



OCCUPATIONAL HEALTH AND SAFETY

The Company’s highest priority is preserving the life and health of its employees. Kazakhtelecom JSC adheres to a responsible approach to occupational health and safety in its operations.

MANAGEMENT APPROACH

GRI 3-3

The key focus areas of Kazakhtelecom JSC’s Development Strategy remain the creation of comfortable working conditions for employees, as well as the mitigation of risks related to production activities and the occurrence of emergencies.

The Company strives to provide safe and comfortable working conditions and fosters a culture of personal responsibility for health and safety in the workplace.

Kazakhtelecom JSC aims to comply with the best international standards in occupational safety, strictly adheres to national and international requirements, and continuously improves its Occupational Health and Safety Management System.

The key document regulating occupational health and safety (OHS) activities is the Occupational Health and Safety Policy of Kazakhtelecom JSC. The Policy applies to all employees and contractors of the Company.

Kazakhtelecom JSC’s top priorities in the field of OHS:

- › Ensuring compliance with and application of the Labour Code of the Republic of Kazakhstan;
- › Providing safe working conditions and workplaces;
- › Implementing modern technologies and best practices in occupational health and safety;
- › Introducing modern tools and methods for preventing workplace injuries and occupational diseases.

The main internal documents governing Kazakhtelecom JSC’s occupational health and industrial safety management system include:

- › Occupational Health and Safety Policy;
- › Collection of safety and occupational health instructions by type of work in TCO LS;
- › Collection of safety and occupational health instructions by profession for Local Network Maintenance Centers of Kazakhtelecom JSC’s branches;
- › Technical requirements and specifications for special clothing and personal protective equipment at Kazakhtelecom JSC;
- › “Occupational Health and Safety Card” Program;

- › Incentive Regulation for Occupational Health and Safety;
- › Standard “Procedure for Reporting and Data Collection in Case of Work-Related Accidents and Potentially Hazardous Situations Subject to Investigation at Kazakhtelecom JSC”;
- › Kazakhtelecom JSC’s Vehicle Management Policy;
- › Travel and Driving Management Standard;
- › Approved OHS statistical reporting forms;
- › Rules for mandatory periodic medical examinations;
- › Rules for working under hazardous conditions using work permits;
- › Standard “Fire Safety Rules at Kazakhtelecom JSC”;
- › “Injury Prevention Team” Standard (developed in 2023);
- › Occupational Health and Safety Rules for Remote Work;
- › Documented Procedure “Emergency Preparedness and Response.”

› These documents are available on the Company’s website in the “Sustainable Development” section under “Occupational Health and Safety.”

MANAGEMENT STRUCTURE AND TOOLS

The Company operates the Occupational Safety Directorate (OSD) – a dedicated functional branch of Kazakhtelecom JSC.

The OSD is primarily responsible for the day-to-day management and coordination of the Company’s occupational health and safety activities.

› More details on the OSD’s functions are available in the Company’s [2022 Integrated Annual Report](#).

Heads of structural units of the Company’s Head Office and branches, as well as specially designated occupational and fire safety officers, are responsible for implementing emergency management procedures.

As part of the 2024–2028 Strategy for Developing the Occupational Safety Management System, the Company is carrying out initiatives to reduce accidents, achieve zero injuries, and train managers at all levels.



EMPLOYEE ENGAGEMENT IN OCCUPATIONAL SAFETY MANAGEMENT

GRI 403-2, 403-4

Kazakhtelecom JSC recognizes the vital role employees play in occupational safety management and in developing a strong safety culture. The Company actively involves its personnel in the design, implementation, and evaluation of the occupational health and safety system. Occupational safety and health committees have been established in all branches and at the Head Office, where employees collaborate to ensure compliance with OHS requirements, prevent workplace injuries and occupational diseases, and inspect working conditions and safety measures. In crisis situations, the Company forms a task force with participation from the OSD and the Civil Defense Headquarters to investigate and eliminate the crisis.

Kazakhtelecom JSC conducts monthly meetings with branch directors, structural unit representatives, and contractors to discuss ongoing and new OHS initiatives and programs. It has also introduced a practice of beginning all administrative and production meetings with a brief discussion on safety and occupational health.

Company employees also participated in sharing best practices through the HSE Committee platform organized by Samruk-Kazyna JSC at production sites of portfolio companies, with the aim of further replicating best practices at Kazakhtelecom JSC.

Additionally, an internal audit covering occupational safety and compliance with workplace standards was conducted across all structural units.

“Occupational Health and Safety Card” Program

Since 2022, Kazakhtelecom JSC has implemented the standard “Occupational Health and Safety Card” Program (OHS cards), designed to increase employee engagement in improving the OHS system.

The Program focuses on identifying and reporting hazardous production factors, unsafe working conditions, unsafe employee behavior, potentially dangerous situations, and near misses. It also allows employees to propose improvements in OHS.

The Program’s objective is not only to eliminate and control risks of injury or environmental/property damage but also to involve employees in enhancing production discipline and promoting a safety culture through the use of OHS cards at every workplace, site, and facility.

OHS cards are used to report and communicate on all matters related to occupational health, safety, and environmental protection. The system also allows tracking the resolution of reported issues, ensuring timely follow-up.

172 employees

participated in IPT activities in 2024



In 2024, the top three risk areas identified were:

- › Personal protective equipment (PPE) provision;
- › Health and hygiene;
- › Workplace ergonomics.

To enhance engagement of non-OSD employees, the Company decided to train all staff on how to complete and register OHS cards. To further incentivize participation, the most active contributors were rewarded with valuable prizes.

In 2024, employees submitted 34,735 cards (planned value: 30,373), confirming the relevance and success of the initiative.

In 2024, the Company updated its Injury Prevention Team (IPT) Regulations, defining its role and operating procedures aimed at ensuring safe working conditions and achieving zero injuries.

The IPT is an initiative-based group that supports managers of Kazakhtelecom JSC branches in developing and

promoting a safety culture. At the beginning of each year, the IPT Leader, together with the occupational safety and health officer, prepares a Work Plan that is reviewed by Branch General Directors and approved by the Chief Operating Efficiency Officer.

Injury Prevention Teams were established in the cities of Astana, Almaty, Aktau, Aktobe, Atyrau, Kokshetau, Karaganda, Konaev, Kostanay, Kyzylorda, Semey, Taldykorgan, Taraz, Pavlodar, Petropavlovsk, Uralsk, Ust-Kamenogorsk, and Shymkent.

Additionally, in accordance with the Regulations on Encouragement of Employees in the field of Occupational Safety and Health, the Company encourages employees for their contribution to creating safe working conditions and achieving zero injury rates.

In 2024, no internal or external audits were conducted in relation to the HSE system applicable to employees and non-employees workers.

GRI 403-8

EMPLOYEES COVERED BY THE OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Indicator	2022		2023		2024	
	Persons	Share	Persons	Share	Persons	Share
Total headcount of employees	19,979	100%	19,022	100%	18,395	100%
Employees covered by the occupational health and safety management system	19,979	100%	19,022	100%	18,395	100%

GRI 403-8

NON-EMPLOYEE WORKERS COVERED BY THE OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Indicator	2022		2023		2024	
	Persons	Share	Persons	Share	Persons	Share
Total headcount of employees	1,744	100%	518	100%	1,968	100%
Non-employee workers covered by the occupational health and safety management system	1,744	100%	518	100%	1,968	100%

IMPROVEMENT OF THE OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

GRI 403-1

The Company is committed to aligning with international standards in occupational health and safety. Occupational health and safety management systems have been implemented in the Company in accordance with globally recognized standards. The OHS and industrial safety management system establishes uniform requirements based on the ILO-OSH 2001 Guidelines on Occupational Safety and Health Management Systems and the ISO 45001:2018 international standard.

The Company continuously enhances its occupational health and industrial safety management system in line with the requirements of the ILO-OSH standard and its national equivalent, ST RK ISO 45001-2018.

In 2024, in order to improve workplace safety and comfort, certification of 1,428 production facilities was carried out. Based on the results of measurements of harmful and hazardous occupational factors, a comprehensive set of corrective actions was implemented. An internal audit was conducted to assess production safety and compliance of workplaces with occupational health and safety requirements across all structural units of the Company.

1,504

KZT million

total investments in industrial safety and occupational health in 2024

RISK ASSESSMENT

GRI 403-2

The process of managing key OHS risks is an integral part of the Company's corporate risk management system, as well as its occupational health and safety (OHS) management system. The assessment of unacceptable hazards and risks is carried out in accordance with the approved documented procedure "Identification of Hazards, Environmental Aspects and Risk Assessment. Procedure for Defining Control Measures."

To eliminate the risks of accidents and incidents in the workplace, modernization and major repairs of linear and station telecommunication facilities were carried out in accordance with the Annual Plan.

Occupational injuries are defined as one of the key risks in the Company's Risk Register. A set of measures has been developed to prevent the realization of this risk and to mitigate its consequences.

To identify work-related hazards and assess risks, the Company prepares action plans for key risk events and provides up-to-date status reports on key risk indicators based on data on occupational injuries, industrial accidents, and internal OHS controls. The Company has also approved a Register of Significant Hazards and Unacceptable Risks. Furthermore, the likelihood and impact of risks are analyzed and assessed, with risk mitigation measures reviewed in light of the current situation.

In addition, the Company's Collective Agreement provides a mechanism that allows employees to refuse to perform work if they believe that continuing such work could lead to injury or harm to health. The agreement also contains provisions that guarantee protection against retaliation for exercising this right.



GRI 403-2, 403-9

Kazakhtelecom JSC regularly identifies and assesses project-related risks and potential adverse impacts on the health and safety of the population in its areas of presence. Based on the results of these assessments, protective and preventive measures are developed. Where necessary, the Company cooperates with relevant government authorities and other stakeholders regarding mitigation actions and plans.

As part of the hazard identification and risk assessment procedure, the Company takes into account the routine activities of all personnel, human behaviour and capabilities, hazards identified near or outside the work areas, infrastructure, equipment and materials, and technological processes. Risk management activities have been defined and are implemented across the Company.



PREVENTION OF OCCUPATIONAL INJURIES

GRI 403-7

The Company pays great attention to the proactive prevention and mitigation of adverse impacts on the health and safety of employees, contractors, and local communities.

The list of KPIs for heads of the Company’s regional branches in the area of occupational safety includes the Lost Time Injury Frequency (LTIF) rate.

The Company develops and implements measures aimed at preventing occupational injuries.

An analysis of the causes of occupational injuries and road traffic accidents is carried out, followed by the distribution of informational bulletins to branches containing preventive and corrective measures. In addition, the circumstances and causes of incidents are discussed with employees across all departments, and unscheduled safety briefings are conducted.

Each year, the Company implements a Zero Injury Plan, with quarterly progress reports submitted for review by the Board of Directors.

To adopt leading practices, the Company monitors the use of proactive safety tools such as behavioural safety audits, with registration and investigation of hazardous conditions, unsafe actions, and near misses.

The Company has also improved the efficiency of contractor management.

This includes the development of an internal regulatory document governing the management of contractor organisations, as well as the introduction of kick-off meetings with contractors to ensure the safe execution of work at production facilities.

To raise awareness of the importance of seatbelt use and reduce injury rates from road accidents, Kazakhtelecom employees were trained using a collision simulator.

The Company does not maintain statistical records of injuries among contractor personnel engaged under service agreements.

In response to the need to enhance fire safety, comply with the legislation of the Republic of Kazakhstan, and reduce the risk of fire incidents, Kazakhtelecom JSC has adopted a Fire Safety Policy.



Injury rates among employees of Kazakhtelecom JSC

GRI 403-9

INJURY RATES AMONG EMPLOYEES OF KAZAKHTELECOM JSC*

For all employees	2022	2023	2024
Number of work-related fatalities (units)	0	0	0
Work-related fatality rate (%)	0	0	0
Number of severe work-related injuries (units)	2	1	4
Severe work-related injury rate (%)	0.06	0.03	0.12
Number of occupational injuries (units)	2	6	6
Lost Time Injury Frequency Rate (LTIFR)	0.06	0.19	0.19
Total number of working hours (man-hours)	34,007,902	31,780,000	31,308,380

* The reported data covers 100% of the Company’s employees. No categories of workers were excluded from this statistics. The rates were calculated based on 1,000,000 hours worked.

GRI 403-9

OCCUPATIONAL INJURY INDICATORS FOR WORKERS WHO ARE NOT EMPLOYEES OF KAZAKHTELECOM JSC**

For all employees	2022	2023	2024
Number of work-related fatalities (units)	0	0	0
Work-related fatality rate (%)	0	0	0
Number of severe work-related injuries (units)	0	0	0
Severe work-related injury rate (%)	0	0	0
Number of occupational injuries (units)	0	0	0
Lost Time Injury Frequency Rate (LTIFR)	0	0	0
Total number of working hours (man-hours)	2,125,129	601,494	1,091,678

**The reported data covers 100% of the Company’s employees. No categories of workers were excluded from this statistics. The rates were calculated based on 1,000,000 hours worked.

In 2024, the Company recorded 6 Lost Time Incidents (LTIs), which resulted in 6 minor to moderate injuries, as well as 35 near-miss incidents.

The main causes of the injuries were:

- › violation of occupational health and safety regulations;
- › failure to comply with safety requirements during vehicle operation;
- › gross negligence on the part of the injured person;

- › poor organisation of work processes;
- › insufficient training in safe work practices.

As a result of the identified incidents, the management of Kazakhtelecom JSC implemented the following corrective measures:

- › a special investigation was carried out;
- › a full inspection of work equipment was conducted across the Company’s branches and divisions



- to ensure compliance with occupational health and safety (OHS) requirements;
- › refresher training on working at height was provided;
 - › additional audits of height-related work processes were conducted;
 - › information about the incidents (including those in Samruk-Kazyna portfolio companies) was communicated to employees;
 - › safe driving training was delivered to full-time and part-time drivers;
 - › unscheduled safety briefings were conducted for employees;
 - › disciplinary action was taken against the employees found responsible.

In 2024, to improve the safety of employee travel, Kazakhtelecom JSC updated its Standard for Ensuring the Safe Operation of Vehicles. This document establishes uniform requirements for organising road safety measures during the Company’s operational activities. It aims to prevent road traffic accidents and employee injuries, ensure the safe operation of vehicles, strengthen labour discipline, and promote a culture of safe driving among employees.

In July 2024, a fatal incident occurred in the village of Shyraganak, Kegen district, due to improper organisation of cable laying works, resulting in the death of a child. The Company acknowledged the incident, expressed its willingness to cooperate with the investigation, and provided support to the victim’s family.

EMPLOYEE TRAINING AND THE DEVELOPMENT OF A SAFETY CULTURE

GRI 403-5

The Company implements advanced international practices in the field of occupational health and safety (OHS), including training and professional development.

Each year, Kazakhtelecom JSC provides training for employees on occupational and industrial safety, fire safety basics, and electrical safety when working with electrical installations. This training is delivered both through external training organisations and directly at workplaces.

In 2024, various occupational health and industrial safety training sessions and programmes were conducted for employees of Kazakhtelecom JSC.

The Company also provides training for employees under the “Safety Culture” course. In 2024, a total of 9,577 production personnel completed this training.

In 2024, the Corporate University conducted training sessions and educational programmes on occupational health and industrial safety for the Company’s employees.

- › Safe driving – 2,101 participants
- › Safety culture – 9,853 participants
- › Safe Work Environment (SWE 2) – 1,717 participants
- › Injury Prevention and Response (IPR 2) – 4,092 participants
- › HSE Facilitator – 13 participants.

Total coverage: 17,776 participants.

EXTERNAL TRAINING ON OCCUPATIONAL AND INDUSTRIAL SAFETY, FIRE SAFETY BASICS, AND WORKPLACE SAFETY CONDUCTED IN 2024

0

trained under the course on management accountability for top executives

1,249

trained under the course on occupational health and safety

2,560

trained under the course on industrial safety requirements

908

trained under the course on safety rules at hazardous production facilities (HPFs) for working at height and rope access work

971

trained under the course on electrical safety

1,474

trained under the course on fire safety

1

trained under the NEBOSH IGC course (International General Certificate in Occupational Health and Safety)

In 2024, a strategic session was held with CEO-1 level executives and branch general directors on the topic “Creating a Safety Culture and Zero Tolerance for Workplace Fatalities,” as well as a modular programme titled “Leadership in Industrial Safety.” In partnership with the Private Institution Samruk Business Academy, master classes were delivered on the assessment and analysis of industrial safety processes, and a comprehensive evaluation of the current level of safety culture was carried out in line with international best practices.

3

trained under the IOSH Managing Safely course

In 2024, four employees of the Department for Occupational Safety completed training under international programmes NEBOSH and IOSH, reflecting the Company’s commitment to aligning with international occupational health and safety standards. A total of 543 managers of Kazakhtelecom JSC took part in the safety culture survey.



The Company operates a video-based training programme for responsible managers on occupational health and industrial safety (OHS) matters. As part of the programme, employees are shown video materials on the following topics:

- › performing high-risk work in areas near power lines and using special equipment;
- › methods and techniques that ensure employee safety;
- › providing first aid in the event of workplace accidents.

This video training programme is implemented across all structural units and divisions of the Company, with continuous monitoring, analysis, and decision-making aimed at improving its effectiveness. This training format helps enhance employee performance in the course of operational activities and minimise existing workplace risks.

PREVENTION OF OCCUPATIONAL DISEASES AND HEALTH PROTECTION

GRI 403-3, 403-6

As employee well-being is a key priority for Kazakhtelecom JSC, special attention is paid to their health.

As part of the employee benefits package, full medical insurance is provided. Employees also have access to wellness and sanatorium-resort treatment

programmes in accordance with the terms of the Collective Agreement, as well as the Demeu programme.

Regular pre-employment, periodic, and unscheduled medical examinations are conducted for employees. Based on the results, if necessary, employees are referred for in-depth preventive check-ups. Production personnel required to undergo mandatory medical exams are not permitted to begin work if the examination is not completed.

In accordance with the Labor Code of the Republic of Kazakhstan, employees of contracting organizations engaged in high-risk work or operating machinery and equipment are also subject to mandatory pre- and post-shift medical screenings.

As part of the Company's corporate Well-Being program, a number of health-related activities are conducted to prevent illnesses. To assess cardiovascular risk among employees, screenings are carried out using the Cardiovisor device. Based on the results, employees receive consultations with physicians and personalized recommendations. Wellness assessments are also conducted using the Mediscreen device to identify musculoskeletal health issues, with medical guidance provided accordingly.

In addition to these core initiatives, employees of Kazakhtelecom JSC participated in a webinar titled "How to Boost Your Energy and Strengthen Immunity." The Company also organized Health Days and physical activities aimed at supporting and improving employees' physical condition.

OCCUPATIONAL HEALTH AND INDUSTRIAL SAFETY MANAGEMENT IN CONTRACTING ORGANIZATIONS

GRI 403-3, 403-6

Contracting organizations performing work at the Company's sites are required to comply with applicable environmental protection and occupational safety standards and regulations.

Kazakhtelecom JSC places great importance on engaging with suppliers of goods, works, and services in the context of managing occupational health and safety (OHS) aspects. Contractors and suppliers are expected to meet the Company's internal safety requirements, in line with corporate industrial safety standards. At the same time, contracting organizations are responsible for independently monitoring compliance with these OHS requirements.

The Company has implemented a system for assessing contractors' performance in occupational safety. It also provides OHS training for employees of contracting organizations.

Plans for 2025 and the medium term

People: Enhancing the Safety Culture:

- › Increase the qualification level of managers and employees. Organize thematic safety meetings led by managers at all levels.
- › Report to the Company's Board of Directors on fatal accident investigations, root causes, and actions taken to prevent recurrence.



- › Conduct a survey among senior managers to assess the current safety culture. Develop an action plan to improve safety culture for those with low scores.

Equipment Safety:

- › Continue modernization and technical upgrades of equipment to improve safety.
- › Conduct cross-audits in the Fund's portfolio companies according to the audit schedule.
- › Continue monitoring the use of proactive safety tools (behavior-based safety audits/observations, reporting and investigating unsafe conditions, unsafe acts, and near misses, including stop-work authority), and develop actions to improve these practices.
- › Strengthen engagement with contractors to ensure safe execution of work at the Company's production facilities.

Emergency Prevention and Preparedness:

- › Ensure training activities are carried out, including drills and/or emergency response exercises for major accidents or emergencies at facilities, involving the Fund and government agencies; conduct fire drills in administrative buildings (offices) and at locations housing shift workers.

OHS Awareness and Communication:

- › Organize Occupational Safety Sessions/Forums for CEOs of subsidiaries and regional branches.
- › Release a video message from the Chairman of the Management Board summarizing the year's results in the area of occupational safety.
- › Involve young professionals in occupational safety by supporting youth project initiatives through the Young Workers' Center for Occupational Safety.