

4.3.3. Health and safety at the workplace



Key indicators for 2025

0.07

the number of occupational injuries for the year was 2 cases (LTIFR coefficient)

-33.3%

reduction in the number of cases of severe injuries

100%

the Occupational Health and Safety Management System covered staff and non-staff personnel in 2025

10,306

employees

were covered by training in labour protection and industrial safety

2,752

employees

completed the safety culture programme

Key events of 2025



Comprehensive measures were implemented to prevent RTAs among employees and contracting organizations, including the implementation of a new Programme to ensure the safe operation of vehicles.



The implementation of the Occupational Health and Safety Management System was continued with an emphasis on increasing employee engagement, including the “Safety and Labour Protection Card” programme, under which 35,505 cards were completed.



More than 10 training sessions on occupational safety were organized.



As part of the injury prevention and workplace safety programme, the work of the Injury Prevention Team continued, in which 185 employees participated.

The highest value for the Company is the preservation of the life and health of employees. In its activities, the Company adheres to a responsible approach to issues of industrial safety.

4.3.3.1. Management approach

GRI 3-3

The main directions of the Development Strategy of Kazakhtelecom JSC remain the creation of safe and comfortable working conditions for employees, and also the minimisation of risks related to production activities, and risks of the occurrence of emergency situations.

The issues of industrial safety occupy a strategically important place in the Company's policy and are regarded as one of the key priorities ensuring the sustainability of activities, the continuity of operational processes and compliance with the requirements of legislation. Approaches to ensuring safety are integrated into the corporate strategy and the risk management system and are implemented at all levels of management, including the development of a culture of personal responsibility of employees for health and safety in the performance of work. The Company is aimed at compliance with the best world standards in the area of industrial safety, strictly observes national and international requirements, constantly improves its Occupational Health and Industrial Safety Management System.

The key documents regulating activities in the area of occupational health and industrial safety at Kazakhtelecom JSC are the Policy in the area of occupational health and industrial safety and the Regulation on the occupational health management system. The effect of the indicated documents extends to all employees and contractors of the Company.

Priority tasks of Kazakhtelecom JSC in the area of OHS:

- corresponding observance and application of the Labour Code of the Republic of Kazakhstan;
- provision of safe working conditions and workplaces;
- improvement of the occupational health and industrial safety management system;
- timely identification, assessment and reduction of hazards and risks at workplaces;
- use of modern technologies and practices of leading experience in the area of safety and occupational health;
- introduction of modern means and methods of prevention of industrial injuries and occupational diseases;
- involvement of employees in issues of ensuring safety and the development of a culture of safe work;
- preservation of the life, health and working capacity of employees.

Main internal documents within the framework of which the occupational health and industrial safety management system of Kazakhtelecom JSC functions:

- Policy in the area of occupational health and industrial safety of Kazakhtelecom JSC.
- Regulation on the provision of special clothing, special footwear and personal protective equipment to employees of Kazakhtelecom JSC.
- Rules of conducting training, instructing and verification of knowledge of employees of Kazakhtelecom JSC on issues of safety and occupational health.
- Rules of conducting four-stage control over the state of Safety and occupational health in branches of Kazakhtelecom JSC.
- Standard of the "Safety and Occupational Health Card" programme.
- Regulation of encouragement of employees in the area of safety and occupational health.
- Procedure of actions in the case of emergency events at Kazakhtelecom JSC.
- Policy of management of vehicles of Kazakhtelecom JSC.
- Standard on ensuring the safe operation of vehicles of Kazakhtelecom JSC.
- Rules of conducting obligatory periodic medical examinations of employees of Kazakhtelecom JSC.
- Rules of conducting works in conditions of increased danger under work permits of Kazakhtelecom JSC.
- Fire safety rules at Kazakhtelecom JSC.
- Rules of safety and occupational health under the remote form of work.
- Documented procedure "Emergency preparedness and response".



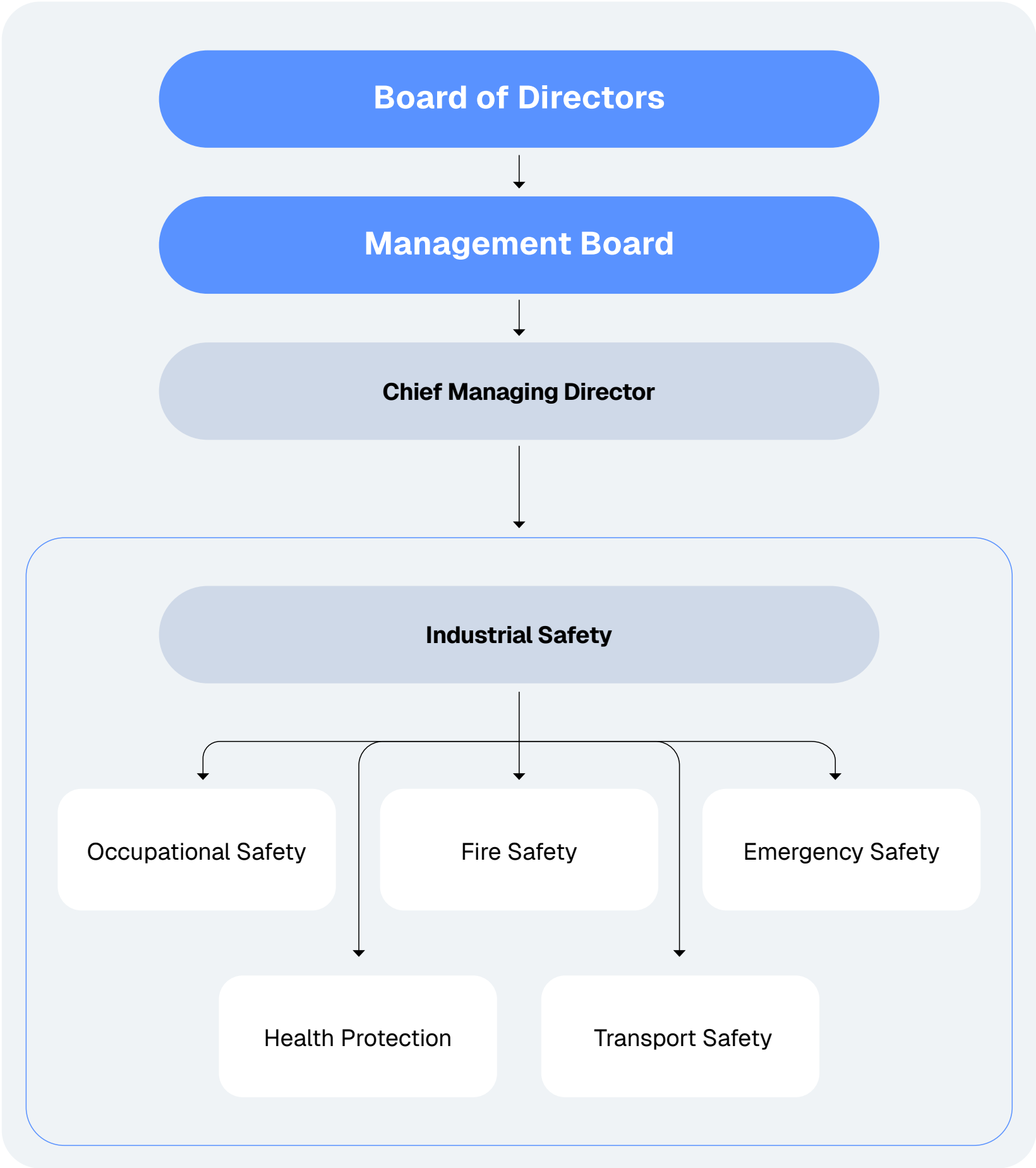
The documents can be reviewed on the Company's website in the "Sustainable development" section, the ["Health and safety at the workplace"](#) subsection.

4.3.3.2. Management structure and tools

At Kazakhtelecom JSC, a multi-level system of management of occupational health and industrial safety has been formed, ensuring the distribution of responsibility and the coordination of functions at all levels of management.

Responsible persons and management bodies:

- **Chairman of the Management Board** — bears overall responsibility for compliance with legislation in the area of industrial safety and the creation of safe working conditions.
- **Chief Administrative Officer** — coordinates the activities of subdivisions and ensures the implementation of state policy in the sphere of occupational health and industrial safety.
- **Industrial Safety Directorate** — carries out the development and introduction of safety standards, methodological support and control over compliance with requirements in all structural subdivisions.
- **Engineers on safety and occupational health in regional and district subdivisions** — ensure control of compliance with safety requirements on the ground.
- **Production Council** — a collegial body with the participation of representatives of employees, trade unions and management, considering incidents, analysing the causes of incidents and forming recommendations on the improvement of working conditions.



Development and introduction of internal regulatory acts:

1. Policies in the area of industrial safety:

- a general document that describes the company's approach to ensuring safety at the workplace.
- Standards, regulations, rules of occupational health: detailed instructions on the safe performance of works in the company's subdivisions.
- Risk assessment: regular assessments and analysis of potential risks that may arise in the process of work.
- Instructions on industrial safety: development of specific instructions for various positions and processes.

2. Training and certification of personnel:

- Programmes of training and instructing on safety for employees of all levels. Periodic trainings on actions in emergency situations (fire safety, actions in case of accidents, first aid, etc.).
- Introduction of the system of certification and attestation of workplaces to verify the compliance of workplaces with regulatory requirements on occupational health.

3. Monitoring and control

- Inspections and audits: regular inspections on the ground to ensure compliance with industrial safety standards.
- Workplace safety risks: inspections of working conditions at workplaces and the introduction of corrective measures upon identification of non-conformities.
- Analysis and investigation of incidents.

4. Internal investigation of accidents

- A procedure of analysis of the causes of incidents with the subsequent compilation of reports and proposals on the improvement of the situation.
- Documentation: keeping of records of all incidents, accidents and incidents, as well as taking measures for the prevention of their recurrence.

5. Programmes on the improvement of working conditions

- Use of personal protective equipment (PPE): provision of employees with the necessary protective equipment.
- Programmes of prevention: regular medical examinations, preventive measures for the prevention of diseases related to production activities.

6. Trade unions and participation of employees

- Kazakhtelecom JSC has mechanisms for taking into account the opinions of employees and trade unions, which contributes to the building of two-way communication and joint control over the state of occupational health. This includes:
 - periodic meetings on issues of industrial safety;
 - system of feedback from employees on the improvement of working conditions;
 - programmes of motivation of employees for compliance with industrial safety standards.

4.3.3.4. Enhancing the occupational health and safety management system

GRI 403-1

A The Company strives to comply with international standards in occupational safety and employee health protection. The Company has implemented occupational health and safety management systems that comply with international standards. The occupational health and industrial safety management system establishes unified requirements in accordance with the “ILO Guidelines on Occupational Safety and Health Management Systems ILO-OSH 2001” and the international standard ISO 45001:2018. A

A The Company constantly improves its occupational health and industrial safety management system in accordance with the requirements of the international standard ILO-OSH, their national analogue ST RK ISO 45001-2018. A

A In the reporting year, work on the development and improvement of the industrial safety management system continued. At the Company, behavioural analysis tools have been introduced — Behavioural Safety Audit (BSA) and Behavioural Safety Dialogue (BSD), aimed at identifying hazardous actions and conditions, as well as discussing safe behaviour models with employees. A

With the aim of ensuring the functioning of the occupational health management system in 2025, the following were carried out:

- planned and unplanned inspections, including four-stage control, identification of violations and control over their elimination;
- control over the provision of employees with personal protective equipment and compliance with the rules of their use;

- implementation of the cascade plan on industrial safety and the goals and plans of the integrated management system;
- updating of internal regulatory documents on industrial safety and the provision of methodological assistance to branches.

Within the framework of the development of the culture of safe work and professional competence of employees, the following events were held:

- 28 April, within the framework of the World Occupational Health Day, under the chairmanship of the Chairman of the Management Board of the Company a working meeting dedicated to issues of industrial safety was held;
- 1 August 2025 in the city of Pavlodar, the “Youth and Occupational Health” competition among the Company’s employees was organized;
- 17 September 2025 in the city of Atyrau, for the first time the Olympiad among engineers on occupational health was held;
- 9 December 2025 in the city of Astana, the Forum on industrial safety “Be Safe: personal responsibility and leadership” was held with the participation of the management of Kazakhtelecom JSC, representatives of Samruk-Kazyna JSC, portfolio companies, branches and subsidiary organizations.

The implementation of the indicated measures is aimed at the development of uniform approaches to risk management and the formation of a culture of safety at the Company.

4.3.3.5. Risk assessment

GRI 403-2

Kazakhtelecom JSC has a responsible attitude to the issues of risk management in the area of occupational health and industrial safety. The risk management process is part of the corporate risk management system and is implemented in accordance with the Company’s policy in the area of industrial safety.

A The assessment of production hazards and risks is conducted within the framework of the approved procedure of hazard identification and risk assessment and represents a systematic process aimed at the prevention of injuries and the reduction of the level of occupational risks. The assessment begins with the analysis of workplaces, technological processes and equipment with account for the data of attestation of workplaces, the results of special assessments of working conditions, audits and investigations of incidents. The identification of potential hazardous and harmful factors is carried out by safety and occupational health engineers jointly with managers and employees. A

A After the identification of hazards, risk analysis is conducted, including the determination of the probability of occurrence of an undesirable event and the severity of possible consequences. The assessment is performed by the methodology adopted at the Company with the use of a risk matrix, allowing risks to be classified by levels — from low to unacceptable. For each process, the residual risk is determined with account for the current engineering and organizational measures of protection. A

All identified hazards and assessed risks are reflected in the corporate register of hazards and risks, which is subject to regular revision. The updating of the register is carried out upon a change of technologies, the introduction of new equipment, based on the results of the investigation of incidents and within the framework of the annual revision.

The results of risk assessment are taken into account in the registration of the system of work permits. Before the

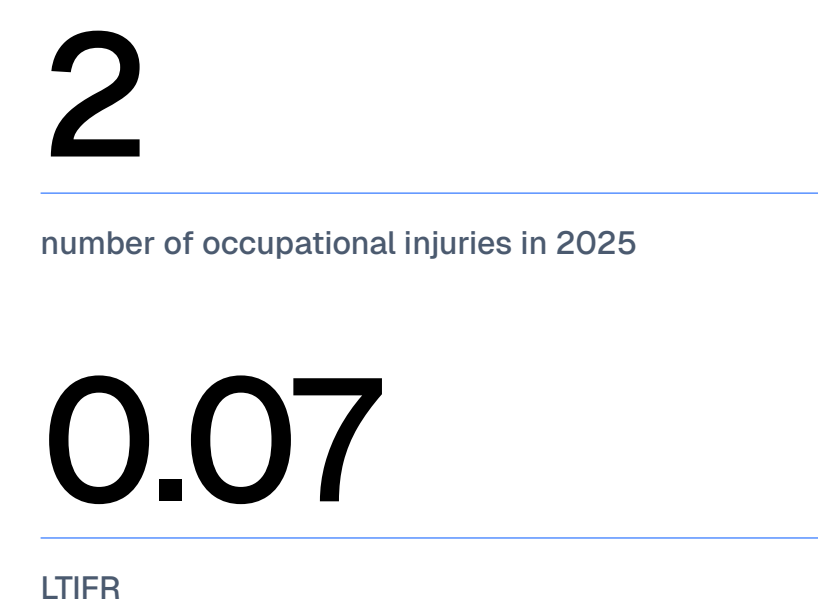
performance of works of increased danger, an operational risk assessment is conducted at the site of performance of works, the presence of provided control measures and the readiness of equipment and personnel are confirmed. The work permit fixes the identification of hazards and the implementation of management measures. Within the framework of the occupational health management system, constant monitoring of the effectiveness of measures taken is carried out by means of inspections, behavioural observations, verifications of compliance with procedures and analysis of data on working conditions. If necessary, risks are revised, and measures on their minimisation are corrected. The Company’s collective agreement provides for the right of employees to refuse to perform works in the case of the occurrence of a threat to life or health with the guarantee of protection from negative consequences upon the realisation of this right.



GRI 403-2, 403-9

Kazakhtelecom JSC regularly identifies and assesses project-related risks and adverse impacts on the health and safety of communities in its areas of operation. Based on the assessment results, protective and preventive measures are developed. Where necessary, the Company cooperates with relevant government authorities and other stakeholders on mitigation measures and plans.

Within the framework of the procedure of hazard identification and risk assessment, the daily activities of all personnel, human behaviour and his abilities, hazards identified near or outside the zone of performance of works, infrastructure, equipment and materials, technological processes are taken into account. At the Company, measures on risk management are determined and conducted.



4.3.3.6. Prevention of industrial injuries

GRI 403-7

The Company pays great attention to the timely prevention or mitigation of adverse impacts on the health and safety of employees, employees of contractor organizations and the population.

In the list of KPIs of heads of structural subdivisions of the Company's branches on industrial safety, the lost time injury frequency (LTIF) indicator is included.

The Company develops and introduces measures aimed at the prevention of industrial injuries.

At the Company, an analysis of the causes of industrial injuries and RTAs is conducted, after which information letters are prepared and sent out in the branches, containing a list of measures on the prevention and prevention of accidents. In addition, the circumstances and causes of incidents are discussed with employees of all subdivisions, and unscheduled instructions on safety and occupational health are also conducted.

Annually, the Plan on ensuring zero injuries is implemented. The report on the fulfilment of this plan is submitted quarterly for consideration of the Board of Directors.

With the aim of introducing leading practices, monitoring of the application of proactive tools of prevention of accidents and injuries has been organized — the conducting of behavioural safety audits, with the registration and investigation of hazardous conditions, hazardous actions and potentially hazardous incidents.

Work has been carried out on enhancing the efficiency of management of contractor organizations, including: an internal regulatory document regulating the management of contractor organizations has been developed; the practice of conducting start-up meetings with contractor organizations with the aim of enhancing the safe performance of works on the territory of the Company's production facilities has been introduced.

GRI 403-9

Table 62. Indicators of injuries among employees of Kazakhtelecom JSC

For all employees	2023	2024	2025
Number of fatalities related to the Company's production activities (units)	0	0	0 A
Fatality rate related to the Company's production activities (%)	0	0	0 A
Number of severe injuries related to the Company's production activities (units)	1	4	2 A
Severe injury rate related to the Company's production activities (%)	0.03	0.12	0.07 A
Number of occupational injuries (units)	6	6	2 A
Occupational injury rate (LTIFR) (%)	0.19	0.19	0.07 A
Total number of working hours (man-hours)	31,780,000	31,308,380	29,430,467 A

Note to the table: The indicated data cover 100% of the Company's employees. No categories of employees have been excluded from this statistics. The coefficients are calculated on the basis of 1.000.000 hours worked.

4.3.3.7. Training of employees and the development of the culture of safe conduct of works

GRI 403-5

The Company introduces leading international practices in the area of safety and occupational health, including in the sphere of training and enhancement of qualifications in OHS.

A At the Company, annual training of employees on occupational health and industrial safety, fire-technical minimum and safety techniques in work on electrical installations is conducted. This training is carried out both in external training organizations and directly at workplaces. A

A In 2025, at Kazakhtelecom JSC, various trainings and educational programmes on occupational health and industrial safety for the Company's employees were conducted. A

For 10 months of the reporting period, at Kazakhtelecom JSC, training of employees in the area of industrial safety was organized with the use of distance and in-person formats. The training covered both online courses on the LMS platform and in-person training programmes aimed at the formation and development of competencies in the sphere of safe work.

Within the framework of distance learning on the LMS platform in the key directions of industrial safety, including the isolation of energy sources (LOTO), fatigue control, the provision of first medical aid, the prevention of injuries, the investigation of incidents and hazard management, 2,716 employees underwent training.

In parallel, in the reporting period, in-person training programmes oriented to the development of practical skills and compliance with the requirements of industrial safety were implemented. The greatest coverage was received by programmes on the culture of labour safety, behavioural safety audit, safe driving and work at potentially hazardous areas. In-person training for 10 months was undergone by 7,861 employees.

Table 64. External training on OHS, industrial safety, fire safety basics, and workplace safety in 2025

0

trained in the management accountability course for top managers

2,814

trained in the safety and labour protection course

2,204

trained in the course on safety rules at HHPs when working at height and high-altitude work

2,335

trained in the electrical safety course

1,560

trained in the fire safety course

1,384

trained in the industrial safety requirements course

2

trained in the NEBOSH IGC course (International General Certificate in Occupational Health and Safety)

6

trained in the IOSH Managing Safety course

On 17 March 2025, a strategic session with the participation of members of the Board of Directors on issues of strategic development was held.

In 2025, eight employees of the PSD underwent training under the international programmes NEBOSH and IOSH, which is evidence of the Company's striving to comply with international standards in the area of occupational health. 86% of managers of Kazakhtelecom JSC participated in the survey on the level of safety culture.

In aggregate for the indicated period, 10,577 employees underwent training under programmes in the area of industrial safety.

At the Company, training of employees on the "Culture of safe work" course is also conducted. In 2025, 2,752 employees from among the production personnel underwent training on this course:

- Safe driving — 2,896 participants.
- Culture of labour safety — 61 participants.
- Safe working environment SWE 2 — 1,415 participants.
- Injury prevention and response IPR 2 — 5,857 participants.
- Facilitator in HSE — 68 participants.

Total coverage: 10,297 participants.

A At the Company, a video training programme for responsible managers on issues of OHS is in effect.

A Within the framework of the programme, employees are shown video materials on such topics as:

- performance of works of increased danger in areas, near power transmission lines and with the use of special equipment;
- methods and techniques of works that ensure the safety of employees;
- provision of first aid in case of accidents.

This programme on the conducting of video training is implemented across all subdivisions and divisions, with constant control and the conducting of analysis and decision-making on the improvement of this programme. Such a method of training makes it possible to enhance the efficiency of employees in the process of production activities, as well as to minimise existing risks at workplaces.

4.3.3.8. Prevention of occupational diseases and health protection

GRI 403-3, 403-6

Since care for employees is a key priority for Kazakhtelecom JSC, particular attention is paid to their health. A Within the framework of the social package for employees, full medical insurance is envisaged. For employees, programmes of health improvement and sanatorium and resort treatment in accordance with the conditions of the Collective Agreement, the “Demeu” programme are also in effect. A

A At the Company, an Integrated Programme on the well-being and health of employees is being implemented, aimed at the monitoring of morbidity and the prevention of diseases with the aim of taking preventive measures and implementing systemic measures on the protection of the health of personnel. The programme includes a complex of measures on monitoring the health state of employees and reducing risks related to production activities. A

Following the implementation of the Programme in 2025, positive dynamics of the employee well-being index were recorded, which is a composite indicator including meaning, intellectual, professional, social, emotional, physical and financial well-being –the growth was

+4%

The employee health index, which assesses the main risk factors for the development of chronic diseases, was maintained at the 2024 level and amounted to

62 points



A Within the framework of the Programme, the provision of consultations on psychological support to employees A was also ensured; the total number of consultations in 2025 was

656

The level of loyalty of programme participants (eNPS) based on the results of 2025 was

90 points,

an increase of 22 points compared with 2024.



A As part of the Comprehensive Well-Being and Health Program, Company employees participated in the “Healthy Life” and “Healthy Back” programs, which assess lung function and the impact of smoking on the lungs, cardiovascular risk assessment, and health testing with assessment of musculoskeletal issues. A

Employees of the Company also actively participated in sports and corporate events, including marathons, KVN and sports days, which contributed to the strengthening of team spirit and the enhancement of personnel engagement.

4.3.3.9. Management of industrial safety and occupational health in contractor organizations

Contractor organizations performing works at the Company’s facilities are obliged to comply with the requirements, standards and norms in the area of environmental protection and industrial safety.

Kazakhtelecom JSC attaches great significance to interaction with suppliers of goods, works and services in the context of management of aspects of safety and occupational health. For this, corresponding requirements are presented to suppliers and contractors in accordance with the corporate standards in the area of industrial safety. At the same time, contractor organizations are obliged independently to control compliance with these requirements in the area of safety and occupational health.

At the Company, a system of assessment of contractor organizations on issues of industrial safety is being implemented. The Company conducts training on aspects of safety and occupational health for employees of contractor organizations. Plans for 2026:

- implementation of the Plan of measures on industrial safety of Kazakhtelecom JSC for 2026;
- conducting of training and enhancement of qualifications of managers and employees of the company;
- conducting of thematic meetings on issues of industrial safety;
- implementation of internal production control;
- introduction of the system of application of proactive tools;
- control and prevention of incidents: systemic monitoring of risks, analysis of the causes of incidents and the introduction of corrective measures.

Plans for the medium term (2027–2030)

By Order No. 211 dated September 15, 2025, the Concept for the Development of the Production Safety Management System of Kazakhtelecom JSC for 2024–2028 was approved, providing for the following:

- implementation of the Plans of measures on industrial safety of Kazakhtelecom JSC;
- development and conducting of internal and external training programmes and courses on industrial safety for all levels of personnel with the aim of reducing violations in work, enhancing reliability and efficiency;
- use of best practices for constant improvement of processes and procedures of ensuring industrial safety;
- digitalization of the processes of industrial safety;
- use of best practices for constant improvement of processes and procedures of ensuring industrial safety.