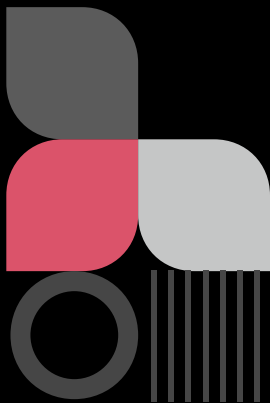


TOP 50 ESG Disclosure Companies in Kazakhstan

Fourth edition
(based on 2022 reports)

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Introduction

As each of us looks for their own way in the ever-evolving business landscape, it becomes increasingly clear that sustainability is not a stand-alone concept, but a complex network of interconnected pillars linked to all aspects of business, economy and everyday life. To make them sustainable a systematic approach to initiatives and solutions to problems that are in fact general, not specific, is required.

Sustainability is not a catchphrase, but is in fact a fundamental goal which we must all actively strive to achieve if we want to leave a better world for our children and future generations. Otherwise, the scenario of George Miller's film "Mad Max" will very likely become our true future.

Whatever we look at, whatever daily issues we solve, and moreover, all our needs must come through the lens of sustainable development. Sustainable development is not a distant phrase about the environment "that I do not impact", it is everything we live and breathe every day, and influence with our vital activities. Therefore, it is important to approach each task responsibly now so that we have time to preserve what we have not yet lost and move forward collaboratively.

Addressing each problem separately, rather than in an integrated way, is likely to bring minimal or short-term effects, which does not provide long-term results. While recognizing the interconnectedness of problems, we can develop steps that address multiple challenges simultaneously, leading to reliable and systematic results.

Resources, whether financial, human or natural, are not infinite. But we still treat them as independent sources and establish only additional ministries that strive for different goals and have contradicting KPIs. In fact, no one can achieve the desired outcomes in such a system, since no one makes decisions.

Integrated thinking, the ability to consider issues together, as a complex system of the body, will help us solve problems with more compact resources with a multiplicative effect.

Many of the problems we talk about today cannot be solved within one organization, and **collaboration is a critical element of success**. You do not know where to start? Start with yourself. It is essential to take the initiative, and this is only possible with a deep understanding of the challenges that we as a society face today.

I suggest each of us to consider how our roles and projects intersect with broader sustainable development goals. Let us open up opportunities for collaboration, share ideas, and together find out how we can use our collective efforts to create significant impact.

Our commitment to sustainability is not just a corporate responsibility; it is an investment in the longevity and prosperity of both our own organization and the economy as a whole. But for this, we need to take a broader look at the issues we are dealing with and always keep the big picture in mind.

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Our evaluation approach



What we evaluated

In compiling this ESG Disclosure Rating (the “Rating”), we reviewed the companies’ annual reports and sustainability reports (including integrated reports, ESG reports, and social reports), referred to as the “Reports.” We evaluate the completeness, quality and availability of ESG information. We assessed how easy we think it would be for stakeholders to find the necessary ESG data.

When compiling the current Rating, we evaluated the Reports prepared by companies based on the results of their activities for **2022**. The total sample included **96 companies** operating in Kazakhstan. The sample included companies that submitted official applications for participation in the Rating, as well as Reports from the year 2022, which we found in the public domain. Based on the results of the evaluation, **a list of the TOP-50 companies based on the level of ESG disclosure** was prepared (p. 61).

This year, four companies that could have been on the TOP-50 of the Rating were excluded from the list, and will no longer take part in further editions of the Rating.

When compiling the Rating, we evaluated only the existence of information, and not its reliability or accuracy. However, if we had a concern that the company's report is misleading to readers and the information presented in the report does not correlate with established facts and company's statements, we reserve the right to downgrade the company's rating.

How we evaluated

Our ESG disclosure evaluation methodology includes 129 criteria. Each criterion is scored on a scale from 1 to 10, where 10 means the leading disclosure quality. The final rating is calculated as a weighted average of ratings by criteria. Depending on the score obtained, the company is assigned the corresponding Rating value.

The evaluation criteria are divided into five main disclosure blocks (hereinafter referred to as the “**Analysis of the Five**”):

- ESG strategy,
- corporate governance,
- society,
- environmental impact,
- reporting practices.

Additional scores were awarded for clarity, relevance and quality of information presented.

When compiling the Ranking, we place enhanced focus on the independence of the panel of experts conducting the evaluation and quality management (see page 70 for more details).

A more detailed evaluation methodology can be found on page 66.

Summary (1/3)



Development of reporting

This year, we have significantly raised the requirements for evaluating the level of disclosure of ESG Information of Kazakhstani companies, by putting more emphasis on approaches to governance and strategy, and adding industry-specific indicators. However, we see that the development of Kazakhstani non-financial reporting as a whole is catching up with these international trends that we have introduced, and a significant number of companies withstand even the enhanced evaluation criteria. In our view, this indicates that sustainability leaders in Kazakhstan are keeping up with the evolving sustainability agenda and are working successfully to incorporate these advances into their ESG Practices in general and into their disclosure practices.

Last year, the average score of the TOP-50 company reports was 5.5 points on a 10-point scale. This year, according to the results of evaluation based on more stringent criteria, the average score was 5.1 points. The average score for the TOP-10 has not changed at all and was 7.4 points, but we must keep in mind that this is actually an increase in the quality of reporting, because the criteria have changed. At the same time, the TOP-50 companies, on average, have the best scores for disclosing their ESG strategy.

In the strategy section, we assess disclosures on the process of identifying material sustainability issues, the existence of goals, as well as stakeholder engagement and integration of the UN Sustainable Development Goals. On average, the TOP-50 companies received 6.3 points for this section of the report, and the TOP-10 - 8 points.

The next level in terms of preparation is the report section on the disclosure of social issues. There are a lot of issues here related to HR management, and this information is often disclosed at a good level. Although it appears to be difficult to disclose information on equal career opportunities and the protection of human rights.

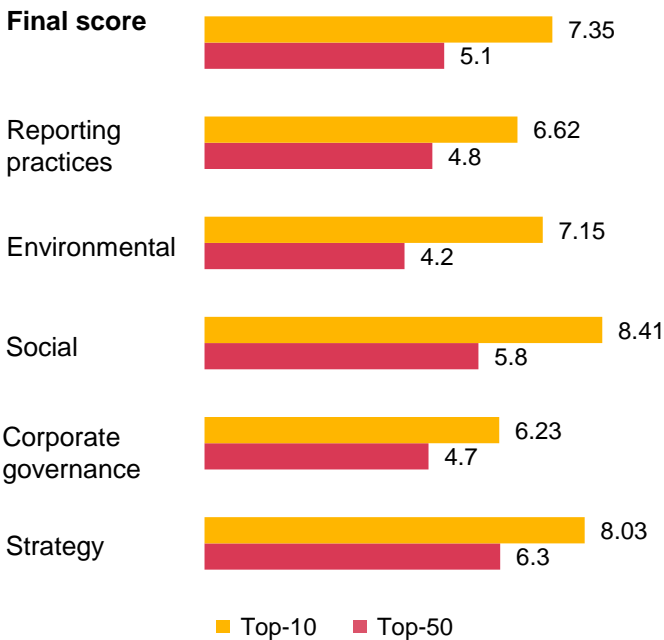
It is also challenging for companies to disclose information related to environmental issues, as can be seen from the average scores. Here, in particular, there is still great potential for disclosing information on climate risks and climate strategy.

The average score for 50 reports on corporate governance was below five points. While many issues have been disclosed properly, the integration of sustainability aspects into the management system can be improved.



ESG strategy disclosure is becoming a strong section of the report

Average scores for the report section



Summary (2/3)



Rating Leaders

The TOP-10 includes companies with a high level of disclosure of ESG Information, even by international standards.

Four companies represent the **oil and gas sector**, the industry clearly succeeding in integrating the principles of sustainability. Two companies represent the **energy sector**, they are the established leaders of our Rating, who have been working successfully on their sustainable development practices for a long time. Another two companies are related to the **mining industry**, one of them represents **telecommunications** and the other one represents the **transport** sector.

Among the leaders are some of the major companies in the Kazakhstan economy, whose activities in managing their impact on the environment and society are of particular importance to the country and for solving the main problems of sustainable development in Kazakhstan.

At the same time, given their size and complexity of processes, ESG Transformation constitutes a serious challenge for these organizations. But so far they are coping well with this challenge and are ready to set an example for other entities in Kazakhstan, and sometimes be an example for industry peers abroad.

The leaders of our Rating swiftly respond to new trends in the global ESG-agenda and work towards sustainable progress.

Rating 2022	Company	Rating
1	NC KazMunayGas	A
2	NAC Kazatomprom	B+
3	QazaqGas	B+
4	Samruk-Energy	B+
5	Karachaganak Petroleum Operating B.V.	B+
6	Kazakhtelecom	B+
7	NC Kazakhstan Temir Zholy	B
8	Altynalmas JSC	B
9	KEGOC	B
10	KazTransOil	B

Summary (3/3)



Second ten

The companies in the second ten are also noticeably better-than-average level in quality, and even if they did not make it into the top ten this year, they are clearly ready to compete with the leaders of the Rating.

Financial sector companies have been especially hardly hit by the tightening of our assessment criteria, which is why many of them moved into the second ten of the ranking. Issues such as sustainable finance, inclusive financial products, managing the impact of a loan and investment portfolio are just beginning to emerge in the Kazakhstani financial sector. However, **four financial companies** from the second top ten of the Rating clearly demonstrate rapid progress in mastering this complex area.

The second ten are also represented by companies in the oil and gas sector (one company), mining (two companies), energy (one company) and transport (one company).

Samruk-Kazyna Managing Holding is also among them. The practice of sustainable development in the Holding companies largely sets the tone for corporate sustainable development in Kazakhstan. In the top ten, eight companies are part of the Holding group, and in the second ten there are two more companies.

At the same time, there are also more private companies in the second ten. While in the first ten there were two of them, the second ten is represented by four private companies.

Rating 2022	Company	Rating
11	Air Astana	B
12	Joint Venture Inkai	C
13	Jusan Bank	C
14	Halyk Bank of Kazakhstan	C
15	Nostrum Oil & Gas	C
16	NMC Tau-Ken Samruk	C
17	Samruk-Kazyna	C
18	NMH Baiterek	C
19	Kazakhstan Development Bank	C
20	CAEP (Central-Asian Electric Power Corporation)	C

Key figures (1/2)



In the general list of rated companies:

96

companies were included in the ESG Information Disclosure Rating

Page 4

7.4

is the average rating of the top 10 reports on a 10-point scale

Page 6

39

companies declared their adherence to the GRI Standards in the disclosure of non-financial information

Page 43

42

companies stated in their Reports their support for the UN Sustainable Development Goals

Page 13

11

companies obtained external assurance of non-financial information

Page 43

Key figures (2/2)



Out of TOP-50 companies:

30%

Have sustainable development goals

Page 12

84%

Describe the stakeholders engagement processes

Page 12

50%

Describe the sustainability governance structure

Page 37

66%

Address the topic of human rights protection

Page 28

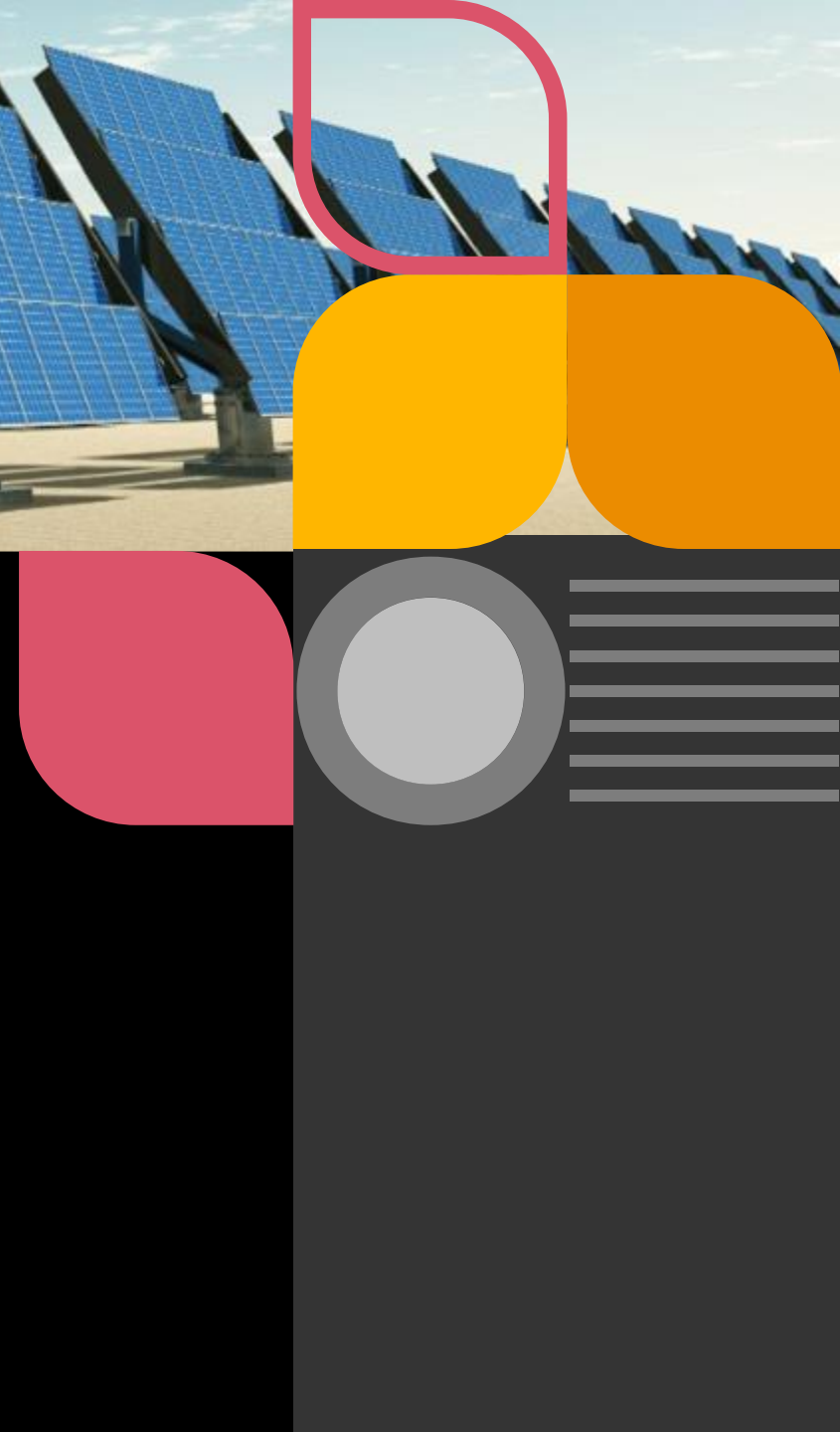
38%

Disclose Scope 1 and Scope 2 greenhouse gas emissions

Page 19



1 ESG Strategy



How does the company manage sustainability risks?

This is the fourth edition of the ESG Disclosure Rating and we have repeatedly stressed the importance of a well-developed ESG strategy not only for reporting, but also for the ESG Transformation of the organization as a whole. The situation has not changed, on the contrary, the strategic vision regarding issues of sustainable development is becoming increasingly important. We see this in new non-financial reporting standards (for example, those proposed by the ISSB or CSRD), and the ESG Ratings assessment criteria.

The first step of ESG Transformation is **to identify ESG material topics**, that is, the environmental and social issues that a company should focus on, its strategy, and its report. In this regard, the question of what is considered to be material is the first one to be answered, and the answer to the question is not obvious. For many years, we have generally considered issues where a company has the greatest impact on the environment, society and the economy to be material. And today, we are increasingly seeing the use of a risk-based approach (including within the framework of new reporting standards).

It is becoming increasingly common that regulators, investors, rating agencies, and organizations consider **ESG Risks** that can impact an organization in the long term. We first talked mostly about the risks associated with climate change, but companies are now increasingly expected to be able to monitor and manage a wide range of environmental, social and governance risks. In Appendix 1 to this Report you will find a little more information about how this work can be approached. For many organizations, dealing with ESG risks, according to our observations, is becoming a serious challenge. The lack of a history of risks, a long-term horizon, the difficulty of quantifying potential impacts and other problems result in the necessity for companies to design a new ESG risk management process.

In the future, after identifying ESG risks, the company will have to make sure that its ESG Strategy, as well as the corporate strategy as a whole, takes into account these risks and is adapted to them.

The next step, after assessing the ESG material topics, will be to **set verifiable long-term goals and develop a system of key performance indicators (KPIs)** by which management will monitor the progress of the work being carried out.

We are often faced with situations where work in the field of sustainable development does not lead to obvious results, - the company cannot articulate and present its achievements in the report so that these results could be obvious to stakeholders. Having clear goals and metrics to measure progress helps to solve this problem. Now both the company's management and stakeholders can see the progress and results achieved. Today, it is not enough to simply list implemented projects for a quality ESG report. What are our main environmental and social impacts? What risks may affect us? What is our action plan? What are the results in the reporting year? These are the key questions to be covered in the ESG report in order to be considered as the best practice.

Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

Strategy

In 88% of reports included in the TOP-50 of ESG Information Disclosure Rating, **an organization's statement about the importance of sustainability issues** and a brief description of approaches to this work was provided. For many Kazakhstani organizations of various sizes and representing different sectors of the economy, sustainability issues have not been new for a long time and are actively being introduced into their business model. We can observe that this practice has become more and more established and with a higher level of granularity.

The majority of companies in the TOP-50 (74%) reported **material sustainability topics**, which are primarily based on assessing the organization's environmental, social and economic impacts. This is clearly a marked improvement and it can be said that impact assessment is becoming a common practice.

Assessment of **ESG risks** for organizations is new, but here again many companies immediately got involved in the work. About a third of the reports already include a description of the approach to managing sustainability risks and provide a list of ESG risks.

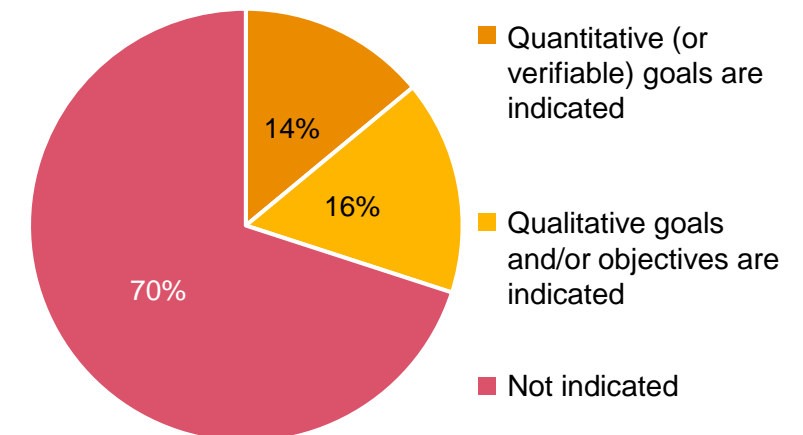
Disclosing a sustainability **strategy** remains challenging. So far, 30% of companies disclose quantitative or qualitative goals for strategic ESG topics, enabling stakeholders to track the organization's progress, and see where it intends to move. Even for the reports of TOP-10 companies there is potential for further development in this area.

Another critical aspect of a successful ESG transformation is understanding the interests of the **organization's key stakeholders**. And in this area, reports from Kazakhstani companies have also made considerable progress. There is a description of key stakeholder groups in 86% of reports in the TOP-50, and 84% of reports describe processes for engaging with them. It is also good practice to indicate what actions were taken in response to issues raised to meet the interests of a particular stakeholder group. In the one-fifth of the TOP-50 reports it is disclosed what the organization has done for a specific group of stakeholders.

34% provide a list of ESG risks that may have an impact on the organization

22% describe an approach to sustainability risk management

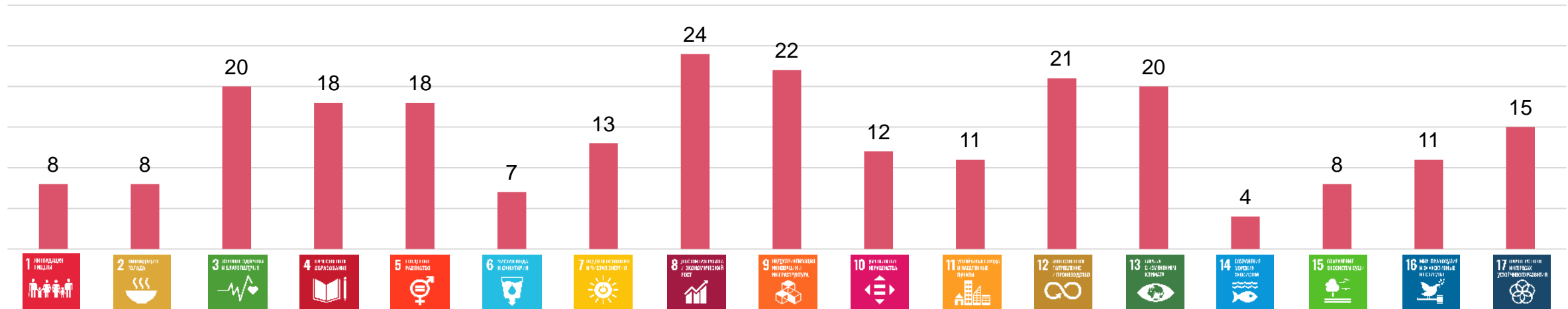
Disclosure of sustainable development goals



Current practice (2/2)

Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

Number of companies that made a reference to a specific UN Sustainable Development Goal



Sustainable Development Goals

Now, in fact, two-thirds of the reports in the Rating contain information about the companies' work on the global Sustainable Development Goals adopted at the UN Summit in 2015. The alignment of the organization's work with the global sustainable development agenda and participation in solving the main problems of modern society is a crucial indicator of a successful ESG transformation.

So far, the most popular goals from the UN list are economic goals, especially Decent Work and Economic Growth. Climate Action is slightly behind the economic goals, which is quite expected, given the (deserved) attention this problem enjoys today. But we also see that certain social issues have been the focal point of Kazakhstani companies, in particular issues of health, education and gender equality.

64% of companies declared support for the UN SDGs (56% in Reports for 2021)

68% showcased a list of SDG Goals relevant to their business, and which the company intends to work on (50% in Reports for 2021).

42% described initiatives aimed at achieving specific goals (24%).

What to focus on in the next report

Sustainability risks

A number of Kazakhstani companies, in one form or another, have already begun to highlight issues of managing sustainability risks in their reports. However, there is still a significant development potential for many companies in this section.

The first issue that is worth drawing attention to is the identification and description of ESG risks in the report. These risks should be highlighted separately. It is assumed that the company has made a dedicated effort to study, identify and assess sustainability risks and present them in the report. At the same time, a quantitative assessment should be carried out, in particular, indicating the potential impact on financial performance.

The second significant section of information is the sustainability risk management system. The best reports will contain a description of how such risks are identified, assessed, monitored, etc., and how these processes are integrated into the overall risk management system of the organization.

Adapting the strategy

Apart from the fact that report users expect to see the company's specific and results-oriented sustainability plan (strategy), nowadays this issue is being increasingly considered from a sustainability risk management perspective.

How does the organization's strategy address the specific environmental and social risks that may affect it in the short-, medium-, and long term? The answer to this question can be found both in separate areas of the strategy dedicated to issues of sustainable development, and in adjusting the usual commercial parts of the strategy.

The report will also contain information on the progress in the implementation of plans disclosed by the organization in previous reporting periods, including quantitative and qualitative information. Users will be able to see the consistent development of the entity. A key element of success will be a well-developed system of metrics and goals to track progress.

Value chain

An important trend we observe today in developing reporting standards (e.g. CSRD) and in the expectations of information users is the broadening of reporting to include information about the entire value chain of a particular entity.

When assessing sustainability risks, selecting significant impacts, and identifying strategic areas, it is important to consider the entire value chain, from production and supply of raw materials to the end use of products. The entity's activities, on their own, are incomplete and do not answer the question of their environmental and social impacts.

At the same time, there is a lot of work to be done to determine the scope for each specific indicator, the applicability of its disclosure and its depth. However, in general, when preparing a report and drafting a sustainability strategy, it is important to look at your business model more broadly and make decisions taking into account the processes that occur before and after the entity's direct operations.

Examples of disclosures

ESG Strategy

In its [Sustainability Report](#), **UPM** discloses current progress in achieving its ESG goals for 2030 across economic, environmental and social responsibility. The company also indicates specific key performance indicators.

OUR RESPONSIBILITY TARGETS FOR 2030			
Focus area	Key performance indicator	2030 target	2022 result
ECONOMIC			
Profit Creating value to shareholders	<ul style="list-style-type: none"> Comparable EBIT Comparable ROE Net debt/EBITDA 	<ul style="list-style-type: none"> Comparable EBIT growth through 6 growth areas 10% (con) 2 times a 	<ul style="list-style-type: none"> 42% increase to EUR 2,096 million
Governance Ensuring accountability and compliance	<ul style="list-style-type: none"> Participation in UPM Code of Conduct training 	<ul style="list-style-type: none"> 100% (con) 	
Responsible sourcing Adding value through responsible business practices	<ul style="list-style-type: none"> UPM spend covered by UPM Supplier and Third-Party Code UPM raw material spend covered by UPM Supplier and Third-Party Code Supplier auditing based on systematic risk assessment practices 	<ul style="list-style-type: none"> 80% (con) 100% Continuous 	
ENVIRONMENTAL			
Forestry Ensuring sustainable land use	<ul style="list-style-type: none"> Climate-positive land use in UPM's own and leased forests Share of certified fibre¹ 	<ul style="list-style-type: none"> Forests as (continuous) 100% 	
Biodiversity Enhancing biodiversity	<ul style="list-style-type: none"> Positive impact on forest biodiversity and developing a monitoring system¹ Obstacle-free streams¹ 	<ul style="list-style-type: none"> Positive (continuous) 500 km 	
Climate Creating climate solutions and working towards carbon neutrality	<ul style="list-style-type: none"> Fossil CO₂ emissions from UPM's on-site combustion and purchased energy (Scope 1 and 2), compared to 2015 Coal and peat usage in on-site energy generation Annual energy efficiency improvement Share of renewable fuels Acidifying flue gases (NO_x/SO_x) for a UPM average product, compared to 2015 	<ul style="list-style-type: none"> -65% 0 1% (con) 70% (con) -20% 	
Water Using water responsibly	<ul style="list-style-type: none"> Chemical oxygen demand (COD) for a UPM average product, compared to 2015 Wastewater volume for a UPM average product, compared to 2015 Nutrients used or effluent treatment from recycled sources¹ 	<ul style="list-style-type: none"> -40% -30% 100% 	
Waste Promoting material efficiency and circular bioeconomy – reduce, reuse, recycle and recover	<ul style="list-style-type: none"> Process waste sent to landfill or to incineration without energy recovery 	<ul style="list-style-type: none"> 0 	
Product stewardship Taking care of the entire lifecycle	<ul style="list-style-type: none"> Climate-positive product portfolio Development of new products and services with contribution to the SDGs Share of applicable products eligible for ecolabelling out of UPM sales 	<ul style="list-style-type: none"> Continuous Continuous 100% 	
SOCIAL			
Continuous learning and development Enabling continuous professional development for high performance, growth and future employability	<ul style="list-style-type: none"> Goal setting discussions are held and development plans are created for employees Employee perception of good opportunities to learn and grow 	<ul style="list-style-type: none"> 100% completion rate Clearly above benchmark 	<ul style="list-style-type: none"> 83% (88%) of employees completed individual goal setting or annual discussion, 58% (70%) of employees had a development plan documented In the Employee Engagement Survey average score of 64 (62). Below global average benchmark by 8 points.
Responsible leadership Emphasizing value-based and inspiring leadership and integrity	<ul style="list-style-type: none"> Employee engagement 	<ul style="list-style-type: none"> Clearly above benchmark 	<ul style="list-style-type: none"> In the Employee Engagement Survey average score of 70 (68). Below global average benchmark by 5 points.
Diversity and inclusion Developing an organisational culture and workplace to ensure a diverse and inclusive working environment for business success	<ul style="list-style-type: none"> Employees' sense of belonging Continuous improvement in female representation in professional and managerial roles. Developing leadership and decision-making capabilities with increased diversity Diversity and inclusion initiative 	<ul style="list-style-type: none"> Among the top 10% of benchmark companies 40% female representation Continuous 	<ul style="list-style-type: none"> In the Employee Engagement Survey average score of 68 (67). Below top 10% benchmark companies by 12 points. 31.4% (30.7%) Dialogue continued on developing inclusive behaviours and a learning on LG8 TIQ+ inclusive workplace launched. A gender pay equity review process implemented.
Fair rewarding Ensuring fair, equitable and competitive rewarding for all employees	<ul style="list-style-type: none"> Employees' pay meeting at least local living wage; implementing a yearly review Gender pay equity for all employees; implementing a yearly review process to identify and close unexplained pay gaps 	<ul style="list-style-type: none"> Continuous Continuous 	<ul style="list-style-type: none"> Company-wide review done and pay adjustments implemented to close identified pay gaps related to local living wage Company-wide review done and pay adjustments implemented to close identified, statistically significant and unexplained gaps related to gender
Safe and healthy working environment Ensuring the safety and health of our employees, contractors and the local communities close to our operations	<ul style="list-style-type: none"> Fatalities or serious accidents in UPM operations Total recordable injury frequency (TRIF), including contractors Process safety integrated in safety management Employees' sense of workplace balance Absenteeism rate 	<ul style="list-style-type: none"> 0 (continuous) <2 All sites and businesses Among the top 10% of benchmark companies <2% 	<ul style="list-style-type: none"> 3 (0) fatal accidents, 5 (3) serious accidents TRIF 6.4 (6.3) for UPM workforce and 5.9 (7.2) including contractors Process safety standard published In the Employee Engagement Survey average score of 70 (70). Below top 10% benchmark companies by 7 points. 4.5% (4.1%)
Community involvement Ensuring local commitment and positive impact on communities	<ul style="list-style-type: none"> Assessment of quality of community relationships and define measures at relevant sites Long-term initiative(s) that impact their mill communities defined in line with the Before Share and Care programme 	<ul style="list-style-type: none"> Continuous All businesses (continuous) 	<ul style="list-style-type: none"> Community engagement model redefined and piloted in Uruguay Focus on providing aid for people suffering from the war in Ukraine

Achievement of the UN Sustainable Development Goals by **Verizon** can be tracked by specific SDGs, related targets, as well as the company's own goals and progress this year in a separate section of their [ESG-Report](#).

Our UN SDG-aligned goals and progress			
UN SDG targets	Verizon goals	Progress	
4. QUALITY EDUCATION 4.4: By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship	<ul style="list-style-type: none"> By 2030, provide 10 million youths with digital skills training By 2030, prepare 500,000 individuals for jobs of the future 	<ul style="list-style-type: none"> Over 3.1 million youths provided with digital skills training¹⁷ Over 21,000 individuals prepared for jobs of the future 	
7. AFFORDABLE AND CLEAN ENERGY 7.2: By 2030, increase substantially the share of renewable energy in the global energy mix 7.3: By 2030, double the global rate of improvement in energy efficiency	<ul style="list-style-type: none"> By 2030, source renewable energy equivalent to 100% of our total annual electricity consumption Achieve net zero emissions in our operations (scope 1 and 2) by 2035 	<ul style="list-style-type: none"> Approximately 3.3 GW of anticipated renewable energy capacity under contract¹⁸ 19% reduction (market-based) in 2021 over a 2019 baseline 	
8. DECENT WORK AND ECONOMIC GROWTH 8.3: Promote development that support productive activities, entrepreneurship, innovation, and encourage the growth of micro-, small-sized enterprises, including financial services 8.4: Improve progressively, the global resource efficiency in production and endeavor to economic growth from environmental degradation, in accordance with a framework of programmes on consumption and production countries taking the lead 8.5: By 2030, achieve full employment and decent work for men, including for young persons with disabilities, and work of equal value	<ul style="list-style-type: none"> By 2030, reduce Verizon's absolute scope 1 and 2 emissions 53% over a 2019 baseline By 2035, reduce Verizon's absolute scope 3 emissions 40% over a 2019 baseline By the end of 2026, enroll 50% of Verizon's workforce as Green Team members 	<ul style="list-style-type: none"> 19% reduction (market-based) in 2021 over a 2019 baseline 10% reduction in 2021 over a 2019 baseline 49% of employees are Green Team members 	
13. CLIMATE ACTION 13.2: Integrate climate change into national policies, strategies and planning 13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	<ul style="list-style-type: none"> By 2030, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements 	<ul style="list-style-type: none"> By the end of 2030, sponsor the planting of 20 million trees globally 	
15. LIFE ON LAND 15.1: By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements	<ul style="list-style-type: none"> By the end of 2030, sponsor the planting of 20 million trees globally 	<ul style="list-style-type: none"> Nearly 14 million trees planted since 2009 	
16. PEACE, JUSTICE AND STRONG INSTITUTIONS We are aiming to promote inclusive societies where the rights of all people are respected and where rule of law is observed, through our corporate actions, policy development, donations and employee volunteering. We have taken steps to identify and manage our human rights impacts, established comprehensive policies, processes and systems to address corruption and bribery; and through our advocacy, volunteering and financial donations supported issues including criminal justice reform and efforts to fight online child exploitation.			

Examples of disclosures

ESG Strategy

Sustainability risks of **SKF** are paid special attention among other risks in the 2022 [Annual Report](#). In addition to describing risk mitigation measures, there has been a trend toward increasing/decreasing exposure to these risks in the company.

Risk	Trend	Mitigation
A major incident at an SKF facility causing environmental damage leading to fines and loss of reputation.	↓	SKF's environmental certified to ISO 14001 all such material risk effective countermeasures to mitigate them.
Water scarcity in the supply chain or at SKF facilities leads to reduced production.	↑	SKF facilities which water scarcity are required reduction programs suppliers follow environmental certified
Extreme weather events.	↑	Requirements for environmental at all sites include fire information, see SKI at skf.com/ar2022 .
Increased energy and other environmental costs due to legislation.	↑	SKF focuses on energy facilities and supply demand and therefore information, see SKI skf.com/ar2022 .

Risk	Trend	Mitigation
SKF employees or employees working in the supply chain, are hurt or killed by an accident at work.	↓	SKF's Health and Safety management system is certified to ISO 45001. The Group's zero accident program, supported by proactive near miss reporting, aims to avoid all workplace accidents. Within the Code of Conduct for suppliers, SKF has defined specific requirements for the assurance of health and safety for the employees of suppliers and sub-suppliers.
A person or persons are hurt or injured because of SKF product failure, malfunction or defect.	↓	SKF follows strict design and validation rules for all products, and fully adheres to industry specific requirements for safety critical applications. SKF provides detailed instructions on the correct use, fitting and application of products. SKF's overall approach to quality management assures product conformity and performance to the highest level.
Human rights of employees working at SKF or within the supply chain are not respected.	↓	SKF adheres to international standards and guidelines and enforces the SKF Code of Conduct policy in all its operations. Periodic code of conduct compliance audits are performed and a whistleblowing process is available at local and global levels.

Santander in its [Non-financial Report](#) indicates risks and opportunities in three ESG areas, and also describes their actual and potential effects.

	Risk and opportunities	Real and potential impacts
Environmental	<p>The environmental, economic and social effects of climate change can potentially lead to financial loss.</p> <ul style="list-style-type: none"> Physical risk of customers' assets and businesses being damaged due to their location. Transition risk that stems from how customers react to policies, new technology, market shifts and our climate change response. 	<p>Physical risk impact:</p> <ul style="list-style-type: none"> High impact: Rising costs if customers' assets are damaged or lost value as a result of hurricanes, floods, heatwaves and other extreme weather events. Chronic impact: Customers' potential loss of income in the long-term due to rising sea levels, higher average temperatures and other consequences of climate change. <p>Transition risk impact:</p> <ul style="list-style-type: none"> Carbon pricing: Rising costs of emissions that cause operating costs to rocket for customers in CO2-intensive industries. Shift in demand for our products and services, which would affect our bottom line.
Social	<p>The transition to a low-carbon economy opens up opportunities in "green" products, sustainable finance and customer advisory services.</p> <p>For more details see 3.6 Supporting the green transition section in this chapter; and 10. Climate and environmental risk section in Risk management and compliance chapter.</p> <p>Customers' lower purchasing power could lead to greater risk of default.</p>	<ul style="list-style-type: none"> Offer sustainable finance and create products to meet the current needs of our customers and attract new ones. Position Santander as a sustainable and responsible bank. Losses due to debtors' inability to pay. Drop in profits if customers feel the bank is not doing enough to tackle social issues.
Financial health & inclusion	<p>Financial inclusion initiatives developed to make our services available to underserved communities and boost economic and social progress.</p> <p>For more details see 3.8 Financial inclusion and empowerment section in this chapter.</p> <p>Failure to adapt to new ways of working and poor management of our people could lead to a loss of talent or a disengaged workforce.</p>	<ul style="list-style-type: none"> Tailor-made financial products and services to help people prosper. A sound strategy and social purpose that positions Santander as a bank people can trust. Lack of pride to be part of Santander can harm profitability. Need to boost knowledge and skills amid constant changes to the environment and ways of working. Questionable succession plans and leadership due to a failure to attract and retain talented professionals.
Quality employment	<p>A skilled and motivated team boosts business performance and customer service.</p> <p>For more details see 3.9 A talented and motivated team section in this chapter.</p>	<ul style="list-style-type: none"> An engaged workforce can increase customer loyalty and help attract new customers. Retaining diverse talent makes overcoming challenges easier and leads to better results. Santander's scale means we can develop top employees in all the markets where we operate.
Governance	<p>Market instability, current competitive environment, more regulation and higher cybersecurity risk can hamper Santander's operations and performance.</p> <p>Good governance and proper adaptation to a changing environment to ensure business continuity and stakeholder loyalty.</p> <p>For more details see Business model and strategy, Corporate governance and Risk management and compliance chapters.</p>	<ul style="list-style-type: none"> Less capacity to generate liquidity and capital and to enhance our operations in a testing environment. Losses on the back of breaches of information due to cyber attacks and fraud. Fines for malfeasance. Business continuity and sustainable profit generation with a strong balance sheet. Positive stakeholder perception of Santander to avoid reputational risk.
Responsible management and business development		



2

[E]nvironment

Approach to disclosure

[E]nvironment

To what extent is the company aware of its environmental impact?

Of all the environmental issues, climate change and the assessment and management of risks associated with climate change have clearly been the subject of concern over the past few years. There are solid reasons for this. Global warming and the fight against it is an enormous problem, affecting in addition to environmental aspects, also social and economic ones. This problem requires significant resources and participation of business, government and society. But at the same time, today it is increasingly perceived that other, and no less important, environmental problems remain in the background, which should also be given attention in the work of the organization and its development strategy.

In this regard, the establishment of a Task Force on Nature-related Financial Disclosure (TNFD) is no coincidence. The group released final recommendations in 2023 on managing and disclosing the dependencies, impacts, risks and opportunities associated with nature. As part of these recommendations, companies will have to understand the interplay between their business and nature.

The TNFD Recommendations follow the same principles as the TCFD Recommendations, according to which climate change risks and opportunities were disclosed. The structure is the same here: Governance, Strategy, Risks and Metrics. However, within TNFD we consider a significantly broader range of environmental issues, and in addition to the risks that may affect our activities, we also assess our impacts on and dependencies on ecosystems. This “dual materiality” principle will enable companies to make a significant contribution to solving environmental problems and preserving biodiversity. But in many respects, this is a return to the approach that we used to take in sustainability reporting, before we focused entirely on climate change issues. Perhaps only the approach has become more detailed.

Even if an organization does not plan to switch to TNFD, such a broad visibility into nature-related impacts and risks, with disclosure of information about the management of these impacts, will help significantly improve the quality of ESG disclosure and take the Environment section to the next level.

Working with impacts on nature and disclosure of information on such issues requires a deeper dive into Biology, understanding the laws of nature, elements of ecosystems, the significance of biodiversity, introducing concepts such as natural assets and services, etc. into everyday use. We all have to begin to understand environmental issues to some extent. But we already have experience, many of us have a sufficiently good understanding of the climate change, which just a few years ago was a very abstract concept.

Knowledge of ecology may in the future become a basic necessity for building and developing a business.



Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

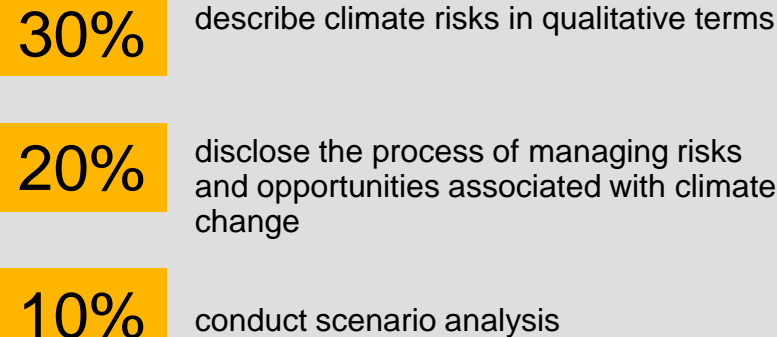
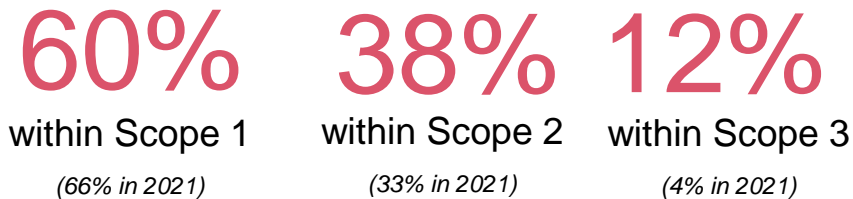
We see that Kazakhstani companies included in the TOP-50 are gradually getting involved in activities related to climate change issues and working on climate strategies.

This year, approximately 25-35% of companies in the Rating began to disclose in their reporting **processes for managing risks and opportunities related to climate change**.

Risks have not yet been quantified, however, companies have completed their identification. In some cases, the use of scenario analysis is described.

At the same time, the practice of disclosing information on **greenhouse gas emissions** is not improving. As in the past year, two thirds of the companies in the TOP-50 disclosed information about direct emissions (Scope 1). However, the level of granularity is increasing, and we see that more companies have begun to disclose information about indirect greenhouse gas emissions - for Scope 2 (energy) and in some cases for Scope 3 (other indirect emissions).

The volume of greenhouse gas emissions for the last reporting year was disclosed by:



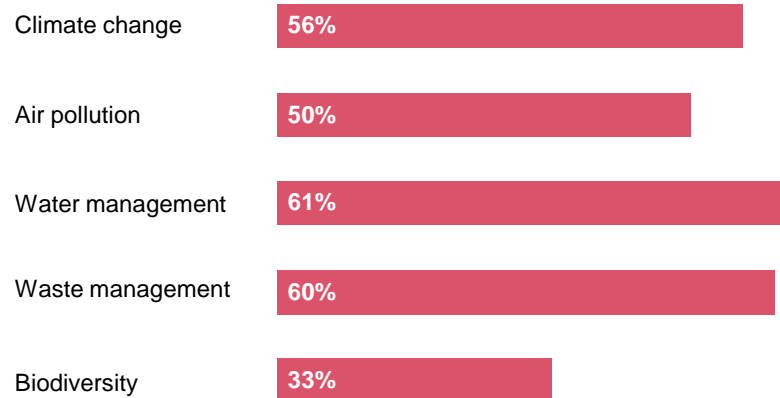
Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

This year, we added management of aspects of sustainable development, including environmental issues, to the evaluation criteria. We looked at a description of management approaches, as well as whether there was a strategy for a specific topic and a description of the work being done to mitigate adverse environmental impacts. At the same time, we assessed these factors only for companies for which one or another environmental topic is significant.

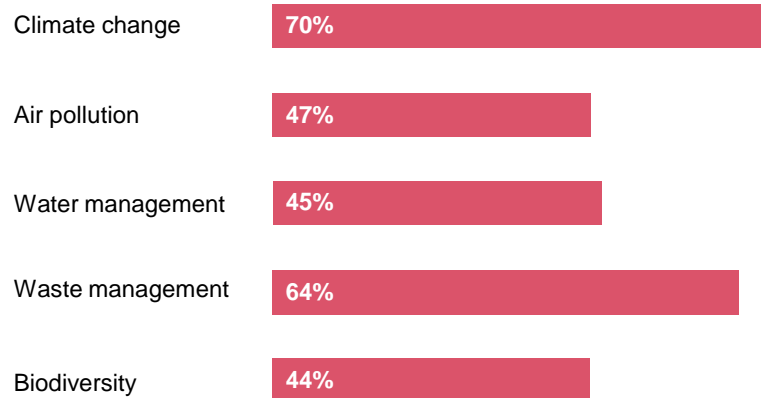
We see that the management of climate-change related issues is the most common practice. The majority of companies are making considerable efforts to reduce their impacts, with about a third taking a strategic approach to setting out their goals and objectives. Much attention is also often paid to waste management issues. While the issues of impact on biodiversity remain one of the most neglected areas.

Often, companies describe their approach to managing a designated aspect of environmental impact, and are eager to talk about the work carried out in this area. The potential for further development is to disclose goals and objectives for each individual aspect of sustainable development, indicating how the company (using what metrics) monitors progress.

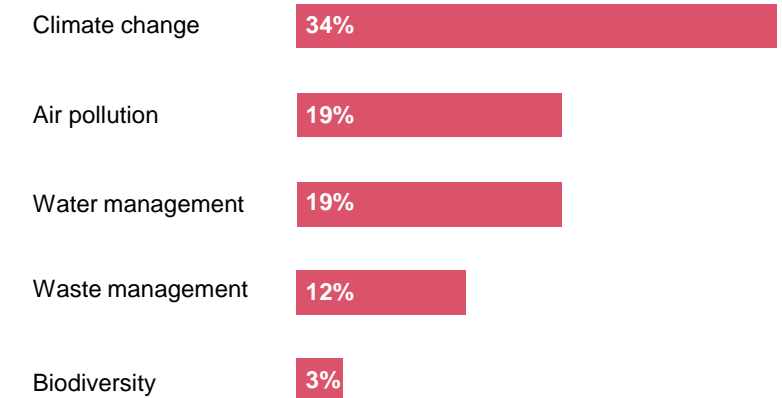
Percentage of companies describing an approach to aspect management:



Percentage of companies describing efforts to mitigate adverse impacts:



Percentage of companies describing goals and progress metrics by the aspect:



What to focus on in the next report

Management approaches

Providing a description of approaches to managing specific material aspects of sustainability has always been an essential element of a good sustainability report. But now, judging by the development of reporting standards (e.g. CSRD, IFRS S1/S2, GRI), management issues are given particular importance, and the expectations from these disclosures continue to increase.

Management approaches for each material topic will include a description of the impacts on ecosystems and/or society for that specific aspect of sustainable development. They will also include a description of policies and commitments in this aspect and the work being carried out to mitigate adverse impacts.

An important element of these disclosures would be information about how the company tracks the progress of its work: the process for tracking progress, the goals and metrics used to measure progress, the effectiveness of actions taken, and the lessons learnt.

These disclosures are included in almost all evolving standards of non-financial reporting.

Climate strategy

Disclosing information of a company's activities to combat and adapt to climate change will continue to be an important element of a good ESG report and an entity's overall sustainability practices. It is no coincidence that when drafting new standards, the ISSB dedicated a separate standard to climate-related risks.

The emphasis here remains on disclosing the risks and opportunities associated with climate change: how the company identifies and assesses such risks, what risks have been identified, and how they are managed (including the role of the organization's senior management).

The substantive work of the organization will be focused on reducing greenhouse gas emissions. The first step of this process is to assess emissions. The important thing here is to include Scope 3, tracking emissions along the supply chain. This will be a crucial element for further development of climate strategies.

Having emissions reduction targets, which in the ideal case had been aligned with SBTi, will distinguish the most successful companies.

Other environmental issues

It is important to recall once again and pay attention to other environmental issues in addition to greenhouse gas emissions.

The key point here (and the most difficult for most organizations) is to track and then report on the most significant impacts on ecosystems. In particular, many non-financial organizations have quite significant impact on biodiversity, but rarely disclose this information because they find it difficult to determine the nature and extent of such impact.

Identifying intersections with ecosystems, measuring dependencies and impacts, assessing the risks and opportunities associated with nature, preparing a response to these risks and impacts are the four main steps that should become part of the organization's sustainable development practices, and will be further disclosed in the reporting.



[E]nvironment

The Annual Report of **Barclays** provides stakeholders with information on the financial impacts of climate change based on an analysis of three climate scenarios.

Climate Risk driver / Risk Types	Strategic	Credit	Market	Liquidity	Operational	Reputational
Acute physical	Medium	High	Low	Low	Very High	Low
Chronic physical	High	Very High	Low	Low	Medium	Low
Transition risk: policy changes	Very High	Very High	High	Low	Low	Low
Transition risk: technology changes	Medium	Very High	Low	Low	Low	Low
Transition risk: behavioural changes	Very High	Very High	Low	Low	Low	High
Other environmental risk drivers	Low	High	Low	Low	Low	High
Governance drivers	Medium	Low	Low	Low	Low	Low
ESG-related liability consequences	Medium	Low	Low	Low	High	Low

Most Material Very High High Medium Low Least Material

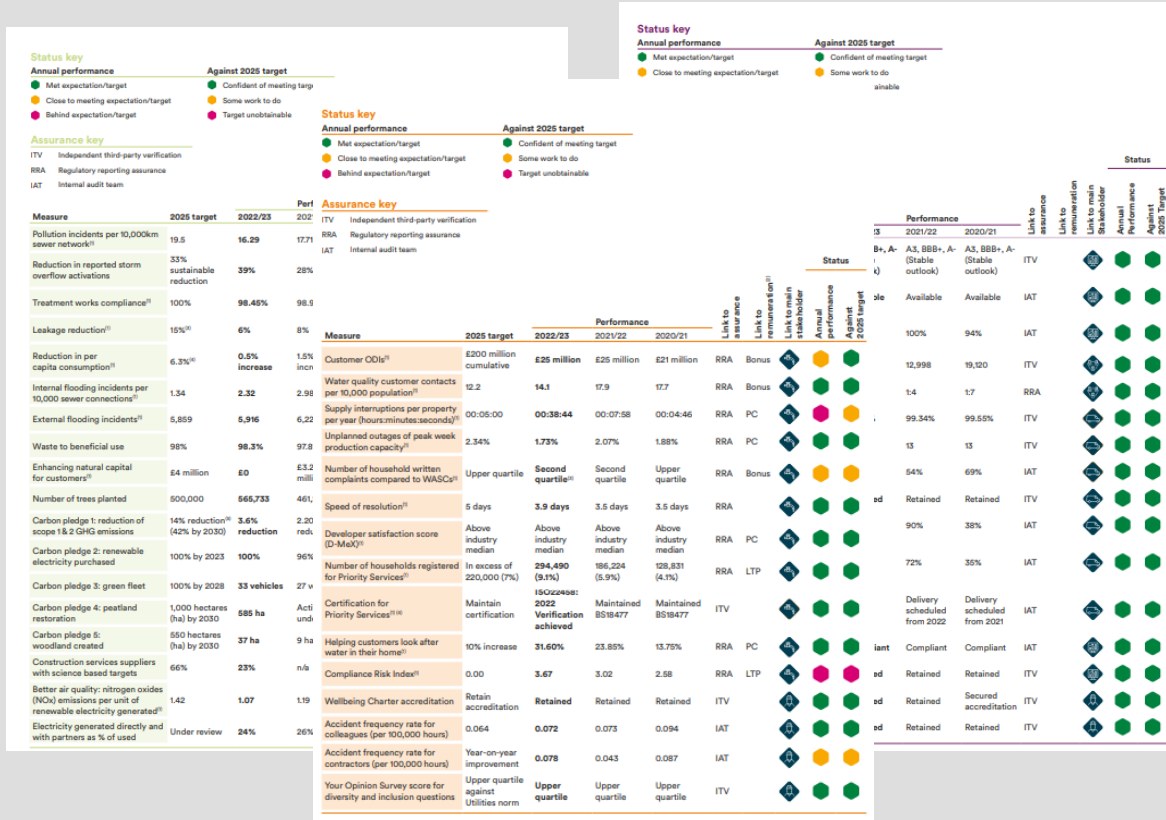
Source: <https://www.bankofengland.co.uk/2022/results-of-the-2021-climate-biennial-exploratory-scenario>

Examples of disclosures

[E]nvironment

Achievement of goals and corresponding KPIs across the three ESG pillars is easily tracked in the **United Utilities Report** with clear infographics, as well as comparisons of progress over the past 3 years.

The **KPO Sustainability Report** contains specific goals, actions taken, progress status and targets for the next year for each material ESG topic.



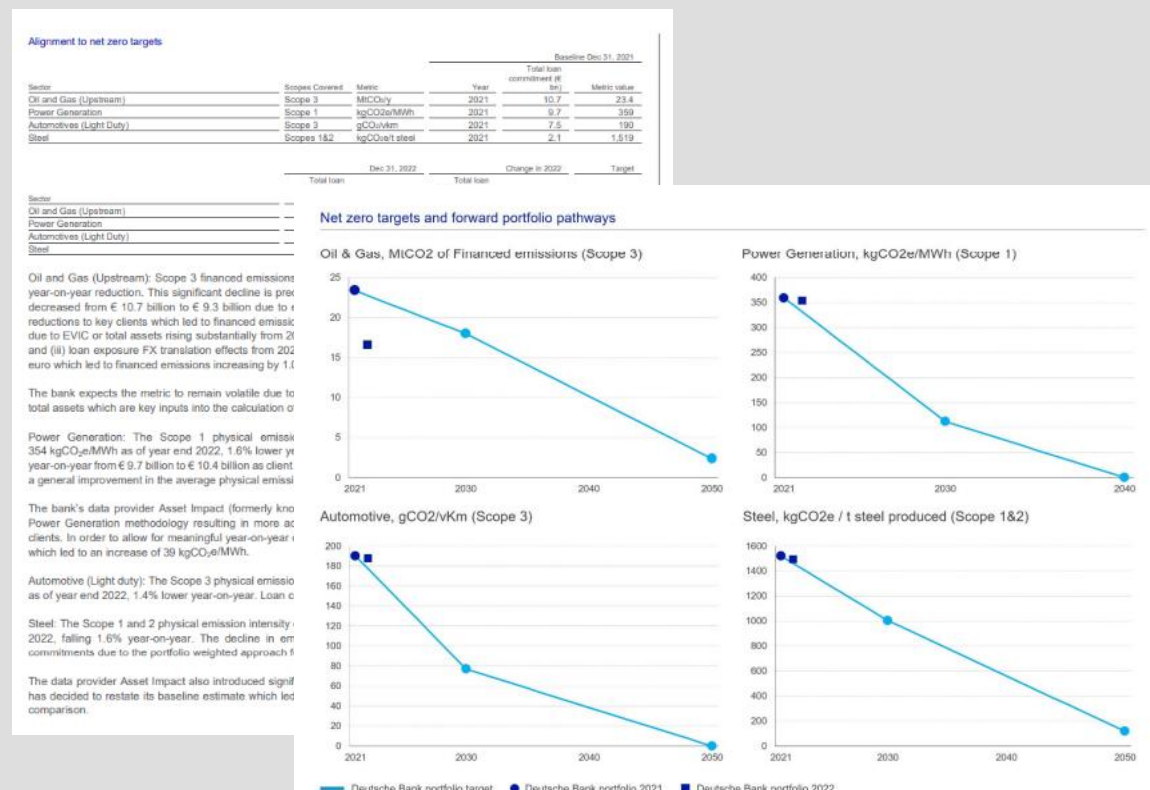
[E]nvironment

The **Samruk-Energy Integrated Report** provides information on the approach to responsible water use, the nature of impacts and specific actions to conserve water resources.

[illegible]

Examples of disclosures

The [Annual Report](#) of **Deutsche Bank** provides the bank's goals for reducing financed emissions for each industry and presents the dynamics of achieving the stated goals.



Halyk Bank of Kazakhstan in its [Sustainability Report](#) discloses and describes the exposure of its banking portfolio to climate risks.

Влияние на портфель КБ

Банк осознает уязвимость важнейших инфраструктурных отраслей Казахстана перед природными стихийными явлениями, частота и интенсивность которых увеличиваются в результате изменения климата, с потенциально существенными последствиями для основных секторов и экономики/портфеля в целом.

Автомобильные и железнодорожные логистические пути часто страдают из-за сильных ветров и снегопадов, а также из-за наводнений и лесных пожаров, что усугубляется неудовлетворительным расчетом размеров и плохим содержанием дренажных сооружений¹⁰. Результаты экспертных оценок показывают, что примерно 10 процентов транспортной инфраструктуры Казахстана подвержено воздействию опасных природных явлений, особенно наводнений. Между тем уровень Каспийского моря, по-видимому, снижается, что влияет на деятельность морского транспорта, функционирование внутренних береговых портов и на степень интермодальной связности. Перебои в транспортном сообщении нарушают связность городов и регионов, препятствуют персональной мобильности и негативно влияют на глобальные стоимостные цепочки и структуру международной торговли. Эти нарушения, а также воздействия на другую инфраструктуру обеспечения связности, в частности в сфере электроснабжения, газоснабжения и телекоммуникаций, приводят к существенным экономическим потерям.

Суровые погодные явления могут нанести ущерб или разрушить уязвимую инфраструктуру, что приведет к экономическим и человеческим потерям. Национальные метеорологические отчеты содействуют защите инфраструктуры и промышленности от стихийных бедствий, а как сценарии изменения климата обеспечивают руководство по размещению и климатической защите инфраструктуры в прибрежных и других уязвимых к климату районах. Дефицит водных ресурсов будет особо острой проблемой для отраслей тепловой генерации электроэнергии и сельскохозяйственного сектора Казахстана, повышая риски для уязвимых сообществ в сельских районах страны.

Лесные пожары могут нарушить работу транспорта, связи, электроснабжения, газоснабжения и водоснабжения. Они также приводят к ухудшению качества воздуха и потере имущества, урожая, ресурсов, животных и людей. За 2021 год зафиксировано 751 случай лесных пожаров, когда как в 2022г. уже 801 случай лесных пожаров. Ущерб государству также вырос с 9,3 млрд тг. до 20,6 млрд тг.¹¹

В сельском хозяйстве доминирующая роль принадлежит выращиванию пшеницы в неорошаемых условиях и животноводству, а эти сектора будут уязвимы для изменений в количестве и равномерности выпадения дождевых осадков. Повышение засушливости вегетационного периода на 5-15 процентов и сопутствующее увеличение частоты

возникновения засух относятся к наиболее существенным негативным последствиям изменения климата для сельского хозяйства. Урожайность яровой пшеницы к 2030 году может снизиться на 13-37 процентов, а к 2050 году – на 20-50 процентов. Повышение температур и неточность прогнозов могут привести к потере 50-70 процентов урожаев в регионе Центральной Азии в целом.¹²

Животноводство также будет существенно затронуто изменением климата. Ожидается, что пастбища станут гораздо менее продуктивными и в результате снизится их потенциал по поддержанию текущего поголовья скота. Ожидается, что урожаи пастбищных трав снизятся на 10-25 процентов на равнинных пастбищах и на 30-40 процентов на горных пастбищах. Кроме негативного воздействия в виде истощения пастбищ, из-за удлинения периодов жаркой погоды еще больше сократится поголовье скота.

Переходные климатические риски в Казахстане

В рамках достижения углеродной нейтральности (УН) Казахстаном к 2060 году была поставлена цель ОНУВ в виде 15%-ного снижения выбросов ПГ от уровня 1990 года в 2030м. С учетом текущего экономического роста национальной экономики и связанных выбросов ПГ, указанная цель создает существенные риски для бизнеса, связанные с углеродным регулированием и ценообразованием.

Текущий Национальный план углеродных квот РК на 2022-2025 содержит траекторию снижения бесплатного распределяемых квот по основным энергоемким отраслям – электроэнергетической, нефтегазовой, горнодобывающей, металлургической, химической и обрабатывающей. Соответственно, мы ожидаем, что начиная с 2023го года на местном рынке установится устойчивая аукционная цена на углеродные квоты, которая в дальнейшем может увеличиваться в соответствии с амбициями низкоуглеродной политики РК.

Как уже было отмечено ранее, на сегодняшний день Банком формируются подходы к определению климатического риска по категориям портфеля и выполнению климатического стресс-тестирования. После финализации таких инструментов совокупный уровень климатического риска будет использоваться при расчете ESG-рейтинга.



3 [S]ocial

Approach to disclosure

[S]ocial

How does the company measure its impact on society?



One of the most challenging task in disclosing social impact information is to recognize the impact, to identify how the company affects people's lives, and measure the extent of that impact. It is also hard to understand the risks and opportunities, to assess how the company can be affected by ineffective work with society. A “social license” to operate, gain trust and public favor, can be the key to successful development, and the lack thereof can be a significant risk for the long-term survival of the organization.

What are the risks of human rights violations in our organization, taking into account the entire value chain? How do our products and services impact society? Do they help solve society's problems or compound them? How does our work affect the lives of people in the regions where we operate? How do we assess this impact? What are the results of our social projects? What is our contribution to improving people's lives? What economic opportunities do we create for people and how do we do it? How might our work on environmental issues impact them? This is a partial list of key questions that should be covered in a quality report.

In doing so, in the organizational development effective communication and quality reporting are no less important than the strategy itself and the implementation of the principles of sustainable development; in the course of this interaction we build trusting relationships with stakeholders and can work together to improve the life of society and address social challenges.

Therefore, engaging with stakeholders, receiving feedback and promoting a dialogue with our employees, clients, regional communities and other stakeholders is a critical element of successful work on social issues. It is important for us to understand where the risks lie and identify available opportunities to help people, and this can often only be determined directly through communication, the ability to ask and listen.

At the same time, the main principle of successful communication would be openness: an honest story about what social challenges we face, a transparent disclosure of the methodology for measuring impacts, and a clear vision of how we are working on these challenges.

Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

Kazakhstani companies have been fast to adopt international trends and they try to integrate the best international practices into their reports. For example, **human rights issues** for sustainability reporting are quite new, however, in the TOP-50 of our Rating, 66% of companies have already made a statement that they are committed to protecting human rights, and stand ready to work to that end. At the same time, 14% of the companies described specific actions aimed at protecting fundamental human rights in their organization.

For some time now, companies have been working on issues of **equal job opportunities** and non-discrimination. 40 companies in the TOP-50 made a corresponding statement, but only 8 companies carry out specific actions aimed at putting this statement into practice.

The **quality of HR statistics** still has the potential for improvement. These statistics are essential so that stakeholders, as well as company management, can see, at least on a limited level, the risks of inequality in the organization.

In some 40-45% of reports of the TOP-50, detailed statistics on human resource management issues is provided. The leaders of our Rating, for example, indicate the structure of personnel by social group for each category of employees, and also provide the structure of hired and dismissed employees, or disclose turnover indicators, including for individual social groups, and also provide indicators on employee training in the reporting year etc.

42% of companies disclose **tools for receiving feedback from employees**, which is an important aspect of developing the organization's social practices.

Occupational safety issues are typically covered very well, all companies on the list disclose their approach to this issue.

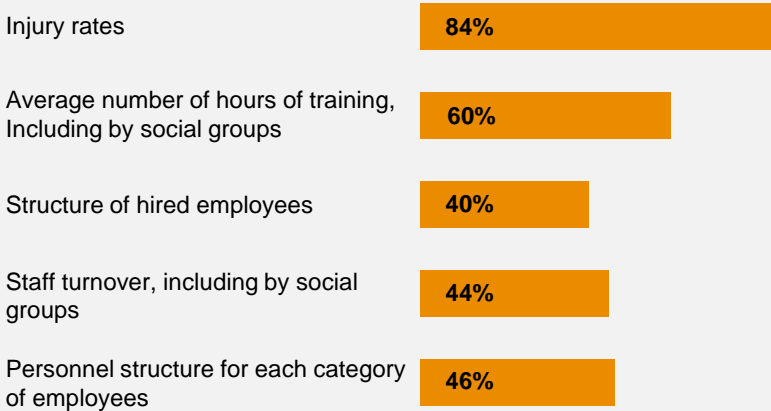
54% of companies provide information on their **investments in communities**, infrastructure and services. At the same time, 30% of organizations also provide information on how they assess impacts on society, including consultation with representatives of local communities.

80% made a statement about the importance of ensuring equal job opportunities and non-discrimination

16% disclosed measures taken to ensure equal career opportunities and non-discrimination

30% of Reports included the ratio of the average salary of women to men for each category of employees

How do Top-50 companies disclose their HR figures?





What to focus on in the next report

Specific actions

An essential component of a quality report is to make a statement that certain social issues are important to the organization, that management recognizes them and is working on them, and that the company accepts certain responsibilities. However, it is equally important to describe the specific actions the company is taking to reduce risks and solve problems that exist or may arise.

For example, in matters of ensuring equal job opportunities, it is worth paying attention to specific actions, activities, and initiatives that in practice will help ensure this equality and effectively manage the risk of discrimination. This also applies to other social issues, such as protecting human rights or supporting communities. Priority should always be given to specific decisions and actions of the organization.

It may help to include examples of cases and projects in the report describing their results and effects on improving the lives of people and society.

Impact assessment

Impact and risk assessment has always been the starting point and a pivotal step in successful sustainability reporting. But for social topics, due to the large amount of qualitative and background information, this work is particularly complex and has the development potential for many organizations.

The organization will have to draw up a methodology, select metrics and sources of information that will help both stakeholders and company management see the social risks within the operating model. At the same time, greater attention should be paid to the stakeholder engagement approach.

A first step in this respect could be made within the region and industry, this can already provide a starting point in analyzing the risks and impacts of the company. Benchmarks will also help. In all other respects, the company's approach and analysis results will be very specific to each organization. In each case, engaging with society has its own particularities, and there are almost no ready-made methods and guidelines.

Risks of human rights violations

Many social issues and challenges are related to the violation of fundamental human rights and disrespect for them. Therefore, Reporting Standards, regulatory actions and organizational strategies are increasingly aimed at effectively monitoring and managing the risks of violation of these basic rights.

Work in this area will comprise four phases:

1. Assessment and prioritization of risks of human rights violations - it is necessary to move from abstract concepts related to human rights to understanding the specific living conditions of people;
2. Strategy in relation to identified risks - an approach to managing identified facts of human rights violations, or to preventing them in the future. Action Plan;
3. Further monitoring of risks using relevant indicators and procedures; and
4. Communications - how and what risks had been identified and what actions are taken by the organization.

Examples of disclosures

[S]ocial

Swisscom is **demonstrating** its commitment to equal opportunity through its recruitment and management selection practices. An intersectional approach is also highlighted, which takes into account gender, age, nationality, disability, etc.

Social Sustainability Report of **Lloyds Banking Group** contains a significant chapter on staff support. Initiatives include measures to improve physical and mental health, financial well-being and support on domestic violence.

Diversity and equal opportunities

Management approach

The diversity of our employees represents added value for us. Diversity promotes innovation and makes us more successful. Swisscom stands for a culture in which differences are valued and discrimination or exclusion have no place. We carry this attitude internally and externally. We also ensure the inclusion of employees with physical and psychological impairments. We design relevant processes in recruitment, appointment, development, talent management and leadership culture in such a way that they counteract even unconscious stereotyping and enable true equal opportunities. In the past year we pushed ahead again with the promotion of diversity.

Nationality and language

People from 94 different nations work for us at various locations in all regions of Switzerland. When recruiting new employees, wherever possible we prioritise applicants from the respective language region as they are familiar with local customs. To attract talented people with the necessary profiles, we maintain partnerships with universities in the separate language regions of Switzerland.

Generations

At our company, people together – from young careers to colleagues with a wide range of experiences and competences – is valuable and enriches intergenerational cooperation.

Diversity in management bodies

We have three women Directors and one woman Executive Board. Together with the Group Executive Board, we pursue the goal of increasing the proportion of women in management positions in the language region of Switzerland to ensure that they are equally represented.

Proportion of women

In 2022, the proportion was 14.2%. Each business unit is responsible for increasing the proportion of women in management positions, we give preference to women with identical skills, search for them specifically (active sourcing) and grant a certain degree of flexibility in terms of workload and location.

Gender equality

In the professions in demand by Swisscom, the majority of trainees are still men. To get young women interested in ICT professions, we organise the annual 'Digital Days for Girls'. Female apprentices from ICT training courses present their everyday working life to female students and, in so doing, make them more familiar with ICT. The proportion of our women entering the ICT professions in the year under review was 26.6% (prior year: 27.5%).

As a member of the nationwide Advance initiative, we promote access to training and networking opportunities for our female employees. In this way, they can increase their chances of a career move into a more responsible role.

h as Diversity, Swisscom, cur-

cess we focus on the qualifications of our employees towards our values. Criteria and gender must not lead to discrimination in guidelines for hiring managers. Actions for action, such as avoiding gender-neutral tenders. In addition, a part-time or job-sharing basis. With support of persons from third countries, legal regulations and give priority to Swiss nationals.

Through the Check Your Chance initiative run by the Swiss Employers' Association, we support the career entry of young people in difficult situations and make it easier for older employees to leave the workforce by partial retirement in stages. To counteract the knowledge and the shortage of skilled workers with the upcoming, larger wave of retirement, we promote the transfer and development of knowledge, for example, through mentoring or junior programmes. These include, for example, cross-generational mentoring, which is to create cross-generational and cross-gender teams which enrich each other. The aim of the Junior me is to make young people fit for the tasks of Swisscom and thus to promote young talent in a more responsible role.

Supporting our colleagues

We know the challenges of our business in a digital world. We are committed to supporting our colleagues in the most effective way possible.

Colleagues engagement

In 2022, we continued our efforts to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

Health and wellbeing

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

Financial wellbeing support

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

Domestic and economic abuse support

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

Parental leave support

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

Colleagues mental health

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

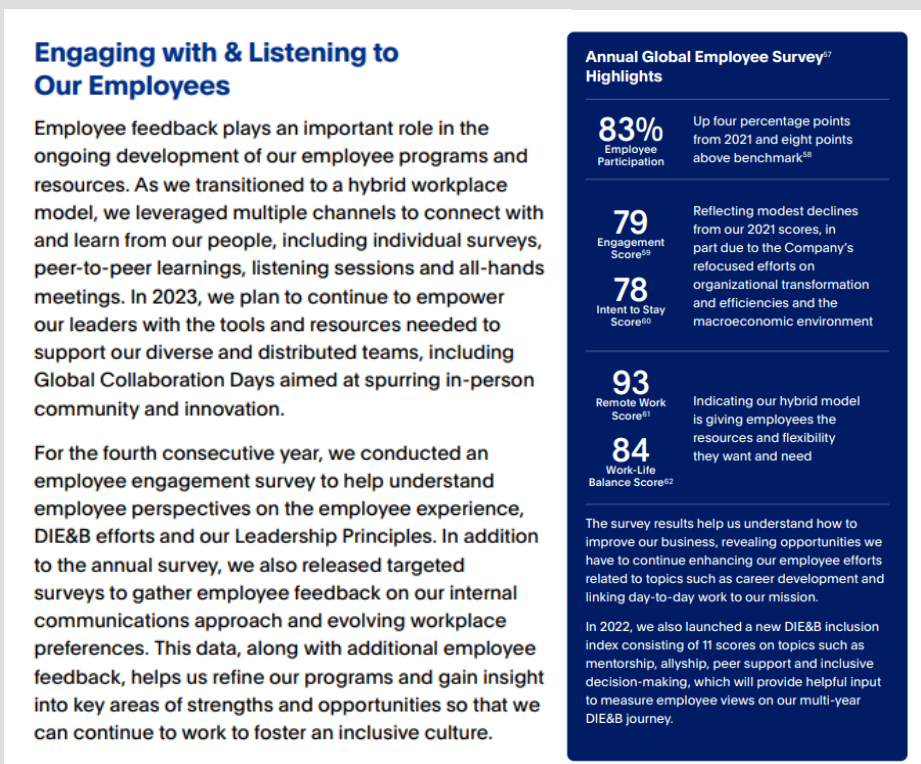
Group emergency response

We have implemented various measures to support our colleagues in the most effective way possible. We have implemented various measures to support our colleagues in the most effective way possible.

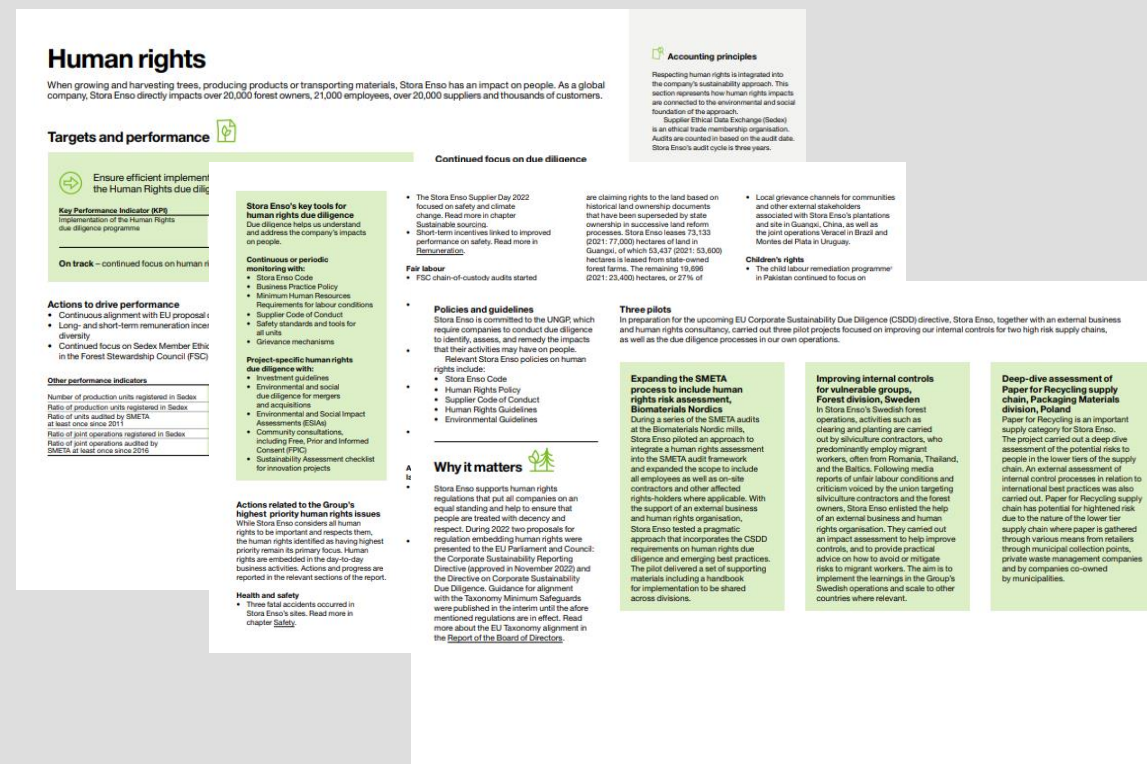
Examples of disclosures

[S]ocial

PayPal highlights the importance of receiving employee feedback in its [Annual Report](#). The company continues to collect each year the results of employee survey, measuring the effectiveness of HR management using several metrics.



In its [2022 Report](#), **Stora Enso** discloses its extensive work on human rights. Within this section, the emphasis is put on due diligence and targeted work to protect human rights, and three pilot projects are presented.



Examples of disclosures

[S]ocial

The **Kazakhstan Housing Company** describes the policy and process for determining remuneration, the performance assessment and grading system, and discloses data on the ratio of the average salary of women to the average salary of men by employee category in the [Report](#).

Occupational health and safety in the **KEGOC Annual Report** is disclosed by providing a description of the management approach, data on internal training, dynamics of injury rates, and most importantly, the procedure for working with contractors and their coverage by the occupational safety and health system is indicated.

ВОЗНАГРАЖДЕНИЕ

Основной целью политики вознаграждения в Компании является обеспечение работников конкурентоспособной заработной платой и применение прозрачной системы оценки результативности и премирования персонала, которая способствует повышению эффективности и материальной заинтересованности работников в достижении высоких результатов деятельности.

В Компании внедрена система оплаты труда на основе грейдов. Система грейдов позволяет работнику Компании осознать место, которое занимает его должность в существующей иерархии должностей, и оценить ее роль для Компании. Это возможность получить справедливое вознаграждение за труд – в зависимости от уровня сложности, ответственности за выполняемую работу, оценить перспективы своего профессионального и карьерного роста, последовательно приобретать новые профессиональные знания и навыки, необходимые для эффективной работы на более высокой должности.

Оценка результативности работы работников проводится на основе карт КПД с учетом достижения стратегических целей Компании и показателей индивидуальной результативности. В рамках такого подхода формируется вертикально-интегрированная структура КПД, что позволяет распределить ответственность за достижение стратегических целей по каждому ответственному работнику.

Соотношение среднего оклада женщин и среднему окладу мужчин по категориям:

топ-менеджмент – 0,93	руководители среднего звена – 1	главные специалисты и специалисты – 0,95
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Политика вознаграждения

Уровень вознаграждения регулируется диапазонами оплаты, построенными на основе грейдов. Грейды формируются на основе оценки и группирования должностей равнозначной ценности в зависимости от их вклада в достижение Стратегии развития Компании с учетом следующих факторов оценки: (1) знания и умения; (2) решение вопросов; (3) ответственность.

КПД разрабатываются путем прямого каскадирования или декомпозиции стратегических КПД Компании, исходя из области ответственности, закрепленной руководящим работником, а также функций и бизнес-задач каждой должности. Вознаграждение по результатам деятельности за отчетный период выплачивается руководящим работникам в зависимости от результатов их работы, достигнутые успехи и повышения эффективности работы.

Наряду с финансовым вознаграждением, в Компании существуют нефинансовые вознаграждения в виде морального поощрения (грамоты, благодарственные письма).

В 2022 году в рамках празднования Дня национальной валюты, Дня Независимости и Дня Республики грамотами и благодарственными письмами награждены 23 работника Компании.

Процесс определения вознаграждения

Оценка должностей руководящих работников Компании осуществляется путем привлечения внешних экспертов, имеющих соответствующий сертификат.

Совет директоров определяет размер вознаграждений и условий оплаты труда руководства с предельным рассмотрением Комитетом по надбавкам, вознаграждениям и социальным вопросам Совета директоров Компании.

Работники Компании не реже одного раза в три года проходят все виды обязательного обучения по безопасности и охране труда, квалификационные проверки знаний нормативных актов в области электротехники. В 2022 году дополнительно проведено обучение по международному стандарту «NEBOSH Международный сертификат по охране труда и технике безопасности International General Certificate».

Перед началом и работе работники проходят обучение безопасным методам производства работ, стажировку на рабочем месте, первичную квалификационную про-

ВНЭ и нормированное на 1 млн чел. часов. Значение коэффициента LTFR за 2022 год составило 0,45 (0,15 – в 2021 году).

При возникновении происшествий работники Компании руководствуются правилами, регламентными процессами расследования происшествий, инцидентов и предоставления отчетности по безопасности и охране труда.

Применены следующие случаи, угрожающие деятельности Компании:

- падение с высоты;

Охрана труда

КЛЮЧЕВЫЕ ПОКАЗАТЕЛИ

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

Совет директоров АО «KEGOC»

Ключевые показатели

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

Комитет по безопасности и охране труда, окружающей среды

Ключевые показатели

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

Правление АО «KEGOC»

Ключевые показатели

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

0,45

LTFR

1,08

Расходы на охрану труда

Examples of disclosures

[S]ocial

M&P considers the needs and demands of local communities when conducting social responsibility activities. Core activities cover urban regeneration, economic empowerment and community building.

Building safer and stronger communities together

We invest in and support the communities we live and work around the world

Social responsibility is firmly embedded in M&G's operations. We aim to use our community investment to help break down and to provide a framework for community engagement and our social purpose is to help build inclusive and resilient communities and communities. We work closely with our charity partner

Our purpose is to help people manage and grow

Breaking bar
Helping to build inclusive

Urban regeneration
Nurturing spaces and places that help people and nature to thrive

Economic
Giving people the tools to become

Disaster and

Urban regeneration: Nurturing spaces and places that help people and nature to thrive

Habitat for Humanity
Through our partnership with Habitat for Humanity GB, we aim to help deliver the Empty Spaces to Homes programme in the UK and Europe. We are renovating buildings, turning unused spaces into homes for vulnerable groups, including refugees, women fleeing domestic abuse, young care leavers and low-income families.
To date, we have renovated 8 empty spaces into homes in England (London and Poland (Warsaw and Silesia Region)), and construction is currently underway on more properties, including new locations across Europe.

The Empty Spaces to Homes programme is raising the standards and expectations of care
Thank you M&G, for making this happen."

Lydia Freeman
Children's Care and Support, London Borough of Barking

Act responsibly

Equipping vulnerable people with skills and knowledge

Ambika lives in Bangalore, India, with her husband and three children, and the support provided by the Family Strengthening Programme over the last five years has been life changing.

Ambika's children were at anemic and underweight, so SOS Children's Villages provided Ambika with nutritional supplements to help restore their health and information on the importance of a balanced diet. Her children also received support with tuition fees and school supplies, allowing them to attend school on a regular basis.

Ambika also enrolled in one of SOS India's Self-Help Groups, which equipped her with the skills and knowledge to help her manage her money, including getting a personal bank account and learning about savings and insurance. Through the Self-Help Group, Ambika also took lessons in entrepreneurship development, financial literacy, communication, and parenting skills. Along with her husband, Ambika now makes a comfortable living selling vegetables.



Supporting refugees in crisis

In response to the Ukraine crisis, M&G made emergency corporate donations to the Family Strengthening Programme over the last five years has been life changing.

Our strategic, two-pronged approach helped enable immediate humanitarian aid as well as the provision of longer-term, affordable housing support to those displaced by the conflict.

SOS Children's Villages provided immediate assistance with humanitarian aid, identifying children in high-risk areas and moving them to safer parts of the country. Counseling and mental health support is a key part of the care provided, as these families have experienced severe trauma.

Our donations supported the Ukrainian Red Cross Society to carry out repairs on vital infrastructure such as water stations, homes, healthcare centres, schools and community centres. It also helped to enable the supply of medicines and medical equipment to hospitals and primary health care facilities and supported the provision of food and hygiene items.

Habitat for Humanity in Poland, Hungary, Romania and Slovakia
worked with partners from other NGOs in a united response to provide for longer-term affordable housing needs. Our colleagues in Poland also worked with the charity to support refugees arriving in the country.



Governance

Our operating model for Corporate Responsibility (CR) guides and supports each office to manage charitable activities, within the framework of a consistent, business-wide approach. Our CR Governance Committee oversees community investment activity as well as agreeing strategy and spend. It includes representation from senior management. Our CR strategy and performance is reviewed by M&G's Executive Committee bi-annually.

The CR team is responsible for managing all our CR activities: devising community investment initiatives, measuring impact and spend, and tracking performance against annual competitor benchmarking, as well as refining issues of key social importance to M&G, and determining where we can have the greatest social impact.

Charitable donations

We calculate our community investment spend using the Business for Social Impact standard (BSI5). This includes cash donations to registered charitable organisations, as well as a cash equivalent for in-kind contributions. Our total community investment spend in 2022 was £4.3 million, of which £3.3 million was cash. The balance included in-kind donations prepared in accordance with BSI5 guidelines. This included 1,345 colleagues who dedicated 8,964 hours of fundraising and volunteering in their communities. Furthermore, £165,626 was donated across the business by our employees through our payroll giving scheme.

£4.3m
Total community investment spend in 2022
8,964
Total volunteering hours

Act responsibly

Funding education through charities

Our colleagues in Italy have used their local community grant to support Ewe Mama Oris in Uganda for the past two years. The charity provides training and school education to some of the most vulnerable in Rwenzori. The charity has built a vocational school for boys and girls, including those with disabilities and an orphanage for girls.

Thanks to M&G's support, the school has expanded to build a new nursery for up to 200 children. Funds have also been used to build a dining hall, and renew all the fences and gates on the perimeter. The dining hall will be used by the nursery children, as well as the wider community for educational and recreational activities.

Kazchrome places great emphasis on engagement with local communities in their development work and impact monitoring. The **Annual Report** also provides quantitative data on social investments.

Развитие и благосостояние местных сообществ



Соблюдение прав человека является залогом устойчивого развития. Компания и местные сообщества в регионах присутствия

Одним из приоритетов Казchrome является развитие социальных сообществ в регионах присутствия. Компания реализует программы, направленные на развитие местных сообществ, сотрудничество с ними в целях достижения целей устойчивого развития. Это предполагает, среди прочего, постоянное взаимодействие с местными сообществами и соблюдение международных стандартов, улучшение условий жизни и повышение благосостояния населения, а также

поддержку предпринимательства и развитие бизнес-среды. Взаимодействие с местными сообществами, Компания реализует программы, направленные на развитие местных сообществ, сотрудничество с ними в целях достижения целей устойчивого развития. Это предполагает, среди прочего, постоянное взаимодействие с местными сообществами и соблюдение международных стандартов, улучшение условий жизни и повышение благосостояния населения, а также

В 2022 году были осуществлены следующие социальные инвестиции:

- Строительство биоточной системы очистки сточных вод на территории предприятия по переработке биомассы на ДЭП
- Строительство очистных сооружений производственных вод Алтынбонского ферросплавного завода
- Строительство Алтынбонского ферросплавного завода

Кроме того, для реализации социальных инвестиций были созданы следующие структуры:

Учреждениями на территории Республики Казахстан, в январе 2022 года Группой ЕБС, включая Казchrome, направлена 30 млрд тенге на поддержку создания государственного общественного социального фонда «Казахстан халқына». Фонд был создан с целью решения приоритетных задач национального развития, включая, среди прочего, совершенствование здравоохранения, образования и социальных услуг.

В течение 2022 года социальные инвестиции были направлены:

- Повышение уровня жизни (включая жилищно-коммунальную инфраструктуру, общественный транспорт и благоустройство городского пространства)
- Образование и повышение профессиональной квалификации молодежи (включая поддержку местных образовательных программ и программ развития предпринимательства)
- Здравоохранение (включая модернизацию медицинских учреждений и повышение квалификации врачей)
- Популяризацию спорта и здорового образа жизни (включая развитие местной спортивной инфраструктуры и молодежных спортивных лиг)
- Местным медицинским учреждениям на оказание оборудования и привлечение молодых специалистов
- Социально-уязвимым слоям населения и региональным детским домам
- На поддержку коммунальных служб для приобретения спецтехники
- На ремонт фасадов и кровли жилых домов
- На поддержку международных и республиканских спортивных мероприятий и участие детей в спортивных соревнованиях
- На строительство спортивных сооружений (детские и спортивные площадки, в том числе и для детей с ограниченными возможностями)

Развитие и благосостояние местных сообществ (продолжение)

Социальные инвестиции

В 2022 году был запущен новый этап трехлетней программы регионального развития, призванной поддержать долгосрочное социально-экономическое развитие в регионе присутствия. Программа реализуется в партнерстве с государственными органами на национальном и региональном уровнях, в том числе посредством региональных меморандумов о взаимном сотрудничестве.

Социальные инвестиции, млн тенге

Тип инвестиций	2021	2022
Финансирование	5,399	21,238
Нефинансирование (включая персонал)	5,186	3,689

учреждений и повышение квалификации врачей)

В рамках работы по содействию решению приоритетных задач национального развития, определенных Правительством Республики Казахстан, в январе 2022 года Группой ЕБС, включая Казchrome, направлена 30 млрд тенге на поддержку создания государственного общественного социального фонда «Казахстан халқына». Фонд был создан с целью решения приоритетных задач национального развития, включая, среди прочего, совершенствование здравоохранения, образования и социальных услуг.

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- Образование и повышение профессиональной квалификации молодежи (включая поддержку местных образовательных программ и программ развития предпринимательства)
- Здравоохранение (включая модернизацию медицинских учреждений и повышение квалификации врачей)
- Популяризацию спорта и здорового образа жизни (включая развитие местной спортивной инфраструктуры и молодежных спортивных лиг)
- Местным медицинским учреждениям на оказание оборудования и привлечение молодых специалистов
- Социально-уязвимым слоям населения и региональным детским домам
- На поддержку коммунальных служб для приобретения спецтехники
- На ремонт фасадов и кровли жилых домов
- На поддержку международных и республиканских спортивных мероприятий и участие детей в спортивных соревнованиях
- На строительство спортивных сооружений (детские и спортивные площадки, в том числе и для детей с ограниченными возможностями)

Examples of disclosures

[S]ocial

In its 2022 [Report](#), **Societe Generale** describes a range of existing inclusive products, as well as their related targets. Such products include microfinance services, tools for accessible and inclusive banking services.

Triodos Bank provides loans and investments to borrowers with positive impact and the potential to accelerate the transition to a sustainable economy. The [Annual Report](#) provides asset breakdown by priority areas.

BUILDING A SOCIAL AND INCLUSIVE RANGE OF PRODUCTS AND SERVICES

Under its financial inclusion policy, Societe Generale supports innovative approaches to sustainable economic development that combine environmental and societal performance, by supporting the development of **microfinance operators**, in France and abroad. It also offers **tailored products and services** for students, customers in financial difficulty or those looking for more inclusive finance. In France, Societe Generale drives for more inclusive finance. In France, Societe Generale drives for more inclusive finance. In France, Societe Generale drives for more inclusive finance.

INCLUSIVE BANKING

In France, Societe Generale renewed its partnership with Bpifrance, offering loans to students who have no income and nobody to act as guarantor for them. Once again in 2022, the Group was the top distributor of Bpifrance student loans with a total of EUR 61 million paid out (from a budget of EUR 70 million).

MICROFINANCE

The Group has worked in partnership with Bpifrance, promoting the right to economic microfinance throughout both metropolitan France and overseas. Credit lines provided in partnership with Bpifrance at the close of the year, vs. EUR 18.3 m.

VULNERABLE CUSTOMERS

The Groupe provides a free package of basic banking services in France. Customers can sign up to Générïs, a banking services package designed to help them manage their finances for just EUR 1 a month, down from EUR 3.

KEY FIGURES RELATING TO SUPPORT FOR VULNERABLE CLIENTS

	2020	2021	2022
Number of clients benefiting from the Kapsul offer	3,553	5,170	5,622
Number of clients benefiting from the Générïs offer	57,086	55,831	55,355
Provision of credit lines in partnership with ADIE (in EURm)	3.9	4.3	7.5
Loan outstandings with ADIE (in EURm)	14.8	18.3	18.2
Microfinance loan outstandings in Africa (in EURm)	95	101	120

Loans and funds' investments by transition theme

The improved quality and growing size of the loan and investment portfolio are important indicators of the contribution Triodos Bank makes towards a more sustainable economy. All the themes it works in qualify as sustainable: the companies and projects it finances contribute to delivering Triodos Bank's mission.

Total outstanding loans and funds' investments by transition theme 2022

Transition Theme	Loans	Funds' investments	Total
Food	43%	13%	29%
Resources	21%	35%	18%
Energy	7%	34%	16%
Society	17%	11%	22%
Wellbeing	10%	7%	10%
Residential mortgages	0%	0%	0%
Municipalities and other	0%	0%	0%

Food 4% (2021: 5%)

The Food transition theme includes organic agriculture and projects across the entire agricultural value chain in Europe and emerging markets – from farms, processors, wholesale companies and sustainable trade to natural-food shops.

Resources 10% (2021: 10%)

The Resources transition theme consists of: the sustainable property sector, in which we finance new buildings and renovation projects to reach high sustainability standards; the sector nature development and forestry, which is important to remove greenhouse gases from the atmosphere; and retail, production and professional services sectors that contribute to reduced resource waste or stimulate circular production and consumption and circularity-related services.

Energy 22% (2021: 23%)

The Energy transition theme consists of renewable energy projects – such as wind and solar power,

Impact

We want to deliver sustainable impact. When we talk about 'impact', we are concerned with what our actions, in particular financing and investing, mean to people in concrete terms. Impact means delivering positive outcomes, not only at a transactional level but also at a social and ecological system level.

Risk

Because our starting point is to deliver greater impact over the long term, it is essential that we are financially resilient. We therefore focus on maintaining a consistently high-quality loan portfolio. Triodos Bank's modest risk appetite is an important building block for this resilience.

Return

We have been able to deliver stable, fair returns over a sustained period. For us, financial performance is important because being a resilient financial institution is essential for the delivery of lasting, sustainable change.

Society 16% (2021: 16%)

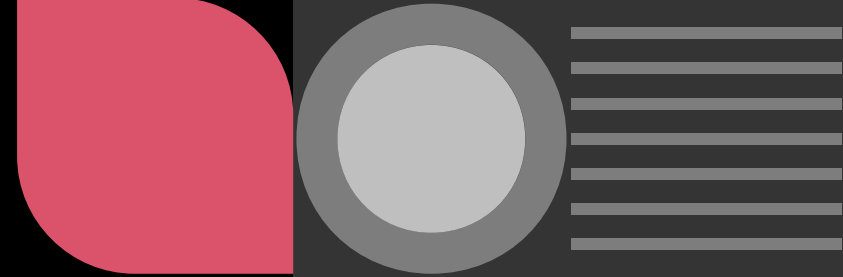
This theme contains loans and funds' investments to businesses and (non-profit) organisations with clear social objectives, such as social housing, community and social-inclusion projects. It also covers the inclusive finance and fair-trade businesses sector.

Well-being 18% (2021: 20%)

The Well-being transition theme covers loans and funds' investments to organisations working



4 [G]overnance



How sustainability issues are managed at the highest level?



In this section, report users are mostly expecting to see management and control processes existing in the organization that help effectively cope with sustainability risks, and manage the organization's impacts on the environment and society.

Who is responsible for managing sustainability issues? Including members of senior management and executive management. Do the people responsible for overseeing the sustainability strategy and its implementation have the necessary qualifications and skills and/or are working to develop them?

How is the implementation of the sustainable development strategy monitored? What metrics are used? How often are sustainability issues addressed? Are sustainability metrics included in executive remuneration?

“Who, how and what procedures and processes are in place” are questions to be covered in the sustainability report, which requires the organization to truly integrate sustainability issues into its management system.

This is in addition to disclosing information about classic corporate governance issues, which makes it possible for stakeholders to see that the organization has an effective, transparent decision-making system that takes into account the interests of all stakeholders.

At the same time, today sustainability issues appear in almost all aspects of corporate governance information. When demonstrating the governance structure, for example, we show who among the senior management has competencies in the field of sustainable development. When disclosing information about selection processes and appointments, we indicate whether diversity criteria are used when electing new members, and the general policy of the organization's senior management and etc.

Managing the impacts and risks of sustainable development should become an integral part of the overall corporate governance system and be a standing agenda item for the highest governing bodies and management.

Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

Many corporate governance issues related to the work of senior management and existing processes and procedures have already become a common part of non-financial reporting and are disclosed at the appropriate level in most reports.

One of the key aspects of disclosing the governance structure is issues of diversity. It is important to show that senior management includes representatives of different social groups, and they can represent the interests of different stakeholders, as well as a balance of competencies, including competencies on sustainable development issues. In the reports for 2022, in the TOP-50, 20% of companies showed the **composition of the highest governing body by gender and age groups**. 26% of companies showed a **balance of competencies**, and 16% showed, among other things, the availability of competencies on certain issues of sustainable development.

Issues of senior management **remuneration**, in one form or another, are covered in approximately 80% of reports, while about 20% of companies also mention non-financial indicators that are integrated into management remuneration.

Almost every report in the TOP-50 list covers **anti-corruption** issues - one of the key socio-economic topics. Approximately 70% of reports also address ethical issues of the organization.

The **description of the sustainability management system** is provided in a slightly more than half of the reports. Companies disclose their governance structure, including those responsible for certain sustainability issues, as well as the role of senior management, in particular the board of directors and management. Having a sustainability management system that starts at the highest governing level is a key element of a successful ESG Transformation.

Sustainable development management:

- 50%** Indicated the people responsible for sustainable development issues
- 50%** Disclosed the role of senior management in overseeing the sustainable development agenda
- 6%** Provided information on non-financial KPIs integrated into management remuneration

How do TOP-50 companies disclose aspects of corporate governance?



What to focus on in the next report

Sustainable development management

"What are the organization's processes, controls and procedures for managing sustainability risks and opportunities?", is an important question that should be covered in the report.

Which governance bodies (e.g. committees) and specific decision-makers are responsible for managing sustainability risks and opportunities. How is this specified in the policies and documents regulating their activities and responsibilities? How often do decision-makers and governing bodies consider sustainability issues?

A very important question that also needs to be covered in the report today is how the organization's senior management takes into account risks and opportunities in the field of sustainable development when making decisions regarding the organization's strategy, for example, what trade-offs had to be made.

As you can see, today, the aspects of sustainable development management in an organization should be disclosed at a fairly detailed level.

Integration into corporate governance

An important aspect of Corporate Governance disclosure is to demonstrate the integration of sustainable development considerations. From this point of view, it's particularly worth focusing on:

- The composition of the highest governing body by social groups, categories and competencies in order to effectively consider the risks of sustainable development.
- Whether the company has a diversity policy for supreme governing bodies?
- Whether diversity criteria (by social groups, competencies, etc.) are integrated into the selection process for members of highest governing bodies?
- Whether non-financial indicators (sustainable development indicators) are integrated into the remuneration of executive directors?
- The procedures for assessing highest governing bodies.

The priority should be given to these questions.

Code of Conduct

Nowadays, the report users carefully read the provisions of the Policy/Code of Responsible Business Conduct, that is why particular attention should be paid to this issue within the report.

This information will include a description of the organization's values, principles and standards of conduct. It would be good if the document included references to international documents (e.g. drawn up within the UN or OSCE).

It is also important to tell how the responsible business policy is implemented in practice: who is responsible for implementing which elements. How these rules are implemented in other policies and procedures, for example, in supplier selection or HR management processes? How compliance with these rules and regulations is verified in the organization? What tools exist for filing complaints and for consultation?

As a result, the organization will not only have to demonstrate an approach to ensuring responsible business conduct, but also demonstrate how this approach is implemented.

Examples of disclosures

[G]overnance

The approach to sustainability management, assigning roles and responsibilities in sustainable development with references to relevant policies are described in the **Stora Enso Annual Report**.

JcDecaux discloses data on executive remuneration by name, indicating specific KPIs for Corporate Social Responsibility, their impact on remuneration and achievement of criteria.

Strategy, governance and stakeholders

Sustainability is integral in Stora Enso's strategy as well as corporate governance.

Approach to sustainability

In 2022, Stora Enso continued to develop its sustainability agenda based on the framework launched in 2021. The framework recognises the need to stay within planetary boundaries and that a significant mindset change is required: companies need to move from doing less harm to contributing positively to the reversal of negative trends, particularly in nature loss and climate change. Building on this new mindset, Stora Enso's goal is that all of its products and solutions will be 100% regenerative by 2050. The sustainability framework and 2050 ambition provide a long-term direction that will help shape markets and steer innovation.

Stora Enso contributes to the transformation of the materials system in three areas where it has the biggest impact and opportunities: climate change, biodiversity and circularity. By adopting a regenerative stance, Stora Enso is shifting its sustainability goals from minimising negative environmental impacts to becoming a net positive contributor within the defined focus areas. These ambitions stand on a foundation of conducting everyday business in a responsible manner and proactively managing the impacts from the Group's operations and value chain. In Stora Enso, sustainability is embedded in key business processes such as:

- Strategy and business reviews with the divisions
- Product management and innovation
- Investments, and mergers and acquisitions

Stora Enso has set targets and defined key performance indicators (KPIs) for its sustainability work, see Sustainability targets for more details. Progress is regularly monitored at group level and via divisional

Sustainability governance

At Stora Enso, sustainability is owned by the Board of Directors, the President and Chief Executive Officer (CEO), and the Group Leadership Team (GLT). The CEO has ultimate responsibility for the successful implementation of the Group's sustainability strategy. Read more about the management of the Company in the Governance section.

The Board of Directors' Sustainability and Ethics Committee oversees the implementation of Stora Enso's sustainability strategy and the ethics and compliance strategy. The Committee met four times in 2022 and has also reviewed the sustainability disclosures in this Annual Report. The main focus areas of the Committee during the year are described in the Governance section.

Alongside financial metrics, sustainability is one of the performance metrics in Stora Enso's short-term and long-term incentive programmes (STI and LTI). In the STI programme, the non-financial sustainability targets represent a 20% weight, divided into occupational safety measured by the total recordable incident rate (10%) and the reduction of production units' direct scope 1 and indirect scope 2

GHG emissions (10%).

In the LTI programme, the non-financial sustainability targets also represent a 20% weight. In addition to the GHG scope 1 and 2 target (10%), the LTI includes a target on diversity and inclusion, measured by the share of female managers among all managers (10%). For more information, see Remuneration.

Sustainability policies

Stora Enso's Sustainability Policy describes the Group's overall approach to sustainability. At the same time, the code of conduct – the Stora Enso Code – and other policies and guidelines on specific sustainability topics further elaborate the company's approach while also guiding its employees in their everyday work. Policies and guidelines on specific sustainability topics are listed in the respective sections of this report and are available at storaenso.com. The policies and guidelines are reviewed bi-annually.

Stakeholder engagement

Open dialogue with key stakeholders is crucial to identify concerns, global trends and market expectations successfully and proactively. Stora Enso's stakeholder

accounted investments, such as forest company Tornator in Finland.

Stora Enso sustainability framework

Transformation to the regenerative materials system

 Climate

 Biodiversity

 Circularity

Our foundation is in responsible business practices

Emissions
Sustainable forestry

Materials, residuals and waste
Energy

Water
Employees Safety

Business ethics
Human rights

Community
Sustainable sourcing

EXTRA-FINANCIAL CRITERIA	WEIGHTING ⁽¹⁾	ACHIEVEMENT LEVEL
CSR CRITERIA		
• EXTRA-FINANCIAL PERFORMANCE Remaining in the EF indices [CDP MSCI FTSE4Good]	2.00%	1.00%
• DEPLOYMENT OF THE NEW 2030 STRATEGY - Development of the Group Climate Strategy roadmap - Creation of an eco-design policy and action plans - Official partner of the United Nations for the promotion of the SDGs - Maintaining or increasing the proportion of women in governing bodies [33% in 2021]	2.00%	2.00%
• ENVIRONMENTAL FOOTPRINT - Green electricity [100% of consumption covered by renewable energy by 2022] - Reduction in fuel consumption [1.2% reduction in emissions compared to 2019] - 80% of waste recovered	4.00%	4.00%
• RESPONSIBLE BUSINESS ENVIRONMENT - Group health and safety policy - Responsible purchasing [assessment of key suppliers and training on responsible purchasing]	7.00% 4.00% 3.00%	7.00% 4.00% 3.00%
TOTAL	15.00% ⁽²⁾	14.00% ⁽²⁾
STRATEGIC CRITERIA		
STRATEGIC ACHIEVEMENTS 2022 A maximum of 42.50% of the annual fixed compensation, at the discretion of the Supervisory Board on the proposal of the Compensation and Nominating Committee: - The renewal of strategic contracts, the signing of new contracts, - The acquisition of companies - The execution of the digital strategy	42.50%	42.50%
TOTAL	42.50%	42.50%

Examples of disclosures

[G]overnance

National Grid, in its **Annual Report** invites you to have a detailed look at the Board of Directors engagement with various stakeholders. Specific engagement activities in which directors participated had been highlighted.

The structure of the Board of Directors by social groups, as well as by independence and length of service can be seen in the **KazAgroFinance 2022 Report**. In addition, a table of the competencies of each director in priority areas had been provided.

Board engagement

Engagement is key to the Group's long-term success and the Board directly and indirectly engages with key stakeholders, ensuring it understands their interests and takes them into account in Board decision making. This complements other engagement with the workforce (as set out on page 57). You can read the Board's Section 17(2) Statement on page 74.

Workforce engagement

Throughout the year we continued with our 'Full Board Employee Voice' approach, utilising our training and development engagement methods, and consultation channels to ensure meaningful engagement across all parts of the business by our Board. During the year, the Board's engagement comprised:

Small group listening sessions

These consist of informal listening sessions in attendance with different non-executive Directors. Meetings are coordinated by HR and represent a diverse mix of colleagues across our workforce. The sessions can be open discussion on specific themes.

Engagement in action

- Four Non-executive Directors, including the Remuneration Committee Chair, met colleagues in May 2022 for a remuneration focused engagement session, covering an opportunity to discuss the Chair's approach to remuneration.
- Four Non-executive Directors, including the Safety & Sustainability Committee Chair, met colleagues for a sustainability and risk focused engagement session in May 2022, providing an opportunity to discuss the Group's approach to these important issues.

Employee Resource Groups (ERGs)

We are proud to have 10 ERGs split across the UK and US, representing a significant and diverse proportion of the workforce. Our Board interacts with the ERGs to better understand their key areas of focus and future direction.

Engagement in action

Two Non-executive Directors attended the first ERG forum held in London in July 2022. Members of the Board also supported and spoke at virtual ERG sessions in June 2022.

The Chair was a panel member at the International Women's Day - Leadership Energy event hosted by our Veterans ERG.

Shareholder engagement

The Board is committed to maintaining strong communications with our investors (both equity and debt). The Company has a comprehensive investor relations programme which meets a range of key investors in person or virtually at small meetings and larger investor events. The Chair has made routine contact with shareholders who are involved in discussing Board governance. In addition, Committee Chairs such as the Remuneration Committee Chair engage with equity investors when their responsibility. Management also hosts webcasts for both our full-year and full-year results and interim updates from investors and analysts to ensure an open dialogue with the market. Presentations are given to analysts and investors covering the Group's results, along with all material and other regulatory announcements. This information can be found on our website at nationalgrid.com/investors.

Board performance evaluation

Our annual evaluation process provides the Board and its Committees with an opportunity to consider and reflect on the quality and effectiveness of their decision-making, and for each member to consider their own contribution and performance. Following on from the externally facilitated evaluation in 2021/22, the Board again engaged independent Board Evaluation (BBE) in 2022/23 as a continuation of the prior year evaluation, to check in on progress since the establishment of new Directors and to consider further areas of strengthening the relationship and effectiveness of the Board.

Findings of the Board evaluation

Our 2022/23 Board evaluation found that the focus on strategy has led to greater clarity and an agreed direction of travel between Board and management and the involvement of the Board with a diversity of perspectives and views to our decision-making. There are further opportunities to strengthen our focus on talent and succession. The findings also indicated a need to monitor performance metrics as various business units meet with the Board throughout 2023/24.

Performance of the Chair

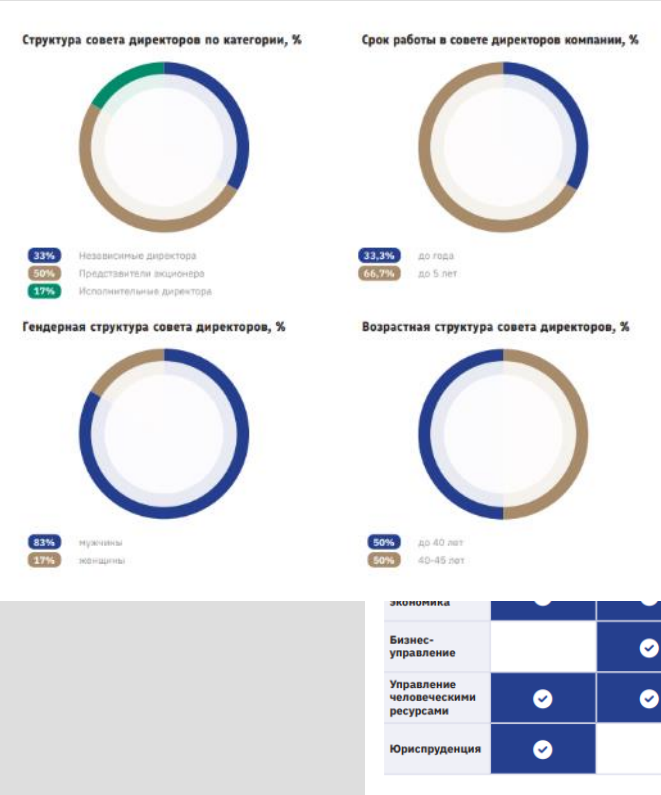
As part of BBE's evaluation, in line with the Code, each individual Director's effectiveness was evaluated, including our Chair's performance. Detailed feedback was shared directly with the Senior Independent Director, Thomas Lappard. Thomas also discussed the views of the Chair with each Director. An overview of the findings was shared during a private session between Thomas and Paul.

Shareholder engagement

The Board gets regular reports on our top shareholders, movements in the share register, share price performance and how we are engaging with institutional investors and analysts. It also discusses shareholder issues with management and advisors and considers them as part of its decision-making.

Board performance evaluation - progress against 2022/23 actions

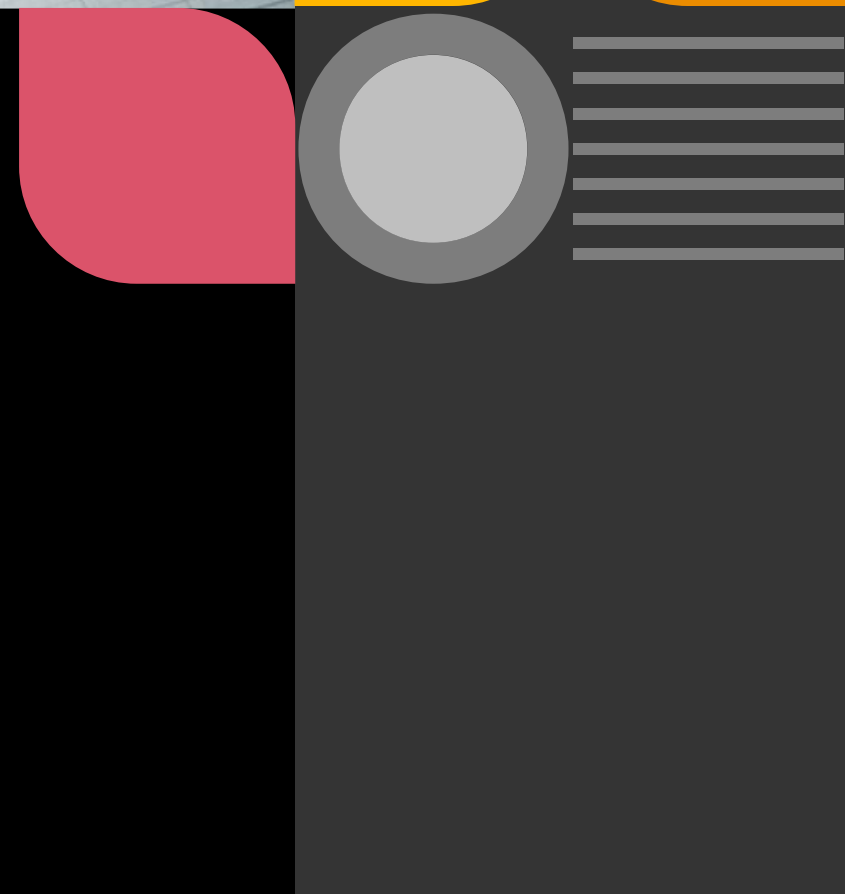
Area	Board actions for 2022/23	Progress against actions
Strategy	• Publish Board evaluation findings for 2022/23 and review against action	Agreed in view of strategy topics to be covered through the year and in particular the key sessions to include with the Board as part of the annual strategy meeting
Capability	• Strengthen focus on Board and succession at all levels, include regular updates on the Board's succession plan and align with opportunities for the Board to meet high calibre candidates	Continued the review of critical talent and succession plans, reviewed the progress of necessary diversity in the workforce via the People & Diversity Committee
Future	• Approved the revised Board Charter and Governance Committee Charter	Analysis will be ready to focus on the implications and our Purpose is integrated in the Board Charter
Employee engagement	• Review and refine the overall approach to employee engagement opportunities across the business	The People & Governance Committee reviewed our current approach and agreed to continue to be best for the Company (see page 77). The Board will continue to strengthen its focus on talent and succession for the 2023/24
Engagement with management	• Review effective communication from the Board to management, including early stage of emerging issues when required	Continued to review the Board's communication updates after each Board meeting as well as after other than a scheduled Board meeting. The Board is committed to ensuring that emerging issues are brought to the Board as required
Process and management	• Continue to improve discipline around Board papers and processes	The Board will continue to refine content and messaging within our Board papers
ESG	• Review the Board's commitment to ESG	There have been a number of external updates at our Board and Committee meetings and all engagements outside of the Board





5

Reporting Practices



Approach to disclosure

Reporting practices

How to prepare a good Sustainability Report?

Writing a sustainability report today is several times more difficult than it was, for example, ten years ago. Expectations from non-financial information have changed considerably, but the requirements for the level of sustainable development practices of the organization have increased even more. These requirements are also conveyed through reporting standards. Today, it is impossible to prepare a quality report without an adequately developed sustainable development practice that is deeply integrated into the organization's business model.

When we take a look at the emerging reporting standards, such as IFRS S1/S2 or CSRD (ESRS), we can see that the organization is expected, for example, to have a developed strategy on significant issues of environmental and social impacts, to have an ESG risk management system, an effective management system of sustainable development and impacts of the organization. Collecting data and providing information on your environmental and social projects is no longer enough.

Even if the company is not subject to the new standards, it is worth paying attention to the trend. Reporting standards reflect the views of a wide range of stakeholders.

Reporting will only be the final step and outcome in the ESG Transformation. This process would begin with the selection of sustainability priorities: impact assessment and risk assessment. This would include developing a strategy for managing these risks and impacts, which should demonstrate the organization's ambitions, its readiness to achieve a specific outcome, and the existence of a plan. The transformation will begin with the management system and changes in corporate governance processes and principles, including non-financial data management, and then move to the operational level, where the strategy will be translated into initiatives and projects. The results of each of these phases will be indicated in the annual report, and the level of work performed will determine the quality of this report.

If a company has been working on ESG Transformation, on developing sustainable development practices, then meeting evolving reporting standards and rising expectations will not be an issue for it now or in the future. After all, reporting has never been an end in itself.



Results of the analysis of Kazakhstani Reports (TOP-50 Rating)

We can see that the leaders of our Rating are increasingly integrating developing trends in information disclosure into their reports, and are working to improve the quality of reports year by year. With few exceptions, where it is truly a requirement for the organization, these companies go far beyond what regulators require of them and show a high level of voluntary disclosures.

Out of 50 reports on our list, 36 reports are prepared as per GRI Standards. At the same time, the updated GRI Standards require the organization not only to provide fairly comprehensive statistics on environmental and social impacts, but also to describe management approaches and strategies for managing these impacts. Not all companies have yet switched to the new standards, but the trend towards transition and increasing the level of GRI compliance is obvious. Strict compliance with these standards can become a pillar of the company both in the development of reporting and in the development of ESG in general.

Out of 50 reports 5 reports contain references to the TCFD recommendations, which in recent years have become key rules for disclosing information about climate change risks and opportunities. Now the TCFD recommendations will no longer exist separately and will be replaced by IFRS S2. For Kazakh companies, these disclosures are still new, but we see that a number of organizations are now actively working on assessing and managing climate risks.

Increasing consideration is being given to the quality of non-financial information and its reliability by Kazakhstani companies. While last year there was only one report in the TOP-50 with independent assurance of non-financial information, this year there are 9 reports having independent assurance, including 7 in the top ten of the Rating.

Good work has been done on the presentation of the information, making it easy to use for stakeholders. 56% of reports in the TOP-50 received high scores for the report design, including structuring, navigation, and key ideas.

- 35** Reports were prepared as per GRI Standards (33 based on 2021 results)
- 9** Reports have an external assurance of non-financial information (1 based on 2021 results)
- 5** Declared adherence to TCFD recommendations (2 based on 2021 results)





What to focus on in the next report

Reporting strategy

Taking into account ever-evolving standards and approaches to reporting, before starting work on the next report, attention should be paid to shaping the organization's approach to stakeholder communication.

What is the purpose of issuing a sustainability report or annual report? What would be considered a high quality outcome? Against this background, it will also be clear what resources should be allocated to prepare the report.

Who are we preparing the report for? What is the audience of the report? What information is important for the users of this report? What key messages do we want to convey to the audience? How does the report support the organization's development strategy? Among other things, this will help to select the relevant reporting standard and formulate its structure.

However, the sustainability reporting strategy will likely span several years, providing a clear picture of what and how the company will do in this area

Ensuring quality

In an ideal scenario, non-financial information should be subject to the same quality requirements (including within the organization) as financial information.

The quality of information will depend on the data management systems within the organization: how data is collected, stored and controlled, including the level of process automation.

It will depend on the methodologies used and approaches to calculating indicators and disclosing information. It is important to make sure that the indicators are comparable with other organizations' indicators. Indicators specific to a particular business are used only in addition to the main indicators.

Finally, the quality of the information will depend on independent verification. Information can be verified within the organization at different levels of governance, or with the involvement of an independent verifier, in any case, this is a critical element of a good report.

Continuous development

Each new report will differ from the previous one in content, and sometimes significantly. An organization will have to find a balance between integrating new indicators and standards and maintaining the information that stakeholders are already accustomed to seeing in the company's reports year by year.

Companies should constantly monitor new reporting trends, and when starting preparing a new report, check whether changes need to be made and adapt the approach to disclosure of information to changing expectations. In such a situation, it would be difficult to conduct benchmarking: in recent years, companies have to do completely new things that no one else in the world has done yet.

The work on ESG reporting should be planned for several years in advance. Some changes (for example, climate risk disclosures) are difficult to implement quickly, and therefore it is better to start the work in advance to ensure comfortable conditions for its implementation, and effective and quality disclosure of new information.

Reporting practices

Annual Report of **UPM** provides an independent assurance report not only on compliance with the GRI disclosures, but also the AA1000 Accountability Principles Standard.

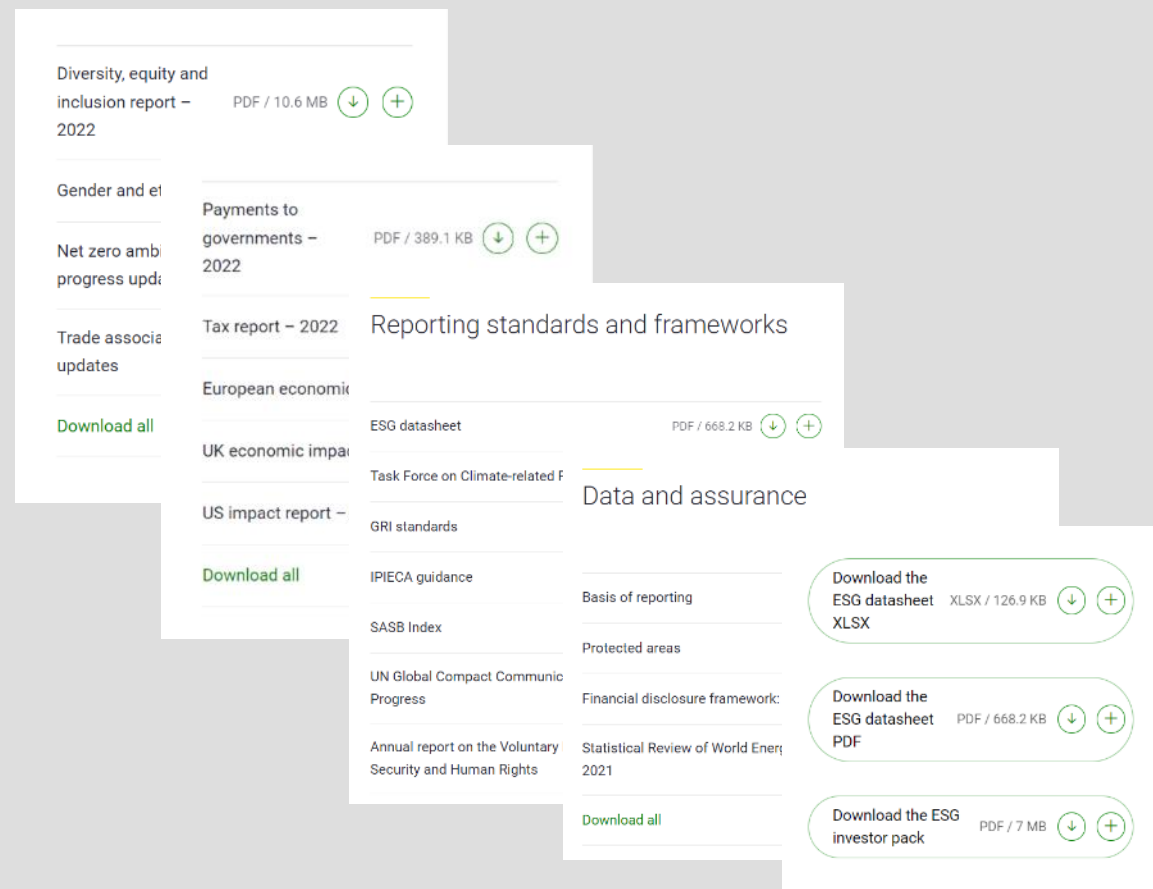
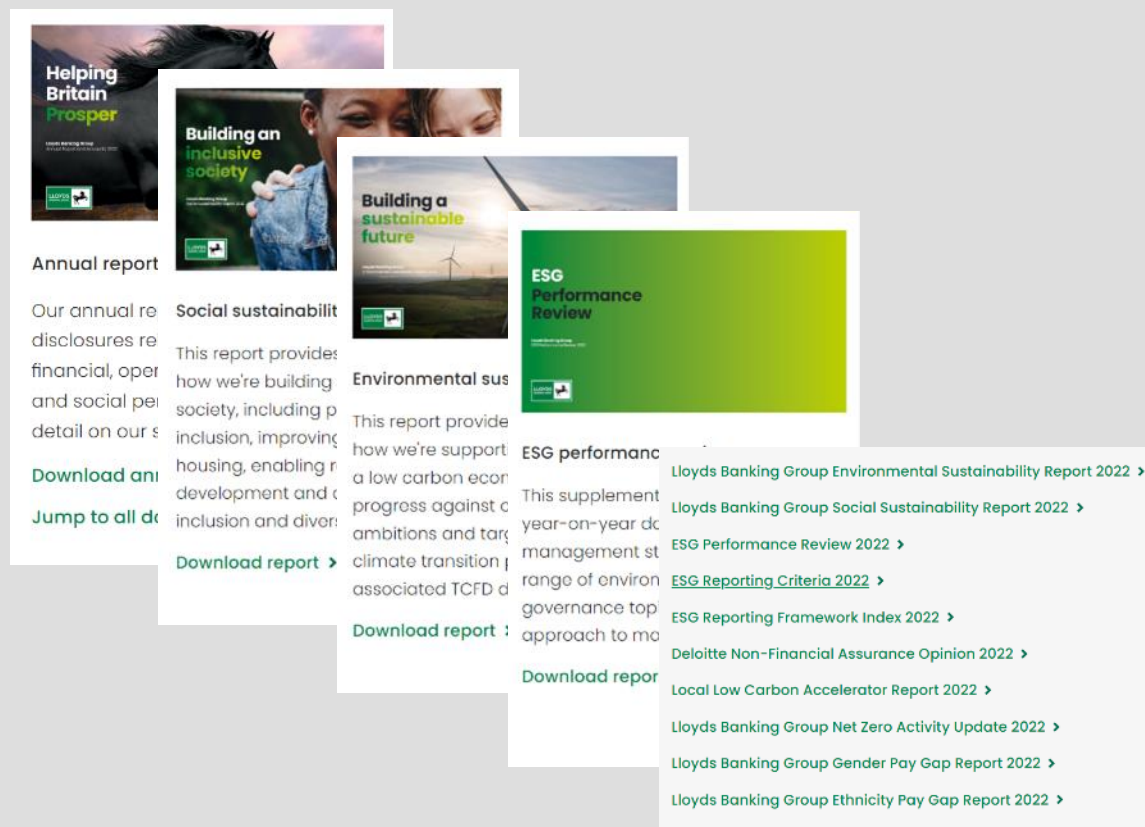


Examples of disclosures

Reporting practices

Lloyds Banking Group publishes several documents at once to make it easy to present a large amount of information. Among them are reports on the wage gap, carbon neutrality, etc.

BP shares many documents, including reports on diversity and inclusion, taxes, regions of presence, as well as downloadable ESG data in various formats.





6

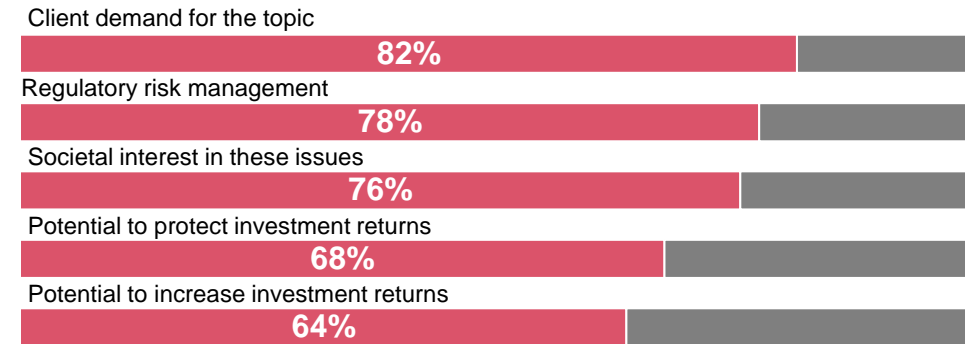
Addendum 1: ESG Risks

Building trust: The importance of ESG risk management disclosures

In a changing environment and growing expectations of society, as well as rapidly evolving sustainability legislation, it becomes necessary for companies to draw up robust policies, procedures and strategies that effectively manage new risks and take advantage of emerging opportunities.

Investors are best aware of this need, since they must take into account the views and interests of various stakeholders when making important investment decisions. This not only improves the quality of their investment strategies, but also supports a deeper understanding of the wide range of industries and sectors in which they invest. Today, capital providers are paying special attention to ESG risk management.

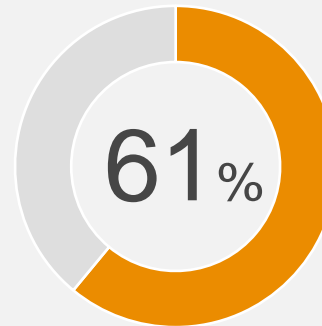
% of respondents who think these factors moderately, largely or very largely drive investor interest in ESG investing



Source: PwC Global Investor Survey 2022

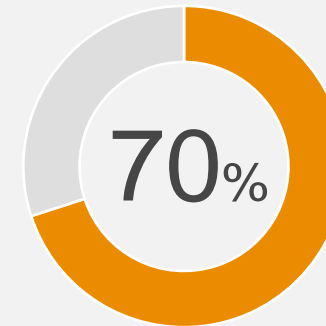
79% investors note that how a company manages ESG risks and opportunities is an important factor in their investment decision-making

(PwC, 2021)



Source: PwC Global Investor Survey 2022

share of investors who moderately, largely, or very largely use companies' ESG disclosures when assessing how companies are managing risks and opportunities



want to see the effect of sustainability risks and opportunities on the company's financial statement assumptions

A number of sustainability disclosure standards and regulations shifting from voluntary to mandatory basis is growing around the world, and ESG risk management is an integral part of them

Reporting Standards:

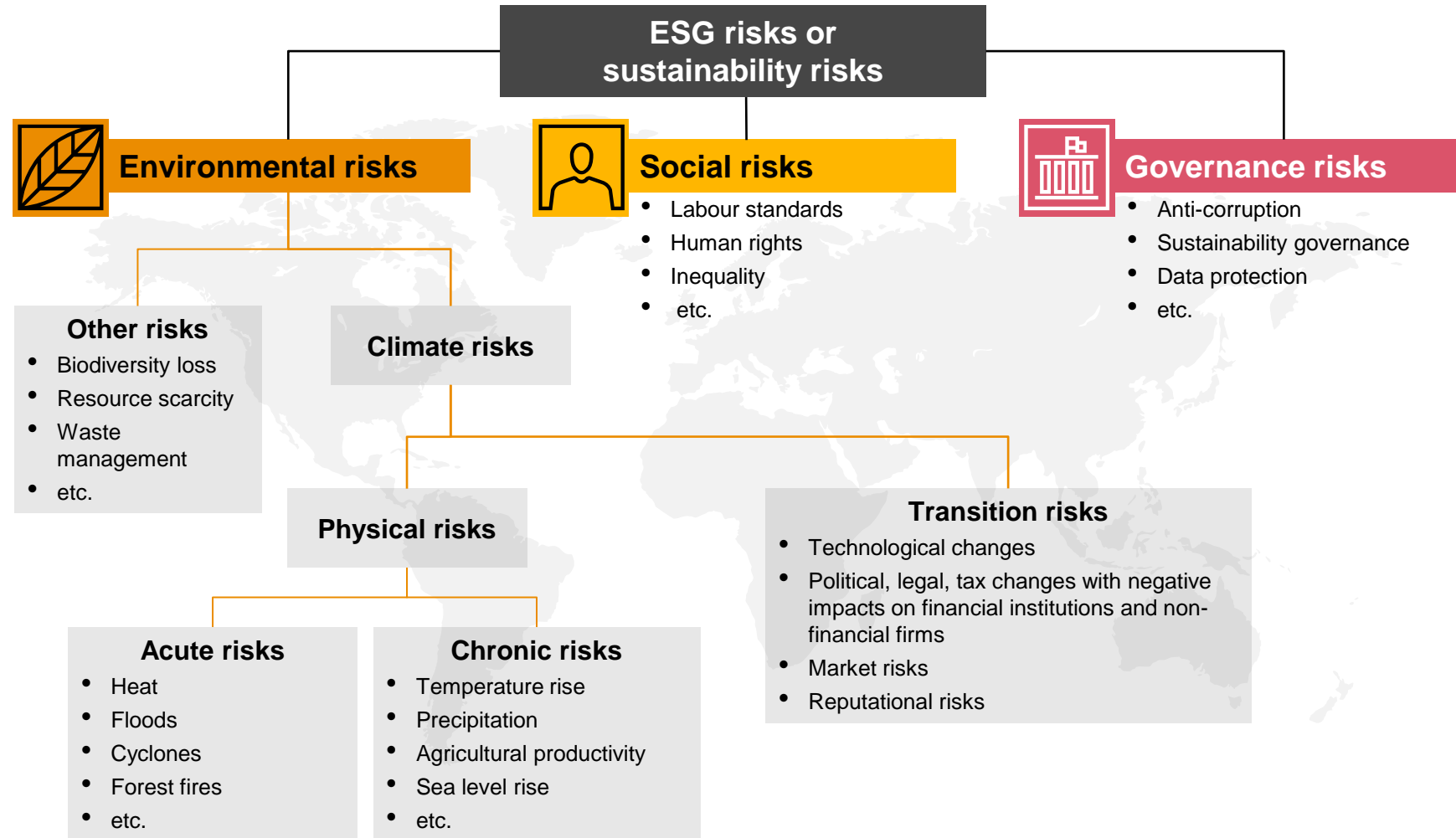
- IFRS Sustainability Disclosure Standards
- TCFD
- TNFD
- European Sustainability Reporting Standards

Standard-setting documents and recommendations

- EU Corporate Sustainability Reporting Directive (CSRD)
- Proposed new climate disclosure requirements from US Securities and Exchange Commission

Applying ESG beyond climate risks

ESG risks are the company's sustainability-related risks and opportunities arising in the course of interaction between the company and its stakeholders, society, economy and environment throughout the company's value chain, which are expected to impact company's cash flows, its access to finance or cost of capital in the short-, medium- or long-term



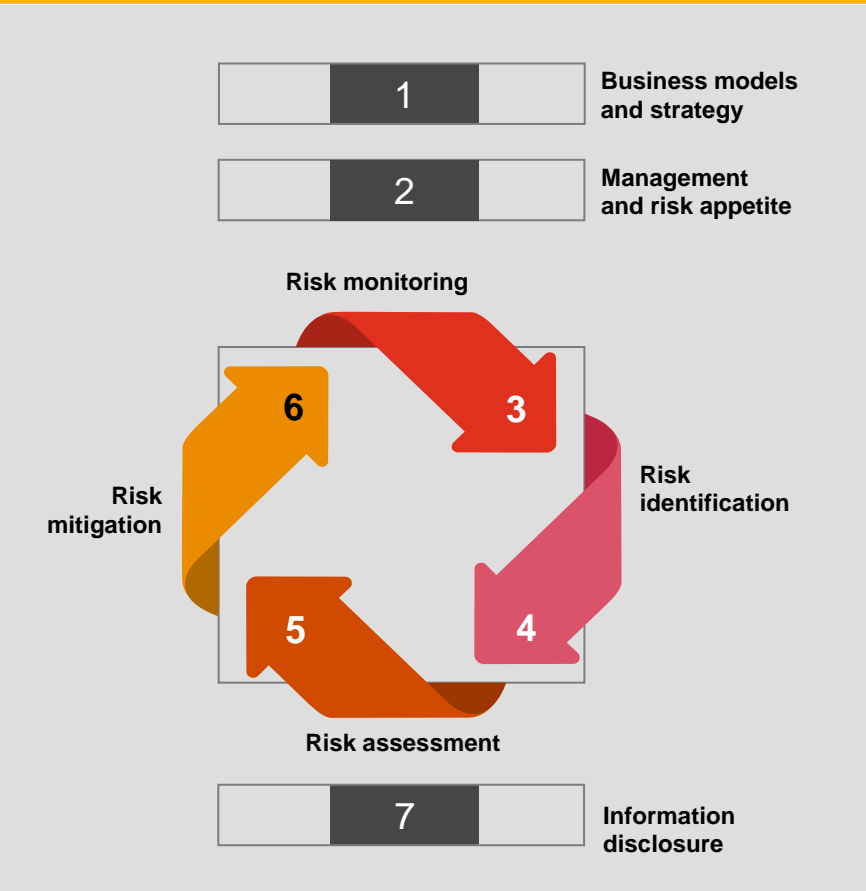
Improving the enterprise risk management system

Basic steps in ESG risk integration



PWC approach to integrating ESG risk management

Structural elements of the Risk Management System



Key considerations for ESG risks (non-exhaustive)

1

- Identify ESG risk factors that may affect the company
- Highlight ESG risks that are significant (short-term and long-term) from the point of view of business strategy
- The business strategy reflects ESG risks and applies to business areas

2

- Integrate ESG risks into the Risk Appetite Statement, including relevant key risk indicators
- Assign clear roles and responsibilities across the three lines of defense
- Adopt a holistic approach to managing ESG risk data and ensure that this data is collected

3

- ESG risk is explicitly integrated into the risk taxonomy
- ESG risks are considered in all core business processes and procedures of the company

4

- Risk prioritization to identify business processes and value chain stages that are most at risk. It also helps determine the urgency of required management actions. The findings serve as the basis for updating the Risk Appetite Statement and associated key risk indicators

5

- Incorporate climate-related scenarios to quantify the impact of physical and transition risks

6

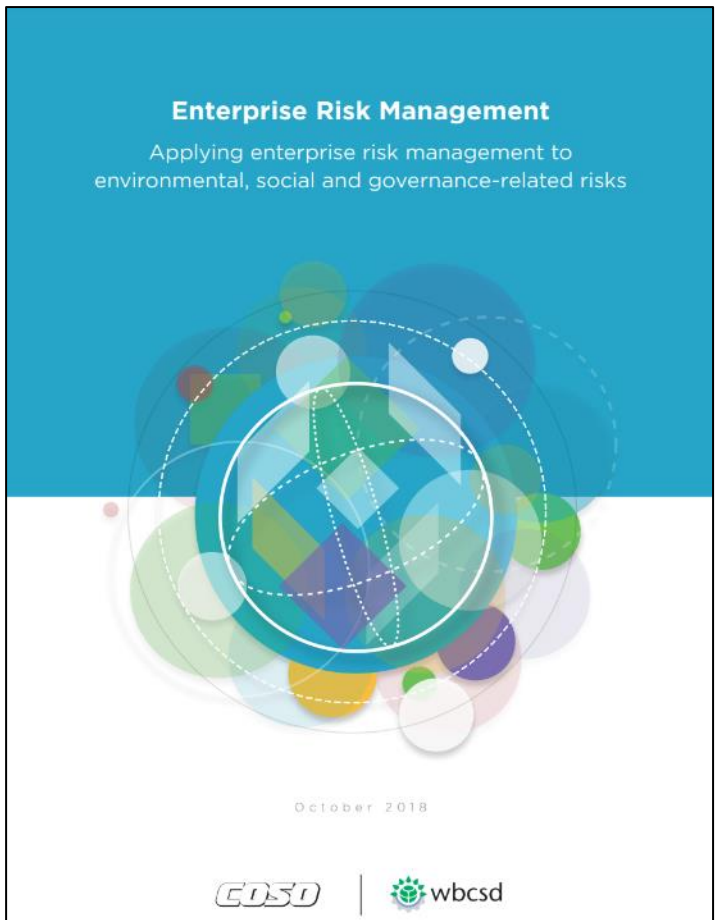
- ESG risks are considered as part of business continuity

7

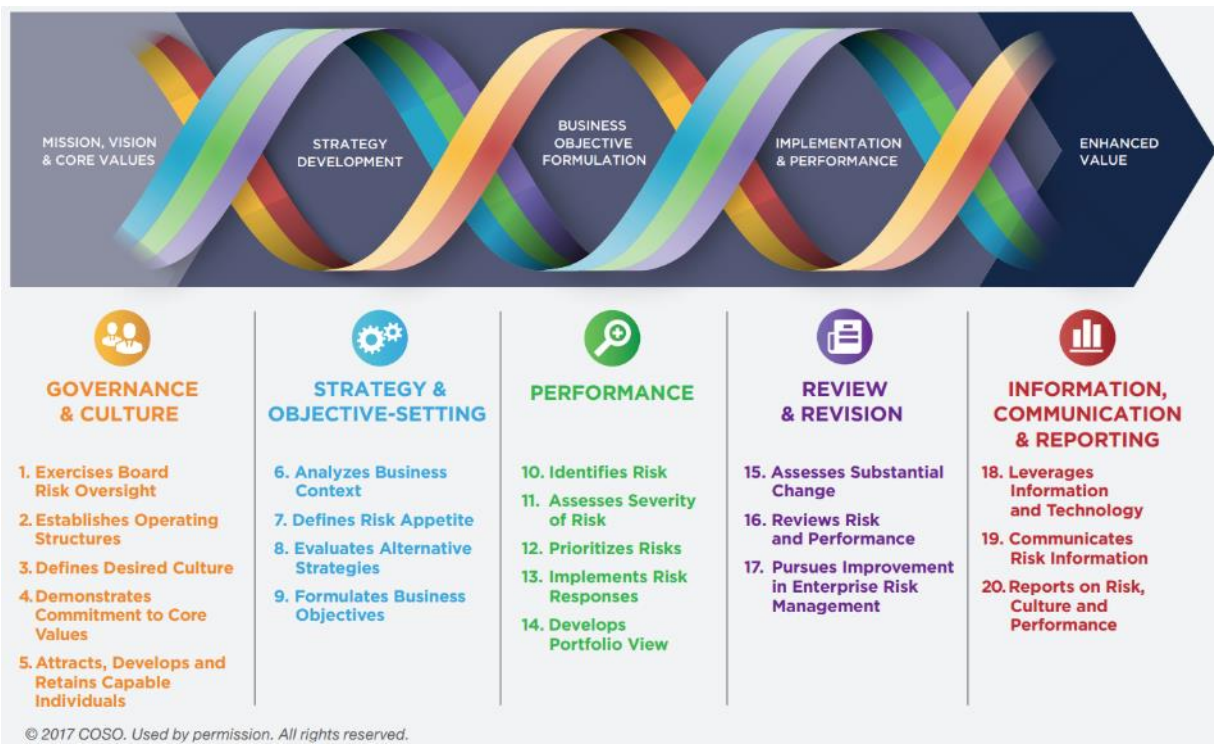
- Publish relevant information on the processes by which sustainability risks and opportunities are identified, assessed and managed. Also, disclose information on key indicators and outcomes.

An example of approach to managing ESG risks as part of enterprise risk management

In recent years, the concept of ESG risk as a risk similar to other types of financial risks has fostered the development of proactive sustainability risk management. This includes integrating ESG risk assessment into the Enterprise Risk Management (ERM) system



One of the commonly used ERM model is that developed by the Committee of Sponsoring organizations of the Treadway Commission (COSO). The model is effective for assessing ESG risk, covering activities and tasks in five key areas: from governance and strategic planning to execution, measurement and communication, with each of these areas having its own subcategories.



This guidance aims to help risk management and sustainability professionals apply ERM concepts and processes to ESG-related risks.

Source: Committee of Sponsoring organizations of the Treadway Commission (COSO) and World Business Council for Sustainable Development (WBCSD)



7

Addendum 2: ESG Reporting Standards

Trends in the development of ESG reporting standards



Key directions for changes in the approach to disclosure

Climate change

There is still the increased demand from stakeholders for information related to climate change.

Climate-related financial disclosure is on the sustainability agenda of many organizations thanks to the establishment of the International Sustainability Standards Board (ISSB) and the work done by the Task Force on Climate-related Financial Disclosures (TCFD).

Quality of information disclosed

Stakeholder concerns about greenwashing undermine the credibility of what companies say about their progress in managing sustainability risks and opportunities.

Data quality becomes critical. The requirement for data transparency is the desire of stakeholders to ensure that the information provided is accurate and not misleading

Regulatory requirements

In the corporate landscape, there has been a significant increase in mandatory ESG reporting requirements, especially in the European Union and the United States. In the EU, the CSRD Directive has become the latest regulatory framework relating to ESG and non-financial reporting.

The US is also on the verge of legislative changes. The Securities and Exchange Commission (SEC) has introduced rules to require climate risk disclosure starting in fiscal year 2023 (for certain companies).

More than just the environment

While the climate agenda is definitely leading the way, expectations around environmental, social and governance reporting are changing.

Expectations for company reporting in other key areas, such as human rights, diversity and inclusion, and community engagement, are rising, and companies need to prepare to meet these expectations.

Disclosure across the entire value chain

The need to disclose sustainability risks across the entire Value Chain (VC), as well as Scope 3 emissions, is increasing and will continue to be a challenging area for many.

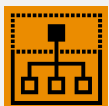
To make these disclosures, companies need to work with clients and suppliers to collect accurate data. Communication, collaboration and shared goals are key to achieving successful disclosure of this information.

The Taskforce on Nature-related Financial Disclosures



The Taskforce on Nature-related Financial Disclosures (TNFD), has developed a set of disclosure recommendations and guidance for organizations on reporting and acting on changing nature-related impacts, risks and opportunities.

Disclosure as per TNFD recommendations consists of 4 main pillars:



Governance: disclosure the organization's governance of nature-related dependencies, impacts, risks and opportunities.



Strategy: disclose the effects of nature-related dependencies, impacts, risks and opportunities of the organization's business-model, strategy and financial planning where such information is material.



Risk and Impact Management: describe the processes used by the organization to identify, assess, prioritise and monitor nature-related dependencies, impacts, risks and opportunities.



Metrics and Targets: disclose the metrics and targets used to assess and manage material nature-related dependencies, impacts, risks and opportunities.

TNFD recommendations are based on the recommendations of the guidelines for climate-related disclosures (**TCFD**), consistent with the standards of the International Sustainability Standards Board (**ISSB**) and the impact materiality assessment approach used by the Global Reporting Initiative (**GRI**).

The Taskforce consists of **40 senior executives** from financial institutions, corporates and market service providers with a **market capitalisation of over USD 2.3 trillion, over USD 20.6 trillion in assets under management** and offices in **over 180 countries**

June, 2021

Formal launch of the TNFD. The TNFD Recommendations are officially included in the G20 Sustainable Finance Roadmap.

June, 2023

Conclusion of pilot testing. Over 3,400 pieces of feedback received, including from 200 pilot tests by market participants.

March, 2022

The first beta version of the TNFD Framework was released.

September, 2023

Final TNFD Recommendations and additional guidance launched.



In June 2023, IFRS together with ISSB published its new global sustainability disclosure standards IFRS S1 and IFRS S2. The standards are effective for reporting periods beginning January 1, 2024.

IFRS S1 General Requirements - Disclosures of Sustainability-related Financial Information.

IFRS S1:

- requires to disclose material information about its **sustainability-related risks and opportunities** together with the general purpose financial reports to inform investors;
- applies the **TCFD framework**: governance, strategy, risk management, metrics and targets;
- requires **industry-specific disclosures** based on SASB standards;
- for non-climate issues (IFRS S2), contains **links to resources** to help companies identify and understand sustainability risks and opportunities;
- can be used with any **accounting requirements**.

IFRS S2 Climate-related Disclosures - Disclosures of climate-related risks and opportunities.

IFRS S2:

- includes **TCFD recommendations**;
- Is used **in compliance with IFRS S1**;
- requires disclosure of material information about **climate-related risks and opportunities**, including physical and transition risks;
- provides **relief for certain requirements in the first year** a company applies the standards. For example, an entity has the option to limit disclosure of climate-related risks and opportunities and is not required to disclose Scope 3 greenhouse gas emissions when applying IFRS S2.
- requires **industry-specific** disclosures supported by accompanying guidance based on **SASB standards**.



1. Governance



Under this pillar, an entity would disclose information about **governance processes, controls and procedures used to monitor and manage sustainability-related risks and opportunities for IFRS S1, and climate-related risks and opportunities for IFRS 2**

3. Risk Management



Under this pillar, an entity would disclose information about **the process, or processes, used to identify sustainability-related risks and opportunities for IFRS S1, and climate-related risks and opportunities for IFRS S2.**

2. Strategy



Under this pillar, an entity would disclose information about **its strategy in relation to significant sustainability-related risks and opportunities for IFRS S1, and climate-related risks and opportunities for IFRS S2.**

4. Metrics and Targets



Under this pillar, an entity would disclose information that enables users to understand **how the entity assesses, controls and manages its significant sustainability-related risks and opportunities for IFRS S1, and climate-related risks and opportunities for IFRS S2.**



Sustainability Accounting Standards Board (SASB)

The ISSB builds upon **SASB industry standards** and adopts SASB industry approach. The ISSB encourages companies and investors to continue to support and use SASB standards **until they are replaced by IFRS standards**.



SASB was founded in 2011, its main objective is to provide a minimum level of disclosure standardized across sectors/industry.



The target audience of the SASB standards includes investors, lenders and other sources of financial capital. This is due to the fact that these stakeholders are putting more attention to the impact of environmental, social and governance (ESG) factors on the financial performance of companies necessitating the need for standardized reporting on ESG data.



SASB Standards are developed using the definition of “materiality” applied under the U.S. federal securities laws. A matter is material if “there is a substantial likelihood” that a “reasonable investor” would consider its omission or misstatement to be “a significant change in the total mix of information”.



SASB takes into account the specific characteristics of the industry and has currently developed standards for 77 industries across 11 sectors of the economy.





Corporate Sustainability Reporting Directive

The Directive, which came into force on 5 January 2023, modernizes and strengthens the rules concerning the social and environmental information that organizations must report.

WHAT FOR

The **goal** is to drive change in business practices by encouraging companies to relate sustainability topics to financial opportunities and risks, as well as social and environmental impacts, and to disclose strategies and plans for managing sustainability indicators alongside financial performance.

WHEN

The timing will depend on the entity type, and will be **implemented in stages**. Timelines are most urgent for EU entities, for them disclosure requirements apply as early as 2024 (submission of documents in 2025).

WHO

All companies **listed on EU regulated markets** and **major unlisted companies** (may include multinational companies based outside the EU). This is expected to affect around 50,000 **companies worldwide/10,000 companies headquartered outside the EU**.

WHERE

Disclosures must be **integrated** into the management report (or consolidated sustainability report for non-EU companies), prepared in a single electronic format and digitally labeled.

WHAT

Disclosure of information in four areas: **Governance; Strategy; Impact, Risk and Opportunity Management**, as well as **Metrics and Targets**. Requirements for disclosure of information about how sustainability issues affect the company's business, as well as the impact of business activities on people and the environment.

HOW

Sustainability information will be required to be disclosed with the same level of rigor as their accompanying financial statements. Directors have clear responsibilities and the tasks of audit committees must be expanded, with limited assurance required; subsequent transition to reasonable certainty.

European Sustainability Reporting Standards

Companies subject to the CSRD will have to report according to European Sustainability Reporting Standards (ESRS). The standards draft was developed by EFRAG, and contains 12 ESRS standards across four broad categories:

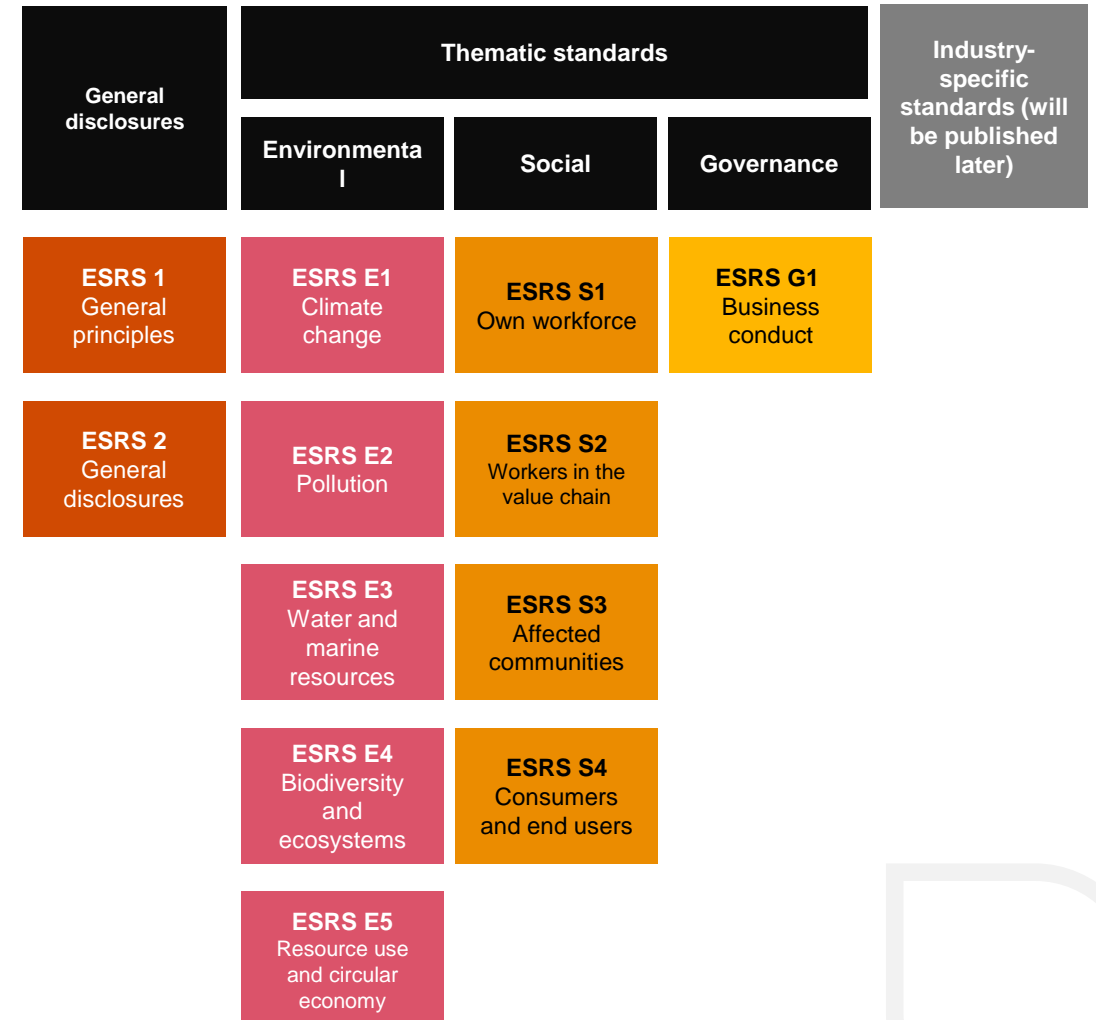
- **General disclosures:** general principles, general provisions, strategy, governance and materiality management (ESRS 1, ESRS 2)
- **Environmental:** climate change, pollution, water and marine resources, biodiversity, resource use and circular economy (ESRS E1-E5)
- **Social:** own workforce, workers in the value chain, affected communities, consumers and end users (ESRS S1-S4)
- **Governance:** governance, risk management, internal control and keeping business (ESRS G1)

Industry-specific standards are currently being development and will be published later.

EFRAG uses a four-pillar approach, similar to the **framework used by TCFD and ISSB:**

- Governance;
- Strategy;
- Impact, risk and opportunity management; and
- Metrics and targets.

Source: [European Commission website](#), [PwC reserach](#)



Common reporting standards for non-financial information



Global Reporting Initiative (GRI)

Global Reporting Initiative standards are widely used in all industries and allows stakeholders to understand activities of the company, which demonstrates its impact on the economy, environment and society.

The GRI standards are comprising three series of Standards:

- **Universal Standards** include reporting principles and general disclosures (GRI 1: Foundation, GRI 2: General disclosures, GRI 3: Material topics).
- **Topic Standards** aim to report specific information on your material topics.
- **Sector Standards** for adaptation to industry specifics. The Standards list topics that are likely to be material to most organizations in the sector and set out appropriate disclosures for those topics..

EFRAG and GRI have achieved a **high level of interoperability** between their environmental impact reporting standards. This **avoids the need for companies to submit double reporting** and creates a convenient reporting system.



Task Force on Climate-Related Financial Disclosures |

The TCFD Principles are a framework that organizations can use to publicly disclose climate-related risks and opportunities for their business.

The TCFD concept consists of four themes:

- Corporate governance;
- Risk management;
- Strategy;
- Metrics and goals.

Key features of TCFD recommendations:

- Designed to provide forward-looking information on the financial impacts of climate change useful for decision-making;
- Strong focus on the risks and opportunities associated with the transition to a low-carbon economy.

The number of TCFD supporters surpasses **4,800 organizations** with a combined market capitalization of USD29.5 trillion.

From 2024, due to the approval of IFRS standards, **TCFD standards will no longer be used independently**, and are part of IFRS S1 and S2 disclosures.

TOP-50 of ESG Information Disclosure Rating



Top 50 ESG Disclosure Companies

Position 2022	Company
1	NC KazMunayGas
2	NAC Kazatomprom
3	QazaqGas
4	Samruk-Energy
5	Karachaganak Petroleum Operating B.V
6	Kazakhtelecom
7	NC Kazakhstan Temir Zholy
8	Altynalmas JSC
9	KEGOC
10	KazTransOil
11	Air Astana
12	Joint Venture Inkai
13	Jusan Bank
14	Halyk Bank of Kazakhstan
15	Nostrum Oil & Gas
16	NMC Tau-Ken Samruk
17	Samruk-Kazyna
18	NMH Baiterek
19	Kazakhstan Development Bank
20	CAEP (Central-Asian Electric Power Corporation)
21	PAVLODARENERGO
22	Kazpost
23	Kazakhstan Utility Systems
24	KazAgroFinance
25	SevKazEnergo

Position 2022	Company
26	Otbasy bank
27	Transtelecom
28	Zhaikmunai
29	NCOC
30	Samruk-Kazyna Ondeu
31	Kazakhstan Housing Company
32	Batys transit
33	Kaspi.kz
34	Qazaqstan Investment Corporation
35	NC Food Contract Corporation
36	KMK Munai
37	Kazakhmys Copper
38	KazAzot
39	Almaty power plants
40	Samruk-Kazyna Construction
41	Kcell
42	MREC (Mangistau Regional Electricity Network Company)
43	Bereke Bank
44	Atameken-Agro
45	ForteBank
46	KazTransGas Aimak
47	Korem
48	Export Insurance Company "KazakhExport"
49	AstanaGas KMG
50	Ust-Kamenogorsk Titanium and Magnesium Plant

Best by sector (1/2)



The tables below show top companies by level of ESG disclosure in each sector

Top financial companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	13	Jusan Bank	C
2	14	Halyk Bank of Kazakhstan	C
3	18	NMH Baiterek	C

Top oil and gas companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	1	NC KazMunayGas	A
2	3	QazaqGas	B+
3	5	Karachaganak Petroleum Operating B.V	B+

Top mining companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	2	NAC Kazatomprom	B+
2	8	Altynalmas JSC	B
3	12	Joint Venture Inkai	C

Top energy companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	4	Samruk-Energy	B+
2	9	KEGOC	B
3	20	CAEP (Central-Asian Electric Power Corporation)	C

Best by sector (2/2)



The tables below show top companies by level of ESG disclosure in each sector

Top transport and logistics companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	7	NC Kazakhstan Temir Zholy	B
2	11	Air Atana	B
3	22	Kazpost	C

Top companies from the agricultural and food industry by ESG disclosure level

Position	In overall ranking	Company	Rating
1	35	NC Food Contract Corporation	D
2	44	Atameken-Agro	D
3	57	AsiaAgroFood	D

Top telecommunications companies by ESG disclosure level

Position	In overall ranking	Company	Rating
1	6	Kazakhtelecom	B+
2	27	Transtelecom	D
3	41	Kcell	D

Top companies from other sectors by ESG disclosure level

Position	In overall ranking	Company	Rating
1	17	Samruk-Kazyna	B
2	30	Samruk-Kazyna Ondeu	C
3	38	KazAzot	D

Key Takeaways



ESG strategy

Separately highlight ESG risks and describe the process for their identification, assessment and management

Adapt your corporate strategy to ESG risks

Incorporate the entire value chain in strategy and risk management, define coverage for individual indicators



[E]nvironment

Describe the management approach and evaluate progress on each significant aspect

Identify climate risks and opportunities and describe the process for managing them

Assess the nature and extent of impacts on the ecosystem, identify associated risks and opportunities



[S]ocial

Place an emphasis on specific initiatives and results when describing social issues

Develop methodology and metrics to identify social risks and assess impacts

Carry out work on assessment, strategy setting, monitoring and communications related to risks of human rights violations

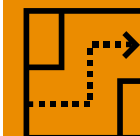


[G]overnance

Share how sustainable development management is being carried out and how it influences decision making

Integrate sustainability principles into corporate governance through specific initiatives

Describe the approach to responsible business conduct and its integration into business processes



Reporting practices

Develop a holistic approach to disclosure of information by drawing up a reporting strategy

Ensure the quality of non-financial information through data automation and comparable methodologies

Adapt reporting to evolving trends and expectations, consider introduction timelines for new disclosures

Report Evaluation Methodology and Criteria



Methodological basis (1/4)

What did we evaluate?

As part of this study, we evaluate the quality and availability of ESG information in the public reporting of Kazakhstani companies.

The analysis is based on annual reports and sustainability reports (and their equivalents, including integrated reports, sustainability and social responsibility reports), hereinafter collectively referred to as “Reports”. When compiling the current Rating, the **Reports prepared by companies based on the results of their activities for 2022** were evaluated.

The evaluation criteria include five main disclosure pieces (hereinafter collectively referred to as the “**Analysis of the Five**”):

- ESG strategy,
- corporate governance,
- social policy,
- environmental impacts,
- reporting practices.

Additional scores were awarded for the clarity and quality of the presentation of information.

Any Kazakhstani company with a suitable report for evaluation could apply to participate in the project. We also include publicly available reports that we consider important for the completeness of the analysis.

Our approach includes an analysis of the availability of quantitative and qualitative indicators, that reflect the impact of the organization's activities on social and environmental aspects, and an approach to manage these impacts. In addition, we pay our attention to the disclosure of strategies, policies and the integration of sustainable development issues into the corporate governance system.



Methodological basis (2/4)



Rating calculation

- The methodology includes 129 criteria; a score is given for each criterion (from 1 to 10).
- The final rating functional is calculated as a weighted average of ratings by criteria.
- Depending on the score, the company is assigned an appropriate ESG disclosure level rating.
- It is worth remembering that if the documents had low readability or poor navigation the assessment could not accurately reveal its disclosure.

Disclosure rating	Rating functional	Characteristics
A+	>9–10	Level of leading international practices (the level of information disclosure in the company complies with the main criteria accepted in world practice)
A	>8–9	High level (the company demonstrates a high level of information disclosure, which requires only partial improvements to comply with international practices)
B+	>7–8	Good level (the company presents a good level of content/detailing and disclosure on ESG aspects, demonstrating regional leadership, has the least number of requirements for transition to best practice)
B	>6–7	Developing level (the company demonstrates good progress in disclosing ESG information, has a high potential for transition to best practices)
C	>5–6	Basic level (despite the beginning of the practice of disclosing ESG information, the level of disclosure is insufficient and requires significant development)
D	below 5	Low level (minimum disclosure of key ESG indicators, requires a new approach to reporting)

Methodological basis (3/4)

Rating restrictions

- The Rating assumes only an evaluation of information disclosure and cannot show the level of implementation of sustainable development practices in the evaluated companies.
- This Rating contains information obtained from public sources. PwC has not attempted to establish the reliability of these sources and has not verified the information provided. Accordingly, PwC makes no representations or guaranties of any kind (whether explicit or implied) as to the accuracy or completeness of the information provided in the annual and sustainability reports.
- If we have reason to believe that the company's report is misleading to readers and the information presented in the report does not correlate with facts and public statements, we reserve the right to downgrade the company's report by assigning it a penalty point (s) from -1 to -3, or completely exclude the report from the list.
- The evaluation sample is prepared based on information in open sources, as well as based on submitted applications for participation in the study. At the same time, we assume that this research did not include all existing reports worthy of being included on the list. Therefore, we recommend that companies apply for participation in the Rating themselves to prevent the risk that their report not be included in the final list.



Methodological basis (4/4)



Quality management



- To evaluate the Reports as part of the Rating, we had our group of experts with the necessary qualifications in the disclosure of ESG information, and who underwent the appropriate briefing on the evaluation procedure.
- The PwC Kazakhstan qualified team that evaluated the Reports was guided by an established evaluation process and methodology criteria developed by PwC methodologists to avoid personal judgments and maintain impartiality. Members of the expert team did not have access to the consolidated Rating with the results of their assessment and transferred the assessments to a dedicated specialist who prepared a sorted list without making changes to the assessments of individual companies. As such, no member of the expert team controlled the final position of companies in the Rating.
- The results of the evaluation of experts were re-checked by an independent specialist for compliance with the methodology. As such, objectivity in the assessment and adherence to the methodology are preserved.

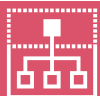
Changes in methodology in 2023



This year we have essentially **updated the methodology for compiling** the ESG/Sustainability Disclosure **Rating**.

We have made a number of changes to bring our methodology in greater alignment with **recent trends in ESG reporting standards** (including ISSB and CSRD (EFRAG)), and have taken into account our previous evaluation experience and feedback received.

Major changes include the following:



Sector-specific characteristics

- Now, the evaluation takes into consideration the specific characteristics of a particular sector. We have increased the weights of topics that are material for individual sectors and added a number of sector indicators.
- The weight of sector-related topics averages 40-56%.
- Sector-specific characteristics make it possible to take into account the specific features of the organization's business profile.



Management approaches

- For each core ESG topic, we have added metrics that describe management's approach and strategy for that topic.
- Within these indicators, we evaluate a company's overall approach to managing potential or actual adverse economic, environmental and social impacts for each key aspect of sustainability.



Climate risks

- We have added additional indicators on climate risk management and sustainability risk management.
- The criteria include the role of supreme authorities in risk oversight, processes for identifying and managing significant risks, risk disclosure, and the conduct of scenario analysis



Data verification

- Today, there is a great request among investors and other stakeholders to have a reliable ESG information, so verification and external assurance are of particular importance. In this regard, we have increased the weight of the "Ensuring the reliability of reporting" indicator. The fact that the report had been verified will play a more significant role in the final evaluation.

Availability of information on the below items was evaluated



Key elements of a Sustainable Development Strategy

- Mission/goal
- Business model
- Description of sustainable development issues
- Sustainable development material topics for the company
- Process for identifying material topics
- Qualitative/quantitative sustainable development goals
- Map of key stakeholders (or list)
- Stakeholder engagement process
- Measures taken in response to issues raised by the stakeholders during the engagement process
- UN Sustainable Development Goals (SDs) commitment statement
- List of SDGs relevant for the company
- List of specific initiatives for each SDG



Availability of information on the below items was evaluated



Key elements of the governance system and governing bodies

- Management structure
 - Number and share of independent directors in the Board of Directors
 - Structure of the Board of Directors by social groups
 - Balance of competencies of the members of the Board of Directors
 - Composition by terms of tenure of the members of the Board of Directors
 - Description of selection and appointment procedures
 - Approach and measures to improve the qualifications of members of the Board of Directors
 - Description of the conflict of interest management policy
 - Approach and measures to evaluate the Board of Directors
 - Governing bodies responsible for making decisions in the area of sustainable development
 - Engagement process between supreme governing bodies and stakeholders
 - Description of the role of the Board of Directors and the executive body in the development, monitoring and approval of strategies and policies by key areas in sustainable development area
 - Remuneration of the Board of Directors and the executive body
 - Integration of sustainability-related indicators into the Board of Director's remuneration scheme
 - The ratio of the annual remuneration of the highest paid employee of the organization to the median remuneration of all employees
 - Anti-Corruption Policy
 - Communications and trainings on anti-corruption issues
 - Confirmed incidents of corruption in the reporting year
 - Description of procedures for filing complaints about illegal and unethical behavior
 - Basic provisions of corporate ethics
 - Training in the principles (Code) of ethical business conduct for employees, business partners and other relevant parties
 - External auditor determination and engagement process
 - Approach to non-audit services and share of remuneration for non-audit services
 - Dividend policy
 - Fines and non-financial sanctions for violating the law
 - Risks by sustainable development aspects
 - Processes for managing sustainable development-related risks and opportunities
- For financial companies only:**
- Approach to incorporating environmental, social and governance (ESG) factors into credit analysis or investment activities

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



HR management

Management approaches

- Description of HR policy, the company's approaches to HR management
- Employee engagement processes to receive feedback
- Channels for reporting complaints and appeals for employees
- Measures to improve the situation, reduce negative impacts, and improve conditions for employees
- Monitoring the effectiveness of the work done on this aspect of sustainable development
- Description of the equal opportunity policy and specific non-discrimination measures

Indicators

- Headcount
- Personnel breakdown
- Employee turnover
- Number of employees hired in the reporting year
- Share of temporary employees
- Average number of training hours per employee in the reporting year
- Number of employees who took maternity/paternity leave in the reporting year
- The ratio of the average salary of women to the average salary of men



Other aspects

- Approaches to occupational health and safety
- Injury rates
- Percentage of employees covered by collective bargaining agreements
- Human rights approach and how this is reflected in organizational policies
- Investments in infrastructure and services that benefit society
- Approach to managing risks and opportunities related to the rights and interests of communities in the regions in which business is conducted
- Description of tax policy and strategy
- Spending on local suppliers
- Sustainability evaluation and requirements for suppliers
- Approaches (or policies) to ensuring personal data protection

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



Financial inclusion (for financial companies only)

- Scope and number of financial products (loans, insurance products, etc.) provided to small businesses and to support society
- Strategy or plans to expand financing for inclusive products
- Scope of “green” financing for products supporting the fight against climate change and environmental protection
- Financial literacy programs for clients at social risk
- Policies and approaches for the responsible design of financial products and their marketing and sales



Environmental impacts (1/4)

Evaluation criteria

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



Climate change

Management approaches

- Policy/approach to manage climate change/greenhouse gas emissions and energy consumption
- Actual and potential, negative and positive impacts on the economy, environment and people in the area of climate change
- Actions aimed at reducing negative impacts associated with this aspect of sustainable development
- Monitoring the effectiveness of the work performed on this aspect of sustainable development

Risk Management

- The role of supreme governing bodies in overseeing climate change risks and opportunities
- Climate change risks and opportunities that have been identified by the organization
- Processes for managing climate change risks and opportunities
- Climate-related scenario analysis

Indicators

- Greenhouse gas emissions in CO2 equivalent (Scope 1)
- Volume of indirect greenhouse gas emissions in CO2 equivalent (Scope 2)
- Volume of other indirect greenhouse gas emissions in CO2 equivalent (Scope 3)
- Approach to applying internal carbon pricing
- Consumption of fuel and energy resources for three years (including electricity and heat, as well as fuel, etc.)
- Work to reduce the consumption of fuel and energy resources

Emissions financed (financial companies only)

- Volume of emissions financed
- Portfolio exposure to high-emitting industries

Environmental impacts (2/4)

Evaluation criteria

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



Air pollution

Management approaches

- Policy/statement on approaches to managing air pollution issues and preventing harmful impacts and incidents
- Approach to identifying and assessing impacts on ecosystems and society
- Actions aimed at reducing negative impacts associated with this aspect of sustainable development
- Monitoring the effectiveness of work performed on this aspect of sustainable development

Indicators

- Emissions of air pollutants over three years



Environmental Management System

- Information on certified environmental management systems such as ISO



Water resources management

Management approaches

- Policy/statement on approaches to managing impacts associated with the use of water resources
- Approach to identifying and assessing impacts on ecosystems and society in this aspect, and the main impacts
- Actions aimed at reducing the consumption of water resources and reducing negative impacts on ecosystems
- Monitoring the effectiveness of the work performed on this aspect of sustainable development

Indicators

- Volume of water intake (consumption from external sources) over three years
- Water discharge over three years

Environmental impacts (3/4)

Evaluation criteria

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



Waste management

Management approaches

- Policy/statement on approaches to managing waste-related negative impacts
- Actual and potential, negative and positive impacts on the economy, environment and people Actions aimed at reducing the negative impacts associated with this aspect of sustainable development
- Monitoring the effectiveness of work performed on this aspect of sustainable development

Indicators

- Volume of waste generation over three years (excluding atmospheric emissions and water discharges)
- Segregation of waste by treatment methods (with allocation of disposal volumes)



Biodiversity

Management approaches

- Policy/statement on approaches to managing issues of biodiversity impact
- Approach to identifying and assessing biodiversity impacts
- Actions aimed at reducing the consumption of water resources and reducing negative impacts on ecosystems
- Monitoring the effectiveness of the work performed on this aspect of sustainable development

Indicators

- Nature of significant direct and indirect biodiversity impacts
- Operating sites owned, leased or managed in and/or adjacent to protected areas and areas of high biodiversity value outside protected areas
- Total number of IUCN Red List species and species specified in the national habitat protection list in the areas affected by the organization's activities

Environmental impacts (4/4)

Evaluation criteria

Availability of information on the below items was evaluated. The relevance of the indicator for the company is taken into account, considering the profile of its activities.



Tailings dam management (for mining companies only)

- Total volume of tailings generated
- Data on tailings dam facilities. Including location, operational status, fill volume, etc.
- Description of tailings dam management systems and the management structure used to monitor and maintain tailings dam stability



Energy indicators (energy sector only)

- Management approach to ensure short- and long-term power availability and reliability
- System Average Interruption Frequency Index per calendar year (SAIFI)
- Average electricity rates for retail and business clients
- Percentage of load served by smart grid technology
- Percentage of energy loss



Telecommunications indicators (for the telecommunications sector only)

- Materials received as part of stock returns programs
- Average actual sustained download speed, including measurement methodology
- Average duration of communication failures by system and average frequency of communication failures by system
- Work to expand access to telecommunications services



Availability of information on the below items was evaluated.



Reporting practices

- Statement of adherence to GRI or SASB Standards (including the Disclosure Index)
- Statement of adherence to TCFD (including disclosure of climate change-related risks and opportunities)
- Adherence to ISSB Standards
- Is ESG information published by July 31 of the following reporting year?
- Is ESG information separate from other information and easily accessible for review?
- Presentation of information: quality of design, navigation, ease of obtaining and reading data



External assurance

- External assurance of non-financial information and its scope



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