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Methodology for organizing the Environmental and Social Risk Management System at Eldik Bank OJSC

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Methodology for organizing the Environmental and Social Risk Management System at Eldik Bank OJSC

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1.General Provisions

- 1.1.This Methodology for organizing the Environmental and Social Risk Management System at Eldik Bank OJSC (hereinafter referred to as the Methodology) regulates the business process on the identification and management of environmental and social risks, including gender screening, when providing banking services for lending and/or project financing.
- 1.2.The purpose of this Methodology is to provide a detailed description of the structure and functioning of the Environmental and Social Risk Management System (hereinafter referred to as the ESRMS) at Eldik Bank OJSC (hereinafter referred to as the Bank).
- 1.3.The Methodology presents the main elements of the ESRMS, covering key aspects of environmental and social management within the framework of lending activities, leasing operations, Islamic financing of the Bank and corresponding to the international standards of the International Finance Corporation (hereinafter referred to as the IFC).
- 1.4.The following structural divisions participate in the implementation of this Methodology:
 - ✓ Credit Department
 - ✓ Risk Management Department
 - ✓ Islamic window
 - ✓ Eldik Leasing LLC
 - ✓ Legal Department
 - ✓ Sustainable Development Department (ESG)
 - ✓ Internal Audit Department
 - ✓ Credit Administration Department
- 1.5.The owner of this Methodology is the Sustainable Development Department (ESG).
- 1.6.Eldik Leasing LLC ensures the implementation of the requirements of this Methodology within the scope of its competence, taking into account the internal documents of the Company.

2. Structure of the Environmental and Social Risk Management System

2.1. The Bank's ESRMS is a structure consisting of three main components: the Bank's Environmental and Social Policy, this Methodology, as well as the requirements of the legislation of the Kyrgyz Republic and the standards of the International Finance Corporation (see Scheme 1).

2.2. Environmental and Social Policy of the Bank

A fundamental document approved by the Bank's Board of Directors that defines the goals, objectives and basic principles of environmental and social risk management, including the following risk definitions:

- **Environmental risks** — Environmental risks are potential negative consequences for a business arising from the impact of its activities on the environment (air, water, soil, flora, and fauna). Such risks can lead to losses, legal liability, or reputational damage.
- **Social risks** — these are risks associated with impacts on people and communities, including working conditions, health and safety, the rights of vulnerable groups, forced displacement, equality and access to basic services.
- **Total risk** is a comprehensive assessment of the environmental and social aspects associated with a project.

2.3. **The Methodology for Organizing an ESRMS** is a regulatory document that defines the structure, functions, and procedures for managing environmental and social risks. The document sets out:

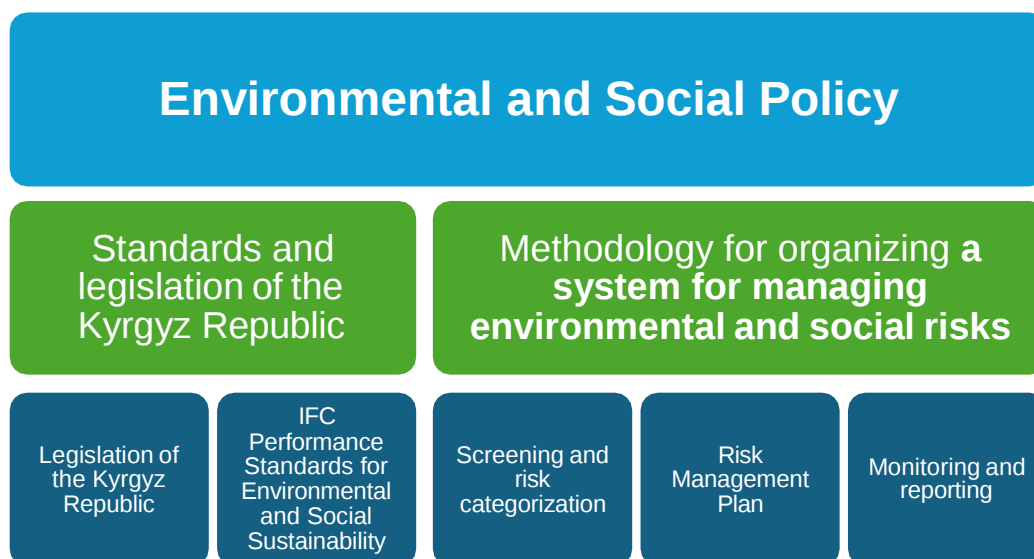
- The processes of identification, assessment and management of environmental and social risks at all stages of the credit cycle, the cycle of Islamic finance.
- Roles and responsibilities of the participants of the Environmental and Social Risk Management system - the Board of Directors, the Risk Management Committee, the Management Board, the Credit Committee, the Credit Department, the Risk Management Department, the Legal Department, the Islamic Window, the Financing Committee, Eldik Leasing LLC, the Management Committee of the LLC Eldik Leasing, Internal Audit Department, and the Sustainable Development Department (ESG)
- Mechanisms for engaging with customers and partners to identify, assess and manage environmental and social risks.

2.4. Compliance with national and international standards:

- The ESRMS has been developed in accordance with the requirements of the legislation of the Kyrgyz Republic and international standards, including the IFC's Performance Standards in the field of environmental and social sustainability.
- The document describes the procedures for bringing the Bank's internal regulatory documents into compliance with national requirements, international conventions and recommendations.
- The Bank ensures regular updating of the ESRMS, including gender screening, taking into account changes in national legislation and the standards of the IFC

2.5. ESRMS framework provides a systematic approach to managing environmental and social risks, ensuring the integration of sustainable development and responsible finance principles into the Bank's overall risk management framework.

Scheme 1 Environmental and Social Risk Management System



3.Environmental and Social Standards

- 3.1. Projects financed by the Bank shall be implemented in compliance with environmental and social standards, as well as the principles of gender equality, in accordance with the Bank's "Sustainable Development Policy", "Environmental and Social Policy", "Gender Equality Policy", and "Sustainable Finance Policy", in strict conformity with the legislation of the Kyrgyz Republic.
- 3.2. When assessing environmental and social risks, the Bank is guided by the IFC's Performance Standards on Environmental and Social Sustainability.¹
- 3.3.A detailed description of the environmental and social standards is provided in Appendix I. The applicability of specific standards depends on the sector, scale, and specifics of the project—not all standards are applicable to every project. Appendix I contains both a detailed description of the standards with which the Bank must comply and a brief overview of the relevant Kyrgyz Republic regulations.
- 3.4. In specific cases where financing is provided by multilateral or bilateral donors, or investment funds, the environmental and social standards of the respective donor shall apply to the Clients' project applications, provided that such requirements do not contradict the legislation of the Kyrgyz Republic. In such situations, coordination between the Bank and the donor regarding the determination of the applicable standard may be required.
- 3.5. When conducting gender screening, the Gender Equality Marker tool is used (Gender Equality Marker (GEM) ². The GEM tool is used to assess and classify financial resources according to their contribution to gender equality and women's empowerment. Based on a four-level scale (0-3) used by the UN system, it allows for the assessment of the extent to which the issued loan/financing/leasing contributes to the promotion of gender equality, tracking the share of gender-sensitive loan/leasing financing projects in the overall portfolio, and ensuring the collection and analysis of gender-disaggregated data. After assessing the project against five main screening criteria - ownership structure, target audience, access to products and services,

¹ International Finance Corporation (IFC) Performance Standards <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

²UNCT Gender Equality Marker (UNCT) Guidance 2024, <https://unsdg.un.org/sites/default/files/2024-03/UNCT-GEM%20Guidance%20Note%5B13%5D%5B3%5D%20%281%29.pdf>

employment and empowerment - the resulting data determines the assessment level on the scale. GEM is assigned to a loan/leasing/financed project according to the table below

Table 2 Gender equality marker

		Gender equality is neither stated nor integrated into the project proposal. Gender aspects are not taken into account, and there is no impact.
		Gender aspects are partially taken into account, but a systematic approach is lacking; individual measures are implemented.
		Gender equality is an important, but not the primary, goal. The project proposal supports women through specific measures (training, services, adaptation of conditions, etc.).
		Achieving gender equality and women's empowerment are the key (transformational) goals of the project and the main reason for its development.

3.6. In cases where a project, programme, or sub-project is proposed for full or partial financing by the Green Climate Fund (hereinafter referred to as the GCF), the Bank shall ensure the conduct of a mandatory environmental and social screening, including an assessment of the risks of sexual exploitation, sexual abuse, and sexual harassment (hereinafter – SEAH), in accordance with the GCF’s Revised Environmental and Social Policy, the GCF Policy on SEAH, and relevant guidelines. For Category B projects, the Bank shall apply the principle of mandatory and proportionate environmental and social risk assessment, which provides for the conduct of an Environmental and Social Impact Assessment (hereinafter referred to as ESIA), regardless of whether such a requirement exists in national legislation.

SEAH encompasses three interrelated categories of misconduct:

- **Sexual Exploitation** – the abuse of a position of vulnerability, power, or trust for sexual purposes;
- **Sexual Abuse** – actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
- **Sexual Harassment** – any unwelcome conduct of a sexual nature that creates an intimidating, hostile, degrading, humiliating, or offensive environment.

The Bank’s approach is based on the "do no harm" principle, which provides for the prevention of the creation or exacerbation of SEAH risks resulting from project implementation.

This instrument is used to identify potential SEAH risks that may arise or be exacerbated during the implementation of activities financed by loan funds, including risks to the borrower’s employees, contractors and subcontractors, clients, local communities, and other stakeholders. The assessment is conducted taking into account SEAH risk factors, as well as the existence of measures for their prevention, detection, and management.

4.Comprehensive environmental and social due diligence

4.1.1. According to the Environmental and Social Policy ³, the Bank considers the environmental and social risk management system as an integral part of the overall risk management system, as it recognizes the significant impact that environmental and social factors can have on the aggravation of all risks inherent in banking activities, particularly negatively affecting the Bank's reputational risk.

4.1.2. Credit, leasing/financing projects financed by the Bank, the size of which exceeds the established thresholds, are required to undergo environmental, social, and gender assessment (screening) in order to make a decision on the possibility of lending/leasing/financing not only based on financial feasibility, but also taking into account environmental and social factors.

4.1.3. The following thresholds (in local currency) are established, above which the ESMS shall apply:

- KGS 250,000,000 (two hundred and fifty million) soms / foreign currency equivalent — for standard credit/financing products;

Methodology for organizing the Environmental and Social Risk Management System at Eldik Bank OJSC, approved by the Order of Eldik Bank OJSC No.149 dated “08” June 2026.

- KGS 250,000,000 (two hundred and fifty million) soms / foreign currency equivalent — for leasing operations;
- KGS 250,000,000 (two hundred and fifty million) soms / foreign currency equivalent — for Islamic finance.

4.1.4. For projects with funding amounts below the established thresholds, a simplified environmental and social screening procedure is applied. This procedure involves a preliminary risk assessment based on the checklist provided in Appendix III to this document. Category C ("low" risk) is assigned if, based on the assessment results, all answers in the checklist are "no." A gender assessment is not required for projects that do not exceed the threshold. However, projects falling under the List of Excluded Activities remain mandatory.

4.1.5. The Bank has the right to set lower thresholds for individual credit products/financing products/leasing transactions based on an internal risk assessment. Mandatory assessment may also be applied regardless of the financing amount in cases where this is stipulated by the terms of the financing partners (e.g., international donors or investment funds).

³ “Environmental and social policy of OJSC Eldik Bank”, approved by the decision of the Board of Directors

4.1.6. The Bank may refuse to provide financing, even in the presence of positive financial forecasts, if the environmental and/or social risks of the project are recognized as excessively high and cannot be reduced to an acceptable level.⁴

4.1.7. This ESRMS applies exclusively to the Bank’s credit, leasing projects/financing products for which the purposes for which the funds will be used are known in advance. The ESRMS does not apply to other forms of financing where the intended purpose of the funds is not defined or is not subject to assessment, including, but not limited to, the provision of funds to microfinance/microcredit companies and funds without pre-defined intended purposes.

4.1.8. The ESRMS is based on:

- ✓ preventing the financing of activities identified as harmful to the environment and society, including on the basis of recognized international financing practices established in the Bank’s Sustainable Development Policy;
- ✓ implementation of an environmental and social risk management system into the Bank’s credit, leasing/financing process, including screening of client activities, assessment and categorization by risk levels, and monitoring in accordance with the Bank’s risk appetite.

4.1.9. If the Bank determines that the project is not an excluded activity, the potential Client will be notified that the Bank will conduct an environmental and social risk assessment as part of the project appraisal process. Responsibility for conducting the Environmental and Social Due Diligence rests with the relevant business units specified in Section 5 of this Methodology, as well as with the Client.

4.1.10. A comprehensive environmental and social due diligence consists of the following stages of environmental and social risk assessment:

- ✓ Check for excluded activities;
- ✓ Risk screening and categorization - analysing a project and assigning it an appropriate risk category (A, B or C) based on the scale and nature of the anticipated environmental and/or social impacts;
- ✓ The development of an Environmental and Social Risk Management Plan (hereinafter referred to as the ESRMP) is a mandatory step for projects classified as Categories A and B and includes measures to reduce and mitigate the identified risks and impacts;
- ✓ Monitoring and reporting - defining the procedure for monitoring the implementation of the ESRMP and providing regular reporting on the implementation of measures aimed at reducing environmental and social risks throughout the project life cycle.

4.2 Checking for excluded activities

4.2.1. The purpose of the review is to determine whether the project is exempt from further consideration under the Bank’s procedures or is an exception in accordance with the established criteria.

4.2.2. As part of the review, the loan officer/Islamic finance specialist/leasing manager completes a questionnaire in the format presented in Appendix II, containing the information necessary to decide on the advisability of further environmental and social risk assessment.

4.2.3. Conducting an inspection allows us to establish:

- whether the project is classified as having a minimal risk level and is therefore exempt from further stages of analysis; or
- whether the project includes activities falling under the list of excluded types of economic activity established by the Bank. Liberation from further assessments.

4.2.4. Projects consisting solely of one or more of the following activities are exempt from the requirements to undergo assessment under the Environmental and Social Risk Management system and gender screening:

⁴“Environmental and social policy of OJSC Eldik Bank” approved by the decision of the Board of Directors

- preparation and dissemination of informational, analytical or communication materials;
- organization of events, seminars and trainings;
- support and development of partners’ potential for participation in international and national negotiations and conferences;
- coordination of partnerships and management of network initiatives;
- implementation of global, regional or national programmes without local level activities (e.g. knowledge management or intergovernmental processes).
- lending/financing to individuals

Important: These exclusion criteria apply only if the specified activities fully cover the entire scope of the project.

4.2.5. Activities excluded from financing. Certain activities are excluded from Bank financing based on the Bank's Sustainable Development Policy. These exclusions apply to projects and initiatives that pose a high risk of negative environmental or social impact and are not consistent with the Bank's sustainable financing principles.

The list of excluded activities is included in the audit questionnaire (Appendix II) and is subject to regular review in accordance with the current version of the Bank's Sustainable Development Policy.

4.3.Environmental and social risk assessment (screening)

4.3.1. If the project does not fall under the excluded activities, the loan officer/Islamic finance specialist/leasing manager is required to initiate collecting information from the client to implement the ESRMS. If the project amount exceeds the threshold specified in paragraph 4.1.3, a full questionnaire (Appendix IV) of ESRMS is completed by a specialist of the Sustainable Development Department (ESG) based on the information provided and materials from the credit specialist/Islamic finance/leasing specialist. Based on the information provided in the questionnaire, the project is assigned the appropriate category of environmental and social risk.

4.3.2. Sustainable Development Department (ESG) is responsible for validating and finalizing the risk category based on the data provided by the credit division and the analysis performed.

4.3.3.Provides the credit division, the Islamic Window, Eldik Leasing LLC with comprehensive support in the process of conducting environmental and social screening, including methodological clarifications, the participation of relevant specialists (including ecologists and/or social experts), as well as assistance in interpreting policy requirements and applying assessment criteria.

4.3.4.Dependent on the scale, nature and likelihood of potential impacts, a project is classified into one of the following three risk categories:

- High-Risk Projects (Category A):** Projects that may cause serious and irreversible environmental and/or social impacts. These impacts may extend beyond the project boundaries and affect vulnerable communities and protected areas. These impacts may significantly affect the health, living conditions, and well-being of affected parties, be long-lasting, irreversible, and have a high probability of occurrence.
- Moderate-Risk Projects (Category B):** Projects whose implementation may be accompanied by environmental and/or social impacts that are less significant and widespread than those of high-risk projects. Such impacts are typically localized and can be effectively addressed through standard mitigation measures. These projects are not expected to result in significant displacement, and the impact on vulnerable groups or ethnic minorities is generally limited.

- **Low-Risk Projects (Category C):** Projects that are likely to have minimal or no environmental and/or social impacts. Potential risks are already considered in the project documentation, and appropriate mitigation measures are already in place. These projects do not involve involuntary resettlement and are not expected to impact vulnerable or ethnic minorities. No additional assessment is required for projects in this category.

4.3.5. The decision-making process for risk categorization within the Environmental and Social Risk Management system is consistent with the general provisions on decision-making and levels of authority established by the relevant **By decision of the Credit Committee, the Committee on Financing within the Islamic Window on Islamic Principles of Banking and Finance, the Management Committee of Eldik Leasing LLC**, in accordance with which, for each level of the committee, there are clearly defined limits of authority, within which the review and approval of projects is carried out taking into account the categorization of environmental and social risks and the corresponding risk management plans, with the exception of category “A” projects.

4.3.6. Credit Committees, Financing Committees, and the Management Committee of Eldik Leasing LLC, depending on the level, are responsible for approving the Environmental and Social Risk Management Plan in accordance with the established monetary limits for each level.

4.3.7. However, for projects classified as Category A (high level of environmental and/or social risk), the decision to finance the project and approve the ESRMP is made by the Bank’s Board of Directors.

4.3.8. This approach ensures that decisions on the most risky projects are made at the level with the greatest authority and expertise to make informed decisions, thereby facilitating the effective management of environmental and social risks.

4.3.9. If a project is classified as Category A and is initially rejected by the Bank’s Board of Directors due to an unacceptably high level of environmental and/or social risks, it may be resubmitted for consideration. To initiate the reconsideration process, the Client must provide an expanded package of documents confirming that the comments of the Board of Directors have been addressed.

4.4. Development of an ESRMP

4.4.1. Assigning a risk category determines whether further due diligence is required. Category C projects, unless additional due diligence is required for specific risks (risks must be identified during the screening process), do not require further due diligence, provided applicable standards and requirements are met.

4.4.2. For Category B or A projects, the Bank requires the Client to manage or implement mitigation measures for potential environmental and social impacts identified during screening before the Bank will continue to review the transaction. The Client must develop a plan to address the identified risks in the form of an ESRMP. A template for the ESRMP is provided in Appendix [IX](#). Table 4

Category A projects must provide a full ESIA (a detailed environmental assessment detailing all stages) including an Environmental and Social Action Plan in accordance with the legislation of the Kyrgyz Republic.

4.4.3. Responsibility for preparing the Environmental and Social Action Plan rests with the Client.

4.3.4. If an ESRMP is required, its provisions are included as mandatory covenants in the Loan Agreement/Financial Lease Agreement/Islamic Finance Agreement between the Bank and the Client. This allows the Bank to mitigate its exposure to environmental and social risks associated with the Client’s activities throughout the term of the transaction and provides the Bank with legal recourse in the event of non-compliance with the terms of the agreement.

4.4.5. ESRMP template (see Appendix [IX](#)) lists the environmental and social risks identified during the screening. If the screening result indicates a high risk (Category A), the ESRMP will identify the need for specific assessment studies and management plans to be implemented by the Client. The Sustainable Development Department (ESG) conducts an expert review and develops the ESRMP

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4.5. Monitoring and reporting

4.5.1. Clients are directly responsible for timely monitoring of environmental and social compliance and for stakeholder engagement in their projects.

4.5.2. The purpose of monitoring is to ensure that clients comply with the environmental and social conditions stipulated in their agreements with the Bank, as well as with national and local legal requirements. Monitoring also allows the Bank to provide annual updates to lenders and other stakeholders.

4.5.3. The frequency of monitoring is determined in the ESRMP, which is an integral part of the loan agreement/financial lease agreement/Islamic finance agreement. The Client is responsible for reporting in accordance with the agreed plan. The Loan Agreement/Financial Lease Agreement/Islamic Finance Agreement also contains provisions for sanctions in the event of failure to fulfill the obligations set out in the ESRMP.

4.5.4. Where an ESRMP has been developed, monitoring and reporting on the proposed risk mitigation measures should be carried out using the template (Appendix IX, Table 5).

4.5.5. The Client is responsible for coordinating monitoring procedures with contractors or project implementers. Contractors are required to promptly report any emergencies. The Client is responsible for conducting its own monitoring and reporting (including in the event of emergencies) and for informing the Bank of environmental and social performance indicators.

4.5.6. "Emergencies" include:

- identification of high-intensity unexpected environmental/social impacts;
- unforeseen accidents;
- unacceptable working conditions (including cases of gender-based violence, child exploitation, forced labor);
- discrepancy national legislation.

4.6. Gender screening of projects

As part of the environmental and social risk assessment procedures, every project subject to full screening of the ESRMS must also undergo mandatory gender screening using the GEM (Gender Equality Marker). Gender screening is carried out using a questionnaire for assessing gender criteria (Appendix V) and includes:

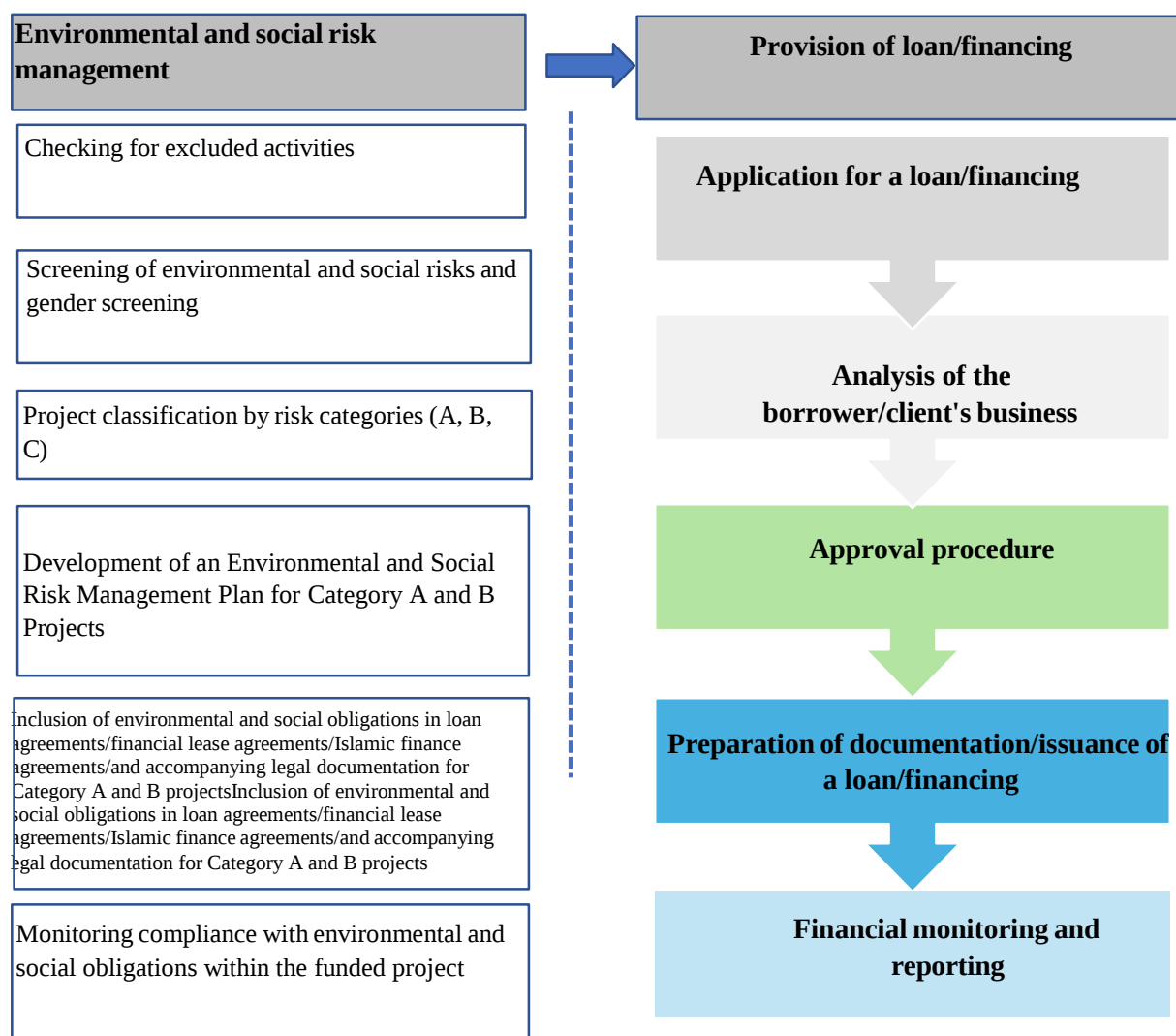
- collection of quantitative and qualitative gender data from the applicant;
- assessing women's participation in ownership structure, target audience, access to products/services, employment and empowerment;
- assignment of one of the GEM gender markers to the project (from GEM 0 to GEM 3).

Responsibility for collection data And filling questionnaires is entrusted on credit specialists/Islamic window specialists/leasing specialists, while subsequent analysis of the data entered into the system is carried out by the Sustainable Development Department (ESG).

4.7. Integration of ESRMS requirements into internal processes

Scheme 2 describes the step-by-step process for incorporating ESRMS requirements into internal funding application review and approval processes.

Figure 2 Compliance with the Environmental and Social Risk Management System during the funding application process



4.8. SEAH Screening and Risk Assessment for GCF-Financed Projects

For all projects, programs, and sub-projects financed fully or partially by GCF funds, the Bank conducts a mandatory screening of relevant risks as part of the environmental and social due diligence. The screening is carried out at an early stage of project application review based on an adapted questionnaire (Appendix VI. "SEAH risk screening and assessment for projects financed by GCF funds" to this Methodology) and is aimed at identifying factors that may affect the level of these risks at all stages of the project life cycle.

The SEAH screening includes the assessment of the following risk factor groups:

4.8.1. SEAH risk factors related to the nature of the activity financed by loan funds, including the engagement of security personnel, migrant workers, and seasonal workers, the performance of work in remote or isolated areas, the housing and transportation of workers, as well as labor and employment conditions;

4.8.2. Measures for the prevention, mitigation, and management of SEAH risks, including formal employment of workers, establishment and operation of grievance redress mechanisms, implementation of internal policies on SEAH issues, as well as the execution of measures to prevent and avoid SEAH incidents.

Classification of SEAH screening results is carried out in accordance with the table provided in Appendix VII. "SEAH Risk Categorization for Projects."

The RMD (ESG) is responsible for validating SEAH screening results, determining the risk level, and preparing the appropriate management measures. The credit officer, Islamic Window specialist, or leasing manager ensures the collection of primary information from the Client and the submission of materials to the RMD (ESG).

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The results of the SEAH screening are taken into account in the overall categorization of environmental and social risks of the project and, if necessary, are reflected in the Environmental and Social Management Plan (ESMP). Recommended measures for the prevention and mitigation of SEAH risks are provided in the table in Appendix VI.

For projects where SEAH risks have been identified, the Bank shall provide for proportionate measures to prevent, mitigate, and respond to them.

5.Responsibilities persons responsible for the Bank's ESRMS

5.1.The distribution of functions and powers of the governing bodies and relevant structural divisions of the Bank, as well as their responsibility for achieving the goals of environmental and social policy, includes the following participants:

1. Board of Directors
2. Risk Management Committee
3. Board of Directors
4. Credit Committee
5. Credit Department
6. Islamic window
7. Financing Committee
8. Eldik Leasing LLC
9. Management Committee of Eldik Leasing LLC
- 10.Risk Management Department
- 11.Legal Department
- 12.Sustainable Development Department (ESG)
- 13.Internal Audit Department

5.2. Table 4 describes the functional responsibilities of the key bodies responsible for the implementation and maintenance of the Environmental and Social Risk Management system in accordance with the Bank’s Environmental and Social Policy ⁵.

Table 4 Responsibilities of the Bank's responsible persons under the ESRMS

Board of Directors	• approves the Environmental and Social Policy • monitors the effectiveness and efficiency of the ESRMS • reviews social and environmental risk management reports • makes decisions on financing Category A projects exceeding the powers of the 1st Level Credit Committee / 1st Level Financing Committee / Management Committee • determines risk appetite.
Risk Management Committee	• oversees the process of managing environmental and social risks • ensures the availability and relevance of internal regulatory documents governing the process of managing environmental and social risks • reviews and approves aggregated reports on the state of economic and social risks in the loan portfolio.
Board of Directors	• monitor the implementation and execution of the Environmental and Social Policy approved by the Board of Directors; • approves and ensures the implementation of internal documents aimed at implementing the Bank’s Environmental and Social Policy within the established powers; • reviews and coordinates internal and external reporting in the area of environmental and social risks. • Considers and approves the candidacies of independent external experts to conduct in-depth economic and social assessments of Category A projects at the suggestion of the Sustainable Development Department (ESG)
Committee on Sustainable Development	• Receive and analyse quarterly reports from the Sustainable Development Department (ESG) on environmental and social complaints received, their progress, response measures and systemic issues identified. • Assessing the adequacy of response measures: Review corrective measures proposed by the Sustainable Development Department (ESG) and assess their adequacy in terms of compliance with the Bank's policies, the requirements of international standards and the principles of environmental and social risk management.
Credit departments	The key responsibilities of the Credit Officer within the ESRMS include the following: • Excluded Activities Check: Checks the loan application for compliance with the List of Excluded Activities. • Collection of Environmental, Social and Gender-Disaggregated Information: ensures receipt of the necessary information and documents

⁵ "Environmental and Social Policy of OJSC Eldik Bank" approved by the decision of the Board of Directors.

	(questionnaires, reports, etc.) from the Client for assessing environmental and Social risks and gender screening. • Interaction with the person responsible for the ESRMS: if the loan amount is less than the established threshold in accordance with paragraph 4.1.2, complete the Economic and Social Risk Assessment Checklist (simplified); if the loan amount exceeds the established thresholds, refer the project to the Sustainable Development Department (ESG) for a full screening and determination of the risk category and preparation of the ESRMP. • Participation in decision-making: compiles a package of documents taking into account the Environmental and Social risk categories identified by the Sustainable Development Department (ESG) and submits it for review to the Credit Committee at the appropriate level. Ensures the Committee is informed of key Environmental and Social risks and the developed ESRMP. • Communication with the Client: Interacts with the client on issues of development and refinement of the environmental and social risk management plan, based on comments and suggestions received from the Sustainable Development Department (ESG). • Monitoring: Participates in monitoring the implementation of environmental and social obligations, including monitoring the implementation of agreed activities and reporting. • Documentation and reporting: ensures that relevant monitoring is properly recorded and stored in the credit file.
Credit Department	The Credit Department is responsible for strategic and regulatory support for all of the Bank's lending activities, including issues related to environmental and social risk management. Its functions within the Environmental and Social Risk Management system include the following: • Implementation of the ESRMS procedures: coordinates internal regulations, methodologies and procedures governing the processes of assessing, categorizing and monitoring environmental and social risks within the framework of lending activities. • Integration of the ESRMS into lending processes: ensures that the requirements of the ESRMS are included in the Bank's overall lending system. • Compliance Monitoring: Monitors compliance with established environmental and social assessment and categorization requirements across all credit units, including conducting checks on the accuracy of categorization and the completeness of the dossier. • Coordination with other departments: interacts with the Department for Sustainable Development (ESG), the Risk Management Department and other structures to ensure the coordinated implementation of the ESRMS.

Islamic window	The key responsibilities of the Islamic Finance Specialist within the Environmental and Social Risk Management framework include the following: • Excluded Activities Check: Checks the funding application against the List of Excluded Activities and determines the environmental and social risk category. • Collection of Environmental, Social and Gender-Disaggregated Information: ensures receipt of the necessary information and documents (questionnaires, reports, etc.) from the Client for assessing Environmental and Social risks and gender screening. • Liaison with the ESRMS Officer: coordinates with the Sustainable Development Department (ESG) during the comprehensive assessment (especially for moderate and high risk projects – categories B and A). • Participation in decision-making: forms a package of documents taking into account environmental and social risks and submits it for consideration to the 1st level committee. Ensures that the Committee is informed about key environmental and social risks and proposed measures to reduce them. • Client Communication: Informs the Client of the Financing Committee's decision and ensures that the relevant plans and activities (e.g. Environmental and Social Risks and proposed measures) are agreed upon and accepted by the Client. • Monitoring: Participates in monitoring the implementation of environmental and social obligations, including monitoring the implementation of agreed activities and reporting. Documentation and reporting ensures that all documentation on Environmental and Social risks and gender assessment, approval and monitoring is properly documented and included in the funding dossier.
Eldik Leasing LLC	The main responsibilities of the Sales Department Manager of Eldik Leasing LLC within the framework of the Environmental and Social Risk Management system include the following: • Excluded Activities Check: Checks the lease application for compliance with the List of Excluded Activities and determines the environmental and social risk category. • Collection of Environmental and Social gender-disaggregated information: ensures receipt from the Client of the necessary information and documents (questionnaires, reports, etc.) for the assessment of Environmental and Social risks and gender screening. • Liaison with the ESRMS Officer: coordinates with Sustainable Development Department (ESG) during the comprehensive assessment (especially for moderate and high risk projects – categories B and A). • Participation in decision-making: compiles a package of documents taking into account environmental and social risks and submits it to the Management Committee for review. Ensures the Committee is informed of key environmental and social risks and proposed mitigation measures. • Communication with the Client: informs the Client of the Credit Committee's decision and ensures that the relevant plans and measures (e.g. Environmental and Social Risks and proposed measures) are agreed upon and accepted by the Client.

	• Monitoring: Participates in monitoring the implementation of environmental and social obligations, including monitoring the implementation of agreed activities and reporting. Documentation and reporting: Ensures that all Environmental, Social and Gender assessment, approval and monitoring documentation is properly completed and included in the loan files.
Risk Management Department	• Conducts an analysis and assessment of the level of environmental and social risks in the Bank’s loan portfolio as a whole (leasing, financial leasing), the results of the assessment are communicated to the Board of Directors. • and assisting the Board of Directors in improving the effectiveness of sustainable development management.
Sustainable Development Department (ESG)	• Ensures the implementation of the ESRMS into the Bank’s operational activities. • In case the project amount exceeds the threshold specified in paragraph 4.1.3, a full ESRMS questionnaire is completed and an ESRMP is prepared based on the information provided by the loan officer/Islamic finance/leasing specialist. • If necessary, initiates and coordinates independent external assessments for Category A projects. • Monitors and analyses complaints received through the complaints mechanism related to environmental and social issues and prepares proposals for corrective actions." • Develops internal documents (methodology, instructions) for the analysis, assessment and monitoring of environmental and social risks; • Maintains and updates the register of requirements for the ESRMS. • Organizes and conducts regular training for Bank employees on the identification, assessment, and management of environmental and social risks. • Analysis and reporting: • Assists structural divisions, if necessary, in the preparation of internal reporting in the area of environmental and social risks of the Bank Provides reports on projects that have passed the ESRMS to the Sustainable Development Committee.
Legal Department	conducts legal review of draft agreements and ensures the inclusion of obligations (covenants) provided for by the ESRMP into the contractual documentation, including the Borrower's obligations to implement measures stipulated by the ESRMP and to comply with environmental and social requirements.
Credit committees	• Projects are reviewed and approved taking into account the categorization of environmental and social risks (B or C) and ESRMP for category “B” projects within established limits. • Consider issues that arise in the event of a client’s failure to comply with the terms of the ESRMP, as recorded in monitoring reports.

Financing Committee	• Decision-making on categorization of environmental and social risks of projects: Financing Committees, within established limits, approve the level of Environmental and Social risks (B or C) based on the submitted documentation and assessment • Approval of ESRMP for Category B projects. The relevant financing committee reviews and approves the proposed risk management plan. Authority levels are applied depending on the funding amount. • Each level of the Financing Committee is assigned a decision-making limit. Risk categorization and approval of the ESRMP are carried out at the level corresponding to the project amount.
Management Committee of Eldik Leasing LLC	• Decision-making on categorization of environmental and social risks of projects: The Management Committee, within the established limits, approves the level of Environmental and Social risks (B or C) based on the submitted documentation and assessment • For Category B projects, the committee reviews and approves the proposed risk management action plan. Established levels of authority apply, depending on the project's size. • Risk categorization and approval of the ESRMP are carried out by the Management Committee within the established limits corresponding to the project amount.
Internal Audit Department	• The Internal Audit Department ensures the audit and assessment of the effectiveness of the systems and processes for managing the sustainable development agenda, including environmental and social risk management, and assists the Board of Directors in improving the effectiveness of sustainability management.

6.Mechanisms supervision of the implementation of the ESRMS

6.1.Integrating the review of Environmental and Social risks into the responsibility of the Risk Management Committee. The Risk Management Committee has overall responsibility for institutional oversight of the implementation of the ESRMS and its integration into the Bank's risk management framework. Its functions include:

6.1.1. ESRMS system implementation provided by the Sustainable Development Department (ESG). These reviews focus on the compliance of procedures and practices with the Bank's Policy, IFC standards, and the national legislation of the Kyrgyz Republic.

6.1.2.Assessing the total exposure of the loan, leasing/financing portfolio to environmental and social risks, identifying sectors or types of projects characterized by a high level of systemic risk, and providing recommendations for managing these risks at the level of the Bank and the leasing company.

6.1.3.Formulation of recommendations to the Bank's Management Board on the strategic management of Environmental and Social risks, including on issues of the acceptable level of concentration of high-risk projects, improvement of the internal regulatory framework and investment priorities of the Bank in the context of sustainable development

6.2.Periodic audits

6.2.1.External Audit. Periodically (at least once every three years), the ESRMS is subject to an independent external assessment, which may be initiated by the

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Bank's Management Board/Risk Management Committee/Sustainable Development Committee. The key elements of the external audit include:

- Analysis of the proper implementation of procedures for identification, categorization and management of Environmental and Social risks at the project and portfolio level.
- Verification of compliance with the Policy and Regulations of the ESRMS, as well as fulfillment of the relevant requirements included in loan agreements / financial lease agreements / Islamic finance agreements.
- Assessing the quality of internal documentation, monitoring mechanisms and reporting on environmental and social issues.
- Identifying systemic gaps and providing recommendations for improving Environmental and Social risk management processes and increasing the Bank's internal capacity.
- Formulating recommendations to address gaps and improve the effectiveness of the ESRMS

6.3.Internal monitoring and reporting system for the Environmental and Social Risk Management system:

6.3.1.Islamic Window, Eldik Leasing LLC exercise general control over the implementation of the ESRMS within the framework of the ESRMP for loans subject to categorization in accordance with paragraph 4.1.2 of this methodology/financing portfolio, including the provision of summarized information on issued loans/leasing/financing, including a breakdown by the level of environmental and social risks. In case of detection non-standard situations — such as failure of the client to implement the ESRMP, the presence of substantiated complaints or significant deviations from the requirements of the ESRMS, - the issue submitted for consideration to the relevant Committee with the participation of the Sustainable Development Department (ESG) to determine further corrective actions.

6.3.2.Risk Management Department aggregates and analyses data on the level of environmental and social risks in the Bank's loan, leasing/financing portfolio and its subsidiary leasing company, and regularly provides relevant information to the Risk Management Committee for review and decision-making at the strategic level.

6.3.3.The Sustainable Development Department (ESG) provides methodological and expert support on issues of assessment and monitoring of environmental and social risks, and is also responsible for integration of key environmental and social indicators and risk metrics, including a quarterly summary of the results of project gender screening And distribution projects by GEM markers, into a centralized monitoring panel (ESG Dashboard), used for making management decisions.

7.Grievance mechanism for environmental and social risks

7.1.General Provisions

The Bank recognizes the importance of having an effective, transparent, and accessible mechanism for submitting and reviewing grievances related to the environmental and social aspects of the activities of the Bank and its clients. The operation of this mechanism is regulated by the internal Regulation "On the Procedure for Reviewing Appeals of Applicants in OJSC 'Eldik Bank'", which establishes a unified procedure for the submission, registration, and review of appeals.

To ensure a comprehensive approach and protect the interests of all stakeholders — including local communities, workers, and citizens whose interests may be affected by projects — the Bank has implemented specific classification categories for appeals. The tracking system includes separate channels for environmental and social issues, SEAH risks, as well as reports of unlawful actions (whistleblowing).

The introduction of these categories allows the Bank to classify incoming information more accurately, ensure its confidentiality (where applicable), and guarantee the timely and effective processing of each appeal in accordance with international sustainable development standards, taking into account the need

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to ensure confidentiality, protect affected individuals, and prevent retaliation against applicants, witnesses, and other involved parties. Grievances related to SEAH risks are reviewed using a survivor-centered approach, in compliance with the principles of safety, confidentiality, respect, non-discrimination, and informed consent.

7.2.Objectives of the complaints mechanism

- Ensure that complaint mechanisms are accessible in a convenient and understandable form;
- Enhance transparency and accountability in environmental and social risk management;
- To promptly identify and address potential violations and systemic deficiencies within the ESRMS;
- Strengthen stakeholder confidence in the Bank's environmental and social responsibility system.

7.3. Responsible structural divisions

- **Complaint registration:** This is handled through customer support and the Bank's office. All complaints are registered in accordance with the requirements of the Complaint Procedure Regulation.
- **Profile assessment:** Complaints related to environmental and social issues are referred to the Sustainable Development Department (ESG), which conducts a preliminary assessment of the complaint's content, initiates an internal investigation if necessary, and proposes corrective measures.
- **Monitoring and reporting:** The Sustainable Development Department (ESG) maintains a register of complaints on Environmental and Social issues and prepares quarterly reports to the Sustainable Development Committee. These reports provide information on complaints received, the outcome of their review, outstanding issues, and systemic problems.

7.4. Link to the ESRMS

Information received from complaints is used to monitor the implementation of the ESRMP for projects. In the event of repeated complaints or identified systemic violations, the matter may be referred to the Credit Committee/Financing Committee/Management Committee of Eldik Leasing LLC at the appropriate level for decisions on corrective measures.

7.5.Transparency and public reporting

Summary information on complaints received and the measures taken is published in the Bank's annual ESG report. Additionally, at the discretion of management, it may be posted on the Bank's website.

8.Final Provisions

8.1. This Methodology shall enter into force upon its approval and shall be mandatory for all structural units of the Bank and Bank officials involved in the described process.

8.2. In the event of changes to the Bank's organizational structure, the functions of the units/specialists involved in this document shall be performed by the units/specialists to whom these functions are transferred in accordance with the new organizational structure.

8.3. This Methodology shall be reviewed by the Sustainable Development Department (ESG) as necessary, and on an ad hoc basis upon identification of new risks or vulnerabilities, based on the results of internal and external audits, as well as to align the processes defined by the Methodology with actual conditions and current requirements that necessitate the updating of the document.

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8.4. Matters not covered by this Methodology shall be governed by the current legislation of the Kyrgyz Republic and regulatory legal acts, IFC standards, decisions of the Bank’s Board of Directors, and other internal documents of the Bank.

Appendix I. Environmental and Social Standards

Standard 1: Assessing and managing environmental and social risks and impacts

A. Description of the standard

This Standard emphasizes the importance of identifying and managing environmental and social risks and impacts throughout all stages of project implementation.

Its main objectives are as follows:

- identification and assessment of environmental and social risks and impacts associated with the project;
- application of a “hierarchy of mitigation measures” ⁶that includes prevention, avoidance, minimization, and, in the case of “residual impacts,” compensation or reparation of negative impacts on employees, affected communities, and the environment;
- Ensuring that complaints from affected communities and stakeholder input are addressed in a timely and appropriate manner;
- facilitating constructive engagement with affected communities and ensuring disclosure of necessary environmental and social information.

In order to comply with the requirements of this Standard, **the Bank is obliged to implement and maintain an organizational structure for the full and effective functioning of the ESRMS** provided for in this document.

This Standard requires the Bank to undertake a comprehensive due diligence process to identify and assess the environmental and social risks and potential impacts associated with projects under consideration.

The applicability of Standards 2–8 is determined within the process of identifying environmental and social risks and impacts required by Standard 1 and set out in Section 5 of the ESRMS framework.

B. Legislation of the Kyrgyz Republic

In the Kyrgyz Republic, environmental and social risk management is based on current legislation, which complies with international standards and is applied, among other things, to bank financing of projects with potential environmental and social impacts. Environmental impact assessments are conducted in accordance with the following regulatory documents:

- ✓ Law of the Kyrgyz Republic "On Environmental Protection" No. 53 dated June 16, 1999.
- ✓ The Law of the Kyrgyz Republic “On Environmental Expertise” No. 54 is dated June 16, 1999.
- ✓ Resolution of the Government of the Kyrgyz Republic “On approval of the Regulation on the procedure for conducting state environmental expertise” No. 248 dated May 7, 2014;

Resolution of the Government of the Kyrgyz Republic “On approval of the Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic” No. 60 dated February 13, 2015.

The Law of the Kyrgyz Republic "On Environmental Protection" (1999) establishes the fundamental rules for the rational use of natural resources and environmental protection. The law stipulates mandatory environmental impact assessments prior to the commencement of activities, the

⁶A holistic approach to risk management that includes anticipating, preventing, minimizing, and compensating for residual impacts (impacts that remain even after all possible risk management measures have been implemented and that must be compensated for or mitigated by additional measures).

establishment of environmental standards, and the implementation of environmental protection measures. Legal entities are required to develop and implement environmental protection plans. The law also grants citizens the right to file complaints and demands for compensation for environmental damage (Article 33), which is consistent with the principle of a "complaint review mechanism." However, issues of integrated risk management are additionally regulated by other regulations—on environmental impact assessments and environmental impact assessments.

The Law of the Kyrgyz Republic "On Environmental Assessment" (1999) defines the legal basis for conducting environmental assessments by authorized state bodies. The Ministry of Natural Resources, Ecology, and Technical Supervision of the Kyrgyz Republic is responsible for reviewing environmental impact assessment documentation, deciding on its approval or rejection, and monitoring compliance with environmental requirements.

The Kyrgyz Government Resolution "On Approval of the Regulation on the Procedure for Conducting State Environmental Expertise in the Kyrgyz Republic" (2014) establishes mandatory environmental impact assessments at the decision-making stage for projects that may have an environmental impact. This allows for the early identification of risks before project approval. Projects are classified by risk level—similar to categories A, B, and C in the International Finance Corporation classification. The assessment considers alternative project implementation options and mitigation measures, including the possibility of rejecting projects with unacceptable environmental consequences.

The Kyrgyz Government Resolution "On Approval of the Regulation on the Procedure for Conducting Environmental Impact Assessments in the Kyrgyz Republic" (2015) regulates the procedure for conducting environmental impact assessments and introduces a formal classification of projects by environmental risk. The Resolution on Environmental Impact Assessment contains clear provisions on the preliminary screening of projects, risk classification, and initial environmental assessment procedures. High-risk projects are subject to a full environmental impact assessment procedure and include large industrial and infrastructure facilities or other facilities with a high level of environmental hazard. Medium-risk projects are required to undergo an abbreviated environmental impact assessment (simplified in composition and detail), while low-risk projects are required to undergo only a preliminary environmental impact assessment or an abbreviated environmental impact statement. See Table 2 and Table 3.

Table 1 List of types of economic activities subject to environmental impact assessment

Energy and industry	
Energy	- Construction and operation of thermal and hydroelectric power plants - Industrial installations for generating electricity, steam and hot water - Production and processing of oil, gas, and coal
Mining industry	- Mining and processing industry facilities - Geological exploration and pilot production work; - Mining (ores, coal, non-metallic materials) - Ore enrichment and processing - Production of non-ferrous, rare and precious metals - Objects of metallurgy, mechanical engineering, and instrument making - Production of building materials
Light industry	- Textile enterprises; tanneries; pulp and paper production, dyeing industries, rubber production

Recreational and industrial zones: construction of recreational and tourist facilities; organization of industrial hubs (industrial zones)
Agriculture and water management:
- Irrigation, drainage, land reclamation and reclamation projects - Large poultry, livestock and fish farming complexes - Water management facilities: dams, weirs, canals, large reservoirs and hydraulic structures - Food and processing industry: production of fats and oils, meat and dairy production, sugar factories, tobacco factories, wine and vodka factories, production of alcohol, beer, and canned goods
Chemical and food industries
- Production of chemicals, fertilizers, medicines, biological and protein preparations - Enterprises of the meat, dairy, brewing, alcohol, and tobacco industries
Infrastructure
- Construction of roads and railways, airports and airfields, test sites, inland waterway ports - High-voltage power lines, pipelines - Fuel depots (oil, gas, coal), gas stations, service stations, industrial zones, fuel and lubricants depots - Treatment facilities and water supply: wastewater and flue gas treatment plants; groundwater intakes; water supply systems for populated areas; irrigation and drainage systems
Environmentally sensitive objects
- Facilities for the disposal, processing and burial of industrial and household waste (including hazardous and toxic) - Storage facilities for toxic and radioactive substances - Treatment facilities, water intakes - Construction in specially protected natural areas

Source: Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic (Resolution of the Government of the Kyrgyz Republic, No. 60 dated 13.02.2015)

Based on the described regulatory procedure in the Kyrgyz Republic (Resolution of the Government of the Kyrgyz Republic, No. 60 dated 13.02.2015 “On approval of the Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic” and Resolution of the Government of the Kyrgyz Republic “On approval of the Regulation on the procedure for conducting state environmental expertise” No. 248 dated 7 May 2014), the credit specialist / leasing manager / Islamic finance specialist must request from the Client **the following documents** related to the procedures **environmental impact assessments** and **state environmental assessment**, depending on the level of environmental risk of the project:

1. Environmental Impact Assessment Report

1. Full form - for projects with a high level of environmental risk
2. Short form - for projects with a medium risk level
3. Preliminary Environmental Impact Statement - for low-risk projects

2. Design documentation

1. The main technical design and/or feasibility study (technical and economic justification) submitted for environmental assessment

3. Conclusion on the expected environmental consequences

1. A document summarizing the expected impacts and proposed measures to reduce,

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mitigate and/or compensate for them

4. **Public discussion materials for the project** (if it was carried out)
 1. Minutes of hearings, publications, public comments
 2. Important: Mandatory for projects subject to a full environmental impact assessment
5. **Conclusion of the State Environmental Expertise**
 1. A positive conclusion confirming the admissibility of the project implementation
 2. In case of a negative conclusion, a revised project and re-submission
6. **Results of the Public Environmental Expertise**
 1. If the project has generated public interest or an independent environmental assessment has been carried out at the initiative of civil society

Standard 2: Labor Relations and Working Conditions

A. Description of the standard

This Standard recognizes that sustainable economic development is based on respect for the fundamental rights of workers. The key objectives of the Standard include:

- ensuring fair treatment, non-discrimination and equal opportunity in the workplace;
- formation of stable and constructive labor relations between employees and employers;
- compliance with applicable national labor and employment laws;
- protection of workers' rights, including those of vulnerable groups;
- ensuring safe and healthy working conditions, as well as protecting the physical and psycho-emotional state of workers;
- prevention of all forms of forced labor.

This Standard applies to employees of enterprises that are potential borrowers of the Bank. The key requirements of the Standard are grouped into the following areas:

Working conditions and management of labor relations

- Human Resource Management Policies
- Working conditions and employment provisions
- Freedom of association and the right to form trade unions
- Non-discrimination and equal opportunities
- Managing the process of staff reduction (retrenching)
- A functioning mechanism for filing and reviewing employee complaints

Protection labor right

- Prohibition of child labor
- Prohibition of forced labor

Occupational health and safety

- Ensuring the safety of workers, including workers employed by third parties

B. National legislation

Labor relations in the Kyrgyz Republic are regulated by a set of regulations aimed at protecting workers' rights, ensuring equal opportunities, labor protection, and preventing discrimination and forced labor.

1. **The Labor Code of the Kyrgyz Republic (2025)** ⁷is the primary regulatory document governing labor relations and related issues. The Code establishes minimum labor guarantees, rights, and freedoms for parties to labor relations. **Article 9** explicitly prohibits discrimination in labor and guarantees equal labor rights for all citizens regardless of nationality, gender, language, religion, political views, social status, or property status. It also establishes provisions on employment contracts, working conditions, employee rights, and employer obligations.
2. **Law of the Kyrgyz Republic "On Labor Protection" (2003)** ⁸defines the legal basis for ensuring occupational health, safety and hygiene and includes requirements for working conditions, the employer's obligations to create a safe working environment and prevent industrial injuries.
3. **Law of the Kyrgyz Republic "On Guaranteed State Minimum Social Standards" (2009)** ⁹establishes minimum social guarantees, including standards in the areas of wages, health protection and working conditions.
4. **The Law of the Kyrgyz Republic "On Promoting Employment of the Population" (2015)** ¹⁰is aimed at regulating the labor market, promoting employment, protecting the unemployed and

⁷ <https://cbd.minjust.gov.kg/3-45/edition/25298/ru>

⁸ <https://cbd.minjust.gov.kg/1293/edition/732150/ru>

⁹ <https://cbd.minjust.gov.kg/4-3973/edition/956383/ru>

¹⁰ <https://cbd.minjust.gov.kg/111258/edition/1235914/ru>

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vulnerable groups of the population, and provides for measures to actively support employment and vocational training.

5. **Criminal Code of the Kyrgyz Republic (2021)**¹¹ establishes criminal liability for the use of **forced labor**, including within the framework of labor relations.
6. **The Law of the Kyrgyz Republic “On State Guarantees of Equal Rights and Opportunities for Men and Women” (2008)**¹², which establishes state guarantees in the area of non-discrimination, including in the area of labor relations.

Standard 3: Resource Efficiency and Pollution Prevention

A. Performance standard

This Standard aims to ensure rational and sustainable use of resources (energy, water, raw materials) and minimise the negative impacts of pollution in both the short and long term for public health and the environment.

The key objectives of the Standard include:

- preventing or reducing negative impacts on human health and the environment by reducing the level of pollution associated with project activities;
- promoting sustainable use of resources, including energy and water resources;
- reduction of greenhouse gas emissions associated with the implementation of the project.

The main requirements are classified according to the following areas:

Effective usage resources

- Greenhouse gas emissions management
- Rational use of water

Prevention pollution

- Waste management
- Handling hazardous materials
- Pesticide use and management

B. National legislation

In the Kyrgyz Republic, issues of rational use of resources and pollution prevention are regulated by a number of specialized laws and regulations consistent with international standards, including **IFC Standard 3**.

1. **The Law of the Kyrgyz Republic "On Environmental Protection" (1999)**¹³ establishes the basic principles of rational environmental management, pollution control, environmental regulation, mandatory monitoring, and provides for liability for environmental damage. The law enshrines the right of citizens to access environmental information and participate in decision-making.
2. **The Law of the Kyrgyz Republic "On Production and Consumption Waste" (2023)**¹⁴ regulates waste management with the aim of minimizing environmental impact. The law provides for the reduction of waste generation, the development of reuse and recycling systems, and strict control over the handling of hazardous waste.

¹¹<https://cbd.minjust.gov.kg/3-38/edition/2087/ru>

¹²<https://cbd.minjust.gov.kg/202398/edition/382698/ru>

¹³<https://cbd.minjust.gov.kg/218/edition/6734/ru>

¹⁴<https://cbd.minjust.gov.kg/4-879/edition/1277328/ru>

3. **The Law of the Kyrgyz Republic “On the Protection of Atmospheric Air” (1999)** ¹⁵establishes standards for maximum permissible emissions and requirements for obtaining permits for pollutant emissions, including obligations to reduce them.
4. **The Law of the Kyrgyz Republic "On Renewable Energy Sources" (2022)** ¹⁶aims to stimulate the development of solar, wind, and hydropower. The law promotes the implementation of energy-efficient technologies, reduces pollution and greenhouse gas emissions, and also provides economic incentives for investors.
5. **The Resolution of the Government of the Kyrgyz Republic "On Approval of the Rules for the Protection of Surface Waters of the Kyrgyz Republic" (2016)** ¹⁷establishes requirements for the prevention of pollution of water bodies, sustainable use of water resources and monitoring of water quality to ensure compliance with established standards.
6. In general, these laws require that environmental impact assessments calculate expected emissions and discharges (including noise) to ensure that a project complies with established environmental standards.

Standard 4: Health, Safety, and Community Security

A. Description of the standard

This Standard recognizes that project implementation may increase impacts on the health, safety, and well-being of local communities. It establishes the responsibility of the implementing party to prevent or, if prevention is not possible, minimize negative impacts on communities caused by project activities. The main objectives of the Standard are:

- predict and prevent risks to the health and safety of local populations at all stages of the project life cycle - both in normal and emergency situations;
- ensure that the security of project sites and personnel is carried out in a manner that respects human rights and does not pose a threat to the safety and rights of affected communities.

The main requirements are classified according to the following areas:

- Designing infrastructure and equipment with safety in mind
- Handling hazardous materials and ensuring their safe storage and use
- Maintaining ecosystem services on which local people depend
- Preventing the spread of infectious and other diseases
- Emergency Preparation and Response

B. National legislation

The protection of public health and safety is enshrined in **the Constitution of the Kyrgyz Republic (2021)** ¹⁸and a number of relevant laws aligned with international standards, including the Performance Standards of the International Finance Corporation.

The Law of the Kyrgyz Republic “On Environmental Protection” (1999) provides for mandatory environmental impact assessment, including an assessment of the potential impact on the health of the local population.

The Law of the Kyrgyz Republic "On Public Health" (2024) ¹⁹establishes the legal basis for disease prevention, sanitary surveillance, and public well-being. It establishes requirements for project developers to comply with public health standards and obtain the necessary permits. The law covers risks associated with air, water, and soil pollution, noise, and the spread of infections.

¹⁵ <https://cbd.minjust.gov.kg/216/edition/10665/ru>

¹⁶ <https://cbd.minjust.gov.kg/4-4286/edition/1259352/ru>

¹⁷ <https://cbd.minjust.gov.kg/98396/edition/856759/ru>

¹⁸ <https://cbd.minjust.gov.kg/1-2/edition/1202952/ru>

¹⁹ <https://cbd.minjust.gov.kg/4-5301/edition/15861/ru>

The Law of the Kyrgyz Republic “On Technical Regulation in the Kyrgyz Republic” (2004)²⁰ establishes mandatory requirements for the safety of buildings, infrastructure and industrial facilities and ensures compliance with construction and technical standards in order to protect the population.

Law of the Kyrgyz Republic "On Civil Defense" (2018)²¹Regulates emergency preparedness, disaster risk management, and population protection from natural and man-made hazards. The law is aligned with international approaches to emergency preparedness.

Law of the Kyrgyz Republic "On Industrial Safety of Hazardous Industrial Facilities" (2016)²²provides for:

- conducting a risk assessment and submitting a safety declaration;
- implementation of technical control systems and accident prevention plans;
- coordination with civil defense authorities;
- informing the public and disclosing information about risks;
- preventing accidents, chemical leaks and other incidents that could affect public health.

The Criminal Code of the Kyrgyz Republic (2021) strengthens the mechanism for liability for violating regulations that pose a threat to health, safety, and environmental sustainability. The law provides for (i) legal liability for harm caused by negligence or violation of safety requirements and (ii) protection of the population from illegal actions or the use of hazardous technologies.

Standard 5: Land Acquisition and Forced Resettlement

A. Description of the standard

This Standard recognizes that the acquisition of land and the imposition of restrictions on its use for project implementation may have negative social and economic consequences. For the purposes of this Standard, forced displacement refers to both **the physical** and **economic** displacement of persons resulting from the acquisition of land or restrictions on its use for project purposes. Key goals Standard:

- Avoid or, if not possible, minimize cases of forced displacement;
- To mitigate negative social and economic consequences;
- Provide compensation in the amount of the full replacement cost;
- Provide support to displaced persons in restoring or improving their livelihoods;
- Ensure the participation of all affected parties, including informal land users;
- Provide access to a complaints mechanism.

The main requirements are classified according to the following areas:

General provisions

- Integrating resettlement issues into the design solution
- Compensation and support measures for displaced persons
- Community engagement and consultation
- Complaint handling mechanism
- Development and implementation of resettlement and livelihood restoration plans

Types movements

- Physical displacement - loss of housing or places of residence
- Economic displacement is the loss of access to livelihoods without physical displacement.

Private Sector Responsibilities in State-Managed Resettlement

- Ensuring that corporate practices comply with obligations to affected persons even when resettlement is carried out through government agencies

²⁰ <https://cbd.minjust.gov.kg/4-1390/edition/1185288/ru>

²¹ <https://cbd.minjust.gov.kg/112554/edition/1267443/ru>

²² <https://cbd.minjust.gov.kg/4-2258/edition/1206916/ru>

B. National regulation

Kyrgyz legislation provides legal grounds for the seizure of property, fair compensation, and the existence of complaint mechanisms.

The Constitution of the Kyrgyz Republic (2021) enshrines the right of private ownership of land and other immovable property in accordance with international principles. Expropriation is permitted only in exceptional cases—for state or public needs, with legal justification and prior, fair compensation.

The Land Code of the Kyrgyz Republic (1999) ²³defines the conditions for the seizure of land plots for state and public needs (**Articles 68–70**). Seizure is permitted only with prior notification, confirmation of public interest, and provision of equivalent compensation.

The Civil Code of the Kyrgyz Republic (1996) ²⁴regulates voluntary land transactions, lease termination, and compensation mechanisms. In the event of property loss, a citizen has the right to full compensation for damages, including lost income, replacement property, restrictions on use, and damage caused by government agencies or third parties (**Articles 14, 15, 993–996**).

The Law of the Kyrgyz Republic “On State Registration of Rights to Real Estate and Transactions Therewith” (1998) ²⁵provides for mandatory state registration of property rights, leases, easements and other rights of use, which ensures legal protection of owners.

The Law of the Kyrgyz Republic “On the Procedure for Considering Citizens' Appeals” (2007) ²⁶guarantees the right of individuals and legal entities to file complaints and appeals in written, oral, or electronic form, including regarding the seizure of land, housing, property, and administrative decisions. This forms the basis of a national complaints mechanism aligned with the requirements of the International Finance Corporation.

Standard 6: Conservation of biodiversity and sustainable management of natural resources

A. Performance standard

This Standard recognizes that biodiversity conservation, maintaining ecosystem services, and sustainable management of natural resources are the foundation of sustainable development. Project activities must consider risks to natural systems and ensure a balance between environmental protection and economic growth. The key objectives of the Standard include:

- protection and conservation of biodiversity;
- maintaining ecosystem services on which people and economic activities depend;
- promoting sustainable management of living natural resources, taking into account environmental and development priorities.

The main requirements are classified according to the following areas:

Protection and preservation biodiversity

- Modified habitats
- Natural habitats
- Critical habitats
- Protected by law and internationally recognized territories
- Invasive alien species

Control ecosystem services

Sustainable control alive natural resources

Chain supplies

- Ensuring sustainable sourcing of natural resources
- Monitoring suppliers' impact on biodiversity

B. National legislation

²³ <https://cbd.minjust.gov.kg/3-5/edition/1285814/ru>

²⁴ <https://cbd.minjust.gov.kg/3-1/edition/1263361/ru>

²⁵ <https://cbd.minjust.gov.kg/160/edition/17554/ru>

²⁶ <https://cbd.minjust.gov.kg/202100/edition/944926/ru>

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In the Kyrgyz Republic, environmental protection, biodiversity and rational use of natural resources are regulated by a number of national laws and regulations, as shown in the table below.

	Legislation of the Kyrgyz Republic
Protection of critical natural areas and biodiversity	- Law of the Kyrgyz Republic "On Environmental Protection" (1999) - Law of the Kyrgyz Republic "On the Animal World" (1999)²⁷ - Law of the Kyrgyz Republic "On Specially Protected Natural Areas" (2011)²⁸
Identification and assessment of risks and impacts on biodiversity	- Law of the Kyrgyz Republic "On Environmental Expertise" (1999) - Resolution of the Government of the Kyrgyz Republic "On approval of the Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic" (2015)
Hierarchy of mitigation measures (prevention, minimization, restoration, compensation)	- General provisions of the Law of the Kyrgyz Republic "On Environmental Protection" (1999) - Resolution of the Government of the Kyrgyz Republic “On approval of the Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic” (2015)
Territories under legal protection and recognized at the international level	- Law of the Kyrgyz Republic "On Specially Protected Natural Areas" (2011)
Conservation of natural ecosystems and ecosystem services	- Law of the Kyrgyz Republic "On Environmental Protection" (1999) - Forest Code of the Kyrgyz Republic (1999)²⁹ - Water Code of the Kyrgyz Republic (2005)³⁰
Management of the spread of invasive alien species	- By-laws in the field of forestry and agricultural regulation
Sustainable management of renewable natural resources (forestry, fisheries and agriculture)	- Forest Code of the Kyrgyz Republic (1999) - Law of the Kyrgyz Republic "On Pastures" (2009)³¹ - Law of the Kyrgyz Republic "On the Development of Agriculture of the Kyrgyz Republic" (2009)³²

Standard 7: Indigenous Peoples

A. Description of the standard

This Standard recognizes that indigenous peoples are often among the most vulnerable and marginalized groups. Their unique social, economic, and legal circumstances often limit their ability to protect their rights and interests with respect to lands, natural resources, and cultural sites. goals Standard include:

- Ensure respect for the human rights, dignity, culture, traditional way of life and aspirations of indigenous peoples during the implementation of projects;

²⁷ <https://cbd.minjust.gov.kg/203262/edition/1205628/ru>

²⁸ <https://cbd.minjust.gov.kg/224/edition/1003931/ru>

²⁹ <https://cbd.minjust.gov.kg/10/edition/2815/ru>

³⁰ <https://cbd.minjust.gov.kg/3-24/edition/1201418/ru>

³¹ <https://cbd.minjust.gov.kg/4-3990/edition/1188200/ru>

³² <https://cbd.minjust.gov.kg/202555/edition/1213000/ru>

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- Avoid negative consequences for indigenous peoples and, where this cannot be avoided, minimize damage and ensure fair and equitable compensation;
- Promote sustainable and culturally appropriate socio-economic benefits for indigenous peoples;
- Ensure an ongoing, transparent and inclusive process of informed consultation and participation at all stages of the project;
- Obtain free, prior and informed consent (FPIC) from indigenous peoples where a project may significantly affect their rights, lands, resources or cultural heritage;
- Respect, preserve and protect the traditional knowledge, cultural values and practices of indigenous peoples.

B. National legislation

The Kyrgyz Republic does not officially define groups as "indigenous peoples" within the meaning of international standards (including criteria for self-identification, the presence of traditional institutions, and a strong connection to ancestral lands). However, current legislation includes provisions ensuring equal rights, the protection of cultural diversity, and access to legal redress.

The Constitution of the Kyrgyz Republic (2021) guarantees equal rights regardless of ethnicity, language, or origin. **The Law of the Kyrgyz Republic "On Culture" (2009)** ³³ The Kyrgyz Republic's legislation aims to preserve the cultural heritage of all ethnic groups, and laws on the state and official languages ensure the protection of linguistic rights. **The Law of the Kyrgyz Republic "On the Procedure for Considering Citizens' Appeals" (2007)** grants all residents the right to file complaints and defend their rights through administrative proceedings. Although the terminology "indigenous peoples" is not used, current regulations partially comply with the International Finance Corporation's Standards for non-discrimination, cultural protection, and participation in decision-making.

Standard 8: Cultural Heritage

A. Description of the standard

This Standard aims to ensure the protection, preservation, and promotion of tangible and intangible cultural heritage that may be affected during project implementation. It recognizes cultural heritage as an integral part of social identity and sustainable development. The main objectives of the Standard are:

- protection of cultural heritage from the negative consequences of project activities and promotion of its preservation;
- ensuring a fair distribution of benefits from the use of cultural heritage elements.

The standard requires that potential impacts on cultural heritage be considered early in the design process, including measures to prevent damage, consultation with stakeholders and, where necessary, adaptation of design solutions to preserve objects of historical, cultural or spiritual significance.

B. National legislation

In the Kyrgyz Republic, cultural heritage protection is regulated by laws aimed at protecting both tangible and intangible assets, including historical sites, traditions, and the cultural identity of ethnic groups. Legislation provides for cultural heritage impact assessments as part of project activities, measures to mitigate negative impacts, and community participation in decision-making. Kyrgyzstan is also a party to international agreements, including the 1972 UNESCO Convention.³⁴

Criteria Standard 8	Legislation of the Kyrgyz Republic
Protection of tangible and intangible cultural heritage	– Law of the Kyrgyz Republic "On Culture" (2009) – Law of the Kyrgyz Republic “On the Protection and Use of Historical and Cultural Heritage Sites” (1999) ³⁵

³³ <https://cbd.minjust.gov.kg/4-3916/edition/788053/ru>

³⁴ <https://whc.unesco.org/en/stateparties/kg>

³⁵ <https://cbd.minjust.gov.kg/4-240/edition/1024648/ru>

Identification and assessment of cultural heritage sites in the project area	– Resolution of the Government of the Kyrgyz Republic “On approval of the Regulation on the procedure for conducting environmental impact assessment in the Kyrgyz Republic (2015) – Law of the Kyrgyz Republic “On Environmental Expertise” (1999)
Mitigation and management of impacts on cultural heritage sites	– Law of the Kyrgyz Republic “On the Protection and Use of Historical and Cultural Heritage Sites” (1999)
Unexpected discovery of cultural heritage sites	– Law of the Kyrgyz Republic “On the Protection and Use of Historical and Cultural Heritage Sites” (1999)
Consulting with communities on cultural heritage issues	- Law of the Kyrgyz Republic "On Culture " (2011)
Respect for the cultural heritage of ethnic and social groups	– Constitution of the Kyrgyz Republic (2021) – Law of the Kyrgyz Republic "On Culture" (2011)
Relocation of cultural heritage sites in exceptional cases	– It is not enshrined in a separate law, but requires the approval and conclusion of the Ministry of Culture, Information, Sports and Youth Policy of the Kyrgyz Republic

Appendix II. Check for Excluded Activities

Activities exempt from risk assessment		
Does the project fall into one of the following categories? <i>Exclusion criteria apply only if they cover <u>the entire scope</u> of the project, and not just one part of it.</i>	Yes	No
• Preparation and dissemination of informational or analytical materials and communication products		
• Organization of events, seminars, trainings		
• Strengthening the capacity of partners to participate in international or national negotiations and conferences		
• Partnership coordination and network management		
• Global/regional/national project without local level activities (e.g. knowledge management, intergovernmental processes)		
Activities that are not eligible for funding ³⁶		
Can project activities include:	Yes	No
• The production or trade of goods, the provision of services, or the implementation of activities that are classified as illegal in accordance with the legislation and regulatory requirements of the Kyrgyz Republic, international conventions and treaties, or are subject to withdrawal from international circulation or prohibition.		
• Activities prohibited by the legislation of the country of project implementation or by international conventions on the protection of biodiversity or cultural heritage;		
• Gambling, casinos, betting facilities, and equivalent enterprises, including those operating on the Internet (online casinos).		
• Manufacture of weapons and ammunition, with the exception of firearms for hunting and sporting purposes.		
• Production of alcoholic beverages, except beer and wine.		
• Growing tobacco, production of tobacco products.		
• Production of or trade in radioactive materials. (This does not apply to the purchase of medical equipment, quality control, or measurement equipment where the radioactive source is considered trivial and has adequate shielding);		
• Production, marketing, and use of asbestos fibers, as well as products or mixtures containing asbestos fibers intentionally added. (This does not apply to the purchase and use of asbestos-cement sheeting where the asbestos content does not exceed 20%).		
• Exploration and production of crude oil.		
• Coal exploration and production, excluding projects aimed at improving energy efficiency and reducing greenhouse gas emissions in the coal mining process.		
• Generation of electricity using coal-fired power plants, with the exception of projects aimed at improving energy efficiency and reducing greenhouse gas emissions during the electricity generation process at such facilities;		

• Trade in wild fauna and flora, including import and export, regulated by the CITES Convention;		
• Activities involving harmful or exploitative forms of forced labor or harmful child labor.		

Loan Officer/Leasing Manager/Islamic Finance Specialist		The signature confirms that he has verified the correctness of the check for excluded activities.
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³⁶ List of Exclusions of the Environmental and Social Policy of Eldik Bank OJSC

³⁷ The UN Minamata Convention on Mercury is dated October 10, 2013 (Minamata Convention on Mercury, an intergovernmental treaty aimed at protecting human health and the environment from anthropogenic emissions and releases of mercury and its compounds (https://minamataconvention.org/sites/default/files/documents/information_document/Minamata-Convention-booklet-rus-full.pdf), imposes restrictions on primary mercury mining. For reference: primary mercury refers exclusively to mercury obtained from mercury ores and does not include by - product mercury obtained during the processing of other metal ores (in which mercury is contained as an undesirable impurity) or secondary mercury obtained from waste.

³⁸ The Convention on International Trade in Endangered Species of Wild Fauna and Flora is dated March 3, 1973 (Convention on International Trade in Endangered Species of Wild Fauna and Flora; an international governmental agreement aimed at ensuring that international trade in wild animals and plants does not threaten their survival; it provides varying degrees of protection for tens of thousands of animal and plant species; <https://cites.org/eng/disc/text.php?gtranslate=ru>; <https://cites.org/eng/app/appendices.php>).

Appendix III. Checklist for Environmental and Social Risk Assessment (simplified)

I		
N		
Industry		
Environmental and social risk category (high, medium, low)		
National legislation	Does the project involve the production or trade of any product or the performance of any activity that is illegal under national law (YES/NO)	
Conditions labor	Does the project finance production or activities related to harmful working conditions or the use of forced/harmful child labor (YES/NO)	
Pollution, pollution prevention and community health	Is the project related to the production of pharmaceuticals, pesticides and herbicides, ozone-depleting substances, polychlorinated biphenyls, wild flora and fauna and products regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (YES/NO)	
	Is the project related to the production and trade of radioactive materials (except for the acquisition of medical equipment, quality control equipment, measuring equipment or any other equipment in which the source of radiation exposure is safe and/or properly protected) (YES/NO)	
	Does the project involve the production or trade of loose asbestos fibres, with the exception of the purchase and use of asbestos-cement sheeting with an asbestos content of less than 20% (YES/NO)	
	Does the project involve the production, trade, storage, or transportation of significant quantities of hazardous chemicals or the c	
Land use	Does the project involve production or activities that violate land rights owned or contested by Indigenous Peoples, without the fully documented consent of the Indigenous Peoples (YES/NO)	
Biodiversity conservation and natural resource management	Does the project involve illegal harvesting, trading, storage, or transportation of timber—including IUCN Red List and CITES species without permits, timber from primary tropical forests, or timber without verification of legal and sustainable origin? (YES/NO)	
	Does the project involve driftnet fishing in aquatic environments u	
Public health and safety and other socio- environmental aspects	I	
	Is the project related to the production and sale of alcoholic beverages (other than beer and wine) (excluding small and medium-sized businesses engaged in retail trade, for which alcohol is a significant part of the trading business, such as grocery stores and restaurants)? (YES/NO)	
	Is the project related to the production and trade of tobacco products (excluding SMEs engaged in retail trade where tobacco is a significant/substantial part of the retail business, such as grocery stores and restaurants)? (YES/NO)	
	Is the project related to the financing of gambling, casinos and similar activities/institutions (YES/NO)	

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Additional comments (if available)	Please list any additional social and environmental aspects (if any) that require corrective action, including the date of implementation of such action.	
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Loan Officer/Leasing Manager/Islamic Finance Specialist		The signature confirms that he has verified the correctness of the check for excluded activities.

Appendix IV Checklist for Environmental and Social Risk Screening
(Question 4 in the full Environmental and Social Risk Screening Questionnaire)

Checklist for Environmental and Social Risk Screening		Answer	
		Yes	No
1. Assessment and management of environmental and social risks and impacts <i>(Questions on environmental and social risks are included in the standard-specific questions below.)</i>			
2. Labor relations and working conditions			
2.1. Could the project be directly or indirectly linked to forced labor and/or child labor?			
2.2. Have there been any serious occupational safety incidents (e.g. fatal accidents or serious injuries) or labor disputes in your organization or projects implemented by your organization over the past 5 years?			
2.3. Is it planned that local residents will be employed in the project?			
3. Resource efficiency and pollution prevention			
3.1 Does the project support trade or use of hazardous chemicals banned or restricted by international agreements, such as persistent organic pollutants or ozone-depleting substances?			
3.2 Does the project use hazardous chemicals and/or generate hazardous waste?			
3.3 Does the project create waste, wastewater or emissions that impact the climate?			
3.4. Does the project have risks due to contaminated soil or groundwater from previous activities on the site?			
3.5. Does the project involve pest control measures or the use of biocides (e.g. their purchase, transportation, storage or disposal)?			
3.6 Does the project require large amounts of energy, water or other resources?			
4. Health, safety and security of the population			
4.1. Could the construction or operation of the project be dangerous for local residents?			
4.2. Could the project be hazardous to people due to the transport, storage, use or disposal of hazardous or noxious materials (e.g. fuels, chemicals or explosives)?			
4.3. Does the project involve the construction of large infrastructure projects such as dams, roads or buildings?			
4.4. Is the project likely to be affected by, or aggravate, earthquakes, landslides, floods or other natural disasters?			
4.5 Does the project involve security personnel who may pose a potential threat to the public due to inadequate training or lack of accountability?			

5. Land seizure and involuntary resettlement		
5.1. Could the project result in temporary or permanent displacement of people (in whole or in part)?		
5.2 Does the project include activities that may cause displacement by restricting people's access to land or natural resources to which they have recognized rights (legally or through local customary practices)?		
5.3. Is there a risk that the project could result in people being evicted against their will?		
5.4. Could the project impact land rights and/or public ownership?		
6. Biodiversity conservation and sustainable management		
6.1. Is the project likely to cause adverse impacts on natural habitats or ecosystems (e.g. loss, degradation, fragmentation, change in water regime)?		
6.2 Is the project located within or near important natural areas, such as nature reserves, national parks or other environmentally sensitive areas, including areas recognized by such local communities or indigenous peoples?		
6.3 Does the project involve major use or modification of water resources, such as construction of dams, reservoirs, or groundwater abstraction?		
6.4 Does the project involve logging, plantation creation, reforestation or large-scale agricultural production?		
7. Local communities with traditional rights to land and resources		
7.1. Does the project plan to work on lands that are traditionally owned or used by local communities with a traditional way of life?		
7.2. Could the project impact land and natural resources to which local communities have traditional or customary access, such as by restricting their use, denying access, or being associated with commercial development of these resources?		
7.3. Could the project seriously impact the cultural heritage of local communities that is important to their identity, rituals or spiritual life, or exploit this heritage for commercial purposes?		
8. Cultural heritage		
8.1. Does the project include activities that may impact cultural heritage (tangible or intangible)—such as historical, archaeological, architectural, or sacred sites, cemeteries, or natural sanctuaries? Could the project restrict access to these sites?		

Statement

Manager of the Sustainable Development Department (ESG)		The signature confirms that he has verified the correctness of the environmental and social risk assessment procedure.
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Appendix V. Gender screening of credit and leasing projects/financing products of Eldik Bank OJSC Gender indicators of the project (quantitative data)

No.	Gender indicators	Data applicant
1	Share of authorized capital owned by women (%)	
3	Quantity employees, including:	
	- women:	
	- men:	

Screening for key gender criteria

		✓ if Yes
	Are women the majority shareholders/participants (more than 51%) or owners of the company?	☐
	Are women included among the recipients of goods and services provided within the framework of the Borrower/Client's activities?	☐
	Are women provided with equal and full access to goods and services provided within the framework of the Borrower/Client's activities?	☐
	Does the proportion of female employees of the Borrower/Client constitute at least 51% of all employees of the Company?	☐
	Does the project contribute to creating new opportunities and improving the quality of life for women?	☐

Interpretation result

Quantity positive answers	Level of Gender Integration (Interpretation)	Marker gender equality
Up to 2 out of 5	The project does not take into account gender aspects. No provides noticeable influences.	GEM 0
2- 3 out of 5	The project is partially sensitive , gender is mentioned but not integrated into the main strategy. Impact limited.	GEM 1
3-4 out of 5	The project takes into account gender aspects and includes measures to improve the status of women.	GEM 2
4- 5 out of 5	The project fully integrates a gender approach . Full impact. Gender equality is the primary/transformational goal .	GEM 3

Gender grade	
Loan Officer/Leasing Manager/Islamic Finance Specialist	

Appendix VI. SEAH Risk Screening and Assessment for GCF-Financed Projects

Risk factors: A “Yes” response indicates the presence of a SEAH risk factor.

SEAH Risk Factors

No.	Question	Yes	No	N/A	Comment
1	Does the financed activity involve the engagement of non-local workers, including migrant and seasonal workers?	☐	☐	☐	☐ Ensuring the availability of a confidential grievance redress mechanism for SEAH issues;
2	Does the financed activity involve work in remote areas, including sites with restricted access or isolated locations?	☐	☐	☐	☐ Ensuring safe living conditions for employees, including separate accommodation for men and women; ☐ Ensuring the availability of separate sanitary and domestic facilities; ☐ Ensuring the availability of a confidential grievance redress mechanism for SEAH issues.
3	Does the financed activity involve worker accommodation in employer-provided housing or temporary lodging facilities?	☐	☐	☐	☐ Ensuring that employees are informed about restricted access areas or prohibited territories;
4	Does the financed activity involve regular travel by workers (e.g., transportation of goods) to remote or hard-to-reach areas, including outside normal working hours? Or will workers be required to travel long and potentially unsafe distances?	☐	☐	☐	☐ Ensuring the availability of a confidential grievance redress mechanism for SEAH issues;
5	Does the financed activity involve the employment of women in predominantly male work environments?	☐	☐	☐	☐ Ensuring the availability of a confidential grievance redress mechanism for SEAH issues; ☐ Ensuring the availability of written procedures for handling complaints regarding SEAH issues;
6	Is the financed activity characterised by high workloads, seasonality, or tight implementation deadlines?	☐	☐	☐	

Loan Officer/Leasing Manager/Islamic Finance Specialist	

Appendix VII. Project risk categorization

Project Information	

QUESTION 1: What potential SEAH risks may arise? <i>Note: Briefly describe the risks if the answers in Table 1 are "Yes." If there are no risks, write "No risks identified," skip to Question 3, and s</i>		QUESTION 2 How serious are the potential SEAH risks? <i>Note: Answer Questions 3 and 4 first, then move on to Question 5.</i>		QUESTION 5: What SEAH risk assessment and management measures have been implemented or are required to address medium and high severity risks?	
Risk number	Risk description	Probability (1 to 5)	Significance (1 to 5)	Comments	
		QUESTION 3: What is the overall risk category of the project?			
		Low risk	☐		
		Medium risk	☐		
		High risk	☐		

Loan Officer/Leasing Manager/Islamic Finance Specialist	

Appendix VIII. Project risk categorization

Project Information

Project Information	

QUESTION 1: What potential environmental and social risks may arise? <i>Note: Briefly describe the risks if the answers in Table 1 are "Yes." If there are no risks, write "No risks identified," skip to Question 3, and s</i>		QUESTION 2 How serious are the potential environmental and social risks? <i>Note: Answer Questions 3 and 4 first, then move on to Question 5.</i>		QUESTION 5: What environmental and social risk assessment and management measures have been implemented or are required to address medium and high severity risks?	
Risk number	Risk description	Probability (1 to 5)	Significance (1 to 5)	Comments	<i>Description of risk assessment and management measures provided for in the design documentation. If an Environmental and Social Impact Assessment is required, all potential impacts and risks should be considered as part of the assessment.</i>
		QUESTION 3: What is the overall risk category of the project?			
		Low risk	☐		
		Medium risk	☐		
		High risk	☐		
		QUESTION 4: What requirements of the Environmental and Social Standards System are applicable taking into account the identified risks and their category?			
		Mark All corresponding points			
		1. Assessment and management of environmental and social risks and impacts	☐		

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	2. Labor relations and working conditions	☐	
	3. Resource efficiency and pollution prevention	☐	
	4. Health, safety and security of the population	☐	
	5. Land seizure and involuntary resettlement	☐	
	6. Biodiversity conservation and sustainable management	☐	
	7. Local communities with traditional rights to land and resources	☐	
	8. Cultural heritage	☐	

Statement

Manager of the Sustainable Development Department (ESG)		The signature confirms that he has verified the correctness of the environmental and social risk assessment procedure.

Appendix IX. Guidance on the assessment and categorization of environmental, social and SEAH risks

Purpose: This guide is intended to assist Bank professionals in assessing the environmental, social and SEAH risks of Bank-financed projects. It describes how to determine the significance level of individual impacts, calculate their overall risk, and assign a project to the appropriate risk category (A, B, or C).

Determining the significance of impacts: The significance of each identified environmental or social impact is determined based on the following **two criteria**:

- **Scale (including nature, scope and duration)** changes in the natural or socio-economic environment, including SEAH issues, expressed, where possible, in quantitative terms. The scale of all impacts is considered from the perspective of the affected parties, taking into account the likely perception of significance determined through stakeholder engagement;
- **Probability (probability of occurrence)** identified impact. This is assessed based on experience or data indicating that a similar result has already occurred in the past.

Hint: Impact Significance = Magnitude × Probability.

Using the risk assessment matrix

To standardize the assessment, **a matrix is used** (see Table 5), where each risk is assessed along two axes:

7. **Probability** (from 1 – very low to 5 – expected)

Score	Level probabilities	Description
1	Very low	Very unlikely, may happen once every 10+ years
2	Low	Unlikely, but possible during the project life cycle
3	Average	It can happen; it happened on similar projects
4	High	Most likely to happen, frequent risk
5	Very high	It will almost certainly happen, it is observed regularly

8. **Impact Significance/Consequences** (from 1 – minor to 5 – critical)

Score	Level significance	Description
1	Minor	Minor impact, easily remedied, no consequences for people/nature
2	Insignificant	Minor, local and short-term effects
3	Moderate	Noticeable impact, requires mitigation measures, complaints possible

Score	Level significance	Description
4	Essential	Serious consequences, including fines, protests, and lengthy recovery
5	Critical	Catastrophic consequences for the environment/population, project termination

Project Risk Categorization

The summary assessment of significance is carried out according to the following principle:

9. **High Risk (Red) - A.** A project with significant potential impacts requiring an Environmental and Social Risk Management Plan and enhanced oversight.
10. **Medium risk (yellow) – B.** Project with impacts requiring mitigation and monitoring measures;
11. **Low risk (green) - C.** A project with low intensity impacts that are easily managed;

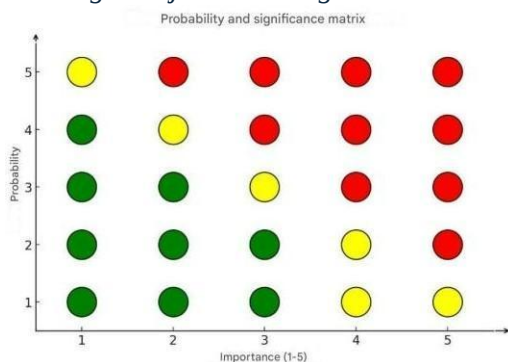
The overall project risk level is determined based on the highest risk level among all individual risks. For example, if one impact has a high risk, the entire project is classified as high-risk.

Practical application

When applying this methodology, specialists must:

12. Complete the assessment table for all key environmental and social risks.
13. Determine the value **for each axis**: probability x impact scale.
14. Use **the matrix** (Figure 3) to determine the significance level.
15. Based on the highest value, determine **the project risk category** (A, B, C).

Drawing 3 Project risk categorization



Overall risk level: green (low), yellow (medium), and red (high)

Appendix X. Templates of the ESRMP and its Implementation Report

The client must compile and systematize the recommendations and actions identified during the screening and formalize them in the form of an ESRMP. This plan will guide subsequent environmental, social and SEAH risk assessment and management activities that may be required if the project to be financed is classified as Category A or B.

When developing the ESRMP, the Client is advised to consider the following aspects:

- Formulate actions concisely, with specific descriptions of the identified activities that need to be carried out.
- When setting deadlines, consider the level of risk associated with the identified gaps.
- Consider interim goals and deadlines to ensure progress can be monitored, especially if the action is complex and may take a long time to implement.
- Identify items (e.g., documentation, audit) in the action list to demonstrate progress or verify completion.
- Measures for the prevention and mitigation of SEAH risks are presented in Appendix VI under the section "Recommended Measures for the Prevention and Mitigation of SEAH Risks." The proposed measures may be incorporated into the ESRMP and shall be subject to further monitoring in accordance with the approved plan.

Table 1 Environmental and Social Risk Management Plan Template

No.	Risk Description	Risk category	Events	Responsible executor	Deadlines	Monitoring schedule

To ensure proper control and monitoring of environmental and social risks, the Client is required to provide a report on the implementation of measures outlined in the ESRMP. The Client is responsible for promptly completing and submitting the report in the prescribed format. This will allow the Bank to track the effectiveness of risk mitigation measures and assess compliance with environmental and social requirements.

Table 2 Environmental and Social Risk Management Plan Implementation Report Template

No.	Risk Description	Risk category	Events	Report on the implementation of the event	Supporting documents	Outstanding actions and deadlines

Appendix XI. List of Abbreviations and Definitions

State ecological expertise	State environmental assessment is the verification of design documentation for compliance with legal requirements.
Affected parties	Individuals and legal entities that may be affected by the project. Impact on affected parties refers to the project's impact on local communities, including displacement, deterioration of living conditions, or the environment.
Invasive alien types	Biological organisms whose spread outside their natural habitat could lead to environmental and social risks, which must be analyzed during the Environmental and Social Due Diligence and taken into account in the development of the Environmental and Social Risk Management Plan. If there is a threat of such species spreading, the bank requires the borrower to develop appropriate measures to prevent, control, or compensate for potential damage.
Exceptions	Activities that are not eligible for bank financing.
Categorization risks	Classification of projects by level of potential impact: A – high risk, B – moderate risk, C – low or no risk.
Covenants	Terms included in the Client's contract requiring the Client to comply with the Environmental and Social Risk Management Plan.
Indigenous peoples	Vulnerable groups possessing a unique ethnocultural, linguistic, territorial, or s
Comprehensive environmental and social due diligence	Environmental and social due diligence is a process used to assess the environmental and social risks associated with a project before a decision is made on whether to provide financing.
Environmental impact assessment	An environmental impact assessment (EIA) is a procedure for assessing a project's potential negative impacts on the environment and local communities. Banks view the availability of a high-quality EIA as a prerequisite for making informed financing decisions, especially for high-risk projects.
Specially protected natural areas	Specially protected natural areas have special ecological, scientific, cultural, or recreational value and are under state protection. When reviewing funding applications, projects involving specially protected natural areas are subject to special scrutiny within the Environmental and Social Risk Management system, including mandatory screening.
International Finance Standards on Environmental and Social Risk	A regulatory framework establishing principles and requirements for assessing environmental and social risks in financed projects. These are used by banks to comply with international sustainable finance standards, minimize credit and reputational risks, and conduct environmental and social assessments.

Methodology for organizing the Environmental and Social Risk Management System at Eldik Bank OJSC, approved by the Order of Eldik Bank OJSC No.149 dated “08” June 2026.

Environmental and Social Assessment (Environmental and Social Screening)	This is a unified procedure for assessing credit, leasing, and financing projects, aimed at identifying potential environmental and social risks. Based on the results of this assessment, an Environmental and Social Risk Category (A, B, or C) is assigned, which determines further risk management requirements.
Environmental and Social Risk Management System	An environmental and social risk management system aimed at identifying, assessing, managing and controlling environmental and social risks.
Environmental and Social Risk Management Plan	Environmental and Social Risk Management Plan — is a management tool developed based on the results of a comprehensive environmental and social audit or environmental impact assessment, which outlines mandatory measures aimed at eliminating, reducing, or controlling significant environmental and social risks of a project. The Bank uses the Environmental and Social Risk Management Plan to monitor the borrower/client's compliance with environmental and social obligations throughout the project lifecycle.
Environmental and Social Risks	Environmental and social risks to the environment or society associated with the activities financed by the Bank. Environmental and social risks are assessed and taken into account when making financing decisions to mitigate reputational and financial risks.
SEAH	A set of unacceptable behaviors, including sexual exploitation (abuse of vulnerability or power for sexual purposes), sexual abuse (physical assault of a sexual nature), and sexual harassment (unwelcome sexual behavior), as well as other forms of gender-based violence.
Sustainable Development Department (ESG)	Sustainable Development Department (ESG) of Eldik Bank OJSC