

SARYTOGAN
G R A P H I T E

Sarytogan Graphite Project

Stakeholder engagement plan

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1. Introduction

Sarytogan Graphite Ltd, through its 100% subsidiary Ushtogan LLP, is a 100% owner of the Sarytogan Graphite Project.

This Stakeholder Engagement Plan is for the Sarytogan Graphite Ore Mining and Processing Project. It is based on best practices, including EBRD standards and international requirements.

2. Project Description

The Sarytogan Graphite Project is a greenfield project that is scheduled to be completed in 2027. The project has completed the Mineral Resource Report (KAZRC Reports), which is signed in accordance with the KAZRC Code and estimates 229 million tons with an average grade of 28.9% Total Graphitic Carbon. The capacity of the open pit will gradually increase, while the initial volume of production is set at the level of up to 150 thousand tons of ore per year. This approach aims to ensure the construction and commissioning of the processing plant and the establishment of relationships with consumers at the beginning of operation. The projected plant is expected to process 150 kt per year of graphite ore and produce about 50 kt per year of graphite concentrate.

The site of the Sarytogan project is located in the Aktogay district of the Karaganda region (Figure 1, Figure 2). The nearest settlement is the village of Nura, about 10 km to the west. The city of Karaganda is located 190 km to the northwest, and the village of Aksu-Ayuly is 45 km in the same direction.

Access to the site is via an asphalt road from Aksu-Ayuly through Nura. The distance from this road to the proposed site of the flotation plant is about 7 km. The Balkhash-Karaganda road passes about 45 km to the northwest, and the northern section is crossed by the Karaganda-Aktogay road. The Almaty-Karaganda-Astana railway passes 105 km west of the site.

Graphite is a critical raw material used in the production of lithium-ion and other advanced batteries. The battery market is growing rapidly, and demand for graphite is predicted to double this decade.

3. Legislative norms and requirements

The legal provisions and requirements for public hearings and disclosure applicable to this Project include national legislation on Environmental Impact Assessment, EBRD requirements, EU legislation and international regulations. The main applicable requirements are presented in Appendix 2 to this report.

Figure 1 – Sarytogan Project graphite site

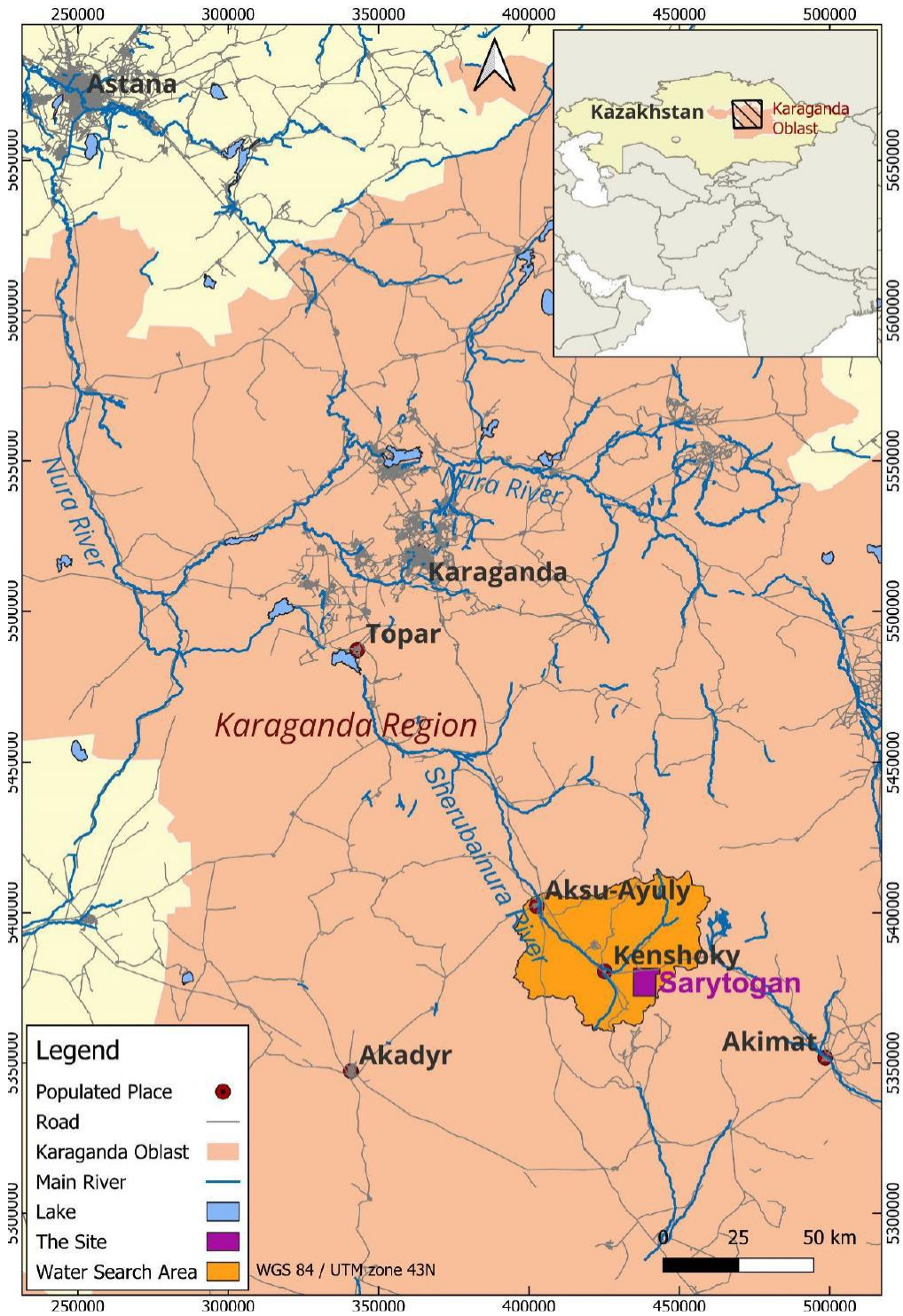
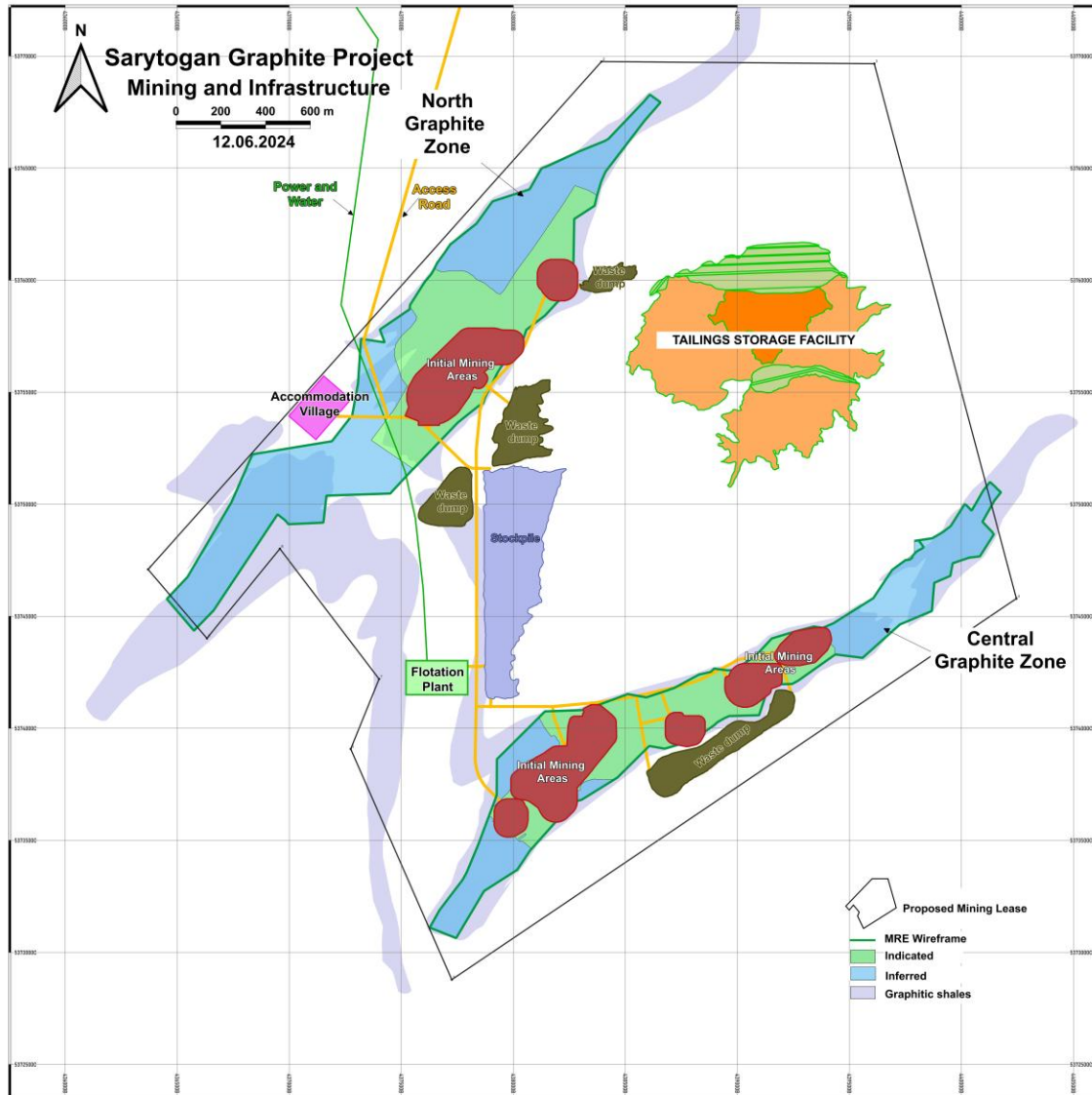


Figure 2 – Preliminary Master Plan of the Sarytogan Project



4. Stakeholder Identification and Analysis

Stakeholders are natural or legal persons who:

- are directly or indirectly affected by the implementation of the Project (or the Company's activities);
- have an interest in the Project or the Company and are therefore considered as interested parties;
- are capable of influencing the course of the project or the Company's activities.

There are two main categories of stakeholders: **external** and **internal**. This Engagement Plan focuses on working with **external** stakeholders. Interaction with **internal** stakeholders will be carried out by the relevant departments and employees of the Company.

Taking into account the stage of the Project as of June 2025, this initial version of the Stakeholder Engagement Plan was developed by the Company independently. In the future, as necessary, independent consultants in various areas will be involved.

At the moment, a list of key stakeholders has been identified (see Table 1). At the same time, the process of identifying them remains open and will be updated as the project develops.

Table 1: Project Stakeholders

№	Stakeholder Group	Main goals and interests	Key people/company	Frequency of Engagement
1	Local population (owners and tenants of land)	Protection of land rights, compensation, protection of health and the environment, safe living conditions, jobs, infrastructure, participation in decision-making.	TBD	TBD
2	Contractors and their employees (construction and infrastructure)	Labor safety, timely payment, stability of contracts, long-term cooperation, compliance with safety standards.	1.Tsentrgeolsjemka	By request
3	State executive bodies (Ministry of Industry and Construction of the Republic of Kazakhstan, Ministry of Natural Resources of the Republic of Kazakhstan, etc.)	Compliance with legislation, taxes, compliance with license conditions, state interests, sustainable development.	1. Minister of Industry 2.Vice-minister of Industry 3.Committee of Industry 4. Department of Subsoil Use 5. Committee for Environmental Regulation and Control 6.Kazakh Invest	By request

№	Stakeholder Group	Main goals and interests	Key people/company	Frequency of Engagement
4	Local executive bodies (akimats, maslikhats)	Job creation, social development of the region, tax revenues, tension reduction, investment.	1.Akimat of Karaganda city/district 2.Akimat of Shetsk district 3.Akimat of Agadyr village	By request
5	Buyers of finished products	Reliability and quality of deliveries, price stability, compliance with standards, compliance with deadlines.	TBD	TBD
6	Financial institutions	Return on investment, risk mitigation, ESG standards, transparency, financial reporting.	1.EBRD 2.ERMA	Quarterly
7	Suppliers of equipment, materials and their employees	Transparent procurement, timely payments, stable volumes, safe logistics.	TBD	TBD
8	Environmental and human rights NGOs	Reducing environmental damage, participating in monitoring, open information, protecting the rights of local residents.	TBD	TBD
9	Mass media	Access to reliable information, the possibility of independent coverage of the project, the openness of the Company.	TBD	TBD
10	Academic and research institutes	Access to data, scientific research, participation in	TBD	TBD

№	Stakeholder Group	Main goals and interests	Key people/company	Frequency of Engagement
	(geology, ecology, etc.)	expertise, technological development.		
11	International organizations and donors (EBRD, IFC, etc.)	Sustainability, compliance with standards, technical assistance, transparent management.	1.EBRD 2.ERMA	TBD
12	Transport and logistics companies	Transportation of goods, compliance with deadlines, safety, infrastructure development.	TBD	TBD
13	Insurance companies	Risk assessment, insurance coverage, damage minimization, construction and operation contracts.	1.Amanat	By request
14	Consulting and Engineering Companies	Design, feasibility study, audit, compliance with standards, international practices.	1.GR Engineering 2.Knight Piesold 3.Snowden Optiro	By request
15	Professional and industry associations	Protection of the interests of the industry, standards, exchange of experience, participation in a dialogue with the state.	1.KZ Chamber of Mines	Quarterly, annually

5. Previous Stakeholder Engagement

Description of previous interaction activities. In 2022-2024, as part of the implementation of the EIA sections to the Exploration Plan and the Mining Plan of the deposit, a number of public hearings were held in the village of Kezhek, Aktogay district.

The local population has a generally positive attitude to the project, which is recorded in the relevant minutes of public hearings.

Also, representatives of the Project are in constant contact with state and local executive bodies and constantly update the status of the project.

6. Program of interaction and publication of information

The Stakeholder Engagement and Communication Program is a clearly structured action plan that includes a timeline for the implementation of activities and the allocation of responsibilities. Its goal is to ensure the most effective and timely interaction with all relevant stakeholder groups.

For the successful implementation and subsequent updating of the Program, the following aspects will be taken into account:

- the content and format of stakeholder meetings, as well as the preferred channels for obtaining information for each group;
- the list of documents to be published, the timing of their publication and the languages used;
- places of placement of documents (in electronic or printed form);
- methods of notifying the public about the availability of information;
- availability of a feedback mechanism and opportunities for comments;
- the procedure for sending, reviewing and informing about the results of the consideration of the comments received.

The initial version of the Program is given in Table 2. In the future, it will be regularly reviewed and updated by the project team (Team) with the participation of the city administration, relevant ministries and departments, and, if necessary, with the involvement of consultants, throughout the implementation of the Project.

Table 2: Stakeholder Engagement Program

№	Activity	Responsibility	Result / Means of communication	Time
1	Stakeholder analysis and group segmentation	Team, Social Advisors	Stakeholder database; Internal reports	Within 2 months after the approval of the Program and continuously during the implementation of the project
2	Determining the format and topics of meetings with each group	Team, consultants	Meeting schedule, presentation materials, agendas	Within 2 months after the approval of the Program and continuously during the implementation of the project
3	Establishment of preferred channels for	Team, local administration	List of channels: personal meetings,	In parallel with the definition of

№	Activity	Responsibility	Result / Means of communication	Time
	obtaining information for each group		SMS, radio, websites, social networks, etc.	the format of the meetings
4	Defining the list and format of documents to be published	Team, project consultants, legal service	Approved list of documents; Post layouts	During the 1st quarter of the project
5	Setting the languages of publication	Team, translators, consultants	Translated and approved versions of materials	Before the first publication
6	Organization of public access to documents (offline and online)	Team, local administration, IT specialists	Placement on the website, in the akimat, libraries, recreation centers, etc.	From the moment of approval of key documents
7	Notification to the public of the posting of documents	Team, Press Office, Local Media	Announcements in the media, social networks, mailings	At least 7 days before each publication
8	Organization and conduct of consultations and public discussions	Team, akimat, relevant bodies	Meeting minutes, photos, lists of participants, opinions collected	At least 2 times a year or in key stages
9	Ensuring constant access to feedback	Team, IT support, administrator	Hotline, email, physical mailboxes	Throughout the project
10	Processing and registration of comments and appeals	Team, office work, social specialist	Log of appeals, classification, status of consideration	Within 10 working days after receipt
11	Informing applicants about the results of the consideration	Team, project secretariat	Answers by phone, in writing or by email	Within 5 working days after the decision is made
12	Annual Review and Update of the Program	Team, consultants, representatives of the akimat and ministries	Updated version of the Program, taking into account comments and experience	1 time a year, at the end of the calendar year

7. Grievance Mechanism

Complaints related to the Project should be directed to the contacts provided in Section 9 of this Stakeholder Engagement Plan (SEP). A standardized form for filing a complaint is provided in Appendix 1.

Currently, residents of the city can send appeals on issues related to the Project through the official website of the Company, by phone, e-mail or mail. These channels will continue to be the primary means of receiving complaints from the public (see contact details in section 9 of the SEP).

All complaints received are registered and transferred to the relevant departments of the Company for consideration. Telephone calls are processed by technical staff, and written ones are considered by the management. The response to the complaint is provided in writing within seven days from the date of receipt. Depending on the nature of the issue, the Company aims to resolve the issue promptly, usually within one week to one month.

In addition to the existing mechanism for receiving and considering complaints, additional dispute resolution procedures will be applied within the framework of the Project.

Complaints relating to construction works will be dealt with by the Project Team or the Contractor. Prior to the commencement of construction, the public will be informed (through the Project website and local authorities) about the contact information of the Project Team and the Contractor, as well as the available ways to submit applications.

Upon receipt of the complaint, the Project Team or the Contractor will take all necessary actions to address the complaint. In the event that the issue cannot be resolved immediately, longer-term measures will be determined to resolve it. The complainant will be informed of the proposed measures and next steps within 20 working days from the date of receipt of the complaint.

If the issue cannot be resolved or no response is required, the Project Team or the Contractor will provide a reasoned response with an explanation of the reasons and, if necessary, information on possible further instances to which the complainant can apply to consider the complaint.

In the event that the applicant is dissatisfied with the proposed or implemented solution, he/she has the right to use other legal mechanisms provided for by the legislation of the Republic of Kazakhstan.

8. Evaluation and monitoring

The results of stakeholder engagement will be recorded and publicly disclosed by the Project team. The team, together with local executive bodies, will continue to monitor the implementation of stakeholder engagement activities, based on the developed Key Performance Indicators (KPIs), covering the following aspects:

- The Stakeholder Engagement Program (program) is updated in a timely manner, and information about the Project is available to the public for comments;
- All activities provided for by the SEP and the plan for informing stakeholders are carried out according to the established schedule;
- Public consultations are documented and recorded;
- Complaints are recorded and tracked until they are resolved within a period of no more than 25 calendar days from the date of receipt (confirmed by an up-to-date register of complaints);
- Contracts with Contractors and subcontractors include obligations to comply with the requirements of the program;
- Annual reports on the implementation of the program and the handling of complaints are included in the overall public report on the environmental and social activities of the Project.

Based on these KPIs, the Project team will be able to effectively monitor the quality of interaction with stakeholders and, if necessary, make changes to the program.

All official materials will be distributed to stakeholders, including representatives of the local population.

The designated Public Relations Officer will be responsible for the implementation and monitoring of the implementation of the program, including the following tasks:

- Informing the public about the Project and collecting feedback;
- Receiving, recording and monitoring the implementation of complaints, including the timely preparation of responses and decisions;
- Monitoring the implementation of corrective measures on complaints;
- Regular analysis and updating of the PVS and mechanisms of interaction with the public to increase their effectiveness and compliance with the current stage of the Project implementation;
- Participation in the resolution of disputes and disputes;
- Participation in the preparation of the annual report on environmental and social indicators;
- Organizing and/or coordinating stakeholder engagement and grievance activities related to potential environmental impacts.

If necessary, especially when considering complex or sensitive issues, project managers and members of the Board of Directors can be involved in solving them.

9. Contact Information

Inquiries and complaints can be sent to the following addresses:

Contact person: Director of Ushtogan LLP, Nuss I.V.

Phone: +7 (727) 272 31 63;

El. mail: irma@sarytogangraphite.com;

Website: <https://sarytogangraphite.com.au/>

Postal address: 050000, Republic of Kazakhstan, Almaty
Panfilova St., 158, office 1.

Annex 1: Complaint Form

Sarytogan Graphite Project: Complaint Form	
Reg. № _____	
Full name _____	
Contact Information	By mail: please write the postal address: _____ _____
Please indicate your preferred method of communication (by mail, by phone, by e-mail)	By phone: _____ By email: _____
Confidential Yes/No	
Complaint submitted (underline as appropriate): in person, by phone, during a meeting, by e-mail, other (please specify how the complaint is submitted) _____	
Description of the request, incident or complaint:	What happened? Where did the incident occur? Who did the incident happen to? What is the problem?
Date of request/incident/complaint	
	Single case (date _____)The case was repeated several times (how many times? _____)Persistent problem (available today)
How can the problem be solved?	
Signature: _____	Date: _____
Please return the completed form: Director of Ushtogan LLP, +7 (727) 272 31 63, irma@sarytogangraphite.com, 050000, Republic of Kazakhstan, Almaty, 158 Panfilov Street, office 1 We will register your complaint and provide you with a response within 25 working days, *optional/not necessary - if the complaint is registered as anonymous, no response will be provided.	

Annex 2: Applicable Legislation and Requirements

The EBRD adheres to its Environmental and Social Policy (2014), as well as the Public Information Principles (EBRD Policy 2014) and imposes a number of requirements on its clients regarding stakeholder engagement activities.

The EBRD's requirements for stakeholder engagement and disclosure for Category A projects are presented in the EBRD Project Implementation Requirements (TR) 1: Environmental and Social Impact Assessment and Management and TR 10: Disclosure and Stakeholder Engagement.

- a) As required by the 2014 EBRD Policy, the process of project sponsors' engagement with stakeholders should begin early in the development of the project and continue throughout the life of the project. Interaction with stakeholders should be open, meaningful and should be conducted in a manner acceptable to the potentially affected population. The interaction program should be aimed at meeting the needs of vulnerable groups of the population that may be affected by the project. ESIA documents should remain publicly available for the duration of the project. Necessary changes to the project plans should also be made public.
- b) The 1998 Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention) guarantees the right of access to information, public participation in decision-making and access to justice in environmental matters for the protection of the human right to a favorable environment. The Republic of Kazakhstan acceded to (ratified) the Aarhus Convention in 2000, so this legislative requirement must be observed.
- c) This project is being implemented taking into account the requirements of the national legislation of the Republic of Kazakhstan, which regulates access to information, public participation in the decision-making process, as well as environmental and urban planning expertise. The application of these norms ensures transparency, accountability and participation of all stakeholders throughout the project life cycle.

Key legislation governing access to information and public participation:

1. The Law of the Republic of Kazakhstan "On Access to Information" (dated November 16, 2015 No 401-V ZRK) Establishes the basis for free and unhindered receipt of information from state bodies and organizations of the quasi-public sector. Guarantees the right of citizens to receive, store, disseminate and use information.
2. The Environmental Code of the Republic of Kazakhstan (dated January 2, 2021) Regulates the process of environmental impact assessment (EIA) and the conduct of public hearings. The Code defines the right of every citizen and organizations to access environmental information, including:
 - o data on the current state of the environment;

- information about the planned economic activity and its consequences;
 - information on the results of environmental examinations;
 - the opportunity to participate in the discussion of projects and provide comments.
3. The Law of the Republic of Kazakhstan "On Architectural, Urban Planning and Construction Activities" (dated July 16, 2001 No 242-II) enshrines the right of citizens to participate in the development and consideration of urban planning documents. It requires openness and transparency in the processes of planning, design and placement of facilities, including through public hearings.
 4. The Land Code of the Republic of Kazakhstan (dated June 20, 2003 No 442-II) Obliges state bodies to inform the public about the seizure and provision of land plots for the placement of objects affecting the interests of the population. Public participation is carried out through notifications, hearings and publications.
 5. The Law of the Republic of Kazakhstan "On Public Services" (dated April 15, 2013 No 88-V) Ensures transparency and accountability in the provision of permits and approvals, including in the field of ecology and urban planning. Obliges to publish information on public services and the results of consideration of applications.
 6. The Law of the Republic of Kazakhstan "On Mass Media" (dated July 23, 1999 No. 451-I) Confirms the right of the media to access information from state bodies, including information on the environment, sanitary situation, project documentation and other information of public interest.
 7. The Constitution of the Republic of Kazakhstan (adopted on August 30, 1995) Guarantees:
 - the right of everyone to receive and disseminate information;
 - the right to a favorable environment and reliable information about its condition.

The application of these norms and standards will be ensured within the framework of the implementation of this project, and interaction with stakeholders will be in accordance with both national and international law.