWER VIA HIGH-VOLTAGE TRANSMISSION LINES.

In accordance with the decision of the authorized environmental protection body, all branches of the MES are classified as Category IV facilities, for which emission standards are not subject to establishment.

Emissions of air pollutants are calculated using estimation methods, based on the number of operating hours of each unit of equipment and material consumption, in accordance with the official methodologies for calculating air pollutant emissions of the Republic of Kazakhstan.

### GRI 305-7

#### Air pollutant emissions, tonnes

Air pollutant emissions	2023	2024
Nitrogen oxides (NOx)	0.406	0.376
Sulfur dioxide (SOx)	0.059	0.051
Particulate matter (PM)	0.252	0.277
Carbon monoxide (CO)	0.290	0.243
Volatile organic compounds (VOCs)	0.179	0.146

Note: According to the Tax Code of the Republic of Kazakhstan, emissions from mobile sources are not subject to calculation; instead, the amount of fuel consumed is reported.

Due to a systematic approach to managing the technical condition of vehicles, KEGOC JSC achieved a reduction in atmospheric emissions in 2024.

To ensure uninterrupted operation of its infrastructure, KEGOC JSC utilizes motor vehicles and mobile units. In 2024, the Company conducted regular technical maintenance of its fleet to minimize air emissions. Vehicle inspections were also carried out to check the toxicity and opacity of exhaust gases released into the atmosphere.

### GRI 305-6

In its operations, the Company does not emit ozone-depleting substances that contribute to climate change.





## IMPACT ON WATER BODIES

GRI 3-3, 303-1, 303-2

KEGOC JSC does not use water in its technological processes, and the Company's total water consumption remains insignificant, having no material impact on water sources.

Water is consumed exclusively for domestic and sanitary needs and is sourced from municipal water supply systems and wells. No water is withdrawn from surface sources such as rivers, lakes, or other bodies of water.

Seven MES branches operate artesian water supply systems, with wells used in accordance with the permits for special water use. In line with the Water Code of the Republic of Kazakhstan, underground water monitoring is carried out on an ongoing basis at the well water intakes under contracts with specialized organizations.

Potential sources of water and soil pollution at the Company's facilities include:

- ♦ transformer oil used in oil-filled equipment;
- ♦ wastewater generated from domestic water use.

To minimize environmental impact, KEGOC JSC prioritizes environmentally friendly equipment when making procurement decisions. The Company regularly replaces oil circuit breakers with safer SF<sub>6</sub> and vacuum alternatives, contributing to the reduction of transformer oil use at MES branch substations.

The use of oil-free equipment increases reliability and fire safety while also eliminating the risk of underground water and soil contamination. Oil-filled equipment is equipped with oil catchment systems or containment trays to prevent oil from entering the soil. The integrity of oil containment bunds is regularly inspected.

GRI 303-3, SASB IF-EU-140A.1

IN 2024, THE VOLUME OF WATER EXTRACTED FROM WELLS AMOUNTED TO 37.97381 MEGALITERS. THE COMPANY DOES NOT USE RECIRCULATED WATER. NO WATER IS WITHDRAWN FROM SURFACE, MARINE, OR FORMATION WATER SOURCES.

Wastewater is not discharged onto the land surface.

### KEGOC JSC water withdrawal indicators, megaliters

By source type	2022	2023	2024
Groundwater (wells)	52.39	41.11	37.97
Freshwater (mineralization up to 1,000 mg/L)	-	22.76	27.88
Technical water (over 1,000 mg/L)	-	19.36	10.10
of them, in regions with water scarcity*	8.10	9.84	7.07
Third-party water (municipal supply and delivered)	87.31	65.86	69.23
Freshwater (mineralization up to 1,000 mg/L)	-	53.06	58.62
Technical water (over 1,000 mg/L)	-	12.80	10.60
of them, in regions with water stress*	9.68	9.83	9.02
Total	139.70	106.98	107.20
of them, in regions with water stress*	17.78	19.67	16.09

### KEGOC JSC water discharge indicators, megaliters

GRI 303-4

By type	2022	2023	2024
Third-party organizations (wastewater disposal)	-	49.54	46.46
Freshwater (mineralization up to 1,000 mg/L)	-	41.12	38.47
of them, in regions with water stress*	-	3.80	3.96
Technical water (over 1,000 mg/L)	-	8.43	7.99
of them, in regions with water stress*	-	0.95	1.08

\* the areas with water stress include the territories of the branches of KEGOC JSC of the Southern and Western MES, according to [the Water Stress Map](#).

### KEGOC JSC water consumption indicators, megaliters

GRI 303-5

Year	2022	2023	2024
Water withdrawal	139.70	106.98	107.20
of them, in regions with water stress*	17.78	19.67	16.09
Water discharge	-	49.54	46.46
of them, in regions with water stress*	-	4.75	5.04
Total water consumption	-	57.43	60.74
of them, in regions with water stress*	-	14.93	11.05

\* Water consumption is calculated as the difference between water withdrawal and water discharge.

## WASTE MANAGEMENT

### GRI 3-3, 306-1, 306-2

Production waste at KEGOC JSC is generated during the operation, maintenance, repair, and modernization of equipment.

Waste management is carried out in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan and the internal organizational Standard “Waste Management at KEGOC JSC.” Under these documents, all waste is classified as either hazardous or non-hazardous.

The transfer of hazardous waste to third-party organizations is carried out on the basis of a license authorizing the processing, neutralization, utilization, and/or disposal of hazardous waste. The list of waste types and their hazard classifications is regularly updated in the event of changes in composition, volume, or handling conditions.

As needed, MES branches develop or revise waste passports for each waste type. These passports include descriptions of the waste generation processes at the source, quantitative and qualitative characteristics, handling rules, monitoring methods, environmental impact, and information about the waste producers.

To ensure safe and separate storage of waste, dedicated waste storage sites have been designated at MES branches. Waste placement maps with explanatory notes have been developed for each facility, and the timely removal of waste for further utilization is ensured.

In 2024, work continued to identify PCBs in KEGOC JSC's substation equipment, in accordance with the Law of the Republic of Kazakhstan “On the Ratification of the Stockholm Convention on Persistent Organic Pollutants” and the Rules for the Handling of Persistent Organic Pollutants and Waste Containing Them (approved by the Order of the Minister of Environmental Protection of the Republic of Kazakhstan). MES branches updated PCB-containing equipment registers and submitted them to the territorial environmental protection authorities within the established deadlines.

In 2024, laboratory analyses of transformer oil for PCB content were conducted at the Akmola MES and Northern MES branches. No PCBs were detected based on the test results.

### Volume of hazardous and non-hazardous waste at KEGOC JSC, tonnes

#### GRI 306-3

Type	2023	2024
Hazardous waste	462.00	63.61
Non-hazardous waste	2,883.76	3,523.22
Total	3,345.765	3,586.831

### Total waste volume at KEGOC JSC, tonnes

Year	2020	2021	2022	2023	2024
Waste	5,117.11	4,326.09	2,635.99	3,345.77	3,586.831

### Waste diverted from disposal and directed to disposal, tonnes\*

#### GRI 306-4, 306-5

Type	Hazardous	Non-hazardous
<b>Recovery, including:</b>	<b>9.34</b>	<b>203.00</b>
preparation for reuse	8.64	202.95
recycling	0.70	0.05
other recovery operations	0	0
<b>Disposal, including:</b>	<b>3.21</b>	<b>1,276.19</b>
incineration	2.93	1.37
landfilling	0	1,274.82
other disposal operations	0.28	0
<b>Waste transferred to third-party specialized organizations with unknown final treatment method**</b>	<b>51.06</b>	<b>2,044.03</b>
<b>Total waste transferred to third-party specialized organizations</b>	<b>63.61</b>	<b>3,523.22</b>

\* In the reporting period, all waste was recovered or disposed of off-site.

\*\* In accordance with contracts, the waste was transferred to third-party specialized organizations in compliance with the applicable legislation of the Republic of Kazakhstan, which does not obligate KEGOC JSC to track the final treatment of waste handled by external service providers.

The total volume of waste transferred by the Company to third-party specialized organizations for recovery, disposal, and destruction under contractual agreements in 2024 amounted to 3,586.83 tonnes. Of this:

- ♦ the total volume of recovered waste (recycling, preparation for reuse, etc.) amounted to 1,207.66 tonnes;
- ♦ the total volume of disposed waste (incineration, landfilling, etc.) amounted to 2,379.17 tonnes;
- ♦ the total volume of waste transferred to third-party organizations with an unknown final treatment method was 2,095.09 tonnes.

Waste transfer was carried out in accordance with the applicable legislation of the Republic of Kazakhstan, which does not place an obligation on KEGOC JSC to track the final treatment of waste handled by service providers. However, in line with its commitment to enhanced environmental responsibility and sustainable development, and in adherence to ESG principles, the Company is working to ensure transparency and control at all stages of the waste management process. To this end, KEGOC JSC has initiated the practice of requesting waste processing reports from its service providers, including information on treatment methods and final disposal.



ENERGY EFFICIENCY

GRI 3-3

KEGOC JSC implements a set of measures aimed at improving energy efficiency and the rational use of resources. The key priorities in this area include reducing the consumption of fuel and energy resources, lowering energy costs for the internal needs of facilities, minimizing technological losses during electricity transmission through the NPG, and developing an energy metering and control system based on metering devices and data analysis.

11,369.62  
thousand GJ

total consumption of fuel and  
energy resources in 2024



Consumption of fuel and energy resources in 2024

GRI 302-1

	Unit	Consumption (physical units)	Consumption (thousand GJ) <sup>1</sup>
Total electricity	thousand kWh	3,095,260.48	11,142, 93772
of which from renewable energy sources	thousand kWh	462,748.75	1.66590
Heat energy	Gcal	21,352.531	89.39878
Fuel, including:		-	137.28392
motor gasoline	tonnes	1,007.21	44.01529
diesel fuel	tonnes	2,112.58	89.78469
natural gas	thousand m³	95.07	3.21333
liquefied natural gas	tonnes	5.88	0.27061
Total			11,369.62043

<sup>1</sup> The conversion of fuel and energy resource consumption volumes into joules was performed using the Methodology for Calculating Greenhouse Gas Emissions and Removals, approved by Order No. 9 of the Minister of Ecology and Natural Resources of the Republic of Kazakhstan dated 17 January 2023, and the Methodology for Compiling the Fuel and Energy Balance and Calculating Certain Statistical Indicators Characterizing the Energy Sector, approved by Order No. 160 of the Chairman of the Statistics Committee of the Ministry of National Economy of the Republic of Kazakhstan dated 11 August 2016.

In 2024, the total consumption of fuel and energy resources increased by 551,803.99 GJ compared to 2023, mainly due to the growth in electricity consumption as a result of increased volumes of electricity transmission through the NPG.

KEGOC JSC energy intensitiy

GRI 302-3

Unit	2020	2021	2022	2023	2024
thousand GJ per thousand KZT revenue	0.058	0.060	0.048	0.043	0.036

KEGOC JSC Electricity consumption

GRI 302-1

Year	2020	2021	2022	2023	2024
Unit	mIn kWh				thousand GJ
Energy consumption	3,059.92	2,824.90	2,950.28	3,095.26	11,142.93772
Including RES	32.41	14.23	205.7*	462.74875*	1.66590

\* In connection with amendments to the Law of the Republic of Kazakhstan “On Electric Power Industry” introduced in 2023, since 1 July 2023, the Single Electricity Purchaser has been purchasing electricity from all power generation companies connected to the NPG, including RES. Therefore, the indicator for 2023 and 2024 was calculated based on the share of electricity generated from RES (as per GRI 302 terminology) in the total volume of electricity production.

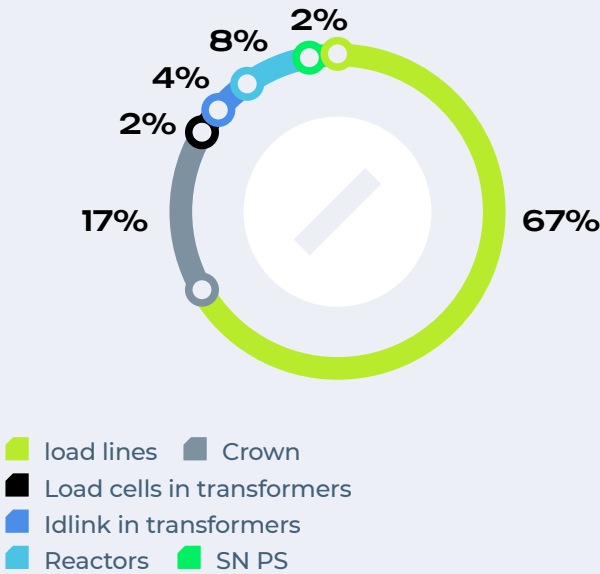
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The greatest effect, in terms of reducing energy consumption, is provided by measures to reduce the technological consumption of electric energy for transmission over electric networks.

The UPS of the Republic of Kazakhstan is mainly characterized by the concentration of powerful energy sources in the Northern zone and the presence of long (about 1,000 km) transit power lines (the main directions of transit North — South of the Republic of Kazakhstan, Pavlodar region — Aktobe region) — this is due to the large territory of the country and has a significant impact on the level of technological electricity consumption (technical losses).

Technical losses in the KEGOC JSC network also depend on the operating modes of the energy systems of neighboring countries (transit, export and import of electricity) and climatic conditions.

Structure of KEGOC JSC’s electricity losses for 2024



In 2024, the technological electricity consumption in KEGOC JSC networks amounted to 3.069 billion kWh, which is equivalent to 5% of the total electricity transmitted to the grid.

Technological electricity consumption refers to natural electricity losses that occur due to physical processes in conductors and electrical equipment during transmission across the grid. The Company's primary objective in this area is to reduce actual loss levels to an optimal value through the planning and implementation of technical and organizational measures.

Changes in climatic conditions may become a risk factor contributing to excessive electricity losses during transmission. In this regard, KEGOC JSC takes into account climate factor analysis and the dynamics of actual electricity losses when developing and implementing loss reduction measures and climate risk mitigation efforts.

As a result of measures taken to optimize the operating modes of the UPS of the Republic of Kazakhstan, electricity consumption was reduced by 5.042 million kWh in 2024, exceeding the 2023 indicator (4.058 million kWh).

The effect of measures to reduce electricity losses

Activity	GRI 201-2, 302-4, 302-5					
	2022		2023		2024	
	mln. kWh	GJ	mln. kWh	GJ	mln. kWh	GJ
Disconnecting lines in low-load mode	0.260	936	0.180	648	0.178	641
Switching off power transformers in low-load mode	3.672	13,219	3.878	13,961	4.864	17,510
Total of KEGOC JSC	3.932	14,155	4.058	14,609	5.042	18,151

In accordance with the requirements of the Law of the Republic of Kazakhstan "On Energy saving and energy efficiency improvement," KEGOC JSC initiated an energy audit involving an external specialized organization. Based on the audit results, an Energy Saving and Energy Efficiency Improvement Action Plan for 2021–2025 was approved, providing for the potential reduction of energy resource consumption by 4,977.522 tonnes of oil equivalent (t.o.e.).

As part of the implementation of the Action Plan, the following energy efficiency measures were carried out:

- ◆ modernization of lighting systems at substations and inside buildings;
- ◆ installation of energy-efficient electric boilers;
- ◆ cleaning of heating system pipelines and water treatment systems;
- ◆ replacement of outdated exterior doors, gates, and window units;
- ◆ installation of radiator thermostats and temperature controllers at facilities with electric heating.

As a result of the measures implemented under the Plan, energy savings in 2024 amounted to 43,541,85 GJ, which corresponds to greenhouse gas emissions of 9,045.42 tonnes of CO<sub>2</sub> equivalent.

Effect of energy saving and energy efficiency measures

	GRI 305-5		
	2022	2023	2024
Reduction in energy consumption, GJ	11,621.27	35,470.78	43,541.85



61,693.05 GJ

energy savings in 2024



IN 2024, THE IMPLEMENTATION OF THE ENERGY SAVING AND ENERGY EFFICIENCY IMPROVEMENT ACTION PLAN FOR 2021–2025 EXCEEDED THE PLANNED TARGETS, RESULTING IN A MORE SUBSTANTIAL REDUCTION IN ENERGY CONSUMPTION.



## IMPACT ON BIODIVERSITY

GRI 3-3, 2-26, 304-1, 304-2

As a transmission company and system operator, KEGOC JSC does not have a significant direct impact on flora and fauna. Nevertheless, the Company places great importance on minimizing potential impacts on ecosystems and biodiversity. To this end, the Biodiversity Policy was developed and implemented. It applies to all KEGOC JSC employees, as well as to suppliers, contractors, and service providers operating at the Company's facilities in accordance with the terms of relevant contracts.

The main objective of KEGOC JSC Biodiversity Policy is to prevent and minimize adverse impacts of the Company's operations on ecosystems and biodiversity within KEGOC JSC areas of influence.

The Company assesses environmental and biodiversity-related risks at all stages of project implementation, including planning, construction, and post-project monitoring. Where significant impacts are identified, biodiversity management plans are developed.

KEGOC JSC adheres to the principles of sustainable development and avoids placing facilities within protected areas. Modern technical solutions are used during the design of new facilities to minimize environmental impact.

In addition, the Company informs stakeholders about potential impacts of major projects, engages with NGOs on environmental protection initiatives, and conducts training and awareness-raising activities to enhance environmental knowledge among employees and partners.

When implementing investment projects, KEGOC JSC applies a comprehensive approach to nature conservation and biodiversity protection, including:

- ◆ Environmental risk assessments at all stages of the project life cycle;
- ◆ Avoidance of OHTL routes and SS locations in residential areas, zones of prospective development, specially protected natural territories, cultural heritage sites, forests, water protection zones, and other sensitive areas.

Typically, OHTL routes are designed to pass through steppe and semi-desert zones, which helps reduce impacts on biodiversity and minimize socio-environmental conflicts.

KEGOC JSC carries out its activities in accordance with the principles of environmental legislation of the Republic of Kazakhstan, in particular the principle of accessibility of environmental information and the principle of public participation. When passing the stage of consideration of any construction and reconstruction projects, a mandatory stage is to hold public hearings or discussions on EIA projects.

During the EIA, all processes of possible significant environmental impacts in the implementation of the planned activities are taken into account, including:

- ◆ effect on atmospheric air,
- ◆ reservoirs and groundwater,
- ◆ terrain,
- ◆ conservation of biodiversity, wildlife.

Identification and assessment of project risks are carried out on an ongoing basis and at all stages of project implementation. To analyze the risks of project implementation, PESTEL analysis is used, including analysis of social and environmental risks. The results of the conducted EIA, including on biodiversity, are taken into account and the option that causes the least harm to the environment is adopted.

### IMPACT AND MEASURES FOR THE PROTECTION OF ORNITOFAUNA

KEGOC JSC contributes to the preservation of ecosystems and traditional habitats within transmission line rights-of-way and around substations.

According to international research, low-voltage power lines (0.4–10 kV) pose a high risk of electrocution to birds due to short distances between grounded and energized components, which can lead to short circuits upon simultaneous contact.

In contrast, 99.2% of KEGOC JSC transmission lines are high-voltage lines (110 kV and above), where the minimum distance between grounded and energized parts is at least 1.5 meters. This exceeds the average wingspan of most bird species and thus virtually eliminates the risk of electrocution.

To mitigate the risk that transmission lines pose to birds, the Company implements a range of measures based on international research and its own operational experience:

- ◆ installation of bird protection devices: over 11,000 bird-safe devices have been installed at potential perching sites on crossarms and outdoor switchgear portals across KEGOC JSC facilities. These devices prevent birds from landing on elements of transmission lines and substations. Additional devices include innovative solutions proposed by employees, such as rotating attachments mounted at the edge of concrete pole crossarms to deter birds from perching.
- ◆ use of visual and acoustic deterrents: noise and visual deterrents that are activated by wind are used to reduce risks for birds. These also help scare birds away during periods of high activity, such as seasonal migrations.
- ◆ Educational programs and collaboration with ornithologists: the Company continuously monitors biodiversity preservation technologies, reviews the experiences of peer companies, and maintains communication with conservation organizations. For example, in December 2024, KEGOC JSC participated in the conference “Birds and Energy: Challenges and Solutions” organized by the Public Fund Center for Biodiversity Research and Conservation (BRCC Research & Conservation).

These additional measures enhance bird safety by reducing exposure to potential threats and contribute to a more harmonious coexistence between infrastructure and biodiversity.

# CLIMATE CHANGE

Climate change and the urgent need to transition to a low-carbon development model represent one of the key challenges of our time. Global warming, driven by anthropogenic greenhouse gas emissions, is recognized as a fact by the scientific community. According to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC, 2023), the decade from 2011 to 2020 was the warmest in the last 125,000 years. Climate change is already having significant impacts on water resources, food security, public health, and economic activity.

**THE WORLD METEOROLOGICAL ORGANIZATION (WMO) FORECASTS WITH 98% PROBABILITY THAT THE PERIOD 2023–2027 WILL BECOME THE HOTTEST ON RECORD SINCE THE BEGINNING OF METEOROLOGICAL OBSERVATIONS. THESE TRENDS INCREASE ECOSYSTEM VULNERABILITY AND REQUIRE URGENT AND LARGE-SCALE ADAPTATION AND EMISSION REDUCTION MEASURES.**

Alongside risks, the green transition opens substantial economic, investment, and social opportunities, fostering the development of a more sustainable and inclusive growth model. KEGOC JSC recognizes the critical role of the energy sector in achieving the global carbon neutrality goals set forth in the Paris Agreement and contributes to this process through its investment and operational activities.

Understanding the risks and opportunities related to climate change is increasingly important for stakeholders, including investors, regulators, and partners. In response, in 2024 KEGOC JSC developed and approved its Climate program for 2025-2060 (Climate program). The Climate program includes a comprehensive qualitative and quantitative assessment of climate risks and opportunities, incorporating scenario modeling, vulnerability analysis, and evaluation of financial impacts on the Company's operations.

## CLIMATE CHANGE MANAGEMENT

### BOARD OF DIRECTORS' OVERSIGHT OF THE CLIMATE AGENDA

Climate change issues occupy a central place in KEGOC JSC's strategic management and are integrated at all levels of corporate governance, starting from the Board of Directors and its committees. In 2024, the climate agenda was addressed through regular Board meetings and strategy sessions, including the annual approval of climate-related KPIs, as well as quarterly monitoring of the Plan's ESG and oversight of climate risk management.

The Board of Directors defines the Company's strategic priorities, including climate goals, approves the Annual Report containing the Sustainability Report, and sets target indicators for which the Management Board is accountable. An important function of the Board is the annual evaluation of the Executive Management's performance, including based on functional KPIs.

The work on climate matters is supported by specialized Board committees:

- ◆ The Strategy and Sustainable Development Committee provides recommendations on climate issues;
- ◆ The Audit Committee assesses the quality of climate-related disclosures and risk management;
- ◆ The Nomination and Remuneration Committee considers the achievement of KPIs in evaluating Executive Management effectiveness.

The Board of Directors also ensures the availability of ESG and climate competencies. In 2024, the Board members attended a number of training sessions involving internal and external experts on climate risk management, new international and Kazakhstani regulatory ESG requirements, key trends in business adaptation to climate change, climate policy and sustainable development.



ROLE OF MANAGEMENT BOARD IN CLIMATE GOVERNANCE

The Management Board of KEGOC JSC implements the strategic goals determined by the Board of Directors, including climate change objectives, approves the Climate program, is responsible for its implementation, climate risk management and coordination of actions of all subdivisions within the framework of the unified ESG agenda.

The Coordinating council on sustainable development and the IMS, operating under the Management Board, ensures:

- ◆ integration of climate aspects into business processes and operational decisions;
- ◆ development of internal programs and plans aimed at reducing climate risks;

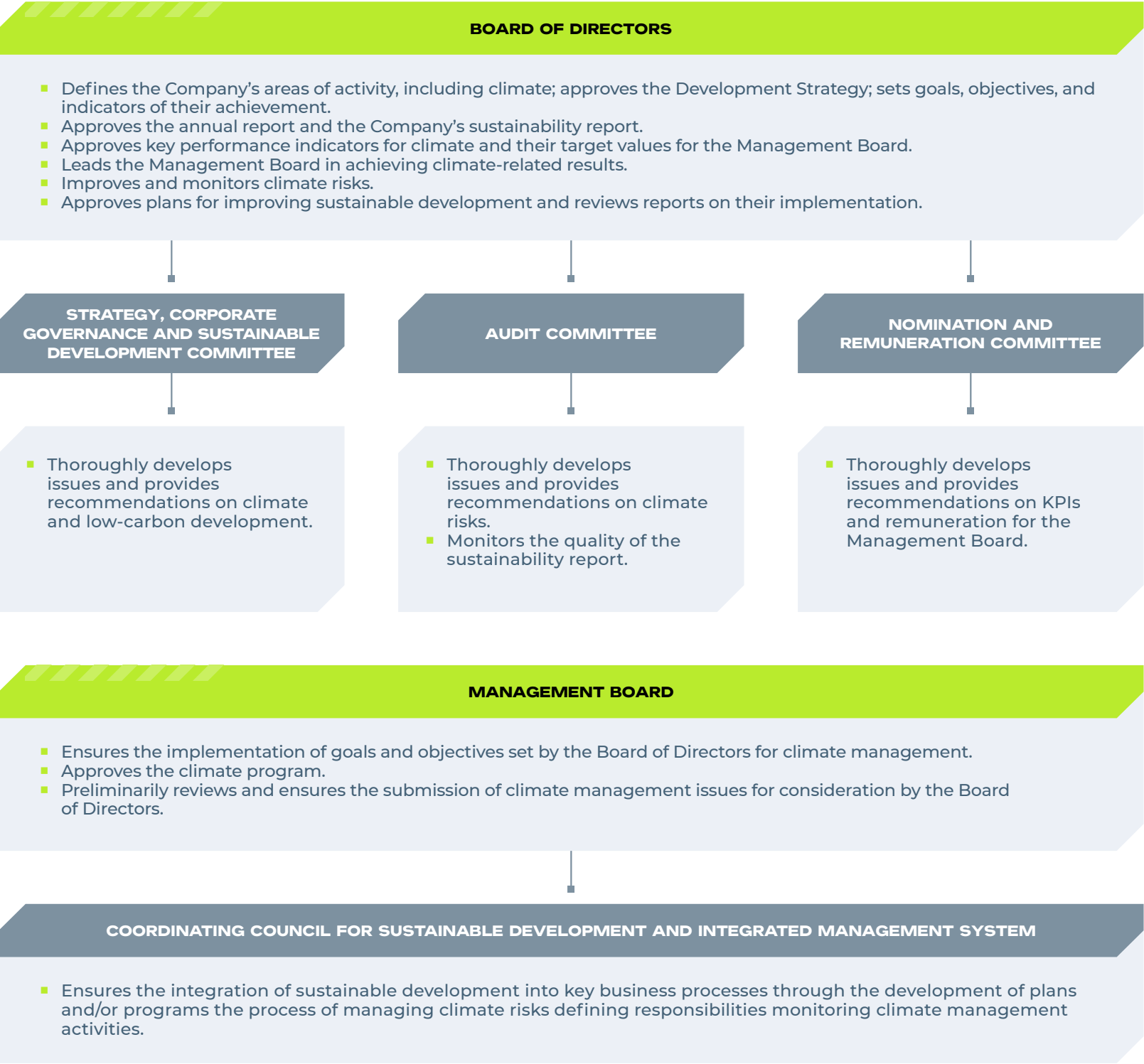
- ◆ assessment of climate challenges and opportunities;
- ◆ allocation of responsibilities and monitoring of implementation.

Climate risk management processes are based on the principles of double materiality, taking into account stakeholder expectations. Significant risks and opportunities are identified in the course of dialog with investors and partners, taking into account TCFD recommendations.

The Company acknowledges the need to adapt to evolving regulatory environments and reporting requirements and regularly updates its climate management approaches in response to new expectations and challenges.



Climate change governance structure at KEGOC JSC



# CLIMATE CHANGE STRATEGY

KEGOC JSC consistently integrates the climate agenda into its strategic and operational management, recognizing the importance of sustainable development in the energy transition. The Company's climate action is based on internal documents such as the Climate Programme, as well as KEGOC JSC Low Carbon Development Programme 2031 and Vision for Carbon Neutrality 2060 (LCDP), covering decarbonization, energy saving and climate risk management goals.

Specifically, the sustainable development and carbon footprint reduction targets are embedded in the LCDP, developed in alignment with Kazakhstan's National Strategy for Carbon Neutrality and the Low-Carbon Development Concept of Samruk-Kazyna JSC. The goal of the LCDP is to formalize approaches and tools that ensure the reduction of the carbon footprint through:

- ◆ assessment of decarbonization potential considering production specifics;
- ◆ identification of priority areas and measures for emission reduction;
- ◆ forecasting of CO<sub>2</sub> emissions up to 2060;
- ◆ raising climate awareness among employees and disseminating global practices in emission reduction.

Key objectives include reducing the consumption of fuel and energy resources, improving energy accounting and monitoring systems, and implementing resource-saving technologies.

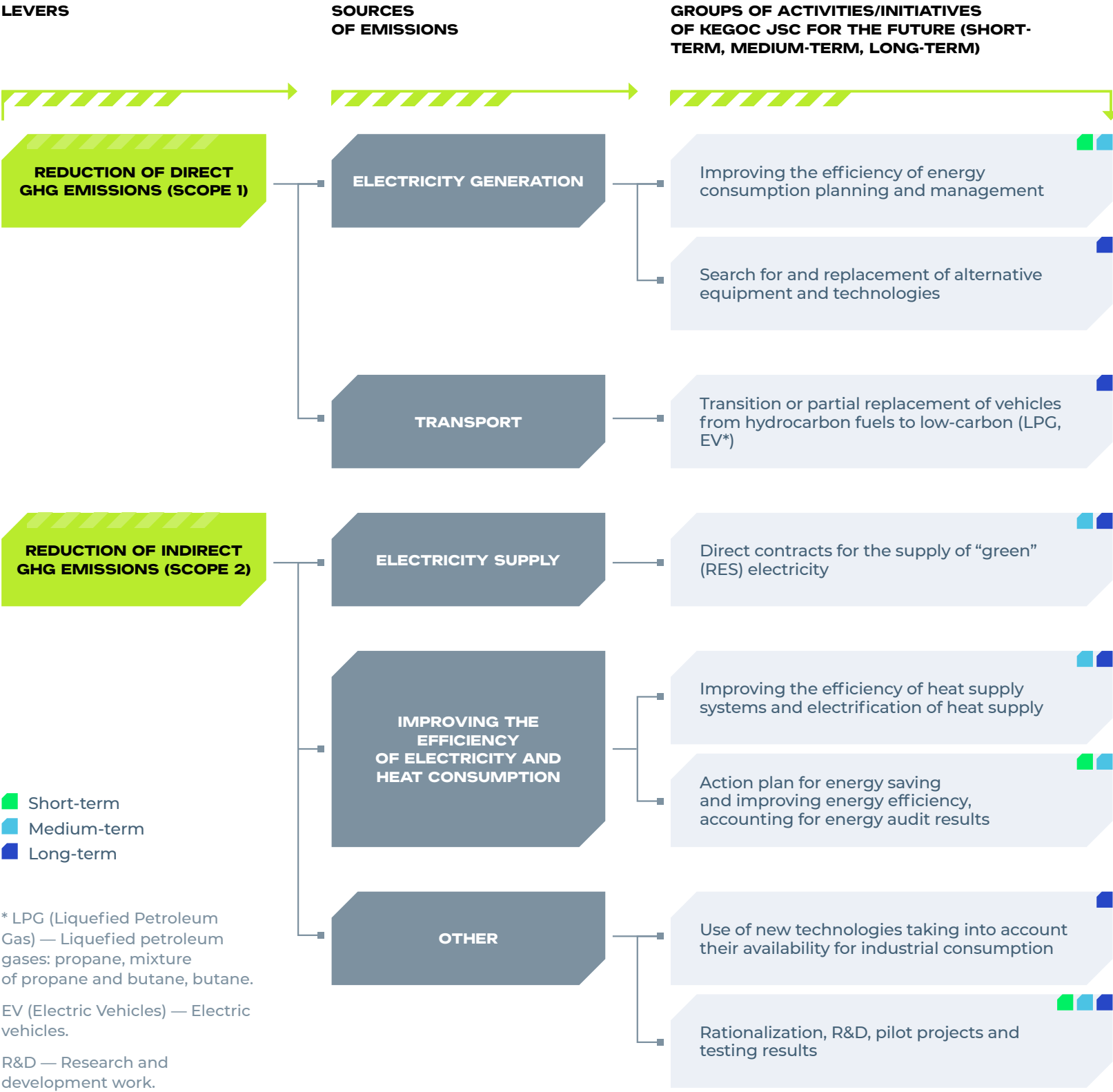
The Company takes into account its role as a system operator and electric grid operator, which limits the potential for directly implementing renewable energy projects. However, KEGOC JSC actively participates in R&D

and considers the deployment of pilot solutions such as energy storage systems (ESS). In 2024, the implementation of the pilot project "deployment of electricity storage systems in the unified power system (UPS) of Kazakhstan" continued. The project aims to study the impact of energy storage systems on the regulation of the UPS during the integration of renewables, in cooperation with China Power International Development Limited, China Power International Holding Limited, and the Renewable Energy Association of Kazakhstan.

The transition to low-carbon development includes the following measures:

- ◆ gradual replacement of internal combustion engine vehicles with electric vehicles (Scope 1);
- ◆ increase in the share of procured "green" electricity (Scope 2);
- ◆ development of digital solutions (Smart Grid), conducting energy audits, equipment modernization, and promoting resource efficiency (Scope 1 and Scope 2).
- ◆ implementation of current green projects (Scope 2): Unification of the energy system of Western Kazakhstan with the UPS of Kazakhstan. Construction of power grid facilities; Strengthening of the power grid of the Southern zone of the UPS of the Republic of Kazakhstan;
- ◆ implementation of promising green projects (Scope 2): Strengthening of the external power supply scheme of Astana city. Construction of power grid facilities. Enhancement of transit potential and transmission capacity of the UPS of Kazakhstan; Construction of 500 kV overhead line Karaganda — Zhezkazgan — Kyzylorda — Shymkent; Strengthening of the Western energy hub. Construction of 500 kV overhead line Karabatan — Beineu — Mangystau; Unification of the Western zone with the UPS of the Republic of Kazakhstan. II stage).

## Key decarbonization levers by emission sources at KEGOC JSC





REDUCTION OF SCOPE 1 EMISSIONS:

- stationary source emissions: continuous monitoring of fuel combustion levels and the technical condition of equipment is carried out, as well as its upgrading in domestic and international markets. The widespread implementation of alternative technologies that are potentially available and effective will contribute to emission reductions, especially in emergency power supply situations.
- mobile source emissions: in 2030–2031, it is planned to replace 19 passenger vehicles with internal combustion engines (out of 115 units) with electric vehicles in the Akmola and Almaty MES branches and the Executive Directorate for the transportation of production and administrative personnel. As a result of the implemented measures, a reduction in direct CO<sub>2</sub> emissions by 2% in 2030 and by 3% in 2031 is expected.

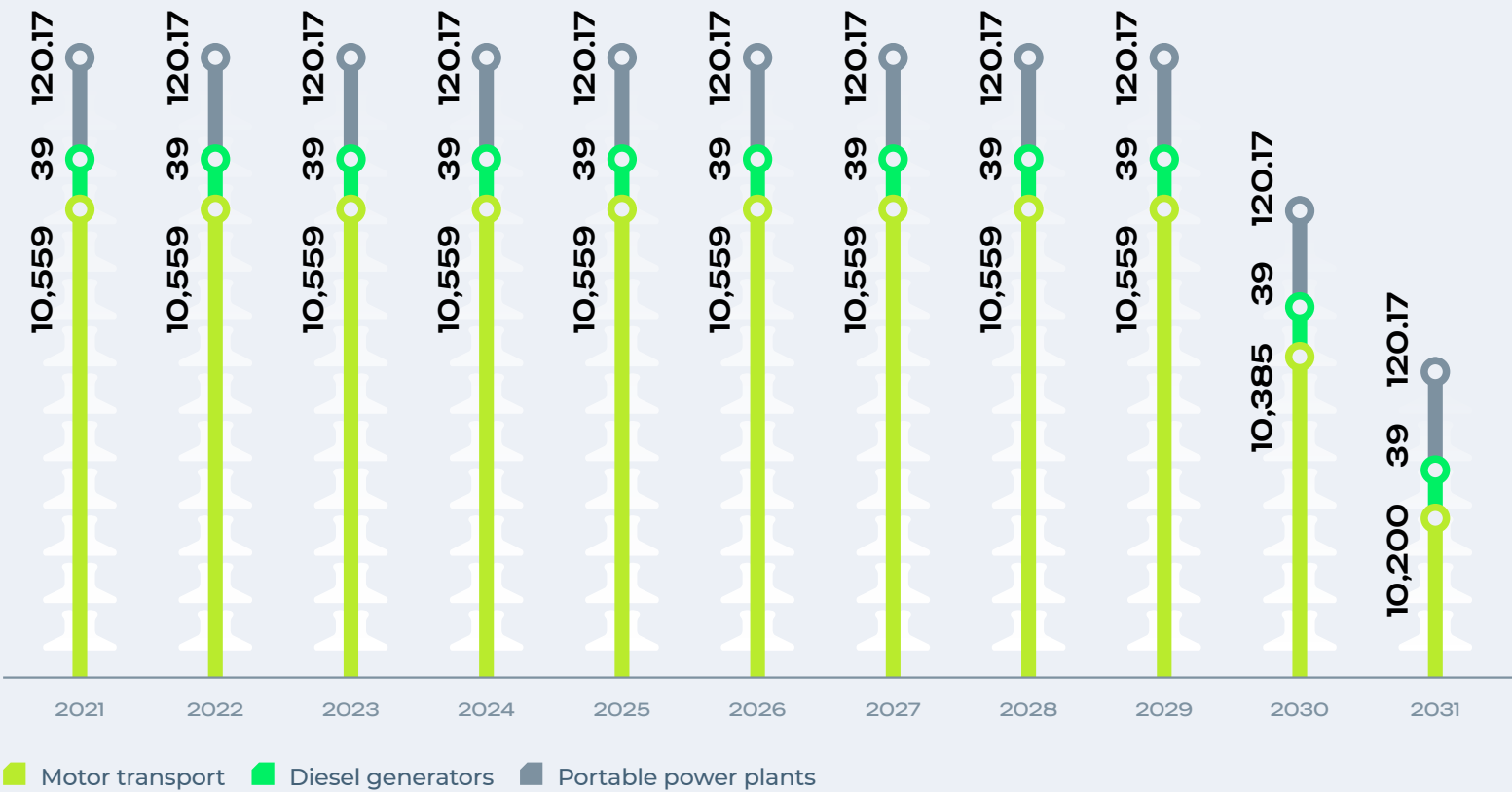
REDUCTION OF SCOPE 2 EMISSIONS:

The Company purchases electricity for technological purposes, including electricity to compensate for technological electricity consumption during its transmission through the NPG of the Republic of Kazakhstan, as well as for economic needs, from the Single Buyer (SFCS of RES LLP), which in turn purchases electricity from all EPOs, including electricity generated by renewable energy facilities. By the end of 2024, the share of RES generation in the total generation volume amounted to 6.4%.

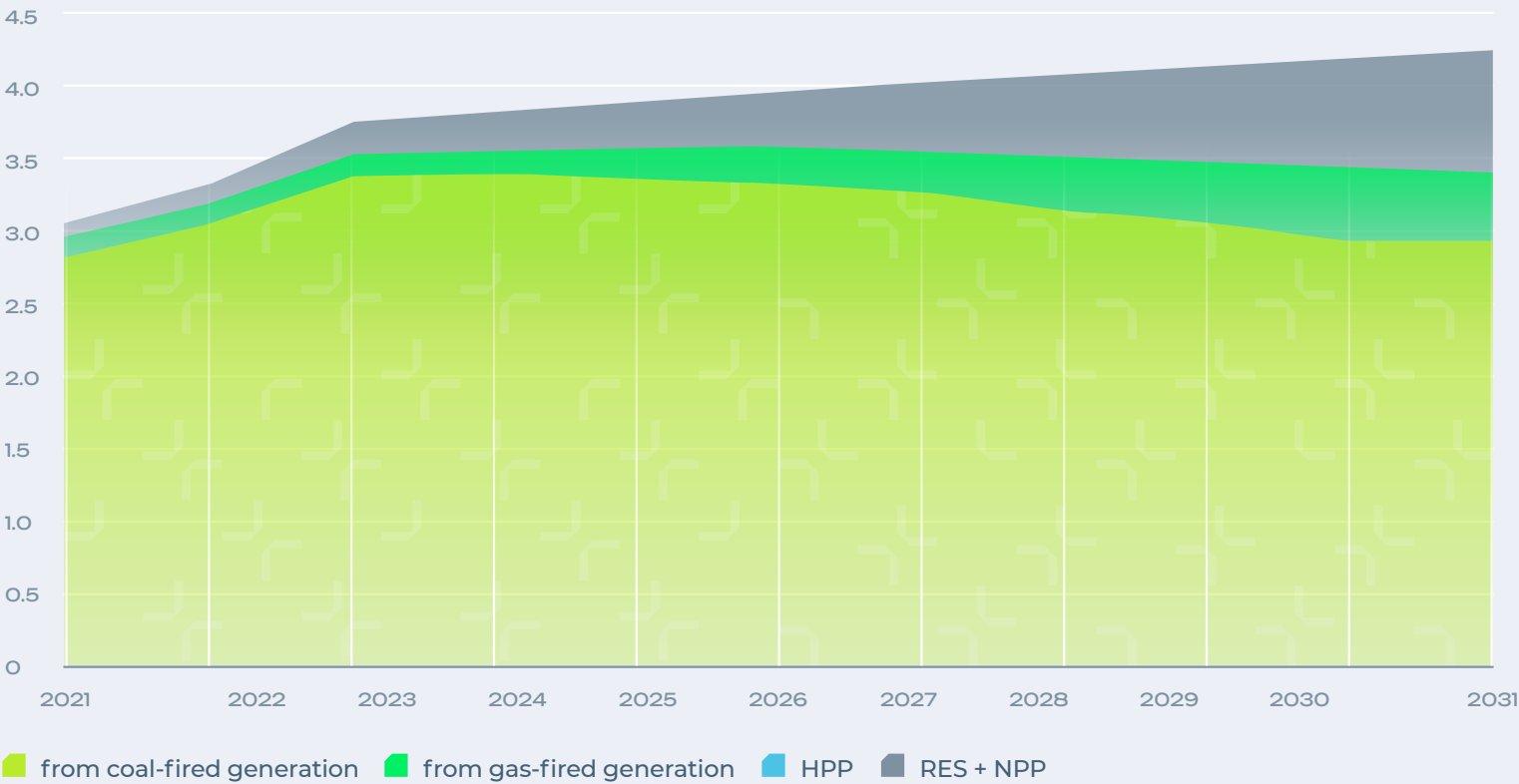
The projected share of green energy in the volume of technological electricity consumption will amount to 7% by 2025, 12% by 2028, and 19% by 2032.

The Company is actively involved in improving national legislation, implementing projects for the development of NPG and ensuring conditions for the connection of RES, developing and implementing projects in the field of energy saving and energy efficiency.

Expected direct emissions of KEGOC JSC until 2031, tons of CO<sub>2</sub>



Planned volumes of electricity purchases for compensation of technological consumption (Carbon Neutrality Scenario)



The main priorities of the energy efficiency and energy saving policy include:

- ♦ optimization of energy resource accounting and management systems;
- ♦ justification and standardization of target consumption indicators;
- ♦ improvement of staff competencies in energy saving;
- ♦ cooperation with external partners in implementing innovative energy-saving solutions;
- ♦ employee engagement in generating ideas and initiatives to reduce resource consumption;
- ♦ conducting energy audits and implementing corresponding measures;
- ♦ modernization of equipment with transition to energy efficient solutions, etc.

In the short and medium term, the Company is focused on implementing the Energy Saving and Efficiency Improvement Plan for 2021–2025. Priority areas include modernization of lighting systems, installation of energy-efficient boilers, replacement of windows

ASSESSMENT OF CLIMATE RISKS AND OPPORTUNITIES

Climate modeling covers the period until 2060, selected in accordance with the Strategy for Achieving Carbon Neutrality of the Republic of Kazakhstan. Financial modeling of climate risks was carried out for four scenarios (RCP2.6, RCP4.5, RCP8.5, NZE 2050). It covers key aspects: revenue, OPEX, CAPEX, EBITDA, and operating profit. The analysis demonstrated the high resilience of the Company under all scenarios, including the stress scenario RCP8.5. The models took into account possible changes in regulation, electricity prices, climate parameters, and infrastructure requirements.

For each scenario, financial indicators were extrapolated to 2060 based on current data on income, expenses, capital expenditures, and EBITDA. Financial assessments are based on the full income and expense model of KEGOC JSC, taking into account climate impacts on operational and investment flows.

and doors, installation of thermostats. The expected effect is a reduction in energy resource consumption by 5,000 toe.

Further development involves regular energy audits and updating five-year programs. As part of digital transformation, KEGOC JSC will implement IoT technologies, AI, and cloud solutions to enhance efficiency. In the field of R&D, the focus is on reducing technological consumption, including through robotic cleaning of wires on the 500 kV North–South overhead line. The Company intends to form a project portfolio for the medium term with the possibility of financing through the R&D fund of the “Samruk-Kazyna” group.

Stable growth of the share of electricity from renewable energy sources, as well as energy saving and energy efficiency improvement measures enable the Company to plan a gradual increase in the volume of electricity purchased from renewable energy sources and to achieve the Scope 2 emission reduction target of 20% by 2031.

The Company uses scenario analysis to assess climate risks and opportunities:

- ♦ The “Carbon Neutrality” scenario assumes an increase in the share of RES, emission reduction, and the implementation of energy-efficient technologies.
- ♦ The “Business as Usual” scenario demonstrates a potential increase in costs and a decrease in competitiveness in the absence of climate reforms.

KEGOC JSC considers climate risks and opportunities over various time horizons:

- ♦ **Short-term (until 2025):** implementation of pilot projects such as Smart Grid, execution of the Energy Saving Plan, implementation of monitoring.
- ♦ **Medium-term (until 2031):** achievement of target indicators for reducing Scope 1 and Scope 2, enhancement of energy system resilience.
- ♦ **Long-term (until 2060):** achievement of carbon neutrality, full adaptation of infrastructure.

CLIMATE RISK ASSESSMENT

Climate risks assessment covers all links in KEGOC JSC’s value creation chain. Vulnerability to temperature and flood impacts is analyzed at the stages of design of construction and modernization of NPC, power transmission, and generation forecasting, extreme weather is analyzed at the stage of equipment operation, dispatching and balancing, and emissions from stationary and mobile sources are monitored. At the consumption stage, indirect emissions from the use of electricity for technological needs are considered. In the innovation and R&D block, technological solutions are developed, including Smart Grid and PSS. At the supply management

stage, suppliers are assessed according to ESG criteria, including environmental responsibility and compliance with sustainable development standards.

The assessment of physical climate risks at KEGOC JSC was conducted using a scenario-based approach through 2060 and covers key climate parameters such as temperature, floods, and extreme weather events, with a focus on the vulnerability of critical assets. The analysis is based on RCP scenarios and reflects potential consequences for the Company’s infrastructure and financial indicators.

List of indicators relevant for climate change analysis of KEGOC JSC



TEMPERATURE

Type

Chronic

Indicator/unit of measurement

Annual minimum of daily minimum temperature (°C)

Relevance for exposure risk analysis

Low temperatures may lead to equipment freezing, increased heating costs, and icing of transmission lines.

Type

Chronic

Indicator/unit of measurement

Annual maximum of daily maximum temperature (°C)

Relevance for exposure risk analysis

Higher temperatures can increase electricity consumption, overheat equipment, reduce efficiency, and accelerate wear.



FLOODS

Type

Acute

Indicator/unit of measurement

Flooding (m)

Relevance for exposure risk analysis

Floods can cause short circuits, damage substations, and lead to prolonged power outages.



ЭКР.ЕМАЛЬНАЯ ПОГОДА

Type

Acute

Indicator/unit of measurement

Maximum wind speed (m/s)

Relevance for exposure risk analysis

Strong winds may damage overhead power lines, break poles, and cause outages due to fallen trees.





TEMPERATURE

Rising average and extreme temperatures are recognized as one of the key climate challenges. According to models, the average air surface temperature may increase by up to +58.5% by 2060 under the RCP8.5 scenario compared to the baseline. Minimum temperatures also rise 3–4 times, indicating a sharp decline in cold periods. The most significant temperature increase is observed in the Turkestan region, where by 2060 the maximum temperature may reach 22.99 °C and the minimum — 9.28 °C, exerting pressure on transformer cooling systems, accelerating equipment aging, increasing the risk of insulation failure, and reducing transmission line capacity due to overheating.



FLOODS

Floods pose the greatest threat in the Atyrau and Mangystau regions. By 2060, under the RCP8.5 scenario, the average flood level may reach 0.7 m in Mangystau. This creates a risk of inundation of distribution points and substations, especially in low-lying areas. Potential damages include prolonged energy transmission disruptions, equipment damage, and increased emergency recovery costs.



EXTREME WEATHER

Despite an overall decrease in maximum wind speed of up to 2.6%, wind loads remain high in the northern and central regions. For example, in the North Kazakhstan region, even under RCP8.5, the maximum wind speed by 2060 is projected at 39.52 m/s. This necessitates regular monitoring of transmission line conditions, implementation of damping devices, and reinforcement of structures to prevent breakages and deformations.

The region’s most vulnerable to physical climate risks are Turkestan, Almaty, Karaganda, Atyrau, and Mangystau. These areas host key Company assets that are exposed to significant climate stress. Considering the specifics of the facilities, a list of priority adaptation measures has been developed for each region.

As part of climate modeling, KEGOC JSC quantitatively assessed the potential financial impacts of physical climate risks through 2060. The analysis covers two key areas: risks arising from changes in climate parameters (temperature, floods, extreme winds) and the costs of adaptation measures aimed at improving infrastructure resilience.

Without adaptation measures, cumulative financial losses from physical climate impacts (equipment overheating, substation flooding, wind damage) may reach KZT 261 billion by 2060. The cost of implementing adaptation measures (infrastructure reinforcement, monitoring implementation, cooling system modernization, deployment of intelligent control systems) is estimated at over KZT 314 billion for the period from 2030 to 2060.

ASSESSMENT OF TRANSITION RISKS

KEGOC JSC considers transition risks as an important focus area in climate analysis. Particular attention is paid to the potential consequences of changes in public policy, regulatory requirements, technological standards, and market conditions amid the global energy transition.

As part of the climate program development, a financial assessment was conducted on the impact of key transition risks on the Company’s operational and investment activities through 2060. The assessment was carried out under four climate scenarios (RCP2.6, RCP4.5, RCP8.5, and NZE 2050), taking into account parameters such as revenue, operating and capital expenditures, EBITDA, and operating profit.

The most significant risks are associated with stricter energy efficiency standards, rising electricity costs, and the need to comply with new ESG requirements. Although KEGOC JSC is not a subject to emissions quotas and does not directly participate in the carbon market, regulatory changes affect the cost of purchased energy and drive the need for large-scale infrastructure modernization.

The analysis determined that in order to ensure compliance with new standards and improve energy efficiency, investments of approximately KZT 90 billion will be required by 2060. In the absence of such measures, the financial impact may reach KZT 138 billion starting from 2030. These estimates account for both direct costs of technological upgrades and indirect expenses related to increased tariff pressure and regulatory constraints.

One of the priority measures under the strategy is the implementation of advanced digital solutions and smart grid technologies aimed at improving transparency and efficiency in electricity transmission. These technologies help reduce operating costs, enhance power supply reliability, and ensure compliance with growing climate expectations from investors and regulators.





CLIMATE OPPORTUNITIES ASSESSMENT

KEGOC JSC considers climate change not only as a source of risks, but also as a significant opportunity to improve sustainability, technological modernization and investment attractiveness. The assessment of climate opportunities covers such areas as implementation of energy efficient solutions, application of intelligent energy management systems and implementation of pilot projects in the field of energy storage.

One strategically important opportunity is the development of smart infrastructure. A pilot project to install a 5 MW PSS in southern Kazakhstan will explore the potential to increase system

flexibility, integrate renewables and improve peak load management. In the long term, this is the basis for scalable solutions for modernization of the energy system at the national level.

In addition, KEGOC JSC pays special attention to energy efficiency improvement within the framework of the existing energy saving programs, infrastructure modernization and implementation of digital solutions. The Company has a system in place to motivate personnel to put forward rationalization proposals, and R&D activities are aimed at developing solutions to reduce technological losses in energy transmission.

According to the calculations of the Climate program, the potential annual economic benefit from leveraging climate opportunities is estimated at KZT 5–10 billion per year starting from 2031. These benefits are driven by reductions in technological electricity losses, lower operational costs, improved energy efficiency, and a decreased risk of emergency outages. At the same time, annual investments in these areas are projected at KZT 4 billion, beginning in 2030.

Key financial impacts of climate risks

POTENTIAL FINANCIAL IMPACTS OF PHYSICAL RISKS:

- ◆ Asset damage and loss
- ◆ Disruptions in the supply chain
- ◆ Higher operational costs
- ◆ Unexpected recovery and repair costs
- ◆ Limited access to resources
- ◆ Decline in asset value
- ◆ Business interruption and forced downtime

POTENTIAL FINANCIAL IMPACTS OF TRANSITION RISKS:

- ◆ Asset devaluation
- ◆ Increased costs of compliance with new regulations
- ◆ Rising capital costs due to policy changes
- ◆ Reduced demand for carbon-intensive goods and services
- ◆ Increased costs of modernization and technology adaptation
- ◆ Shifts in market conditions and competitiveness
- ◆ Transformation of the energy market
- ◆ Risk of litigation and reputational damage
- ◆ Restricted access to ESG-focused investment





# CLIMATE CHANGE RISK MANAGEMENT

KEGOC JSC has implemented and is continuously developing a risk management system based on the principles of the integrated COSO ERM model and the corporate requirements of Samruk-Kazyna JSC. The Corporate Risk Management System (CRMS) is a key component of the Company's corporate governance framework and is aimed at timely identification, assessment, and management of risks that may affect the achievement of strategic and operational goals.

The purpose of the CRMS is to ensure business continuity and resilience by minimizing the impact of external and internal factors, including climate change. Climate risk management is integrated into the overall system: such risks are identified, assessed, and, where necessary, quantitatively analyzed based on their potential financial impact. The assessment process takes into account both current and anticipated regulatory requirements, including international standards such as GRI, SASB and ESRS.

The Board of Directors exercises overall oversight of the risk management system, approves key documents, and sets the "tone at the top" regarding risk governance. The Audit Committee under the Board of Directors monitors the effectiveness of CRMS, including climate risk management. Documents submitted to the Board of Directors for approval are first reviewed by this committee.

KEGOC JSC also considers climate and environmental risks in its engagement with suppliers. During the selection of counterparties, due diligence procedures are applied, including questionnaires, assessment of compliance with environmental requirements, and analysis of public restrictions. Contractual terms include supplier obligations to comply with applicable standards in environmental protection, sustainable development, and safety.

Climate-related opportunities are viewed as an integral part of KEGOC JSC strategic development. The advancement of sustainable infrastructure, implementation of green projects, improvements in energy efficiency, and support for national climate policy contribute to risk reduction and the creation of long-term value for all stakeholders.



## PROCESSES FOR IDENTIFYING AND ASSESSING CLIMATE RISKS

### Categories of climate risks and opportunities

#### TRANSITIONAL RISKS

- ◆ Policy and Regulation
- ◆ Technology
- ◆ Market
- ◆ Reputation

#### PHYSICAL RISKS

- ◆ Acute
- ◆ Chronic

#### OPPORTUNITIES

- ◆ Resource Efficiency
- ◆ Energy Sources
- ◆ Products and Services
- ◆ Markets
- ◆ Sustainability

At KEGOC JSC, climate risks are classified as physical (acute and chronic) and transition risks (related to policy, markets, technology, and reputation). Climate risk identification considers their potential impact on the Company's assets, operations, and financial performance. Priority is given to risks that may affect the long-term sustainability or the achievement of KEGOC JSC's strategic objectives.

To assess the scale and significance of these risks, KEGOC JSC applies an adapted methodology based on the analysis of:

- ◆ the geographical location of assets;
- ◆ climate scenarios (RCP 2.6, 4.5, 8.5, and NZE 2050);
- ◆ projected climate impacts;
- ◆ historical climate data (including the Climate Change Knowledge Portal and Kazhydromet RSE);
- ◆ the sensitivity of key facilities to climate change;
- ◆ potential financial consequences, including the impact on EBITDA, operating expenses, and recovery costs.

PHYSICAL RISKS

The identification process for physical climate risks is based on climate change scenario analysis using both international and national sources, including IPCC climate models (RCP2.6, RCP4.5, RCP8.5), International Energy Agency scenarios (IEA NZE 2050), as well as long-term forecasts provided by Kazhydromet RSE.

An assessment was conducted for 83 SS and infrastructure facilities of KEGOC across two main categories of physical risks:

Acute Risks

Floods and inundations that may lead to substation flooding, equipment damage, and power supply disruptions; hurricanes, squalls, and thunderstorms that may result in the destruction of power line supports, conductor breaks, and widespread outages; heavy snowfall and ice storms that lead to ice accumulation on overhead lines, increased structural loads, and higher accident rates.

Chronic Risks

Rising average annual temperatures, which increase thermal load on equipment, lead to higher energy losses in networks, and accelerate asset wear; changes in precipitation and humidity patterns, which may affect soil stability, cause structural corrosion, and require additional infrastructure reinforcement; longer heatwave periods, increasing the need for equipment cooling and maintenance costs; and higher levels of corona losses due to elevated humidity and temperature, especially in southern and Caspian regions.

The risk assessment was carried out using a multi-criteria analysis methodology that includes:

- ◆ probabilistic assessment of climate event occurrence (based on meteorological scenarios up to the year 2100);
- ◆ vulnerability assessment of specific infrastructure facilities;
- ◆ determination of potential impacts on the Company's operations and system performance.

Additionally, regional risk stratification was conducted to reflect Kazakhstan's geographic and climatic heterogeneity, allowing identification of the most sensitive zones: south — susceptible to thermal risks, west — prone to flood risks, central and eastern regions — exposed to complex climate impacts.

Value chain and associated climate risks of KEGOC JSC

OPERATIONS

Risk category

Chronic

Subcategory

Increased humidity and precipitation

Detailed description of climate risk

Higher precipitation levels may affect infrastructure stability and require additional protective measures against soil erosion.

Illustrative impact description

- ◆ Service disruptions due to equipment damage and malfunctions
- ◆ Increased costs for infrastructure reinforcement
- ◆ Risk of corrosion of metal components
- ◆ Increased "corona" losses

Risk category

Acute

Subcategory

Floods

Detailed description of climate risk

Floods and inundations can submerge substations, causing equipment damage and disruptions to the power system.

Illustrative impact description

- ◆ Power supply interruptions, especially critical in high-consumption areas
- ◆ Increased operational costs for repair and equipment recovery

OPERATIONS AND  
INFRASTRUCTURE

Risk category

Chronic

Subcategory

Temperature

Detailed description of climate risk

Continuous temperature increases lead to higher loads on transmission lines and equipment, causing overheating and accelerated aging.

Illustrative impact description

- ◆ Emergency outages
- ◆ Additional maintenance resources
- ◆ Increased electricity losses due to load growth

INFRASTRUCTURE

Risk category

Chronic

Subcategory

Temperature

Detailed description of climate risk

High temperatures can affect transformer cooling systems, increasing the risk of failure.

Illustrative impact description

- ◆ Frequent shutdowns for cooling
- ◆ Reduced transmission efficiency (losses during power transmission through the grid)

Risk category

Chronic

Subcategory

Extreme weather (wind loads)

Detailed description of climate risk

Strong winds and hurricanes may cause conductor breaks and support structure damage, resulting in transmission disruptions.

Illustrative impact description

- ◆ Prolonged power supply interruptions
- ◆ Impact on power system stability
- ◆ Increased repair and recovery costs



TRANSITIONAL RISKS

KEGOC JSC conducts a systematic assessment of transitional climate risks in line with the TCFD recommendations and the requirements of IFRS S1 and S2 standards. The analysis is conducted regularly, taking into account the specifics of the power transmission sector and the current regulatory landscape. The Company identifies legal, technological, and market risks as key categories of transitional risks.

Legal risks

The transition to a low-carbon economy is accompanied by an increase in climate-related regulation. In identifying legal risks, KEGOC JSC considers potential legislative changes, including the establishment of emission standards, implementation of internal and external carbon pricing mechanisms, and expanded ESG disclosure requirements. These changes may lead to additional financial and operational costs, including investments in infrastructure modernization and strengthening compliance processes.

Another significant source of legal risks is the growing number of climate-related lawsuits globally. This trend increases the demand for transparency in reporting and verifiable actions on climate risk management, leading to heightened scrutiny of the accuracy of ESG data and disclosures.

Technological risks

KEGOC JSC monitors technological trends that contribute to reducing GHG emissions, including the development of RES, energy storage systems, and digital solutions. Despite their potential to increase efficiency, these technologies require significant investments, modernization of operational processes, and adaptation of the grid infrastructure. The Company considers potential risks related to delayed implementation of technological solutions, technological obsolescence, or limited availability of innovations necessary for achieving climate goals.

Market risks

The formation of sustained demand for “green” energy and consumer preferences for low-carbon solutions impact the market environment. KEGOC JSC considers shifts in consumer expectations, partner requirements, and financing conditions as factors that may affect demand, capital cost, and the Company’s position in the value chain. These risks require business model adaptation, operational transformation, and enhancement of investment appeal through active participation in the climate agenda.



CLIMATE PROGRAM

In 2024, KEGOC JSC approved its Climate Program for 2025–2060, a key strategic document for climate risk management. The Program aims to ensure the resilience of power transmission infrastructure to changing climate conditions and is aligned with international standards, including TCFD recommendations and climate scenarios from the IPCC and IEA.

The document includes an assessment of physical and transitional risks, modeling of the impacts of various climate scenarios on 83 substations, asset vulnerability analysis, and identification of priority adaptation measures. The Program reflects the specifics of the energy sector, taking into account the geographic distribution of assets and KEGOC JSC’s systemic functions.

Climate risks are integrated into the Company’s unified corporate risk register, assessed at the subsidiary level, and transferred to the Centralized Risk Management Center. Risks are classified, assigned a status (acceptable or requiring response), and accompanied by control measures.

The Board of Directors of KEGOC JSC provides strategic oversight in this area, the Audit Committee reviews risks as part of non-financial reporting, and the Management Board, with the participation of the Sustainable Development Coordination Council and IMS, is responsible for implementing the Program’s provisions.



## CLIMATE CHANGE METRICS AND TARGETS

GRI 305-1, 305-2, 305-4, 305-5

KEGOC JSC MOST SIGNIFICANT CONTRIBUTION TO ENVIRONMENTAL PROTECTION, AS AN ELECTRIC GRID COMPANY AND SYSTEM OPERATOR, IS TO CONTRIBUTE TO THE DECARBONIZATION OF THE ECONOMY OF THE REPUBLIC OF KAZAKHSTAN THROUGH THE INTEGRATION OF RES INTO THE COUNTRY’S UPS.

Integration of the low-carbon agenda allows KEGOC JSC not only to fulfill the role of System Operator for technical connection of RES, but also to strengthen investment attractiveness, meet investors’ expectations and demonstrate sustainable climate ambitions.

### GREENHOUSE GAS INVENTORY

KEGOC JSC performs an annual GHG inventory based on internationally recognized approaches—the 2006 IPCC Guidelines, the Greenhouse Gas Protocol, and the Paris Agreement provisions. The GHG inventory report is consolidated at the corporate level using the operational control approach to define organizational

boundaries. In 2022, the Company prepared its first comprehensive report under these standards and established 2022 as the baseline year. The baseline year is subject to recalculation if the methodology changes, the scope of sources expands, or input data are refined.

The inventory includes CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and SF<sub>6</sub> gases, with global warming potentials determined according to the IPCC Fifth Assessment Report (AR5).

**The main Scope 1 direct emissions sources include:**

- ◆ mobile sources — vehicles used for operational and maintenance activities;
- ◆ stationary sources — generators and power plants used in emergency or maintenance scenarios;
- ◆ SF<sub>6</sub> circuit breakers operated at substations.

Emissions from air conditioning systems were excluded from the calculation due to their insignificant volume and lack of reliable data.

**The Scope 2 indirect energy emissions include:**

- ◆ emissions from electricity consumption for technological and operational needs, including transmission losses in the NPG;
- ◆ emissions from consumed thermal energy.

**Scope 3 emissions were not included due to insufficient data.**

### ANALYSIS OF GHG EMISSIONS

KEGOC is not subject to national greenhouse gas quotas, as the emission volumes are below the thresholds established by the Environmental Code of the Republic of Kazakhstan. Nevertheless, the Company voluntarily conducts a full inventory

of greenhouse gas emissions in accordance with international obligations (UN Framework Convention on Climate Change, Kyoto Protocol, Paris Agreement) of the Republic of Kazakhstan and corporate goals on carbon footprint reduction.

**Greenhouse gas emissions indicators for 2024**

GRI 305-1, 305-2

Emissions	Total (tCO <sub>2</sub> -eq)	CO <sub>2</sub> (t)	CH <sub>4</sub> (tCO <sub>2</sub> -eq)	N <sub>2</sub> O (tCO <sub>2</sub> -eq)	SF <sub>6</sub> (tCO <sub>2</sub> -eq)
Scope 1	13,491.04	10,036.86	49.33	129.67	3,275.20
Scope 2	2,357,187.40	2,357,187.40	-	-	-

**Emissions indicators, tons of CO<sub>2</sub> equivalent**

GRI 305-1, 305-2

Emissions	2022	2023	2024
Scope 1	8,887	10,339	13,491
Scope 2	2,692,188*	2,524,980*	2,357,187
Total:	2,701,075	2,535,319	2,370,678

\* The Scope 2 greenhouse gas emissions for 2022 and 2023 disclosed in the 2024 report were recalculated using the market-based method to ensure comparability with 2024.

Direct emissions are primarily generated by motor vehicles used in production and maintenance activities, as well as stationary and portable generators employed for emergency power supply. An additional source of emissions may be SF<sub>6</sub> leaks from high-voltage circuit breakers at 110–500 kV substations.

In 2024, direct greenhouse gas emissions (Scope 1) amounted to 13,491 tons of CO<sub>2</sub> equivalent, which is 3,152 tons more than in 2023. The increase was due to two technical incidents: the destruction of one SF<sub>6</sub> circuit breaker and a leak from the sealing rings of the drive mechanism of another, caused by a design defect. In both cases, inquiries were sent to the manufacturers to obtain explanations and prevent similar incidents in the future.



KEGOC JSC uses modern SF<sub>6</sub>-based equipment from ABB, Siemens, and General Electric, known for their high reliability. Operations are carried out by qualified personnel in strict accordance with regulations. From 2020 to 2024, the average SF<sub>6</sub> leakage rate was 0.11% per year. Currently, there are no alternatives to SF<sub>6</sub> circuit breakers in the 220–500 kV voltage class. Vacuum circuit breakers at 110 kV have not yet seen widespread adoption and are not used by the Company, although their implementation is being considered. At the same time, KEGOC is gradually reducing the use of SF<sub>6</sub> in 35 kV equipment by installing vacuum circuit breakers during substation upgrades.

The main volume of Scope 2 emissions is associated with electricity purchased to compensate for technological losses in the transmission of electricity via the National Power Grid. These losses are inevitable and depend on several factors, including the volume of transmitted electricity, the length and configuration of transmission lines, climatic conditions, and parallel operation with neighboring power systems. While complete elimination of these losses is not possible, the Company implements measures to optimize the operating modes of the Unified Power System of the Republic of Kazakhstan, which help reduce electricity losses. Reductions in electricity consumption for operational needs are achieved through the implementation of the 2021–2025 Energy Saving and Energy Efficiency Action Plan. These measures, along with the increasing share of renewable energy generation, contributed to emission reductions during the reporting year.

GHG emission intensity in 2022–2024

	GRI 305-4		
	2022	2023	2024
Total greenhouse gas emissions (Scope 1 and Scope 2), tCO <sub>2</sub> -eq	2,701,075	2,535,319	2,370,678
Total revenue, thousand KZT	217,255,600	252,136,383	319,905,932
Total GHG emissions intensity (Scope 1 and Scope 2), tCO <sub>2</sub> -eq/thousand KZT	0.012	0.010	0.0074

Indirect emissions (Scope 2) in 2024 amounted to 2,357,187 tons of CO<sub>2</sub> equivalent, down by 167,793 tons or 6.64% compared to 2023.

It should be noted that on July 1, 2023, there was a change in the electricity procurement system of the Republic of Kazakhstan, with a transition from the purchase of electricity from energy supplying organizations to purchase from the Single Purchaser. Also, since the end of 2021, the official network emission factor has ceased to be updated. Therefore, the Company recalculated Scope 2 values for 2022–2023 and also calculated Scope 2 for 2024 using market-based methodology using shares of electricity generation by fuel type from the Single Buyer (see Table 33). Currently, this method provides a more accurate assessment of the Company’s carbon footprint and corresponds to the unified approaches adopted in the group of companies of Samruk-Kazyna Fund.

Thus, despite an increase in electricity supply to the grid and the corresponding rise in electricity losses, Scope 2 emissions are decreasing due to the Company’s energy-saving and energy-efficiency efforts, as well as the growing share of renewables in the energy mix (from 3.6% in 2021 to 6.4% in 2024).

Total greenhouse gas emissions under Scope 1 and Scope 2 for 2024 amounted to 2,370,678 tons of CO<sub>2</sub> equivalent, which is lower than in 2022 and 2023. The overall reduction in the Company’s carbon footprint was primarily driven by a significant decrease in indirect emissions.

In the reporting year, the total GHG emissions intensity (Scope 1 and Scope 2) amounted to 0.0074 tCO<sub>2</sub>-eq/ thousand KZT, representing a 26% decrease compared to 2023, which is attributable to the reduction in total GHG emissions (Scope 1 and Scope 2).

Measures that reduced greenhouse gas emissions fall under Scope 2 and included measures to reduce electricity and heat consumption. When calculating GHG emission reductions, the same methodology, standards were used, the same gases were included, and the same base year was selected as in the calculation of GHG emissions for 2024.

GHG emissions reductions as a result of energy saving and energy efficiency measures

	GRI 305-5		
	2022	2023	2024
GHG emissions reduction, tCO <sub>2</sub> -eq	3,133.11	8,648.94	9,045.42

CLIMATE CHANGE TARGETS

KEGOC JSC has established quantifiable GHG emission reduction targets as part of its LCDP through 2031, which was approved in 2024. These mid-term targets cover both direct (Scope 1) and indirect (Scope 2) emissions, reflecting the Company’s commitment to sustainable development principles and climate obligations in line with national and international strategies:

- ◆ For Scope 1, the target is to reduce emissions by 2% by 2030 through the gradual replacement of internal combustion engine passenger vehicles with low-carbon alternatives, primarily electric vehicles and vehicles powered by liquefied petroleum gas.
- ◆ For Scope 2, the goal is to achieve a 20% share of “green” electricity in the purchased energy mix by 2031. This target will be achieved by increasing the share of RES in the national energy balance and applying the market-based method for calculating indirect emissions, which reflects the actual structure of procured electricity.

The results of implemented measures already confirm the effectiveness of the adopted strategy: by the end of 2024, the Company reduced its total emissions by 9,045.42 tCO<sub>2</sub>-eq. This outcome demonstrates the feasibility of the established targets and provides a strong foundation for further advancing the climate agenda.

In addition to reducing its own emissions, KEGOC JSC joined the global Utilities for Net Zero Alliance (UNEZA), officially launched at COP28 in Dubai with the support of IRENA and the UN Climate Champions. The Alliance unites 25 leading global utilities serving more than 250 million consumers, with the goal of accelerating the energy transition and achieving carbon neutrality by 2050. As part of UNEZA, KEGOC JSC will contribute to the development of RES-ready grids, modernization of energy infrastructure, and enhancement of international cooperation to eliminate decarbonization barriers. The Company’s participation in the Alliance underscores its commitment to fulfilling the climate objectives outlined in the national Carbon Neutrality Strategy and the corporate Carbon footprint reduction program.

Climate targets are considered by the Company as a key element of its strategic transformation, and KEGOC plans to regularly review its targets in light of technological innovations, policy developments, and changes in the energy market structure.

# OCCUPATIONAL HEALTH AND SAFETY

GRI 2-12, 2-13

## KEY PERFORMANCE INDICATORS FOR 2024

0

Lost Time Injury  
Frequency Rate (LTIFR)



0

Number of fires



0

Fatal Accident  
Rate (FAR)



0

Number  
of accidents



0

Number of road traffic  
accidents



3.078  
billion tenge

Occupational health and  
safety expenditures



99.99987%

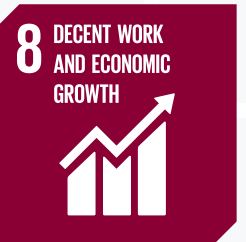
General availability level  
of systems (GA)

KEGOC JSC regards occupational safety and the health of employees as an unconditional priority. The Company systematically works to create safe working conditions, reduce occupational injuries, improve sanitary and welfare conditions, and minimise the impact of harmful factors on employees.

## KEY DOCUMENTS ON OCCUPATIONAL HEALTH AND SAFETY

- ◆ Development Plan for 2023–2032
- ◆ Guide to the Sustainable Development Management System
- ◆ Occupational Health and Safety Policy
- ◆ Objectives for Quality, Environment, Occupational Safety and Health
- ◆ Hazard and Risk Register
- ◆ Occupational Health and Safety Management System Manual
- ◆ Occupational Safety and Health Management Planning Standard
- ◆ Behavioural Audit Standard
- ◆ Safety Management Standard for Work Performed by Contractors
- ◆ Rules for Incident and Accident Investigation and Reporting on Occupational Health and Safety
- ◆ Occupational Safety Rules for Working at Heights

## CONTRIBUTION TO THE UN SDGS





GRI 2-24, 403-1, 403-8

KEGOC JSC regards occupational safety and the health of employees as an unconditional priority. The Company systematically works to create safe working conditions, reduce occupational injuries, improve sanitary and welfare conditions, and minimise the impact of harmful factors on employees.

The Company has implemented and successfully operates the Occupational Health and Safety Management System (OHSMS) based on ISO 45001, which is an integral part of the Company's integrated management system and applies to the activities of all structural subdivisions and subsidiaries of the Company and its contractors. The scope of application of the OHSMS is to perform the functions of a system operator in the electric power industry: provision of system services to wholesale electricity market entities for the transmission of electricity through the national electricity network, technical dispatching and organization of balancing of electricity production and consumption.

In order to confirm KEGOC JSC's compliance with the OHSMS, a certification audit was conducted in 2023 by "MS CERTIFICATION SERVICES PRIVATE LIMITED" (India), an independent certification body, and in 2024 — a supervisory audit, which confirmed the compliance of the OHSMS with the requirements of international standards.

Every year, a program in the field of occupational health and safety is formed, which determines the necessary measures, costs and deadlines for their implementation. The Company has successfully implemented and passed certification for compliance with the international standard ISO 45001:2018.



GRI 403-3

In accordance with the laws of the Republic of Kazakhstan, the Company provides mandatory insurance for employees against accidents related to the performance of their work (official) duties. Additionally, 24/7 life and health accident insurance not related to professional activity is provided, as well as voluntary health insurance in case of illness — all aimed at enhancing the social protection of employees.

Each branch of the Company has established Occupational Health and Safety Services. These services are responsible for organising and



implementing technical and organisational measures on occupational health and safety, conducting internal OHS control, and monitoring compliance with regulatory legal acts on health and safety by employees.

GRI 403-2, 403-3, 403-4

To ensure effective dialogue between employees and the employer in the field of occupational safety, production safety councils have been established in KEGOC JSC and its branches. These councils operate on a parity basis with the participation of both parties and are aimed at consolidating efforts to ensure safe working conditions and health protection in the workplace.

Designated technical inspectors participate in regular inspections of working conditions, safety, and occupational health. All Company employees not only have the obligation but also the right to suspend work upon identifying potentially hazardous conditions or actions. The Company's management fully supports employees in their decisions to stop unsafe work.

At least once per quarter, the production safety councils consider employee proposals to improve working conditions and safety. As a result, mandatory measures are developed to be implemented by both the employer and employees.

RISK ASSESSMENT

GRI 403-2, 403-7, 403-10

KEGOC JSC conducts annual identification and assessment of occupational risks at workplaces. Based on the results, a risk register is compiled, including a list of significant occupational health and safety risks, and measures are developed to mitigate them.

Risk analysis is carried out considering both the likelihood of occurrence and potential consequences. Key risks that may negatively impact the Company’s operations and the achievement of its strategic goals are identified. Depending on the nature of the risks, qualitative, quantitative, or combined assessment methods are used.

Hazard and risk assessment and management are performed to establish occupational health and safety management objectives and to achieve an acceptable level of impact of production and business operations on the environment and employees of KEGOC JSC.

The results of hazard and risk assessment and analysis serve as input for the development of performance indicators and targets. Hazard and risk assessment is conducted based on activity type and hazard classifiers applicable to KEGOC JSC operations, considering geographic location and climate. The process includes:

- ◆ identification of hazards and risks using classifiers;
- ◆ risk assessment with existing control measures in place;
- ◆ determination of all additional necessary risk control measures;
- ◆ evaluation of whether current control measures are sufficient to reduce the risk to an acceptable level.

Following the identification of exposure factors affecting the workplaces of structural units, a risk register is compiled using the FMEA method. Based on the assessment results, lists of significant occupational health and safety risks across KEGOC JSC are formed. To reduce the risk level, required mitigation measures are defined and formalised in annual programmes.

One of the key risks to the Company’s operations is the risk of occupational accidents.

To minimise this risk, the following measures were implemented in 2024:

- ◆ qualification assessments on occupational and industrial safety regulations;
- ◆ analysis of video footage of operational switching and maintenance work processes;
- ◆ Safety days;
- ◆ unscheduled workplace inspections at MES branches;

- ◆ behavioral safety audits during on-site work;
- ◆ Monitoring of speed limit compliance by drivers via satellite tracking systems and dashcam recordings; and more.

Company employees undergo all mandatory occupational health and safety training, including qualification checks on energy sector regulations, at least once every three years. In 2024, additional training was conducted on the international standard “NEBOSH International General Certificate in Occupational health and safety” and “Occupational safety culture”. The Company also participated in the “KIOSH 2024” occupational health and industrial safety conference.

GRI 403-5

Before being allowed to work, employees undergo training in safe working practices, on-the-job internships, initial qualification assessments, control drills, and job shadowing under the supervision of a designated trainer.

Training was also conducted on the use of fall protection harness systems for personal protection against falls from height. This training was provided to those responsible for safe work procedures among

the personnel of overhead transmission line production units on the topic: “Use of fall arrest systems for personal protection against falls from height.”

GRI 403-2, 403-3, 403-6, 403-10

Mandatory pre-shift and post-shift medical examinations are conducted at the Company for employees engaged in hard physical labour or work in harmful and/or hazardous conditions, as well as pre-trip and post-trip medical checks for drivers. As part of its commitment to employee health and disease prevention, KEGOC JSC ensures that production personnel undergo annual medical examinations at healthcare facilities, in full compliance with medical confidentiality. This includes the protection of personal medical data, health status, diagnoses, and any other information obtained during the examination or treatment of employees, in accordance with the Code on public health and the health system of the Republic of Kazakhstan.

In 2024, no occupational diseases were recorded among KEGOC JSC employees, outstaffed personnel, or contractor employees.



INJURIES

GRI 403-9, SASB IF-EU-320A.1

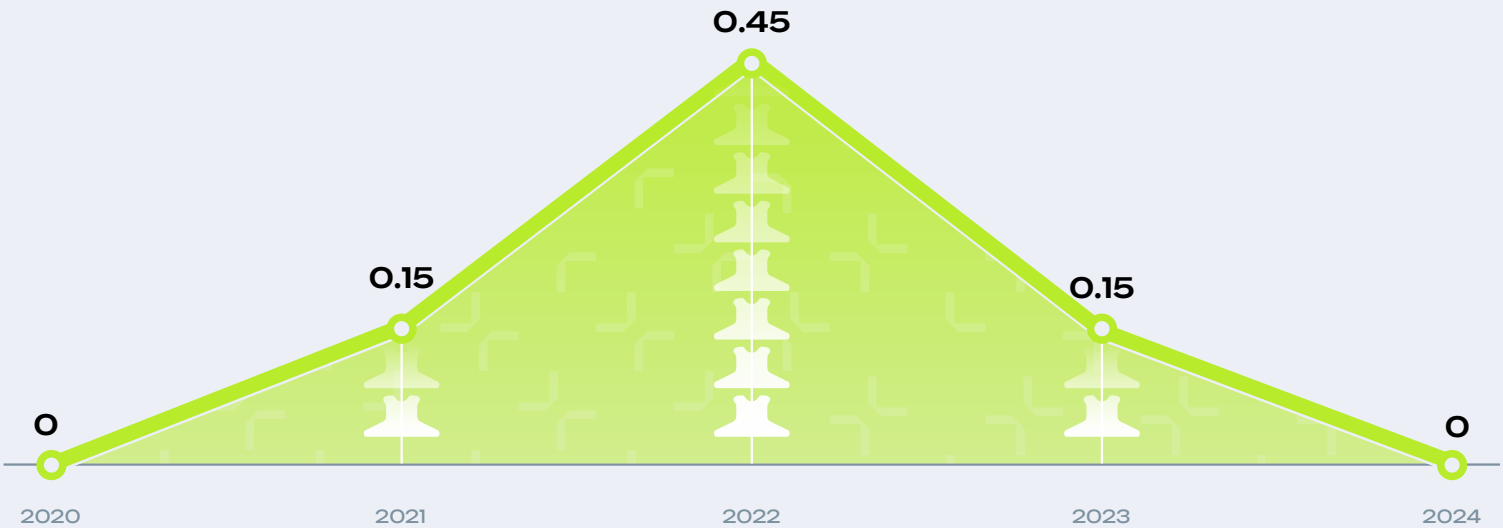
To assess the level of occupational safety at KEGOC JSC, the international LTIFR (Lost Time Injury Frequency Rate) indicator is used. This rate includes work-related fatalities (FAR) and reflects the number of lost time injuries (LTI) per one million hours worked. It serves as a key benchmark in international practice for evaluating the effectiveness of occupational and industrial safety management systems.

In 2024, the LTIFR was 0, with a total of 7,990,086 hours worked (compared to 0.13 in 2023; excluding Energoinform JSC — 0.15).

No work-related injuries were recorded during the reporting period.

Lost Time Injury Frequency Rate among KEGOC JSC employees (excluding Energoinform JSC)

LTIFR



GRI 403-2

In the event of incidents, KEGOC JSC employees follow established procedures that govern the investigation of incidents and accidents, as well as the reporting processes related to occupational health and safety.

The typical causes of work-related accidents in the Company's operations include:

- ♦ falls from height;
- ♦ electric trauma;
- ♦ road traffic accidents.

WORK WITH CONTRACTING ORGANIZATIONS

GRI 403-5, 403-7, 403-8, 403-9, EU18

When work is performed at KEGOC JSC facilities by contractors and outstaffed organizations, the Company assumes responsibility for ensuring the safety of these workers. All work and service contracts include mandatory provisions requiring compliance with the legislation of the Republic of Kazakhstan and the Company's internal occupational health and industrial safety regulations.

Prior to the commencement of work, orientation meetings are held with contractor representatives. All contractor personnel undergo introductory and job-specific briefings on occupational and fire safety. Targeted safety briefings are conducted daily, highlighting current hazardous and harmful production factors at Company sites. Engineering and technical personnel of contractor organizations also receive training under the "Occupational Safety Culture" course.

During work execution, internal monitoring of occupational safety requirements is carried out, including regular Behavioral Safety Audits (BSA) and performance evaluations of contractors in the area of occupational health and safety. All contractor and outstaffed personnel involved in work at KEGOC JSC production sites are fully covered by the Company's occupational health and safety management system.

In 2024, no work-related injuries or fatalities were recorded among contractor or outstaffed workers at the Company's facilities, with a total of 461,513 hours worked.

# PROCUREMENT PRACTICES

## GRI 2-6

KEGOC JSC has established an effective procurement system based on the principles of transparency, openness, equality, and the promotion of fair competition.

In 2024, the Company's procurement activities were carried out in accordance with the Procurement Procedure of Samruk-Kazyna JSC and organizations in which Samruk-Kazyna JSC directly or indirectly owns 50% or more of the voting shares (interests) through ownership or trust management, as approved by the Fund's Board of Directors.

The priorities of procurement activities include:

- ◆ purchasing goods from organizations involving persons with disabilities that are registered in the Samruk-Kazyna Group supplier registry (including individual entrepreneurs with disabilities) and that manufacture the procured products;
- ◆ purchasing goods from manufacturers of the procured goods who are registered in the Samruk-Kazyna group manufacturer registry;
- ◆ conducting procurement among pre-qualified potential suppliers.

The Company applies a preliminary qualification procedure for potential suppliers, which includes assessing compliance with the qualification requirements defined under the above Procedure. This assessment is conducted through questionnaires and audits.

## GRI 2-24

As part of the preliminary qualification procedure, potential suppliers are evaluated based on the following criteria:

- ◆ legal compliance;
- ◆ organization of contractual activities;
- ◆ availability of supplier resources;
- ◆ quality assurance of goods, works, and services;
- ◆ project and risk management; occupational health and safety;
- ◆ environmental protection.

KEGOC JSC also took measures to support manufacturers of procured goods as stipulated by the relevant procedure.

Potential suppliers are not eligible to participate in the Company's procurement procedures if:

- ◆ the potential supplier, its subcontractor (co-executor), or consortium member is listed in the register of unscrupulous participants of public procurement and/or in the register of dishonest suppliers, and/or in the list of unreliable potential suppliers (suppliers) of Samruk-Kazyna JSC, and/or in the list of debtors recognized bankrupt by a court decision in force;

- ◆ the potential supplier and/or its subcontractor (co-executor), and/or their executives or founders (shareholders) are listed among entities and individuals associated with the financing of terrorism and extremism, or with the financing of the proliferation of weapons of mass destruction, as defined by the Law of the Republic of Kazakhstan On Counteracting Legalization (Laundering) of Proceeds from crime and financing of terrorism;
- ◆ the potential supplier and/or its subcontractor (co-executor), and/or their founders (shareholders) are legal entities registered in countries or territories listed by the authorized state body as tax havens.

Accordingly, all procurement procedures include mandatory screening of potential suppliers for compliance with the above restrictions.

## GRI 2-25, 2-26

KEGOC JSC ensures that potential suppliers have the right to submit appeals and complaints in the event of disagreement with the actions (or inaction) of the procurement organizer or decisions of the tender or expert commission.

All appeals are reviewed in accordance with established procedures, with a mandatory analysis of the claims presented. Based on the results, reasoned decisions are made to either uphold or reject the complaint, with subsequent notification of the applicants.

To facilitate interaction with suppliers, procurement procedures are conducted via the Samruk-Kazyna JSC Electronic Procurement Portal ([www.zakup.sk.kz](http://www.zakup.sk.kz)), which ensures broader supplier participation and fosters a competitive environment, thereby enhancing procurement efficiency.

The current Annual procurement plan and Long-term procurement plan of KEGOC JSC are published on both the Samruk-Kazyna JSC Procurement portal and on the KEGOC JSC official website ([www.kegoc.kz](http://www.kegoc.kz)) in the "Procurement" section.



Procurement by KEGOC JSC in 2024, million tenge

	KEGOC JSC	Energoinform JSC	Total
Goods (excluding electricity from neighboring countries, including the Russian Federation and the Kyrgyz Republic)	28,811	402.64	29,214
Works	18,733	22.88	18,756
Services	14,444	462.55	14,907
Electricity	67,355	38.50	67,394
Total	129,343	926.57	130,270

To promote sustainable development principles and ESG among its contractors, KEGOC JSC has developed and implemented a Supplier Code of Conduct based on the UN Global Compact principles and the Sustainable Development Goals (SDGs).

The Code is an integral part of all supplier contracts and reflects the Company’s commitment to building a responsible and ethical supply chain. All KEGOC JSC suppliers are required to comply with the Code provisions, including the following principles:

- ◆ prohibition of corruption and related offenses in their activities;
- ◆ prohibition for their employees, representatives, and subcontractors under contracts with the
- ◆ Company from engaging in commercial bribery and other corrupt practices;
- ◆ elimination of all forms of illegal forced labor;
- ◆ prohibition of child labor;
- ◆ exclusion of any form of discrimination, including in employment and labor relations;
- ◆ compliance with labor regulations regarding working hours and rest periods;
- ◆ compliance with regulations on minimum wage;
- ◆ adherence to labor legislation.

The Code also includes norms for suppliers' compliance with the following principles:

- ◆ fair employment practices;
- ◆ ethical standards;
- ◆ anti-corruption requirements;
- ◆ occupational health and safety;
- ◆ environmental protection;
- ◆ confidentiality and data security.

KEGOC JSC implements procurement category strategies (PCS) of Samruk-Kazyna JSC aimed at optimizing procurement approaches for goods, works, and services, focusing on maximizing benefits over the long or short term. These strategies are based on analyses of past expenditures, future needs, supply markets, and business requirements.

In 2024, Samruk-Kazyna JSC implemented PCS for the categories “IT Equipment” and “Special Clothing.”

Supplier Indicators for Goods in 2024

Suppliers — Registry (PDPO)	
including	
In PCS framework	1
Not in PCS framework	0
Total Contract Amount	195,943,200

Suppliers — Non-registry (PDPO)	
including	
In PCS framework	1
Not in PCS framework	0
Total contract amount	37,865,256

GRI 2-6

In 2024, the share of domestic value in KEGOC JSC’s procurement of goods, works, and services was 76%, including:

- ◆ 64% in goods procurement (excluding electricity supplies from neighboring countries);
- ◆ 81% in works and services procurement.

For the subsidiary Energoinform JSC, the domestic value shares were:

- ◆ 26.95% in goods procurement;
- ◆ 98.97% in works and services procurement.

76%

the share of domestic value in procurement of goods, works, and services in 2024



# CORPORATE GOVERNANCE



91	Management structure of the KEGOC JSC
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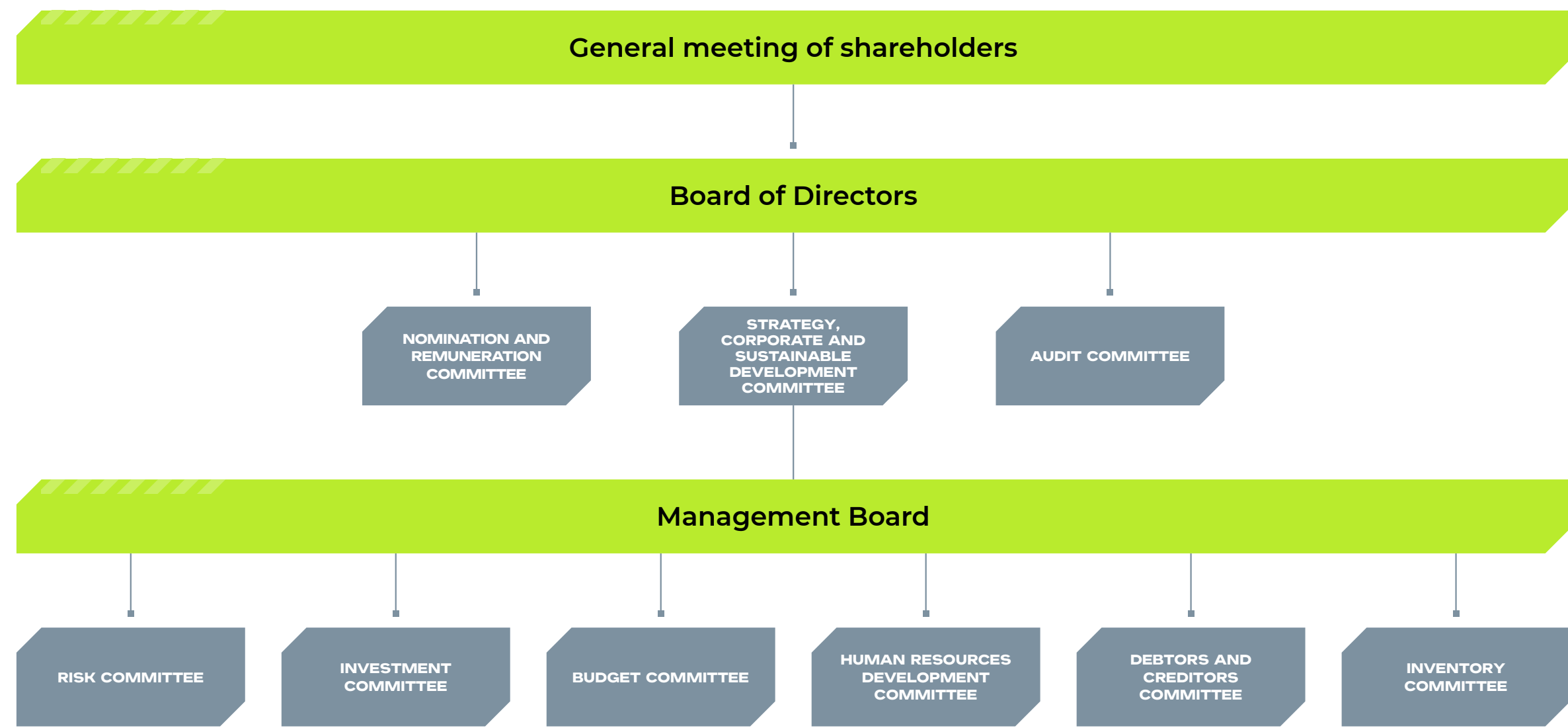
# MANAGEMENT STRUCTURE OF THE KEGOC JSC

The principles of corporate governance, according to the Corporate governance code of KEGOC JSC, are:

- ◆ an effective corporate governance system based on a clear division of responsibilities between the governing bodies;
- ◆ protection and ensuring compliance with shareholders' rights;
- ◆ equal conditions for shareholders;
- ◆ sustainable development and the role of stakeholders in corporate governance;
- ◆ information disclosure and transparency;
- ◆ effectiveness of the Board of Directors and the Management Board of KEGOC JSC.

Management structure at KEGOC JSC

GRI 2-9



SHARE CAPITAL

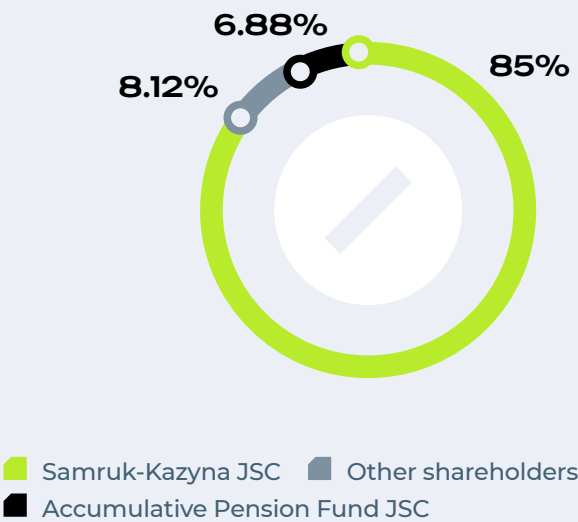
GRI 2-1

As of December 31, 2024, the number of authorized and issued common shares of the Company was 275,294,118, of which:

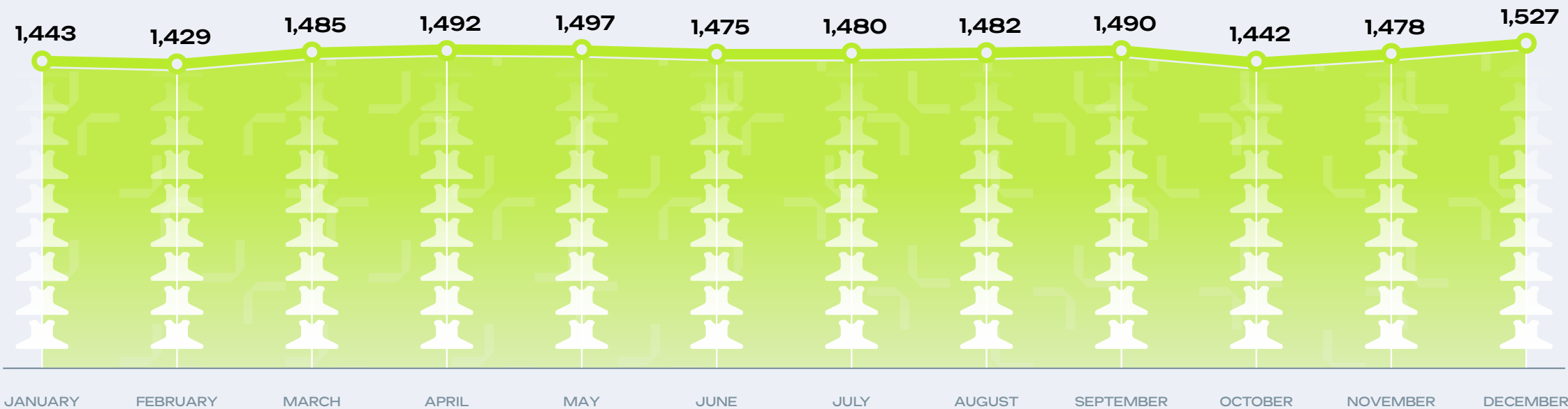
- ◆ the major shareholder, represented by Samruk-Kazyna JSC, holds 234,000,001 shares (85%);
- ◆ Accumulative Pension Fund JSC holds 18,951,093 shares (6.88%);
- ◆ 22,341,634 shares (8.12%) are held by minority shareholders<sup>2</sup>;
- ◆ the remaining 1,390 shares (0.0005%) are repurchased by KEGOC JSC.

There were no significant transactions or changes in shares and shareholders holding five percent or more of the Company's issued shares during 2024.

Structure of KEGOC JSC's shareholders as of 31 December 2024

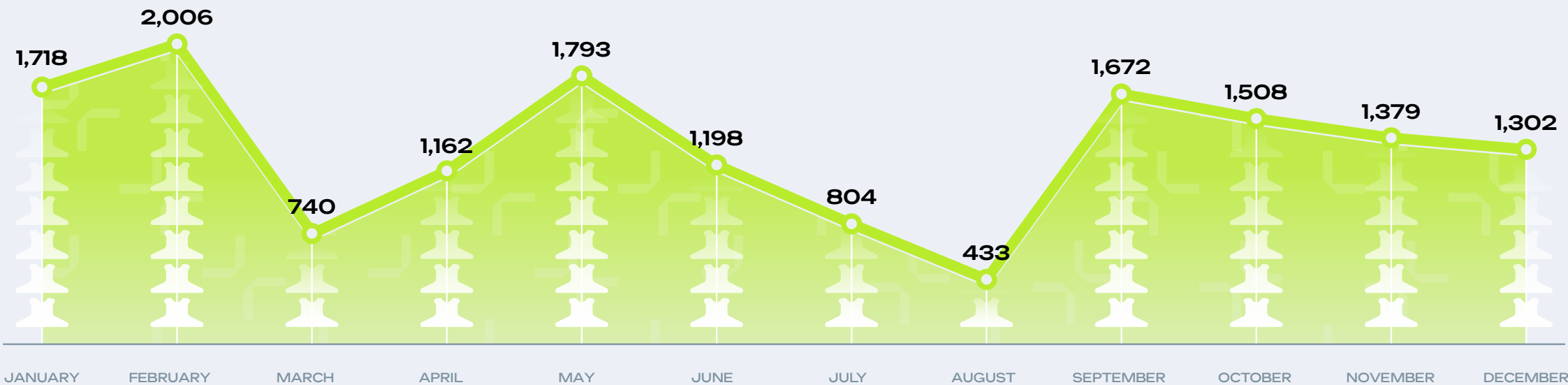


Value of KEGOC JSC shares in 2024\*, tenge



Dynamics of trading volumes of KEGOC JSC shares in 2024\*, million tenge

\* Data Source — KASE (<https://kase.kz>).



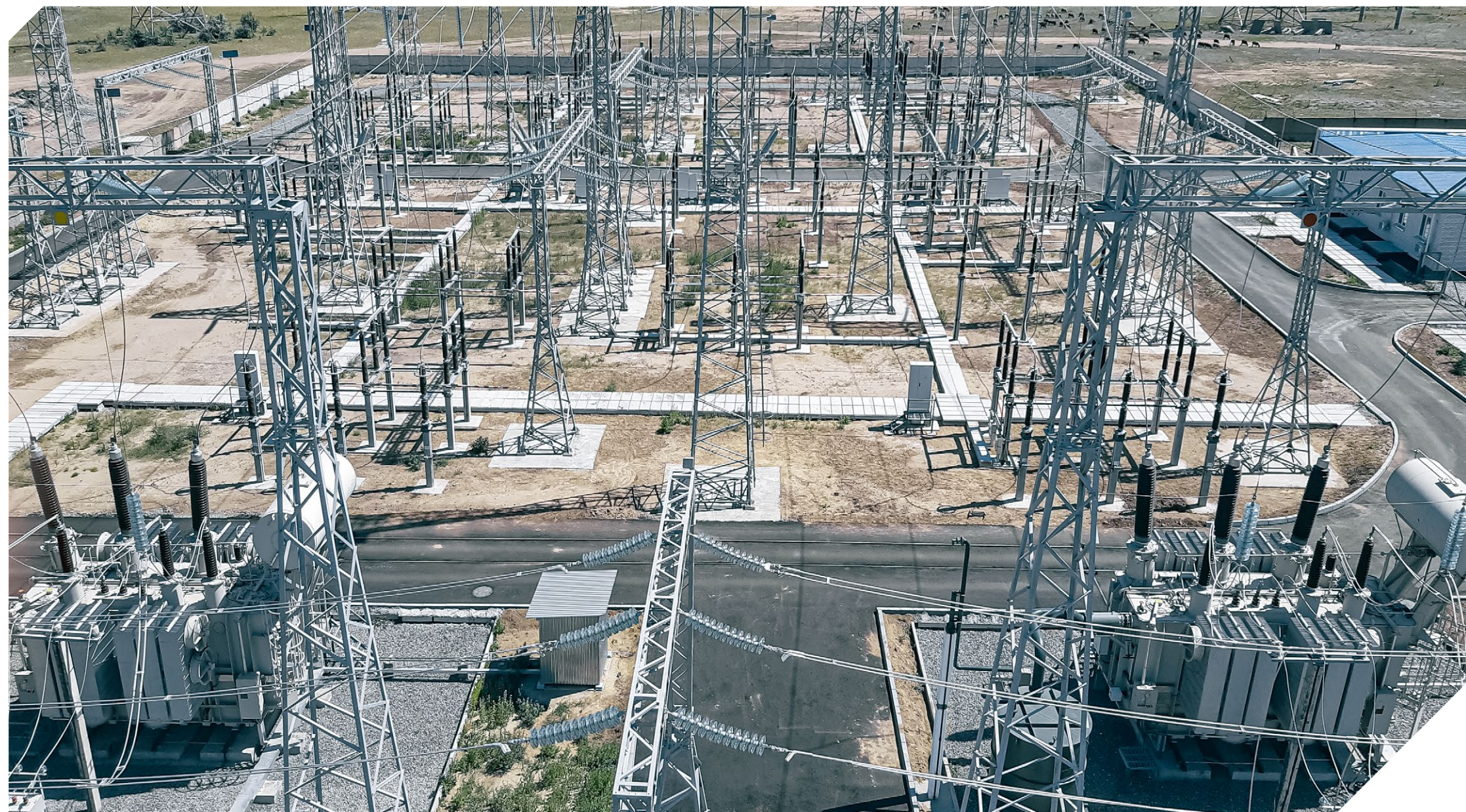
<sup>2</sup> In accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" prohibits officials of the Company (Chairman and members of the Board of Directors and the Management Board), equivalent to persons authorized to perform state functions, to own shares of the Company. ([https://online.zakon.kz/Document/?doc\\_id=33478302&pos=60;-50#pos=60;-50](https://online.zakon.kz/Document/?doc_id=33478302&pos=60;-50#pos=60;-50)).



# COMPLIANCE WITH THE CORPORATE GOVERNANCE CODE

THE COMPANY'S CORPORATE GOVERNANCE CODE WAS ADOPTED ON THE BASIS OF THE CORPORATE GOVERNANCE CODE OF SAMRUK-KAZYNA JSC. THE OBJECTIVES OF THE CORPORATE GOVERNANCE CODE ARE TO IMPROVE CORPORATE GOVERNANCE, ENSURE TRANSPARENCY IN MANAGEMENT, AND CONFIRM THE COMPANY'S COMMITMENT TO THE PRINCIPLES OF PROPER CORPORATE GOVERNANCE.

An analysis of the Company's compliance with the principles and provisions of the Corporate Governance Code showed that the Company complied with all applicable provisions of the Code during the reporting year. The report on compliance with the principles and provisions of the Corporate governance code for 2024 is available via the [link](#).





# GENERAL MEETING OF SHAREHOLDERS

The General Meeting of Shareholders is the highest governing body of KEGOC JSC.

It operates and exercises its rights in accordance with the Law of the Republic of Kazakhstan “On Joint Stock Companies” the Charter, and the Regulations on the General Meeting of Shareholders of KEGOC JSC.

In 2024, two General Meetings of Shareholders were held:

**1. The Annual General Meeting of Shareholders was held on May 2, 2024, during which the following resolutions were adopted:**

- ◆ approval of the financial statements of KEGOC JSC for the year ended December 31, 2023; distribution of net income of KEGOC JSC; decision on the payment of dividends on ordinary shares; and approval of the amount of dividend per ordinary share of KEGOC JSC for the second half of 2023.
- ◆ determination of the quantitative composition and term of office of the Board of Directors of KEGOC JSC; election of its members and the Chairman of the Board of Directors of KEGOC JSC and determination of the amount and terms of remuneration and reimbursement of expenses for members of the Board of Directors of KEGOC JSC in the performance of their duties.

- ◆ approval of the new version of the Corporate Governance Code of KEGOC JSC.
- ◆ review of shareholder appeals regarding the actions of KEGOC JSC and its officers, and the results of their consideration.
- ◆ amendments and additions to the quantitative composition of the Counting Commission of the General meeting of shareholders of KEGOC JSC.
- ◆ determination of the audit organization to perform the audit of KEGOC JSC and the amount of payment for its services.

**2. The Extraordinary General Meeting of Shareholders was held on October 11, 2024, during which the following resolution was adopted:**

- ◆ “Approval of the financial statements of KEGOC JSC for the six-month period ended June 30, 2024; distribution of net income; decision on the payment of dividends on ordinary shares; and approval of the amount of dividend per ordinary share of KEGOC JSC for the first half of 2024.”

## RIGHTS OF MINORITY SHAREHOLDERS

Corporate governance in the Company is structured to ensure equal rights and fair treatment for all shareholders. The rights, duties, and competencies of shareholders are equal and determined according to applicable legislation and are enshrined in the Company’s Charter. Shareholder rights include, but are not limited to, timely receipt of information sufficient for decision-making in the manner prescribed by the legislation of the Republic of Kazakhstan, the Charter, and the Company’s internal information disclosure documents; participation in the General meeting

of shareholders and voting on matters within their competence; participation in determining the quantitative composition and term of the Board of Directors, electing its members and terminating their powers, and determining the size and conditions of remuneration; receiving dividends in amounts and terms determined by the General Meeting of Shareholders based on a clear and transparent dividend policy; transferring voting rights when participating in the General Meeting of Shareholders by proxy, and participating in the joint sale of shares.





# DIVIDEND POLICY

KEGOC JSC'S DIVIDEND POLICY IS BASED ON BALANCING THE INTERESTS OF THE COMPANY AND SHAREHOLDERS WHEN DETERMINING THE SIZE OF DIVIDEND PAYMENTS, ENHANCING THE COMPANY'S INVESTMENT ATTRACTIVENESS AND CAPITALIZATION, AND RESPECTING AND STRICTLY OBSERVING THE SHAREHOLDERS' RIGHTS PROVIDED BY THE LEGISLATION OF THE REPUBLIC OF KAZAKHSTAN.

The Company strives to increase the amount of dividends paid alongside capitalization growth, based on the net income for the year and the needs for the Company's production and investment activities development.

The main conditions for dividend payments are: the Company has net profit for the reporting period or retained earnings; there are no restrictions on dividend payments as provided by the legislation of the Republic of Kazakhstan and the Company's Dividend Policy; and the General Meeting of Shareholders has decided to pay dividends.

The source of dividend payments to shareholders is the net income for the corresponding financial year or half-year, or retained earnings, calculated based on KEGOC JSC's consolidated financial statements prepared in accordance with IFRS. When preparing a proposal on the distribution of net income for the financial year or half-year and the size of dividends, the Board of Directors proceeds from the principle that the amount allocated for dividend payments should be at least 60% of net income. The decision on dividend payments on KEGOC JSC's common shares for the year is made by the Annual General Meeting of Shareholders

after the Company's annual financial statements are approved. The decision on dividend payments on KEGOC JSC's common shares for the half-year can be made by an Extraordinary General Meeting of Shareholders within three months after the audit of the Company's financial statements for the corresponding period. The General Meeting of Shareholders, after considering the proposals of the Board of Directors, makes the final decision on dividend payments on KEGOC JSC's common shares, approves the amount of dividends per common share of KEGOC JSC, and sets the date for the start of dividend payments at its discretion.

## Dividend payments at KEGOC JSC

Period for which dividends were accrued	2019		2020		2021		2022		2023		2024
	first half-year	second half-year	first half-year	second half-year	first half-year	second half-year	first half-year	second half-year	first half-year	second half-year	first half-year
Amount of dividend per share, KZT	67.17	48.86	77.09	75.01	84.72	50.85	65.44	50.59	77.74	79.5	82.4
Total amount of accrued dividends, KZT thousand	17,464,107	12,703,532	20,043,293	19,502,496	22,027,082	13,220,929	17,014,309	13,153,330	20,212,292	21,885,772	22,684,121
Name of the issuer's management body that made the decision to pay dividends	General meeting of shareholders										
Date of the meeting of the issuer's management body, at which the decision to pay dividends was taken, date and number of minutes	25 October 2019 №14	29 May 2020 №17	23 October 2020 №19	27 April 2021 №21	29 October 2021 №24	26 May 2022 №27	27 October 2022 №29	2 May 2023 №31	26 September 2023 №34	2 May 2023 №35	11 October 2024 №36
Date of compilation of the list of persons entitled to receive dividends	4 November 2019	8 June 2020	29 October 2020	11 May 2021	8 November 2021	7 June 2022	15 December 2022	12 May 2023	26 September 2023	24 May 2024	28 October 2024

# REPORT ON THE ACTIVITIES OF THE BOARD OF DIRECTORS

GRI 2-13

THE BOARD OF DIRECTORS IS ACCOUNTABLE TO THE GENERAL MEETING OF SHAREHOLDERS, PROVIDES STRATEGIC AND OVERALL MANAGEMENT OF THE COMPANY, AND OVERSEES THE ACTIVITIES OF THE MANAGEMENT BOARD, EXCEPT FOR MATTERS WITHIN THE COMPETENCE OF THE GENERAL MEETING OF SHAREHOLDERS AND/OR THE MANAGEMENT BOARD AS SPECIFIED BY THE LEGISLATION OF THE REPUBLIC OF KAZAKHSTAN AND/OR THE CHARTER OF KEGOC JSC.

GRI 2-12, 2-13

According to the Company's Charter, the Board of Directors defines the directions of the Company's activities and approves development strategies, including setting goals, objectives, projects, and performance indicators. In the process of developing/ updating the Development Strategy, the Board of Directors holds regular meetings and consultations with key stakeholder groups to understand their expectations and concerns. The implementation of the Company's Development Strategy, the achievement of goals and indicators, including in the area of sustainable development, is monitored by the Board of Directors on a quarterly basis through reviews of reports on strategy implementation, occupational safety, labor protection and environmental performance, and risk management.

The election of members of the Board of Directors is carried out by the General meeting of shareholders through clear and transparent procedures, taking into account the competencies, skills, achievements, business reputation, and professional experience of the candidates. In accordance with the Corporate governance code and the Company's internal documents, sufficient diversity must be ensured on the Board of Directors, eliminating all forms of harassment or discrimination based on gender, language, race, nationality, religion, sexual orientation, or gender identity, in order to enhance long-term value in line

with ESG principles. The recommended proportion of women on the Board of Directors is at least thirty percent of the total number of Board members.

When re-electing individual Board of Directors members or the entire for a new term, their contribution to the effectiveness of the Board of Directors is taken into consideration.

Independent directors are elected to the Board of Directors who possess sufficient professionalism and independence to make objective and independent decisions, free from the influence of individual shareholders, the Management Board, and other interested parties.

Board members are elected for a term not exceeding three (3) years.

An independent director may not be elected to the Board of Directors for more than nine (9) consecutive years. In exceptional cases, a term exceeding nine (9) years is permitted, provided that such an independent director is elected annually with a detailed explanation of the need for their continued election and the impact of this factor on their decision-making independence.

The rights and duties of the members of the Board of Directors are defined by the Charter of KEGOC JSC.

GRI 2-14

Members of the Board of Directors of KEGOC JSC bear responsibility, as established by the laws of the Republic of Kazakhstan, to the Company and its shareholders for damage caused by their actions and/or inactions, and for losses incurred by the Company, in accordance with the Law of the Republic of Kazakhstan "On Joint Stock Companies."

GRI 2-10

By the resolution of the Annual General meeting of shareholders dated May 2, 2024 (Minutes No. 35), the composition of the Board of Directors was elected for a term of three years in accordance with the Rules for the formation of the Board of Directors, Determination of remuneration and reimbursement of expenses of members of the Board of Directors of KEGOC JSC, taking into account candidates' compliance with selection criteria and qualification requirements.



## COMPOSITION OF THE BOARD OF DIRECTORS

### Composition of the Board of Directors as of January 1, 2024

#### GRI 2-11

- ◆ Yernat Berdigulov — Chairman of the Board of Directors, representative of Samruk-Kazyna JSC (not the Chairman of the Management Board of KEGOC JSC);
- ◆ Nurlan Akhanzaripov — Member of the Board of Directors, Senior Independent Director;
- ◆ Marat Dulkairov — Member of the Board of Directors, Independent Director;
- ◆ Damir Suyentayev — Member of the Board of Directors, Independent Director;
- ◆ Kanysh Moldabayev — Member of the Board of Directors, representative of Samruk-Kazyna JSC;
- ◆ Almat Zhamiev — Member of the Board of Directors, representative of Samruk-Kazyna JSC;
- ◆ Nabi Aitzhanov — Member of the Board of Directors, Chairman of the Management Board of KEGOC JSC.

By resolution of the Annual General Meeting of Shareholders of KEGOC JSC dated May 2, 2024 (Minutes No. 35):

- ◆ The powers of Board member Almat Zhamiev, representative of Samruk-Kazyna JSC, were terminated early;
- ◆ Miras Kiyakov was elected to the Board of Directors of KEGOC JSC as a representative of Samruk-Kazyna JSC.

As of December 31, 2024, the Board of Directors consists of seven (7) members. The Management Board of the Company consists of five (5) members.

### INFORMATION ON MEMBERS OF THE BOARD OF DIRECTORS

(composition of the Board of Directors as of 31 December 2024)



#### GRI 2-11

### Yernat Berdigulov

Chairman of the Board of Directors of KEGOC JSC,  
representative of Samruk-Kazyna JSC

#### Born in 1987, a citizen of the Republic of Kazakhstan.

**First elected** to the Board of Directors of KEGOC JSC by the decision of the General Meeting of Shareholders of KEGOC JSC on November 24, 2021 (Minutes No. 25) as a representative of Samruk-Kazyna JSC.

By resolutions of the General Meeting of Shareholders of KEGOC JSC dated March 10, 2022 (Minutes No. 26) and May 2, 2024 (Minutes No. 35), he was elected as the Chairman of the Board of Directors of KEGOC JSC.

**Does not own shares in KEGOC JSC or its subsidiaries.**

#### Education:

- ◆ 2004-2007: Kazakh National University named after Al-Farabi, Faculty of International Relations, Almaty;
- ◆ 2007-2010: University of Toronto, specializing in Public Policy and International Relations (focus on International Economics);
- ◆ 2015-2018: University of Warwick, UK — Master of Business Administration;
- ◆ 2022-present: Harvard Business School — Program for Leadership Development.

#### Work experience in the last five years:

- ◆ 02/2022-present: Managing Director for Strategy and Asset Management at Samruk-Kazyna JSC;
- ◆ 04/2021-02/2022: Co-Managing Director for Strategy, Sustainable Development, and Digital Transformation at Samruk-Kazyna JSC;
- ◆ 05/2019-04/2021: Project Manager at international consulting firm Whiteshield Partners (variously Senior Analyst, Consultant);
- ◆ 08/2018-04/2019: Analyst at the Asset Management Directorate at Samruk-Kazyna JSC.

#### Concurrent work and membership in Boards of Directors:

- ◆ Chairman of the Board of Directors of KazMunayGas JSC;
- ◆ Chairman of the Board of Directors of QazaqGaz JSC;
- ◆ Member of the Board of Directors of NAC Kazatomprom JSC;
- ◆ Member of the Board of Directors of NC Kazakhstan Temir Zholy JSC.

# INFORMATION ON MEMBERS OF THE BOARD OF DIRECTORS

(composition of the Board of Directors as of 31 December 2024)



Nurlan Akhanzaripov

Senior independent director,  
Chairman of NRC, member of SPCGC and AC  
of KEGOC JSC's Board of Directors

**Born in 1965, a citizen of the Republic  
of Kazakhstan.**

**First elected** to the Board of Directors of KEGOC JSC  
by the decision of the General Meeting of Shareholders  
of KEGOC JSC on June 26, 2020 (Minutes No. 18)  
as an independent director.

By resolutions of the General Meeting of Shareholders  
of KEGOC JSC dated March 10, 2022 (Minutes No. 26)  
and May 2, 2024 (Minutes No. 35), he was elected as the  
Chairman of the Board of Directors of KEGOC JSC.

**Does not own shares in KEGOC JSC or its subsidiaries.**

**Certified Independent Director (Cert IoD) from the  
Institute of Directors, UK.**

## Education:

- ◆ 1991 — Semipalatinsk State University named after  
Shakarim, Accountant-Economist, Accounting and  
Auditing;
- ◆ 1999 — KIMEP MBA, Master of Business  
Administration;
- ◆ 2015 — Satbayev Kazakh National Technical  
University, Geology and Mineral Exploration.

## Work experience in the last five years:

- ◆ 2019-2021: Deputy General Director for Production  
at Planet Care Management LLP.

## Concurrent work and membership in Boards of Directors:

- ◆ Member of the Board of Directors, Independent  
Director of NC KazTransGaz JSC;
- ◆ Member of the Board of Directors, Independent  
Director of NC QazaqGaz JSC;
- ◆ Member of the Board of Directors, Independent  
Director of KTZ Express JSC.



Marat Dulkairov

Independent director, Chairman of SPCGC and  
OHSEPC, member of AC of KEGOC JSC's Board  
of Directors

**Born in 1947, a citizen of the Republic  
of Kazakhstan.**

**Firs elected** to the Board of Directors of KEGOC JSC  
by the decision of the General Meeting of Shareholders  
of KEGOC JSC on July 31, 2023 (Minutes No. 32)  
as a member of the Board of Directors, Independent  
Director.

By resolution of the General Meeting of Shareholders  
of KEGOC JSC dated May 2, 2024 (Minutes No. 35), he  
was elected as a member of the Board of Directors,  
independent director of KEGOC JSC.

**Does not own shares in KEGOC JSC or its  
subsidiaries.**

## Education:

- ◆ 1965-1972: Magnitogorsk mining and metallurgical  
institute named after G.I. Nosov, specializing  
in Power Supply of Industrial Enterprises, Cities, and  
Agriculture, qualification: Electrical Engineer.

## Work experience in the last five years:

- ◆ 04/2015-present: General Director of the Union  
of Engineers and Power Engineers of the Republic  
of Kazakhstan.

## Concurrent work and membership in Boards of Directors:

- ◆ Member of the Board of Directors, Independent  
Director of Almaty Power Stations JSC (AIES);
- ◆ Honorary Professor of the Almaty University  
of Power Engineering and Telecommunications;
- ◆ Honored Power Engineer of the Republic  
of Kazakhstan and CIS.



## INFORMATION ON MEMBERS OF THE BOARD OF DIRECTORS

(composition of the Board of Directors as of 31 December 2024)



**Damir Suyentayev**

Independent director, Chairman of AC, member of NRC of KEGOC JSC's Board of Directors

**Born in 1984, a citizen of the Republic of Kazakhstan.**

**First elected** to the Board of Directors of KEGOC JSC by the decision of the General Meeting of Shareholders of KEGOC JSC on July 18, 2022 (Minutes No. 28) as a member of the Board of Directors, Independent Director.

By decision of the General Meeting of Shareholders of KEGOC JSC dated May 2, 2024 (Minutes No. 35), he was elected as a member of the Board of Directors, Independent Director of KEGOC JSC.

**Does not own shares in KEGOC JSC or its subsidiaries.**

### Education:

- ◆ 2001-2006: Kazakh State Law Academy, specialty in Jurisprudence, Almaty;
- ◆ 2006-2008: Kazakh Economic University named after T. Ryskulov, Bachelor of Economics, Almaty;
- ◆ 2012-2014: Russian Presidential Academy of National Economy and Public Administration, Faculty of Innovation and Technology Business, MBA in Innovation and Project Management, Moscow;
- ◆ 2018-2022: Institute of Directors, UK, IoD Chartered Director Program, London.

Member of the Association of independent directors of the Republic of Kazakhstan, the Russian Federation, the Institute of internal auditors of the Republic of Kazakhstan and listed in the Professional association of Corporate governance of Ukraine.

### Work experience in the last five years:

- ◆ 08/2021-present: President of the National Center for Expertise and Certification JSC;
- ◆ 02/2016-10/2021: Chairman of the Digital Finance Union NGO.

### Concurrent work and membership in Boards of Directors:

- ◆ Member of the Board of Directors, Independent Director of Passenger Transportation JSC/NC Kazakhstan Temir Zholy JSC;
- ◆ Member of the Board of Directors, Independent Director of SEC Almaty JSC.



**Kanysh Moldabayev**

Member of the Board of Directors of KEGOC JSC, Representative of Samruk-Kazyna JSC, Chairman of the SACSD Committee of the Board of Directors of KEGOC JSC

**Born in 1963, a citizen of the Republic of Kazakhstan.**

**First elected** by the decision of the General Meeting of Shareholders of KEGOC JSC on April 27, 2021 (Minutes No. 21) as Chairman of the Board of Directors of KEGOC JSC.

By the decisions of the General Meeting of Shareholders dated November 24, 2021 (Minutes No. 25), July 31, 2023 (Minutes No. 32), and May 2, 2024 (Minutes No. 35), elected as a member of the Board of Directors of KEGOC JSC as a representative of JSC "Samruk-Kazyna".

**Does not own shares in KEGOC JSC or its subsidiaries.**

**Certified Director (Certificate in Company Direction IoD) Institute of Directors, UK.**

### Education:

- ◆ 2016-2020: Doctor of Business Administration (DBA), Russian Presidential Academy of National Economy and Public Administration;
- ◆ 2003-2004: Academy of Public Administration under the President of the Republic of Kazakhstan, Public Service Manager;
- ◆ 1999-2002: Karaganda State Technical University, Economist-Lawyer;
- ◆ 1981-1987: Pavlodar Industrial Institute, Electrical Engineer;
- ◆ International Certification — IPMA Level B.

### Work experience in the last five years:

- ◆ 11/2021-07/2023: Chairman of the Management Board of KEGOC JSC;
- ◆ 04/2021-11/2021: Director of the Energy and Mining Assets Directorate at Samruk-Kazyna JSC;
- ◆ 04/2019-04/2021: Sector Leader 'Energy' at Samruk-Kazyna JSC;
- ◆ 09/2018-04/2019: Deputy General Director of Kazakhstan Nuclear Power Plants JSC.

### Concurrent work and membership in Boards of Directors:

- ◆ Member of the Supervisory Board, independent director of SFCS of RES LLP;
- ◆ Member of the Board of Directors of Samruk-Energy JSC, representative of Samruk-Kazyna JSC.

# INFORMATION ON MEMBERS OF THE BOARD OF DIRECTORS

(composition of the Board of Directors as of 31 December 2024)



Miras Kiyakov

Member of the Board of Directors of KEGOC JSC, representative of Samruk-Kazyna JSC, member of the NRC.

**Born in 1990, a citizen of the Republic of Kazakhstan.**

**First elected** to the Board of Directors of KEGOC JSC by the decision of the General Meeting of Shareholders of KEGOC JSC on May 2, 2024 (Minutes No. 35) as a member of the Board of Directors, representative of Samruk-Kazyna JSC.

**Does not own shares in KEGOC JSC or its subsidiaries.**

## Education:

- ◆ 2008–2012 — Almaty University of Power Engineering and Telecommunications, Almaty (Electric Power Engineering, Bachelor of Engineering and Technology);
- ◆ 2012–2014 — Almaty University of Power Engineering and Telecommunications (Electric Power Engineering, Master of Engineering and Technology);
- ◆ 2015–2017 — Almaty Management University (Bachelor of Economics and Business).

## Work experience in the last five years:

- ◆ 02/2024–present — Head of the Energy Assets Sector, Department of Energy and Mining Assets, Samruk-Kazyna JSC;
- ◆ 04/2023–01/2024 — Kazakhstan Investment Development Fund (KIDF) — Director of the Department of Infrastructure Projects;
- ◆ 10/2021–04/2023 — Kazakhstan Investment Development Fund (KIDF) — Analyst, Senior Analyst;
- ◆ 01/2021–10/2021 — Kazakhstan Investment Development Fund (KIDF) — Project Manager;
- ◆ 08/2019–01/2021 — Kristall Management JSC — Lead Electrical Engineer.

## Concurrent work and membership in Boards of Directors:

- ◆ Chairman of the Board of Directors of AstanaGas KMG JSC;
- ◆ Member of the Board of Directors of Moynak HPP JSC;
- ◆ Member of the Board of Directors of Qazaq Green Power PLC JSC.



Nabi Aitzhanov

Member of the Board of Directors of KEGOC JSC, Chairman of the Management Board KEGOC JSC

**Born in 1980, a citizen of the Republic of Kazakhstan.**

**First elected** to the Board of Directors of KEGOC JSC by the decision of the General Meeting of Shareholders of KEGOC JSC on July 31, 2023 (Minutes No. 32) as a Chairman of the Management Board.

By the decision of the General Meeting of Shareholders of KEGOC JSC dated May 2, 2024 (Minutes No. 35) elected as a member of the Board of Directors of KEGOC JSC.

**Does not own shares in KEGOC JSC or its subsidiaries.**

## Education:

- ◆ 1997-2002: Akmola Agrarian University named after S. Seifullin, Economics and Management;
- ◆ 2011-2012: International Academy of Business, Master of Business Administration.

## Work experience in the last five years:

- ◆ 2010-2023: General Director of Kazakhstan Utility Systems LLP.

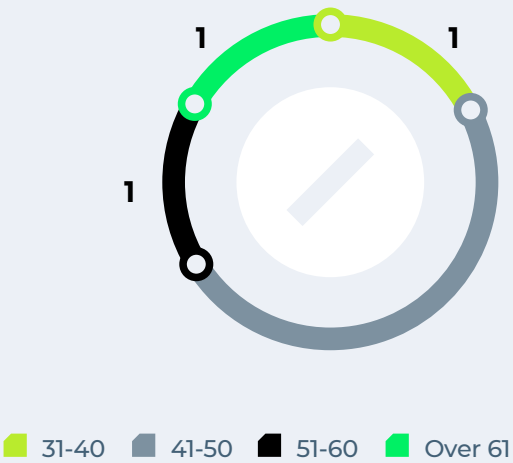
## Concurrent work and membership in Boards of Directors:

- ◆ Member of the Energy Committee of the National Chamber of Entrepreneurs of the Republic of Kazakhstan “Atameken”;
- ◆ Member of the Board of Directors of the Kazakhstan Electricity Association;
- ◆ Member of the Council of the Legal Entity Association “Kazakhstan Association of Oil, Gas and Energy Sector Organizations “KAZENERGY”.



THE TERM OF OFFICE OF EACH MEMBER OF THE BOARD OF DIRECTORS OF KEGOC JSC COINCIDES WITH THE TERM OF OFFICE OF THE BOARD OF DIRECTORS OF KEGOC JSC AS A WHOLE, WHICH EXPIRES IN MAY 2027. ACCORDINGLY, THE AVERAGE TENURE ON THE BOARD OF DIRECTORS IS 3 YEARS. THE COMPOSITION OF THE BOARD OF DIRECTORS DOES NOT ENSURE GENDER DIVERSITY.

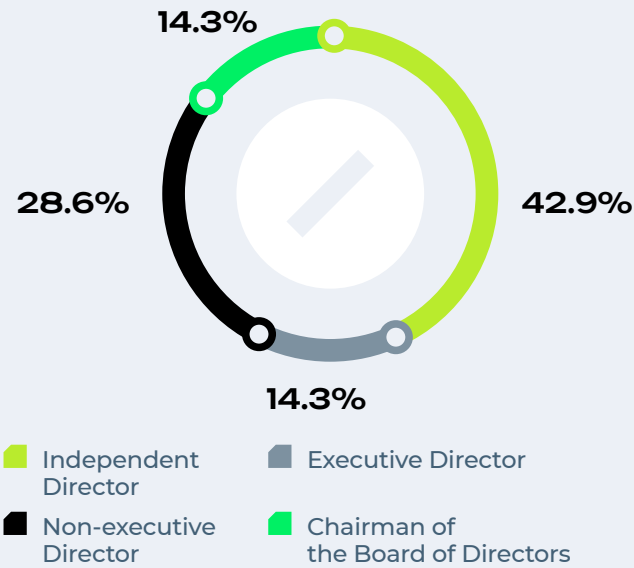
Age structure of the Board of Directors, persons



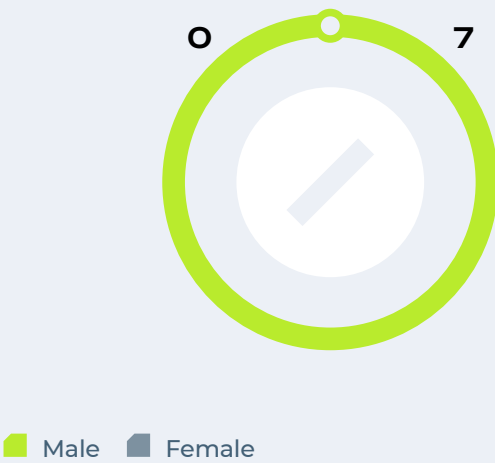
Structure of the Board of Directors

GRI 405-1

Independence of the board of directors, %



Age structure of the Board of Directors, persons





COMPETENCE OF THE BOARD OF DIRECTORS MEMBERS

Competences matrix of the Board of Directors

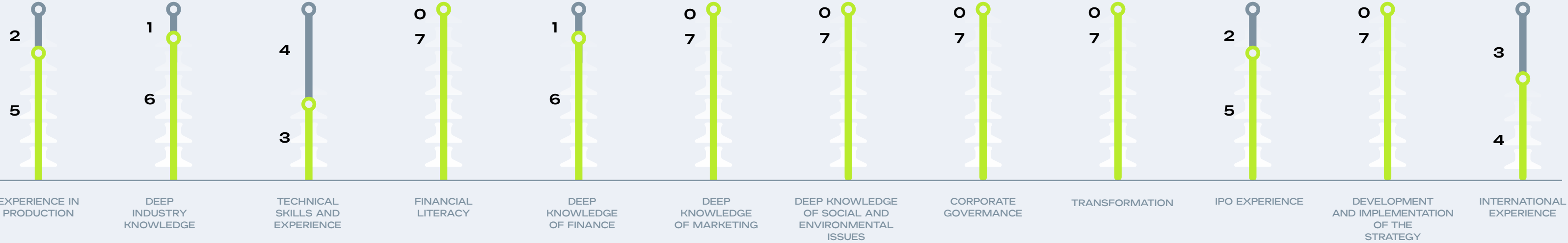
GRI 2-9, 2-10

Members of the Board of Directors	Berdigulov E.	Akhanzaripov N.	Dulkairov M.	Suyentayev D.	Moldabayev K.	Kiyakov M.	Aitzhanov N.
Length of service in the industry/general experience, years	10/13	22/31	59/59	6/18	32/37	11/12	23/23
Key competences							
Industry knowledge							
Industry experience	–	–	+	–	+	+	+
In-depth knowledge of the industry	+	+	+	+	+	+	+
Technical skills/experience	–	+	+	–	+	+	+
Specific skills and experience							
Financial Literacy	+	+	+	+	+	+	+
Strong knowledge of finance	+	+	–	+	–	+	+
Strong knowledge of marketing	+	+	+	+	+	–	+
In-depth knowledge of social and environmental issues	+	+	+	+	+	+	+
Management and legal experience							
Corporate governance	+	+	+	+	+	+	+
Transformation	+	+	–	+	+	–	+
IPO experience	+	+	–	+	+	–	+
Strategy development and implementation	+	+	+	+	+	+	+
International experience	+	+	–	+	–	–	–

\* The competences of the members of the Board of Directors are shaded in blue colour.



Balance of qualifications of members of the Board of Directors



CRITERIA FOR SELECTING INDEPENDENT DIRECTORS

An independent director must possess sufficient professionalism and independence to make independent and objective decisions free from the influence of individual shareholders, the Management Board, and other interested parties.

Independent directors meet all the legal criteria for independence; their status, powers, rights, and duties are strictly regulated by the requirements of the Law of the Republic of Kazakhstan 'On Joint

Stock Companies,' the Charter of KEGOC JSC, the Corporate Governance Code of KEGOC JSC, and the Rules for Selecting and Electing Members of the Board of Directors of KEGOC JSC.

According to global corporate governance practice, the number of members of the Board of Directors should be 7-11 persons. At least 30% but not more than 50% of the Company's Board of Directors should be independent directors.

Upon election, independent directors sign statements on their independence that comply with the requirements for independent directors established by law and the Company's internal policies, confirming that they:

- ◆ are not affiliated persons<sup>3</sup> of the company and have not been affiliated persons for three years preceding their election to the Board of Directors;
- ◆ are not affiliated persons in relation to affiliated persons of KEGOC JSC;
- ◆ are not subordinate to the officers of KEGOC JSC or its affiliated organizations and have not been subordinate to these persons for three years preceding their election to the Board of Directors;

- ◆ do not participate in the audit of KEGOC JSC as an auditor working in an audit organization and have not participated in such an audit for three years preceding their election to the Board of Directors;
- ◆ are not representatives of a shareholder at meetings of the bodies of KEGOC JSC and have not been representatives for three years preceding their election to the Board of Directors;
- ◆ are not public servants.

<sup>3</sup> affiliated persons — individuals or legal entities (except for state bodies exercising control and supervisory functions within the scope of powers granted to them) that have the ability to directly and (or) indirectly determine decisions and (or) influence decisions made by each other (one of the persons), including by virtue of a concluded transaction.

In accordance with the legislation of the Republic of Kazakhstan affiliated persons include:

- major shareholders, founders or participants;
- officials of organizations;
- close relatives;
- legal entities controlled by a major shareholder of a JSC, founder or participant of an LLP;
- subsidiary organizations, etc.

## MEETINGS OF THE BOARD OF DIRECTORS OF KEGOC JSC

DURING THE REPORTING PERIOD, THE BOARD OF DIRECTORS HELD 12 IN-PERSON MEETINGS AND 1 MEETING IN ABSENTIA, AT WHICH 119 ISSUES WERE CONSIDERED.

The Corporate governance code and the documents regulating the activities of the Company’s Board of Directors establish mandatory attendance requirements for Board of Directors meetings, as well as the obligation of the Board of Directors to recommend

to the General meeting of shareholders the early termination of a Board of Directors member’s powers if they attend less than 50% of the meetings during the reporting year and submit ballots for fewer than 50% of the issues put to absentee voting.

Participation matrix for Board meetings in 2024

Members of the Board of Directors	31.01.2024	27.02.2024	29.03.2024	27.04.2024	21.05.2024	28.05.2024	26.06.2024	09.07.2024	06.09.2024	04.10.2024	09.11.2024	13.12.2024	19.12.2024	%
Yernat Berdigulov Chairman of the Board of Directors	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Nurlan Akhanzaripov Senior Independent Director	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Marat Dulkaurov Independent Director	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Damir Suyentayev Independent Director	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Almat Zhamiyev Representative of Samruk-Kazyna JSC	+	+	+	+	terminated from 2 May 2024									100
Miras Kiyakov Representative of Samruk-Kazyna JSC	was not a member of the BoD				+	+	+	-	+	+	+	+	+	88.8*
Kanysh Moldabayev Representative of Samruk-Kazyna JSC	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Nabi Aitzhanov Chairman of the Management Board	+	+	+	+	+	+	+	+	+	+	+	+	+	100
Total (%)														98.4

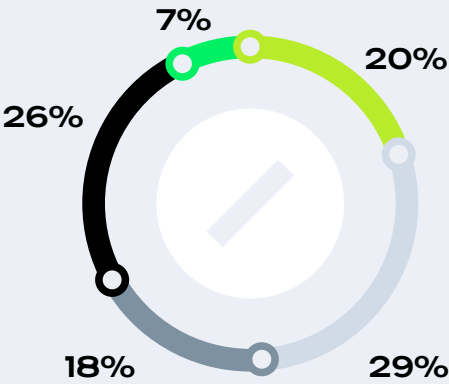
\* Member of the Board of Directors of KEGOC JSC, M.K. Kiyakov, was absent from the meeting on 9 July 2024 due to being on annual leave; however, he participated in the meeting of the Nomination and Remuneration Committee held on 9 July 2024 at 10:00 a.m. via video conference.



IN 2024, THE MEETINGS OF THE BOARD OF DIRECTORS ADDRESSED MATTERS RELATED TO STRATEGY, FINANCIAL AND ECONOMIC PERFORMANCE, INVESTMENT ACTIVITIES, CORPORATE GOVERNANCE AND SUSTAINABLE DEVELOPMENT, RISK MANAGEMENT, INTERNAL CONTROL AND AUDIT, HUMAN RESOURCES POLICY, THE ACTIVITIES OF SUBSIDIARIES, AND OTHER ISSUES.

Issues considered at the meetings of the Board of Directors in 2024

GRI 2-13



- Strategic, financial, economic and investment issues
- Corporate governance and sustainable development issues
- Risk management, internal control and audit issues
- Personnel policy issues
- Issues of subsidiaries



COMMITTEES OF THE BOARD OF DIRECTORS

To provide a platform for active discussion and detailed analysis of specific matters, three committees have been established under the Board of Directors:

- Audit committee;
- Nomination and remuneration committee;
- Strategy, corporate governance and sustainable development committee.

AUDIT COMMITTEE

GRI 2-9, 2-10, 2-13

The activities of the Committee are regulated by the Regulations on the Audit Committee approved by the decision of the Board of Directors of KEGOC JSC dated 30 November 2018 (Minutes No. 12).

The Committee is fully accountable to the Board of Directors. The members of the Committee are elected by the Board of Directors, the Chairman of the Committee is an independent director, and the Committee also includes a non-voting expert who provides recommendations to the Committee based on the policies and vision of Samruk-Kazyna JSC as a major shareholder of the Company.

All members of the Committee possess sufficient knowledge and experience, including practical experience.

The Audit Committee consists of three independent directors and one expert (non-voting).

As of 1 January 2024, the Committee included the following members:

- Damir Suyentayev — Chairman of the Committee, Independent Director;
- Nurlan Akhanzaripov — Member of the Committee, Senior Independent Director;
- Marat Dulkairov — Member of the Committee, Independent Director;
- Maksat Myrzatay — Expert (non-voting).

In accordance with the decision of the Board of Directors dated 6 September 2024 (Minutes No. 9), changes were made to the composition of the Committee.

As of 31 December 2024, the Committee included the following members:

- Damir Suyentayev — Chairman of the Committee, Independent Director;
- Nurlan Akhanzaripov — Committee member, Senior Independent Director;
- Marat Dulkairov — Committee member, Independent Director;
- Manar Orazov — Expert (non-voting).

Participation of Audit Committee members in meetings in 2024

Members of the Audit Committee	30.01.2024	26.02.2024	28.03.2024	26.04.2024	27.05.2024	25.06.2024	09.07.2024	28.08.2024	02.10.2024	05.11.2024	19.12.2024	%
Damir Suyentayev Chairman of the Committee, Independent Director	+	+	+	+	+	+	-	+	+	+	+	91*
Nurlan Akhanzaripov Member of the Committee, Senior Independent Director	+	+	+	+	+	+	+	+	+	+	+	100
Marat Dulkaurov Member of the Committee, Independent Director	+	+	+	+	+	+	+	+	+	+	+	100

\* Member of the Board of Directors of KEGOC JSC, Damir Suyentayev, was absent from the meeting on 9 July 2024 due to being on annual leave (at the time of the meeting at 11:00 a.m., he was in flight). However, he participated in the Board of Directors meeting held on 9 July 2024 at 3:00 p.m. via video conference.

GRI 2-13

In 2024, the Committee held 11 in-person meetings, at which 63 issues were considered.

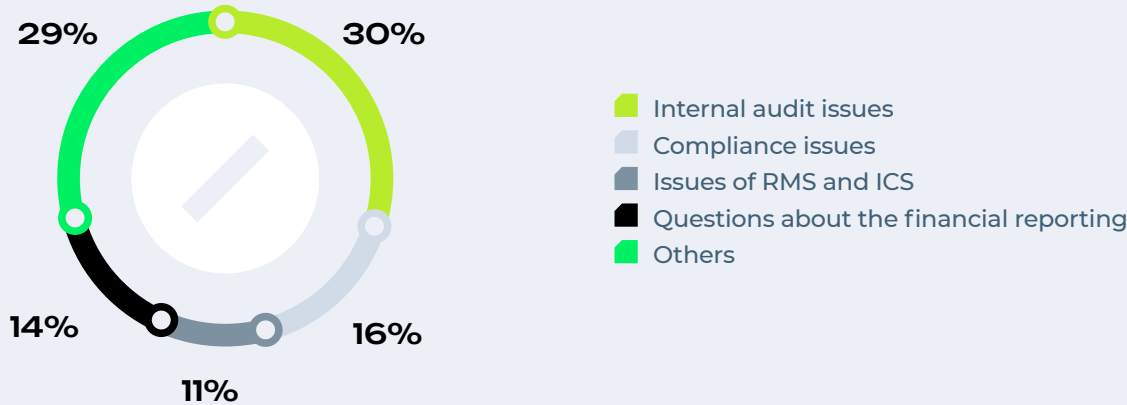
The Committee provided the Board of Directors with recommendations on matters of internal control and risk management, financial reporting, including meetings with representatives of the external auditor responsible for auditing the financial statements of KEGOC JSC, activities of the Internal Audit Service and the Compliance Service, as well as other matters, including those related to the approval of interested party transactions and major transactions.

During 2024, three meetings were held with representatives of the external auditor RSM Qazaqstan LLP, where reports were reviewed on the

results of interim procedures for the audit of the consolidated financial statements for 2023, the audit results of the consolidated financial statements for 2023, and the audit results of the interim consolidated financial statements for the first six months of 2023, including matters related to the confirmation of the external auditor's independence.

In addition, during 2024, Committee members participated in meetings of the Selection Commission for identifying a candidate for the vacant position of Head of the Compliance Service of KEGOC JSC, as well as the Commission for determining the strategy and implementation of the unified procedure for selecting an audit organization to provide financial audit services for the KEGOC JSC group of companies.

Issues considered at Audit committee meetings in 2024, %





NOMINATION AND REMUNERATION COMMITTEE

GRI 2-9, 2-10, 2-13

The activities of the Committee are regulated by the Regulations on the Nomination and Remuneration Committee. The Committee is fully accountable to the Board of Directors.

All members of the Committee possess sufficient knowledge and extensive experience, including practical experience.

As of 1 January 2024, the Committee included the following members:

- ◆ Nurlan Akhanzaripov — Chairman of the Committee, Lead Independent Director;
- ◆ Damir Suyentayev — Committee member, Independent Director;
- ◆ Almat Zhamiev — Committee member, Representative of Samruk-Kazyna JSC;
- ◆ Syrym Tyutebaev — Expert (non-voting).

In accordance with the decisions of the Board of Directors dated 21 May 2024 (Minutes No. 5), changes and additions were made to the Committee’s composition.

As of 31 December 2024, the Committee included the following members:

- ◆ Nurlan Akhanzaripov — Chairman of the Committee, Senior Independent Director;
- ◆ Damir Suyentayev — Committee member, Independent Director;
- ◆ Miras Kiyakov — Committee member, Representative of Samruk-Kazyna JSC;
- ◆ Syrym Tyutebaev — Expert (non-voting).

Matrix of attendance at meetings of the Nomination and remuneration committee in 2024

Members of the Nomination and remuneration committee	30.01.2024	26.02.2024	28.03.2024	26.04.2024	27.05.2024	09.07.2024	28.08.2024	02.10.2024	05.11.2024	19.12.2024	%
Nurlan Akhanzaripov Chairman, Senior Independent Director	+	+	+	+	+	+	+	+	+	+	100
Damir Suyentayev Independent Director	+	+	+	+	+	+	+	+	+	+	100
Almat Zhamiev Representative Samruk-Kazyna JSC	+	+	+	+	terminated from 21 May 2024						100
Miras Kiyakov Representative Samruk-Kazyna JSC	not a member of the Committee				+	+	+	+	+	+	100
Total											100

GRI 2-13

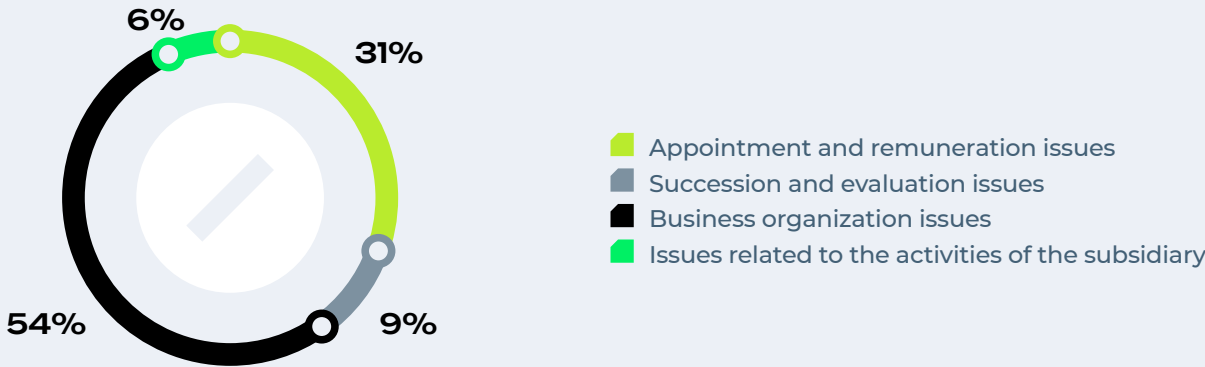
In 2024, the Committee held 10 in-person meetings, at which 48 issues were considered.

During the reporting period, the Committee provided the Board of Directors with recommendations on the appointment/election of candidates to the Board of Directors and the position of Corporate Secretary; approval of the Company’s organizational structure;

implementation of the Management Pool; review of key performance indicators of the Management Board members and the target map for the Corporate Secretary and Ombudsperson; salary structure of the Management Board, Ombudsperson, and Corporate Secretary; approval of the Training Plan for the Board of Directors, and other matters.

No deviations by the Board of Directors from individual proposals/recommendations of the Committee were recorded in the course of reviewing issues in 2024.

Issues considered at NRC meetings in 2024, %



STRATEGY, CORPORATE GOVERNANCE AND SUSTAINABLE DEVELOPMENT COMMITTEE

GRI 2-9, 2-10, 2-13

The activities of the Committee are regulated by the Regulations on the Strategy, Corporate Governance and Sustainable Development Committee. The Committee is fully accountable to the Board of Directors. The Committee is chaired by an independent director.

All members of the Committee possess sufficient knowledge and significant experience, including practical experience.

As of 31 December 2024, the Committee included the following members:

- ◆ Kanysh Moldabayev — Chairman of the Committee, Representative of Samruk-Kazyna JSC;
- ◆ Nurlan Akhanzaripov — Committee member, Senior Independent Director;
- ◆ Marat Dulkairov — Committee member, Independent Director;
- ◆ Syrym Tyutebaev — Expert (non-voting).

Participation matrix of the strategy, corporate governance and sustainable development committee in 2024 meetings

Members of the Strategy, Corporate and Sustainable Development Committee	30.01.2024	26.02.2024	28.03.2024	26.04.2024	27.05.2024	28.08.2024	02.10.2024	05.11.2024	19.12.2024	%
Moldabaev Kanysh Chairman, representative of Samruk-Kazyna JSC	+	+	+	+	+	+	+	+	+	100
Akhanzaripov Nurlan Senior Independent director	+	+	+	+	+	+	+	+	+	100
Dulkairov Marat Independent director	+	+	+	+	+	+	+	+	+	100
Total										100

GRI 2-13

During the reporting period, the Committee held 9 in-person meetings, at which 27 issues were considered.

During the reporting period, the Committee provided the Board of Directors with recommendations on the updated version of the Development Plan (Strategy); Action Plan (Business Plan), its monitoring and implementation report; reports on the implementation of action plans to improve ESG principles; the new version of the KEGOC JSC Corporate Governance Code; implementation of major investment projects; occupational health and safety,

labor protection, and environmental issues; disclosure report of KEGOC JSC; KEGOC JSC's participation in the establishment of a legal entity in the Republic of Azerbaijan within the framework of the green energy development and transmission project between the Republic of Azerbaijan, the Republic of Kazakhstan, and the Republic of Uzbekistan; and other matters.

No deviations by the Board of Directors from individual proposals/recommendations of the Committee were recorded in the course of reviewing issues in 2024.

Issues considered at meetings of the Strategy, corporate governance and sustainable development committee in 2024





PROFESSIONAL  
DEVELOPMENT

GRI 2-17

In 2024, the members of the Board of Directors of KEGOC JSC participated in a number of events aimed at enhancing their professional competence and managerial skills:

1. On 28 February 2024, Board members participated in the Corporate governance forum “Development paths in a new world”, Moscow, Russian Federation.
2. On 28 March 2024, Board members attended the official launch of Chapter Zero Kazakhstan in the Trading Hall conference room of the AIFC.
3. On 27 April 2024, a Strategic Session was held in Almaty with the participation of Board members, the Management Board, and Managing Directors of KEGOC JSC.
4. On 2 May 2024, Board of Directors members participated in the Annual General Meeting of Shareholders of KEGOC JSC.
5. On 24 June 2024, a training was held in Almaty for Board of Directors members on the topics “Climate Risk Management” and “Application of Artificial Intelligence in a Power Grid Company”.
6. On 27 June 2024, a training was conducted for Board of Directors members on the topic: “ESG: New International and Kazakhstani Regulatory Requirements. Responsibilities and Obligations”.
7. On 15 October 2024, Board of Directors members participated in a webinar: “Key Trends in Adapting Various Business Sectors to Climate Change”.
8. On 7 November 2024, Board of Directors members took part in the National Forum “Corporate Governance — The Imperative of Economic Liberalization in the Republic of Kazakhstan”.
9. On 19 November 2024, Board of Directors members attended “KEGOC JSC Issuer Day” in Astana at the AIX platform.
10. On 21 November 2024, Board of Directors members attended “KEGOC JSC Issuer Day” in Almaty at the KASE platform.

CONFLICT OF INTEREST

GRI 2-15

In accordance with the Code of business ethics and the Conflict of interest management Policy of KEGOC JSC, one of the necessary conditions for an employee to effectively perform their duties is the absence of any conflict between their personal interests and those of the Company. In cases where such conflicts exist, they must be disclosed and resolved in a timely manner. All employees and officers of KEGOC JSC must conduct themselves in a way that avoids any situation where a conflict of interest may arise either for themselves (or related parties) or for others.

In 2024, no cases of conflict of interest by officers or employees of the Company were recorded:

- ◆ no situations arose in which personal interest could have affected the proper fulfillment of their duties;
- ◆ no situations occurred where conflicts of interest affected or could potentially affect impartial decision-making;
- ◆ officials with an interest did not participate in the discussion and decision-making process on such matters.

As a preventive measure, under the Conflict of interest management policy for officers and employees of KEGOC JSC, a conflict of interest disclosure declaration form is in effect. In the discussion and voting on interested

party transactions within the competence of the Board of Directors in 2024, only independent directors participated, as recorded in the meeting minutes of the Board of Directors.

In the reporting year, the Board of Directors of KEGOC JSC made decisions on the conclusion of interested party transactions by signing three contracts for the provision of operational and maintenance services for equipment between KEGOC JSC branches and Batys Transit JSC, totaling KZT 438 million.

In 2024, two major transactions were concluded by KEGOC JSC with:

- ◆ the European Bank for Reconstruction and Development for a total amount of KZT 141 billion;
- ◆ a consortium consisting of EIS Corporation LLP, Building and construction LLP, and Scientific-Engineering Center Energy LLP for a total amount of KZT 138 billion.

# MANAGEMENT BOARD

GRI 2-13

THE DAY-TO-DAY OPERATIONS OF KEGOC JSC ARE MANAGED BY A COLLEGIAL EXECUTIVE BODY — THE MANAGEMENT BOARD, WHICH MAKES DECISIONS ON MATTERS THAT DO NOT FALL WITHIN THE COMPETENCE OF OTHER GOVERNING BODIES.

The Management Board operates in accordance with the Law of the Republic of Kazakhstan “On Joint Stock Companies,” the Charter of KEGOC JSC, the Corporate Governance Code, and the Regulations on the Management Board of KEGOC JSC.

The appointment (election) and early termination of the powers of the Chairman of the Management Board fall under the competence of the General Meeting of Shareholders. The determination of the number of members, the term of office of the Management Board, the election of its members (except for the Chairman), as well as the early termination of their powers, fall within the exclusive competence of the Board of Directors of KEGOC JSC and are based on the principles of transparency, objective assessment of potential, professionalism, and competence.

The Board of Directors of KEGOC JSC has determined the composition of the Management Board to include 5 (five) members, 100% of whom are citizens of the Republic of Kazakhstan.

## COMPOSITION OF THE MANAGEMENT BOARD

(As at 31 December 2024)



Nabi Aitzhanov

Chairman of the Management Board of KEGOC JSC, member of the Management Board since August 2023

Born in 1980, citizen of the Republic of Kazakhstan, 22 years of industry experience.

### Education:

- ◆ Akmola Agricultural University named after S. Seifullin, Economics and Management (1997–2002); International Academy of Business, Master of Business Administration (2012).

### Work experience in the last five years:

- ◆ 2010–2023 — General Director, Kazakhstan Utility Systems LLP;
- ◆ 2023 — Chairman of the Management Board of KEGOC JSC.

### Responsibilities at KEGOC JSC:

- ◆ General management of KEGOC JSC, ensuring occupational health and safety, environmental protection, economic, technical and information security, and project portfolio management.

**Does not own shares in KEGOC JSC or its subsidiaries/affiliates.**



## COMPOSITION OF THE MANAGEMENT BOARD

(As at 31 December 2024)



**Bakytzhan Zhazykbayev**

Deputy Chairman of the Management Board of KEGOC JSC, member of the Management Board since February 2017

**Born in 1968, citizen of the Republic of Kazakhstan, 21 years of industry experience.**

### Education:

- ◆ Kazakh State Academy of Management named after T. Ryskulov, Marketing and Commerce (1994); Pavlodar State University named after S. Toraigyrov, Electric Power Systems and Networks (2005); Narxoz University JSC, MBA (2017).

### Work experience in the last five years:

- ◆ 2017–2018 — Managing Director for production asset management, KEGOC JSC;
- ◆ 2018–2021 — Managing Director for production, KEGOC JSC;
- ◆ 2021 — Deputy Chairman of the Management Board, KEGOC JSC.

### Responsibilities at KEGOC JSC:

- ◆ Operation, repair and maintenance of production assets, ensuring reliability and sustainability of the Unified Power System of Kazakhstan, modernization of relay protection systems and automation, metrology, strategic projects, ITC development, coordination with branches and subsidiaries.

**Does not own shares in KEGOC JSC or its subsidiaries/affiliates.**



**Tolegen Safuani**

Managing Director for HR, legal support and risk management, member of the Management Board since June 2017

**Born in 1979, citizen of the Republic of Kazakhstan, 16 years of industry experience.**

### Education:

- ◆ Kazakh State Law Academy, Law (1996–2000); Kazakh University of Technology and Business, Public and Local Administration, Master of Economics (2011–2013); Almaty Management University, MBA (2018).

### Work experience in the last five years:

- ◆ 2017 — Managing Director for legal support and risk management, KEGOC JSC.

### Responsibilities at KEGOC JSC:

- ◆ Compliance with Kazakh legislation, legal work, risk management, internal control, business continuity, risk culture, HR policy development, corporate culture and labor relations, IR development, government and public engagement;
- ◆ Member of the Board of Directors of Energoinform JSC.

**Does not own shares in KEGOC JSC or its subsidiaries/affiliates.**

COMPOSITION OF THE MANAGEMENT BOARD

(As at 31 December 2024)



Elvira Konakhbayeva

Managing Director for Strategy and sustainable development, member of the Management Board since January 2022

Born in 1987, citizen of the Republic of Kazakhstan, 2 years of industry experience.

Education:

- ◆ KIMEP University, Economics (2003–2007).

Work experience in the last five years:

- ◆ 2015–2022 — Senior Manager and Director of the Corporate governance department, Samruk-Kazyna JSC;
- ◆ 2022 — Managing Director for strategy, sustainable development and digital transformation, KEGOC JSC.

Responsibilities at KEGOC JSC:

- ◆ Corporate strategy, sustainable development, corporate governance, enterprise automation system, process management system, communications.

Does not own shares in KEGOC JSC or its subsidiaries/affiliates.



Aigul Akimbayeva

Managing Director for economics and finance, member of the Management Board since May 2022

Born in 1978, citizen of the Republic of Kazakhstan, 15 years of industry experience.

Education:

- ◆ Abai Almaty State University, Finance and Credit, Banking (1999); MIRBIS Moscow International Higher School of Business, MBA (2009).

Work experience in the last five years:

- ◆ 2008–2021 — Director of Department in Samruk-Energy JSC;
- ◆ 2021–2022 — Co-Managing Director for economics and finance, Samruk-Energy JSC.

Responsibilities at KEGOC JSC:

- ◆ Financial and economic activities, long-term forecasting and business development opportunities, short-/medium-/long-term planning, balance and cash flow forecasts, investor relations, cooperation with the National Bank, KASE, banks, insurers, rating agencies, auditors, and oversight of KEGOC JSC's listing on KASE and AIX, consolidated annual audited financial statements

Does not own shares in KEGOC JSC or its subsidiaries/affiliates.

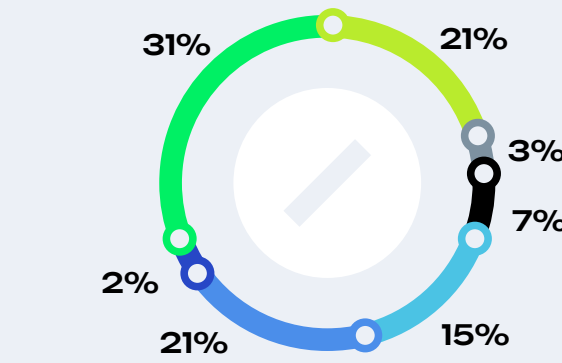


## REPORT ON THE ACTIVITIES OF THE MANAGEMENT BOARD

The core principles guiding the activities of the Management Board are the maximum observance of shareholders' interests, integrity, honesty, professionalism, prudence, objectivity, reasonableness, and consistency.

In 2024, the Management Board of KEGOC JSC held 37 meetings, during which 161 issues were considered.

Structure of issues considered by the Management Board of KEGOC JSC, %



- Strategic, financial, economic and investment issues
- Corporate governance and sustainable development
- Risk management, internal control and audit issues
- Personnel policy issues
- IRD
- Issues related to the activities of subsidiaries
- Other issues

## COMMITTEES UNDER THE MANAGEMENT BOARD

To ensure preliminary review, collective decision-making, and preparation of recommendations for the Management Board of KEGOC JSC on supervised issues, the Company operates consultative-advisory bodies:

- Investment committee;
- Risk committee;
- Budget committee;
- Human capital development committee;
- Committee for working with debtors and creditors;
- Committee for working with inventory.

## MANAGEMENT EVALUATION AND REMUNERATION

### GRI 2-18

On 4 October 2024 (Minutes No. 10), the Board of Directors adopted a decision to conduct an evaluation of the performance of the Board of Directors and its Committees, the Chairman and members of the Board of Directors, and the Corporate Secretary of KEGOC JSC for 2024, through the engagement of an independent professional organization.

In accordance with the Rules for Evaluating the Performance of the Board of Directors and its Committees, the Chairman, members of the Board of Directors, and the Corporate Secretary of KEGOC JSC, none of the directors were involved in the process of evaluating their own performance, except for participating in the questionnaire.

### GRI 2-19

In accordance with the Rules for the Formation of the Composition of the Board of Directors of KEGOC JSC, Determination of Remuneration and Compensation of Expenses of the Members of the Board of Directors of KEGOC JSC, approved by the General Meeting of Shareholders, directors' remuneration consists of two components: annual fixed remuneration and additional remuneration for chairing or participating in in-person meetings of the Board Committees. At the same time, in accordance with the resolution of the General Meeting of Shareholders dated 26 June 2020 (Minutes No. 18), payments of additional remuneration to directors for participation in in-person Committee meetings have been suspended.

To develop a proposal for the General Meeting of Shareholders, the Nomination and Remuneration Committee provides the Board of Directors with recommendations on the amount, procedure, and conditions for paying remuneration to Board members, based on the results of relevant analysis (benchmarking). The majority of the Committee members are independent directors.

### GRI 2-20

Directors are reimbursed for expenses related to travel for meetings of the Board of Directors and its Committees, as well as for business trips outside their place of permanent residence: transportation, including transfers, accommodation, per diem allowances, telephone communication (excluding mobile communication) within the Republic of Kazakhstan, scanning, photocopying, fax, printing, internet access services in the Republic of Kazakhstan, courier and postal services. In accordance with the Corporate governance code of KEGOC JSC, none of the members of the Board of Directors participated in making decisions related to their own remuneration in 2024.

### GRI 2-18, 2-19, 2-20

The remuneration system for the Chairman and members of the Management Board includes a fixed salary and an annual performance-based bonus. Annual bonuses at KEGOC JSC are paid within the limits of the budget allocated for this purpose and only after approval of the financial and operating results based on audited financial statements. A key condition for the payment of bonuses is the presence of consolidated net profit for the reporting year.

The performance evaluation of the Chairman and members of the Management Board is based on motivational KPIs, developed by cascading KEGOC JSC's strategic goals into specific indicators for the Company's business processes/areas in the form of KPI maps for each Management Board member. Motivational KPIs are divided into corporate and functional KPIs, with target values approved by the Board of Directors of KEGOC JSC.

Throughout the year, monitoring of the implementation of motivational KPIs for executives is carried out. After the reporting year ends, actual values of KPIs at all levels are calculated.

Members of the Management Board were eligible for annual performance-based remuneration only if they actually served in their respective positions during the reporting period, except for periods under disciplinary action.

Key motivational KPIs

Strategic Goal 1	Strategic Goal 2	Strategic Goal 3
GA (Grid Availability, in % per year)	EBITDA margin	LTIFR
Number of technological disturbances on PTL and substations	TSR	Level of social stability of KEGOC
Implementation of priority investment projects	Planning quality	Implementation of measures of KEGOC's ESG Principles Improvement Plan
Implementation of the project "Development of algorithms in the ACS SCADA for the management of energy storage systems"	Achievement of target values for financial stability indicators	Fulfilment of activities of the ESG Compliance Plan
	Credit rating	ESG rating

For 2023, the target values of the corporate KPIs were achieved.

In 2024, there were no cases of refusals or agreements on refusal of remuneration or future remuneration by members of the Board of Directors. Therefore, remuneration of key management

personnel and all other related expenses (taxes, contributions, sick leave, vacation pay, material assistance and other) included in payroll expenses in the audited consolidated financial statements amounted to KZT 650.35 million for the year ended December 31, 2024.

ESG KPIS OF THE MANAGEMENT BOARD

Special attention in the management incentive system is given to sustainable development and climate-related aspects. The approved motivational KPIs for 2024 include the following ESG indicators:

1. "Implementation of the ESG Compliance Plan", which includes actions to manage climate impacts, reduce climate risks, and implement environmental initiatives;
2. "Implementation of priority investment projects", aimed at effectively integrating the growing share

- of renewable energy sources (RES) into the power system, with RES expected to reach a 50% share by 2050;
3. "Implementation of the project 'Development of algorithms in the ACS SCADA for the management of energy storage systems'", contributing to KEGOC JSC's mission of maintaining system reliability and efficient regulation of intermittent RES generation.

These initiatives represent KEGOC JSC's contribution to achieving carbon neutrality in the Republic of Kazakhstan by 2060.

# CORPORATE ETHICS

Corporate ethics is a key element uniting our employees.

Its purpose is to regulate relationships within a single team and is based on universally accepted human values:

- ◆ competence and professionalism — employees are expected to possess quality education, relevant experience, decision-making skills, and a drive for professional development;
- ◆ honesty and impartiality — essential for maintaining the Company's reputation and preventing conflicts between personal interests and professional duties;

- ◆ responsibility — as a guarantee of the quality of the Company's activities;
- ◆ respect for human dignity — every KEGOC JSC employee is entitled to fair and equitable treatment regardless of race, language, political and religious beliefs, gender, nationality, or cultural background;
- ◆ safety — ensuring the confidentiality of commercial information and providing safe and healthy working conditions.

## CODE OF CONDUCT

GRI 2-23.2-24

The Code of Conduct (Business Ethics) is mandatory for all employees of the Company, including senior executives. It is a set of practical rules that every employee must follow in their daily work.

The Code is based on accepted norms of corporate ethics and business behavior, as well as documents

reflecting best practices in corporate governance. It applies to all structural units, branches, and subsidiaries of the Company.

All employees, including officials, are regularly briefed on the Code during onboarding and whenever it is updated.



The Company maintains an Ombudsperson, accountable to the Board of Directors, whose role includes ensuring compliance with the Code of Conduct and explaining its provisions. The Ombudsperson operates based on principles of independence, neutrality, impartiality, confidentiality, and informality.

To monitor the moral and psychological climate in the workplace and employees' awareness of the Code of Conduct, an anonymous survey was conducted during the reporting year.

The survey, which covered more than 2,100 employees across all branches (over 50% of total staff), showed the following:

- ◆ 98% of employees rated the moral and psychological climate and general atmosphere positively; they feel supported by management and mutual trust is present;
- ◆ immediate supervisors are perceived as objective and non-coercive;
- ◆ employees feel included in important work-related decisions and are not required to perform duties outside their job descriptions;
- ◆ employees know where to turn in the event of conflicts.

To address identified areas for improvement in labor relations and human rights compliance, the Ombudsperson developed and implemented an action plan in 2024, which included:

- ◆ Visiting 9 branches and their local divisions.
- ◆ Conducting meetings with the teams of Southern MES, Almaty MES, Akmola MES, Central MES, Aktobe MES, Eastern MES, Sarbai MES, Northern MES, Western MES, and branches of Energoinform JSC.

GRI 2-16, 2-25

Based on the conducted activities, employees were provided with explanations regarding the importance of adhering to ethical standards and rules of conduct at KEGOC JSC. The purpose and objectives of the Code of Conduct (Business Ethics) were clarified, communication channels were shared (contacts of the Ombudsperson, HR and Social Relations Department, the hotline operated by independent provider KPMG Tax and Advisory LLP, and the Nysana Call Center). Employees were also briefed on the resolution of labor disputes, including explanations of the “Basic rights and obligations of employees” and “Basic rights and obligations of the employer” under the Labor Code of the Republic of Kazakhstan, and the Company’s internal regulations and procedures for preventing potential conflicts of interest (KEGOC’s Conflict of Interest Management Policy).

These activities aimed to foster a corporate culture based on generally accepted moral and ethical norms as defined in the Code of Conduct, both among

employees and executives. During visits to the aforementioned branches, workplace conditions and employee rest areas were also inspected.

In 2024, the Company conducted onboarding courses for 43 newly hired employees in accordance with the “HR Administration Rules at KEGOC JSC”, including briefings on the Code of Conduct. The course included awareness training on the following internal standards:

- ◆ Whistleblowing Policy (Hotline);
- ◆ Anti-Fraud and Anti-Corruption Policy;
- ◆ Conflict of Interest Management Policy for Officers and Employees.

Also in 2024, the Ombudsperson:

- ◆ participated in a training session for corporate ombudspersons on “Due diligence in human rights compliance” organized by the Social Interaction and Communications Center of Samruk-Kazyna JSC;
- ◆ completed a course on “Training internal trainers on human rights and their protection” organized by the “Parasat” Mediation and Law Center;
- ◆ participated in a course on “Respecting workers’ rights in business” for ombudspersons from PC and subsidiaries of Samruk-Kazyna JSC.

The procedure for reviewing employee appeals is governed by the KEGOC JSC Ombudsperson Regulation, which entitles the Ombudsperson to request and

receive, in the prescribed manner, necessary information, materials, and explanations from employees, officers, the Head of Internal Audit, and Compliance Services. Upon accepting an appeal, the Ombudsperson must, within five (5) working days, explain the available means of protecting the complainant’s rights and/or correcting violations of the Code of Conduct. The Ombudsperson must also refer the matter to the relevant competent bodies of the Company.

GRI 2-26

In 2024, the KEGOC JSC Ombudsperson received 8 appeals, including 3 through the Nysana Call Center, two collective appeals, and others during branch visits.

Of the 8 appeals, 4 related to breaches of the Code of Conduct, 2 to human rights issues, and 2 were classified as other matters.

Each case was thoroughly investigated and the results were communicated to the complainants. The human rights allegations were not substantiated, and there were no lawsuits filed by employees for violations of labor legislation in 2024.

The Ombudsperson submits quarterly reports to the Board of Directors on all received appeals and corresponding actions.

## RESPECT FOR HUMAN RIGHTS

GRI 2-23, 2-24

THE KEGOC JSC PROTECTS AND RESPECTS HUMAN RIGHTS PROCLAIMED AT THE INTERNATIONAL LEVEL AND STIPULATED BY THE CONSTITUTION OF THE REPUBLIC OF KAZAKHSTAN AND CONTINUES THE PRACTICE OF CREATING EQUAL WORKING CONDITIONS FOR ALL EMPLOYEES, EXCLUDING ANY FORMS OF HARASSMENT OR DISCRIMINATION BASED ON GENDER, LANGUAGE, RACE, CITIZENSHIP, ATTITUDE TO RELIGION, GENDER IDENTITY, ETC. KEGOC JSC DOES NOT USE CHILD AND FORCED LABOR. COMPANY DOES NOT USE CHILD AND FORCED LABOR IN ITS ACTIVITIES.

In 2024, KEGOC JSC developed a Human Rights Policy to strengthen its corporate responsibility and align with international standards on human rights. The policy was officially approved by the Management Board on 31 March 2025.

The primary goal of KEGOC's Human Rights Policy is to ensure the observance of human rights and to adhere to internationally recognized standards, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, ILO principles, and others.

In line with this goal, KEGOC JSC commits to the following principles and to preventing any actions or practices that could violate them:

- ◆ No tolerance for any form of human trafficking, including recruitment, transportation, concealment, or receipt of persons for exploitation;
- ◆ No tolerance for forced labor, including under threat or coercion;

- ◆ No use of child labor—defined as labor by persons under the legally established minimum age for employment;
- ◆ Respect for employees' rights to freedom of association, including the right to form and join trade unions and to engage in collective bargaining;
- ◆ No discrimination based on gender, race, nationality, age, religion, social group membership, disability, residence, citizenship, or other non-business-related factors;
- ◆ Equal pay for work of equal value, without discrimination;
- ◆ Respect for other human rights, including the right to safe working conditions and the right to privacy and data protection.

The Human Rights Policy applies to all areas of KEGOC's operations, including its branches, subsidiary Energoinform JSC, and all contractors and suppliers.

The KEGOC JSC Management Board is responsible for the implementation of this Policy, the effective use of resources, and its integration into all business processes.

GRI 406-1

No cases of employee discrimination were recorded during the reporting year.



# ANTI-CORRUPTION

## KEGOC JSC ADHERES TO A POLICY OF ZERO TOLERANCE TOWARDS ALL FORMS OF CORRUPTION IN ITS INTERACTIONS WITH ALL STAKEHOLDERS, INCLUDING THE CONCEALMENT OF CORRUPTION-RELATED OFFENSES.

The Company prohibits all forms of bribery, including offering or receiving material benefits, privileges, or services of a property-related, physical, or moral nature in return for performing work or services or for taking (or refraining from taking) actions in favor of the provider of such benefits, where such actions fall within the authority of the Company's employees. Employees of the Company are not allowed to offer or accept hospitality or gifts that could result in obligations or influence. Officers and employees involved in corruption are subject to dismissal and legal liability in accordance with the legislation of the Republic of Kazakhstan.

The key risk factors for corruption identified by the Company include:

- ◆ misuse of official authority or related opportunities for personal material gain;
- ◆ abuse of power during procurement processes or in dealings with clients, suppliers, and contractors of KEGOC JSC;
- ◆ misuse of the Company's material resources for personal benefit or enrichment.

In its daily operations, KEGOC JSC strictly complies with anti-corruption laws and actively undertakes organizational and practical measures to counter all forms of corruption and manage corruption risk. Contracts with the Company's counterparties contain anti-corruption clauses, requiring the parties to implement compliance procedures aimed at mitigating the risk of involvement in corrupt activities. In 2024, no confirmed cases of corruption, disciplinary actions, contract terminations due to corruption, or legal proceedings related to corruption involving the Company or its employees were reported.

### GRI 205-3

There were no confirmed cases of corruption or incidents in which employees were dismissed or disciplined for corruption, contracts with business partners were terminated due to corruption-related violations, or court cases related to corruption against the Company or its employees during 2024.

### GRI 2-24

All Company employees (100%) have been familiarized with anti-corruption documents. Company officials sign commitments to comply with anti-corruption legislation. Efforts are underway to implement an accountability mechanism for executives regarding corruption offenses committed by their subordinates.

As part of its efforts to foster a culture of integrity and intolerance towards corruption, KEGOC JSC emphasizes preventive and educational initiatives. In 2024, the

Compliance Service conducted training sessions with employees of the Company, its subsidiaries, and branches on the topic: "Building integrity and an anti-corruption culture. Strengthening public oversight in corporate governance."

These sessions aimed to raise awareness of the Compliance function, promote the use of the "Hotline," explain the Anti-Fraud and anti-corruption rules of KEGOC JSC, and strengthen collaboration with regional branch and substation management.

Employees are regularly reminded to immediately report concerns related to:

- ◆ bribery and corruption;
- ◆ unequal hiring or labor conditions;
- ◆ accounting irregularities;
- ◆ threats to health, safety, or the environment;
- ◆ information leaks.

# FEEDBACK MECHANISMS

GRI 2-26

KEGOC JSC OPERATES A STAKEHOLDER HOTLINE ESTABLISHED BY SAMRUK-KAZYNA JSC FOR ITS PORTFOLIO COMPANIES. IT PROVIDES ALL INTERESTED PARTIES WITH AN OPPORTUNITY TO REPORT ACTUAL OR SUSPECTED VIOLATIONS OF LAWS, REGULATIONS, INTERNAL POLICIES, AND ETHICAL OR ANTI-CORRUPTION STANDARDS.

Reports can be made confidentially and anonymously, and the Company guarantees full confidentiality and review of 100% of reports. The Hotline is available 24 hours a day, 7 days a week.

In 2024, 25 reports were submitted via the Hotline to KEGOC JSC. All reports were thoroughly investigated:

- ◆ 15 — the facts were not confirmed;
- ◆ 3 — the facts were partially confirmed;
- ◆ 7 — explanatory work was conducted, and corrective measures were taken.

No confirmed cases involving signs of corruption were identified in 2024.

The Head of the Compliance Service submitted quarterly reports to the Board of Directors on all received reports and measures taken.

## Classification of violations identified in 2024

Category of Violations	Number of reports
Ethical violations, conflict of interest, and labor relations issues	13
Non-compliance with legal and internal requirements	5
Theft, fraud, and data misrepresentation	3
Violations with signs of corruption	2
Other	1
Occupational safety and environmental issues	1

GRI 415-1

KEGOC JSC does not engage, either directly or through its subsidiaries, affiliates, officers, or employees, in the financing of political campaigns or organizations, lobbying of trade associations, tax-exempt entities, or other groups that influence political campaigns, public policy, or legislation.



# RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

KEGOC JSC has successfully implemented and maintains a risk management system based on generally accepted conceptual risk management models developed by the Committee of Sponsoring Organizations of the Treadway Commission — COSO ERM “Enterprise Risk Management — Integrated Framework” and the requirements of Samruk-Kazyna JSC.

The corporate risk management system is a key component of corporate governance, aimed at timely identification, assessment, and control of risks that may adversely affect the achievement of KEGOC JSC’s strategic and operational goals.

The primary objective of the existing Corporate Risk Management System (CRMS) is to ensure continuity and stability of operations by limiting the impact of internal and external negative factors on KEGOC JSC’s activities.

**The core principles of the risk management system include:**

- ♦ engagement of the Company’s management in the risk management process;
- ♦ continuous improvement of the risk management system;

- ♦ ongoing training and knowledge-sharing in risk management among employees;
- ♦ transparency and honesty in risk reporting and escalation.

**The tasks of the risk management system are:**

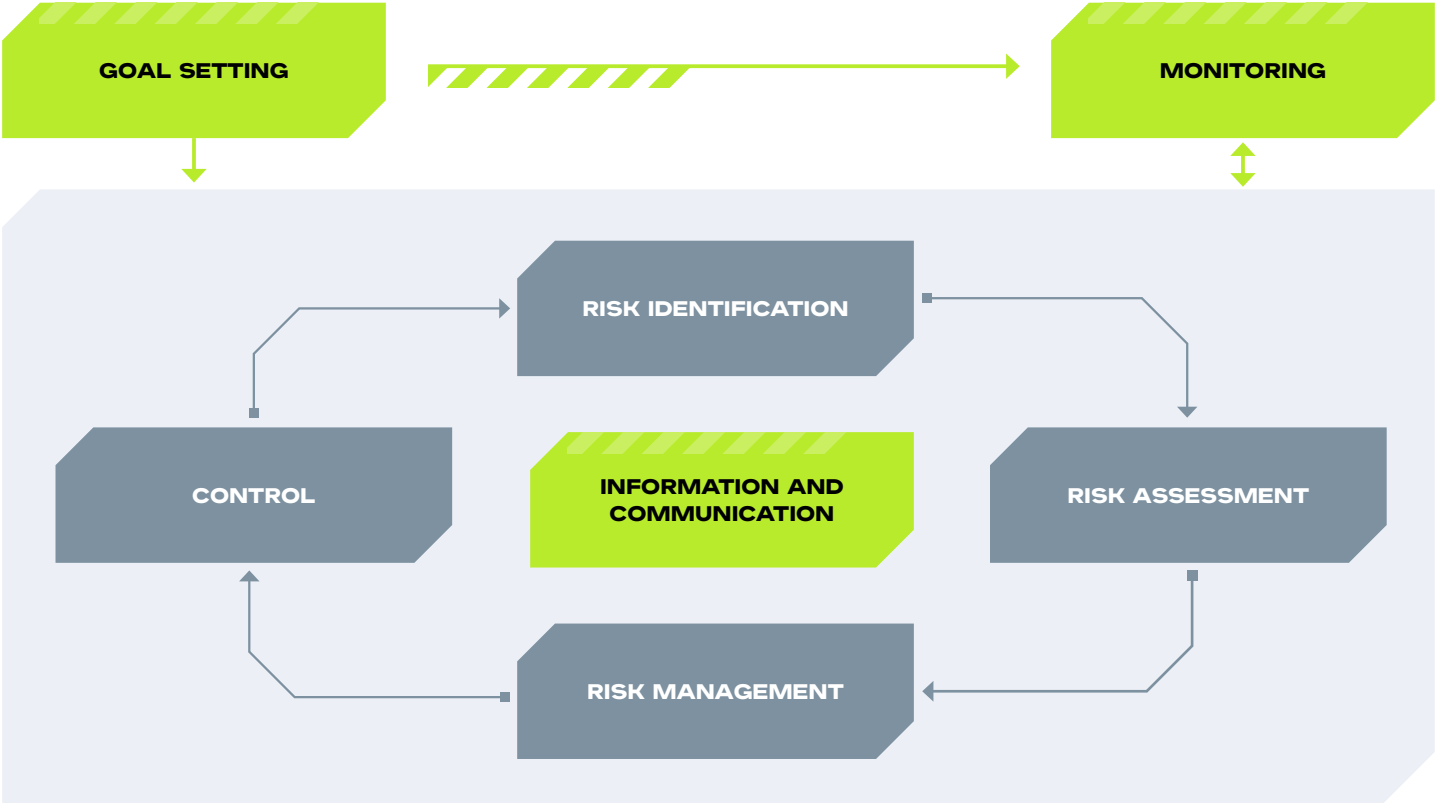
- ♦ development and application of uniform and consistent approaches to identifying, assessing, and managing KEGOC JSC’s risks, simplifying vertical (management) and horizontal (experience sharing) risk communication processes;
- ♦ prompt response to emerging risk events, tracking changes in external and internal environments;
- ♦ targeted risk management activities to reduce risks to an acceptable level or to transfer them to third parties (outsourcing, insurance, hedging) or avoid them altogether;
- ♦ systematization and accumulation of risk data at KEGOC JSC to enhance the Company’s manageability;
- ♦ improving KEGOC JSC’s competitiveness and achieving its strategic goals by enhancing the efficiency of the CRMS.

The CRMS serves as a tool to support managerial decision-making and day-to-day operational activities at KEGOC JSC.

The risk management process at KEGOC JSC is continuous, cyclical, and multidirectional, and includes the following components:

- ♦ internal environment;
- ♦ objective setting;
- ♦ risk identification;
- ♦ risk assessment;
- ♦ risk response;
- ♦ control activities;
- ♦ information and communication;
- ♦ monitoring.

**KEGOC JSC Risk Management Process**



Implementation of the above components of the risk management process contributes to the development of risk management culture (risk culture), which is the basis of risk management. It comprises beliefs, understanding and knowledge in the field of risk management, shared and applied by all officers and employees in the performance of their duties.

Risk culture is part of the corporate culture. The level of risk culture determines how risks are identified, assessed and managed from the development of the Development Plan through to its implementation and performance monitoring.

The risk culture is based on the following principles:

- ♦ **Tone at the top:** Decision-making is based on an optimal balance between long-term value, profitability and the risks associated with both making and not making decisions, and management encourages risk-oriented behavior in subordinates.
- ♦ **Corporate Governance:** KEGOC JSC activities are aimed at creating a control environment that ensures that employees understand that the Policy and all IRDs are binding. All officers and employees of KEGOC JSC clearly recognize their area of responsibility and authority for risk management and internal control. Risk Owners, within the scope of their competence, understand and manage risks and properly communicate risks in accordance with KEGOC JSC INEDs.
- ♦ **Decision-making:** The internal environment is characterized by open communication and transparency of risk information, which facilitates open and constructive discussion of associated risks and potential opportunities between employees and management, allowing for joint effective decision-making in response to external challenges.

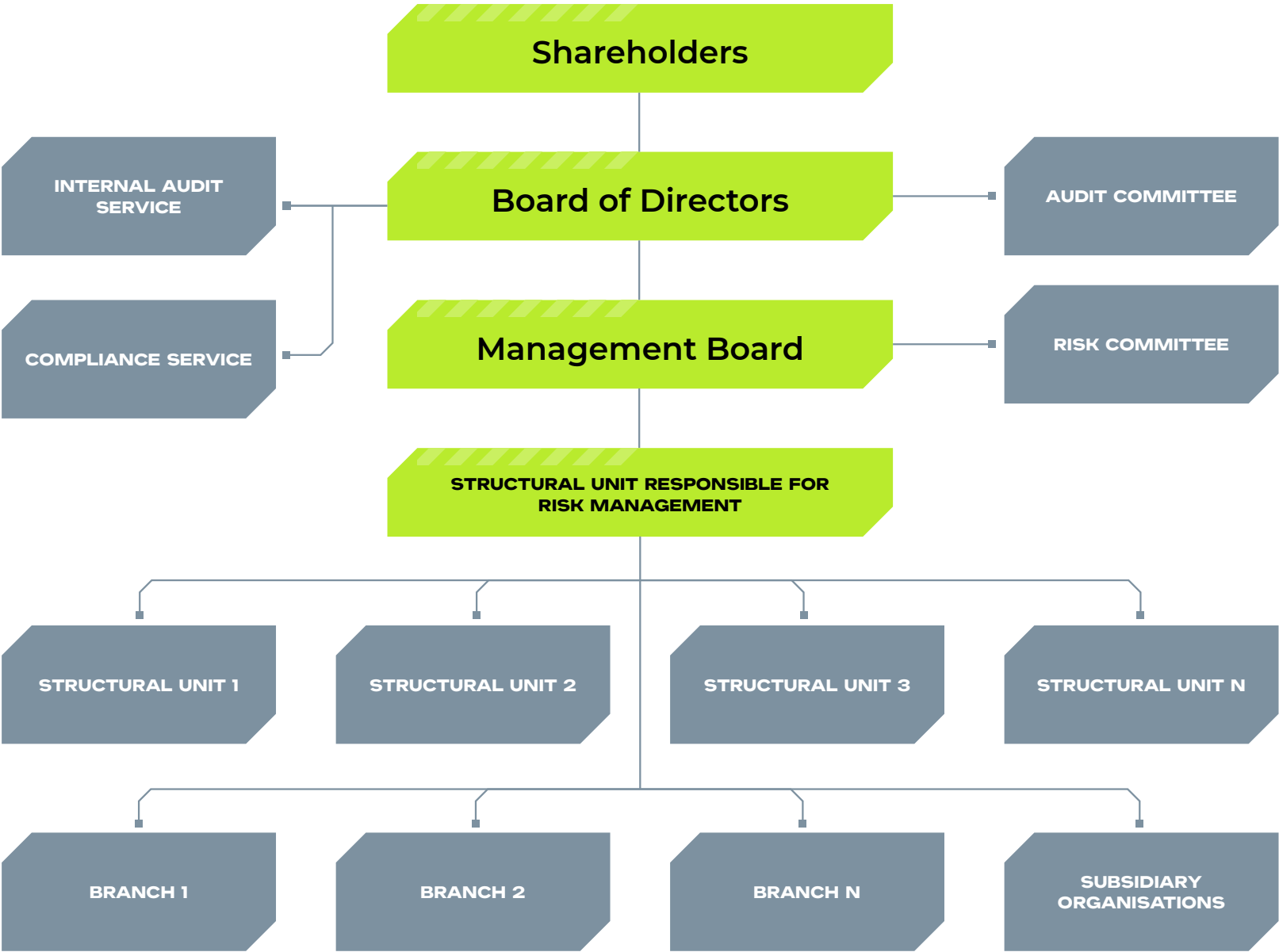
- ♦ **The remuneration system** at all levels uses financial and non-financial incentives for management and employees to form the right attitude to risk in the process of making managerial decisions. With a well-developed risk culture, decisions are clearly defined by the Risk Appetite.
- ♦ **Competence:** KEGOC JSC organizational structure is based on the 'three lines of defense' model. The Risk Unit effectively fulfils the role of the second line of defense, thereby increasing Management's confidence in achieving KEGOC JSC objectives.

One of the sources of information on the level of risk culture for the Management Board and the Board of Directors are documents on assessment of CRMS efficiency, reports on diagnostics of corporate governance in the Company.

In order to improve risk culture, the Company provides briefing/seminars for newly hired employees in the area of the Company's CRMS, and the Company's senior management takes part in specialised risk management seminars and trainings aimed at senior executives.

To control the level of risk culture development in the Company, in 2023, a questionnaire (survey) of employees/testing of knowledge in the field of CRMS was conducted to assess the effectiveness of risk management at the workplace. Based on the results of the survey, seminars for employees of structural divisions are planned for 2024. In addition, KEGOC JSC employees were tested on their knowledge of risk management and internal control systems, which was successfully passed by all tested employees.

Organizational structure of the CRMS





Functions and responsibilities of CRMS participants:

- ◆ The Board of Directors is responsible for the effective operation and development of the CRMS as a whole, setting the tone for risk management, and is responsible for implementing mechanisms to ensure that this tone is reflected throughout the Company and the subsidiary organizations and approves key CRMS documents;
- ◆ The Audit Committee acts in the interests of the shareholder(s) and its work is designed to assist the Board by making recommendations to monitor the robustness and effectiveness of the CRMS. Documents submitted for approval by the Board of Directors are preliminarily reviewed by the Audit Committee of the Board of Directors.

The IAS is responsible for regularly auditing the CRMS and providing an independent opinion to the Board of Directors/Audit Committee:

- ◆ audits and analyses the effectiveness of risk management procedures and methodology in the area of CRMS, and prepares proposals to improve the effectiveness of risk management procedures;
- ◆ submits the Report on CRMS efficiency to the Board of Directors;
- ◆ provides information to the structural unit responsible for risk management on realized risks identified during audits;
- ◆ fulfils other functions in accordance with the approved regulatory documents of KEGOC.

The Management Board is responsible for establishing, maintaining, and applying risk identification, assessment and management procedures, organizing the effective functioning of the CRMS, supporting

structural units in implementing/improving risk management processes in their activities, and ensuring that employees of the structural unit responsible for risk management have professional qualifications.

KEGOC JSC structural subdivisions, branches and subsidiaries are risk owners and are responsible for risk identification, analysis, risk assessment, risk management, preparation of proposals for mitigation of key risks, reporting on KEGOC JSC key risks and timely informing about the realized risks.

The Compliance Service is responsible for the development and implementation of a compliance programme aimed at managing the risks of violation of the Code of Conduct, anti-corruption legislation and other regulatory requirements applicable to KEGOC JSC.

The Risk Committee, whose task is to make decisions on KEGOC JSC risk management issues and prepare recommendations to KEGOC JSC Management Board on the Company's risk management issues. In 2024, the Committee held 8 meetings.

The structural subdivision responsible for risk management, for development of CRMS, clarification of internal and external requirements, provision of consulting assistance, develops IRDs on CRMS, monitoring of implementation of risk management measures and preparation of quarterly reporting on risks for the Risk Committee, Management Board and Board of Directors.

In performing their functions, the Board of Directors and the Management Board rely on the 'Three Lines of Defence' model, which interacts within the framework of the CRMS.

**The first line** of defence is represented by structural subdivisions represented by each employee within their competence.

**The second line** of defence is represented by structural subdivisions performing monitoring functions.

**The third line** of defence is represented by the Internal Audit Service, which independently assesses the effectiveness of and contributes to the improvement of risk management and internal control, supports the Audit Committee and the Board of Directors by providing them with an independent assessment of the effectiveness of CRMS and internal control.

On a regular basis, KEGOC JSC analyses existing risks and identifies new risks that may adversely affect the achievement of goals, objectives, indicators, and fulfilment of the KEGOC JSC Development Plan (Strategy), Action Plan (Business Plan) of KEGOC JSC.

The following methods are used for risk identification:

- ◆ analysing business processes;
- ◆ collection and analysis of statistical data;
- ◆ individual expert methods (questionnaires, interviews);
- ◆ group methods (brainstorming, business game);
- ◆ monitoring of publications and speeches.

Risks may also be identified when considering issues submitted to the meetings of the Management Board, Board of Directors, changes in the external environment, changes in KEGOC JSC processes, procedures, organisational structure, etc.

Risks are identified on the basis of existing goals (KPIs) of the Management Board members, management employees, heads of structural divisions of the current year, which are formed on the basis of strategic goals of KEGOC JSC.

In the process of risk inventory, a risk assessment is carried out in parallel with the determination of approaches to risk management.

Within the framework of risk assessment the following risk parameters are assessed:

- ◆ the impact (size) of the risk;
- ◆ probability of realisation (frequency) of risk;
- ◆ impact time.

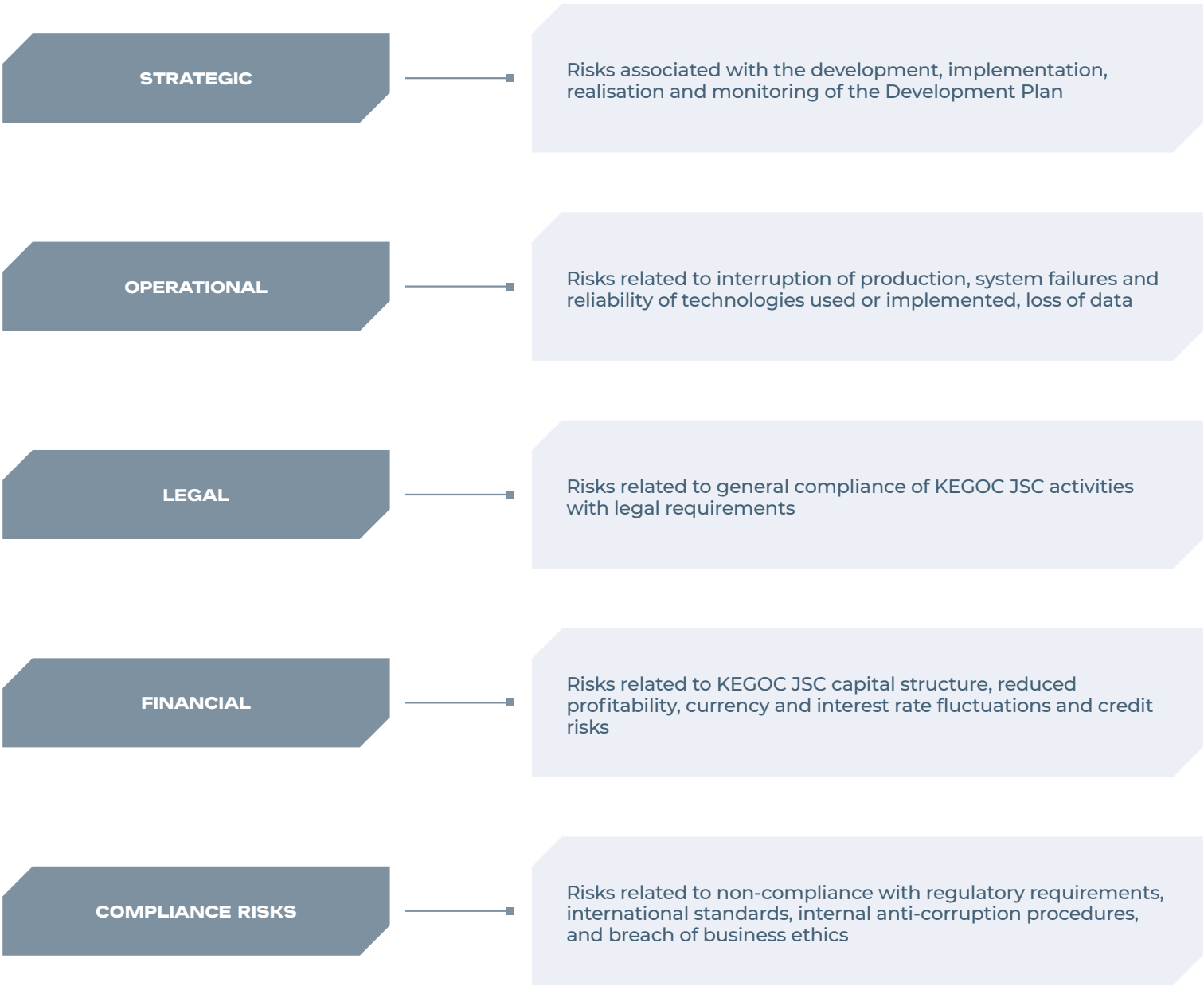
When assessing risks, qualitative or quantitative analyses or a combination of both are used.

Assessment of risk realisation probability, impact, impact time is carried out in accordance with the risk assessment criteria established in KEGOC JSC. The results of the risk assessment process are plotted on the Risk Map, which visually reflects the relative importance of each risk. Risks are ranked into low, medium, large and critical risks.

Preventive and reactive measures are developed for all identified risks and approved by the Board of Directors. Key risk management measures are aimed at preventing risks and/or minimising the consequences in the event that risks materialise.

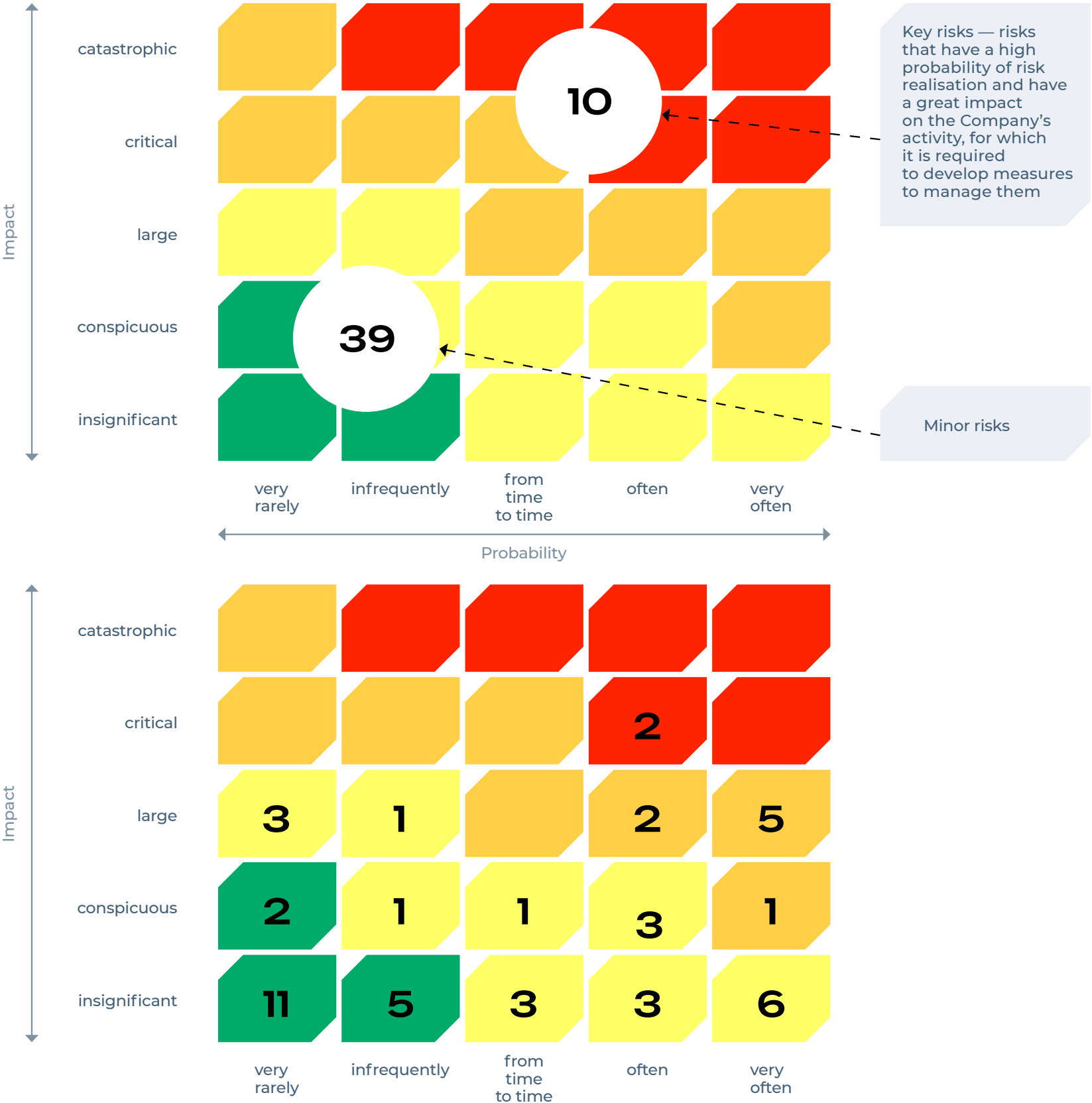
All identified risks with their assessment and measures are approved by the Board of Directors.

Classification of KEGOC JSC risks



The results of risk identification and assessment are summarized in the Company’s Risk Register for 2024, which includes 49 risks. Measures for their management have been developed for each risk, and risk owners have been identified. The Company continuously monitors the dynamics of key risks and the implementation of mitigation measures by sending quarterly risk reports to the Management Board and the Board of Directors of the Company.

Risk map of KEGOC JSC







The most significant and relevant risks for KEGOC JSC in the reporting year include:

- ♦ risk of a work-related accident;
- ♦ production asset failure;
- ♦ decline in the Company's share price below the SPO placement price;
- ♦ risk of increased overdue accounts receivable for system services rendered.

More detailed information on the management of key risks is disclosed in the relevant sections of this report by business areas and implementation of the Company's strategic goals.

In addition to the main risks, the Company has considered emerging risks that are at the identification stage and/or may significantly increase in the future and are capable of having a material impact on the

Company's operations and potentially have a long-term (3–5 years) material impact on its activities. Currently, the following are considered emerging risks: climate change; cyber risks; global pandemics affecting international trade or global supply disruptions; as well as geopolitical risks.

Emerging risk 1		Emerging risk 2
Supporting Evidence	According to the Climate Program of KEGOC JSC, an analysis of climate risks was conducted using climate scenarios and models, which confirmed the high vulnerability of the Company's infrastructure to extreme weather events.	IT is becoming a key factor in achieving the Company's goals and implementing its strategy. With the development of technology and the widespread use of the Internet, new cybersecurity risks are emerging. The number and complexity of attacks targeting all types of digital devices are increasing, and incidents involving attacks on the IT infrastructure of large corporations and critical industrial facilities have become more frequent.
Name of Emerging Risk	Climate risk (transition and physical)	Information security risks
Category	Operational risk	Operational risk
Description	Climate change may lead to rising temperatures, increased frequency of droughts and floods, hurricanes, which affect the reliability of MES facilities, reduce the efficiency of energy transmission, and increase costs for network repair and modernization.	Risk associated with disruption of digital systems, leakage of confidential information, hacking of SCADA systems and IT infrastructure. Given the scale and significance of KEGOC JSC in managing the UPS, attacks on information resources may lead to disruptions in dispatch control and electricity transmission.
Impact	Potential power transmission disruptions, infrastructure damage, increased recovery costs, reduced operational efficiency and energy supply reliability, especially under conditions of increasing share of RES.	Loss of confidential information, disruption of operations, possible outages or power supply interruptions, reputational damage, regulatory fines, decreased trust from investors and consumers.
Mitigating Actions	1. Implementation of a climate monitoring system and vulnerability analysis of facilities. 2. Development of Smart Grid and digital technologies. 3. Modernization of 220–500 kV transmission lines. 4. Investment in resilient infrastructure and green bonds to finance adaptation project	1. Implementation of cybersecurity and threat monitoring systems. 2. Updating internal regulations on information security. 3. Staff training on methods for countering cyber threats. 4. Conducting system stress testing. 5. Cooperation with national cybersecurity centers.

In 2024, a climate risk was identified and included in the Risk Register for 2025, which may arise due to climate change extreme temperature increases, floods, strong wind loads (physical risks), and the implementation of measures to mitigate its consequences political and regulatory measures related to climate change, non-compliance with technological innovations supporting the transition to a low-carbon economy, stricter requirements from stock exchanges and financial institutions regarding disclosure of non-financial information on climate (transition risks).The internal control system of KEGOC JSC (ICS) is based on the COSO model and includes five interrelated components: control environment, risk assessment, control activities, information and communication, and monitoring.

The internal control system policy of KEGOC JSC defines internal control as a process carried out by the participants of the internal control system in order to achieve the set objectives in three key areas:

- ◆ operational activities;
- ◆ financial reporting preparation;
- ◆ compliance with regulatory and legal requirements.

The ICS provides for the creation of a management system capable of promptly responding to process risks, controlling main and auxiliary business processes and daily operations, as well as promptly informing the relevant management level of any significant deficiencies and areas for improvement.

According to the Regulation on the organization and execution of work on the internal control system of KEGOC JSC, the competence of the ICS participants is delineated depending on their role in the processes of development, approval, implementation, and assessment of ICS effectiveness.

The Board of Directors and the Management Board of the Company rely on the “Three Lines of Defense” model in carrying out their functions. ICS participants include the Board of Directors, the Management Board, the Audit Committee, the Internal Audit Service, structural units — owners of business processes and subprocesses, control procedure performers, and the unit responsible for risk management and internal control.

The Company regularly conducts an assessment of the design of control procedures, which includes the analysis of existing business processes.

This work includes the identification and assessment of process risks, analysis of internal regulations and flowcharts, as well as assessment of the effectiveness of control procedures. Based on the design assessment, the risk and control matrix is approved by the business process owner, and recommendations are provided for business process improvement.

The Internal Audit Service is responsible for directly assessing the effectiveness of the ICS, testing the operational effectiveness of control procedures, and preparing and presenting the respective report to the Audit Committee and the Board of Directors.

Annually, based on the Company’s business process register, a control procedure design assessment plan is approved. Under this plan, the effectiveness of control procedure design is analyzed. Based on the analysis results, recommendations are developed for improvements and areas for development.

The Company has implemented a business continuity management system, which identifies business processes/subprocesses requiring the development of BCPs (Business Continuity Plans). In 2024, work was conducted to identify the Company’s critical business processes/subprocesses for which BCPs were developed and tested, particularly for providing system operator services for technical dispatching, ensuring occupational safety and equipment reliability, providing and supporting ITC services, managing information security incidents, and ensuring KEGOC JSC’s operations in the event of emergencies.

The Internal Audit Service of KEGOC JSC annually evaluates the effectiveness of the CRMS and ICS, and the results are submitted to the Company’s Board of Directors. Based on the 2024 evaluation conducted by the Internal Audit Service, the internal control and risk management systems are functioning in an acceptable manner, providing reasonable assurance of achieving the Company’s goals. For all identified non-conformities, corrective action plans were developed based on IAS recommendations, and their implementation is monitored on an ongoing basis.



# INTERNAL AUDIT SERVICE

**THE MISSION OF THE INTERNAL AUDIT SERVICE IS TO PROVIDE THE NECESSARY SUPPORT TO THE BOARD OF DIRECTORS AND THE EXECUTIVE BODY IN FULFILLING THEIR RESPONSIBILITIES FOR ACHIEVING THE STRATEGIC GOALS OF THE COMPANY. THE PRIMARY OBJECTIVE OF THE SERVICE’S ACTIVITIES IS TO PROVIDE THE BOARD OF DIRECTORS WITH INDEPENDENT AND OBJECTIVE INFORMATION TO SUPPORT EFFECTIVE COMPANY MANAGEMENT THROUGH A SYSTEMATIC APPROACH TO IMPROVING RISK MANAGEMENT, INTERNAL CONTROL, AND CORPORATE GOVERNANCE SYSTEMS.**

During 2024, the Service’s activities were regulated by the following documents:

- ◆ International professional standards for internal auditing;
- ◆ Code of ethics of the institute of internal auditors;
- ◆ Regulations on the Internal audit service of KEGOC JSC, approved by the Board of Directors of KEGOC JSC;
- ◆ Rules for organizing internal audit at KEGOC JSC, approved by the Board of Directors of KEGOC JSC;
- ◆ Job descriptions of the Service's employees, approved by the Chairman of the Board of Directors of KEGOC JSC.

All audit assignments were planned in accordance with the Service’s mission and primary objective. A risk-based approach was applied in audit planning, giving priority to business processes most susceptible to adverse events.

The 2024 Annual Audit Plan of the Internal Audit Service was approved by the Board of Directors of KEGOC JSC on 24 November 2023 (Minutes No. 12). The plan included 17 audit assignments.

The audit assignments completed under the 2024 Annual Audit Plan covered: comprehensive audits of six branches of the Company, audit of procurement processes, audit of actual KPI values for senior and management-level employees of KEGOC JSC for 2023 and long-term KPIs, IT audit, HR audit, audit of the organization and effectiveness of the compliance function at KEGOC JSC, audit of KEGOC JSC’s interaction with the trade union, audit of the balancing electricity market system, audit of the formulation and monitoring of the Investment Program execution. As part of a Synergistic Audit or at the request of the Internal Audit Service of the Fund, based on the letter from the Head of the Internal Audit Service of Samruk-Kazyna JSC, an audit was carried out

on “Occupational Health and Safety Management Process.” All assignments were completed. No material non-conformities were identified that could affect the Company’s operations.

Based on the audit results, the Service provided appropriate recommendations for eliminating identified non-conformities. Audit objects developed Corrective Action Plans in collaboration with the Service. The Service conducts quarterly monitoring of the implementation of issued recommendations.

# INFORMATION POLICY AND SECURITY

IN 2024, KEGOC JSC SUCCESSFULLY CONTINUED IMPLEMENTING ITS INFORMATION POLICY, BASED ON THE PRINCIPLES OF EQUAL, COMPREHENSIVE, ACCURATE, AND TIMELY DISCLOSURE OF INFORMATION FOR STAKEHOLDERS. THIS POLICY ONCE AGAIN PROVED EFFECTIVE IN SUPPORTING THE COMPANY'S INVESTMENT ATTRACTIVENESS, STRENGTHENING TRUST FROM THE INVESTMENT COMMUNITY, AND ACHIEVING STRATEGIC DEVELOPMENT GOALS.

KEGOC JSC actively interacted with the expert community, shareholders, and investors through timely disclosure of material information about the Company's activities.

**The following channels were used:**

- ◆ publications in leading media outlets;
- ◆ corporate website;
- ◆ official social media pages (Facebook, Instagram, Telegram, Twitter);
- ◆ speaker appearances on television;
- ◆ comments and responses to journalists' inquiries.

The key informational events of 2024 were major achievements of KEGOC JSC. High profitability enabled the Company to successfully fulfill its obligations to shareholders. One of the most significant events was the launch of a project to connect the Western

Kazakhstan power grid to the UPS of the country. To finance this project, loan agreements were signed with the European Bank for Reconstruction and Development and the Development Bank of Kazakhstan.

The Company's successful performance led to an upgrade in several credit ratings to investment grade by Moody's and S&P. Additionally, KEGOC JSC maintained high standing in the corporate sector, becoming a leader among Samruk-Kazyna portfolio companies in occupational safety compliance and achieving a 87% social stability level among production staff.

KEGOC JSC strictly complies with legal requirements for the protection of commercial, official, and other confidential information. Information security principles are integrated into all processes of disclosure and dissemination of corporate information.

Special attention was paid to procurement transparency within the Samruk-Kazyna Fund, which helped strengthen trust among international partners and investors.

KEGOC JSC's Information policy in 2024 once again demonstrated its effectiveness in supporting the Company's investment appeal, strengthening partnerships, and achieving strategic development goals. Further improvement of this policy remains a key priority for ensuring sustainable growth and successful implementation of the Company's investment programs.



## INFORMATION SECURITY

The main goal of information security (IS) activities is to ensure and enhance the protection of KEGOC JSC's information assets, as well as to coordinate, plan, and organize IS activities, including effective strategic IS management and the improvement of IS process maturity levels.

The Information Security Management System (ISMS) has been developed and implemented based on ISO/IEC 27001 and is an integral part of the Company's integrated management system.

The scope of the ISMS at KEGOC JSC covers the information system managing the financial and economic processes of KEGOC JSC, supporting the implementation of core and auxiliary business processes.

To ensure compliance with requirements and define the Company's context, an Information Security Policy has been approved.

In accordance with KEGOC JSC's internal IS regulations, work has been carried out to analyze new criteria for information assets that are valuable to KEGOC JSC. In 2024, KEGOC JSC continued to strengthen measures to ensure the security of information assets.

### KEY RESULTS

As a result of the 2024 external audit, KEGOC JSC received an ISO 27001 certification of compliance, confirming that the Company meets high standards in information security management. This is a significant step toward ensuring the security of the Company's information systems and data.

By the end of 2024, all IS systems are operating properly. Ongoing monitoring is carried out to ensure the operability of the Company's cyber protection systems. IS policies (DLP, PAM) are being updated. The corporate network is subject to weekly antivirus checks. The Company's antivirus software successfully detects and neutralizes malware (ransomware). Confidential data analysis (DLP) is performed, spam and phishing emails are blocked (anti-spam).

Two-factor authentication has been implemented for remote VPN access, significantly reducing the risk of workstation breaches.

Together with QazCloud LLP, KEGOC JSC conducted activities to expand the SOC monitoring zone. As of now, the Company's corporate network is fully connected to the SOC (fully integrated into Samruk-Kazyna JSC's Cyber Shield). An audit of authorized software in the Company was conducted within the framework of the approved Software Register used at KEGOC JSC.

In 2024, the Company's protection system (Kaspersky) detected and successfully removed malware related to worms and unauthorized software. Due to the successful implementation of virus detection and removal measures, no internal investigations were required. Phishing emails related to cryptocurrencies were blocked.



## AWARENESS RAISING

In accordance with the requirements of the ISMS, a unified corporate ethics policy on information security (IS) has been approved in the Company, supporting employee awareness.

KEGOC JSC ensures appropriate competence (education, training, experience) of personnel responsible for IS by conducting technical training, specialized advanced training courses, briefings, and implementing a system of professional training and staff development.

In 2024, training sessions were conducted for Company employees to raise awareness about cyber hygiene and compliance with the Company's Information Security Policy. Employees were tested to assess their level of awareness.

Additionally, for self-education purposes, a dedicated "Information Security" section exists on the Company's portal, which contains information on current threats, IS digests, and spam mailings.

Upon hiring a new employee, an introductory IS briefing is conducted, and a briefing checklist is completed in accordance with the Personnel Management Standard. In 2024, 54 employees underwent this briefing.

KEGOC JSC has developed processes for user training on protection procedures and the proper handling of information resources. Processes have been established for providing and receiving necessary information on KEGOC JSC rules and procedures, including security requirements and other control measures. These processes also apply to users from external organizations who have permanent or temporary access to KEGOC JSC's information resources.

To enhance employee awareness, methodological materials on IS assurance were prepared. These materials are posted monthly on the KEGOC JSC unified portal in the "Information Security" section.

INCIDENT MANAGEMENT

The Company has approved Information Security Incident Management Rules, which define the basic measures, methods, and tools for maintaining the operability of the Company's IS in the event of various IS incidents, as well as methods and tools for restoring information and processing processes in case of IS or component malfunctions. The main objectives of the IS incident management process are to minimize damage, promptly restore the original state of the IS, and develop a plan to prevent similar incidents in the future.

Company employees and IS users must immediately report through administrative channels any events that potentially pose a security threat. The list and nature

of such events must be communicated to users during briefings on information security responsibilities and training on the use of information systems and services.

Users of KEGOC JSC's information resources are required to log any observed or suspected vulnerabilities in the security system and report them. Users must promptly inform authorized personnel of such incidents. Under no circumstances should they attempt to test the suspected vulnerabilities themselves.

Users of KEGOC JSC's information resources are also required to log all cases where software behavior appears incorrect, i.e., does not match specifications. If there

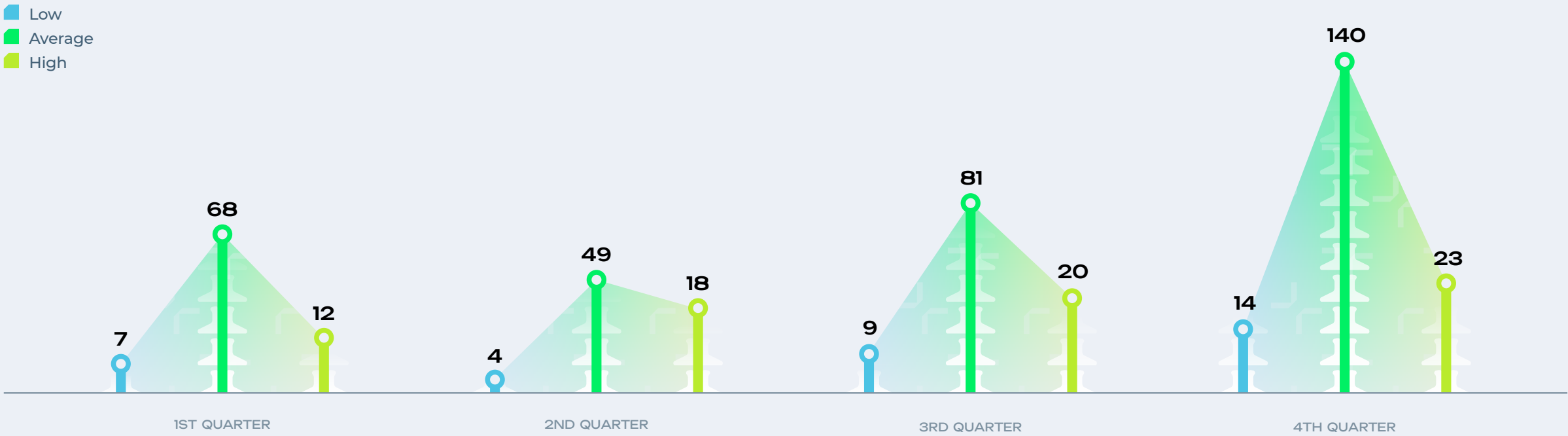
is suspicion that a failure was caused by malicious software (e.g., a computer virus), users must report this to authorized personnel.

Users must not attempt to independently restore software functionality by removing suspected malicious programs.

By the end of 2024, 445 information security incidents were identified, and corresponding measures were taken to minimize IS risks.

The highest number of IS incidents was recorded in the "Malware" category, identified on users' workstations.

Distribution of information security events by quarter in 2024





## EMERGENCY PREPAREDNESS

The Company has established business continuity procedures aimed at limiting the impact of internal and external negative factors on the activities of KEGOC JSC.

In accordance with the Business Continuity Plan for the information infrastructure and information assets, KEGOC JSC conducted testing of the BCP in the event of detected information security incidents. This plan is tested annually.

As a result of activities in 2024, no information security incidents occurred that would cause financial or reputational loss to the Company's information assets.

### EXTERNAL AND INTERNAL AUDIT

At KEGOC JSC, external and internal audits of the ISMS are conducted in accordance with the Audit Plan. The audit covers all system processes, establishing links between process goals, implementation, and outcomes, identifying weaknesses and areas for improvement.

The Company undergoes annual re-certification for compliance with the ISO 27001 standard.

To comply with legal requirements, the Company conducts annual external penetration testing. The testing uses various methods and techniques selected based on the specifics of the Company and its information systems.

## RISK MANAGEMENT AND MEASURES TAKEN

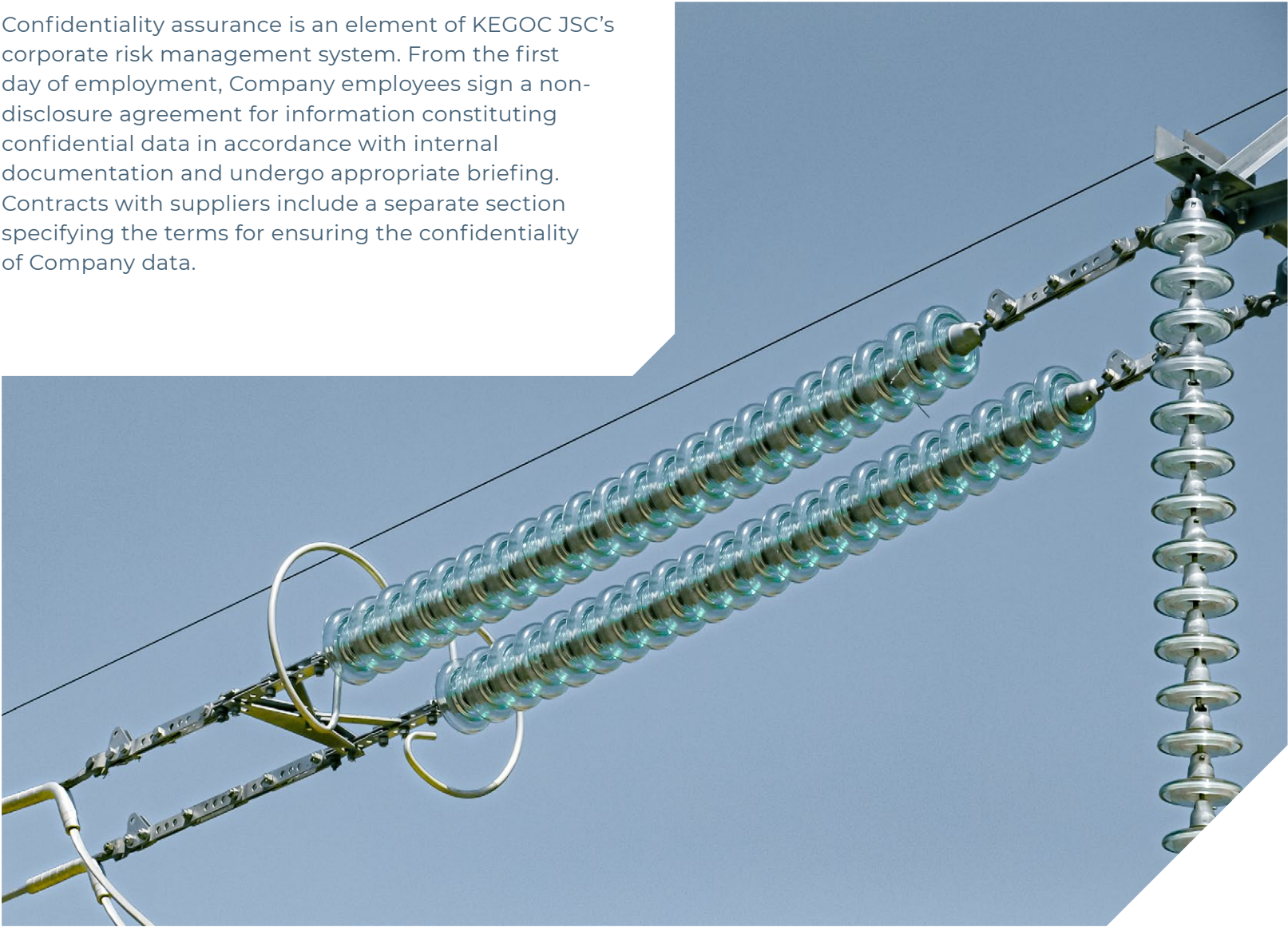
Information security risk management is an element of KEGOC JSC's corporate risk management system. Risk assessment in the field of information security is carried out for all assets of KEGOC JSC, based on which a risk assessment report and an Information Security Risk Treatment Plan are developed.

To manage the identified risks, a Control measures plan for implementing ISMS security measures at KEGOC JSC, a Thematic information security training plan for employees, as well as a Priority information security measures plan and activities aimed at increasing the level of information security of production systems have been developed.

KEGOC JSC strives to continuously improve information system security measures and ensure the reliability of the entire Company's operations. The Company will continue to improve its processes and security measures in accordance with best practices and new technologies.

**TO CONFIRM THE COMPLIANCE OF KEGOC JSC ISMS, A CERTIFICATION AUDIT WAS CONDUCTED IN 2023 BY THE INDEPENDENT CERTIFICATION BODY "MS CERTIFICATION SERVICES PRIVATE LIMITED" (INDIA), AND A SURVEILLANCE AUDIT WAS CONDUCTED IN 2024, BOTH OF WHICH CONFIRMED THAT THE ISMS MEETS INTERNATIONAL STANDARDS REQUIREMENTS.**

Confidentiality assurance is an element of KEGOC JSC's corporate risk management system. From the first day of employment, Company employees sign a non-disclosure agreement for information constituting confidential data in accordance with internal documentation and undergo appropriate briefing. Contracts with suppliers include a separate section specifying the terms for ensuring the confidentiality of Company data.







# FINANCIAL STABILITY

131	Tariff policy
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# TARIFF POLICY

The activities of KEGOC JSC are regulated by the Law of the Republic of Kazakhstan “On Natural Monopolies”, according to which the following services provided by the Company belong to the sphere of natural monopoly:

- ♦ electricity transmission through the NPG;
- ♦ NPG usage service;
- ♦ technical dispatching of electricity supply and consumption in the grid;
- ♦ organization of balancing of electricity production and consumption.

Since its establishment, KEGOC JSC has consistently worked to improve the tariff policy of regulated services and has been actively involved in the work of relevant organizations to improve tariff policy.

In accordance with the legislation of the Republic of Kazakhstan, KEGOC JSC is working on submitting applications to the Committee for Regulation of Natural Monopolies of the Ministry of National Economy of the Republic of Kazakhstan (hereinafter referred to as CRNM) for approval (revision) of tariffs for regulated services related to the field of natural monopoly.

The Company’s tariffs are set using the “costs plus fixed profit” method, according to which the Company, for the purpose of tariff formation for a certain period of time, proceeds from appropriate estimates of operating and financial expenses and a fair rate of return on equity.

In 2013, KEGOC JSC started approving tariff limits. The principles of calculating tariff limits are similar to calculating annual tariffs, except that tariff limits are approved for a period of several consecutive years. Tariff limits allow the Company to plan its capabilities for long periods, and shareholders have the opportunity to obtain more complete information about the Company.

In order to reflect these changes, by Decision of the CRNM (Order No. 92-OD dated July 3, 2023), amendments to the tariffs and tariff estimates for the regulated services of KEGOC JSC were approved, effective from July 1, 2023. Further adjustments

to the tariff levels for the period from March 1, 2024 to September 30, 2024 were introduced by Order No. 25-OD of the CRNM dated February 9, 2024.

Based on the application of KEGOC JSC, CRNM, by Order No. 82-OD dated 09/11/2024, approved the adjustment of tariff estimates for regulated services of KEGOC JSC for the 3rd regulated period (from October 1, 2023 to September 30, 2024).

In 2024, the specialized interdistrict Administrative Court of Astana city, by a resolution dated November 7, 2024, canceled the order of CRNM on approval of temporary compensating tariffs for regulated

services of KEGOC JSC No. 67-OD dated April 22, 2022.

In accordance with the requirements of regulatory legal acts, it is planned to hold annual reporting hearings on the provision of regulated services, the purpose of which is to strengthen the consumer protection system and ensure transparency of activities to consumers and other interested parties.

## SASB IF-EU-240A.1

### Tariff change for regulated services of KEGOC JSC

Tenge/ kWh	01.10.2023-29.02.2024	01.03.2024-30.09.2024	01.10.2024-30.09.2025	01.10.2025-30.09.2026
Electric power transmission service via NPG	3.381	3.474	3.492	3.564
NPG usage service	1.943	1.996	2.002	2.056
Service for technical dispatching of supply to the grid and consumption of electric energy	0.339	0.339	0.351	0.356
Electric energy production and consumption balancing service	0.060	0.060	0.064	0.066

# ANALYSIS OF FINANCIAL AND ECONOMIC INDICATORS

GRI 2-6

Analysis of actual income and expenses in 2024, million tenge

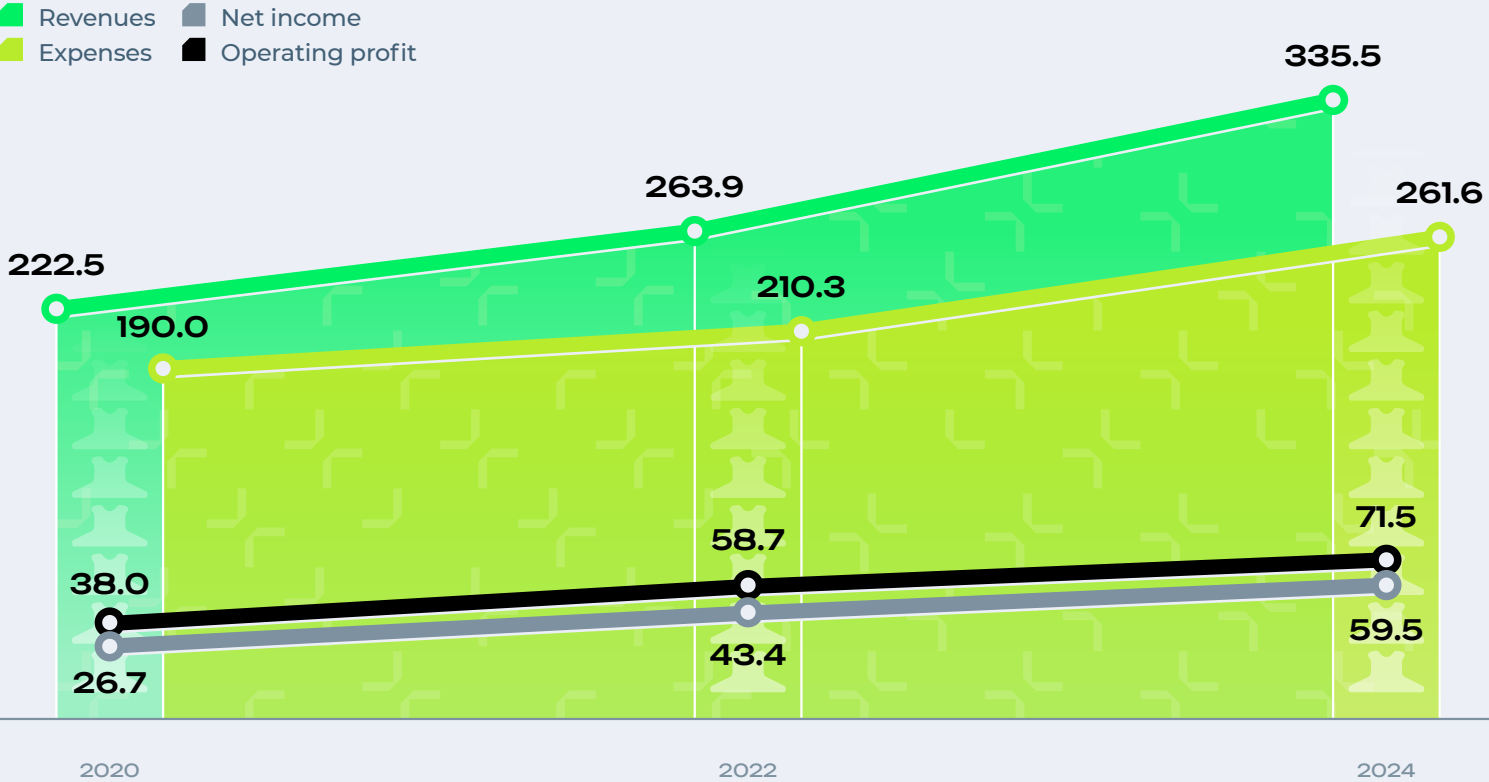
	2024 Plan	2024 Actual	Deviation	The main causes of deviations
Consolidated income	312,043.1	338,447	108%	
Income from core business	304,358.7	319,905.9	105%	<div><div>1. The growth of revenues from regulated services by 7,706.2 million tenge, including:<ul style="list-style-type: none"><li>◆ for services related to the use of NPG for 4,721.8 million tenge;</li><li>◆ for the transmission of electricity for 1,713.8 million tenge;</li><li>◆ by dispatching for 1,131.3 million tenge;</li><li>◆ in terms of income from services for balancing the production and consumption of electric energy by 139.4 million tenge.</li></ul></div><div>2. Increased revenue from BDT operations and imbalances mainly as a result of increased volumes:<ul style="list-style-type: none"><li>◆ for the sale of balancing electric energy in the balancing market for 10 180.1 million tenge;</li><li>◆ for the sale of electricity in order to compensate for imbalances by 641.4 million tenge.</li></ul>At the same time, we note that the turnover of the BDT and the imbalances balance with the expenditure turnover.</div><div>3. The growth of income from financial transactions on VDS in the amount of 5,406.6 million tenge.</div></div>
Consolidated expenses	254,773.2	264,582.5	104%	
Cost price	217,533.5	228,253.9	105%	<div><div>1. An increase in the cost of technological consumption of electricity by 8,968.8 million tenge as a result of an increase in actual volumes by 102.5 million kWh (by 1,643.9 million tenge) and an increase in the average price to 18.43 tenge/kWh (plan 16.03 tenge/kWh) by 7,324.8 million tenge;</div><div>2. 2. An increase in the cost of purchasing electricity in order to compensate for hourly deviations in the actual interstate balance of electricity flows by 10,001.2 million tenge;</div><div>3. 3. Reduction of the cost of capacity regulation provided by third-party organizations by KZT 3,670.1 million.</div></div>
General and administrative expenses	14,173.8	11,219.5	79%	The decrease occurred as a result of the restoration of the accounts receivable reserve ( Rosseti PJSC) and the resulting savings on current costs.
Implementation expenses	623	548.6	88%	Reduction as a result of the current savings on current expenses
Operating profit	72,028.3	79,883.9	111%	



Analysis of the actual indicators of income and expenses in 2024 with the actual indicators in 2023, million tenge

	2023 Actual	2024 Actual	Deviation	The main causes of deviations
Consolidated income	266,496.2	338,447	127%	
Income from core business	252,136.3	319,905.9	127%	The increase was mainly due to an increase in revenues from regulated services by 44,010.9 million tenge as a result of changes in tariffs and volumes of services provided and the commissioning of services for the use of the NPG from July 1, 2023. At the same time, compared to the same period last year, revenues from the sale of electric energy in the framework of the balancing market of the Republic of Kazakhstan increased by 23,121.2 million tenge.
Consolidated expenses	212,897.5	264,582.5	124%	
Cost price	181,403.6	228,253.9	126%	Compared to the same period in 2023, cost expenses increased by 46,850.3 million tenge, which was mainly due to an increase in the cost of purchasing balancing electric energy by 9,282.0 million tenge, technological electricity consumption by 23,595.7 million tenge, maintenance of capacity reserves by 1,708.3 million tenge, expenses for purchase of electricity in order to compensate for imbalances by 4,742.3 million tenge, as well as the wage fund by 4,295.6 million tenge as a result of systematic measures to improve the level of social stability.
General and administrative expenses	13,680.3	11,219.5	82%	The decrease resulted from the restoration of the accounts receivable reserve
Implementation expenses	490.9	548.6	112%	The increase is due to an increase in the wage fund
Operating profit	56,561	79,883.9	141%	

Dynamics of financial and economic indicators, billion tenge



COEFFICIENT ANALYSIS

By the end of 2024, the ROACE indicator increased by 1,269 percentage points compared to the level of 2023, including: an increase of 1,711 percentage points due to an increase in adjusted profit (NOPAT) by 15.24 billion tenge, a decrease of 0.443 percentage points due to an increase in average employed capital (ACE) by 60.79 billion tenge.

At the end of 2024, compared to 2023, there was an increase in EBITDA by 23.366 billion tenge, the change in the indicator was influenced by:

- ◆ changes in volumes and tariffs for regulated services by 44.011 billion tenge;
- ◆ reduction of the loss from the purchase and sale of electricity in order to compensate for hourly deviations in the actual interstate balance of the flow of electric energy by 9.069 billion tenge as a result of the introduction of a new mechanism for the operation of the electric power market;

- ◆ an increase in the cost of technological electricity consumption (losses) in the amount of 23.596 billion tenge as a result of an increase in the average purchase price of electricity;
- ◆ an increase in labor costs, including deductions of 5,606 billion tenge and other factors.

During 2024, the standards for financial stability indicators and covenants have not been violated.

23.366  
billion tenge

Increase in EBITDA in 2024  
compared to 2023



## ECONOMIC VALUE GENERATED AND DISTRIBUTED VALUE

THE ECONOMIC COMPONENT OF KEGOC JSC ACTIVITIES IS OF STRATEGIC IMPORTANCE BOTH FOR THE COMPANY ITSELF AND FOR THE COUNTRY'S ECONOMY. THE MAIN FOCUS IN THIS AREA IS TO ENSURE SUSTAINABLE GROWTH AND CREATE LONG-TERM VALUE FOR SHAREHOLDERS AND INVESTORS.

The procedures for the formation and approval of a Business Plan and budgets, including a Capital Investment Plan for the implementation of investment projects (construction, reconstruction and modernization of facilities), are regulated by the Rules for the development, coordination, approval, adjustment, execution and monitoring of the execution of the Action Plan (Business Plan) and Budgets of KEGOC JSC.

The business plan is formed for a 5-year period on a rolling basis and includes consolidated data from subsidiaries. An annual budget is approved annually for the implementation of the Business Plan. The Board of Directors of KEGOC JSC monitors the execution of the Business Plan on a quarterly basis.

GRI 201-1, 201-4

### Distribution of economic value, million tenge

	2022	2023	2024
<b>Total capitalization</b>	<b>809,916.9</b>	<b>849,254.52</b>	<b>931,502.5</b>
own capital	653,565.16	685,719.13	769,921.8
borrowed capital	156,351.70	163,535.39	161,580.7
<b>Funds received from the State</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Economic value created</b>	<b>227,003.95</b>	<b>263,910.63</b>	<b>337,695.7</b>
income from core business	217,255.55	252,136.38	319,905.9
financial income	5,726.12	7,576.47	11,886.4
other income	4,022.29	4,197.78	5,903.3
<b>Distributed economic value</b>	<b>217,270.65</b>	<b>253,879.87</b>	<b>322,768.5</b>
labor costs	26,755.43	33,272.86	37,980.5
expenses on taxes and fees to the state budget	18,026.52	21,610.03	26,644.8
payments to capital suppliers	30,309.24	47,075.04	56,872.9
charitable and sponsorship assistance	0	0	1,000.0
expenses for financing political parties and associations*	0	0	0
other operating expenses	136,625.19	148,327.37	190,082.4
other non-operating expenses	5,554.26	3,594.57	10,187.9
Profit after tax for the year from discontinued operations	0	0	0
<b>Economic cost to distribute</b>	<b>9,733.30</b>	<b>10,030.77</b>	<b>14,927.2</b>

\* Contributions or expenses to political campaigns or organizations, lobbying, trade associations, tax-exempt organizations, or other groups that influence political campaigns or government policies and legislation.



## BALANCE ANALYSIS

Indicators of the economic balance of KEGOC JSC, million tenge

Indicator, million tenge	2020	2021	2022	2023	2024	2024/2023
Non-current assets	695,193	1,019,820	873,933	881,415	960,180	109%
Current assets	116,820	73,397	12,679	120,371	136,886	114%
Total assets	812,013	1,093,217	986,612	1,001,785	1,097,066	110%
Capital	502,557	737,137	653,565	685,719	769,922	112%
Long-term obligations	239,767	310,397	273,570	277,540	289,230	104%
Short-term obligations	69,689	45,684	59,477	38,526	37,914	98%
Total liabilities	309,456.1	356,080.5	333,047	316,066	327,144	104%
Total equity and liabilities	812,013	1,093,217	986,612	1,001,785	1,097,066	110%

AS OF DECEMBER 31, 2024, THE COMPANY'S ASSETS AMOUNTED TO KZT 1,097,066.1 MILLION, AN INCREASE OF 10% COMPARED TO 2023.

Long-term assets account for 87.5% of the balance sheet structure, which is mostly represented by fixed assets. By the end of 2024, long-term assets showed an increase of 8.9% or 78,765.8 million tenge and amounted to 960,180.3 million tenge.

Short-term assets account for 12.5% of the balance sheet. In 2024, they increased by 13.7% (or by KZT 16,515.3 million) and amounted to KZT 136,885.8 million at the end of the year. The increase was driven by an increase in other financial assets as a result of coupon bonds of Samruk-Kazyna JSC, as well as cash and cash equivalents at the end of the period.

Capital at the end of 2024 amounts to KZT 769,921.8 million, an increase of 12.3% by 2023,

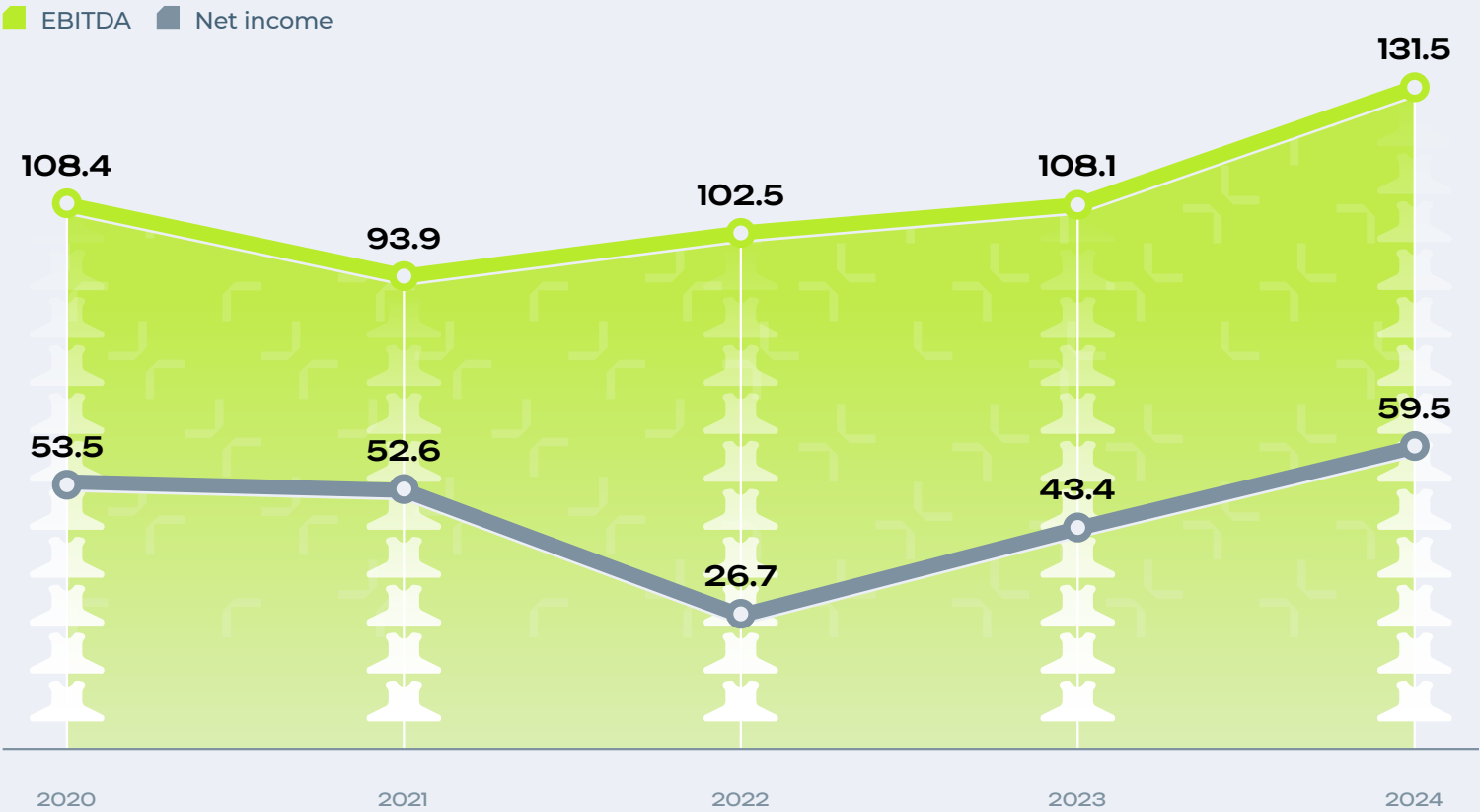
or KZT 84,202.7 million, mainly due to the revaluation of fixed assets in December 2024 and the growth of retained earnings. The share of capital in the balance sheet structure was 70.2%.

Liabilities for the year amounted to KZT 327,144.3 million, an increase of 3.5% or KZT 11,078.4 million compared to 2023. 88.4% of liabilities are long-term, 11.6% are short-term. The change was due to a decrease in loan obligations due to the planned repayment of the loan from the International Bank for Reconstruction and Development, an increase in deferred income tax liability by KZT 14,057.5 million as a result of the revaluation of fixed assets in December 2024.

Stable financial performance allows the Company to fulfill its obligations to its main stakeholders on time and in full:

- ◆ to pay salaries to employees and provide social support;
- ◆ on payment of dividends to shareholders;
- ◆ to implement investment projects and improve the quality and reliability of the NPG operation;
- ◆ on timely settlements with suppliers;
- ◆ on payment of taxes.

Profitability indicators of KEGOC JSC , billion tenge



Indicators for the implementation of Goal 3

Name of the KPI	2019	2020	2021	2022	2023	2024
	Actual	Actual	Actual	Actual	Actual	Actual
TSR (total shareholder return), %	The indicator was determined in December 2021			-10.7	3.44	13.96
EBITDA, billion tenge	88.5	108.4	93.9	102.5	108.1	131.5

The actual value of the TSR indicator was affected by an increase in the Company's share price in 2024 to 1,527 tenge per share compared to 1,482 tenge per share in the same period last year, while the Company paid 161.9 tenge of dividends per share at the end of the

year. EBITDA growth is mainly influenced by changes in volumes and tariffs for regulated services, as well as changes in the purchase price of electricity from a Single Buyer.



# APPENDICES



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# APPENDIX 1. ABOUT THE REPORT

## APPROACH TO REPORTING

### GRI 2-3

This 2024 Annual Report of KEGOC JSC provides a comprehensive overview of the Company's activities across all key areas, including sustainable development efforts and audited financial statements for 2024. Information on sustainability activities is disclosed in the format and scope in which KEGOC JSC has traditionally reported since 2009. The Company continues its practice of publishing and making sustainability-related information publicly available in the second quarter on an annual basis.

### GRI 2-3, 2-14

In accordance with the Charter of KEGOC JSC, Annual Reports and Sustainability Reports prepared by the Management Board and preliminarily reviewed by the Committee for Strategy, Corporate and Sustainable Development and the Audit Committee, are approved by the Board of Directors of KEGOC JSC. The previous Sustainability Report of KEGOC JSC for 2023, which was included in the 2023 Annual Report, was approved by the Board of Directors of KEGOC JSC and published in May 2024. All of the Company's reports are available on the official website of KEGOC JSC.

### GRI 2-5

The Company engaged an independent third party, selected through a competitive process, to verify the indicators related to material topics. The list of topics and indicators is provided in the "Materiality Analysis" section of this appendix. The independent auditor's report is presented in [Appendix 7](#).

## PRINCIPLES OF REPORT PREPARATION

In preparing the part of the Annual Report related to reporting on sustainable development activities, the Company applies the following principles of the GRI Standards:

Accuracy	The information presented in this Report has been compiled based on documented data and allows stakeholders to assess the Company's performance. Audited financial statements prepared in accordance with IFRS were used to prepare the sections of this Report relating to the economy.
Balance	This Report reflects positive and negative themes of KEGOC JSC's performance.
Clarity	KEGOC JSC endeavors to make this Report understandable and accessible to a wide range of stakeholders. To understand specific terms and abbreviations, a glossary is provided at the end of the report.
Comparability	This Report has been prepared in accordance with the GRI Standards, which allows stakeholders to compare the performance of KEGOC JSC with that of other organizations. The indicators disclosed in this Report are presented in dynamics for the last five years.
Completeness	This Report contains information on the activities of all MES branches, NDC SO branch, Executive Directorate, subsidiary organisation Energoinform JSC on all significant economic, environmental and social impacts, taking into account the specifics of the industry. In some cases, to avoid duplication of information, references to KEGOC JSC's website or publicly available documents are provided.
Context of sustainable development	The data in this Report is presented in the context of sustainable development as defined by the Corporate Governance Code of KEGOC JSC, including three components: economic, environmental and social. KEGOC JSC's Development Strategy defines goals, objectives, key initiatives and strategic KPIs in the field of sustainable development, and information on their achievement for 2023 is included in this Report.
Timeliness	The preparation of this Report is of a planned nature and is published in the second quarter of the year following the reporting year.
Verifiability	All information in the Report is based on data that can be verified, including official statistical reports, reports to regulatory authorities, information posted on the Company's website and KASE, SAP ERP digital platform, audited financial statements and others.

REPORTING BOUNDARIES

GRI 2-2

KEGOC JSC has prepared this Report on a corporate-wide level sustainability-related data presented herein includes data from KEGOC JSC's subsidiary, Energoinform JSC.

The sustainability information in this Report was prepared in accordance with the GRI Universal Standards 2021 (In accordance), the SASB sector standard for Electric Utilities & Power Generators, and the AA1000SES Stakeholder Engagement Standard. It describes the Company's relevant activities for the period from January 1 to December 31, 2024.

Any information related to future plans provided in this Annual Report is forward-looking and reflects KEGOC JSC's current views on future events. It is subject to certain risks, uncertainties, and assumptions related to KEGOC JSC's business, financial condition, operational results, growth strategy, and liquidity.

CONTRIBUTION TO THE UN SUSTAINABLE DEVELOPMENT GOALS

This Report includes information affirming KEGOC JSC's commitment to the principles of the UN Global Compact and outlines efforts related to the SDGs, adopted by all UN member states in 2015 as part of the 2030 Agenda for Sustainable Development.

We believe that the primary contribution of any business to the achievement of the SDGs lies in job creation, tax payments, and socio-economic development, as well as environmental stewardship. In addition, real and long-term positive change can only be achieved by managing our environmental impacts (broadly defined), engaging purposefully, cooperating with key actors and stakeholders, and expanding our efforts.

Each year, we will report on the SDGs most closely linked to our activities. Moreover, we analyze the areas where we have the greatest potential to make a difference. We examine where our operations may have negative impacts and identify where we possess unique opportunities to drive positive change in collaboration with stakeholders. This assessment considers factors such as the relevance of each goal and its targets to our value chain, alignment with our commitment to responsible and sustainable development, our ability to leverage our skills, competencies, and resources to drive change, and the importance of the issues to our stakeholders.

Key highlighted SDGs worked on in 2024








Contribution to the Achievement of the UN Sustainable Development Goals in 2024

UN SDG	Key Targets	Contribution to the Achievement of the UN SDG in 2024
<div><div>4</div><div>QUALITY EDUCATION</div><div></div></div> <p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p>	<p>4.4. By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.</p>	<ul style="list-style-type: none"><li>◆ Average training hours per employee — 34 hours.</li><li>◆ Average training and development expenditure per employee — KZT 126,800.</li><li>◆ KEGOC JSC held a Youth Forum, which included meetings with Company management, strategic sessions, training on “Change Management,” and outdoor physical activities. The Forum was attended by 53 participants.</li><li>◆ 435 students completed internships at KEGOC JSC.</li></ul>
<div><div>7</div><div>AFFORDABLE AND CLEAN ENERGY</div><div></div></div> <p>Ensure access to affordable, reliable, sustainable and modern energy for all</p>	<p>7.1 By 2030, ensure universal access to affordable, reliable and modern energy services.</p> <p>7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.</p>	<ul style="list-style-type: none"><li>◆ Actual volume of electricity transmission services through the NPG in 2024 — 19.0 billion kWh.</li><li>◆ Environmental permits for the construction phase of the “Strengthening the Southern Zone of the Unified Power System of Kazakhstan” project were obtained.</li><li>◆ Measures to optimise the operating modes of the UPS of the Republic of Kazakhstan resulted in electricity savings of 5.042 million kWh in 2024.</li></ul>
<div><div>8</div><div>DECENT WORK AND ECONOMIC GROWTH</div><div></div></div> <p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>	<p>8.5 Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.</p> <p>8.6 Substantially reduce the proportion of youth not in employment, education or training.</p>	<ul style="list-style-type: none"><li>◆ In 2024, KEGOC JSC employed over 4,400 people.</li><li>◆ 143 external candidates were hired and 33 vacancies were filled by internal candidates. The percentage of vacancies filled internally — 17.3%.</li><li>◆ A Youth Forum was held, and representatives from branches participated in the “Zheti Qadam” modular young leaders development program.</li></ul>
<div><div>9</div><div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div><div></div></div> <p>Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation</p>	<p>9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.</p>	<ul style="list-style-type: none"><li>◆ Total spending on innovation and R&amp;D in 2024 KZT 56.75 million.</li><li>◆ The project “Development of Algorithms in the Centralized System for Automatic Frequency and Power Control for Managing Energy Storage Systems” was completed. The goal was to enhance the reliability of the National Electric Grid of Kazakhstan during the integration of renewable energy sources.</li></ul>

Contribution to the Achievement of the UN Sustainable Development Goals in 2024

UN SDG	Key Targets	Contribution to the Achievement of the UN SDG in 2024
<div><div>11SUSTAINABLE CITIES AND COMMUNITIES</div><div></div></div> <div>Make cities and human settlements inclusive, safe, resilient and sustainable</div>	11.2 Provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.	<ul style="list-style-type: none"><li>◆ As part of the “Integration of the Western Kazakhstan Energy System with the Unified Energy System of Kazakhstan” project, funded by loans from the EBRD, “Open Day” events were held in all regions involved in the project. These events included meetings with local residents and representatives of regional NGOs.</li></ul>
<div><div>12RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div></div></div> <div>Ensure sustainable consumption and production patterns</div>	12.4 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle and significantly reduce their release to air, water and soil to minimize their adverse impacts. 12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.	<ul style="list-style-type: none"><li>◆ Continued identification of PCB-containing equipment at KEGOC JSC substations in compliance with the Stockholm Convention, national regulations, and environmental protection rules. MES branches updated PCB equipment registries and submitted them to territorial environmental protection authorities.</li><li>◆ Laboratory analysis of transformer oil for PCB content was conducted at Akmola and Northern MES branches; no PCBs were detected.</li><li>◆ Hazardous waste was transferred to licensed third-party organisations for recycling, neutralisation, and/or disposal. Total waste transferred in 2024 — 3,523.22 tonnes.</li></ul>
<div><div>13CLIMATE ACTION</div><div></div></div> <div>Take urgent action to combat climate change and its impacts</div>	13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters. 13.2 Integrate climate change measures into policies, strategies and planning. 13.3 Improve education, awareness-raising and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	<ul style="list-style-type: none"><li>◆ KEGOC JSC raised and distributed KZT 54.7 million in voluntary aid to employees affected by floods.</li><li>◆ The KEGOC Climate Program for 2025–2060 was approved.</li><li>◆ Joined the international Net-zero initiative — Utilities for Net Zero Alliance (UNEZA).</li><li>◆ Board members participated in climate-related training and seminars, including “Climate Risk Management” and “Key Trends in Business Sector Adaptation to Climate Change.”</li></ul>

Principles of the UN Global Compact

Principles of the Global Compact	Report section	Principles of the Global Compact	Report section
<b>Human rights principles</b>		<b>Environment principles</b>	
Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights.	Corporate Ethics	Principle 7. Businesses should support a precautionary approach to environmental issues.	Environmental Protection
Principle 2. Business should not be complicit in human rights abuses.		Principle 8. Businesses should take initiatives to increase environmental responsibility.	
<b>Labour Principles</b>		Principle 9. Businesses should promote the development and dissemination of environmentally sound technologies.	
Principle 3. Businesses should support freedom of association and real recognition of the right to collective bargaining.	HR Policy	<b>Anti-corruption principles</b>	
Principle 4. Businesses should advocate for the elimination of all forms of forced and compulsory labour.		Principle 10. Businesses should oppose all forms of corruption, including extortion and bribery.	Anti- Corruption
Principle 5. Businesses should advocate for the complete eradication of child labour.			
Principle 6. Businesses should advocate for the elimination of discrimination in employment.			



MATERIALITY DEFINITION

GRI 3-1

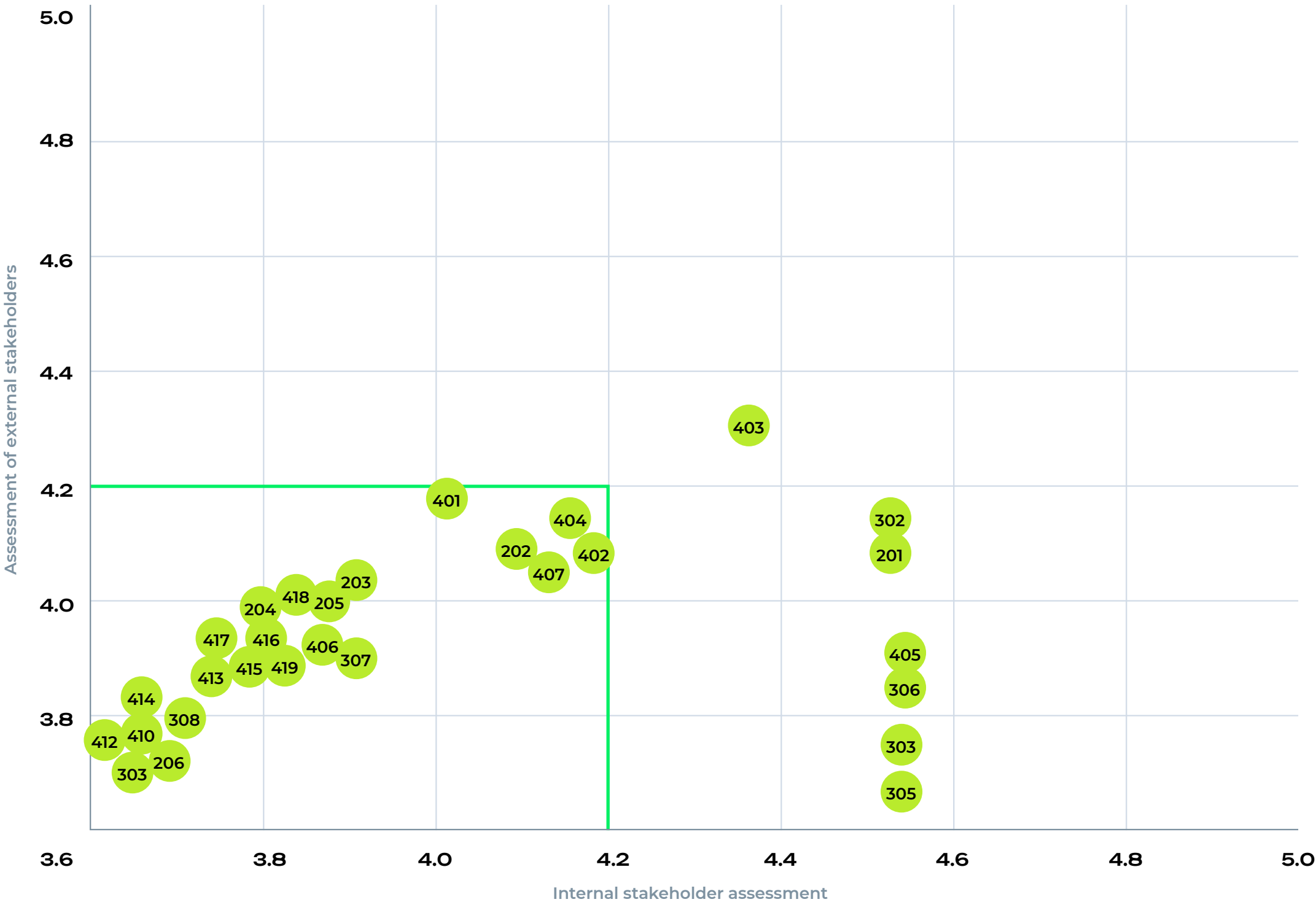
The Company strives to disclose information in the Annual Report that is current and material to stakeholders. KEGOC JSC conducts an annual materiality assessment based on surveys of both external and internal stakeholders. In 2024, a comprehensive list of topics was considered during the materiality identification process, including the Company’s governance specifics, economic performance, human rights compliance, and the Company’s impact on society and the environment, taking into account industry characteristics.

In line with the GRI materiality principle, a five-point scale survey assessment was conducted in August 2024 to determine the most relevant sustainable development topics. This involved both internal and external stakeholders who have a significant influence on the Company. The assessment was carried out in the form of a questionnaire. The 2024 materiality analysis was based on the “double materiality” approach. As part of the preparation of this Report, a stakeholder survey was conducted, resulting in the collection of 243 completed questionnaires: 120 from external stakeholders (consumers) and 123 from internal stakeholders (shareholders, Company employees).

Following the survey, the assessment results were reviewed and approved by the Coordinating Council on Sustainable Development and IMS (Minutes No. 2 dated 21 October 2024). In addition, an analysis of internal documents was conducted to identify stakeholder priorities and key trends in sustainable development.

Based on the collected data and the conducted analysis, a Materiality Matrix was developed, within which 7 priority topics were identified as having the highest relevance for the Company and its stakeholders.

Materiality matrix



GRI 3-2

Material topics and most significant impacts

GRI 3-2, 3-3

Material Topics	Impact	Key stakeholders
201 Economic Performance	Positive impact is reflected in the sustainable growth of financial indicators, enabling the Company to invest in infrastructure modernization, innovation development, and improvements in energy efficiency and reliability. This also contributes to job creation and increased tax contributions. Negative impact may arise from financial instability, growing debt, or a decline in investment appeal, adversely affecting sector development and stakeholder trust.	Shareholders and investors, government authorities, suppliers and contractors, employees, local communities
302 Energy	Positive impact includes reduced greenhouse gas emissions due to the integration of RES. Negative impact may result from delays in phasing out fossil fuels if RES deployment is insufficient.	Local communities, service consumers, suppliers
303 Water and Effluents	KEGOC JSC’s focus on minimizing the environmental impact of its assets may help build a positive relationship with the local population. Conversely, the lack of clear commitments to reduce environmental harm may cause stakeholder dissatisfaction and hinder investment project implementation.	Local communities, creditors, suppliers, business partners
305 Emissions		
306 Waste		
403 Occupational Health and Safety	Effective control and support of the occupational health and safety system positively affect the psychological and physical well-being of employees. Neglect of these areas results in higher injury rates and dissatisfaction.	Employees, suppliers, business partners
405 Diversity and Equal Opportunity	Positive impact includes the creation of an inclusive and equitable working environment, fostering productivity and an improved corporate climate. Negative impact may stem from insufficient representation of vulnerable groups, potentially leading to social tension and legal consequences.	Employees, local communities, investors, creditors

The results of the 2024 stakeholder survey analysis were compared with those of the 2023 assessment. In addition to the topics identified as material in the 2023 analysis, the topic of “Water and Effluents” was selected by stakeholders as material. Nevertheless, most GRI topics are disclosed in this Report, including to comply with the Information Disclosure Rules for security issuers of the KASE and AIX stock exchanges, the recommendations of the TCFD, and the requirements of the SASB standard.



# APPENDIX 2. INDICATORS

## HR POLICY



### GRI 405-1

Indicator	Unit	2020	2021	2022	2023	2024	2024/2023	2024/2023, %
HR Indicators								
Headcount	persons	4,371	4,400	4,376	4,446	4,495	49	1.10%
of which:								
male	persons	3,465 (73.2%)	3,377 (76.8%)	3,367 (76.9%)	3,409 (76.7%)	3,456 (76.9%)	47	1.38%
female	persons	1,266 (26.8%)	1,023 (23.2%)	1,009 (23.1%)	1,037 (23.3%)	1,039 (23.1%)	2	0.19%
SRS Index	%	91	85	86	86	87	1	-
Employee engagement index	%	90	85	-	-	87	0	-
Development and Training								
Average annual training hours per employee	hours	23.0	22.3	27.6	25.96	41.23	15.27	58.82%
of which:								
male	hours	22.7	21.9	27.7	30.2	32.8	2.6	8.61%
female	hours	26.3	25.5	26.9	12	8.5	-3.5	-29.17%
Administrative staff	hours	23.7	21.5	27.1	18.2	7.2	-11	-60.44%
Production staff	hours	22.9	22.4	27.6	27.1	34	6.9	25.46%

Total headcount by employment type and gender as of 31 December 2024, persons

GRI 2-7

Subdivision	Full-time employment, persons			Rotation-based employment, persons			Part-time employment, persons			Total
	Total	male	female	Total	male	female	Total	male	female	
Akmola MES	546	454	92	0			12	10	2	558
Aktobe MES	267	215	52	0			0			267
Almaty MES	472	398	74	5	5		1	1		478
Eastern MES	294	239	55	0	0	0	1	1	0	295
Western MES	213	160	53	51	51		0			264
Sarbai MES	419	339	80	0			0			419
Northern MES	382	285	97	0			2	2		384
Central MES	417	340	77	7	7		0			424
Southern MES	432	361	71	0			2	1	1	434
NDC SO	106	64	42	0			2	1	1	108
Executive Directorate	374	197	177	0			0			374
Energoinform JSC	486	321	165	2	2		2	2		490
Total	4,408	3,373	1,035	65	65	0	22	18	4	4,495

\* In accordance with Article 70 of the Labour Code of the Republic of Kazakhstan, the employer is obliged to establish a part-time working schedule upon written request from a pregnant woman, one of the parents (adoptive parents) of a child (children) under three years of age, or an employee caring for a sick family member based on a medical certificate.

Total number and percentage of new hires and employee turnover by age group and gender

	Number of employees hired in 2024	% of total headcount as of 31.12.2024	Number of employees who left in 2024	% of total headcount as of 31.12.2024
	people	%	people	%
Company total:	472	10.50	412	9.17
By gender				
male	388	82.20	332	74.44
female	84	16.97	80	17.94
By age				
under 30 years	181	38.35	81	18.16
from 31 to 50 years	248	52.54	199	44.62
over 50 years	43	9.11	132	29.60

Total number and percentage of newly hired employees, as well as staff turnover by division, including internal transfers

Division	Number of employees hired in 2024		Number of employees who left the Company in 2024	
	people	%	people	%
Executive Directorate	42	8.48	40	8.97
Akmola MES	66	13.33	79	17.71
Aktobe MES	21	4.24	16	3.59
Almaty MES	51	10.30	47	10.54
Eastern MES	19	3.84	14	3.14
Western MES	27	5.45	15	3.36
Sarbai MES	47	9.49	39	8.74
Northern MES	51	10.30	48	10.76
Central MES	53	10.71	49	10.99
Southern MES	39	7.88	37	8.30
NDC SO	11	2.22	4	0.90
Energoinform JSC	68	13.74	58	13.00
Total	495	11.01	446	9.92



Number of employees hired and employees who left the Company, people

Indicator	2020		2021		2022		2023		2024		2024/2023	2024/2023, %
	people	%	people	%	people	%	people	%	people	%	people	%
Number of hired employees, total	343	7.25	451	10.25	551	12.59	543	12.21	495	11.01	-48	-0.09
by age:												
Under 30 years	140	2.96	214	47.45	222	5.07	209	29.48	185	26.66	-24	-0.11
From 31 to 50 years	168	3.55	194	43.02	276	6.31	274	11.14	267	18.34	-7	-0.03
From 51 years	35	0.74	43	9.53	53	1.21	60	4.69	43	4.04	-17	-0.28
by gender:												
male	263	5.56	364	80.71	441	10.08	436	12.78	404	11.69	-32	-0.07
famela	80	1.69	87	19.29	110	2.51	107	10.31	91	8.76	-16	-0.15
By division:												
Executive Directorate	15	4.03	26	7.34	70	19.39	56	15.05	42	7.53	-14	-0.25
Akmola MES	46	8.01	69	11.98	72	12.70	65	11.38	66	24.72	1	0.02
Aktobe MES	15	5.93	27	10.63	28	11.20	31	11.83	21	4.39	-10	-0.32
Almaty MES	29	6.12	35	7.46	57	12.34	48	10.13	51	17.29	3	0.06
Eastern MES	17	5.94	29	9.80	20	6.94	30	10.34	19	7.20	-11	-0.37
Western MES	28	12.23	39	16.46	36	15.13	40	15.87	27	6.44	-13	-0.33
Sarbai MES	17	4.10	49	11.81	47	11.55	44	10.71	47	12.24	3	0.07
Northern MES	16	4.29	42	11.29	43	11.29	44	11.55	51	12.03	7	0.16
Central MES	26	6.25	23	5.71	56	13.66	44	10.48	53	12.21	9	0.20
Southern MES	24	5.58	28	6.56	47	10.71	34	7.87	39	36.11	5	0.15
NDC SO	6	6.32	8	8.25	9	9.00	11	10.89	11	2.94	0	0.00
Energoinform JSC	92	11.79	76	15.20	66	13.95	96	20.00	68	13.88	-28	-0.29
Number of employees who left, total	421	8.90	748	17.0	575	13.14	473	10.63	446	9.92	-27	-0.06
by age:												
under 30 years	82	1.73	161	3.65	134	3.06	100	14.10	86	12.39	-14	-0.14
from 31 to 50 years	170	3.59	362	8.22	254	5.80	220	8.95	216	14.84	-4	-0.02
from 51 years	169	3.57	225	5.11	187	4.27	153	11.97	144	13.53	-9	-0.06
by gender: %												
male	290	6.13	438	9.95	451	10.31	394	11.55	357	10.33	-37	-0.09
female	131	2.77	310	7.04	124	2.83	79	7.6	89	8.57	10	0.13

Indicator	2020		2021		2022		2023		2024		2024/2023	2024/2023, %
	people	%	people	%	people	%	people	%	people	%	people	%
By division:												
Executive Directorate	29	7.80	44	5.88	63	13.32	45	12.10	40	7.17	-5	-0.11
Akmola MES	54	9.41	67	8.96	81	14.29	61	10.68	79	29.59	18	0.30
Aktobe MES	16	6.32	26	3.48	32	12.80	19	7.25	16	3.35	-3	-0.16
Almaty MES	32	6.75	40	5.35	64	13.85	36	7.59	47	15.93	11	0.31
Eastern MES	28	9.79	19	2.54	28	9.72	28	9.66	14	5.30	-14	-0.50
Western MES	26	11.35	31	4.14	35	14.71	26	10.32	15	3.58	-11	-0.42
Sarbai MES	29	6.99	49	6.55	55	13.51	40	9.73	39	10.16	-1	-0.03
Northern MES	33	8.85	43	5.75	34	8.92	44	11.55	48	11.32	4	0.09
Central MES	22	5.29	36	4.81	49	11.95	34	8.10	49	11.29	15	0.44
Southern MES	30	6.98	31	4.14	35	7.97	41	9.49	37	34.26	-4	-0.10
NDC SO	3	3.16	6	0.80	6	6.00	10	9.90	4	1.07	-6	-0.60
Energoinform JSC	104	13.33	356	47.59	93	19.66	89	18.54	58	11.84	-31	-0.35
Staff turnover (voluntary), %		4.7		8.22		8.13		6.51		6.21		



PRODUCTION INDICATORS



GRI EU1, EU3, EU4, EU28, EU29

Indicator	Unit	2020	2021	2022	2023	2024	2024/2023	2024/2023, %
Installed transmission capacity by primary energy sources and regulation mode	MVA	38,746.05	38,742.90	39055.9	39,112.60	38,893.60	-219	-0.56%
of which:								
1150 kV substations	MVA	9,384.10	9,384.10	9,384.10	9,384.10	9,384.10	0	0.00%
500 kV substations	MVA	17,447.50	17,447.50	17,447.50	17,447.50	17,467.50	20	0.11%
220 kV substations	MVA	11891.25	11,888.10	12,201.10	12,257.80	12,018.80	-239.00	-1.95%
35 kV substations	MVA	23.20	23.20	23.2	23.2	23.2	0	0.00%
Total length of overhead and cable power transmission lines by regulation mode (by circuits)	km	26,997.92	26,973.23	26,977.22	27,807.45	27,905.42	97.96	0.35
of which:								
1150 kV	km	1,421.23	1,421.23	1,421.23	1,421.23	1,421.23	-	-
500 kV	km	8,287.98	8,282.26	8,282.26	8,281.93	8,281.13	-0.800	-0.01
330 kV	km	1,863.28	1,863.28	1,863.28	1,863.28	1,862.94	-0.343	-0.02
220 kV	km	14,898.86	14,893.06	14,890.22	15,669.58	15,766.65	97.067	0.62
110 kV	km	352.84	352.84	352.84	352.84	352.84	-	-
35 kV	km	44.13	44.13	44.13	44.13	44.13	-	-
below 35 kV	km	129.61	116.44	123.26	174.463	176.503	2.04	1.17%
Number of electricity consumers (contracts)	psc.	861	951	1,141	1,629	1,629	-	-
Frequency of power outages — SAIFI		0.07	0.12	0.04	0.05	0.083	0.033	66.00%
Average duration of power outages — SAIDI	hours	0.16	0.09	0.06	0.07	0.019	-0.051	-72.86%
The volume of services rendered								
Electricity transmission	billion kWh	46.16	54.65	58.57	39.24	19.0	-20.3	-51.7
Use of the National Electric Grid (NPG)	billion kWh	-	-	-	35.98	74.9	38.9	108.2
Technical dispatching	billion kWh	98.99	105.04	104.26	106.28	110.9	4.6	4.3
Balancing electricity production and consumption	billion kWh	192.86	205.15	203.12	205.41	210.3	4.9	2.4

Economic indicators

Economic indicators							GRI 201-1, 201-4	
Indicator	Unit	2020	2021	2022	2023	2024	2024/2023	2024/2023, %
Total capitalisation:	million tenge	663,590.5	908,336.3	809,916.9	849,254.5	931,502.5	82,248.0	9.68
equity capital	million tenge	502,556.5	737,136.8	653,565.2	685,719.1	769,921.8	84,202.7	12.28
borrowed capital	million tenge	161,034.0	171,199.5	156,351.7	163,535.4	161,580.7	-1,954.7	-1.20
Funds received from the state	million tenge	-	-	-	-	-	-	-
Economic value created:	million tenge	185,852.9	199,424.1	227,003.9	263,910.6	337,695.7	73,785.1	27.96
operating income	million tenge	179,097.6	186,443.1	217,255.6	252,136.4	319,905.9	67,769.5	26.88
financial income	million tenge	5,480.2	5,368.2	5,726.1	7,576.5	11,886.4	4,309.9	56.89
other income	million tenge	1,275.1	7,612.7	4,022.3	4,197.8	5,903.3	1,705.5	40.63
Economic value distributed:	million tenge	170,101.5	201,789.2	217,270.7	253,879.9	322,768.5	68,888.6	27.13
labour costs	million tenge	21,101.7	23,672.5	26,755.4	33,272.9	37,980.5	4,707.6	14.15
expenses on taxes and fees to the state budget	million tenge	21,334.1	14,047.3	18,026.5	21,610.0	26,644.8	5,034.8	23.30
payments to capital providers	million tenge	43,952.8	53,200.0	30,309.2	47,075.0	56,872.9	9,797.9	20.81
charity and sponsorship support	million tenge	-	-	-	-	1,000.0	1,000	100
other operating costs	million tenge	77,761.3	99,492.0	136,625.2	148,327.4	190,082.4	41,755.0	28.15
other non-operating expenses	million tenge	5,951.5	11,377.4	5,554.3	3,594.6	10,187.9	6,593.3	183.42
Profit after tax for the year from discontinued operations	million tenge	4,967.0	13,471.5	-	-	-	-	-
Economic value attributable	million tenge	20,718.5	11,106.3	9,733.3	10,030.8	14,927.2	4,896.4	48.81
Percentage of senior management hired from the local community at significant locations of operation	%	90.9	90.9	85.7	100	100	-	-

Compliance with laws and regulatory requirements

Compliance with laws and regulatory requirements						GRI 2-27, 205-3	
Indicator	Unit	2020	2021	2022	2023	2024	
Confirmed incidents of corruption and actions taken*	-	0	0	0	0	0	
Monetary value of significant fines and total number of non-monetary sanctions imposed for non-compliance with laws and regulations in the socio-economic area	million tenge	0	0	0	0	0	
of which:							
monetary value of significant fines imposed for non-compliance with laws and regulations concerning the provision and use of products and services	million tenge	0	0	0	0	0	
monetary value of significant fines and total number of non-monetary sanctions imposed for non-compliance with environmental laws and regulations	million tenge	0	0	0	0	0	

\* In 2024, there were no incidents in which employees were dismissed or otherwise disciplined for corruption, no contracts were terminated with business partners due to corruption-related violations, and no legal cases involving corruption were brought against the Company or its employees.



ENVIRONMENTAL INDICATORS



GRI EU12, 302-1, 302-4

Indicator	Unit	2020	2021	2022	2023	2024	2024/2023	2024/2023, %
Energy consumption								
Percentage of energy transmission losses*	%	6.0	5.6	4.9	5.0	5.0	0	0%
Effect of energy-saving measures (loss reduction)	Thousand GJ	15.340	15.810	14.155	14.609	18.151	3.542	24%
Specific energy consumption	thousand GJ / thousand KZT	0.058	0.060	0.048	0.043	0.036	-0.007	-16%
Energy consumption within the organization	Thousand GJ	10,350, 517	11,162.799	10,374.628	10,817.816	11,369.620	551.804	5%
electricity	Thousand GJ	10,068.339	10,951.741	10,169.639	10,620.995	11,142.938	521.943	5%
heat energy	Thousand GJ	81.396	87.536	84.843	78.877	89.399	10.522	13%
Fuel:	Thousand GJ	114.065	123.521	120.146	117.945	137.284	19.339	16%
motor gasoline	Thousand GJ	44.768	41.681	40.918	39.611	44.015	4.404	11%
diesel fuel	Thousand GJ	65.250	77.941	75.481	75.206	89.785	15.216	20%
natural gas	Thousand GJ	3.911	3.749	3.237	3.066	3.213	147	5%
liquefied ga	Thousand GJ	135	150	508.78	304	271	-33	-11%

\* Technological consumption of electricity from the supply of electricity to the grid during its transmission.

Occupational health and safety indicators

GRI 403-9

Indicator	2020	2021	2022	2023	2024
Rate of recorded occupational injuries	0	0.03	0	0	0
By divisions:					
Executive Directorate	0	0	0	0	0
Akmola MES	0	0	0	0	0
Aktobe MES	0	0.45	0	0	0
Almaty MES	0	0	0	0	0
Eastern MES	0	0	0	0	0
Western MES	0	0	0	0	0
Sarbai MES	0	0	0	0	0
Northern MES	0	0	0	0	0
Central MES	0	0	0	0	0
Southern MES	0	0	0	0	0
NDC SO	0	0	0	0	0
Rate of serious injuries (excluding fatalities)	0	0.03	0.05	0.03	0
By divisions:					
Executive Directorate	0	0	0	0	0
Akmola MES	0	0	0	0	0
Aktobe MES	0	0.45	0	0	0
Almaty MES	0	0	0	0	0
Eastern MES	0	0	0.41	0	0
Western MES	0	0	0	0	0
Sarbai MES	0	0	0	0	0
Northern MES	0	0	0	0.3	0
Central MES	0	0	0	0	0
Southern MES	0	0	0.27	0	0

Indicator	2020	2021	2022	2023	2024
NDC SO	0	0	0	0	0
Number of serious injuries (excluding fatalities)	0	0	2	1	0
Fatality rate	0	0	0.02	0	0
By divisions:					
Executive Directorate	0	0	0	0	0
Akmola MES	0	0	0	0	0
Aktobe MES	0	0.45	0	0	0
Almaty MES	0	0	0	0	0
Eastern MES	0	0	0.41	0	0
Western MES	0	0	0	0	0
Sarbai MES	0	0	0	0	0
Northern MES	0	0	0	0	0
Central MES	0	0	0	0	0
Southern MES	0	0	0	0	0
NDC SO	0	0	0	0	0
Number of fatalities	0	0	1	0	0
Education, training and exercises in the field of civil defense and emergency situations:					
Republican-level command and staff exercises	2	2	-	3	5
Staff drills	4	2	-	7	8
Facility-level drills	2	2	20	15	13
Tactical-specialized civil defense exercises	2	3	21	6	8
Seismic drills	4	4	11	14	6
Training at republican/regional civil defense and emergency courses	32	36	11	23	34







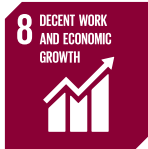

# APPENDIX 3. GRI INDICATORS TABLE



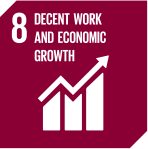



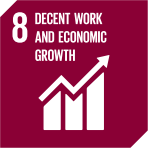


Statement of use	Kazakhstan Electricity Grid Operating Company (KEGOC) JSC prepared the Report in accordance with GRI standards for the period 01/01/2024-31/12/2024
Applicable GRI 1	GRI 1: Foundation 2021
Applicable GRI industry standards	GRI Electric Utilities (2016)

Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
GRI 2: General Disclosures 2021							
2-1	Organizational details				Company profile, <a href="#">p. 11</a> Share capital, <a href="#">p. 92</a>		
2-2	Entities included in the organization’s sustainability reporting				Appendix 1. About the Report, <a href="#">p. 138</a>		
2-3	Reporting period, frequency and contact point				Appendix 1. About the Report, <a href="#">p. 137</a> Contacts, <a href="#">p. 166</a>		
2-4	Restatements of information					No restatements were made	
2-5	External assurance				Appendix 1. About the Report, <a href="#">p. 137</a>		
2-6	Activities, value chain and other business relationships				Company Structure, <a href="#">p. 12</a> Business model, <a href="#">p. 14</a> Procurement Practices, <a href="#">p. 88</a>		
2-7	Employees				Personnel structure, <a href="#">p. 50</a> Appendix 2. Indicators, <a href="#">p. 144</a>		
2-8	Workers who are not employees				Personnel structure, <a href="#">p. 50</a>		
2-9	Governance structure and composition				Corporate governance, <a href="#">p. 91</a>		
2-10	Nomination and selection of the highest governance body				Report on the activities of the Board of Directors, <a href="#">p. 96</a> Committees of the Board of Directors, <a href="#">p. 105, 107, 108</a>		
2-11	Chair of the highest governance body				Composition of the Board of Directors, <a href="#">p. 97</a>		

Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
2-12	Role of the highest governance body in overseeing the management of impacts				Development Plan (Strategy), <a href="#">p. 23</a> Report on the activities of the Board of Directors, <a href="#">p. 96</a>		
2-13	Delegation of responsibility for managing impacts				Report on the activities of the Board of Directors, <a href="#">p. 96</a> Committees of the Board of Directors, <a href="#">p. 105</a> , <a href="#">107</a> , <a href="#">108</a> Management Board, <a href="#">p. 110</a>		
2-14	Role of the highest governance body in sustainability reporting				Report on the activities of the Board of Directors, <a href="#">p. 96</a> Appendix 1. About the Report, <a href="#">p. 137</a>		
2-15	Conflicts of interest				Conflict of interest, <a href="#">p. 109</a>		
2-16	Communication of critical concerns				Corporate ethics, <a href="#">p. 115</a>		
2-17	Collective knowledge of the highest governance body				Professional development, <a href="#">p. 109</a>		
2-18	Evaluation of the performance of the highest governance body				Management evaluation and remuneration, <a href="#">p. 113</a>		
2-19	Remuneration policies				Management evaluation and remuneration, <a href="#">p. 113</a>		
2-20	Process to determine remuneration				Management evaluation and remuneration, <a href="#">p. 113</a>		
2-21	Annual total compensation ratio	yes	confidential restrictions	Information on remuneration is disclosed in accordance with the Information Disclosure Rules for listing initiators of the Kazakhstan Stock Exchange JSC			
2-22	Statement on sustainable development strategy				Letter from the Chairman of the Board of Directors, <a href="#">p. 3</a> Letter from the Chairman of the Management Board, <a href="#">p. 4</a>		
2-23	Policy commitments				Development Plan (Strategy), <a href="#">p. 23</a> Environmental protection, <a href="#">p. 65</a> Respect for human rights, <a href="#">p. 116</a>		
2-24	Embedding policy commitments				Development Plan (Strategy), <a href="#">p. 23</a> Working with consumers, <a href="#">p. 30</a> Respect for human rights, <a href="#">p. 116</a>		
2-25	Processes to remediate negative impacts				Working with consumers, <a href="#">p. 30</a> Environmental protection, <a href="#">p. 65</a> Corporate ethics, <a href="#">p. 115</a>		
2-26	Mechanisms for seeking advice and raising concerns				Working with consumers, <a href="#">p. 30</a> Impact on biodiversity, <a href="#">p. 71</a> Procurement Practices, <a href="#">p. 88</a> Corporate ethics, <a href="#">p. 115</a>		



Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
2-27	Compliance with laws and regulations				Working with consumers, <a href="#">p. 30-31</a> Appendix 2. Indicators, <a href="#">p. 148</a>		
2-28	Membership associations				Partnership, <a href="#">p. 47</a>		
2-29	Approach to stakeholder engagement				Interaction with stakeholders, <a href="#">p. 43-46</a>		
2-30	Collective bargaining agreements				Collective agreement and trade union activities, <a href="#">p. 63</a>		
EU1	Installed production capacity, broken down by primary energy source and regulatory regime				Geography of activity, <a href="#">p. 13</a> Appendix 2. Indicators, <a href="#">p. 147</a>		
EU2	Net energy production, broken down by primary energy source and regulatory regime	yes	Not applicable	KEGOC JSC is not an energy producing company			
EU3	Number of electricity consumers				Working with consumers, <a href="#">p. 30</a> Appendix 2. Indicators, <a href="#">p. 147</a>		
EU4	Length of overhead and underground transmission lines, broken down by regulatory regime				Geography of activity, <a href="#">p. 13</a> Appendix 2. Indicators, <a href="#">p. 147</a>		
EU5	Distribution of CO2e or its equivalent by greenhouse gas emission scheme		Not applicable	The company does not operate in markets with voluntary or legally binding CO2e emissions trading schemes			
EU28	Frequency of power outages				Network reliability, <a href="#">p. 32</a> Appendix 2. Indicators, <a href="#">p. 147</a>	 	
EU29	Average duration of power outages				Network reliability, <a href="#">p. 32</a> Appendix 2. Indicators, <a href="#">p. 147</a>	 	
3-1	Process to determine material topics				Appendix 1. About the Report, <a href="#">p. 141</a>		
3-2	List of material topics				Appendix 1. About the Report, <a href="#">p. 142</a>		
Economic Performance							
3-3	Management of material topics				Economic value generated and distributed value, <a href="#">p. 134</a>		
201-1	Direct economic value generated and distributed				Economic value generated and distributed value, <a href="#">p. 134</a> Appendix 2. Indicators, <a href="#">p. 148</a>	 	

Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
201-2	Financial implications and other risks and opportunities due to climate change				Network reliability, <a href="#">p. 33</a>		
201-3	Defined benefit plan obligations and other retirement plans	yes	Not applicable	Pension legislation of the Republic			
201-4	Financial assistance received from government	of Kazakhstan regulates the procedure for pension contributions			Economic value generated and distributed value, <a href="#">p. 134</a> Appendix 2. Indicators, <a href="#">p. 148</a>		
205-3	Confirmed incidents of corruption and	to the UAPF			Anti-corruption, <a href="#">p. 117</a> Appendix 2. Indicators, <a href="#">p. 148</a>		
Energy							
3-3	Management of material topics				Energy efficiency, <a href="#">p. 69</a>		
302-1	Energy consumption within the organization	yes	c. iii., iv./ d	The Company does not resell electricity or thermal energy to third parties. The Company does not consume or resell cooling or steam energy to third parties.	Energy efficiency, <a href="#">p. 69</a> Appendix 2. Indicators, <a href="#">p. 149</a>		   
302-2	Energy consumption outside of the organization		not applicable	Currently, the Company only tracks energy consumption within the organization; therefore, energy consumption outside the organization is not reflected in this Report.			
302-3	Energy intensity				Energy efficiency, <a href="#">p. 69</a>		   
302-4	Reduction of energy consumption				Energy efficiency, <a href="#">p. 70</a> Appendix 2. Indicators, <a href="#">p. 149</a>		
302-5	Reductions in energy requirements of products and services				Energy efficiency, <a href="#">p. 70</a>		


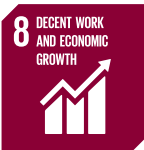

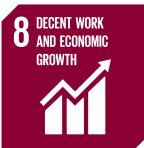





Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
EU12	Percentage of transmission and distribution losses				Energy efficiency, <a href="#">p. 69</a> Appendix 2. Indicators, <a href="#">p. 149</a>		<div><div><div>7</div><div>AFFORDABLE AND CLEAN ENERGY</div><div></div></div><div><div>8</div><div>DECENT WORK AND ECONOMIC GROWTH</div><div></div></div><div><div>12</div><div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div></div></div><div><div>13</div><div>CLIMATE ACTION</div><div></div></div></div>
Water resources and discharges							
3-3	Management of material topics				Impact on water bodies, <a href="#">p. 67</a>		
303-1	Interactions with water as a shared resource				Impact on water bodies, <a href="#">p. 67</a>		
303-2	Management of water discharge-related impacts				Impact on water bodies, <a href="#">p. 67</a>		
303-3	Water withdrawal				Impact on water bodies, <a href="#">p. 67</a>		
303-4	Water discharge			d. The Company does not track discharges of priority substances of concern.	Impact on water bodies, <a href="#">p. 67</a>		<div><div><div>6</div><div>CLEAN WATER AND SANITATION</div><div></div></div><div><div>12</div><div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div></div></div></div>
303-5	Water consumption			c. The Company does not track volumes of water stored for future use and does not disclose such information.	Impact on water bodies, <a href="#">p. 67</a>		
Emissions							
3-3	Management of material topics				Effect on atmospheric air, <a href="#">p. 66</a>		
305-1	Direct (Scope 1) GHG emissions	yes	c.not applicable	the Company does not generate biogenic emissions	Climate change metrics and targets, <a href="#">p. 82</a>		
305-2	Energy indirect (Scope 2) GHG emissions			b.not applicable	Climate change metrics and targets, <a href="#">p. 82</a>		
305-3	Other indirect (Scope 3) GHG emissions			the Company currently does not keep records of indirect greenhouse gas emissions (scope 3)			<div><div><div>3</div><div>GOOD HEALTH AND WELL-BEING</div><div></div></div><div><div>12</div><div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div></div></div><div><div>13</div><div>CLIMATE ACTION</div><div></div></div><div><div>15</div><div>LIFE ON LAND</div><div></div></div></div>
305-4	GHG emissions intensity				Climate change metrics and targets, <a href="#">p. 82-83</a>		
305-5	Reduction of GHG emissions				Energy efficiency, <a href="#">p. 70</a> Climate change metrics and targets, <a href="#">p. 82-83</a>		
305-6	Emissions of ozone-depleting substances (ODS)			In its operations, the Company does not emit ozone-depleting substances that affect climate change			

Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant	yes	a.iii Persistent organic pollutants (POPs) — not applicable a. v Hazardous air pollutants (HAPs) — not applicable	a.iii — The Company has no emissions from POPs a. v — Not applicable under the laws of the Republic of Kazakhstan	Effect on atmospheric air, <a href="#">p. 66</a>		
Waste							
3-3	Management of material topics				Waste management, <a href="#">p. 68</a>		
306-1	Water discharge by quality and destination				Waste management, <a href="#">p. 68</a>		<div><div>3 GOOD HEALTH AND WELL-BEING</div><div>6 CLEAN WATER AND SANITATION</div><div>11 SUSTAINABLE CITIES AND COMMUNITIES</div><div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div></div>
306-2	Waste by type and disposal method				Waste management, <a href="#">p. 68</a>		<div><div>3 GOOD HEALTH AND WELL-BEING</div><div>6 CLEAN WATER AND SANITATION</div><div>8 DECENT WORK AND ECONOMIC GROWTH</div><div>11 SUSTAINABLE CITIES AND COMMUNITIES</div><div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div></div>



Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
306-3	Waste generated				Waste management, <a href="#">p. 68</a>		
306-4	Waste diverted from disposal	yes	Partial disclosure	This indicator is partially disclosed based on the latest information available to the Company and for which the Company has an understanding.	Waste management, <a href="#">p. 68</a>		<div><div>3GOOD HEALTH AND WELL-BEING</div><div>6CLEAN WATER AND SANITATION</div></div>
306-5	Waste directed to disposal	yes	Partial disclosure	This indicator is partially disclosed based on the latest information available to the Company and for which the Company has an understanding	Waste management, <a href="#">p. 68</a>		<div><div>11SUSTAINABLE CITIES AND COMMUNITIES</div><div>12RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div>15LIFE ON LAND</div></div>
Occupational health and safety							
3-3	Management of material topics				Occupational health and safety, <a href="#">p. 85</a>		
403-1	Occupational health and safety management system				Occupational health and safety, <a href="#">p. 85</a>		
403-2	Hazard identification, risk assessment, and incident investigation				Occupational health and safety, <a href="#">p. 85-87</a>		
403-3	Occupational health services				Occupational health and safety, <a href="#">p. 85-88</a>		
403-4	Worker participation, consultation, and communication on occupational health and safety				Occupational health and safety, <a href="#">p. 85</a>		<div><div>3GOOD HEALTH AND WELL-BEING</div><div>6CLEAN WATER AND SANITATION</div></div>
403-5	Worker training on occupational health and safety				Occupational health and safety, <a href="#">p. 86-87</a>		
403-6	Promotion of worker health				Occupational health and safety, <a href="#">p. 86</a>		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships				Occupational health and safety, <a href="#">p. 86-87</a>		<div><div>8DECENT WORK AND ECONOMIC GROWTH</div><div>12RESPONSIBLE CONSUMPTION AND PRODUCTION</div></div>
403-8	Workers covered by an occupational health and safety management system				Occupational health and safety, <a href="#">p. 85</a> , <a href="#">87</a>		
403-9	Work-related injuries				Occupational health and safety, <a href="#">p. 87</a>	EU25	
403-10	Work-related ill health				Occupational health and safety, <a href="#">p. 86</a>		

Index of the indicator	Name of indicator	Completeness of disclosure			Section and page in the Report	Comments	UN SDG
		Requirement excluded	Reason	Description			
Gender equality							
3-3	Management of material topics				Personnel structure, <a href="#">p. 48</a>		
405-1	Diversity of governance bodies and employees				Personnel structure, <a href="#">p. 54</a> Composition of the Board of Directors, <a href="#">p. 101</a> Appendix 2. Indicators, <a href="#">p. 143</a>	 	
405-2	Ratio of basic salary and remuneration of women to men				Incentive system, <a href="#">p. 57</a>	  	
406-1	Incidents of discrimination and corrective actions taken				Respect for human rights, <a href="#">p. 116</a>	 	



# APPENDIX 4. SASB INDICATORS TABLE

Code	Metric	Report section and page / Comment	Unit of Measure
Water Resources			
IF-EU-140a.1	(1) Total water withdrawal; (2) Total water consumption; percentage of each from regions with high or extremely high baseline water stress	Impact on water bodies, <a href="#">p. 67</a>	thousand cubic meters (m³), percent (%)
Energy Access			
IF-EU-240a.1	Average retail electricity rate for (1) residential, (2) commercial, and (3) industrial customers	Tariff policy, <a href="#">p. 131</a>	tariff
IF-EU-240a.3	(1) Number of residential customer electricity disconnections for non-payment; (2) percentage reconnected within 30 days	In the reporting year, the Company did not have calculation statistics	number, percent (%)
IF-EU-240a.4	Discussion of impact of external factors on customer affordability of electricity, including economic conditions in service territories		N/a
Workforce Health & Safety			
IF-EU-320a.1	(1) Total recordable incident rate (TRIR); (2) fatality rate; (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract workers	Occupational health and safety, <a href="#">p. 87</a>	rate
Grid Resiliency			
IF-EU-000.A	Number of (1) residential, (2) commercial, and (3) industrial customers	Working with consumers, <a href="#">p. 29</a>	number
IF-EU-000.B	Total electricity delivered to (1) residential, (2) commercial, (3) industrial, (4) all other retail, and (5) wholesale customers	Production activities, <a href="#">p. 26-28</a>	MWh
IF-EU-000.C	Length of transmission lines	Capacities, <a href="#">p. 15</a>	kilometers
IF-EU-000.E	Total wholesale electricity purchased	Electric energy purchase and sale operations, <a href="#">p. 28</a>	MWh

# APPENDIX 5. TCFD INDICATORS TABLE

Indicator	Report Sections
Governance	
a. Describe the board's oversight of climate-related risks and opportunities.	Climate change, <a href="#">p. 72-73</a>
b. Describe management's role in assessing and managing climate-related risks and opportunities.	Climate change risk management, <a href="#">p. 79</a>
Metrics and Targets	
a. Describe the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Climate change metrics and targets, <a href="#">p. 82-83</a>
c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against these targets.	Climate change metrics and targets, <a href="#">p. 82</a>
b. Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Climate change metrics and targets, <a href="#">p. 83</a>
Strategy	
b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Climate change strategy, <a href="#">p. 74</a>
Risk Management	
a. Describe the organization's processes for identifying and assessing climate-related risks.	Climate change risk management, <a href="#">p. 79-81</a>
b. Describe the organization's processes for managing climate-related risks.	Climate change risk management, <a href="#">p. 79</a>
c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Climate change risk management, <a href="#">p. 79</a>



# APPENDIX 6. FINANCIAL REPORTING

The risk register of KEGOC JSC for 2024, approved by the Board of Directors, includes the risk of “Misstatement in financial reporting,” which is not considered significant and is classified in the “green zone” of KEGOC JSC’s risk map. During the preparation of the Group’s consolidated financial statements for 2024, this risk did not materialize.

To mitigate the risk of misstatements in the Group’s financial reporting, the following preventive measures are carried out on an ongoing basis:

- ◆ staff training;
- ◆ monitoring of the legal information database;
- ◆ audit of financial statements by an independent audit firm;
- ◆ multi-level control over data entry into the accounting system;
- ◆ control over the accuracy of primary data provided by KEGOC JSC’s structural units and subsidiary.

In addition, during the audit of the financial statements, the independent audit firm:

- ◆ identifies and assesses the risks of material misstatement in the consolidated financial statements due to fraud or error;
- ◆ designs and performs audit procedures responsive to those risks;
- ◆ examines the internal control systems to develop appropriate audit procedures;
- ◆ evaluates the appropriateness of the accounting policies applied and the reasonableness of accounting estimates and disclosures made by management;
- ◆ concludes on the appropriateness of management’s use of the going concern assumption;
- ◆ assesses the overall presentation of the consolidated financial statements, including structure, content, and whether the underlying transactions and events are presented fairly;
- ◆ obtains sufficient and appropriate audit evidence regarding the financial information of the Company to express an opinion on the consolidated financial statements.

The selection of the audit firm to perform the financial statement audit for the KEGOC JSC Group was conducted in accordance with Appendix No. 13 of the Procurement Rules of Samruk-Kazyna Sovereign Wealth Fund JSC and legal entities in which fifty percent or more of voting shares (equity interest) are directly or indirectly owned by Samruk-Kazyna JSC, approved by the decision of the Samruk-Kazyna JSC Board of Directors on March 3, 2022, No. 193.

As a result of the selection process, a contract was signed with RSM Qazaqstan LLP, an independent audit firm and a member of the Chamber of Auditors of the Republic of Kazakhstan. The fee for the audit services rendered in 2024 amounted to KZT 45.855 million, including VAT.

To maintain independence and in accordance with the External Audit Policy of KEGOC JSC, a rotation of the audit partner is carried out every five consecutive years if the audit is conducted by the same firm. RSM Qazaqstan LLP has been auditing the financial statements of KEGOC Group since 2021.

No non-audit services were provided by RSM Qazaqstan LLP to KEGOC JSC in 2024.

Details of the consolidated financial statements for the year ended 31 December 2024 can be found at the link: <https://www.kegoc.kz/upload/iblock/eba/svtyqcsnzsw5go3l32pkqvkmxd8bacbl.pdf>

Details of the management’s commentary on the financial results of operations as of and for a year ended 31 December 2024 can be found at the link: <https://www.kegoc.kz/upload/iblock/b67/0einpki0x3l1w0zriijddjf9ryk7d68e.pdf>

# APPENDIX 7.

## INDEPENDENT LIMITED ASSURANCE REPORT



### Independent practitioner's limited assurance report on “KEGOC” JSC's Selected consolidated sustainability information

To the Board of Directors of “KEGOC” JSC

#### Limited assurance conclusion

We have conducted a limited assurance engagement on the selected consolidated sustainability information of “KEGOC” JSC (hereinafter the “Company”) and its subsidiary “Energoinform” JSC (hereinafter – the “Group”) that is disclosed in the Annual Report and is summarized in the Appendix 1 to this report (hereinafter – the “Selected consolidated sustainability information” and the “Annual Report” respectively) as at 31 December 2024 and for the year then ended.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected consolidated sustainability information is not prepared, in all material respects, in accordance with the GRI Sustainability Reporting Standards published by the Global Reporting Initiative (GRI) (hereinafter – the “GRI Standards”).

#### Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information (“ISAE 3000 (Revised)”), issued by the International Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

#### Our independence and quality management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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#### Responsibilities for the Selected consolidated sustainability information

Management of the Company is responsible for:

- The preparation of the Selected consolidated sustainability information in accordance with GRI Standards;
- Designing, implementing and maintaining such internal control as Management of the Company determines is necessary to enable the preparation of the Selected consolidated sustainability information, in accordance with GRI Standards, that is free from material misstatement, whether due to fraud or error; and
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Board of Directors are responsible for overseeing the Group's sustainability reporting process.

#### Inherent limitations in preparing the Selected consolidated sustainability information

Under the GRI Standards there is a range of different, but acceptable, measurement and reporting techniques. The techniques can result in materially different reporting outcomes that may affect comparability with other organisations. The Selected consolidated sustainability information should therefore be read in conjunction with the methodology used by Management of the Company as described in the Annual Report, and for which the Company is solely responsible.

#### Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Selected consolidated sustainability information is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Selected consolidated sustainability information.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Determine the suitability in the circumstances of the Group's use of GRI Standards as the basis for the preparation of the Selected consolidated sustainability information.
- Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Design and perform procedures responsive to where material misstatements are likely to arise in the Selected consolidated sustainability information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

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Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Selected consolidated sustainability information. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of where material misstatements are likely to arise in the Selected consolidated sustainability information, whether due to fraud or error.

In conducting our limited assurance engagement, we:

- Obtained an understanding of the Group’s reporting processes relevant to the preparation of its Selected consolidated sustainability information;
- Performed inquiries of relevant personnel on the Selected consolidated sustainability information;
- Conducted limited substantive testing on a sample basis on a Selected consolidated sustainability information to verify that the data have been properly calculated, recorded, compared and disclosed.

Restriction on distribution and use

Our report has been prepared solely for the Board of Directors of the Company in accordance with the agreement between us, to assist the Management of the Company in reporting on the Group’s sustainability performance and activities and in responding to their governance responsibilities by obtaining an independent limited assurance report in connection with the Selected consolidated sustainability information. The Selected consolidated sustainability information therefore may not be suitable, and is not to be used, for any other purpose.

We permit this report to be disclosed in the Annual Report, which will be published on the Group’s website.

The maintenance and integrity of the Group’s website is the responsibility of Management of the Company; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected consolidated sustainability information when presented on the Group’s website.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work or this report except where the respective terms are expressly agreed in writing and our prior consent in writing is obtained.

PricewaterhouseCoopers Tax & Advisory LLP

30 May 2025  
Almaty, Kazakhstan



Appendix 1 to the Independent practitioner’s limited assurance report dated 30 May 2025

The Selected consolidated sustainability information for the year ended 31 December 2024 and for the year then ended disclosed pages 54- 195 of the Annual Report and prepared in accordance with the GRI Standards and subject to limited assurance procedures are set out below:

GRI Standard	Reported Performance (Selected consolidated sustainability information)	Pages
205-3	Confirmed incidents of corruption and actions taken	p. 124-125, 162, 171
302-1	Energy consumption within the organization	p. 68-69,163,172
303-3	Water withdrawal	p. 66, 173
303-4	Water discharge	p. 66, 173
303-5	Water consumption	p. 66, 173
305-1	Direct (Scope 1) GHG emissions	p. 85-86, 174
305-2	Energy indirect (Scope 2) GHG emissions	p. 85-86, 174
305-4	GHG emissions intensity	p. 85-87,174
305-5	Reduction of GHG emissions	p. 71,85,88,174
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	p.65,175
306-3	Waste generated	p. 67, 176
306-4	Waste diverted from disposal	p. 67, 176
306-5	Waste directed to disposal	p. 67, 176
403-9	Work-related injuries	p. 91-92,165,178
403-10	Work-related ill health	p. 90-91,178
405-2	Ratio of basic salary and remuneration of women to men	p. 54, 178
406-1	Incidents of discrimination and corrective actions taken	p.124, 178

# GLOSSARY

	Definition
AC	Audit Committee of the Board of Directors of KEGOC JSC
AFPC	Automatic frequency and power control
ALE	Association of Legal Entities
AMP	Administrative and management personnel
ARV	Automatic excitation regulation
BioPP	Bioelectric power plants
Branches	KEGOC JSC branches MES and NDC SO
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CHPP	Combined Heat and Power Plant
CIS	Commonwealth of Independent States
CIW	Construction and Installation Works
Company	KEGOC JSC
COSO ERM	COSO Enterprise Risk Management
CRMS	Corporate Risk Management System
DED	Design and Estimate Documentation
EBITDA	Earnings Before Interest, Taxes, Depreciation and Amortization
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
ES	Emergency Situation
FOCL	Fiber-optic communication line
FS	Feasibility Study
GRES	State district power plant
GRI	Global Reporting Initiative

	Definition
GTPP	Gas-turbine power plant
HPP	Hydro power plant
IAS	Internal Audit Services
ICS	Internal Control System
IFI	International Financial Institutions
IFRS	International Financial Reporting Standards
IMS	Integrated Management System
IPO	Initial Public Offering
IRD	Internal regulatory document
IS	Information Security
ISMS	Information Security Management System
ISO	International Organization for Standardization
JSC	Joint Stock Company
KASE	Kazakhstan Stock Exchange
KEGOC JSC	Kazakhstan Electricity Grid Operating Company
KPI	Key performance indicators
kV	kiloVolt
kWh	Kilowatt-hour
LLP	Limited Liability Partnership
LTIFR	Lost Time Injury Frequency Rate
MES	Interconnection Electric Networks, KEGOC Branches
MVA	Megavolt-ampere
MW	Megawatt
NAV	Net Asset Value



	Definition
NDC SO	National Dispatch Centre of the System Operator
NPG	National Power Grid
NRC	Nomination and Remuneration Committee
OHTL	Overhead transmission lines
OSHSEC	Occupational Safety, Health and Environmental Committee
PCB	Polychlorinated Biphenyl
PP	Production personnel
PTL	Power Transmission Line
R&D	Research and Development
RDC	Regional Dispatch Centre
RES	Renewable energy sources
CRMS	Corporate Risk Management System
ROACE	Return on Average Capital Employed

	Definition
Samruk-Kazyna JSC	Sovereign Wealth Fund Samruk Kazyna Joint Stock Company
SAP	System Applications and Products
SCADA	Supervisory Control and Data Acquisition
SFCS of RES LLP	Settlement and Financial Center for Support of Renewable Energy Sources
SPO	Secondary Public Offering
SPP	Solar Power Plant
TPP	Thermal Power Plant
UN	United Nations
UPS	Unified Power System
VAT	Value Added Tax
WAMS/WACS	Wide Area Management System and Control
WPP	Wind power plant



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