

Environmental Monitoring Report

Semi-annual Report
June 2016

KAZ: Small and Medium Enterprise Investment Program - Tranche 2

Prepared by JSC Entrepreneurship Development Fund “Damu” for the Asian Development Bank.

This environmental monitoring report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

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Asian Development Bank

Semi – annual Safeguards Monitoring Report

Loan Number

3093 - KAZ

Kazakhstan: Small and Medium Enterprise Investment Program – Tranche 2

Produced by JSC "Entrepreneurship Development Fund "Damu" for the Asian Development Bank

The Framework Agreement on financing (hereinafter – the Agreement) was concluded on May 12th, 2011 between the Government of the Republic of Kazakhstan, Asian Development Bank (hereinafter – ADB) and JSC Entrepreneurship Development Fund “Damu” (hereinafter - the Fund), under which ADB has opened a credit line to the Fund in the form of multi-tranche financing mechanism in the amount of 500 mln. US dollars in order to implement the Small and Medium Enterprise Investment Program.

The agreement was signed for the development of SMEs in the framework of Business Road Map 2020 program through the supporting programs of the Fund, the diversification of economy and creating new jobs.

During the attraction of the 2nd tranche the international consultants hired by ADB together with the employees of the Fund's carried out preliminary verification of financial condition of Participating Financial Institutes (hereinafter – PFI) and examined environmental and social management systems of PFIs (Due Diligence), as a result of which ADB determined the following PFIs:

1. JSC “Bank CenterCredit” – 11.1 billion tenge;
2. JSC “Tsesnabank” – 11.1 billion tenge.

From January 1 to June 30, 2016 the PFIs financed **483** subprojects in the various economic sectors in the amount of **8 474 522 737.7** tenge under 2nd tranche of ADB.

1. JSC “Bank CenterCredit” funded **261** SME subprojects in the amount of **6 315 034 598** tenge, including the following environmental categories of the projects:

Category «C» - 57 subprojects in the amount of 1 461 711 793 tenge

Category «B» - 204 subprojects in the amount of 4 853 322 805 tenge.

2. JSC “Tsesnabank” funded **222** SME subprojects in the amount of **2 159 488 139.7** tenge, including the following environmental categories of the projects:

Category «C» - 218 subprojects in the amount of 2 135 938 694.7 tenge

Category «B» - 4 subprojects in the amount of 23 549 445 tenge.

In January 2016 a corporate training on environmental and social issues entitled “Training for implementation of Environmental and Social Management System” for the regional branches of JSC “Tsesnabank” was conducted by the ADB environmental consultant Bakhtiyar Ibrayev.

Training for regional branches of JSC “Bank CenterCredit” is planned for 2016.

Selected subprojects under the process of screening and evaluation were classified in accordance with the ADB's Safeguard Policy Statement and the laws of the Republic of Kazakhstan for the environment. Financing was allowed to the subprojects that do not have or have a minimum, or site-specific environmental impacts (categories B or C). The subprojects involving involuntary resettlement were excluded from financing. The above-mentioned projects satisfy all national laws and regulations of Kazakhstan and do not involve activities prohibited by ADB. In order to identify and categorize a subproject and check its suitability for financing the check-list was applied.

Annex:

1. Outline of semi-annual safeguards monitoring report by JSC “Bank CenterCredit” for the period from 01.01.2016 to 30.06.2016;
2. Outline of semi-annual safeguards monitoring report by JSC “Tsesnabank” for the period from 01.01.2016 to 30.06.2016.

Deputy Chairman of the Board



Zhashibayev Anuar

OUTLINE OF A SEMI-ANNUAL ENVIRONMENTAL AND SOCIAL PERFORMANCE REPORT FOR PARTICIPATING FINANCIAL INTERMEDIARIES (PFIs)

Name of Organization	JSC Bank CenterCredit		
Completed by (name):	S. Tsoy		
Position in organization:	Head of unit	Date:	22.07.2016
Reporting period	From: 01.01.2016	To: 30.06.2016	

A. Environmental and Social Management System (ESMS)

Policies & Processes	Yes/No	
If there is an ESMS already in place, have there been any updates to the ESMS or policy and procedures adopted by your organization during the reporting period?	No	Procedure of compliance with the Environmental and Social Management System (ESMS) by employees JSC Bank CenterCredit was approved by Decision of Management Board No. 210 dd. 27.05.2013.
Has your organization developed and implemented an ESMS?	No	Changes were not made.
Has your organization appointed staff tasked to implement the ESMS?	Yes	Dauren A. Ashimov – Head of Corporate Business Division of Corporate Finance Department
Please give details of any transactions rejected due to environmental and/or social concerns.	No	Applications being received were not rejected due to environmental and/or social aspects.
Please state any difficulties and/or constraints related to the implementation of the ESMS.	Yes	Environmental and Social Management System operates in the Bank but there is need for advanced training of employees of State Programmes Unit on the issues of ESMS.
Please describe how you ensure that your subproject companies and their subprojects are operated in compliance with the national laws and regulations and applicable ADB's requirements.	Yes	The work is conducted with customers, consultation by request of ADB, all necessary documents are requested.
Please give details of any material social and environmental issues associated with clients during the reporting period in particular.	No	Customers and projects are standard, important environmental and social issues have not been received.
In case the existing ESMS is not fully functional, what is the action plan being implemented by your organization?	Yes	The analysis will be conducted for detecting weaknesses of the existing ESMS, then changes will be made to it taking into account the current legislation of Kazakhstan.
Capacity	Yes/No	
Please provide the name and contact information of the Environmental/Social Officer or Coordinator who has the overall responsibility for the implementation of ESMS.	Yes	Dauren A. Ashimov – Head of Corporate Business Division of Corporate Finance Department
Please provide current staffing of other core ESMS persons in the organization involved with ESMS implementation.	Yes	On 2015 for RM and Credit Analysts of Almaty branch and the employees of Head Office the training was conducted for assessment of environmental and social risks of enterprises – the Bank's borrowers. In 2016 has been planned to hold training for regional branches.
Please provide current staffing of other	Yes	In Head Office – employees of Credit Analysis

core ESMS persons in the organization involved with ESMS implementation.		Division, Corporate Business Division, State Programmes Unit. In branches – RM and Credit Analysts.
What was the budget allocated to the ESMS and its implementation during the year?	No	There is no special budget which is provided under ESMS. The Heads of Administrations are responsible for issues regarding ESMS.
Monitoring	Yes/No	
Do you receive environmental and social monitoring reports from subproject companies that you finance?	No	Under the application submission customers fill in check-lists, according to the data of which we work with customers in respect of financing. During the whole period of the financing instrument validity the branch employees will monitor the customer's activity, which includes monitoring of financial statement, intended use of the loan proceeds, compliance of the project with the current legislation of Kazakhstan and requirements of ADB. The project environmental assessment is controlled according to the Plan of Environmental Management (by projects of category B). There is no need to request reports.
Do you check for ongoing compliance of your subproject companies with national regulation and any other requirements?	Yes	During the whole period of the financing instrument validity the branch employees monitor the customer's activity. Documentary monitoring and on-site monitoring of the activity under the project is performed. During the above actions compliance with the current legislation of Kazakhstan and requirements of ADB is checked.
Please describe how you monitor the subproject company and their subproject's social and environmental performance.	Yes	Visit to the place of the project realization is performed by RM and Credit Analysts of the branch according to all the applications. The visit results are reflected in the Expert conclusion of the project.
Please provide details of any accidents/litigation/complaints/regulatory notices and fines: Any incidents of non-compliance with the applicable Environmental and Social Requirements Covenants/conditionalities imposed by the Bank to the subproject company as a result of any non-compliance	No	Precedents have not been allowed.
Reporting	Yes/No	
Is there an internal process to report on social and environmental issues to senior management?	No	
Do you prepare any social and environmental reports: For other multilateral agencies Other stakeholders E&S reporting in the Annual Report Sustainability reports	Yes	The bank is preparing reports of environmental and social management for IFC. Reports of environmental management for FMO.

Activities on ADB's Prohibited Investment Activities List	
If any, please indicate the dollar percentage of loans or investments out of your total outstanding exposure provided to clients who are substantially involved in ADB's Prohibited Investment Activities List.	0%
If the percentage is not zero, please explain these exposures and any steps having been taken to reduce such exposure.	

B. Subprojects Using ADB Funds

Financed projects economy sector	Projects number	Total amount of loans (tenge)	Categories (C/B)
1-Crop and animal production, hunting and related service activities	51	1 247 976 019	B
18-Printing and reproduction of recorded media	1	18 000 000	C
20-Manufacture of chemicals and chemical products	2	180 000 000	B
21-Manufacture of basic pharmaceutical products and pharmaceutical preparations	2	45 000 000	B
22-Manufacture of rubber and plastic products	5	38 730 000	C
25-Manufacture of fabricated metal products, except machinery and equipment	11	111 621 213	B
26-Manufacture of computer, electronic and optical products	1	17 000 000	B
28-Manufacture of machinery and equipment not elsewhere classified	10	24 887 997	B
31-Manufacture of furniture	2	63 000 000	B
33-Repair and installation of machinery and equipment	15	165 377 030	B
41-Construction of buildings	60	1 006 578 546	B
45-Wholesale and retail trade in cars and motorcycles, and repair	31	1 558 282 000	B
52-Warehousing and support activities for transportation	2	64 159 000	C
55-Services organization stay	13	400 000 000	B
62-Computer programming, consultancy and related services	6	33 600 000	B
64-Financial services, except insurance and pension funding	31	977 282 699	C
71-Activities in the field of architecture and engineering activities; Technical testing and analysis	1	50 000 000	C
72-Research and development	1	17 774 949	C
73-Advertising and market research	2	38 000 000	C
74-Other professional, scientific and technical activities	4	25 500 000	C
75-Veterinary activities	1	5 800 000	C
85-Education	6	170 000 000	C
93-Activities in the field of sports, recreation and entertainment	1	47 465 145	C
95-Repair of computers and personal and household goods	2	9 000 000	C
Total	261	6 315 034 598	

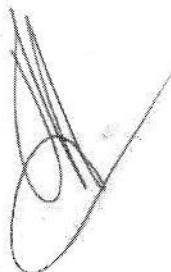
ISSUES	Yes	No	NOTE
<p>A. Compliance with the laws and/or by-laws (for current small and medium-sized enterprises)</p> <p>Have the projects breached any of the applicable environmental, security and health protection laws and by-laws and social laws of the Republic of Kazakhstan?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>B. ADB list of the activity types prohibited for financing.</p> <p>Are types of activities within the project included into the ADB list of the activity types prohibited for financing specified in Annex 1-2 of the Loan Contract concluded with JSC Damu Entrepreneurship Development Fund?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>C. Projects with negative environmental and social affect of high level (Category A)</p> <p>Did the projects proposed for financing have potentially considerable environmental and/or social affect or did they have environmental and/or social risk of high level?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D. Potential social influences			
Projects:			
- Did they use the land which was purchased for public needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- Were they a reason of migration / transition of leaseholders / tenants or unofficial land users (persons without legal rights in land use / those who illegally occupied the land)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- Were they a reason why people lost or would have restricted access to natural resources, constant locality or communal infrastructure?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- Did they directly or indirectly influence ethnic minorities in the project zone, who (i) live collectively in order to clearly determine the place of habitation or inherited territories, (ii) speak their own language or dialect, and (iii) were historically, socially and economically forced off or discriminated.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Were the loans used for:			
• Purchase of the lands, constructions (commercial or residential real estate)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
- Purchase of assets / or business expansion, which will result in eviction / movement of leaseholders, tenants or formal and informal assets users.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>• Purchase of assets which will become the reason why people or certain communities / groups of ethnic minorities or poor people would lose access to:</p> <p>1. Natural resources;</p> <p>2. Constant locality;</p> <p>3. Ordinary activity;</p> <p>4. Communal infrastructure.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>• Purchase of assets / or business expansion, which will result in risk facilitation and increase:</p> <p>1. Breach of labour code standards, including use of child labor;</p> <p>2. Deterioration of situation of the ethnic minorities</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

groups in the area of the project (connected with their personalities, status, subsistence, cultural uniqueness);			
3. Human trafficking.			

C. Sustainable Finance (subprojects with environmental and social benefits) by fund of ADB Programme

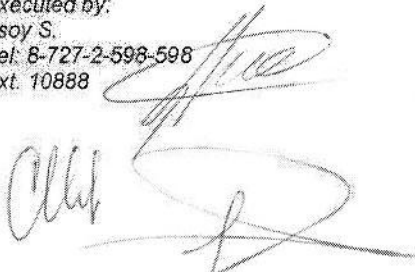
Sustainable finance		
Have you made any investments in subprojects that have social and environmental benefits such as investing in management systems, energy efficiency, renewable energy, cleaner production, carbon finance, pollution abatement and control, sustainable supply chain, corporate social responsibility, community development, etc.? Please list these in the format provided below:		
Subproject Name	Value financed by the Financial Institution (KZT million)	Type of social and environmental benefit
-	-	-

Director of the Corporate
Finance Department



M.M. Nurgazin

Executed by:
Tsoy S.
Tel: 8-727-2-598-598
Ext. 10888



**PROTECTIVE MEASURES MONITORING REPORT
WITHIN THE ADB PROGRAM - TRANCHE II**

Name of Organization	Tsesnabank JSC		
Completed by (name):	Shynar Bissaliyeva		
Position in organization:	Chief Specialist of the Administration for work with state programs of the Department of small and medium entrepreneurship (AWSP DSME)	Date:	July 15, 2016
Reporting period	From: January 1, 2016	To: June 30, 2016	

A. Environmental and Social Management System (ESMS)

Policies & Processes	Yes/No	The Banks' Comments
Have there been any updates to the ESMS or to the policy and procedures adopted by your organization during the reporting period?	No	
Has senior management signed off on the updated policy/procedure?	No	
Has your organization appointed staff tasked to implement the ESMS?	Yes	I. As ESMS Supervisors in the Bank – responsible for implementation of the Environmental and Social Responsibility Policy of Tsesnabank JSC and ESMS coordination by the Order of the Management Board Chairman: 1) the Director of the Department of small and medium entrepreneurship; 2) the Director of the Department of credit risks of business projects are appointed. II. As Responsible Employees for environmental and social issues by the Orders of the Management Board Chairman employees and heads of risk management subdivisions and employees and heads of credit subdivisions of the Head Office/the Bank's Affiliates (171 people) are appointed.
Please give details of any transactions rejected due to environmental and/or social concerns.	No	
Please state any difficulties and/or constraints related to the implementation of the ESMS.	No	
Please describe how you ensure that your subproject companies and their subprojects are operated in compliance with the national laws and regulations and	See the Bank's comment	I. The Bank requests from the client – the initiator – copies of activity authorization documents (if applicable in accordance with normative and legal requirements of RK).

applicable ADB's requirements.		<p>II. The potential borrower completes the screening checklist for above subprojects (Environmental and Social Impact Evaluation Criteria) in accordance with the Annex to the Credit Agreement concluded between the Bank and "Damu" Entrepreneurship Development Fund" JSC; as well as completes an additional questionnaire for Category B Projects which results form for the employees of the Bank conclusions about:</p> <ul style="list-style-type: none"> - acceptability for financing; - necessity to refuse financing; - necessity to receive additional information/documentation for the project; - detected inconsistencies; - necessary actions for elimination of inconsistencies; - recommendations for environmental and social issues obligatory for inclusion into the Environmental Management Plan (EMP). <p>III. The Bank realizes the Monitoring for fulfillment of environmental and social requirements for all financed Category B Projects not less than once in half a year, including the monitoring of the Plan for elimination of violations.</p>
Please give details of any material social and environmental issues associated with clients during the reporting period in particular.	No	
In case the existing ESMS is not fully functional, what is the action plan being implemented by your organization?	See the Bank's comment	In case if the existing ESMS does not operate to the full extent, the Bank will modify it.
Capacity	Yes/No	The Bank's Comments
Please provide the name and contact information of the Environmental/Social Officer or Coordinator who has the overall responsibility for the implementation of ESMS.	See the Bank's comment	<p>As ESMS Supervisors in the Bank – responsible for implementation of the Environmental and Social Responsibility Policy of Tsesnabank JSC and ESMS coordination by the Order of the Management Board Chairman:</p> <p>1) Director of the Department of small and medium entrepreneurship – Tursunkhanov Murat Nauryzbayevich, e-mail address: M.Tursunhanov@TSB.KZ;</p> <p>2) Director of the Department of credit risks of business projects – Rakishev Rustem Maratovich, e-mail address: Rakishev_PM@TSB.KZ. are appointed.</p>
Please describe the training or learning	Yes	I. The realization of corporate training for

activities the Environmental/Social Officer or Coordinator attended during the year.		<p>Responsible Employees for Environmental and Social Issues on the Subject "Training for implementation of Environmental and Social Management System within the Investment Program of the ADB for small and medium entrepreneurship" by ADB Consultant for environmental and social issues Bakhtiyar Ibrayev:</p> <ul style="list-style-type: none"> • in Shymkent, with remote training of employees in Taldykorgan, Kyzylorda, Taraz - on January 12, 2016, • in Aktau - on January 15, 2016, • in Aktobe - on January 18, 2016, • to Uralsk - on January 19, 2016, • in Atyrau - on January 22, 2016, • in Semey, with remote training of employees in Ust-Kamenogorsk, Pavlodar - on January 26, 2016, • in Kokshetau, with remote training of employees in Kostanay, Petropavlovsk, Shchuchinsk - on January 29, 2016.
Please provide information about current staff or other key persons of ESMS in the organization involved in ESMS implementation.	Yes	<p>I. As ESMS Supervisors in the Bank - responsible for implementation of the Environmental and Social Responsibility Policy of Tsesnabank JSC and ESMS coordination by the Order of the Management Board Chairman:</p> <ol style="list-style-type: none"> 1) the Director of the Department of small and medium entrepreneurship; 2) the Director of the Department of credit risks of business projects <p>are appointed.</p> <p>II. As Responsible Employees for environmental and social issues by the Orders of the Chairman of the Management Board the employees and heads of risk management subdivisions and employees and heads of credit subdivisions of the Head Office/the Bank's Affiliates (171 people) are appointed.</p>
What was the budget allocated to the ESMS and its implementation during the year?	See the Bank's comment	<p>There are no traveling expenses connected with carrying out corporate training for employees of Head Office and branches on a topic "An order of ecological and social management system observance within the Investing program of Asian Development Bank on development of small and medium-sized business - Tranche II in Tsesnabank JSC in connection with carrying out of on-site training by ADB's consultant and remote training of other staff of branches of Tsesnabank JSC.</p>

Monitoring	Yes/No	The Bank's Comments
Do you receive environmental and social monitoring reports from subproject companies that you finance?	Yes	The realization by the Bank of the Monitoring for environmental and social requirements for all financed Category B Projects not less than once in half a year, including the monitoring of the Plan for elimination of violations. In this reporting period the due period of the Monitoring has not occurred yet.
Do you check for ongoing compliance of your subproject companies with national regulation and any other requirements?	See the Bank's comment	In accordance with internal documents of the Bank for all projects, not less than once a year, the advanced monitoring with visiting the business site for review of aspects including social and environmental issues is realized. By the decision of the Authorized body of the Bank the period of the Monitoring may be reduced.
Please describe how you monitor the subproject company and their subproject's social and environmental performance.	See the Bank's comment	
Please provide details of any accidents/litigation/complaints/regulatory notices and fines:	No	Such incidents were not observed.

<ul style="list-style-type: none"> - Any incidents of non-compliance with the applicable Environmental and Social Requirements - Covenants/conditionalities imposed by the Bank to the subproject company as a result of any non-compliance 		
Reporting	Yes/No	The Bank's Comments
Is there an internal process to report on social and environmental issues to senior management?	See the Bank's comment	The Responsible Employee of the Administration for work with public programs of the Department of small and medium entrepreneurship (AWSP DSME) maintains reporting on issued credits, concluded contracts and considered projects within the ADB Program with indication of the borrower's name, the project's economic sector and category which is provided on a weekly basis to the ESMS Supervisor (Director of DSME). The Responsible Employee of AWSP DSME also tracks the availability of EMP for Category B Projects.
Do you prepare any social and environmental reports: <ul style="list-style-type: none"> - For other multilateral agencies - Other stakeholders - E&S reporting in the Annual Report - Sustainability reports 	No	

Activities on ADB's Prohibited Investment Activities List	
If any, please indicate the dollar percentage of loans or investments out of your total outstanding exposure provided to clients who are substantially involved in ADB's Prohibited Investment Activities List (Refer to Attachment 1).	0%
If the percentage is not zero, please explain these exposures and any steps having been taken to reduce such exposure.	

B. Subprojects Using ADB Funds

Economy sectors of financed projects	Number of projects	Total amount of credits, tenge	Categories (C/B)
18.12 Other types of print production	18	85 991 184,00	C
25.11 Production of light metal structures	1	30 000 000,00	C

45.31 Wholesale trade in spare parts and accessories to cars	7	230 300 000,00	C
45.32 Retail trade in spare parts and accessories to cars	61	523 159 990,00	C
46.19 Sales agents activity of wide-range goods	6	80 000 000,00	C
46.32 Wholesale trade of meat and meat products	6	14 857 457,74	C
46.33 Wholesale trade of dairy products, eggs, food oils and fats	13	54 906 000,00	C
46.34 Wholesale trade of beverages	25	217 334 000,00	C
46.44 Wholesale trade of porcelain, glasswares and cleaners	7	138 300 000,00	C
46.49 Wholesale trade of other household goods	1	1 703 531,00	C
46.71 Wholesale trade in solid, liquid and gaseous fuel and similar products	6	80 500 000,00	C
46.90 Non-specialized wholesale trade	9	215 108 500,00	C
47.11 Retail trade at non-specialized shops, mainly of food, including beverages, and tobacco products	37	217 550 000,00	C
47.19 Other retail trade at non-specialized shops	1	10 000 000,00	C
47.29 Other types of retail trade of food at specialized shops	9	34 275 000,00	C
47.52 Retail trade of iron-mongery, paintwork materials and glass at specialized shops	7	110 737 809,53	C
47.78 Other types of retail trade of new goods at specialized shops	1	71 428 571,43	C
47.82 Retail trade of clothes, footwear and fabrics in trade tents and in the market	1	12 786 651,00	C

71.12 Activity in the area of engineering surveys and provision of technical consultations in this area	2	7 000 000,00	C
Total for Category C:	218	2 135 938 694,70	
10.13 Production of products of meat and poultry	1	7 826 000,00	B
10.85 Production of prepared foods and semi-finished foods	1	2 362 000,00	B
41.20 Construction of residential and non-residential buildings	2	13 361 445,00	B
Total for Category B:	4	23 549 445,00	
Total:		2 159 488 139,70	

Screening Checklist for Abovementioned Subprojects
Environmental and Social Impact Evaluation Criteria

QUESTIONS	Yes	No	NOTE
A. Observation of the requirements of laws and/or bylaws (for operating small and medium entrepreneurships) Did you violate any of applicable laws and bylaws of the Republic of Kazakhstan about environment protection, security, healthcare and social laws		✓	
B. The ADB's Prohibited Investment Activities List Were the types of activity of subprojects indicated above included into the ADB's Prohibited Investment Activities List specified in Annex 1-2 of the Credit Agreement concluded with "Damu" Entrepreneurship Development Fund" JSC?		✓	
C. Projects with unfavorable environmental and social impact of high level (Category A) Did the projects proposed for financing have a potentially significant environmental and/or social impact or impact presenting high degree environmental and/or social risk?		✓	
D. Potential social impacts			
Projects:			
- Was the land purchased for public needs used for projects?		✓	
- Were the projects the reason of moving / relocating the tenants / renters or non-formal land users (people without legal rights for land use / people who have seized the land illegally)?		✓	
- Were the projects the reason of the effect that people will lose or will have a limited access to natural resources, permanent place of residence or municipal infrastructure?		✓	
- Did the projects have impact on ethnic minorities in the project area which (i) support collective organization for precise determination of their place of residence or inherited territories, (ii) speak in their language or dialect, and (iii) were historically, socially and economically		✓	

separated or discriminated.			
Were credits used for:			
• Purchase of land, structures (commercial or residential real estate)		✓	
- Purchase of assets and/or expansion of business that will lead to departure / relocation of tenants, renters or formal and non-formal users of assets.		✓	
• Purchase of assets that will become a reason of the effect that people or certain communities / groups of ethnic minorities or poor people will lose access to: 1. natural resources; 2. permanent places of residence; 3. regular activity; 4. municipal infrastructure		✓	
• Purchase of assets and/or business expansion that will lead to promotion and increase of the risk of: 1. violation of standards of labor code, including child labor use; 2. lag of the groups of ethnic minorities in the area of project implementation (connected with their personality, title, nutrition system, cultural singularity); 3. trafficking in people.		✓	

C. Sustainable Finance (subprojects with environmental and social benefits) at the expenses of ADB Program funds

Sustainable finance		
Have you made any investments in subprojects that have social and environmental benefits such as investing in management systems, energy efficiency, renewable energy, cleaner production, carbon finance, pollution abatement and control, sustainable supply chain, corporate social responsibility, community development, etc.? Please list these in the format provided below:		
Subproject Name	Value financed by the Financial Institution (tenge)	Type of social and environmental benefit
-	-	-

Deputy Chairman of the Management Board



A. Djailaubekova