



Reference No. 3
to the decision
of the Joint Stock Company
«National Company»
«Kazakhstan Temir Zholy»
protocol dated May 16, 2023
No. 02/13

**Management in the Environmental Management System in the Joint-Stock
Company "National Company" Kazakhstan Temir Zholy "
and its associate organizations**

Revision 1.0

Document Group:	management system standard
Developer:	Department of Technical Policy
Responsible for the analysis and updating of the document:	Department of Technical Policy

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1. General provisions

The Guidelines for the environmental management system in the joint stock company "National Company "Kazakhstan Temir Zholy and its subsidiaries (hereinafter referred to as the Guidelines) have been developed in accordance with the requirements of the legislation of the Republic of Kazakhstan and the international standard ISO14001:2015 "Environmental Management Systems". Requirements and guidelines for use and is the main document on the environmental management system of the Joint Stock Company "National Company "Kazakhstan Temir Zholy" and its subsidiaries.

The action of the Manual applies to all structural divisions of the joint-stock company "National Company "Kazakhstan Temir Zholy" and its subsidiaries.

2. Terms, definitions and abbreviations

The following terms and abbreviations are used in this Manual:

environment

the totality of natural and artificial objects, including atmospheric air, the ozone layer of the earth, surface and groundwater, earth, subsoil, flora and fauna, as well as climate in their interaction;

environmental protection

a system of state and public measures aimed at preserving and restoring the environment, preventing the negative impact of economic and other activities on the environment and eliminating its consequences;

ecosystem

being an objectively existing part of the natural environment, a dynamic complex of communities of plants, animals and other organisms, their inanimate habitat, interacting as a single functional whole and interconnected by the exchange of matter and energy, which has spatial and territorial boundaries.

biological diversity/biodiversity

Variability (the ability to exist in different variants) of living organisms from all sources, including terrestrial, marine and other aquatic ecosystems and ecological complexes of which they are part, and includes diversity within

sustainable development	the species, between species and diversity of ecosystems socio-economic development achieved without violating environmental sustainability, while ensuring environmental safety and environmentally balanced use of natural resources in order to meet the needs of present and future generations fairly.
environmental monitoring	systematic observation and assessment of the state of the environment and its impact;
environmental risk	the probability of adverse changes in the state of the environment and (or) natural objects due to the influence of certain factors;
environmental aspect	an element formed in the course of an organization's activities, the release of its products or the provision of services that interacts with the environment;
audit	a systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the degree of compliance with audit criteria;
JSC "NC "KTZ", The Company	Joint Stock Company "National Company" Kazakhstan Temir Zholy";
affiliate organization/AO	legal entities, 100% of whose shares (participation interests) belong to JSC NC KTZ on the right of ownership or trust management;
internal control	inspection, audit carried out by the responsible structural subdivision of the Company and AO in the field of environmental protection;
pollution prevention	the use of processes, practices, methods, materials, products, services or energy to eliminate, reduce or manage the creation, emissions or discharges of any pollution or waste in order to reduce negative environmental impacts;
senior management	Chairman of the Management Board

industrial safety service

and members of the Management Board of JSC NC KTZ;

structural divisions and/or divisions within structural divisions and/or employees of divisions at all levels of management of the Company and AO, carrying out activities in the field of industrial safety;

network level division

a division of the Company/AO that is directly subordinate to the Company's management/AO to in accordance with the local act of the Company/AO;

regional level division

Company Division/AO, whose activities are coordinated by a network-level subdivision in accordance with the regulations on the network-level subdivision;

line-level division

a division of the Company/AO that is under the operational subordination of a regional-level subdivision in accordance with the internal documents of a regional-level subdivision;

process owners

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

the SMART principle

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

structural divisions/ SD

departments, services, branches, assigned staff, representative offices of

**group of companies of JSC "NC
"KTZ"**

Inspection

JSC "NC "KTZ", including those located outside the Republic of Kazakhstan;

JSC "NC "KTZ" and its subsidiaries;

Occupational Safety and Environmental Inspection of the branch of JSC NC "KTZ" - "Multifunctional service Center".

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

3. Environmental protection policy

The Company's environmental policy is reflected in the document - Corporate ideology and business philosophy, which corresponds to the Company's goals, provides a basis for defining environmental objectives, and also includes the Company's obligations to meet environmental protection requirements and prevent environmental pollution.

The Company and its subsidiaries must improve the environmental management system and direct all efforts to reduce the negative impact on the environment and humans associated, including with greenhouse gas emissions into the atmosphere, takes all necessary measures to preserve biodiversity and the ecosystem, as well as measures to form and develop a corporate environmental culture.

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

3.1 Obligations of the Company and AO in the field of environmental protection

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

- 1) compliance with the requirements of the legislation of the Republic of Kazakhstan and other applicable to the Company's activities and UP to the requirements in the field of environmental protection, including the norms of international law and the requirements of the international standard ISO 14001;
- 2) continuous improvement of the environmental management system;

- 3) when implementing the planned activities, conduct an environmental impact assessment with a mandatory assessment of the risks of the impact of activities on the biodiversity of flora and fauna;
- 4) preservation of the environment and biological diversity, introduction of tools for the efficient use of natural resources and electric energy;
- 5) minimization of potential direct, secondary and cumulative impacts on biodiversity;
- 6) when carrying out activities, do not allow a negative impact on the state of the animal world, habitat, breeding conditions and migration routes of animals, in compliance with environmental requirements that ensure the preservation of the animal world and its habitat.
- 7) maximum application of preventive measures aimed at preventing the occurrence of risky events in the field of ecology;
- 8) reducing the negative impact on the environment by ensuring internal control and prevention of its pollution by emissions, discharges, rational use of natural resources and proper disposal of waste activities;
- 9) formation of a caring and respectful attitude to the environment, strengthening the responsibility of each employee for environmental protection and ensuring appropriate approaches to work and employee training;
- 10) protection of water resources from all types of pollution, including diffuse pollution (pollution through the earth's surface, soil, subsoil or atmospheric air);
- 11) adoption of mandatory measures to reduce water consumption and reuse through wastewater treatment;
- 12) conducting continuous monitoring of the use of water resources, the quality of wastewater and natural waters;
- 13) management of emissions of pollutants into the environment by ensuring industrial environmental control of emissions, discharges and waste;
- 14) interaction and exchange of experience with stakeholders and other business entities on environmental issues in order to improve environmental performance;
- 15) openness and reliability of the Company's and AO's reporting in the field of environmental protection;

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

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

4 Environmental safety in structural divisions and AO

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

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

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

The activities of structural divisions and subsidiaries in the field of environmental protection, industrial environmental control and environmental safety are regulated by the Environmental Code of the Republic of Kazakhstan, this Manual and other internal documents of the Company and subsidiaries.

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

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

4.1 Requirements in the field of atmospheric air protection

The protection of atmospheric air in structural divisions and AO is carried out in accordance with the Environmental Code of the Republic of Kazakhstan, this Manual, as well as the relevant internal documents of the Company and AO.

SP and AO, carrying out the technological process associated with the release of pollutants into the atmospheric air, must have appropriate installations and equipment for cleaning emissions that reduce the negative impact on the atmospheric air.

The number and list of pollutants emitted into the atmosphere by stationary sources of the structural unit is regulated by a permit for emissions of pollutants into the atmosphere. Standards of permissible emissions for mobile sources are not established.

4.2 Requirements in the field of water resources protection

Protection of water resources by structural units and AO should be carried out in accordance with the procedure established by the water legislation of the Republic of Kazakhstan.

SP and AO are obliged to comply with the rules of general water use established by local representative bodies of regions, cities of republican significance, the capital.

Construction, reconstruction (expansion, modernization, technical re-equipment, re-profiling), operation, conservation, liquidation of objects affecting the condition of water bodies are carried out in the presence of a positive conclusion of the authorized state body in the field of environmental protection, the authorized body for the study of subsoil, the state body in the field of sanitary and epidemiological welfare of the population and the authorized body in the field of civil protection. Polluted water diverted from production facilities, administrative and household buildings and structures, as well as polluted stormwater runoff from the Company's facilities and AO should not be discharged into surface water bodies, on the surface of soil and soil without their purification to the maximum permissible concentrations established by the Environmental Code of the Republic of Kazakhstan.

During the operation of industrial, economic and other facilities, in order to prevent contamination of surface reservoirs, groundwater and groundwater, it is prohibited:

- discharge wastewater into water bodies that have not undergone sanitary treatment and/or neutralization, as well as wastewater that does not meet the requirements of technical regulations;

- to take (withdraw) water resources from a water body in an amount that has a negative impact on the water body;
- to discharge wastewater into water bodies containing pathogens of infectious diseases, as well as harmful substances for which standards of maximum permissible concentrations are not established.

JV and AO, which discharge wastewater, must use water volume meters and keep records of water consumption and wastewater disposal in accordance with the water legislation of the Republic of Kazakhstan.

SP and AO for the purpose of rational use of water resources, as far as possible and appropriate, should develop and implement measures for the reuse of water, recycled water supply.

4.3 Requirements in the field of protection of land resources

Protection of land resources by structural divisions and AO be carried out in accordance with the land legislation of the Republic of Kazakhstan.

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

SP and AO, which are waste generators, are responsible for the safe handling of them until the waste is transferred for recycling or disposal to specialized third-party organizations.

The limits of accumulation and disposal of waste for structural units and subsidiaries that have places of accumulation of waste that are part of objects of categories I and II are established on the basis of an appropriate environmental permit.

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

The limits of accumulation and disposal of waste are not established for objects of categories III and IV.

It is prohibited to accumulate waste exceeding the deadlines specified in paragraph 2 of Article 320 of the Environmental Code of the Republic of Kazakhstan, and (or) exceeding the established limits of waste accumulation (for objects of categories I and II) or the volumes of waste accumulation specified in the declaration on environmental impact (for objects of category III).

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

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

Environmental foundations of sustainable development and reduction of the Company's carbon footprint

The ecological foundations of sustainable development are:

- 1) formation and maintenance of sustainable production and consumption patterns, minimization of anthropogenic impact (direct or indirect impact of human activities on the environment) on the environment, reduction of consumption of non-renewable natural resources, reduction of waste generation and disposal, as well as stimulation of their use as secondary resources;
- 2) implementation of measures to preserve the sustainable functioning of natural ecological systems, conservation of biological diversity and prevention of degradation of the natural environment;
- 3) the Company's participation in the global response to the threat of climate change by implementing measures to protect the ozone layer of the earth's atmosphere;

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

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

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

Strategic goals and objectives to reduce the carbon footprint in the Company are implemented in accordance with the Concept of low-carbon development of JSC "Samruk-Kazyna" and the Concept of low-carbon development of the Joint Stock Company "National Company "Kazakhstan Temir Zholy" and its subsidiaries until 2060. According to the Concept of low-carbon development of JSC "Samruk-Kazyna" for the transport sector, measures to reduce the carbon footprint will be implemented in two main directions:

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

6 Obligations to comply with legal requirements

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

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

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

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

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

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

7 Identification of environmental aspects, risk assessment

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

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

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

The structural divisions of the Company and AO develop goals in the field of environmental management, plans to reduce environmental risks.

Goals in the field of environmental management are set taking into account identified environmental aspects, risks and opportunities and are formed on the basis of the SMART principle:

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

Measurable: measurability (the goal must be measurable);

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

Relevant: significance (the goal should be aimed at increasing efficiency and improving performance);

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

The goals in the field of environmental management of the network-level division are coordinated with the corporate-level industrial safety service and approved by the owner of the network-level management process.

The goals in the field of environmental management of network-level divisions are cascaded into regional-level divisions, the goals in the field of environmental management of regional-level divisions are cascaded into linear-level divisions.

The goals in the field of environmental management of a regional-level subdivision are approved with the approval of the owner of the network-level process.

The goals in the field of environmental management of a line-level division are approved with the approval of the owner of the regional-level process.

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

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

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

- 1) deadlines;
- 2) quality of execution;
- 3) execution progress;
- 4) sufficiency of financing.

9 Planning of environmental measures

In order to achieve the goals in the field of environmental protection, environmental action plans are being developed in the divisions of the network, regional and linear levels of management.

Planning of environmental management activities is inextricably linked to the general planning cycle in the Company and takes into account:

- 1) requirements of regulatory legal acts of the Republic of Kazakhstan, international standards regulating the activities of the Company and AO in the field of environmental protection;
- 2) significant environmental aspects, risks and opportunities.

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

When planning measures, measures for all previously identified violations are taken into account, since the fact of detecting a violation is evidence of an emergency situation requiring an immediate solution to an environmental problem. Ensuring the financing of such events is mandatory, and the responsibility is borne by the financial and economic services of the joint venture and AO to the Company.

It is prohibited to exclude from the budgets of expenditures and action plans and/or postpone to a later date the implementation of projects aimed at eliminating critical

violations in the field of environmental protection, except in cases where their relevance is objectively proven due to the introduction of new equipment, technologies, the introduction of new production processes.

The action plan for environmental protection activities is developed annually in accordance with Annex 1 to this Manual.

Action plans for environmental protection activities of the supervising structural units of the joint venture and AO are developed taking into account the plans of the supervised structural units (from bottom to top).

The environmental action plan includes the following sections:

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

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

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

This section reflects measures to prevent the negative impact of wastewater on the environment, land reclamation after the termination of the operation of storage facilities, commissioning (reconstruction) of treatment facilities, the introduction of recycling and reuse of water, storm drains, the construction of oil traps, flotation plants (a device that separates a mixture of water and pollutants through the use of air flow), installation of drain trays with oil collectors provided for by the draft standards of maximum permissible discharges into the environment;

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

This section reflects measures for the storage and removal of industrial waste, cleaning of the territory from petroleum products and other industrial waste, cutting of contaminated soil, equipment of sites for the storage of scrap metal and other waste, recycling of waste, conservation of biodiversity on the right-of-way of railways, in the area of stations and train stations, planting trees and shrubs;

4) section 4. "Development and adjustment of regulatory technical documentation";

This section reflects measures for the development (adjustment) of draft emission standards, environmental impact assessment, industrial environmental control programs, hazardous waste passports and other regulatory documents

required in accordance with the environmental legislation of the Republic of Kazakhstan.;

5) Section 5. "Training of specialists engaged in environmental protection activities, which reflects information about the need for training of workers engaged in environmental protection activities."

The action plan for environmental protection activities is submitted in the following terms:

- 1) by divisions of the linear and regional levels – before September 1 of the year preceding the planned year - to network-level divisions for the code;
- 2) network–level divisions - until December 1 of the year preceding the planned year, submit for review and approval to the Inspectorate consolidated Environmental Action Plans, previously agreed upon by the financial and economic services of network-level divisions.

The action plan for environmental protection activities is approved:

- 1) in the departments of the linear and regional levels – the first heads of departments after coordination with the m division of the network level;
- 2) in network–level divisions - the first head of the network-level division after coordination with the Inspection.

The effectiveness of measures in the field of environmental protection is assessed by the industrial safety service by comparing the indicators in the field of industrial safety for the current reporting period with the indicators for the same period last year.

The assessment of the effectiveness of environmental protection measures is the input information for the analysis of the effectiveness of the activities of the network, regional and linear levels of the unit.

Typical measures in the field of environmental protection are given in Annex 2 to this Manual.

10. Implementation and operation

10.1 Resources, roles, responsibilities and powers

The top management ensures the availability of resources (human, technological, financial and others) necessary for the development, implementation, operation and improvement of the environmental management system in accordance with the legislative requirements of the Republic of Kazakhstan and local acts of the Company, AO. The responsibility for the allocation of resources is borne by the

Deputy Chairmen of the Management Board in charge of the relevant type of activity, as well as the first heads of structural divisions and subsidiaries.

Deputy Chairmen of the Management Board, Managing Directors of the Company are responsible for the organization of environmental activities and requirements for compliance with environmental culture in the supervised structural divisions and AO.

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

The heads of the joint venture and the AO are responsible for the proper organization of work, the implementation of planned activities, the execution of the instructions of authorized state bodies, for violation of environmental legislation.

Environmental activities in the joint venture and the AO are carried out by employees whose job descriptions contain responsibilities for their performance of environmental protection work, while in regional-level divisions additional responsibilities (loads) related to the performance of other activities are not assigned to these employees.

10.2 Functions of structural divisions of JSC "NC "KTZ" and AO for environmental protection

The network management level units perform the following functions in relation to the supervised regional and line level units:

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

2) implementation of guidelines on environmental protection and environmental management;

3) implementation of control:

taking into account the consumption of natural resources;

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

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

for timely submission of reports to the Inspection on the forms according to appendices 3,4,5 to this Manual;

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

for the implementation of environmental protection measures, as well as the activities of managers, specialists responsible for the organization of work on environmental protection;

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

4) coordination of work:

- on the creation of harmless productions;
- study and dissemination of best practices in the field of environmental protection;
- development and processing of regulatory and technical documents on environmental protection;
- to prepare proposals for the exchange of experience and international cooperation in the field of environmental protection;
- rational use of natural resources.

Regional and line level divisions perform the following functions:

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

2) planning of environmental measures;

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

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

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

- 6) development of hazardous waste passports;
- 7) conducting an inventory of environmental pollution sources;
- 8) control over the amount of emissions (discharges) of pollutants into the environment, reduction of emissions of harmful substances through the use of purification systems and their improvement in order to increase the efficiency of purification;
- 9) compliance with the instructions of state environmental inspectors and elimination of violations identified during internal control;
- 10) keeping records of information on quantitative and qualitative characteristics of waste and methods of treatment;
- 12) submission of reports in accordance with the established procedure to the relevant territorial state authorized bodies provided for by the legislation of the Republic of Kazakhstan on environmental protection.

10.3 Competence, training and awareness

The Company and the AO determine the necessary competence of personnel in accordance with the List of positions (professions) of railway transport workers and the qualification requirements imposed on them and approved by the authorized body, as well as the relevant qualification reference books and professional standards.

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

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

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

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

In order to maintain the professional knowledge of railway transport workers, improve the efficiency and quality of work, labor productivity, and ensure the requirements of environmental protection, technical training is conducted in the Company in accordance with the Standard of technical training in the joint stock

company "National Company "Kazakhstan Temir Zholy" and its subsidiaries, approved by a separate local act of the Company.

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

10.4 Communication

Within the framework of the functioning of the environmental management system, the Company and its subsidiaries communicate with stakeholders on environmental protection issues during conference calls, internal and state control, when involving personnel in identifying environmental aspects, assessing risks and opportunities, through communication means

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

Feedback on environmental protection issues can be carried out both through the specified channels and through the hotlines indicated on the Company's website and in other ways that do not contradict the legislation of the Republic of Kazakhstan.

Individual information materials and documents on environmental protection issues are posted on the Company's corporate information portal (KIP) and are updated as they are updated.

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

One of the ways to bring information is the corners on ecology in the structural divisions of the Company and to all levels of management.

11 Documented information

The documentation of the Company's environmental management system and AO to includes:

The policy of JSC "NC "KTZ" - Corporate ideology and business philosophy and goals of the Company;

Management guide for the group of companies of JSC "NC "KTZ";

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

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

Within the framework of document management, the nomenclature of environmental safety cases should be maintained in regional and line-level divisions. The mandatory list of documents of the nomenclature of environmental safety cases should contain:

job descriptions of responsible environmental protection workers;

Environmental action plans;

environmental reports and analyses;

Draft standards of maximum permissible emissions (MPI);

Projects of maximum permissible discharges (PDS);

Waste Standards Placement Program (PRNO)

conclusions of the state ecological expertise;

Industrial Environmental control program;

permits for emissions into the environment;

contracts for the provision of works and services in environmental protection;

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

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

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

correspondence with individuals and legal entities on environmental issues;

state statistical reports on ecology (2-TP air, 4OC), declaration;

inventory reports on non-hazardous and hazardous waste provided to authorized bodies in the field of environmental protection;

reports on Industrial environmental control (PEC) submitted to the authorized bodies in the field of environmental protection;

reports on the implementation of special environmental management conditions submitted to the authorized bodies in the field of environmental protection;

list of hazardous waste, hazardous waste passports and related correspondence;

registers of environmental (including significant) aspects, risks, corrective action plans to reduce hazards and risks;

journal of production and consumption waste accounting;

Journal of registration of appeals, complaints, feedback from residents due to local pollution (noise, continuous lighting, landscape aesthetics, vibrations) related to the activities of JSC NC KTZ.

The above list may be supplemented with other documents, taking into account the specifics of the activities of structural units, AO"

12. Operations and risk management

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

Environmental protection is carried out by:

developing and implementing action plans for environmental protection activities aimed at ensuring environmental protection;

voluntary and compulsory environmental insurance;

implementation of industrial environmental control;

carrying out scheduled preventive maintenance.

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

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

The process of managing the operations of providing information on possible significant environmental impacts associated with the transportation of products and services and with the processes of use, end of life and disposal of its products and services is implemented during the implementation of industrial environmental control in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan.

13. Prevention of emergency situations, preparedness for them and elimination of their consequences

Management of the emergency prevention and liquidation system is carried out in accordance with the requirements of the Standard "Prevention and liquidation of emergency situations in JSC "NC "KTZ" and its AO, approved by a separate local act of the Company.

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

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

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

14. Verification

14.1 Measurement and monitoring

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

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

The divisions of the Company's network level and AO to monitor the implementation of environmental protection action plans, the state of environmental protection and submit to the Inspection:

- 1) a report on the implementation of the environmental action plan in accordance with Annex 3 to this Manual - quarterly until the 5th day of the month following the reporting quarter;.
- 2) a report on the state of environmental protection in accordance with Annex 4 to this Manual - quarterly, until the 10th day of the month following the reporting quarter;
- 3) information on current environmental indicators in accordance with Annex 5 to this Manual - quarterly, until the 10th day of the month following the reporting quarter.

Attached to the reports are:

explanatory notes;

analysis of the current situation on the implementation of environmental measures;

information on the development of planned funds;

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

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

Industrial environmental control is carried out by operators of objects of I and II categories on the basis of the industrial environmental control program, which is part of the environmental permit, as well as the program for improving environmental efficiency.

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

Divisions of the regional and linear level provide reports required in accordance with the legislation of the Republic of Kazakhstan to the territorial state authorized environmental protection bodies in accordance with the established procedure.

14.2. Internal control of environmental management

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

In order to monitor compliance with regulatory legal acts of the Republic of Kazakhstan and regulatory and technical documents in the field of ecology, control over the state of environmental protection, identification of environmental aspects and risk assessment, elimination of inconsistencies identified during previous audits, as well as the implementation of environmental protection measures, internal control of the state of environmental protection is carried out in the Company's group at different levels of management Wednesday.

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

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

Based on the results of internal control of the units, the audited party develops corrective measures to eliminate inconsistencies in accordance with paragraph 14.3 of this Manual.

14.3 Nonconformities and corrective actions

According to the results of state and internal environmental control, the structural divisions of the Company and AO to carry out corrective measures regulating the procedure for eliminating inconsistencies, implementing corrections and corrective actions.

Corrective actions can be taken based on the results:

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

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- 3) monitoring the activity of the process and measuring the results of the activity;
- 4) identification of nonconforming products or services (after the delivery of products, during or after the provision of services);
- 5) analysis and evaluation of compliance with the requirements of regulatory legal acts of the Republic of Kazakhstan, local acts of JSC "NC "KTZ", as well as international standards of management systems, interstate and national standards, technical regulations.

The management of nonconformities in the Company and AO is carried out in accordance with the Company's internal documents regulating the procedure for managing nonconformities, managing incidents with determining their root causes, preventing emergency situations.

14.4. Performance analysis

The analysis of the state of environmental management is carried out once a quarter at all levels of the Company's management and AO.

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

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

changes in internal and external factors related to environmental protection;

needs and expectations of stakeholders;

information from external stakeholders, including complaints;

information about opportunities for improvement;

information on the state of environmental protection and implementation of environmental action plans;

execution (status) of regulations issued by state regulatory authorities and based on the results of internal control;

analysis of the causes of identified violations during internal control, internal audit and review of regulations of state regulatory authorities;

effectiveness of measures taken to manage significant environmental risks and establish new goals and objectives in the field of environmental protection;

information on training, advanced training of the Company's employees and AO;

the results of the previous analysis of the effectiveness of the process.

The analysis of the effectiveness of the Company's environmental activities is carried out once a year by the Company's top management.