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ENVIRONMENTAL POLICY

WD-PLC-07

**Atyrau
2026**

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1. GENERAL PROVISIONS

- 1.1. Environmental protection, including climate change and the sustainable use of natural resources, is considered by West Dala LLP as a strategic direction of its activities. West Dala LLP understands its responsibility to reduce the negative impact on the environment in all main and auxiliary processes of waste, wastewater and secondary raw materials management.
- 1.2. The main goal of West Dala LLP in the field of environment is to increase the level of environmental safety and consistent reduction of the negative impact of technological processes on the environment and climate, as well as related risks, taking into account technical capabilities, socio-economic factors.
- 1.3. The Environmental Policy of West Dala LLP (hereinafter referred to as the Policy) details the priorities and principles in the field of environmental and climate protection, as well as the directions of implementation of strategic initiatives of West Dala LLP in the field of environmental protection.
- 1.4. The Policy is developed in accordance with the current legislation of the Republic of Kazakhstan in the field of environmental protection, in accordance with the requirements of ISO 14001 and taking into account international environmental practices.
- 1.5. West Dala LLP confirms its commitment to the principles of sustainable development, including contributing to the achievement of the United Nations Sustainable Development Goals (UN SDGs), implementing environmental, social and governance (ESG) principles, and advancing the circular economy through the efficient use of resources, waste prevention, reuse, recycling, and the return of materials into secondary circulation.
- 1.6. The Policy is intended for mandatory application by all employees of West Dala LLP regardless of their position and all structural divisions of West Dala LLP, as well as all Contractors and Subcontractors of West Dala LLP.
- 1.7. This Policy shall be maintained up to date as documented information and posted on the Company's website and in the IMS network folder.
- 1.8. Employees of West Dala LLP shall acknowledge this Policy by signing the Acknowledgement Sheet. Upon revision of the Policy, employees shall acknowledge it again.

2. KEY PRIORITIES AND PRINCIPLES FOR ENVIRONMENTAL PROTECTION AND MITIGATION OF CLIMATE IMPACTS

- 2.1. When making decisions on environmental protection and climate change mitigation at all levels of the corporate governance, the management and employees of West Dala LLP are guided by the following principles:

1) Compliance with requirements and standards:

- To fulfill the requirements of the current legislation of the Republic of Kazakhstan on environmental protection and mitigation of climate impacts, as well as other accepted commitments of external stakeholders, including the requirements of the Clients and ISO 14001.
- To monitor the emergence of international best practices in environmental protection and climate mitigation, and to ensure compliance with them where practicable and economically feasible.
- To take into account the current and planned new regulatory and legal requirements in the field of environmental protection, environmental safety, environmental management and climate change, when making managerial decisions.

2) Effective risk management:

- To conduct identification and regular updates of environmental risks and identify and analyze all risks arising from accidents, emergencies and incidents. To apply risk-oriented approach in the field of ecology by all employees of West Dala LLP, regardless of their position;
- To be guided by the results of environmental risk assessment when making operational and strategic decisions related to the activities of West Dala LLP and its assets, planning and taking measures to eliminate or minimize their negative impact on the environment and climate.
- To improve the risk management system to prevent negative environmental and climate impacts before such impacts occur.
- To implement preventive actions to avoid negative environmental and climate impacts within the framework of prioritizing preventive measures to avoid negative impacts over measures to eliminate the consequences of such impacts.

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3) Consistent improvements:

- To continuously monitor West Dala LLP's environmental and climate mitigation performance and operations.
- To improve the efficiency and effectiveness of environmental and climate mitigation practices.
- To improve production processes, focusing on resource-saving and environmentally friendly technologies. To apply the best available technologies, develop and apply new best practices, approaches and processes for environmental protection and climate mitigation wherever practicable and economically feasible.
- To conduct studies, to identify and apply leading science and innovative technical solutions in reducing the environmental and climate impacts of West Dala LLP's activities and operations.

4) Involvement of employees and structural divisions:

- Define and assign the responsibilities of employees and structural units of West Dala LLP for actions related to environmental protection and environmental safety within the scope of their job descriptions and the Company's internal procedures.
- To educate and involve West Dala LLP employees in environmental protection, environmental safety, environmental management and climate impact mitigation activities, taking into account the degree of potential impact of their decisions and actions on the environment and climate. To improve professional and environmental education of employees, that will allow preventing and avoiding negative environmental impacts.

5) Engagement and openness:

- To collaborate and ensure mutual understanding with West Dala LLP stakeholders, including local communities and community organizations, on West Dala LLP's environmental and climate mitigation initiatives and general activities. To engage in an open dialog with all stakeholders.
- To disclose on a regular basis key information on West Dala LLP's activities in the field of environmental protection and climate change mitigation to West Dala LLP stakeholders, in accordance with the regulatory and legal requirements of the Republic of Kazakhstan, West Dala LLP's voluntary commitments and the requirements of international reporting standards.
- To participate in environmental and climate mitigation initiatives, business councils and environmental and climate mitigation organizations.

6) Expert support:

- To engage representatives of the scientific and expert community in the process of preparing information and justifications for decision-making in the field of environmental protection and climate change.
- To take managerial decisions on the basis of comprehensive analysis and consideration of modern approaches and advanced technical solutions to minimize the negative impact of West Dala LLP operational activities on the environment.

3. AREAS OF POLICY IMPLEMENTATION

3.1. In order to ensure environmental protection and prevent climate change, West Dala LLP will seek to implement a number of short and long-term programs and initiatives that address the following objectives:

- Consistent improvement of the Environmental Management System of West Dala LLP based on the requirements of ISO 14001 international standard.
- Minimization of pollutant emissions into the atmosphere.
- Control of negative climate impacts through assessment and monitoring of direct and indirect greenhouse gas emissions.
- Improvement of energy efficiency of production processes and operations of West Dala LLP.
- Ensuring trouble-free functioning and operation of all equipment to minimize environmental pollution risks.
- Minimization of water consumption and reuse of treated wastewater for own needs, reduction of treated wastewater discharges.

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- Restoration of disturbed lands taking into account technical capabilities, economic factors and timing of land reclamation works according to the project documentation.
- Minimization of negative impact on biodiversity and promotion of its conservation in the regions where West Dala LLP's production facilities are located.
- Increasing the level of knowledge and awareness of employees in the field of environmental protection and climate change.

3.2. The main methods of waste management include the following actions:

- Application of the principle of hierarchy of measures for waste prevention and management of generated waste.
- Increasing the share of waste recycling and reuse and its safe disposal, accumulation and utilization.
- Prevention of excessive accumulation of hazardous and non-hazardous waste at the facilities of West Dala LLP.
- Timely disposal of hazardous waste.
- Sorting waste and increasing the recovery rate of usable recyclables prior to landfilling.
- Application of modern technologies and integrated recycling methods to engage waste in circular economy processes.
- Disposal of waste, that cannot be used, at specialized facilities that meet modern requirements.

3.3. Based on the international principle of zero gross deforestation, West Dala LLP does not allow cutting or any other destruction of primary and protected forests in the course of its own operations and business activities, including processes related to waste management. West Dala LLP recommends that its suppliers and other contractors monitor and mitigate deforestation risks while conducting business.

4. COMPLIANCE WITH THE POLICY

4.1. All employees of West Dala LLP shall follow the priorities and principles established in the Policy and comply with the environmental legislation of the Republic of Kazakhstan.

4.2. Violation of the policy may result in disciplinary measures against the employee in accordance with the legislation of the Republic of Kazakhstan and the internal policies and procedures of West Dala LLP.

5. FINAL PROVISIONS

5.1. The Policy, as well as all annexes, supplements and amendments thereto, are approved by the General Director of West Dala LLP.

5.2. The Policy comes into effect from the date of approval by the General Director of West Dala LLP unless the General Director of West Dala LLP decides otherwise.

5.3. The Policy is reviewed as necessary, but at least once every three (3) years, to ensure it is up-to-date and consistent with applicable standards and practices.

5.4. Amendments and additions to the Policy come into force from the date of their approval by the General Director of West Dala LLP unless the General Director of West Dala LLP decides otherwise.

5.5. If, as a result of changes in the regulatory legal acts of the Republic of Kazakhstan, certain provisions of the Policy come into conflict with them, the current legislation of the Republic of Kazakhstan applies until the Policy is amended.

5.6. In case there are discrepancies between the Policy and the laws of the Republic of Kazakhstan or other applicable standards, the stricter requirements apply.

6. REVISION RECORD SHEET

Revision	Date of revision	Description of changes made	Title/Full name of the person that made the change
1	20.09.2023	Initial version, due to ESG implementation.	Head of Ecology Department Naurzbaeva A. K.

