IE 'Ecoexpertservice'.
г. Kostanay, North-West microdistrict, sq. 48A, 4
certificate of state registration series 3917 #0004141 from 17.04.2014.
Phone: 8-777-330-7476

CONCLUSION dated 23 July 2024

on the «Report of the proactive environmental audit»

conducted for Kazakhtelecom JSC for 2021-2023.

Initiative Environmental Audit for Kazakhtelecom JSC was conducted on the basis of the contract No. 950273/2024/1 dated 15.02.2024 between Kazakhtelecom JSC and IE 'Ecoexpertservice'.

The report on the conducted initiative environmental audit was made by the Environmental Auditor A.D. Mikhailichenko (State Licence 02456R dated 28.11.2018).

To carry out the environmental audit in Kazakhtelecom JSC, its Branches and subdivisions, an Audit Team was established consisting of expert auditors and specialists of the Department of Corporate Governance and Sustainable Development accompanying the Auditor on regional subdivisions of Kazakhtelecom JSC's Branches.

In the course of the environmental Audit, the Central Office in Astana, the Branches of Kazakhtelecom JSC in Almaty and regional subdivisions of the Branches of Kazakhtelecom JSC were visited according to the approved plan of the schedule of visits to the facilities of Kazakhtelecom JSC.

1.General information.

Subdivisions of the Branches of Kazakhtelecom JSC are represented by oblast and city telecommunication networks of the Company located in 237 settlements, of which:

- 17 cities of republican significance,

- 24 small towns,

- 159 district centres,

- 54 settlements with a dedicated zone code (former district centres).

The main offices are located in Astana, 12 Saurana str. (Central Administration (hereinafter referred to as CA) and Almaty (Branches of Kazakhtelecom JSC), regional subdivisions are located in 17 regions of the Republic of Kazakhstan.

Branches of Kazakhtelecom JSC:

- Business-to-Business Division (hereinafter referred to as BBD)
- Business-to-Customer Division (hereinafter referred to as BCD)
- «Network» Division Association (hereinafter referred to as NDA)
- Information Technologies Division (hereinafter referred to as ITD)
- Project Management Directorate (hereinafter referred to as PMD)
- Telecom Supply Directorate (hereinafter referred to as TSD)
- Service Factory (hereinafter referred to as SF)
- Info communications Academy Directorate (hereinafter referred to as the Corporate University).

2. Brief 2haracterization of the Audited entity.

The main production activity of the regional subdivisions of Kazakhtelecom JSC is construction, operation, repair and maintenance of telecommunications networks and auxiliary technological equipment designed to ensure continuous and trouble-free access to Internet resources and telecommunications systems.

Based on the data provided by the affiliated branches of the SF of Kazakhtelecom JSC, 809 real estate objects located in the oblasts of the Republic of Kazakhstan are on the balance sheet of the affiliated branches:

- 65% or 526 objects are connected to the centralized heating system;

- 3.5% or 28 objects have an autonomous heating point on electricity;

- 5% or 40 facilities have autonomous heating sources on solid fuel, which are sources of pollutants emission into the atmosphere;

13,2% or 107 objects have autonomous heating sources on liquid fuel, which are sources of pollutants emission into the atmosphere;

13.4% or 108 facilities have an autonomous source of heating on gas fuel, which are sources of pollutants emission into the atmosphere.

The main part of administrative buildings and technological premises, including container-type premises, are equipped with emergency power supply sources diesel-generators (hereinafter referred to as DGA) operating on diesel fuel and petrol, which are sources of pollutant emissions, fuel and petrol, which are sources of pollutant emissions into the atmosphere.

In order to maintain the temperature regime in the data center premises and avoid overheating of the equipment, split climate control systems using Freons were installed in the Hermozones and ATCs. Specialists of the regional divisions of the Central Electricity and Telecommunication Centre control the temperature regime in the premises where telecommunication equipment is installed, also perform refilling of air conditioning systems with Freon and carry out minor repairs to exclude emergency situations related to overheating of equipment.

Kazakhtelecom JSC has motor transport and special equipment on the balance sheet of the NDA Branches and Service Factory. Motor transport and special equipment on the balance sheet of the NDA is used for technological needs of Technical Hub of Backbone Communications and Television Network subdivisions. The Service Factory renders motor transport services to regional subdivisions of Kazakhtelecom JSC. According to the provided data, there are 2,197 vehicles on the balance sheet of the Branch of Kazakhtelecom JSC. Storage of motor vehicles is provided for at the production sites with garage boxes and open storage places. Works on maintenance and repair of motor vehicles are carried out by third-party organizations according to the agreement on rendering services. Refueling of vehicles is carried out

centrally through the network of petrol stations.

3. Characteristics of technological processes that have a negative impact on the environment.

According to the analysis carried out on the list of used equipment, technology of work and volumes of used consumables in Kazakhtelecom JSC's subdivisions, it was established that the main environmental impact of Kazakhtelecom JSC's subdivisions is mainly in winter period due to the use of autonomous heating systems operating on gas, liquid and solid fuel. Maximum emission of pollutants into the atmospheric air occurs in the winter period.

According to the data provided by the Center for Energy and Climate Technology of the NDA of the Branch of Kazakhtelecom JSC, the total number of DGAs is 1212 units, petrol generators 1314 units. Stationary DGA`s are installed on the territory of ADMINISTRATIVE AND UTILITY COMPLEX in containers or ‘Generator room’ buildings. According to the approved regulations, scheduled switching on of DGA`s once a week for 20 minutes and once a month for 1 hour and in case of emergency power outages is

envisaged in order to ensure uninterrupted operation of technological equipment. The time of operation of DGA`s is recorded in the equipment operation log by the person in charge. For uninterrupted operation, stationary DGA`s are equipped with a fuel storage tank. For stationary DGA`s with a capacity of more than 500 KW installed at data centers, buried tanks with a daily supply of diesel fuel are provided.

The auditor was provided with the following data on the turnover of materials B subdivisions of Kazakhtelecom JSC's Branches, the use of which has a negative impact on the environment by emitting pollutants into the atmosphere and generating hazardous waste requiring timely disposal.

Information on boiler equipment for heat supply of buildings in the subdivisions of Kazakhtelecom JSC.

One of the types of economic activities in the subdivisions of Kazakhtelecom JSC, for which there is a need to have a Permit for operation and maintenance of air conditioning systems, is the use of ozone-depleting substances. In order to maintain the temperature regime in the premises and exclude overheating of the equipment, split climate control systems are installed at the Data Center and ATCs, which use freons. Based on the presented data, there are 3,685 units of air conditioners on the balance sheet of the DDS CE&C, including split systems, industrial and household air conditioners, which are serviced, refuelled and maintained in the regions by the specialists of DESD. To maintain air-conditioning equipment in working condition. During the year, the Branch of Kazakhtelecom JSC NDA centrally procures freons of R-22 (difluorochloromethane), R-410A, R-407 brands for regional divisions of DESD and TECHNICAL HUB OF BACKBONE COMMUNICATIONS AND TELEVISION NETWORK.

The specialists of DESD control the temperature regime in the premises where the telecommunication equipment is installed, as well as refill the air conditioning systems with Freon and perform minor repairs in order to exclude emergency situations related to overheating of the equipment.

4. Environmental protection. In the course of the Audit it was established that JSC Kazakhtelecom (hereinafter referred to as the Company) has the following activities:

'Kazakhtelecom JSC (hereinafter referred to as the Company) has established the Department of Corporate Governance and Sustainable Development (hereinafter referred to as the Department of Corporate Governance and Sustainable Development). The Department is a structural subdivision of Kazakhtelecom JSC's Central Administration Office (hereinafter referred to as CA). Within the Corporate Governance and Sustainable Development Department, there is a position of 'environmental manager', which is occupied by a specialist with higher environmental education. A job description was developed and approved for the manager-ecologist of the service, whose duties include maintaining internal document flow regulating the activity of the structural subdivision.

In the branch office of Kazakhtelecom JSC, responsible specialists were appointed in regional subdivisions for primary collection of data on generated waste, its temporary placement and storage in warehouses, and transfer for disposal under the agreement between Kazakhtelecom JSC and a third-party organization.

In order to implement the environmental policy, reduce the negative impact on the environment, as well as to create an environmentally comfortable environment, Kazakhtelecom JSC is introducing the 'Green Office' programme for employees of its subdivisions.

The aim of the programme is to reduce the negative impact of offices on the environment by optimizing and greening processes, promoting the rational use of resources, creating a favourable environment for employees and changing employees' attitudes towards environmental protection.

In accordance with paragraph 11 of Article 418 of the Environmental Code of the Republic of Kazakhstan No. 400-VI dated 02.01.2021 and within the framework of adoption of and compliance with the Environmental Policy (Minutes of the Meeting of the Board of Directors dated 10.09.2019 No. 16) and the ESG Principles of Kazakhtelecom JSC, the "Environmental Action Plan for 2022-2023" approved by Order of the Chairman of the Board of Directors of Kazakhtelecom JSC dated 12.05.2022 No. 98 has been developed. The Action Plan is a set of technological, technical, organisational, social and economic measures aimed at protecting and improving the quality of the environment.

In the course of the audit, the company analysed the implementation of environmental protection measures planned by Kazakhtelecom JSC for 2022-2023.

The audit was based on the materials submitted to the auditor for review:

Plan of environmental protection measures for 2022-2023 (approved by Order of the Chairman of the Board of Directors of Kazakhtelecom JSC No. 98 dated 12 May 2022);

Information on the implementation of environmental protection measures for 2022-2023 (approved by Order of the Chairman of the Board of Directors of Kazakhtelecom JSC No. 98 dated 12 May 2022).

Table 4. Degree of compliance with environmental protection measures

Having familiarized with the training programs taught at the Corporate University of Kazakhtelecom JSC, the Auditor found that the HSE&ESG Academy program is mainly focused on occupational safety and health, the principles of environmental protection and ecological safety are not disclosed in this program. In this regard, it is recommended to develop a programme to improve the level of environmental literacy in the field of environmental safety in the field of production waste management and work with ozone-depleting substances, as well as ESG principles.

5. Unit Categorisation.

During the environmental audit, the Auditor was provided with:

- permits for emissions into the environment for the subdivisions of Kazakhtelecom JSC's Branches;
- decisions on determining the category of the object having a negative impact on the environment, executed in 2021-2023.

On the basis of item 10 of Article 418 «Validity of permits for emissions into the environment, emission standards obtained by operators of facilities classified by B

in accordance with paragraph 3 of this Article to:

IIII category facilities, shall be terminated from the date of submission of the declaration of environmental impact in accordance with this Code;

Category IV facilities shall be terminated from 1 July 2021».

According to the submitted data, as of the beginning of 2021, Kazakhtelecom JSC's subdivisions included 782 production sites, 754 of which belonged to the IV category, 26 sites belonged to the III category and 2 sites of the II category in accordance with the requirements of the Environmental Code of the Republic of Kazakhstan dated 9 January 2007 No. 212-III. The enterprise regularly and in time executed normative documents according to the Ecological Code of RK in accordance with article 25 of the Ecological Code of RK.

In connection with the new Environmental Code of the Republic of Kazakhstan dated 2 January 2021. No. 400-VI there were changes in the definition of categories of the object. Category B of ZRC of production sites of Kazakhtelecom JSC's subdivisions is determined in accordance with the provisions of this Code. In this connection, as of the beginning of 2021, the subdivisions of Kazakhtelecom JSC included 782 production sites, including

746 objects of IV category, 29 objects of III category and 9 objects of III category. In accordance with the ECRC requirements, the hazard categories of facilities are established on the basis of decisions on determining the category of facilities with negative environmental impact issued by the territorial Ecology Departments of the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the Republic of Kazakhstan.

Decisions on determining the objects of II category of Kazakhtelecom JSC's subdivisions in Zhambyl oblast were made in accordance with paragraphs 17 and 18 of Section 2, Annex 2, Section 2 of the Environmental Code of the Republic of Kazakhstan. This was due to the fact that on the territory of the sites there were yard septic tanks, and pumping of domestic sewage from them was carried out without a contract with public utilities. As a result, MPD norms were established for the production sites to determine the volume of pollutants to be disposed of in the environment. In 2022, the Service Factory concluded contracts for servicing the sites by the centralized network sewerage system of public utilities of Zhambyl region. Confirmation was received from district akimats that septic tanks at the facilities of Kazakhtelecom JSC are watertight and are designed for collection of household sewage, which is then taken to the utility company for further discharge into the centralized network of sewage disposal.

As of the end of 2023, the subdivisions of Kazakhtelecom JSC included 782 production sites, 753 of which belong to the IV category, 29 production sites belong to the III category in accordance with Annex 2 to the Environmental Code of the Republic of Kazakhstan dated 2023.

Environmental Code of the Republic of Kazakhstan No. 400-VI 3PK dated 2 January 2021.

The Kazakhtelecom JSC sites belonging to the IIII category are mainly equipped with 250-500 KW diesel generators or coal fired boilers.

The category for industrial sites of Kazakhtelecom JSC's subdivisions is determined on the basis of the ‘Decision on determination of the category of the object having negative impact on the environment’ issued by the authorized body of the object having negative impact on the environment’ issued by the authorized body. According to the materials provided to the Auditor as of the end of 2023.

Table 5 Information on production sites of III category of Kazakhtelecom JSC and declared volumes of emissions and waste on the basis of submitted Environmental Impact Statements for the period of 2021-2023.

#	Location adress	Name of division	Date of submission No. of declaration / No. of authorisation	Volume of declared emissions, tonnes/year	Volume of declared waste volumes, hazardous/non-hazardous
	Zhangeldina, 37	Industrial area	NO. KZ86UKR00007103		0/0
			22.12.2022 № KZ47UKR00017990	29,663	0/0
10	Borodulikha district Borodulikha village. Borodulikha ul. Tauelsizdik 56	Borodulikhinsky KNE Site #1 - Administrative building	22.12.2021 KZ48UKR00007108	27,078	0/0
			24.12.2022, KZ67UKR00018115	27,078	0/0
11	Borodulikha district Borodulikha village. Krupskaya str. 36	Borodulikhinsky KNE Site #1	22.12.2021 KZ75UKR00007107	10,250	0/0
			24.12.2022 KZ40UKR00018116	10,250	0/0
12	East Kazakhstan Region г. Ust-Kamenogors ul. Shakarima, 146	Head office in Ust-Komenogorsk Site No. 6 (AT-22)	21.12.2021г. KZ08UKR00007052	22,936	0/0
			22.12.2022 # KZ09UKR00017995	22,936	0/0
Karaganda region					
13	Karaganda region, c. Osakarova street. Karaganda 89	Association 'Dalnyaya Svyaz', KZ LTC-24	21.12.2021г. KZ90UKR00007031		
			25.12.2022 KZ44UKR00018141		
14	Karaganda region. Karaganda Zachitnaya 36/1	LTC-24 Karaganda	Resolution KZ88VDD00136534 dated 01.06.2020.		
			25.12.2022 # KZ71UKR00018140		
15	Karaganda region, Karkaralinsk city, Aubakirov str. 141	KZLTC-24 Karkaralinsk	21.12.2021г. NO. KZ53UKR00006921		
			25.12.2022 No. KZ01UKR00018139		
16	Karaganda region, Karaganda city, 4 Boulvard Mira, Karaganda city.	Karaganda TUMS of the Central RDT	21.12.2021г. NO. KZ46UKR00007047		
			25.12.2022 N# KZ46UKR00018142		

Akmola region					
17	Kokshetau city, Abay str. 108	Data Centre Kokshetau	21.12.2021 KZ66UKR00006784		
			25.12.2022 KZ07UKR00018128		
Kostanay region					
18	Kostanay region Kostanay city Abilsay street, 20	Data Centre Kostanay	21.12.2021 KZ02UKR00006772	22,329	0/0
			25.12.2022 KZ34UKR00018127	22,329	0/0
North-Kazakhstan region					
19	Petropavlovsk, str. Musrepova 44	Petropavlovsk COD	Resolution No. KZ31VDD00149394 dated 26 August 2020.	22,329	0/0
			17.01.2023 No. KZ12UKR00019202	22,329	0/0
Pavlodar region					
20	Pavlodar region, Bayanaul district, Bayanaul village,	portable container	21.12.2021 KZ82UKR00006884	11,15	0/0
			27.12.2022, No. KZ37UKR00018267	11,15	0/0
21	Ekibastuz, M. Zhunusov street, 42	Atc-34 Ekibastuz city	21.12.2021 KZ07UKR00006876	16,672	0/0
			25.12.2022 No. KZ12UKR00018135	16,672	0/0
22	Terenkul district, village. Terenkol, Baitursynova str. 99	ATC Terenkol	21.12.2021 KZ60UKR00006892	22,470	0/0
			25.12.2022 KZ82UKR00018136	22,470	0/0
23	Pavlodar, 16, Kataeva str.	ATC – 54 Pavlodar city	21.12.2021 KZ66UKR00006881	28,697	0/0
			27.12.2022 KZ10UKR00018268	28,697	0/0
South Kazakhstan region					
24	Shymkent city, Al'Farabi region, Tashkent road, 17A	COD Shymkent city	KZ83VDD00149428 dated 27 August 2020.	15,878	0/0
			17.01.2023 No. KZ39UKR00019201	15,878	0/0

#	Location adress	Name of division	Date of submission No. of declaration / No. of authorisation	Volume of declared emissions, tonnes/year	Volume of declared waste volumes, hazardous/non-hazardous
Turkestan region					
25	25 Zhetysay village. Zhetysai district	Zhetysai LTC	21.12.2021 No. KZ31UKR00006735	28,971	0/0
			22.12.2022 № KZ74UKR00017989	28,971	0/0
Zhambyl region					
26	Taraz city, Isatay str.	Taraz industrial base	21.12.2021 NO. KZ84UKR00006751	1,569	0/0
			25.12.2022 № KZ77UKR00018129	1,569	0/0
Almaty region					
27	Almaty Turksib district, Kommunarov str. 70A	ECHO-RDT Almatytelecom	21.12.2021 № KZ04UKR00006833	1,54	0/0
			25.12.2022 № KZ23UKR00018131	1,54	0/0
28	Almatinskaya str. N. Nazarbayev 240B	Branch JSC ‘Kazakhtelecom JSC Service factory Administrative building	21.12.2021г. № KZ96UKR00006826	0,665	0/0
			25.12.2022 № KZ50UKR00018130	0,665	0/0
29	‘DIT’ Kazakhtelecom JSC	Almaty region, Almaty city Medeusky district Alatau mkr. Ibragimova street #35/8	04.07.2022 № KZ49VDD00118418	2,2935	0/0
Total Declarable Impacts:				1112,52	0/0

The timely issuance of permits for emissions into the environment, preparation and submission of Declarations on environmental impact, development of waste passport data, project materials in the field of environmental protection, as well as the provision of actual calculations on emissions into the environment, submission of reports on PEC, 2-TP air and Reports on inventory of hazardous waste by regions are carried out by the involved specialists on the basis of the contract with the Branch of Kazakhtelecom JSC Service Factory.

Primary information on sources of pollutant emissions and sources of waste generation and accumulation in the regions of Kazakhtelecom JSC is collected and provided by specialists of the production and economic support centre (PESC) of the Service Factory. Further, this information is transferred to the third-party organisation rendering services to Kazakhtelecom JSC in the field of environmental reporting on the basis of the agreement concluded with the Branch of Kazakhtelecom JSC Service Factory.

On the basis of the data collected by the specialists of CPWC and calculations made by the involved specialists, calculations of actual emissions into the environment are carried out, quarterly reports on the plan of environmental protection measures and PEC were submitted to the authorised bodies, statistical reporting 2-TP air, report on inventory of hazardous waste is submitted annually.

6. Wastes generated in the course of business activities

According to the information submitted to the auditor on the technological regulations of operations at the enterprise and technical characteristics of the equipment used, as well as during the interviewing of specialists of subdivisions of Kazakhtelecom JSC's Branches, it was established that the following types of hazardous waste are regularly generated at the sites of regional subdivisions:

1. decommissioned electronic-electrical equipment 200135*;

2. lead accumulator batteries 160601*;

3. combined packaging (metal, polyethylene, glass) 150105;

4. paper cardboard (waste paper) 200101;

5. waste car tyres 160103;

6. luminescent lamps and other mercury-containing waste 200121*;

7. synthetic motor, transmission and lubricating oils 130206;*

8. ash residue boiler slag and ash dust 100101;

9. used batteries 160605; 9. batteries 160605;

10. furniture 030105;

11. used air filters 150203;

12. used oil filters 160107*;

13. Oil-contaminated soil 170503*;

14. oily rags 150202*;

15. paintwork containers 080199;

16. used spare parts 160199;

17. discarded telecommunication equipment 160214;

18. written-off telecommunication equipment 160216;

19. office equipment 200136;

20. copper cable scrap 170411;

21. Solid municipal waste (mixed municipal waste) 200301.

Wastes marked with '*' are classified as hazardous waste.

Hazardous waste passports for these types of wastes were revised and registered for Kazakhtelecom JSC's Affiliated Branches in 2023, defining the methods of waste accumulation and disposal. The list of wastes generated in the subdivisions of Kazakhtelecom JSC, for which waste passports have been developed, does not include such types of wastes as: written-off motor vehicles, scrap metal, fibre-optic cable waste, antifreeze (coolant).

The auditor was provided with the Reports on inventory of wastes submitted only by the Service Factory of Kazakhtelecom JSC without taking into account the wastes, which were transferred to the balance of the Directorate 'Telecom-complekt'.

Having analysed the submitted reports for 2021-2023, it was found that the system of waste collection and disposal at the enterprise as a whole is provided for. The internal document turnover on writing off fixed assets and transfer of written off equipment, as well as released cable copper scrap, telecommunication means, etc. is established between Kazakhtelecom JSC's branches. These wastes are transferred to two branches of Kazakhtelecom JSC: Service Factory and Telecom Komplekt Directorate, according to the approved list of collected wastes. The transfer is made on the basis of the «List of wastes (written off fixed assets and materials) transferred for utilization».

Accounting of consumables, which are transferred to the status of waste after their use in the subdivisions of the branches of Kazakhtelecom JSC.

It is not feasible to provide a comprehensive account of the volumes of waste generated and accumulated in the warehouse, which includes items such as mercury-containing lamps, packaging, waste tyres, waste motor oil, coal ash, waste batteries, furniture, oil and air filters, oily rags, paper and cardboard. The reporting of the formation and movement of these materials between subdivisions in the regions is not consistently maintained. Those with material responsibility and management of subdivisions in the regions (regional centre, district centre, rural settlement) have not accounted for all types of hazardous waste generated at the sites, nor have they ensured safe storage and subsequent transfer for disposal. This is in contradiction with the documented procedure, CT/DP-01-23-09. Annex 11 to the Order of Kazakhtelecom JSC, which outlines the company's approach to production and consumption waste management.

Out of the 21 types of waste generated as a result of the company's economic activities, only 12 types have been recorded by the Kazakhtelecom JSC branches, representing 57% of the total amount of certain waste.

Table 6. Information on the volumes of waste generated according to the Report

#	Type of waste	2021 NF report	2021 Actual tonnes/year	2022 NF report tonnes	2022 Actual tonnes/year	2023 NF Report	2023. Actual tonnes/year
1	Mixed municial waste 200301	39,6	no data	855,9	no data	3227,52	no data
2	Stone scrap copper	-	no data	-	108,35195 Info.UDS	No data provided	2712954 Info.UDS
3	Office equipment	-	4,178	-	no data	No data provided	19,481
4	Decommissioned telecommunication 160216	-	no data	-	no data	No data provided	no data
5	Decommissioned telecommunication 160214	-	no data	11,937	7,670	13,66	no data
6	Waste parts 160199	-	no data	-	no data	No data provided	no data
7	Paintwork containers 080199	-	no data	-	no data	No data provided	no data
8	Oiled rags 150202	-	no data	-	0,001 Info.UDS	No data provided	no data
9	Oil contaminated soil 170503	-	no data	-	no data	No data provided	no data
10	Used oil filters 160107	0,002	no data	-	0,01 Info.UDS	No data provided	0,029 Info.UDS
11	Furniture	-	no data	-	no data	No data provided	no data
12	Used batteries 160605	-	no data	-	no data	No data provided	no data
14	Ash residue boiler slag and ash dust 100101	14,337	no data	-	no data	No data provided	no data
15	Synthetic motor, transmission and lubricating oils 130206	0,043	0,1 Info.UDS	2,0	1,792 Info.UDS	0,531	2,02 Info.UDS

16	Luminescent lamps and other mercury-containing waste 200121	0,84	0,82 Info.UDS	15,71	0,35 Info.UDS	0,276	1,122 Info.UDS
17	Waste car tyres 160103	8,96	no data	-	0,92 Info.UDS	No data provided	1,0 Info.UDS
18	Lead rechargeable batteries 160601	5,245	46,623 Info.UDS	26,241	49,452 Info.UDS	43,56	92,3539 Info.UDS
19	Paper cardboard (macalature) 200101	-	no data	-	no data	No data provided	no data
20	Combination packaging (metal, polyethylene, glass) 150105	-	no data	-	no data	No data provided	no data
21	Decommissioned electronic-electrical equipment 200135	-	no data	-	no data	No data provided	No data provided

The auditor was provided with the contracts for 2021-2023, concluded with the enterprise 'Facility Management Group' LLP for the removal of solid domestic waste and its disposal; the contract with 'ECOROST' LLP, to which Kazakhtelecom JSC transfers for further utilisation the transferred production waste of 9 items: electronic-electrical equipment, batteries, mercury-containing waste, waste oil, waste paper, packaging, car tyres, furniture, waste cartridges).

'Facility Management Group' and LLP 'ECOROST' render services on removal of mixed municipal waste (MSW) - on removal of production waste from all production sites located in the regional subdivisions of the Branches of Kazakhtelecom JSC.

The purchase and sale agreement for written-off cable and wire products (cable copper scrap) is concluded between the Branch of Kazakhtelecom JSC DTC and the winning Company on the basis of the Protocol on the results of the auction on sale of cable scrap. Removal of cable scrap is carried out from the subdivisions of Kazakhtelecom JSC (Lots) declared at the auction by the organisation that won the auction.

7. Payment for emissions into the environment.

During the audit the tax reporting of Form 870.00 'payment for negative impact on the environment' for the period of 2022-2023 was studied. In this period the enterprise had 29 sites of III category, 9 sites of II category according to the Ecological Code of RK from 02.01.2021 and official decisions of territorial Departments of Ecology on determination of the enterprise category. The remaining sites are transferred to IV category, in this connection the enterprise is exempted from tax payments for emissions into the environment from 1 January 2022. According to the results of the audit it was determined that the declarations on payment for negative environmental impact in the form 870.00 for 2022-2023 for the sites of III and IIII category were submitted in full, except for:

- *tax reporting form 870.00 for emissions from ATS of Kazakhtelecom JSC in c. Terenkol, 99 Baitursynova Street, Terenkol district, Pavlodar region. Tax reporting form 870.00 to the Department of Tax Administration of Terekol district of Pavlodar region KDG.*

MF RK (tax department code 4507) for 2022-2023 was not submitted.

During the audit of tax reporting for emissions into the environment from mobile sources, the period 2022-2023 was analysed

The enterprise confirmed that the declarations on payment for negative impact on the environment in the form 870.00 were sent to 68 tax offices at the place of registration of mobile sources of the enterprise. Payments for emissions were reflected and paid in full. The list of submitted Forms 870.00 to tax offices by categories is given in Annexes 1 and 2.

The enterprise reports for actual volumes of negative impact on the environment, which does not contradict Article 575 of the Tax Code of the Republic of Kazakhstan.

Tax reporting of Form 870.00 to the relevant tax authorities is sent by branches of Kazakhtelecom JSC in accordance with paragraph 2 of Article 574 of the Code of the RK dated 25 December 2017 No. 120-VI of the Law on Taxes and Other Obligatory Payments to the Budget (Tax Code).

8. Inspection of the Audited Object.

Due to the large number of subdivisions and their production sites, the Auditor decided to visit the subdivisions of the Branches by regions.

The schedule of visits to the facilities of Kazakhtelecom JSC for external environmental audit has been agreed by the Chief Director for Strategic Management of Kazakhtelecom JSC.

In accordance with the plan schedule, the objective was to visit the head offices of Kazakhtelecom JSC branches and their subdivisions in Almaty, the Central Office in Astana, and the regional subdivisions of Kazakhtelecom JSC in Zhambyl oblast (Southern region), Kostanay oblast (Northern region), and Aktobe oblast (Western region). The regional subdivisions of Kazakhtelecom JSC were visited between 15 March and 30 April 2024.

The remaining regional subdivisions were examined using the materials and documentation provided by Kazakhtelecom JSC's branches to the Auditor for the period 2021-2023.

The visit to the regional subdivisions of Kazakhtelecom JSC was conducted from 15.03.2024 to 30.04.2024.

During the Environmental Audit, introductory meetings and interviews were held with the heads of Kazakhtelecom JSC's affiliated branches and regional branches of Kazakhtelecom JSC at the TECHNICAL HUB OF BACKBONE COMMUNICATIONS AND TELEVISION NETWORK, DESED, SF, DTC, and DIT production sites and

subdivisions and materially responsible persons in the field.

During the inspection of production sites, the following environmental aspects were considered in line with the commitments of Kazakhtelecom JSC on ESG principles:

- The audit revealed that the enterprise's documentation developed for the Kazakhtelecom JSC branches lacks sufficient reflection of the sources of environmental impact. During the audit, the regional subdivisions were found to have inadequate records of pollutant emissions into the atmosphere, their operational mode, volumes and types of consumables used, and wastes generated in the course of economic activity.

- introduction of energy-saving equipment in Kazakhtelecom JSC's subdivisions

- motion sensors have been installed on lighting devices, LED lamps and lighting fixtures at all Kazakhtelecom JSC production sites and subdivisions, as well as in administrative buildings and industrial sites. These sensors have replaced mercury-containing lamps. The number of printers and scanners in individual offices was reduced by installing only one printing and scanning device per floor, which resulted in a notable decrease in energy consumption.

- in the Zhambyl region, a 4.3 kWh solar battery complex, representing a renewable energy source (RES), has been installed and is in operation at the Korasai Batyr MRS in Korday village, within the Taraz regional subdivision of Kazakhtelecom JSC.

- consumption of heat energy received from the central CHPP for heat supply of administrative buildings was reduced: in Kostanay regional subdivision heat points were equipped with installation of thermoregulators controlling supply and return temperature and temperature regime of the external environment, which as a whole leads to a reduction in the consumption of hot water for heating.

- in order to reduce the use of motor transport and fuel consumption for motor transport, subdivisions of Kostanay region are implementing a new initiative: the movement of specialists servicing subscribers of Kazakhtelecom JSC by bicycle.

- to ensure continuous operation of the equipment, standby generators of electric power generation are installed at each production site and building of ADMINISTRATIVE AND UTILITY COMPLEX. The operation of DGAs is carried out in case of emergency power outages and in case of emergency power outages.

Materially responsible persons (MRP) have been appointed in the subdivisions to monitor motor hours in the logbook and maintenance schedules (MRO). Each DGA has a fuel reserve, which is stored in tanks of varying capacity depending on the DGA in question. In order to organise the system of management of waste generated from economic activities, the regional divisions (centralised and underground) have the capacity to store fuel in the tanks, the capacity of which depends on the capacity of DGAs.

- to organise the waste management system for waste generated from economic activities in regional subdivisions (central warehouse), district centres of LTU, LTC, production sites of TECHNICAL HUB OF BACKBONE COMMUNICATIONS AND TELEVISION NETWORK, storage facilities for industrial waste (ash and slag, used oil, tyres, batteries, scrap metal, broken equipment, etc.) have been provided. Additionally, sites for the installation of containers for MSW (mixed municipal waste) collection have been designated. The availability of auxiliary equipment (weighing facilities, lifting mechanisms) at the regional subdivision warehouses was established.

- it has been established that the subdivisions have developed a procedure for the disposal of equipment and vehicles, including the generation of waste, as well as the receipt, storage and disposal of waste generated in the course of economic activities. The DRS and DKB subdivisions have established a process for the write-off of equipment (telecommunication systems), the technical expertise of which is required, the commission write-off, the storage of said equipment in the warehouse and the transfer of said equipment to the balance sheet of the NF and DTC.

- during the audit, existing issues with the municipal waste management system and the transfer of generated production waste from regional divisions to the waste collector for utilisation were identified.

9. Identified inconsistencies in B subdivisions of Kazakhtelecom JSC's Branches.

In the course of the ongoing environmental Audit by means of inspection of production sites of regional subdivisions, the following violations were revealed.

1. The audited entity has established the fact of operation of 29 production sites of Kazakhtelecom JSC's subdivisions belonging to the IIII category in 2023 without Declaration of waste generation volumes.

This is a violation of the requirements of paragraph 4, item 3, item 4, item 3, article 110, item 8, article 41 of the Environmental Code of the Republic of Kazakhstan.

Code of the Republic of Kazakhstan. Responsibility for violations of this article is stipulated in accordance with

p.7 of article 110 of the Environmental Code of the RK and article 327-1 of the Code of Administrative Offences of the RK, which stipulate a fine for large businesses in the amount from two hundred to six hundred.

Also in the course of familiarisation with the submitted Declarations it was established that the Declarations on environmental impact were submitted by 'Service Factory' Branch of Kazakhtelecom JSC, BIN 190341004451.

This fact contradicts a number of articles:

- Clause 1 of Article 43 of the Civil Code of the RK 'A branch is a separate subdivision of a legal entity located outside its location and

carrying out all or part of its functions, including the functions of representation';

- Clause 3 of Article 43 of the Civil Code of the RK 'Branches and representative offices are not legal entities'.

- P.1 of article 110 of the Environmental Code of the Republic of Kazakhstan Declarations on environmental impact B local executive body of the relevant administrative-territorial unit must be submitted by 'Persons carrying out activities at facilities of III category (hereinafter referred to as declarant)'. According to paragraph 3 of Article 110 of the EC RK 'Declaration of environmental impact' must contain information on the name, organisational and legal form, business identification number and address (location) **of the legal entity'**.

In accordance with Article 12, Section 6 of the EC RK, an "operator" is defined as a physical or legal entity with ownership or other legal control over an object that negatively impacts the environment.

Due to the fact that 'Service Factory' is an isolated subdivision (branch) of Kazakhtelecom JSC and is not a legal entity, the submission of the declaration on environmental impact should be submitted by a legal entity of Kazakhtelecom JSC, BIN. 'Kazakhtelecom JSC, BIN 941240000193, to the local executive body of the relevant administrative-territorial unit.

2. According to the results of the audit, it was determined that declarations on payment for negative impact on the environment of Form 870.00 for 2022-2023 for objects of III and IIII category were submitted in full, except for:

- this is to certify that a declaration form 870.00 has not been submitted by KDG MF HR (tax department code 4507) for emissions into the environment from the PBX of Kazakhtelecom JSC in Terenkol village, 99 Baitirsynova street, Terenkol district, Pavlodar region. The aforementioned company is therefore in breach of the Environmental Ulterior Liability (EUL) regulations for the Terenkol district of Pavlodar oblast.

3. In the course of the audit it was revealed that the enterprise violated the system of accounting and provision of data to the environmental portal of the IAC in the field of environmental protection of information on generated and disposed production waste (Article 347 of the EC RK. Accounting in the field of waste

management). The annual waste inventory reports for 2021-2023 do not include all generated wastes from the production sites of Kazakhtelecom JSC's subdivisions. In accordance with paragraph 3 of Article 327-1 of the Code of Administrative Offences for submission of unreliable mandatory information stipulated by the environmental legislation of the Republic of Kazakhstan, penalties of six hundred monthly calculation indices are envisaged for large business entities.

4. Kazakhtelecom JSC's subdivisions revealed generation of wastes for which the company has not developed passports of hazardous wastes:

waste code 16 0106 - written-off motor vehicles,

waste code 16 01 04* - antifreeze,

waste code 10 11 03 - residues of fibre optic cable,

waste code 02 01 01 10 - metal waste.

Information on accounting for the generation and accumulation of these types of wastes is not included in the annual reporting to be provided by the NF of Kazakhstelecom JSC in accordance with Article 384 of the ECRC.

5. Having studied the 'Instruction on safety and labour protection during works on fiber-optic cable (FOC) KT /ITB-04-11-1-23, Section 5.5, developed by Kazakhtelecom JSC specialists, which now sounds as follows: item 40 "upon completion of work with FOC (fiber-optic cable), wastes collected in a separate container or box shall be disposed of"; item 41 "waste textile rags and napkins shall be destroyed in a specially designated place, buried in a designated place in the field"; item 41 "waste textile rags and napkins shall be destroyed in a specially designated place, buried in a designated place". 41 'waste textile rags and napkins shall be destroyed in a designated place, in the field buried in a designated place'. These decisions contradict the requirements of Article 350 of the Environmental Legislation of the Republic of Kazakhstan and Article 328 of the Code of Administrative Offences of the Republic of Kazakhstan.

6. Kazakhtelecom JSC and its regional subdivisions carry out works using ozone-depleting substances, use of ozone-depleting substances for their transportation, storage and

maintenance of equipment containing ozone-depleting substances without a duly issued Permit for works using ozone-depleting substances, repair, installation, maintenance of equipment containing ozone-depleting

substances, transportation, storage, recovery, restoration, disposal of ozone-depleting substances issued by the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the Republic of Kazakhstan in accordance with Article 309 of the Environmental Code of the RK.

7. The customer branch of Kazakhtelecom JSC NF entered into contractual agreements with the contractor, FacilityManagementGroup LLP, for the period between 2021 and 2023. These agreements are identified by the following contract numbers: 562470/2021/1, dated 28 April 2021, and 806574/2023/1-1, dated 21 August 2023. In accordance with paragraphs 7 and 14, point 2.7 The contractor is responsible for refrigerant charging and the elimination of refrigerant.

Concerning 'FacilityManagementGroup' LLP, BIN 120940013902, according to the information from the electronic licensing portal it was established that there is no issued Permit for works with ozone-depleting substances, repair, installation, maintenance of equipment containing ozone-depleting substances, transport, storage, recovery, of ozone-depleting substances.

8. The branches of Kazakhtelecom JSC are as follows: ODS and SF have not provided the required annual reports on the inventory of ozone-depleting substances and the handling of such substances. This is contrary to the requirements set out in clause 9 of Article 310 of the Environmental Code of the Republic of Kazakhstan. 310 of the Environmental Code of the Republic of Kazakhstan.
In accordance with paragraph 1 of Article In accordance with Article 327-1 of the Code of Administrative Offences, large businesses may be subject to a fine of up to 200 monthly calculation indices for failing to submit or submit incomplete or untimely mandatory information as required by the environmental legislation of the Republic of Kazakhstan.

9. The branch of JSC Kazakhtelecom SF (hereafter, the Customer) entered into contractual agreements with LLP FacilityManagementGroup (hereafter, the Contractor) between 2021 and 2023 (Contract No. 562470/2021/1 dated 28 April 2021 and Contract No. 806574/2023/1-1 dated 21 August 2023). In accordance with clause 2.9 of the aforementioned paragraph, 1. The contractor is responsible for the removal, transportation and disposal of MSW.

Regarding Facility Management Group LLP, BIN 120940013902, according to the information from the e-licensing portal the following has been established:

- the enterprise has not submitted a Notice for carrying out entrepreneurial activity on collection, sorting and (or) transporting of non-hazardous waste, let alone its disposal,

- this enterprise does not have an environmental permit and the conclusion of the state environmental expertise for MSW waste disposal.

Performance of the above mentioned works by the enterprise, which does not meet the requirements of the legislation, leads to non-compliance of Kazakhtelecom JSC itself with the environmental legislation.

In accordance with Article 331 Business entities that are waste generators are responsible for ensuring proper management of such wastes from the moment of their generation until the moment of transfer in accordance with paragraph 3 of Article 339 of this Code into the possession of the person carrying out operations on recovery or disposal of wastes on the basis of a licence.

In accordance with the 'polluter pays' principle, waste generators and current and former owners of waste are responsible for ensuring compliance with environmental requirements for waste management until the moment of transfer of such waste into the possession of a person carrying out waste recovery or disposal operations under a licence in accordance with Article 336 of this Code, except in cases where this Code stipulates otherwise.

It is the responsibility of municipal waste generators to ensure compliance with environmental requirements for waste management from the moment of waste generation until the moment of its transfer to persons carrying out waste collection, recovery or disposal operations.

In accordance with paragraph 3 of Article 337 of the Environmental Code of the RK, the undertaking of entrepreneurial activities in relation to the collection, sorting and (or) transportation of waste, as well as the recovery and (or) destruction of non-hazardous waste, is prohibited unless the relevant notification has been provided.

In accordance with paragraphs 3-4 of Article 344 of the Code of Administrative Offences, penalties for violation of environmental requirements for waste management operations are provided for large business entities in the amount of 300, 500 monthly calculation indices.

10. In the period from 2021-2023, the Branch of Kazakhtelecom JSC SF (the Customer) concluded contracts with ECOROST LLP (the Contractor) (Contract No. 42/02-569-2023 dated 24.02.2023), on the basis of the concluded Contract the Contractor undertakes to remove the Wastes transferred by the Customer on the basis of Annex 1 to the Contract and guarantees qualitative rendering of Services on hazardous waste disposal.

TOO 'ECOROST' BIN 190240016941 according to the information from the electronic licensing portal, the following has been established:

This enterprise does not have a Licence for performance of works (rendering of services) on processing, neutralisation, recycling and (or) destruction of hazardous waste, availability of which is regulated by p.1 of article 336 of the Ecological Code of RK. According to the Environmental Code of the Republic of Kazakhstan, enterprises engaged in hazardous waste disposal are obliged to obtain a licence to perform works and render services in the field of environmental protection for the relevant sub-activity in accordance with the requirements of the Law of the Republic of Kazakhstan 'On Permits and Notifications';

this enterprise does not have an environmental permit and the conclusion of the state environmental expertise for processing or disposal of mercury-containing lamps, waste oil and accumulator batteries. There is only a conclusion on the right to engage in activities on recycling and disposal of office equipment, recycling and disposal of household appliances and industrial equipment, disposal of PVC waste, black, non-ferrous, precious metals with subsequent implementation (conclusion on the draft environmental impact assessment No. KZ05VDC00078454 of 03.05.2019

conclusion on the draft standards KZ12VDC00079783 dated 13.08.2019). maximum permissible emissions

In accordance with Article 331 Business entities that are waste generators are responsible for ensuring proper management of such wastes from the moment of their generation until the moment of transfer *in accordance with paragraph 3 of Article 339 of this Code into the possession of the person carrying out the waste recovery or disposal operations on the basis of a licence.*

According to article 339, paragraph 3, 'In accordance with the "polluter pays" principle

According to Article 339, paragraph 3, 'In accordance with the polluter pays principle the waste generator, current and former owners of waste are responsible for for ensuring compliance with the environmental requirements for waste management until the moment of transfer of such waste into the possession of the person carrying out the operations on recovery or disposal of waste under a licence in accordance with Article 336 of this Code, except as provided for in this Code.

In accordance with paragraphs 3-4 of Article 344 of the Code of Administrative Offences, penalties for violation of environmental requirements for waste management operations are provided for large businesses in the amount of 300, 500 monthly calculation indices.

11. The territories of motor transport sites and garages are full of written-off vehicles and special equipment. The terms of storage of hazardous waste and vehicles are violated in accordance with the requirements of paragraphs 1 and 3 of Article 320 of the Environmental Code of the Republic of Kazakhstan.

In accordance with paragraph 8 of Article 328 of the Code of Administrative Offences of the Republic of Kazakhstan, violation of the terms of waste accumulation shall entail a fine in the amount of one hundred per cent of the rate of payment for waste disposal in respect of the amount of accumulated waste for each day in excess of the term established by the environmental legislation of the Republic of Kazakhstan.

12. Underground and above-ground tanks for the draining and accumulation of used oil are located at the production sites of the Automobile Transport Shop of the SF of the Branch of Kazakhtelecom JSC, which previously housed automobile workshops, including engine shops and locksmith shops. At present, the workshops have ceased operations and vehicles are being serviced at third-party service stations under contract. The underground tanks, which have been contaminated with oil products and accumulated oil sludge, remain in situ. The tanks lack an airtight seal, allowing rainwater and floodwater to enter and accumulate inside. The result of this is a mixing of oily waste with rain and flood water in underground and above-ground tanks, which presents a risk of pollution of the environment (land resources and groundwater) with oil products.

In line with Article 337, paragraph 3 of the Code of Administrative Offences of the Republic of Kazakhstan, large businesses will be liable for a fine of 1,000 monthly calculation indices for pollution of land with hazardous chemical substances that has not caused environmental damage.

13. Container sites for solid waste collection at the sites of Kazakhtelecom JSC's subdivisions are in unsatisfactory condition:

- container yards are placed on the ground surface, which leads to rapid corrosion of containers;

- The storage area lacks protection from precipitation, as there is no roof or lids on the containers. Furthermore, the surrounding area is cluttered with other types of waste.

- the containers are in poor condition (rusty, with holes, and without lids) or there are tanks installed that cannot be serviced by rubbish trucks.

- container sites are located in the furthest parts of the sites, which complicates the process of storage of MSW generated, as well as the access of special vehicles for their unimpeded emptying.

14. There is currently no MSW removal schedule in place at the container sites of the subdivisions. The containers are placed in a haphazard manner, without consideration of the required capacity for each site. Consequently, containers are overfilled, and the order of municipal waste removal from administrative buildings and production sites is not adhered to.

This is particularly evident in rural areas and district LTCs. In these locations, waste removal is conducted less than once a month, and the installation of containers is incomplete.

This is especially noticeable in rural areas, in district LTCs. There, waste removal is carried out less than once a month, and containers are not installed everywhere.

15. It has come to our attention that there are issues with waste incineration at the regional subdivisions of Kazakhtelecom JSC. The accumulation of MSW at district centres has been ongoing for some time, and we are working to resolve this. In the event of non-compliance with the requirements for air and fire safety during waste storage or burning in accordance with Article 336 of the Code of Administrative Offences of the Republic of Kazakhstan, large businesses will be liable to a fine of five hundred MRP.

16. The regional divisions' warehouses are filled with obsolete telecommunication and office equipment that has been stored for over two years without being removed for disposal by the enterprise waste collector.

17. Storage of flammable, toxic waste in the basements of administrative buildings contributes to the emergencies (fire, acute poisoning of personnel, spillage, destruction during transportation) and

creation of Environmental Risks.

The hazardous properties of hazardous waste are:

- flammability (used oil and oil filters, office equipment and CCT);

- containing an increased concentration of poisonous chemical substances that have a corrosive effect (batteries);

- containing acute toxicity, containing mercury compounds (RSL, DRL).

18. The Central Office of Kazakhtelecom JSC lacks a Department of Ecological Safety and Environmental Protection, staffed with qualified specialists performing the following duties:

accounting of produced emissions into the environment, formation, storage and disposal of wastes, use of ozone-depleting substances, as well as submission of reporting;

- organisation of waste management activities (conclusion of contracts for sale/disposal/destruction of waste, waste accounting, control of its transfer to specialised organisations);

- receiving and analysing quarterly reports from the Branches on waste inventory, freon use, implementation of environmental protection measures;

- obtaining the necessary environmental permits (for work with ozone-depleting substances), etc. by the Branches

- collection of information and annual submission of reports on waste inventory, use of ozone-depleting substances, etc. stipulated by environmental legislation;

- preparation of information to the accounting service on actual emissions into the environment for submission of tax returns and payment of tax payments;

- setting up work in subdivisions in order to comply with the requirements of environmental legislation;

- raising the level of environmental literacy and qualification in the field of environmental protection and environmental safety by responsible persons;

- budget planning for environmental protection measures.

Conclusions: Kazakhtelecom JSC is the largest telecommunication is a dynamically developing enterprise, company and national telecom operator. Commercial activity of the company is accompanied by emissions and formation of municipal and industrial wastes arising in the course of heat supply of premises, operation of reserve power supply sources, equipment failure, construction and installation works and other processes. As a natural resource user, the company is obliged to comply with environmental legislation and minimise its environmental impact.

The Company should pay attention to timely removal of municipal and industrial waste by all Branches, prompt execution of environmental documentation and submission of reports, as well as payment of tax payments for taxable facilities. Implementation of energy-saving technologies, separate waste collection, fulfilment of the minimum list of environmental protection measures, such as landscaping and improvement of own territories, water saving and staff professional development are also important steps.

The company's facilities are categorised as having minimal environmental impact, so the requirements for compliance with environmental legislation are low. Nevertheless, the company is advised to follow these requirements in line with global sustainability trends and to contribute to environmental protection.

This audit report identifies and describes the violations and provides recommendations for their elimination. Addressing the observations listed in the report will minimise environmental impact and increase the company's environmental responsibility.

10. Recommendations on improving the level of environmental safety and reducing environmental risks in Kazakhtelecom JSC's subdivisions.

1. In order to eliminate non-compliance with the requirements of p.4 of article 110, p.8 of article 41 of the Environmental Code of the RK, to avoid responsibility under p.7 of article 110 of the Environmental Code of the RK and article 327-1 of the Administrative Offences Code of the RK, the enterprise of Kazakhtelecom JSC, BIN 941240000193, should submit to local executive bodies the Declaration on environmental impact of 29 sites with indication of quantity and types of wastes.

Declarations on environmental impact should be submitted by the legal entity Kazakhtelecom JSC, BIN 941240000193 as the operator of the facility in accordance with paragraph 9 of Article 418, paragraph 6 of Article 12, paragraphs 1 and 3 of Article 110 of the EK RK.

2. According to the results of the audit it was determined that the declarations on payment for negative impact in the environment of the form 870.00 for 2022-2023 for the objects of II and III categories are submitted

in full, except for:

- *tax reporting form 870.00 for emissions from ATC JSC 'Kazakhtelecom' in Terenkol village, 99 Baitursynova Street, Tereenkol district, Pavlodar region to the Department of State Department for Tereenkol district of the State Department of State Department for Pavlodar region KDG MF RK (tax department code 4507). Therefore, it is necessary to submit declarations of Form 870.00 for 2022-2023, reflecting emissions into the environment from the site in Tereenkol village of Pavlodar region with payment of taxes.*

3. To establish a system for providing primary data for the preparation of annual reports submitted to the state cadastre system via the website https://oos.ecogeo.gov.kz/ to the EIA, it is necessary to introduce a system of strict quarterly/semi-annual reporting on the inventory of waste generated in the regional subdivisions of the Branches on the created internal platform (e.g. ESG) with indication of submission deadlines at Kazakhtelecom JSC. The Branches must provide an electronic reporting form for waste inventory based on the prescribed Annual Report template, to be submitted to ICA EP. The submission of Annual Reports to the Eco-Portal should be facilitated with the participation of the Environmental Service of the CA CA 'AO' and the Environmental Service of the Central Administration of Kazakhtelecom JSC.

4. For the branches of Kazakhtelecom JSC's subdivisions, which generate hazardous wastes in the course of their economic activities, it is necessary to develop and submit for registration to the authorised environmental protection body the passports of hazardous wastes in accordance with clause 1 of Article 384 of the Environmental Code of the Republic of Kazakhstan. Hazardous waste passports are required for the following types of waste:

waste code 16 01 06 decommissioned motor vehicles,

waste code 16 01 04* antifreeze,

waste code 10 11 03 fibre optic cable residues,

waste code 02 01 01 10 metal waste.

Information on volumes of generation, transfer to specialised organisations to provide in the form of a waste inventory report by 1 March of the year,

following the reporting year in accordance with Art. 384 of the ECRC.

5. It is recommended that the Instruction on safety and labour protection during works on fibre optic cable (FOC) KT /ITB-04-11-1-23 be amended in paragraphs 40 and 41 of Section 5.5.

It is essential to implement a system for the collection and delivery of generated waste to the base, followed by transfer to the waste warehouse. The volume of generated waste must also be recorded in the waste logbook.

6. Kazakhtelecom JSC is required to obtain a permit from the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources before carrying out any maintenance of air conditioning equipment using ozone-depleting substances, including their transportation and storage.

7. The branch of Kazakhtelecom JSC NF (customer) should conclude contracts for repair and maintenance of air-conditioning equipment with contractors that have a Permit for works involving ozone-depleting substances, repair, installation, maintenance of equipment containing ozone-depleting substances, transportation, storage, recovery, restoration, utilisation of ozone-depleting substances. At the conclusion of the technical assignment to provide for the participant of the procurement tender to have a mandatory 'Permit' and qualified specialists in the staff of the enterprise to perform the works.

8. It is the responsibility of Kazakhtelecom JSC's subdivisions to carry out an inventory of ozone-depleting substances, determining the volume of such substances contained in equipment and technical devices in accordance with paragraph 7 of Article 310 of the Environmental Code of the RK.

In accordance with paragraph 9 of Article 310 of the Environmental Code of the RK, the subdivisions of ODF and SF of Kazakhtelecom JSC are required to submit the 'Report on inventory of ozone-depleting substances' initially as of 1 January, not later than the first quarter of the year following the reporting year. The report must be submitted again in the event of any changes. The report is to be submitted annually, no later than 1 January, in the first quarter of the year.

following the reporting period, the ODF and SF units of Kazakhtelecom JSC should submit the 'Report on handling ozone-depleting substances'.

9. The branch of Kazakhtelecom JSC NF (customer) should provide for removal of municipal wastes from the territories of regional subdivisions by using the existing in each region 'Centralised system of solid domestic wastes collection' organised by local executive bodies within the framework of provision of legal entities operating in the region under its jurisdiction. The 'Centralised system' is organised by the local executive body by means of a tender (tender) to identify solid domestic waste market participants that collect and transport solid domestic waste in accordance with the requirements of Article 368 of the Environmental Code of the Republic of Kazakhstan and the rules of municipal waste management. For this purpose it is necessary to conclude a contract for municipal waste removal with a waste disposal company servicing a certain region, having on its balance all necessary special equipment, permits for waste disposal (environmental emission permit or ecological permit, SEE conclusion on waste disposal project). Non-hazardous waste, among which MSW, can be transferred only to organisations that have notified the authorised body in the field of environmental protection about the beginning or termination of activities (Article 337 of the EK RK). Waste removal from the container site should be provided according to the removal schedule once a week.

10. It is recommended that the branch of Kazakhtelecom JSC NF, to the balance of which the wastes of all regional subdivisions are transferred, should conclude contracts for disposal of hazardous wastes with the enterprises having the Licence for performance of works (rendering services) on processing, neutralization, disposal and (or) destruction of hazardous wastes.

Guided by the Environmental Code of the RK Kazakhtelecom JSC should, first of all, provide for the sale of wastes to waste recycling plants (batteries, waste oil) operating in the territory of the RK.

Recommended enterprises:

- In the Republic of Kazakhstan, enterprises engaged in the full cycle of recycling used accumulator batteries include 'Kainar-AKB' LLP in Taldykorgan, 'Tandem-PV' LLP in Pavlodar, and 'AKB-Trading' LLP in Kokshetau. It is possible to conclude a contract with them on favourable terms.

- High Industrial Lubricants & Liquids Corporation LLP, based in Shymkent, Kazakhstan, is a leading waste oil recycling enterprise.

In other cases, in accordance with Article 330 of the ECRC, the generated waste should be recovered or disposed of as close as possible to the source of its generation. The transfer of hazardous waste for further treatment, neutralisation, recycling and (or) destruction of hazardous waste is permitted only to an organisation licensed to perform such operations (Article 336 of the EC RK). Wastes generated by Kazakhtelecom JSC's subdivisions in the course of business activities should be transferred for disposal to third-party organisations within a period not exceeding six months, in accordance with the approved schedule. In line with Article 330 of the ESC of RK, it is recommended that Kazakhtelecom JSC transfer generated waste for utilisation or destruction as close as possible to the source of its generation.

11. In accordance with paragraph 3 of Article 320 of the ECRC, vehicles belonging to Kazakhtelecom JSC's subdivisions that are no longer in use must be transferred for disposal to third-party organisations within a period of no longer than six months, in accordance with the approved schedule. In accordance with Article 331 of the ECRC, business entities that generate waste are responsible for ensuring proper management of waste from the moment of its generation to the moment of transfer to the person carrying out operations on recovery or disposal of waste on the basis of a licence.

12. It is recommended that cargo transport shops' production sites, as well as buried and above-ground tanks for the accumulation of used oil from the previously maintained own fleet of vehicles, be inspected, removed and sold. In line with current best practice for the collection and transportation of used oil, metal barrels with a capacity of 200 litres represent the most convenient and suitable option. These barrels can be installed in a closed room as they accumulate, hermetically sealed and, if necessary, loaded by publicly available special equipment (loader, manipulator). The storage of used oil in underground and above-ground tanks is no longer a relevant practice. Furthermore, the presence of unsealed tanks with accumulated oil sludge at the sites contributes to the unauthorised accumulation of oily waste, pollution of land resources and groundwater, and prevents standard separate accumulation.

of used oil and antifreeze.

13. It is recommended that a container site for the accumulation of municipal waste (MSW) be located on a hard asphalt or concrete surface within each subdivision of Kazakhtelecom JSC. The possibility of treating the site with disinfectant should also be considered. It is recommended that plastic containers with lids be installed to prevent the burning of waste and the contamination of the surrounding area by precipitation. It is recommended that plastic containers with lids be installed to prevent the burning of waste, precipitation, and the spreading of MSW around the territory.

14. In order to exclude overfilling of MSW container at the production site and territories of administrative and household complexes (ADMINISTRATIVE AND UTILITY COMPLEX), it is necessary to calculate the daily volume of MSW generation from the number of working personnel, according to the approved norms of generation and accumulation of municipal waste in the regions where the production site and ADMINISTRATIVE AND UTILITY COMPLEX are located (Annex 5). Having calculated the amount of generated waste from each site, it will be possible to determine the required number of containers at the site and to agree with the waste disposal company on the schedule of waste removal from each site, which will reduce the expenditure of financial resources for the removal of MSW and exclude overfilling of containers.

15. In order to exclude non-compliance with the requirements on air protection and fire safety when storing or burning waste in accordance with Article 336 of the Code of Administrative Offences of the Republic of Kazakhstan, Kazakhtelecom JSC should provide its Branches and their subdivisions with access to the centralised system of municipal waste removal by regions. Provide for an internal order on administrative responsibility for burning rubbish at the production sites of Kazakhtelecom JSC.

It is imperative that Kazakhtelecom JSC's branches integrate data from the programme for accounting of purchased goods received to warehouses (SAB) with the programme for writing off equipment in order to achieve a comprehensive accounting of written off equipment. Furthermore, the possibility of planning the writing off of equipment in operation according to its service life should be enabled.

Wastes generated by Kazakhtelecom JSC's subdivisions as a result of their economic activities should be transferred for disposal to third-party organisations within a period not exceeding six months, in accordance with the approved schedule. In line with Article 330 of the EC RK, Kazakhtelecom JSC is advised to transfer generated waste for utilisation or destruction as close as possible to the source of its generation. It is recommended that the enterprise's subdivisions transfer their waste to

production to a specialised enterprise operating in the given region.

16. Exclude storage of hazardous waste in basements of administrative buildings. Provide for storage of hazardous wastes generated in the course of economic activities at Kazakhtelecom JSC's subdivisions in separate buildings or container-type premises with the possibility of access for special vehicles.

The following accumulators should be provided in waste storage warehouses:

- hermetic tanks for storage of liquid oily wastes with the capacity not more than 200 litres,

- plastic recycling containers with a lid on wheels with a capacity of not less than 240 litres for storage of waste contaminated with oil products,

- containers for the safe and efficient transportation of fluorescent lamps. Demercurisation kits are designed for the safe disposal of mercury-containing waste. Mesh containers for the secure storage and temporary storage of plastic containers.

- racks for storing decommissioned equipment,

- an open area with hard surface for storage of scrap metal.

17. It is recommended that an environmental service/department of environmental protection be established and centralised in Kazakhtelecom JSC. This department should be staffed with an ecologist who will oversee the work of the staff in the following areas:

-Management of production and solid waste (conclusion of contracts on implementation/disposal/destruction of wastes),

- Receiving and analysing quarterly reports from branches on inventory of wastes, freon use, implementation of the following issues

- Supervising the annual submission of waste inventory reports and monitoring the use of ozone-depleting substances. In accordance with environmental legislation

- Supervising matters pertaining to the annual submission of reports on waste inventory, utilisation of ozone-depleting substances, and other relevant issues.

- Preparing information for the finance department for filing tax returns related to environmental emissions.

- Organising work in subdivisions to ensure compliance with environmental legislation requirements.

- Overseeing matters pertaining to the clearance of responsible individuals in branches,

enhancing the proficiency of personnel in environmental protection and safety, and ensuring compliance with environmental regulations environment and environmental safety.

18. In order to comply with the implemented standards of the integrated management system and ESG principles, Kazakhtelecom JSC will provide the following environmental protection measures as part of the Roadmap:

- Landscaping of territories within the landscaping areas allocated by the regional departments of natural resources. Contribute to the restoration of areas of the state forest fund affected by forest fires in the Kostanay and Abay regions as part of image projects, carbon footprint reduction initiatives, and the introduction of sustainable development principles.

- The implementation of a publicity campaign to encourage the separate collection of solid domestic waste by B subdivisions of Kazakhtelecom JSC will take the form of information posters and brochures, video clips, and the installation of containers for the separate collection of waste and recyclable materials at the territory of the branches of Kazakhtelecom JSC.

- Further measures will include the introduction of electronic document management, the reuse of waste paper, and other initiatives.

Conclusions

Kazakhtelecom JSC is a rapidly evolving enterprise, the largest telecommunications company and national telecommunications operator. The company's commercial activities give rise to emissions and the formation of municipal and industrial waste. These arise in the course of heating premises, the operation of backup power supply sources, equipment failure, construction and installation works and other processes. As a natural resource user, the company is required to comply with all relevant environmental legislation and to minimise its environmental impact.

It is the responsibility of all branches of the company to ensure the prompt removal of municipal and industrial waste, the timely execution of environmental documentation and the submission of reports, as well as the payment of tax payments for taxable facilities. The implementation of energy-saving technologies, separate waste collection and fulfilment of the minimum list of environmental protection measures, such as

The company's development of its own landscaping, water conservation and staff development initiatives are also important steps.

The company's facilities are categorised as having minimal environmental impact, which means that the requirements for compliance with environmental legislation are relatively low. It is recommended that the company adhere to these requirements in line with global sustainability trends and contribute to environmental protection.

This audit report identifies and describes the violations and provides recommendations for their elimination. The elimination of the observations listed in the report will minimise the company's environmental impact and enhance its environmental responsibility.

IE ‘Ecoexpertservice’ A.D. Mikhailichenko.

Licence 02456P dated 28.11.2018.

Attachment 1.

The submission of a declaration on the payment for the negative environmental impact of Form 870.00 for stationary sources of Category II facilities is required.

#	Name of area	Address of area	Code NU	I quarter 2022	II quarter 2022	III quarter 2022	IV quarter 2022	I quarter 2023	II quarter 2023	III quarter 2023	IV quarter 2023
	Zhambyl region										
1	Zhambyl RUT of Kazakhtelecom JSC	Zhambyl village Asa	2102	+	+	+	+	+	+	+	+
2	Zhambyl RUT of Kazakhtelecom JSC	Zhambyl region, Zhualy district, B.Momyshuly village, village named after B.Momyshuly Rysbek batyr	2103	+	+	+	+	+	+	+	+
3	Korday RUT of Kazakhtelecom JSC	Zhambyl region, Korday district, Korday s.o.o., Korday village, Tole Bi str.	2104	+	+	+	+	+	+	+	+
4	T Ryskulovskiy RUT of Kazakhtelecom JSC	Zhambyl region, Turar Ryskulov district, Kulan village, Zhibek Zholy str.	2105	+	+	+	+	+	+	+	+
5	Merke RUT of Kazakhtelecom JSC	Zhambyl region, Merke district, Merke village, Ismailova str.	2106	+	+	+	+	+	+	+	+
6	Moyymkumskiy RUT of Kazakhtelecom JSC	Zhambylskaya, Moyymkum village	2107	+	+	+	+	+	+	+	+
7	Sarysuyskiy RUT of Kazakhtelecom JSC	Zhambyl region, Saudakent village	2108	+	+	+	+	+	+	+	+
8	Baizak RUT of Kazakhtelecom JSC	Zhambyl region, Baizak district, Sarykemer district, Sarykemer village Baizak batyr	2109	+	+	+	+	+	+	+	+
9	Talas RUT	Zhambyl region, Karatau city	2110	+	+	+	+	+	+	+	+

Attachment 1.

The submission of a declaration on the payment for the negative environmental impact of Form 870.00 for stationary sources of Category III (continuation)

#	Name of area	Address of area	Code NU	I quarter 2022	II quarter 2022	III quarter 2022	IV quarter 2022	I quarter 2023	II quarter 2023	III quarter 2023	IV quarter 2023
	East Kazakhstan region										
1	Avtozsky LTU Industrial site No.2-ATC village. Barshatas of Kazakhtelecom JSC	NCO, Ayagoz district, Barshatas village, Barshatas village, Abylaykhan 12	7103	+	+	+	+	+	+	+	+
2	Abai LTU Industrial site No.1 Karazuz village.	East Kazakhstan region, East Kazakhstan oblast, Abai district, Karaaul district, Karaaul village, Mukhametkhanov str. 83	7102	+	+	+	+	+	+	+	+
3	Beskaragai LTU Industrial site Nel -c. Beskaragai	VKO, Beskaragai s.o. 153 Seyfulina str.	7104	+	+	+	+	+	+	+	+
4	Kokpekta LTU Industrial site No. 3 ATC from Ulken Boken village. Ulken Boken	VKO, Kokpektinsky district, Ulken Boken village, Pochtovaya str. 5	7109	+	+	+	+	+	+	+	+
5	Zyryanovsky LTU Industrial site No. Zaisan Administrative building of Kazakhtelecom JSC.	VKO, Zaisan town Zhangeldina street 33	1804	+	+	+	+	+	+	+	+
6	Abayskiy LTU 'Administrative building in Karaaul village, Zaisan district, VKO	VKO, Abai district, Karaaul village, 53 Mukhamedkanov str.	7102	+	+	+	+	+	+	+	+
7	Zharminskiy LTU Industrial site No.3 - Administrative building, Zhangil Tobe settlement of Kazakhtelecom JSC.	VKO, Zharminsky district, Zhangittobe village, 9th quarter, 23, Zharminsky district	7106	+	+	+	+	+	+	+	+
8	Borodulikha LTU Industrial site No. 13-ATC c. Novaya Shulba JSC Kazakhtelecom	East-Kazakhstan region, Borodulikha district, Novaya Shulba village.	7105	+	+	+	+	+	+	+	+
9	Zyryanovsky LTU Industrial site No. Zaisan town, 37 Zhangeldina street LO 'Kazakhtelecom'.	VKO, Zaisan city, Zhangeldina street 37	1804	+	+	+	+	+	+	+	+

10	Borodulikha LTU Site No.1 - Administrative building, Borodulikha village Kazakhtelecom JSC	Borodulikha village, Borodulikha district, Borodulikha village, 56 Tauelsizdik str.	7105	+	+	+	+	+	+	+	+
11	Borodulikha LTU Site No.1-s. Borodulikha	Borodulikha VKO Borodulikha district, Borodulikha village, 36 Krupskaya str.	7105	+	+	+	+	+	+	+	+
12	East-Kamenogorsk city, Ust-Kamenogorsk city	Head enterprise Ust-Kamenogorsk city Site No.6 (AT-22) of Kazakhtelecom JSC	1816	+	+	+	+	+	+	+	+
	Karaganda region										
13	Association 'Long-distance communication' Branch 13 of joint stock company 'Kazakhtelecom', KZ LIC-24 Osakarovka	Association 'Dalnyaya Svyaz' Branch of joint stock company 'Kazakhtelecom', Llc-24 Karaganda',	3009	+	+	+	+	+	+	+	+
14	Association Dalnyaya Svyaz' Branch of Kazakhtelecom JSC	Karaganda region, Karaganda city, district named after M.V. Lomonosov. Kazybek bi Protective 36/1	3020	+	+	+	+	+	+	+	+
15	Association 'Long-distance communication' Branch 15 of joint stock company 'Kazakhtelecom', KZ LIC-24 Karkaralinsk',	Karaganda TUMS of Central RDT of Kazakhtelecom JSC	3005	+	+	+	+	+	+	+	+
16	Karaganda TUMS Central RDT of Kazakhtelecom JSC	Karaganda region, Karaganda city, Mira Boulevard 4, Karaganda str.	3029	+	+	+	+	+	+	+	+
	Kostanay region										
17	DPC of Kazakhtelecom JSC, Kostanai city	Kostanay region, Kostanay G.A., Kostanay, 20 Abilsay str.	3927	+	+	+	+	+	+	+	+
	Pavlodar region										
18	Pavlodar region, Bayanaul district, Bayanaul village, portable container	Pavlodar region, Bayanaul district, Bayanaul village, portable container	4504	+	+	+	+	+	+	+	+
19	ATC-34, Ekibastuz city, M. Zhusupa str. 42'	Pavlodar region, ATS-34, Ekibastuz city, 42, M. Zhusupa str.	4516	+	+	+	+	+	+	+	+
20	'ATC c. Terenkol JSC Kazakhtelecom JSC	Pavlodar region, Terenkol district, ATC c. Terenkol, 99 Baitursynova str.	4507	+	+	+	+	+	+	+	+
21	Pavlodar region, ATC-54-54, Pavlodar city, 16 Kataeva str.	ATC-54, Pavlodar city, Kataeva str. 16'	4515	+	+	+	+	+	+	+	+
	Turkestan region										
22	Zhetysai LTC of Kazakhtelecom JSC Turkestan, Zhetysai	Turkestan region, Zhetysay	5826	+	+	+	+	+	+	+	+

23	DIT Data Centre of Kazakhtelecom JSC	(Shymkent city, Shymkent city, Al-Farabi district Tashkent trakt, 17A		+	+	+	+	+	+	+	+
	Akmola region										
24	'DIT 'Kazakhtelecom JSC, '61109'	Akmola region, Kokshetau city, Abay street, # 108.		+	+	+	+	+	+	+	+
	North-Kazakhstan region										
25	'DIT' Kazakhtelecom JSC	Petropavlovsk Musrepova, 44		+	+	+	+	+	+	+	+
	Zhambyl region										
26	Taraz industrial base	Taraz Isatay Batyr str.		+	+	+	+	+	+	+	+
	Almaty region										
27	ECHO-RDT 'Almatytelecom' JSC	Almaty Turksibskiy district, 70A Komunarov str.		+	+	+	+	+	+	+	+
28	Branch of Kazakhtelecom JSC Service factory Administrative building	Almaty 2405 N. Nazarbayev str.		+	+	+	+	+	+	+	+
29	'DIT' of Kazakhtelecom JSC	Almaty region, Almaty city, Medeu district, 'Alatau' neighbourhood, #35/8 Ibragimova str		+	+	+	+	+	+	+	+

'+' - declaration of form 870.00 submitted, "-"- declaration of form 870.00 NOT submitted

Attachment 2.

The submission of a declaration on payment for negative environmental impact, Form 870.00, is required for mobile sources.

#	Name of area	Address of area	Code NU	I quarter 2022	II quarter 2022	III quarter 2022	IV quarter 2022	I quarter 2023	II quarter 2023	III quarter 2023	IV quarter 2023
	Zhambyl region										
1	'Korday RUT of Kazakhtelecom JSC'.	Zhambyl oblast, Kordai district, Kordai s.o., Kordai village, Tole bi str.	2104	+	+	+	+	+	+	+	+
	East Kazakhstan region										
2	Ayagozskiy LTU Industrial site No.2-ATS from. Barshatas of Kazakhtelecom JSC	East Kazakhstan region, Ayagozsky district, Barshatas s.o., Barshatas village, Abylaykhan 12	7103	+	+	+	+	+	+	+	+
3	Kokpektinsky LTU Industrial site No. 3 Ulken Boken	VKO, Kokpektinsky district, Ulken Boken village, 5 Pochtovaya str.	7109	+	+	+	+	+	+	+	+
4	Zyryanovsky LTU Industrial site No.1 Zaisan Administrative building of Kazakhtelecom JSC.	33 Zhangeldin street, Zaisan town, VKO	1804	+	+	+	+	+	+	+	+
5	Head enterprise Ust-Kamenogorsk Site No.6 (AT-22) AO Kazakhtelecom	VKO, Ust-Kamenogorsk city	1816								
	Karaganda region										
6	Association 'Dalnyaya svyaz' Branch of Joint Stock Company Kazakhtelecom, KZ LTC-24 Osakarovka.	Karaganda region, settlement Osakarovka 89 Karaganda str.	3009	+	+	+	+	+	+	+	+
7	Association 'Dalnyaya svyaz' Branch of Joint Stock Company Kazakhtelecom, LTC-24 Karaganda',	Karaganda region, Karaganda city, Karaganda, district named after M. Kazybek bi ul. Kazybek bi Protective 36/1 str.	3020	+	+	+	+	+	+	+	+
8	Association 'Dalnyaya svyaz' Branch of Joint Stock Company Kazakhtelecom, LTC-24 Karkaralinsk',	Karaganda oblast, Karkaralinsk 141 Aubakirov str.	3005	+	+	+	+	+	+	+	+
9	Karaganda TUMS of Central RDT of Kazakhtelecom JSC	Karaganda oblast, Karaganda city, 4 Mira Boulevard str.	3020	+	+	+	+	+	+	+	+

	Pavlodar region										
10	ATS-34, Ekibastuz city, 42 M. Zhusupa str.'	Pavlodar region, ATS-34, Ekibastuz city, 42, M. Zhusupa str.	4516	+	+	+	+	+	+	+	+
11	'ATS-54, Pavlodar city, Kataeva str. 16'	Pavlodar region, ATS-54, Pavlodar city, 16, Kataeva str.	4515								
	North-Kazakhstan region										
12	'DIT Data Centre of Kazakhtelecom JSC	Petropavlovsk Musrepova, 44	4814								
	Zhambyl region										
13	Taraz industrial base	Taraz Isatay Batyr str.	2115								
	Almaty region										
14	Branch of Kazakhtelecom JSC Service Factory Administrative building	Almaty 2406 N. Nazarbayev str.	6009								
15	DIT Data Centre of Kazakhtelecom JSC	Almaty region, Almaty city, Medeu district, 'Alatau' neighbourhood, #35/8, Ibragimova str.	6009								

Attachment 3.

The submission of a declaration on payment for negative environmental impact, Form 870.00, is required for mobile sources.

	Region		**Code NU**	**I quarter 2022**	**II quarter 2022**	**III quarter 2022**	**IV quarter 2022**	**I quarter 2023**	**II quarter 2023**	**III quarter 2023**	**IV quarter 2023**
16		Aktobe city DGD Aktobe city DGD for Aktobe region KDG of MF RK	0618	+	+	+	+	+	+	+	+
17		UGD for Baiganinsky district DHA for Aktobe region KDG MF RK	0605						+	+	+
18		UGD on Aitekebiy region DHA on Aktobe region KDG MF RK	0606						+	+	+
19		Mugalzhar District Department of State Revenue Department of Aktobe region KDG MF RK	0612						+	+	+
20		UGD on Khobdinsky region DHA for Aktobe region KDG MF RK	0615						+	+	+
21		UGD on Shalkarsky region DHA for Aktobe regionKDG MF RK	0617						+	+	+
22	Akmola	Akkol district DDG	0302						+	+	+

23		of Akmola region KDG MF RK	0304						+	+	+
24		UGD on Atbasar region DHA on Akmola region KDG MF RK	0307						+	+	+
25		UGD for Ereimentau region DHA for Akmola oblast KDG MF RK	0318						+	+	+
26	Region	SDO for Yesil region SDO for Akmola region KDG MF RK	0324						+	+	+
27		Karasaysky District SDO of Almaty Oblast SDO of Almaty Oblast KDG MF RK	0905						+	+	+
28	Almaty Region	UGD for Konaev city DHA for Almaty region KDG MF RK Almaty region	0913						+	+	+
29		Kurmangazinskiy District Department of State Revenue Department for Atyrau region KDG MF RK	1503						+	+	+
30		GD on Makat district DHA on Atyrau region KDG MF RK	1507						+	+	+
31		UGD for Zhylyoi district DHA for Atyrau region KDG MF RK	1507						+	+	+
32	Atyrau region	UGD for Atyrau city DHA for Atyrau region KDG MF RK	1510	+	+	+	+	+	+	+	+
33		UGD for Katon-Karagai district, DHA for East Kazakhstan region KDG MF RK	1802						+	+	+
34	VKO, East Kazakhstan Region, Katon-Karagai	UGD on Shemonaikha district DGD on East Kazakhstan region KGD MF PK	1812						+	+	+
35	Shu district of Zhambyl region	UGD on Shuskiy district DHA on Zhambyl region KDG MF PK	211						+	+	+
36		UGD on Burlinskiy district DHA on West-Kazakhstan region KDG MF PK	2703						+	+	+
37	West Kazakhstan Region	Kattalovo District SDO of the DHA for West Kazakhstan region KDG MF	2708						+	+	+

38		UGD on Karatubinskiy district DGD on West-Kazakhstan region KGD MF PK	2709								
39		UGD on Akzhanksky rayon DDG on West Kazakhstan oblast KGD MF PK	2716								
40		UGD on Uralsk city DHA on West Kazakhstan oblast KDG MF PK	2718								
41	Karaganda region	UGD for Aktogayskiy region SDO for Karaganda oblast KDG MF RK	3021								
42		SDO for Shet district SDO for Karaganda oblast KDG MF RK	3024								
43		Balkhash City SDO Karaganda Oblast SDO Karaganda region KDG MF RK	3025								
44		UGD for Zhezkazgan city DHA for Karaganda region KDG MF RK	3026								
45		Karazhal city SDO Karaganda region SDO KDG MF RK	3028								
46	Kyzylorda region	UGD for the Aralsk district DHA for Kyzylorda region KDG MF RK	3302								
47		Kyzylorda city SDO SDO for Kyzylorda region KGD MF RK Kyzylorda	3310								
48	Kostanay region KDG MF RK	UGD on Zhitikara region DHA for Kostanay region KDG MF RK	3904								
49		UGD on Sarykol region DHA on Kostanay region KDG MF RK	3914								
50		UGD for Rudny city DHA for Kostanay region KDG MF RK	3919								
51		UGD for the city of Arkalyk DHA for Kostanay region KDG MF RK	3925								
52	Mangistau Oblast	UGD on Beineu region DGD on Mangistau oblast KDG MF RK	4302								
53		Mangistau Region Mangistau Oblast Mangistau region Department of State Affairs	4304								

54		Aktau City DGD Mangistau Oblast DGD MF RK	4306						+	+	+
55		UGD on the district named after Magzhan Zhumabayev DHA on North-Kazakhstan region KDG MF RK	4803						+	+	+
56	Turkestan city	UGD on Turkestan city DHA on Turkestan region KDG MF RK	5820						+	+	+
57	Shymkent	UGD for Abay rayon DHA for Shymkent city KDG MF of RK	5904	+	+	+	+	+	+	+	+
58		SDO for Turan district SDO for Shymkent city KDG MF RK	5908						+	+	+
59	Zhetysu district Almaty city	Zhetysu District Department of the Almaty City Department of the City of Almaty KDG MF RK	6005	+	+	+	+	+	+	+	+
60	Astana	UGD for Saryarka district DHA for Astana city KDG MF RK	6203	+	+	+	+	+	+	+	+
61		UGD on Yesil district DHA on Astana city KDG MF of RK	6205	+	+	+	+	+	+	+	+
62	Zhetysu region	UGD on Alakol rayon DHA on Zhetisu oblast KDG MF of RK	7003						+	+	+
63		UGD on Panfilov rayon DHA on Zhetisu oblast KDG MF RK	7007						+	+	+
64		Taldykorgan Municipal Department of Taldykorgan city DHA for the region Zhetisu KDG MF RK	7010						+	+	+
65	Abay region	SDO for Semey city SDO for Abai region KDG MF RK	7111	+	+	+	+	+	+	+	+
66	Ulytau region	DHA for Zhanaarka district DHA for Ulytau region KDG MF RK	7202						+	+	+
67		UGD on Zhezkazgan city DHA on region Ulytau KDG MF RK	7304						+	+	+
68		Karazhal city SDO SDO for the region Ulytau KDG MF RK	7305						+	+	+