



**TENGIZCHEVROIL /ТЕНГИЗШЕВРОЙЛ**

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## **EXECUTIVE NOTE**

This Stakeholder Engagement Plan (SEP) applies to TCO base business and major capital projects such as the Future Growth Project and the Wellhead Pressure Management Project (FGP-WPMP). It is a living document endorsed by the TCO Leadership Team. It contains the actions that specify with whom TCO engages, and how TCO undertakes to meet the strategic objectives outlined in the SEP. The SEP is updated on an annual basis, or more frequently as circumstances dictate. It supports Stakeholder Engagement Execution Plans that relate to managing key project environmental and social issues.

**0.1 ACTION: SEP Commitment.** TCO Management Team endorses the plan.

This TCO SEP aligns with the TCO's strategic business objectives and Business Principles ("the TCO Way"), Chevron's Stakeholder Engagement Corporate OE Process and related policies, and the IFC Performance Standards and Equator Principles III.

All actions from this SEP are collated in **Appendix 1 (Engagement Action Plan)**.

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## **ABBREVIATIONS**

<b>CAC</b>	– Community Advisory Council
<b>CaTRo</b>	– Cargo Transportation Route
<b>CIP</b>	– Community Investment Program
<b>CLO</b>	– Community Liaison Officer
<b>DGM</b>	– Deputy General Manager PGPA
<b>EGILIK</b>	– Social Investment “Benefit” Program
<b>EIA</b>	– Environmental Impact Assessment
<b>EP</b>	– Equator Principles
<b>ELCMP</b>	– Environment, Labour, Community Management Plan
<b>EPFI</b>	– Equator Principle Financial Institutions
<b>EPP</b>	– Environmental Protection Plan
<b>ESHIA</b>	– Environmental, Social and Health (Integrated) Impact Assessment
<b>FGP</b>	– Future Growth Project
<b>GM</b>	– Grievance Mechanism
<b>HES</b>	– Health, Environment, and Safety
<b>IFC</b>	– International Finance Corporation
<b>IFC-PS</b>	– IFC Social and Environmental Performance Standards
<b>KC</b>	– Kazakhstani Content
<b>NGO</b>	– Non-Governmental Organisation
<b>OEMS</b>	– Operational Excellence Management System
<b>PGPA</b>	– Policy, Government and Public Affairs
<b>RoK</b>	– Republic of Kazakhstan
<b>SEMS</b>	– Stakeholder Engagement Management System
<b>SEP</b>	– Stakeholder Engagement Plan
<b>SI</b>	– Social Investment
<b>SPZ</b>	– Special Protection Zone
<b>TCO</b>	– Tengizchevroil
<b>WPMP</b>	– Well Pressure Management Project



## 1.0 INTRODUCTION

### 1.1 Plan Purpose and Scope

The Tengizchevroil LLP (TCO) Stakeholder Engagement Plan (SEP) provides the framework for external stakeholder engagement for TCO base business operations and major capital projects such as the Future Growth Project and the Wellhead Pressure Management Project (FGP-WPMP).<sup>1</sup> It is aligned with national (Republican) regulatory standards, the requirements of Equator Principle Financial Institutions (EPFI), in particular IFC Performance Standard 1 and the Equator Principles III, Chevron's Operational Excellence Management System (OEMS) and existing TCO communications and engagement systems.

The SEP establishes the actions required to expand and formalize engagement practices to meet the needs of TCO and the FGP-WPMP, including EIA (Environmental Impact Assessment) and ESHIA (Environment Health Social Impact Assessment) implementation, Social Investment (SI) programming, grievance management (GM) and day-to-day engagement with stakeholders. It sets out the actions to formalize the engagement process and establishes the framework for implementation. The objectives of this SEP are to:

- Set out the strategic plan for stakeholder engagement that meets international standards and ensures regular, accessible and transparent consultation with stakeholders and that defines the roles, responsibilities and resources necessary to implement the SEP, including the procedures to monitor and follow up on stakeholder feedback and grievances;
- Provide a framework for stakeholder identification (including vulnerable groups) and analysis; consultation and engagement activities; risk and issue identification; information sharing; and the documentation of engagement activities and the required follow-up action;
- Provide the basis for building constructive, long-term relationships with stakeholders, based on dialogue and two-way communication to build trust and limit business interruption; and
- Assist TCO to understand stakeholder expectations regarding TCO and the FGP-WPMP and facilitate stakeholder input into impact assessments and the development of suitable mitigation measures for major capital projects.

Stakeholder perceptions, expectations and attitudes documented as part of ongoing engagement and the EIA/ESHIA process are incorporated into the forward planning for engagement activities, set out in **Section 9**. Lessons learned from TCO's historical engagements, related to TCO Base Business, are also incorporated into the engagement planning process. The SEP will be implemented through specific Engagement Execution Plans and a related Communication Plan that detail how TCO manages, engages and communicates on specific issues.

This SEP will be reviewed on an ongoing basis and updated to reflect information obtained during stakeholder engagement, project activities and/or changes in stakeholder perceptions, priorities and concerns. It links with the following documents and plans: the ESHIA; the Social Investment Plan; the Egilik; the Communications Strategy; the FGP-WPMP Environment Labor and Community Management Plan (ELCMP), the Contractor Management Plan, and the FGP-WPMP Biodiversity Action Plan.

### 1.2 Structure of the SEP

Early and ongoing stakeholder engagement is critical to the success of TCO and the FGP-WPMP. This SEP provides details on the objectives of stakeholder engagement, identifying key stakeholders and setting out the approach and responsibility for engagement along with relevant engagement tools. It is structured as follows, with specific actions defined to implement the intent of each of the sections:

- **Section 1:** Plan, Purpose and Scope; Background and Project Description

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<sup>1</sup> At time of writing the FGP-WPMP had not received Final Investment Decision (FID).

- **Section 2: Stakeholder Engagement Principles:** Sets out TCO's engagement strategy and principles
- **Section 3: Stakeholder Engagement Requirements:** Provides an overview of Republic of Kazakhstan engagement requirements as well as IFC, Equator Principles and Chevron engagement standards
- **Section 4: Organization, Roles and Responsibilities:** Provides an overview of the organization, roles and responsibilities within TCO supporting stakeholder engagement
- **Section 5: Key Stakeholders:** Identifies TCO's main stakeholders
- **Section 6: Existing Engagement Activities:** Provides a summary of engagement activities to date
- **Section 7: Approach, Methods and Tools:** Outlines TCO's approach to engagement, including monitoring and stakeholder tracking and issues identification
- **Section 8: Grievance Mechanism:** Outlines TCO's grievance mechanism and the process to respond to / address stakeholder feedback and concerns
- **Section 9: Future Engagement Activities:** Sets out TCO's plan for ongoing stakeholder engagement and the forward Action Plan on implementation of the SEP.

### 1.3 Background and Project Description

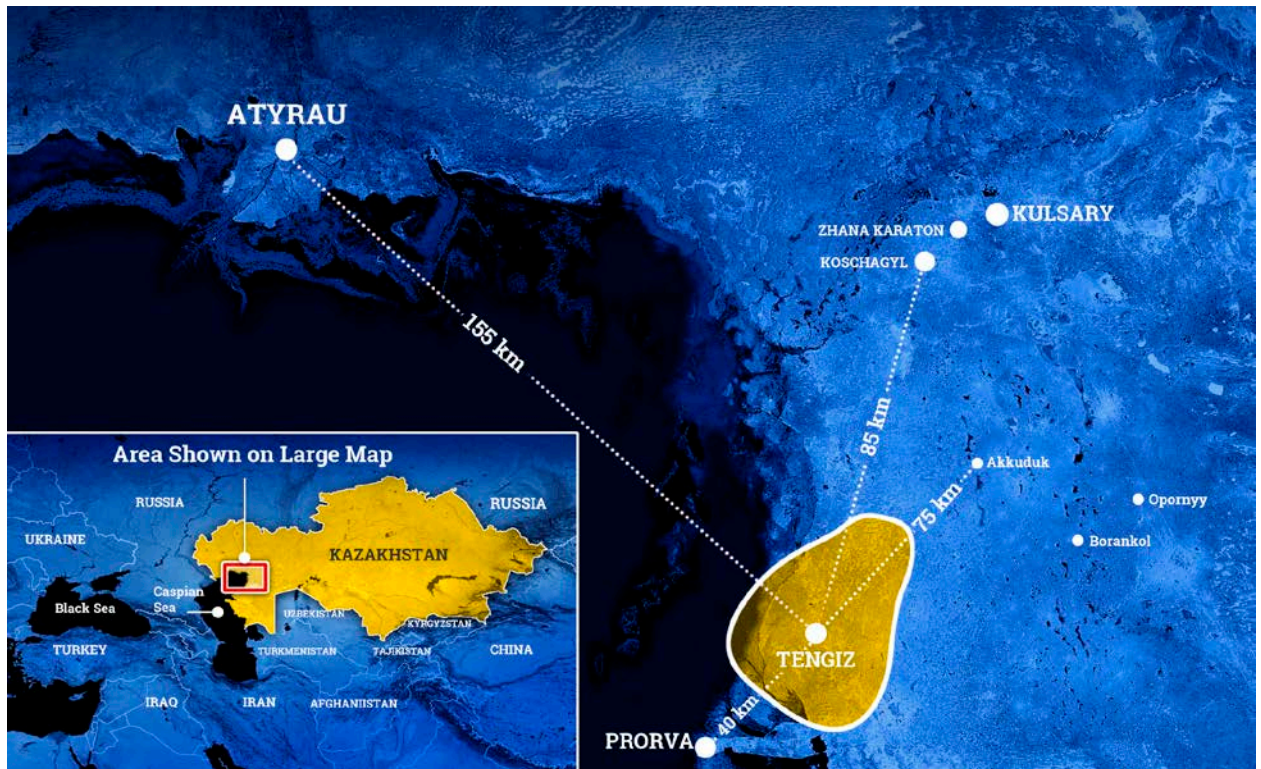
Formed in 1993 between the Republic of Kazakhstan and Chevron Corporation, TCO is a Kazakhstani partnership that explores, develops, produces and markets crude oil, LPG, dry gas and sulfur; current partners are: Chevron (50%); NC KazMunaiGas JSC (20%); ExxonMobil Kazakhstan Ventures Inc., (25%); and LukArco (5%).

The Tengiz field is an oil field in Northwestern Kazakhstan's low-lying wetlands on the shores of the Caspian Sea (see **Map 1.1**). It is the largest operational oil field in Kazakhstan and covers a 2,500 km<sup>2</sup> (970 sq mi) project license area, which also includes the smaller Korolev Field, along with several exploration prospects. Discovered in 1979, the Tengiz oil field is one of the largest discoveries in recent history and is one of the world's deepest producing super giant fields. Crude oil production for 2014 was 26.7 million metric tonnes (213 million barrels).

TCO currently has 13 Major Capital Projects. The largest are the Future Growth Project and Wellhead Pressure Management Project, which are two integrated projects that are being executed simultaneously. FGP-WPMP would increase crude oil production capacity by approximately 12 million tonnes per year, raising TCO's total production to about 38 million tonnes per year. FGP-WPMP consists of production wells, a facility for oil and gas processing, and a sour gas injection facility. While FGP would expand production, the Wellhead Pressure Management Project (WPMP) will keep the existing Tengiz plants at full current production, by lowering the flowing wellhead pressure in the field and using a central pressure boost facility to boost the incoming production to the inlet pressure at the plants. Execution basis for FGP-WPMP is a modularized concept with pre-assemblies and modules to be built in Kazakhstani and overseas yards, and then transported to Tengiz for final assembly and hook-up.

FGP-WPMP scopes include module fabrication yards; in-Field Haul Roads; module transport through shipping channels and the Russian Inland Waterway System (RIWS), trans-shipment points and the creation of the Cargo Transportation Route (CaTRo) in the Caspian; supporting infrastructure; a Construction Compound; access roads, railway lines and sidings; and accommodation camps, power generation, water supply and waste disposal facilities. FGP-WPMP was designed with the objective of providing for the proper stewardship of the resources of the Republic of Kazakhstan. In using appropriate reservoir management principles and approaches, TCO will be able to increase crude oil recovery and so prolong the life of the Tengiz reservoir. In addition, FGP design will avoid the production of sulfur by reinjecting associated gas.

**Map 1.1: Tengiz Field**



## 1.4 Social Setting

The Tengiz oil field is in a relatively remote and sparsely populated area of Atyrau Oblast (see **Map 1.1**). The Joint Venture Key Project Area (JV KPA) includes parts of Zhylyoi District, which is a subdivision of Atyrau Oblast. The majority of people in Zhylyoi District reside in Kulsary, the administrative center of the District. The Social spatial scope includes the following settlements and outlying farms:

- Kulsary city, Zhylyoi administrative centre (90 km from TCO site)
- Zhana Karaton village (80 km from TCO site)
- Koschagyl village and wintering farms (70 km from TCO site)
- Wintering farms in Maikomgen rural district (70 km from TCO site)
- Wintering farms in Akkuduk (40 km from TCO site)
- Opporny (70 km from TCO site); and
- Borankul (60 km from TCO site).

*Note: The wintering farms are occupied from November-March by families and their livestock.*

**Estimated Population of Relevant Parts of Zhylyoi - JV Area KPA**

Administrative unit	2007/8	2012
Zhylyoi District	71,094	75,300
Kulsary city	51,111	54,582
Koschagyl rural district	4,495	4,688
Zhana Karaton rural district	-	6,535
Maikomgen rural district	1,592	1,514

Source: ERM ESHIA

The main FGP-WPMP KPAs (Key Project Areas) include the Cargo Offloading Facility (COF), the construction and use of a 14-kilometre causeway linking the COF to the onshore facilities in the KPA, and

the construction and use of a cargo storage facility (CSF) to store modules prior to transport to the project area. The COF will occupy 16.8 hectare and be located at Prorva point and be used for the unloading and temporary storage point for modules transported via the Marine Access Channel. These KPAs are remote and sparsely populated. Further south, in Mangistau Oblast, pre-assembled pipe rack modules for the FGP-WPMP will be fabricated at existing yards in Aktau City (population 180,400), yards which will be upgraded prior to work commencing. The FGP-WPMP also assumes the transport of materials using the existing rail line and rail siding at Opornyy, the use of Bautino port for activities associated with dredging of the Marine Access Channel and the use of waste management facilities selected using TCO's third party waste stewardship process. A map of the KPAs is provided in **Map 1.2.a** while **Map 1.2.b** depicts the main road and rail lines being used by TCO base business and to be used by the FGP-WPMP.

**Map 1.2 a: FGP Footprint**



**Map 1.2.b: Prorva-Tengiz-Atyrau Rail and Road Links**





## 2.0 STAKEHOLDER ENGAGEMENT PRINCIPLES

The foundation for TCO's approach to stakeholder engagement is effective, timely and meaningful consultation and communication, based on mutually acceptable engagement procedures, transparency and trust. TCO intends to undertake stakeholder engagement that delivers inclusive and ongoing dialogue between TCO and its stakeholders using a diversity of approaches to achieve meaningful engagement.

In accordance with TCO's Strategic Intent, international practice (e.g. Equator Principles, IFC Performance Standards) and Chevron's OEMS, the SEP has been designed for transparent, inclusive, respectful, culturally appropriate, and accountable engagement that will assist in meeting TCO business objectives. TCO's Engagement Principles are as follows:

- Engagement is free, prior and informed and free of manipulation, interference, coercion and intimidation;
- The engagement process is: explained to stakeholders with engagements undertaken early so that views expressed can be taken into account; focused on issues of importance to TCO and the stakeholders; carried out in a culturally appropriate manner; conducted in a timely manner that provides relevant, and accessible project information that is disclosed on a consistent, transparent basis; based on a two-way dialogue; and
- Grievances are responded to promptly and transparently.

This SEP and its objectives and principles will be reviewed by TCO senior management on an annual basis, with periodic evaluations of the disclosure and engagement approach, particularly throughout the life-cycle of TCO's Major Capital Projects.

**2.1 ACTION: Annual SEP Review.** TCO senior management reviews the SEP annually.

## 3.0 STAKEHOLDER ENGAGEMENT REQUIREMENTS

### 3.1 National Standards for Stakeholder Engagement

The activities outlined in this SEP comply with the requirements set out in the legislation of the Republic of Kazakhstan (RoK), in particular: *Law No 212-III of 9 January 2007 (the Environmental Code)*; the *Rules on Public Hearings (Order of 7 May 2007, No 135 on approval of rules for public hearings – replaced by Order of 26 March 2013, No. 50-p)*; *Order RK No.204-p of 28 June 2007 on EIA*; and *Order RK No.607-p of 3 June 2014 (Rules on Access to Environmental Information Relevant to the EIA Procedure and Decision-Making Process on Proposed Economical and Other Activities)*. Kazakhstan has also ratified the *Aarhus Convention on Public Participation*<sup>2</sup> and the *Espoo Convention on Trans-boundary EIA*.<sup>3</sup>

Public engagement is mandatory for the approval of development projects during the Republic of Kazakhstan EIA process. The scale of public consultation and participation in decision-making is dependent on the nature and scale of the proposed project and degree of public interest. Public Hearings are carried out at each phase of the permitting process with the affected communities in the permit-issuing oblast (region). Prior to the Public Hearings, the proponent must inform the public about the project and disclose relevant information. The process involves publication of regulatory documentation (online and in public places, with announcements in the media), public meetings (announced in the media and open to the public) that include presentations of the particular development project (e.g. project description, transport routes, management plans, the regulatory process, next steps etc.).

<sup>2</sup> Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters of 28 June 1998. On 23 October 2000 Kazakhstan ratified the Aarhus Convention.

<sup>3</sup> Convention on EIA in a Trans-boundary Context of 1991, and the 2003 Protocol on Strategic Environmental Assessment. The Espoo Convention entered into force on 10 September 1997 and was acceded to by Kazakhstan on 11 January 2001. Kazakhstan is not a signatory to the SEA Protocol.

At the Public Hearings, participants have an opportunity to ask/submit questions and make public comments. Prior to Public Hearings, TCO voluntarily holds community round tables for Aksakals (elders), NGOs and community leaders in Atyrau and Kulsary to discuss the project or undertaking at hand and if, and how, TCO has met the provisions noted above. The proponent must also provide access to the EIA for review, and advertise the date of the Public Hearing at least 20 days in advance. Minutes are taken following the meetings, which include opinions and suggestions of stakeholders and the Company's responses. These minutes are provided to the State Ecological Expertise for consideration. Any stakeholder complaints need to be addressed to the appropriate authorities.

The *Aarhus Convention* requires governments to grant to the public rights regarding access to information on the environment, including information on the environmental impacts of corporate activities; public participation early in decision-making on activities that can have significant environmental impact; and access to justice. The *Espoo Convention* applies where there may be significant adverse trans-boundary impacts and requires the country from which the potential impact originates to notify the public of the affected country and to take into account comments received. As the Republic of Kazakhstan is a party to both conventions, it is expected that engagements will align with the stated intentions of each.

### **3.2 IFC Performance Standards and Equator Principles Requirements**

Since the FGP-WPMP requires project finance from EPFI, the project is subject to the IFC Performance Standards and the EP III. IFC Performance Standard 1 (*Assessment and Management of Environmental and Social Risks and Impacts*) requires clients to:

- Provide affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;
- Identify interested and affected communities and stakeholders and engage in two-way dialog with these stakeholders;
- Develop a SEP, including measures to allow for the effective participation of stakeholders identified as disadvantaged or vulnerable;
- Ensure engagement is based on the timely and effective dissemination of relevant project information to allow for meaningful communication and undertake consultation that allows affected communities to express their views on project risks, impacts and mitigation measures;
- Implement a communication procedure that includes methods to (i) receive and register public comments; (ii) screen and assess issues raised and determine how to address them; (iii) provide, track and document responses; and (iv) adjust the Environment, Labor, Community Management Plan (ELCMP);
- Ensure engagement starts early on and continues throughout the project, and includes disclosure of timely, relevant, understandable and accessible information in a culturally appropriate format;
- Allow stakeholders to participate in a meaningful way and ensure that engagement is free of external manipulation, interference, coercion or intimidation;
- Identify and engage with stakeholders that are not directly affected by the project but have established relationships with local communities and/or an interest in the Project;
- Provide periodic reports describing progress with implementation of the Environment Social Management Plan (equivalent to ELCMP) on issues involving on-going risk to, or impacts on, Affected Communities, and on issues that the consultation process or grievance mechanism has identified as being of concern.

The Equator Principles (Principle 5) state that for all major (Category A) projects there must be effective stakeholder engagement as an on-going process in a structured and culturally appropriate manner with Affected Communities and other stakeholders. For projects with potentially significant adverse impacts on Affected Communities, the client is to conduct an Informed Consultation and Participation process, similar to that required by IFC PS-1. To accomplish this, the environmental and social assessment documentation is to be made available to the public by the borrower in the relevant local language (e.g. Kazakh and Russian) and in a culturally appropriate manner.

**3.1 ACTION: Compliance:** PGPA will facilitate discussion with the relevant Subject Matter Experts (SME) and TCO departments by the end of Q1 2016 to ensure that the engagement activities described in this SEP comply with RoK legislation and the provisions of IFC PS 1 and the EP.

### 3.3 Chevron Stakeholder Engagement Standards

TCO has adopted Chevron's *Operational Excellence Management System (OEMS)*. The OEMS is a comprehensive means for systematic management of process safety, personal safety and health, the environment, reliability and efficiency. Through disciplined application of the OEMS, TCO integrates OE processes, standards, procedures and behaviors into its daily operations and, on that basis, aims to achieve world-class performance. The OEMS helps TCO/FGP-WPMP identify and manage the risks in business operations, including in relation to stakeholder engagement and relations. Corporate expectations for Operational Excellence are set out in 13 elements, each of which is systematically audited for compliance. Of particular relevance are *OE 10: Stakeholder Engagement* and *OE 13: Legislative and Regulatory Advocacy/Issue Management*. These elements are supported by additional corporate guidance to assist the practitioner in achieving effective, respectful and impactful stakeholder engagement. These include the *Stakeholder Engagement Guidelines* and the *Stakeholder Engagement – Corporate OE Process*. OE 13 was also recently revised to include the management of external stakeholder issues with the same rigor as legislative and regulatory aspects.

## 4.0 ORGANIZATION, ROLES AND RESPONSIBILITIES

### 4.1 Organization

Responsibility for this SEP rests with TCO's Policy, Government & Public Affairs (PGPA) department. PGPA is also responsible for leading or supporting the following activities:

- Stakeholder engagement across the area impacted by TCO and the FGP-WPMP
- Building stakeholder relationships and information sharing
- Social performance
- Social investment projects under the Egilik<sup>4</sup> and Community Investment Program (CIP)
- Monitoring, reporting and grievance management
- EIA/ESHIA engagement (where required)
- Corporate responsibility reporting

PGPA works closely with various Subject Matter Experts (SME) and technical departments within TCO, other organizations, and the government at all levels to implement the SEP. PGPA will review the possible need for the creation of a Community Liaison Officer function (CLO) to facilitate engagement with stakeholders on FGP-WPMP and base business matters.<sup>5</sup>

**4.1 ACTION: CLO.** PGPA will review the need for a CLO function to serve both TCO and FGP-WPMP needs.

The CLO function will meet regularly with community leaders/representatives to receive information and grievances and to engage in dialogue to explain the project and receive input and comments. The CLO function will also meet with potentially affected communities to consult on ways to avoid or reduce potential community impacts. Moreover, the CLO function will inform potentially affected communities prior to the commencement of works of the nature and extent to which the communities may be affected.

### 4.2 Roles and Responsibilities

PGPA has overall responsibility for all stakeholder engagement undertaken for TCO and capital projects such as FGP-WPMP, but SE activities will be conducted across the company depending on the stakeholder and the issue. Within PGPA, the Deputy General Manager, Policy, Government & Public Affairs, with the support of the SE Coordinator and the CLO function, has overall responsibility of the SEP. The SEP is premised on the provision of timely, accessible, understandable and appropriate information to interested and affected stakeholders, so interested and affected stakeholders have the opportunity to express their views and comments and receive a timely response to their queries. To this end, the CLO function will develop engagement plans for key community and stakeholder groups, outlining how many meetings are envisaged, with whom, with which frequency (depending on the issue this may be weekly, monthly or annually) as well as what information tools will be developed and used.

The following positions will have a direct involvement in implementing the SEP:

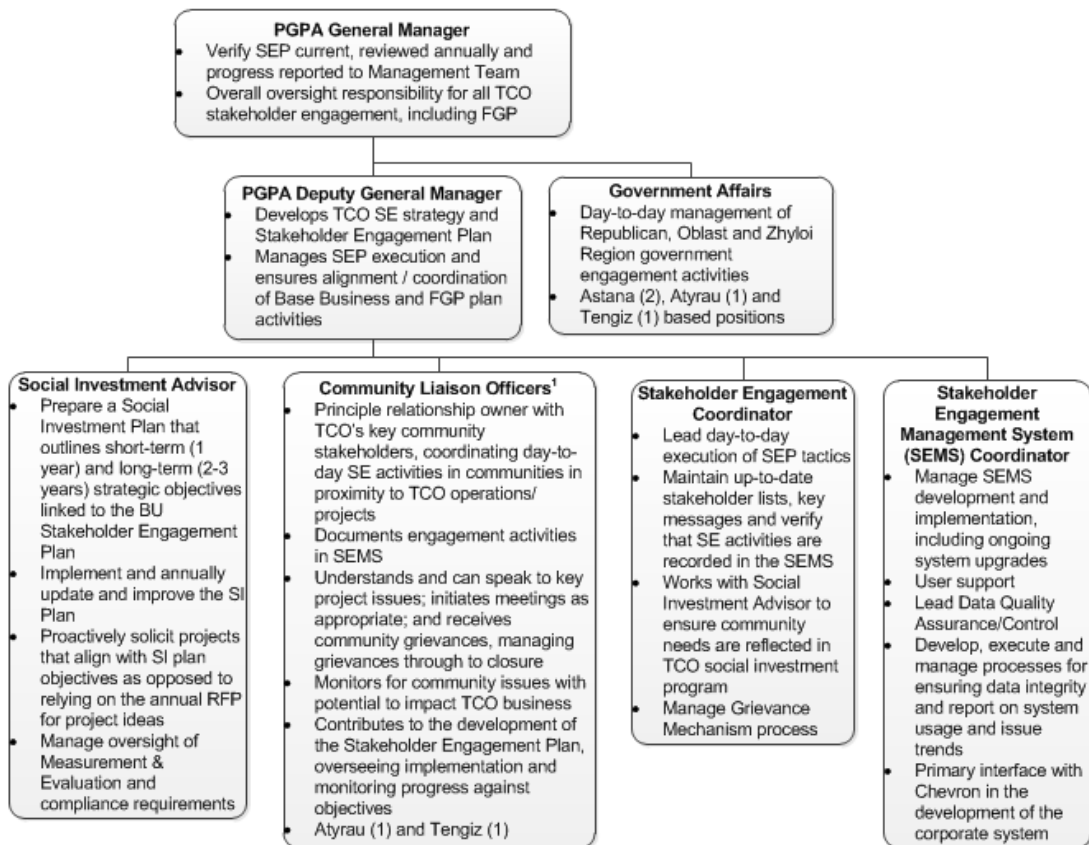
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<sup>4</sup> Projects are developed in consultation and negotiation with the Atyrau Oblast government. The Egilik Program, a social infrastructure development program is a shared responsibility with PGPA and TCO's Projects department.

<sup>5</sup> The size and composition of the CLO team will be determined by the size and number of the communities involved as well as the nature of the extent of issues.



**Figure 4.1: PGPA Stakeholder Engagement Function**



As of 13 November 2015

<sup>1</sup> Proposed positions

### 4.3 Contractor Responsibilities

Contractors will be required to work with government departments and agencies to obtain all licenses and permits for the specific aspect of a Major Capital Project (MCP) for which they have been contracted by TCO. Using the Cargo Transportation Route (CaTRo) as an example, TenizService LLP is building the CaTRo for TCO and, as such, is responsible for obtaining all permitting and other necessary approvals for the project. TCO's role is to provide oversight of TenizService.

Contractors will be responsible for satisfying any terms and conditions imposed by the appropriate government authorities, whether those be prior to or after having obtained the licenses/permits. Contractors will not conduct stakeholder engagement activities with communities or non-governmental organizations unless required to do so as part of the license/permit approval process.

Engagement activities with communities and non-governmental organizations for an aspect of an MCP will be undertaken by TCO.

### 5.0 KEY TCO STAKEHOLDERS

For the purpose of this SEP, stakeholders are defined as individuals or groups who can affect, are affected by or have a legitimate interest in the company's performance. Stakeholders can include, but are not limited to: government officials, communities, NGOs, media, contractors, business organizations and legislative and regulatory authorities.

Different issues are likely to concern different stakeholders, and so different (though overlapping) types of stakeholders have been grouped based on their interest in/connection to TCO-FGP-WPMP. Each of these groups is briefly discussed in **Section 6**.

TCO maintains a master stakeholder list and updates it on an ongoing basis. **Box 5.1** provides a list of strategic TCO stakeholder groups. A more complete list of individual stakeholders, details for which can be found in TCO's Stakeholder Engagement Management System (SEMS) database, is provided in **Appendix 2**.

**Box 5.1: TCO Strategic Stakeholder Groups**

- TCO employees
- National government including Ministries of Energy, Environment, Finance, Labor, Investment and Development, and committees
- Regional governments including Atyrau and Mangistau Oblasts and Zhylyoi District
- Local governments including Atyrau, Kulsary and Aktau
- Community members including Aksakals (elders)
- Businesses individually and through associations
- Civil Society and NGOs
- Kazakh Academia (Nazarbayev University, Kazakh-British Technical University), foreign universities with expertise in Caspian issues such as Leeds and St. Andrews Universities)<sup>6</sup>
- Local, national and international media
- Contractors, sub-contractors

Relations with these stakeholders are important. While TCO has had several expansion and improvement projects over the past 20 years, stakeholder groups have remained relatively constant.

To define stakeholder relationships, their importance to TCO Base Business and/or FGP-WPMP and stakeholder influence on TCO's operations, stakeholders are assessed according to influence, interest and the degree of impact. The objective is to improve the efficiency and effectiveness of engagement, and to identify any potential risks and issues that TCO or the FGP-WPMP may face. This approach also helps TCO understand stakeholder issues, set priorities, and decide on specific techniques for achieving effective stakeholder participation.

The matrix below helps determine which stakeholders are the most important to consider. Alignment on the vertical axis indicates the degree to which the stakeholder's interests are the same as, or similar to, those of TCO. Influence, along the horizontal axis, refers to the relative ability of the stakeholder to affect TCO and/or FGP-WPMP operations. Primary stakeholders who require engagement to ensure alignment are those who would be listed in the red and yellow squares (grids C1, C2, B1 and B2 in priority order). Stakeholders who already support the project (C3) are important to identify due to their level of influence. All others are considered as incidental to the project as they are either already aligned with TCO's objectives, or their ability to influence our project objectives is minimal.

**Figure 5.1: Stakeholder Prioritization Matrix**

<b>ALIGNMENT</b>	<b>HIGH – 3</b>			<b>C3</b>
	<b>MEDIUM – 2</b>		<b>B2</b>	<b>C2</b>
	<b>LOW – 1</b>		<b>B1</b>	<b>C1</b>
		<b>A LOW</b>	<b>B MEDIUM</b>	<b>C HIGH</b>
		<b>INFLUENCE</b>		

<sup>6</sup> The international universities are included due to their expertise in Caspian and marine environmental issues.

After prioritizing stakeholders, the information is used to determine the degree to which TCO will interact with each stakeholder. **Table 5.1 (Stakeholder Interaction Matrix)** helps define the appropriate level of engagement with different stakeholder groups.

**Table 5.1: Stakeholder Interaction Matrix**

Level	Purpose	Approach	Tools to Consider
<b>Monitor</b>	Maintain understanding of stakeholder position relating to the project and TCOs objectives	Monitor stakeholder statements and activities via media monitoring and other, primarily passive, means	<ul style="list-style-type: none"> <li>• Social media</li> <li>• Commercial media</li> <li>• Web-based research</li> </ul>
<b>Inform</b>	Provide stakeholders with information that helps them understand the project and TCO's point-of-view, position or action on an issue	Maintain appropriate communications from TCO to the stakeholder	<ul style="list-style-type: none"> <li>• One-on-one meetings</li> <li>• Community meetings</li> <li>• Company publications, media releases web features</li> </ul>
<b>Consult / Involve</b>	Seek feedback from stakeholder or work with them to ensure stakeholders and TCO's respective interests and points of view are understood.	Maintain two-way communication between TCO and the stakeholder that provides and acts on feedback	<ul style="list-style-type: none"> <li>• One-on-one meetings</li> <li>• Public presentations</li> <li>• Open Houses/Community meetings</li> <li>• Events and consultation meetings</li> <li>• Formal dialogues</li> </ul>
<b>Engage / Support</b>	Collaboration between TCO and stakeholder to achieve common objectives	Actively seek out options on TCO's objectives and be prepared to act on the advice and recommendations of the stakeholder	<ul style="list-style-type: none"> <li>• Advisory committees</li> <li>• Review panels</li> <li>• Working Groups</li> <li>• Collaborative meetings</li> <li>• Collaborative partnerships e.g. funding community programs and environmental/science initiatives</li> </ul>

However, there is an ongoing need to maintain an updated list of individual stakeholders as the FGP-WPMP evolves. Regular outreach to stakeholders is needed to identify additional interested parties, identify any potential gaps in coverage and to update the list.

**5.1 ACTION: Stakeholder Identification.** PGPA will update and refine the stakeholder list twice annually.

## 6.0 EXISTING ENGAGEMENT ACTIVITIES

### 6.1 Introduction

TCO engages stakeholders through structured, ongoing dialogue, both proactively and as required by law. Alongside consultation with TCO's main stakeholder, the Kazakh government (at local, regional and national level), TCO engages with NGOs, community groups, including Aksakals (elders), established advisory groups such the Community Advisory Councils (CACs), and the business community (directly with individual companies, through the Expert Group Roundtable, and through industry associations).

Going forward, this stakeholder engagement plan serves as the basis for the combined TCO and FGP-WPMP engagement framework. A forward-looking engagement plan has been developed covering both TCO and the FGP-WPMP (**Section 9**), supported by an Action Plan, set out in **Appendix 1**. The initial focus of the Action Plan is on the FGP-WPMP construction period through to operations and eventual decommissioning. It is anticipated that the focus of the Action Plan will change from year to year as the FGP-WPMP passes from construction to operations.

## 6.2 Engaging Government

The most influential stakeholder in Kazakhstan – domestic or foreign – is government. Government authorities are defined as those agencies of the Kazakh government who have the power to regulate or otherwise influence TCO in terms of establishing policy, granting permits or other approvals for TCO operations and capital projects, and monitoring and enforcing compliance with RoK Law. The government is engaged with, or at least informed at one or more levels on all issues regarding TCO and the FGP-WPMP. This level of engagement enables TCO and government to maintain an on-going dialogue, disseminate relevant information on both sides and work to resolve issues. The Kazakh government, moreover, expects to be involved in engagement activities relating to local communities and other relevant stakeholders.

At the Republican (national) level, TCO senior management engages on an ongoing basis with the government, in particular the Ministry of Energy, Ministry of Investment and Development and related Committees. Meetings are focused on the sharing of project information; reviewing commitments and performance; and addressing operational, legislative, and regulatory issues. The TCO General Director meets parliament members (Majalis) twice a year to provide mid-year and end-of-year project progress reports and general updates on health, environmental and social performance matters. There are also regular meetings with Atyrau and Mangistau Oblasts as well as the Zhylyoi District Akimat.

Regulatory and permitting matters are generally led by the Field Regulatory Compliance group (within the Operations Department) and the Regulatory Affairs and Compliance group (within the OE/HES Department). PGPA's Government Affairs team crafts government advocacy plans to aid TCO SMEs to advocate on their issues.

Engagement activities at the regional and local level include ongoing engagement with the Oblast and city Akimats to share project information, review commitments and performance, and address issues that are best managed at those levels. "Working groups" with relevant stakeholders (e.g. Akimats or designates) enable TCO and local government to discuss issues and share information, in particular to help advance projects such as the FGP-WPMP. Working groups are used to secure agreements with local government to help strengthen the overall execution certainty of projects. In addition to working group meetings, engagement through Government Affairs is likely to include letters – a fundamental vehicle for daily formal communication in Kazakhstan -- and individual meetings.

## 6.3 Engaging Kazakhstani Business

Helping Kazakhstani companies benefit from TCO's business and creating the local capability and capacity to service this is a priority for TCO. To aid its objectives in the area of Kazakhstani Content (KC) development, TCO has developed a KC Plan which sets out how to achieve this goal. It has also created a Domestic Market Development (DMD) group to coordinate TCO's KC efforts and to maximize the benefits of local content development. The DMD works with TCO's Supply Chain Management (SCM) group to identify opportunities within TCO for local suppliers to deliver goods and services. In coordination with PGPA and other appropriate departments, the DMD manages and coordinates external engagements with government as well as with associations and other interests. This includes TCO's participation in engagements through initiatives such as the Aktau Declaration Process and United Kingdom Trade & Investment Forum.

TCO consults with Kazakhstani businesses to support building local capacity and capabilities, and to identify manufacturing and employment opportunities. Businesses are engaged individually as well as through entities such as the Kazakhstan Association of Machine Builders with whom TCO has worked to increase fabrication capabilities, and the National Agency for Local Content Development (NaDLOC).

**6.1 ACTION: Kazakhstani Content (KC).** PGPA will work collaboratively with DMD and SCM to support the KC objectives and so engagement relating to KC is effective and focused on maximizing opportunities for local businesses in Atyrau and Mangistau Oblasts. Preparation of an engagement-focused Execution Plan on KC is underway and will be rolled out in Q1 2016.

## 6.4 Engaging Communities

TCO consults with community stakeholders on an on-going basis through a variety of channels including through a Community Advisory Committee in each of Atyrau and Kulsary, Community Roundtables in select communities prior to Public Hearings and as part of the process to develop its annual social investment program. These events provide opportunities for TCO to present project plans and obtain stakeholder input. Most recently Community Roundtables were held in Zhylyoi District and in Atyrau where Aksakals and local NGOs participated. Some limited engagement also took place as part of the FGP-WPMP ESHIA baseline process.

Alongside regular TCO engagements with communities, the FGP-WPMP has progressed separate EIA-related engagements, from Declaration of Intent (DoI) sessions through Pre-EIA sessions to the sessions related to the EIA Public Hearing in October 2014. TCO carries out engagement as part of the social investment process, as outlined in TCO's SI Plan. The basis for much of TCO's community consultations are its two main social programs, the Egilik ("benefit" in Kazakh) Social Infrastructure Program and the TCO Community Investment Program (CIP). The SI process requires consultation with the right persons and groups so that community development and related social investment is effective, that benefits are widely shared in the community and that projects supported become locally owned and sustainable.

In support of its SI programs, TCO commissioned a Participatory Needs Assessment (PNA) in 2012. The PNA was carried out to engage with a broad range of local and regional community stakeholders to ensure that the Egilik and CIP initiatives are grounded in community needs and priorities. The PNA was based on extensive engagement, with a focus on community consultation, with 21 focus group events in Atyrau, Kulsary and all six villages of the Zhylyoi region around Tengiz.

**6.2 ACTION: Participatory Needs Assessments (PNA).** PGPA will engage a specialist consultant(s) to update the PNA to help define and provide input to future SI programs, including updating SI program objectives, monitoring and evaluation tools and the development of an SI communications plan. This will be initiated in Q1 2016 and completed by Q2 2016.

Another mechanism for community input is via TCO's Grievance Mechanism (see **Section 8**).

## 6.5 Engaging NGOs

NGO input, sought in regard to on-going operations and major capital projects, is achieved through NGO Roundtables, CIP Town Hall meetings, and Public Hearings. Representative NGOs are invited to participate in these initiatives and their input is considered. The NGO Roundtable prior to the presentation of TCO's annual Environmental Protection Plan (EPP) Public Hearing presents an opportunity for NGOs to critique the outcome of previously planned and implemented projects and to make recommendations for additions to the future plan. The NGO Roundtables are a voluntary TCO initiative and involve alongside TCO and NGOs, government.

In addition to engaging with national and local NGOs in Kazakhstan, TCO will monitor international NGO activities and respond to inquiries and engage with these groups on a case-by-case basis.

## 6.6 Engaging with Caspian Sea Experts

Consultation has taken place with Kazakhstani and foreign experts regarding biodiversity conservation, most notably potential impacts on Caspian marine ecology (e.g. from the construction of the marine channel such as dredging, dredge spoil disposal and vessel operations). These engagements have focused on identifying suitable mitigation measures (e.g. potential options for "additional conservation actions") and have included academics from Nazarbayev University, the Kazakh-British Technical University and Leeds and St. Andrews Universities in the UK.

## 6.7 EIA Engagement

In accordance with Kazakhstani EIA legislation, TCO holds a Public Hearing at the different EIA stages (**Declaration of Intent - DoI; pre-EIA** and **EIA** stages), most recently for the FGP-WPMP. These events commenced in August 2010 with DoI engagements (including with Atyrau and Kulsary NGOs) and a DoI Public Hearing, and continued on through pre-EIA and EIA stages, culminating in each case in Public Hearings in 2012 and 2014.

Pre-EIA and EIA engagements have included roundtables with NGOs and communities. Participants included a cross-section of Atyrau, Kulsary and Zhylyoi NGOs, government representatives from the Akimat and Oblast levels, individual community members and representatives from communities in relative proximity to the project, as well as residents of Atyrau and Astana. These engagements culminated with a Public Hearing on 24 October 2014 in Atyrau. An overview of the key issues raised by stakeholder during these events is provided in **Appendix 4**.

## 6.8 Key Stakeholder Issues

TCO uses stakeholder engagements such as the Public Hearings for the FGP-WPMP EIA and related events to hear stakeholder concerns and issues, answer questions raised by stakeholders and to identify and implement targeted stakeholder engagement activities that address specific issues. The TCO Grievance Mechanism (GM) provides individuals and communities another opportunity to raise concerns. The FGP-WPMP ESHIA baseline engagement process identified a variety of stakeholder issues (see **Appendix 4**), which TCO-FGP-WPMP is considering addressing through stakeholder engagement Execution Plans (see **Section 9**). In the course of these activities, the following concerns have been identified:

- **Environmental and Health Issues:** Concerns have been expressed over environmental and health issues related to TCO and FGP-WPMP activities and their potential to cause health problems in the Zhylyoi District. Specific concerns raised include sulfur releases, air quality deterioration (e.g. from dust related to increased traffic during FGP-WPMP construction) and health impacts on TCO workers. Other concerns relate to environmental monitoring and the injection of water and gas into the Tengiz reservoir.

*Note: TCO routinely conducts air quality monitoring activities for sulfur and other emissions, provides results to Atyrau Oblast Environment Department (AOED), and shares results with local stakeholders where applicable. The TCO Grievance Mechanism enables communities to raise concerns over perceived health impacts. The FGP-WPMP's Traffic and Transport Management Plan includes requirements to engage with national and local regulatory bodies; collaborate with local law enforcement on road safety and usage; and conduct community engagement related to road usage and safety.*

- **Water Use:** There are stakeholder concerns that the combined drawdown of water from the FGP-WPMP and TCO could affect the availability of potable and technical water to other users of the KTO pipeline, which will add to existing concerns amongst stakeholders in the Zhylyoi District about the quantity and quality of water. Some stakeholders have expressed concerns that water scarcity could become a problem for agricultural activities and cause harm to livestock.
- **Caspian Sea Environment:** There are concerns over the impact of TCO operations on the Caspian Sea from sulfur deposition and air emissions. Concerns have also been expressed regarding dredging in the NE Caspian and over FGP-WPMP module delivery.
- **Lack of Information:** FGP public hearings saw stakeholders express concern that TCO is only providing positive information about FGP-WPMP and not providing sufficient information about potentially negative impacts and how these are going to be mitigated.

- **Social issues:** Stakeholders have expressed concerns over the delivery of benefits (e.g. community projects), the potential for relocation, and potential impacts on cultural heritage. The continuity of Egilik funding during FGP-WPMP construction and operations has also been raised.
- **Local Hiring and Procurement:** There are concerns that the FGP-WPMP might not lead to substantial local hiring and that the project may not provide significant benefit to Kulsary residents and businesses in particular. Stakeholder expectations that FGP-WPMP will provide local employment opportunities and help to resolve local unemployment, especially youth unemployment, will require particular attention from TCO.
- **Training:** Stakeholders indicated they hoped TCO would provide oil and gas related professional training. Officials also emphasized the importance of internships in technical and non-technical positions.

For further information on forward actions addressing these and other issues, see **Section 9.12**. For an overview of the key issues raised by stakeholders in the various FGP-WPMP Public Hearings since 2010 see **Appendix 4**. Specific concerns or grievances in relation to these and related issues can also be raised via the TCO GM (see **Section 8**).

**6.3 ACTION: Response to Stakeholder Issues.** PGPA will analyze and provide initial feedback to the stakeholder within 5 - 8 working days of a concern or grievance is lodged. Following internal consultation with TCO SMEs, PGPA seeks to resolve concerns and grievances within 30 days. PGPA is responsible for recording the feedback and the response given and entering in the SEMS database.

## 6.9 Negotiated Agreements

In addition to one-on-one engagements and meetings with stakeholders, TCO negotiates MOUs and partnerships with key stakeholders. These negotiations are approached on a case-by-case basis, based on the issue, the stakeholders in question and the engagement objective. Key initiatives include the following:

- **Negotiations:** The Egilik Program is funded annually and was informed in 2012 by the Participatory Needs Assessment. Discussions with the Atyrau Oblast Akimat determine which projects are supported.
- **Workshops/Roundtables:** Roundtables are a forum to discuss a set topic or range of topics where all participants have equal status. TCO has initiated a NGO Roundtable to facilitate more detailed discussion on numerous issues, including those pertaining to TCO's Environmental Protection Plan (EPP). A team of TCO SMEs meet with invited NGOs, NGOs ask questions about existing environmental and related projects and propose additional projects that should be undertaken in TCO's protection plan.
- **Partnerships:** TCO has engaged in various partnerships with government and other entities that provide a basis for engagement and consultation. These include partnerships with various Kazakh NGOs for the CIP. For this purpose NGOs are invited annually to propose projects to be funded by the CIP, with TCO forming partnerships with the successful NGOs to deliver programming.



## 7.0 ENGAGEMENT APPROACH, TOOLS AND METHODS

### 7.1 Introduction

This section sets out TCO's approach to stakeholder engagement and outlines the key engagement tools and methods used, with a focus on stakeholder identification, stakeholder analysis and mapping and communication, issues management and record keeping.

### 7.2 Stakeholder Identification

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have the ability to affect TCO's activities. Stakeholder identification is an on-going process requiring regular review and updates. TCO takes the following into account when identifying stakeholders:

- What type of stakeholder engagement is mandated by law or other requirements;
- Who is likely to be adversely affected by potential impacts in the project's area of influence;
- Who are the most vulnerable groups and whether any special engagement efforts are necessary;
- Which stakeholders can best assist with the early scoping of issues and impacts;
- Who strongly supports or opposes the changes that TCO's activities/projects will bring and why; and
- Whose opposition could be detrimental to the success of TCO's operations and/or major capital projects.

In some cases, the areas of impact may be some distance from the construction site, and the area of influence is correspondingly adjusted to reflect this circumstance. Resources are then prioritized and focused on stakeholders when and where needed.

**7.1 ACTION: Stakeholder Outreach.** The CLO will carry out ongoing community outreach to identify any new stakeholders through existing contacts and to update TCO's stakeholder database. The frequency of community meetings will depend on the specific stakeholder and issue involved. The CLO will summarise community outreach meetings and pass these records to the SEMS administrator for entry into SEMS.

### 7.3 Stakeholder Analysis, Mapping and Prioritization

Once stakeholders have been identified, stakeholder analysis is carried out to understand stakeholder issues and concerns and determine the appropriate method and level of engagement required for any specific stakeholder group. In general, engagement is proportional to impact and influence. For example, as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group intensifies and deepens (e.g. in terms of the frequency and the intensity of the engagement method used).

TCO prioritizes its stakeholders according to a variety of factors. These factors include the ability of a stakeholder to represent the interests of a broad range of the community; the stakeholder's experience working on the issue(s) of relevance to the consultation; and their ability to help TCO broaden an issue's network of stakeholders for further engagement (see **Figure 5.1** above). However, all stakeholders are important and the above approach is intended primarily to help PGPA prioritise effort and resources and not to limit engagement to more vocal or powerful stakeholders. As noted in **Section 9.7** below, TCO is sensitive to the needs and requirements of vulnerable groups and adapts its engagement approach to the circumstances and specific needs of the stakeholder in question. Moreover, engagement proceeds on the basis of what is culturally acceptable and designed using the appropriate methods for each stakeholder group.



## 7.4 Engagement Tools and Communication Methods

TCO seeks to provide stakeholders with accurate, consistent, timely and transparent information on its activities, including on capital projects such as FGP-WPMP in a readily understandable form (e.g. non-technical summary of a project). Project brochures, fact sheets and presentations prepared for Public Hearings and other consultations are used for this purpose. TCO employs a variety of engagement tools and approaches with different stakeholder groups and the stakeholder analysis and mapping process helps TCO to determine the most appropriate tools and methods of engagement.

Key engagement tools and communication methods include the distribution of brochures and leaflets; the publication of newsletters and newspaper announcements (e.g. regarding public hearings, job announcements); communication via the TCO website; and regular face-to-face engagement with identified stakeholders.

An overview of the different types of engagement undertaken by TCO, both proactively and in compliance with Kazakhstani law, is set out below in **Table 7.1**. Engagement can be linked to identified issues (e.g. to address specific stakeholder concerns and/or to build understanding), to share information on identified issues, to identify alternatives for resolution or to build consensus around the resolution of an issue.

**Table 7.1: Ongoing Engagement Activities**

Method	TCO Example
<b>Meetings:</b> <ul style="list-style-type: none"> <li>• proactive or in response to a request from a stakeholder</li> <li>• individual or group</li> <li>• relationship building/educational (not issue specific)</li> <li>• issue specific meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing CIP Update meeting</li> <li>• Annual end-of-year report to national media (Almaty)</li> <li>• Supplier capability meetings (KC) with individual companies</li> <li>• Current and potential suppliers of goods/services</li> <li>• Local businesses and business associations</li> </ul>
<b>Government Meetings</b>	<ul style="list-style-type: none"> <li>• Annual end-of-year report to the Mazhilis (Parliament)</li> <li>• Numerous and ongoing formal and ad hoc engagements at all levels between TCO and republican, regional and local governments to share perspectives on impactful legislation or regulation, projects and programs</li> </ul>
<b>Open Events/ Forums/ Town Halls</b>	<ul style="list-style-type: none"> <li>• FGP-WPMP KC Forum for Kazakhstani businesses</li> <li>• Annual (open) CIP Town Hall: CIP projects partners report on the projects achievements</li> <li>• NGO Award Forum/Town Hall</li> </ul>
<b>Roundtable/ Expert Group</b>	<ul style="list-style-type: none"> <li>• NGO Roundtable to discuss TCO's three year EPP. It occurs in advance of the Public Hearing and provides opportunity for a more thorough and focused conversation with NGOs</li> <li>• Expert Group on KC (as prescribed through republican MOU)</li> </ul>
<b>Working Groups</b>	<ul style="list-style-type: none"> <li>• To advance republican and regional project related agreements</li> <li>• Foreign Investors Committee</li> </ul>
<b>Councils</b>	<ul style="list-style-type: none"> <li>• CACs (Atyrau, Kulsary and planned for Mangistau) by invitation. Held quarterly under charter</li> </ul>
<b>Public Hearings</b>	As required by ROK law: <ul style="list-style-type: none"> <li>• FGP-WPMP public hearings</li> <li>• EPP application hearings</li> </ul>
<b>Grievance Mechanism</b>	TCO has a fully deployed Grievance Mechanism, with grievances and responses addressed in a timely and transparent manner (see Section 8 below) and responses recorded in the SEMS database
<b>Materials</b>	<ol style="list-style-type: none"> <li>1. FGP-WPMP Fact Sheet and Project Brochure</li> <li>2. FGP-WPMP non-technical summary prepared for the Public Hearing in 2010</li> <li>3. Section "Growth for the Future" in 20th Anniversary Book "20 years of Tengizchevroil"</li> <li>4. Declaration of Intent of Investment in Construction and Environmental Conditions Review Document prepared for the DOI-ECR Public Hearing in 2010 that was placed in public places both in Kulsary and Atyrau</li> <li>5. Preliminary EIA document for the pre-EIA Public Hearing in 2012 that was placed in public places both in Kulsary and Atyrau</li> <li>6. EIA document for the EIA Public Hearing in 2014 that was placed in accessible public locations both in Kulsary and Atyrau</li> </ol>

	7. FGP-WPMP Opportunities section on TCO external website that contains information on Suppliers Qualification Process, Technical Specifications and list of Equipment, FGP-WPMP Kazakhstani Suppliers Forum Presentation Materials (FGP-WPMP Overview, KC Opportunities Development, KPJV Presentation, Nabors Presentation and MAC Presentation).
<b>Trade Shows &amp; Conferences</b>	EcoTech, KazEnergy, KIOGE, World Petroleum Congress, Atyrau and Mangistau Oil & Gas Conferences
<b>Web Site &amp; Internet</b>	www.tengizchevroil.com http://www.chevron.com/countries/kazakhstan/
<b>Email/Hotline</b>	tcofp@tengizchevroil.com. Dedicated toll-free telephone line: +7 7122 27 19 74
<b>Engagement through Third Parties</b>	PNAs in support of the CIP and Egilik. (Can also surface community grievance issues)

## 7.5 Issues Management

TCO has implemented an Issues Management System (IMS) compliant with Chevron's OE 10 (Stakeholder Engagement) and OE 13 (Government Affairs and Legislative/Regulatory Advocacy) processes. The IMS interfaces with stakeholder engagement activities; an integrated approach to the governance of both processes provides for alignment between issues management and stakeholder analysis, identification and prioritization. TCO's commitments and actions arising from issues management and stakeholder engagement activities are also linked as a result of inclusion in the SEMS database.

Issues are identified by TCO through proactive engagements with a variety of stakeholders via the following mechanisms:

- Two-way communication with government (issues are raised by both TCO and government);
- Guidance from senior Kazakhstani TCO executives with ties to the Kazakhstani business community and local communities;
- Established forums such as the CAC, EPP, consultations and working groups; and
- NGO roundtables.

In accordance with Chevron's Corporate Process for issue management, each issue progresses through discreet steps that include developing an understanding of the issue followed by crafting of an engagement plan to address the issue. Issue teams are typically cross-functional and oversight of the process is provided at the executive level (Issue Governance Board). Quarterly reports summarize all activity for the period, and provide a summary of issues raised and how they have been addressed, including timeliness of responses and remedial, compensation and mitigation measures to address grievances, and analysis of trends in key performance indicators (KPIs). The KPIs include:

- Total number of stakeholders engaged in each group;
- Geographic location of stakeholders across the TCO's and FGP-WPMP's footprint and elsewhere;
- Numbers of comments and queries received and responses given;
- Issues raised and levels of support for and opposed to TCO and the FGP-WPMP;
- Numbers of grievances lodged; and
- Time taken for resolution of grievances.

Key issues that have arisen, moreover, are entered into the SEMS database. For further reference see **Section 8 (Grievance Mechanism)** and **Section 9.2** below.

## **7.6 Record Keeping**

In 2015, TCO began to document engagements of its Base Business and Major Capital Projects using its Stakeholder Engagement Management System (SEMS). Constructed on the Microsoft Dynamics Customer Relationship Management 2013 platform, the development of the database was driven by the demonstrated success of SEMS in managing stakeholders for Chevron's Australasia Business Unit and its Gorgon natural gas project. Other than adapting the SEMS tool to provide for Russian and English documentation and modifying certain dialogue boxes to correspond with TCO needs, the SEMS tool required no significant customization.

SEMS is used to systematically document detailed information on stakeholders and to record engagement sessions/meetings and outcomes (including commitments) based on information input into the database by the CLO and SE Coordinator. The use of this software provides for more consistent documentation of stakeholder engagement, by tracking that necessary parties are engaged with the right stakeholders at appropriate levels and times. Weekly reports are generated which provide management an understanding of any issue trends arising from issues management and stakeholder engagement activities. The reports also show which TCO employees are using the system, and how they are using it. Data quality is monitored by dedicated SEMS support. Any deficiencies are addressed by the SEMS administrator with the owner of the data record(s). The CLO and SE Coordinator will ensure stakeholder commitments are met.

SEMS includes the following:

- Name and position of stakeholder
- Contact details
- Role, purpose – main objectives of the organization
- Issues or concerns with TCO operations
- Cultural context of engagement (need for specific formalities to arrange or hold meetings)
- Dates and records of meetings, phone calls, letters
- Copies of any agreements – preferably signed by all parties
- Listing of any TCO commitments made, by whom, date of delivery
- Records of sign off on deliverables.

SEMS has a sophisticated categorization and search function, enabling the details of stakeholders to be managed in an efficient and inclusive way, such that all information disclosures, engagement events, commitment targets and stakeholder details are covered as comprehensively as possible. Each engagement with a stakeholder, moreover, is captured and related documents filed and linked to that engagement.

## **7.7 Using the Results of Engagement**

TCO uses the results of the various stakeholder engagement processes in conjunction with TCO's issues management process to identify priorities and understand external stakeholder issues. TCO also considers the results of engagement in improvement of stakeholder relations and related programs such as Egilik and the CIP. Further, TCO uses the results of engagement to inform the business of areas of risk and concern and, where possible, to improve project design and operations.

## 8.0 GRIEVANCE MECHANISM

### 8.1 Introduction

TCO has developed a Grievance Mechanism (GM) that covers TCO base operations and major capital projects. The GM was launched in 2010 and expanded in 2014 as plans for FGP-WPMP were formalized.<sup>7</sup> The GM is aligned with the requirements of IFC PS 1 and Chevron's guidance on grievance management. Its objective is to help TCO limit social risks, mitigate potential conflict and strengthen the relationship between TCO and its stakeholders, especially local communities. Participation in the GM is voluntary and inclusive, with information on the process publicly available. The grievance procedure is available in Kazakh and Russian to allow access to the widest possible audience.

Any stakeholders who consider themselves affected by TCO's activities have access to the GM at no cost. Using the TCO GM will not prevent the complainant from using other alternative dispute mechanism and the statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process. The mechanism allows grievances to be managed in a way that is easy to understand, transparent, confidential, timely and culturally appropriate. Details on the GM process are set out in the TCO GM Process Document. Under this GM, all grievances, whether factual or perceived, are entered into the Grievance Register and addressed, in accordance with the process set out in the TCO GM Process Document.

Information on the GM is available at TCO's HQ in Atyrau, TCO project offices, the Arhaus Centre in Atyrau, and from the CLO function. Stakeholders are also informed about the grievance process via quarterly advertisements in local newspapers in Atyrau, the Zhylyoi district and a newspaper distributed across the Mangistau Oblast. Information on the GM, moreover, is available on the TCO website. This information is also included in TCO's Corporate Responsibility Report, via a GM Fact Sheet (updated on an annual basis) and is made available during consultations and other public meetings.

There are 11 feedback drop boxes available with the need for additional locations reviewed periodically.<sup>8</sup> Public information sessions on the GM are planned throughout the project area, including with communities, local authorities and NGOs to ensure awareness of the GM.

**8.1 ACTION: Communication of GM.** PGPA will continue to publicize the GM so stakeholders are informed on how to submit a grievance.

The GM will also be communicated and rolled out internally with all TCO project staff and contractors so that all are aware of it and can respond to basic queries about it and that all grievances are managed in a consistent way.

**8.2 ACTION: Internal Rollout of GM.** PGPA to communicate and rollout the GM within TCO and to contractors, so all are aware as to how to handle grievances, especially those of an urgent or sensitive nature.

### 8.2 Responsibilities and Process

Responsibility for the GM lies with TCO PGPA. Grievances can be submitted by any individual or group that is directly or indirectly affected by TCO, capital projects and/or TCO's contractor's project related operations or activities. Key day-to-day roles in the GM process are the CLO and the GM Coordinator (see **Section 4**).

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<sup>7</sup> Prior to its formal launch stakeholders would communicate their grievance by formal letter or phone call to senior TCO personnel or individuals with whom they were familiar. TCO decided a formalized, systematic approach to grievances was required, and to charge PGPA with understanding, tracking and providing timely responses to concerns.

<sup>8</sup> Feedback boxes are available at the TCO HQ, Arhus Centre in Atyrau; at Shanyrak Village (Dome 1 – Tengiz); at Shanyrak Village crew change hall, Tengiz; at the Zhylyoi District Akimat Administration office in the Rotational Village; at the TCOV Canteen, Tengiz; at the offices of the Kulsary City Akimat; at the Offices of the Department of Employment and Social Programs, Kulsary; at the FGP-WPMP office at Worley Parsons and PSN offices in Atyrau; and at the FGP-WPMP office in Aktau. Additional locations, away from the Akimat offices, are being sought in Kulsary and the Rotational Village.

TCO will channel the grievance to the GM Coordinator; all personnel will be informed on how to direct the grievance to the right person. In addition, key staff and the PGPA Team will be trained to identify urgent or high-risk grievances, e.g. grievances, which if left unresolved, could result in threats to persons' health and safety, unrest, violence or legal action. Anyone receiving a grievance must pass all information regarding the complaint to the CLO or to the GM Coordinator, so that it can be entered in the Grievance Register and addressed. The grievance process is shown in **Figure 8.1** and the required timelines are set out in TCO's GM Process Document. There is a six-step process for receiving, documenting, processing, responding to and resolving a grievance:

- **Step 1:** Receipt and acknowledgement of grievance;
- **Step 2:** Registration of the grievance in the SEMS Grievance Register;
- **Step 3:** Review and investigation of grievance;
- **Step 4:** Respond to grievance;
- **Step 5:** Resolution and close-out of grievance; and
- **Step 6:** Follow-up and monitoring, as appropriate.

Complaints are reviewed as soon as they are received and prioritised for resolution, in accordance with the procedures set out in the TCO GM Process Document. The CLO will make an initial assessment of the severity of the grievance and enter it into the Grievance Register, to be reviewed and confirmed by the GM Coordinator. Face to face visits will be undertaken if necessary, and at the discretion of the Deputy General Manager, PGPA, to resolve moderate and major grievances (see GM Process Document), though these are not expected to be necessary for minor/routine grievances. The staff member who receives the complaint must report urgent or high-risk grievances immediately to the CLO or GM Coordinator.

**8.3 ACTION: Summarize GM.** PGPA will summarize the GM for external stakeholders and will make it publically available via the TCO website, the TCO project offices and via the CLO by the end of Q1 2016.

### 8.3 Lodging a Grievance

Grievances are registered and logged regardless of whether they are received in writing or verbally. Lodging a grievance is free of charge to the complainant. Grievances can also be submitted anonymously, though in this case it will not be possible to respond directly to the complainant.

While there are no restrictions on the type of issue stakeholders can raise under the GM, the GM does not cover complaints concerning employee, contractor or industrial relations; business integrity or criminal matters; or issues subject to current or pending litigation, which must be filed through the appropriate TCO procedure or that of the relevant contractor. Where such issues are raised via the GM, PGPA will forward them to the relevant party within TCO (or contractor) and inform the stakeholder accordingly. In the interest of continuity of contact, and to ensure that the grievance is addressed by the responsible party.

Grievance forms are available at each drop box site (see **Appendix 3**). Drop boxes are emptied on a weekly basis. Drop box contents are forwarded to the GM Coordinator; and emails and telephone messages are checked on a daily basis. If feedback is received face-to-face in the field it is forwarded in written form to the CLO or GM Coordinator. Small grievances, as assessed by the CLO, will go to the appropriate party in TCO, who will address the grievance immediately. The GM Coordinator reviews all grievances, discusses with the CLO (as appropriate) and proposes a response strategy. While TCO is only able to respond to those providing contact information, feedback provided anonymously is investigated. All feedback is logged and all responses are reviewed with the DGM PGPA.

TCO will document the following information on grievances and enter it into the Grievance Register:

- The name and contact details of the stakeholder lodging the grievance, if appropriate

- The date and nature of the grievance
- The name of the staff charged with addressing the grievance, if appropriate
- Any follow up actions taken
- The proposed resolution of the grievance
- How and when relevant company decisions were communicated to the complainant
- Whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future, if applicable.

Stakeholders lodging a grievance should receive an acknowledgement of the receipt of the grievance within a prescribed and reasonable timeframe.

A full response documenting the final proposed resolution will be provided within 20 days of issuing the initial acknowledgement. Submissions to the GM are reviewed by PGPA and TCO's SME's on a regular basis to see issues or issue themes being raised by stakeholders. The GM Coordinator monitors for any grievance that could impact TCO Base Business or capital projects; and, conversely, how Base Business or projects such as FGP-WPMP affect stakeholders. All GM transactions will be logged and tracked in the SEMS database.

## 8.4 Resolving Grievances

It is in the interest of all concerned that grievances are resolved through the TCO GM in the first instance. However, whereas all efforts are made to find non-judicial resolution, if the grievance cannot be resolved, the complainant has as a last resort the legal/judicial option.

Typically, a grievance is "closed" when a resolution satisfactory to both parties has been reached. In certain situations, however, TCO may "close" a grievance even if the complainant is not satisfied with the outcome.

In all cases, TCO should attempt to obtain acknowledgement from the involved stakeholder that the grievance was addressed by TCO. These acknowledgements should be retained in the SEMS stakeholder tracking database.

**8.4 ACTION: Closeout.** PGPA will be responsible for promptly closing out grievances.

## 8.5 Monitoring and Performance Indicators

TCO will assess the functioning of the GM and, to this end, will prepare periodic monitoring reports including indicators such as: the number of grievances during the reporting period that were opened, resolved, closed; categorisation of grievances (as relevant to the operations and projects – e.g. noise/compensation/smell/safety); and trends in time (e.g. number or category of complaints compared with previous reporting periods). TCO will maintain a record of those who lodge a grievance.

## 8.6 Conflicts of Interest

TCO seeks to avoid potential conflicts of interest. A conflict of interest exists where the interests of an employee or contractor diverge from his or her responsibilities under this GM, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests. TCO seeks to segregate the roles and responsibilities of individuals involved in the GM process for this reason, avoiding putting individuals in a position where conflicts could be perceived to arise. When a Grievance relates to a specific TCO or contractor employee, for example, that person shall not play a role in the GM process.

## **8.7 Protection from Retaliation**

Retribution or retaliation exists where there is any adverse action taken against a complainant with the purpose of frustrating the functioning of this Grievance Mechanism. TCO does not tolerate such conduct.

## 9.0 FUTURE ENGAGEMENT ACTIVITIES

### 9.1 Approach

TCO seeks to help stakeholders understand the engagement process and that they have confidence that their opinions will be heard.

### 9.2 Stakeholder Analysis, Mapping and Prioritization

Moving forward, further stakeholder analysis and mapping will be carried out to inform and determine the consultation needs of the various stakeholder groups, the level of engagement required, and the most appropriate method, timing and frequency of engagement. This will be done using tools such as the stakeholder analysis matrix discussed in **Section 5** and other tools as needed.

**9.1 ACTION: Stakeholder Analysis.** PGPA will undertake stakeholder analysis, mapping and prioritization to determine the most appropriate method, timing and frequency of engagement. Stakeholder analysis for TCO base business and major capital projects will be carried out on an ongoing basis. The results of stakeholder analysis will be documented in the SEMS database.

Stakeholders and their goals can change over time, even in the relatively constant stakeholder environment of TCO. The CLOs, with the support of PGPA, will regularly review and update the stakeholder list to identify and close any potential gaps.

### 9.3 Disclosure Principles

TCO's approach to engagement is based on consistency, transparency and early disclosure of information to stakeholders to dispel rumours and ensure lasting cooperation with communities. Respecting the need for commercial confidentiality and compliance with applicable regulatory requirements, TCO evaluates the nature and risk of the project, and the corresponding area of influence when communicating with stakeholders.

### 9.4 Disclosure, Communication and Engagement Tools

TCO will make the following information available for the TCO FGP-WPMP in Kazakh, Russian and, as appropriate, in English:

- An updated, non-technical project summary, including information on the FGP-WPMP construction schedule, models (as appropriate), maps, drawings etc.
- Non-technical summaries of the ESHIA, the ELCMP, the SEP and related plans)
- A summary of the GM, including the grievance form (posted on the project website and available at the project offices
- The FGP-WPMP EIA (in Kazakh, Russian and English)
- Monitoring data and reports (e.g. site environmental and social report)

The non-technical summary of the FGP-WPMP ESHIA and related documents will be publicized on the TCO website, via press releases and newspaper advertisements in the oblasts affected by the project and via TCOs CLOs and other PGPA staff. TCO will provide appropriate mechanisms for stakeholders to provide feedback on the ESHIA documentation, including through a response mechanism on the TCO website, through comment boxes at project offices in the KPA and through regular contact with community relations staff as part of routine consultation activities. TCO will advise stakeholders on the timetable and process for making comments on the ESHIA, including via the lenders. TCO will engage with local communities and relevant local, regional and national authorities on the content of the ESHIA / Management Plans to discuss key social and environmental impacts and mitigation measures that may affect them.



TCO will include local placement of materials arrange for the publication of articles in the local press and magazines, make presentations at conferences, issue related tenders documentation (in Kazakh and Russian), carry out one-on-one meetings, announce employment opportunities and the FGP-WPMP hiring policy and procedure and make vacancies announcements (in Kazakh and Russian) throughout the life-cycle of the project. Information on TCO will be updated by the CLO function as needed. The CLO function will also implement a schedule of engagement regarding these items.

**9.2 ACTION: ESHIA Non-technical Summary.** PGPA, in cooperation with the relevant SMEs and TCO departments, will prepare and disclose non-technical summaries of key assessments and plans and announce this via the TCO and FGP-WPMP websites and via other means. Disclosure of these materials will be carried out following submission of the ESHIA to government and the approval of the ESHIA by the lenders.

**9.3 ACTION: Project Information Materials.** PGPA, with the support of the relevant SMEs and TCO departments, will develop and maintain information materials that describe the TCO operations and major capital project activities (e.g. FGP-WPMP) in accessible, non-technical language. The content and style of materials will be designed to meet local circumstances and assist understanding by stakeholders. Project materials include, inter alia, a description of the FGP-WPMP, key impacts and mitigations, the FGP-WPMP hiring process, SI, the provision of local benefits and other matters identified in public consultations.

**9.4 ACTION: Local Placement of Information.** PGPA will place relevant TCO and FGP-WPMP materials at high-traffic locations in Zhylyoi District, Atyrau Oblast and Mangistau Oblast. PGPA will arrange for the publication of articles about the FGP-WPMP in the local press and magazines.

### **Meeting Summaries**

A formal Consultation note will be prepared for each stakeholder meeting so that an accurate and detailed record of information and views is documented for stakeholder meetings. Prior to all stakeholder meetings, one member of the engagement team will be appointed to take detailed notes and write them up in a narrative of the consultation using an agreed Consultation Note format including the following information: date, time, location of the meeting; attendees; summary of what information was provided; record of the issues, concerns and perceptions raised by the attendees; TCO responses; and feedback on what can be done to help them with the consultation process.

Where appropriate and agreed upon with community representatives, approved minutes or summaries of key meetings should be shared with attendees. It is important to record the issues, concerns and perceptions raised by the attendees as precisely as possible and to ensure that they are addressed. Even if these concerns are addressed by TCO during the meeting, they should be recorded. The meeting summary notes will be retained in the SEMS.

### **Community Meetings**

Public meetings are a suitable consultation method for reaching a larger number of people in a relatively easy and cost effective way. TCO, through the CLOs, will continue to inform residents of the local villages in Atyrau and Mangistau oblasts of project and TCO developments via community meetings. The CLOs will provide detailed information on project development and the potential environmental and social impacts of the FGP-WPMP and receive feedback and recommendations related to the implementation of the project.

### **CACs**

CACs, created by TCO under charter, meet to discuss a pre-determined agenda of issues and share information. CACs currently exist in Atyrau, and Kulsary.

**9.5 ACTION: CAC.** PGPA will review the CACs for their effective functioning on a regular basis. Where necessary, process improvements will be introduced so the CACs work as effectively as possible.

### **Exhibitions, Posters, Flyers and Notice Boards**

Exhibitions of TCO and FGP-WPMP project information, posters, flyers and notice boards to inform stakeholders will be used by the CLOs and PGPA to disclose information to community members about project activities, employment opportunities, impact management measures including the GM, and specific issues. Selecting the best location (e.g. where the grievance boxes are located) for the notice boards will be done in consultation with community members and the CLOs. These notice boards will be updated and used to inform community members about project activities.

### **Briefing Notes and Fact Sheets**

Briefing Notes and Fact Sheets will be prepared on TCO issues of concern to stakeholders as well as on material FGP-WPMP issues. This will include information fact sheets on key TCO issues and on material FGP-WPMP issues (e.g. dredging, cultural heritage, social investment).

### **Project Office(s)**

TCO has FGP-WPMP project offices in Atyrau and Aktau to operate throughout the FGP-WPMP construction phase. These FGP-WPMP offices provide public access to leaflets, information materials, the chance to view a model of the project, ask questions, post comments and grievances etc. These offices will allow the public to meet and communicate personally with the CLOs (and other company personnel as appropriate), to obtain information on on-going projects, ask questions on topics of interest as well as to lodge complaints or concerns. TCO will make available information in Kazakh, Russian and English.

**9.6 ACTION: Information Offices.** PGPA will determine if an additional project office (such as those in Atyrau and Aktau is required in Kulsary. A decision on whether to open a Kulsary office will be made by the end of Q1 2016.

### **Project Website**

TCO is updating its website to include a separate FGP-WPMP section to inform interested stakeholders with Internet access. The web page will be available in Kazakh, Russian and English, and provide links to all available public documents and communication materials developed for public consultations (such as brochures and posters).

**9.7 ACTION: Project Website.** PGPA, with the assistance of the relevant SMEs and TCO departments, will lead the upgrade of the TCO website and the creation of a FGP-WPMP section on the site. This work will be completed by the end of Q1 2016.

### **Press Releases and Local Media**

PGPA will arrange for articles/announcements in local newspapers and radio announcements to broadcast/publicize information and provide press releases on TCO and the FGP-WPMP. PGPA will also post relevant TCO and FGP-WPMP information on the TCO and FGP-WPMP websites.

## **9.5 MOUs and Good Neighbor Policies**

TCO has developed *The TCO Way* as an equivalent to a Good Neighbor Policy.

*The TCO Way* explains TCO's commitment to being a good partner, one that is focused on building productive, collaborative, trusting and beneficial relationships with the government, other companies, TCO's customers, local communities, and internally. It provides a unifying framework for TCO's goals, values, strategies, and initiatives. It explains who TCO is, what TCO does, what TCO believes, and what TCO plans to accomplish and, by so doing, establishes a common understanding not only for those who work for TCO, but for all those with whom TCO engages.

## 9.6 Stakeholder Commitments Register

The SEMS database will be used as a stakeholder tracking system to monitor and record key aspects with respect to each stakeholder. The SEMS database will be adapted to the needs of the FGP-WPMP as the project evolves so it is easily accessible, searchable, contains records about the stakeholder and outlines deliverables (see **Section 7.6** above). A Stakeholder Commitments Register will be maintained in SEMS documenting all agreements, undertakings or other stated commitments with stakeholders to be met in the short or long term. The Stakeholder Commitments Register is an important tool for documenting agreements and tracking that commitment are delivered and implemented.

**9.8 ACTION: Stakeholder Commitments Register.** PGPA will implement the Stakeholder Commitments Register within SEMS by the end of Q4 2015.

## 9.7 Key Stakeholders

The following represent priority stakeholders for TCO:

- **Local Communities and Regional Stakeholders:** TCO will focus the engagement process on local and regional stakeholders in the Zhylyoi region, especially in Kulsary and the villages surrounding Tengiz. Engagement will include Atyrau Oblast and may include Mangistau Oblast (including the cities of Atyrau and, possibly, Aktau), and include any project-affected vulnerable groups that are identified in the course of stakeholder identification.
- **Government Stakeholders:** TCO has good relations with government and existing engagements with all levels of government will continue.
- **NGOs:** Engagement with national and local NGOs will be expanded. Engagement with international NGOs will be on a case-by-case basis.
- **Contractors and Employees:** TCO will engage on an ongoing basis with individuals employed by TCO and/or FGP-WPMP, including their labor union representatives. Some of the workers are from the local community and are an important conduit for information.
- **Kazakhstani Business:** Engagement with Kazakh businesses, as part of the KC program will continue as outlined in **Section 7**.

Other stakeholders will be engaged with as needed, based on the outcome of regular engagement activities by the CLOs.

## 9.8 Vulnerable Groups

As part of its ongoing project consultation activities, TCO seeks to identify individuals or groups within the company's area of influence who are particularly vulnerable or disadvantaged and who could experience adverse impacts from the projects more severely than others. In keeping with this approach, TCO will take the appropriate action if any vulnerable groups are identified as a result of FGP-WPMP stakeholder engagements, work conducted by the Community Liaison Officers or information arising from other sources.

## 9.9 Monitoring, Auditing and Reporting

The CLOs, with the support of other PGPA staff, will evaluate the effectiveness of stakeholder engagement and participation. Monitoring will be based on criteria as indicated in the plan. Key monitoring criteria are set out in **Appendix 5**.

**9.9 ACTION: Monitoring and Reporting.** PGPA will evaluate the effectiveness of stakeholder engagement and participation on an ongoing basis through monthly reporting of leading and lagging progress indicators, provide feedback on the engagement process to senior management, and identify problems and successes early on so that adjustments can be made to engagement arrangements where necessary using project-specific criteria and indicators.

Compliance with this SEP will be subject to an annual internal audit. Non-compliances identified during these audits will be reported to senior management in accordance with the ELCMP. Compliance with this SEP will be subject to periodic assessment by Project Lenders. The results of audits against this plan will be submitted to the TCO Leadership Team.

**9.10 ACTION: Auditing.** TCO will carry out internal audits of compliance with the SEP and publish a non-technical summary of the audit findings.

TCO PGPA will publish an annual Corporate Responsibility Report including a summary of key issues raised by stakeholders, numbers and subjects of grievances, a categorization of key actions taken to address concerns, analysis of trends in KPIs, and engagement plans and targets for the next year.

## 9.10 Documentation and Feedback

It is important that all stakeholder concerns and commitments are documented in consultation notes and that these are followed up. In cases where commitments are for particular deliverables (jobs, roads, new building, land restoration, etc.) these should be documented and TCO should attempt to obtain acknowledgement from the involved stakeholder that the concern/commitment was addressed by TCO. These acknowledgements should be retained in the SEMS stakeholder tracking database. If the agreement indicates a requirement for action, that action should be tracked in SEMS to ensure close-out.

## 9.11 SEP Review and Key Performance Indicators (KPIs)

This SEP will be reviewed annually. Indicative KPIs for stakeholder engagement are set out in **Table 9.2** below. PGPA will review these KPIs on an ongoing basis and will amend them as needed.

**Table 9.2: Indicative Key Performance Indicators (KPIs)**

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reducing year on year	Grievance Register
Number of grievances resolved within 30 days	90%	Grievance Register
Reporting back to the community/stakeholder on the resolution of the grievance	Delivery of regular reports to the community on the resolution of the Complaints and the acceptance of the resolution by the stakeholder	Reporting
Auditing/Review of GM to ensure it is being communicated and applied so that grievances are adequately addressed	90% of grievances successfully resolved	Audit Report / Grievance Register

## 9.12 Key Stakeholder Issues

A variety of stakeholder concerns have arisen during the FGP-WPMP Public Hearings, on-going TCO stakeholder engagement and in connection with the FGP-WPMP ESHIA baseline process. The key engagement measures TCO will take in this regard are as follows:

**9.11 ACTION: Air Emissions and Public Health:** PGPA, with the support of the relevant SMEs and TCO departments, will engage with a range of stakeholders, including administrators and local government, the CACs, Aksakals and the general public on environmental health, emission monitoring, and public perceptions on these topics. PGPA will communicate and explain TCO efforts to reduce emissions (e.g. reduction in flaring, elimination of sulfur pads, reinjection of gas in the Third Generation Injection Plant - 3GI) starting in Q1 2016. The frequency of these specific engagement activities will be coordinated with TCOs OE/HES department and will be aligned with the FGP-WPMP permitting and public hearing process. Records of these engagement activities will be entered into the SEMS database on a regular basis.

**9.12 ACTION: Road Safety/Traffic.** PGPA, with the support of the relevant SMEs and TCO departments will conduct community engagement and awareness regarding road usage, safety and community health, notably in association with increased road usage for the transport of aggregates for the construction of the COF and CSF. In accordance with the FGP-WPMP's Traffic and Transport Management Plan, PGPA will conduct additional community engagement related to road usage and safety as needed.

**9.13 ACTION: Water Use.** PGPA, with the support of the relevant SMEs and TCO departments, will initiate engagement with local and regional stakeholders starting in 1Q 2016 to address concerns about the impact of the FGP-WPMP on the quantity of potable and technical water available.

**9.14 ACTION: Employment Opportunities.** PGPA, with the support of the relevant SMEs and TCO departments will actively inform relevant stakeholders of the FGP-WPMP's job opportunities; publicize and communicate TCOs hiring protocols and requirements via the TCO website and in a variety of public places.

**9.15 ACTION: Cultural Heritage.** TCO will follow its Chance Finds Procedure.

**9.16 ACTION: Community Safety.** PGPA, with the support of relevant SMEs and TCO departments, will conduct community awareness sessions (as part of the community engagement process) regarding site hazards (e.g. Cargo Facility; Cargo Offloading Facility, Provra point development). These awareness sessions will be held for the duration of the FGP-WPMP construction.

### 9.13 Forward Engagement

Upon receipt of approval for the Final Investment Decision for the FGP-WPMP, TCO will engage with stakeholders to explain the project, understand community concerns and solicit input on the project. This engagement process will include the provision of project information to stakeholders, and cover key impacts and planned mitigation measures. The objective is to ensure that the ESHIA process going forward considers the full range of stakeholder perceptions regarding the FGP-WPMP and, where possible, to address concerns and comments in the context of project design.

**9.17 ACTION: FGP-WPMP Engagement.** PGPA, with the support of the relevant SMEs and TCO departments, will carry out FGP-WPMP-specific engagement with local and regional stakeholders, with the objective of explaining the project and consulting on key impacts and proposed mitigation measures, in accordance with the provisions of the SEP.

Moving forward, engagement activities are being planned on an annual basis, with details of upcoming and specific scheduled events and actions within the planning period. While some events can be foreseen within the planning period, there are often a range of activities that need to be addressed or planned on a much shorter time horizon. The ongoing SEP will provide for resources and staffing to meet anticipated needs. In addition to ongoing, regular engagement with communities and stakeholders, issues might arise that will require specific or issue-focused engagement programs. For these issues, individual engagement plans that are clear on action items, responsibility, resources and timing will be

developed. These issues-specific approaches are designed for effective engagement with all key stakeholders during the planning, construction and implementation of the FGP-WPMP and in relation to TCO Base Operations.

TCO is preparing an issue-focused Consultation Plan (currently in development) based on the key issues listed below. The list is dynamic; it is anticipated that issues will evolve, ebb and flow over time, as stakeholder engagement proceeds and issues are resolved. The importance is to cast the net widely in terms of stakeholder identification and to ensure that stakeholder engagement needs cover the area of impacts/influence, as outlined in the ESHIA.

Engagement to support issues management will follow the process outlined in this SEP, with one engagement process regardless of the issue tailored to the stakeholder(s). Considering that the stakeholders for many of these issues are likely to be the same or overlapping, the objective is not to develop a series of distinct engagement plans for each issue but rather to follow a common approach and a process for ongoing engagement to keep stakeholders aware of how the issues are being managed. An outline of an issue-based engagement plan is provided in **Appendix 6**. The issues-specific consultation plan will outline engagement activities specific to the issue/process, harnessing where appropriate existing TCO methods and tools of engagement and building on engagement undertaken to date with all stakeholders. The plan will provide for meaningful consultation and two-way dialogue with stakeholders and identify the approach to disclosure on each specific issue.

At this point, the key issues to be included in the consultation plan are:

- Community Development / Social investment
- Water Resources and Use
- Environmental aspects of CaTRo (dredging, port development, etc.)
- Road Traffic and Safety (e.g. relating to haul routes for aggregates delivery)
- Kazakhstani Content
- Air Emissions/Public Health
- Seismicity / Surface Subsidence
- Worker – Community Relations
- Industrial Relations / Labor.

The current issues have been identified on the basis of the FGP-WPMP EIA/ESHIA and through existing engagement processes outlined in **Sections 6 - 7**.

## APPENDIX 1 - ACTION PLAN 2015-2016

Action Number	Action	Details	Responsibility / Lead	Resources	Date <sup>9</sup>
0.1	SEP Commitment	Management Team endorses the plan	DGM PGPA / TCO Management Team	Nil	3Q 2015
2.1	Annual SEP Review	Review the SEP and update in 2016	DGM PGPA / SE Business Partner	CLOs and appropriate TCO SE SMEs	Q3 2016
3.1	Compliance	Facilitate discussion with Subject Matter Experts (SME) to ensure that the engagement activities described in this SEP comply with RoK legislation and the provisions of IFC PS 1 and the EP	DGM PGPA / SE Business Partner	Consultant Assistance	Q1 2016
4.1	CLO	Create a CLO position or positions to serve both TCO and FGP-WPMP needs	GM PGPA / DGM PGPA	TCO HR	Q4 2015
5.1	Stakeholder Identification	Update and refine the stakeholder list twice yearly.	DGM PGPA / SE Business Partner	Appropriate TCO SE SME's	Q4 2015
6.1	Kazakhstani Content	PGPA will work collaboratively with DMD and SCM to support the KC objectives and to ensure that engagement relating to KC is effective and focused on maximizing opportunities for local businesses in Atyrau and Mangistau Oblasts. TCO will specifically test with key stakeholders how well its KC strategy efforts are known and understood, how they are perceived, if they are considered successful with a view to identifying opportunities for improvements.	PGPA Manager, FGP-WPMP / Sukhankulova	Kulshayeva, DMD and SCM SME's	Q1 2016
6.2	Participatory Needs Assessment	Update the PNA to help define and provide input to future SI programs.	DGM PGPA/ SE Adviser	Consultant Assistance	Q1 2016
6.3	Response to Stakeholder Concerns	Ensure feedback and the response given are recorded and tracked in SEMS.	SEMS Specialist / SE Business Partner	Appropriate SE SMEs	Weekly
7.1	Stakeholder Identification	Carry out ongoing community outreach to identify new stakeholders through existing contacts	SE Business Partner / CLOs	Appropriate SE SMEs	Ongoing
7.2	Engagement	TCO will engage with government on the need to comply with Equator Principles Funding Institutions disclosure and engagement requirements	GM PGPA / DGM PGPA	TCO Government Affairs specialists	Q4 2015
8.1	Communication on Grievance	Publicize the GM and ongoing process improvements and ensure stakeholders are	DGM PGPA / SE Business Advisor	CLOs, Communications Consultants	4Q 2015

<sup>9</sup> Date means the completion date for a specific action, recognising that the implementation process is already underway for each action included in the plan.

Action Number	Action	Details	Responsibility / Lead	Resources	Date <sup>9</sup>
	Mechanism	informed on how to submit a grievance.			
8.2	Internal roll-out of the GM	Communicate and rollout the revised GM internally with relevant TCO staff and contractors, ensuring all are aware as to how to handle grievances, especially those of an urgent or sensitive nature.	DGM PGPA / SE Business Advisor	Communications Consultants, Supply Chain Management, Industrial Relations	4Q 2015
8.3	Summarize GM	PGPA will summarize the GM for external stakeholders and will make it publically available via the TCO website, the TCO project offices and via the CLO.	FGP PGPA Manager	CLO, Legal,	Q1 2016
8.4	Close-out	Ensure all grievances are addressed and that issues raised are closed-out	DGM PGPA / SE Business Advisor	CLOs	Ongoing
9.1	Stakeholder Analysis	Undertake stakeholder analysis, mapping and prioritization to determine the most appropriate method, timing and frequency of engagement	DGM PGPA / SE Business Advisor	Appropriate SE and IS SMEs	4Q 2015
9.2	Disclosure	Disclose non-technical summaries of key assessments and plans (e.g. ESHIA, ELCMP, SEP) and announce this via the TCO-FGP-WPMP website and through other means (e.g. via the CLO, radio announcements).	DGM PGPA / TCO Communications	Communications Consultants	1Q 2016
9.3	Project Information Materials	Develop and maintain information materials that describe the project and project activities in accessible, non-technical language. Use a style and content to meet local circumstances and to assist in understanding.	DGM PGPA / TCO Communications	Communications Consultants	4Q 2015
9.4	Local Placement of Information	Place materials such as postings and displays locally and arrange for the publication of articles about the project in the local press and magazines. Ensure the CLO provides regular project updates for local noticeboards throughout the life of the project.	DGM PGPA / TCO Communications	Communications Consultants	4Q 2015
9.5	CAC	Review the CACs to provide for their effective functioning	GM PGPA / DGM PGPA	TCO LT	Annually
9.6	Information Offices	Determine if additional office is required in Kulsary	GM PGPA / DGM PGPA	TCO LT	1Q 2016
9.7	Project Website	Update the TCO website and create an FGP-WPMP section on the site. Agree the content and format for posting stakeholder information.	DGM PGPA / Social Media Specialist	Appropriate SE SMEs	1Q 2016
9.8	Stakeholder Commitments Register	Implement the Stakeholder Commitments Register within SEMS and ensure effective data quality assurance process	DG PGPA / SEMS Specialist	Appropriate SE SMEs	4Q 2015
9.9	Monitoring and	Provide management updates on progress of the	DG PGPA / SE Business partner	SEMS Specialist, Issues	1Q 2016



Action Number	Action	Details	Responsibility / Lead	Resources	Date <sup>9</sup>
	Reporting	SEP and consultation on a monthly basis with emphasis on verifying that stakeholders are able to effectively participate in the engagement process. Include a progress summary in the annual CR report		Management Advisor, CLOs	
9.10	Auditing	Carry out annual internal audits of compliance with the SEP.	DGM PGPA / SE Business partner	SEMS Specialist, Issues Management Advisor, CLOs	1Q 2016
9.11	Air Emissions and Public Health	Engage with a range of stakeholders, including administrators and local government, the CAC and Aksakals and the general public on environmental health to address public perceptions on this topic. Communicate and explain TCO efforts to reduce emissions (e.g. reduction in flaring, elimination of sulphur pads, reinjection of gas in 3GI).	DGM PGPA / SE Business Advisor	OE/HES, CLO	1Q 2016
9.12	Road Safety / Traffic	Conduct community engagement and awareness raising to inform and educate communities regarding road usage, safety and community health, notably in association with increased road usage for the transport of aggregates for the construction of the COF and CSF. In accordance with the FGP-WPMP's Traffic and Transport Management Plan, TCO will engage with national and local regulatory bodies; collaborate as required with local law enforcement related to road safety and usage initiatives (signage, pedestrian crossings, barriers etc.); and conduct additional community engagement related to road usage and safety as needed.	DGM PGPA / SE Business Advisor	Operations, OE/HES, CLO	4Q2015
9.13	Water Use	Initiate engagement to address stakeholder concerns about the impact of the FGP-WPMP on the quantity and quality of potable water available.	DGM PGPA / SE Business Advisor	Operations, OE/HES, CLO	1Q 2016
9.14	Employment Opportunities	Develop and implement awareness training programs to enable local workforce (including those within Zhylyoi Region) to be able to preferentially compete for jobs through: understanding FGP-WPMP needs; understanding gaps in skill in local workforce; skills training; hiring procedures for local workforce; hiring procedures for national workforce elsewhere (to prevent in-migration); setting targets for hiring of local workforce; enabling potential employees to be aware of opportunities through consultation	DGM PGPA	SE Adviser CLO	1Q 2016

Action Number	Action	Details	Responsibility / Lead	Resources	Date <sup>9</sup>
		and advertising; targeting recruitment from local educational or technical organisations; and measuring progress. As part of this commitment, actively inform relevant stakeholders of the FGP-WPMP's job opportunities, with the objective of managing expectations about FGP-WPMP employment opportunities. Publicize and communicate TCOs hiring protocols and requirements in a variety of public places and set up recruitment centres away from the TCO and construction sites (e.g. Kulsary, Atyrau, Aktau).			
9.15	Cultural Heritage	Sites of intangible heritage sensitivity (e.g. the cemeteries or tombs) will be avoided if at all possible. If they cannot be avoided, the communities affected by the potential impacts will need to be identified and consulted to establish an appropriate way to clear and/or relocate the sites affected.	DGM PGPA	SE Adviser CLO	1Q 2016
9.16	EIA/ESHIA Engagement	Ensure that EIA/ESHIA engagement plans are prepared by the EIA/ESHIA contractor and approved by TCO and that local stakeholders are consulted with in accordance with the provisions of the plan.	DGM PGPA	SE Adviser CLO	1Q 2016
9.17	FGP-WPMP Engagement	PGPA, with the support of the relevant SMEs and TCO departments, will carry out FGP-WPMP-specific engagement with local and regional stakeholders, with the objective of explaining the project and consulting on key impacts and proposed mitigation measures, in accordance with the provisions of the SEP.	DGM PGPA	SE Advisor CLO	Ongoing

## APPENDIX 2 – STAKEHOLDER LIST

Stakeholder Groups and Types	Relevance to TCO
<b>Government – National and Regional</b>	
RoK Parliamentary Members and Ministers Atyrau Oblast Akimat Zhyloi District Akimat Makat District Administration Mangistau Oblast Akimat Mangistau District Akimat	Government officials interested in plans for TCO activities.  Regional government authorities with permitting and approval requirements that must be met by TCO activities Also responsible for the affected territorial jurisdictions.
<b>Government – Local</b>	
Atyrau City Akimat Kulsary City Akimat Makat City Akimat Aktau City Akimat Kuryk City Akimat Bautino City Akimat Beyneu District Akimat Ahlyoi District Akimat	Local government authorities with responsibility for the affected territorial jurisdictions.
<b>Communities</b>	
Atyrau Oblast communities (outside Zhyloi District) <ul style="list-style-type: none"> <li>- Peretaska/ dacha communities</li> <li>- Fishing villages along Ural river</li> </ul>	Communities potentially interested (and with expectations / concerns) regarding the FGP-WPMP due to previous designs for the module transport route No longer directly affected.
Atyrau Oblast communities (Zhyloi District) <ul style="list-style-type: none"> <li>- Kulsary</li> <li>- New Karaton</li> <li>- Koschagyl</li> <li>- Maikomgen Wintering Farms</li> <li>- Akkuduk Wintering Farms</li> </ul>	Households, communities and community groups that may experience impacts (positive or negative) as a result of TCO activities.
Mangistau Oblast communities <ul style="list-style-type: none"> <li>- communities potentially affected by rail use</li> <li>- communities potentially affected by activities in fabrication yards</li> <li>- communities potentially affected by barge staging or movements (Bautino, Kuryk, Aktau)</li> <li>- communities potentially affected by quarries / vehicle movements</li> </ul>	
Community Based Organisations (CBOs) <ul style="list-style-type: none"> <li>- TCO Community Advisory Council (CAC)</li> <li>- Head of Peretaska dacha committee (No longer directly affected)</li> <li>- Fishing cooperative along Ural River (No longer directly affected)</li> <li>- Fishing Cooperatives in Mangistau coastal areas</li> <li>- Aksakals (community elders group)</li> </ul>	Interested groups that may have expectations / concerns or whose members could be directly impacted.
<b>Workers and their representatives</b>	
TCO workforce Contractor workforce	Individuals employed by TCO or its contractors; their labour union representatives and worker families. Some of the workers will be from the local community and are an important conduit for information.
<b>Private Sector</b>	
Business organisations Fishing / Fish Processing / Fish Breeding companies (eg. sturgeon hatcheries, Atyrau Balyk, Erinkala and Rakusha village cooperatives, Village Fishing Cooperatives) Companies - potential suppliers and contractors	Individuals or organisation with direct economic interest or concerns about the TCO / FGP-WPMP. This may be through gaining contracts with the TCO or due to potential economic impacts caused by the TCO.

Stakeholder Groups and Types	Relevance to TCO
<b>Civil Society and Non-Governmental Organisations (NGOs)</b>	
International NGOs <sup>(10)</sup>	Organisations with direct interest in the Stakeholders and / or who can influence the FGP-WPMP directly or indirectly through public opinion. Such organisations may also have useful data and insight.
National NGOs	
Local NGOs and Civil Society Groups e.g.: <ul style="list-style-type: none"> <li>- Regional Aarhus Centre</li> <li>- Demos</li> <li>- Kaspyi Tabigaty</li> <li>- Kaspyi-XXI</li> <li>- Globus</li> <li>- Darkhan-1</li> <li>- Rauan Youth Fund</li> <li>- Ayaly Orta</li> <li>- Caspian fish and seal scientists (eg. CISS)</li> </ul>	
<b>IFIs and Donors</b>	
Multilateral and Bilateral Organisations	Potential financiers with requirements for international good practice.
<b>Other</b>	
Fishing Regulatory Institutes (Government bodies regulating fishing activities) Caspian Seal Scientists at Leeds University Caspian Seal Scientists at St Andrews University Range of RoK scientistws (marine, ornithology, etc)	Other international, regional and local groups with direct interest in the FGP-WPMP.

(10) International NGOs will be engaged based on those with an interest in the area, particular potential impacts and a presence in Kazakhstan.



## APPENDIX 4. KEY ISSUES RAISED AT FGP-WPMP PUBLIC HEARINGS AND RELATED STAKEHOLDER EVENTS

Completed Engagements	Objectives & key topics	Audience	Information Presented	Issues/Concerns raised
<p><b>“Declaration of Intent to Invest in FGP-WPMP Construction and Tengiz Environmental Conditions Review” (DOI ECR) Public Hearing: August 10, 2010</b></p>	<p>In compliance with Environmental Code of the Republic of Kazakhstan DOI ECR Public Hearing was held to build awareness, to receive stakeholders’ opinions, concerns, thoughts and suggestions on TCO operations and environmental component.</p>	<p>Number of participants: 162</p> <ul style="list-style-type: none"> <li>• Zhylyoi Region Akimat</li> <li>• Atyrau Oblast Akimat</li> <li>• Kulsary Community</li> <li>• Zhana Karaton Village Community</li> <li>• Shokpatorgay Village Community</li> <li>• Kosshagyl Village Community</li> <li>• Maikumgen Village Community</li> <li>• Turgyzba Village Community</li> <li>• Akkiztogay Village Community Member</li> <li>• 8<sup>th</sup> Aul Community</li> <li>• 5<sup>th</sup> Aul Community</li> <li>• 4<sup>th</sup> Aul Community</li> <li>• Atyrau Community</li> <li>• Astana Community Member</li> </ul>	<ul style="list-style-type: none"> <li>• “Tengizchevroil Review Report” presentation</li> <li>• “Declaration of Intent to Invest in Construction” presentation</li> <li>• “Integrated Environmental Conditions Review Report” presentation</li> <li>• “FGP-WPMP Plans” presentation</li> </ul>	<ul style="list-style-type: none"> <li>• Air pollution</li> <li>• Trees planting</li> <li>• Public health</li> <li>• Sulfur influence on people’s health</li> <li>• Early death-rate</li> <li>• Hiring of Zhylyoi Region residents</li> <li>• Water supply</li> <li>• City aesthetics after water pipeline installation, landscaping</li> <li>• Replacement of old computers in regional school previously equipped by TCO</li> <li>• Social infrastructure in Zhylyoi Region (gas, water, roads)</li> <li>• Kulsary-Tengiz road condition</li> <li>• Social Benefits: loans, sanatorium, summer camps</li> <li>• Kazakhstani Content</li> <li>• Salary level difference</li> <li>• Possible relocation</li> </ul>
<p><b>Pre FGP-WPMP DOI ECR Public Hearing engagements:</b></p>				
<p><i>1st Round Table with Atyrau NGOs: July 12, 2010</i></p>	<p>Give overview of project plans for planned DOI ECR Public Hearing; receive stakeholders’ opinions, concerns.</p>	<p>NGO Organizations:</p> <ul style="list-style-type: none"> <li>• Atyrau Law and Business Youth Organization</li> <li>• “Akparat”</li> <li>• “Darhan-1”</li> <li>• “Ayaly Orta”</li> <li>• “Mugedek Alemi”</li> <li>• “Zhasyl EI”</li> <li>• “Demos”</li> <li>• “Zaman”</li> <li>• “Severo-Kaspiyskiy Press-Club”</li> <li>• “Globus”</li> <li>• “Nezavisimoe Pokolenie Kazakhstana”</li> </ul>	<ul style="list-style-type: none"> <li>• FGP-WPMP Environmental Permitting Stages</li> <li>• Public Hearing Details</li> <li>• Introduction to TCO</li> <li>• Tengiz and its Surroundings Map</li> <li>• Tengiz Area Layout</li> <li>• Consistent Record of Increasing Production.</li> <li>• TCO Safety Performance</li> <li>• Corporate Social Responsibility</li> <li>• Environmental Investments</li> <li>• Previous TCO Environmental Impact Assessments</li> <li>• Tengiz Monitoring</li> <li>• Air Emissions Reductions</li> <li>• Gas Flaring Reductions</li> <li>• Soil, Flora and Fauna Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Oil extraction from unauthorized depths</li> <li>• Public health</li> <li>• Heart attack death-rate</li> <li>• FGP-WPMP information transparency (profits, economic, environmental, social issues of the project)</li> <li>• Project name concrete definition to be clear for community</li> <li>• Social projects</li> <li>• Emissions</li> <li>• Climate change</li> <li>• Conditions of road to Tengiz</li> <li>• Non-technical summary of the</li> </ul>

		<ul style="list-style-type: none"> <li>• “Alshy”</li> <li>• “Kaspiy Tabigaty”</li> <li>• “Bolashak”</li> </ul>	<ul style="list-style-type: none"> <li>• Overall Environmental Impact Estimate</li> <li>• TCO Sulfur Production</li> <li>• Safe Sulfur Storage in Blocks</li> <li>• Decreasing Sulfur Reserves</li> <li>• FGP-WPMP Overview</li> <li>• Sour Gas Injection Enhances Oil Recovery and Lowers Emissions</li> <li>• FGP-WPMP’s Commitment to Safety</li> <li>• FGP-WPMP Supportive of Kazakhstan Goods and Services</li> <li>• Kazakhstan Employment Opportunities</li> <li>• Potential FGP-WPMP Environmental Impacts</li> <li>• FGP-WPMP Environmental Impact Mitigation Principles</li> <li>• FGP-WPMP Milestone Schedule</li> <li>• Next Steps</li> <li>• Future Engagements</li> </ul>	<ul style="list-style-type: none"> <li>• project</li> <li>• Sulfur</li> <li>• Benefits for Kazakhstani Citizens after project execution</li> </ul>
<p><i>Round Table with Kulsary NGOs: July 15, 2010</i></p>	<p>Give overview of project plans for planned DOI ECR Public Hearing; receive stakeholders’ opinions, concerns.</p>	<p>NGO Organizations:</p> <ul style="list-style-type: none"> <li>• Internal Policy Department</li> <li>• “Ken-Zhyloi” Regional Newspaper</li> <li>• “Sharapatty Shanyrak” Open Society</li> <li>• “Zhyloi Demeui”</li> <li>• “Barys Densaulyk Kluby”</li> <li>• Zhyloi Region Veterans Council</li> <li>• “Daryn” Fund</li> <li>• “Zhurek Zhylyuy”</li> </ul>	<ul style="list-style-type: none"> <li>• FGP-WPMP Environmental Permitting Stages</li> <li>• Public Hearing Details</li> <li>• Introduction to TCO</li> <li>• Tengiz and its Surroundings Map</li> <li>• Tengiz Area Layout</li> <li>• Consistent Record of Increasing Production</li> <li>• TCO Delivers World Class Project Safety</li> <li>• TCO Safety Performance</li> <li>• Corporate Social Responsibility</li> <li>• Environmental Investments</li> <li>• Previous TCO Environmental Impact Assessments</li> <li>• Tengiz Monitoring</li> <li>• Air Emissions Reductions</li> <li>• Gas Flaring Reductions</li> <li>• Soil, Flora and Fauna Monitoring</li> <li>• Overall Environmental Impact Estimate</li> <li>• TCO Sulfur Production</li> <li>• Safe Sulfur Storage in Blocks</li> <li>• Decreasing Sulfur Reserves</li> </ul>	<ul style="list-style-type: none"> <li>• Module transportation road</li> <li>• Environmental projects</li> <li>• Sulfur</li> <li>• Social - sanitary procedures for TCO employees who are Kulsary residents during their rotation off</li> <li>• Social projects</li> <li>• TCO support in deepening of Kamyskol lake</li> </ul>
<p><i>Meeting with Zhylyoi Region Akim: July 20, 2010</i></p>	<p>Give overview of project plans for planned DOI ECR Public Hearing; receive stakeholders’</p>	<ul style="list-style-type: none"> <li>• Zhylyoi Region Akimat</li> </ul>	<ul style="list-style-type: none"> <li>• FGP-WPMP Overview</li> </ul>	<ul style="list-style-type: none"> <li>• Project schedule</li> <li>• Planned Public Hearing alignment with Zhylyoi Region Akimat and Atyrau Oblast Akimat</li> </ul>

	opinions, concerns.			<ul style="list-style-type: none"> <li>Public Hearing date confirmation</li> <li>Gas price lowering</li> <li>Social projects support from FGP-WPMP</li> </ul>
<i>2nd Round Table with Atyrau NGOs: July 22, 2010</i>	Give overview of project plans for planned DOI ECR Public Hearing; receive stakeholders' opinions, concerns.	<p>NGO Organizations:</p> <ul style="list-style-type: none"> <li>"Darhan 1"</li> <li>"Kaspiy Tabigaty"</li> <li>"Centr Pomoshi"</li> <li>"Zhasyl EI"</li> <li>"Ayaly Orta"</li> <li>"Atyrau Students Alliance"</li> <li>"Severo-Kaspiyskiy Press Club"</li> <li>"Akparat"</li> <li>"Kazakhstan Zhazushylar Odagy"</li> <li>"Alshy"</li> <li>"Leadership Club"</li> <li>"Globus"</li> <li>"Nezavisimoe Pokolenie Kazakhstanana"</li> <li>"Zhanartau Atyrau"</li> </ul>	<ul style="list-style-type: none"> <li>FGP-WPMP Overview</li> <li>Presentation of the answers to the questions asked on the 1<sup>st</sup> Round Table with Atyrau NGOs on July 12, 2010 regarding FGP-WPMP</li> <li>Presentation of the answers to the questions asked on the 1<sup>st</sup> Round Table with Atyrau NGOs on July 12, 2010 regarding TCO</li> <li>Answers to environmental questions asked on the 1<sup>st</sup> Round Table with Atyrau NGOs on July 12, 2010</li> </ul>	<ul style="list-style-type: none"> <li>Gas Injection</li> <li>Environmental information availability in Media</li> <li>Public Hearing venue</li> <li>Economic transparency</li> <li>Flaring</li> <li>Public health</li> <li>Trees planting plan</li> <li>Caspian See impact</li> <li>Emissions from existing and new facilities</li> <li>Employment for Kulsary residents</li> </ul>
<i>FGP-WPMP Preliminary Environmental Impact Assessment (Pre-EIA) Public Hearing: April 13, 2012</i>	In compliance with Environmental Code of the Republic of Kazakhstan Pre-EIA Public Hearing was held to build awareness, to receive stakeholders' opinions, concerns, thoughts and suggestions on TCO operations and environmental component.	<p>Number of participants: 146</p> <ul style="list-style-type: none"> <li>Atyrau Oblast and City Akimats</li> <li>Atyrau and Kulsary NGOs</li> <li>Atyrau Community</li> <li>Zhylyoi Region Community</li> <li>Media</li> <li>Atyrau enterprises and companies</li> <li>Atyrau vocational school, colleges and university students</li> </ul>	<ul style="list-style-type: none"> <li>TCO Overview Presentation</li> <li>FGP-WPMP Plans Presentation</li> <li>FGP-WPMP Feasibility Study Presentation</li> <li>FGP-WPMP Preliminary Environmental Impact Assessment Presentation</li> </ul>	<ul style="list-style-type: none"> <li>Modular construction technology</li> <li>Excavating channel in the vicinity of Tengiz for transportation</li> <li>Module transportation</li> <li>Atyrau-Tengiz haul road</li> <li>Gas injection</li> <li>Caspian See</li> <li>Public health</li> <li>Sulfur</li> <li>Emissions</li> <li>Poor gas quality provided to Zhylyoi Region</li> <li>Technical water supply to Zhana Karaton</li> <li>Benefits for Atyrau community from the project</li> <li>Egilik Program budget increase</li> </ul>



				<ul style="list-style-type: none"> <li>• Employment process transparency</li> <li>• Dredging in the area up to the North Caspian mouth and the Ural River mouth</li> <li>• Drilling additional wells</li> <li>• Volume of reserves remained after period of concession</li> <li>• Independent monitoring of the environment</li> <li>• Historical Monuments and Sites Preservation and Research</li> <li>• Landscaping work plans in Atyrau</li> <li>• TCO support in organizing excursion to Astana and Turkestan for Zhylyoi Region elders</li> </ul>
<b>Pre FGP-WPMP Pre-EIA Public Hearing engagements:</b>				
<i>Round Table with Kulsary Elders: 14 March 2012</i>	Give overview of project plans for Public Hearing; receive stakeholders' opinions, concerns.	<ul style="list-style-type: none"> <li>• Zhylyoi Region Elders</li> </ul>	<b>FGP-WPMP Overview:</b> <ul style="list-style-type: none"> <li>• Environmental impact assessment stages</li> <li>• TCO strategic concepts – leadership in safety and environmental conservation</li> <li>• Project concept, Implementation strategy - modularization</li> <li>• FGP-WPMP schedule</li> <li>• FGP-WPMP facilities map</li> <li>• TCO performed environmental impact assessment</li> <li>• Overall ecosystem impact within TCO area</li> <li>• Environmental monitoring within Tengiz oilfield</li> <li>• Preliminary FGP-WPMP environmental impact assessment</li> <li>• FGP-WPMP's potential environmental impact mitigation</li> <li>• FGP-WPMP Incident and Injury Free</li> </ul>	<ul style="list-style-type: none"> <li>• Gas Injection</li> <li>• Gas price lowering</li> <li>• Poor gas quality provided to Zhylyoi Region</li> <li>• Public health</li> <li>• Employment of Zhylyoi Region residents</li> <li>• Kulsary-Tengiz road condition</li> <li>• TCO to control money funded for road repairs</li> <li>• Social infrastructure</li> <li>• Sanitary Protection Zone</li> <li>• Module transportation route</li> <li>• TCO to supply technical water for garden irrigation</li> <li>• Tree planting support by TCO</li> </ul>
<i>Round Table with Kulsary NGOs: 14 March 2012</i>	Give overview of project plans for Public Hearing; receive stakeholders'	<ul style="list-style-type: none"> <li>• Zhylyoi Region NGO Organizations</li> </ul>	<b>FGP-WPMP Overview:</b> <ul style="list-style-type: none"> <li>• Stages of Environmental Impact Assessment</li> <li>• TCO Strategy – Leadership in Safety and Environmental Protection</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental impact by operations</li> <li>• Reservoir pressure decline</li> <li>• Module transportation route</li> </ul>

	opinions, concerns.		<ul style="list-style-type: none"> <li>• Modularization - the Project's Concept, Implementation Strategy</li> <li>• FGP-WPMP Schedule</li> <li>• FGP-WPMP Facilities Map</li> <li>• TCO performed Environmental Impact Assessments</li> <li>• Overall Ecosystem Impact within TCO Area</li> <li>• Environmental Monitoring within Tengiz field</li> <li>• Preliminary FGP-WPMP Environmental Impact Assessment</li> <li>• Potential FGP-WPMP Environmental Impact Mitigation</li> <li>• FGP-WPMP Incident Injury Free</li> </ul>	<ul style="list-style-type: none"> <li>• Monitoring wells</li> <li>• Water supply</li> <li>• Social projects funds allocation monitoring</li> <li>• Sulfur</li> <li>• Social infrastructure</li> <li>• Excursion to Tengiz facilities for children</li> <li>• TCO to support by providing buses for excursion for children</li> <li>• Children's health</li> <li>• NGOs' support to TCO in project realization</li> </ul>
<i>Round Table with Atyrau NGOs: March 28, 2012</i>	Give overview of project plans for Public Hearing; receive stakeholders' opinions, concerns.	<ul style="list-style-type: none"> <li>• Zhayk-Caspian Aarhus Center</li> <li>• Atyrau Oblast Youth Maslikhat</li> </ul> NGO Organizations and Associations: <ul style="list-style-type: none"> <li>• "Independent Generation of Kazakhstan"</li> <li>• "Alshyn" Fund for Literature, History and Culture</li> <li>• "Kaspiy Tabigaty"</li> <li>• "Darkhan"</li> <li>• "Demos"</li> <li>• "Ecology and Safety Vital Activity"</li> <li>• "Globus"</li> <li>• "Megapolis"</li> <li>• "Akparat"</li> <li>• "Youth Bank Initiatives"</li> <li>• Association of Sociologists and Politologists of Kazakhstan, Atyrau branch</li> <li>• Business Women's Association of Kazakhstan, Atyrau branch</li> <li>• "Civil Alliance of Atyrau oblast"</li> </ul>	<ul style="list-style-type: none"> <li>• Stages of Environmental Impact Assessment</li> <li>• Project concept and execution – Module Construction Strategy</li> <li>• FGP-WPMP facilities layout</li> <li>• TCO Environmental Impact Assessments</li> <li>• Total impact on the ecosystem in the TCO JV area</li> <li>• Tengiz environmental monitoring</li> <li>• FGP-WPMP Preliminary Environmental Impact Assessment</li> <li>• FGP-WPMP mitigating potential environmental impacts</li> <li>• Incident and Injury Free Culture</li> </ul>	<ul style="list-style-type: none"> <li>• Modular construction strategy</li> <li>• Module transportation</li> <li>• TCO to consider option of channel dredging in Caspian Sea for module transportation</li> <li>• Construction schedule</li> <li>• Environmental protection</li> <li>• Dredging in preserved area</li> <li>• Port alternatives information request</li> <li>• Benefits for local community</li> <li>• Youth employment</li> <li>• Social infrastructure</li> <li>• Kazakhstani Content</li> <li>• Sanitary protection zone</li> <li>• Relocation</li> <li>• Social investment project efficiency</li> <li>• Actions in case Historical Monuments and Sites are found</li> <li>• FGP-WPMP and SGP cost deference</li> <li>• Environmental impact assessments</li> </ul>
<i>Community Advisory Council</i>	Give overview of project plans for	<ul style="list-style-type: none"> <li>• Atyrau Oblast Akimat</li> <li>• Atyrau Oblast Maslikhat</li> </ul>	<ul style="list-style-type: none"> <li>• FGP-WPMP Overview presentation</li> <li>• FGP-WPMP - Preliminary Environment Impact</li> </ul>	<ul style="list-style-type: none"> <li>• TCO to consider option of channel dredging in Caspian Sea</li> </ul>

<i>(CAC): March 29, 2012</i>	Public Hearing; receive stakeholders' opinions, concerns.	<ul style="list-style-type: none"> <li>• Enterprise &amp; Industry Administration of Atyrau Oblast</li> <li>• "Nur Otan" People's Democratic Party Atyrau branch</li> <li>• Construction Administration</li> <li>• Zhayk-Caspian Aarhus Center</li> <li>• Public Association 'Caspiy Tabigaty'</li> </ul>	Assessment presentation	<ul style="list-style-type: none"> <li>• for module transportation</li> <li>• Involvement of all stakeholders</li> <li>• Module transportation route</li> <li>• Impact on Caspian Sea</li> <li>• Emissions</li> <li>• Kazakhstani Content, Kazakhstani fabrication yards</li> <li>• Economic benefits</li> <li>• Atyrau Oblast residents employment</li> <li>• Training</li> </ul>
<i>FGP-WPMP Environment Impact Assessment (EIA) Public Hearing: October 24, 2014</i>	In compliance with Environmental Code of the Republic of Kazakhstan EIA Public Hearing was held to build awareness, to receive stakeholders' opinions, concerns, thoughts and suggestions on TCO operations and environmental component.	<p>Number of participants: 141</p> <ul style="list-style-type: none"> <li>• Atyrau Oblast Akimat</li> <li>• Atyrau NGOs</li> <li>• Atyrau Community</li> <li>• Zhylyoi Region Community, Elders</li> <li>• Media</li> <li>• Atyrau enterprises and companies</li> <li>• Atyrau colleges and university teachers and students</li> </ul>	<ul style="list-style-type: none"> <li>• TCO Overview presentation</li> <li>• FGP-WPMP Overview presentation</li> <li>• FGP-WPMP General Technical Project Documentation presentation</li> <li>• FGP-WPMP Environment Impact Assessment presentation</li> </ul>	<ul style="list-style-type: none"> <li>• Historical and archaeological monuments</li> <li>• Gas injection, water injection</li> <li>• FGP-WPMP and SGP cost deference</li> <li>• Number of wells to be drilled</li> <li>• Emissions</li> <li>• Emissions monitoring</li> <li>• Caspian Sea</li> <li>• TCO support in organizing excursion to Astana and Turkestan for Zhylyoi Region elders</li> <li>• Module transportation route</li> <li>• Public health</li> <li>• Death-rate of woman of childbearing age</li> <li>• Kigach River water use</li> <li>• Emissions from FGP-WPMP during its construction and operation</li> <li>• Reservoir pressure</li> <li>• Security of people that will be employed on the project (facts of mass disorders in the past)</li> <li>• Sulfur impact on Caspian Sea</li> <li>• Trees planting in Zhylyoi Region</li> <li>• Kamyskol lake water use</li> </ul>
<b>Pre FGP-WPMP EIA Public Hearing engagements:</b>				
<i>Round Table with Zhylyoi Region Elders and NGOs:</i>	Give overview of project plans for Public Hearing;	<ul style="list-style-type: none"> <li>• Zhylyoi Region Elders, veterans of work and NGO Organizations</li> </ul>	FGP-WPMP and Environmental Impact Assessment Overview presentation: <ul style="list-style-type: none"> <li>• FGP-WPMP Overview</li> </ul>	<ul style="list-style-type: none"> <li>• Sulfur storage</li> <li>• Environmental condition of the region</li> </ul>

<p>October 14, 2014</p>	<p>receive stakeholders' opinions, concerns.</p>		<ul style="list-style-type: none"> <li>• FGP-WPMP modularization strategy review</li> <li>• Site report. Project update. Infrastructure</li> <li>• FGP-WPMP current status</li> <li>• TCO Environmental Impact Assessment</li> <li>• TCO Ecological Monitoring</li> <li>• FGP-WPMP Environmental Impact Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Public health</li> <li>• Death-rate increase</li> <li>• Wells number and their depth</li> <li>• Tectonic deformations, earthquakes</li> <li>• Gas price lowering</li> <li>• FGP-WPMP benefits</li> <li>• Local people training and employment</li> <li>• Social projects</li> <li>• Tree planting status</li> </ul>
<p>Round Table with Atyrau NGOs: October 15, 2014</p>	<p>Give overview of project plans for Public Hearing; receive stakeholders' opinions, concerns.</p>	<ul style="list-style-type: none"> <li>• Zhayk-Caspian Aarhus Center</li> <li>• NGO Organizations and Associations: <ul style="list-style-type: none"> <li>• Aarhus Center</li> <li>• Youth Public Association</li> </ul> </li> <li>• "Independent generation of Kazakhstan"</li> <li>• Literary and historical cultural fund "Alshy"</li> <li>• "Oralman- Zhaiyk"</li> <li>• "Kaspiy tabigaty"</li> <li>• "Darkhan-1"</li> <li>• "Akparat"</li> <li>• "Ayaly Orta"</li> <li>• "Zaman"</li> <li>• "North Caspian Press Club"</li> <li>• "Megapolis"</li> <li>• "Analar uydisty"</li> <li>• "Mugedek alemi"</li> <li>• College of Business and Law</li> <li>• Industrial College</li> <li>• "Kutty bilim"</li> <li>• Atyrau Institute of Oil and Gas</li> <li>• "Zhas Ulan"</li> <li>• Energy and Construction College</li> <li>• Atyrau Polytechnic College</li> <li>• Atyrau Technological College of Oil and Gas</li> </ul>	<p>FGP-WPMP Overview Presentation:</p> <ul style="list-style-type: none"> <li>• FGP-WPMP modularization strategy</li> <li>• Site report. Project update. Infrastructure</li> <li>• FGP-WPMP current status</li> </ul> <p>FGP-WPMP Environmental Impact Assessment Overview:</p> <ul style="list-style-type: none"> <li>• FGP-WPMP EIA development stages</li> <li>• EIA scope and goals</li> <li>• The ambient air present condition</li> <li>• The ambient air impact assessment</li> <li>• Simulation of air pollution in surface layer</li> <li>• Sanitary protection zone</li> <li>• Process simulation for pollutants long-range transmission within the air and their fallout</li> <li>• Forecasting of pollutant fallout effect</li> <li>• Water consumption and reuse</li> <li>• Water discharge</li> <li>• Industrial and consumption waste</li> <li>• Soil and vegetation cover</li> <li>• Flora and fauna</li> </ul>	<ul style="list-style-type: none"> <li>• Emissions limit</li> <li>• Water sources being considered as an alternative by the project</li> <li>• Module transportation route</li> <li>• Caspian Sea</li> <li>• Groundwater</li> <li>• Public health</li> <li>• Operating personnel social protection, health care activities</li> <li>• Quality of ambient air both outside and inside the sanitary protection zone</li> <li>• Percentage of FGP-WPMP Kazakhstani Content</li> <li>• Increase of the Egilik Program budget after FGP-WPMP execution</li> <li>• Consideration of gas turbine replacement with an alternative power source</li> </ul>

## APPENDIX 5: ENGAGEMENT MONITORING CRITERIA

- Tracking of numbers of engagement activities with communities and government authorities;
- The recording and tracking of commitments made to stakeholders;
- Any grievances received and their resolution;
- Nature of reporting in the media;
- Feedback from government, partners, reports, NGOs and communities;
- Enhanced relationships with target audiences;
- Monitoring that all high priority stakeholders, as defined in the SEP, are engaged.
- Materials disseminated: types, frequency, and location;
- Place and time of engagements and level of participation, including by stakeholder groups;
- Comments from government, village leaders and other parties and passed to the Project;
- Number of disruptions to business (schedule, cost impact) due to external stakeholder issues within TCO's ability to influence;
- Key messages are conveyed to target audiences; and
- Surveys of community attitudes and perceptions.

In support of this, records will be kept of:

- Numbers of visitors to the Project Offices to be established (Atyrau, Kulsary and Aktau), and comments received by other routes (website, project offices, drop boxes, mail, phone, visits);
- Numbers and type of stakeholders who come into contact with the Project team by mail, webpage and any other means of communication;
- Number of comments by topic and type of stakeholder, and details of feedback provided;
- Numbers and types of grievances and the nature and timing of their resolution.

## APPENDIX 6. OUTLINE OF ISSUE-BASED ENGAGEMENT PLAN

- **ISSUE (NAME AND DATE)**

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[Name the issue and the relevant date. Executive-level brief]

- **ISSUE OWNER**

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[Identify the issue owner in TCO]

- **ISSUE DESCRIPTION**

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[Description of the issue, its context and background]

- **KEY STAKEHOLDERS**

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[Identify the key stakeholders relating to this issue - big buckets such as regulators and government; community groups; and conservation societies]

- **CURRENT SITUATION**

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[Describe the current situation regarding the issue and its management and the importance of stakeholders in relation to the issue]

- **Desired Outcome**

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[Spell out the desired situation TCO wishes to achieve]

- **STRATEGY AND ACTIONS FOR ENGAGEMENT AND ISSUE MANAGEMENT**

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[Identify the strategy for managing the issue, what the desired situation is, what mitigation options exist and set out how TCO will develop and deliver messages and engage with stakeholders to explain and build alignment (e.g. data-driven, principles-based)]

- **POTENTIAL TRIGGER POINTS**

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[Discuss what events could lead to an escalation of the issue]

- **TIMING, PLANNING, RESOURCES AND SUPPORTING MATERIALS**

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[Describe the timing, key resources and planning steps needed to implement the plan. Set out the specific actions to address the issue and deal with stakeholders including supporting materials that should be disclosed, how and when they should be disclosed - e.g. non-technical summary of ESHIA, website, town hall meetings, open house, and briefing notes/issue sheets etc.]

- **KEY MESSAGES AND PROOF POINTS**

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[2-3 key messages with 2-3 supporting proof-points, with the latter able to be substantiated in an audit situation]

- **TACTICS AND OBJECTIVES**

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[Listing of all tactics envisaged being used to effectively engage on the issue. Tactic examples are media relations, open houses, one-on-one meetings, etc., with the objectives for each noting how the tactic will further our goal of building honest, open dialogue leading to true partnership]

- **MEASURES OF SUCCESS**

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[3-5 SMART measures]