



# Karachaganak Petroleum Operating

## Summary

There are a number of noted human rights allegations related to Karachaganak Petroleum Operating (KPO), including:

➔ **Berezovka:** Complaints to the World Bank about Impacts on the Community: The residents of Berezovka, a village near Karachaganak, had repeatedly raised alarms about the impacts of the oil field upon their community long before the 2014 mass poisoning. Kazakhstani law requires a minimum of five kilometers between residences and the Karachaganak oil field. However, the company convinced the government to reduce the protective zone to just three kilometers. By 2004, 45% of residents in Berezovka suffered from chronic health problems, including cardiovascular problems, chronic illnesses, memory loss, vision loss, muscular-skeletal problems, tooth loss, respiratory illness and gastroenterological problems. Blood samples taken by an independent laboratory during 2004 indicated that villagers were exposed to hydrogen sulphide and other toxins associated with oil production. Sinkholes also opened up inside and around villagers' homes. Because of these impacts, villagers actively sought resettlement for years, but they were repeatedly denied. Activists repeatedly complained to the World Bank and the International Finance Corporation with no result.

➔ **Mass Poisoning of Children and Resettlement of Berezovka:** Nineteen children and three teachers all simultaneously lost consciousness on 28 November 2014. Other villagers had also passed out during the day before; thirty-one people were affected within two days. Over the course of the next six months, the episodes continued. The children were not diagnosed, and their health worsened. Finally, in July 2015, the government announced the village would be relocated and that KPO would pay the bill. However, the government claimed that the resettlement was due to the expansion of activities at



Country: **Netherlands**  
(operates in Kazakhstan)



[Website](#)



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## Human Rights Commitments

- ➔ [Sustainable Development Charter](#)
- ➔ [2019 Sustainability Report](#)
- ➔ [Health, safety and environmental management system](#)
- ➔ [Safety](#)
- ➔ [Emergency response management](#)
- ➔ [Health, safety and environment engagement and programmes](#)
- ➔ [Occupational health](#)
- ➔ [Medical support](#)
- ➔ [Occupational hygiene](#)
- ➔ [Asset integrity](#)
- ➔ [Environment](#)
- ➔ [Environmental protective measures plan](#)
- ➔ [Sanitary protection zone](#)
- ➔ [Environmental monitoring and preventing impacts on communities](#)
- ➔ [Waste management](#)



the oil field and not due to the mass poisoning. The children's symptoms persisted for years, but state-funded hospitals refused to diagnose them. Private medical experts eventually diagnosed the victims with toxic encephalopathy, as a result of exposure to toxic fumes from the oil field. Neither KPO nor the Kazakhstani state authorities have taken responsibility for the tragedy or have compensated the children for the significant damage of their health.

- ➔ **Attacks Against Human Rights Defenders:** School teacher, Svetlana Anosova, traveled to Washington, D.C., to meet with representatives from the World Bank and KPO as well as to inform them about impacts at Berezovka. Afterwards, she began facing threats and pressure from police and local authorities. Eventually, she was banned from teaching. Crude Accountability, which had drafted the complaints to the IFC and World Bank, also faced harassment and threats.
- ➔ **Environmental Degradation, Water Pollution and Additional Complaints to the World Bank:** In 2005, Crude Accountability noted that Karachaganak accounted for up to 40% of all harmful waste in western Kazakhstan. Activists noted a lack of publicly available information for risks related to the oil field. After several complaints to the International Finance Corporation—in 2004, 2007 and 2008—the ombudsman found that the IFC had violated its own policies with regards to Karachaganak Petroleum Operating. Among the noted problems was that there was no hydrogen sulphide monitoring reported from 2003 to 2006; notably, this is the gas that later poisoned the children of Berezovka.
- ➔ **Corruption and Bribery:** Crude Accountability notified the World Bank that a KPO subcontractor had been found guilty of bribery by the U.S. Securities and Exchange Commission. KPO was also accused of making improper payments to customs officials in exchange for ignoring 'paperwork irregularities' that could delay shipments. Critics have also questioned the circumstances surrounding how the state-owned oil company, KazMunaiGas, obtained shares in the company. Additionally, activists claimed that corrupt officials may have misused funds intended to relocate the village of Berezovka.
- ➔ **Labour Rights and Wages:** KPO has been recognised as the company with the highest imbalance in salaries between local and foreign staff. Mass layoffs and delays from payment of wages have also led to worker unrest.

KPO has publicly available policies about the environment, sustainability and other human rights topics. The company did not respond to our questionnaire of its human rights policies and commitments.

- ⊕ **Water use**
- ⊕ **Social responsibility**
- ⊕ **Community engagement**

⊖ Karachaganak Petroleum Operating did not respond to our questionnaire of its human rights policies and commitments

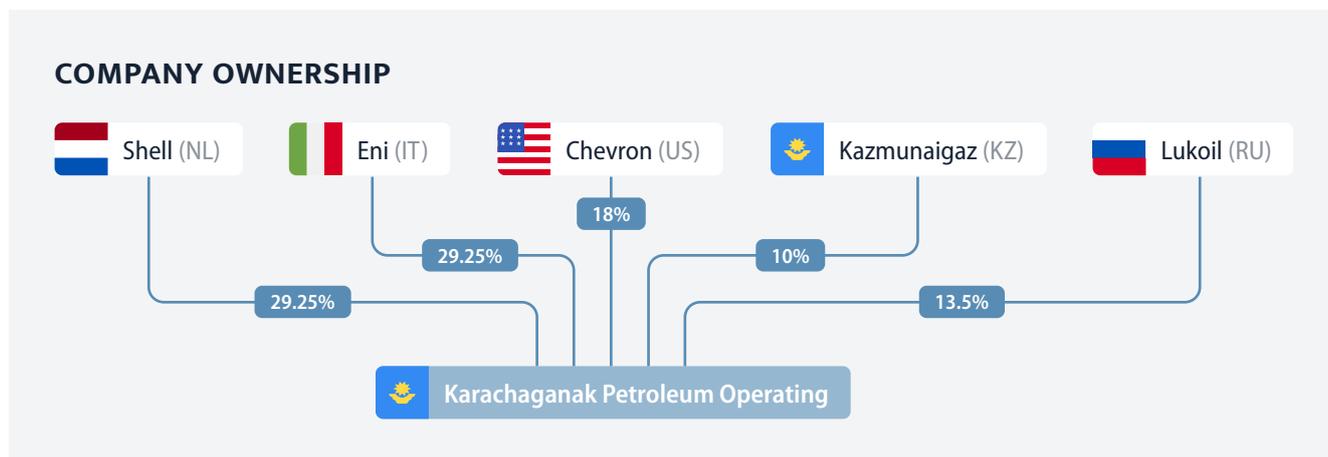
## Human Rights Impacts

- ⚠ Health and safety
- ⚠ Environmental and water rights
- ⚠ Right to livelihood and adequate standard of living
- ⚠ Labour rights and wages
- ⚠ Access to information
- ⚠ Community, cultural and property rights
- ⚠ Resettlement
- ⚠ Attacks on human rights defenders and labour activists
- ⚠ Corruption

## Company Information

Karachaganak Petroleum Operating (KPO) is a joint venture between Royal Dutch Shell (29.25%), Eni (29.25%), Chevron (18%), Lukoil (13.5%) and KazMunaiGas (10%). KPO oversees the expansion and development of Karachaganak, one of the world's largest oil and gas fields.

In May 2002, the International Finance Corporation (IFC) facilitated a \$150 million USD loan to Lukoil with the purpose of increasing production at the Karachaganak oil field. Over the course of several years, affected communities submitted complaints to the World Bank and IFC over the field's impacts.<sup>2</sup> After several complaints to the International Finance Corporation—in 2004, 2007 and 2008—the ombudsman found that the IFC had violated its own policies with regards to Karachaganak Petroleum Operating.<sup>2</sup> Among the noted problems was that there was no hydrogen sulphide monitoring reported from 2003 to 2006; notably, this is the gas that later poisoned the children of Berezovka. The illegality of the sanitary protection zone and the resettlement of Berezovka were not addressed. The ombudsman concluded that the company needed to monitor and to report about its environmental impacts.<sup>2</sup> As a result, Lukoil paid off its loan from the IFC early; the ombudsman and IFC said its involvement was, therefore, complete.<sup>2</sup> Effectively, the IFC washed its hands of its involvement.



## Human Rights Allegations

### Berezovka: Complaints to the World Bank about Impacts on the Community

More than thirty people in the village of Berezovka were poisoned during 2014, including twenty-five children (see below). The residents of Berezovka, a village near Karachaganak, had repeatedly raised alarms about the impacts of the oil field upon their community long before the incident. They were ignored for years; finally, the mass poisoning led to international attention and some government action.

The problems began when the government failed to establish an adequate sanitary protection zone—a protected buffer area around projects with potential environmental and health impacts—between the oil field and the village.<sup>2</sup> Kazakhstani law requires a minimum of five kilometers between residences and the Karachaganak oil field. However, the company convinced the government to reduce the protective zone to just three kilometers, which effectively prevented the village of Berezovka from relocating at the company's expense. The protective zone was reduced without conducting a state environmental assessment, informing local residents or holding public participation. This is in violation of Kazakhstani law and the Aarhus Convention. In 2006, the public prosecutor found the decision to reduce the protective zone illegal, and then it was reinstated.<sup>2</sup>

Additionally, the exact borders of the sanitary protection zone were unclear. KPO staff told Crude Accountability that the boundaries were difficult to determine. ‘How is it possible that the SPZ boundaries are fluid? And how can local residents be expected to respect and understand them, when KPO will not indicate their precise location on a map?’ the NGO criticised.<sup>22</sup>

Impacts became worse after the oil field was redeveloped during 2000. At that point, villagers experienced cardiovascular problems, chronic illnesses, memory loss, vision loss and skin ailments.<sup>23</sup> By 2004, 45% of Berezovka residents suffered from chronic health problems.<sup>24</sup> In addition to the conditions noted above, common issues included muscular-skeletal problems, tooth loss, respiratory illness and gastroenterological problems. Children and teenagers were also strongly affected; ninety-five out of the one hundred high school students studied suffered from weakness, fainting, aggression, memory loss and other conditions.<sup>25</sup>

Blood samples taken by an independent laboratory during 2004 indicated villagers were exposed to hydrogen sulphide and other toxins associated with oil production.<sup>26</sup> The U.S. Agency for Toxic Substances and Disease Registry has classified hydrogen sulfide [sulphide] as a neurotoxin, and intense exposure can cause death or severe illness. Long-term exposure can lead to brain damage, permanent memory loss, vision problems, nausea and headaches. The U.S. Environmental Protection Agency has noted this as a particular risk near oil and gas fields, and communities near such fields have been found to experience ‘neurological deficits’.<sup>27</sup>

Sinkholes also began to open up in the village and the surrounding area. One sinkhole opened up under a resident’s home; nothing had been done about it even a month later. The homeowner expressed fear that part of her house could collapse with her family inside. Activists believed the sinkholes were caused by KPO reinjecting wastewater into the ground at the oil field. Villagers expressed fear that the entire village would fall into a sinkhole.<sup>28</sup>

Environmental problems also posed significant risks to local villages (see below). The quality of water in Berezovka declined significantly, and the villagers were concerned about chemical pollutants. Residents also expressed fear of a major accident (see below).<sup>29</sup> Health problems also escalated, yet villagers complained that they could not get answers to their problems. Women from the village tried to participate in a medical study in Aksai, but they were allegedly physically and verbally threatened by police. The police tried to take the women to police headquarters for questioning.<sup>30</sup>

Because of these impacts, villagers actively sought resettlement for years, but they were repeatedly denied. Initial complaints began during the 1990s, when residents pointed out air and water pollution, as well as worsening health.<sup>31</sup> By the early 2000s, residents repeatedly requested to move, but they were ignored.<sup>32</sup>

As a result, activist Svetlana Anosova, Crude Accountability, Green Salvation, Berezovka Initiative Group and other activists repeatedly complained to the World Bank and the International Finance Corporation (IFC). The IFC, which is part of the World Bank Group, had issued a \$150 million USD loan to Lukoil for the development of the Karachaganak oil field. Activists claimed that the project violated IFC and World Bank standards. Svetlana Anosova, a resident of Berezovka, met with World Bank representatives and KPO executives in 2003 to explain the devastating impacts on the village and to bring up the requests for resettlement. The IFC still did not intervene as a result of the meeting. Formal complaints were made to the World Bank and IFC in 2004, 2007 and 2008. The IFC’s ombudsman finally found the project in violation of IFC standards; notably, KPO had not adequately monitored hydrogen sulphide emissions. However, before action could be taken, Lukoil paid off the loan early.<sup>33</sup> (See the environmental section below for more information.)

Crude Accountability had been documenting evidence of illnesses for more than a decade using U.S.-accredited methodologies. The government rejected the evidence by claiming the methods used were not accredited in Kazakhstan. The government and KPO also funded their own report which said the company did not have negative impacts on Berezovka. Around that time, the state of Kazakhstan obtained shares in KPO via the state-owned oil company, KazMunaiGas.<sup>34</sup>

## Mass Poisoning of Children and Resettlement of Berezovka

Nineteen children and three teachers all simultaneously lost consciousness on 28 November 2014. Other villagers had also passed out the day before; thirty-one people were affected within two days. On 4 December, ambulances treated six more children for poisoning symptoms. Doctors initially dismissed the incident by saying the children had been affected by 'anemia' and 'epilepsy'. The state prosecutor for western Kazakhstan, Serik Karamanov, issued a statement that 'It has been established that at 14:19 on November 27 at the gas-processing complex of KPO B.V. [Karachaganak Petroleum Operating], there occurred a discharge of condensate for a period of two minutes'.<sup>2</sup>

Residents were outraged and yet again petitioned for resettlement.<sup>2</sup> Still, nothing was done. Over the course of the next six months, the episodes continued. The company and the government both denied responsibility. The children were not diagnosed, and their health worsened. Additionally, villagers say that they had never been compensated for the devastating health, environmental and economic impacts they had endured over the past decade, including the mass poisoning.<sup>2</sup>

The Business & Human Rights Resource Centre invited KPO and its shareholders to respond to these allegations.<sup>2</sup> In its response, KPO pointed out that the joint venture disagreed with allegations that Karachaganak Field Operation may have been the cause of illness of the schoolchildren. The company said it believed the statements, the ones about NGO Crude Accountability of the poisoning of Berezovka children by toxic emissions from the Karachaganak field, were factually incorrect. The results of KPO's regular environmental monitoring demonstrated that no harmful concentrations of pollutants that arose from KPO's operations were detected.<sup>2</sup> Crude Accountability later issued a rejoinder saying that public and residents of the village of Berezovka did not believe in the objectivity of information from state bodies and KPO about the harmlessness of the company's operations because the company paid for the activity of the private enterprise Gidromet Ltd, which conducted production monitoring for KPO, and, at the same time, provided data to local environmental authorities.<sup>2</sup>

Finally, during July 2015, the government announced the village would be relocated and that KPO would pay the bill. However, the government claimed that the resettlement was due to the expansion of activities at the oil field, and not due to the mass poisoning.<sup>2</sup> Even though villagers had requested resettlement, they were nervous about the outcome. Svetlana Anosova, a prominent activist, explained, 'We demand that all questions related to relocation and compensation comply with the law and are transparent and fair. People have suffered for many years from the impact of Karachaganak. In addition, we are being forced to give up our homes and our way of life. People are afraid and extremely worried about giving up their homeland. They are afraid they will be lied to by the authorities and KPO and forced to move to a place and into conditions that are worse than Berezovka'.<sup>2</sup> These fears materialised shortly thereafter. Activists like Crude Accountability and Svetlana Anosova investigated how the resettlement money was being used, and they were subsequently harassed and threatened by authorities and anonymous individuals. According to the Coalition for Human Rights in Development, 'Advocacy groups posit that corrupt local authorities who had received large sums of money for the relocation used intimidation in order to discourage inquiry into how the funds were actually being spent'.<sup>2</sup>

Nevertheless, Shell framed the relocation as a very positive outcome while glossing over what caused the village to need relocation in the first place. The statement said the village had been in 'slow decline' for decades anyway. Shell also claimed, 'Every contractor related to KPO's operations must meet the consortium's high health, safety and environmental standards with KPO providing training support to contractors'. The statement emphasised the positive aspects of the new homes for residents while avoiding mentioning what caused the villagers to relocate in the first place. The statement, conspicuously, did not mention the deterioration of health at Berezovka or the mass poisoning of children that prompted the relocation.<sup>2</sup>

Despite the relocation, the poisoned children did not receive appropriate diagnoses or treatment for their condition. Years later, they continued to experience loss of consciousness, seizures, numbness and headaches. Experts noted that these symptoms could indicate toxic encephalopathy. However, KPO refused to pay for treatment of the children, and the vast majority of families could not afford treatment at private or foreign clinics. Public government-funded hospitals refused to recognise the toxic poisoning.<sup>2</sup>

One victim, Albina Iskakova, said that doctors tried to convince her that her condition was psychological due to problems with her family, even though she had a happy family and insisted she was physically ill. The doctors pressured the victims into saying they were unloved by their families and that this was the cause of their problems. Even other villagers turned against the children. Iskakova explained: 'I'm scared to wake up and live on not knowing what will happen next, [if I will] fall or something else. I tried to explain that it was not only us [the poisoned children] who got sick and continued to get sick, they too could get sick ... They tried to convince me that I was wrong and we were to blame. They were trying to convince us that it happened because we came to school without eating breakfast'.<sup>2</sup> She expressed fear around whenever people would ask her about her condition because she expected them to dismiss her or to blame her. (Iskakova's story was shared by artist, Nata Li, a Kazakhstani photographer who captured images of the abandoned village.)<sup>2</sup>

After years of struggle, two of the affected children were diagnosed with toxic encephalopathy. Experts concluded that the girls were exposed to toxic fumes from the oil field, and that they needed a highly expensive, five-year treatment plan. The diagnosis and medical examinations were paid for by a crowdfunding campaign; twenty-three other children who were impacted did not receive a diagnosis, largely due to the high costs. Crude Accountability criticised: 'Despite the children's ongoing symptoms such as convulsions, headache, blood pressure surges and loss of consciousness, for over three years the Kazakhstan state-owned hospitals have not provided a proper diagnosis or prescribed correct treatment for these children. Postponing the diagnosis only worsened the children's health conditions. Neither KPO nor the Kazakhstani state authorities have taken responsibility for the tragedy or compensated the children for the significant damage to their health'.<sup>2</sup> That same month, Kazakhstani authorities announced they would close the investigation due to lack of evidence of a crime, despite the information that activists and families had gathered over the course of more than a decade. Compensation for the mass poisoning was never issued.<sup>2</sup>

'If back then they hadn't wasted time, had helped in time, and admitted to their mistake, then possibly everything would be different now. Maybe I would live differently now', said one victim.<sup>2</sup>

## Attacks Against Human Rights Defenders

Svetlana Anosova, a music teacher in Berezovka, formed a local organization, Zhasyl Dala, to fight for villagers' rights, particularly those of the children she served. Anosova pressed both the government and company for answers about negative health impacts in the village. In 2003, Anosova traveled to Washington, D.C., to meet with representatives from the World Bank and KPO. Afterwards, she began facing threats and pressure from police and local authorities. She was questioned by the National Security Committee, and she was told to stop communicating with the World Bank. She was under almost constant surveillance. In partnership with Crude Accountability, Anosova filed a complaint to the IFC's ombudsman, calling for resettlement of the village. In 2008, she was banned from teaching her students at the local school. However, she did not stop her activism, and she continued to notify international financial institutions about the problems in Berezovka.<sup>2</sup>

Crude Accountability, which had drafted the complaints to the IFC and World Bank, also faced harassment and threats. Crude Accountability and Berezovka Initiative Group were detained and harassed while conducting a human rights seminar with village residents.<sup>2</sup> After the relocation was complete, activist, Sergey Solyanik, and his wife returned to Berezovka to take photographs of the abandoned village. Solyanik pointed out that many former residents continued to visit the cemetery in Berezovka. He intended to ask them about whether they were satisfied with the results of the relocation, but he was detained by the police.<sup>2</sup> He was identified as a 'witness' in a criminal case related to 'distributing false information' about the 2014 mass poisoning of children in Berezovka.<sup>2</sup>

Crude Accountability, Svetlana Anosova, and other activists became the target of a public smear campaign. Anonymous videos and false rumours circulated accusing the activists of serving their self-interests. After the relocation process started, activists pointed out corruption with how resettlement money was being spent (see below). In retaliation, the activists were accused of being paid off to spread misinformation. One video called Crude Accountability members and CIA agents 'organizers of chaos and unrest'.<sup>2</sup>

## Environmental Degradation, Water Pollution and Additional Complaints to the World Bank

In 2005, Crude Accountability noted that Karachaganak accounted for up to 40% of all harmful waste in western Kazakhstan. The waste flowed into the Ural River, contaminating the water with oil products, iron and zinc.<sup>12</sup> Additionally, during the first half of 2004, KPO paid 300 million tenge (\$2.2 million USD) of environmental fines for atmospheric emissions exceeding permitted levels; critics said the company did not comply with environmental measures.<sup>13</sup> The deputy director of the Oblast Territory Environmental Protection Department, Bulat Suleimenov, explained it was more profitable for the company to pay fines for environmental damages than it was to build a waste processing complex.<sup>14</sup>

Activists noted a lack of publicly available information about the risks related to the oil field. In a 2004 letter to the World Bank, Crude Accountability pointed out, ‘We find no evidence in the official documentation of this project demonstrating that an adequate environmental impact assessment of these concerns, including assessment of trans-boundary risks, was undertaken.’<sup>15</sup> Villagers were not provided with information about what was occurring at the field. They took videos of constant night-time flaring and burning for several, consistent nights, and they feared there had been an accident. They also said that they had heard loud booming and crackling. They were not provided with information about the events; follow-up questioning resulted in conflicting answers.<sup>16</sup>

The letter also pointed to the lack of an effective emergency response strategy. The environmental impact assessment calculated possible spills of up to 30,000 tons, but KPO’s field loss prevention manager allegedly told Crude Accountability that the company was prepared only for a spill of up to 8,000 tons. Additionally, environmental monitoring would not provide enough time for Berezovka residents to evacuate in the case of an industrial accident.<sup>17</sup> (Several years later, during 2012, KPO installed towers to provide early warning to residents in case of an accident. However, the towers were notably disabled on the day of the mass poisoning during 2014.)<sup>18</sup> Although the company said an emergency evacuation plan should be in place and understood by each resident, it also emphasised that responsibility for such a plan lies with local authorities and not with the company. Villagers expected that the company would bring buses to evacuate them from the village; the field loss prevention manager said there was no such plan, and the company did not have enough buses to evacuate the village anyway. There were fewer than one hundred gas masks to protect villagers in the case of an emergency, an inadequate amount for the population of 1,286 residents. Moreover, the masks were from 1979.<sup>19</sup>

Additionally, the environmental impacts could have potentially crossed international boundaries; activists pointed out that air pollution may impact communities in Russia, as the winds from Karachaganak blow toward towns and villages around the other side of the border; this includes Ilyek, where residents are concerned about air pollution and subsequent health impacts that they attribute to Karachaganak. Additionally, polluted water could flow into the Caspian Sea.<sup>20</sup>

After several complaints to the International Finance Corporation—in 2004, 2007 and 2008—the ombudsman found that the IFC had violated its own policies with regards to Karachaganak Petroleum Operating.<sup>21</sup> Among the noted problems was that there was no hydrogen sulphide monitoring reported from 2003 to 2006; notably, this is the gas that later poisoned the children of Berezovka. The illegality of the sanitary protection zone and the resettlement of Berezovka were not addressed. The ombudsman concluded that the company needed to monitor and to report about its environmental impacts.<sup>22</sup> As a result, Lukoil paid off its loan from the IFC early; the ombudsman and the IFC said its involvement was, therefore, complete.<sup>23</sup> Effectively, the IFC washed its hands of its involvement.

## Corruption and Bribery

In 2007, Crude Accountability notified the World Bank that a KPO subcontractor had been found guilty of bribery by the U.S. Securities and Exchange Commission.<sup>2</sup> Baker Hughes, a Texas-based oil services company, pleaded guilty to violating US anti-bribery provisions under the United States Foreign Corrupt Practices Act, and he was charged with engaging in corrupt practices. The bribes, which were funnelled to government officials and Kazakhoil (which later became KazMunaiGas), were intended to help Baker Hughes obtain a tender to work at Karachaganak oil field. Baker Hughes agreed to pay a fine of \$44 million USD.<sup>2</sup> The World Bank did not sanction the company.<sup>2</sup>

KPO was also accused of making improper payments to customs officials in exchange for ignoring 'paperwork irregularities' that could delay shipments.<sup>2</sup> Allegedly, KPO paid the bribed through DHL. The informant said that, at one point, KPO ordered DHL not to pay any more bribes; customs officers allegedly paralysed KPO's deliveries for three days, until the bribes resumed. KPO and DHL announced that they would launch a full-scale investigation. Representatives of the customs authority also announced an investigation; interestingly, it did so only to U.S. media outlets and not to Kazakhstani media outlets.<sup>2</sup> Customs authorities insisted that the allegations were untrue and investigations did not turn up any bribes; meanwhile, DHL said it was 'completely unacceptable' for employees to give bribes.<sup>2</sup>

Critics have also questioned the circumstances around how the state-owned oil company, KazMunaiGas, obtained shares with the company. In 2011, investigations were launched which could have resulted in hundreds of millions of dollars of fines. However, authorities rejected evidence provided by Crude Accountability and other activists. The government and KPO jointly funded their own report which cleared KPO of any adverse impacts at Berezovka. The cases against KPO were dropped, and, thereafter, KazMunaiGas received the shares it wanted of the company.<sup>2</sup>

Additionally, activists claimed that corrupt officials may have misused funds intended to relocate the village of Berezovka (see above).

## Labour Rights and Wages

KPO has been recognised as having the highest imbalance of salaries between local and foreign staff among all companies in Kazakhstan. According to a representative of the Ministry of Labor and Social Protection of the Population of the Republic of Kazakhstan, 'The salary of a foreign engineer of the first level of the well operations department is 2,675,426 tenge [\$6,226 USD], and a citizen of Kazakhstan performing the same job duties is 375,823 tenge [\$874 USD], which is seven times lower'.<sup>2</sup>

Allegations of mass lay-offs and delays with payment of wages have also led to worker unrest. In June 2008, workers blocked the road to Karachaganak, demanding hazard pay and better working conditions. An audit of a KPO contractor found violations of the law, including unsanitary conditions in the canteen which could lead to a spread of infectious diseases like salmonellosis and dysentery. Seventy-two violations of the law were recorded related to KPO and its contractors.<sup>2</sup>

# Human Rights Commitments

KPO has the following publicly available policies and commitments related to human rights:

- ➔ [Sustainable Development Charter](#)
- ➔ [Code of conduct](#)
- ➔ [2019 Sustainability Report](#)
- ➔ [Emergency response management](#)
- ➔ [Environmental protective measures plan](#)
- ➔ [Sanitary protection zone](#)
- ➔ [Environmental monitoring and preventing impacts on communities](#)
- ➔ [Waste management](#)
- ➔ [Water use](#)
- ➔ [Community engagement](#)

Notable components of these policies include the following (quoted directly from the company):

- ➔ **Human rights:** Conducting our activities in a way that respects human rights supports our licence to operate. Human rights requirements are embedded in our existing framework, manuals and policies.
- ➔ **Social performance:** We have social performance plans and address the social impacts of our operations on local communities.
- ➔ **Security:** Company-wide security requirements help keep staff, contractors and facilities safe in a way that respects human rights and the security of local communities.
- ➔ **Human resources:** Our policies and standards help us establish fair labour practices and a positive work environment.
- ➔ **Contracting and procurement:** We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible. We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate. KPO has a zero-tolerance approach to modern slavery and child labour is committed to identifying and minimising so far as possible the risk of child labour, slavery and human trafficking occurring in its supply chains and in all areas of its business.
- ➔ **Health, Safety and Environment:** We have a systematic approach to the management of Health, Safety and Environment (HSE), designed to ensure compliance with the applicable laws in this area and to achieve continuous performance improvement, while promoting a culture in which all KPO staff and contractors share this commitment. We set targets for HSE improvements and measure, appraise and report performance levels.

Karachaganak Petroleum Operating did not respond to our questionnaire of its human rights policies and commitments.