

Kınalı-Malkara Motorway Project

Resettlement Policy Framework (RPF)

Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.

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Abbreviations

Abbreviation	Definition
BOT	Built-Operate-Transfer
BOTAŞ	Petroleum Pipeline Corporation
ÇOK A.Ş.	Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.
ÇORDAŞ	ÇORDAŞ Çorlu Natural Gas Distribution Company (ÇORDAŞ)
CIMER	The Presidency's Communication Centre of Türkiye
CLO	Community Liaison Officer
DSI	State Hydraulic Works
E&S	Environmental and Social
EP	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
ESIA	Environmental and Social Impact Assessment
EUR	Euro
GAZDAŞ	GAZDAŞ Trakya Natural Gas Distribution Company
GBVH	Gender-Based Violence and Harassment
GEM	GEM Sustainability Services and Consultancy Inc.
GIS	Geographical Information System
GLAC	Guide to Land Acquisition and Compensation
HH	Household
HSE	Health, Safety, Environment
IFC	International Finance Corporation
IFIs	International Financial Institutions
ISKI	Istanbul Water and Sewerage Administration
KGM	Directorate General of Highways
KM	Kınalı – Malkara
KÖSOB	Public – Private Partnership Regional Directorate
LESA	Lender's Environmental and Social Advisor
Limak	Limak İnşaat Sanayi ve Ticaret A.Ş
MC	Malkara – Çanakkale
MERNIS	Central Civil Registration System

Abbreviation	Definition
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTI	The Ministry of Transport and Infrastructure
MoU	Memorandum of Understanding
MSF	Motorway Service Facilities
NATO	North Atlantic Treaty Organization
NGO	Non-governmental Organisation
NVI	Population and Citizenship Affairs System
O&M	Operation & Maintenance
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Lines
PAP	Project Affected Person
PPP	Public Private Partnership
PSs	Performance Standards
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TBD	To be determined
TEIAS	Turkish Electricity Transmission Company
TESKI	Tekirdağ Water and Sewerage Administration
TKGM	General Directorate of Land Registry and Cadastre
TREDAŞ	Trakya Gas Distribution Company
UEDAŞ	Uludağ Gas Distribution Company
UYAP	National Judiciary Informatics System

Executive Summary

This **Resettlement Policy Framework (RPF)** has been prepared for the **Kınalı – Malkara Motorway Project** (the Project or **KM Section**) of **Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş.)**, a joint venture of Limak İnşaat Sanayi ve Ticaret A.Ş. (Limak, an affiliated company of Limak Holding) and Yapı Merkezi of Türkiye and Daelim and SK of South Korea. ÇOK A.Ş. serves as the Special Purpose Vehicle (SPV) for the Project – **with Limak being the sole sponsor for KM Section** – and is also referred to as the Project Company, Appointed Company, or the Company throughout this Report.

The RPF was prepared by GEM Sustainability Services and Consultancy Inc. (GEM), the **Resettlement Action Plan (RAP) Consultant** appointed for the Project by the **Limak İnşaat Sanayi ve Ticaret A.Ş.** on 20 October 2025. The RPF will be expanded into a specific RAP once the information required for its preparation – specifically the expropriation plans and lists for the Project¹ – becomes available.

The SPV has approached international financial institutions (IFIs) and commercial banks (referred to collectively as potential “lenders”), to finance the Project. Accordingly, this RPF has been developed in accordance with the following standards of the potential lender groups (the “applicable international standards”):

- International Finance Corporation (IFC) Performance Standards (PSs) (2012),
- Equator Principles (EP) 4 (2020), and
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the “Common Approaches” adopted in 2012 and revised by the OECD Council in 2016 and 2024).

In parallel with this RPF study, a consultancy firm is undertaking an Environmental and Social Impact Assessment (ESIA) process for the Project.

The Project under the Build-Operate-Transfer (BOT) Model

The **Kınalı – Malkara Motorway (KM Section)** is a sub-set of the broader **Kınalı–Tekirdağ–Çanakkale–Savaştepe Motorway Project**. The Malkara – Çanakkale Section (including 1915 Çanakkale Bridge) of the Kınalı-Savaştepe Motorway (the “**MC Section**”), was tendered by the Directorate General of Highways (“KGM”) in January 2017 and the consortium comprising of DL E&C Co. Ltd., Limak İnşaat Sanayi ve Ticaret A.Ş., SK ecoplant Co., Ltd. and Yapı Merkezi İnşaat ve Sanayi A.Ş. was awarded the tender. Upon award of the tender, the consortium established the Project Company and an Implementation Contract was signed between the Project Company and the KGM on **21 March 2017** (the “**Implementation Contract**”) and MC Section was officially inaugurated on **19 March 2022**.

The **Kınalı – Malkara Motorway** is located in **İstanbul** and **Tekirdağ** provinces and traverses the boundaries of **5 districts** (Silivri in İstanbul and Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara in Tekirdağ) and **39² neighbourhoods**. It has a **total length of approximately 146 km**, encompassing both the **main Motorway (105 km)** and **connection roads (41 km)**. It is planned as a dual carriageway with **2x3 lanes** for the **main Motorway**, and **2x2 lanes** for the **connection roads**. The Project consists of three sections:

- **Section 1:** KM 0 – 35
- **Section 2:** KM 35 – 70
- **Section 3:** KM 70 – 105

¹ The expropriation plans and lists for parcels affected by the Project's current alignment have been conducted in accordance with the technical specifications of the KGM. These activities have been carried out by a certified national engineering firm (“**valuation contractor**”), appointed by the SPV and approved by the Directorate General of Highways (KGM).

² The accelerated expropriation decision for the Project initially covered 38 neighbourhoods; however, Mahramlı Neighbourhood of Tekirdağ, Malkara indicated in the decision is not affected by the Project's land acquisition according to the current expropriation plans. According to the current expropriation lists, two additional neighbourhoods from Marmaraereğlisi – Sultanköy and Cedit Ali Paşa – have been added, bringing the total number of affected neighbourhoods to 39.

The KM Section is intended to be included within scope of the Project Company's appointment under the Implementation Contract as an **additional work** to the MC Section. The Project Company and the KGM signed a **memorandum of understanding ("MoU")** in September 2022, governing the terms and conditions of undertaking the KM Section as an additional work. The MoU includes an annex setting out the amendments to be made to the Implementation Contract in respect of the KM Section.

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as **36 months** following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date. The SPV targets to finalise and execute the financing documents by the end of 2025. Consequently, construction works are planned to commence in **January 2026**.

The Project is a public-private partnership (**PPP**), with the granting authority being the **Republic of Türkiye Ministry of Transportation and Infrastructure (MoTI)**, represented by the **Directorate General of Highways (KGM)**. ÇOK A.Ş. acts as the private partner under the BOT Contract.

Within the context of the BOT model, the granting authority, KGM, is responsible for executing the expropriation works required for the Project in accordance with the Expropriation Law (No. 2942, 1983) of Türkiye and based on the **Public Benefit Decision** declared by the MoTI on **6 July 2022**. The SPV, as the private partner, is responsible for the design, construction, financing, operation and maintenance of the Project until its transfer to KGM.

Overview of Potential Displacement Impacts

The Project affects **privately-owned, state-owned (public parcels** including treasury including pasture, forestry, non-registered, etc.) and **legal entity parcels** (such as municipalities, public corporations, associations, foundations, etc.) within Motorway's **expropriation corridor**.

There will be also other temporary construction facilities, such as construction camp sites, storage sites, plant sites (such as concrete plant, asphalt plant, mechanical plant, etc.) that will lead to impact on lands.

The key figures related to displacement impacts of the Project within the Motorway's expropriation corridor as per the current expropriation data are summarised **in the table below**. Measures taken by KGM and the SPV for avoidance and minimisation of Project-related displacement impacts are detailed in this RPF and subsequent RAP.

Ownership	Total Expropriation Area (m ²)			Number of Parcels			
	Section 1 KM 0-35	Section 2 KM 35-70	Section 3 KM 70-105	Section 1 KM 0-35	Section 2 KM 35-70	Section 3 KM 70-105	Total
Private	5,821,604.81	6,119,678.00	3,097,791.79	1,069	749	439	2,257
State (Public)							
Treasury	28,820.15	65,364.00	17,666.10	27	8	21	56
Pasture	94,988.37	24,511.00	247,661.53	4	3	7	14
Forestry	0.00	0.00	923,514.14	0	0	27	27
Non-registered	74,666.23	261,455.00	43,027.41	16	32	17	65
Roads ³	117,985.24	547,421.00	83,116.90	86	67	41	194
Legal Entity	4,250.69	163,409.00	70,743.41	6	20	9	35
Total – Section-based	6,142,315.49	7,181,838.00	4,483,521.28	1,208	879	561	2,648
Grand Total	17,807,674.77 m²			2,648 parcels			

Note: These figures are based on current version of the expropriation plans and may change. Final confirmation is awaited from KGM and final figures will be presented in the RAP.

Construction Overview

³ These are cadastral roads located along the route and fall within the expropriation corridor. They will be expropriated and will then be transferred to the KGM.

On **18 March 2025**, a **groundbreaking ceremony**⁴ was held for the Kınalı – Malkara Motorway Project on parcels that were expropriated for the 1915 Çanakkale Motorway and Connection Roads Project. Apart from the site preparations made for the ceremony, site mobilisation and construction works for the Project have **not** yet started.

In line with the construction schedule agreed with KGM, site mobilisation for Project construction is planned to commence in **January 2026** and progress lot by lot, on parcels where the land acquisition process has been completed – whether through purchase or expropriation for privately owned parcels, or through allocation of state-owned parcels to the Project.

The Engineering, Procurement, and Construction (EPC) Contractor is yet to be officially appointed by the SPV for the Project.

Land Acquisition Overview

The decisions and decrees issued by the relevant national authorities regarding the expropriation works to be carried out within the scope of the Project are as follows:

- The **Public Benefit Decision** (No: 2022/138) for the Project was declared by the **MoTI** on **6 July 2022**.
- A **Presidential Decree (No. 7060, Date: 12 April 2023)** concerning the **Accelerated Expropriation** of certain immovable properties under the scope of the Project (located within the settlements covered by the Decree) by the KGM in line with Article 27 of the Expropriation Law of Türkiye (Law No. 2942, 1983) was published⁵ in the Official Gazette (No. 32162) on **13 April 2023** (referred to as **Accelerated Expropriation Decision**).

The census, inventory of assets and valuation (field identification) works for parcels affected by the Project's current alignment have been conducted in accordance with the technical specifications of the KGM. These activities have been carried out since April 2024 by a certified national engineering firm ("**valuation contractor**"), appointed by the SPV and approved by KGM.

Based on the Accelerated Expropriation Decision, KGM has the authority to initiate accelerate expropriation court proceedings (**Article 27**) in line with the construction schedule and subject to the availability of the expropriation budget for compensating right holders. However, **in this Project, KGM has prioritised negotiated settlements through the Article 8 process (purchasing method)** under the Expropriation Law. Accordingly, KGM has started inviting all owners and shareholders, including heirs⁶, to participate in Article 8 negotiations and Article 27 is used by KGM as a last resort, only after Article 8 negotiations and consultations with the rightful owners and shareholders have been held and failed, or if they do not attend the reconciliation negotiations despite the consultation efforts made.

The expropriation process for the Project **was initiated by KGM in 2024** through the issuance of initial Article 8 invitations and the conduct of negotiation meetings with participating owners and shareholders. It progresses lot by lot in each section, in line with the availability of the expropriation budget and the construction programme.

For Lot **KM 81+360 – 88+300**, expropriation procedures – including court proceedings and the transfer of title deeds to KGM – **have been completed**. Considering the construction schedule of the Project, Article 27 **was not applied by KGM to date**. Instead, Article 10 was implemented in cases where Article 8 agreement protocols could not be signed with the right holders.

The status of the expropriation of private parcels – including agreement and court case rates – is provided in the RPF – Section 2.7.

⁴ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/OtoyolProjeleri/KinaliMalkara.aspx>

⁵ <https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf>

⁶ As a standard practice, KÖSOB identifies deceased persons and their heirs through the Central Civil Registration System (MERNIS) and Population and Citizenship Affairs System (NVI) sends Article 8 notifications to invite them to participate in the negotiations.

Environmental and Social Due Diligence (ESDD) Process

In **October 2024**, the Lenders retained an Independent Environmental and Social (E&S) Advisor (Lender's E&S Advisor – **LESA**) to carry out Environmental and Social Due Diligence (ESDD) for the **KM Section** and to conduct an independent review of the ESIA disclosure package – including the RFP and RAP – in accordance with the applicable international standards, prior to public disclosure and to evaluate the compliance of land acquisition activities with the standards and requirements of the Lenders.

As part of the ESDD, the LESA issued an **Environmental and Social Action Plan (ESAP)** on 26 February 2025, and an ESAP Status Tracker on 23 March 2025. The tracker includes the following action item related to the RAP.

According to the ESAP Status Tracker;

- A Resettlement Policy Framework (RPF) is required to be **publicly disclosed prior to financial close or before commencement of construction**, whichever comes first,
- **RAPs should be disclosed once prepared.**

The RPF Implementation and Resettlement Action Plan (RAP) Development

Following the approval of this RPF by the Lenders and the LESA, the SPV will begin implementing its key principles. In parallel with the implementation of the RPF, a **RAP will be prepared in line with the IFC PS5 and other applicable international standards, and in accordance with Project ESAP requirements.**

The RAP will identify individuals who will be physically and economically displaced and establish eligibility criteria and entitlements for the compensation of losses and impacts under a detailed **Entitlements Matrix**. It will also outline **livelihood restoration, improvement, and assistance measures** to be provided to the owners and users of the affected lands and structures including houses. These entitlements and measures will be in addition to the compensation provided by KGM in accordance with the Expropriation Law through KGM's Expropriation Budget.

The additional costs associated with RAP implementation will be covered by the SPV through a **RAP Fund, which will be allocated and managed by the SPV** – separate from KGM's Expropriation Budget.

The RAP will be implemented by the SPV in collaboration with KGM. The RAP implementation period will cover a duration of **36 months, commencing from the approval of the final RAP by the Lenders.** The final RAP will be disclosed by the SPV on the Project's official website.

As part of RAP implementation, the SPV will provide **livelihood restoration, improvement, and assistance measures** to Project-affected people (PAPs), to enable them to restore – and where possible, improve – their livelihoods in the post-land acquisition period. The SPV will also **engage** with the PAPs on an ongoing basis, as outlined in this RFP and the subsequent RAP.

The SPV will pay specific attention to **vulnerable individuals and households** and provide tailored assistance in line with the principles outlined in the RAP. **In-kind support** will be provided by the SPV to the vulnerable households. The identification of vulnerable individuals and households will be initiated as part of the RAP studies and households to be provided with support will further be determined (depending on their vulnerability levels) by the SPV **during RAP implementation.**

The SPV will provide regular updates to KGM on RAP implementation through monthly progress reports and, where needed, on a case-by-case basis via correspondence and/or meetings. The SPV will continue to engage with KGM throughout the Project as necessary to support effective RAP implementation.

The RAP will be a living document and will be updated as necessary throughout its implementation.

RAP Monitoring

RAP implementation will be periodically monitored both internally by the SPV and externally by the Lenders and their LESA to assess progress and identify any areas where improvements or corrective actions may be required. The frequency of internal and external RAP monitoring and reporting will be **quarterly during RAP implementation**, which will largely coincide with the RAP implementation period, and **bi-annually** (once every 6 months) during post-implementation until RAP Completion Audit.

Following the completion of RAP implementation period, post-implementation monitoring will be conducted by the SPV for approximately two years and reported to Lenders, until a **RAP Completion Audit** will be carried out by independent resettlement specialists – with approval from Lenders.

Stakeholder Engagement and Grievance Mechanism for Land Acquisition related Grievances/Feedback

The Project has a **Stakeholder Engagement Plan (SEP)** which also describes consultation and information dissemination activities regarding land acquisition and resettlement. The Project SEP has been disclosed at the Project website⁷.

The RAP to be developed will include a dedicated **RAP Disclosure and Engagement Action Plan** for disclosure and implementation phases. This Plan will be implemented in alignment with the Project SEP.

The Project-specific Grievance Mechanism, as outlined in the Project SEP, will be activated by the SPV in accordance with applicable international standards. This mechanism will remain accessible to all stakeholders – including owners, shareholders, and users of affected lands and structures – throughout the construction and operation phases of the Project.

KGM, as the authority responsible for expropriation, also collects and manages all complaints, objections, and feedback related to land acquisition in line with its official procedures. Stakeholders can submit land acquisition-related complaints and feedback to KGM through KGM's institutional grievance channels⁸, which will remain operational in parallel with the Project's grievance mechanism.

Guide to Land Acquisition and Compensation (GLAC)

A **Guide to Land Acquisition and Compensation (GLAC)**, providing a concise, clear, and non-technical summary of the RAP, will be prepared by the Project following the completion of draft RAP. Following its approval by the Lenders, the GLAC will be distributed to and presented to affected people to ensure they are fully informed about the land acquisition process, their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements.

Roles and Responsibilities for RAP Implementation

The BOT Contract defines the land acquisition related responsibilities of KGM, along with the contractual responsibilities of the SPV.

The SPV holds contractual responsibilities for covering a portion of the Expropriation Cost and acquiring land use rights and permits for temporary or permanent facility sites, where such sites are located outside the Project's expropriation corridor. **The SPV is responsible for implementing the RPF and RAP** in collaboration with KGM.

The SPV will set up a dedicated **RAP Implementation Team** responsible for the day-to-day delivery of RAP measures.

KGM has a **Public – Private Partnership Regional Directorate (KÖSOB – Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü)** headquartered in Bursa Province⁹. The Project falls within the responsibility area of the KÖSOB. For regular Project management issues, the SPV's RAP Implementation Team will coordinate and collaborate closely with this Directorate.

⁷ <https://www.1915canakkale.com/cmsfiles/Galleries/18348/stakeholder-engagement-plan.pdf>

⁸ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx>

⁹ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx>

The SPV will submit and present the RPF and RAP to KGM (in Turkish) following approval of the documents by the Lenders. The SPV will keep the Lenders informed about this process, provide relevant documentation on the communication and meetings with KGM, and share any verbal or written feedback received from KGM, if any. Any feedback from KGM on the RPF and RAP will be incorporated into the documents, as appropriate, in consultation with and subject to the approval of the Lenders.

Through monthly construction progress reports, the SPV will keep KGM informed about the RAP implementation progress and compensation and assistance provided through the RAP Fund. Specific requirements of KGM, if any, will be taken into consideration through a consultative process. KGM – through KÖSOB – has been supporting the SPV and the RAP Consultant Team with the provision of land acquisition data necessary for RPF preparation and will continue to support them with the timely and sufficient delivery of necessary data (e.g. land acquisition, grievance management, and organisational capacity, among others) for RAP preparation and implementation without any delay or restriction.

Budget (RAP Fund)

The SPV will allocate and manage a RAP Fund – separately from the KGM's Expropriation Budget – to finance the costs associated with the implementation of RAP measures that are not covered under national legislation, as well as to provide for the human resources required to ensure effective implementation.

The key budget items under the RAP Fund are listed below, and each budget item includes sub-items in accordance with the entitlements and assistance outlined in this RPF.

- Top-up Cash Compensation to cover Depreciation Cost of residential and non-residential structures on affected lands (for structure owners)
- Cash Compensation to cover Replacement Cost for owners of Informal Structures on public or private lands
- Crop payments (in case land is entered prior to harvest)
- House Relocation Support Package and Moving Allowance
- Business Relocation Support Package and Moving Allowance (in case businesses are affected)
- Livelihood Restoration Plan (LRP) Fund
- Vulnerable Groups Fund
- Small Costs Fund
- Governance and Administrative Costs for human resources, equipment and materials, and consultancy services required to support RAP implementation
- External RAP Monitoring including RAP Completion Audit
- Contingency Fund

The indicative budget for RAP implementation through the RAP Fund will be calculated as part of the RAP, based on the valuation reports for the affected lands and structures, which will be obtained by the SPV from KGM once they become available during RAP preparation.

1. Introduction

This **Resettlement Policy Framework (RPF)** has been prepared for the **Kınalı – Malkara Motorway Project** (the Project or **KM Section**) of **Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş.)**, a joint venture of Limak İnşaat Sanayi ve Ticaret A.Ş. (Limak, an affiliated company of Limak Holding) and Yapı Merkezi of Türkiye and Daelim and SK of South Korea. ÇOK A.Ş. serves as the Special Purpose Vehicle (SPV) for the Project – **with Limak being the sole sponsor for KM Section** – and is also referred to as the Project Company, Appointed Company, or the Company throughout this Report.

The Project is a public-private partnership (**PPP**), with the granting authority being the **Republic of Türkiye Ministry of Transportation and Infrastructure (MoTI)**, represented by the **Directorate General of Highways (KGM)**. ÇOK A.Ş. acts as the private partner under the BOT Contract.

The Kınalı – Malkara Motorway Project is implemented under an **Amendment** to the BOT Contract of the 1915 Çanakkale Motorway and Connection Roads Project.

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as 36 months following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date.

The SPV targets to finalise and execute the financing documents by the end of 2025. Consequently, construction works are planned to commence in **January 2026**.

The SPV has approached international financial institutions (IFIs) and commercial banks (referred to collectively as potential "lenders"), to finance the Project. Accordingly, this RPF has been developed in accordance with the following standards of the potential lender groups (the "applicable international standards"):

- International Finance Corporation (IFC) Performance Standards (PSs) (2012),
- Equator Principles (EP) 4 (2020), and
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the "Common Approaches" adopted in 2012 and revised by the OECD Council in 2016 and 2024).

The RAP has been developed based on a comprehensive review of expropriation data compiled by the engineering firm appointed by the SPV, with the approval of KGM, in accordance with the Expropriation Law and KGM Technical Specifications, and the outcomes of the RAP fields surveys conducted in May 2025, as outlined in Chapter 4. **The RAP is a living document and will be updated, as necessary throughout the implementation period.**

In parallel with the RPF/RAP studies, a national consultancy firm is undertaking an Environmental and Social Impact Assessment (ESIA) process for the Project.

The Project structure and key stakeholders, as defined under the BOT Contract and the prospective Finance Agreement, are summarised in Figure 1-1.

According to this structure, the MoTI, specifically the KGM, is positioned at the top as the Contracting Authority. KGM is responsible for executing project-related land acquisition and expropriation in accordance with the Expropriation Law of Türkiye, as well as completing the permitting processes in line with applicable legislation. The SPV under the BOT Contract will appoint an EPC Contractor, which in turn will contract and manage the activities of construction subcontractors. The SPV maintains consultancy agreements with key technical partners, including the ESIA Consultant, the RPF/RAP Consultant (GEM), and site implementation partners, and the prospective lenders are supported by their own E&S Advisor (Lender's E&S Advisor – LESA. A separate engineering firm (valuation contractor) has been appointed by the SPV, with the approval of KGM, to prepare expropriation plans and conduct the valuation works required under the Expropriation Law of Turkey (Law No. 2942, 1983).

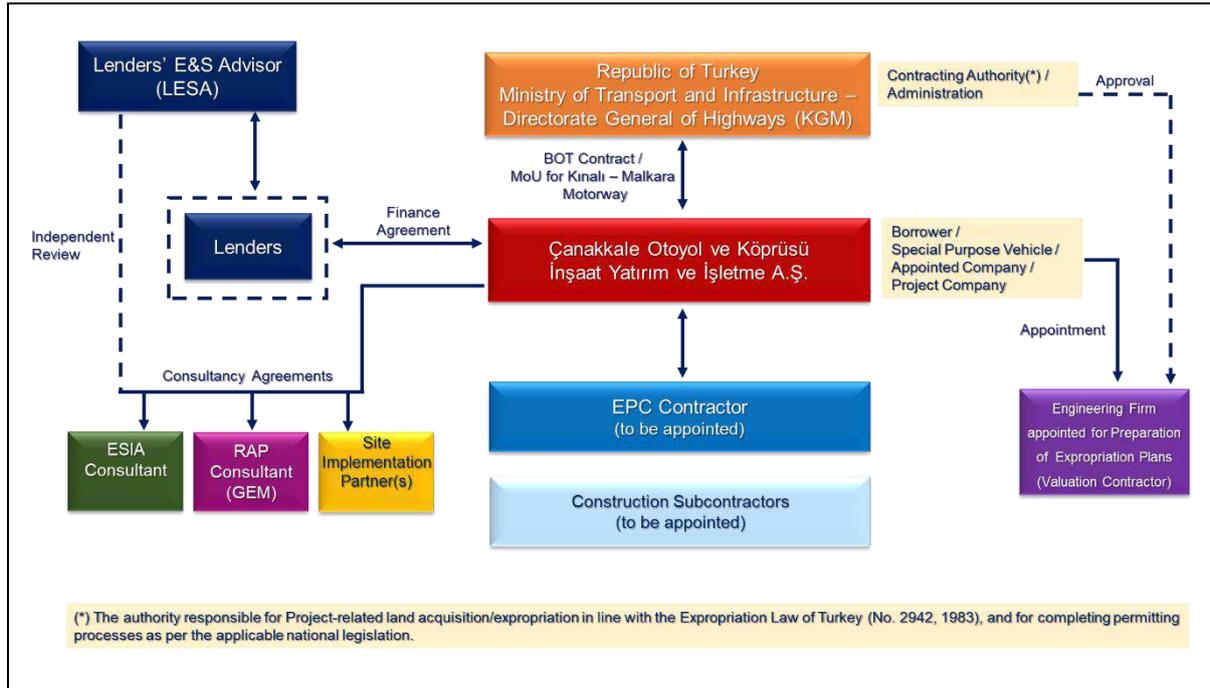


Figure 1-1. Project Structure and Key Stakeholders as defined under the BOT Contract and the Prospective Finance Agreement

The key Project milestones relevant to RAP are presented in Figure 1-2.

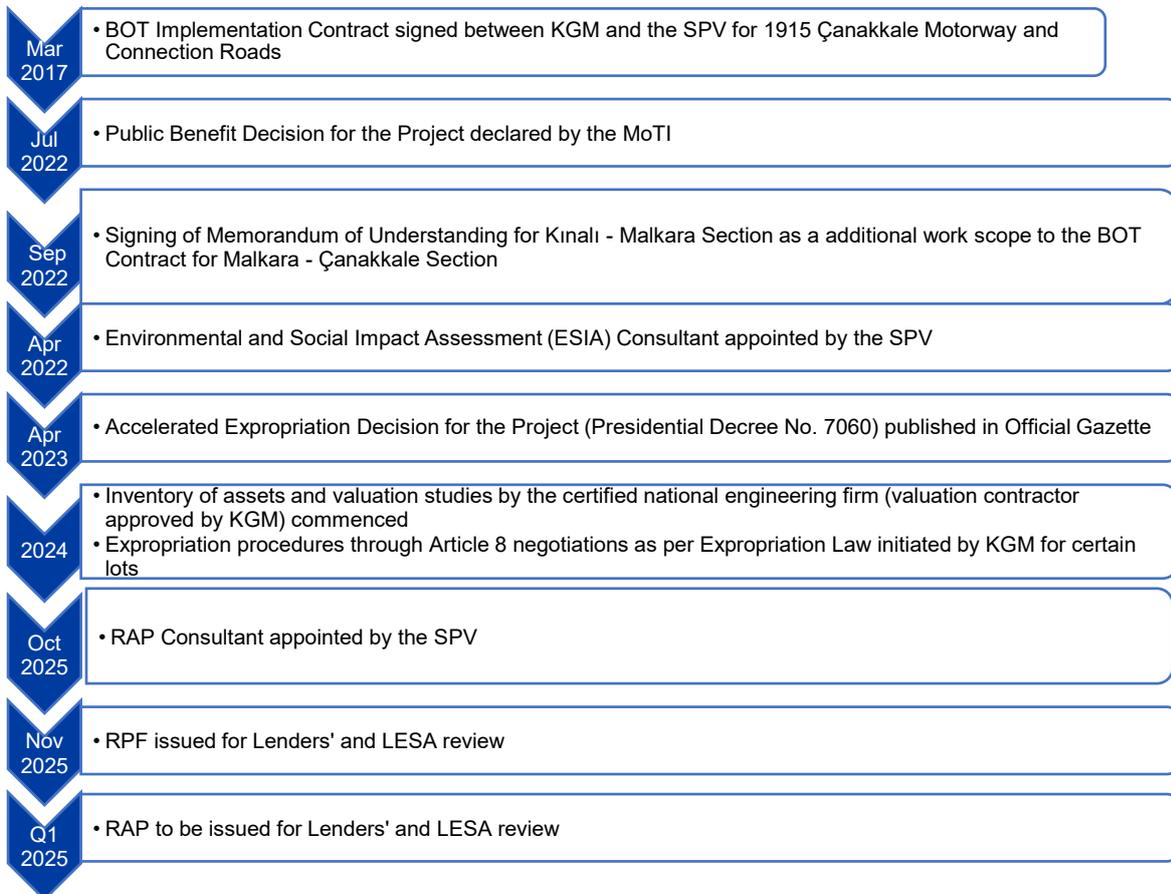


Figure 1-2. Key Project Milestones Relevant to RAP

2. Project Description

The **Kınalı–Malkara Motorway** is planned as a segment of the **Kınalı–Tekirdağ–Çanakkale–Savaştepe Motorway**, aiming to offer uninterrupted transportation from **Istanbul to Çanakkale**. The route starts from the **Kınalı Junction** on the **Istanbul–Edirne O-3 Motorway** and extends westward. It passes north of **Tekirdağ**, follows the northern part of **Şarköy**, and reaches **Malkara**. From there, it connects with the **Malkara–Çanakkale Motorway** and the **1915 Çanakkale Bridge**, which was officially inaugurated on March 18, 2022.

Along the motorway route, **interchanges** have been designed at **nine** locations. Additionally, to serve nearby settlements and ensure connections to the state road located to the south, connection roads have been planned. The current Project route is shown in Figure 2-1.

Table 2-1 provides a summary of Project's key components. The design speed is 140 km/h on the main carriageway and 110 km/h on the connection roads. List of engineering structures (bridges, overpasses, underpasses and culverts) with their locations will be provided in the RAP.

Table 2-1. Summary of Key Project Components

Component	Information according to Current Design
Length of the Motorway	105 km Main Road + 41 km Connection Roads
Cross Sections	Main Motorway: 2x3 lanes Connection Roads: 2x2 lanes
Interchanges	9 (Kınalı-Silivri, Çanta, Marmara Ereğlisi, Çorlu Airport, Karatepe, Tekirdağ East, Tekirdağ, Hayrabolu, Tekirdağ West)
Overpasses	60 (*)
Underpasses – Portal	28 (*)
Underpasses – Girder	13 (*)
Culverts	218 (*)
Operation and Maintenance Centre	KM 60+000
Salt Depots	KM 16+000 KM 83+000
Motorway Service Facilities (MSFs)	KM 16+000 (Type C) KM 45+500 (Type C) KM 83+700 (Type B)
Construction Camp Sites	Main Construction Camp Site (KM 60+000) Satellite Construction Camp Site (KM 16+000) Satellite Construction Camp Site (KM 84+000)
Lighting	To be provided at the interchanges, toll booths and MSFs.

Source: SPV, November 2025.

(*) These figures are based on Project's ESIA Report (March 2025).

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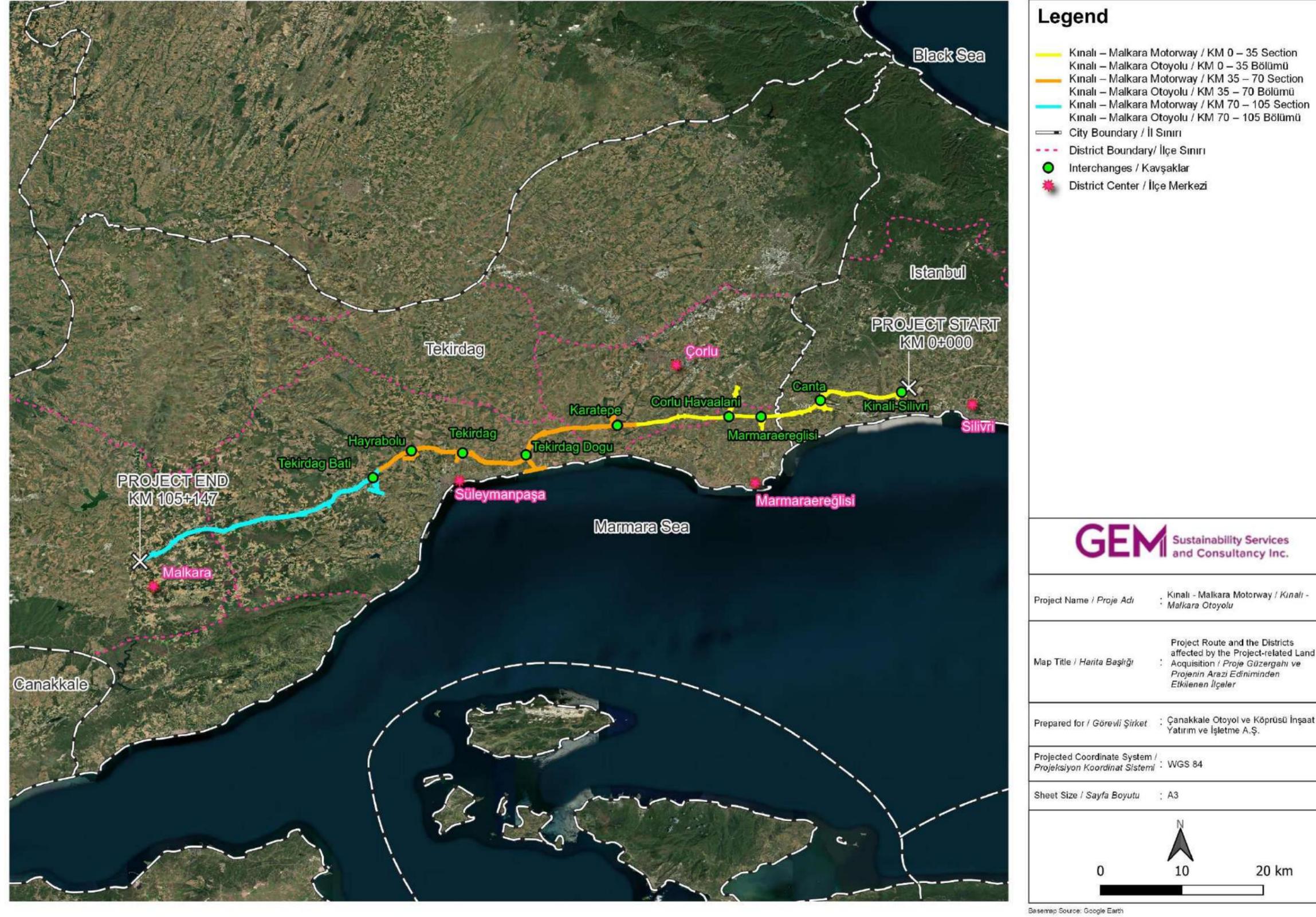


Figure 2-1. Kinalı - Malkara Motorway Route

2.1. Project Location and Route

The Project is located in **İstanbul and Tekirdağ** provinces and traverses the boundaries of **5 districts** (Silivri in İstanbul and Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara in Tekirdağ) and **39¹⁰ neighbourhoods**.

The neighbourhoods along the Project route are shown in Figure 2-2 (districts in İstanbul province), Figure 2-3 (districts in Tekirdağ province, Silivri and Çorlu districts) and Figure 2-4 (districts in Tekirdağ province, Süleymanpaşa and Malkara districts). The lengths of the main road sections and connection roads are provided in Table 2-2 and Table 2-3.

The settlements affected by Project-related land acquisition (hereinafter referred to as “**affected settlements**”) along the Motorway route are listed in Table 2-4.

Table 2-2. Main Road per District

District	Start KM	End KM	Approximate Length
Silivri	0+000	17+600	17.6 km
Marmaraereğlisi	17+600	25+550	8.0 km
Çorlu	25+550	43+600	18.0 km
Süleymanpaşa	43+600	95+450	51.9 km
Malkara	95+450	105+000	9.5 km
Total			105.0 km

Table 2-3. Connection Roads

District	Connection Road	Start KM
Silivri	Kınalı-Silivri	1+000
	Çanta	12+000
Marmaraereğlisi	Marmaraereğlisi	21+000
	Çorlu Airport	24+000
Çorlu	Karatepe	38+000
Süleymanpaşa	Tekirdağ East	51+000
	Tekirdağ	60+000
	Hayrabolu	68+000
	Tekirdağ Batı	73+000
Total		

¹⁰ The accelerated expropriation decision for the Project initially covered 38 neighbourhoods; however, Mahramlı Neighbourhood of Tekirdağ, Malkara indicated in the decision is not affected by the Project's land acquisition according to the current expropriation plans. According to the current expropriation lists, two additional neighbourhoods from Marmaraereğlisi – Sultanköy and Cedit Ali Paşa – have been added, bringing the total number of affected neighbourhoods to 39.

Table 2-4. List of Settlements Affected by Land Acquisition (within Expropriation Corridor)

District/Neighbourhood	KM 0-35	KM 35-70	KM 70-105	Number of Settlements
Silivri district				
Alipaşa	X			8
Yolçatı	X			
Sekizkumlar	X			
Çeltik	X			
Sancaktepe	X			
Balaban	X			
Değirmenköy	X			
Gümüşyaka	X			
Marmaraeğlisi district				
Sultanköy	X			5
Cedit Ali Paşa	X			
Yakuplu	X			
Türkmenli	X			
Çeşmeli	X	X		
Çorlu district				
Seymen	X			5
Şahpaz	X			
Türkgücü	X			
Yenice		X		
Maksutlu		X		
Süleymanpaşa district				
Karaevli		X		18
Husunlu		X		
Gazioğlu		X		
Köseilyas		X		
Kayı		X		
Eskicami		X		
Gündoğdu		X		
Aydoğdu		X		
Zafer		X		
Nusratlı			X	
Yağcı		X		
Karahisarlı			X	
Seymenli			X	
Güveçli			X	
Nusratfakı			X	
İnecik			X	
Akçahalil			X	
Kınıklar			X	
Malkara district				
Yenice			X	3
Hereke			X	
Ahievran			X	
Total				39

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Legend

- Kınalı – Malkara Motorway Expropriation Corridor/
Istanbul City / Kınalı – Malkara Otoyolu
Kamulaştırma Koridoru / İstanbul İli
- ★ Neighbourhood Centers / Mahalle Merkezleri
- ★ District Center / İlçe Merkezi

GEM Sustainability Services
and Consultancy Inc.

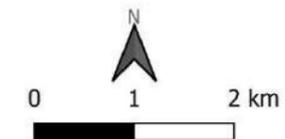
Project Name / Proje Adı : Kınalı - Malkara Motorway / Kınalı -
Malkara Otoyolu

Map Title / Harita Başlığı : Settlement along the Kınalı-Malkara
Motorway Route - İstanbul City /
Kınalı-Malkara Otoyol Geçerdiği
Üzerindeki Yerleşimler - İstanbul İli

Prepared for / Görevli Şirket : Çanakkale Otoyol ve Köprüsü İnşaat
Yatırım ve İşletme A.Ş.

Projected Coordinate System /
Projeksiyon Koordinat Sistemi : WGS 84

Sheet Size / Sayfa Boyutu : A3



Base map Source: Google Earth

Figure 2-2. Settlements along the Kınalı – Malkara Motorway Route – İstanbul Province

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Legend

- Kınalı – Malkara Motorway Expropriation Corridor/
Tekirdağ City / Kınalı – Malkara Otoyolu
Kamulaştırma Koridoru / Tekirdağ İli
- District Boundaries / İlçe Merkezleri
- Neighbourhood Centers / Mahalle Merkezleri
- District Center / İlçe Merkezi

GEM Sustainability Services
and Consultancy Inc.

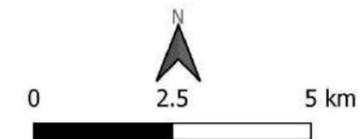
Project Name / Proje Adı : Kınalı - Malkara Motorway / Kınalı -
Malkara Otoyolu

Map Title / Harita Başlığı : Settlement along the Kınalı-Malkara
Motorway Route - Tekirdağ City /
Kınalı-Malkara Otoyol Güzergahı
Üzerindeki Yerleşimler - Tekirdağ İli

Prepared for / Görevli Şirket : Çanakkale Otoyol ve Köprüsü İnşaat
Yatırım ve İşletme A.Ş.

Projected Coordinate System /
Projeksiyon Koordinat Sistemi : WGS 84

Sheet Size / Sayfa Boyutu : A3



Base map Source: Google Earth

Figure 2-3. Settlements along the Kınalı – Malkara Motorway Route – Tekirdağ Province, Marmaraereğlisi and Çorlu districts

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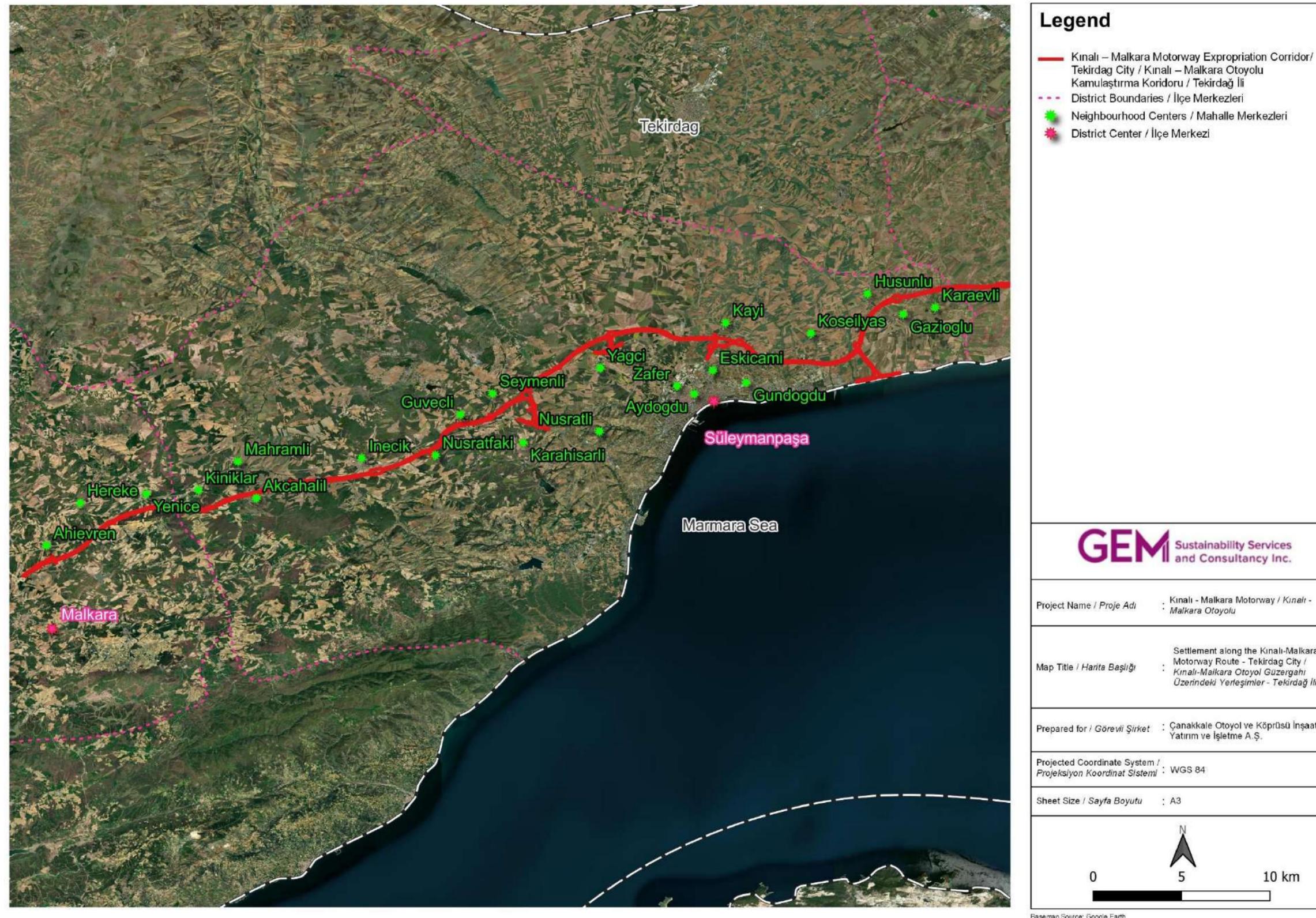


Figure 2-4. Settlements along the Kınalı - Malkara Motorway Route - Tekirdağ Province, Süleymanpaşa and Malkara districts

2.2. Expropriation Corridor

The **expropriation corridor** defines the boundaries within which land acquisition and expropriation activities are carried out by KGM for the Motorway and associated connection roads. All construction activities related to the main Motorway, such as excavation, embankment works, and the installation of permanent infrastructure, are executed within this designated corridor. Permanent components including **engineering structures, interchanges, and toll booths** are also located entirely within the corridor.

The **width of the expropriation corridor** varies along the route and is influenced by several factors:

- Topographical conditions requiring specific excavation or embankment profiles,
- The size and layout of engineering structures,
- Design specifications and dimensions of interchanges and service areas, which generally necessitate broader acquisition areas compared to standard Motorway sections,
- Presence of sensitive receptors and structures, which may prompt efforts to avoid or minimize impacts – such as narrowing the corridor to prevent the expropriation of existing residential buildings or commercial facilities, where feasible.

A summary of the **minimum and maximum** of the expropriation corridor along the full alignment of the Motorway is presented below.

- Minimum width: ~ 75 m
- Maximum width: ~ 680 m (at the location of the main construction camp site)



Figure 2-5. Examples for Variation of Expropriation Corridor Width Along the Project Route

Following the completion of construction works, the **entire expropriation corridor** along the Motorway alignment **will be fenced** in accordance with KGM Technical Specifications.

During the operational phase of the Project, access to and use of this fenced corridor by local communities and unauthorised individuals will be strictly prohibited, both for operational integrity and to ensure health and safety.

2.3. Project Components

The ESIA Report disclosed by the Project (March 2025) includes a detailed description of the Project and its components, as well as the Motorway design criteria.

In summary, the main Project components include the following (no tunnels or viaduct according to current Project design):

- Interchanges
- Bridges, Overpasses, Underpasses and Culverts
- Operation and Maintenance (O&M) Centre
- Motorway Service Facilities (MSFs)
- Salt Depots

In addition to these main components, there will be:

- Excavated materials storage sites (may be permanent or temporary facilities)
- Temporary construction facilities (including construction camp sites, concrete plants, asphalt plants, beam production plants, material borrow sites and quarries)

Information on the interchanges, O&M Centre, MSFs and Construction Camp Sites (as the key temporary construction facilities) is provided below. **These facilities have been located within the Motorway's expropriation corridor to avoid any additional land acquisition outside the corridor.**

Further information on the full range of engineering structures (bridges, overpasses, underpasses and culverts), including location (kilometre chainage) information as well as the status of land acquisition and permitting, **will be provided in the RAP.**

2.3.1. Interchanges

The list of planned interchanges is provided in Table 2-5. Interchange carriageways will consist of 2 lanes.

Table 2-5. List of Planned Interchanges

No.	Interchange Name	Motorway KM
1	Kınalı – Silivri	1+440
2	Çanta	12+240
3	Marmara Ereğlisi	20+770
4	Çorlu Airport	24+020
5	Karatepe	38+000
6	Tekirdağ East	51+360
7	Tekirdağ	59+800
8	Hayrabolu	67+700
9	Tekirdağ West	73+200

2.3.2. Overpasses, Underpasses and Culverts

To facilitate uninterrupted passage of agricultural roads, wildlife, and various watercourses beneath the Motorway, a range of underpasses, overpasses, and culverts with different diameters and structural specifications are planned. The spacing of these structures has been determined based on existing resources, infrastructure, local land use patterns and specific access requirements.

During Project implementation, the SPV, subject to KGM's approval, may provide additional structures within the expropriation corridor, if needed – particularly in response to requests from local communities, public authorities, or other stakeholders – to ensure no land severance or restricted access results from the Project.

A detailed list of all planned overpasses, underpasses, and culverts, including their locations and dimensions, will be provided in the RAP.

2.3.3. Operation and Maintenance Centre

There will be **one** operation and maintenance (O&M) centre on the Motorway as given in Table 2-6. The O&M centre will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

Table 2-6. O&M Centre

Road Part	KM	District	Settlement	Location
Main Road	60+000	Süleymanpaşa	Kayı	Within the Motorway's expropriation corridor

2.3.4. Salt Depots

The list of salt depots planned under the Project as part of the winter road maintenance system to be used during operations is provided in Table 2-7. The salt depots that will be used to store road salt and other de-icing/anti-icing materials will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

Table 2-7. List of Planned Salt Depots

No	KM	District	Settlement	Location
1	16+000	Silivri	Değirmenköy	Within the Motorway's expropriation corridor
2	83+000	Süleymanpaşa	İncecik	Within the Motorway's expropriation corridor

2.3.5. Motorway Service Facilities (MSFs)

The list of MSFs planned under the Project is provided in Table 2-8. The MSFs will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

At each MSF location, service areas will be situated on opposite sides of the Motorway's carriageways.

Table 2-8. List of Planned MSFs

No	MSF Type	KM	District	Settlement
1	Type C	16+000	Silivri	Değirmenköy
2	Type C	45+000	Süleymanpaşa	Husunlu
3	Type B	84+700	Süleymanpaşa	İncecik

2.3.6. Excavated Materials Storage Sites

In addition to the Motorway components, the Project will include excavated material storage sites designated for the placement and storage of surplus materials from excavation works that are unsuitable for reuse.

The list of planned storage areas is provided in ESIA – Section 3.3.5.2. Accordingly, a total of **15** storage areas have been assessed under the ESIA.

The list of planned excavated material storage sites under the Project is provided in Table 2-9. Information on the land acquisition and permitting status of these sites will be provided in the RAP.

Table 2-9. List of Planned Storage Areas

No	Facility Name	Province	District	Neighbourhood	Motorway KM	Distance from the Route (km)	App. Area (m ²)	Status (Existing/New)	Operated by SPV
1	Storage Area-1	İstanbul	Silivri	Çeltik	2+500	2.75	30.0	New	Yes
2	Storage Area-2	İstanbul	Silivri	Çanta	5+250	9.50	39.2	Existing quarry operated by KGM	Yes
3	Storage Area-3	İstanbul	Silivri	Gümüşyaka	17+540	3.10	33.4	New	Yes
4	Storage Area-4	Tekirdağ	Çorlu	Seymen	20+170	4.62	31.5	New	Yes
5	Storage Area-5	Tekirdağ	Marmaraereğlisi	Türkmenli	26+900	2.86	48.5	New	Yes
6	Storage Area-6	Tekirdağ	Çorlu	Türkgücü	30+320	1.85	28.0	To be used as borrow pit after completion of quarry usage	Yes
7	Storage Area-7	Tekirdağ	Süleymanpaşa	Husunlu	47+510	3.00	35.0	New	Yes
8	Storage Area-8	Tekirdağ	Süleymanpaşa	Köseilyas	53+400	1.95	40.0	New	Yes
9	Storage Area-9	Tekirdağ	Süleymanpaşa	Kayı	60+470	2.65	29.9	New	Yes
10	Storage Area-10	Tekirdağ	Süleymanpaşa	Yağcı	68+390	2.15	40.0	New	Yes
11	Storage Area-11	Tekirdağ	Süleymanpaşa	Seymenli	73+000	0.00	40.0	New	Yes
12	Storage Area-12	Tekirdağ	Süleymanpaşa	Seymenli	75+830	2.00	13.5	New	Yes
13	Storage Area-13	Tekirdağ	Süleymanpaşa	Nusratfakı	80+500	1.85	30.0	New	Yes
14	Storage Area-14	Tekirdağ	Süleymanpaşa	İncik	85+100	0.64	17.5	New	Yes
15	Storage Area-15	Tekirdağ	Süleymanpaşa	Kınıklar	93+820	0.70	40.0	New	Yes

Source: ESIA (March 2025)

2.3.7. Temporary Construction Facilities

The temporary construction facilities planned for use under the Project include the following:

- **Construction camp sites (main and satellite)** of the SPV and EPC Contractor (including subcontractors), including associated camp facilities such as dormitories, administrative offices, social facilities, and other supporting infrastructure;
- **Material borrow sites and quarries**, designated for the extraction of raw materials required for construction activities (including pre-screened fill material) – these may include licensed operational sites or new sites to be established specifically for the Project;
- **Mechanical, Asphalt, and Concrete Plants**, for on-site production of construction materials; and
- **Beam Production Plants**, established to support the fabrication of structural components for bridges and viaducts.

The number of temporary construction facilities planned under the Project is provided in Table 2-1. Information on their location along with their land acquisition and permitting status, **will be provided in the RAP**.

The locations of the main and satellite construction camp sites have been selected at the MSF locations, which lie within the Motorway's expropriation corridor to avoid additional land acquisition for these temporary facilities.

In addition to the construction camp and facility sites planned by the SPV and EPC Contractor, there may be additional camp and facility sites proposed by **subcontractors** engaged in the Project. These potential sites will be identified and confirmed by the SPV and EPC Contractor in due course. Should such sites be required, the SPV will monitor and ensure that the EPC Contractor secures all necessary permits and licenses, and that the sites are operated in full compliance with national environmental legislation, requirements of this RPF and the subsequent RAP and other applicable Lender standards, prior to the commencement of operations.

The list of planned temporary construction facilities are provided in Table 2-10 to Table 2-12.

The final list of temporary facilities (quarries, plants, etc.) to be used under the scope of the Project will be confirmed by the SPV and EPC upon completion of the permitting processes. As of November 2025, there is no Project-related activity at none of the temporary facility sites.

Land Acquisition for Temporary Facilities that are outside the Motorway's Expropriation Corridor

Temporary facilities, such as construction camps, plants, and storage areas, **may or may not be located within the expropriation corridor**, depending on land availability and operational considerations.

When located outside the expropriation corridor, the land acquisition processes for temporary facilities are carried out as follows:

- **Privately-owned parcels:** The SPV or EPC Contractor acquires the necessary land through rental agreements, mutual protocols, or similar arrangements with landowners or shareholders. Upon completion of the temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed conditions.
- **State-owned parcels:** Lands owned by the Treasury or non-registered lands are allocated to the Project upon application by KGM, without requiring payment. These lands are similarly rehabilitated and handed back to the State at the end of the temporary use period, in line with agreed terms.
- **Parcels owned by legal entities:** Such parcels may be temporarily allocated to the Project upon KGM's application, with or without payment, depending on the specific agreement between KGM and the legal entity. As with other cases, the land is rehabilitated and returned to the legal entity after use.

Table 2-10. List of Planned Camp Sites

No	Facility Name	Province	District	Neighbourhood	Motorway KM	Distance from the Route (km)	App. Area (m ²)	Status (Existing/New)	Operated by SPV
Camp Site									
1	Camp Site-1	Tekirdağ	Süleymanpaşa	Gazioğlu	60+000	1.80	30.7	New	Yes
Subcontractor Site									
2	Sub-construction Site-1	İstanbul	Silivri	Fevzipaşa	16+000	2.30	13.3	New	Yes
3	Sub-construction Site-2	Tekirdağ	Süleymanpaşa	İncik	83+500	0.00	12.5	New	Yes

Source: ESIA (March 2025)

Table 2-11. List of Planned Quarries and Borrow Pits

No	Facility Name	Province	District	Neighbourhood	Motorway KM	Distance from the Route (km)	App. Area (m ²)	Capacity (ton)	Status (Existing/New)	Operated by SPV
Borrow Pits										
1	Borrow Pit-1 (Çanta)	İstanbul	Silivri	Çanta	5+250	9.50	19.88	6,000,000	New	Yes
2	Borrow Pit-2 (Türkgücü)	Tekirdağ	Çorlu	Türkgücü	30+320	1.85	29.88	7,500,000	New	Yes
3	Borrow Pit-3 (İncik Kuzey)	Tekirdağ	Süleymanpaşa	İncik	85+100	4.30	19.98	6,000,000	New	Yes
4	Borrow Pit-4 (İncik Güney)	Tekirdağ	Süleymanpaşa	İncik	85+100	1.80	19.87	6,000,000	New	Yes
5	Borrow Pit-5 (Mahramlar)	Tekirdağ	Süleymanpaşa	Mahramlı	91+390	1.00	29.72	7,500,000	New	Yes
Quarries										
6	Danamandıra Limestone Quarry	İstanbul	Silivri	Danamandıra	5+250	36.00	62.05	9,000,000	Existing	Yes
7	Muratlı Basalt Quarry	Tekirdağ	Muratlı	Muradiye	60+500	16.50	7.00	1,500,000	Existing	Yes
8	68+000 Basalt Quarry*	Tekirdağ	Süleymanpaşa	Yağcı	68+000	1.10	TBD	TBD	-	-
9	Osmanlı Basalt Quarry	Tekirdağ	Süleymanpaşa	Osmanlı	68+000	4.40	14.51	4,000,000	Existing	Yes
10	Tepeköy Limestone Quarry	Tekirdağ	Malkara	Tepeköy	83+500	61.30	24.86	4,000,000	Existing - capacity increase	No
11	Dereköy Basalt / Limestone Quarry	Tekirdağ	Malkara	Dereköy	96+740	1.00	20.30	TBD	Existing – capacity increase	No

Source: ESIA (March 2025)

*TBD based on capacity assessment.

Table 2-12. List of Planned Facilities

No	Facility Name	Province	District	Neighbourhood	Motorway KM	App. Area (m ²)	Capacity (ton)	Status (Existing/New)	Operated by SPV
Concrete Batching Plant									
1	Concrete Batching Plant-1	İstanbul	Silivri	Fevzipaşa	16+000	To be located within campsite	90 m ³ /h	New	Yes
2	Concrete Batching Plant-2	Tekirdağ	Süleymanpaşa	Gazioğlu	60+000	To be located within campsite	110 m ³ /h	New	Yes
3	Concrete Batching Plant-3	Tekirdağ	Süleymanpaşa	İncelik	83+500	To be located within campsite	100 m ³ /h	New	Yes
Asphalt Plant									
1	Asphalt Plant-1	İstanbul	Silivri	Fevzipaşa	16+000	To be located within campsite	340 ton/h hot mix 450 ton/h cold mix	New	Yes
2	Asphalt Plant-2	Tekirdağ	Süleymanpaşa	İncelik	83+500	To be located within campsite	340 ton/h hot mix 450 ton/h cold mix	New	Yes
Mechanical Plant									
1	Mechanical Plant-1	İstanbul	Silivri	Fevzipaşa	16+000	To be located within campsite	TBD	New	Yes
2	Mechanical Plant-2	Tekirdağ	Süleymanpaşa	İncelik	83+500	To be located within campsite	TBD	New	Yes
Precast Plant									
1	Precast Plant-1	İstanbul	Silivri	Fevzipaşa	16+000	To be located within campsite	4 girders/day	New	Yes
2	Precast Plant-2	Tekirdağ	Süleymanpaşa	İncelik	83+500	To be located within campsite	4 girders/day	New	Yes

Source: ESIA (March 2025)

2.3.8. Associated Facilities

The IFC PS1 (2012) defines “**associated facilities**” as follows:

“...facilities that are **not** funded as part of the project and that would **not** have been constructed **or** expanded if the project did not exist and without which the project would not be viable.

Footnote: Associated facilities may include railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, and logistics terminals.”

The ESIA Report disclosed by the Project (March 2025) indicates that “Among others, the main Project facilities to be considered in the ESIA are the following: temporary associated facilities (which will be used only during construction of the Project):

- Quarries and borrow pits;
- Camp sites and storage areas;
- Crushers, concrete batching plants and asphalt plants; and
- Access roads.

In the event that associated facilities are identified during or following the completion of the final design, the SPV will ensure that any displacement risks or impacts resulting from such facilities are managed and mitigated in accordance with Turkish legislation, the objectives of IFC Performance Standard 5 (PS5), and the principles outlined in this RPF.

Please refer to Section 3.6.5 for the procedure to be followed in case of potential additional expropriation works.

2.5. Project Schedule

For the 1915 Çanakkale Motorway and Connection Roads section of the Project, **ÇOK A.Ş.**, as the SPV, was awarded the BOT tender launched in January 2017 by the Directorate General of Highways (KGM), under the Ministry of Transportation and Infrastructure¹¹. In March 2017, the **Implementation Contract (BOT Contract)** for the Project was signed between the **KGM** and **ÇOK A.Ş.**, as the **Appointed Company**, and the Project was officially inaugurated on March 18, 2022.

The KM Section is intended to be included within scope of the Project Company’s appointment under the Implementation Contract as an additional work to the MC Section. The Project Company and the KGM signed a **MoU** in September 2022,

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as 36 months following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway’s operation period, ending at the same date. The SPV targets to finalise and execute the financing documents by the end of 2025. Consequently, construction works are planned to commence in **January 2026** and progress lot by lot, on parcels where the land acquisition process has been completed and land becomes available for the corresponding construction section. The expropriation and construction schedules are agreed between KGM and the SPV, ensuring alignment of timelines and Project implementation. **The expropriation process for the Project was initiated by KGM in 2024 for Section 3 (KM 70 – 105) and as of November 2025, expropriation procedures – including court proceedings and the transfer of title deeds to KGM – have been completed for Lot KM 81+360 – 88+300 and in progress for other lots in Section 3.** Therefore, the SPV plans to commence construction works in Section 3 (in January 2026), in the lots where expropriation has already been completed as of the construction start date.

¹¹ <https://www.1915canakkale.com/hakkinda/projenin-kunyesi>

Table 2-13 below provides a summary of **key milestones** for expropriation, construction, E&S studies and Project finance according to current KGM approved schedule. The dates given for the expropriation in this table represent the estimated completion dates for the expropriation of the related sections, and it is assumed that the expropriation process will start at least 6 months before the planned construction activities in the respective areas. Each section is also divided into several lots, defined based on the priorities of specific locations (such as camp site locations) in accordance with the construction sequence, and these are being communicated to KGM to enable them to plan their expropriation studies in parallel with the requirements of the construction schedule. On the other hand, the work program is arranged in a manner that allows it to be reorganised in terms of resequencing the works depending on the progress of the expropriation.

In case there is a need for the expropriation of land before the completion of RAP studies, necessary measures will be taken by the SPV using the RPF as a reference, and site deliveries will be achieved by obtaining the consent of landowners for private parcels. Land entry will be permitted only after the entitled Project affected persons (PAPs) have been compensated in accordance with the commitments outlined in the RPF. Respective RAPs will be prepared, and all activities will be carried out in line with the RPF commitments until the RAPs are finalised.

Table 2-13. Key Project Schedule Milestones

No	Key Milestones / Tasks	Date
0	BOT Contract and Design	
0.1	Execution of the Implementation Contract for 1915 Çanakkale Motorway and Connection Roads (Malkara – Çanakkale Section)	Mar 2017
0.2	MoU signed for KM Section	Sep 2022
0.3	Groundbreaking Ceremony for KM Section	Mar 2025
1	Expropriation	
1.1	Start of inventory of assets and valuation study commenced by appointed Valuation Contractor	Apr 2024
1.2	Start of expropriation procedures by KGM (through Article 8 notifications and negotiation meetings)	2024
1.3	Completion of expropriation by KGM:	
1.3.1	Section 1: KM 0 – 35	Feb – Aug 2026
1.3.2	Section 2: KM 35 – 70	Mar – Sep 2026
1.3.3	Section 3: KM 70 – 105	Started – Jan 2026
2	E&S Studies and Finance Agreement	
2.1	Start of ESIA Package studies	Apr 2022
2.2	Start of RPF/RAP studies	Oct 2025
2.3	RPF Finalisation and Start of Implementation	Dec 2025
2.4	Finance Agreement Signing	Dec 2025
2.5	Financial Close	Jan 2026
2.6	RAP Preparation ¹²	Q1 2026
2.7	RAP Finalisation (incorporating feedback from Lenders and LESA) and Start of Implementation (Note: The timeframes for the finalisation and commencement of the Final RAP implementation are dependent on the review and approval process of the Lenders and the LESA)	Q1 – Q2 2026
3	Construction Works	
3.1	Site Mobilisation and Preparation of Construction Camp Site	Jan 2026
3.2	Signing Infrastructure (Existing) Displacement Protocols with the Relevant Authorities	Dec 2024 – Dec 2025
3.3	Start of Infrastructure (Existing) Displacement Works	Jan 2026
3.4	Start of Construction	Jan 2026
3.4.1	Start of Construction for Section 1: KM 0 – 35	Apr 2026
3.4.2	Start of Construction for Section 2: KM 35 – 70	Jun 2026

¹² If needed – depending on the availability of structure valuation forms, valuation reports, and overall Project planning and progress – the RAP may be prepared separately for the three sections of the Motorway, prioritising the sections where construction works will begin first. Accordingly, the RAP for Section 3 and Section 1 would be prepared initially, followed by Section 2. However, if the data for Section 2 becomes fully available in due course, a single RAP covering the full alignment would be prepared instead. This will be decided in consultation with the Lenders and LESA during RAP preparation.

No	Key Milestones / Tasks	Date
3.4.3	Start of Construction for Section 3: KM 70 – 105	Jan 2026
3.5	Earthworks	May 2026 – Aug 2028
3.6	Large and Small Engineering Structures (including drilling)	Jan 2026 – Aug 2028
3.7	Superstructure Works	Dec 2026 – Mar 2028
3.8	Completion of Secondary Works (Landscaping, Lighting, Tunnel Electromechanics, Signage, Barriers, Fencing), Intelligent Transportation Systems	Jan 2026 – Dec 2028
4.	Motorway Commissioning	September 2028 – January 2029 (target)
5.	RAP Implementation and Monitoring	Until the RAP Completion Audit ¹³

The SPV, in collaboration with KGM, will continue **RAP implementation for a duration of 36 months**, following the approval of the RAP by the Lenders and the LESA. This period will encompass the entire construction phase and may extend into the initial months of the commissioning and operational phase, if needed.

Throughout the implementation period, internal monitoring by the SPV will be conducted on an ongoing basis to ensure regulatory compliance and the timely delivery of entitlements and support measures to affected individuals and communities in line with the RAP. Approximately two years after the completion of all RAP measures, including post-implementation monitoring, **a RAP Completion Audit will be carried out**. This audit will be undertaken by independent resettlement consultant(s), who will be approved by the Lenders and commissioned by the SPV. The audit will verify the successful fulfilment of all RAP commitments, with particular emphasis on the restoration of livelihoods for affected persons and households.

2.6. Current Construction Status

On **18 March 2025**, a **groundbreaking ceremony**¹⁴ was held for the Kınalı – Malkara Motorway Project on parcels that were expropriated for the 1915 Çanakkale Motorway and Connection Roads Project.

Apart from the site preparations made for the ceremony and design-related activities – including mapping and drilling operations that were initiated, site mobilisation and construction works for the Project have **not** yet started.

2.7. Current Land Acquisition Status

Land acquisition activities for the Project – including expropriation of privately-owned parcels – began in **2024**.

The decisions and decrees issued by the relevant national authorities regarding the expropriation works to be carried out within the scope of the Project are as follows:

- The **Public Benefit Decision** (No:2022/138) for the Project was declared by the **MoTI** on **6 July 2022**.
- A **Presidential Decree** (Decision Date: 12 April 2023, No. 7060) concerning the **Accelerated Expropriation** of certain immovable properties under the scope of the Project (located within the settlements covered by the Decree) by the KGM in line with Article 27 of the Expropriation Law of Türkiye (Law No. 2942, 1983) was published¹⁵ in the Official Gazette (No. 32162) on **13 April 2023** (referred to as **Accelerated Expropriation Decision**).
- The **Expropriation Decisions** were taken for the Project by **KGM for the lots where expropriation has been carried out to date**.

The inventory of assets and valuation studies for parcels affected by the Project's current alignment have been conducted in accordance with the technical specifications of the KGM. These activities have been carried out since

¹³ The RAP Completion Audit will be conducted following the completion of the agreed post-implementation RAP monitoring period to confirm that the livelihoods of affected people have been restored, relevant livelihood restoration and monitoring activities have been implemented as per the RAP commitments.

¹⁴ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/OtoyolProjeleri/KinaliMalkara.aspx>

¹⁵ <https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf>

April 2024 by a certified national engineering firm (“**valuation contractor**”), appointed by the SPV and approved by KGM.

As part of this process, field identification works are undertaken to prepare detailed inventory of assets for each affected parcel as part of the expropriation plans. Subsequently, structure valuation forms and valuation reports are prepared in a progressive manner along the route, based on the identified assets.

Status of the expropriation plans, structure valuation forms and valuation reports prepared by the valuation contractor for the full alignment is summarized in Table 2-14. Official expropriation procedures, including the Article 8 invitations sent to affected owners by KGM, begin **after the completion and approval of the valuation reports by KGM for the relevant parcels**. Accordingly, expropriation works in this Project proceed lot by lot, depending on the completion of the valuation reports for respective parcels and subject to the availability of KGM’s expropriation budget.

Table 2-14. Status of Expropriation Plans and Valuation Documentation

Expropriation and Valuation Documentation	KM 0 – 35	KM 35 – 70 ¹⁶	KM 70 – 105
Expropriation Plans and Lists approved by relevant Cadastral Office	Completed	In progress ¹⁷	Completed
Structure Valuation Forms	In progress	To be prepared	Completed
Valuation Reports	In progress	To be prepared	Completed

Source: KÖSOB, November 2025

Expropriation works for the Project were initiated by KGM in 2024. For Lot **KM 81+360 – 88+300**, expropriation procedures – including court proceedings and the transfer of title deeds to KGM – **have been completed**. Considering the construction schedule of the Project, Article 27 **was not applied by KGM to date**. Instead, Article 10 was implemented in cases where Article 8 agreement protocols could not be signed with the right holders.

Data on the expropriation works for KM 70 – 105 (as of November 2025) was obtained from KGM’s KÖSOB as part of the RPF studies and is summarised in Table 2-15.

Table 2-15. Expropriation Status of Private and Legal Entity Parcels mainly for KM 70 – 105 (as of November 2025)

Ref	Indicator	Number
A	Number of parcels for which expropriation has started	453¹⁸
B	Number of parcels invited for Article 8 negotiations (C + E)	447
C	Number of parcels with purchase agreements signed for full shares	36
D	Number of parcels with purchase agreements signed for partial shares	29
E	Number of parcels for which a lawsuit has been filed (Article 10) (G + H)	411
F	Number of parcels paid through court decision	215
G	Number of parcels with annulment (<i>terkin</i>) decisions	179
H	Number of parcels with ongoing court procedures (Article 10)	232
I	Number of parcels for which title deeds have been obtained	39
	Total number of private parcels in the Project (full alignment)	2,257

Source: KÖSOB, November 2025.

¹⁶ The SPV anticipates that the approved expropriation plans, structure valuation forms, and valuation reports for this section will be completed around the end of 2025. This will be followed by Article 8 notifications by KGM, marking the start of the expropriation process for this section. The process will proceed entirely within the budget framework of the KGM Directorate General and KÖSOB.

¹⁷ Submitted to the relevant Cadastral Office for approval in November 2025.

¹⁸ In Section 3, there are 439 private parcels and 9 legal entity parcels, totaling 448 parcels. As indicated under Item (B), KGM invited the owners of 447 parcels to Article 8 negotiations, omitting 1 parcel (originally included among 4 because it may be excluded from expropriation through avoidance measures. In addition to these 447 parcels, KGM has initiated expropriation procedures for 5 additional parcels corresponding to electricity transmission line displacement areas. Information on the electricity transmission line displacement works and the associated expropriation requirements is currently being collated by the SPV and will be presented and assessed in the RAP once the relevant data become available.

2.8. Avoidance and Minimisation

The design, engineering, and route optimisation processes undertaken for the Project to date have been guided by the principle of **avoiding and minimising E&S risks and impacts**, as stipulated by, and in consultation with, the relevant national authorities. This approach has informed key decisions related to route selection, land use planning, and the siting of critical infrastructure components, with the aim of reducing potential adverse effects on local communities and the natural environment.

As is well established, BOT motorway projects implemented by the KGM are planned and designed in accordance with KGM's design criteria and technical specifications. In line with these institutional standards, the **minimisation of land use and expropriation** is considered as a fundamental criterion during the planning and preliminary design phases. The objective is to **reduce expropriation costs** and **mitigate the social and economic impacts** associated with land acquisition processes.

In addition to this, other important criteria considered by KGM include the following:

- Soil conditions and geohazards,
- Biodiversity and cultural heritage elements,
- Regional and local zoning and development status,
- Construction and O&M costs,
- Potential for future expansion, and
- Transportation safety and user comfort.

The MoU signed for the KM Section included the **1/5,000**-scale preliminary project design and route as an attachment. Following the signing of the MoU, the SPV has initiated **1/1,000**-scale project design and engineering works for the optimisation of the route addressing technical, economic, E&S aspects and constraints.

The changes made in the design and their reasons were documented by the SPV and the details **will be presented in the RAP**.

Avoidance and Minimisation during Project Implementation

During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the following mechanisms:

- Based on the geological investigations (e.g. boreholes, trial pits, laboratory testing, etc.) and design works carried out, **1/1,000**-scale implementation projects are prepared by the SPV – covering aspects such as alignment revisions (e.g. slope angles, elevations) and engineering structures (e.g. bridges, overpasses, underpasses, culverts) – before construction begins, subject to approval by KGM. During this process, multiple revisions are likely to occur on the **1/5,000**-scale preliminary route. This **dynamic process** will allow revisions on the route and incorporation of measures to further avoid impacts on lands and structures (for example, avoiding a house through constructing a pile or a retaining wall, where technically feasible).
- In accordance with Project's avoidance strategy, the expropriation boundary for the Project has been established with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel. To this end, a parcel-based review and assessment covering the full alignment was carried out by KGM and the valuation contractor. Where avoidance of orphan lands has not been feasible, affected people will have the right to submit requests to KGM seeking acquisition of orphan lands, as outlined in Section 3.1. These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.
- The technical teams of the SPV and EPC Contractor will maintain engagement with affected people and, subject to KGM's approval, carry out further studies to explore and implement further opportunities for avoiding or minimising displacement impacts.

3. Project Impacts

The Project affects **privately-owned, state-owned (public parcels** including treasury including pasture, forestry, non-registered, etc.) and **legal entity parcels** (such as municipalities, public corporations, associations, foundations, etc.) within Motorway's **expropriation corridor**.

The Project impacts presented in this RPF have been identified based on the following documentation received from KGM and reviewed by the RAP Consultant:

- Expropriation Plans and Lists for KM 0 – 35 (approved by relevant Cadastral Office)
- Expropriation Plans and Lists for KM 70 – 105 (approved by relevant Cadastral Office)
- Expropriation Plans and Lists for KM 58 – 60 covering the location of the Main Construction Camp Site at KM 60+000
- Structure Valuation Forms for KM 70 – 105

Table 3-1 presents a summary of the affected area and number of parcels for the three sections. The cadastral approval process for the expropriation plans of **KM 35 – 70** is ongoing, and the indicative figures provided for this section will be confirmed during the RAP once the approved expropriation plans become available.

Table 3-1. Summary of Affected Area and Number of Parcels

Ownership	Total Expropriation Area (m ²)			Number of Parcels			
	Section 1 KM 0 – 35	Section 2 KM 35 – 70	Section 3 KM 70 – 105	Section 1 KM 0 – 35	Section 2 KM 35 – 70	Section 3 KM 70 – 105	Total
Private	5,821,604.81	6,119,678.00	3,097,791.79	1,069	749	439	2,257
State (Public)							
Treasury	28,820.15	65,364.00	17,666.10	27	8	21	56
Pasture	94,988.37	24,511.00	247,661.53	4	3	7	14
Forestry	0.00	0.00	923,514.14	0	0	27	27
Non-registered	74,666.23	261,455.00	43,027.41	16	32	17	65
Roads ¹⁹	117,985.24	547,421.00	83,116.90	86	67	41	194
Legal Entity	4,250.69	163,409.00	70,743.41	6	20	9	35
Total – Section-based	6,142,315.49	7,181,838.00	4,483,521.28	1,208	879	561	2,648
Grand Total	17,807,674.77 m²			2,648 parcels			

Note: These figures are based on current version of the expropriation plans and may change. Final confirmation is awaited from KGM and final figures will be presented in the RAP.

The number of parcels containing affected structures – including **buildings** and other **major²⁰ non-residential structures**, as well as the number of structures on these parcels based on the **expropriation plans**, is summarised in Table 3-2.

¹⁹ These are cadastral roads located along the route and fall within the expropriation corridor. They will be expropriated and will then be transferred to the KGM.

²⁰ **Major structures** include canopies, barns, sheds, depots, pools, and immovable components of the irrigation and drainage systems, as these structures typically support the livelihood activities of the affected people. Structures such as fences and walls are not considered under this categorisation.

Table 3-2. Number of Parcels Containing Major Structures

Section	Province	District	Neighbourhood	Number of Parcels Containing Major Structures	Number of Major Structures	
					Buildings	Other Structures (*)
KM 0-35	İstanbul	Silivri	Alipaşa	1		1
			Çeltik	8(**)	5	7
			Sancaktepe	8(**)	2	11
			Balaban	8(**)	7	17
			Değirmenköy	1(**)	1	
			Gümüştaka	4	4	10
	Tekirdağ	Marmaraereğlisi	Çeşmeli	1		1
			Çorlu	1	1	2
		Şahpaz	1	1	1	
Sub-total KM 0-35				9	21	50
KM 35-70 (***)	Tekirdağ	Süleymanpaşa	Kayı	5	4	8
			Zafer	1	3	1
			Sub-total KM 35-70			
KM 70-105	Tekirdağ	Süleymanpaşa	Seymenli	2		2
			Güveçli	2	1	3
			İnecik	4		14
			Akçahalil	2		2
	Malkara	Yenice	1		2	
Sub-total KM 70-105				5	11	23
Total				16	49	82

Note: These figures are based on current version of the expropriation plans and may change. Final confirmation is awaited from KGM and final figures will be presented in the RAP.

(*) Other structures include sheds, warehouses, barns, pools, wells, henhouses, toilets on affected parcels.

(**) These structures are not indicated on the expropriation plans reviewed and have been identified by the RAP Consultant through a GIS-based analysis of the route. According to Google Earth imagery, there appear to be structures on two parcels in Çeltik Neighbourhood and on one parcel each in Sancaktepe, Balaban, and Değirmenköy neighbourhoods. These structures have been shared with the Client and will be confirmed in due course based on the structure valuation forms, once they become available.

(***) For the KM 35 – 70, expropriation plans are available **only** for the **main construction camp site area (KM 58 – 60)**. In **these plans**, there are **four** structures indicated as “**commercial**” (“*ticarî*”) on **two** parcels in Kayı Neighbourhood, and **three** structures indicated as **residential** (“*mesken*”) on **one** parcel in Zafer Neighbourhood.

It is important to note that that the expropriation plans do not explicitly identify the type of buildings, such as residential, business or other; instead, they use the generic terminology “**building**”. Further identification of what each building represents – for example, a residential house, vineyard house or business structure – will be undertaken based on the review of structure valuation forms, which will be obtained by the SPV from the KGM and used by the RAP Consultant as part of the RAP preparation works. Owners and users (formal and informal) of each structure will be identified as part of the RAP field surveys through interviews to be conducted with settlement heads and/or affected people (see Chapter 5).

According to the desk-based review of the expropriation plans and a visual analysis of the route using GIS tools, no greenhouses have been identified. Business structures are currently observed only at the location of the main construction camp site. This initial analysis will be further verified once the structure valuation forms become available for the full route and based on the field surveys to be conducted by the SPV and RAP Consultant teams. If any greenhouses and/or business structures are identified, interviews will be carried out with their owners to further determine the type and scale of activities, as well as potential livelihood impacts.

There will be also other **temporary construction facilities**, such as construction camp sites, storage sites, plant sites (such as concrete plant, asphalt plant, mechanical plant, etc.) that will lead to impact on lands.

The method of land acquisition will involve permanent or temporary land take, as summarised below:

- **Permanent land take:** All land on which **Project components** within the designated expropriation corridor will be constructed – including the Motorway, interchanges, engineering structures, MSFs, and O&M centre – will be subject to **permanent** land take.

During the operation phase, access to lands within the expropriation corridor will be fully restricted for local communities and unauthorised third parties. Exceptions will apply to areas situated beneath bridges. In accordance with KGM Technical Specifications, the **entire Motorway alignment will be fenced** upon completion of construction to ensure the safety of vehicular traffic, pedestrians, and wildlife.

- **Temporary land take:** The SPV has located the construction camp sites and part of the facilities within the Motorway's expropriation corridor to avoid any additional land acquisition outside the corridor.

Should any **temporary facilities** be situated outside the Project's expropriation corridor, the respective lands will be subject to **temporary** land take, in accordance with the processes outlined below:

- **Privately-owned parcels:** The SPV or EPC Contractor acquires the necessary land through rental agreements, mutual protocols, or similar arrangements with landowners or shareholders based on fees negotiated and mutually agreed at market rates. Upon completion of the temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed conditions.
- **State-owned parcels:** Lands owned by the Treasury or non-registered lands are allocated to the Project upon application by KGM, without requiring payment. These lands are similarly rehabilitated and handed back to the State at the end of the temporary use period, in line with agreed terms.
- **Parcels owned by legal entities:** Such parcels may be temporarily allocated to the Project upon KGM's application, with or without payment, depending on the types of entities and specific agreement between KGM and the legal entity. As with other cases, the land is rehabilitated and returned to the legal entity after use.

The land-use types of the parcels to be temporarily used may vary, such as agricultural, pasture, forest, etc. The required land-use permits (such as permits for the non-agricultural use of agricultural land, change of allocation for pasture parcels, or forestry permits for forest parcels) will be obtained by KGM – where relevant by SPV or EPC Contractor – from the relevant authorities (for example, the Provincial Directorate of Agriculture and Forestry for agricultural and pasture parcels, or the relevant forestry directorate for forest parcels), depending on the applicable land-use type.

These sites will be rehabilitated upon completion of construction activities – unless the KGM decides to retain their use during the operation phase. Following rehabilitation, the sites will be returned to the respective landowners.

Permanent or temporary land acquisition may lead to physical or economic displacement for users of the affected lands and structures. Based on an analysis of the available expropriation plans prepared and issued by the valuation contractor, the land acquisition-related impacts are primarily classified under the following:

- Affected lands** (may include non-residential and non-commercial structures such as depots, barns, wells, etc.)
- Affected houses**
- Impacts on vulnerable people**
- Temporary losses/impacts during construction**²¹, and
- Impacts during operation**

The impact on each category further varies depending on whether the land or structures are subject to **full** or **partial** expropriation.

²¹ Construction activities result in temporary impacts on the owners and/or users of affected lands and assets. Health, safety and environmental risks and impacts of construction works (e.g. noise and air quality, health and safety risks on local people trespassing the construction corridor or due to Project traffic, impact on local roads, etc.) impacts are identified and assessed in Project's ESIA Report. During Project implementation, impacts will be monitored by the SPV and the EPC Contractor through site inspections, periodic E&S monitoring studies, and ongoing stakeholder engagement. Management of these impacts will be carried out via the Project-specific grievance mechanism. The EPC Contractor will implement E&S avoidance and mitigation measures during construction – such as dust suppression, minimisation of water use, and reduction of blasting impacts through optimised blasting design, among others – in accordance with the Project ESIA and the associated E&S management plans.

3.1. Affected Lands

The **impact categories** for affected lands include the following; therefore, **owners/shareholders²² and/or formal and informal users** of these lands may be subject to the Project's displacement impacts. The RAP will identify land-related impacts based on expropriation data combined with findings from the RAP field surveys.

- Permanent loss of private parcels (agricultural parcels and constructible plots)
- Permanent loss of state-owned parcels (e.g. treasury, non-registered parcels) which are used for economic purposes)
- Permanent loss of forest land used by local people for economic purposes
- Permanent loss of registered pasture lands
- Restriction of access to lands used for grazing – located out of Project expropriation corridor (public or private) due to land fragmentation or other Project-related factors
- Orphan lands
- Fragmented lands
- Loss of crops on private or public parcels
- Loss of trees (fruit or non-fruit trees) on private or public parcels
- Loss of non-residential structures on affected private or public parcels (non-residential/secondary structures, depots, barns, sheds, etc.)
- Litigious properties ("*ihtilafli bulunan mülkiyet*")
- Impacts due to the establishment of servitude (easement resulting in loss of value of the immovable asset) – such impacts are not anticipated for lands within the Motorway's expropriation corridor. However, the relocation of existing infrastructure owned by other institutions that overlaps with the Project may require the establishment of servitude, either in addition to or instead of expropriation.

The identification of formal and informal users of the affected lands has been initiated by the SPV as part of this RPF and the data to be collected by the third-party consultants assigned by the SPV will be incorporated into the RAP.

Based on the outcomes of this study, a **Project Affected People (PAP) Database for Land Acquisition** will also be developed by the SPV as part of the RAP.

²² According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "*most jurisdictions accommodate joint ownership of properties, whether land or houses. Where two or more owners jointly own an affected plot of land or a building, these co-owners will jointly receive the compensation, which must be split between them, either equally or according to the number of shares they hold in the affected property*". This applies to lands and assets acquired by administrations in accordance with Turkish legislation as well.

3.1.1. Permanent Loss

Table 3-3 presents the affected neighbourhoods by the number of affected parcels, which will be permanently expropriated or acquired by KGM for the Project.

Table 3-3. Affected Neighbourhoods per Number of Affected Parcels (*)

Section	Province	District	Neighborhood	Number of Affected Parcels						Total	
				Private	Legal Entities	Public					
						Treasury	Pasture	Forest	Non-regis.		Road
KM 0-35	İstanbul	Silivri	Alipaşa	47	1				2	5	55
			Çeltik	144					1	6	151
			Sekizkumlar	3							3
			Yolçatı	31						1	32
			Sancaktepe	94		5			2	4	105
			Balaban	178	1	8			3	3	193
			Değirmenköy	137	1					8	146
			Gümüşyaka	65					2	6	73
	Tekirdağ	Marmara ereğlisi	Sultanköy	10						1	11
			Cedit Ali Paşa	15						3	18
			Yakuplu	108	3	5			3	9	128
			Türkmenli	8		1				2	11
			Çeşmeli(**)	44			2		1	9	56
		Çorlu	Seymen	112			2		2	20	136
Şahpaz	69		7					8	84		
Türkgücü	4		1					1	6		
Sub-total KM 0-35			16	1,069	6	27	4	0	16	86	1,208
KM 35-70	Tekirdağ	Marmara ereğlisi	Çeşmeli(**)	7						4	11
			Çorlu	Yenice	36					2	10
		Süleymanpaşa	Maksutlu	1					2		3
			Karaevli	36					1	4	41
			Husunlu	35	1	2			1	2	41
			Gazioğlu	230	6				4	12	252
			Köseilyas	61	1	2			2	4	70
			Kayı	85	2		1		1	8	97
			Eskicami	11						1	12
			Gündoğdu	97	4					6	107
			Aydoğdu	12	2						14
			Zafer	52	4	3			1	4	64
			Yağcı	86		1	2			18	12
Sub-total KM 35-70			12	749	20	8	3	0	32	67	879
KM 70-105	Tekirdağ	Süleymanpaşa	Seymenli	43	4	7	2	5	2	2	65
			Güveçli	39			1	2		3	45
			Nusratlı	27		4				1	32
			Karahisarlı	17	1			1	2	2	23
			Nusratfakı	47		4	2		2	7	62
			İnecik	96	2	2	2	4	2	6	114
			Akçahalil	54	1	1		8		5	69
			Kınıklar	6		2		4		2	14
		Malkara	Yenice	37	1	1		3	5	2	49
			Hereke	30					2	7	39
Ahievran	43					2	4	49			
Sub-total KM 70-105			11	439	9	21	7	27	17	41	561
Total			39	2,257	35	56	14	27	65	194	2,648

(*) These figures are based on current version of the expropriation plans and may change. Final confirmation is awaited from KGM and final figures will be presented in the RAP.

(**) This settlement falls within both KM 0 – 35 and KM 35 – 70 sections; however, it has been counted only once to avoid double counting.

Table 3-4 presents the affected neighbourhoods by the **expropriation area**.

Table 3-4. Affected Neighbourhoods per Expropriation Area

Section	City	District	Neighborhood	Expropriation Area (m ²)							Total
				Private	Legal Entities	Public Parcels				Road	
						Treasury	Pasture	Forest	Non-registered		
KM 0-35	İstanbul	Silivri	Alipaşa	334,914.30	169.00				5,635.76	6,644.52	347,363.58
			Çeltik	442,574.80					5,549.53	12,528.63	460,652.96
			Sekizkumlar	50,990.83							50,990.83
			Yolçatı	92,626.29						848.69	93,474.98
			Sancaktepe	130,129.11		2,890.43			2,908.26	2,551.11	138,478.91
			Balaban	740,597.26	590.94	4,737.14			17,291.70	10,987.43	774,204.47
			Değirmenköy	550,921.67	718.12					14,481.35	566,121.14
			Gümüşyaka	259,372.72					18,659.82	15,261.29	293,293.83
	Tekirdağ	Marmaraeğlisi	Sultanköy	89,727.52						1,074.18	90,801.70
			Cedit Ali Paşa	946,357.43						1,884.14	948,241.57
			Yakuplu	518,704.23	2,772.63	873.67			7,174.37	13,277.31	542,802.21
			Türkmenli	56,900.43		733.54				2,117.04	59,751.01
		Çeşmeli	413,204.19			85,123.94		3,573.18	16,023.62	517,924.93	
		Çorlu	Seymen	763,916.00			9,864.43		13,873.61	14,639.31	802,293.35
Şahpaz	405,727.41			2,635.74				5,036.69	413,399.84		
		Türkgücü	24,940.62		16,949.63				629.93	42,520.18	
KM 0-35 Total				5,821,604.81	4,250.69	28,820.15	94,988.37	0.00	74,666.23	117,985.24	6,142,315.49
KM 35-70	Tekirdağ	Marmaraeğlisi	Çeşmeli	57,193.25						32,681.85	89,875.10
			Çorlu	Yenice	294,136.73					15,379.71	81,704.63
		Maksutlu		8,170.46					15,379.71		23,550.17
		Süleymanpaşa	Karaevli	294,136.73					7,689.85	32,681.85	334,508.43
			Husunlu	285,966.26	8,170.45	16,341.00			7,689.85	16,340.93	334,508.49
			Gazioğlu	1,879,206.86	49,022.70				30,759.41	98,045.55	2,057,034.52
			Köseilyas	498,398.34	8,170.45	16,341.00			15,379.71	32,681.85	570,971.35
			Kayı	694,489.49	16,340.90		8,170.33		7,689.85	65,363.70	792,054.27
			Eskicami	24,511.39							24,511.39
			Gündoğdu	792,535.07	32,681.80				15,379.71	49,022.78	889,619.36
			Aydoğdu	98,045.58	16,340.90						114,386.48
			Zafer	490,227.88	32,681.80	24,511.50			7,689.85	40,852.31	595,963.34
		Yağcı	702,659.96		8,170.50	16,340.67		138,417.35	98,045.55	963,634.03	
KM 35-70 Total				6,119,678.00	163,409.00	65,364.00	24,511.00	0.00	261,455.00	547,421.00	7,181,838.00

Section	City	District	Neighborhood	Expropriation Area (m ²)							Total
				Private	Legal Entities	Public Parcels					
						Treasury	Pasture	Forest	Non-registered	Road	
KM 70-105	Tekirdağ	Süleymanpaşa	Seymenli	334,441.35	24,117.00	8,124.12	135,564.30	293,993.38	1,738.90	4,237.31	802,216.36
			Güveçli	262,393.06			23,100.58	9,235.44		6,134.97	300,864.05
			Nusratlı	133,348.62		1,152.88				9,900.00	144,401.50
			Karahisarlı	109,389.58	19,131.89			3,153.48	13,726.25	2,082.89	147,484.09
			Nusratfakı	489,680.09		3,568.64	17,590.10		5,886.23	8,535.37	525,260.43
			İnecik	664,329.69	5,973.42	1,021.19	71,406.55	103,877.13	5,055.30	11,686.49	863,349.77
			Akçahalil	310,805.57	10.58	737.27		252,202.81		6,145.24	569,901.47
		Kınıklar	59,085.28		1,318.06		94,728.14		877.93	156,009.41	
		Malkara	Yenice	241,036.26	21,510.52	1,743.94		166,323.76	12,050.85	7,525.46	450,190.79
			Hereke	311,204.49					2,264.10	19,570.35	333,038.94
			Ahievran	182,077.80					2305.78	6,420.89	190,804.47
KM 70-105 Total				3,097,791.79	70,743.41	17,666.10	247,661.53	923,514.14	43,027.41	83,116.90	4,483,521.28
Total				15,039,074.60	238,403.10	111,850.25	367,160.90	923,514.14	379,148.64	748,523.14	17,807,674.77

3.1.2. Orphan Lands

Some parcels are **partially expropriated** as required in accordance with the Expropriation Law of Türkiye.

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "**orphan land** (also referred to as "severed" or "unviable") is land that is not directly located within the project's direct footprint but becomes uneconomic as a result of land acquisition and should be acquired and compensated for as a result. There are guidelines in the legislation of many countries with regard to orphan land. In general, such land should be compensated in full. In terms of process, affected persons should be informed that orphan land can be eligible for compensation under certain conditions, and in such situations they should be able to lodge a specific claim for review by the project or the relevant agency. The project will generally benefit from establishing and disclosing clear criteria for eligibility of orphan land to acquisition and compensation."

In accordance with Project's avoidance strategy and following a proactive approach, the expropriation boundary for the Project has been established with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel. To this end, a parcel-based review and assessment covering the full alignment was carried out by KGM and the valuation contractor.

It should be noted that there is no formally defined threshold for this in KGM's procedures. However, practical approaches are applied by the directorates. The practice adopted by KÖSOB for this Project will be clarified through the engagement to be conducted as part of the RAP preparation process and will be reflected in the subsequent RAP accordingly.

For all parcels, in line with the Expropriation Law and KGM's established practice, KGM accepts official applications from affected people – submitted within **30 days** of receiving notice of expropriation by agreement – requesting the expropriation of orphan lands and evaluates each application on a case-by-case basis.

The RAP will present a list of orphan parcels based on the remaining area data provided in the expropriation plans.

3.1.3. Fragmented Parcels

As a result of expropriation, some parcels become **fragmented** into two or more sections, with the Motorway crossing between them. The leftover sections of fragmented parcels may also be considered orphan lands, depending on the size of the residual area, as described above.

Engineering structures that provide access between fragmented parcel sections are essential to avoid or minimize access difficulties. Such difficulties could result in increased costs and time requirements for agricultural production by users of the fragmented agricultural parcels.

The list of underpasses, overpasses, and culverts incorporated into the Project design to ensure agricultural users' access to their lands will be analysed and provided in the RAP. The number, distribution, and adequacy of these structures in ensuring that residents can access the opposite side of the road will also be evaluated as part of the RAP.

As outlined in Section 2.3.2, during Project implementation, the SPV, with KGM's approval, may provide additional structures within the expropriation corridor if needed – especially in response to requests from local communities, public authorities, or other stakeholders – to avoid land severance or restricted access resulting from the project. Nevertheless, during Project implementation, the SPV will implement the grievance mechanism and maintain ongoing engagement with the affected people, including users of fragmented parcels, to identify and resolve any issues.

Any feedback and/or requests received from affected people regarding land fragmentation, engineering structures, or related matters will be reviewed by the Project's design and construction teams and KGM on a claim basis. Where necessary and feasible, and subject to KGM's approval, **the SPV may incorporate additional structures into the design during the construction phase** to increase the number and frequency of crossings and further mitigate land-fragmentation impacts accordingly.

3.1.4. Affected Trees

Fruit and non-fruit trees are present on parts of the affected parcels, including those that are privately owned and state-owned. The valuation reports that are under preparation will include a list of affected trees for each affected private and public parcel, where applicable. The list of trees considered in the valuation is noted in the purchase agreement protocols signed by the affected persons who reach an agreement with KGM on the expropriation price.

The valuation and compensation method followed by KGM in the Project, in accordance with the Expropriation Law of Türkiye, is outlined in RPF Section 6.3.

The RAP will present information on trees affected on both private and public lands. Owners of the affected trees, whether formal or informal users of the land, will be eligible for compensation under the RAP.

3.1.5. Loss of Non-residential Structures

The affected non-residential structures on affected private and public parcels identified to date as part of asset inventory include the following.

- Canopy²³
- Barns
- Container
- Depot
- Fence
- Gate
- Henhouse
- Pool
- Shed
- Wall
- Water pump
- Well

The RAP will provide a list of all non-residential structures – whether located on private or public parcels and owned or used by formal or informal users – along the full alignment, based on the expropriation plans and valuation reports.

3.2. Affected Houses

The houses within the Motorway's expropriation corridor are identified in the expropriation plans. The RAP will present a list of houses – whether located on private or public parcels and owned or used by formal or informal users – based on the expropriation plans and valuation reports, and the findings of the RAP surveys to be conducted.

The available plans do not identify the categories of affected houses, such as masonry or brick houses, single- or multi-storey houses, vineyard houses, or prefabricated houses nor do they indicate their occupancy status or users (e.g. owners, formal tenants, or informal occupants).

The RAP field surveys will aim to conduct a **full census** of affected houses and seek to identify the following aspects related to the affected houses and the residing households:

- Type of house and occupancy status (e.g., permanent residence, non-permanent residence such as vineyard cottage or hobby house, seasonal/weekend house, etc., vacant building, uninhabitable building)
- Ownership and tenancy status of users (e.g., owner, formal tenant, informal user)
- Socio-economic conditions of the residing households, including ownership of secondary residences, household size, sources of livelihood, and any vulnerabilities among household members, if any
- Resettlement plans or alternatives that have been considered, if any at this stage.

²³ Structures with open sides, no doors or windows, and a roof, built on iron, wooden, or concrete columns, constructed to provide protection from rain and sunlight.

In line with practices common to many jurisdictions, some of the parcels affected by the Project may be under **joint ownership**, as also recognised in IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023). When two or more individuals share ownership of a parcel (plot of land) or a parcel that includes a structure, compensation from KGM is allocated among them in proportion to their registered shares. If the co-owners mutually agree and authorise payment to the household's resident owner, KGM transfers the compensation directly to that person. Obtaining such agreement, however, can prove difficult and may become prolonged or even inconclusive when there are numerous co-owners, conflicting interests, or absentee owners. A further concern with joint ownership is that the compensation corresponding to each individual's share may be too limited to secure an alternative property, which can expose households to the risk of homelessness. Potential for such impacts will be assessed as part of the RAP, and relevant entitlements will be defined accordingly.

3.3. Impacts on Vulnerable People

Please refer to Chapter 12.

3.4. Temporary E&S Impacts during Construction

The potential health and safety risks and impacts of construction activities on local communities, such as noise, vibration, air quality, and community health and safety, are addressed in the Project's ESIA. E&S avoidance and mitigation measures will be implemented by the EPC Contractor. These measures, such as dust suppression, mitigation of blasting impacts through optimised blasting design, vibration monitoring, and construction traffic management, will be carried out in accordance with the Project's ESIA, the Environmental and Social Management Plan (ESMP), and relevant subject-specific E&S management plans.

To manage and resolve such impacts during the construction phase, the SPV will implement the **Project's grievance mechanism** in accordance with the SEP.

With regard to potential impacts on residential structures, particularly those related to blasting and vibration, the SPV will monitor any damage arising from blasting and implement mitigation measures and/or corrective actions, in accordance with the Project's ESIA.

3.5. Potential E&S Impacts during Operation

In addition to houses located on parcels within the expropriation corridor, residual impacts during the operation phase, such as noise and risks to community health and safety, may be significant and may necessitate the physical displacement of certain houses situated outside, but in close proximity to, the expropriation corridor.

Construction and operation phase impacts on these houses, including potential loss of property value, noise, vibration, and effects on household livelihoods, will be identified through periodic E&S **monitoring, stakeholder consultations** and **Project's grievance mechanism**.

The grievances raised during the **operation phase** will also be tracked by the LESA as part of their periodic E&S monitoring studies. If a grievance results in a confirmed finding of damage or risk to the affected households, appropriate measures will be undertaken in accordance with the principles of this RPF and subsequent RAP, and in consultation and agreement with the Lenders.

3.6. Other Issues

3.6.1. Displacement of Existing Infrastructure Belonging to Other Institutions

KÖSOB initiated consultations with relevant institutions in 2023 through official correspondence, based on the 1/5,000-scale route, to identify existing and planned infrastructure facilities (e.g. energy transmission lines, drinking water, wastewater and stormwater systems, natural gas pipelines, etc.) that overlap with the Project. Currently, the consultations and correspondence are ongoing based on the 1/1,000-scale route.

In addition to official correspondence, verbal consultations with the relevant institutions are ongoing regarding their existing and planned infrastructure and above ground facilities that intersect with the Motorway route.

Based on the information received from each institution, the need for displacement is assessed and intersection points with the route are determined. At the next stages, with the provision of additional data, the intersections of existing and planned infrastructure with the Project route will be finalised, and subsequently, corresponding displacement projects will be prepared and submitted for approval. This is a **dynamic process** that will continue throughout the Project duration, which is carried out in constant coordination with the institutions.

The Institutions consulted and collaborated through this process are listed below:

- Potable Water Pipelines:
 - Directorate of State Hydraulic Works (DSİ)
 - Istanbul Water and Sewerage Administration (ISKİ)
 - Tekirdag Water and Sewerage Administration (TESKİ)
- Electricity Lines:
 - Türkiye Electricity Distribution Company (TEDAS) – Regional Directorate
 - Türkiye Electricity Transmission Company (TEİAŞ) – Regional Directorate
 - Uludağ Gas Distribution Company (UEDAŞ)
 - Trakya Gas Distribution Company (TREDAS)
- Natural Gas Pipelines:
 - Petroleum Pipeline Corporation (BOTAS)
 - ÇORDAŞ Çorlu Natural Gas Distribution Company (ÇORDAŞ)
 - GAZDAŞ Trakya Natural Gas Distribution Company (GAZDAŞ)
- North Atlantic Treaty Organization (NATO) Lines
- Telecommunication and Fiber Cable Lines:
 - Turkcell Communication Services Company
 - Türk Telekom Regional Directorate
 - Vodafone Telecommunications Company

Displacement Protocols

For infrastructure identified for displacement, protocols will be signed between the Project and the relevant institutions. These protocols will outline the displacement procedures to be implemented and the technical specifications to be fulfilled. During Project implementation, the existing infrastructure intersected by the Motorway will be displaced – i.e., disconnected or removed and subsequently reinstalled or reconnected at the same location within the Motorway's expropriation corridor, so that it remains beneath the road alignment – in accordance with the conditions of corresponding protocols.

Where necessary, permanent protection measures will be developed and implemented by the SPV and EPC Contractor, in coordination with the relevant institutions and subject to approval by KGM. These measures may include the application of suitable protective materials (e.g., soil or concrete) or increasing the diameter of the replacement pipes to enhance durability. The relevant institutions may impose additional technical requirements regarding the specifications of the infrastructure to be reconstructed, restrictions on the use of explosives, or the need for technical supervision during displacement works. These requirements will be implemented by the Project.

In this process, the Project's primary objective is to carry out the displacement works – provided sufficient space is available and technically feasible – within the Motorway's expropriation corridor, thereby avoiding additional expropriations with the approval of KGM. However, if there are facilities within the expropriation corridor that cannot be displaced there, such facilities will be relocated outside the expropriation area, to locations deemed appropriate and designated by the authorities and KGM. After obtaining the necessary permits and completing land acquisition, they will be re-established.

Land Acquisition for Infrastructure Displacement

Any **additional land requirements** along the displacement routes will be addressed by KGM through land acquisition procedures in accordance with national legislation. This process will include preparation of expropriation plans in case of private lands, securing land ownership (through allocation, expropriation or easement rights, as appropriate) and obtaining the necessary permits (e.g., forest permits) for the new locations and routes.

Where needed, the SPV will prepare a RAP Addendum in consultation with the Lenders and LESA and ensure that affected persons receive entitlements consistent with this RPF and RAP - Entitlements Matrix. This approach will ensure that the land acquisition and resettlement process is fully aligned with Lenders' standards.

In case of **Overhead Transmission Lines**, in accordance with national legislation and the standard practices of TEIAS, areas beneath underwire alignments – where easement rights have been established – are not subject to usage restrictions; however, tree planting is prohibited, and construction is permitted only under specific health and safety conditions defined by TEIAS.

Notification of Local Communities

The notification of the local communities to be affected by interruption of services will be managed by the SPV and the EPC Contractor through implementation of Project SEP in coordination with KGM and related institutions/service providers.

Environmental, Health and Safety (EHS) Risks and Impacts associated with Displacement of Existing Infrastructure

Besides land acquisition, relocation of existing infrastructure elements may result in community impacts, including service disruptions, construction-related nuisances, and land acquisition-related effects. The management of these potential EHS impacts, as well as associated stakeholder engagement activities, will be conducted in accordance with the Project's E&S management plans and in consultation with relevant stakeholders.

3.6.2. Cumulative Land Acquisition and Resettlement Impacts

Cumulative land acquisition impacts may arise when landowners or users are affected by multiple, overlapping land-related acquisitions linked to other developments in the region or directly to the Project. Households affected by Project's cumulative land acquisition impacts will be considered among the vulnerable groups, as discussed in Chapter 12.

The following categories describe groups who may be particularly vulnerable to such cumulative impacts:

- (i) **Lands affected by other regional developments and projects:** People whose land or livelihoods are impacted by additional infrastructure or development projects in the same region may experience cumulative displacement effects.
- (ii) **Lands affected by both the Motorway and ancillary Project facilities:** People whose assets are affected by the main Motorway project as well as associated facilities located outside the Motorway's expropriation corridor – such as construction camps, facilities or storage sites – may face cumulative land acquisition impacts.
- (iii) **Land owners or users with multiple parcels affected by the Project:** People who own or use more than one parcel of land affected by various components of the Project may face cumulative impacts, increasing their overall exposure to loss of land, assets, and sources of income.

The RAP surveys to be conducted following the RPF will include questions aimed at identifying households that may be subject to cumulative land acquisition impacts. Based on the data obtained through RAP surveys, an assessment of the parcels that are cumulatively affected under each category will be done as part of the RAP by using geographical information system (GIS) tools and through analysis of the expropriation plans of the Project.

3.6.3. Gender Impacts and Gender-based Violence and Harassment (GBVH) Risk

According to the Constitution of the Republic of Türkiye, men and women have equal rights, including the right to own and inherit property. In practice, women in Türkiye do own and inherit land. The Expropriation Law does not contain specific provisions for women, as its implementation is intended to apply equally to all rightsholders, regardless of gender.

The SPV has adopted in the Project, Limak Group of Companies' relevant corporate policies and principles addressing gender aspects, protecting women's rights and promoting gender equality and equal opportunities particularly in the workplaces.

The SPV has adopted the relevant corporate policies and principles of the Limak Group of Companies that address gender issues, safeguard women's rights, and promote gender equality and equal opportunities – particularly within the workplace. These policies demonstrate the Group's commitment to fostering an inclusive and respectful working environment. The key adopted policies include (as of November 2025):

- Code of Ethics²⁴
- Corporate Equality Policy
- Policy of Combatting Domestic Violence
- Stakeholder Involvement and Suggestion Complaint Policy
- Zero Tolerance Policy against Violence and Sexual Inviolability
- Procedure for Combatting the Violence and Violation of Sexual Inviolability

While the Constitution of the Republic of Türkiye secures the rights of women and the Project will implement corporate policies, if not managed effectively, the land acquisition and resettlement processes associated with the Project may disproportionately impact women and exacerbate gender inequalities.

According to *Addressing GBVH in the Construction Sector (Social Development Direct, 2020 – supported by EBRD, CDC, and IFC)* and *Emerging Good Practice for the Private Sector on Addressing Gender-Based Violence and Harassment (GBVH) (jointly commissioned by IFC, EBRD, and CDC Group, 2020)*, the risks of GBVH associated with land acquisition processes may include the following:

- Individuals who make decisions about resettlement and compensation can abuse this power to sexually exploit vulnerable community members, such as those in female-headed households. This risk is exacerbated in places where women cannot legally hold land titles and are therefore more easily removed from their land.
- Workers may be required to consult community members on plans for a project. In some cases, for example, when land acquisition and resettlement processes are required, this can involve workers having considerable power over the allocation of resources, such as compensation and livelihood restoration.
- Community engagement processes (for example during resettlement) can provide opportunities for workers to sexually exploit community members on the basis that it will improve their access to resources. This risk is heightened where community members are poor and/or already face discrimination.

Field consultations and interviews to be conducted as part of RAP process will identify gender-specific impacts that may be experienced by women affected by displacement. While the loss of residential structures and agricultural land affects all household members, the social and economic vulnerabilities of women – particularly widows, elderly women, women with disabilities, and caregivers – will be paid specific attention. The RAP will include a summary of the gender-related risks and considerations associated with land acquisition, as identified through women's consultations to be conducted during the RAP surveys.

²⁴ <https://www.limak.com.tr/files/CodeofBusinessEthicsPolicy.pdf>

3.6.4. Affected Cultural Heritage (including Graves)

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "Where a project affects critical cultural heritage, or where cultural heritage impacts are significant, the project may need to prepare a Cultural Heritage Management Plan under PS8. The requirement for such a plan would be determined as part of the ESIA. Where cultural heritage impacts are relatively minor, or only of local significance, they may be addressed in the RAP."

According to the Project's ESIA Report (March 2025), registered and non-registered cultural heritage sites located inside and outside the expropriation corridor were identified by the ESIA Consultant (cultural heritage team). **The SPV design and E&S teams** have confirmed that the necessary avoidance measures have been implemented (such as a minor route revision at KM 6+800 and an interchange revision at the Tekirdağ East Interchange Area). As a result, only the following cultural heritage sites currently remain within the expropriation corridor, and there are **no** graves or graveyards requiring relocation under the current design:

- HRM-7 (multi-stratigraphy mound) at KM 10+900 – 11+500
- HRM-8 (settlement) at KM 16+600

The expropriation plans reviewed as part of this RPF do not identify any cultural heritage sites, including graves or graveyards, within Project's expropriation corridor. As part of the RAP study to be conducted following this RPF, additional expropriation documentation of the route and permitting documentation of the temporary facilities will be further reviewed to identify any cultural heritage sites that may be subject to relocation, if any, or confirm that there will be no displacement impact on cultural heritage sites or assets.

As required by IFC PS8, a **Cultural Heritage Management Plan and Chance Find Procedure** has been prepared by the ESIA Consultant as part of the ESIA Report, to address and manage potential impacts on the cultural heritage sites. Any relocation activities required by the cultural heritage authorities will be undertaken in accordance with this Plan.

3.6.5. Potential Additional Expropriation Works

The Project may require further land acquisition beyond the currently defined expropriation corridor, either during construction or, on a limited basis, after commissioning. This may result from factors such as ongoing design optimisation or modifications – subject to approval by KGM and may include the following:

- Technical requirements during construction to ensure motorway safety and stability (e.g. additional slope stabilization at embankments, drainage infrastructure for surface runoff, etc.)
- Requests from affected people for additional underpasses, overpasses, or culverts that are feasible to incorporate into design and construction
- Relocation of existing infrastructure belonging to other institutions (e.g. overhead transmission lines, gas pipelines)
- Significant environmental and social impacts that may arise during the operation phase

Any such additional land acquisition will be conducted in accordance with the provisions of this RPF and the subsequent RAP. In such cases, as needed, RAP addendum documents will be prepared and implemented by the SPV, in collaboration with KGM, in accordance with the principles outlined in this RPF and subsequent RAP to address any specific displacement impacts. These addenda will be developed once the expropriation plans are available and approved by KGM.

The SPV will promptly provide written notification of any unanticipated resettlement impacts that occur during construction, implementation, or operation which were not foreseen in this RPF or the subsequent RAP.

The SPV will also inform the Lenders of such risks and impacts with a detailed description of the issue and proposed corrective actions.

4. Institutional and Legal Framework

4.1. Institutional Framework

The administrative structure in Türkiye comprises the central administration (“*merkezi idare*”) and local administrations (“*yerinden yönetim*”). The central administrative units that have responsibilities related to the Project – particularly in terms of land acquisition and the implementation of the RAP – are outlined in the chart given in Figure 4-1. The chart shows the institutional structure of key government bodies under the Presidency of the Republic of Türkiye relevant to Project oversight, including five key ministries with their respective directorates and field organizations.

In line with the Constitution of the Republic of Türkiye, the central administration has the power of administrative tutelage over the local administrations in the framework of principles and procedures set forth by law with the objective of ensuring the functioning of local services in conformity with the principle of the integrity of the administration, securing uniform public service, safeguarding the public benefit and meeting local needs properly.

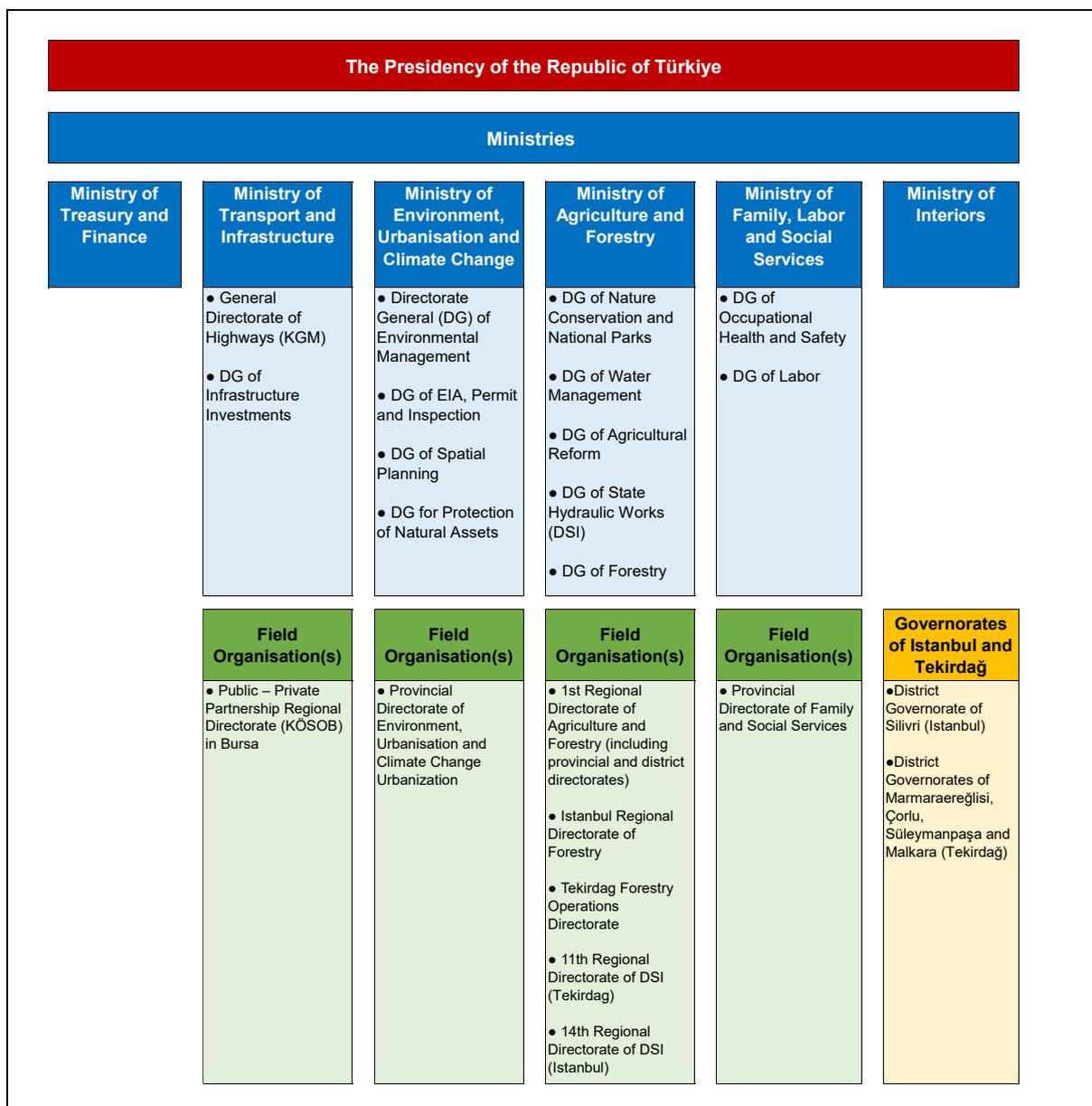


Figure 4-1. Institutional Framework relevant to the RAP – Central Administration

Ministries are the core governmental bodies of the central administration. Ministries are headquartered in Ankara and they have regional, provincial and district directorates which function as their field organisations. Provincial directorates of the ministries report to the Governorates. The **Ministry of Transport and Infrastructure (MoTI)**, represented by the **KGM**, is the key institutions for the planning, permitting and development of the Project.

Türkiye is administratively divided into 81 provinces, based on geographical characteristics, economic conditions, and public service needs. Provinces (“*il*” or “*şehir*”) are further divided into lower levels of administrative units namely, districts (“*ilçe*”), neighbourhoods (“*mahalle*”) in metropolitan municipalities and villages (“*koy*”) in non-metropolitan municipalities. There are also localities (“*bağlı*” or “*mezra*”), which are small settlement areas connected to villages.

In Türkiye, the municipal system is structured into three main categories: metropolitan municipalities with their affiliated metropolitan district municipalities; provincial (non-metropolitan) municipalities with district municipalities; and town (*belde*) municipalities. These municipalities are primarily responsible for delivering public services to local communities in their respective jurisdictions. Pursuant to the Law on the Establishment of Fourteen Metropolitan Municipalities and Twenty-Seven Districts, and Amendments to Certain Laws and Decree Laws (Law No. 6360, 2012), the legal status of villages located within the boundaries of metropolitan municipalities was abolished and these settlements were reclassified as neighbourhoods. Following the enactment of Law No. 6360 (2012), the number of metropolitan municipalities increased to 30, and special provincial administrations in provinces granted metropolitan municipality status were abolished. Additionally, town municipalities located within metropolitan municipality boundaries were dissolved and reclassified as neighbourhoods. At the local level, the administrative structure is represented by elected metropolitan and district municipality mayors (“*belediye başkanı*”) and elected heads of neighbourhoods or villages (“*mukhtar*”), who act as key figures in local governance and public service coordination.

İstanbul and **Tekirdağ** provinces are governed by metropolitan municipalities. Therefore, all settlements within the districts of **İstanbul** and **Tekirdağ** are classified as neighbourhoods; there are no villages or hamlets within the administrative boundaries of these cities. Under the jurisdiction of the İstanbul and Tekirdağ metropolitan municipalities, the following district municipalities are responsible for administering the neighbourhoods affected by the project-related land acquisition:

- **İstanbul:** Silivri District Municipality
- **Tekirdağ:** Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara District Municipalities

Contracting (Granting) Authority – KGM

KGM is the responsible authority for conducting expropriation procedures related to BOT motorway projects. These procedures are carried out through two main entities:

- The Department of Immovables under the KGM, and
- The Regional Directorates – Immovables Chief Engineering Departments, which report directly to the Directorate General.

These departments are responsible for the following technical and administrative tasks:

- Preparation of expropriation plans based on the final design of the project
- Preparation of zoning sheets to support necessary zoning modifications
- Development of forest permit and easement plans
- Preparation of valuation maps and execution of valuation studies
- Execution of expropriation procedures and official correspondence
- Management of immovable property records and disposition processes
- Execution of procedures and activities related to borrow sites and pits

To support the valuation process, private topographical mapping firms are engaged through service procurement tenders. Since 2002, KGM has issued tenders titled “*Immovable Valuation Engineering Services*” to procure the necessary valuation data for expropriation routes. The selected engineering firms must carry out these services in accordance with the **KGM Technical Specifications for the Services to be Procured for the Valuation of Immovables**, issued in February 2019 (hereinafter referred to as the “*Valuation Technical Specifications*”).

Responsibilities of KGM under the Expropriation Law

KGM's responsibilities in the implementation of land acquisition processes, in accordance with Türkiye's Expropriation Law, are summarized below. (For detailed implementation arrangements, refer to Chapter 14):

- Establishing valuation and negotiation commissions, subject to approval by the Directorate General
- Conducting valuation of land, immovable assets, trees, and crops, as applicable
- Sending invitation letters to affected right holders in accordance with Article 8 of the Expropriation Law
- Engaging in consultation and negotiation with affected right holders as stipulated in Article 8
- Processing payments for expropriation costs, as approved by the Directorate General
- Transferring title deeds of lands and assets acquired through consent agreements
- Initiating court proceedings where consent cannot be obtained
- Making court-ordered payments and conducting title deed transfers for such cases
- Evaluating applications for orphan lands (unclaimed or abandoned properties)
- Ensuring timely allocation of acquired lands (after necessary permits are secured) to the SPV to align with the construction schedule
- Managing requests and grievances from affected people in compliance with the Expropriation Law
- Undertaking additional measures or actions required by project developments
- Collaborating with the SPV on issues such as stakeholder engagement, grievance management, monitoring of RAP implementation, and data exchange, in line with international resettlement standards

KGM has a **Public – Private Partnership Regional Directorate (KÖSOB – Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü)** headquartered in Bursa Province²⁵. The Project falls within the responsibility area of the KÖSOB. The organisational structure, roles, and responsibilities of this Unit, particularly in relation to the implementation of the RAP, are detailed in Chapter 14 of this document.

²⁵ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx>

4.2. National Legislation

4.2.1. Constitution of the Republic of Türkiye

The Constitution of the Republic of Türkiye serves as the fundamental legal basis for the expropriation of land. Article 46 establishes the constitutional framework for the expropriation process, stipulating that private property may only be expropriated for public interest purposes, in accordance with due process, and upon the condition of prompt and fair compensation. The article ensures that all expropriation procedures are carried out within the limits prescribed by law, thereby safeguarding property rights while enabling the state to meet public service and infrastructure needs.

Article 46²⁶ –*The State and public corporations shall be entitled, where the public benefit requires, to expropriate privately owned real estate wholly or in part and impose administrative servitude on it, in accordance with the principles and procedures prescribed by law, provided that the actual compensation is paid in advance.*

The compensation for expropriation and the amount regarding its increase rendered by a final judgment shall be paid in cash and in advance. However, the procedure to be applied for compensation for expropriated land for the purposes of carrying out agriculture reform, major energy and irrigation projects, and housing and resettlement schemes, afforestation, and protecting the coasts, and tourism shall be regulated by law. In the cases where the law may allow payment in instalments, the payment period shall not exceed five years, whence payments shall be made in equal instalments.

Compensation for the land expropriated from the small farmer who cultivates his/her own land shall be paid in advance in all cases. An interest equivalent to the highest interest paid on public claims shall apply in the instalments envisaged in the second paragraph and expropriation costs not paid for any reason.

4.2.2. Expropriation Law of Türkiye (No. 2942, 1983)

The expropriation process in Türkiye is governed by the Expropriation Law (Law No. 2942, enacted in 1983). A summary of the procedures implemented by the KGM in accordance with this Law is provided in Figure 4-2. A detailed description of the relevant legal provisions can be found in [Appendix A](#).

The SPV will work in coordination with KGM, offering support to ensure that the land acquisition and resettlement process aligns with applicable international standards.

The Law establishes the principles and procedures for the following actions:

- Expropriation of immovable assets owned by private individuals, legal entities, the State, or public institutions, when deemed necessary for the public interest
- Calculation of expropriation values
- Registration of immovable assets or servitude (easement) rights in the name of the authorised expropriating administration (in this case KGM)
- Reclamation of immovable assets that have not been utilised for the intended purpose
- Transfer of immovable assets between government administrations
- Resolution of disputes arising from mutual rights and reciprocal obligations governed by the Law.

Recognition of Rights (Eligibility under Law)

The Law explicitly recognises the rights of the following groups:

- Individuals or entities with formal legal rights to land (e.g., titled landowners or shareholders)
- Formal users of state-owned lands, such as those who pay occupancy fees (“*ecrimisil*”) for using Treasury land or who have registered fixtures/structures (“*muhdesa*”) on Treasury lands
- Individuals with customary or possession-based rights, referred to as possessors (*zilyet*).

²⁶ <https://www.anayasa.gov.tr/en/legislation/turkish-constitution/>

Compensation for Possessors

In relation to compensation for structures and trees belonging to informal users (*zilyet*) of affected lands (excluding forest and pasture lands), **Article 19** stipulates:

*“For the expropriation of titled lands belonging to others, unclaimed lands, and/or lands not formally acquired by the possessor, the **minimum material cost** (Asgari levazım bedeli) of buildings and the value of trees – as determined in accordance with Article 11 – shall be paid to the possessor (zilyet).”*

Compensation for Crops

Regarding crops, Article 20 outlines:

*“**Evacuation of cultivated lands that are subject to expropriation shall be carried out at the end of the harvesting period.** If postponing the evacuation is not feasible, the expropriating authority (in this case KGM) may proceed with evacuation **on the condition that compensation for standing crops is paid**, based on values determined by the courts. Where the value of crops is already included in the valuation conducted pursuant to Articles 11 and 12, it is not necessary to reassess or separately compensate for the crops.”*

Prioritisation of Purchase through Negotiated Settlement over Judicial Expropriation (Article 8)

In expropriations to be carried out by the administrations under the Law regarding immovable properties registered in the land registry, it is essential to **primarily apply the procurement (purchase) procedure** through negotiated settlement.

In this Project, KGM has prioritised negotiated settlement and purchase through the Article 8 process aiming to ensure that property transfer is done with the owners' consent, reduce legal disputes, and speed up the process.

Accordingly, KGM considers filing lawsuits for the following instances – in line with the construction schedule and depending on the current expropriation budget available for payment to right holders:

1. When the negotiations between the immovable property owners and the expropriation commission **do not result in an agreement**;
2. When the **owners or shareholders do not attend the negotiation meetings** despite receiving official invitations from KGM;
3. When the owners or shareholders attend the negotiation meetings but **refuse to sign agreement protocols**; or;
4. When the parties agree on the compensation amount, **but there are annotations or declarations on the title deed that prevent the transfer, or when inheritance procedures have not been finalised**, title registration cannot be completed under the negotiated settlement process defined in Article 8. As a result, such cases do not conclude with a formal agreement protocol.

It should be noted that, in certain circumstances, right holders may be open to reaching a negotiated settlement. However, **various other obstacles may hinder the finalisation of such agreements**. Consequently, agreement rates or the number of lawsuits should be interpreted alongside other contextual factors, which may include the following:

- The existence of annotations such as mortgages, liens, or enforcement orders on the title records of the immovable property subject to expropriation, unresolved inheritance transfers, or ongoing court cases concerning the property (such as cadastral boundary or area correction cases, title cancellation and registration cases, and guardianship cases) constitute legal barriers to negotiated settlement.
- When **immovable properties located in the expropriation area are large in size and co-owned by multiple shareholders**, the structures and land on these properties are used by the shareholders according to informal divisions they have arranged among themselves. The inability of shareholders to reach consensus among themselves during negotiation meetings significantly reduces the rate of settlement.

In practice, such cases necessitate the application of the Article 10 or Article 27 (followed by Article 10) process by KGM in accordance with the Law and as a last resort, once all right holders have been invited to negotiation meetings under Article 8, and these negotiations with the participating landowners have been exhausted and ultimately failed.

Accelerated Expropriation (Article 27)

A **Presidential Decree** (Decision Date: 12 April 2023, No. 7060) concerning the **Accelerated Expropriation** of certain immovable properties under the scope of the Project (located within the settlements covered by the Decree) by the KGM in line with Article 27 of the Expropriation Law of Türkiye (Law No. 2942, 1983) was published in the Official Gazette²⁷ (No. 32162) on **13 April 2023** (referred to as **Accelerated Expropriation Decision**).

As per Article 27 of the Expropriation Law, immovable property subject to expropriation may be seized through accelerated expropriation under the following three circumstances:

- When the President issues a decision declaring a need for national defense, within the scope of the Law on National Defense Obligations (Law No. 3634);
- In situations of emergency, as determined by Presidential decision; or
- In extraordinary circumstances, as stipulated in special laws.

In such cases, upon the request of the relevant administration (in this case KGM), a court may authorise the seizure of the immovable property in accordance with the principles set forth in Article 10, provided that **all procedures except for valuation are completed at a later stage**.

The full text of Article 27 is provided in [Appendix A](#). Figure 4-2 provides a flow chart summarising the expropriation process – through Article 8, Article 10 and Article 27 – implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983). The figure presents both the regular procedure (Article 8) and the court-led process (Article 10), as well as the steps involved in accelerated expropriation under Article 27, as the Project has in place an Accelerated Expropriation Decision issued by the President of Türkiye. The roles of the relevant institutions, key procedural steps, applicable legal deadlines, and decision-making authorities are illustrated, highlighting the sequence of actions required when there is disagreement over compensation value, and how accelerated land entry is enabled under Presidential decree.

As presented in Figure 4-2, under the Article 27 process:

- Following the initiation of an Article 27 court case, the court determines the **Land Seizure Value**, which is then deposited into the bank accounts of the landowners or shareholders before a **Land Seizure Decision** is issued and the right of physical entry to the land is granted by the court.
- Following the execution of Land Seizure Decisions, affected owners and shareholders, including heirs of deceased owners, are informed of the process outcomes through the following methods:
 - A copy of the Article 27 Land Seizure Decision is issued and delivered by the relevant court to the respective owners and shareholders, as well as to the concerned bank and land registry office. This decision states that the Land Seizure Decisions have been executed by the court and confirms that the compensation amounts deposited are immediately available for withdrawal upon application by the rightful owners.
 - The case process and outcome can be followed by each citizen via the e-Government portal.
 - If a phone number is registered on e-Government, affected parties can receive short messages regarding the updates.
- Landowners may access the compensation amount for land seizure only if the shareholders for the respective parcels are known. However, if there is a mortgage, lien, or enforcement order on the property, the expropriation compensation cannot be collected.
- Following the Land Seizure Decision, Article 10 court cases – for the establishment of the Final Expropriation Value by the court and title registration of the property on behalf of the administration – are filed by the administration (in this KGM) in accordance with the Expropriation Law.
- If the **Final Expropriation Value** determined by the court through Article 10 process exceeds the initially determined **Land Seizure Value**, the affected owners and shareholders will be paid the difference (i.e., the set-off between the Land Seizure Value and the Final Expropriation Value) at the conclusion of the Article 10 process.
- **The SPV obtains legal access to the land after the Article 27 Land Seizure Decision of the court**, regardless of whether the Article 10 process has commenced. Following Article 27 Land Seizure Decision, KGM initiates Article 10 court cases within a reasonable period of time as recognised under the regulatory framework. Context to complete full acquisition of land rights and ensure timely access of right holders to the full compensation amounts.

²⁷ <https://www.resmiazete.gov.tr/eskiler/2023/04/20230413-6.pdf>

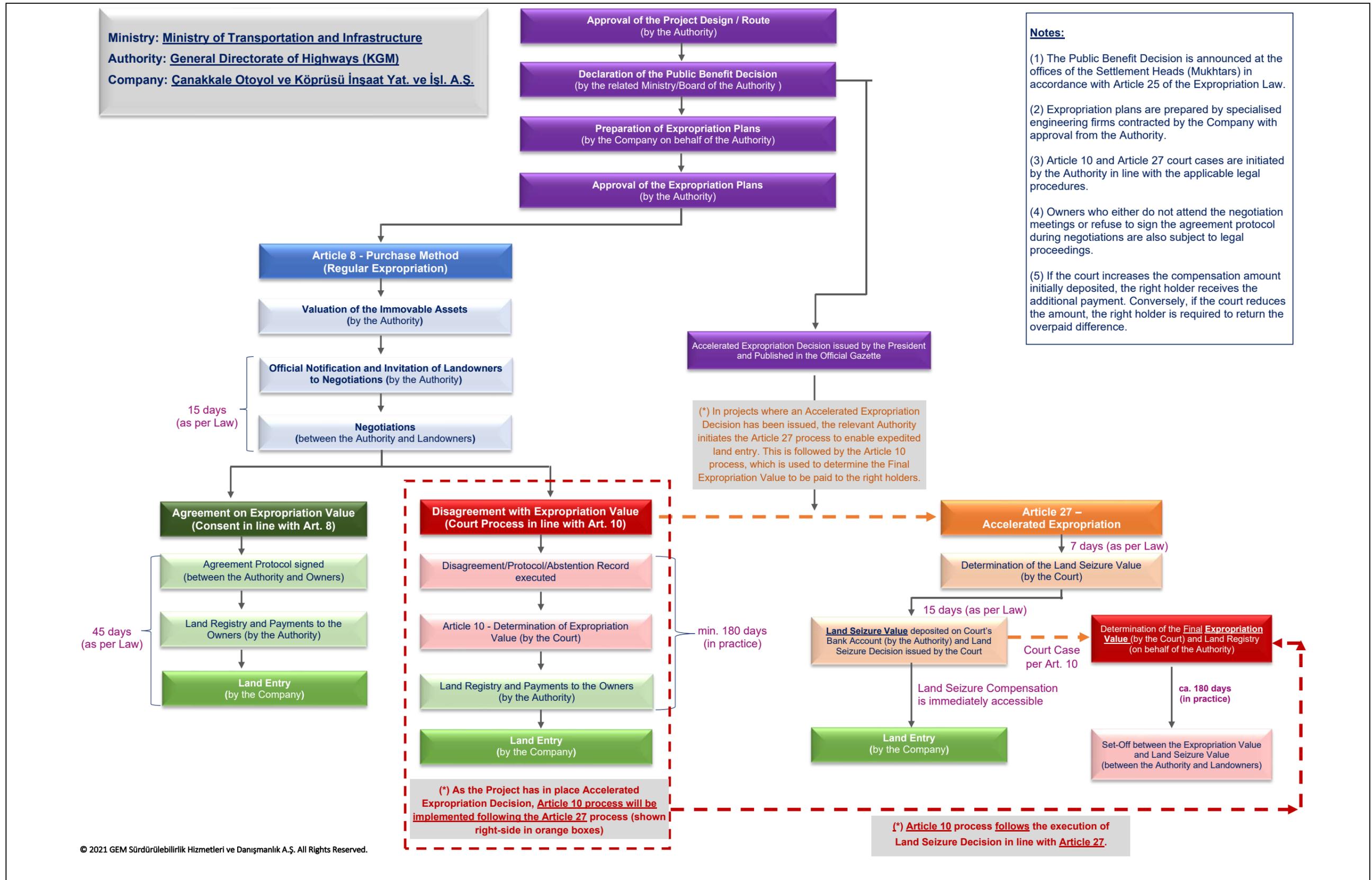


Figure 4-2. Summary of the Expropriation Process implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983)

4.2.3. Resettlement Law of Türkiye (Law No. 5543, 2006)

Resettlement activities in Türkiye are governed by the Resettlement Law (Law No. 5543, 2006) and the associated Regulation for the Execution of the Resettlement Law (please refer to [Appendix A](#)). This legislation provides for government-assisted resettlement in rural and urban areas and is primarily applied in large-scale infrastructure projects, such as dam developments, which may require the relocation of entire settlements, including district centres. The Resettlement Law is implemented by the Ministry of Environment, Urbanisation and Climate Change (MoEUCC) and the institutions authorized under its mandate.

The Resettlement Law is not applied to motorway projects implemented by the KGM, as these projects typically involve the physical displacement of a relatively limited number of structures, dispersed across distinct locations along the project alignment. In such cases, cash compensation is provided by KGM in accordance with the provisions of the Expropriation Law (Law No. 2942, as amended).

For this Project, the Resettlement Law is considered not relevant as the relocation or resettlement of affected households and businesses, including both owners and users, will be carried out in line with the Expropriation Law, implemented by KGM. This process will be conducted in collaboration with the SPV through the implementation of this RPF and subsequent RAP.

4.2.4. Other Laws relevant to Land Use, Acquisition, and/or Registration

The following laws contain provisions related to **land use, land acquisition, and/or land registration**, which may be applicable to the Project. A summary of the key provisions of each relevant law is provided in [Appendix A](#):

- Agricultural Reform Law on Land Arrangement in Irrigated Areas (No. 3083, 1984)
- Cadastral Law (No. 3402, 1987)
- Forest Law (No. 6831, 1956)
- Land Registry Law (No.2644, 1934)
- Law on Preventing Intrusion or Possession of Immovable Property (No 3091)
- Law on the Protection of Personal Data (Law No. 6698, 2016).
- Law on Soil Conservation and Land Use (No. 5403, 2005)
- Notification Law (No. 7201, 1959)
- Pasture Law (No. 4342, 1998)
- Real Estate Tax Law (No. 1319, 1970)

4.3. International Standards

The international standards applicable to the Project include the following:

- International Finance Corporation (IFC) Performance Standards (PSs) (2012)
- Equator Principles (EP) 4 (2020)
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the “Common Approaches” adopted in 2012 and revised by the OECD Council in 2016 and 2024).

The specific requirements of the respective international standards relevant to the development and implementation of the RPF and RAP are described in the following sections.

4.3.1. IFC Policy on E&S Sustainability

The Project will be implemented in compliance with the International Finance Corporation’s (IFC) Policy on Environmental and Social Sustainability and the associated Performance Standards (PSs). Among the eight Performance Standards adopted by the IFC, the following are of particular relevance to the development and implementation of this RPF and subsequent RAP:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- In addition to the core Performance Standards, the development of this RPF and subsequent RAP has also drawn upon a range of relevant good practice notes, guidance materials, and advisory documents published or endorsed by the IFC. These include:
- IFC’s Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023)
- Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector (prepared by Social Development Direct; supported by EBRD, CDC, IFC, 2020)
- Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
- IFC’ Good Practice Note on Addressing Grievances from Project-Affected Communities (2009)
- The Handbook for Preparing a Resettlement Action Plan of the IFC (2002)

4.3.2. Equator Principles 4 (2020)

The Project will be implemented in compliance with the fourth version of the Equator Principles (EP4, July 2020), which has been mandatory for all Equator Principles Financial Institutions (EPFIs) for any new Projects (including those with signed term sheets or mandates) as of 1 October 2020.

Among the ten principles outlined in EP4, the relevant provisions – particularly those related to **stakeholder engagement and grievance mechanisms** – have been taken into consideration during the development of the RAP and will be applied throughout its implementation.

Relevant guidance notes published under the Equator Principles and applicable to the development and implementation of the RAP include the following:

- EP Guidance Note on Implementation of Human Rights Assessments Under the EP (2020)

4.3.3. OECD Common Approaches (2024)

The Project will be implemented in compliance with the Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (“the Common Approaches”), which was adopted on 28 June 2012 and revised by the OECD Council in 2016 and 2024, which sets common approaches for undertaking E&S due diligence to identify, consider and address the potential E&S impacts and risks relating to applications for officially supported export credits as an integral part of Members’ decision-making and risk management systems.

As part of this framework, the Common Approaches require the identification of both potential positive and negative social impacts, including those related to land acquisition and involuntary resettlement.

Projects that involve **land acquisition and the involuntary resettlement** of a significant number of affected people are included in the illustrative list of Category A projects, as presented in Annex I of the Common Approaches.

4.3.4. Gap Analysis between National Legislation and International Standards

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Avoidance and Minimisation of Displacement and Assessment of Alternatives	The client will consider feasible alternative project designs to avoid or minimize physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.	The Expropriation Law of Türkiye does not include specific provisions.	<p>Although the Expropriation Law does not include explicit provisions regarding displacement, the expropriating authority (i.e. KGM) takes the displacement impacts of projects into account during site or route selection, to the extent feasible.</p> <p>KGM projects are planned and designed in line with established design criteria and technical specifications, which prioritize the minimisation of land use and expropriation to reduce expropriation costs and displacement impacts of the projects on people.</p>	<p>During the route selection process, KGM has avoided and minimised land acquisition and expropriation to the extent feasible, in order to reduce the socio-economic impacts of the Project and to minimise expropriation costs.</p> <p>Once appointed, the SPV implemented route modifications to optimise the design and minimise the Project's environmental and social risks, including land acquisition-related impacts. During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the mechanisms outlined in Section 2.8.</p> <p>Also, affected people will have the right to submit requests to KGM seeking the avoidance or minimisation of impacts on their assets (such as requesting acquisition of orphan lands, avoidance of their structures). These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.</p>
Avoidance of Forced Eviction	Forced evictions ²⁸ will not be carried out except in accordance with law and the requirements of the performance standards.	<p>The Expropriation Law – Article 20 defines the procedure for the “Evacuation of the Immovable Asset”.</p> <p>Evacuation of the immovable property registered in the name of the expropriating authority under this Law is requested by the authority from the enforcement officer. The enforcement officer notifies the occupants to vacate the property within fifteen days. If the immovable property is not vacated within this period, it will be vacated by enforcement. Objection or complaint does not suspend the evacuation, and the court cannot issue a preliminary injunction.</p>	<p>In expropriations carried out under Article 8 or Article 10 processes, eviction is carried out in accordance with Article 20 of the Expropriation Law after the immovable property is registered in the name of the expropriating authority.</p> <p>The advance notice period is limited to the timeframe specified under Article 20 of the Law.</p> <p>In expropriations carried out under Article 27 process, the immovable property is also evicted pursuant to Article 20 following the court's Land Seizure Decision.</p>	<p>The Project will avoid forced eviction. The principles guiding this commitment are outlined in <i>Section 6.4</i> – under “Avoidance of Forced Eviction and Procedure for Lawful Evictions”.</p> <p>Evacuation of expropriated buildings and assets will be carried out in accordance with the Expropriation Law and the requirements of international lenders. To prevent forced eviction and allow adequate time for resettlement planning and preparation, the SPV will notify the owners and users (formal and informal) of affected structures six months prior to land entry – taking into account KGM's expropriation schedule.</p> <p>If eviction becomes unavoidable, the KGM and the SPV will comply with the requirements of national legislation and the provisions of relevant international standards (such as IFC PS5). Eviction will be carried</p>

²⁸ The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
				<p>out in a manner consistent with the fundamental principles of due process, including: provision of adequate advance notice; meaningful opportunities to submit grievances and appeals; avoidance of unnecessary, disproportionate, or excessive use of force; prevention of homelessness; and ensuring that adequate compensation is provided prior to the eviction.</p> <p>The SPV will notify the Lenders prior to carrying out any eviction. This notification will include a confirmation that all applicable conditions, as outlined above, have been and are being fulfilled.</p>
Negotiated Settlements	To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, clients are encouraged to use negotiated settlements meeting the requirements of the performance standards, even if they have the legal means to acquire land without the seller's consent.	The Expropriation Law – Article 8 (“Purchase Method”) stipulates prioritisation of the negotiated purchase method.	There is no gap as per the Law. The purchase method based on negotiation is prioritised by Law. In practice, KGM opts for negotiated settlements with the owners/shareholders to avoid court procedures (in line with the Expropriation Law) that may decelerate the progress of Project implementation and lead to additional costs associated with legal proceedings.	In this Project, KGM has prioritised negotiated settlements through the Article 8 process under the Expropriation Law (purchase method).
Failure of Negotiation – legal proceedings	In cases where affected persons reject compensation offers that meet the requirements of the performance standards and, as a result, expropriation or other legal procedures are initiated, the client will explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring.	<p>The Expropriation Law – Article 10 (“Determination of Expropriation Value and Registration of Immovable Property in the Name of the Administration by the Court”) stipulates that if expropriation cannot be carried out through purchase, the administration shall apply to the civil court of first instance in the jurisdiction where the immovable property is located, and request a ruling for (i) the determination of the expropriation value of the immovable property, and (ii) its registration in the name of the administration.</p> <p>If an Accelerated Expropriation Decision is issued for the projects, they may proceed under Article 27. The Expropriation Law – Article 27 (“Accelerated Expropriation”) stipulates that a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the procedures other</p>	In cases where negotiations fail, the expropriation value is determined by the court. The court processes Article 10 can involve lengthy procedures. Information and engagement with affected people may be inadequate, and issues or difficulties related to the deposition and withdrawal of compensation by affected people may pose disadvantages for the affected people.	<p>KGM will initiate court proceedings only if negotiations under Article 8 fail.</p> <p>KGM and the SPV will take various measures to ensure that court proceedings do not negatively impact the affected people. These measures – including the timely provision of information to affected people at all stages of the legal process and providing assistance to affected people to conclude inheritance and succession procedures – are aimed at mitigating potential adverse impacts.</p> <p>A detailed description of these actions is provided in Section 14.5 under “Coordination between KGM and SPV in case of Court Proceedings”.</p>

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		<p>than valuation shall be completed afterwards. The Project has in place Accelerated Expropriation Decision (Presidential Decree Date: 12 April 2023, No. 7060).</p>		
Consideration of Vulnerable Groups	<p>Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, and as part of the process of identifying risks and impacts, the client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status²⁹. Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.</p> <p>Particular attention will be paid to the needs of the poor and the vulnerable</p>	<p>According to the Constitution of the Republic of Türkiye, measures to be taken for children, the elderly, disabled people, widows and orphans of martyrs as well as for the invalid and veterans shall not be considered as violation of the principle of equality; the State shall protect the widows and orphans of martyrs of war and duty, together with invalid and war veterans, and ensure that they enjoy a decent standard of living; the State shall take measures to protect the disabled and secure their integration into community life; the aged shall be protected by the State; state assistance to, and other rights and benefits of the aged shall be regulated by law; to achieve these aims the State shall establish the necessary organizations or facilities, or arrange for their establishment.”</p> <p>The Expropriation Law of Türkiye does not include specific provisions.</p>	<p>As there are no specific legal provisions, individuals and groups who may be directly and disproportionately affected by project-related land acquisition due to their disadvantaged or vulnerable status are not specifically identified as part of the land acquisition process, and differentiated measures are not specifically or systematically developed.</p>	<p>The SPV has prepared this RFP and will subsequently prepare a RAP in accordance with international standards, identifying vulnerability categories and vulnerable people affected by land acquisition activities within the RAP survey sample.</p> <p>The RAP will define specific entitlements and support mechanisms tailored to the needs of vulnerable PAPs. Targeted consultations will be carried out in accordance with the principles of this RPF as part of RAP preparation to ensure the concerns of vulnerable groups were adequately addressed.</p> <p>A RAP Disclosure and Engagement Action Plan for disclosure and implementation phases will be developed as part of the RAP. This will include specific consultation approaches and communication tools designed to engage affected vulnerable people effectively (see <i>Section 10.4</i>).</p>
Consideration of Gender Aspects	<p>The consultation process should ensure that women’s perspectives are obtained and their interests factored into all aspects of resettlement planning and implementation. Addressing livelihood impacts may require intra-household analysis in cases where women’s and men’s livelihoods are affected differently. Women’s and men’s preferences in terms of compensation mechanisms, such as compensation in kind rather than in cash, should be explored.</p>	<p>According to the Constitution of the Republic of Türkiye, men and women have equal rights, including the right to own and inherit property. In practice, women in Türkiye do own and inherit land. The Expropriation Law does not contain specific provisions for women, as its implementation is intended to apply equally to all rightsholders, regardless of gender.</p> <p>Through Article 8, both female and male</p>	<p>As there are no specific legal provisions, the differential gender impacts of physical or economic displacement are not explicitly considered, and tailored measures are not specifically or systematically developed.</p>	<p>In accordance with the principles of this RPF, RAP surveys will ensure targeted surveys with women owners, shareholders and land users to enhance the representation of women in the socio-economic baseline.</p> <p>To ensure effective participation of women, the team will include a sufficient number of female surveyors. Clear communication strategies will be employed to encourage open and comfortable engagement with the female participants.</p>

²⁹ This disadvantaged or vulnerable status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	Documentation of ownership or occupancy and compensation arrangements should be issued in the names of both spouses or heads of households, and other resettlement assistance, such as skills training, access to credit, and job opportunities, should be equally available to women and adapted to their needs.	owners/shareholders are invited to and can participate in the negotiations and payments are made to each party in accordance with the outcomes of these negotiations.		A A RAP Disclosure and Engagement Action Plan for disclosure and implementation phases will be developed as part of the RAP. This will include particular consultation and information tools for women (see Section 10.4).
Census and Inventory of Assets	Where involuntary resettlement is unavoidable, either as a result of a negotiated settlement or expropriation, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	<p>The Expropriation Law – Article 7 (“Procedures to be Completed Prior to Expropriation”) defines the procedures required to be followed for the inventory of assets (land, crops, trees, structures), identification of the immovable assets and their legal owners/shareholders and possessors (“<i>zilyet</i>”).</p> <p>This data serves as the basis for the valuation study conducted by KGM, through its appointed engineering firms, in accordance with the Expropriation Law.</p> <p>The Expropriation Law of Türkiye recognises “<i>zilyet</i>” (possessor) rights where there is no title deed (in the absence of cadastral surveys).</p> <p>In the area where the Motorway route passes, the cadastral works along the expropriation corridor have been completed by General Directorate of Land Registry and Cadastre (TKGM) and there are no parcels without title deed registration; hence, no possessory (“<i>zilyet</i>”) rights exist in this Project.</p>	<p>The census and inventory of assets conducted in accordance with the Expropriation Law is limited with the legal owners/shareholders of the affected assets and the national Law does not require collection of data on informal users of lands.</p> <p>On the other hand, KGM has in place Technical Specifications for the Services to be Procured for the Valuation of Immovables (KGM, February 2019). This requires collection of data from the owners and/or users of the parcels. The data collected is integrated to the valuation of assets. However, this data is not used for further social and/or economic monitoring of the PAPs.</p> <p>The assets inventory in line with the Expropriation Law is being done for the full alignment covering all parcels affected by the Project within the expropriation corridor, structures built and/or used or agricultural practices done by formal and informal persons on affected parcels, including state-owned parcel (e.g. treasury parcels). On the other hand, expropriation plans include only the names of people with formal legal rights (asset owners).</p> <p>Article 19 of the Expropriation Law stipulates that “<i>For the expropriation of the land with a title deed belonging to others, unclaimed lands and/or lands that have not been acquired by the possessor, the minimum material cost of the buildings and the value of the trees as determined in accordance with Article 11 shall</i></p>	<p>The census and asset inventory were carried out by the engineering firms (valuation contractors) appointed by KGM, in accordance with the Expropriation Law and KGM's Technical Specifications. The asset inventory covers 100% of the project alignment and identifies the legal owners and shareholders of the affected assets. As of November 2025, the works have been completed for KM 0–35 and KM 70–105 and are ongoing for KM 35–70.</p> <p>For the identification of formal and informal users of the affected lands and assets, the SPV engaged a third-party implementation partner in October 2025 and user identification surveys will commence in November 2025 for the full alignment. This will also include interviews with settlement heads.</p> <p>Through the sample-based RAP field surveys to be conducted as part of subsequent RAP studies, categories of affected people – including owners, tenants, and formal/informal users – will be identified and the necessary socio-economic data for the development of the RAP will be collected. Informal and formal agricultural users of the affected parcels – including household members with vulnerabilities – who were not included in the expropriation plans approved by KGM, will also be identified as part of RAP field surveys.</p> <p>A database of affected owners and users (formal and informal) – PAP Database – including the names and contact details of the users, will be established based on the outcomes of RAP field surveys and maintained in the Project's database.</p>

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			<p><i>be paid to the possessor ("zilyet")</i>". Article 19 of the Expropriation Law stipulates valuation and compensation of owners of the informal building/structures and trees on state-owned lands (e.g. treasury parcels) based on the minimum prices. Noting that "zilyet" rights, which are recognised under Expropriation Law of Türkiye, are not applicable to the parcels affected by the Project as the cadastral surveys have been completed for all parcels affected by the project.</p>	<p>As part of the RAP implementation process, the sample-based surveys will be expanded to include all project-affected households. In parallel, the Project RAP Implementation Team will establish and maintain a comprehensive, up-to-date socio-economic database of all individuals affected by Project-related land acquisition. This database will capture information on households with both formal and informal land users, as well as on vulnerable individuals, consistent with the data collected during the RAP preparation phase as outlined in the earlier sections.</p>
Eligibility Classification	<p>Displaced persons may be classified as persons;</p> <p>(i) who have formal legal rights to the land or assets they occupy or use;</p> <p>(ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognizable under national law³⁰; or</p> <p>(iii) who have no recognisable legal right or claim to the land or assets they occupy or use.</p> <p>The census will establish the status of the displaced persons.</p>	<p>The Expropriation Law recognises the legal owners and shareholders of affected assets, as well as formal users of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – <i>ecrimisil</i>), as eligible for compensation.</p> <p>Regarding the compensation of informal users, the Expropriation Law – Article 19 ("Registration of immovable properties not recorded in the land registry and the rights of the possessor") stipulates that in the expropriation of properties that are registered under someone else's name, ownerless, and/or not acquired by the possessor, the minimum material cost of buildings and the value of trees as appraised under Article 11 are paid to the possessor. This does not include informal users of forest and pasture parcels.</p> <p>Please refer to "Census and Inventory of Assets" row, regarding the possessor ("zilyet") rights recognised under Expropriation Law.</p>	<p>The census and asset inventory by KGM identifies all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation.</p> <p>i) People who have formal legal rights to the land or assets they occupy or use are eligible for compensation under Expropriation Law.</p> <p>This includes formal users of state-owned lands, who may receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself.</p> <p>ii) People who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law, such as informal users of treasury who pay adequate pay ("<i>ecrimisil</i>") for their informal occupation, are compensated for their structures – based on minimum material cost ("asgari levazım bedeli") – and trees under Expropriation Law – Article 19. However, no compensation is provided for the land itself.</p> <p>iii) People who have no recognisable legal right or claim to the land or assets they occupy or use – such as informal users of forest and pasture lands are considered as illegal</p>	<p>The SPV has prepared this RPF and will subsequently prepare a RAP in line with international standards.</p> <p>This RPF sets out the key compensation and assistance principles in accordance with IFC PS5, and the RAP will include an Entitlements Matrix detailing the entitlements for all eligible categories defined under these standards, including owners, shareholders, and both formal and informal users of the affected lands and assets.</p>

³⁰ Such claims could be derived from adverse possession or from customary or traditional tenure arrangements.

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			occupants (“işgalci”) , are not entitled to any form of legal compensation for either the land or the assets.	
Cut-off Date	In the absence of host government procedures, the client will establish a cut-off date for eligibility . Information regarding the cut-off date will be well documented and disseminated throughout the project area.	The Expropriation Law – Article 25 defines the “Restriction of Rights and Transfer of Ownership to the Administration”. As per the Law, in large-scale public projects extending over future years, such as dams, irrigation networks and pipelines, highways, railways, ports, and airports, the public interest decision shall be announced by posting it for fifteen days in the neighbourhood and/or village headman’s office where the immovable properties to be expropriated are located. From the end date of the public interest announcement period, the value of fixed facilities built and trees planted on the immovable properties to be expropriated shall not be taken into account in the determination of the expropriation value. The restriction on the immovable properties shall be valid for five years from the end date of the announcement. The legal owners are officially notified during Article 8 process. In cases where the procedure under Article 27 is applied, the accelerated expropriation decision is published in the Official Gazette.	The practices and announcements done in line with Article 8, Article 25 and Article 27 of the Expropriation Law broadly covers the cut-off date requirements of the international standards. On the other hand, additional communication efforts may be required to ensure full compliance with IFC PS5 requirements on the disclosure of information related to the cut-off date. Even though the Law does not have explicit requirements regarding information of informal users on cut-off date, the formal users of the state-owned parcels (using the land with adequate pay – <i>ecrimisil</i>) are required by the Valuation Commission to provide the adequate pay (<i>ecrimisil</i>) documentation and compensated for the standing crops. Through this process, informal/formal users are also identified (personally or through mukhtars), and they are verbally informed about the upcoming expropriation and construction processes such that the lands used informally must not be cultivated further, the standing crops must be removed and the land must be evacuated. The period between the cut-off date and compensation of the affected land is essentially limited in BOT projects thus no relevant gap is foreseen in the Project.	The cut-off dates are determined based on the completion date of the census and asset inventory surveys conducted in each respective settlement and specific to each affected settlement. The cut-off date provisions will apply to both the owners and shareholders of the lands and assets, as well as to their formal and informal users. The cutoff will be specific to each affected settlement. The Project will broadly communicate the cut-off date in each affected settlement, to ensure that all affected persons, and any person seeking to settle in the area, are informed. Accordingly, following completion of inventory of assets by the valuation contractor and KGM’s approval of the expropriation plans, the SPV will post the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions. These will be posted in the offices of the mukhtars, local coffee houses, and other appropriate public venues (such as mosques and community gathering spaces used by local men and women) within the respective affected settlements.
Valuation, Compensation and Benefits for Displaced Persons	When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods, as provided in this Performance Standard. Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of	<u>Valuation Methodology:</u> Expropriation Law – Article 11 “Principles for Determining Expropriation Compensation” defines the principles and methodologies for valuation of lands, constructible plots (“ <i>arsa</i> ”), and buildings based on a set of defined criteria. The valuation methodology adopted by KGM is outlined in the <i>Technical Specifications for the Engineering Services to be</i>	<u>Valuation Methodology:</u> The expropriation values are determined in accordance with the well-established procedures set out in the Expropriation Law and are consistent with KGM’s Technical Specifications. <u>Delivery of Compensation:</u> Expropriation Law – Article 26 of the Expropriation Law recognises the land-for-land approach; however, the applicability of this option in Türkiye is very limited and not	The SPV has prepared this RFP and will subsequently prepare a RAP in accordance with international standards. The RAP will include an Entitlements Matrix, which provides for compensation at full replacement cost, along with additional assistance and support measures, for each category of affected people (owners and formal and informal users of affected lands, affected houses, and affected businesses, if any). The SPV will provide additional compensation to

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices	Gaps	Actions to Bridge the Gaps
	<p>displaced persons are land-based³¹, or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available³² and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation³³. The client will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project.</p>	<p><i>Procured for the Valuation of Immovables</i> (KGM, February 2019)</p> <p><u>Valuation of Agricultural lands:</u> The valuation is based on the capitalisation of annual net income, calculated with reference to market prices.</p> <p><u>Valuation of Structures:</u> The valuation is based on the Approximate Unit Structure Costs published annually by the Ministry of Environment, Urbanization and Climate Change. Depreciation rates are applied based on the age and condition of each structure.</p> <p><u>Valuation of Trees:</u> The valuation is based on KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": <i>"The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports"</i>.</p> <p>For trees in the preparation and maintenance period (i.e. before entering the productive stage), compensation is</p>	<p>feasible for this Project located in İstanbul and Tekirdağ.</p> <p>In case of Article 27, land seizure occurs only after an official invitation has been issued, and the determined compensation amount is deposited into the bank specified in the announcement. The amount deposited is immediately accessible to the rightful owners. Subsequently, the expropriation value of the asset is re-evaluated by the court under the Article 10 process. Any difference between the initial land seizure value and the final court-determined expropriation value is settled between the authority and the owners upon conclusion of the court proceedings.</p> <p><u>Full Replacement Cost:</u> The Law does not require compensation at full replacement cost, nor does it mandate the provision of additional assistance to restore or improve the living standards and livelihoods of affected people.</p> <p>Buildings and structures (residential, commercial or non-residential), are not compensated at full replacement cost, as depreciation is deducted based on the age and condition of each structure. In accordance with the depreciation ratios set out in the relevant Turkish legislation.</p> <p>Transaction costs – such as taxes, stamp duties, legal and registration fees, and relocation cost – are typically not separately included in the valuation. However, the valuation study for the Project is recent. The valuation of agricultural land has been carried out using a capitalisation approach based on</p>	<p>the affected people from the RAP Fund to supplement the amounts paid by KGM under Turkish Expropriation Law. This top-up payment will ensure that the total compensation received by PAPs reflects the full replacement cost, in line with international standards. In addition, the RAP Fund will finance the delivery of livelihood restoration, improvement, and assistance measures outlined in this RPF and subsequent RAP.</p> <p>Both (i) those who reach an agreement with KGM on the expropriation value in accordance with Article 8 of the Expropriation Law, and (ii) those who do not reach an agreement and whose assets are acquired through a court process under Article 27 of the same law, will be eligible for compensation and support under the RAP, through the RAP Fund established by the SPV. These entitlements will be provided in addition to the cash compensation paid by KGM in accordance with the Expropriation Law.</p> <p>The RAP Fund will be allocated and managed by the SPV, as detailed in Chapter 16.</p>

³¹ The term "land-based" includes livelihood activities such as subsistence cropping and grazing of livestock as well as the harvesting of natural resources.

³² In certain cases it may not be feasible to pay compensation to all those affected before taking possession of the land, for example when the ownership of the land in question is in dispute. Such circumstances shall be identified and agreed on a case-by-case basis, and compensation funds shall be made available for example through deposit into an escrow account before displacement takes place.

³³ Unless government-managed resettlement is involved and where the client has no direct influence over the timing of compensation payments. Such cases should be handled in accordance with the relevant paragraphs of the performance standards. Staggered compensation payments may be made where one-off cash payments would demonstrably undermine social and/or resettlement objectives, or where there are ongoing impacts to livelihood activities.

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		<p>determined using the capitalisation method. This includes costs associated with labour, machinery, and materials for cultivation, planting, irrigation, fertilization, pesticide application, and other relevant agricultural inputs, along with the rental value of the land.</p> <p><u>Valuation of Crops:</u> In the case of cultivated land, evacuation is postponed until after harvest. If waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court. If the crop value has already been taken into account in determining the expropriation value pursuant to Articles 11 and 12, it is not necessary to determine and pay this amount again for the evacuation of the immovable property.</p> <p><u>Delivery of Compensation:</u> Mandatory cash compensation, as stipulated by the Expropriation Law, is provided by the responsible authority in accordance with the procedures specified therein. According to Article 8 of the Expropriation Law ("Purchase Method"), the administration is required to prepare the amount specified in the Purchase Agreement Protocol ("<i>Satın Alma Tutanağı</i>") within forty-five days and request the property owner to transfer ownership rights to the administration on the date specified in the title deed. The expropriation fee is paid immediately upon the realisation of the rights transfer. Consequently, land entry occurs after the compensation has been deposited into the owners' account.</p> <p><u>Livelihood Restoration and Assistance:</u> The Expropriation Law of Türkiye does not include specific provisions.</p>	<p>annual net income, taking current market prices into account.</p> <p><u>Compensation of Formal Users:</u> formal users of state-owned lands receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself. Please refer to "Eligibility" row.</p> <p><u>Compensation of Informal Users:</u> informal users of treasury who pay adequate pay ("<i>ecrimisil</i>") for their informal occupation, are compensated for their structures – based on minimum material cost ("<i>asgari levazım bedeli</i>") – and trees under Expropriation Law – Article 19. However, no compensation or assistance (To find replacement land) is provided for the land lost.</p> <p>Informal users of forest and pasture lands are considered illegal occupants ("<i>işgalci</i>") and are not entitled to any form of legal compensation or assistance (to find replacement land) for either the land or the assets. Please refer to "Eligibility" row.</p> <p><u>Compensation for Crops:</u> There is no legal gap. In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is required by the SPV/EPC Contractor before the harvesting season concludes, KGM mandates that the SPV/EPC Contractor accessing the land provide compensation for the crops, in accordance with the Expropriation Law.</p> <p><u>Livelihood Restoration and Assistance:</u> The Expropriation Law does not provide for livelihood restoration, assistance, or transitional support for formal or informal owners/users, except in cases of government-led resettlement.</p>	

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
			Loss of pastures or restrictions on access to resources are not compensated, and no assistance measures are provided to the affected people.	
Community Engagement	The client will engage with Affected Communities, including host communities, through the process of stakeholder engagement described in relevant performance standards. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the relevant international standards.	<p>The Expropriation Law requires the disclosure of information and official notification to affected owners and shareholders in accordance with regulatory procedures.</p> <p>Expropriation Law – Article 8 ('Purchase Method') stipulates that owners must be notified by an official registered letter of the authority's intention to acquire, through negotiation, the immovable property, resource, or any easement rights thereon. Consultations are conducted as part of the negotiation meetings, which are held on the date determined by the commission, provided that the owner or their authorized representative is in attendance.</p> <p>The Article 27 Accelerated Expropriation Decision issued for the Project (Decision No. 7060, dated 12 April 2023) was disclosed to the public through publication in the Official Gazette on 13 April 2023. https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf</p>	<p>The information disclosure and official notification process, as defined by the Law, is limited to landowners and shareholders. There are no specific provisions or measures in place to address the needs of land users, vulnerable groups, or gender-related aspects in the design or implementation of information disclosure and consultation processes.</p>	<p>As part of the ESIA package, the SPV has developed and will implement a SEP in line with international standards.</p> <p>The RAP to be prepared following this RPF will include a detailed A RAP Disclosure and Engagement Action Plan for disclosure and implementation phases. This Plan will be implemented in alignment with the Project SEP.</p> <p>A Guide to Land Acquisition and Compensation (GLAC) will be prepared in both English and Turkish, following the approval of the RAP by the Lenders and LESA. The GLAC will provide a concise, clear, and non-technical summary of the RAP. Following its approval by the Lenders, the GLAC will be distributed to and presented to affected people.</p> <p>Please refer to Chapter 10 for specific provisions regarding engagement and information-sharing strategies, including tailored measures for vulnerable individuals.</p> <p>Please refer to Chapter 14 for information on the organisational capacity to be established for the Project and the roles responsible for community engagement and information disclosure.</p>
Grievance Mechanism	The client will establish a grievance mechanism consistent with relevant international standards as early as possible in the project development phase.	<p>The Expropriation Law grants affected owners the right to object to the expropriation value. According to Article 8, if no agreement is reached or the deed of transfer is not provided during the negotiation meetings, proceedings shall be initiated in accordance with Article 10 of the Law.</p> <p><u>Formal Correspondence:</u> KGM collects land acquisition-related grievances and feedback from affected</p>	The Expropriation Law and national legislation do not require the establishment of a project-specific grievance mechanism that meets the standards set by the international standards.	<p>The SPV has developed, and will implement, a SEP, including a Project-specific grievance mechanism, in line with international standards.</p> <p>Please refer to Chapter 11 for the details of the grievance mechanism.</p>

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		<p>persons through official letters and petitions, and responds to them via formal correspondence.</p> <p><u>KGM website:</u> KGM also provides a grievance form on its official website, which can be used by the public to submit concerns or feedback related to expropriation matters.</p> <p><u>Grievance and Feedback Form – KGM Website</u></p> <p><u>The Presidency's Communication Centre (CIMER):</u> CIMER provides a centralized complaint mechanism for the public.</p>		
Physical and Economic Displacement ³⁴	<p>In the case of physical displacement, the client will develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of the relevant international standards regardless of the number of people affected.</p> <p>In the case of projects involving economic displacement only, the client will develop a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of the relevant international standards.</p> <p>Where a project results in both physical and economic displacement, the relevant requirements should be incorporated into the Resettlement Action Plan or Framework (i.e., there is no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan).</p>	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a Resettlement Action Plan or Livelihood Restoration Plan, as mandated by relevant international standards.	<p>The SPV has prepared this RFP and will subsequently prepare a RAP in accordance with international standards, addressing both the physical and economic displacement impacts of the Project.</p> <p>The compensation and assistance to be provided by the SPV to physically and/or economically displaced households through the SPV's RAP Fund will be in addition to the expropriation compensation provided by KGM.</p>
Monitoring and Evaluation	The client will establish procedures to monitor and evaluate the implementation	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a	The SPV has prepared this RFP and will subsequently prepare a RAP in accordance with international

³⁴ Including the requirements under the Organisational Capacity and Commitment; Private-sector projects with government-managed land acquisition and resettlement; Physical Displacement and Economic Displacement and Livelihood).

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Appendix A for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	<p>of a Resettlement Action Plan or Livelihood Restoration Plan and take corrective action as necessary. The extent of monitoring activities will be commensurate with the project's risks and impacts. For projects with significant involuntary resettlement risks, the client will retain competent resettlement professionals to provide advice on compliance with the relevant international standards and to verify the client's monitoring information. Affected persons will be consulted during the monitoring process.</p>		<p>Resettlement Action Plan or Livelihood Restoration Plan, including monitoring and evaluation provisions, as mandated by relevant international standards.</p>	<p>standards, including the monitoring and evaluation provisions.</p> <p>Please refer to Chapter 13 for the details of the internal and external RAP monitoring mechanisms, as well as the resettlement completion audit.</p>
Resettlement Completion Audit	<p>Implementation of a Resettlement Action Plan or Livelihood Restoration Plan will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan as well as the objectives of the relevant international standards. The completion audit should be undertaken once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods. The completion audit will be undertaken by competent resettlement professionals once the agreed monitoring period is concluded.</p>	<p>The Expropriation Law of Türkiye does not include specific provisions.</p>	<p>The Expropriation Law and national legislation do not require a Resettlement Completion Audit in the context of project implementation.</p>	<p>The SPV has prepared this RFP and will subsequently prepare a RAP in accordance with international standards.</p> <p>As per this RPF and RAP, a resettlement completion audit will be conducted by qualified professionals once all mitigation measures have been substantially implemented, and the agreed RAP monitoring period has concluded.</p>

5. Baseline Studies

The socio-economic baseline conditions of the affected settlements and households will be presented in the RAP based on the analysis of data from the expropriation plans and data to be collected through RAP surveys. The data will be presented under the following main headings:

- Geographical Overview
- Administrative Organisation
- Affected Settlements
- Physically Displaced Households
- Economically Displaced Households

The baseline field surveys will be conducted in phases, as summarised in Table 5-1. A combination of qualitative and quantitative methods will be employed, utilizing both primary and secondary data.

The methods to be used by field social teams will include the following:

- **Key-informant interviews** with settlement heads (mukhtars) in all settlements affected by Project's land acquisition
- Household-level **livelihoods questionnaires** with **physically displaced households** (including households with vulnerable members and/or headed by women)
- Household-level **livelihoods questionnaires** with **economically displaced households** (including households with vulnerable members, vulnerable farmers, women farmers among others)
- **Business interviews** with **physically displaced businesses (if any)**, as well as businesses that are not physically displaced but may experience partial loss of land and assets.

Table 5-1. Baseline Survey Components

Phase	Scope	Planned Date of Field Surveys
Phase 1 – Key informant interviews and user identification surveys	Key-informant interviews will be conducted with the heads of affected settlements (mukhtars) ³⁵ . Users (formal and informal) affected lands and structures will be identified for KM 0-35 and KM 70-105 through interviews with mukhtars.	November 2025 (commenced)
Phase 2 – Resettlement Scoping Field Survey	Rapid interviews with sample physically displacement households (incl. households with vulnerable individuals) Rapid interviews with sample economically displacement households (formal and informal users of affected lands)	December 2025 (following the completion of RPF)
Phase 3 – RAP Surveys for KM 0 – 35 and KM 70 – 105	Household-level physical displacement questionnaires (with the owners and/or users of affected houses and structures) Household-level livelihoods questionnaires (with the owners and/or users of affected lands – including vulnerable individuals, women, and other local people whose livelihoods are affected by the Project) Business interviews, if affected businesses are identified (with the owners and/or users of affected business structures, if any)	Q1 2026
Phase 4 – RAP Surveys for Household-level questionnaires for KM 35 – 70	Same scope with Phase 1 and Phase 3.	Once the expropriation plans for this section become available

³⁵ Settlements (neighbourhoods) with highest impact in terms of number and area of affected land and structures will be prioritised.

The methodology of the RAP baseline surveys will be based on the following main principles:

- Key-informant interviews in settlements with the highest impact – based on the number and area of affected lands and structures (houses, businesses)
- **Full census of affected residential and business (if any) structures**
- **User (formal and informal) identification surveys will cover the full alignment**, in phases
- **Random sampling** for affected private and public lands and household-level livelihood interviews with their formal and informal users (sample size will be calculated for 95% confidence level and 5% margin of error)

Details of the methodology to be used will be provided in the Resettlement Scoping Report, and its implementation will be presented in the subsequent RAP.

6. Valuation and Compensation Methodology

6.1. Key Compensation and Assistance Principles

The land acquisition process for the Project is being carried out by KGM in accordance with the principles and procedures defined under the Expropriation Law (Law No. 2942, 1983) and other applicable legislation.

The status of land acquisition is presented in Section 2.7.

Key gaps between national legislation and international standards – particularly in areas such as depreciation for structures, resettlement planning, compensation for displacement impacts, livelihood restoration and assistance, stakeholder engagement, grievance management, and the consideration of vulnerable groups and gender aspects – are outlined in Section 4.3.4.

The key compensation and assistance principles to be adopted and implemented under the Project to ensure that land acquisition processes comply with international standards and the Lenders' requirements – specifically IFC PS5 – are summarised below.

- [Avoidance and Minimisation of Displacement:](#)

KGM has made efforts to avoid and minimise land acquisition and expropriation to the extent feasible during the route selection process, in order to reduce the Project's socio-economic impacts and minimise expropriation-related costs.

During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the following mechanisms, as outlined in Section 2.8.

- [Avoidance of Forced Eviction](#)³⁶:

The Project will not carry out forced evictions except in accordance with national legislation and the requirements of IFC PS5.

Evacuation of expropriated lands and assets will be requested by the SPV and carried out by the KGM in compliance with **Article 20 of the Expropriation Law**, following the completion of the expropriation process.

The principles and the procedure to be followed for avoiding forced eviction and managing the eviction process in compliance with IFC PS5 and requirements of Lenders are outlined in Section 6.4.

- [Prioritisation of Purchase through Negotiated Settlement over Expropriation:](#)

Although Accelerated Expropriation Decisions have been issued by the President of Türkiye in accordance with the Expropriation Law, KGM has prioritised negotiated settlements through Article 8 (purchase method) under this Project. As part of this process, owners and shareholders, including rightful heirs, are formally notified by KGM and invited to in-person negotiations based on valuations conducted in line with the Expropriation Law.

To inform owners, shareholders, and heirs about the land acquisition process, their legal rights under the Expropriation Law, and the actions required before negotiation meetings – such as completing inheritance and succession procedures³⁷ – the SPV will distribute printed copies of KGM's informational booklet on the procedural steps of expropriation in all affected settlements ([Appendix B](#)) in parallel to RAP preparation.

The distribution will continue in line with the Project's expropriation and construction schedules. This initiative aims to help prepare affected persons for the upcoming negotiation meetings and to increase participation, consent and title deed transaction rates to the extent possible.

³⁶ According to IFC PS5, forced eviction is "the permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection".

³⁷ Official notifications (invitations to negotiation meetings) sent to owners and shareholders by KGM, in accordance with Article 8 of the Expropriation Law, explicitly require that inheritance and succession procedures be completed and that inheritance certificates ("veraset/mirasçılık belgesi") be obtained prior to attending the negotiation meetings.

- [Proceeding with Article 27 Court Procedures only after Effective Consultations and Support Measures have been Undertaken:](#)

KGM will proceed with expropriation through Article 27 under the following conditions:

- Owners and shareholder have been consulted and informed of their rights under the Expropriation Law.
- Landowners have been formally invited to engage in negotiated settlements under Article 8 of the Law, but no agreement was reached.
- If there is an urgent need for land entry, **Article 27** will apply – but only after all shareholders and heirs of deceased owners have been identified and invited to participate in negotiation meetings.
- Following an Article 27 court decision, the SPV will confirm to the extent possible that shareholders have access to their compensation **prior to land entry**.

To ensure shareholders can access to the compensation after Article 27 court decision before land access right is used by the SPV, the SPV will assist the heirs of affected parcels in obtaining their inheritance certificates from the nearest, as needed. Where necessary, the SPV will also provide logistical support, including travel assistance, and cover associated notary and transportation fees through the RAP Fund.

- [Compensation at Full Replacement Cost:](#)

All compensation to people affected by land acquisition will be provided at **full replacement cost**³⁸. This includes market value plus any applicable transaction costs³⁹, as required by Lenders.

As the Project progresses, **KGM will update the valuation rates for land and assets at least on an annual basis**, as needed depending on the expropriation schedule, to ensure that the expropriation prices offered to eligible individuals reflect current market values.

To achieve full replacement cost for these structures, the **SPV will establish and manage a RAP Fund**, from which it will provide the following compensation:

- **Depreciation:** In accordance with the Expropriation Law, **depreciation is deducted** for buildings and structures (e.g., houses, barns, sheds, among other structures) based on the official ratios published in the relevant Turkish legislation. The amount corresponding to the deducted depreciation will be paid to eligible individuals by the SPV through the RAP Fund as additional top-up payments.
- **Compensation for Informal Users on state-owned lands other than forest and pasture lands:** Those occupying land without legal title – who own structures on titled or ownerless land – are eligible for compensation under **Article 19** of the Expropriation Law. KGM provides compensation based on **minimum material cost** (“*asgari levazim bedeli*”) to individuals who can demonstrate ownership of structures, even in cases where the underlying land is not titled or the claimant does not hold legal ownership of the land.

The difference between the minimum material cost and full replacement cost for the affected structures will be provided to eligible people by the SPV as additional top-up payments from the RAP Fund. No compensation will be provided for the land itself.

- **Compensation for Informal Users on forest and pasture lands:** Informal users of forest and pasture lands are considered as illegal occupants (“*isgalci*”) and are not entitled to any form of legal compensation for either the land or the assets under national legislation.
- The structures, trees and crops of these illegal occupants will be compensated by the SPV at full replacement cost. No compensation will be provided for the land itself.

³⁸ According to IFC PS5, “Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value”.

³⁹ Such as registration, taxes, time lost, cost of transport.

- [Crop payments:](#)

According to the Expropriation Law, in the case of cultivated land, evacuation is postponed until after harvest; if waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court.

In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is required by the SPV/EPC Contractor before the harvesting season, the SPV/EPC Contractor accessing the land will provide compensation for the crops from the RAP Fund, in accordance with the Expropriation Law.

- [Early Consultations and Notification for Land Acquisition Process:](#)

- [Affected houses and businesses \(if any\)](#): The SPV will notify the owners and tenants of affected structures at least **six months** in advance of the land entry (which corresponds to approximately three months before start of expropriation in case of Article 8 and Article 27 processes), in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time for resettlement planning, including the relocation arrangements of affected businesses.

In cases where expropriation has already been **concluded**, the SPV will inform property owners of the Project schedule, and each owner will be granted a **six-month** notice period (prior to land entry) to vacate the property following notification. In cases where this timeframe cannot be provided, alternative case-specific support mechanisms will be agreed with the affected people and implemented accordingly.

- [Affected lands](#): The SPV will notify **users of affected lands** at least **three months** before land entry. Land entry will only proceed after the completion of the expropriation process – including payment – or upon finalisation of mutual agreements with landowners and users.

Wherever possible, the SPV will seek to extend the notification period and make early notifications six months prior to land entry. If this cannot be achieved, any losses experienced by landowners or by formal or informal land users will be compensated by the SPV.

- [Land Entry after Completion of Expropriation](#)

To prevent unauthorized land entry prior to the completion of expropriation or the formal execution of consent protocols with affected owners, the SPV will implement a **Land Access Monitoring System**. Under this system, the SPV – RAP Implementation Team will develop and implement a parcel-based **Land Access Tracking Register, which will be a live document**, accessible to both the SPV and EPC teams.

The following actions will be implemented by the Project to ensure compliance with Lender's requirements:

- The completion status of expropriation, including compensation payments, shall be verified by the SPV's Resettlement [Specialist](#) and EPC's Health, Safety and Environment (HSE) Manager prior to the issuance of any work permits for construction activities, including topsoil stripping, excavation, and embankment (fill) works. The status will be registered in the Land Access Tracking Register.
- No construction activity shall commence on a parcel unless the expropriation process or a consent protocol (mutual agreement) has been completed and all required payments, including crop compensation for formal and informal users, have been made, and documented through the Land Access Tracking Register.

- [Livelihood Restoration and Assistance in addition to cash compensation:](#)

The SPV will provide livelihood restoration and assistance measures to eligible affected people, including owners and users of affected houses, businesses (if any), and lands, as well as their formal and informal users, in accordance with the requirements of the Lenders.

Livelihood restoration and assistance package options will be developed as part of the RAP, taking into consideration the outcomes of the RAP field surveys to be conducted with the affected people.

- [Disclosure and Consultation:](#)

This RPF and the subsequent RAP will be publicly disclosed through methods appropriate to the local context.

A non-technical summary of entitlements and procedures will be provided to all people affected by Project-related land acquisition in the form of a **GLAC**.

The SPV has started engaging with the affected people regarding the expropriation process, and this engagement will continue through a combination of community meetings and face-to-face consultations.

- [Grievance Management:](#)

The Project will establish and implement a fair, transparent, and efficient grievance management mechanism to address any compensation-related or other grievances raised by affected people, as described in Chapter 11.

- [Consideration of Vulnerable Groups:](#)

The SPV will pay specific attention to vulnerable individuals, who will be identified and supported through tailored measures in accordance with the measures outlined in the RAP – Entitlements Matrix, and Chapter 12.

- [Monitoring and Reporting:](#)

The Project will establish a monitoring system to track and report on the performance of resettlement and compensation measures. This system will engage affected people and assess their satisfaction with the process, as detailed in Chapter 13.

- [Provisions for Future Land Acquisition/Expropriation during operations phase:](#)

The same principles outlined in this RPF and the subsequent RAP will apply to any future land acquisition or expropriation activities required for the Project. In the event that additional land acquisition or expropriation becomes necessary⁴⁰, RAP addendum documents will be prepared and implemented by the SPV in collaboration with KGM, as outlined in Section 3.6.5.

These RAP addenda will adhere to the same principles, procedures, and standards established in this RPF and subsequent RAP to address the specific displacement impacts associated with the new land requirements.

⁴⁰ This includes potential physical displacement requirements of houses located outside the expropriation corridor, which may experience residual impacts during the operation phase, such as noise and risks to community health and safety, that may be significant and may necessitate the physical displacement of certain houses situated outside, but in close proximity to, the expropriation corridor (please see Section 3.6.5 for further details).

6.2. Census and Inventory of Assets

The census and asset inventory for KGM motorway projects is conducted along the entire alignment, as mandated by Türkiye's Expropriation Law and in accordance with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables (February 2019). This process identifies all land parcels – whether privately owned, legally registered to entities, or state-owned – within the motorway expropriation corridors, along with all affected structures and trees on those parcels.

The census and asset inventory works for the Kınalı – Malkara Motorway Project commenced in **April 2024** and have been undertaken by a national engineering firm (**valuation contractor**) appointed by the SPV, with approval from KGM.

The status of completion for the asset inventory, structure identification reports, and valuation reports will be detailed in the RAP.

- [Owners and Shareholders](#)

In accordance with the procedures established under the Expropriation Law of Türkiye, as part of the census and inventory of assets, the legal owners and shareholders of affected land, structures, trees and where applicable are identified and included in the expropriation lists.

In the case of structures on private or public parcels, structure valuation forms are prepared for each affected structure (e.g. houses, non-residential assets), and all trees are inventoried and incorporated into the expropriation plans. However, the **owners** of these structures and trees on public land (formal or informal land users) are **not** systematically recorded.

Owners and shareholders of affected assets are informed of the results of the census, inventory of assets and valuation during in-person negotiation meetings. These meetings are formally documented through signed agreement protocols or waiver ("*imtina*") records. In case of agreement, protocol is signed by both the negotiation commission and the relevant owner or shareholder.

To ensure the accuracy and completeness of the asset inventory carried out by the appointed valuation contractor based on field studies, the KGM institutes a multi-tiered control mechanism. As part of this, site verifications and spot checks are carried out independently by both Regional Directorates and representatives from the General Directorate. These inspections serve to validate the inventory prepared by the national engineering firm (valuation contractor).

KGM also implements a grievance mechanism to address potential errors or omissions in the inventory of assets. Through this mechanism, affected people are able to raise grievances or objections during the negotiation meetings or submit them separately to the KGM's Regional Directorate through petitions. Upon receipt of such grievances, KGM conducts a re-examination of the concerned assets, assesses the validity of the claims, and amends the inventory where necessary.

During the negotiation meetings held in accordance with Article 8 of the Expropriation Law, the following information is shared with each owner or shareholder:

- Land registry details of the asset subject to expropriation, including the expropriated area, unit land price, and valuation criteria (e.g., debris value for trees or structures, if applicable; and any increase or decrease in the residual parcel's value)
- Detailed inventory of crops, trees, structures, wells, walls, and other improvements, along with their respective quantities and assessed values
- Ownership information pertaining to the relevant owner or shareholder
- Total compensation amount proposed for payment to the owner or shareholder

Informal Users

Under the national legal framework, the expropriation process does not mandate the census of informal users or individuals without legally recognisable rights or claims to the land or assets they occupy or use. **Nevertheless, all fixed assets on private and public lands – regardless of ownership status – are identified and documented by KGM in the expropriation plans and structure valuation forms prepared as part of the asset inventory process.** However, no compensation for land is provided by KGM to land users under the Expropriation Law. Informal users – **excluding those occupying forest and pasture lands** – are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at minimum material cost (**not at replacement cost**), in accordance with Article 19 of the Expropriation Law, **provided they can demonstrate ownership of these assets. Informal users of forest and pasture lands** are considered as **illegal occupants (“işgalci”)** and considered not entitled to any form of legal compensation for either the land or the assets. As outlined in Section 7.3 – Entitlements Matrix, (i) if KGM pays only for minimum material cost as per Article 19 of the Expropriation Law (based on evidence of ownership), **top-up cash compensation to reflect market value and achieve full replacement cost** of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the asset owner by the SPV from the RAP Fund (only for structures/buildings), and (ii) if KGM does not provide any compensation (e.g. for structures on forest or pasture), cash compensation **at full replacement value** will be provided by the SPV from the RAP Fund to the asset owner (based on evidence).

These fixed assets may include residential, non-residential, and commercial structures, as well as trees and where available crops located on both private and public parcels. The data collected through this process form the basis for valuation activities conducted in accordance with the Expropriation Law of Türkiye.

In October 2025, the SPV engaged an implementation partner, to conduct a **user identification study** to identify formal and informal users of private and public lands within the Motorway project’s expropriation corridor, initially for KM 0 – 35 and KM 70 – 105. This study is scheduled to be initiated in **November 2025**. The studies for KM 35 – 70 will be scheduled once the expropriation plans for this section become available.

In accordance with the provisions of this RPF and the RAP, the SPV will inform both formal and informal users of the compensation they are entitled to – whether under national legislation (where applicable) or under the RAP – during the RAP implementation phase.

6.3. Valuation

In the Turkish legal system, there is a comprehensive legal framework regulating the acquisition of land and immovable properties and the payment of expropriation compensation under national legislation, including general provisions and laws such as the Constitution, the Expropriation Law (Law No. 2942, as amended by Law No. 4650), the Land Registry Law (Law No. 2644), the Pasture Law (Law No. 4342), the Forest Law (Law No. 6831), the Settlement Law (Law No. 2510), and the Law on the Prevention of Trespassing on Possessed Immovable Property (Law No. 3091).

According to the current Expropriation Law in Türkiye, compensation is paid within the framework of the principles specified in the Law to individuals who prove ownership or possession (titleholders or possessors) of private lands that are expropriated for public benefit, and to the relevant public institution in the case of public lands. No compensation can be granted to users or individuals benefiting from the land in other ways who are not among those specified above. Individuals who use public property without authorisation are not entitled to any portion of the expropriation compensation paid for such properties; however, compensation for any loss of income they may suffer due to the use of these lands are not considered.

Based on the census and asset inventory, the initial valuation of assets is carried out by the appointed engineering firm (valuation contractor) in accordance with the Expropriation Law and KGM’s **Technical Specifications for the Services to be Procured for the Valuation of Immovables** (February 2019). As required by Law and the Technical Specifications, the valuation study considers various factors such as current market prices, landmark court rulings, precedent sales data, and the current building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.

There are some gaps between the Turkish legal framework governing land acquisition and the standards of IFIs, as outlined in Section 4.3.4. Under Turkish legislation, payment of expropriation compensation requires the person to formally prove ownership or possession of the land and/or structures. In contrast, IFI standards stipulate that individuals who use and generate income from the land – whether formally or informally – must be compensated regardless of whether they have legal title or not. According to IFI standards, the direct income individuals derive from the land must be taken into account, and adverse impacts on their livelihoods must be compensated.

6.3.1. Key Valuation Provisions of the Expropriation Law

The key provisions of the Expropriation Law, particularly those related to asset valuation and compensation, are presented in [Appendix A](#).

The valuation procedures and methods under the Law are primarily outlined in Articles 8, 11, and 12, as summarised below.

- [Article 8](#) of the Expropriation Law sets out the principles governing the negotiated purchase method. It specifies the data sources to be used during the valuation process and provides procedural guidance. Under this Article, the expropriating authority is required to establish an internal valuation commission composed of at least three members. This commission is responsible for determining the compensation amount and conducting negotiations with the property owner to reach an agreement –either for purchase or exchange of the affected asset. The primary aim of this administrative process is to complete the expropriation through mutual agreement, thereby avoiding legal proceedings.
- Article 10 outlines the determination of the expropriation price by the court and registration of the immovable property in the name of the administration. If the expropriation cannot be carried out through the Article 8 purchase procedure, the administration applies to the civil court of first instance where the immovable property is located, attaching the information and documents collected under Article 7 of the Law, as well as the valuation it has had conducted under Article 8 and other related information and documents, and requests a decision for the determination of the expropriation price and for the registration of the immovable property in the name of the administration. If the parties fail to reach an agreement on the price during the hearing held by the court, the judge, within ten days at the latest, schedules an on-site inspection and set a hearing date for thirty days thereafter. The on-site inspection is conducted by the **experts** specified in **Article 15**⁴¹ and in the presence of all relevant parties to determine the value of the immovable property. For the purpose of ensuring the presence of the headman of the village or neighbourhood to which the immovable property belongs, a notice of invitation is also sent to the mukhtar, and the mukhtar's statement is taken during the inspection. The experts, taking into account the statements of the parties and other relevant persons, submit their report indicating the value of the immovable property, in accordance with the principles set out in Article 11.
- [Article 11](#) outlines the criteria for valuing land, parcels, and structures. While the Law lists the factors to be considered in the valuation process, it does not elaborate on how these criteria should be applied in practice. In effect, the interpretation and implementation of these valuation principles have largely been shaped by judicial precedents and case law rather than detailed legal provisions.
- [Article 12](#) grants the administration the authority to expropriate either an entire immovable property or a part thereof, in conjunction with Article 46 of the Constitution as well. This is known as partial expropriation. This Article regulates how the impact on the remaining (unacquired) portion of the property should be considered in the valuation. If partial expropriation results in a decrease in the value of the remaining part – or renders it unusable – this loss must be taken into account in the compensation process.

⁴¹ Article 15 of the Expropriation Law outlines the rules for appointment of experts by the courts. Accordingly, the experts appointed by the courts under the Expropriation Law shall be selected from the lists prepared by the regional expert boards, and the provisions of the Expert Law and the relevant articles of the Code of Civil Procedure No. 6100 of 12/1/2011 shall apply to them. Depending on the type and characteristics of the immovable property subject to expropriation, it is mandatory to form an expert committee of at least three persons. One of the experts must be selected from among specialists who hold a master's or doctoral degree in real estate development, or from real estate valuation experts authorised under the Capital Markets Law No. 6362 of 6/12/2012. The fields of expertise of the experts shall be determined by taking into consideration the characteristics of the immovable property to be expropriated. The expert committee shall determine and assess the value of the immovable property in accordance with the provisions contained in Articles 11 and 12.

6.3.2. Valuation Methodology of KGM

KGM has adopted a formal guidance document titled “**Technical Specifications for Valuation Services**”, issued in **February 2019**, which governs the scope and methodology of services procured for the valuation of immovables. These specifications outline the procedures and principles that must be followed by contracted engineering firms when performing valuation and related technical services.

The responsibilities defined in the specifications include:

- **Valuation of lands and constructible plots**, whether or not they include structures, and whether they are subject to full or partial expropriation;
- **Valuation of buildings and permanent fixtures** located on the property;
- Determination and valuation related to the **constitution of easement rights (servitude)**;
- **Exchange of immovable properties**, where applicable;
- Determination of **fees for temporary occupancy** of land;
- **Valuation of standing crops, trees, and other physical assets** present on the land;
- Classification and distinction of immovables within the expropriation zone as either **land or constructible plots**;
- Determination of **local average purchase-sale prices** for comparable parcels;
- Determination of the **capitalization rate** along the project route;
- Calculation of **diminution in value** for the **non-acquired portion** of a partially expropriated parcel.

These procedures form the basis for property valuation during land acquisition activities under KGM projects and are intended to ensure technical consistency, traceability, and fair compensation in line with national legislation.

Detailed procedures for valuation of lands, constructible plots and structures as per the Technical Specifications is provided in [Appendix A](#).

6.3.3. Future Valuation Updates

As part of Project’s expropriation process, Article 8 negotiations are conducted on the basis of up-to-date valuation studies, within a reasonable period of time after the valuation reports are prepared and approved by KGM. In future, valuation rates for land and assets will be updated by KGM **at least annually**, as needed.

The following factors are typically considered in these valuation updates:

- Since agricultural data changes every year, land prices (based on cost and income) are updated according to agricultural data announced by the directorates of agriculture in the early months of the year.
- As for plots (zoned land), since valuation is done using the comparable sales method, updates are made as market transaction values change. The general practice is to set the price at the beginning of the year and use the same prices until the end of the year.
- For buildings, updates are made based on the approximate construction unit costs published in the Official Gazette in the first months of each year (except for years with high inflation, when these unit costs have been published twice a year in the Official Gazette).
- The prices can be updated at any time by considering market conditions and inflation effects – subject to approval by Directorate General of KGM.

6.4. Avoidance of Forced Eviction and Procedure for Lawful Evictions

The term forced eviction is defined by IFC GN5 (2012) as “*The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.*”

The SPV is committed to complying with the IFC PS5 requirements on forced eviction and avoiding forced eviction throughout the land acquisition and expropriation process and complying with the relevant requirements of the international standards, through the measures to be taken in coordination with KGM. Accordingly, the SPV is fully committed to implementing the necessary measures to ensure that no homeowner – including those under co-ownership arrangements or informal land users with houses on forest, treasury, or other state-owned land – is left without a house. In this regard, the measures set out in this RPF and the subsequent RAP will be implemented, and where necessary, alternative methods will be developed in consultation with KGM, the affected people, and the Lenders during site implementation.

However, if eviction becomes unavoidable despite prior engagement and the enhanced information and consultation process, the SPV will prepare and submit to Lenders and LESA for review and comments an information note detailing all of the steps taken by SPV and KGM showing evidence that all avenues are exhausted leaving the only option as forced eviction. Following the information of and consultations with the Lenders and LESA, the SPV will submit a formal request to KGM to proceed with the eviction of expropriated properties and KGM Regional Directorate will execute the eviction of expropriated properties in accordance with Article 20 of the Expropriation Law.

The SPV will implement feasible measures before, during, and after the eviction process, as outlined in Table 6-1, but will avoid direct involvement in eviction process undertaken by KGM.

Table 6-1. Procedure to be followed by KGM for Lawful Eviction of Expropriated Properties and Measures to be taken by SPV when to Eviction by KGM is Unavoidable

No.	Steps to be followed by KGM in case of Lawful Eviction in accordance with Expropriation Law – Article 20	Measures to be taken by SPV
Prior to Eviction		
0	<ul style="list-style-type: none"> KGM will not carry out any additional engagement activities prior to eviction, other than the negotiations conducted under Article 8 of the Expropriation Law. 	<ul style="list-style-type: none"> The SPV will increase engagement with those involved before eviction is considered, providing genuine opportunities for dialogue with no pressure or coercion exerted, and document all engagement and attempts at reaching a reasonable agreement prior to eviction: <ul style="list-style-type: none"> GLAC: GLACs, providing a concise, clear, and non-technical summary of the RAP, will be distributed and presented to affected people during early consultations and notification for land acquisition⁴² process to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 27 – their rights under the Expropriation Law, as well as the RAP’s eligibility criteria and entitlements. Enhanced Information and Consultation: The SPV will implement enhanced communication strategies, as outlined in Chapter 10, to ensure affected persons understand; (i) the expropriation process and their legal rights, (ii) compensation mechanisms provided by KGM; and (iii) additional entitlements and support available through the RAP Fund managed by the SPV. As required by IFC’s Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) (specifically Box 6.5 on Lawful Evictions: Factors and Measures to Consider), the SPV will avoid changing the compensation entitlements established in the RAP and

⁴² In line with this RPF and key compensation and assistance principles presented in Section 6.1,

- Affected houses and businesses (if any): the owners and tenants of affected structures will be notified by the SPV at least **six months** in advance of the land entry (which corresponds to approximately three months before start of expropriation in case of Article 8 and Article 27 processes).
- Affected lands: users of affected lands will be notified by the SPV at least three months before land entry.

No.	Steps to be followed by KGM in case of Lawful Eviction in accordance with Expropriation Law – Article 20	Measures to be taken by SPV
		<p>negotiated with other affected persons – unless a correction or update is required for fairness – which would raise a risk of unfairness and increase the risk of conflict with others.</p> <ul style="list-style-type: none"> - The entitlements included in the RAP and presented to affected people through GLAC will be strictly followed. <ul style="list-style-type: none"> • The SPV will provide full information on legal avenues available to those affected, conveyed by an independent party, and mediation services and legal aid to those in need of it to seek redress, at no cost to those affected. <ul style="list-style-type: none"> - Project-specific Grievance Mechanism: The SPV will ensure that the affected persons have access to the Project-specific Grievance Mechanism, which includes an Appeal Mechanism, throughout the expropriation and RAP implementation periods. <ul style="list-style-type: none"> • Prior to eviction, the SPV will ensure adequate and reasonable notice to all affected persons: <ul style="list-style-type: none"> - Early Consultations and Notification for Land Acquisition Process: <p><u>Affected houses and businesses:</u> The SPV will notify the owners and tenants of affected structures at least six months before land entry, in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time for resettlement planning, including the relocation arrangements of affected businesses.</p> <p>In cases where expropriation has already been concluded, the SPV will inform property owners of the Project schedule, and each owner will be granted a six-month notice period to vacate the property following notification.</p> <p><u>Affected lands:</u> The SPV will notify users of affected lands at least three months before land entry. Land entry will only proceed after the completion of the expropriation process –including payment – or upon finalisation of consent protocols with landowners and users.</p> <ul style="list-style-type: none"> • The SPV will ensure that reasonable temporary accommodation is provided to those evicted should they not have an alternative place to stay. <ul style="list-style-type: none"> - During the early consultation and notification phase of the land acquisition process, the SPV will engage with affected individuals to identify any temporary accommodation needs and will make the necessary arrangements accordingly, if required.
1	<ul style="list-style-type: none"> • KGM Regional Directorate – Department of Immovables (administration) submits the eviction request to the Legal Department, along with the relevant expropriation documentation for the properties to be vacated. 	<ul style="list-style-type: none"> • If eviction becomes unavoidable despite prior engagement and the enhanced information and consultation process, the SPV will submit a formal request to KGM to proceed with the eviction of expropriated properties. This request will: <ul style="list-style-type: none"> - Include a reference to the requirements of IFC PS5 regarding lawful evictions
2	<ul style="list-style-type: none"> • KGM Regional Directorate – Legal Department informs the executive office (“İcra Müdürlüğü”) at the relevant Court of Justice (“Adliye”) about the properties to be vacated and formally requests their eviction, through the 	<ul style="list-style-type: none"> - Refer to the Project-specific Human Rights Policy, - Emphasize the need for KGM to coordinate with public security forces to ensure that no disproportionate force is used during the process - Request KGM to ensure that evictions are not to take place in bad weather or at night; specific care is taken of vulnerable people, particularly disabled or sick individuals, pregnant or lactating women,

No.	Steps to be followed by KGM in case of Lawful Eviction in accordance with Expropriation Law – Article 20	Measures to be taken by SPV
	National Judiciary Informatics System (UYAP).	young children, the elderly, and those that are at risk of gender-based violence
3	<ul style="list-style-type: none"> The executive office sends a registered letter with return receipt to the property owners, giving them a 15-day notice, in accordance with the Expropriation Law – Article 20. 	<ul style="list-style-type: none"> The SPV will inform the Lenders and the LESA in advance of the request for eviction process. Before SPV submits a formal request to KGM to proceed with the eviction of expropriated property, an information note detailing all of the steps taken by SPV and KGM showing evidence that all avenues are exhausted leaving the only option as forced eviction, will be prepared and submitted by the SPV to Lenders and LESA for review and comments.
4	<ul style="list-style-type: none"> According to the Law, written notification is sufficient. However, in small settlements, verbal notification can also be given by visiting the location. <p>In such cases, to identify the user of the property, a joint visit to the site is conducted either before or after the official notification. This visit is carried out by law enforcement officers, an enforcement officer, a KGM lawyer, and personnel capable of identifying the location of the property (e.g., a staff member from the Department of Immovables).</p> <p>During this visit, the user and any structures subject to eviction are identified, and an official record is prepared.</p>	
During Eviction		
5	<ul style="list-style-type: none"> After 15 days, the eviction procedure is initiated by the administration's lawyer, the relevant executive officer, and depending on the condition of the property, workers and law enforcement officers (if requested). They visit the property to check whether it has been vacated; if not, eviction is carried out. If eviction is carried out through enforcement, the enforcement costs are charged to the property owner. The belongings of the evicted households are moved to a trustee (custodian) appointed in advance. The costs of the trustee and laborers are charged to the property owner. 	<ul style="list-style-type: none"> The SPV will avoid direct involvement in implementing evictions and exercise caution and monitor the process to avoid reputational and operational risks. The SPV will coordinate with KGM to provide independent medical assistance, subject to approval by the relevant authorities. The SPV will cover the cost of trustee.
After Eviction		
6	<ul style="list-style-type: none"> KGM will not carry out any additional engagement activities or provide additional measures after the eviction. 	<ul style="list-style-type: none"> The SPV, with support from third-party implementation partners and consultants, will continue to monitor the conditions of individuals who have been evicted and will document their circumstances in periodic internal RAP monitoring reports submitted to the Lenders.

7. Eligibility and Entitlements

According to IFC’s Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), “**Eligibility** includes a definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cutoff dates” and “**Entitlement** describes all categories of affected persons and the options that they are being offered for all losses (including compensation, allowances, assistance and livelihood-restoration measures, resettlement housing). This is preferably provided in tabular form (entitlement matrix).”

7.1. Eligibility

The Expropriation Law of Türkiye recognises the **legal** owners and shareholders of affected assets, as well as **formal users** of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – “*ecrimisil*”), as eligible for compensation. The census and asset inventory by KGM identifies legal owners and shareholders, as well as all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation.

Regarding the compensation of **informal users**, the Expropriation Law – Article 19 (“Registration of immovable properties not recorded in the land registry and the rights of the possessor”) stipulates that in the expropriation of properties that are registered under someone else’s name, ownerless, and/or not acquired by the possessor, the minimum material cost of buildings and the value of trees as appraised under Article 11 are paid to the possessor. This does not include informal users of forest and pasture parcels.

- [Eligibility under RAP](#)

The eligibility categories of displaced people as defined by IFC PS5, and the eligibility of people falling into respective categories under Expropriation Law is summarized in Table 7-1.

All affected persons falling within these three categories will be eligible for compensation and/or assistance under this RPF and the subsequent RAP, tailored to their specific impact category.

Table 7-1. Eligibility Categories under IFC PS5 and Corresponding Provisions under Turkish Expropriation Law

Eligibility Categories according to IFC PS5	Eligibility of Corresponding People under Expropriation Law
(i) who have formal legal rights to the land or assets they occupy or use;	Affected people falling into this category are eligible for compensation under Expropriation Law. This includes formal users of state-owned lands (except for forests and pastures), who may receive compensation for any structures, trees, and standing crops, they have on the land – though not for the land itself.
(ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognizable under national law ⁴³	Affected people falling into this category, such as informal users of treasury who pay adequate pay (“ <i>ecrimisil</i> ”) for their informal occupation, are eligible for compensation for their affected structures – based on minimum material cost (“ <i>asgari levazım bedeli</i> ”) – and trees under Expropriation Law – Article 19. No compensation is provided for the land itself. The Expropriation Law of Türkiye recognises possessor (“ <i>zilyet</i> ”) rights where there is no title deed (in the absence of cadastral surveys). However, in the area where the Motorway route passes, the cadastral works along the expropriation corridor have been completed by TKGM and there are no parcels without title deed registration; hence, no possessory (“ <i>zilyet</i> ”) rights exist in this Project.
(iii) who have no recognisable legal right or claim to the land or assets they occupy or use.	Affected people falling into this category – such as informal users of forest and pasture lands are considered as illegal occupants (“ <i>işgalci</i> ”), are not entitled to any form of legal compensation for either the land or the assets.

⁴³ Such claims could be derived from adverse possession or from customary or traditional tenure arrangements.

The categories of eligible people under this PRF and the subsequent RAP is presented in Table 7-2.

In accordance with international standards, **individuals who encroach upon the Project area after the cut-off date will not be eligible** for compensation or assistance under this RPF and subsequent RAP.

The RAP will outline the approach for eligibility assessment and specify the documentation required to confirm the eligibility of affected persons, including those who have claims to the affected land and assets.

Table 7-2. Categories of Eligible People under RAP

Impact Category	Eligible People Categories
(i) Affected Lands	
Permanent loss of private parcels – agricultural parcels and constructible plots⁴⁴ (urban lands)	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Loss of litigious properties⁴⁵ (“ <i>ihtilaflı bulunan mülkiyet</i> ”)	Litigants claiming to be rightful owners/shareholders of litigious properties
	Users of litigious parcels
Orphan lands	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Permanent loss of state-owned treasury parcels (e.g. treasury, registered pasture lands, non-registered parcels) which are used for <u>agriculture</u> or other income generating activities)	Owners
	Formal users with official documentation
	Informal users with no official documentation
Permanent loss of forest land	Users of forest lands
Permanent loss of treasury – pasture lands	Users of affected parcels for grazing
Restriction of access to grazing lands – located out of Project expropriation corridor (public or private) due to land fragmentation or other Project-related factors	Users of grazing lands
Loss of crops	Owners of the crops (owner or formal/informal user of the land)
Loss of trees (fruit or non-fruit trees)	Owners of the trees (owner or formal/informal user of the land)

⁴⁴ Urban lands which are parcelled by the municipalities within the municipal boundaries are regarded as constructible plot (in Turkish “*arsa*”) as per the Real Estate Tax Law of Türkiye (Law No. 1319, Article 12). Designation of lands as constructible plot (urban land or *arsa*), which have not been parcelled inside or outside the municipal boundaries, is decided by Presidential Decree or other legal arrangements as applicable.

⁴⁵ According to Article 18 of the Expropriation Law (“Determining Whether the Immovable Property Is in Dispute”), “*the administration shall determine whether there is any dispute regarding the ownership of the immovable property decided to be expropriated by making inquiries with the land registry office, the cadastral directorate, and the civil courts located in the area where the immovable property is situated, and by conducting an on-site investigation. If the research indicates that the immovable property is registered in the land registry but is subject to an ownership dispute before a court, or that although the cadastral work has been completed, the property is the subject of a case before the cadastral court, the administration shall submit all documents prepared pursuant to Article 10 to the civil court of first instance where the immovable property is located and request a decision for the determination of the expropriation value of the immovable property and for its registration in the name of the administration in return for payment of this value in advance, or in installments if the expropriation has been conducted in accordance with the second paragraph of Article 3, to the rightful owner who will be determined based on the outcome of the ownership dispute. The court shall notify all parties to the ownership dispute concerning the immovable property, ensure that notifications and announcements are made in accordance with Article 10, determine the expropriation value of the immovable property again in accordance with the procedures of that article, and after this value is deposited by the administration into the bank designated by the court in a three-month term account pursuant to Article 10, to be paid to the rightful owner to be determined upon conclusion of the ownership dispute, the court shall order the payment of this amount to the rightful owner to be determined later and the registration of the immovable property in the name of the administration, and shall notify this decision to the land registry office and the bank where the money has been deposited. In expropriations carried out under the second paragraph of Article 3, the initial and subsequent installments of the expropriation value determined by the court shall also be deposited into the three-month term accounts in the bank designated by the court. Upon application of the person who is determined by the court to be the rightful owner as a result of the ownership dispute, the court that determined the expropriation value shall issue an instruction to the bank for payment of the money to this rightful owner, and the money shall be paid to that person*”. Please refer to RAP – Section 7.3 (“Entitlements Matrix”) for compensation and support to be provided by SPV to rightful owners determined by the courts through the Article 18 process, indicating that “*all entitlements defined for owners under (i)1 – Permanent loss of private parcels*” will also apply to litigants who claim to be the rightful private owners or shareholders, **provided that their eligibility for compensation under the Expropriation Law is validated by the courts through the Article 18 process. These entitlements, including any compensation and/or assistance, will be delivered by the SPV to the validated rightful owners/shareholders upon completion of the Article 10 process”.**

Impact Category	Eligible People Categories
Loss of assets or infrastructure on affected private or public parcels (non-residential secondary structures, fences, barns, sheds)	Owners of non-residential structures and infrastructure who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures and infrastructure who are informal users of lands (with no title deed/official documentation but can prove their ownership of the structure)
	Owners of non-residential structures and infrastructure who are informal users of lands with <u>no</u> official documentation proving their ownership of the structure or users of forestry and pasture lands
Constitution of servitude (easement leading to loss of value of the immovable)	Owners of the parcels to be acquired through constitution of servitude (easement rights)
(ii) Affected Houses	
Loss of formal residential houses on affected private parcels	Owner of affected house
	Formal user (formal tenant)
	Informal users
Loss of informal residential houses on affected public parcels	Owner and user of affected house
(iii) Affected Businesses	
Loss of business structures (fully or partially) on affected private parcels	Formal or informal business owners who are the “ owner ” of the affected business structure
	Formal or informal business owners who are the “ tenants ” at the affected business structure
	Not a business owner at the affected business structure but the owner of the affected building
	Formal and informal employees of affected businesses
Loss of business structures (fully or partially) on affected public parcels	Owner or user of informal business structure
	Not a business owner at the affected business structure but the owner of the affected building
	Formal and informal employees of affected businesses
Business owners who will not be relocated but may experience partial loss of land and/or assets	Owner or tenant of the affected business structure
	Formal and informal employees of affected businesses
(iv) Vulnerable People	
Affected households with vulnerable members – may be exposed to any type of loss/impact given for the above PAP Categories with a more significant level of impact due to vulnerability or disadvantaged condition	All physically and economically displaced households with vulnerable members (please refer to <i>Chapter 12</i> for vulnerability categories)
Vulnerable employees	Informal employees (Employees who are not registered by their business owner at the workplace under the Social Insurance and Universal Health Insurance Law (No. 5510) of Turkey). Employees with vulnerabilities (please refer to <i>Chapter 12</i> for vulnerability categories)
(v) Temporary Losses/Impacts During Construction	
Temporary loss of private parcels during construction (including access restrictions)	Owners/shareholders
	Formal users (formal tenants)
	Informal users
Temporary loss of state-owned parcels during construction (including access restrictions)	Owners (Governmental institutions)
	Formal users (formal tenants)
	Informal users
Non-land related livelihood losses due to construction	Owners and formal/informal users of lands and assets – as applicable
Temporary interruption/disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any
(vi) Impacts During Operation	
Operation phase E&S impacts (e.g. operation noise, vibration, air quality, community health and safety)	Owners and/or formal/informal users of residential structures/houses for which impacts cannot be mitigated to levels compliant with Project standards through operation phase management plans

7.2. Cut-off Date

According to IFC⁴⁶, “**The cutoff date is the date after which any new structures, trees, crops, and other immovable assets will no longer be counted or measured for compensation purposes. The intent of the cutoff date is to avoid opportunistic settlement or construction of new structures by existing households (in the expectation of compensation) in the area earmarked for project use**”.

IFC’s Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) includes the following as key considerations regarding the cut-off date:

“If a cutoff (sometimes called a “moratorium”) is provided by local legislation (usually the case where eminent domain procedures are applied), make sure that the cutoff date as mandated by local legislation (usually the date at which a certain legal act is taken) can correspond to the cutoff date required by PS5 (**the date at which the census and asset surveys are completed**). Typically, the date of publication of a declaration of public interest (or similar eminent domain–related act) will become the cutoff date. The additional requirement of PS5 is to ensure that the cutoff date and its conditions (e.g., no erection of new structures, no planting of new trees and crops) are disclosed, which is not always mandated by local legislation. Aligning the declaration of public interest mandated by local laws with the cutoff date disclosure required by PS5 calls for careful coordination with government agencies and must be planned well in advance.”

Table 7-3 provides a summary of the public benefit (interest) and accelerated expropriation decisions issued to date for the Project.

Table 7-3. Existing Public Benefit and Accelerated Expropriation Decisions

Decision Type	Executing Authority	Decision Date	Decision No.	Scope of the Decision
Public Benefit Decision	MoTI	6 July 2022	2022/138	Motorway
Accelerated Expropriation Decision	Presidency	12 April 2023 ⁴⁷	7060	Certain immovable properties under the scope of the Project (located within the settlements covered by the Decree) by the KGM in line with Article 27 of the Expropriation Law of Türkiye (Law No. 2942, 1983)

In establishing the cut-off date for the Project, the key requirements of IFC PS5, as outlined below, have been taken into account.

IFC PS5 – Paragraphs 12 and 23

Para. 12. “In the absence of host government procedures, the client will establish a cut-off date for eligibility. **Information regarding the cut-off date will be well documented and disseminated throughout the project area.**”

Para. 23. “The client is not required to compensate or assist those who encroach on the project area after the cut-off date for eligibility, provided the cut-off date has been clearly established and made public.”

The Expropriation Law of Türkiye provides a cut-off date definition applicable to the owners and shareholders of properties, as provided below.

⁴⁶ <https://www.ifc.org/content/dam/ifc/doc/2023/ifc-handbook-for-land-acquisition-and-involuntary-resettlement.pdf>

⁴⁷ <https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf>

Article 25 – Restriction of Rights and Transfer of Ownership to the Administration

“In terms of the exercise of rights and the fulfilment of obligations, the expropriation process begins for the property owner with the court notification issued in accordance with Article 10. The transfer of ownership to the administration takes place through the registration decision rendered by the court.

From the date of the court’s registration decision, the property owner’s rights to use the expropriated immovable – such as constructing new buildings, planting crops, or making significant modifications to existing structures – are terminated. Any additions made thereafter are not taken into account in the valuation.

In large-scale infrastructure projects extending over multiple years – such as dams, irrigation systems and pipelines, highways, railways, ports, and airports – the public benefit decision is announced by posting it in the neighbourhood and/or village headman’s office where the expropriated properties are located, for a period of fifteen days. From the end of the announcement period of the public benefit decision, any fixed installations made or trees planted on the expropriated properties are not considered in the determination of the expropriation compensation.

*This **cut-off** restriction on the immovable properties remains valid for five years from the end date of the public announcement.”*

Information Mechanisms under Expropriation Law

The mechanisms through which the people affected by Project-related land acquisition are informed about the asset inventory process and the cut-off date after which newly installed assets will not be compensated are summarised below:

- **Turkish Electronic Government Platform:** In accordance with Article 7 of the Expropriation Law, annotations related to expropriation are added to the title deeds of affected assets. Asset owners and shareholders can access this information through the Turkish electronic government platform (<https://www.turkiye.gov.tr>).
- **On-site Inventory of Assets Studies:** As part of the identification and inventory studies conducted on site in accordance with the Expropriation Law, the boundaries of the expropriation corridor are physically demarcated by field teams using ground stakes. This process serves to clearly define the limits of the affected area.

During on-site inventory studies, local mukhtars and asset owners and shareholders that are present in the affected settlements accompany the field inventory teams. This process involves continuous communication between the appointed national engineering firm (valuation contractor) and affected communities.

During these studies, verbal notifications are given to affected people stating that any assets installed on the affected parcels after the date of the inventory will not be eligible for compensation under the Expropriation Law.

- **Disclosure of parcel and owner lists in affected settlements:** Through KÖSOB, KGM sends official letters to the Mukhtars of the settlements affected by the Project’s land acquisition, informing them of the overall schedule of the Article 8 negotiation meetings to be held with landowners from their settlement. The Mukhtars are requested to post the lists of parcels and owners to be affected by the land acquisition prior to the Article 8 negotiation meetings.
- **Negotiation Meetings and Grievance Mechanism:** During the negotiation meetings held by KGM in accordance with the Expropriation Law, owners and shareholders are provided with the list of assets subject to expropriation and their valuation.

Upon agreement with KGM under Article 8, PAPs sign the inventory of assets. A formal grievance mechanism allows affected owners and shareholder to raise objections regarding inaccuracies or omissions in the asset inventory, either during negotiations or afterward. If a grievance is submitted, KGM revisits and reassesses the asset inventory and makes necessary corrections.

- **Legal Proceedings for Disagreement Cases:** In cases where affected owners or shareholders do not attend negotiation meetings or fail to reach an agreement with KGM, court proceedings are initiated by KGM in accordance with the Expropriation Law.

The timing of legal action is determined by KGM based on the construction schedule agreed with the SPV and the availability of expropriation funds. Courts revalidate or redo the inventory of assets during the proceedings. Affected owners and shareholders may also raise objections during the judicial process.

During the RPF studies, **the SPV has consulted with KGM regarding previous information dissemination efforts and** confirmed that following the completion of the census, asset inventory, and valuation in each settlement and prior to the start of official expropriation procedures through Article 8 negotiation meetings, KGM – through KÖSOB – sends official letters to the Mukhtars of the settlements affected by the Project's land acquisition. These letters require Mukhtars to post the lists of parcels and owners to be affected by the land acquisition and inform them of the overall schedule of the Article 8 negotiation meetings to be held with landowners from their settlement.

Accordingly, and in line with IFC's recommended "rolling" cutoff date approach, the cutoff date in this Project is settlement-specific and is defined as the date on which the list of affected parcels is disclosed at the Mukhtar's office in each settlement, following completion of the census, asset inventory surveys, and valuation. This applies to both the owners and shareholders of the lands and assets, as well as to their formal and informal users.

Additionally, during the Article 8 negotiations, legal right holders are provided with the list of assets subject to expropriation and their corresponding valuations. This constitutes the cutoff date at the individual level.

As needed during the preparation of RAP, supplementary actions will be developed and implemented to meet the additional requirement of PS5 regarding the disclosure of the cutoff date and its conditions (e.g., prohibition on new structures, trees, or crops), covering both formal and informal land users to the extent possible at the individual level.

7.3. Entitlement Matrix

The framework of the Entitlement Matrix for the Project is presented in Table 7-4.

As part of the subsequent RAP to be developed following the approval of this RPF by the Lenders and LESA, this framework will be expanded into a detailed Entitlement Matrix informed by the findings of the RAP surveys.

Table 7-4. Entitlements Matrix

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(i) Affected Lands					
(i)1	Permanent loss of private parcels – agricultural parcels and constructible plots ⁴⁸ (urban lands) (excluding litigious parcels)	Owners/ shareholders	TBD as part of RAP	<p>Compensation: Cash compensation for affected land is provided by the KGM in accordance with the Expropriation Law.</p> <p>Replacement Land: The Expropriation Law allows for replacement land; however, this option is generally not preferred by KGM due to the high volume of parcel acquisitions, the limited availability of land, and the difficulty in prioritising requests.</p> <p>Valuation: Valuation rates for land and assets will be updated by KGM at least annually, as needed. Transaction costs (such as registration, taxes, time lost, cost of transport) may be considered in the valuation but not separately itemised.</p> <p>Negotiations: During Article 8 negotiations, which are based on valuation reports, landowners have the right to either accept or reject the proposed compensation amounts.</p> <p>Agreement: If a consent agreement is reached through Article 8 between KGM and the landowner, the agreed compensation amount is paid by KGM within 45 days following the execution of the agreement protocol.</p> <p>If owners/shareholders do not receive the mandatory cash compensation (expropriation cost) within the period specified in the Expropriation Law (i.e., within 45 days following the execution of the agreement protocol under Article 8), KGM is required to pay legal interest for the period between the due date and the actual payment date – provided that the individual files a claim with the court.</p> <p>No agreement/disagreement case: A court process is initiated under Article 10 to determine the land value through court-appointed experts. The final expropriation value is paid upon the conclusion of the court proceedings.</p> <p>Orphan land: Please refer to (i)5.</p>	<p>1)Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability, if requested by the PAP.</p> <p>KGM will update the valuation rates for land and assets at least annually.</p> <p>2)Top-up Cash Compensation to Achieve Full Replacement Value for Land: - Article 8 agreement case: If replacement land of similar quality, size, and location is identified by the PAP, the transaction costs applicable to the acquisition of replacement will be paid by the SPV after the transaction is completed within a reasonable timeframe after expropriation. - Article 10 or 27 court cases: The final expropriation value will be determined by the court. No top-up cash compensation will be provided by the SPV for the land.</p> <p>3)Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the “(i)11 – Loss of Non-residential Structures and Infrastructure”.</p> <p>4)Small costs in relation with Official Procedures for Land Acquisition: There may be various expenses and travel costs related to deed transfer in negotiated settlements that are not covered by KGM, as they are not stipulated under the Expropriation Law. These costs, which must be borne by landowners, will be covered by the SPV from the RAP Fund provided that the expenses are properly documented.</p> <p>Costs to be covered – based on documented evidence of expenditure and related to negotiations and title deed transactions – are listed below: -Power of attorney costs -Working capital fund (“<i>doner sermaye</i>”) for title deed transactions related to new land purchases, costs will be paid per parcel – not per individual shareholder and associated costs related to inheritance and succession -Inner city transportation costs -Inter city transportation costs</p> <p>5)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions (please refer to Chapter 10).</p> <p>6)Livelihood Restoration, Improvement and Assistance: If the owner/shareholder uses the affected land for agricultural production – regardless of whether they purchase new land – and their livelihoods are affected, they will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
(i)2		Formal Users (Tenants) – with formal tenancy agreements	TBD as part of RAP	<p>No compensation for land is provided to land users under the Expropriation Law.</p> <p>However, formal tenants are eligible for compensation for crops, trees, and any assets or fixed improvements/investments (such as structures) on the rented land, provided they can demonstrate ownership of these crops and assets.</p> <p>Depreciation will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.</p>	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least 3 months⁴⁹ in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p>2)Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed.</p> <p>3)Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the “(i)11 – Loss of Non-residential Structures and Infrastructure” for assets (major^(*) fixed improvements or investments) made or owned by the formal user on the affected land during the tenancy.</p> <p>4)Transitional rental allowance for formal replacement land to be rented (for 1-year) (part of LRP): If the user finds replacement land for formal lease, the SPV will provide one-off transitional support equivalent to the 1-year rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land (depending on the crop type). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year.</p> <p>5)Cash Compensation for Crops and/or Trees of Formal Land Users: Please refer to the “(i)9 for Loss of Crops”; (i)10 for Loss of Trees.</p> <p>6)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions.</p>

⁴⁸ Urban land that has been parcelled by municipalities within municipal boundaries is classified as a constructible plot (referred to as *arsa* in Turkish), in accordance with Article 12 of Türkiye’s Real Estate Tax Law (Law No. 1319). For lands – whether within or outside municipal boundaries – that have **not** been parcelled, the designation as a constructible plot (*arsa* or urban land) is made through a Presidential Decree or other relevant legal instruments, as applicable.

⁴⁹ Wherever possible, the SPV will seek to extend the notification period and make early notifications six months prior to land entry. If this cannot be achieved, any losses experienced by landowners or by formal or informal land users will be compensated by the SPV. This applies to all *Early Consultations and Notification for Land Acquisition Process* entitlements included in the Entitlements Matrix.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(i)3		Informal Users – with no formal tenancy agreements or official documentation	TBD as part of RAP	<p>No compensation for land is provided to land users under the Expropriation Law.</p> <p>However, informal users are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at minimum material cost, in accordance with Article 19 of the Expropriation Law, provided they can demonstrate ownership of these assets.</p> <p>Depreciation will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.</p>	<p>7)<u>Livelihood Restoration, Improvement and Assistance</u>: The land user – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p> <p>1)<u>Early Consultations and Notification for Land Acquisition Process</u>: The SPV will notify the user at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded (same entitlement with formal user).</p> <p>2)<u>Replacement Land Search Support</u>: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed (same entitlement with formal user).</p> <p>3)<u>Cash Compensation at Full Replacement Value for Structures on Affected Land</u>: Please refer to the “(i)11 – Loss of Non-residential Structures and Infrastructure” for assets (major ^(*) fixed improvements or investments) made or owned by the informal user on the affected land.</p> <p>4)<u>Transitional rental allowance for formal replacement land to be rented (for 1-year) (part of LRP)</u>: If the user finds replacement land for formal lease, the SPV will provide one-off transitional support equivalent to the 1-year rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year (same entitlement with formal user).</p> <p>5)<u>Cash Compensation for Crops and/or Trees of Informal Land Users</u>: Please refer to the “(i)9 for Loss of Crops”; (i)10 for Loss of Trees (same entitlement with formal user).</p> <p>6)<u>Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support)</u>: The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions (same entitlement with formal user).</p> <p>7)<u>Livelihood Restoration, Improvement and Assistance</u>: The land user – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 (same entitlement with formal user).</p>
(i)4	Litigious properties <i>(“ihtilafli bulunan mülkiyet”)</i>	Litigants claiming to be rightful owners/ shareholders of litigious properties <u>Note</u> : For the users of litigious parcels, if any, please refer to entitlements outlined for formal and informal users under “(i)1 for Permanent loss of private parcels ”.	TBD as part of RAP	<p>When there is a court dispute regarding the ownership of a parcel (i.e. a litigious parcel), the rightful owners or shareholders eligible for compensation under the Expropriation Law are determined by the court in accordance with Article 18 of the Law. Please refer to Appendix A for the full definition of Article 18, which stipulates, among others, determination of the expropriation value of the immovable property following the procedure set out in Article 10, and, after this amount is deposited by the administration in the bank specified by the court in a three-month term deposit account in accordance with Article 10 for payment to the rightful owner to be determined upon conclusion of the ownership dispute.</p> <p>In cases where the expropriation follows the procedure outlined in Article 10 or 27 (accelerated expropriation), the final expropriation compensation becomes accessible to the owners/shareholders – whose eligibility has been confirmed by the court under Article 18 – only after the completion of the Article 10 process (which follows the Article 27 process in case of accelerated expropriation).</p> <p>If the court rules in favour of the state/treasury, litigious owners/shareholders become illegal occupants.</p>	<p>1)<u>Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support)</u>: The SPV will conduct consultation meetings to inform the litigants claiming to be rightful owners/shareholders of litigious properties about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions.</p> <p>Litigants claiming to be rightful owners/shareholders of litigious parcels that contain houses, structures or business structures will be consulted individually to identify any specific vulnerabilities. The SPV will monitor the court proceedings to mitigate any potentially exacerbated impacts arising from lengthy legal procedures. Tailored measures will then be designed and implemented by the SPV on a case-by-case basis.</p> <p>(*) All entitlements defined for owners under “(i)1 for Permanent loss of private parcels” will apply to litigants claiming to be rightful owners/shareholders whose eligibility for compensation under the Expropriation Law has been validated by the courts through the Article 18 process. These entitlements including any compensation and/or assistance will be delivered by the SPV to the validated rightful owners/shareholders upon completion of the Article 10 process.</p>
(i)5	Orphan lands	Owners/ shareholders <u>Note</u> : For formal (tenants) and informal users please refer to “(i)1 – Permanent loss of private parcels ”.	TBD as part of RAP	<p><u>Minimisation of orphan lands</u>: The expropriation boundary for the Project has been established by KGM with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel, where feasible. To this end, a parcel-based review and assessment covering the full alignment was carried out by KGM and the valuation contractor.</p> <p><u>Right to apply for acquisition of orphan lands</u>: For the unacquired portions that were not previously included in KGM’s expropriation, the owner or shareholder of the affected parcel has the right to formally apply to KGM, in accordance with Article 12 of the Expropriation Law, to request the acquisition of the remaining part of the parcel if it is deemed economically unusable or undevelopable.</p> <p>For all parcels, in line with the Expropriation Law and KGM’s established practice, KGM accepts official applications from affected people – submitted within 30 days of receiving notice of expropriation by agreement – requesting the expropriation of orphan lands and evaluates each application on a case-by-case basis.</p>	<p>In accordance with the Expropriation Law, the owner/shareholder of the affected parcel has the right to officially apply to KGM and request acquisition of the remaining part of the expropriated parcel. The SPV will inform the PAPs about their legal rights as described in this RPF and subsequent RAP (through distribution of KGM’s booklet on procedural steps of expropriation and GLAC and during PAP meetings to be held prior to Article 8 negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required.</p> <p>In case the acquisition request of the owner/shareholders is not concluded positive by KGM, the SPV will commission a third-party valuation expert to review the case and determine the actions required to be taken by SPV, if any.</p> <p>If no agreement is reached under Article 8, the expropriation will proceed through judicial processes (Article 10, or Article 27 followed by Article 10) as outlined in Section 4.2.2. In this case, the final decision for acquisition of the remaining part of the expropriated parcel will be executed by the courts.</p> <p>During Project implementation, the SPV will implement the SEP, including the grievance mechanism, and will maintain ongoing engagement with the affected people, including users of orphan parcels. Economic displacement impacts arising from such orphan lands will be monitored by the SPV throughout RAP implementation, relevant requests submitted by landowners to KGM through petitions will be periodically reviewed by the SPV as part of the Project’s grievance mechanism and any related grievances or losses will be managed primarily on a claim basis or proactively where necessary. This approach will be operationalised through the Project’s grievance mechanism and implementation of livelihood restoration and assistance measures to be set out in the subsequent RAP. The SPV will engage a third-party valuation expert, who has agricultural engineering or economy background and expertise in</p>

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				<p>KGM reviews official applications submitted by PAPs requesting the expropriation of orphan lands, provided that the remaining areas are in line with KGM's criteria for unviable land acquisition criteria.</p> <p>Each application may not necessarily be approved by KGM; however, the owner or shareholder retains the right to seek legal remedy through the courts.</p>	<p>valuation of agricultural properties using net income method, to review each case/claim individually and determine the actions required to be taken by SPV, if any (e.g. provision of compensation for the unacquired part in case the unacquired part is economically unusable or undevelopable).</p> <p>In cases where a zoning parcel (if any) has already undergone road relinquishment and there are claims or grievances raised by relevant PAPs, the SPV will commission a third-party valuation expert to ensure a fair assessment of value reduction in the remaining part and advise the KGM accordingly. The third-party valuation expert will be supported by the Project's technical and design teams to incorporate technical specificities into the assessments.</p> <p>All other entitlements defined for the owners/shareholders "Permanent loss of private parcels" are applicable to the owner/shareholders of the orphan lands.</p>
(i)6	<p>Permanent loss of state-owned parcels (treasury, non-registered)</p> <p>– which are used for agriculture or other income generating activities</p>	<p>Owners</p>	<p>Governmental institutions</p>	<p>Treasury lands and unregistered parcels are allocated to the Project upon KGM's application, without any payment.</p> <p>No compensation for land is provided to land users under the Expropriation Law.</p>	-
		<p>Formal Users</p> <p>– with official documentation</p>	<p>TBD as part of RAP</p>	<p>However, formal users of state-owned lands (e.g. treasury parcels) are eligible for compensation for crops, trees, and any assets or fixed improvements/ investments (such as structures), provided they can demonstrate ownership of these crops and assets.</p> <p>Depreciation will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.</p>	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with land users have been concluded.</p> <p>2)Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed.</p> <p>3)Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the "(i)12 – Loss of Non-residential Structures and Infrastructure" for assets (major ⁽¹⁾ fixed improvements or investments) made or owned by the formal user on the affected land.</p> <p>4)Transitional rental allowance for formal replacement land to be rented (for 1-year) (as part of LRP): If the user finds replacement land for formal lease, the SPV will provide one-off transitional support equivalent to the 1-year rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land (depending on the crop type). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year.</p> <p>5)Cash Compensation for Crops and/or Trees of Formal Land Users: Please refer to the "(i)9 for Loss of Crops"; (i)10 for Loss of Trees.</p> <p>6)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions.</p> <p>7)Livelihood Restoration, Improvement and Assistance: The land user – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
		<p>Informal Users</p> <p>– with no official documentation</p>	<p>TBD as part of RAP</p>	<p>No compensation for land is provided to land users under the Expropriation Law.</p> <p>However, informal users – excluding those occupying forest and pasture lands – are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at minimum material cost, in accordance with Article 19 of the Expropriation Law, provided they can demonstrate ownership of these assets.</p> <p>Informal users of forest and pasture lands are considered as illegal occupants ("işgalci"), are not entitled to any form of legal compensation for either the land or the assets.</p>	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with land users have been concluded (same entitlement with formal user).</p> <p>2)Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed (same entitlement with formal user).</p> <p>3)Cash Compensation at Full Replacement Value for Structures on Affected Land: Please refer to the "(i)12 – Loss of Non-residential Structures and Infrastructure" for assets (major ⁽¹⁾ fixed improvements or investments) made or owned by the informal user on the affected land.</p> <p>4)Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide one-off transitional support equivalent to the 1-year rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year (same entitlement with formal user).</p> <p>5)Cash Compensation for Crops and/or Trees of Informal Land Users: Please refer to the "(i)9 for Loss of Crops"; (i)10 for Loss of Trees (same entitlement with formal user).</p> <p>6)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RPF and subsequent RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions (same entitlement with formal user).</p> <p>7)Livelihood Restoration, Improvement and Assistance: The land user – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 (same entitlement with formal user).</p>

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	Permanent loss of pasture lands	Users of registered pasture parcels within expropriation corridor or at the footprint of facilities outside the corridor	TBD as part of RAP	Payments for pasture lands as required by Pasture Law are made by KGM to the Treasury. No compensation is provided to the communities for the loss of grazing lands unless the pastures are registered in the name of the village legal entity, in accordance with the Turkish Expropriation Law.	<p>1) Replacement Land Search Support: Impacts on users of pasture lands will be analysed as part of the subsequent RAP, based on the review of expropriation plans (to identify parcels registered as pasture), as well as RAP field surveys that will determine the actual use of these pasture lands. In the event of impacts on pasture lands, the SPV will assist the communities through settlement heads in finding alternative grazing land of comparable quality, size, and location, in coordination with the relevant authorities.</p> <p>2) Livelihood Restoration, Improvement and Assistance: The land (pasture) users – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 (same entitlement with formal user), which would be tailored to compensate impact on grazing activities.</p> <p>3) Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.</p>
(i)7	Restriction of access to grazing lands located out of Project expropriation corridor (public or private) due to fragmentation or other Project-related factors	Users of grazing lands exposed to access restriction impacts	TBD as part of RAP	No compensation is provided to the communities for restriction of access.	<p>1) Monitoring, Grievance Management and Corrective Measures: Impacts on users of grazing lands (including land fragmentation) will be analysed as part of the subsequent RAP, based on the review of expropriation plans and the locations of engineering (crossing) structures such as underpasses, overpasses, bridges, etc., and findings of the RAP surveys. Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional engineering (crossing) structures where feasible and necessary.</p> <p>2) Livelihood Restoration, Improvement and Assistance: In the event of access restriction impacts, the land users – whose livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on grazing activities.</p>
(i)8	Loss of forest parcels – for the compensation of structures, trees or houses on forest lands, please refer to relevant rows [(ii)2]	Users of forest parcels within the expropriation corridor or at the footprint of facilities outside the corridor	TBD as part of RAP	Forest permits are obtained by KGM in accordance with the provisions of the Forest Law.	<p>The houses, structures and trees on forest lands are not compensated by KGM in accordance with the law. For the compensation and assistance to be provided by the SPV through this RPF and subsequent RAP, please refer to relevant rows (Affected Trees, Affected Houses) in this Entitlements Matrix.</p> <p>The following applies to the users of forest for other formal or informal economic activities (such as grazing, collecting products), if any:</p> <p>1) Monitoring, Grievance Management and Corrective Measures: Impacts on users of forest lands (including land fragmentation) will be analysed as part of the subsequent RAP, based on the review of expropriation plans and the locations of engineering (crossing) structures such as underpasses, overpasses, bridges, etc., and findings of the RAP surveys. Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.</p> <p>2) Livelihood Restoration, Improvement and Assistance: In the event of access restriction impacts, the users of forest for economic activities – whose livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on forest lands.</p>
(i)9	Loss of crops	Owners of the crops – owner or formal/informal user of the land	TBD as part of RAP	According to Article 20 of the Expropriation Law, the evacuation of cultivated lands that are subject to expropriation must take place after the harvest period. If land entry occurs before harvesting, the crop owners are entitled to compensation. In practice, crop compensation is not included in the valuation conducted by KGM under the Expropriation Law. KGM complies with Article 20, or – for BOT projects – requires the private partner to fulfil the requirements of Article 20 in cases where land entry occurs before the harvesting period.	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded (same entitlement with formal and informal land user).</p> <p>2) Cash Compensation for Crops of Formal or Informal Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) are made to the owners of the crops and trees prior to land entry. These payments will be documented through protocols and bank transactions.</p> <p>3) Livelihood Restoration, Improvement and Assistance: The land users – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
(i)10	Loss of trees (fruit or non-fruit trees)	Owners of the trees (owner or formal/informal user of the land)	TBD as part of RAP	<p>Valuation: In accordance with the Expropriation Law, cash compensation is provided by KGM to the owner of the trees on private lands or public lands used formally. The valuation of agricultural trees is carried out in line with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": "The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports".</p> <p>For trees in the preparation and maintenance period (i.e. before entering the productive stage), compensation is determined using the capitalisation method. This includes costs associated with labour, machinery, and materials for cultivation, planting,</p>	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded (same entitlement with formal and informal user).</p> <p>2) Cash Compensation for Trees on Forest and Pasture Lands: If there are trees owned by informal users on affected forestry or pasture lands, which are not subject to compensation by KGM, the compensation at Full Replacement Cost will be determined by a third-party valuation expert to be commissioned by the SPV. Cash compensation reflecting this value will be provided to the informal users by the SPV from the RAP Fund.</p> <p>3) Cash Compensation for Produce/Fruits of Formal or Informal Land Users: In the case of produce/fruits on affected trees (with yielding produce), if land entry by the EPC Contractor is required before the harvesting period, the SPV will ensure that payments for products (e.g., fruits) are made to the owners of the trees prior to land entry. These payments will be documented through consent protocols and bank transactions.</p>

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				<p>irrigation, fertilization, pesticide application, and other relevant agricultural inputs, along with the rental value of the land.</p> <p><u>Trees owned by informal land users:</u> Pursuant to Article 19 of the Expropriation Law, when trees are located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, compensation is paid to the possessor of the trees. This does not apply to trees on forest or pasture parcels.</p>	<p><u>3) Livelihood Restoration, Improvement and Assistance:</u> In addition to the cash compensation provided by KGM in accordance with the Expropriation Law, owners of trees may request the relocation and transplantation of their trees. In such cases, support will be provided by the EPC teams so that the trees are transplanted to a suitable location identified by the owner. If relocation is not requested, the tree debris will be left to the owner of trees, if requested.</p> <p>In addition, the land users – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
(i)11	<p>Loss of structures on affected private parcels</p> <p>(non-residential/ secondary structures, fences, barns, sheds, infrastructure)</p>	<p>Owners of major(*) non-residential structures who are either landowners or formal tenants/users with official documentation</p>	TBD as part of RAP	<p>In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables, issued in February 2019.</p> <p>Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.</p> <p>In cases of joint landownership, compensation is paid to the actual owner of the structure provided that he or she has obtained formal consent from the other co-owners confirming ownership rights.</p> <p>If such consent is not available, cash compensation is distributed among all landowners in proportion to their registered shares.</p> <p><u>Incomplete construction ("eksik imalat"):</u> The unit construction costs published by the Ministry of Environment, Urbanisation and Climate Change are calculated under the assumption that the buildings possess the standard characteristics they are supposed to have under normal conditions. However, if the expropriated building has features that fall short of these standards, the costs corresponding to the deficiencies is calculated and deducted from the total value of the structure. This situation is frequently encountered, especially with older buildings. For example, if a building subject to valuation lacks plaster as a construction component, the cost of the plaster must be calculated and subtracted from the total value of the building. Supreme Court rulings also emphasize that the internal and external features of the disputed structure (e.g., water, electricity, and sewer systems, wet and dry floor coverings, roof materials, etc.) must be examined in detail, and the structure's value should be determined after deducting the cost of any missing components⁵⁰ (Anonymous, 2015; Anonymous, 2016; Anonymous, 2018). Just as the cost of additional features such as a jacuzzi, sauna, built-in cupboards, wood paneling, parquet flooring, ceramic tiles, and central heating system, if present in an individual unit but not in others, should be added to the total cost, similarly, deducting the cost of missing elements is a reasonable practice and is not considered inconsistent with compliance with international standards.</p>	<p><u>1) Early Consultations and Notification for Land Acquisition Process:</u> The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p><u>2) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land:</u> Top-up cash compensation will be provided by the SPV from the RAP Fund to the actual owner(s) of major(*) structures (based on evidence of structure ownership) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM.</p> <p>Agreement cases (as per Article 8): The payment will be made within 45 calendar days following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owners/shareholders by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the Purchase Agreement Protocol.</p> <p>OR</p> <p>for cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made by the SPV within 45 calendar days following the initial drawdown of the SPV.</p> <p>Disagreement cases (Article 10 or Article 27 followed by Article 10):</p> <p>-Direct Article 10 court cases as per Law (no Article 27): The payment will be made within 45 calendar days following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the court decisions.</p> <p>-Article 27 court cases as per Law: The payment will be made within 45 calendar days following the determination of the land seizure value by the courts at the conclusion of the Article 27 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the Article 27 court decisions.</p> <p><u>3) Moving Assistance and/or Allowance:</u> If the affected structures are movable, and upon request by the structure owners, the SPV will provide assistance in relocating them to replacement land or another suitable location identified by the PAP.</p> <p><u>4) Other measures:</u> The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>
		<p>Owners of major(*) non-residential structures who are informal users of private lands (with no title deed but can prove their ownership of the structure)</p>	<p>As per Article 19 of the Expropriation Law, for buildings or structures located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, the minimum material cost of the structure is paid to the possessor.</p>	<p><u>1) Early Consultations and Notification for Land Acquisition Process:</u> The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p><u>2) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land:</u> If there are major(*) structures (fixed improvements or investments) made or owned by the informal user (structure owner) on the affected land, KGM pays for minimum material cost as per Article 19 of the Expropriation Law; top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings).</p> <p><u>3) Moving Assistance and/or Allowance:</u> If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.</p> <p><u>4) Other measures:</u> The owner of the structures will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>	

⁵⁰ Anonymous, 2015. Supreme Court Decision. 5th Civil Chamber, No: 2014/23596, Decision: 2015/5990, Date: 25.03.2015; Anonymous, 2016. Supreme Court Decision. 5th Civil Chamber, No: 2016/12246, Decision: 2016/17970, Date: 22.12.2016; Anonymous, 2018. Supreme Court Decision. 5th Civil Chamber, No: 2018/6157, Decision: 2018/19026, Date: 25.10.2018.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
		Owners of major(*) non-residential structures who are informal users of private lands (with no official documentation proving their ownership of the structure)	TBD as part of RAP	No compensation is provided under the Expropriation Law.	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p>2) Cash Compensation at Full Replacement Value: If the structure owner(s) (informal land users) cannot prove their ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund.</p> <p>3) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.</p> <p>4) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>
(i)12	Loss of structures on affected public parcels (non-residential/ secondary structures, fences, barns, sheds, infrastructure)	Owners of major(*) non-residential structures who are formal tenants/ users of public lands with official documentation	TBD as part of RAP	In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with <i>KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables</i> , issued in February 2019. Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p>2) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Top-up cash compensation will be provided by the SPV from the RAP Fund to the actual owner(s) of the major(*) structure, in order to cover the depreciation deducted from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets.</p> <p>3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.</p> <p>4) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>
		Owners of major(*) non-residential structures who are informal users of public lands – excluding those occupying forest and pasture lands – with no official documentation for land use but can prove their ownership of the structure		As per Article 19 of the Expropriation Law, for buildings/structures on lands with title deeds belonging to others, lands which do not have owners, and/or lands not acquired by their possessors, minimum material cost of the structure is paid to the possessor.	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p>2) Top-up Cash Compensation to achieve Full Replacement Value on Affected Land: In case there are major(*) structures (fixed improvement/investments) made/owned by the informal user (structure owner) on the affected land, KGM pays for minimum material cost as per Article 19 of the Expropriation Law; top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings).</p> <p>If the assets owner (informal land users) cannot prove her/his ownership claim or the assets made/owned by the informal user (structure owner) on the affected land are not compensated by KGM, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund.</p> <p>3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.</p> <p>4) Other measures: The owner of the structures will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>
		Owners of major(*) non-residential structures on forestry and pasture lands or structure owners with no official documentation proving their ownership of the structure		No compensation is provided under the Expropriation Law.	<p>1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least 3 months in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded.</p> <p>2) Cash Compensation at Full Replacement Value: If the structures owned by informal users (structure owner) are on forestry and pasture lands, which are not subject to compensation by KGM, or if the assets owner (informal land users) cannot prove her/his ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund.</p> <p>3) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.</p> <p>4) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.</p>
(i)13	Establishment of servitude (easement) resulting in a reduction in the value of the immovable asset	Owners of parcels subject to acquisition through the constitution of servitude (easement rights)	TBD as part of RAP	<p>In accordance with Article 4 of the Expropriation Law, instead of acquiring full ownership of immovable assets, easement rights may be established through expropriation on a specific section, height, depth, or source of the immovable, provided that such rights are sufficient to serve the intended purpose.</p> <p>In the Project, easement rights will apply to any privately owned parcels that are affected by the OHTL or other infrastructure displacement-related works. In such cases,</p>	<p>1) Monitoring, Grievance Management and Corrective Measures: Where applicable, the constitution of servitude for any Project-related displacement works (e.g. infrastructure) will be monitored by the SPV during both the construction and operation phases, in collaboration with KGM, and in accordance with the procedures outlined in the Expropriation Law. The SPV will also consult affected owners or users (if any) to identify potential grievances and/or risks (e.g. loss of property value).</p> <p>As required, any grievances related to compensation for loss of land value under the Expropriation Law, and during the construction and operation phases, will be assessed by the SPV, with support from third-party valuation experts as necessary. Based on these</p>

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				<p>expropriation will be carried out, and easement rights (servitude – <i>irtifak</i>) for the (i.e. underwire alignment for the OHTLs) alignments will be established by KGM in accordance with the Expropriation Law and the approved expropriation plans.</p> <p>Cash compensation for easement rights – reflecting the value of any potential restrictions on land use – is determined by KGM's asset valuers and paid to the owners/shareholders for the alignments (i.e. underwire alignment for the OHTLs). As stipulated by the Law, ownership rights remain with the landowner, subject to the implementation of necessary safety measures.</p>	<p>assessments, corrective measures (e.g. compensation for damages) will be planned and implemented by the SPV on a case-by-case basis.</p> <p>2) <u>Livelihood Restoration, Improvement and Assistance</u>: The users of affected lands – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
(ii) Affected Houses					
(ii)1	Loss of formal residential houses on affected private parcels	Owner of affected house	<u>Houses on private lands</u> : TBD as part of RAP	<p>In accordance with the Expropriation Law, cash compensation for residential structures on private parcels is provided by KGM. The valuation of these assets is conducted in line with <i>KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables</i>, issued in February 2019, valuers based on building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.</p> <p>Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.</p> <p>In cases of joint landownership, compensation is paid to the owner of the structure, provided that he or she has obtained formal consent from the other co-owners of the land confirming ownership rights.</p> <p>If such consent is not available, cash compensation is distributed among all landowners in proportion to their registered shares.</p>	<p>1)<u>Early Consultations and Notification for Land Acquisition Process</u>: The SPV will notify the owner of the affected houses at least six months in advance of the land entry.</p> <p>Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the actual residents of the affected house.</p> <p>OR</p> <p>If expropriation has already been concluded (through Article 8, direct Article 10 or Article 27), the SPV will notify the owner of the Project schedule, and the owner will be granted a six-months period to vacate the property following the notification. In cases where this timeframe cannot be provided, alternative case-specific support mechanisms will be agreed with the affected households and implemented accordingly.</p> <p>2)<u>Top-up Cash Compensation to achieve Full Replacement Value for the Affected Residential Structure</u>: Cash compensation for affected land is provided by the KGM in accordance with the Expropriation Law. The SPV will provide entitlements to landowners as specified under “(i)1 – Permanent Los of Private Parcels.”</p> <p>Top-up cash compensation for the residential house will be provided by the SPV from the RAP Fund to the structure owner (based on proof) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM.</p> <p>Agreement cases (as per Article 8): The payment will be made within 45 calendar days following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the Purchase Agreement Protocol.</p> <p>For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made by the SPV within 45 calendar days following the initial drawdown of the SPV.</p> <p>Disagreement cases (Article 10 or Article 27 followed by Article 10): -Direct Article 10 court cases as per Law (no Article 27): The payment will be made within 45 calendar days following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the court decisions. -Article 27 court cases as per Law: The payment will be made within 45 calendar days following the determination of the land seizure value by the courts at the conclusion of the Article 27 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the Article 27 court decisions.</p> <p>In cases of joint landownership, the SPV will monitor whether the homeowner, who is the actual resident, has obtained formal consent from the other non-resident co-owners of the land confirming their ownership rights. If such consent is not in place, the SPV will plan and implement corrective actions, including helping the actual resident engage – and, if possible, reach an agreement with other shareholders – with support from KGM officials, to ensure that the homeowner (actual resident) receives compensation for the house at full replacement cost or provided with a replacement house. If the house owner (actual resident) cannot receive full compensation, top-up compensation will be provided by the SPV from the RAP Fund, in cases where this situation limits their ability to build or relocate to a replacement house.</p> <p>3)<u>House Relocation Support Package</u>: The SPV will provide a cash compensation package to the homeowner (actual resident) prior to relocation, to cover the following potential relocation-related cost, if incurred within a reasonable timeframe after expropriation.</p> <p><u>Title deed transfer costs</u>: 2% of the building value (as identified in the Article 8 Purchase Agreement Protocol or in the Article 10 or 27 Court Decisions – without depreciation) <u>Real estate agent service fee</u>: 2% of the building value (as identified in the Article 8 Purchase Agreement Protocol or in the Article 10 or 27 Court Decisions – without depreciation) <u>Working capital fund (“doner sermaye”)</u> for title deed transactions for new purchases (specific to each district), <u>Discomfort Allowance</u> for other relocation related expenses: 500 EUR per household for utility subscription fees, changing identification documents, new enrolment processes, etc.</p> <p>During the early consultations and notification for land acquisition process, the SPV will provide written information to the owner detailing the content, amount, and delivery timeline of the House Relocation Support Package.</p>

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					<p>For the delivery of cash compensation, following the early consultations and notification for land acquisition process, the SPV will require the homeowner (actual resident) to sign a Relocation Protocol, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the homeowner regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism.</p> <p>The package will be delivered as a one-off cash compensation within 15 days following the execution of the Relocation Protocol between the homeowner and the SPV.</p> <p>4)Replacement House Search Support and Support for Replacement Housing Construction: In addition to the House Relocation Support Package, the SPV will assist in finding a replacement residential house of equal or greater value, with equivalent or better characteristics and a comparably advantageous location or identifying suitable replacement land for the construction of a new house at acceptable standards with security of tenure. The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as private, treasury, non-registered), if available, on which the house can be built with security of tenure.</p> <p>Additionally, the SPV and EPC construction teams will assign civil engineers and technicians to advise and supervise affected individuals – as needed – who prefer to construct their own houses. These technical personnel will provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding. Where necessary and appropriate, construction machinery and equipment will be temporarily provided to assist affected households during the construction of their replacement homes.</p> <p>5)Moving and travelling allowance: The SPV will directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the owners – whichever is appropriate – based on submitted evidence or documentation, at the time the expenses are incurred.</p> <p>6)Right to salvage materials: The homeowner will be granted the right to salvage recoverable building materials prior to demolition.</p> <p>7)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation – particularly for households with vulnerable members – will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams:</p> <ul style="list-style-type: none"> -Assistance with registering children at new schools, if needed -Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) -Case-specific measures to ensure the comfort of vulnerable household members during relocation <p>8)Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected homeowners) on which the impacted house is located – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
		Formal user (formal tenant)	TBD as part of RAP	In accordance with the law, no compensation is provided to formal tenants. However, the owner and tenant may reach a separate agreement based on the terms and conditions of the tenancy contract.	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the tenant of the affected houses at least six months in advance of the land entry.</p> <p>Land entry will only occur after the expropriation process has been finalised, including the payment of compensation to the owner, or once mutual agreements/consent protocols have been concluded with the actual residents of the affected house.</p> <p>2)House Relocation Support Package: The SPV will provide a cash compensation package to the tenants of houses prior to relocation, to cover the following relocation-related costs.</p> <p>Rental allowance: A three-month rent allowance, based on the market rental rate of the replacement house to be rented</p> <p>Real estate agent service fee: Equivalent to the market rental rate of the replacement house to be rented</p> <p>Discomfort Allowance for other relocation related expenses: 500 EUR per household for utility subscription fees, tenancy registration, etc.</p> <p>Allowance for unforeseen expenses (such as fixed investments made by the renter): assumed 10% of the house relocation support package for RAP budgeting purposes. This amount will be provided if such expenses (e.g., fixed investments made by the renter) are confirmed by the SPV and agreed with the PAPs based on evidence or field identifications.</p> <p>During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the House Relocation Support Package.</p> <p>For the delivery of cash compensation, following the early consultations and notification for land acquisition process, the SPV will require the tenant to sign a Relocation Protocol, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or</p>

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					<p>objections raised by the tenant regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism.</p> <p>The package will be delivered as a one-off cash compensation within 15 days following the execution of the Relocation Protocol between the tenant and the SPV.</p> <p>3)Replacement House Search Support: In addition to the relocation support package, if requested by the PAP, the SPV will provide assistance for finding replacement residential house of equal or higher value (with equivalent of better characteristics and advantageous location).</p> <p>4)Moving and travelling allowance: The SPV will directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the tenants based on submitted evidence or documentation, at the time the expenses are incurred.</p> <p>5)Right to salvage materials: The tenant will be granted the right to salvage recoverable building materials – if such materials belong to the tenant – prior to demolition, in accordance with any applicable provisions of the rental agreement between the tenant and the owner.</p> <p>6)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation – particularly for households with vulnerable members – will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams:</p> <ul style="list-style-type: none"> -Assistance with registering children at new schools, if needed -Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) -Case-specific measures to ensure the comfort of vulnerable household members during relocation <p>7)Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected tenants) on which the impacted house is located – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
		Informal users	TBD as part of RAP	In accordance with the law, no compensation is provided to informal tenants.	The same entitlements specified for formal users (above) will apply, where applicable.
(ii)2	Loss of informal residential houses on affected public parcels	Owner and user of informal house on public lands	<u>Houses on public lands:</u> TBD as part of RAP	<p>As per Article 19 of the Expropriation Law, for buildings/structures on lands with title deeds belonging to others, lands which do not have owners, and/or lands not acquired by their possessors, minimum material cost of the structure is paid to the possessor. No compensation is provided for land.</p> <p>In accordance with the law, no compensation for house or land is provided to owners of informal houses on forest or pasture land.</p>	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the affected houses at least six months in advance of the land entry.</p> <p>2)Cash Compensation at Full Replacement Value for Residential Building: If KGM pays for minimum material cost as per Article 19 of the Expropriation Law (for registered fixtures/structures – <i>muhdesat</i>), top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the homeowner (actual resident of the affected house) by the SPV from the RAP Fund (only for structures/buildings).</p> <p>If KGM does not provide any compensation (e.g. for structures on forest or pasture), cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the homeowner (based on proof).</p> <p>The payment will be made together with the House Relocation Support Package (next item).</p> <p>3) House Relocation Support Package: The SPV will provide a cash compensation package to the owners of informal houses prior to relocation, to cover the following relocation-related costs.</p> <ul style="list-style-type: none"> -Discomfort Allowance for other relocation related expenses: 500 EUR per household for utility subscription fees, tenancy registration, changing identification documents, new enrolment processes, etc. -Allowance for unforeseen expenses (such as fixed investments made by the informal house owner): assumed 10% of the house relocation support package for RAP budgeting purposes. This amount will be provided if such expenses (e.g., fixed investments made by the renter) are confirmed by the SPV and agreed with the PAPs based on evidence or field identifications. <p>During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the House Relocation Support Package.</p> <p>For the delivery of cash compensation, following the early consultations and notification for land acquisition process, the SPV will require the informal homeowner to sign a Relocation Protocol, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the informal homeowner regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism.</p> <p>The package will be delivered as a one-off cash compensation within 15 days following the execution of the Relocation Protocol between the owner and the SPV.</p> <p>4)Replacement Land Search Support and Support for Replacement Housing Construction: The SPV will assist in finding a replacement residential house or identifying suitable replacement land for the construction of a new house at acceptable standards</p>

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					<p>with security of tenure. The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the house can be built with security of tenure.</p> <p>Additionally, the SPV and EPC construction teams will assign civil engineers and technicians to advise and supervise affected individuals who prefer to construct their own houses. These technical personnel will provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding. Where necessary and appropriate, construction machinery and equipment will be temporarily provided to assist affected households during the construction of their replacement homes.</p> <p>5)Moving and travelling allowance: The SPV will either arrange the full relocation, directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the owners, based on submitted evidence or documentation, at the time the expenses are incurred.</p> <p>6)Right to salvage materials: The informal homeowner will be granted the right to salvage recoverable building materials prior to demolition.</p> <p>7)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams:</p> <p>Assistance with registering children at new schools, if needed Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) Case-specific measures to ensure the comfort of vulnerable household members during relocation</p> <p>8)Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected informal homeowners) on which the impacted house is located – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.</p>
(iii) Affected Businesses					
Business owners					
(iii)1	<p>Loss of business structures (fully or partially) on affected private parcels</p> <p>(may include businesses which will be</p> <p>(i) resettled permanently,</p> <p>(ii) shut-down business operations,</p> <p>(iii) continue operations at the same place with partial loss of land and/or assets)</p>	<p><u>May include the following:</u></p> <p>Formal or informal business owners who are the “owner” of the affected business structure</p> <p>Formal or informal business owners who are the “tenants” at the affected business structure</p> <p>Not a business owner at the affected business structure but the owner of the affected building</p>	<p><u>Business structures on private parcels:</u> TBD as part of RAP</p>	<p>As per the Expropriation Law, cash compensation is provided to structure owners by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.</p> <p>Depreciation is deducted in accordance with the depreciation ratios set out in the relevant Turkish legislation.</p> <p>In cases where tenant business owners operate at the affected business structure, and both the owner and the tenants provide their consent, KGM would directly compensate the tenants for the movable and non-movable assets determined to be in their ownership. If there is no agreement between the owner and the tenants regarding the ownership of the assets included in the valuation, KGM would provide compensation to the identified asset owner. Any disputes between the parties may subsequently be pursued under the relevant national legislation, should they choose to do so.</p>	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner (structure owner or tenant) at least six months in advance of the land entry.</p> <p>Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the owner of the business structures/business owners.</p> <p>The SPV will closely collaborate with KGM in the planning and execution of the building’s evacuation, ensuring full alignment with Lenders’ requirements to prevent forced eviction.</p> <p>2)Top-up Cash Compensation to achieve Full Replacement Value for the Affected Business Structure:</p> <p>Top-up cash compensation for the affected business structure will be provided by the SPV from the RAP Fund to the structure owner(s) (based on proof) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM.</p> <p>Cash compensation for affected land on which the business structure is located is provided by the KGM – separate from structure value – in accordance with the Expropriation Law. The SPV will provide entitlements to landowners as specified under “(i)1 – Permanent Los of Private Parcels.”</p> <p>Agreement cases (as per Article 8): The payment will be made within 45 calendar days⁵¹ following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the Purchase Agreement Protocol.</p> <p>For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made within 45 calendar days following the initial drawdown of the SPV.</p> <p>Disagreement cases (Article 10 or Article 27 followed by Article 10): -Direct Article 10 court cases as per Law (no Article 27): The payment will be made within 45 calendar days following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the court decisions.</p>

⁵¹ This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

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					<p>-Article 27 court cases as per Law: The payment will be made within 45 calendar days following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the Article 27 court decisions.</p> <p>3)Business Relocation Support Packages: The SPV will provide a Business Relocation Support Packages to business owners. The content of the packages will be determined as part of the RAP, separately for structure owners and tenants, taking into account the formality or informality of their operations, but will consist of the following items, as necessary:</p> <ul style="list-style-type: none"> • Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost done by the business owner at the <u>existing</u> business structure will be paid by the SPV to business owner. This will cover fixed investments/improvements done for the interiors and exteriors of the building. • Moving allowance to cover disassembly, transportation and assembly costs for relocation of movable assets (e.g. machinery, equipment, stock of materials/products, etc.) to the new workplace. • Business relocation support package to cover other relocation-related expenses such as real estate agent service fee, title deed transfer costs (for owners), rental allowance (for tenants) potential transaction costs, subscription fees, permit renewal costs • including preparation of relevant documentation, cost of approvals to be secured from related authorities, etc. • Post-relocation net income support, as needed. <p>Tailored package for businesses that shut-down due to Project's land acquisition (if any) including opportunities for Project employment.</p> <p>For the delivery of cash compensation, following the early consultations and notification for land acquisition process, the SPV will require the business owner to mutually sign a Relocation Protocol undertaking to relocate to new workplace as per the timeframe to be agreed with the SPV (in alignment with the expropriation programme of KGM and up-to-date construction programme of SPV) on condition that the Business Relocation Support Package is delivered by the SPV within the agreed timeframes.</p> <p>For both Agreement (as per Article 8) and Court cases as per Law, the package will be delivered either at once (one-off cash compensation) or based on milestones. This will be decided by the SPV in consultation with the affected business owners</p> <p>The SPV will coordinate the process in alignment with the corporate procedures of SPV regarding management of administrative affairs and procurement processes. For example, the SPV may prefer to directly pay the invoice of the moving/logistics firm or provide the moving allowance to business owner (method to be decided by the SPV during implementation based on corporate administrative and procurement policies).</p> <p>During the early consultations and notification for land acquisition process, the SPV will provide written information to the business owner detailing the content, amount, and delivery timeline of the Business Relocation Support Package.</p> <p>4)Right to salvage materials: The business owner will be granted the right to salvage recoverable building materials – if such materials belong to the business owner – prior to demolition.</p>
(iii)2	Loss of business structures (fully or partially) on affected public parcels	Owner or user of informal business structure Not a business owner at the affected business structure but the owner of the affected building	<u>Business structures on treasury, forest, pasture parcels</u> TBD as part of RAP	As per Article 19 of the Expropriation Law, for buildings/structures on lands with title deeds belonging to others, lands which do not have owners, and/or lands not acquired by their possessors, minimum material cost of the structure is paid to the possessor. No compensation is provided for land. In accordance with the law, no compensation for the business structure or land is provided to owners of informal business structures on forest or pasture lands.	<p>1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner at least six months in advance of the land entry.</p> <p>2) Cash Compensation at Full Replacement Value for Residential Building: Cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the structure owner (based on proof). The payment will be made together with the house relocation package (next item).</p> <p>3) Pre-relocation Financial Support Package for Business owners House Relocation Support Package: The SPV will provide a cash compensation package to the owners of informal business structures prior to relocation. The content and delivery method will be same with the package offered to owners of formal business structures.</p> <p>During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the House Relocation Support Package.</p> <p>4)Replacement Land Search Support: The SPV will assist in finding a replacement business structure or identifying suitable replacement land for the construction of a new business structure at acceptable standards with security of tenure. The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the business structure can be built with security of tenure.</p> <p>5)Post-relocation Financial Support Package for Business owners: The content and delivery method will be same with the package offered to owners of formal business structures.</p> <p>6)Right to salvage materials: The business owner will be granted the right to salvage recoverable building materials – if such materials belong to the business owner – prior to demolition.</p>

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(iii)3	Business owners who will not be relocated but may experience partial loss of land and/or assets	Owner or tenant of the affected business structure	TBD as part of RAP	In accordance with the Expropriation Law, cash compensation is provided by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. Structures owned by tenants are compensated in accordance with the conditions set forth in the Expropriation Law.	<p>1)Top-up Cash Compensation to Cover Depreciation Cost of the Affected Buildings/Structures to ensure compensation at Full Replacement Cost. For Article 8 agreement cases, the depreciation amounts to be covered will be determined based on the final expropriation values agreed during the negotiations and indicated on the Purchase Agreement Protocol.</p> <p>For direct Article 10 court cases as per Law (no Article 27), the depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the court decisions.</p> <p>For Article 27 court cases as per Law, the depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the Article 27 court decisions.</p> <p>In cases where KGM is unable to expropriate affected elements or structures, the SPV will ensure that the replacement cost equivalent payment is covered through the RAP Fund. This may include situations where businesses extend onto land not legally owned by them (e.g., roadside areas), and such structures are therefore not eligible for compensation by KGM. In these cases, the SPV will provide compensation to ensure full replacement cost for the affected users.</p> <p>2)Support by Construction Teams and Grievance Mechanism: Where appropriate, support will be provided by the SPV/EPC Contractor's construction team and vehicles to prevent potential access restrictions to the site – such as at entry/exit gates, ramps, or for the reorganisation of the layout of movable structures.</p> <p>The SPV/EPC Contractor will provide assistance for relocating affected movable structures and auxiliary facilities to another location within the existing premises or nearby surroundings. The moving process for these assets will be coordinated in consultation with the business owner to minimise any interruption to business operations.</p> <p>3)Monitoring, Grievance Management and Corrective Actions: The SPV will collect, manage, and monitor requests and grievances in accordance with the Project's Grievance Mechanism. Any impacts on business operations – such as access restrictions caused by construction or during the operational phase – will be identified on a case-by-case basis, and corrective actions will be developed and implemented in consultation with the business owners.</p>
Employees					
(iii)4	Temporary or permanent income loss by the employees	Formal and informal employees of affected businesses (incl. employees with vulnerabilities such as disabled and migrant)	TBD as part of RAP	Under the Turkish Expropriation Law, no compensation is required for loss of income of either formal or informal employees of the affected businesses.	<p>1)Financial Support Package to Employees: The SPV will provide a Financial Support Packages to eligible employees for a fixed period to be determined in the RAP, as needed. The content of the packages and delivery conditions will be determined as part of the RAP.</p> <p>2)Special support and/or assistance to vulnerable employees (on a case-by-case basis): Special measures/assistance to be provided to vulnerable employees and employees who have vulnerable members in their households will be identified by the SPV and assistance/measures will be developed and delivered by the SPV on a case-by-case basis.</p>
(iv) Vulnerable People					
(iv)1	Affected households with vulnerable members – may be exposed to any of the losses or impacts identified for the above PAP categories, but at a more significant level due to vulnerability or disadvantaged conditions.	All households that are physically and economically displaced and include vulnerable members Please see Chapter 12 for vulnerability categories.		Under the Turkish Expropriation Law, no specific compensation or assistance is required for vulnerable people.	<p>1)In-kind support will be provided by the SPV to the vulnerable households from the Vulnerable Groups Fund to be provided under the RAP Fund. Vulnerability level of each household will be determined by the SPV based on the vulnerability scoring approach to be defined in the RAP.</p> <p>Households to be provided with support and the level of support (according to vulnerability scoring assessment) will be further determined (depending on their vulnerability levels) by the SPV, with support from third-party implementation partners and consultants, during RAP implementation.</p> <p>2)Support and/or assistance tailored to the needs of households with vulnerable members (on a case-by-case basis): The SPV, through the expropriation team, CLOs and other in-house personnel as appropriate, will provide support to vulnerable households tailored to their needs (different needs of illiterate, elderly, single women, disabled, low-income individuals among others). This will include individualised communication and information provision, communication and information, logistical support, support for reviewing and processing official documents relevant to expropriation, completion of official procedures at the title deed offices or relevant to inheritance and succession, registration, enrolment at new resettlement sites, etc.</p> <p>3)Livelihood Restoration, Improvement and Assistance: Physically and economically displaced households with vulnerable members will be entitled and given priority to accessing all livelihood restoration, improvement and assistance measures specified in this RPF and subsequent RAP.</p> <p>As one of the measures under LRP, at least one member of the physically or economically displaced households having vulnerabilities, who is looking for a job and meets Project's employment criteria (e.g. education, skills, H&S considerations, etc.) will be given priority in Project employment during construction phase.</p>
(v) Temporary Losses/Impacts During Construction					
(v)1	Temporary loss of private parcels during construction	Owners/ shareholders	TBD as part of RAP	Temporary facility sites that will continue to serve the Project during the operation phase are expropriated by KGM in accordance with the Expropriation Law. For facilities to be used solely during the construction phase, KGM requires the SPV/EPC to complete land acquisition through rental agreements, mutual protocols, or similar arrangements with the owners or shareholders.	<p>1)Cash Compensation at Full Replacement Value: Protocols and/or rental agreements will be executed by the SPV/EPC with the owners/right holders of the lands to be used temporarily during the construction phase.</p> <p>Cash compensation for the use of land and any economic activity (cost of crops, trees, non-residential structures, infrastructure etc. at market prices) will be provided by the SPV to owners/right holders accordingly.</p>

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	(including access restrictions)				<p>2) Moving Assistance and/or Allowance: In case the non-residential structures are movable and if requested by the owners, the SPV will provide assistance for moving them to replacement land or another location to be decided by the PAP.</p> <p>3) Construction-related Measures: The SPV will ensure that all construction and work sites temporarily used during the construction phase are rehabilitated upon completion of activities at each site, in accordance with the Project ESIA.</p> <p>During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner.</p> <p>4) Monitoring, Grievance Management and Corrective Measures: The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to temporary land loss and access restrictions arising from construction phase impacts.</p>
		Formal (tenants) and informal users	TBD as part of RAP	<p>No compensation for land is provided to <u>formal</u> users for temporary land use by the Project.</p> <p>However, <u>formal tenants</u> are eligible for compensation for crops, trees and any assets and fixed improvements/ investments (structures) on the rented land on the condition that they can prove ownership for these crops/assets and fixed improvements/ investments. Depreciation is deducted in line with the depreciation ratios published in the relevant Turkish legislation.</p>	<p>PAPs are eligible for all entitlements defined for the <u>formal users</u> (formal tenants) under “Permanent loss of private parcels” (please see above).</p> <p>The user will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8.</p> <p>During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner.</p>
(v)2	Temporary loss of state-owned parcels during construction	Owners (Governmental institutions)	TBD as part of RAP	<p>Treasury lands and non-registered parcels are allocated to the Project upon KGM's application, without any payment.</p> <p>Cash compensation is provided by KGM to legal entities in accordance with established protocols, and the respective parcels are subsequently transferred to KGM.</p>	-
	(including access restrictions)	Formal users (formal tenants)		<p>Land designated for temporary use is allocated without undergoing expropriation procedures.</p>	<p>PAPs are eligible for all entitlements defined for the <u>formal and informal users</u> under “(i)6 – Permanent loss of state-owned parcels”</p> <p>During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the relevant institutions.</p>
(v)3	Non-land related impacts due to construction	Owners and formal/informal users of lands and assets – as applicable	TBD on a case-by-case basis	-	<p>1) Construction-related Measures: The SPV will ensure that construction-related environmental measures are implemented to avoid, minimise and/pr rectify impact on water resources, air emissions, vibration, etc. in line with the Project ESIA. The SPV will commission baseline surveys of existing building structures and integrity at receptors close to the blasting sites should be undertaken so that impacts and any damage arising from blasting activities can be identified during the periodic monitoring. The SPV will ensure that the construction and works sites temporarily used during construction are rehabilitated upon completion of construction activities at each site in line with the Project ESIA.</p> <p>2) Monitoring, Grievance Management and Corrective Measures: The SPV will ensure that any claims regarding property damage are investigated and assessed by third-party experts. Cash compensation will be provided to affected persons for all validated claims. Contractor and subcontractor liabilities will be clearly defined in their respective agreements. The SPV will ensure that E&S impacts are monitored as outlined in the Project ESIA and will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase.</p> <p>3) If livelihood loss is verified, all livelihood costs will be compensated by the EPC Contractor in line with this RPF and subsequent RAP requirements.</p>
(v)4	Temporary interruption/ disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any	TBD on a case-by-case basis	-	<p>1) Construction-related Measures: The SPV will ensure coordination with relevant authorities and institutions and will take all necessary on-site measures to minimise the duration and impact of temporary service interruptions or disturbances affecting beneficiaries.</p> <p>2) Monitoring, Grievance Management and Corrective Measures The SPV – CLOs will inform service beneficiaries in advance about the schedule and nature of any interruptions and will update them on the Project Grievance Mechanism prior to the start of the interruption. The SPV will ensure and monitor the immediate reinstatement of affected infrastructure and services upon completion of the relevant construction, displacement, or related works. The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase.</p> <p>Any damage to services or infrastructure will be reinstated by the EPC Contractor.</p>

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(vi) Impacts During Operation					
(vi)1	Operation phase E&S impacts (e.g. operation phase noise, vibration, air quality, community health and safety)	Residential structures/houses that cannot be mitigated to levels compliant with Project standards through operation phase E&S management plans	TBD during operation phase E&S monitoring, if any	-	<p>1)<u>Operation Phase E&S Measures</u>: The SPV will ensure that measures are implemented in line with Project ESIA and subject-specific management plans and procedures.</p> <p>2)<u>Monitoring, Grievance Management and Corrective Measures</u>: Construction and operation phase impacts on these houses, including potential loss of property value, noise, vibration, and effects on household livelihoods, will be identified through periodic E&S monitoring and stakeholder consultations during the operation phase of the Project. These impacts will be managed through the Project's grievance mechanism.</p>

(*) Major structures include fixed investments/infrastructure such as barns, sheds, depots, pools, immovable parts of the irrigation and drainage systems, etc., as depreciation of such structures are considerable.

8. Livelihood Restoration and Improvement

According to IFC PS5, “the term **“livelihood”** refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering”.

IFC’s Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) defines **livelihood restoration** as “the process of restoring (or improving) affected persons’ livelihoods to preproject levels (or better)”.

Within the context of the Project, livelihood restoration is required for the following categories of PAPs:

- **Users of affected lands (formal and informal) for income generation:** This includes physically or economically displaced individuals, where land used for income generation is lost or access is restricted. The users may include owners, shareholders, formal tenants, sharecroppers or informal users of affected private or public lands, such as farmers, households engaged in animal husbandry, beekeeping, forestry activities, fishing, etc.
- **Business owners and employees (formal and informal), if any,** who experience loss of income or employment as a result of Project’ impacts

To support the planning of livelihood restoration, improvement, and assistance measures, consultations will be conducted with the following stakeholders as part of RAP surveys:

- **District Directorates of Agriculture and Forestry** in affected districts
- **Mukhtars** of affected settlements
- **Agricultural land users** in affected settlements – both formal and informal users of affected private and public lands including **vulnerable** farmers and households with vulnerable members
- **Households engaged in animal husbandry, beekeeping, fishing, or similar economic activities** in affected settlements – using the lands affected by the Project
- **Owners of affected businesses (employers)** in the affected settlements

According to IFC PS5 (paragraph 18, footnote 20), “Where a project results in both physical and economic displacement, the requirements of paragraphs 25 and 26 (Economic Displacement) should be incorporated into the Resettlement Action Plan or Framework (i.e., there is no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan)”.

In line with this guidance, the **livelihood restoration, improvement, and assistance measures addressing the economic displacement impacts of the Project will be developed and incorporated into the subsequent RAP** to be developed and Livelihood Restoration Improvement and Assistance Packages for different impact categories will be defined based on the findings of the RAP surveys.

The packages for affected people may include, but will not be limited to, the following – to be designed based on the RAP surveys to be undertaken with the affected people, and with contributions from qualified agricultural experts and implementation partners. The example packages and programmes implemented by ÇOK A.Ş. in the MC Section, as well as the outcomes regarding their level of success, will provide useful insights for developing the specific LRP packages and programmes under the subsequent RAP.

Table 8-1 below provides a summary of example packages and programmes that will be taken into consideration when designing the household-specific LRP packages and programme under the RAP.

Table 8-1. Example Packages and Programmes

Example Packages or Programs	Examples Implemented by ÇOK A.Ş. in Malkara – Çanakkale Section
<p>Training programs (in collaboration with relevant District Directorate of Agriculture and Forestry and third-party implementation partners)</p>	<ul style="list-style-type: none"> - Agricultural training: <ul style="list-style-type: none"> o Pest Control and Management o Fruit Cultivation o Vegetable Cultivation (including trials, plantings) o Fodder Crop Cultivation o Beekeeping - Skill development training
<p>Household-level support packages to be developed based on needs and analysis during RAP implementation</p>	<ul style="list-style-type: none"> - Distribution of agricultural input materials: <ul style="list-style-type: none"> o Seed support o Sapling support o Ryegrass seed o Beekeeping input support o Machinery, equipment and material support
<p>Priority in Project employment</p>	<ul style="list-style-type: none"> - Physically displaced households - Households exposed to significant economic displacement land acquisition impacts (e.g. when land taken constitutes more than 20 percent of the total productive area of a household, significant cumulative impacts) - Affected households with vulnerable members
<p>Support packages for affected businesses</p>	<ul style="list-style-type: none"> - Supports under Business Relocation Support Package - Business-specific training (e.g. job-specific, e-commerce, marketing, financial, etc.) - Certification and accreditation support
<p>Community-level support programmes that would supplement household-level support packages</p>	<ul style="list-style-type: none"> - Agricultural machinery, equipment and material support - Construction and repair support for infrastructure and areas supporting livelihood activities (agricultural, animal husbandry) of the communities including affected people - Capacity building support for local cooperatives - Support to local women's organisations and initiatives - Pasture improvement - Afforestation using high-value tree species that yield economic products - Support for establishment of local product markets

As the RAP Implementation progresses, consultations of the SPV with the affected people will continue on ongoing basis and livelihood restoration and improvement measures will be updated as required with input from ongoing consultations with affected households, related authorities and other relevant third parties (e.g. universities, professional organisations, etc.) to be collaborated as necessary.

During the design of household-specific livelihood restoration packages under RAP implementation, the exit strategy for discontinuing support measures will be clearly defined. This will ensure that all activities are planned with an explicit timeline and that all communication with PAPs reflects the perspective of an eventual exit. The SPV – RAP Implementation Team, supported by implementation partners, will inform PAPs from the outset that RAP support is temporary and is intended to conclude within the RAP implementation period of 36 months following the signing of the finance agreement.

9. Resettlement Sites

The resettlement sites may be urban (district or city centres) or rural depending on the preferences of each affected household. Relocation to urban areas may force affected people into wage labour and disrupt their agrarian way of life. The current Turkish expropriation laws do not allow for land-for-land compensation in most cases, despite the existence of a 'barter' clause, which remains largely unused in practice due to land scarcity or high land value. Therefore, the options for resettlement will be as follows:

- Urban **resettlement** (for example in district centres):
 - **Moving** into second homes owned by affected households
 - **Purchasing** or renting a new house from the market, subject to market availability
- Rural resettlement:
 - Moving into **second** homes owned by affected households
 - Purchasing or **renting** a new house from the market
 - Constructing a new house on an alternative land owned by the affected households or land to be allocated by the relevant authorities, if feasible

Following the approval of the RAP – to be prepared subsequent to this RPF – by the Lenders, the SPV – RAP Implementation Team will start providing proactive support to affected people to help them finalise and execute relocation plans.

10. Stakeholder Engagement and Information Disclosure

10.1. Previous Engagement and Information Disclosure

10.1.1. Expropriation Process

The expropriation process conducted by the KGM in accordance with the Expropriation Law of Türkiye includes mechanisms for information disclosure and consultation with people affected by Project-related land acquisition, as summarised below:

- **Publication of Accelerated Expropriation Decisions:**

In Türkiye, accelerated expropriation decisions are disclosed to affected communities and the broader public through publication in the Official Gazette of Türkiye.

For this Project, the accelerated expropriation decision issued by the Presidency on 12 April 2023 was published in the Official Gazette on **13 April 2023**.

The decision included a general schematic of the Motorway alignment and a list of all neighbourhoods covered under the scope of the decision. As a result, the settlements subject to expropriation became publicly known.

- **Information of Owners and Land Users during Asset Inventory and Valuation:**

Mukhtars of the affected settlements and the affected communities, including people affected by Project-related land acquisition, are informed about the expropriation and related procedures **during the on-site identification and inventory of assets studies conducted by the appointed valuation contractor**. These engagements serve as a key point of contact for information dissemination and clarification of the Project's land acquisition impacts, particularly regarding the expropriation boundaries.

- **Information of Owners through Official (Article 8) Notifications sent by KGM to Owners and Shareholders of Affected Assets**

In line with the Expropriation Law, Article 8 notifications are dispatched by the KGM via registered returned mail to all owners and shareholders of the affected assets. This includes the legal heirs of deceased owners.

These official letters contain detailed information on the following:

- Date, time, and location of negotiation meetings
- Procedure to be followed in case of agreement (including title deed transfer and payment of the expropriation fee)
- Legal procedure to be followed by KGM in case of disagreement
- A list of documents that affected persons must bring to the meetings and tasks they must complete to finalise the negotiation and agreement process. This includes, but is not limited to, documentation on inheritance and succession.

- **Information of Owners during in-person Negotiation Meetings held as per Article 8**

The in-person negotiation meetings are conducted by KGM's Negotiation Commission at the settlement level, either within the settlement itself or at a nearby venue (such as local directorates of relevant governmental institutions) that is well known and easily accessible to the affected people.

Prior to the start of the negotiations on the meeting day, the Commission provides participants (the owners and shareholders of the affected assets) with the following information:

- General information about the Project and motorway construction works
- The Expropriation Law of Türkiye and the associated expropriation procedures
- How the expropriation value is determined for affected assets (lands, structures, trees, crops), with necessary clarifications and justifications related to valuation

- The rights of individuals whose property will be expropriated
- Expropriation procedures and works carried out up to the date of the meeting (such as field identification works, valuation, etc.), and
- Expropriation procedures to follow after the meeting, in case of agreement and disagreement

Following the general information sessions, in-person engagement and negotiations are conducted. The outcomes of these negotiations – whether agreement or disagreement – are documented by KGM using relevant records, such as agreement memorandums signed by the KGM’s negotiation commission members and respective owner in case of agreement.

Information on the Article 8 negotiation meetings held to date will be provided in the subsequent RAP.

- **Informing Relevant Institutions and Legal Entities through Official Correspondence**

KGM informs relevant institutions and legal entities through official correspondence about the Project route. This communication also aims to identify any existing or planned infrastructure facilities – such as energy transmission lines, drinking water systems, wastewater and stormwater infrastructure, and natural gas pipelines – that may overlap with the Project and therefore need to be displaced.

Where applicable, KGM also requests consent for activities to be undertaken on parcels under the ownership or control of these entities.

Information on the official correspondence carried out with the relevant institutions and legal entities to date will be presented in the subsequent RAP.

10.1.2. Engagement between the SPV and KGM

The Senior Management of the SPV regularly engages with the General Directorate of KGM on various project management aspects, including the land acquisition process, RAP study, alignment with applicable international standards, as well as subjects related to the Project programme, design, permitting, construction, and Project governance.

The SPV maintains close engagement with the KGM’s Public – Private Partnership Regional Directorate (KÖSOB – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*), particularly for coordinating ongoing design and construction activities, as well as managing and monitoring the progress of land acquisition and permitting works.

During the RAP preparation, the SPV will continue its engagement with the KGM Directorate General and KÖSOB to inform these authorities about the RAP study – where needed with support from the RAP Consultant – and to obtain their input and, where applicable, feedback on the RAP documentation and its implementation. Details of this engagement will be presented in the RAP.

10.2. Engagement and Information Disclosure as part of ESIA and RAP Processes

In line with the international standards and potential Lenders' E&S risk classification approaches, the Project has been classified as a "Category A" activity. Accordingly, separate from this RPF, an Environmental and Social Impact Assessment (ESIA) Package has been prepared by the ESIA Consultant.

The ESIA package comprises the following components:

- ESIA Report (March 2025)
- Stakeholder Engagement Plan (SEP) (March 2025)
- Non-Technical Summary (NTS) (March 2025)

The required components of the ESIA Package **were disclosed in both Turkish and English on the Project website**⁵².

This disclosure aims to inform stakeholders about the Project's activities, impact assessment findings, planned mitigation and monitoring measures, and to gather public feedback on the Project and associated documentation.

Following finalisation and final approval by Lenders, this RPF, and subsequent RAP and GLAC, will also be disclosed on the Project website.

The **hard copies** (in Turkish) of this RPF and GLAC will be made available at the following locations during the Disclosure Period.

- Project's Construction Camp Sites
- Offices of the settlement heads (mukhtars)

Any feedback received from the stakeholders will be reviewed by the SPV and the RAP Consultant and, where appropriate, incorporated into the final version of the RAP.

10.3. Guide to Land Acquisition and Compensation (GLAC)

A **GLAC**, providing a concise, clear, and non-technical summary of the RAP, will be prepared by the SPV following the completion of draft RAP.

Once finalised and approved by the Lenders and the LESA, the **GLAC will be distributed to the mukhtars and affected people** in affected communities to enhance their understanding of the process and to support effective RAP implementation.

10.4. RAP Disclosure and Engagement Action Plan

A **RAP Disclosure and Engagement Action Plan**, outlining specific stakeholder engagement activities to be conducted by the SPV, with KGM, KÖSOB, mukhtars, affected people, and other external stakeholders as necessary, during the **RAP disclosure and implementation phases** – will be prepared as part of the RAP to be developed following this RPF.

This plan will be in tabular format including the following information and be **updated** as necessary throughout the RAP implementation phase:

- Stakeholder category
- Purpose of engagement
- Documents and materials to be used for engagement
- Engagement method
- Location
- Responsible party
- Timetable for implementation

⁵² <https://www.1915canakkale.com/en-us/sustainability/kinali-malkara-section/environmental-and-social-impact-assessment>

11. Grievance Management Mechanisms

The Stakeholder Engagement Plan (SEP) for the Project, including the public grievance mechanism, has been developed as part of the ESIA Package, in accordance with international requirements. Consistent with this Project-specific grievance mechanism defined under the SEP, procedures will be established and implemented for managing **grievances specifically resulting from land acquisition, resettlement, and livelihood restoration** during the RAP preparation and implementation phases.

KGM, as the designated authority for expropriation, collects and manages grievances, objections, and feedback (e.g., requests, suggestions) related to land acquisition. If such land acquisition-related grievances or feedback are collected or received by the SPV through the implementation of the Project SEP, the SPV will convey them to KGM in writing. Furthermore, the SPV will consolidate all land acquisition-related complaints – collected by the SPV, the EPC Contractor (including subcontractors), KGM, and other relevant authorities – into a master complaints tracker.

Land-acquisition related grievances and feedback of public that require action by the SPV will be handled by the SPV in accordance with the Project-specific grievance mechanism. This mechanism will be accessible to affected parties, including communities, owners, and formal and informal users of the affected lands and assets, and/or people whose livelihoods may be affected by the Project.

The SPV will collaborate with the EPC Contractor for the collection, registration, and management/resolution of construction-related grievances (e.g., damages to crops and assets, spillages onto neighbouring parcels), as described in Section 11.3.

For the management of employee grievances in the Project, the SPV has an **Employment Policy Document** (May 2025) in place for the KM Section, which includes a Workers' Grievance Procedure.

11.1. Project-specific Grievance Mechanism

The Project-specific Grievance Mechanism is defined under Project's SEP. Key principles for addressing grievances resulting from land acquisition, resettlement, and livelihood restoration – aligned with IFC PS5 – will be as follows:

- designed to specifically address grievances resulting from land acquisition, resettlement, and livelihood restoration;
- use culturally appropriate methods taking into account specific cultural and traditional mechanisms for raising and resolving grievances;
- scaled to the risks and adverse impacts of the Project and have communities and people affected by Project-related land acquisition as its primary user and stage of the Project and land-acquisition process;
- accessible with clear communication and ease of use for all affected people including vulnerable individuals;
- seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern;
- does not impede access to judicial or administrative remedies.

The SPV will inform the settlement heads and affected people in settlements affected by the Project-related land acquisition about the mechanisms available to them as well as the contact details of the Project.

Grievances raised by external government agencies, legal entities or other institutional stakeholders – will also be addressed through this mechanism.

During implementation of the mechanism, the SPV will:

- ensure that all complaints are taken seriously and treated fairly;
- encourage use of the GM and provide assurance that there will be no retribution for participation;
- ensure protection of the identity of complainants
- communicate the rights of stakeholders to use remedies such as external mechanisms, third parties, or the judicial system.
- In the case of allegations of gender-based violence, sexual exploitation, and abuse, the SPV will ensure all allegations are treated ethically by trained members of the Grievance Committee and in line with a survivor-centred approach.

[Grievance Committee for Managing Land Acquisition and Resettlement related Grievances](#)

A Project-level Grievance Committee for grievances resulting from land acquisition, resettlement, and livelihood restoration will be set-up during RAP implementation for effective implementation of the grievance management procedures and monitoring of actions. The members of this Committee, as well as its working principles, will be detailed in the RAP.

[RAP Grievance Database](#)

The SPV will establish a **dedicated RAP Grievance Database** to consolidate all land acquisition-related complaints – whether received by the SPV, the EPC Contractor (including subcontractors), KGM, or other relevant authorities – into a master complaints tracker.

Any grievance or feedback – whether verbal or written – submitted through these various channels will be recorded by the SPV's RAP Implementation Team – with support from EPC teams – in this dedicated database.

For this purpose, the SPV will collaborate with KGM on a monthly basis as part of periodic Project coordination meetings, collect the grievances received by KGM regarding the Project's land acquisition process, and incorporate the information into the Project's Grievance Database. Mechanisms for management of grievances collected by KGM that require action by KGM or SPV will be outlined in the RAP, as indicated in Section 11.2.

[Personal Data Protection](#)

The data recorded and processed in the RAP Grievance Database will be managed in compliance with the requirements of the Law on the Protection of Personal Data (Law No. 6698, 2016).

The mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

[Grievance and Feedback Collection Channels](#)

The grievance and feedback collection channels to be used will aligned with the Project SEP, as summarized in Table 11-1 and will be detailed in the RAP.

The public will be informed about these channels through announcements posted on information boards to be placed in mukhtars' offices, local coffee houses, mosques, where available women's community centres, and other public areas, as appropriate.

Table 11-1. Channels for Collecting Complaints and Feedback

Channel	Explanation
Project website	Project website https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi
E-mail	info@1915canakkale.com
Mail or In-person Application –	Main Office: Metropol İstanbul Sitesi, A Blok, Daire 14, Ataşehir, İstanbul Site Office: Main Construction Camp Site (KM 60+000)
CLOs	CLOs will be the primary focal points for collecting and registering grievances and feedback – whether verbal or written – received during public and individual meetings, as well as via phone calls, emails, correspondence, etc. CLOs will ensure responses are provided to the grievance/feedback holders within the defined timeframes. Where necessary, CLOs will assist stakeholders in completing grievance and feedback forms.
Phone – CLOs	TBD
Grievance boxes and forms	Grievance and feedback boxes, along with corresponding grievance forms (as included in the Project SEP), will be installed and regularly maintained by the SPV – CLOs in all affected settlements and at relevant project work sites. These will be located at one or more of the following locations, as appropriate: - Project construction camp sites - Project temporary facility sites - Muktar offices - Local coffeehouses - Areas where women commonly gather and/or locations that women would feel comfortable visiting Grievance and feedback forms will also be available on mobile Project vehicles. This includes vehicles of SPV – CLOs and social staff, HSE staff, and other community-facing managers and directors working at Project sites.
Social media platforms	TBD
Other community-facing Project representatives – including directors, managers, and personnel of the EPC Contractor and its subcontractors	SPV – CLOs will establish systematic procedures and maintain daily engagement with relevant subcontractors to ensure that all grievances and feedback – whether verbal or written – collected by subcontractor personnel are promptly conveyed to the appropriate SPV and EPC representatives. These grievances and feedback items will be recorded by the SPV – CLOs in the RAP Grievance Database and managed in accordance with the Project-specific Grievance Mechanism for the RAP. SPV – CLOs will provide training to other community-facing representatives of the Project, including directors and managers from both the SPV, EPC and subcontractors, to ensure consistent and effective implementation of the Project Grievance Mechanism.
Personal visits by stakeholders to the Project sites – such as construction camp sites, temporary facility sites, etc.	The SPV – CLOs will assist visitors to the Project construction camp and other temporary work sites in completing grievance and feedback forms, whenever possible. If verbal feedback and/or grievances are received during stakeholder visits, the SPV and SPV CLOs – whichever party receives them – will ensure these are duly recorded and addressed in accordance with the Project Grievance Mechanism.
Through Directorate General of Highways (KGM) in Ankara	Stakeholders may submit grievances and feedback regarding the Project directly to KGM through KGM's online grievance system: https://vatandas.kgm.gov.tr/Complaint/Personal?_gl=1*1o6xoq*_ga*MTA4MjcyMTY2My4xNzQ3NjMzNDMz*_ga_P1MD63L4M4*_czE3NDgwNzk5NDMkbzZkZzAkDDE3NDgwNzk5NDMkajYwJGwwJGgxMDc2NjUzOTcxJGRVQnBtMnZCVDFEd0FHQ1pWY3ViRWInRUZOY3IIV19JOH RB KGM will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV. These grievances and feedback items will be recorded by the SPV – CLOs in the RAP Grievance Database and managed in accordance with the Project-specific Grievance Mechanism for the RAP.

Channel	Explanation
Through KÖSOB	<p>Stakeholders may submit grievances and feedback regarding the Project directly to KGM's KÖSOB:</p> <p>Mail or in-person application: Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Armutköy Mah. Nil Cad. No:22, 16180 Osmangazi, Bursa, Türkiye Phone: +90 224 - 275 78 00 (50 Hat) +90 286 502 00 12 Fax: +90 224 – 267 09 45 E-mail: kosob@kgm.gov.tr</p> <p>KÖSOB will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV.</p> <p>These grievances and feedback items will be recorded by the SPV – CLOs in the RAP Grievance Database and managed in accordance with the Project-specific Grievance Mechanism for the RAP.</p>
The Presidency's Communications Centre (CIMER)	<p>The Presidency's Communication Centre (CIMER) provides a centralized complaint system accessible to Turkish citizens, legal entities, and foreigners.</p> <p>It will serve as an alternative and widely recognised channel through which Project stakeholders can submit Project-related grievances and feedback directly to state authorities.</p> <p>CIMER Contact Information: Website: https://www.cimer.gov.tr/ Call Centre: 150 Phone: +90 312 525 55 55 Fax: +90 312 473 64 94 Mail: Addressed to the Republic of Türkiye, Directorate of Communications In-person applications: At community relations desks located in governorates, ministries, and district governorates</p> <p>Grievances and feedback received by KGM or the Project through CIMER will be recorded by the SPV – CLOs in the RAP Grievance Database and managed in accordance with the Project-specific Grievance Mechanism for the RAP.</p>
The Presidency's Communications Centre (YIMER)	<p>The Foreigners Communication Centre (YIMER) provides a centralised information and complaint system primarily for foreign nationals residing in Türkiye.</p> <p>It will serve as an alternative and well-recognised channel through which foreign resident Project stakeholders can submit Project-related grievances and feedback directly to state authorities.</p> <p>YIMER Contact Information: Website: https://yimer.gov.tr Call Centre: 157 (available 24/7 and supports multiple languages) Phone: +90 312 157 11 22 E-mail: info@yimer.gov.tr</p> <p>Grievances and feedback received by KGM or the Project through YIMER will be recorded by the SPV – CLOs in the RAP Grievance Database and managed in accordance with the Project-specific Grievance Mechanism for the RAP.</p>

The key steps of the grievance mechanism for external stakeholders are given in the **Project SEP**.

The grievance mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

Table 11-2. Key Steps of the Grievance Mechanism for Land-acquisition related Grievances

Key Steps	Description of the Activities/Tasks
Step 1 – Receive and register	<ul style="list-style-type: none"> Grievances and feedback from external stakeholders are collected through the communication channels listed in Table 11-1. Each grievance is recorded and classified by the designated SPV – CLOs in the RAP Grievance Database, maintained in both written and electronic formats specifically for external stakeholder grievances, in accordance with Project’s personal data protection policies. The stakeholder requests for the deletion of their personal data from any records or grievances, etc. will be addressed.
Step 2 – Acknowledge	<ul style="list-style-type: none"> Grievance is formally acknowledged through a personal meeting, phone call, or letter, as appropriate, within three (3) working days of receipt by the Project. If the grievance is not clearly understood, or if additional information is required, clarification will be sought by the SPV – CLOs from the complainant during this step.
Step 3 – Delegate	<ul style="list-style-type: none"> The designated SPV – CLOs delegates the grievance in writing to the relevant Project department, EPC Contractor, or designated personnel for the preparation of an appropriate response. The SPV – CLOs will assess the subject matter and determine the risk category of the grievance and the timeframe for completion of relevant actions. If necessary, the grievance may be escalated to Project or Corporate Senior Management for consideration. A response is developed by the SPV – CLOs or the relevant team associated with the grievance, with input other corporate or Project teams, and third-parties, as needed. At the request of the designated SPV – CLOs with approval from the SPV – E&S Manager, the Grievance Committee may be involved depending on the complexity of the grievance or when expert opinion on specific matters is required. Required actions are implemented by the designated Project personnel or teams to address the issue, and their completion is documented in the RAP Grievance Database. The response is then signed off by the SPV – CLOs. This sign-off may consist of either a signature in the database or any written correspondence (through petition, e-mail or message) with the complainant, which will be filed together with the grievance to confirm agreement.
Step 4 – Respond	<ul style="list-style-type: none"> The response is communicated by the SPV – CLOs to the affected party: For non-complex grievances that are straightforward and easy to resolve: within seven (7) working days of receipt by the Project. For more complex grievances – where additional stakeholders such as Corporate or Project Senior Management or the Grievance Committee are involved (as outlined in Step 3): within thirty (30) working days of receipt by the Project. The designated SPV – CLOs ensures that an appropriate method for communicating the response is agreed upon and implemented, following approval from Project Senior Management or the Grievance Committee, as applicable. The complainant’s response to the resolution is documented to determine whether the grievance can be closed or if further action is necessary. The designated SPV – CLOs will use appropriate communication channels – most likely a telephone call, through messaging or face-to-face meeting – to confirm that the complainant has understood and is satisfied with the response. The complainant’s response is recorded in the RAP Grievance Database, and ideally, both parties will sign off to confirm closure of the grievance.
Step 5 – Close	<ul style="list-style-type: none"> The grievance is closed with sign-off by the designated SPV – CLOs, who determines whether the matter has been adequately resolved or if further attention and action are required. If additional action is needed, the designated CLO will reassess the grievance and take appropriate steps. Once the CLO confirms that the grievance can be closed, he/she will sign off to formally approve closure – either in the RAP Grievance Database and/or through written communication. A Grievance Close-Out Form (as included in the Project SEP), signed by the designated CLO and including relevant attachments, will be provided to the complainant as proof that the grievance was properly addressed and resolved. Where appropriate, the signature of the complainant will also be requested on the Close-Out Form. If the actions taken are not satisfactory to the complainant, the SPV, in consultation with the Lenders, will consider and, if necessary, initiate a second-tier grievance management (Appeals Mechanism), as outlined in Section 11.4.

11.2. Collaboration with KGM for Land Acquisition Related Grievances

Potential grievances and feedback from communities related to land acquisition may include the following:

- Disagreement on inventory prepared by KGM
- Disagreement with compensation rates offered by KGM's Negotiation Commission in accordance with Article 853 (such cases of disagreement will be managed through court proceedings Article 27 and Article 10 court of Expropriation Law)
- Disagreement on resettlement package provided by the SPV (to be conveyed to the SPV)
- Physical displacement impacts and resettlement sites and request for avoidance or minimisation measures
- Economic displacement impacts and request for avoidance or minimisation measures
- Issues related to orphan or fragmented lands and request for expropriation of entire parcel
- Damage to crops during surveys and works
- Allegations of gender-based violence, sexual exploitation, and abuse associated with the land acquisition and compensation process

Mechanisms for management of grievances collected by KGM that require action by KGM or SPV will be outlined in the RAP.

11.3. Collaboration with EPC Contractor for Construction Related Grievances

The EPC Contractor will be contractually obliged to report to the SPV all grievances and feedback received in connection with construction activities. These may include issues such as:

- Damage to properties and crops
- Damage to local road
- Disruptions during displacement of existing infrastructure
- Dust, noise, and vibration
- Access restrictions
- Impact on water resources (such as water used for irrigation)

While the EPC Contractor will retain primary responsibility for managing and resolving such grievances, the SPV will carry out **monthly** reviews to ensure that the EPC Contractor's grievance management is consistent with the overarching Project Grievance Mechanism.

11.4. Appeals Mechanism

If a grievance is not resolved to the satisfaction of the complainant, the SPV – in consultation with the Lenders – will consider initiating a second-tier grievance management and appeal mechanism. The purpose of this mechanism will be to:

- Re-examine the responses provided to external stakeholders
- Attempt to resolve non-judicial disputes related to various Project matters
- Facilitate the resolution of grievances to the satisfaction of all parties involved

The appeals mechanism and the **Project-level Appeal Committee** to be established will be described in the RAP.

The existence of the appeal mechanism will not limit stakeholders' rights to pursue external remedies, including judicial or administrative actions, in accordance with the applicable laws and regulations of Türkiye.

In cases that require legal investigation or the involvement of other relevant authorities, the decision to engage the corporate legal team will be made by the SPV – Senior Management.

⁵³ In the case of an Article 27 process, the Land Seizure Value determined by the court is subject to review by the court experts, and the final Expropriation Value is subsequently established by the courts through the Article 10 procedure. This procedure is initiated by the KGM and carried out by the courts as an integral part of the Article 27 process, without requiring any request or application from affected people. The difference between the Land Seizure Value and the Expropriation Value is settled by KGM in accordance with the court's decision.

12. Vulnerable People

People who may experience vulnerable or at-risk status stemming from their race, color, sex, language, religion, political or other opinion, national or social origin, property, or birth. The IFC PS1 includes the following provisions regarding the disadvantaged and vulnerable individuals and groups:

“Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, and as part of the process of identifying risks and impacts, the client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. This disadvantaged or vulnerable status may stem from an individual’s or group’s race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.”

The RAP surveys will be designed to identify and assess the vulnerabilities of individuals within households or affected business, if any, that are physically and economically displaced.

Vulnerability Criteria relevant to the Project

The vulnerability criteria determined for the Project is summarised in Table 12-1. Relevance of this criteria to the people affected by Project’s land acquisition and the count of individuals within households or affected businesses with respective specific vulnerabilities will be determined in the RAP based on the findings of the RAP surveys (household level questionnaires) to be conducted. Accordingly, during the administration of household livelihood and physical displacement questionnaires as part of RAP surveys, specific vulnerabilities of household members will be identified based on each defined criterion.

Several individuals may experience multiple vulnerabilities – for example, an elderly person with both a physical disability and a chronic illness.

Table 12-1. Vulnerability Criteria Relevant to the Project for Economically and Physically Displaced Households

Criterion	Specific Vulnerabilities
Sex, gender	• Female head of household
	• Single man taking care of children
Children	• Children with special needs
	• Children of school age who do not attend school
Age	• Advance old age (over 75)
	• Elderly people (over 65) in need of care
Health	• Physically disabled
	• Mentally disabled/mental issues
	• People with chronic diseases (heart, diabetes, blood pressure, kidney)
	• People with other significant health issues (cancer, Alzheimer)
Literacy	• Illiterate persons
Economic	• Economically displaced households who reported losing more than 20 percent of their Total Productive Area
	• Low-income households (total income lower than applicable minimum wage ⁵⁴)
	• People with green card ⁵⁵ or receiving governmental aid

⁵⁴ The net minimum wage applicable in Türkiye for the period 1 January 2025 to 31 December 2025 is 22,104.67 TRY, while the gross minimum wage is 26,005.50 TRY.

⁵⁵ A health card is provided in accordance with the **National Regulation on the State Coverage of Healthcare Expenses for Citizens Who Cannot Afford to Pay and the Green Card System**. The **type and content** of the card are determined based on the provisions of this Regulation.

Criterion	Specific Vulnerabilities
	<ul style="list-style-type: none"> Household members employed without social security Unemployed household members actively seeking work Landless
Race, colour, birth, ethnicity; Language; Religion; Political or Other Opinion; National or Social Origin; Culture	<ul style="list-style-type: none"> Migrant households Migrant seasonal agricultural workers Vulnerable due to any other criteria such as race, colour, birth, ethnicity; language; religion; political or other opinion; national or social origin; culture
Dependence on unique natural resources	<ul style="list-style-type: none"> Dependent on water resources, Dependent on grazing lands Dependent on forest
Others	<ul style="list-style-type: none"> Owners/users affected impacted by past expropriations and cumulative land acquisition impacts (with multiple parcels affected by the Project)

As part of RAP, comprehensive **vulnerability matrices will be developed** to identify the individual and household-level vulnerabilities for the **physically and economically displaced households** to be included in the RAP survey sample. These matrices will form the basis of the Vulnerable PAPs Database of the Project.

A vulnerability scoring matrix will be developed as part of the RAP. The matrix will be designed to systematically assess the relative vulnerability of households by applying a scoring system to specific criteria.

For households with vulnerable members, case-specific in-kind assistance and measures, which will be designed through direct engagement with the affected households in consideration of their special needs, will be provided.

The following general support mechanisms will be offered to **physically and economically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

- **Enhanced Communication and Consultation:** Special attention will be given during information dissemination, consultation, negotiation, and post-resettlement monitoring. Customised methods and tools will be developed and implemented to address the specific needs of each vulnerable affected person, in accordance with the Project's SEP. The SPV – RAP Implementation Team will ensure that vulnerable individuals and groups are specifically informed about the land acquisition process, the RAP, and the grievance mechanism, and supported to understand and sign household agreements.
- **Assistance with Compensation Procedures:** Support will be offered to assist vulnerable affected people in tracking and/or accessing their compensation payments throughout the RAP implementation.
- **Institutional Access and Legal Assistance:** Vulnerable individuals will receive help accessing governmental institutions and legal services when needed. This may include logistical support, communication assistance, and help with preparing required official documents, completion of inheritance procedures, etc.
- **Support for Administrative Processes:** Illiterate individuals, the elderly, and others requiring support will be assisted in reviewing and processing documents related to expropriation and compensation.
- **Access to Government Programs:** Support will be provided to help vulnerable individuals access and apply to existing governmental support programs designed for people with special needs or disadvantages.
- **Employment Opportunities:** Priority will be given to one eligible and capable household member from vulnerable physically displaced households and economically displaced households who are significantly⁵⁶ affected by Project-related land acquisition for employment opportunities created by the Project, provided they meet the employment criteria.

⁵⁶ Economically displaced households who lose more than 20 percent of their Total Productive Area.

The following specific support mechanisms will be offered to **physically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

- **Modifications to Replacement Housing for Persons with Disabilities:** Replacement housing provided to or found by physically displaced households with members who have disabilities will be customised as needed to ensure accessibility, safety, and comfort. Modifications may include the installation of ramps, handrails, accessible bathroom facilities, or other design adaptations based on individual requirements identified during consultations.
- **Provision of Food Packages:** Low-income will be supported through the periodic distribution of food packages during relocation process, especially immediately following displacement or during the early phases of RAP implementation.
- **Access to Health Care Services:** The Project will facilitate access to essential health care services for vulnerable individuals, particularly the elderly, chronically ill, persons with disabilities, and those without regular access to medical facilities. This may include support in scheduling appointments, covering transport to health care providers, or connecting with available public health programs.
- **Access to a Nearby Garden Area:** Where feasible, the Project will support the allocation or development of accessible garden areas near resettlement sites or host communities. These areas will offer opportunities for small-scale gardening activities, supporting both food security and psychosocial well-being, particularly for elderly or economically disadvantaged individuals.
- **Opportunities for Project Employment:** Vulnerable individuals, or eligible members of vulnerable households, will be given priority consideration for employment opportunities generated by the Project. Employment will be contingent upon meeting relevant job requirements, and the RAP Implementation Team will assist in identifying suitable roles, supporting applications, and providing any necessary orientation or training.

For **vulnerable individuals**, the SPV – RAP Implementation Team will provide non-cash support mechanisms (e.g., logistical and administrative assistance) to elderly persons, persons with disabilities, women-headed households, and other vulnerable groups, ensuring that costs such as travel expenses are not incurred and borne by vulnerable individuals. To this end, site-based Project personnel will accompany individuals with specific vulnerabilities – for example, when going to the bank, following up on deposit transactions, or withdrawing compensation amounts deposited by KGM. Where necessary, the SPV will make payments directly on their behalf to avoid expenses from being borne by vulnerable individuals.

13. Monitoring

Monitoring as part of RAP implementation will aim to track the progress of RAP implementation; assess whether the outcomes align with RAP objectives and identify any obstacles to their achievement; and identify areas needing improvement and propose corrective actions for any deviations from RAP objectives.

Monitoring will be conducted both **internally** and **externally**, as outlined below:

- **Internal monitoring** of the RAP implementation will be conducted by the **SPV – RAP Implementation Team**, with support from third-party implementation partners and consultants to be contracted by the SPV, as necessary. This will look at resettlement progress and performance, as a component of the Project ESMS as mandated by IFC PS1.
- **External monitoring** will include (i) periodic monitoring by LESA as part of their post-financial close E&S monitoring covering IFC PS5, and (ii) RAP completion audit.

Further details on the internal and external monitoring components are provided in the following sections. The monitoring and reporting framework for RAP implementation, including monitoring indicators for internal monitoring, is presented in Table 13-1.

Based on the findings from internal and external monitoring activities, the RAP will be reviewed and updated as necessary, through addenda documents or change management reports.

The process to be followed in the event of potential additional expropriation works and change management are discussed in Section 3.6.5.

13.1. Internal (Self) RAP Monitoring

The internal (self) monitoring by the SPV – RAP Implementation Team will begin following the approval of RAP by Lenders. It will be conducted to assess ongoing activities and progress including the following objectives aligned with IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023):

- Actions and commitments defined in this RPF and subsequent RAP are implemented fully and delivered on time.
- RAP actions and compensation measures are effective in helping affected persons in restoring their homes and in sustaining/improving pre-project living standards.
- Complaints and grievances are being followed up with appropriate corrective actions and tracking of outcomes.
- PAPs are informed about Project's displacement impacts and mitigations and have a say in the design of mitigation measures.
- Vulnerable persons are tracked and assisted as necessary.
- Recurrent or systemic problems that require correction are identified and fixed.

Monitoring Indicators

The internal monitoring indicators for internal monitoring, aligned with IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) and tailored to the nature and scope of displacement impacts, is presented in Table 13-1. Some of the indicators will be used as **key performance indicators (KPIs)**, as identified in the last column of the table.

Monitoring Methods

The monitoring methods will include the following:

- Review of expropriation and RAP implementation data (expropriation tracker, grievance logs, compensation records, human resources records, financial records, etc.) compiled by various Project teams
- Review of RAP Grievance Database
- Consultations with the KGM and other Project stakeholders
- Surveys conducted over a stratified sample of affected households (such as physically and economically displaced households), and comparison of monitoring data with baseline conditions
- Surveys conducted with relocated businesses and their employees, if any, and comparison of monitoring data with baseline conditions

Monitoring Frequency

The internal monitoring frequency for specific indicators will be as follows:

- During RAP implementation: **Monthly, Quarterly or Yearly** (see Table 13-1)
- Post-implementation, until RAP Completion Audit: **Bi-annually for two years after the completion of RAP implementation period** – hence completion of all RAP actions.

Internal (Self) RAP Monitoring Reports

The SPV – RAP Implementation Team will prepare periodic **Internal (Self) RAP Monitoring Reports**, incorporating the findings of ongoing monitoring activities.

The reporting frequency will be as follows:

- During RAP implementation: **Quarterly**
- Post-implementation, until RAP Completion Audit: **Bi-annually**

The Corporate Senior Management representatives and SPV Senior Management will be provided with copies of the internal RAP Monitoring Reports.

Using the relevant monitoring indicators, the Internal RAP Monitoring Report will provide information on the following aspects for the respective reporting period:

- **Introduction**, including general information on the Project progress as well as any changes to the Project introduced during the reporting period;
- **Overview of land acquisition progress**, based on data from KGM on expropriated parcels and structures, status of agreement protocols (for shares and parcels), status of compensation payments by KGM, court cases (Article 27 and Article 8), status of title deed registry, expropriation decisions, etc.
- **Overview of RAP implementation progress**, detailing key activities carried out during the reporting period according to RAP entitlement matrix, including status of compensation payments by SPV from RAP fund, relocation of affected houses, businesses and other structures, resettlement sites, gender integration in RAP implementation, key observations, and any challenges encountered; etc.
- **Livelihood restoration and assistance activities**, including status of implemented measures; progress on livelihood/income restoration for economically displaced persons; evaluation of the adequacy and appropriateness of ongoing or planned livelihood support programs;
- **Stakeholder engagement and information disclosure**, detailing types of consultations, locations, and number of participants, photographic records, press/media coverage; key issues or concerns raised, along with responses and action plans;
- **Grievance management mechanism**, with an assessment of functionality of the grievance mechanism, including number and types of complaints received, separate tracking of grievances submitted by vulnerable or disadvantaged individuals/groups;
- **Vulnerable people**, including measures taken to protect affected vulnerable persons and groups, addressing of gender-specific vulnerabilities, etc.;
- **Capacity**, including staffing with composition of implementation team, services from third-party implementation partners and consultants, etc. summary of the adequacy, readiness, and competency of the human resources involved;
- **Budget**, with allocation and disbursement of RAP fund, in line with the RAP and implementation schedule;
- **Key findings** of the reporting period, including any non-conformities identified and proposed time-bound Corrective Action Plan.

Table 13-1. Framework of Internal and External RAP Monitoring

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implementation)	KPI?
A. Internal Monitoring				
Expropriation and Compensation				
1.	Overall spending by KGM from expropriation budget	Expropriation tracker	Monthly	Yes
2.	Number of agreement protocols signed with affected owners/shareholders, disaggregated by settlement and gender etc.	Expropriation tracker	Monthly	Yes
3.	Number of expropriated parcels and shares, disaggregated by settlement and registry type	Expropriation tracker	Monthly	Yes
4.	Number of court cases opened and concluded in this reporting period, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	Yes
5.	Number of ongoing court cases and trends over time, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	No
6.	New accelerated expropriation decision(s) issued for the Project	Official gazette	Monthly	No
7.	New expropriation decision(s) taken by KGM for the Project	Official correspondence	Monthly	No
8.	Difference between land seizure and final expropriation values determined by the courts through Article 27 and 10 processes	Expropriation tracker	Quarterly	No
9.	Average time for payment of compensation (after Article 8, Article 27 and Article 10)	Expropriation tracker	Monthly	Yes
10.	Has there been any valuation update to take account of value increases in lands, assets, trees and crops	Valuation report of KGM	Yearly	Yes
Construction				
11.	Number of public and private parcels entered by the Project, with their land take and permitting status	Construction progress report	Monthly	Yes
12.	Number and/or location of existing infrastructure displaced due to Project, with status of displacement works	Construction progress report	Monthly	No
13.	Are there any additional underpasses, overpasses or other engineering structures requested by the stakeholder and included in the Project (if any as required)?	Construction progress report	Monthly	No
RAP Compensation				
14.	Overall spending by SPV from RAP fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	Financial records	Monthly	Yes
15.	Number of households that received cash compensation from RAP Fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	RAP Database	Monthly	No
Capacity				
16.	Number of full-time and part-time staff under SPV's RAP Implementation Team and EPC Contractor's organisation	HR records	Quarterly	Yes
17.	Number of third-party consultants (and their staff, where applicable) dedicated to resettlement, compensation and livelihood restoration activities	Contractual records	Quarterly	No
18.	Number of vehicles, computers, GPS units, and other equipment, as applicable	Count	Quarterly	No
Physical Displacement – Affected Houses				
19.	Number of households relocated, with distribution by tenure, vulnerability, gender of household members	Through surveys	Monthly	Yes
20.	Number of replacement dwellings purchased, rented or construction commenced or completed (by owners, formal renters and informal users of affected houses)	Through surveys	Monthly	Yes
21.	Number of households moved into their replacement dwellings	Through surveys	Monthly	Yes
22.	Whether recipients of cash compensation were able to purchase similar properties	Through surveys	Quarterly	Yes
23.	Are relocated households satisfied with their replacement housing	Through surveys	Quarterly	No
24.	How was the received cash compensation used/invested?	Through surveys	Quarterly	No
25.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
26.	Are there construction and operation phase impacts such as loss of value, noise, etc. causing economic impacts on houses?	Through surveys	Quarterly	No
Economic Displacement – Affected Lands				
27.	Number of households replacing affected land and area of replacement land actually secured by affected households	Through surveys	Quarterly	Yes
28.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
29.	Number of households that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with	Through surveys	Quarterly	No

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implementation)	KPI?
	distribution by type of training (agriculture, business, etc.)			
30.	Are there economic losses or issues experienced by land users due to land fragmentation or other Project-related factors?	Through surveys	Quarterly	No
	Affected Businesses (if any)			
31.	Number of businesses relocated, with distribution by tenure, vulnerability	Through surveys	Monthly	Yes
32.	Have relocated businesses been successfully reestablished?	Through surveys	Quarterly	Yes
33.	Are there still any business interruptions faced by the relocated businesses?	Through surveys	Quarterly	Yes
34.	Are business incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
35.	Number of businesses that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with distribution by type of training (agriculture, business, etc.)	Through surveys	Quarterly	No
36.	Are there any businesses that ceased operations due to relocation?	Through surveys	Yearly	Yes
37.	Have business operators whose lands or structures were affected partially – but who did not require relocation – experienced any economic loss?	Through surveys	Yearly	No
38.	Are employees still employed in the relocated business?	Through surveys	Yearly	No
	Stakeholder Engagement and Grievance Management			
39.	Number of stakeholder engagement activities and affected people engaged with (number of attendees disaggregated by settlement and gender)	Stakeholder Engagement Log	Quarterly	Yes
40.	Average time for grievance processing	RAP Grievance Database	Monthly	Yes
41.	Number of open grievances (pending resolution since last reporting period), disaggregated by settlement, subject, gender and relevant Project party (KGM, SPV, EPC, etc.)	RAP Grievance Database	Monthly	Yes
42.	Number of grievances opened and closed and trends over time, disaggregated by settlement, subject, gender, and relevant Project party (KGM, SPV, EPC, etc.)	RAP Grievance Database	Monthly	No
43.	Number of gender-based violence and harassment related grievances linked to the land acquisition process	RAP Grievance Database	Monthly	Yes
44.	Number of land acquisition requests for orphan or fragmented lands received by KGM	KGM records	Quarterly	No
	Vulnerability			
45.	Number of vulnerable households assisted through RAP Fund, disaggregated by settlement and gender	Through surveys	Quarterly	Yes
46.	Have some households become vulnerable after land acquisition, are there cases of hardship or changed households circumstance?	Through surveys	Yearly	No
47.	Have some households previously identified as vulnerable improved their status?	Through surveys	Yearly	No
48.	Has special assistance been provided to vulnerable employees or employees with vulnerable household members?	Through surveys	Yearly	No
B.	External Monitoring			
B.1.	Periodic Independent E&S Monitoring by LESA, including PS5			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements including the Guidance Note on the Selection and Scope of Work for Lender's Independent E&S Consultants published by Equator Principles ⁵⁷		<u>During construction:</u> Quarterly <u>During operation:</u> Bi-annually or annually (to be decided by Lenders)	
B.2.	RAP Completion Audit (by Independent Resettlement Experts)			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements for RAP Completion Audit.		One-off – to be conducted two years after the completion of all RAP actions, including post-implementation monitoring.	

⁵⁷ https://equator-principles.com/app/uploads/PUBLIC-Guidance_Selection-and-SoW-for-IESCs.pdf

13.2. External RAP Monitoring

External monitoring will be carried out by LESA to independently assess performance and compliance with IFC PS5 and other applicable standards of Lenders. The external monitoring framework is presented in Table 13-1.

Beyond demonstrating compliance to Lenders and other stakeholders, external monitoring will serve as an independent assessment of the resettlement process's effectiveness – particularly in determining whether affected livelihoods have been restored or improved.

In accordance with the IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), external monitoring will include the following components:

- Periodic E&S monitoring by the LESA, including assessment of compliance with IFC PS5
- A RAP Completion Audit meant to confirm that commitments in the RAP have been met, particularly those pertaining to livelihood restoration.

13.2.1. LESA's Periodic E&S Monitoring

As part of its post-signing scope, the LESA will conduct periodic monitoring of the Project's E&S activities and impacts to ensure compliance with Lender standards and requirements, including IFC PS 5, and other applicable land acquisition and resettlement requirements set by the Lenders.

Monitoring will be conducted on a **quarterly** basis during the **construction** phase (i.e. the 36-month period following the signing of the finance agreement between the SPV and the Lenders), which will largely coincide with the RAP implementation period. During the operational phase – which partially overlaps with the post-implementation monitoring period and concludes with the RAP Completion Audit in the early years of operations – E&S monitoring by the LESA will be conducted either **bi-annually or annually**, as determined by the Lenders prior to signing.

The outcomes of each monitoring exercise by the LESA – including progress on land acquisition and an independent assessment of the Project's RAP implementation performance – will be documented in monitoring reports prepared by the LESA and submitted to both the Lenders and the SPV.

Periodic E&S monitoring by LESA will be in accordance with the Guidance Note on the Selection and Scope of Work for Lender's Independent E&S Consultants published by Equator Principles⁵⁸. In relation to PS5,

In accordance with the "Scope of Work Template for Post-Financial Close Monitoring" provided in Annex 5 of the EP Guidance Note, the following components will be covered under LESA's periodic E&S monitoring:

- *"Review of the Borrowers' Self-Monitoring Report" including "Overview of RAP Implementation Status"*
- *"During the period of RAP implementation, compliance will be evaluated during the site visit by: spot-check reviews of relevant agreements and other documentation for a small sample of individual PAPs; and interviews with selected Project Affected People (PAPs) complainants under the grievance mechanism and relevant local Authorities, Assemblies, Community Representatives, NGOs and any other independent third parties involved in monitoring of RAP implementation. Information will be sought from PAPs, grievant and the Authorities/Assemblies/Community Representatives on the community's perception of the RAP implementation process and feedback on any issues that could indicate non-compliance with the RAP"*
- *"Interim RAP Status Reviews: The LESA will review the RAP documentation for each construction section/area prior to commencement of work in that section/area. The review would be based on a high-level review of the summary RAP status and the RAP implementation database, followed by a sample-based review of the administrative records of agreements/payments for a small sample of PAPs. This review will be used to give an opinion on whether the administrative process for RAP implementation prior to land clearance has been addressed as per the requirements given in the RAP. In the case where such review coincides with a quarterly site visit, then the compliance process can include field-based interviews as described above"*

⁵⁸ https://equator-principles.com/app/uploads/PUBLIC-Guidance_Selection-and-SoW-for-IESCs.pdf

13.2.2. RAP Completion Audit

As required by IFC PS5, a **RAP Completion Audit** will be undertaken by **competent external independent resettlement experts**⁵⁹ once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods.

Timing

The completion audit will be conducted following the conclusion of the post-implementation RAP monitoring period – which extends **two years beyond the completion of the RAP implementation** – subject to the Lenders' approval. This timeline is intended to allow sufficient time for the sustainable restoration of livelihoods

Objectives

The completion audit will involve a more in-depth assessment than regular resettlement monitoring activities, including at a minimum:

- A review of all mitigation measures with respect to the physical and/or economic displacement implemented by the SPV,
- A comparison of implementation outcomes against agreed objectives,
- A conclusion as to whether the monitoring process can be ended, and
- Where necessary, a Corrective Action Plan listing outstanding actions necessary to met the objectives.

Key objectives of the audit will be to undertake the following:

- Assess the effectiveness of all measures to avoid and minimize displacement impacts by comparing final Project impacts on land and people against those anticipated in the RAP.
- Verify that all entitlements and commitments described in the RAP have been delivered and verify that delivery of compensation and livelihood-restoration measures was transparent, equitable, and prompt.
- Determine whether RAP measures have been effective in restoring or enhancing affected persons' living standards and livelihoods, including both men and women and vulnerable people.
- Check that resettlement-related grievances and court cases have been satisfactorily resolved (or that adequate provision has been made for their resolution in the near future).
- Check that gender barriers have been effectively challenged to ensure improved livelihood opportunities for women.
- Identify any corrective actions to achieve completion of RAP commitments and prepare a corrective plan if warranted.

Methodology

The methodology of the RAP Completion Audit to be conducted by external independent resettlement specialists will follow the relevant recommendations of IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023). It will draw on the data generated by ongoing internal monitoring by SPV and the findings of the LESA's periodic monitoring and external compliance reviews.

An indicative table of contents for RAP Completion Audit will be presented in the RAP.

⁵⁹ May be a resettlement specialist, specialist company or group of specialists that have not been previously involved with the Project that is being audited.

14. Roles and Responsibilities

This Chapter outlines the respective responsibilities of the public and private partners in relation to the implementation of the RAP and describes the KGM's Public – Private Partnership Regional Directorate (KÖSOB – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*), which supports effective implementation of the Project in accordance with national legislation and the Lenders' requirements related to the RAP:

- Split responsibilities of the KGM and SPV under **the BOT Contract**
- Responsibilities of KGM in accordance with the **Expropriation Law**
- Responsibilities of the SPV under this **RPF** and subsequent **RAP** to fulfil Lenders' requirements

The SPV will submit and present the RPF and RAP to KGM (in Turkish) following approval of the documents by the Lenders. The SPV will keep the Lenders informed about this process, provide relevant documentation on the communication and meetings, and share any verbal or written feedback received from KGM, if any. Any feedback from KGM on the RPF and RAP will be incorporated into the documents, as appropriate, in consultation with and subject to the approval of the Lenders.

KGM – through KÖSOB – has been supporting the SPV and the RAP Consultant Team with the provision of land acquisition data necessary for RPF preparation and will continue to support them with the timely and sufficient delivery of necessary data (e.g. land acquisition, grievance management, and organisational capacity, among others) for RAP preparation and implementation without any delay or restriction.

14.1. Responsibilities under BOT Contract

The land acquisition responsibilities of KGM, along with the contractual obligations of the SPV, are defined in the MoU signed for the KM Section and its annexes. The contractual responsibilities of the SPV and KGM will be presented in the RAP.

Accordingly, responsibility of KGM is limited to execution of expropriation in line with the Expropriation Law of Türkiye. As such, implementation of RAP measures including livelihood restoration, assistance to vulnerable people, compensation of informal users as well as stakeholder engagement and monitoring – including allocation and disbursement of the budget required for RAP implementation (RAP Fund) **will be the responsibility of the SPV – in agreement with KGM.**

The detailed responsibilities of the KGM, as the **Contracting Authority**, and the SPV, as the **Appointed Company** are further elaborated in the subsequent sections of this Chapter.

14.2. Contracting Authority – KGM

The contracting authority of the Project – MoTI represented by the KGM – is responsible for executing Project-related land acquisition and expropriation in accordance with the Expropriation Law of Türkiye. For this Project, the land acquisition process carried out by KGM under the Expropriation Law includes the following:

- **Expropriation of privately-owned parcels.**
- **Allocation of state-owned parcels** including treasury lands, forestry lands, non-registered lands as well as lands owned by legal entities – for permanent or temporary use by the Project during the construction period.
- **Coordination of the identification process** for affected infrastructure and above-ground facilities belonging to other institutions that overlap with the Project, and execution of official correspondence with the relevant institutions – with the SPV responsible for any required follow-up correspondence or communication.

Expropriation procedures at the KGM are administered centrally by the **Department of Immovables** at the **General Directorate** level, and locally by the **Immovables Chief Engineering Units** situated within each **Regional Directorate**. These regional units operate under the authority and oversight of the central Department of Immovables.

As per the Expropriation Law, the KGM holds several key responsibilities regarding the expropriation of privately-owned parcels. These responsibilities include, but are not limited to, the following:

- **Approval of Expropriation Plans:** KGM is responsible for approving expropriation plans prepared by the national engineering firm (valuation contractor) appointed by the SPV. These plans include a comprehensive inventory of assets along the Motorway's expropriation corridor and identify the corresponding legal owners and shareholders.
- **Valuation of Immovable Assets:** KGM ensures the valuation of immovable assets is conducted in accordance with the Valuation Methodology (Section 6.3).
- **Notification and Invitation to Negotiations:** KGM formally notifies the identified owners and shareholders (including rightful heirs) and invites them to participate in negotiations regarding the expropriation through Article 8 notifications.
- **Conducting Negotiations:** Through a Negotiation Commission established by KGM under Article 8, the agency undertakes negotiations with the owners and shareholders participating in the negotiation meetings.
- **Documentation and Legal Proceedings:** KGM documents both agreements (through **agreement** protocols) and no agreement cases (maybe due to disagreement, waiver ("*imtina*") or non-attendance cases) with affected people. In cases of no agreement, the agency initiates court proceedings pursuant to Article 27 and 10 of the Expropriation Law. In the presence of an Article 27 accelerated expropriation decision issued by the President, as with this Project, KGM files a court case for land seizure under the provisions of Article 27 (Accelerated Expropriation).
- **Finalising Land Registry and Payment:** KGM oversees the completion of land registration processes and ensures payment of the determined expropriation value to the owners and shareholders. The registered title is transferred to KGM.
- **Requesting Parcel Evacuation:** KGM formally requests the evacuation of expropriated parcels from the relevant authorities once the expropriation is complete.

The key responsibilities of the relevant KGM departments will be presented in the RAP.

14.3. SPV – RAP Implementation Team

Land acquisition in accordance with the Expropriation Law is the responsibility of KGM. On the other hand, the SPV holds contractual responsibilities for covering a portion of the Expropriation Cost, and acquiring land use rights and permits for temporary or permanent facility sites, where such sites are located outside the Project’s expropriation corridor.

The SPV is responsible for implementing this RPF and the subsequent RAP in collaboration with KGM. In consultation and agreement with KGM, the SPV will lead the implementation of RAP measures, including livelihood restoration, support to vulnerable groups, compensation for informal users, stakeholder engagement and consultation, monitoring and reporting of RAP implementation progress, and budget (RAP Fund) allocation and disbursement for RAP-related activities (as detailed in Chapter 16).

The SPV will allocate and manage a RAP Fund to finance the costs associated with the implementation of RAP measures that are not covered under national legislation, as well as to provide for the human resources required to ensure effective implementation.

RAP Implementation Team

In accordance with the **Project’s E&S Resourcing Plan**, the SPV will establish, maintain, and strengthen an organisational structure that defines roles, responsibilities, and authority for implementing the Project’s ESMS, and will require the EPC Contractor and the potential O&M Contractor to do the same. The specific personnel profile, including clear lines of responsibility and authority, is defined in the E&S Resourcing Plan, along with the key E&S responsibilities, which will be communicated to the relevant personnel and to the wider Project organisation. Sufficient management support, and adequate human and financial resources, will be provided on an ongoing basis to ensure effective and continuous E&S performance.

Under the overall ESMS organisation of the Project, the SPV will assign a dedicated RAP Implementation Team responsible for the day-to-day delivery of RAP measures in collaboration with KGM, as provided in Figure 14-1.

The team will be led by SPV’s E&S Manager (already recruited) and include a Resettlement Specialist (To be recruited in Q1 2026) and two to three CLOs (to be recruited). These roles will be supported by SPV’s Senior E&S Specialist (already recruited), site E&S Chief (to be recruited) and site E&S specialists.

The core team will be supported by both in-house teams (design, construction, finance, and legal teams) and third-party implementation partners and consultants, as needed.

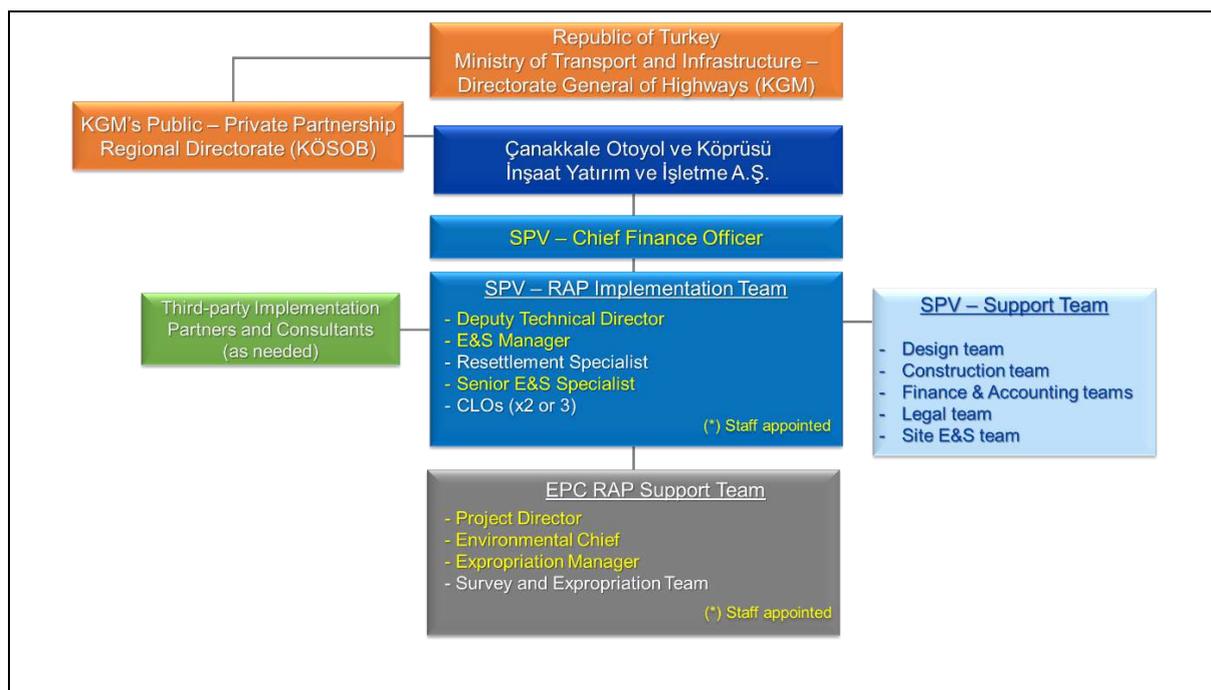


Figure 14-1. General Project Organisation and the RAP Implementation Team Structure

Roles and Responsibilities of the RAP Implementation Team Members

The roles under the RAP implementation team and their key responsibilities for RAP implementation are outlined in Table 14-1.

The support to be provided by the in-house and external support personnel, specialists or third-party implementation partners and/or consultants will be provided in the RAP.

Table 14-1. Key Roles and Responsibilities of the RAP Implementation Team Members

Role	Responsibilities
Corporate Management	
Senior Management Representatives in the SPV (i.e. SPV's Chief Finance Officer)	<ul style="list-style-type: none"> Coordinate with KGM as required to support the effective implementation of the RAP. Review and internally approve the RAP, including all relevant components such as entitlement frameworks, implementation costs (RAP Fund), and timeframes, as well as any necessary updates. Conduct periodic reviews of RAP implementation based on reports submitted by the Project Management. Serve as the decision-maker on specific RAP implementation matters, if required or requested by the SPV and EPC RAP teams. Undertake engagement with Lenders and their LESA on specific RAP implementation matters and progress. Allocate the financial resources necessary for RAP implementation.
SPV – Management	
Deputy Technical Director	<ul style="list-style-type: none"> Represents Senior Management Ensure that measures for the avoidance and/or minimisation of displacement impacts are considered during Project design and implemented on site, where feasible; communicate such measures to Corporate Senior Management Representatives for further discussion with and approval by KGM. Lead the communication and coordination with the KGM, represented by the KÖSOB Organise monthly coordination meetings during construction phase between the SPV and KÖSOB In coordination with the E&S Manager, ensure that the EPC Contractor and subcontractors are fully aligned with the RAP through relevant contractual provisions. Review and approve the RAP related information to be shared with the KGM, Lenders, and affected parties. Manage the financial resources allocated by the Senior Management for RAP implementation.
SPV – RAP Implementation Team	
E&S Manager	<ul style="list-style-type: none"> Lead the SPV's RAP Implementation Team and oversee the day-to-day implementation of the RAP in coordination with SPV – Deputy Technical Director, the Resettlement Specialist, CLOs and other relevant in-house support teams. Support the SPV – Deputy Technical Director in communication and coordination with the KÖSOB. Coordinate and supervise third-party RAP implementation partners and consultants for effective RAP implementation. Ensure the development and implementation of specific livelihood restoration and improvement projects in coordination with the RAP Implementation Team experts and third-party implementation partners and consultants. Act as the custodian of the Project-specific SEP, including the grievance mechanism, and ensure its documentation and regular updates. Coordinate Project CLOs to ensure effective outreach to vulnerable members of affected communities. Steer establishment of a dedicated RAP Grievance Database; ensure that all land acquisition-related grievances and feedback are recorded by the Project CLOs, separate from other project grievances. Review and convey land acquisition-related grievances and feedback from affected people to KGM in writing, through periodic (e.g. monthly) progress reports or on a case-by-case basis, if collected by the SPV through the Project grievance mechanism. Decide on appropriate measures and actions for land-related grievances to be managed internally by the SPV, with support from the Resettlement Specialist, CLOs, and relevant Project departments. Manage other RAP related social and human rights impacts identified in the ESIA, in accordance with the SPV's relevant management plans. Organise preparation and delivery of training sessions necessary for effective RAP implementation. Periodically review and evaluate the capacity of teams and experts involved in RAP implementation and inform the SPV – Deputy Technical Director and Corporate Senior Management Representatives in the SPV of any capacity-building needs.

Role	Responsibilities
	<ul style="list-style-type: none"> • Provide input to Project’s social media strategy in collaboration with relevant support teams. • Report regularly to the SPV – Deputy Technical Director and Corporate Senior Management Representatives in the SPV on RAP implementation progress and challenges. • Coordinate both internal and external RAP monitoring and reporting activities and ensure preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders.
Resettlement Specialist	<ul style="list-style-type: none"> • Ensure day-to-day implementation of the RAP in coordination with SPV – Deputy Technical Director, the E&S Manager, CLOs and other relevant in-house support teams. • Act as the interface between the SPV and EPC expropriation teams to follow up on and coordinate matters related to expropriation, court cases, land entry processes, and other related activities. • Provide support to the E&S Manager in reviewing and managing land acquisition-related grievances, including the identification of responsible internal and external parties for their resolution. • Obtain and review grievances and requests managed directly by KGM and convey the relevant information to the E&S Manager for integration into the Project’s Grievance Mechanism and RAP Grievance Database. • Compile monthly land acquisition progress reports and submit them to the E&S Manager for integration into the periodic Project reports submitted to KGM and Lenders by the SPV. • Review decisions issued under Article 27 and Article 10 court processes in coordination with EPC Expropriation Teams, including valuation amounts and set-off requirements; identify and report any cases where land seizure values are reduced by the courts at the conclusion of the Article 10 process to SPV – Deputy Technical Director, E&S Manager and Corporate Senior Management Representatives. • Guide and support affected people in completing administrative tasks associated with land acquisition and resettlements, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices).
Senior E&S Specialist	<ul style="list-style-type: none"> • Support the E&S Manager in the implementation of the RAP • Carry out RAP related responsibilities delegated by the E&S Manager
CLOs (male and female)	<ul style="list-style-type: none"> • Lead the daily on-site implementation of the RAP Disclosure and Engagement Action Plan (as outlined in RAP Section 10.4) and the Project Grievance Mechanism, along with the implementation of the broader Project SEP, under the supervision of the E&S Manager and Resettlement Specialist • Engage directly with affected people to implement RAP measures and actions, including regular community visits, calls, or other forms of communication, ensuring affected people are informed of their rights under national legislation and the RAP. • Establish and maintain a comprehensive database of all affected people, including physically and economically displaced households, individuals with vulnerabilities, and formal and informal users of affected parcels. • Ensure inclusive outreach to vulnerable groups and women under RAP implementation through dedicated sessions. • Guide and support affected people in completing administrative tasks associated with resettlement, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices). • Mediate issues between affected people and Project; forward community questions and concerns to the appropriate government authorities and the Project and corporate management representatives. • Maintain the dedicated RAP Grievance Database by accurately recording all land acquisition-related grievances and feedback received through various channels, ensuring it remains distinct from other project-related grievance records. • Ensure all grievance registered are forwarded to the E&S Manager or relevant departments for resolution, and properly closed out in compliance with the SEP. • Maintain detailed and accurate records of all engagement activities, including meeting agendas, minutes, and follow-up actions, in coordination with other experts. • Prepare and distribute communications material – such as brochures, reports, letters, and notifications – with approval from SPV Deputy Technical Director, E&S Manager and Expropriation Manager, as relevant. • Ensure registering of incoming documentation from both internal and external parties by relevant Project parties. • Identify site implementation problems and bottlenecks related to RAP and stakeholder engagement and report them to the SPV Deputy Technical Director, E&S Manager and Resettlement Specialist, as relevant. • Contribute to both internal and external RAP monitoring and reporting activities and preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders. • Coordinate and supervise EPC teams to ensure alignment and consistency across all engagement efforts.

Role	Responsibilities
	<ul style="list-style-type: none"> Guide and support affected people in completing administrative tasks associated with land acquisition and resettlements, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices).
Support Team ⁶⁰	<ul style="list-style-type: none"> Remain available to provide ongoing support to the RAP Implementation Team throughout the RAP implementation period. Support the establishment of the RAP Implementation Team by preparing job descriptions, participating in candidate interviews, and assisting with recruitment processes. Conduct necessary surveys and assessments, both site-based and desktop, for affected structures and buildings. Review official documentation of affected businesses to inform compensation and/or assistance for temporary business interruptions; this may include, but is not limited to, financial records (e.g. net income statements, salary records), licenses, and permits.
EPC Contractor – Support Team	
EPC Expropriation Team	<ul style="list-style-type: none"> Act as the interface between the SPV and the expropriation teams of the KGM to follow up on and coordinate matters related to expropriation, court cases, land entry processes, and other related activities. Ensure daily coordination with the KÖSOB and alignment between the expropriation process and the implementation of the RAP. Coordinate the work of other expropriation engineers employed under the Project. Coordinate the expropriation plan production works carried out by the national engineering firm (valuation contractor). Obtain and review grievances and requests managed directly by KGM and convey the relevant information to the SPV E&S Manager and Resettlement Specialist for integration into the Project's Grievance Mechanism and RAP Grievance Database. Monitor and track decisions issued under Article 27 and Article 10 court processes in coordination with KGM, including valuation amounts and set-off requirements; identify and report any cases where land seizure values are reduced by the courts at the conclusion of the Article 10 process to SPV – General Manager and Corporate Senior Management Representatives Guide and support affected people in completing administrative tasks associated with land acquisition, such as submitting applications (online or in person); completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices).
EPC Contractor – Environmental Chief	<ul style="list-style-type: none"> Ensure implementation of all RAP-related actions delegated by the SPV through the EPC Contract and subcontractor agreements. Maintain an organisational structure that aligns with the SPV's E&S structure, including clear roles, responsibilities, and reporting lines. Implement the E&S commitments outlined in the ESIA, SEP, ESMP, and other specific management plans incorporated in the EPC Contract, to avoid and/or mitigate construction-related impacts on affected people and their livelihoods; allocate adequate financial and human resources for effective implementation of those avoidance and mitigation measures. Continuously explore opportunities to avoid or minimise adverse impacts during construction and propose feasible measures to the SPV – E&S Manager. Ensure signing proper consent or lease agreements for lands that will be used temporarily during construction. Reinstate and return temporarily used land to its original condition and hand it back to the owners upon completion of use. Make payments for standing crops on parcels to be entered – if any – where land entry cannot be delayed until the harvesting season. Compensate for any verified damage or spillages to neighbouring (non-expropriated) lands or for damage to standing crops on lands not formally included in the Project footprint. Provide compensation for verified livelihood losses resulting from EPC Contractor activities. Reinstate any damages to public or private infrastructure and services caused by EPC Contractor activities, once verified. Ensure that any land acquisition-related grievances or feedback received by the EPC Contractor or subcontractors are recorded in Project's dedicated RAP Grievance Database maintained by the SPV, and addressed in coordination with the SPV in line with the Project SEP.

⁶⁰ The Support Team may include Design, Construction Finance, Legal, Accounting, Permitting, Human Resources (HR), Administrative, Public Relations teams among others.

14.4. Public – Private Partnership Regional Directorate (KÖSOB)

In order to carry out the construction and operation activities related to the Gebze–Orhangazi–İzmir Motorway Project (including the İzmit Gulf Crossing and connecting roads), which was constructed under the Build–Operate–Transfer (BOT) model and fully opened to traffic on 5 August 2019, a **Public – Private Partnership Regional Directorate (KÖSOB – Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü)** was established by KGM on 29 March 2011 under the provincial organisation, headquartered in Bursa Province.⁶¹

The Project falls within the responsibility area of the KÖSOB. For daily Project management issues, the SPV coordinates and collaborates closely with this Directorate.

KÖSOB will have a **site office at the main construction camp site**, which will enable close collaboration on Project management, including expropriation-related matters and RAP implementation.

14.5. Coordination between KGM and SPV in case of Court Proceedings (Article 27 and Article 10)

As outlined earlier, to ensure a smooth land acquisition process, KGM will undertake several actions, including but not limited to:

- **Ensuring fair compensation** through valuations based on current market prices;
- **Prioritising negotiated settlements** in accordance with Article 8 before initiating court proceedings;
- **Filing Article 10 lawsuits** within a reasonable timeframe – defined by KGM as one month – following the finalization of the Article 10 process; and
- **Timely disbursement of compensation payments** to ensure all affected individuals are compensated prior to land entry.

In parallel to the actions taken by KGM, the **SPV will provide additional support to ensure meaningful and timely engagement with all affected people**, including heirs of deceased owners, and to mitigate potential disadvantages that may arise from prolonged court processes. This includes supplementary compensation and livelihood support packages offered to each affected group under the RAP Fund. These measures are designed to prevent potential adverse impacts on landowners resulting from judicial proceedings and to meet the requirements of international lenders.

- As the Project progresses, **KGM will update the valuation rates for land and assets on an annual basis**, as outlined in Section 6.3.3.
- For ongoing and future expropriation process, KGM will continue prioritising purchase method (Article 8) through negotiated settlement over Article 27. Prior to conducting Article 8 consent negotiations in accordance with the Expropriation Law, **the SPV – working in coordination with KGM Regional Directorate’s chief engineering department for immovable properties – will inform the landowners, shareholders, and/or heirs of the affected parcels about the land acquisition process and their legal rights under the Expropriation Law**. This will include information on:
 - the steps heirs must complete to access their legal rights,
 - the support and entitlements to be provided by the SPV from the RAP Fund (in addition to the expropriation compensation to be provided by KGM),
 - and other relevant aspects of the process.

⁶¹ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx>

To support this information process, the SPV will distribute printed copies of KGM's booklet on procedural steps of expropriation in affected settlements ([Appendix B](#)).

GLAC documents have been prepared for affected lands, affected houses and affected businesses, in both English and Turkish. The GLACs provide a concise, clear, and non-technical summary of the RAP. Following its approval by the Lenders, **the SPV will distribute and present the GLACs to affected people** to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 27 – their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements.

In addition, **the SPV will assist the heirs of deceased owners in obtaining their inheritance certificates** where necessary and will facilitate travel and cover related expenses – such as notary and transportation costs – using the RAP Small Costs Fund, which is a component of the broader RAP Fund. The SPV will also keep KGM inform and coordinate with KGM as part of their ongoing daily communication to facilitate that the inheritance certificates of heirs are appended to the case files to be submitted by KGM to the relevant courts.

- As part of the Article 27 and Article 10 court processes, **the SPV will follow up on the deposit of land seizure and/or expropriation compensation into the bank accounts** of parcel owners and heirs. KGM will be consulted to ensure that this process is completed within a reasonably short timeframe.
- **The SPV will inform all previously identified owners and heirs of the parcels about the court decisions**, and provide guidance regarding the, the requirement to complete inheritance certificates in order to withdraw the deposited compensation, the availability of SPV support for payment or reimbursement of related expenses through the Small Costs Fund and subsequent steps of the process – including the provision of Full Replacement Cost from the RAP Fund to compensate for depreciation applied solely in the valuation of buildings/structures.
- Within the scope of the Article 10 court processes, **the SPV, in collaboration with KGM, will monitor the title deed registration and bank transaction procedures related to the owners, shareholders, and heirs of the parcels**, in order to verify that these processes are proceeding smoothly and without undue delays.
- **The SPV will monitor and track the outcomes of Article 27 and Article 10 court decisions in collaboration with KGM** – including valuation amounts and any set-off requirements determined at the conclusion of each process. In the event such cases arise, the SPV will identify them and develop corrective actions on a case-by-case basis, to be implemented in consultation with and subject to the agreement of the Lenders, as required.

15. Implementation Schedule and Change Management

6.1. Implementation Schedule

The overall Project Schedule is provided in **Section 2.5**. The Project schedule information, **key to RPF and RAP studies**, is presented in Table 15-1.

Table 15-1. Planned Schedule for RPF and RAP Preparation

No.	Tasks	Months / Weeks																			
		Nov 2025				Dec 2025				Jan 2026				Feb 2026				Mar 2026			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
0.	Key Milestones (exact dates TBD)																				
0.1	Finance Agreement Signing																				
0.3	Site Mobilisation																				
0.4	Start of Construction																				
0.5	Approval of Expropriation Plans by KGM and relevant Cadastral Offices																				
0.5.1	KM 0-35 (approved)																				
0.5.2	KM 35-70 (in progress according to Cadastral Office's internal procedures)																				
0.5.2	KM 70-105 (approved)																				
1.	Phase 1																				
1.1	Commencement of RPF by RAP Consultants																				
1.2	Provision of Available Project Documents to RAP Consultant (ongoing)																				
1.3	Draft Resettlement Framework																				
1.4	Final Resettlement Framework (TBD by Lenders/LESA)																				
2.	Phase 2																				
2.1	Provision of Additional Project Documents to RAP Consultant																				
2.2	RAP Baseline Surveys (exact dates TBD):																				
2.2.1	Phase 1: Key informant interviews and user identification surveys for KM 0-35 and KM 70-105																				
2.2.2	Phase 2: Resettlement Scoping Field Visit																				
2.2.3	Phase 3: RAP Surveys for KM 0-35 and 70-105																				
2.2.4	Phase 4: Key informant interviews, user identification, RAP surveys for KM 35-70⁶²																				
2.3	RAP Scoping Report																				
2.4	Draft RAP Preparation and Submission																				
2.5	Final RAP (TBD by Lenders/LESA)																				
2.6	GLAC Preparation																				
2.7	GLAC Distribution to PAPs by SPV (following its approval by Lenders/LESA)																				

◆ Completed milestones, future submissions

⁶² Once expropriation plans for this section become available.

6.2. Change Management

Changes may be triggered at various stages of the Project cycle and may arise from, but are not limited to, the following:

- Administrative or organisational changes at the KGM or Project **level** that affect Project and/or RAP implementation.
- Legislative changes affecting Project implementation (e.g. new permitting processes).
- Schedule changes (e.g. delays due to land **acquisition** or expropriation, permitting, construction challenges, severe climate conditions, natural hazards such as floods, landslides, or earthquakes, or other technical, financial, legal, or administrative factors).
- Changes in construction **methodologies**.
- Design optimisation or modifications – subject to approval by KGM – that may require additional land acquisition beyond the currently defined expropriation corridor, either during construction or, in limited cases, after commissioning. Such changes may stem from:
 - Adjustments to the Project description or footprint (e.g. new temporary or permanent facilities).
 - Changes in the boundaries of the expropriation corridor due to the emergence of new E&S issues requiring additional measures beyond the current footprint (e.g. discovery of biodiversity features or cultural heritage assets).
 - Technical requirements during construction to ensure Motorway safety and stability (e.g. additional slope stabilisation at embankments, drainage infrastructure for surface runoff).
 - Requests from affected people for additional underpasses, overpasses, or culverts, provided these are technically and financially feasible.
 - Relocation of existing infrastructure belonging to other institutions (e.g. overhead transmission lines, gas pipelines).
 - Significant environmental or social impacts that may emerge during the operation phase.
- Other relevant considerations raised by stakeholders through the **Project's** grievance mechanism.
- Concerns raised by the public, stakeholders, or lenders.
- Findings from field surveys and monitoring activities.
- Requests from KGM, whether related to or beyond the above-listed factors.

[Change Management Procedure](#)

The following steps will be applied for managing any changes in the Project that are relevant to the PRF and RAP:

Step 1 – Notification of the Change

When there are material changes related to the Project's land acquisition and displacement impacts during implementation, such changes will be reported by the SPV to the Lenders and the LESAs.

The SPV will contractually require the EPC Contractor and sub-contractors to notify the SPV, if they identify or become aware of such changes.

Step 2 – Review and Evaluation of the Change

The **SPV – E&S Manager**, with support from the RAP Implementation Team members, will review the proposed change as submitted through the change notification tools of the Project.

Additional supporting documentation may be requested from the EPC Contractor or subcontractors to fully evaluate the impact of the change.

The **SPV – E&S Manager**, in consultation with the Lenders and LESA, will evaluate whether any reassessment or additional due diligence is required (e.g. if a change in the financing or physical characteristics of the Project such as sites, facilities, or processes could involve different displacement risks and issues from those initially identified and assessed).

Step 3 – Final Decision on the Change

After reviewing the change, the **SPV – E&S Manager**, in coordination with the Senior Management, will make the final decision – if necessary, in consultation with relevant parties such as Lenders or other stakeholders – on the way forward. The decision will include actions to be implemented at the Project level, along with timelines and identification of responsible parties.

Actions in response to material changes may include, but are not limited to:

- **RAP Addenda Documents:** It may be decided that additional assessment, RAP addenda documents, stakeholder engagement and disclosure activities are required. Such documentation may be prepared in-house by the RAP Implementation Team, or third-party consultants may need to be appointed.
- **Stakeholder Engagement:** In cases of major changes to Project activities or the emergence of new land acquisition and involuntary resettlement risks, the **SPV – E&S Manager**, will inform relevant stakeholders immediately after identification. This ensures discussion of the changes and collection of feedback for consideration in the RAP review and update, as well as in the design of additional mitigation measures (e.g. increasing the frequency of RAP monitoring and reporting activities, developing corrective actions, etc.).
- **Staff Transition:** In cases where trained RAP Implementation Team staff of the SPV are rotated, or leave their role permanently or temporarily, the SPV – E&S Manager will require the outgoing staff to prepare a concise handover document. A structured handover process of at least **five working days** will be carried out to transfer knowledge and first-hand experience to the incoming staff responsible for relevant RAP tasks.
- **Refresher Training:** In addition to periodic training sessions, ad hoc refresher training sessions may be delivered (individually or in groups, as appropriate) under specific circumstances, such as:
 - Updates to RPF or RAP
 - Organisational changes requiring updated training
 - Significant incidents caused by inadequate land acquisition, resettlement and stakeholder engagement practices
 - Introduction of new tools, software, or databases specific to RAP implementation

Step 4 – Communication of the Final Decision

The SPV – E&S Manager will communicate the final decision and agreed actions to relevant Project stakeholders. The financiers will also be notified through submission of the completed Change Notification Form.

16. Budget

In accordance with the Expropriation Law, expropriation activities are carried out by KGM. The respective responsibilities of KGM and the SPV are outlined in the BOT Contract.

These responsibilities and cost allocations are governed by the provisions of the BOT Contract – Clause 13.

- The estimated total expropriation cost for the Project will be provided in the RAP.
- The portion of the Expropriation Cost related to the Motorway construction, amounting to approximately **EUR 32,000,000.00, shall be borne by the Appointed Company.**

The Appointed Company is required to pay this amount to the Administration on the date of first utilization under the financing procedure for the Project. After such payment is made, the Appointed Company shall no longer have any payment liability regarding the Expropriation Cost of the Project.

- **Any Expropriation Cost exceeding this amount shall be covered by the Administration – KGM, in accordance with Clause 13 of the BOT Contract.**

As the BOT Contract does not include provisions for land acquisition-related costs beyond expropriation – such as livelihood restoration, assistance to vulnerable groups, compensation for informal users, and monitoring including external compliance reviews and a RAP Completion Audit – **these expenses will be borne by the SPV through a dedicated RAP Fund.**

The RAP Fund will be allocated and managed by the SPV, separately from the Project's Expropriation Budget (also referred to as mandatory cash compensation to be provided by KGM). All costs associated with additional measures not covered under national law, as well as the human resources necessary for the effective implementation of the RAP, shall be covered through the RAP Fund.

The indicative budget for RAP implementation through the RAP Fund will be calculated as part of the RAP to be prepared following this RPF, based on KGM's expropriation budget and the valuation reports for affected parcels, which are being prepared by the valuation contractor.

The RAP Budget will be developed based on a conservative estimate aligned with the final entitlements to be defined in the RAP.

The RAP Budget to be allocated by the SPV will include a **contingency fund** to resolve unforeseen issues that arise during implementation and cover any unforeseen costs that may arise during RAP implementation.

Examples of potential contingency items that may trigger the utilisation of this fund are listed below:

- Compensation for claims, if deemed valid by the third-party valuation expert to be commissioned by the SPV during RAP implementation, related to non-residential or secondary structures (for example, structures built before the cut-off date but not included in the inventory of assets) or structures without evidence of ownership.
- Preparation of RAP documentation and provision of entitlements for potential future expropriation works, in case they are not funded separately. These may include final design modifications (subject to KGM approval) or displacement of existing infrastructure belonging to other institutions (e.g., energy transmission lines, water and wastewater networks, natural gas pipelines) if such modifications require additional expropriation for specific parcels. All such cases will be subject to further evaluation and decisions by KGM, Lenders, SPV, and other relevant institutions.

Table 16-1. Indicative RAP Fund Items

(0) KGM - Expropriation Budget (Mandatory Cash Compensation as per Expropriation Law of Türkiye)
(A) Lands
(B) Affected structures (<i>houses, non-residential structures, other major fixed investments/improvements</i>)
(C) Trees
(1) SPV – RAP Fund Items
(A) Cash Compensation to cover Replacement Cost for owners of Informal Structures on public or private lands
(B) Affected Lands (1) Top-up Cash Compensation to cover Depreciation Cost of non-residential structures on affected lands (for structure owners) (2) Cash Compensation for Transaction Costs (3) Crop Payments (as needed) (4) LRP (covered under RAP Fund – Item E)
(C) Affected Houses (1) Top-up Cash Compensation to cover Depreciation Cost of houses and structures (for structure owners) (2) Top-up Cash Compensation to cover Replacement Cost of houses and structures on private-lands in co-ownership status (for structure owners, who are the actual residents in the affected house) – if needed depending on KGM's compensation process (3) House Relocation Support Package (4) Moving Allowance (5) Cash Compensation to Cover Cost of Fixed Investments (for formal and informal tenants) (6) LRP (covered under RAP Fund – Item E)
(D) Affected Businesses (1) Top-up Cash Compensation to cover Depreciation Cost of business structures (for structure owners) (2) Business Relocation Support Package (3) Moving Allowance (4) Cash Compensation to Cover Cost of Fixed Investments (for formal and informal tenants) (5) LRP (covered under RAP Fund – Item E)
(E) Livelihood Restoration Plan (LRP) Fund
(F) Vulnerable Groups Fund
(G) Small Costs Fund
(H) Governance & Administrative Costs (1) Human Resources (Rap-specific Recruitment) (2) Equipment and Materials (mobile vehicles, printing, mobile phones, software) (3) RAP-specific Consultancy and Contractors (RAP implementation partners, third-party valuation experts, other consultancy)
(I) External RAP Monitoring (1) Periodic Post Financial Close Monitoring by LESA (included under Project's budget) (2) RAP Completion Audit
Total (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H) + (I)
Contingency (% TBD ⁶³ as part of RAP)
Grand Total (including contingency)

⁶³ A contingency budget of between 10 and 20 percent of the overall RAP Fund will be provided.

APPENDICES

Appendix A – Relevant Legislation and Procedures

A.1 – Relevant Articles of the Expropriation Law of Türkiye (No. 2942, 1983)

Article	Definition
Article 3 - Requirements for Expropriation	For the implementation of large projects that concern issues such as energy, irrigation and afforestation etc., administrations may expropriate by paying the fee for the immovables, resources and their easement rights in cash or as down payment in equal instalments, as required for the conduct of public services or interventions they are obliged to provide according to laws.
Article 4 – Constitution of Servitude (Easement Rights)	<p>Instead of expropriating the ownership of the immovables, easement right can be established by expropriation on a certain section, height, depth or source of the immovable if it is sufficient for the purpose.</p> <p>However, provided that the use of the property right of the owners is not hindered and necessary measures are taken in terms of safety of life and property, transportation lines such as cable cars and all kinds of bridges can be built on the immovable, subway and similar rail transport systems and tunnels can be built under the immovables based on the public benefit.</p> <p>In case the use of the right of ownership of the immovables is not prevented, no expropriation of the immovables shall be made. No value increase fee can be collected from the owners of the real estate due to the investment made.</p>
Article 5 – Authorities that Decide on Public Benefit	This article specifies the competent authorities that can take the public benefit decision. In case of the Project, public benefit decision was declared by MoTI in July 2022.
Article 7 – Procedures to be Completed Prior to Expropriation and Administrative Annotation	<p>The administration responsible from the execution of the expropriation process prepares or commissions a scaled plan indicating the borders, surface area and type of the immovable assets of resources on which expropriation is to be conducted or servitude (easement rights) to be constituted by way of expropriation, enables that the owners of the expropriated immovable asset, the ownerships if no title deed registrations are present and their addresses by binding them to documents through an inquiry it would conduct on the land registry, tax and civil registry records as well as additional inquiries.</p> <p>After the administration takes the decision on expropriation, the related annotation of the expropriation in the title deed is notified to the title deed administration where the mentioned immovable asset is registered. If the owner changes after the notification date, the title deed administration is obliged to notify the administration of any changes to occur in the ownership or in the rights in kind that are separate from the ownership.</p> <p>If the document to be obtained from the court indicating that a request for the identification of the expropriation fee and the registration in the name of the administration as per the Article 10 is not submitted to the title deed administration within six months starting on the annotation date, this annotation is ex officio deleted from the title deed records.</p>
Article 8 – Purchase Method	<p>According to the Law, the administrations shall apply the negotiated purchase method in the first place for the expropriations of the immovable properties registered in the title deed.</p> <p>Following the expropriation decision, the administration to expropriate shall determine the estimated value of the immovable property by assigning one or more in-house valuation commissions consisting of at least three persons in accordance with the principles of Article 11 of this Law and by obtaining reports from experts, institutions or organisations related to the subject, and making use of the information to be obtained from the Chambers of Industry and Commerce and local real estate offices, if required. Moreover, the administration shall assign one or more reconciliation commissions that consist of at least three people to carry out and finalise the negotiations over the estimated price.</p>
Article 10 – Identification of the	If the expropriation cannot be realised through procurement, the administration applies to the court of first instance in the locale of the immovable and requests that the expropriation fee for

Article	Definition
<p>Expropriation Fee by Court and Registration of Immovable in the Name of the Administration</p>	<p>the immovable asset be identified and decision be made for its registration in the name of the administration in return for the payment of this fee.</p> <p>Within 30 days of the application of the administration, the Court notifies the owner of the immovables through an annotated invitation on the date of hearing. To those whose addresses could not be found after inquiries an announcement is made according to Notification Law (Law No. 7201) inviting them to attend the hearing. The Court also publishes information on the expropriation at least once in a local newspaper (if there is any) issued in the location of the immovable and in one of the newspapers circulated across Türkiye.</p> <p>On the day of the hearing, the judge invites the parties to reach an agreement on the value of the immovable. If an agreement is reached, the judge considers this fee to be the expropriation fee. In cases where an agreement is not reached, the judge schedules an expedition (within ten days) to identify the value of the immovable asset and a date for the second hearing (within thirty days after the expedition). On the second hearing, if the parties fail to agree on the value once again, the judge will assign a new expert committee for the valuation within fifteen days and then identifies a fair and equitable expropriation fee by referencing both the reports and statements of the parties and experts. The identified fee is the expropriation fee of the immovable, resource or its easement rights. The Court grants fifteen days to the administration for the fee to be deposited in a bank on behalf of the owner. In cases where the right holder could not be identified, the court decides on the registration of the immovable in the name of the administration under the circumstances that the bank receipt indicating the amount was blocked to be given to the right holder to be revealed in the future and that this decision is notified to the title deed department and the bank where the fee was deposited. The provision on registration is definitive and the parties reserve their rights for appeal pertaining to the fee.</p>
<p>Article 11 – Principles for the Determination of the Expropriation Fee</p>	<p>The panel of experts to be established in accordance with Article 15 shall visit the location of the immovable property or resource to be expropriated, together with the court committee, and after listening to the relevant persons present, they shall prepare a report based on;</p> <ul style="list-style-type: none"> a) Sort and type b) Surface area c) All features and components that may add to its value and the value of each element separately d) Tax declaration, if any e) Valuations by the authorities on the expropriation date f) The net income the immovable property or resource on the agricultural lands shall bring if it is used as is and according to their locations and conditions g) For residential plots, the sales value according to the precedent sales without a special purpose before the expropriation day, h) For buildings, official unit prices and building cost calculations and depreciation i) Other objective criteria that shall be effective in determining the price, provided that the effect of each measure is explained which includes the answers to all these factors separately and the panel determines the value of the immovable property based on a reasoned evaluation report in accordance with the valuation standards accepted by the Capital Markets Board of Türkiye and by taking into account the statements of the relevant parties. <p>As part of the constitution of servitude (easement rights), any decrease in the value of the immovable or the resource due to expropriation will be justified in the valuation. This decrease in value is the expropriation cost.</p>
<p>Article 12 – Partial Expropriation</p>	<p>Value of partially expropriated immovable property refers to;</p> <ul style="list-style-type: none"> a) The amount of the expropriated part from the value appraised according to the principles specified in Article 11, unless the value of the unacquired part changes due to expropriation. b) The amount found by determining the amount of decreased value and adding the decreased value to the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is a decrease in the value of the unacquired part due to expropriation.

Article	Definition
	<p>c) The amount found by determining the amount of increased value and subtracting the increased value from the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is an increase in the value of the unacquired part due to expropriation.</p> <p>Shall the remaining part of a partially expropriated immovable is not suitable for utilization, this part shall also be expropriated upon written application made by the legal owner within thirty days of the notification of the expropriation decision in cases where no lawsuits were filed in the administrative court against the expropriation procedure.</p> <p>If an immovable asset subject to joint ownership that was partly expropriated was divided among stakeholders and left to the possession and utilization of one or more stakeholders, and if the partial expropriation performed involves the whole or a part of this land, any procedures related to the expropriation will then be conducted only in relation to this stakeholder(s) and the expropriation fee is paid to them in proportion with their stakes. The stakeholder(s) has/have the right to file a lawsuit only for this part. They have no remaining rights on the part of the immovable that was not expropriated, and their names are removed from the list of stakeholders. The expropriated areas are registered in the land registry in the name of the administration. Any conflicts arising out of the enforcement of this article are resolved by the judicial courts.</p>
<p>Article 14 – Right to a Lawsuit</p>	<p>A lawsuit for cancellation of land acquisition decision in the administrative court or for correction of the material errors may be filed against the expropriation procedure within thirty days as of the date of notification issued by the court as per the Article 10 -the date of notification is replaced by the date of announcement in the newspaper by the court for those who could not be notified- by the owner of the immovable asset subjected to expropriation.</p>
<p>Article 18 – Dispute on the Ownership</p>	<p>The administration identifies whether there are any disputes on the immovable to be expropriated by performing an inquiry at the title deed administration, land survey directorate and civil courts in the location of the immovable. Shall the inquiries indicate that there is a dispute on its ownership or that it was subject to a lawsuit, the entirety of documents prepared as per the Article 10 are submitted to the civil court of first instance of the location of the immovable and is requested that the expropriation fee of the immovable is determined as well as its registration is made in the name of the administration in return for the payment to be made to the right holder as soon as they have been determined.</p> <p>The initial and consequent instalments of the expropriation fee identified by the court are deposited in the time deposit accounts with quarterly terms each at the bank designated by the court.</p> <p>Upon application by the person adjudged by the court to be the rightful owner as a result of the ownership dispute, the court that determined the expropriation value shall instruct the bank to pay the money to this rightful owner, and the payment shall be made accordingly.</p> <p>If any person fails to comply with the court’s summons, the procedures set forth in this article shall be carried out in their absence.</p> <p>If the immovable property that has been expropriated transforms into a nature that does not require registration in the land registry in terms of the public service to which it has been allocated, the court shall order deletion of the registry entry upon request.</p> <p>During these registration and deletion processes, tax liabilities related to this immovable property shall not be sought from the owners. However, the land registry office shall notify the relevant tax office of the situation.</p> <p>The value determined by the court constitutes the expropriation value of the immovable property, resource, or easement right.</p>
<p>Article 19 – Registration of Immovable Assets not Registered in the Land Registry and Possessor (“Zilyet”) Rights</p>	<p>The administration initially identifies whether the immovable not registered in the land registry is one of the public assets listed in Article 16 of the Cadastral Law (Law No. 3402). If the immovable is not one of the public assets listed in this article, and that the ownership for the immovable is present and a claim for acquisition is made on the basis of ownership, the administration conducts an investigation at the location of the immovable by means of the experts selected as per the Article 9, collects the evidence and specifies the state of affairs in a record.</p>

Article	Definition
	<p>The entirety of the documents prepared by the administration and collected according to the Article 10 of the Expropriation Law is submitted to the civil court of first instance at the location of the immovable.</p> <p>The court identifies the expropriation fee for the immovable asset as per the procedure and duration specified in Article 10. If the court deems it sufficient to declare the immovable asset to be within the scope of the Turkish Civil Law on the expropriation date and to have been acquired through ownership, it conveys the expert report on the identification of the expropriation fee to the administration and this report along with the other documents given by the administration to the owner.</p> <p>The status of the immovable is communicated to the highest public official in charge of assets in that area while it is also announced at least once in a local newspaper issued in the location of the immovable and a newspaper circulated across Türkiye.</p> <p>If no objections are raised by the Treasury or any third parties within thirty days as of the last announcement, a period of fifteen days is granted to the administration for the expropriation fee to be deposited in the bank stated in the announcement as down payment and in cash or as the first instalment in the name of the owner. Upon the submission of the payment receipt, the Court decides on the registration of the immovable asset in the name of the administration and the payment of the expropriation fee to the owner. Whereas, this decision is communicated to the land registry office and the bank where the money is deposited. If an objection is raised within this period by the Treasury or third parties, the court decides on the registration of the immovable asset in the name of the administration after the identified expropriation fee is deposited in a deposit account opened in the bank to be paid in the future to the person who would prove their rightful ownership.</p>
<p>Article 20 – Evacuation of the Immovable Asset</p>	<p>As per this Law, evacuation of the immovable asset, registered by the land registry office under the name of the authority to whom's benefit expropriation is conducted, is demanded from enforcement officer. The enforcement officer notifies the residents of the corresponding immovable asset about its evacuation within the following 15 days. If the immovable asset is not evacuated within the notified time, judicial evacuation takes place. Objection of grievance do not halt the evacuation and the court shall not issue an interim injunction. Neither the owner nor the administration shall be held responsible due to the evacuation of the immovable asset.</p> <p>Evacuation of cultivated lands shall be done at the end of the harvesting period. In cases when it is not possible to delay evacuation until the harvesting period, the owner of the crops shall be compensated prior to land entry. The authority responsible from the expropriation is permitted to request the evacuation of the parcel on condition that the price of the crops to be determined by the court shall be compensated. If the price of the crops has already been taken into consideration in the valuation done as per the Article 11 and 12 of the Law, there is not requirement for revaluation and repayment of the crop price.</p>
<p>Article 25 – Limitation of Rights and Transfer of Ownership to the Administration</p>	<p>The expropriation procedure is initiated through the notification conveyed by the Court as per the Article 10, with regard to exercising of rights and fulfilment of obligations. The transfer of ownership to the administration is realised based on the decision for registration taken by the Court.</p> <p>The owner of the immovable loses his/her rights to engage in activities such as construction or cultivation or to make fundamental changes in the current structure of the immovable after the date of the registration decision taken by the Court. The value of activities performed after this date is not taken into account.</p> <p>(Additional Clause: 12 July 2013- 6495/27th article) For large projects such as dams, irrigation</p>

Article	Definition
	<p>networks and pipelines, highways, railways, harbours and airports, the decision for the public benefit is announced in the mukhtar's office of the neighbourhood and/or village where the immovable to be expropriated are located. After the last day of the announcement of the public benefit decision, the cost of the fixed installations on the immovable and the trees planted are not taken into account in the identification of the expropriation fee. This limitation on the immovable assets is valid for 5 years after the last day of the announcement.</p>
<p>Article 27 – Accelerated Expropriation</p>	<p>The immovable property subject to expropriation may be seized through accelerated expropriation under three circumstances; (i) in situations for which President takes decision regarding the need for national defense in the scope of the implementation of the Law on National Defense Obligations (Law No: 3634); (ii) in situations of emergency determined by the Presidential decision, or (iii) in extraordinary situations as envisaged by special laws. In such cases/situations, upon the request of the relevant administration, a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the procedures other than valuation shall be completed afterwards. In this process, upon request of the related administration, compensation amount for the immovable property shall be appraised by the court within 7 days through the experts assigned as per Article 10 and 15 of the Expropriation Law. Seizure shall only be made following the invitation to be done in accordance with Article 10 and the amount is deposited to the bank specified in the announcement. The related Directorate of Land Registry is notified about the seizure decision to be made by the Court. The provision related to the prohibition of the transfer or alienation of the immovable asset is annotated to the land register. The asset is evacuated as per Article 20 following the issuance seizure decision.</p> <p>Article 27 of the Law enables land entry earlier through an accelerated process when compared to the regular expropriation processes conducted under Article 10 of the Law. This said, Article 27 does not limit the rights and claims of the owners on valuation of land and fixed assets. The valuation process is done by the court or court nominated experts as per the Expropriation Law. In this process, land valuation performed by experts appointed by the court is only a determination and is not decisive. After this price is determined and deposited by the Administration into the account number as determined by the court, actions stipulated in Articles 8, 9 and 10 shall apply.</p> <p>It is necessary to receive a "public benefit" decision from the relevant institutions for accelerated expropriation. After this decision is received, approved and published in the Official Gazette, accelerated expropriation process starts. Differently from ordinary expropriation, accelerated expropriation is the method of seizing an immovable property in line with prescribed procedure and method on the condition that actions other than valuation are completed later on. Accelerated expropriation will be handled in the form of a lawsuit. Public institutions will apply to the court in order to get valuation done and receive an expropriation decision.</p> <p>The court only acts as a determination authority in this case. If the court determines the existence of public benefit and the value of the immovable property as determined by the Valuation Commission is blocked in the bank account of the owner thereof, the lawsuit is admitted. Admission of the lawsuit will not result in the replacement of the owner in the title deed. The admission of this lawsuit can only enable the administration to perform the action considered to have public benefit. However, actions will not be complete. Actions will be performed just as in normal expropriation process. The Administration will primarily try to purchase the property from its owner through negotiated settlement. If agreement is reached as a result of this procedure, the relevant price will be paid and expropriation procedure will be complete. However, if no agreement is reached, the administration will also file a lawsuit on "the Determination and Registration of Expropriation Price"</p>
<p>Article 29 – Payment of the Expenses</p>	<p>The per diem allowances of the court panel as per Article 10 and appraised costs by the Court for the experts arranged by the Court as per Article 15 and the fees of the settlement heads</p>

Article	Definition
	consulted during reconnaissance, and title deed fees, and other expenses as stipulated by this Law are paid by the administration responsible from the execution the expropriation.
<p>Article 30 – Transfer of an Immovable Owned by an Administration to Another Administration</p>	<p>This article articulates that immovable, resources and easement rights owned by public legal persons and agencies may not be expropriated by another public legal person or agency. The administration that requires the immovable, resource or easement rights identifies the fee according to the Article 8 of Expropriation Law. It lodges a written application at the administration owning the asset by stating the amount it would pay on the basis of this fee. If the owner of the asset fails to abide by the transfer and respond within sixty days, the conflict is settled via an affirmed decision within two months after being inspected by the relevant administrative office of the Council of State upon application by the receiving administration. If the parties fail to reach an agreement on the price, the receiving administration lodges an application at the court according to the procedure written in the Article 10 within thirty days as of the notification date of the Council of State decision asking for the expropriation fee to be identified. In the adjuration process to be conducted in this case, the court does not enforce the provisions of the Law dated 9/6/1938 and number 3533.</p> <p>A period of fifteen days is granted to the receiving administration for the fee identified as the expropriation fee as per the procedure envisaged in the Article 10 to be deposited in the bank specified by the administration in order to be given to the asset-owning administration and the receipt of the fee deposited to be submitted. This period may be extended as necessary for only once by the court. The court decides on the registration of the immovable asset in the name of the administration and the expropriation fee to be paid to the asset-owning administration upon the submission of the receipt indicating that the expropriation fee was deposited by the receiving administration in the bank in the name of the asset-owning administration and this decision is notified to the title deed department and the bank where the money was deposited. The provision on registration is definitive and the parties reserve their rights for appeal in relation to the fee.</p> <p>The immovable, resource and the easement rights thus taken over is deemed to have been received via expropriation and it cannot be used for transfer purposes or for any public purposes other than those allowed by the transferring administration. Otherwise, the transferring administration may receive the immovable back as per the Article 23. This matter is annotated in the field of declarations in the title deed log.</p>

A.2 – Other Laws relevant to Land Use, Acquisition, and/or Registration

Law	Scope
<p>Forest Law (No. 6831, 1956)</p>	<p>In accordance with the Forest Law, the Project must obtain permission from the Ministry of Forestry and Water Affairs to perform activities in forests or lands classified as forest and is required to indemnify damages to public forests resulting from the construction of the railway.</p> <p>The use of state-owned lands (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Agriculture and Forestry (former Ministry of Food, Agriculture and Livestock – MoFAL). Citizens can also rent treasury lands for agricultural, commercial, sports and social activities.</p> <p>The use of forestry land is regulated by the Forest Law No.6831 and the Pasture Law No. 4342. Registration of the ownership or easement rights will be carried out in accordance with the Cadastral Law No. 3402, and Land Registry Code (Official Gazette No. 28738).</p> <p>According to Law (17.06.2004 article 5192/1), the Ministry has the authority to give permission for the use of forestland. This permission cannot be longer than 49 years.</p> <p>The amendment made in the Forest Law in 2004 (Official Gazette dated 3 July 2004, number 25511) states that “in case of public benefit or exigency concerning the location or construction of defence, transportation, energy, communication, water supply, wastewater, petroleum, natural gas, infrastructure facilities and solid waste disposal sites; sanatoriums, dams, ponds and cemeteries; governmental health, education and sports facilities and related places in governmental forest areas, real and legal persons can be licensed by the Ministry of Forestry and Water Affairs in return for a determined value.</p> <p>In addition to the Law itself, the regulation on “Permits to be Given on Land Considered Forest Areas” (Official Gazette dated 22.03.2007 numbered 26470) settles the methods and principles of the approvals, permits and easement rights to be given according to the 16, 17, 18 and 115th articles of the Forest Law as well as defining their costs for works and transactions that will be realized.</p> <p>Section 10 of this regulation defines the terms on which other state authorities are provided with permission to establish roads, buildings and other facilities. Article 42 depicts that in cases of public benefit, permission to utilize forest lands can be given to other state authorities for the establishment of facilities used in fields such as petroleum, natural gas, solid waste, infrastructure etc.</p> <p>Another regulation recently published in the Official Gazette numbered 28976 and dated April 18, 2014 stipulates the implementation of Article 17/3 and 18 of the Forest Law. Article 9 of this regulation redefines the fees and the calculation of the fees to be collected from other authorities utilizing forest land.</p>
<p>Pasture Law (No. 4342)</p>	<p>According to this Law based on the views of the Pastureland Commission (comprising of the manager of the district management of Ministry of Food, Agriculture and Livestock, an agricultural engineer from the Ministry itself, a jurist, a representative of the National Property Directorate, a technician from the Title Deed Registry and Cadaster Directorate and a representative of the Chamber of Agriculture) the Governors in Project affected provinces have the authority to give permission for altering the classification of pasturelands.</p> <p>Neither the right of the public nor of the specific users of pastures is recognized under the local legislative framework. Compensation will be paid for pasture lands to the relevant public agencies.</p>
<p>Cadastral Law (No. 3402)</p>	<p>The Cadastral Law determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps in order to register land and to constitute the basis of the spatial information system as the Civil Law (Law No. 4721) stipulates.</p> <p>In accordance with the Project, section 4 (principles for the determination of ownership rights), 6 (financial provisions) and 9 (transitions and final provisions) of the Law will need to be referenced.</p>

Law	Scope
Land Registry Law (No. 2644, 1934)	In Türkiye, cadastral works are conducted primarily based on the Land Registration Law. The Law regulates the procedures and principles on the title deed transactions for real estate. This law specifies the authority that governs the registration of immovable properties.
Law on Soil Conservation and Land Use (Law No. 5403, 2005)	This Law sets forth the rules and principles for determining land and soil resources and their classification, preparing land utilization plans, preventing non-purpose utilisation, and defining the tasks and obligations to ensure land and soil preservation. Soil Preservation Boards are established in each province to examine, assess and monitor the activities related to the preservation, development and productive utilization of lands. The Law specifies the requirements and procedures regarding the use of agricultural lands for non-agricultural purposes.
Agricultural Reform Law on Land Arrangement in Irrigated Areas (Law No. 3083)	<p>The Agricultural Reform Law regulates several issues for lands that are irrigated and that have been determined by the Council of Ministers. The Law covers matters regarding land consolidation and allocation of land for other purposes rather than agriculture in case of need. It is stipulated in the Law that in areas where agricultural production has no longer economic viability due to fragmentation, land consolidation works will be realized to prevent fragmentation that will result in having an effect both on the livelihood and the work force of any family. The articles referencing land consolidation issues and that will be considered by the Project are Articles 6 and 13.</p> <p>In addition to the Law, the regulation on “Implementation of the Agricultural Reform Law for Land Arrangement in Irrigated Areas” deals with the provisions pertaining to the implementation of the Law 3083. Article 5 states that ownership of land belonging to real persons or public corporate entities cannot be transferred, conveyed, mortgaged and sold within 5 years after the decision of Council of Ministers has been announced in the Official Gazette. All restraints will be annotated to the land registry soon as this decision is officially announced.</p>
The Notification Law (Law No. 7201)	<p>The Notification Law No. 7201, with its amendments in 2003, 2008 and 2011, provides the basis for a process of notification for property owners. It consists of specific procedures to be followed to reach a range of public and private owners, including those whose addresses are unknown. According to the Law, provisions for notification include mail to known addresses; seeking support from local authorities; publication through an advertisement placed in a national newspaper published throughout the country in significant numbers; and electronic communications. The Law provides guidance for communicating with different categories of stakeholders, including resident owners, absentee owners, owners outside Türkiye, and various public agencies. The specificity and broadness of the Law support international policies’ emphasis on communications and consultation.</p> <p>The Notification Law details the process of notification for landowners and land users whose address is unknown as determined by the Notification Officer. According to the modifications made in the Law in 2011 (Article 10), the notification can be made wherever appropriate for the affected owner and/or to the last address known. If the person cannot be reached, notification is sent to the last known residence and is directed to the village or municipal quarter headmen.</p>
Land Registry Code (Official Gazette No. 28738, 2013)	This code aims to keep the land registry records in order with respect to the Civil Law (Law No. 4721). It comprises of the principles and procedures pertaining to ownership, limited real and individual rights of immovable assets, and their entry, amendment, cancellation and rectification to the land registry.

Appendix B – KGM's Booklet on Procedural Steps in Expropriation Processes (Cover Page and Sample Page for Frequently Asked Questions)

