



Eurasian Group Limited Liability Partnership

**APPROVED**  
by General Director  
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# **BIODIVERSITY**

## **POLICY**



Eurasian Group LLP

## Foreword

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## Contents

1.	Document purpose .....	4
2.	Terms, definitions and abbreviations.....	4
2.1	Terms and definitions .....	4
2.2	Designations and abbreviations .....	5
3.	Requirements .....	5
3.1	General .....	5
3.2	Principles of Biodiversity Conservation .....	5
3.3	Obligations .....	6
4.	Responsibility .....	7

## 1. Document purpose

This Biodiversity Policy (hereinafter referred to as the Policy) establishes the basic principles and obligations of the Group Company in biodiversity conservation. The policy has been developed in accordance with the applicable legislation of the Republic of Kazakhstan and internal documents of the Group Company. This Policy applies to all Divisions and Assets of the Group, employees, business operations, regardless of the jurisdictions in which the Group conducts commercial and other activities.

The requirements of this Policy apply to all services provided by the Group Companies, all business processes, including production, commercial and administrative activities. For all matters not specified in the Policy, persons shall follow relevant internal regulatory documents of the Group Company and the applicable regulatory acts of the Republic of Kazakhstan.

## 2. Terms, definitions and abbreviations

### 2.1 Terms and definitions

The following terms with corresponding definitions are used in this Policy:

**Group Companies** is ERG or any of its direct and indirect subsidiaries controlled by ERG.

**ERG (ERG Group)** is a set of legal entities in relation to which the company Eurasian Resources Group S.a.r.l. exercises control over shares/interests directly or indirectly.

**Division** is a subdivision that is a part of the structure of the Headquarters and consolidates for management purposes Assets based on the product being manufactured (Chrome, Iron, Coal, Energy, Aluminum).

**An asset (of a division)** is a structural unit managed by a Division or a functional vertical.

**Headquarters** is Eurasian Group LLP.

**Stakeholders** are a person, group of individuals or individual organizations whose actions, behavior or decisions may influence the Group Companies. Examples of stakeholders are employees of the Group Company, clients, partners, contractors, government bodies, non-profit organizations, local communities in the regions of the Group Company presence.

**Biodiversity** is the variability of living organisms from all sources, including, but not limited to, terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species and ecosystems. In this guide, we define biodiversity as the species, habitats and ecosystems (including the services they provide) that occur within the company's area of influence.

**Stakeholders** are direct and indirect shareholders of the Company, Enterprises, ERG Group, employees of the Company and Enterprises, citizens of the Republic of Kazakhstan, whose well-being and prosperity depend on the activities of the Company and Enterprises.

**Terms of Reference (ToR)** is a legal document that is an appendix to the agreement between the customer and the contractor for design work and is its basis. It determines the procedure and conditions of work, including goal, objectives, principles, expected results and deadlines.

## 2.2 Designations and abbreviations

The following abbreviations are used in this Policy:

**IRD** - internal regulatory document;

**ESG** - environmental, social and governance (environmental, social, governance)

**HQ** - Headquarters.

## 3. Requirements

### 3.1 General

This Policy is a document defining the basic principles, goals and objectives in the field of biodiversity conservation and expresses the official position of the Group Company regarding its role and obligations in ensuring a favorable environment in the regions of its presence.

The policy is aimed at preventing and minimizing the negative impact of the Company's activities on biodiversity.

### 3.2 Basic Principles of Biodiversity Conservation

- 3.2.1 Integrate the conservation of biodiversity and natural wealth into the Group's strategy, at the stages of tendering, implementation and operation of projects.
- 3.2.2 Conserve and rationally use biological diversity and natural resources.
- 3.2.3 Protect species and habitats, both threatened and of high biodiversity value, by taking measures to prevent, minimize and improve the status of biological diversity within the Boundaries of the activities of the Company's Divisional Assets.
- 3.2.4 Promote compensation for the impact of activities on biodiversity and, in particular, on habitats and protected species, if such impacts exist.
- 3.2.5 Training employees and specialists in methods of responsible work in the field of biodiversity.
- 3.2.6 Promote knowledge and awareness of biodiversity by collaborating with local communities, restoration centers, research centers, administration and other parties concerned to conserve and protect biodiversity.

## Obligations

- 3.2.7 Strive to achieve the goal of preventing the loss of biological diversity and identify mechanisms for achieving it, as well as develop measures to reduce the impact on biodiversity.
- 3.2.8 Disclose information to interested stakeholders about the qualitative/quantitative goals of the Group Company for the conservation of biodiversity and plans for their implementation;
- 3.2.9 Periodically assess the impact on biodiversity within the boundaries of the activities of the Assets (divisions). Based on the results of the condition assessment for areas with a significant level of impact on biodiversity, the Divisions develop plans for biodiversity management;
- 3.2.10 Disclose information to interested stakeholders on assessing the impacts and risks associated with biological diversity;
- 3.2.11 Conduct an assessment and analysis of the risks of impact on biodiversity at the boundaries of the activities of the Group's assets;
- 3.2.12 Generate and disclose information to interested stakeholders about mining projects, indicating the type of project (projects), location and mining methods used, and the area of disturbed land for each project;
- 3.2.13 Generate and disclose reporting to interested stakeholders on restored sites (total/reporting year) for mining projects, including issues of land use after the end of mining;
- 3.2.14 Inform interested stakeholders of the location of mining projects in or near legally protected and internationally recognized areas;
- 3.2.15 Do not undertake new exploration or development within World Heritage sites, respect protected areas designated by law, and design and implement any new operations or changes to existing operations in a manner that is compatible with the value for which such areas were designated.
- 3.2.16 Assess and address risks and impacts to biodiversity and ecosystem services by implementing a hierarchy of mitigation, aiming to achieve no net loss of biodiversity.
- 3.2.17 Disclose information about the potential reduction of significant impacts on biological diversity as a result of environmental restoration;
- 3.2.18 Inform interested stakeholders about significant negative impacts on biological diversity caused by major investment projects of the Group Company;
- 3.2.19 Collaborate with non-governmental organizations to promote the implementation of biological diversity goals and commitments.
- 3.2.20 Participate in industry initiatives and (or) initiatives to develop standards that promote sustainable development in the mining industry;
- 3.2.21 Inform interested stakeholders about partnerships with public organizations in order to facilitate the implementation of the Group Company's goals and obligations related to biological diversity.
- 3.2.22 Take into account the requirements in the Terms of Reference and during design.
- 3.2.23 Support and participate in the implementation of projects to conserve biological diversity in the regions of presence of the Group's assets with local stakeholders.



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#### **4. Responsibility**

For violation of the requirements of this Policy, employees of the Group Company, involved in the process of compliance with standards and requirements in the field of biodiversity conservation, bear disciplinary responsibility in the manner established by applicable law and internal documents of the Group Company.

Environmental protection departments of the Group Company are responsible for monitoring the implementation of this Policy.

