**Guidelines on Health, Safety and Environment Management System in the JSC NC “KazMunayGas” Group of Companies**

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**1. PURPOSE**

These Guidelines on Health, Safety and Environment Management System in the JSC NC “KazMunayGas” Group of Companies (hereinafter - Guidelines) was developed subject to Legal requirements, requirements of ISO 14 001, ISO/DIN 45 001:2018 [5.1., 5.2.] international standards, The KMG Development Strategy [5.3.], JSC NC “KazMunayGas” Integrated Control System Manual (Version 11) [5.4.], The Reference Model for Process Safety Management for JSC “Samruk-Kazyna” Portfolio Companies [5.5.], The Reference Model for Sustainable Development of JSC “Samruk-Kazyna” Portfolio Companies [5.6.], recommendations on best practices of IPECA/IOGP international associations of oil and gas industry and is the corporate standard of KMG.

The purpose of these Guidelines is to ensure HSE management in the KMG Group of Companies to achieve the objectives of the Strategy and Policy, including:

1. definition of the HSE MS Elements and their interaction;
2. providing the KMG Management, Heads of business areas/divisions, Heads of business lines, chief executives of the KMG Group of Companies, Line Managers and Employees with the opportunity to integrate the HSE MS in business processes and the Corporate Culture;
3. definition of requirements for HSE in the KMG Group of Companies, as well as Stakeholders’ requirements for impact on the Facilities of the KMG Group of Companies;
4. promoting employees of the KMG Group of Companies and Contractors/Outsourcing in performance of their actions to ensure HSE MS implementation and application of internal documents in the field of KMG HSE;
5. increasing awareness of employees of the KMG Group of Companies, Contractors/Outsourcing and Stakeholders in the field of HSE towards the HSE MS.

Critical for the HSE MS is the Management of Risks associated with Incidents/Environment Pollution, which includes corresponding control means, methods and tools at all organization levels of the KMG Group of Companies.

The HSE MS acts in accordance with the Code of Business Conduct of JSC NC “KazMunayGas”, the Corporate Governance Code, the Code of Corporate Social Responsibility of JSC NC “KazMunayGas”, the Corporate Code of Conduct of JSC NC “KazMunayGas” in the field of health and safety – “Golden Rules” [5.7., 5.8., 5.9., 5.10.], and other internal documents of KMG.

**2. ORGANIZATION CONTEXT**

**2.1. Understanding the Organization and its Context**

KMG is the national operator for exploration, production, refining and transportation of hydrocarbons, represents the interests of the state in the oil and gas industry of the Republic of Kazakhstan. The KMG Group of Companies, founded in 2002, includes 140 SDEs with more than 85,000 employees. The founder of KMG is the Government of the Republic of Kazakhstan represented by the State Property and Privatization Committee of the Ministry of Finance of the Republic of Kazakhstan. The KMG shareholders are Joint-Stock Company “Sovereign Wealth Fund “Samruk-Kazyna” (90%) and the National Bank of the Republic of Kazakhstan (10%). KMG owns interests in large oil and gas projects (Tengiz, Kashagan, Karachaganak).

The facilities of the KMG Group of Companies are located almost in all regions of Kazakhstan, which have different specifics of production and economic activities, complexity of the work performed and the degree of Risk.

The Development Strategy defines common strategic objectives, as well as the main internal and external factors that may affect the activities of the KMG Group of Companies.

In accordance with the Strategy, KMG aims to ensure a high level of HSE in accordance with the world standards. Since 2018, KMG has been a full member of the IOGP and is seeking to enter the top quartile of international oil and gas companies that are part of the IOGP in terms of HSE.

KMG views itself as a guide for information exchange and transfer of innovations and technologies in the field of HSE in the oil and gas industry of Kazakhstan for KMG sustainable development, through:

1) joining the expanded and global partnership, which provides an opportunity to interact with international experts, companies and organizations of the oil and gas industry;

2) objective benchmarking of the results in the field of HSE compared to the best global majors and the average statistics of the oil and gas industry;

3) participation in committees and working groups and access to best practices, techniques and expertise;

4) involvement in the industry mentoring program and the development of new methods and rules based on best practices;

5) participation in international forums, seminars and exhibitions on HSE issues in the oil and gas industry;

6) working with a number of industry partners/competitors of IOGP members to increase the total performance;

7) increasing the degree of recognition and trust, because IOGP’s guidance is recognized by the Authorized Bodies and Stakeholders as a serious recommendation;

8) gaining access to technical data for development and improvement of the KMG corporate documents in the field of HSE;

9) obtaining information about new changes and risks in the oil and gas industry.

**2.2. Understanding Stakeholders’ Needs and Expectations**

In order to obtain a common understanding of the needs and expectations of Stakeholders, such as shareholders, investors, customers, partners, local communities, public organizations, Employees and Trade Unions, Contractors/Outsourcing, population, state bodies and financial institutions, KMG identifies and takes into account mandatory requirements, needs and expectations of the Stakeholders, the extent of their influence in accordance with the KMG Stakeholder Map [5.11.].

KMG identified key internal and external factors that may affect the results of the HSE MS or be influenced by the KMG Group of Companies.

The most important factors that affect the ability to receive the expected results of HSE MS are:

1. internal (KMG Group of Companies, Strategy and Policy, Opportunities and Resources, information systems and decision-making systems, contractual and partnership relations, Corporate Culture);
2. external (social, cultural, economic, legal requirements and Environmental Aspects at the local, regional, national or international level, relations with the Stakeholders);
3. environmental aspects related to climate change, air quality, soil and water, historical and current pollution, biodiversity, specially protected natural areas that may influence or be influenced by the KMG Group of Companies.

All of the above factors are taken into account when assessing the environmental impact, environmental studies (background, environmental monitoring) when implementing projects of the KMG Group of Companies, as well as when preparing and publishing the KMG Sustainability Report [5.12.].

**3. SCOPE**

These Guidelines apply to the organizations of the KMG Group of Companies and is mandatory for execution by all Employees of the KMG Group of Companies, including:

1) Facilities;

2) Processes and Procedures;

3) works, services and products.

4) Employees.

The KMG Group of Companies develops and supports Processes, and ensures that the HSE MS requirements are met by the Contractors/Outsourcing Employees and are under their management.

The HSE MS takes into account the Product Life Cycle, in the area of ​​control or influence of the KMG Group of Companies at all stages of the production cycle, starting from design and construction, including exploration and production, transportation and refining, to product delivery (oil, gas, fuel types and electric power). Products delivered to third parties cannot be controlled due to the product nature.

**4. DEFINITIONS AND ABBREVIATIONS**

The following definitions and abbreviations are used in these Guidelines:

|  |  |
| --- | --- |
| **KMG** | Joint-Stock Company “National Company “KazMunayGas” |
| **KMG Group of Companies** | KMG and legal entities where fifty or more percent of the voting shares (participatory interests) directly or indirectly belong to KMG on the right of ownership or trust management, as well as legal entities whose activities are subject to control by KMG  |
| **Audit** | A systematic, independent and documented process for obtaining an audit evidence and its objective assessment in order to determine the degree of compliance with the audit criteria  |
| **Outsourcing** | Conclusion of an agreement with an individual or a legal entity, according to which a part of the functions or process of the KMG Group of Companies is transferred for performance  |
| **HS** | Health and safety |
| **Internal Incident Investigation** (for the purposes of this document) | Identification of Incident root causes in the KMG Group of Companies, as well as their analysis  |
| **Opportunities** | A state or a set of circumstances that may lead to improved HSE performance  |
| **Documented information**  | Information on HSE which requires to be managed and maintained in proper working order, and a media containing it. The documented HSE information includes the Policy and Manual, internal regulatory documents, Procedures and technical regulations  |
| **Other requirements** | Stakeholder requirements, accepted by the KMG Group of Companies as mandatory, which may be in the form of agreements with public authorities and public organizations, voluntary codes of conduct, standards and voluntary commitments under international initiatives, etc.  |
| **Life cycle** | Consistent and interrelated stages of output of products, works and services from raw material acquisition or extraction from natural resources to final disposal  |
| **Environment pollution** | Ingress of pollutants, radioactive materials, production and consumption wastes into the environment, as well as impact of noise, vibration, magnetic fields and other harmful physical impacts on the environment  |
| **Stakeholder** | Individuals and legal entities that may influence activity implementation or decision-making, or whose interests are affected by an activity  |
|  **Lagging indicator** | An indicator for assessing the extent and actual consequences in the Risk Management System, reflecting one or more obstacles (barriers) simultaneously  |
| **KPI** | Indicators that characterize the organization's performance level, allowing to assess the organization's activities as a whole, as well as the employees’ performance  |
| **Corporate culture** | A system that incorporates the values, beliefs and principles that serve as the basis for the HSE MS, and the set of modes of action and behavior that embody and strengthen these basic principles  |
| **CDMS** | The corporate data management system for labor and environmental protection, industrial and fire safety, emergency prevention of JSC NC “KazMunayGas”, operating online at the corporate portal [www.kisud.kmg.kz](http://www.kisud.kmg.kz)  |
| **Committee** | A committee for KMG HSE/Group of Companies’ Organization  |
| **Corrective action** | An action aimed at eliminating the cause of the inconsistency |
| **Crisis situation** (for the purposes of this document) | A situation (accident or emergency), the consequences of which can affect the KMG profitability, its reputation or feasibilities for further activities.  |
| **Line managers** | Heads and specialists of the organization of the KMG Group of Companies, who directly manage work production (CEO-3)  |
| **Nonconformity** | Failure to comply with the established requirements (any decisions, documents, management decisions, etc. that do not comply with Legal Requirements, requirements of the KMG's regulatory and internal documents, obligations accepted in KMG)  |
| **Accident** | Impact on an employee of a harmful and (or) dangerous production factor when performing his work (job) duties or tasks of the employer, which resulted in an industrial injury, sudden deterioration of health or poisoning of an employee, which led him to temporary or persistent disability or death  |
| **Legal requirements** | Requirements contained in regulatory legal acts, regulatory documents, including international conventions, standards, international and interstate agreements and contracts of the Republic of Kazakhstan  |
| **Facility** | Buildings, structures, premises, technological equipment and installations for oil refining, drilling rigs and drilling equipment, gas and oil pump stations and pipelines, tank farms, engineering structures and landfills, other technical devices, vehicles and special equipment used in production activities and located in the territories (contract territories) of the KMG Group of Companies’ organizations  |
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| **Danger (dangerous factors)** |

 | An element of activity (operation, process, products, equipment, services, etc.) that may damage health of people and property of the KMG Group of Companies  |
| **Hazard identification** | The process of recognizing the existence of a hazard and determining its characteristics |
| **Operational control** | Measures or activities aimed at management (monitoring, preventive measures and reduction) of significant aspects and risks  |
| **Leading indicator** | An indicator for assessing the extent and actual consequences in the Risk Management System, reflecting performance in maintaining the Risk Management System  |
| **HSE** | Activities in the field of labor protection, industrial safety and environmental protection, which include such areas as: occupational safety and health and safety of workers, industrial, fire and transport safety, emergency situations, compliance management, environmental protection (emission management , discharges and wastes), rational use of natural resources (water, flora and fauna, energy efficiency)  |
| **Responsible structural division of KMG** | A structural division of KMG, responsible for direction of activities in the field of HSE |
| **Risk assessment** | Determination of a quantitative and/or qualitative indicator of the identified risk by assessing the likelihood of its occurrence and possible damage to KMG  |
| **BOS (BOSO/BOSD)** | Behavioral observation for safety (behavioral observation for safe operation/ behavioral observation for safe driving)  |
| **Contracting organization (contractor)** | An individual or legal entity who performs certain work/renders services at the Facility/Workplace under an agreement concluded with the organization of the KMG Group of Companies in accordance with the agreed requirements, terms and conditions  |
| **Policy** (for the purposes of this document) | A statement on directions and intentions of development, principles and priorities of KMG/Company activities in the field of HSE |
| **Continuous improvement** | A part of systems management to achieve the set goals. The concept of “continuous improvement” refers both to results that are incremented gradually, and to results of a “breakthrough” type. It is an everyday activity to identify bottlenecks, identify problems and find opportunities to improve operations, optimize processes and eliminate potential threats and risks  |
| **Preliminary discussion** | A process by which the KMG Group of Companies identifies opinions of employees before taking a decision or action  |
| **Preventive actions** | A measure aimed at eliminating the potential cause of non-compliance  |
| **Incident** (for the purposes of this document) | Any unplanned event that has occurred as a result of or in the process of production activities of the organization of the KMG Group of Companies that resulted in, or could lead to, a work-related accident, to a fire, explosion, accident, traffic accident or any other event having an impact on the business and the reputation of the KMG Group of Companies  |
| **Process** | A set of interrelated and (or) interacting activities that use inputs to obtain the intended result  |
| **Procedure** | An internal document that determines the procedure for implementation of a process by structural divisions of one or more functional units within the same business area  |
| **Employee** | An individual who is in employment relationship with the organization of the KMG Group of Companies and performs work under an employment contract  |
| **Workplace** | A place of permanent or temporary location of an employee when performing his work duties in the course of employment |
| **Resources** | Human, financial and material resources, necessary for proper maintenance and operation of the HSE MS  |
| **Risk** | A possibility of an adverse event that negatively affects: within the quality management system - an ability to provide adequate quality, in the field of risk management - an ability to successfully achieve strategic objectives, within the health and safety management system - on the health of KMG employees  |
| **Management (executives) of KMG** | The Chairman and members of the Board |
| **Head of business-line/Division** | Deputy Chairman of the Board, who heads the corresponding Division: Exploration and Production of Raw Hydrocarbon, Service Infrastructure of Production Assets, Gas Transportation and Marketing, Oil Transportation, Refining and Petrochemicals, Marketing and Sales (CEO-1)  |
| **Head of activity area** | Deputy Chairman of the Board - Financial Director/ Managing Directors/ Head of a structural direction, who heads the corresponding activity area: Economics and Finance, Strategy, Human Resource Management, Corporate Safety, Labor and Environmental Protection, Legal Assurance, Risk Management, Transformation (CEO-1)  |
| **Development Strategy** | A long-term strategic planning document containing a statement on the Mission, Vision, Strategic Objective, Strategic Development Priorities, Strategic KPIs and Strategic Initiatives of the Company  |
| **HSE service** | A structural division of the KMG Group of Companies’ organization responsible for the business line in the field of HSE, if it is absent, a specialist who coordinates the activities of the structural divisions of the KMG Group of Companies in the field of HSE  |
| **HSE MS** | A part of the KMG management system, used to develop and implement the Policy and Risk Management in the field of HSE  |
| **Requirement** | The need or expectation that is established, is usually assumed or is mandatory  |
| **GWS** | Goods, works and services |
| **Fund** | Joint-Stock Comapny “Sovereign Wealth Fund “Samruk-Kazyna" |
| **Authorized bodies** | Central executive bodies, which provide management and cross-sectoral coordination in the field of HSE and its territorial bodies  |
| **Process Safety Management** | Application of the management and control system (programs, procedures, audits, assessments) of the production process in such a way as to identify, understand and monitor technological hazards to prevent Incidents/Environmental Pollution associated with the process  |
| **Management of risks** | The process of making and executing management decisions in the field of HSE aimed at reducing the probability of occurrence of an Incident/Accident/Environmental Pollution, minimizing the possible consequences caused by its implementation  |
| **Management of Change** | The process of managing planned changes (temporary or permanent) that affect the HSE MS indicators, such as changes in Legal Requirements, production processes, Procedures, equipment and technologies, organizational structure, products and services, knowledge or information about Hazards and associated Risks in the field of HSE |
| **Objectives** | Objectives in respect of the planned KMG indicators in the field of HSE. Objectives shall be quantified, as far as possible, in order to ensure that it is possible to perform audit, evaluation and analysis of results  |
| **Emergency situation (ES)** | A situation in a certain territory, which arose as a result of an accident, disaster or catastrophe that caused or could lead to the death of people, damage to their health, the environment and business entities, significant material losses and violation of living conditions of the population  |
| **Ecological aspect (factor)** | An element of activity (operation, technological process, services, products, etc.) that can affect the environment  |
| **Environmental audit** | Independent audit of economic and other activities of audited entities aimed at identifying and assessing environmental risks and developing recommendations for improving the level of environmental safety of their activities  |
| **Environmental impact** | Changes in the environment, whether negative or favorable, wholly or partly arising from environmental aspects  |
| **Elements** | Elements of the HSE MS defining the organization of the KMG Group of Companies, roles and responsibilities, planning and operation, assessment of indicators and improvement  |
| **International Association of Oil & Gas Producers (IOGP)** | International Association of Oil & Gas Producers |
| **International Petroleum Industry Environmental Conservation Association (IPIECA)** | International Petroleum Industry Environmental Conservation Association |

**5. REFERENCES**

5.1. ISO 14001 Environmental Management Systems - Requirements with Guidance for Use.

5.2. ISO/DIS 45001 Occupational Health and Safety Management Systems — Requirements with Guidance for Use.

5.3. The KMG Development Strategy.

5.4. JSC NC “KazMunayGas” Integrated Management System Manual (Version 11).

5.5. The Reference Model for Occupational Safety Management for JSC “Samruk-Kazyna” Portfolio Companies.

5.6. The Reference Model for Sustainable Development of JSC “Samruk-Kazyna” Portfolio Companies.

5.7. The Code of Business Conduct of JSC NC “KazMunayGas”.

5.8. The Code of Corporate Governance of the JSC “Samruk-Kazyna” Group of Companies.

5.9. The Code of Corporate Social Responsibility of JSC NC “KazMunayGas”.

5.10. The Corporate Code of Conduct of JSC NC “KazMunayGas” in the field of health and safety – “Golden Rules”.

5.11. JSC NC “KazMunayGas” Stakeholder Map.

5.12. JSC NC “KazMunayGas” Reports in the Field of Sustainable Development.

**6. FUNDAMENTAL PRINCIPLES**

Fundamental principles of management are basic for the effectiveness of the HSE MS that determine how the KMG Group of Companies creates and maintains the HSE MS and promotes its strengthening and integrity (Fig. 1).

The fundamental principles focus on Management Processes that are important for an effective HSE MS: Goal Achievement, Leadership, Risk Management and Continuous Improvement.

These fundamental principles are not consistent, but they are equally applicable to each Element, which contributes to success achievement. Constant attention to each of the fundamental principles helps to support the HSE MS increasing productivity and efficiency. Ten Elements create a structure for the organization of various components of the HSE MS. Each of the ten Elements includes Purpose, Requirements and Documented Information.



Figure 1. The Structure of the HSE MS - 4 Fundamental Principles Underlie 10 Elements:

Elements

1. Leadership, Obligations and Responsibility
2. Policy, Objectives and Programs
3. Organization, Resources and Opportunities
4. Contractors and Stakeholders
5. Risk Management
6. Asset Design and Integrity
7. Implementation and Safe Operation
8. Reporting and Incident Investigation
9. Monitoring, Measurement and Analysis
10. validation and Improvement Measures

Goal Achievement

Leadership

Risk Management

Continuous Improvement

**6.1. Goal Achievement: “Implementation”**

Effective implementation is essential for the success of the HSE MS and shall lead to Continuous Improvement. For this, the HSE MS shall be centralized and implemented throughout the KMG Group of Companies, both for strategic planning and for daily work, so that risk assessment and control measures are consistently applied.

Personal obligations and accountability are crucial for successful implementation. The management of KMG has a common responsibility, but delegates a clear order of accountability and scope of authority to ensure that each part of the HSE MS has the owner of the Process. This cascading will lead to further delegation of the sublevels of the HSE MS including Processes and Procedures.

**6.2. Leadership: “Constantly Monitor the HSE MS** **Effectiveness”**

Targeted implementation of KMG's Strategy and Policy, support of the HSE MS shall be initiated from the top down. The KMG management provides each level of management of the KMG Group of Companies with the necessary authorities and resources for implementing the HSE MS. Roles and responsibilities shall be identified and cascaded in the KMG Group of Companies.

The KMG management, Heads of business-lines/Divisions, Heads of activity areas, CEOs of KMG Group of Companies’ organizations, Line Managers demonstrate honesty, openness, fulfill their obligations, and contribute to the creation of the environment in which the KMG Group of Companies employees can openly provide back communication. Each employee of the KMG Group of Companies, who participates in the HSE process, shall understand his/her responsibility to ensure the HSE MS effectiveness and to see the opportunities for demonstrating his/her leadership skills. The HSE MS effectiveness depends to a large extent on the leaders of all levels of the KMG Group of Companies, who are role models, devoting their time and efforts to achieving the Goals.

**6.3. Risk management: “Overcoming Barriers, Strengthening Positive Results”**

Risk management is an integral part of the KMG Group of Companies’ Processes and is of paramount importance for decision-making under the HSE MS in order to protect the interests of the KMG Group of Companies and achieve results.

A general approach to risk management begins with consideration of both external and internal factors. External factors include social, cultural, economic, legislative requirements and environmental aspects at the local, regional, national or international levels. Their impact on the KMG objectives and its relationship with the Stakeholders is also determined. Internal factors include the organization and management of the KMG Group of Companies, its Policy and Objectives, Opportunities and Resources, information systems and decision-making systems, contractual and partnership relations and Corporate Culture.

In order to improve the Corporate Culture and awareness of Employees, Contractors / Outsourcing, visitors and Stakeholders in the part of Hazards and Risks, KMG has developed a Corporate Code of Conduct of JSC “National Company “KazMunayGas” in the field of labor health and safety and labor - ”Golden Rules”, which are intended and mandatory for execution by all employees of the KMG Group of Companies.

The ”Golden Rules” of KMG contain key requirements for the safe performance of works at Facilities / Workplaces, developed on the basis of an analysis of the incidents that occurred in the KMG Group of Companies and international practices such as:

1) be ready to work;

2) safety while driving;

3) work permit for production of works of increased danger;

4)isolation of energy sources;

5) work in a confined space;

6) work at height;

7) moving and energized equipment;

8) lifting operations.

**6.4. Continuous Improvement: “Always Plan-Do-Check-Act”**

The concept of achieving Continuous Improvement through a continuous cycle of successive steps: Planning - Implementation - Control - Action is the basis for the HSE MS (Fig. 2).

The cycle begins with careful planning, followed by a controlled execution with an efficiency check. All this leads to actions for improvement in subsequent planning of a continuous cycle. The cycle is consistently applied to continuous improvement of the HSE MS and any of its Elements, or for a single working procedure, and underlies the implementation.

The cycle protects against manifestations of negligence. It is often possible to focus on the Planning-Execution stages and assume that the cycle is almost complete. This excessive confidence can lead to insufficient concentration of attention in equally important stages as Control-Action, which guarantee Continuous Improvement.

1) Leadership and Politics. The cycle success depends on commitment of the KMG Management, Heads of business-lines/Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies, Line Managers who need to integrate the cycle into their current operating mode and demonstrate by their example how the cycle is applied. The policy is an official statement of the KMG Management on the main intentions and activities that defines the framework for action and serves as the basis for setting the Objectives.

2) Planning. Determination of the structure, responsibility and authority in the KMG Group of Companies. Identification and Assessment of Risks and Opportunities, identification of KMG HSE Objectives, programs and initiatives, and improvement of performance of the KMG Group of Companies.

3) Assurance and Functioning. Implementation of plans and programs, improvement of training, competence, communication and awareness, methods and means of control, control systems of Documented Information.

4)PerformanceAssessment. Monitoring and measuring the Processes in relation to implementation of the Policy, including the obligations contained therein, the Goals and performance criteria, and reporting on the results.

5) Continuous Improvement. Analysis and assessment by the KMG Management of conformity, adequacy and effect of the HSE MS operating and improvement measures.

**Organization Context**

Потребности ожидания заинтересованных сторон

Internal and external factors

Потребности ожидания заинтересованных сторон

Needs and expectations of stakeholders

HSE MS Scope

**PLANNING**

**PERFORMANCE ASSESSMENT**

**ASSURANCE AND FUNCTIONING**

**LEADERSHIP AND POLITICS**

**CONTINUOUS IMPROVEMENT**

**HSE MS Expected Results**

Figure 2. Planning-Implementation-Control-Action Methodology

**7. LEADERSHIP, OBLIGATIONS AND RESPONSIBILITY (ELEMENT 1)**

The purpose of the Element - the management of KMG understands its responsibility and demonstrates its leadership and commitment to the KMG Group of Companies and the Policy through the obvious and effective management of HSE.

KMG strives to ensure that the Heads of business-lines/ Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies, Line Managers demonstrate leadership qualities and adherence to the principles of HSE and the HSE MS, clearly distribute roles, responsibilities and duties, provided the necessary Resources for implementation of the Strategy and Policy in the field of HSE.

**7.1. Leadership and Obligations**

The Heads of business-lines/ Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies, Line Managers demonstrate by their personal example the visible participation and commitment, ensure implementation and continuous improvement of the HSE MS through:

1) admission of a general responsibility for health protection, HS of Employees;

2) ensuring that the Policy and related Objectives are established in the field of HSE and are consistent with the Strategy;

3) promotion to the Corporate Culture that supports the key Goal in the field of HSE - a complete absence of Incidents / Pollution of the environment;

4) identification of the Environmental Aspects within the HSE MS, and environmental protection, ensuring consistent improvement and prevention of environmental pollution;

5) ensuring the integration of the processes and requirements of the HSE MS in the business processes of the KMG Group of Companies;

6) ensuring that the HSE MS achieves the intended results;

7) ensuring active participation of Employees and/or Employees’ representatives using the Preliminary Discussion, as well as identification and elimination of obstacles and barriers to participation;

8) forming and encouraging the positive attitude of Employees to the issues of HSE;

9) provision of sufficient Resources for the safe and efficient performance of works and maintenance of the HSE MS system;

10) determining and documenting the roles, responsibilities and duties, authorities and bring them to the attention of relevant Employees through the development of job descriptions;

11) coordination of activities related to development, implementation, operation and periodic analysis of the HSE MS by the Committee;

12) ensuring the responsibility of each Employee for the HSE issues during the work process by conducting periodic inspections of the work performed.

The Heads of business-lines/ Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies, Line Managers provide bilateral exchange of information on HSE issues with Employees, Contractors/Outsourcing, who supply/perform/render GWS at Facilities, including:

1) cascade policies and actively stimulate their implementation and execution;

2) start each meeting, held on a regular basis, from the HSE issues;

3) egularly visit the Workplace, monitor compliance with the HSE requirements by Employees and openly discuss the HSE issues with them;

4) increase their skills and knowledge in the field of HSE during training and practical work;

5) promote the extension and assimilation of the experience gained by them in the field of HSE, both inside the structural divisions headed by them and outside;

6) have their own personal plan for HSE.

The efficiency management system was implemented and operates in the KMG Group of Companies through KPIs (corporate and functional) for HSE for managing employees, which aims to improve performance in HSE.

The Heads of business-lines/ Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies take an active part in annual forums and meetings on HSE issues (Forum of General Directors of SDEs “Leadership in HSE” with the participation of the members of the Board and the Board of Directors of KMG), thereby demonstrating support and commitment to HSE issues.

With the assistance of the Samruk-Kazyna Corporate University, KMG is implementing a training program in the field of HS and a positive safety culture for CEOs, line managers, managers and specialists of the Services of the KMG Group of Companies’ organizations in the safe labor leaders’ academy - HSE Business Academy.

KMG initiated a competition for innovations in the field of HSE in the KMG Group of Companies in accordance with the Rules on the procedure and conditions for holding the annual competition of the Chairman of the Board of JSC NC “KazMunayGas” “Best Innovative Ideas and Practices in Health, Safety and Environment of the JSC NC “KazMunayGas” Group of Companies” (KMG-PR-2191.2-13).

**7.2. Responsibility**

The KMG management, Heads of business-lines/ Divisions, Heads of activity areas, CEOs of the organizations of the KMG Group of Companies are responsible for ensuring the operation of the HSE MS.

The Managing Director for Safety and Environment of KMG is the representative of the KMG's Management for the HSE MS and is responsible for HSE issues in the KMG Group of Companies and controls the provision of:

1) compliance with the requirements of the HSE MS, which are established, applied and maintained in accordance with the requirements of ISO 14 001 and ISO/DIN 45 001;

2) informing the Board of Directors of KMG on the operation of t the HSE MS S, including recommendations for improvement;

3) informing the Employees of the KMG Group of Companies of the expectation of the Stakeholders in the field of HSE;

4) development and implementation of key HSE indicators to monitor the results and ensure that this information is communicated to each employee of the KMG Group of Companies.

Each Employee of the KMG Group of Companies within its authority is personally responsible for HSE. Roles and responsibilities for HSE are specified in internal documents and job descriptions of Employees.

**8. POLICY, OBJECTIVES AND PROGRAMS (ELEMENT 2)**

The purpose of the Element is to inform all Employees, Contractors/Outsourcing and Stakeholders that HSE is an important part of all KMG Group of Companies’ business processes.

**8.1. Policy and Objectives**

The management of KMG approved and put into effect and is responsible for implementation of the Policy in the Field of Health, Safety and Environment of JSC NC “KazMunayGas”, Policy in the Field of Safe Operation of Land Vehicles of JSC NC “KazMunayGas”, Policy for Alcohol, Narcotic Drugs, Psychotropics and their Analogues of JSC NC “KazMunayGas”, Policy on the Corporate Risk Management System of JSC NC “KazMunayGas” and its subsidiary and dependent entities, Policy of Interaction of JSC NC “KazMunayGas” and its Subsidiary and Dependent Entities within the Divisional Management System.

Policies are communicated to all Employees, Contractors/Outsourcing who supply/perform/render GWS at the KMG Group of Companies’ Facilities in order to familiarize them with the obligations in the field of HSE.

The policies are posted on the intranet portal and on the external corporate site of KMG www.kmg.kz. The policies are provided to the Stakeholders upon request.

Objectives in the field of HSE are reviewed (if necessary) and established by the KMG Management on the basis of the Strategy. When determining the objectives, the following are taken into account:

1. Legal and other requirements in the field of HSE;
2. results of Risk Assessment and significant Environmental Aspects;
3. other policies and objectives of KMG relating to business in general;
4. views of the Stakeholders;
5. Opportunities for Continuous Improvement;
6. available technological alternatives and financial, production and business requirements;
7. any changes related to changes in works, products, services or production conditions in the KMG Group of Companies.

When setting Objectives in the field of HSE, they are measurable (if possible).

Objectives in the field of HSE are incorporated into the corporate and functional efficiency of the Management Team of the KMG Group of Companies for their achievement, which are approved by the decision of the KMG Board of Directors.

**8.2. Programs**

To implement the Policy and achieve the goals set, a roadmap for improving the state of health, safety and environment in the group of companies of JSC NC “KazMunayGas” - 2020 was developed and is being implemented.

To implement it, an annual activity plan in the field of HSE is developed, which includes:

1. directions of development of HSE (HSE MS, Safety and Labor Protection, Health and Safety, Industrial Safety and Emergency Situations, Transport Safety, Environmental Protection, Energy Efficiency and Sustainable Development);
2. HSE improvement programs and initiatives (Policies and internal regulatory documents, Risk Management, Developing a culture of employees’ safety behavior, Health promotion in the workplace, Asset Integrity Management, Safety System for operation of land vehicles, Reducing impact on the environment, Improving energy efficiency, Enhancing sustainable development);
3. key measurable indicators in the field of HSE and terms of their execution.

**9. ORGANIZATION, RESOURCES AND OPPORTUNITIES (ELEMENT 3)**

The purpose of the Element - Employees, Contractors/Outsourcing and Stakeholders are aware of Legal and Other Requirements, Hazards, Risks and Risk Management in the field of HSE, are competent to conduct their activities and behave responsibly. Skills and competencies are regularly assessed.

The process of training and maintaining the competence of Employees is conducted in order to ensure an appropriate level of competence in the field of HSE, training and awareness of Employees of the KMG Group of Companies and Contractors / Outsourcing in respect of Risks, Environmental Aspects and HSE.

**9.1.** Competence, Training and Awareness

KMG provides and enhances the competence of the employees of the KMG Group of Companies in order to create and maintain the required skill level of the Employees to fulfill the objectives of the HSE Strategy and Policy in accordance with the Training and Development Policy for the employees of JSC NC “KazMunayGas” (KMG-PR- (KMG-PR-1152.4-6) and the Rules for attestation of administrative and managerial employees of JSC NC “KazMunayGas” (KMG-PR-2412.1-6), by means of:

1) determining the required level of competence for Employees whose activities are related to Risks and Environmental Aspects, and HSE, including requirements for education, training, personal abilities, skills and experience. Requirements for competence are established in the job descriptions of organizations of the KMG Group of Companies;

2) determining the need for training in HSE;

3) approval of the training schedule;

4) organization and monitoring of the learning process;

5) assessing performance of the training held;

6) development and implementation of appropriate programs for HSE training in order to achieve and maintain the required level of competence;

7) receiving feedback from Employees in assessing the quality of the training they have completed on the basis of the questionnaire;

4) periodic evaluation of competence in order to confirm the ability of Employees to perform their duties (testing knowledge in the field of HSE in accordance with Legal Requirements.

5) analysis of competence requirements for changes in technology and work.

Planning of training and raising the level of knowledge in the field of HSE, Employees of the KMG Group of Companies is provided for by the budget planning of KMG in accordance with the Rules for Formation, Approval, Adjustment and Monitoring of the Development Plan (Separate) of JSC NC “KazMunayGas” (KMG-PR-150.10-24 ), The Rules for Development, Approval, Approval and Monitoring of the Consolidated Development Plan of JSC NC “KazMunayGas” (KMG-PR-1054.3-24) and the Rules for Development, Alignment, Approval, Adjustment and Monitoring of Business Plans of Subsidiaries, Dependent Entities and Joint Ventures of JSC NC “KazMunayGas” (KMG-PR-84.8-24).

The KMG Group of Companies conducts the following types of training in HSE:

1) compulsory training courses for HSE in accordance with the Legal Requirements;

2) training courses for HSE in accordance with the calendar plans.

The following types of briefings on HSE are held in the organizations of the KMG Group of Companies:

1) introductory briefing in accordance with the program of introductory briefing on HSE, including the Introductory Safety and Labor Protection Program for Employees of JSC NC “KazMunayGas” (KMG-RI-195.2-13).

2) initial briefing at the workplace is conducted in accordance with the program of initial briefing at the Workplace of each Facility (where applicable);

3) repeated instruction at the workplace is carried out according to the program of initial briefing at the Workplace in full, at least once every six months;

4) unscheduled briefing is conducted individually or with a group of Workers of the same profession. The scope and content of briefing is determined in each specific case, depending on the reasons and circumstances that necessitated its conduct;

5) targeted briefing is carried out when performing works for which a work permit is required, in case of one-time works not related to direct duties in the specialty (loading, unloading, cleaning the territory, occasional work outside the organization, workshops and sections), during liquidation of consequences of accidents, natural disasters and accidents.

In order to monitor the effectiveness of training in KMG, methods for monitoring training were developed, which include:

1) evaluation of the quality of the training conducted (for example, monitoring the learning process, assessing the quality of training programs and handouts, evaluating external and internal trainers, using questionnaires, screening tests, analyzing and evaluating test results);

2) observation and evaluation of the work at the end of training;

3) analysis of Incidents//Pollution of the environment, when insufficient training is the main reason.

The management of the KMG Group of Companies, first managers of the KMG Group of Companies, Line Managers, the KMG Responsible Structural Division/ HSE Services ensure that KMG Group Employees, Contractors/Outsourcing, Stakeholders, temporary workers and visitors are informed and are aware of the following areas:

1) KMG's Policy and Procedures for HSE;

2) the duties of the Employees with respect to the requirements of the Policy, Procedures and HSE, including requirements of HSE and emergency preparedness and response to Crisis and Emergency Situations;

3) Risks, Hazards and Environmental Aspects associated with production activities developed by Preventive Measures or Corrective Actions;

4) identification of methods and tools for Risk Assessment;

5) mechanisms for identifying, promoting and proposing effective Risk Management measures, and improving the procedures applied;

6) potential consequences associated with the works, behavior and non-compliance with the established Procedures;

7) advantages due to improvement of personal indicators in the field of HSE;

8) HSE programs, such as the behavioral observation program for safety conducted at the KMG Group of Companies’s Facilities.

KMG strives to ensure the improvement of the competence system in the field of HSE in the KMG Group of Companies, which includes development of necessary skills and practical tools for demonstrating personal commitment to HSE issues.

**9.2. Communication and Consulting**

KMG seeks to maintain effective communication and consultation with Stakeholders regarding HSE.

The obligation of KMG is to provide open information on HSE issues, both within the KMG Group of Companies and beyond.

KMG provides communication, participation and consultation with the involvement of all Stakeholders affected by the activities of the KMG Group of Companies, in order to apply effective working methods in the field of HSE, and ensuring Continuous Improvement with respect to Policies and Objectives.

In the KMG Group of Companies, the following communication methods for HSE are used, including:

1) exchange of information with Employees, Contractors/Outsourcing and visitors at Facilities/Workplaces;

2) interaction with Authorized bodies and consulting with them and Stakeholders;

3) nvolvement of Employees in the Identification of Hazards and Risks, and Environmental Issues, Hazardous and Safe Behavior, Risk Assessment and Identification of Control Elements, Incident Investigation / Pollution of Environment, Development and Analysis of the Policy and Objectives, HSE Recommendations;

4) consulting with Employees and Contractors / Outsourcing, regarding changes affecting their potential Risks in HSE;

Internal communication is carried out using the following methods:

1) all kinds of briefings;

2) forums, meetings, seminars and meetings on HSE issues;

3) HSE programs and initiatives;

4) reporting in the field of HSE;

5) printed and video products (reports, posters, videos, memos);

6) information on Incidents and lessons learned on HSE;

7) information stands of HSE;

8) organization and implementation of functional groups in the areas of HSE (occupational safety and health, industrial and fire safety, health and safety, transport safety, emissions and greenhouse gas management, waste management, water management, energy efficiency) according to the Regulation on the Coordination Council on HSE issues of JSC NC “KazMunayGas” (KMG-PL-2654.1-13);

9) operative reporting, consulting and information exchange in CDMS;

10) Intranet.

External communication, which is a prerequisite for maintaining KMG’s reputation and establishing trust with Contractors/Outsourcing, visitors and Stakeholders, is carried out using the following methods:

1) transfer of information and responses to requests for HSE to Stakeholders;

2) responses to claims and complaints from Stakeholders and Authorized bodies on HSE;

3) interaction and exchange of information with Authorized bodies in Crisis situations;

4) publication of the KMG report on sustainable development;

5) corporate site of KMG.

KMG seeks to ensure a sufficient level of communication in the KMG Group of Companies through a communication plan for HSE, which shall be regularly reviewed and updated.

**9.3. HSE MS Documentation**

KMG establishes and maintains a documented system in the field of HSE necessary to ensure the operation of HSE in accordance with KMG’s internal regulatory documents.

The documented information of the HSE MS includes:

1) Level 1 – The KMG Development Strategy;

2) Level 2 – Policies, Codes and Guidelines of KMG;

3) Level 3 – KMG corporate regulations (bylaws, rules, regulations);

4) Level 4 – KMG roadmap, plans and programs;

5) Level 5 - Technical guidelines and regulations of organizations of the KMG Group of Companies;

6) Level 6 – Plans and programs of organizations of the KMG Group of Companies.

The order of management of documented information in the field of HSE is determined by the Rules for the Management of the IMS Documents (KMG-PR-1.12-59) and the Rules for Records Management (KMG-PR-5.6-59).

Amendments, as well as all supplements to existing documentation in the field of HSE, are regulated by the internal documents of the KMG Group of Companies..

**10. CONTRACTORS AND STAKEHOLDERS (ELEMENT 4)**

The purpose of the Element - Contractors/Outsourcing and Stakeholders are assessed on the capabilities and competencies for the supply / execution / provision of GWSs at the KMG Group of Companies’s Facilities to ensure that their effectiveness in HSE is consistent with the requirements of the KMG Group of Companies.

**10.1. Requirements for Contractors**

When interacting with Contractors / Outsourcing, the organizations of the KMG Group of Companies establish in the contracts requirements for compliance with and assurance of the Policy, Procedures, HSE MS, Legal Requirements for supplying/performing/rendering the GWS, in accordance with the Fund rules.

The requirements for HSE of the KMG Group of Companies’ organizations are established in the technical specifications for contracts with Contractors/Outsourcing that supply/perform/render the GWS.

The rules for identification of hazards and risks in the field of labor protection, industrial safety and environmental protection in the work of increased risk of JSC NC “KazMunayGas” (KMG-PR-2629.1-13) apply to Contractors/Outsourcing Workers specializing in supplying/performing/rendering the GWS of the KMG Group of Companies, where applicable.

In accordance with the technical specification, Contractors/Outsourcing develop a plan for HSE, where applicable, depending on the degree of Risk. The Contractor/Outsourcing is obliged to submit a plan for HSE or review and approval to the KMG Responsible Structural Division/ HSE Service in accordance with the schedule established in the contract, before commencement of supplying/performing/rendering the GWS. The HSE plan in the form of activities is included in the work plan (if necessary).

The Contractor / Outsourcing HSE plan is designed to ensure:

1) requirements of the Policy, Procedures and Processes, Legal Requirements, control measures and resources, responsibility that shall be available to the Contractor/Outsourcing in order to manage HSE issues for the successful implementation of contractual obligations;

2) compatibility of the HSE MS, the HSE plan of the Contractor/Outsourcing with the KMG Policy.

The Contractor/Outsourcing HSE plan shall be reviewed in the following cases:

1) amending the scope of the GWS contract, where applicable;

2) changes in the organizational structure of the KMG Group of Companies and/or the Contractor/Outsourcing;

3) changes in the content of the technical specification to the contract;

4) in the event of an Incident/ Environmental Pollution at the Group of Companies’ Facility.

To assess compliance with the requirements of the Policy, Legal and Other Requirements, KMG provides audits at the KMG Group of Companies’ Facilities, in accordance with the approved schedules, as well as monitoring the implementation of the Contractor/Outsourcing Corrective and/or Preventive Action Plan.

**10.2. Procurement Management**

The responsible structural division of KMG ensures the implementation of a system for interaction with contractors in the field of HSE in the KMG Group of Companies, which regulates Risk Management Processes throughout the Life Cycle of supplying/performing/rendering the GWS by Contractors / Outsourcing, including subcontractors, where applicable.

KMG ensures implementation of the Procedure for evaluation of HSE indicators, including the system of necessary measures for the management of Contractors/Outsourcing, which shall be carried out at each stage of the contract execution in order to improve the performance in the field of HSE.

Management of HSE performance indicators is achieved by reducing Risks, setting performance, monitoring and reporting criteria for HSE, and using this information for Continuous Improvement and providing feedback to the Contractor/Outsourcing selection process.

The KMG Group of Companies establishes the procedures for procurement of GWSs in accordance with the requirements of the Fund, the Legal and Other Requirements, which cover all stages of managing the Contractor/Outsourcing activities in the field of HSE.

**11. RISK AND CHANGE MANAGEMENT (ELEMENT 5)**

he purpose of the Element is the identification, assessment and management of Hazards and Risks related to the activities of the KMG Group of Companies to prevent or reduce the likelihood and consequences of Incidents/Pollution of the environment. Planned and unplanned changes shall be identified and managed.

**11.1. Risk Assessment and Control**

Ensuring the integration of Risk Management in the KMG Group of Companies is based on internal regulatory documents on Risk Management - Methods for identifying and assessing risks, selecting risk management methods for JSC NC “KazMunayGas” and its subsidiary and dependent entities (KMG-MD-986.3-37), Model Regulations organization of the process of management of production and non-production risks in JSC NC “KazMunayGas” and its subsidiary and dependent entities (KMG-PR-251.3-37), which establish common approaches in the application of methods and tools in the framework of the Process of managing production and non-production risks in the KMG Group of Companies.

KMG has developed and implemented Rules for identification of hazards and risks in the field of labor protection, industrial safety and environmental protection in the work of increased risk of JSC NC “KazMunayGas” (KMG-PR-2629.1-13).

Risk and Opportunity Management includes the Identification of Hazards, Opportunities and Environmental Aspects in HSE, Health and Safety Assessment of Workers and the Environment, and the identification of appropriate control measures. The purpose of the Risk Management Process is to minimize the likelihood and consequences of events that adversely affect the health and lives of Workers, the public and the environment, KMG assets, and the ability of the HSE MS to achieve the intended results. The KMG Group of Companies manages HSE risks related to:

1. health and safety of all persons who have access to the workplace at the facility, including contractors and visitors;
2. industrial and fire safety;
3. Environmental Aspects and Environmental Impacts;
4. Stakeholders, compliance obligations, etc.

HSE Risk and Opportunity Management is part of all the activities of the KMG Group of Companies, from design and construction to decommissioning and liquidation, and is carried out throughout the Life Cycle, including exploration and production, transportation, refining and gas, and the supply of final products to the consumer.

The process of Risk Management and Opportunities in the KMG Group of Companies includes the following stages:

1. Identification of Risks and Opportunities;
2. Analysis of Risks and Opportunities;
3. Assessment of Risks and Opportunities;
4. Processing the Risks and Opportunities;
5. Monitoring, Analysis and Management of Risks and Opportunities.

In order to eliminate and reduce the Risks to the lowest acceptable level, the KMG Group of Companies implements appropriate control measures in accordance with the hierarchy of control measures.

To assess the effectiveness and control of Risk Management, KMG uses key performance indicators for HSE for the safety of Processes based on Incident/Environmental Pollution records that provide information on Laggingand Leading Indicators to improve efficiency and overcome barriers to Risk Management.

**11.2. Behavioral Factor Assessment**

KMG developed and implemented the Rules for Behavioral Observance for Safety of JSC NC “KazMunayGas” (KMG-PR-2312.1-13), the Procedure for Behavioral Observance for Safe Operation (KMG-F-2314.1-13/PR-2312.1-13), the Procedure for Behavioral Observance for Safe Driving (KMG-F-2678.1-13/PR-2312.1-13), the Safe Operation Behavioral Observance Card (KMG-F-2313.1-13/PR-2312.1-13) and the Safe Driving Behavioral Observance Card (KMG-F-2679.1-13/PR-2312.1-13), which establish the procedure for implementation of BOSO/BOSD, as well as collection, analysis and processing of results data of BOSO/BOSD when implementing works and riving land vehicles at the Facilities of the KMG Group of Companies.

KMG implements the BOS/BOSD programs in the performance of works and driving of land vehicles that are aimed at identifying and preventing the re-emergence of hazardous activities and hazardous conditions by the Employees of the KMG Group of Companies.

In order to improve safety in the operation of land vehicles and Corporate Culture, KMG has developed and uses a Safety Belt Simulator at the Facilities, which simulates a road collision, which allows Employees to realize the need for seat belts.

BOSO/BOSD is one of the effective tools to enhance the level of Corporate Culture and ways to demonstrate personal commitment and involve managers at all levels and Workers in the HS Management Processes. BOSO/BOSD aims to achieve the following objectives:

1. immediate stopping of dangerous behavior;
2. timely support of safe behavior and those actions that the Employee has taken to fulfill the requirements of HS;
3. identification of the reasons for performing work with violations of the requirements of HS (insufficient training, lack of supervision, improper conditions, etc.);
4. reaffirmation of commitment to the principle of safe work;
5. concentration of employees’ attention on the importance of HS issues;
6. receiving feedback from the Employee and the person conducting the HS.

The results of BOSO/BOSD are prohibited to use for disciplinary punishment against the Employee, for which the BOSO/BOSD was conducted.

**11.3. Change Management**

Risk management procedures are performed prior to the introduction of any material changes in the KMG Group of Companies, the HSE MS or KMG activities. Such changes may include, but are not limited to, the following:

1) the occurred Incident/Pollution of the environment;

2) a significant increase and decrease in the number of employees, reorganization;

3) redistribution of duties;

4) changes in the Legal requirements in accordance with the Rules for monitoring changes in the legislation on environmental protection, occupational safety and health (KMG-PR-174.1-13);

5) changes in the parameters of technological processes, modification or introduction of new equipment;

6) changes that may arise as a result of Preventive or Corrective measures or changes in the methods for controlling Risks;

7) changes in working methods and behavior patterns of Workers;

8) changes in initial, raw materials, chemicals, etc.;

9) the results of monitoring the HSE MS or Audits;

10) recommendations or instructions of Authorized bodies or an insurance company.

The responsible structural division of KMG ensures the implementation of a system for managing changes and Opportunities that regulates approaches and methods for use in the Change and Opportunities Management Process, and also to ensure that:

1) all possible changes are identified, recorded, monitored, passed the Risk Assessment and submitted to the CEO of the KMG Group of Companies/ Line Manager for approval;

2) only approved changes are ready for execution, for which permission was obtained;

3) the impact of changes on the operations and technological processes of the KMG Group of Companies are correctly understood and managed properly;

4) all changes are communicated to the Stakeholders who are related to this matter within and outside the KMG Group of Companies, are recorded, registered and subject to verification.

**12. ASSET DESIGN AND INTEGRITY (ELEMENT 6)**

The purpose of the Element - Assessment and management of risks in HSE is an integral part of planning, design, construction, commissioning and decommissioning of the Facility, which ensures reliable operation of HSE throughout the life of the facility.

**12.1. Planning and Design**

Responsible structural division of KMG/ HSE service carries out expertise of HSE projects, including ongoing projects, in order to increase the efficiency of their implementation by the KMG Group in accordance with the internal documents regulating the investment activities of the KMG Group of Companies (rules, regulations).

The KMG Group develops and conducts an environmental impact assessment for the project documentation for the development, construction, reconstruction, conservation and disposal of Facilities, as well as their environmental support (background, production environmental monitoring) in accordance with the Legal requirements.

The already known and projected Hazards, Risks and Environmental Aspects, as well as the current technical regulations for the operation of the Facilities of the KMG Group of Companies, are taken into account in the planning, design and design, selection of new technologies, units, installations, equipment and workplaces.

Also, during the implementation of projects for the design and construction of the Facility, KMG Group of companies take into account economic, social and environmental consequences.

KMG developed and implemented the Rules for the Isolation of Energy Sources of JSC NC “KazMunayGas” (KMG-PR-2065.1-13) in order to prevent Incident/ Environmental Pollution during repair and preventive maintenance work on equipment of KMG Group of Companies.

The KMG Group of Companies assesses the readiness to prevent and extinguish fires on the Facilities and the effectiveness of contractors/outsourcing contract performance in accordance with the Rules for verification and assessment of the preparedness of organizations belonging to the group of companies of JSC NC “KazMunayGas” to prevention and suppression of fires (KMG- PR-2456.1-13).

KMG aims to improve technical regulations for the design, construction and commissioning of Facilities, including any modifications that must comply with or exceed the Legal requirements, taking into account the application of recognized engineering practices, the implementation of the principles of process safety and risk management.

The KMG Group of Companies takes into account and applies the experience of operation, maintenance of previous projects in the part of HSE and its integration at the early stage of designing the Facilities.

In the event of acquisition or disposal of assets of the KMG Group of Companies, expertise in the field of HSE and due diligence is conducted.

**13. . IMPLEMENTATION AND SAFE OPERATION (ELEMENT 7)**

The purpose of the Element - All Facilities of the KMG Group of Companies are operated and maintained in accordance with the Legal requirements, technical regulations of the organizations of the KMG Group of Companies that are applied for Risk Management. It is extremely important that activities and related risk prevention measures are carried out consistently under the direct supervision of the Line Managers. Each step in the implementation of activities shall lead to the desired result, and intervention, when necessary, shall be timely. The ability to effectively respond to possible Crisis and Emergencies

**13.1. Operational Control**

The KMG Group of Companies has established and maintains Operational Control procedures related to identified Hazards, Risks and Environmental Aspects in the area of ​​ HSE.

The need for operational control measures is determined by:

1) Risk Management Procedures defining activities requiring control measures with the aim of Risk and Hazard Management in the field of HSE, including Risks and Factors created by Contractors/Outsourcing and visitors;

2) analysis by the KMG Management, monitoring and audit that shall be used to identify operations and activities that require monitoring to implement the Policy and Objectives, compliance with the Legal and Other requirements in the field of HSE;

3) works for which the absence of written procedures (for example, a permit for hazardous work) can lead to an Incident/Environmental Pollution or other deviations from the Policy, Legal and Other requirements in the field of HSE, which KMG undertakes perform;

4) scheduled, routine, unscheduled and emergency operations (for example, maintenance, commissioning, shutdown, temporary work and normal operation);

5) identification of all employees of the KMG Group of Companies, including Contractors/Outsourcing and visitors;

6) clear definition of the roles and responsibilities of the Employees whose activities are related to identified Hazards, Risks and Environmental Aspects in HSE.

To manage all processes, operations and activities related to Hazards and Risks and Environmental Aspects in HSE in the KMG Group of Companies, KMG provides operational control in the following areas:

1) purchase of GWS, including equipment related to Hazards and Risks in accordance with the preliminary assessment of the qualifications of potential suppliers and the definition of criteria for HSE;

2) management of HSE operations related to the Facility's Life Cycle, from design to production, sales, use and disposal. Responsible structural division of KMG ensures the implementation of technical requirements for personal protective equipment in the organizations of the group of companies of JSC NC “KazMunayGas”, which regulate uniform requirements for providing workers with individual and collective protection.

3) maintenance of the equipment, ensuring the technical integrity of the production facility in accordance with the internal Procedures of the Group of Companies, as well as the Rules for Isolation of Energy Sources of JSC NC “KazMunayGas” (KMG-PR-2065.1-13);

4) health monitoring of employees is carried out in accordance with the Legal requirements (conducting pre-shift medical examination, compulsory medical examination), and also with the help of the Regulation on the organization of emergency medical care in the Group of Companies of JSC NC “KazMunayGas” (Version 1). The responsible structural division of KMG is implementing the system for assessing the effectiveness of health and safety management in the KMG Group of Companies using tools (Percentage, Gap-analysis) to identify areas for improvement.

5) management of surface transportation operations is provided in accordance with the Legal requirements for road safety and the Regulations for Safe Operation of Land Vehicles of JSC NC “KazMunayGas” (Version 1) to prevent traffic accidents and apply appropriate control measures.

KMG strives for the firm commitment of managers at all levels to support and implement the process safety management system at the KMG Group of Company’s Facilities, which is an effective tool for increasing not only safety in production, but also productivity, cost-effectiveness and quality.

Procedures for Operational Control are communicated to all relevant employees of the KMG Group of Companies within the framework of the training, information and consultation processes.

**13.2. Preparedness and Response to Crisis Situations**

The process of preparedness for and response to Crisis Situations in the organizations of the KMG Group of Companies is carried out in accordance with the Legal Requirements and internal regulatory documents (Emergency Response Plans and Oil Spill Response Plans) agreed with the Authorized bodies.

In accordance with the approved schedules, the KMG Group of Companies’ organizations organize training sessions, integrated exercises and training sessions for practical training in Crisis Situations.

The responsible structural division of KMG ensures the implementation of the Crisis Management System in the KMG Group of Companies, as well as the maintenance of the Procedures aimed at:

1) ensuring compliance with the Legal requirements, sectoral international best practices;

2) identification of possible Crisis Situations;

3) providing an emergency response to prevent or mitigate the consequences of HSE, and consideration of the requirements of the Stakeholders. The consequences of HSE include harming the population, environment, property and reputation of KMG;

4) providing clear instructions to Employees on what response measures shall be taken in Crisis Situations;

5) review of Procedures for responding to Crisis Situations in Action, subsequent analysis and updating of Procedures.

KMG applies a three-tier response structure to Crisis Situations, depending on the nature of the Incident/Environmental Pollution and its spread, each level is responsible for the appropriate level of response, responsibility and support:

1) Level 1: Incident/Environmental Pollution, the consequences of which are eliminated at the site or Facility by the responsible Line Manager on site and/or through its own resources.

2) Level 2: Incident/Environmental Pollution, the impact of which is limited to the Facility, but there is a threat of spreading the impact beyond the Facility, is eliminated by the KMG Group of Companies’ organization forces or necessitates additional resources and support.

3) Level 3: Incident/Environmental Pollution, in order to eliminate the consequences of which, the resources of the organization of the KMG Group of Companies are not sufficient and activation of the Crisis Management Team is required to attract additional resources or support (state emergency services or resources of other organizations). Or Incident/Environmental Pollution with the threat of such spread that may damage the reputation of KMG.

Actions in Crisis and Emergency Situations are established in the emergency response plans of Facilities that are developed on the basis of Risks related to the activities, services and products of the KMG Group of Companies’ organization, which shall include:

1) the order of establishing the nature of the emergency situation;

2) taking into account the needs of the Stakeholders, such as state emergency services and the population located near production facilities;

3) The procedure to be followed in case of an increase in the scale of emergencies;

4) Workers needed to manage the emergency situation, including a description of individual duties and authorities;

5) Procedures for emergency response and control, including management of information exchange within the KMG Group of Companies, as well as providing information to Authorized bodies, to any affected persons and other Stakeholders;

6) Plans and Procedures for the provision of facilities for the safe stay, the performance of rescue activities, the provision of medical care and evacuation, including the evacuation of patients. These plans also provide for the assessment of facilities for resuscitation;

7) Plans and Procedures for preventing, reducing and monitoring the consequences of emergency response activities to the environment;

8) Activities and Procedures for mobilization of equipment, facilities and workers;

9) Activities and Procedures for mobilization of third-party resources to support the Crisis;

10) training and communication programs for Emergency Response Workers and plans for the verification of emergency systems and procedures in action;

11) connection with plans for ensuring the continuity of production.

12) plans for cooperation with Contractors in a crisis situation, where primary response measures are defined, individual roles and responsibilities of Contractors’ Workers.

**14. REPORTING AND INCIDENT INVESTIGATION (ELEMENT 8)**

The purpose of the Element - Incidents are reported, investigated and analyzed in order to prevent the recurrence and increase the effectiveness of the HSE MS. Corrective measures and study are applied.

14.1. **Operative Reporting**

All Incidents of the KMG Group of Companies, as well as Contractors related to the activities of the KMG Group of Companies, are subject to accounting and investigation, and are regulated by the Legal requirements, the Rules on the procedure for notification and investigation of accidents in JSC NC “KazMunayGas” (KMG-PR-2235.1-13 ), which describe:

1) The process of prompt notification of an incident with the transfer of information in a uniform form and in a timely manner;

2) The process of work of the Internal Investigation Commission, depending on the type and level of Incidents;

3) The process of conducting an internal investigation aimed at identifying, analyzing the root causes of the Incident, and developing appropriate Corrective and Preventive Measures to prevent similar Incidents from occurring in the future;

4) The process of analyzing and communicating lessons learned from Incidents to Employees of KMG Group of Companies and Contractors.

The processes of notification of the Incident in the KMG Group of Companies are carried out through the CDMS.

**14.2. Incident Investigation and Employee Involvement**

Notification and investigation of the incidents reporting to the Authorized bodies are conducted in accordance with the Legal requirements.

At the same time, the KMG Group of Companies provides for the organization of an internal investigation of the Incident, in part not inconsistent with the Legal requirements.

The organization of work of the Internal Inquiry Commission for Accidents subject to special investigation is carried out after the organization of the KMG Group of Companies has received the consent of the Chairman of the officially appointed commission for special investigation.

Internal Investigations of the incidents are aimed at preventing the recurrence of such cases in the future by identifying the root causes of HSE, taking into account the specific reasons for the organization of the KMG Group of Companies that have contributed to and contributed to the Incident.

Internal investigations of Incidents contribute to the involvement of Employees in Risk Management Processes, training in Corrective Measures and remedial measures, enhanced control of Risks, and the possibility of using international best practice to investigate Incidents.

The KMG Group of Companies reserves the right to participate in the investigation of the Contractor/Outsourcing Events related to the activities of the KMG Group of Companies’ organizations.

**15. MONITORING, MEASUREMENT AND ANALYSIS (ELEMENT 9)**

The purpose of the Element is the identification and analysis of possible Risks/Hazards/Environmental aspects in order to take timely Corrective and Preventive Measures, collect information for the analysis of the achievement of the Goals, and identify new priority areas.

**15.1.** **Periodic Reporting**

The responsible structural division of KMG monitors and evaluates the information on HSE in accordance with the Rules for functioning of the corporate data management system for HSE data, industrial and fire safety, emergency prevention of JSC NC “KazMunayGas” and its subsidiary and dependent entities (KMG-PR-2198.1-13), which is commensurate with Risks/ Hazards/ Environmental aspects arising from the production activities of the KMG Group of Companies, including:

1) monitoring the implementation of KMG’s objectives, programs and initiatives in the field of HSE (Behavioral Observation Program for Safety and Safe Driving, 10 Steps to Recovery Initiative);

2) effectiveness of means and methods of management of HSE;

3) preventive measures (checking compliance with Legal and other requirements, environmental monitoring, attestation of production facilities for working conditions, mandatory medical examinations of Workers, etc.);

4) corrective measures (tracing incidents/pollution of the environment, occupational diseases, complaints, exceeding the standards of emissions to the environment, etc.);

5) monitoring the opinion of the Stakeholders and ensuring the ability of KMG to meet their expectations.

**15.2.** **Key Performance Indicators**

KMG has developed, implemented and maintained Procedures for the regular monitoring and evaluation of quantitative and qualitative indicators in the field of HSE, which are based on the Legal Requirements, KMG internal documents and international IOGP/IPECA standards.

The HSE service provides information to the KMG Responsible Structural Division for measuring and monitoring key indicators, assessing performance in accordance with the Reporting Rules for key safety and health indicators of JSC NC “KazMunayGas” and its subsidiary dependent entities (KMG-PR-2407.1-13).

Monitoring of the provision of legal requirements, requirements of the HSE MS and environmental protection in the organizations of the KMG Group of Companies is conducted in accordance with the Rules for monitoring environmental management systems, health and safety at SDEs of JSC NC “KazMunayGas” (KMG-PR-185.2- 13) and the Working Instruction on Monitoring Compliance with Safe Working Conditions and Requirements of the Legislation on Occupational Safety and Health at the JSC NC “KazMunayGas” (KMG-RI-885.1-13).

The organizations of the KMG Group of Companies, in accordance with the Legal requirements and internal regulatory documents, carry out:

1) monitoring of key environmental indicators in the framework of industrial environmental monitoring (industrial environmental monitoring);

2) assessment of compliance with emission permits for the environment (waste, discharges and emissions);

3) monitoring of factors affecting the health of Workers is carried out by the HSE Service in accordance with the Legal Requirements;

The responsible structural division of KMG uses information on all types of monitoring in order to:

1) a systematic assessment of the effectiveness of the HSE;

2) monitoring the implementation of the Policy and Objectives, programs and initiatives in the field of HSE;

3) development of an annual plan for the Roadmap for improving the state of labor protection and the environment in the group of companies of JSC NC “KazMunayGas”;

4) identify and implement appropriate programs and initiatives to improve HSE;

5) monitoring compliance with the Legal and Other requirements that KMG has undertaken to perform;

6) development of Corrective and Preventive Measures;

7) informing the Stakeholders;

8) preparing reports for internal reports (KMG Sustainability Report, KMG Annual Report) and external (Reports to IOGP and UN Global Compact) targets, as well as for Stakeholders;

9) preparation of periodic reports on HSE for the Board of Directors of KMG.

**16. VALIDATION AND IMPROVEMENT MEASURES (ELEMENT 10)**

The purpose of the Element - Performance indicators and systems are monitored, verified and revised to identify trends, measure progress, assess compliance and continually improve.

**16.1. Committees**

The KMG Group of Companies is gradually introducing a system of Committees consisting of three levels, whose function is to consider measures to strengthen the HSE (Fig. 3):

1) Level 1: The Committee of the Board of Directors of KMG;

2) Level 2: The KMG Committee is conducted in accordance with the Regulations on the Committee for Health, Safety and Environment of JSC NC “KazMunayGas” (KMG-PR-847.1-13).

3) Level 3: The Committee for organization of the KMG Group of Companies is conducted in accordance with the internal document of the organization of the KMG Group of Companies.



1. Development of corporate standards for HSE, methodological support
2. Analysis of major incidents
3. Development of programs and initiatives, control and monitoring of effectiveness
4. Training and informing on HSE issues
5. Monitoring implementation and compliance with standards and procedures
6. Carrying out Audits, control of execution of procedures
7. Risk assessment, control measures
8. Investigation of Incidents
9. Making recommendations for improvement
10. Formation of the Policy and Strategy
11. Leadership and culture enhancement of HSE
12. Evaluation of the HSE MS performance

Figure 3. Structure of the Committee System

**16.2. Audits**

In the KMG Group of Companies, on a regular basis, internal audits of the HSE MS and environmental protection are carried out in order to:

1) to establish that the HSE MS has been implemented, effective, maintained, and in compliance with the Legal and Other Requirements, the requirements of the internal documents of HSE;

2) identification of opportunities for the continuous improvement of the HSE MS;

3) submission of the information received to the KMG Management.

The system of audits of HSE of the KMG Group of Companies consists of the following types:

1) Audit of the HSE MS conducted by an external party (independent evaluation);

2) the internal audit of the HSE processes is conducted by KMG’s internal audit service in accordance with the Regulation on the Internal Audit Service (KMG-PD-1406.1-11);

3) Audit of HSE at the production facility is carried out by the Responsible Structural Division/ HSE Service;

4) Audit of HSE by the Contractor/Outsourcing, is carried out by the Contractor/Outsourcing forces.

Based on the results of the Facility HSE Audits by the Internal Audit Service of KMG, the Responsible Structural Division/ HSE Service, the plans for corrective and/or preventive measures, indicating the terms and responsible employees, are being developed and their performance is monitored.

**16.3. Management Review**

The analysis by the KMG Board of Directors is an important part of the HSE MS, and is conducted to assess the adequacy, suitability and effectiveness of the HSE MS.

The analysis by the Board of Directors of KMG is carried out regularly.

The Managing Director for Safety and Environment provides information on the effectiveness of the HSE MS for the Board of Directors of KMG, which includes:

1) information on the extent to which the Goals are achieved;

2) information on changed circumstances, including the organizational structure, changes in the Legal and Other requirements that KMG is required to perform;

3) Opportunities for improvement;

4) the adequacy of the use of resources allocated for the operation of the HSE MS;

5) the results of internal and external Audits and assessments of compliance with the Legal requirements, for example, the requirements of the Fund, the status of Corrective and Preventive Measures;

6) the results of the exchange of information, participation and consultation, including requests and expectations of the Stakeholders;

7) effectiveness of the KMG Group of Companies in the field of HSE and recommendations for their improvement;

8) analysis of internal Audits;

9) the status of Investigations of Incidents/Pollution of the Environment, Corrective and Preventive Measures following the results of the investigation;

10) actions based on the results of previous analyzes by the Board of Directors of KMG.

The output of the analysis by the Board of Directors of KMG is:

1) actions to improve the HSE MS performance and its Processes;

2) improvements in the overall performance of the Group of Companies in the field of HSE;

3) approval of the resources needed to implement agreed action plans for HSE.

**17. DOCUMENT REFERENCES**

|  |  |  |
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| 3. | Decision of the Board of JSC NC “KazMunayGas” dated May 24, 2016. Minutes No. 20 | JSC NC “KazMunayGas” Policy on Alcohol, Narcotic Drugs, Psychotropic Substances and their Analogues |
| 4. | Decision of the Board of JSC NC “KazMunayGas” dated December 13, 2016 (Minutes No. 17/2016) | Policy on the Corporate Risk Management System of JSC NC “KazMunayGas” and its Subsidiary Dependent Entities |
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| 15. | KMG-RI-195.2-13 | Introductory Breafing on Health and Safety for Employees of JSC NC “KazMunayGas” |
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| 17. | KMG-PR-2198.1-13 | Rules for Functioning of the Corporate Data Management System on Safety and Environment, Industrial and Fire Safety, Emergency Prevention of JSC NC “KazMunayGas” and its Subsidiary Dependent Entities  |
| 18. | KMG-PR-2235.1-13 | Regulations on the order of notification and investigation of accidents in JSC NC “KazMunayGas”  |
| 19. | Версия 1 | Regulations for safe operation of land vehicles of JSC NC “KazMunayGas” |
| 20. | KMG-PR-2456.1-13 | Rules for Verification and Assessment of Readiness of Organizations Belonging to the Group of Companies of JSC NC “KazMunayGas”, to Prevention and Extinguishing of Fires  |
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