ANTALYA ALANYA MOTORWAY

ANTALYA – ALANYA MOTORWAY PROJECT

RESETTLEMENT ACTION PLAN (RAP)

GUIDE TO LAND ACQUISITION AND COMPENSATION (GLAC)

– BUSINESSES –

–

JULY 2026

REVISION 2

CONTENT

A.	INTRODUCTION
B.	PROJECT DESCRIPTION
C.	LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS
D.	EXPROPRIATION PROCESS IN LINE WITH THE EXPROPRIATION LAW
E.	COMPENSATION AND ENTITLEMENTS UNDER RESETTLEMENT ACTION PLAN (RAP) TO MEET INTERNATIONAL STANDARDS
F.	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE
G.	PROJECT GRIEVANCE MECHANISM
H.	CONTACT INFORMATION FOR STAKEHOLDERS

APPENDIX: GENERAL DIRECTORATE OF HIGHWAYS' (KGM) BOOKLET REGARDING PROCEDURAL STEPS IN EXPROPRIATION ACTIVITIES

A. INTRODUCTION

1. What is Antalya-Alanya Motorway Project?

The **Antalya-Alanya Motorway** Project (the "**Project**") is a Public-Private Partnership (PPP), with the **Public Partner** – being the Republic of Türkiye Ministry of Transportation and Infrastructure (MoTI), represented by the **Directorate General of Highways (KGM)**, and the **Private Partner** – being the **Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.** (the Assigned Company).

Implemented under a **Build-Operate-Transfer (BOT)** model, the Project is one of two sub-projects that constitute the broader Afyonkarahisar-Alanya Motorway Project, which was initially tendered in 2010.

The Project is located in **Antalya province,** southern Türkiye and traverses the boundaries of **three districts** – **Serik, Manavgat and Alanya** – which are key touristic and commercial hubs of the country.

2. Who is the Granting Authority under the BOT Contract?

Within the context of the BOT Implementation Contract, the **Granting Authority** is the **Republic of Türkiye Ministry of Transportation and Infrastructure** (MoTI), represented by the **Directorate General of Highways (KGM)**. KGM is responsible for implementing the land acquisition and expropriation works required for the Project in accordance with the Expropriation Law of Türkiye.

3. Who is the Assigned Company under the BOT Contract?

The Company assigned under the BOT Implementation Contract is **Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş**. – a Special Purpose Vehicle (SPV) established by **Limak İnşaat Sanayi ve Ticaret A.Ş., an affiliate of Limak Holding**.

The Assigned Company is responsible for the **design, construction, financing, operation, and maintenance** of the Motorway until its transfer to KGM at the end of the BOT concession period.

4. How the Project is Financed and what are the Project's Applicable International Standards?

The Project is financed by international financial institutions (IFIs) and commercial banks. A Finance Agreement was signed between the Assigned Company and the Lenders on 6 October 2025.

The following international standards are applicable to the Project:

- **International Finance Corporation (IFC)** Performance Standards (PSs) (2012),
- **Equator Principles (EP) 4** (2020),
- **Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework** (2019), and

5. Why has a Resettlement Action Plan (RAP) been prepared, and how will it be implemented?

The land acquisition required for the Project results in risks and impacts related to both physical and economic displacement. Accordingly, a **Resettlement Action Plan (RAP)** has been prepared in line with applicable international standards, with the objective of developing and implementing measures to mitigate these risks and impacts on individuals owning and/or or using the affected lands and houses, as well as on the employers and employees of impacted businesses.

The entitlements, measures, and livelihood restoration and improvement programs under RAP are in addition to the compensation provided by KGM in accordance with the Expropriation Law. The additional costs associated with RAP implementation will be covered by the SPV **through the RAP Fund, which is allocated and managed by the SPV –** separate from KGM's Expropriation Budget.

The **RAP is a living document** and will be updated as necessary. It is disclosed in Turkish and English under the Project's ESIA Package at the Project website (www.antalyaalanyaotoyolu.com.tr).

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 singing of finance agreement, though **implementation of the key principles by the SPV has already commenced.**

6. What other Environmental and Social (E&S) studies have been undertaken for the Project?

The Project secured an **EIA Positive Decision** on 17 August 2018, in accordance with the Environmental Impact Assessment (EIA) Regulation in force at the time.

Additionally, an **Environmental and Social Impact Assessment (ESIA) package,** including a Non-technical Summary (NTS), Stakeholder Engagement Plan (SEP) and E&S Management Plans, compliant with the applicable international standards, has been prepared for the Project and disclosed in Turkish and English at the Project website (www.antalyaalanyaotoyolu.com.tr).

7. How the RAP has been reviewed independently?

Potential Lenders of the Project retained an independent **Environmental and Social Consultant (IESC)** in October 2024 to carry out an **Environmental and Social Due Diligence (ESDD)** review.

The purpose of the ESDD was to conduct an independent review of the Project's ESIA package – including the RAP – and to evaluate the compliance of land acquisition activities with the standards and requirements of the Lenders. Based on this review, the IESC also developed an **Environmental and Social Action Plan (ESAP).**

The RAP implementation will be periodically monitored by the **Lenders' IESC.**

8. Why this Guide to Land Acquisition and Compensation (GLAC) has been prepared?

This GLAC has been prepared to provide people affected by Project-related land acquisition ("Project Affected People" or "PAPs") with a clear and concise overview of **the expropriation process carried out by KGM** in accordance with the Expropriation Law, and summarize the **key principles of the RAP,** particularly regarding additional compensation and assistance measures that go beyond the legally mandated cash compensation to ensure alignment with international standards and Lender requirements.

In addition, this GLAC outlines how affected people can apply to the SPV to access RAP entitlements and convey their grievances, inquiries, and feedback to the Project parties.

There are three versions of the GLAC: (i) for affected lands, (ii) for affected houses, and (iii) for affected businesses. This version is the GLAC concerning affected lands.

B. PROJECT DESCRIPTION

9. What are the key Project Components?

The Project, designed as a **dual carriageway**, has a total length of **117.8 km**, encompassing both the main Motorway (84 km – 2x3 lanes) and connection roads (33.8 km – 2x2 lanes).

Other key Project components include **7** main interchanges, **5** tunnels, **16** viaducts, **22** bridges, **56** overpasses, **43** underpasses, and **308** culverts, with **auxiliary features** including an Operational and Maintenance (O&M) Centre, four Motorway Service Facilities, toll collection areas and temporary construction facilities.

10. Are there any associated facilities of the Project?

There are no additional associated facilities in the current design. Please refer to Question 15 for information regarding temporary facilities to be used during construction.

11. What is Motorway Expropriation Corridor?

The **expropriation corridor** defines the boundaries within which land acquisition, expropriation and all construction activities are carried out for the Motorway and associated connection roads.

The width of the expropriation corridor varies along the route, with the minimum and maximum widths as follows:

- **Minimum width: ~ 55 m**
- **Maximum width: ~450 m** (at the location of service areas)

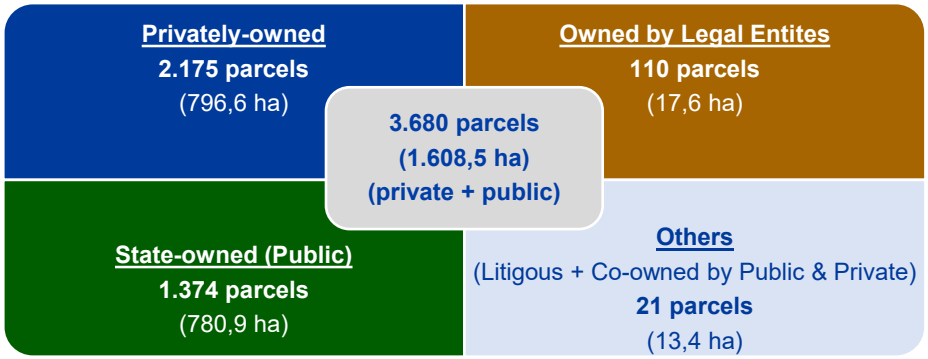
12. Which Settlements are affected within the Expropriation Corridor?

The land acquisition for the Project affects 3 districts and 57 neighbourhoods.

- **Serik (12 neighbourhoods):** Deniztepesi, Sarıabalı, Yukarıkocayatak, Asağıkocayatak, Kayaburnu, Dikmen, Çandır, Asağıçatma, Cumalı, Burmahancı, Üründü, Belpınarı
- **Manavgat: (34 neighbourhoods):** Çakış, Taşağıl, Hocalar, Gündoğdu, Yavrudoğan, Çolaklı, Seki, Kalemler, Evren, Ilıca, Yeniköy, Şişeler, Evrenleryahşi, Dolbazlar, Yukarıışıklar, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacıisali, Hacıobası, Kızılot, Uzunlar, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya
- **Alanya (11 neighbourhoods):** Alara, Cakallar, İncekum, Avsallar, Akdam, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

13. How many Parcels are Affected?

There are **3,659 private, legal entity, and public (state-owned)** parcels to be acquired **within Project's expropriation corridor** as well as 21 other parcels within litigation and co-ownership by public and private



14. What is the land registry type of affected parcels?

The majority of the affected parcels are registered as **agricultural land**, **road**, and **forest**.

Number of Parcels per Land Registry Type (3.680 parcel)	Area of Parcels per Land Registry Type (1.608,5 ha parcel)
• **Agricultural** (2.718 parcel)	• **Agricultural** (825,6 ha)
• **Non-registered** (413 parcel)	• **Non-registered** (99,4 ha)
• **Forest** (150 parcel)	• **Forest** (554,1 ha)
• **Land with structures** (148 parcel)	• **Land with structures** (42,2 ha)
• **Constructible plot** (169 parcel)	• **Constructible plot** (32,9 ha)
• **Litigous** (21 parcel)	• **Litigous** (13,4 ha)
• **Pasture** (3 parcel)	• **Pasture** (0,2 ha)
• **Others** (58 parcel)	• **Others** (22,1 ha)

15. Which temporary facilities will be required during construction?

During the **construction phase**, the Project will utilise various temporary facilities, including **construction camp sites**, **production plants and facilities** (such as concrete batching plants, crushing/mechanical plants, and asphalt plants), as well as **quarries** and **excavated material storage sites**.

A list of planned facilities is included in the RAP.

Construction Camp Sites	• Temporary Construction Camp (KM 59+500) • Main Construction Camp Site (KM 64+500) • Manavgat Construction Camp Site (KM 87+500) • Alanya Construction Camp Site (124+300)
Plants and Facilities	• 7 concrete plants • 4 crushing/mechanical plants • 3 asphalt plants
Quarries	• 11 potential quarries
Excavated Material Storage Sites	• 20 potential excavated material storage sites

16. How is the private land for temporary facilities acquired by the Project?

Private parcels required for temporary facilities are acquired by the SPV/EPC through rental agreements, mutual protocols, or other similar arrangements made with the landowners or shareholders.

Upon completion of temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed terms.

17. What are key milestones in the Project schedule?

No	Key Milestones / Tasks	Date
0	**BOT Contract Signing, Site Delivery**	14 October 2024
1	**Expropriation**	
1.1	Start of inventory of assets and valuation study commenced by appointed valuation contractor	November 2024
1.2	Start of expropriation procedures – through Article 8 negotiations – by KGM	February 2025
1.3	Completion of valuation	Q2 2026 (*Excluding the zoned sections of the Alarahan and Alanya West connecting roads.*)
1.4	Completion of Article 8 negotiations as part of expropriation procedures undertaken by KGM	
	Phase 1: KM 52 – 56; KM 74 – 104; KM ~64 (O&M Centre), KM ~80 (Concrete Plant)	February – August 2025 (***completed***)
	Phase 2: KM 56 – 74; KM 104 – 116; Connection Roads: Manavgat East, D-400, Serik and Taşağıl	September 2025 – January 2026
	Phase 3: KM 116 – 141; Connections roads: Manavgat, Alarahan, Alanya West and Konaklı	Q3 2026 (target)
1.5	**Phase 4:** Manavgat, Alarahan, and Alanya West Zoned Section Connection Roads	Q1 2027 *(target)*
2	**E&S Studies and Finance Agreement**	
2.1	Start of ESIA Package studies	March 2024
2.2	Start of RAP studies	April 2025
2.3	ESIA Package Disclosure by SPV, Lenders (60 days)	Q2 and Q3 2025
2.4	Finance Agreement Signing	6 October 2025
3	**Construction Works**	36 months after Signing
3.1	Land entry by the Project for design-related activities	November 2024
3.2	Site Mobilisation and Start of Construction	March 2025
3.3	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
	KM 52+000 – 80+000	November 2027 (*target*)
	KM 80+000 – 114+750	January 2028 (*target*)
	KM 114+750 – 141+705	November 2027 (*target*)
3.4	Tunnels, Viaducts, Superstructure, O&M Centre, Motorway Service Facilities (MSFs) and Other Secondary Works	March 2028
4.	**Motorway Commissioning**	Within 36 months from the date of signing the finance agreement

C. LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS

18. What is the status of land acquisition?

A **Public Benefit Decision** (No: 2023/371) for the Project was declared by the MoTI on **28 November 2023.**

A Presidential Decree (No. 9708) 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 Gazette (No. 32857) on **30 March 2025.**

The **Expropriation Decisions** were taken for the Project by KGM between December 2024 and May 2025.

Pursuant to these decisions, **land acquisition activities for the Project commenced in February 2025**.

- Between February and August 2025, expropriation procedures were initiated for 22% of the **private parcels through Article 8 invitations and negotiation meetings.**
- KGM has resorted to the **accelerated expropriation** for **3%** of the **private parcels.**
- Forestry permits have been obtained for over 75% of the forest lands located within the Motorway's expropriation corridor.

Planned Schedule of Article 8 Negotiation Meetings

Negotiation Meeting Date	Settlements
Completed between February – September 2025	Serik: Deniztepesi, Sarıabalı,Dikmen
	Manavgat: Şişeler, Taşağıl, Aksaz, Cevizler, Demirciler, Hacıali, Hacıisalı, Hacıobası, Karaöz, Sülek, Aşağıışıklar, Bucakşeyhler, Dikmen, Ulukapı, Yukarıışıklar Evrenleryavşi, Kalemler, Seki, Yeniköy
October 2025 *(planned)*	Manavgat: Çakış, Çolaklı, Gündoğdu, Hocalar, Yavrudoğan, Taşağıl
November 2025 *(planned)*	Serik: Aşağıkocayatak, Çandır, Dikmen, Kayaburnu, Yukarıkocayatak
	Manavgat: Hacıobası, Kadılar, Karakaya, Odaönü, Örenşehir, Uzunlar, Yalçıdibi
***Completed** between* January and February 2026	Serik: Aşağıçatma, Belpınar, Burmahancı, Cumalı, Deniztepesi, Sarıabalı, Üründü
***Completed** between* February and April 2026	Manavgat: Evren, Ilıca, Hocalar, Kalemler
End of 2026 *(Target)*	Alanya: Alara, Çakallar, Akdam, İncekum, Avsallar, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

19. What is the status of land entry and construction?

The site was officially delivered by KGM to the SPV in October 2024, following the signing of the BOT Contract.

After site delivery, design-related activities – including drilling operations– were initiated in **November 2024**.

Site mobilisation for Project construction began in **March 2025**.

Currently, **construction works are ongoing primarily on forest parcels**, **for which forestry permits have been obtained as well as private parcels with their respective expropriation processes completed.**

As the expropriation of privately owned parcels is finalised, construction activities are also initiated by the SPV and EPC on those parcels following the compensation payments by KGM, in line with the national Expropriation Law, and the provision of additional support by the SPV under the RAP.

20. What are the potential displacement impacts of the Project and who would be affected?

Permanent or temporary land acquisition for the Project will lead to **physical or economic displacement** for the **owners and/or users (formal or informal)** of the affected lands and structures.

The land acquisition-related impacts are primarily classified under the following:

(i) **Affected lands** (may include non-residential and non-commercial structures)
(ii) **Affected houses** (299 building on 231 parcels with 341 households)
(iii) **Affected greenhouses** (599 greenhouse units on 347 parcels)
(iv) **Affected businesses** (29 businesses to be relocated + 8 roadside local product vendors operating on lands already expropriated by KGM)
(v) **Impacts on vulnerable people**
(vi) **Temporary losses/impacts during construction**, and
(vii) **Impacts during operation**

21. Will there be further land acquisition beyond the current expropriation Corridor?

The Project may require **further land acquisition** beyond the currently defined expropriation corridor, either during construction or, on a limited basis, after commissioning.

In case of future land acquisition requirements, the required land will be acquired by KGM in line with the Expropriation Law. Potential displacement impacts and access restrictions associated with such land acquisition or expropriation will be managed by the SPV – in collaboration with KGM – in accordance with the RAP principles.

22. What are the cumulative land acquisition and resettlement impacts of the Project?

Cumulative land acquisition impacts may arise when landowners or users are affected by multiple, overlapping land-related acquisitions linked to the Project or other developments in the region or directly to the Project.

During RAP implementation a field-based cumulative impact assessment study will be conducted by the SPV, with support from third-party technical consultants, to make parcel-based identification of affected owners and users, assess and address these impacts under the specific budget allocated by the SPV.

D. EXPROPRIATION PROCESS IN LINE WITH EXPROPRIATION LAW

23. What is the legal basis of the expropriation process?

In the Republic of Türkiye, expropriation is carried out in accordance with **Article 46 of the Constitution** and implemented through the provisions of **Expropriation Law (No. 2942).**

The **Directorate General of Highways (KGM)** is responsible for the expropriation of privately-owned parcels in accordance with Türkiye's Expropriation Law (No. 2942), as well as coordinating the allocation of public parcels.

According to the BOT Contract, the SPV is responsible for covering a portion of the expropriation costs for the Project. The amount to be covered by the SPV is specified in the BOT Contract. Any costs exceeding this specified amount will be covered by KGM.

24. Which procedures does KGM carry out under the Expropriation Law?

Land acquisition is conducted through either negotiated settlement (Article 8) or judicial expropriation.

For detailed information on the expropriation process carried out by the KGM and its procedural steps, please refer to the booklet titled *"**Procedural Steps in Expropriation Activities Conducted by the General Directorate of Highways**"*, which has been distributed by the SPV alongside this GLAC.

25. Who is eligible for compensation under the Expropriation Law?

Under national legislation, the following categories of PAPs are eligible for compensation:

Affected Asset	Eligible PAPs
Private Parcels	• **Owners** of lands, trees, crops, structures on affected lands • **Formal land users** (with official documentation) for trees, structures, crops on affected lands • **Informal land users who have evidence** of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19) • **Litigant owners/shareholders or formal and informal users of litigious parcels**
Public Lands	• **Formal public land users** (who have official documentation, e.g. adequate pay "ecrimisil", rental agreement) for trees, crops, and structure • **Informal public land users who have evidence** of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19)
Business Structures	• **Owners of affected business structures** • **Formal (tenants) or informal users affected business structures**

E. COMPENSATION AND ENTITLEMENTS UNDER RAP TO MEET INTERNATIONAL STANDARDS

26. What additional compensation and entitlements are provided by the SPV through RAP implementation, beyond those offered by KGM under the Expropriation Law?

In addition to the compensation provided by KGM in accordance with the Expropriation Law, **the SPV implements supplementary compensation and livelihood restoration measures under the RAP** for the affected businesses.

The SPV has established a dedicated **RAP Fund** for covering all costs arising from the implementation of additional measures beyond those required under national legislation. This Fund is allocated and managed by SPV, in coordination with KGM.

27. What are the Key Compensation and Assistance principles outlined in the RAP?

- Avoidance of Forced Eviction: The Project will not carry out forced evictions except in accordance with national legislation and the requirements of IFC PS5.
- Prioritisation of Purchase through Negotiated Settlement over Expropriation: KGM has prioritised negotiated settlements through Article 8 (purchase method) under this Project. Article 27 will be used by KGM as a last resort, only after Article 8 process.
- Compensation at Full Replacement Cost: All compensation to people affected by land acquisition will be provided at full replacement cost. This includes market value plus any applicable transaction costs, as required by Lenders.
- Livelihood Restoration and Assistance in addition to cash compensation: The SPV will provide livelihood restoration and assistance measures to eligible affected businesses, including their employers, and formal and informal employees, in accordance with the requirements of the Lenders.
- Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owners and tenants of affected structures at least **three months** in advance of the commencement of expropriation, in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time (more than six months) 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. Each owner will be granted a six-month notice period to vacate the property following notification, unless a mutually agreed alternative timeframe is established.

28. What is Cut-off Date for Eligibility?

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 cut-off dates are determined **based on the completion date of the census and asset inventory surveys** conducted in each respective settlement. Therefore, the cutoff is specific to each affected settlement.

The SPV posts the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions. These are posted in the offices of the mukhtars, local coffee houses, and other appropriate public venues within the respective affected settlements.

The affected businesses are also individually notified by the SPV.

29. Who is Eligible for Compensation and Assistance under RAP?

All people affected by the Project and owning and/or using (formally or informally) the affected lands and assets **before the cut-off dates** defined in the RAP are eligible for compensation and assistance under RAP.

Accordingly, **people who encroach on the Project area after the cut-off date** are **not** eligible for compensation or assistance provided through the implementation of the RAP.

Affected people who believe they have not been included in the process or are eligible for the entitlements can apply to the Project CLOs with the required documents and an application letter. Their eligibility for compensation and/or assistance will be evaluated by the SPV. After the evaluation, they will be informed of the outcome, and if deemed eligible, they will be granted access to the relevant compensation and/or assistance.

The eligibility categories for affected lands and businesses identified in the RAP are as follows:

Affected Lands	• Landowners (private parcels) • Owners and users of litigous properties • Owners of non-residential and secondary structures on affected lands (maybe formal or informal user of affected land) • Vulnerable landowners and land users
Affected Businesses	• Formal employers (owner or tenant at the affected business structure) • Informal employers (owner or tenant at the affected business structure) • Employees of the affected businesses (formal or informal) • Vulnerable employers and employees

30. What are the RAP entitlements specific for owners and users of affected private and public parcels?

For detailed information, please refer to the **GLAC for affected lands.**

31. What are the RAP Entitlements for Owners of Affected Businesses that will be permanently resettled?

- **Business owners (Employers) – who are "owners" of the relocated business structure**

In accordance with the Expropriation Law, cash compensation by KGM is provided to structure owners. Depreciation is applied. No compensation is provided by KGM for loss of income.

The owners of affected businesses are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Top-up cash compensation** to cover the amount deducted for depreciation by KGM and achieve full replacement cost.
- **Pre-Location Financial Support Package for Business Owners** (to be provided by the SPV through a milestone-based payment approach as outlined in the RAP);
  - Cash Compensation to cover cost of fixed (non-movable) investments/improvements (for portion not covered by KGM).
  - Moving allowance to cover disassembly, transportation and assembly costs of movable assets (for portion not covered by KGM).
  - Business relocation support package to cover other business-specific relocation-related expenses such as real estate agent service fee, title deed transfer costs, 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 Financial Support Package for Business Owners** to compensate net income loss during the temporary business interruption period **up to 6 months** until successful reestablishment of the affected business – for eligible business owners, cash compensation support will be provided by the SPV on a monthly basis.

  ***(Important Note to PAPs:** Employers are required to provide financial and other relevant documentation upon the request of the SPV. These documents will be reviewed by the SPV to ensure a fair determination of the level and duration of support).*

- Access to **External Business Advisory Services** for 36 months.

- **Business owners (Employers) – who are "tenants" at the relocated business structure**

As per the Expropriation Law, cash compensation is provided to structure owners. If both the owner and the tenants provide their consent, tenants may be compensated by KGM for the non-movable and movable assets determined to be in their ownership. No compensation is provided by KGM for loss of income.

The owners of affected businesses employers are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Pre-Location Financial Support Package for Tenant Business Owners** (to be provided by the SPV through a milestone-based payment approach as outlined in the RAP);
  - ❖ Cash Compensation to cover cost of fixed (non-movable) investments/improvements made by the tenants (for portion not covered by KGM).
  - ❖ Moving allowance to cover disassembly, transportation and assembly costs of movable assets (for portion not covered by KGM).
  - ❖ Business relocation support package to cover other business-specific relocation-related expenses including rental allowance (three-month rent allowance, based on the market rental rate of the replacement business structure to be rented), real estate agent service fee (equivalent to the market rental rate of the replacement business structure to be rented), and allowance for other relocation related expenses, which are specific to each business (such as environmental permits, H&S related permits and approvals, etc.).
- **Post-relocation Financial Support Package for Tenant Business Owners** to compensate net income loss during the temporary business interruption period **up to 6 months** until successful reestablishment of the affected business – for eligible business owners, cash compensation support will be provided by the SPV on a monthly basis. to affected business owners to compensate net income loss during the temporary business interruption period (**6 months**).

> ***Important Note to PAPs:*** *Employers are required to provide financial and other relevant documentation upon the request of the SPV. These documents will be reviewed by the SPV to ensure a fair determination of the level and duration of support.*

- Access to **External Business Advisory Services** for 36 months.

- **Business owners (Employers) Business owners – which would terminate operations (business shut-down) due to relocation**

As per the Expropriation Law, no compensation is provided by KGM for loss of income.

In cases where business termination is unavoidable and directly linked to relocation (this will be confirmed by the external Business Advisor(s) to be retained by the SPV), the SPV will provide **one-off** cash compensation support to the affected business owners. The external Business Advisor(s) will determine the valuation criteria and the appropriate level of support on a case-by-case basis, using official financial and accounting records (e.g. tax declarations, balance sheets from the previous year, etc.).

Affected business owners and their employees will be given priority consideration for employment opportunities generated by the Project and have access to the External Business Advisory Services to be arranged 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.

32. What are the RAP Entitlements for Owners of Affected Businesses that will not relocate but face partial loss of structures at the existing premises?

As per the Expropriation Law, cash compensation is provided to structure owners. Depreciation is deducted.

The owners of affected businesses employers (owner or tenant at the affected structure) are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- **Top-up cash compensation** to cover the amount deducted for depreciation by KGM and achieve full replacement cost (only for structure owners)
- **Support through construction teams 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, where appropriate.
- **Assistance for relocating affected movable structures and auxiliary facilities** to another location within the existing premises or nearby surroundings – in coordination and consultation with the business owner to minimise any interruption to business operations.
- Access to **External Business Advisory Services** for 36 months.
- **Monitoring requests and managing grievances** to identify any impact on the business (e.g. access restrictions caused by construction or during operation) and develop and implement corrective actions in consultation with the business owner.

33. What are the RAP Entitlements for the Formal and Informal Employees of Affected Businesses?

As per the Expropriation Law, no compensation is provided by KGM to formal or informal employees.

Employment status and conditions of employees will be identified by the SPV **three** months before start of expropriation.

They are entitled to receive following compensation and assistance from SPV under RAP:

- **Formal and Informal Employees** of relocated businesses affected by **temporary** income loss
    - **Gross salary support** (up to **three** months) to avoid temporary interruption of employee salary payments due to relocation (to be assessed and identified by the External Business Advisor(s) of SPV based on monitoring outcomes)

      If the RAP monitoring (internally by SPV and externally by IESC) proves that there is no adverse impact/interruption on the income of the employees, the SPV will **not** provide any gross salary support for the employees.
- **Formal and Informal Employees** affected by **permanent** income loss (due to business shut-down, dismissal, etc.)
    - **Review and evaluation of permanent income loss cases by External Business Advisor(s) of SPV** and provision of following support when it is verified that permanent income loss (that take place within 6 months after the relocation) is directly related/inevitable due to relocation of the business:
        - ❖ **For formal employees:** 3 months of gross salary support by SPV in addition to severance payments, unpaid annual leaves and other gained benefits to be provided by their official employers in line with the Labour Law.
        - ❖ **For informal employees:** 3 months of gross salary support by SPV plus priority for employment in the Project construction (if they meet the Project employment criteria) and other employee-specific measures to be developed by the SPV (e.g. specific skill trainings to increase opportunity for employment in similar or other sectors) and implemented by SPV on a case-by-case basis.)

34. What specific RAP entitlements are available for people affected by construction impacts?

The SPV and construction (EPC) contractors (including subcontractors) will implement measures specified in the Project ESIA, ESMP and subject-specific management plans to avoid, and where avoidance is not possible minimise and/or compensate the impacts on people and environment.

PAPs may contact Project CLOs through contact information provided at the end of this GLAC to submit their construction-related grievances and feedback through Project's Grievance Mechanism.

35. What Livelihood Restoration, Improvement, and Assistance Packages are available to the Owners of Affected Businesses (Employers) in related to their affected business operations?

Livelihood restoration, improvement, and assistance will be provided to both employers and employees – whether formal or informal – of businesses affected by the Project. These measures aim to support the successful re-establishment of relocated businesses at their new locations, reduce business interruptions during the transition and prevent potential shutdowns, and help restore (or where possible, improve) their income levels.

The support packages available to affected businesses will include the following measures:

Livelihood Restoration Improvement and Assistance Packages for Affected Businesses				
Package 1 External Business Consultancy Support for Relocation (for 36 months)	**Package 2** Pre-relocation Financial Support Package to Business Owners	**Package 3** Post-relocation Financial Support Package to Business Owners	**Package 5** Financial Support Package to Employees	**Package 6** Priority in Project Employment

The SPV will retain an external Business Consultancy Company (Business Consultant), comprising a team of experts specialised in business development and management for micro, small, and medium-sized enterprises (MSMEs). The consultancy services will be provided over a period of 36 months, aligning with the duration of RAP implementation.

36. How will eligible PAPs be identified, and which documents will be requested from them for eligibility evaluation and decision-making?

During RAP implementation, the SPV will proactively engage with the affected people, including businesses, to identify potential eligible people and inform them about the livelihood restoration, improvement and assistance measures available to them and requested documents.

The eligibility of affected business employers and employees to benefit from RAP entitlements will be evaluated by the SPV on a case-by-case basis.

Important Note to PAPs: *PAPs may also contact the Project CLOs using the contact information provided at the end of this GLAC to request further information, share suggestions, or express their interest in participating in the relevant support packages.*

The documentation requested from PAPs for the evaluation of their eligibility for RAP entitlements may include, but is not limited to, the following.

It should be noted that this list is not exhaustive, and the SPV reserves the right to request additional documentation at any stage of the eligibility assessment process:

Affected Businesses

- Title deeds for affected business structures (*for structure owners*)
- Lease agreements (*for formal users - tenants of land or business structure*)
- Legal company documentation for affected businesses (*for formal business owners*)
- Financial records, accounting documents, social security registration, permitting documentation, etc. (*for formal business owners*)
- Information and documentation on informal employees in relation to their informal employment terms and duration, salaries, residency or work related documentation of foreign workers, etc. (*for formal and informal business owners*)
- Documentation of moving and transaction costs, including fees paid to authorities and service providers, and price offers/quotes as requested by the SPV and other transaction costs (*for formal and informal business owners*)
- Evidence of expenditures made for fixed investments and improvements (*for formal and informal business owners*)

F. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

37. How will PAPs and interested parties be engaged during the Disclosure Period and RAP implementation period?

The Project has a **Stakeholder Engagement Plan (SEP)** disclosed at the Project website (www.antalyaalanyaotoyolu.com.tr)

The RAP separately includes a detailed **Stakeholder Engagement Action Plan** for RAP disclosure and implementation phases. The following RAP specific disclosure activities are conducted:

- The RAP (including the GLAC) **will be published in English and Turkish on the SPV and Lenders' websites**, in line with their disclosure policies and timelines.
- This GLAC, explaining the entitlements and next steps clearly to all affected people and stakeholders, will be delivered to the offices of mukhtars and directly to affected people and vulnerable individual in each settlement.
- The **hard copies (in Turkish)** of the final RAP and GLAC will be made available at the following locations: Project Information Office in Serik, Project's Construction Camp Sites, and Offices of the settlement heads (mukhtars)
- The **SPV CLOs will engage individually with affected businesses that include vulnerable employers and employees** to distribute the GLAC and communicate the key information from the RAP, as applicable.
- Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions prior to Article 8 negotiation meetings.
- Meetings in other settlements will continue throughout the first year of RAP implementation, in alignment with the expropriation and construction schedules.
- **The Project will continue engaging with affected people throughout the 36-month RAP implementation period** in line with the RAP Stakeholder Engagement Action Plan for RAP.

G. PROJECT GRIEVANCE MECHANISM

38. How can stakeholders submit complaints and feedback about land acquisition to KGM?

KGM, as the authority responsible for expropriation, 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 channels**, which operate **in parallel with the Project's own grievance mechanism**.

Complaints related to expropriation, valuations, or compensation procedures carried out by KGM can be submitted **directly to KGM** through official channels, including:

- Through KGM's online grievance system: https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx
- Direct applications or petitions to **KGM 13th (Antalya) Regional Directorate** (Expropriation Department):
  - Mail or in-person application: Fabrikalar Mah. Gazi Bulvarı 07090, Kepez, Antalya, Türkiye
  - Phone: +90 242 320 70 00 Fax: +90 242 345 36 99
  - E-mail: bol13@kgm.gov.tr

In addition, stakeholders may submit grievances through the Presidency's Communication Centre (CIMER – https://www.cimer.gov.tr/ or 150). While CIMER is a national-level centralised communication platform, any land acquisition-related grievances submitted via CIMER are forwarded to and handled by KGM through internal coordination systems.

The grievances that fall under KGM's legal responsibility will be managed under **national administrative and legal procedures**, separate from the Project's grievance process.

The SPV does **not have a mandate to intervene** in grievances that fall under KGM's legal authority. If PAPs submit such complaints to the SPV, the SPV will guide them to the correct channels. When needed, the SPV will forward these complaints to KGM in writing.

39. Is there a Project-specific Grievance Mechanism and how can stakeholders submit their land acquisition-related complaints and feedback to SPV?

Yes, the **SPV has set up a Project-specific Grievance Mechanism** as part of the ESIA process, alongside the preparation of the RAP. This mechanism is used to collect and manage complaints and feedback related to the **SPV's areas of responsibility**, including RAP implementation and construction-related impacts.

This Mechanism is accessible to all stakeholders, including Project-Affected Persons (PAPs) and vulnerable individuals.

Grievances related to formal expropriation or compensation procedures under the legal responsibility of KGM and **must be submitted directly to KGM.**

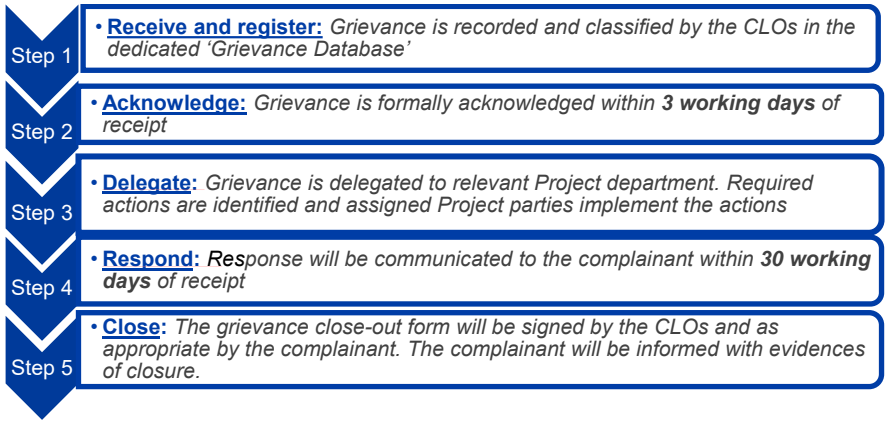
Through this mechanism, stakeholders can submit their concerns using the **channels listed below in Section H "CONTACT INFORMATION FOR STAKEHOLDERS"**

Any grievance and feedback (verbal or written) lodged or conveyed through different channels will be registered in the Project Grievance Database and managed as per the Project SEP, **by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).**

This Mechanism does not replace citizens' right to apply to other formal mechanisms including courts, CIMER) and Antalya Metropolitan Municipality's portal and call centre, among others.

40. What are the steps of the Project's Grievance Mechanism and how are complaints handled?

Key steps and timeframes of the Project Grievance Mechanism are presented below.



41. What appeal mechanisms are available if a grievance is not resolved to the satisfaction of the complainant?

If a grievance is not resolved to the satisfaction of the complainant, the Project offers an appeal mechanism. In such cases, the SPV will launch a second-tier review involving relevant authorities, third-party experts, or academics as independent parties. Based on their recommendations, the SPV will take appropriate action to resolve the grievance.

H. CONTACT INFORMATION FOR STAKEHOLDERS

Stakeholders can contact the Project and submit their questions, complaints, or feedback through the following communication channels:

Project website	**www.antalyaalanyaotoyolu.com.tr**
E-mail	**info@antalyaalanyaotoyolu.com**
Mail	**Ankara – Centre:** Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye **Ankara – Office:** Koç Kuleleri, Söğütözü Mah. Söğütözü Cad. No:2 A Blok, Kat 9, Ofis No 92 (A-9 T.H.) Çankaya, Ankara, Türkiye **Antalya – Campsite:** Taşağıl Mah. Mihrap Cad. No:20, Manavgat, Antalya, Türkiye
Phone (toll free line)	**+90 850 202 07 07**
Mobile Phone (SPV – CLOs)	**+90 534 466 49 93** **+90 534 377 92 82** **+90 537 255 65 98**
Grievance boxes and forms	Grievance and feedback boxes and forms are placed and maintained by the SPV in all affected settlements, at relevant work and mobilisation sites, and in mobile Project vehicles
Social media	**Linkedin:** https://www.linkedin.com/company/antalyaalanyaotoyolu/ **Instagram:** https://www.instagram.com/antalyaalanyaotoyolu/ **Youtube:** https://www.youtube.com/@AntalyaAlanyaOtoyolu

ANTALYA ALANYA MOTORWAY

www.antalyaalanyaotoyolu.com.tr