



REPORT

Mirny (Kazakhstan) 1GW Wind Farm Project

Land Acquisition and Resettlement Framework

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Aktas Energy LLP

Submitted by:

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Abbreviations

Acronyms	Description
AoI	Area of Influence
AP	Affected Party
BESS	Battery Energy Storage System
EBRD	European Bank for Reconstruction and Development
EIA	National Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
FGD	Focus Group Discussion
GoK	Government of Kazakhstan
GRM	Grievance Redress Mechanism
Ha	Hectares
IFC	International Finance Corporation
KII	Key Informant Interview
LRIT	Livelihood Restoration Implementation Team
LRP	Livelihood Restoration Plan
PAE	Project Affected Entity
PAH	Project Affected Household
PAP	Project Affected Persons
PR	Performance Requirements
PS	Performance Standard
RAP	Resettlement Action Plan
RoK	Republic of Kazakhstan
RoW	Right of Way
SEP	Stakeholder Engagement Plan
SS	Substation
TE	TotalEnergies

Glossary

Term	Description
Affected entity	Includes persons with formal and informal rights or title to land, and business entities that may experience either physical or economic displacement.
Affected person	Person experiencing either physical or economic displacement.
Akimat	Local executive body in Kazakhstan, functioning as the regional or district-level administration under the leadership of the Akim (Governor/Mayor). It plays a central role in governance at the region, district, city, town and village levels, with responsibilities defined by national legislation.
Area of Influence	The area likely to be affected by the Project activities and impacts.
Compensation	Any payment in cash or in kind of the replacement cost of the acquired assets.
Displaced person	Same as affected person.
Displacement (economic)	Temporary or permanent loss of assets (including land) or access to assets that leads to loss of income sources or means of livelihood as a result of Project-related land acquisition or restriction of access to land and natural resources.
Displacement (physical)	Loss of dwelling or shelter because of Project-related land access, which physically displaces and requires the affected person(s) to move to another location.
Entitlement	Range of measures comprising compensation in cash or in kind, income restoration, transfer assistance, income substitution, and relocation which are due to PAEs, depending on the nature of their losses, to restore their economic and social base.
Footprint	Land that is directly affected by the Project component.
Full replacement cost	The full replacement cost is the market value of the asset (with no depreciation) plus transaction costs.
Gender-based violence	Any form of violence, including physical and verbal abuse, related to social and cultural expectations of gender roles.
Household	One person or a group of persons who share a dwelling unit.
Involuntary Resettlement	Physical and/or economic displacement whereby affected persons or communities do not have the right to refuse land acquisition or restrictions on land use resulting in their relocation.
Land Acquisition	Purchase of property and land, including the access rights, easements and/or rights of way.
Livelihood	Livelihood is the full range of means that individuals, families, and communities utilize to make a living.
Livelihood restoration	Refers to the process of restoring (or improving) affected persons' livelihoods to pre-Project levels (or better).
Livelihood Restoration Plan (LRP)	A planning document that outlines the necessary activities and measures to be implemented to restore livelihoods.

Project-affected person	Same as affected person.
Project affected entities	Same as affected entity.
Replacement cost	Same as full replacement cost.
Resettlement Action Plan (RAP)	A planning document that outlines the process, activities, and measures to be implemented for physically displaced persons.
Transaction costs	All costs that may be incurred because of the transaction or transfer of assets, e.g., taxes, stamp duties, legal and notarization fees, registration fees, travel costs, etc.
Transition period	Transition Period means the immediate period between the sale of land by the owner to District Akimat or for the return of leased land to the government. For non-land title holders (such as workers and graziers/users), it means the immediate period where their livelihood becomes disrupted until they are able to restore their livelihoods to pre-Project levels.
Vulnerable groups	People who are at increased risk status and may experience vulnerability and discrimination stemming from their race, color, sex, language, religion, political or other opinion, national or social origin, property, or birth.

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1.0 INTRODUCTION

Aktas LLP (the Client), a partnership constituted by TotalEnergies (60%), the National Wealth Fund Samruk-Kazyna (20%), and KazMunayGas (20%), is seeking financing for the construction and operation of the 1GW wind power plant near Mirny village of Zhambyl region in Kazakhstan (hereinafter referred to as the “Project” or “Mirny project”). The Mirny project is the largest wind power plant (hereinafter referred to as the “WPP”) initiative ever developed in Kazakhstan. With a planned capacity of 1 GW, it will be built near Mirny village in the Moiunkum district of Zhambyl region. The Project will be constructed and operated by Aktas; it will feature 140 wind turbines combined with a 600 MWh battery energy storage system (BESS) to ensure a stable and reliable power supply.

The construction of the Project components in the WPP Site will take place on a greenfield site primarily used as pastures for livestock grazing, affecting formal land users (leaseholders) and informal land users, who are highly sensitive due to their dependence on land-based livelihoods.

Although no permanent physical households were identified in the WPP site during the ESIA phase, seasonal yurts used by herders for grazing have been observed within the site. Their precise locations are not yet available and may change seasonally, making it unclear whether they fall within the permanent land acquisition plots for project components inside the WPP site. Further confirmation will be provided through additional baseline data collection activities (e.g., census and asset inventory) to populate the Plan.

The ESIA baseline surveys did not cover the full alignment of the three 500 kV OHTLs, or the external access roads to the WPP site. At this stage, the Project is expected to cause economic displacement. Physical displacement is not expected, however this requires confirmation through forthcoming studies. As a result, the current LARF will need to be updated and refined using new data collected during the baseline studies for the Livelihood Restoration Plan (LRP).

As this document is being prepared, the design of certain components of the Project remains uncertain or not yet finalized. Land acquisition process is underway, with completion expected in Q1 2026. Accordingly, this Land Acquisition and Resettlement Framework (LARF) outlines the current understanding of land acquisition impacts, identifies gaps in national regulations in relation to international standards (EBRD PR5/IFC PS5), and establishes principles to ensure land is acquired according to international lenders standards and that affected persons are fully engaged.

It is understood that the Client will expand this LARF into a Livelihood Restoration Plan (LRP) based on the guidance provided in this document.

1.1 Project Background

The Project is located near the village of Mirny, in the Moiynkum District and Shu District of the Zhambyl region and Zhambil district of Almaty region, southeast part of the Republic of Kazakhstan. The Project area covers approximately 300 km².

The Project consists in developing the Mirny onshore wind farm of 1 Gigawatt (“GW”) installed capacity – combined with a Battery Energy Storage System (“BESS”) – the related Overhead Transmission Lines (“OHL”) and the necessary additional roads.

Specifically, the Project consists of the following:

- 150 Wind Turbine Generators (“WTGs”) for a total of 1 GW installed capacity and related foundations;
- Trenches for laying medium voltage (“MV”) cables of 35 kilovolt (“kV”) connecting the WTGs;

- BESS of 300/630 Megawatt-hour (“MWh”) that will be operated by Kazakhstan Electricity Grid Operating Company (“KEGOC”);
- Two Step-up substations, one to the North Mirny SS and one to the South Mirny SS of 500 kV/35 kV and the upgrade of Transmission System Operator Substations (500kV);
- Three OHLs with a total capacity of 500 kV, running between North Mirny SS and Yukgres SS, between South Mirny SS and Shu SS, and between North Mirny SS and South Mirny SS and one OHL of 35kV connecting to existing Kiyakhty SS (only temporary OHTL), to have grid connection for construction and O&M permanent compound facilities;
- Onsite roads and offsite access roads;
- Reactive power compensating devices; and
- An accommodation Camp.

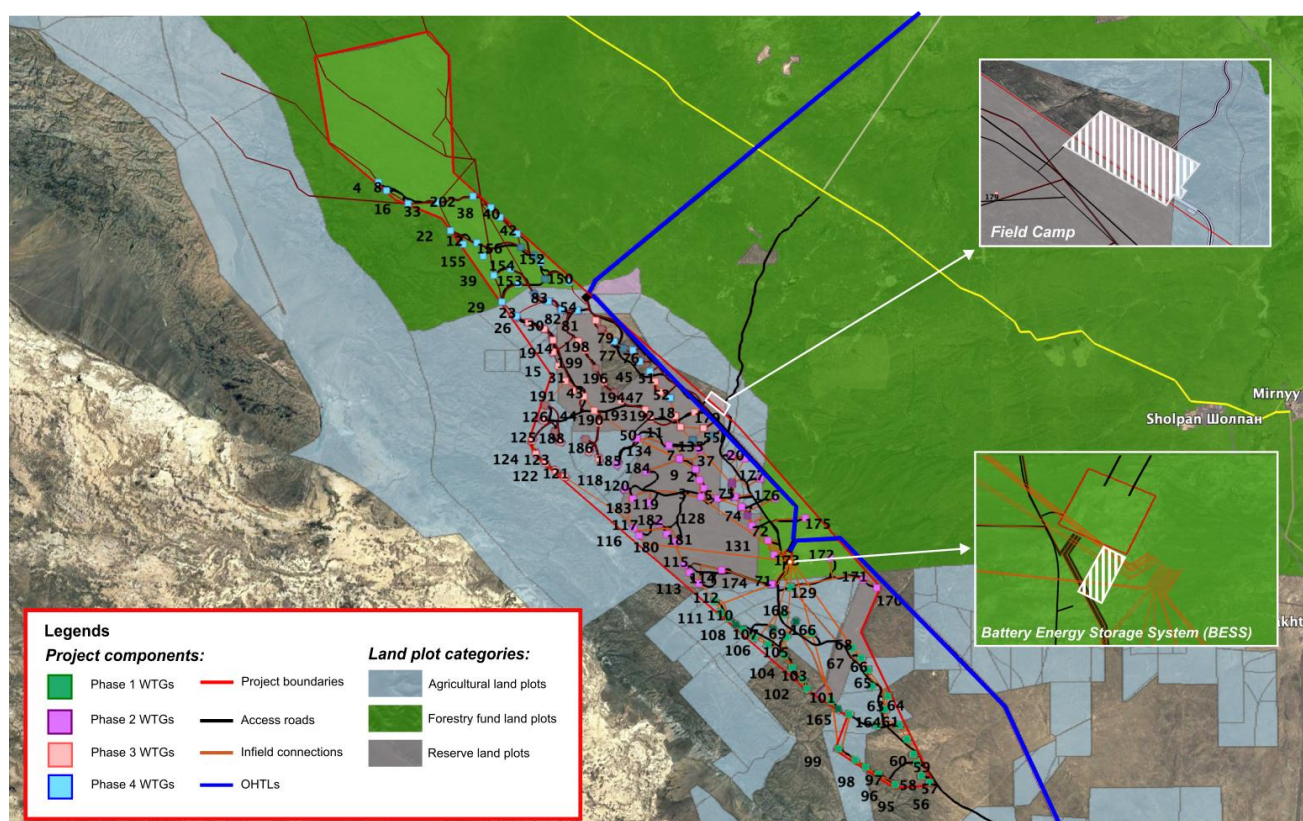


Figure 1: Project components and land category affected.

1.2 Scope of the document

As this document is being prepared, the design of certain components of the Project remains undefined or not yet finalized. In line with EBRD Performance Requirement 5 (PR5) and IFC Performance Standard 5 (PS5), this Land Acquisition and Resettlement Framework (LARF) serves as a complementary document to the land acquisition process led by the responsible government agency. Where gaps exist between national legislation and the requirements of PR5 and PS5, these are identified and addressed through specific measures/actions. In such cases, a Livelihood Restoration Plan (LRP) will be developed to ensure compliance with international standards.

The LARF (and subsequently the future LRP) is designed to address impacts on land and livelihoods, as well as any restrictions on the use of land and natural resources that may result from the construction and operation phases of the Project.

The key objectives of the LARF are to:

- Present the legal and policy framework related to land compensation;
- Provide a gap analysis comparing national legislation and government practices with the requirements of the EBRD PR5 and IFC PS5 in the land acquisition process and resettlement;
- Describe the land acquisition process carried out so far in accordance with national legislation;
- Provide a preliminary assessment of potential impacts on land and livelihoods, including associated restrictions resulting from Project facilities;
- Present stakeholder consultations carried out;
- Define the steps toward the further development of the Livelihood Restoration Plan.

2.0 LEGAL AND POLICY FRAMEWORK

This section provides an overview of the legal and institutional frameworks pertinent to land acquisition and compensation in the Republic of Kazakhstan and compares it to the EBRD PR5 and IFC PS5 standards on involuntary resettlement due to the Project.

This section begins by outlining the national legal and institutional framework, including relevant legislation, regulations, applicable procedures, and the roles of responsible government agencies. It then summarizes the applicable international standards for the Project regarding land acquisition, namely EBRD PR5 and IFC PS5, restriction on land use and involuntary resettlement.

Finally, it presents a gap analysis comparing national legislation and government practices with EBRD PR5 and IFC PS5 requirements, and identifies the actions/measures needed to bridge those gaps.

2.1 National Requirements

In the Republic of Kazakhstan, land is primarily state-owned, with provisions allowing for transfer, lease, or sale to private entities. Long-term leases up to 49 years are common, although shorter-term arrangements are available for specific needs. The state maintains the authority to reclaim private lands for public purposes, such as infrastructure development, with strict mandates to provide compensation to the dispossessed landowners.

The table below summarizes the national regulations governing land acquisition and compensation in Kazakhstan in the context of the Project.

Table 1: National Regulations Governing and Relevant to Land Acquisitions and Compensation Process in Kazakhstan

Legislation	Applicability to Land Acquisition
The Constitution of the RoK (enacted on August 30, 1995, last amended on September 19, 2022)	Establishes that land is owned by the people and managed by the State, permits private ownership within legal limits, and guarantees that land may only be expropriated for state needs under law with equal compensation.
The Land Code of the RoK (enacted on June 20, 2003, last amended and supplemented as of August 27, 2025)	Govern landownership, use rights, and acquisition procedures.

Legislation	Applicability to Land Acquisition
The Labor Code of the RoK (enacted on 23 November 23, 2015, as amended on August 25, 2025)	Relevant when employment is affected due to land acquisition operations.
The Civil Code of the RoK (enacted on December 27, 1994, last amended and supplemented as of August 31, 2025)	Governs general property rights, including the voluntary donations of land plots, waiver of ownership rights and termination of ownership.
The Social Code of the RoK (enacted on April 20, 2023, last amended and supplemented as of August 31, 2025)	Regulates legal relations related to rendering state targeted social aid to the public, including those considered falling into the vulnerable criteria.
The Forest Code (enacted on July 8, 2003, last amended and supplemented as of August 13, 2025)	Regulates the management of forest fund lands.
The Law “On Architectural, Urban Planning, and Construction Activities in the RoK” (enacted on July 16, 2001, last amended and supplemented as of August 31, 2025)	The law establishes the basic requirements for land use during the construction process.
The Law "On State Property" (enacted on March 1, 2011, last amended on June 24, 2025)	Governs the conditions for the issuance of a decree by the local executive body (akimat) when land is expropriated for state needs.
The Law “On Valuation Activity” (enacted on January 10, 2018, last amended and supplemented as of August 25, 2025)	Regulates valuation of properties subject to acquisition.
Law “On Mediation” (enacted on 28 January 2011, last amendment dated January 22, 2023)	Regulates disputes related to land plots in private ownership.
The Law “On Housing Relations” (enacted on April 16, 1997, last amendment on August 31, 2025)	States that housing must be provided when a residential structure is demolished due to the involuntary acquisition of land for state needs.
The Rules for the Transfer of Lands from the Forest Fund Category to Lands of Other Categories for Purposes Not Related to Forestry (enacted on January 28, 2015)	Sets the rules for the transfer of lands from the forest fund category to lands of other categories for purposes not related to forestry.
The Law “On Local State Administration and Self-Government in the Republic of Kazakhstan” (enacted on January 23, 2001, last amendment on September 9, 2025)	Delineates responsibilities for regional and district Akimats in the land acquisition process.
The Law “On Pastures” (dated February 20, 2017, last amended and supplemented as of June 10, 2025)	Regulates public relations related to the rational use of pastures, aimed at improving the condition of pastures and their infrastructure.

2.1.1 The Land Code

The Land Code of the RoK outlines the basis for modifying or terminating landownership and usage rights, establishing the rights and responsibilities of landowners and users.

- **Local Executive Bodies (Akimats):** Article 17 details the competencies of regional akimats in granting landownership and use rights and acquiring land for state needs;
- **Land Use Rights:** Articles 34 and 35 specify conditions under which citizens and legal entities can obtain permanent or temporary use rights to state-owned land;
- **Transfer of Rights:** Land use rights can be transferred or alienated via civil law transactions such as sale, donation, or exchange (Article 33.1);
- **Termination of Rights:** Chapter 9 addresses termination of landownership, usage and other rights for the land. Article 81 stipulates the rights of termination of private ownership of a land plot or land use rights which can include the following conditions:
 - Transfer of the land plot by the owner or the land use rights by the land user to third parties;
 - The owner's renunciation of ownership rights or the land user's renunciation of land use rights;
 - Forfeiture of landownership or land use rights in other instances provided for by the legal statutes of the RoK.
- **Compulsory Acquisition:** Acquisition of land from the owner and land use right from the land user without their consent is generally not allowed, except for the following scenarios:
 - Foreclosure on a land plot or land use rights due to the obligations of the owner or land user;
 - Mandatory acquisition of a land plot for public state needs;
 - Mandatory withdrawal of a land plot from the owner or land user if it is not being used for its intended purpose or is being used in violation of the legislation of the RoK;
 - Mandatory acquisition of a land plot from the owner or land user that has been contaminated by radioactive materials, accompanied by the provision of an equivalent land plot;
 - Confiscation.
- **Grounds for Termination:** Land use rights may be terminated due to expiration of lease periods or contract termination related to employment.
 - Expiration of the duration for which the land plot was allocated;
 - Early termination of the lease agreement for the land plot or the agreement for temporary unpaid land use, unless the land plot is under pledge;
 - Termination of employment relationships which resulted in the allocation of the service land plot to the land user.
- **Exceptional Cases for Compulsory Alienation:** Land may be compulsorily taken for state needs only in exceptional circumstances with equivalent compensation, either with the proprietor's consent or through a court ruling. "Exceptional circumstances" refers to situations where there is no alternative means to fulfill state needs (Article 84.1). One of the grounds for compulsory acquisition includes the construction or reconstruction of railroad transport infrastructure (Article 84.2.4).

If a land plot designated for state use has had its land use rights purchased from the state by the land user, they will be reimbursed for the cost of that purchase. Additionally, another land plot may be allocated in accordance with this Code and the legislation of the RoK. Conversely, if the land user has not purchased

the land use rights from the state, they may still receive another land plot in exchange pursuant to this Code and RoK legislation (Article 84.3) – Replacement plot.

Compulsory acquisition of land plots is permitted only to the extent necessary to meet state needs (Article 84.4). The process for the compulsory acquisition of a land plot for state purposes must be conducted transparently. A decision by the Government of Kazakhstan (GoK) or a local executive authority to initiate the compulsory acquisition must be published in national or local media, including the online platforms of the relevant executive bodies, within three working days of its issuance (Article 84.6).

- **Publicity and Notification:** The process of compulsory alienation must be publicized, and landowners must be officially notified about the acquisition decision (Article 85 of the Land Code, and Chapter 6, Article 63 of RoK Law on State Property).
- **Remaining Unviable Land from Fragmented Land Plots:** If the remaining portion of the land becomes unviable and can no longer be used for the intended purpose, then the entire plot must be purchased (Article 86.1).
- **Compensation Framework:** Amounts, methods, and timing of compensation are detailed in the Law on State Property (Article 87); compensation could cover land cost, asset value, development expenses, and possible income loss (Article 166.2). In calculating the amount of compensation, the following elements shall be considered:
 - the value of the land or land-use rights;
 - the market value of any assets located on the land, including fruit trees and perennial plantings;
 - the cost of expenditures related to land development, maintenance, implementation of protective measures, and soil fertility improvement, adjusted for inflation;
 - all losses incurred by the owner or land user as a result of the land acquisition at the time of the termination of ownership or land-use rights, including losses resulting from the early termination of their obligations to third parties; and
 - loss of income.

The Land Code establishes base rates of payment for land plots and the cadastral value of land to determine the cost. These base rates are set by joint decisions of the regional representative and executive authorities when the plots are transferred to private ownership. The payment rates for land use must be at least equal to the applicable land tax rates. The fee for selling the right to lease differs from the cadastral (estimated) value of a specific land plot (Article 10.1).

The cadastral value of a land plot (estimated) is determined by a specialist “Valuator”, which oversees the state land cadastre per Akimats. This valuation is based on the established base rates for land plots transferred to private ownership and includes corrective (increasing or decreasing) coefficients to account for inflation, land conditions, and location (Article 10.2).

The number of losses and subsequent compensation is established through an agreement between the parties involved (Article 166.3). If a consensus cannot be reached, the land cannot be acquired until a court resolution is obtained (Article 166.7). Disagreements about compensation can lead to court cases, with mediation allowed.

- **Dispute Resolution:** Disputes related to land plots in private ownership may be resolved through mediation if agreed upon by both parties (Article 167, in accordance with the Law “On Mediation” #401-IV, adopted on 28 January 2011, last amendment dated January 22, 2023).

If the owner or land user contests the decision to acquire their land for state needs or disagrees with the compensation amount or other acquisition terms, the local executive authority that approved the acquisition may initiate an expropriation case (Article 88.1). This can be done after a three-month period from the date the owner or land user receives notification but must occur before the deadline specified in the acquisition decision (Article 88.2, along with Article 65.12 of the RoK Law on State Property).

Civil cases regarding claims for the acquisition of land for state needs will be reviewed and resolved within one month from the completion of trial preparations (Article 88.3).

- **No Compensation for Informal or Unregistered Occupants:** The Land Code excludes squatters or unregistered land claimants from receiving compensation.
- **Reclamation Rights:** Article 164-1.1 establishes that the owner of a land plot or a land user has the right to reclaim their land from any illegal possession. Article 164-1.2 further states that the reclamation of an illegally occupied land plot, which is part of state-owned lands not designated for land use, is to be conducted by local executive bodies at the location of the plot.
- **Penalties for Illegal Occupation:** The illegal occupant must vacate the illegally occupied land within thirty (30) calendar days following the imposition of penalties as outlined in the Republic of Kazakhstan's legislation on administrative offenses. They are also required to demolish any structures built (or under construction) on the plot, either independently or at their own expense, unless otherwise specified by civil legislation in the RoK. Disputes arising from the illegal occupant's failure to vacate the land or demolish the structures will be resolved in court. If an unauthorized construction is transferred to municipal ownership, the individual responsible for the construction will be reimbursed for the construction costs as determined by the court (Article 164).
- **Rights of employees in privatized agricultural organizations:** Under Article 103, it states that employees of privatized state agricultural organizations, as well as pensioners and people engaged in the production and sociocultural spheres of service of these organizations and who reside in their territories, are eligible for a conditional land share.

Compensation for losses of agriculture production: Article 105 states that loss of agricultural production caused by the removal of agricultural land for their use for purposes not related to agriculture must be reimbursed to the budget in order to maintain the level of agricultural production by restoration of agricultural lands and their quality. The article further elaborates how the compensation is calculated and the eligibility for compensation. Article 106 elaborates that reimbursable losses are determined based on standards that ensure the development of new land or land improvement to the level of agricultural production on them in the amount not less than obtained on lands withdrawn or received previously to reduce their quality. Reimbursed agriculture land on replacement plot should be of same or higher quality than the previous agriculture land that was acquired.

- **Temporary land use rights:** Article 12 states 6) the right of temporary use by the parcel of land which is in private property - the right of the subject to own and use the parcel of land, evolving from the agreement on temporary use by the parcel of land between the owner of the parcel of land and the temporary user (the lessee or the non-paid user); and 17) the land use right - the right of person to own and use the parcel of land which is in state-owned property is termless (permanent land use) or during certain term (temporary land use) on paid and (or) non-paid basis; and 31) "secondary land users" (persons who acquired the right of temporary land use on the basis of the agreement on secondary land use from primary land user reserving this status.

2.1.2 The Labor Code

The Labor Code of the RoK stipulates that registered employees who are terminated due to the employer's cessation of operations are entitled to compensation equal to one month's average salary (Article 131). The employment contract, collective agreement, or specific employer policies may offer a higher compensation amount in cases of job loss.

2.1.3 The Civil Code

- **Waiver of Ownership Rights:** According to the Civil Code of the RoK, individuals or legal entities can voluntarily waive their ownership rights to property through a verbal or written declaration, or by actions indicating their intention to relinquish possession, use, and disposal of the property. The waiver must be lawful and does not terminate the owner's rights and obligations regarding the property until another party acquires ownership (Article 250).
- **Termination of Ownership:** The termination of ownership rights for real estate by a state decision, not specifically aimed at acquiring the property, is only permissible under certain legal conditions that provide equivalent property or full compensation for losses incurred. If the owner disputes the termination, it cannot proceed until the issue is resolved in court, including matters of compensation for losses (Article 255).
- **Donations:** Article 516 defines a donation as a gift of property or rights intended for public benefit. Donations can be made to various entities, including individuals, educational and medical institutions, charities, cultural organizations, and the state, without requiring additional permissions for acceptance.

2.1.4 The Social Code

The Social Code of the RoK, outlines provisions for targeted social assistance in Kazakhstan, addressing several vulnerable groups including low-income families, elderly households, and those headed by women.

The law outlines targeted social assistance eligibility for individual and families who qualify as low-income, and unconditional cash assistance for single and lonely low-income individuals, including:

- Elderly individuals who have reached the retirement age;
- Disabled persons;
- Households without able-bodied members or where the only able-bodied member is caring for dependents (children, elderly, or disabled individuals).

2.1.5 The Forest Code

The Forest Code regulates issues related to the management of forest fund lands. In particular, Article 51 of the Code regulates the transfer of lands of the state forest fund to lands of other categories for purposes not related to forestry, and/or the withdrawal of lands of the state forest fund for state needs.

The transfer of lands of the state forest fund to lands of other categories for purposes not related to forestry, and/or the withdrawal of lands of the state forest fund for state needs shall be carried out by the Government of the Republic of Kazakhstan in accordance with the Land Code of the Republic of Kazakhstan.

The transfer of lands of the state forest fund to lands of other categories for purposes not related to forestry is permitted only in exceptional cases, subject to a positive conclusion of the state environmental review, in accordance with the requirements of the forest and land legislation of the Republic of Kazakhstan, on the basis of forest management and land management materials, and only in connection with:

- the creation and expansion of specially protected natural areas;
- the fulfillment of international obligations;

- the discovery of mineral deposits beneath the plot, where no alternative options for their development exist;
- the construction of motor roads and railways of international, republican, regional, and district significance, power transmission lines, communication lines, and main pipelines;
- the modification of the boundaries of settlements, where no alternative options for their placement exist;
- the construction of facilities of the State Border of the Republic of Kazakhstan and facilities for defense needs;
- the construction and operation of strategic water management and hydraulic structures, where no alternative options for their placement exist.

In cases of land transfer from the forest fund as provided above, the persons in whose favor the land is transferred shall carry out compensatory planting of forest crops in an area double the size of the transferred plot and shall maintain such forest crops during the first three years after planting, on land plots provided by the respective local executive bodies as compensation to the state forest owner for subsequent inclusion into the state forest fund.

When transferring lands of the state forest fund to lands of other categories for purposes not related to forestry, and/or withdrawing lands of the state forest fund for state needs, individuals and legal entities in whose interests such transfer and/or withdrawal is carried out shall reimburse losses and damages to forestry production in the manner established by the authorized body.

When transferring lands of the state forest fund to lands of other categories for purposes not related to forestry, and/or withdrawing lands of the state forest fund for state needs, issues shall simultaneously be decided regarding the preservation or felling of plantations located on such lands, as well as the use of timber obtained in the event of felling.

2.1.6 The Rules for the Transfer of Lands from the Forest Fund Category to Lands of Other Categories for Purposes Not Related to Forestry

The Rule sets the procedure for the transfer of lands from the forest fund category to lands of other categories:

Stage 1: The applicant (Client), at the location of the requested land plots, submits an application in free form to the local executive body of the region (akimat).

Stage 2: Within 5 working days from the date of receipt of the application, the akimat forwards a copy of the application to the state forest owner, indicating the deadline for preparing an act on the selection of a forest fund land plot in the form provided in the annex to these Rules.

Stage 3: The state forest owner, together with the applicant, prepares an act on the selection of a forest fund land plot, attaching a copy of the forest map (plan) indicating the boundaries of the requested land plot, and sends it to the akimat.

Stage 4: Upon receipt of the act on the selection of the forest fund land plot with the attached copy of the forest map (plan), the akimat organizes public hearings on projects concerning the transfer of forest fund lands.

Stage 5: After holding public hearings, the akimat establishes a special commission (hereinafter referred to as the "Commission") to consider the issue. The working body of the Commission is the structural subdivision of the local executive body performing functions in the field of forestry (hereinafter referred to as the "working body"). The Commission includes representatives of:

- the local representative body of the region, city of republican significance, or the capital;
- the territorial subdivision of the authorized body in forestry and wildlife;

- the structural subdivision of the local executive body responsible for land relations;
- the state forest owner;
- the local executive body for architecture, urban planning, and construction;
- the working body;
- the territorial subdivision of the authorized body for environmental protection.

Stage 6: The Commission, within 30 calendar days from the date of receipt of the application, issues a reasoned written positive or negative conclusion on the transfer of land plots and sends it to the akimat.

The conclusion takes into account the results of the public hearings, indicates the purposes of the transfer of forest fund lands, and addresses the preservation or felling of plantations.

If felling is required, the felling is carried out by the forest owner under a contract with the applicant; the timber obtained is transferred to the balance of the forest owner.

The conclusion of the Commission is prepared in two copies in the form of a protocol decision. If the conclusion is negative, the local executive body issues the applicant a written reasoned refusal in the form of a letter.

Based on the Commission's positive conclusion, the working body prepares the materials for the transfer of lands of the state forest fund to lands of other categories for purposes not related to forestry. These materials include:

- Petition of the interested person addressed to the local executive body;
- Act on the selection of the forest fund land plot;
- Copy of the forest map (plan) at a scale of 1:10000;
- Calculation of compensation for losses and damages to forestry production caused by the withdrawal of forest fund lands, prepared by the forest owner;
- Written consent of the forest owner;
- Written consent of the state body supervising the forest owner;
- Written consent of the territorial subdivision of the authorized forestry and wildlife body;
- Written consent of the local executive body for architecture, urban planning, and construction, in cases involving changes to settlement boundaries;
- Written consent of the relevant local executive body's subdivision responsible for land relations at the location of the land plot;
- Positive conclusion of the Commission;
- Explication of the requested land plot;
- Map of the requested land plot with detailed layout of facilities, approved and signed by the heads of relevant organizations;
- Decision of the public hearings;
- Copy of the subsoil use contract, in cases of transfer related to mineral extraction;

- Joint resolution of regional representative bodies when expanding towns of district significance, or of district/local representative bodies when expanding settlements and villages;
- Copy of the relevant document in cases of transfer connected to the fulfillment of international obligations;
- Pre-project or project documentation in cases of construction of motor roads and railways of international and republican significance, power transmission lines, communication lines, and main pipelines;
- Draft agreement with the state forest owner on compensatory planting of forest crops in an area double the size of the transferred plot, and maintenance of the crops for the first three years after planting, in cases of subsoil use or infrastructure construction;

Stage 7: Based on the prepared materials, the akimat issues a resolution approving the transfer of forest fund lands. Within 10 working days, it forwards the resolution and the materials (as listed in paragraph 12 of these Rules) to the authorized body in forestry and wildlife for approval.

Stage 8: The authorized body, within 15 working days from receipt of the materials, provides the akimat with a response on the results of the approval.

If the materials are returned for revision, the applicant, after making corrections, submits the revised materials to the local executive body for re-submission to the authorized body.

Stage 9: If the authorized body gives positive approval, the akimat, within 10 working days, sends the materials to the central authorized body for land resources management, for preparation of a draft Government Resolution of the Republic of Kazakhstan on the transfer of forest fund lands to lands of other categories for purposes not related to forestry.

The central authorized body for land resources management, within 1 month from receipt of the materials, prepares the draft Government Resolution and forwards it to the authorized body for environmental protection for state environmental review, in accordance with the legislation of the Republic of Kazakhstan.

If the central authorized body for land resources management returns the materials for revision, the applicant, after correcting the deficiencies, resubmits the revised materials to the akimat for re-forwarding.

Upon receiving a positive conclusion of the state environmental review, the central authorized body for land resources management finalizes the draft Government Resolution in the prescribed manner and submits it to the Government of the Republic of Kazakhstan for adoption of the final decision on the transfer of lands of the state forest fund.

2.1.7 The Law “On Architectural, Urban Planning, and Construction Activities”

Article 68 of the Law establishes the basic requirements for land use during the construction process. At the relevant stages of construction, the procedures and requirements set forth in this Article must be carried out and observed:

- A developer intending to construct a facility is obliged, in accordance with the land legislation of the RoK, to obtain from the akimats of districts (cities) a decision granting the appropriate land-use right. If the developer already holds the relevant land-use right and the functional zoning in accordance with the approved detailed planning project for the construction of the facility, no additional decision from the local executive bodies of districts (cities) is required.
- Construction and installation works on a facility are permitted only on lands for which the appropriate land-use right or private ownership right has been granted in accordance with the legislation of the RoK.
- Design, construction, and maintenance of engineering infrastructure (roads, bridges, power transmission lines, and other utilities) for tourism facilities located on specially protected natural territories of republican

and local significance, as well as to tourism facilities and tourist accommodation sites located outside settlements, are allowed, taking into account animal migration routes, without granting land-use rights or private ownership rights. This is done on the basis of an agreement on the long-term use of plots of specially protected natural territories for the design, construction, and maintenance of engineering infrastructure for tourism facilities, concluded with the environmental protection organization.

- The agreement on the long-term use of plots of specially protected natural territories for the design, construction, and maintenance of engineering infrastructure (roads, bridges, power transmission lines, and other utilities) for tourism facilities shall be concluded on the basis of a standard agreement approved by the GoK.
- The agreement on the long-term use of plots of specially protected natural territories for the design, construction, and maintenance of engineering infrastructure (roads, bridges, power transmission lines, and other utilities) for tourism facilities shall specify the types of works to be carried out, the deadlines and conditions for their implementation, environmental requirements for environmental protection, measures for the reclamation of disturbed lands, and the deadlines for their implementation.
- The local executive bodies of the capital, cities of republican significance, and districts (cities of regional significance), based on the decision granting the appropriate land-use right or the land-use right already held by the developer, issue to the developer an architectural and planning assignment with technical specifications for connection to sources of engineering support and utilities, as well as an architectural concept for the construction of the facility.

Article 37.3 of the Law states that the state urban planning cadastre is used to establish the size of land and real estate taxation, to regulate the legal turnover of real estate, to monitor the rational use of settlement territories, to ensure compliance with urban planning regulations, and to analyze the implementation of projects.

Article 54 of the Law states that zones designated for agricultural use within the boundaries of a settlement are intended for agricultural activities and may be used for this purpose until their use is changed in accordance with the approved master plan of the settlement.

2.1.8 The Law “On State Property”

The Law “On State Property” establishes the legal regime for state property management and the rights related to state property acquisition and termination.

- **Equivalent Compensation:** The determination of compensation for the value of a land plot acquired for state purposes, as well as any property situated on it (if applicable). The compensation is intended to restore the conditions of use for both the land plot and any assets located on it to what they were before the acquisition (Article 62-1.1). When a land plot is obtained for state needs, equivalent compensation must be provided to the owner or non-state land user (Article 62-1.2). Compensation types include:
 - Providing another land plot or property;
 - Paying the market value of the acquired property (Article 62-1).
- **Compulsory Alienation:** Such alienation is limited to what is necessary for state use (Article 62.4) and must be conducted under specific conditions. Article 62-2 outlines the conditions for providing an equivalent land plot or immovable property in exchange for land acquired for state purposes. When offering an equivalent plot to the owner or non-state user, factors such as the location, intended use, and area of the alienated land, as well as any incurred losses, must be considered. Article 62-2.1 states that the equivalent land provided must be located within the same settlement as the alienated plot. The value of the state-owned land offered in exchange is assessed at market value by a valuator based on the valuation of the

alienated land (Article 62-2.4). If the alienated land has a higher value than the exchanged plot, the owner will be compensated for the difference (Article 62-2.5).

- **Notification and Process:** Upon compulsory acquisition, the government must issue a decree detailing the acquisition purpose and specifics, which must be published in national or local mass media and sent to the property owner within three days (Articles 63.2 & 64.1). The decree must include the following details:
 - The purpose and justification for the compulsory acquisition;
 - The location, size, and cadastral number of the land plot;
 - The name of the property owner or private land user;
 - The date of compulsory acquisition, which must be at least three months after the decree is officially published,
 - The location where the landowner or land user can apply for conciliation procedures.
- **Owner's Rights and Registration Process:** Owners are allowed time to register their property rights and to review and respond to acquisition notices (Article 64.4). If the right of private ownership of a land plot is not registered according to the legislation of the Republic of Kazakhstan, the owner may arrange to register their ownership following the decree's adoption. The compulsory acquisition period specified in the decree cannot be extended by more than one year (Article 63.7).

The acquiring authority must notify the owner or land user in writing about the compulsory acquisition within three calendar days of the decree's publication. This notification must include a draft purchase agreement related to the land plot's seizure and be sent by mail with a mandatory receipt confirmation. If the receipt notice is not received, the documents must be resent (Article 64.1).

The owner or non-state land user is granted at least fifteen calendar days from the date of receipt to review the notice and submit copies of their title and identification documents related to the land or property (Article 64.4). Additionally, the notice of compulsory acquisition is required to be registered in accordance with the RoK Law on the "State Registration of Rights to Real Estate" (Article 64.5).

- **Transfer Process:** Actual transfer of property occurs after compensation is paid, and rights must be registered. Local authorities evaluate properties for state needs and prepare agreements accordingly (Articles 65.1 & 65.6). The termination of private property rights and land use rights, as well as the state's rights to land, must be registered with the relevant authority, accompanied by either the purchase agreement or a court decision (Article 65.4).

Within one month of receiving copies of the title and identification documents for the alienated property, the local executive body must evaluate the property. If the owner or non-state land user fails to provide these documents, the local body may request them from authorized state agencies (Article 65.5). Based on the property evaluation, the local executive body will prepare a draft acquisition contract within ten working days and send it to the owner or non-state land user via mail with a required delivery receipt. If the receipt is not acknowledged, the documents must be resent (Article 65.6).

Upon receiving the draft agreement, the owner or non-state land user has twenty calendar days to express written agreement or disagreement, submitting their response to the local executive body (Article 65.10).

The local executive body must then present the draft acquisition agreement to the relevant local representative body within one month of receiving the owner's written acceptance. The acquisition agreement is reviewed by the standing commission of the local representative body within two weeks, with the owner and other affected parties invited to attend. Once an agreement is reached, it will be approved

by the executive body in coordination with the local representative body and signed by the owner or non-state land user (Article 65.11).

- **Dispute Resolution:** If disputes arise over the acquisition resolution and/or a refusal to conclude an agreement on the acquisition of the land plot for public use after three months from the date of receipt of the written notice, local authorities can file lawsuits to enforce compulsory acquisition, and civil claims are to be resolved promptly within one month from the date of completion of the preparation of the case for trial (Article 65.12).
- **Alienation Agreement Requirements:** The alienation agreement must include (i) parties involved and affected rights, (ii) identification details of the land or property, (iii) termination of relevant rights, (iv) legal cost of the acquired land, (v) amounts to reimburse for losses due to compulsory acquisition, (vi) payment terms for the acquired property, (vii) transfer timeline for the property, and (viii) financing procedures for acquisition costs (Article 65.7).
- **Owner's Rights and Incurred Expenses:** Owners or non-state users can use their property and incur related expenses until an agreement or court decision is finalized. Owners bear the risk for costs related to construction during this period; if part of the land plot cannot be used as intended after acquisition, the entire plot may be alienated (Article 66.1).
- **Transfer of Rights to Another During Acquisition Process:** If real estate rights are transferred to another person during the specified time, either through acquisition or other means, the compulsory alienation procedure for land or property related to state needs applies to the new rights holder (Article 66.2).
- **Valuation, Cost Determination and Compensation:** The law requires full compensation for property acquired for state needs, with methods of calculation and payment terms specified (Articles 67-68).

The cost of land for state needs is based on market value, with adjustments for unpaid amounts if sold in instalments (Article 67.1). The market value applies to both land plots and any immovable property on them, irrespective of how rights to the land arose (Article 67.2).

The valuator determines the market value as of the date of valuation for any land or property related to public use acquisition (Article 67.3). Compensation covers property value and damages incurred due to compulsory acquisition. Compensation for others affected by compulsory acquisition is based on the losses they will incur due to the acquisition (Article 67.4).

- **Reimbursement Provisions for Land Alienation:** Compensation for the cost of land or real property alienated for state needs must be fully reimbursed before the ownership rights transfer to the RoK or its administrative units (Article 68.1). Reimbursement is sourced from the budget (Article 68.2).

Agreements for non-cash compensation are permitted between the RoK or local authorities and property owners, formalized in a written purchase agreement (Article 68.3). Compensation must be paid within 1 month of signing the purchase agreement or from the date of a court decision (Article 68.4).

Compulsory alienation of land or property for state needs does not allow for payments in instalments (Article 68.5).

- **Donation Agreements:** The law discusses property acquisition via donation agreements, outlining the process for transferring land from private to state ownership based on specific legal requirements (Article 27).

2.1.9 The Law “On Valuation Activity”

The Law “On Valuation Activity in the RoK” establishes regulations related to property valuation.

- **Mandatory Valuation Requirement:** Article 6 specifies that a mandatory valuation must be conducted in instances of property acquisition and alienation for state needs.
- **Licensing of Appraisers:**
 - Appraisers, both individual and legal entities, must be licensed to engage in valuation activities (Article 4).
 - To obtain a license, individuals must pass a qualification examination which assesses their qualification level. This examination is managed by a qualification commission, which includes representatives from Chambers of Appraisers. The rules for this examination are approved by the authorized body (Article 20).
- **Valuation Standards:** Outlines valuation standards for valuing movable and immovable property, real estate, intellectual property, and intangible assets.
 - Details methodological guidance on valuation approaches such as the income approach, cost approach and comparative approach.
 - Offers specific guidelines for assessing market value, investment value, and liquidation value.
- **Market Value:**
 - Market value is defined as: ‘the estimated amount of money for which an asset would have been exchanged on the valuation date between an interested person and the seller as a result of a commercial transaction after proper marketing, in which each of the parties would have acted with knowledge, prudence and without coercion.’
 - Market value is recommended to be determined by using the comparative approach, which involves comparing the property in question with similar properties that have recently been sold under comparable conditions. Adjustments may be made for any differences that could affect the price, such as location, size, or condition.

2.1.10 The Law “On Housing Relations”

The Law “On Housing Relations” states that housing must be provided when a residential structure is demolished due to the involuntary acquisition of land for state needs. Property owners can choose between being offered a well-maintained replacement residence or receiving compensation equal to the market value of the demolished house. If the replacement property is valued to be higher than the demolished house, the owner incurs no additional costs. If the replacement property is lower in value, the owner will be compensated for the difference in cost.

2.1.11 The Law “On State Administration and Local Self-Government”

The Law “On State Administration and Local Self-Government” outlines the competencies of regional and district Akimats (local executive bodies) in Kazakhstan.

- **Regional Akimat Responsibilities:**
 - Performs regulatory, implementation, and control functions to address local issues.
 - Manages land relations in line with national land legislation.
 - Incorporates land development and use measures into local development programs.
- **District Akimat Responsibilities:**

- Facilitates the enforcement of the Constitution, laws, and various acts at both central and local levels.
- Manages land relations according to national land legislation.

2.1.12 The Law “On Pastures”

The Law “On Pastures” emphasizes rational use of pastures, accessibility for individuals and legal entities, public involvement in activities related to pastures, and participation in management.

The law highlights the government’s role, through the Akim’s of town of district significance, settlement, village, rural district in developing, together with District Akimats, pasture management plans that provide pasture lands for individual and (or) legal entities that lack pastures (Article 13), provide pastures for peasant households or farming, as well as for agricultural production (Article 14), provide pastures within the territory of settlements and rural areas in state ownership land to meet the needs of the local populations (Article 15), and provide location for distant pastures, if necessary (Article 16).

2.1.13 The Law “On Appraisal Activity”

The Law “On Appraisal Activity in the RoK” informs that only in cases of acquisition and alienation of property for state needs it is necessary to conduct a mandatory valuation (Article 6).

2.2 Applicable Standards (EBRD Environment and Social Requirements 5 and IFC Performance Standards 5)

The land acquisition and resettlement processes are managed by the government and therefore overseen by Kazakhstan’s national land acquisition authority responsible for land expropriation. However, since the Project will be financed by lenders, it must comply with their requirements. Consequently, the assessment of involuntary resettlement impacts and the development of this Livelihoods and Resettlement Framework (LARF) have been informed by:

- EBRD Performance Requirements 5 (PR 5): Land Acquisition, Involuntary Resettlement and Economic Displacement (2019);
- Guidance Note to EBRD Performance Requirements 5 (PR 5): Land Acquisition, Involuntary Resettlement and Economic Displacement (March 2023);
- IFC Performance Standard 5 (PS 5): Land Acquisition and Involuntary Resettlement;
- IFC Guidance Note 5: Land Acquisition and Involuntary Resettlement (August 2012);
- IFC Good Practice Handbook: Land Acquisition and Involuntary Resettlement (December 2023).

2.3 Gap Analysis between the National Legislation and EBRD Environment and Social Requirements 5 & IFC Performance Standards 5

Legend

Fully aligned	National legislation fully aligns with EBRD PR5/IFC PS5 requirements
Partially aligned	National legislation partially aligns with EBRD PR5/IFC PS5 requirements
Not aligned	National legislation is not aligned with EBRD PR5/IFC PS5 requirements

Table 2: Gap Analysis between National Legal Framework and EBRD PR5/IFC PS5

Themes	EBRD PR5/IFC PS5	National Legislation	Gaps Identified	Gap resolution
Project Design	To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs.	<p>The Law “On Architectural, Town-Planning and Construction Activities” does not require consideration of avoidance, and when avoidance is not possible, minimize displacement by exploring alternative project designs.</p> <p>The Environmental Code of the RoK mandates the following requirements for the National EIA:</p> <ul style="list-style-type: none"> Article 50.3 of the Code establishes the principle of alternatives: the EIA must be based on the mandatory consideration of several alternative options for implementing the proposed activity or developing the document, including the option of 	<p>Partially aligned:</p> <p>Although there is no requirement under Law “On Architectural, Town-Planning and Construction Activities” for the consideration of project design alternatives, there is a requirement under the Environmental Code of the RoK to consider the principle of alternatives during implementation of the EIA. However, there is no mention of minimization or avoidance of displacement.</p>	Principle of alternatives have been considered in the Alternative analysis Chapter of the ESIA and Impact assessment has been carried out during national EIA and ESIA.

		refusal to implement ("zero option).		
Community Engagement	The client will engage with Affected Communities (AC), including host communities, through the process of stakeholder engagement. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of AC 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 EBRD PR5/IFC PS5.	<p>No specific provision mandating public consultations or disclosure in resettlement and livelihood restoration context, except:</p> <ul style="list-style-type: none"> Public hearing must be conducted during the national EIA. Public hearing must be conducted during the process of changing category of forest fund lands into different categories. 	<p>Partially aligned:</p> <p>National legislation does not address specific requirements for community engagement during resettlement and livelihood restoration processes. However, mandates public hearings for National EIA report and during the process of changing category of forest fund lands into different categories.</p>	<p>Public consultations were conducted as a part of the national EIA.</p> <p>Public hearings were conducted during the process of changing the category of forest fund lands into different categories.</p> <p>Stakeholder engagement will be carried out with affected landowners and formal and informal users during the planning, implementation, monitoring, and evaluation of compensation payments and livelihood restoration activities.</p>
Information Disclosure and Consultation	Stakeholder engagement is a continuous and ongoing process whereby stakeholders need to be systematically informed and consulted during the preparation of the resettlement plan about options and rights. Regular meetings between project officials and communities should be provided for	According to the laws applicable during land acquisition activities for project, the landowners and users must be notified in writing (Article 85 of the Land Code). Contracts must include conditions for compensation of losses related to resettlement (Article 44.7 of the Land Code). The residents must be informed about construction/reconstruction plans through the media, at public hearings. However, this is not specific to	<p>Partially aligned:</p> <p>The Land Code has several provisions to send notices to <u>formal</u> titleholders during disclosure and consultation and the process of land acquisition.</p>	The Client will build effective community engagement through disclosure of the Project-related information and consultation with local communities on options and rights regarding land acquisition impacts. Informal titleholders and land users will be included in consultations.

	villagers and hosts to communicate their concerns about the resettlement program to project staff throughout planning and implementation.	resettlement or expropriation but pertains to general construction plans.		
Socio-Economic Research and Surveys, Census, Inventory of Affected Assets	Carry out a census of project-affected people, an inventory of affected assets and a detailed measurement survey, including land, structures and other physical assets attached to the land, as well as other resources, such as formal and/or informal sources of livelihood and modes of income generation, and other natural resource-based activities and employment	Specific socio-economic baseline assessment related to land acquisition process is not required as well as detailed census on affected people. The state land cadastre provides the system of information on natural and economic lands' condition of the RoK, on location, intended purpose, sizes and boundaries of the land plots, their qualitative characteristic, records of land use and cadastral value of the land plots, and other necessary information. The state land cadastre also includes information on rights holders of land plots. Environmental Code of the RoK requires baseline determination of the state of ecosystems and ecosystem services for those ecosystems that will be affected by the proposed activities of individuals and legal entities within national EIA procedure.	Partially aligned.	Aktas will conduct comprehensive socio-economic research and surveys at household level, census, inventory of affected assets and will address outcomes in LRP.
Vulnerable Groups	Requires identification of vulnerable groups, and development of targeted measures so that impacts do not disproportionately affect them.	No specific requirements to identify and assist vulnerable groups.	Not aligned: ■ No requirement to identify vulnerable groups.	According to IFC PR5/ PS5, vulnerable groups must be identified and meaningfully included throughout the land acquisition and resettlement process. Livelihood restoration measures will be implemented to ensure that

	The client will undertake the necessary actions to ensure they are not disadvantaged in the resettlement process, are fully informed and aware of their rights and able to benefit equally from the resettlement opportunities and benefits.		<ul style="list-style-type: none"> No special assistance or considerations for vulnerable groups. 	these groups are not disproportionately impacted by land acquisition, aiming to restore or improve their pre-Project living standards.
Consideration of Gender Aspects	Gender sensitive approaches will be integrated throughout all stages such as inclusive consultations (with support like childcare, transport, and women-only meetings when needed), analysis of gender differentiated impacts of land acquisition and resettlement and gender aware compensation to consider women's role, alternative compensation methods and where property rights are not recognised to women ensure land tenure for them.	No requirements to consider gender aspects during the development of the project, including during the land acquisition process.	Not aligned.	Aktas will address gender aspects with a gender sensitive approach within the LRP.
Grievance Mechanism	The client must establish a grievance redressal mechanism (GRM) as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse	<p>No requirement for dedicated project-specific grievance mechanism during development phase.</p> <p>Grievances can be addressed by local community to relevant executive authorities via national electronic grievance redressal system – EOTinish.kz</p>	<p>Partially aligned:</p> <p>No project- specific GRM required during project development phase, however local communities can address grievances to relevant executive authorities.</p>	Aktas will develop comprehensive GRM in coordination with local akimats.

	mechanism designed to resolve disputes in an impartial manner.			
Establishment of a Cut-off Date	A "cut-off date" refers to a specific date established by a project developer to determine who is eligible for compensation related to land acquisition and displacement.	No specific requirements identified with respect to the establishment of an eligibility cut-off date. The decrees can be considered a method of formal disclosure, with respect to transactions on the land. However, there is no specific cut-off date requirements to assess enumeration of land.	Not aligned: There is currently no requirement to establish a cut-off date for eligibility that is linked to the census and asset inventory process.	Aktas will establish its own cut-off date at the conclusion of the census and asset inventory process. Ideally, this cut-off date should be formalized through a legal act issued by the local akims (mayors) of the relevant districts. However, setting the cut-off date immediately after the census and full asset survey may result in excluding individuals who use the Project area on a seasonal basis (e.g., herders). Therefore Aktas will engage the representatives and community networks to locate and identify seasonal or nomadic groups that may not have been present during the fixed census date
Valuation of Affected Lands and Assets	Valuation must be at full replacement cost and will be performed by qualified valuers. Where inflation is	The Law "On Valuation Activity in the RoK" establishes the framework for property valuation:	Not aligned: National legislation focuses on market value, whereas EBRD PR5 ¹ /IFC PS5 requires that any	The valuation method for determining replacement cost will be documented and included in LRP.

¹ According to EBRD PR5, the replacement cost is usually calculated as the market value of the assets plus the transaction costs related to restoring such assets. The calculation of replacement costs is complex due to the potential variety of land, land use claimants, and the differing levels of land market development across member countries. For this reason clients should identify and consult with all

	high or the period of time between calculation of compensation rates and delivery of compensation is extensive, planned compensation rates will require updating	<ul style="list-style-type: none"> - mandatory valuation is required for property acquisition and alienation for state needs. - market value is defined as the price agreed between informed buyer and seller in an open market transaction, typically determined by the comparative approach. 	compensation be calculated at "full replacement cost." Full replacement cost is current market value plus transaction costs and land preparation costs (for agricultural land) and does not include depreciation.	
Compensation and benefits for displaced persons	Compensation of privately-owned land is based on full replacement cost.	Compensation of privately-owned land is based on market value at the time of appraisal, with no consideration of other losses that may be incurred.	Partially aligned.	<p>Aktas will:</p> <ul style="list-style-type: none"> - ensure all categories of affected people will be compensated at full replacement cost (market cost plus any transaction costs and land preparation cost for agricultural land). - compensate for permanent or temporary loss of livelihood (income, employment) through provision of compensation or rehabilitation support

persons and communities that shall be displaced by land acquisition as well as host communities who shall receive those who are to be resettled, so as to obtain adequate information about land titles, claims and use. The valuation method for determining replacement cost should be documented in respective Resettlement and/or Livelihood Restoration plans. Where land markets are still in a formative stage, clients should seek valuation by external independent professional valuation experts (or if there are no professional valuation experts, other professionals with relevant expertise acceptable to the EBRD and the client). (EBRD PR5, paragraph 5, footnote 7, page 29).

				<ul style="list-style-type: none"> - provide alternative land of equal value reflecting the terms of the lease or any other agreements in place. If suitable land is not available, cash compensation will be offered instead - loss of lease (months paid) and assistance in identifying a new lease on an alternative land. - compensate affected people (formal or non-registered land users or owners) for loss of non-land assets at full replacement cost.
Eligibility Classification	<p>Affected persons may be classified as follows:</p> <ul style="list-style-type: none"> i. persons who have formal legal rights to the land (including customary and traditional rights recognised under national law) or assets ii. persons who do not have formal legal rights to land or assets at the time of 	<p>National legislation:</p> <ul style="list-style-type: none"> - Does not recognise and compensate who do not have formal rights to land or assets or no recognisable legal rights or claim to land or assets they occupy/use - Provides opportunity for non-registered land users or owners to register their lands prior to the land acquisition process after receiving the 	<p>Not aligned.</p> <p>National legislation recognises and compensates only formal legal rights holders to land or assets, whereas EBRD PR5 recognises informal landowners and users.</p>	<ul style="list-style-type: none"> - Aktas will - Ensure that all categories of affected people will be recognised as eligible - In case of physically displaced person, Aktas will offer them a choice of options for adequate housing with security of tenure so that they can resettle legally

	<p>the census, but who have a claim to land or assets that is recognised or recognisable under national law</p> <p>iii. persons who have no recognisable legal right or claim to the land or assets they occupy or use.</p>	<p>decree² from the government on the land acquisition. Once the non-registered land user or owner obtained legal status for use or ownership of the specified land, then his or her land compensation rights will be treated as a legal land user or legal landowner.</p> <ul style="list-style-type: none"> - Compensation for land and non-land assets is only explicitly provided for titled legal landowners or users, and whether the legal status has not been obtained yet, no compensation will be made. 		<p>without having to face the risk of forced eviction.</p> <ul style="list-style-type: none"> - In case of economically displaced persons, Aktas will compensate for lost assets (such as crops, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost. - Compensate affected persons for loss of land, loss of non-land assets or structures at full replacement cost. - Livelihood restoration assistance (in-kind or in cash) will be provided for loss of non-land assets.
Non-title users and Unregistered	Those without formal legal rights (tenant-users with verbal or undocumented agreements with	Compensation for land and non-land assets is only explicitly provided for titled landowners, and for non-land	Not aligned: Only formal titleholders are considered for compensation.	Aktas will consider those without formal legal rights and claims for compensation of non-land assets affected.

² The State Property Law refers to adopting the decrees on beginning of expropriation of land plot or another immovable property in connection with a seizure of land plot for state needs. In case the right of private ownership of land plot is not registered in accordance with the legislation of the Republic of Kazakhstan, the owner, after the adoption of the decree, may make the necessary arrangements to register his/her right on the affected land plot. The period of compulsory acquisition for state needs set by the decree cannot be extended by more than a year (Article 63.7 of State Property Law).

Users or Residents	landowners) and claims are entitled to compensation for non-land assets (e.g., crop, tree and structure losses).	assets for registered users. The assets must be registered.		
Resettlement and Livelihood Restoration Planning and Implementation	<p>When land acquisition and resettlement are the responsibility of the government, IFC PS5 requires the client to collaborate with the relevant government agency to the extent the agency allows, in order to achieve outcomes aligned with the applicable Performance Standard. If the government lacks sufficient capacity, the client must take an active role in the planning, implementation, and monitoring of the resettlement process.</p> <p>In situations where land rights or access to land are acquired either through compulsory means or negotiated settlements that involve physical displacement, the client must identify and describe the resettlement measures undertaken by the government. If these measures fall short of the Performance Standard's requirements, the client is responsible for preparing a</p>	No requirement to consider potential impacts, or appropriate livelihood restoration measures. No requirement to provide relocation assistance and for exploring opportunities for the PAPs to benefit from the project.	Not aligned.	Aktas has prepared this Land Acquisition and Resettlement Framework (LARF) to meet lender requirements. At this stage of the Project design, with limited information available on Project Affected Persons (PAPs), only economic displacement is anticipated. However, to ensure all PAPs are properly identified, Aktas will prepare a Livelihood Restoration Plan (LRP), including a census and asset inventory, based on the provisions of this LARF.

	<p>Supplemental Resettlement Plan. This plan, together with the government's documentation, must ensure compliance with the standard's general and specific requirements for physical and economic displacement.</p> <p>For projects involving only economic displacement, the client must similarly identify and describe the government's compensation measures. If these are inadequate, the client must develop an Environmental and Social Action Plan to complement government efforts. This may involve providing additional compensation for lost assets and taking further steps to restore livelihoods, where relevant.</p> <p>When land acquisition and resettlement are managed by the government, EBRD PR5 requires that the private sector (the client) must work with the responsible government agency, as permitted, to align with the objectives of the Performance Requirement</p>			
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	<p>(PR). If the government lacks capacity, the client must actively participate in the planning, implementation and monitoring of resettlement activities. Furthermore the client must prepare a framework or a plan that complements government documents and meets PR requirements. This includes: Entitlements: Description of displaced persons' rights under local laws. Gap Analysis: Measures to address any gaps between local entitlements and PR standards. Responsibilities: Clear outline of financial and implementation duties of both the government and the client.</p>			
Monitor and Supervision of Land Acquisition and Resettlement Process	Monitor and evaluate the implementation of a RAP or LRP.	<p>The implementation of the resettlement process is not supervised by the State or court. Akimats receive regular progress updates but cannot intervene when grievances arise. The Court participates only in resolution of cases submitted for court review or through E-Otinish state grievance mechanism.</p> <p>The Kazakh law does not require a third-party consultant for monitoring the livelihood of affected land owners/users following land acquisition</p>	<p>Partially aligned:</p> <p>Some formal monitoring conducted by local akimats as part of their administrative responsibilities.</p>	Aktas will conduct internal and external monitoring of implementation of the LRP as required by EBRD PR5 and IFC PS5.

Option for Land-for-Land and Cash-for-Land	To provide land-for-land or cash-for-land options.	National legislation provides options for land-for-land (upon request) or cash-for-land compensation where possible.	Fully aligned	
Avoidance of Forced Eviction	Avoid forced evictions.	If the court makes the final judgement for compulsory acquisition, forced eviction is possible.	Not aligned.	Aktas will prioritise all feasible alternatives and seek to avoid forced eviction by all means possible through negotiation, design alternatives and collaborative solutions. Where forced eviction cannot be avoided, Aktas will notify the lender(s) before any eviction takes place and documenting attempts to prevent eviction.
Economic Displacement	The objective focuses on restoring livelihood and standards of living for APs, regardless of tenure or legal status.	No provision for assisting economically affected persons other than compensation for affected assets and lost income from affected businesses. The objective does not explicitly include restoration of livelihood and standards of living. No requirement for provision of relocation assistance and for exploring opportunities for the APs to benefit from the project.	Not aligned.	Aktas will develop the Livelihood Restoration Plan (LRP) to comprehensively address the expected economic displacement impacts by maintaining thorough compensation records and implementing tailored livelihood restoration measures for affected individuals and communities.

3.0 PROJECT LAND NEEDS AND POTENTIAL DISPLACEMENT IMPACTS

3.1 Project Land Needs

As of 26 August 2025³, the following categories of lands will be affected by the Project components within Moiynkum and Shu districts of Zhambyl region and Zhambyl district of Almaty region, through either acquisition or easement agreements (servitudes):

■ Agricultural Land

- Acquisition required: 21 plots, totaling 3,124.3 ha

Easement agreements (servitudes) required: Applicable exclusively to the OHTL routes. These agreements grant usage rights for the transmission corridor without transferring ownership. Not available at the moment of writing, as the specific land plots affected by tower bases have not yet been defined.

■ Industrial Land

- Acquisition required: 1 plot, totaling 1.4 ha

Easement agreements required: Applicable exclusively to the OHTL routes. These agreements grant usage rights for the transmission corridor without transferring ownership. Not available at the moment of writing, as the specific land plots affected by tower bases have not yet been defined.

■ Reserve Land

- Acquisition required: 2 plots, totaling 7,604 ha

Easement agreements required: Applicable exclusively to the OHTL routes. These agreements grant usage rights for the transmission corridor without transferring ownership. Not available at the moment of writing, as the specific land plots affected by tower bases have not yet been defined.

■ Forest Fund Land

- Acquisition required: 8 plots, totaling 9,886 ha

Easement agreements required: Applicable exclusively to the OHTL routes. These agreements grant usage rights for the transmission corridor without transferring ownership. Not available at the moment of writing, as the specific land plots affected by tower bases have not yet been defined.

The total number of land plots is around 105 and the total expected impacted area is **around** 20,000 hectares (tentative number at the time of writing).

Table 3 provides an overview of the Project components that require land acquisition and cause land acquisition impacts.

Please note:

- All figures presented in the text and tables reflect the status at the time the LARF is prepared and are tentative. Final data will be provided in the Livelihood Restoration Plan.
- Easement rights: The figures provided below represent the general potential plots along the OHTL route that may be affected by land acquisition for the tower bases and easement agreements. At this stage, the exact locations of tower bases within the Right of Way (RoW) have not yet been determined. Therefore, the numbers are indicative only and subject to change following detailed design.

Table 3: Summary of Project Components and Associated Land Acquisition Impacts⁴

Project Component	Associated Land Acquisition Impacts
P1: WPP 250 MW + Access roads	<ul style="list-style-type: none"> ■ Construction and maintenance of an access road with total area of 74,3517 hectares require acquisition of: <ul style="list-style-type: none"> - 9 plots for agricultural activities with a total land of 62 ha ■ Construction and maintenance of turbines with on-site roads of 23 sections with 38 turbines require acquisition of: <ul style="list-style-type: none"> - 5 plots with the areas of populated settlements with the total area of 268,9 ha - partially affects reserve lands
P2: WPP 250 MW	<p>Construction and maintenance of turbines with on-site roads in the amount of 30 sections with 40 turbines require acquisition of:</p> <ul style="list-style-type: none"> - 5 plots for agricultural activities with a total land of 1825,9 ha and will partially affect: - reserve lands - 1 forest fund land plot
P3: WPP 300 MW	<p>Construction and maintenance of turbines with on-site roads in the amount of 22 sections with 46 turbines require acquisition of:</p> <ul style="list-style-type: none"> - 6 plots for agricultural activities with a total land of 1234 ha <p>and will partially affect:</p> <ul style="list-style-type: none"> - 1 forest fund land - reserve land
P4: WPP 200 MW	<p>Construction and maintenance of turbines with on-site roads in the amount of 9 sections with 26 turbines will affect 1 forest fund land plot</p>
S1, L1 Substation South + OHL 500 kV from SS Shu to SS South	<p>Construction and maintenance of 500 kV power transmission line Substation South - Substation SHU with length of 143km do not require acquisition, but require easement agreements (servitudes) for:</p> <ul style="list-style-type: none"> - 63 land plots for agricultural activities with a total land of 2409,28 ha - 2 land plots for industrial activities with a total land of 5,26 ha. <p>The component activities partially affect forest fund lands:</p>

⁴ Disaggregated data for each project component concerning Reserve land is not fully available. Where data exists, it is reported; where it does not, this is because all components affect portions of the same two plots, which together total 7,604 hectares. The situation is similar for forest fund land: the total area is 9,886 hectares. Updated and definitive figures will be provided in the Livelihood Restoration Plan (LRP) as soon as they become available.

	<ul style="list-style-type: none"> - Kokterek forest fund land plots in Moiyunkum district Koskuduk forest fund land plots in Shu district
S2, L2, L3 SS North Mirny 500 kV. OHL 500 kV SS North Mirny - SS Yukgres . OHL 500 kV SS North Mirny - SS South Mirny	<ul style="list-style-type: none"> ■ Construction of power transmission line 500 kV from Substation North Mirny to Substation Yukgres, 70.147 km long do not require acquisition, but require easement agreements (servitudes) for: <ul style="list-style-type: none"> - 5 land plots for agricultural activities with a total land of 379,7 ha and will partially affect for servitudes: - 1 reserve land plot with a total area of 8,8 ha 3 forest fund land plots <p>Development of land management project for the construction of power transmission line 500 kV from Substation North Mirny to Substation South Mirny, 18 km long do not require acquisition, but require easement agreements (servitudes) for:</p> <ul style="list-style-type: none"> - 3 land plots for agricultural activities with a total land of 157,1 ha and will partially affect: - The same three forest fund land plots mentioned above, designated for the construction of the 500 kV power transmission line from Substation North Mirny to Substation Ulken.
U1 Upgrade SS Shu	Enhancement of Substation Shu require acquisition of 1 cadastral unit for agricultural activities with a total area of 2,4 ha
U2 Upgrade SS Yukgres	Enhancement of Substation Yukgres require acquisition of 1 cadastral unit for industrial activities with a total area of 1,4 ha
I1 Permanent Camp	Construction of permanent camp will require land acquisition and will partially affect 1 forest fund land plot
B1 - BESS Battery energy storage system 300 MW / 600 MW*h	Construction of BESS will require land acquisition and will partially affect 1 forest fund land plot

3.2 Involuntary resettlement

As the Project is a Public-Private Partnership (PPP), according to the relevant laws (see Section 2.0), the Government of Kazakhstan retains the legal right to expropriate land for state needs. However, negotiated land acquisition has been the preferred approach. If agreements cannot be reached, expropriation may be triggered. Therefore the process constitutes involuntary resettlement, and IFC Performance Standard 5 (PS5) and EBRD Performance Requirement 5 (PR5) will apply.

3.3 Parties responsible for Project land acquisition and resettlement

The key parties responsible for Project land acquisition and resettlement (LAR) activities are:

- Aktas Energy LLP – Project developer.
- TERSC - Construction Management Contractor.
- EPC Contractor and subcontractors.
- WSP – ESIA consultant for the Project

- The Department of Land Relations for the Zhambyl and Almaty Regions:
 - Responsible for allocating and registering land at the regional level.
 - Monitoring land use and ensuring compliance with land regulations.
 - Enforcing land legislation and handling land disputes within the region.
 - Supporting regional planning and development by overseeing land-related projects.
- The Akimats of Moiynkum and Shu districts within the Zhambyl Region, and Akimat of Zhambyl district of Almaty Region including the Land Acquisition Department within each district
 - These local government bodies coordinate the land acquisition process, directly affecting resettlement and compensation for affected communities, thereby playing a critical role in the livelihood restoration activities.
- Licensed valuers engaged for the valuation of affected land plots and assets.
- Forestry and Wildlife Committee (FWC) are responsible for management of forest fund lands.
- State forest owners are state forest management organizations under FWC to which land plots of the state forest fund have been granted under the right of permanent land use.
- Committee for Land Resources Management (CLRM) of the Ministry of Agriculture of the Republic of Kazakhstan are responsible for the development of the draft resolution of the Government of the Republic of Kazakhstan on the transfer of forest fund lands to another land category.
- Ministry of Ecology and Natural Resources are responsible for the state environmental expert examination of the draft resolution of the Government of the Republic of Kazakhstan on the transfer of forest fund lands to another land category (developed by CLRM).
- The Government of Kazakhstan (GoK) issues a resolution on the change of status of forest fund lands.

Aktas will implement with the Government a coordinated and participatory approach to land acquisition and livelihood restoration, ensuring alignment with IFC Performance Standard 5 (PS5) and EBRD Performance Requirement 5 (PR5). The following measures will be undertaken:

- Meaningful consultation and participation: Aktas will work closely with local Akimats to facilitate genuine and inclusive consultation with Project-Affected Persons (PAPs). Multiple rounds of community meetings will be held in each affected settlement, co-hosted by the Akimats and the Project's Land Acquisition and Community Liaison teams. These meetings will be used to disclose key information (e.g. cut-off dates, entitlement matrix, compensation options), gather feedback on preferences (e.g. land-for-land vs. cash compensation), and ensure that PAPs are fully informed and able to influence decisions. Special attention will be given to the inclusion of women, elderly-headed households, and other vulnerable groups. The Akimats will assist in identifying such groups, and Aktas will organise smaller focus group discussions or individual consultations to ensure their voices are heard and their specific needs are addressed. All engagement will be conducted in local languages and supported by accessible materials and formats.
- Compensation at full replacement cost: Aktas will ensure that all compensation is provided at full replacement cost, regardless of statutory valuation levels. This will be achieved by coordinating official valuations conducted by licensed valuers with supplementary top-up payments or in-kind assistance funded by the Project. Where appropriate, the Department of Land Relations, in consultation with the Committee for Land Resources Management (CLRM), may offer land-for-land options (e.g. new lease

allocations) as an alternative to cash compensation. All compensation agreements will be documented and auditable, with clear records maintained in the Entitlement Matrix and individual compensation files.

- Livelihood restoration and assistance: Aktas, in collaboration with Akimats and relevant government agencies, will implement tailored livelihood restoration measures for PAPs who experience significant economic displacement. Severely affected households may be supported through access to state agricultural support programmes, short-term employment opportunities with the Project, or provision of agricultural inputs (e.g. fodder, tools, seeds). Where informal use of forest or reserve land is identified (e.g. for grazing or beekeeping), the Forestry and Wildlife Committee (FWC), Akimats, and Aktas will coordinate to provide relocation support or compensate for lost income. Aktas and Akimats will jointly monitor livelihood outcomes through follow-up visits and surveys. Where needed, additional support (e.g. training, access to microfinance) will be offered to ensure that livelihoods are restored to pre-project levels or improved.
- Grievance mechanism: Aktas will maintain and update the existing Grievance Mechanism (GM), as outlined in the Stakeholder Engagement Plan (SEP) and referenced below in the section “Grievance Mechanism”, to explicitly cover land-related complaints.

Monitoring and reporting: Monitoring responsibilities will be shared between Aktas and local authorities. Aktas, will lead overall monitoring and reporting to lenders, including tracking compensation delivery, grievance resolution, and livelihood restoration outcomes. Akimats will provide field-level data and participate in joint monitoring visits. If monitoring identifies any delays, non-compliance, or unresolved issues, the Land Acquisition and Livelihood Working Group will convene to agree on corrective actions. Aktas will also commission an independent completion audit of land acquisition and resettlement activities, with participation from Akimat representatives, to verify compliance with PS5 and PR5.

3.4 Land acquisition impacts

Methodology and limitations

The information presented in this LARF is based on data available at the time of its preparation, primarily drawn from the Project’s ESIA. Additional data related to the land acquisition process, collected and analyzed in August 2025, has also been incorporated.

No direct consultations with formal (leaseholders) and informal land users (e.g., herders) were conducted during the preparation of this LARF. However, appropriate information disclosure, consultation, and the informed participation of affected individuals will take place, and the feedback gathered during these consultations will guide the further development of the Livelihood Restoration Plan (LRP).

It is important to note that the cadastral data reviewed for this LARF may contain information gaps. These will be verified as part of the LRP development through fieldwork, including the socio-economic survey, land and asset inventory, asset valuation, and consultations with affected landowners and users.

Potential gaps may include:

- Unregistered users of land and property;
- Deceased owners with legal heirs who are unregistered or have not completed inheritance procedures;
- Unregistered changes in property ownership;
- Unregistered rights of use (e.g., customary rental arrangements);
- Unregistered non-residential structures (e.g., auxiliary buildings);
- Unregistered building extensions exceeding the recorded property size;

- Unrecorded buildings (e.g., structures built without permits);

Another important limitation to consider in this study is that the ESIA baseline surveys do not cover the full routes of the three 500 kV overhead transmission lines (OHTLs), the additional 35 kV OHTL, or the external access roads to the WPP site. Consequently, the resettlement and livelihood impact assessment will need to be updated and refined using new data collected during the baseline data gathering for the LRP.

The Project is expected to result in economic displacement for formal leaseholders and informal land users due to the loss of assets or access to assets, such as seasonal assets used for grazing livestock in the area, which may affect income sources or livelihoods.

The occurrence of physical displacement will need to be confirmed through forthcoming baseline studies (e.g., census and asset inventory).

3.4.1 Displacement impacts by Project Component

The Project footprint spans a range of land categories, including agricultural land, reserve land, Forest Fund land (forestry) and industrial land.

Each Project component has been assessed for its specific land requirements and associated impacts.

Construction Phase – Temporary land occupation (Temporary economic displacement)

During the 30–36 month construction phase, the Project will temporarily occupy land for various works. All displacement impacts in this phase are temporary and economic in nature – land use is temporarily discontinued and will be restored after construction.

Inside the WPP Site: Construction will require certain areas within the site to be cordoned off, disrupting existing land use (open grazing land) for the duration of works:

- Construction compound and workers' camp: 19.9 hectares will host the workers' camp, equipment yards, and site offices throughout construction. This area whether previously used for grazing routes or under lease, will be inaccessible to leaseholders or local users (e.g. herders) until it is dismantled and rehabilitated post-construction. Leaseholder(s) and local herders will experience a temporary loss of access to the grazing area and blocked access routes in that zone (a short-term economic impact). After construction, this area will be restored, and activities (e.g. crops, grazing) will be enabled to resume.
- Medium-voltage (MV) cable trenches: Approximately 180 km of trenches will be excavated on-site to bury 35 kV cables between the turbines. Each trench entails a narrow corridor of works moving across the site. As the trenching progresses, small strips of land will be temporarily taken out of use. Herders might be temporarily unable to graze animals, pass through or cross those active work corridors. These impacts are short-lived and rolling (as trenches are backfilled, the land is freed up again). They constitute temporary economic displacement – a short-term restriction on land use and livelihoods (grazing) with no lasting effect, since the land will be fully restored once cables are installed.
- 35kV Temporary OHTL: The temporary 35 kV OHTL will require a linear corridor for construction, including tower installation and conductor stringing. The Right of Way (RoW) will be temporarily occupied during the construction phase, restricting access to the land for the duration of the works. If the alignment crosses areas currently leased or used for grazing purposes, leaseholders and informal users will experience a temporary loss of access to their leased land. This constitutes a short-term economic displacement, as leaseholders may be unable to carry out permitted activities within the affected corridor. Informal land users and herders may also face temporary disruption to grazing patterns or access routes. Upon completion of construction and dismantling of the temporary line, the land will be rehabilitated and returned to its prior condition, enabling leaseholders and informal users to resume their activities without long-term restrictions.

Outside the WPP site: Beyond the WPP Site, temporary land occupation will occur primarily along linear infrastructure corridors:

- Routes of the new three 500 kV overhead transmission lines (OHTLs) and 35kV OHTL used for construction. Construction of these components will require a temporary Right of Way (RoW) where work will take place. Because the ESIA baseline did not cover the entire length of the OHTL routes, the exact locations and persons affected will be confirmed during the forthcoming census and asset inventory. However, the following temporary impacts are anticipated:
 - Temporary economic displacement due to restricted land access – Agriculture: In agricultural areas, if a transmission line RoW crosses cultivated fields, any standing crops may be damaged or destroyed by construction activities (e.g. by tower foundation excavation or movement of machinery) and farmers might be unable to plant or harvest on the affected strip of land for one growing season. This is considered temporary economic displacement, the land is not permanently taken, but crop income is lost for that period. Project-Affected Persons (PAPs) expected are farmers who own, lease, or informally cultivate land in the construction corridors. All such PAPs will be compensated for temporary loss of crops at full market value of the yield lost. After construction, they can resume cultivation in the RoW (since farming will be allowed under the lines during operation).
 - Temporary economic displacement due to restricted land access – Grazing: As the presence of herders cannot be excluded within the OHTLs Right of Way (RoW), if the transmission line routes traverse land used informally for grazing, informal livestock herders may temporarily lose access to some grazing areas during construction. For example, a herder may need to avoid a corridor where towers are being erected or may be unable to move livestock along their usual route if it is cut by an active work site. This results in temporary economic displacement for those herders – a short-term loss of grazing resources and potential inconvenience/cost (such as needing to graze elsewhere or feed hay). PAPs expected are informal herders using land along the OHTLs routes. The project will coordinate with herders to maintain access where possible (e.g. creating gaps or providing alternative driveways around work zones) and will compensate for any demonstrable losses, such as the cost of alternative fodder if grazing land is unusable. This impact is strictly temporary; once construction in a given segment is complete, herders can return to use the land as before.
 - Temporary economic displacement due to restricted land access - business disruption: the OHTL routes passes through agricultural, forest fund and reserve land in a rural area. In case any small informal business is found located along construction areas, it could experience temporary disruption. For instance, a farm-based workshop might see reduced customer access due to works or need to be moved to avoid construction dust. Affected informal businesses could suffer temporary loss of income (economic displacement) and, in some cases, might need to temporarily relocate equipment or operations. *PAPs expected* are owners of any such enterprises and their employees. If these types of businesses are found, Aktas will engage with any affected business owners in advance to plan measures – for example, providing signage or alternative access to keep a shop accessible, or assisting in the temporary relocation of movable assets. Any documented income loss during the construction period will be compensated. No physical demolition of business structures is expected purely for temporary access; if unexpected obstructions arise, the project will work to avoid or minimize dismantling.

All these construction-phase impacts outside the WPP Site will be confirmed and documented during the census and asset inventory. This survey will identify all land parcels and users affected by temporary occupation, including measuring crop areas and counting assets like trees or structures in work zones. The findings will feed

into the Livelihood Restoration Plan (LRP) to ensure that each affected party receives prompt compensation and/or assistance. Since these impacts are temporary, the emphasis is on timely, fair compensation and restoring land to its original condition or utility after works.

Construction Phase - Permanent land acquisition (Permanent economic and potential physical displacement)

Permanent land acquisition is required for the core Project infrastructure. These acquisitions result in permanent displacement impacts: affected persons will permanently lose land access or usage rights (economic displacement), and some may need to relocate structures or other assets (physical displacement). Below, we separate impacts inside the WPP site (the wind farm area) and outside the WPP site (transmission line routes and access roads), as the context and types of losses differ.

Inside the WPP Site

The following project components require permanent land take within this site:

- Installation of 150 Wind Turbine Generators (WTGs) across four phases for turbine foundations, crane pads, and associated infrastructure.
- Approximately 160 kilometres of internal roads.
- Battery Energy Storage System (BESS).
- Operations and maintenance (O&M) compound (offices, maintenance workshops, staff accommodation, etc.).
- Two new 500 kV substations: North Mirny and South Mirny.

The ESIA baseline confirms that this land, while officially classified as “agricultural” in the cadastre, was used only informally for livestock grazing - there were no cultivated crop fields, orchards, or permanent residences within the footprint. No commercial or industrial enterprises operated there either at the time of the surveys. Therefore we anticipate the following permanent displacement impacts inside the site:

- Permanent economic displacement due to permanent land loss – private land: Formal leaseholders (APs who held state leases for land) will lose the portions of their leased territories that fall within the project site. Since no formal crop farming was present, there is no loss of cultivated agricultural production. However, they will permanently lose the opportunity to use that land for income generation.
- Permanent economic displacement due to permanent lost access - Grazing: informal herders who traditionally accessed this area will lose access to that pasture. In practical terms, the stocking capacity of the surrounding community’s pastures is reduced – herders will have to graze their livestock on a smaller available area outside the permanent infrastructures and change their grazing routes. This is a permanent economic displacement impact: a loss of an income-generating resource (pasture) and a reduction in livelihood opportunity (livestock herding) for those users.
- Potential economic displacement of temporary shelters: While no permanent residential structures were identified within the WPP site during the ESIA phase, seasonal or temporary shelters (e.g., yurts) used by herders during spring and summer grazing periods have been observed. Their precise locations are not yet available and may change seasonally, making it unclear whether they fall within areas subject to permanent land acquisition or use restrictions. Further confirmation will be provided through additional baseline data collection activities (e.g., census and asset inventory) to populate the LRP.

- Potential physical displacement of community facility – Water wells: The social baseline noted the presence of water wells within the WPP site that local herders rely on for livestock water. Exact locations will be confirmed during the LRP. If these wells are located within areas subject to acquisition or restrictions, they may also need to be relocated.

Outside the WPP Site

Outside the main site, permanent land acquisition is needed for linear components:

- Approximately 72 kilometres of off-site access roads. New access roads will permanently convert strips of land to public road use. This means some landowners will permanently lose those strips (which are typically alongside existing routes or across open land).
- The land beneath the tower bases for the three 500 kV overhead transmission lines (OHTLs). Each transmission line tower requires a footing (e.g., a ~10 m × 10 m area) that will be permanently occupied by the pylon base. That specific land is effectively acquired out of private use (a small parcel at each tower location).

Since the ESIA baseline survey did not cover the full length of the line routes (which were finalized later), these impacts will be fully catalogued during the asset survey. We anticipate the following permanent displacement impacts outside the site:

- Permanent Economic Displacement due to permanent land loss – Agricultural whether applicable: The construction of the OHTLs will require the acquisition of the land beneath the tower bases for the three 500 kV overhead transmission lines (OHTLs). The design of these tower bases has yet not been chosen and neither the easement rights. Loss of perennial crops (e.g. trees) may happen if found present on the RoW.
- Permanent economic displacement of businesses (formal/informal) due to permanent land loss: In the unlikely event that a business (formal/ informal) lies directly in the path of an OHTL tower or access roads it may face permanent constraints or relocation. For example, if a small workshop is located where a tower needs to stand, that structure would need to be removed, potentially disrupting the business permanently or requiring it to move to a new site. PAPs: Owners of any affected business structures (and associated workers). Mitigation: If a business structure must be permanently removed or relocated, this is a case of both physical and economic displacement. If the business can remain in place but suffers a partial loss of land (say a storage yard shrinks due to the tower base or access roads, it will receive compensation for the reduced utility of its property and any resulting income loss. The aim is that no enterprise is worse off: it should be able to continue operating at a new location or in a modified configuration with no lasting loss of profitability.

Construction Phase - Permanent land use restrictions

Outside the WPP site, permanent land use restriction will apply for linear components:

- The Right of Way (RoW) for the lines – roughly 60 m wide for the 500 kV lines. The land in the RoW remains under existing ownership but will be subject to permanent usage restrictions (through easements/servitudes) for safety clearance

Since the ESIA baseline survey did not cover the full length of the line routes (which were finalized later), these impacts will be fully catalogued during the asset survey. We anticipate the following permanent displacement impacts outside the site:

- Permanent Economic Displacement – Agricultural land use restrictions: Where the transmission RoW crosses privately owned or leased agricultural land, the land will not be fully acquired from the owner, but it will be encumbered with a public servitude (easement) that imposes certain permanent restrictions on its

use (see Operation Phase below for details of restrictions). The landowner/leaseholder will technically retain ownership and can continue to use the land within the RoW for acceptable activities (e.g. farming low-growing crops, grazing). However, they lose the freedom to use that land as before. In particular, they will be prohibited from building any structures in the corridor and from planting trees or other tall vegetation. This significantly diminishes the land's utility and value for the owner: for instance, they cannot develop a house or a barn on it in the future, and some types of high-margin agriculture (e.g. orchards) are no longer possible. Effectively, the land's potential is reduced to open-field farming or grazing. This impact is a form of permanent economic displacement, as it reduces income opportunities and asset value, even though the land is not fully taken. PAPs: landowners (or long-term leaseholders) of affected plots; in some cases, non-titled land users if they were informally using a piece of state land in the RoW.

All the above permanent impacts outside the site will be verified during the census and asset inventory. This includes mapping each affected parcel along the line routes, identifying the owner and any non-owner users, recording assets like crops and trees, and noting any structures close to the alignment. The compensation agreements or awards will reflect not only the tangible assets (land, crops) but also the loss of any use rights (recorded as servitudes). The LRP will detail entitlements for these stakeholders, ensuring compliance with local law and lender standards. Importantly, no residences are expected to lie in the transmission corridors and access roads— the routing was chosen to avoid settlements – so we do not anticipate physical displacement of households along the OHTLs and access roads. If the additional studies to be carried out for the plan reveal any dwelling within the corridor, the project will adjust the alignment or, if no alternative, acquire and relocate that dwelling with full compensation, in line with PS5 requirements. At this stage, however, permanent displacement outside the WPP site seems to only affect land and livelihood assets (economic displacement), not homes.

Operation Phase

During the operation phase, statutory safety zones come into effect around project infrastructure. These do not involve new land take but impose long-term land-use restrictions for safety. In essence, the operational phase impacts are a continuation of the permanent economic displacement already described, enforced through legal restrictions (easements/servitudes). No additional physical displacement occurs during operation, since all relocations, if confirmed, would have been completed prior to commissioning. Key operation-phase considerations:

Within the WPP Site

Permanent Protected zone (MV Cable Trench)

The following Project components require permanent protected zones:

- The medium-voltage (MV) cable trenches within the WPP site extend for approximately 180 km and will create minor permanent restrictions on land use in operation. Once installed, the buried cables limit certain activities directly above or adjacent to the trench.

Under Kazakhstan's electrical safety regulations (Order No. 330 of 2017), an underground cable line has a protected strip 1 m to each side of the cable. Now that the 35 kV cables are installed and buried, a corridor ~2 m wide along each cable route is subject to special conditions: no building of structures, no deep digging, and no planting of deep-rooted trees is allowed in that strip. The wind farm operator has the right to access these strips at any time for maintenance and must restore any disturbance if they dig up the cable for repairs. This is a very minor restriction within the site – effectively, it prevents the project itself from using that 2 m strip for any purpose other than grassland. Since the entire site is under project control and was already allocated for turbines, roads, and open buffer spaces, this rule has no impact on external stakeholders. It does not cause additional economic displacement to the community, because the land in question is already acquired and compensated. It will be

allowed controlled grazing of sheep in parts of the site, which can be done safely over buried cables. In short, the MV cable safety zone is an internal technical buffer that does not affect any remaining land users (the impact of losing this land was accounted for when the site was acquired).

Outside the WPP Site

OHTL Protective Zones and Easements –

In operation, each overhead line establishes an official protective zone along its route, per the Order of the Minister of Energy No. 253 (2015). These zones are the same widths discussed earlier (Minimum 30 meters horizontally on each side from the line's outer conductors so 60 m wide for 500 kV) and essentially codify the land-use restrictions for safety - no structures or residences may exist in the zone, and activities are limited to those compatible with an overhead line. Practically, this means that the land in the corridor remains as open space (fields, pastures) and cannot be developed. As noted, all affected landowners have been or will be granted compensation through servitude agreements for these limitations. For landowners, this represents a permanent economic displacement impact – they retain ownership but with reduced rights indefinitely. However, this impact is the same one identified under permanent land acquisition: the protective zone enforcement is exactly what the easement compensation was for. By the time of operation, each affected owner has already been compensated for the fact that their land is now subject to these restrictions. There is no new category of affected people in the operational phase; it is a continuation of the permanent displacement addressed above. It is important to highlight that no family should be living within an operational protective zone. The line routing was designed to avoid houses. Local authorities will also not approve any new construction in these zones going forward. Thus, it is not expected any physical displacement during operation (If a house had existed, it would have been dealt with before operation, as noted.) If the protective zone extends onto a parcel adjacent to the easement area – for example, if a line runs right along a property boundary, the zone might marginally encumber the neighbour's land – the Land Code ensures that neighbour also has a right to compensation. Extending the servitude to cover that portion or otherwise compensating the adjacent owner for any new restrictions on their use of land will be done. This scenario will be checked in the final surveying.

Legally, the project (through the grid operating company, e.g. KEGOC) holds public easements on all private lands under the OHTL routes. These easements (public servitudes) are the formal mechanism by which the protective zone rules are enforced. They require the landowner to “tolerate” the presence of the line and abide by the use restrictions (no buildings, etc.), and they guarantee the company's right of access for maintenance. In return, the owner receives compensation for the diminution of their property rights. If an easement “severely impedes” the land's use for the owner, Kazakh law allows the owner to request additional compensation or even a full purchase of the affected land. This legal safeguard aligns with IFC PS5/EBRD PR5's requirement to avoid leaving owners worse off. In the LRP, provisions for monitoring these cases will be provided – if, for example, an owner finds after some time that farming is no longer viable on the reduced/unusable portion of land, they can raise a claim and the project will coordinate a fair solution (which could be an extra payment or acquiring the plot).

Safety zones of windfarm

Wind turbines do not have a legislated off-site safety zone beyond the project's own boundary. In practice, the wind farm was sited such that the nearest village or dwelling is several kilometres away, and a minimum 100 m radius clear area is maintained around each turbine (this distance exceeds typical safety recommendations for noise and blade throw). Each turbine tower in operation will be enclosed by fencing at its base, preventing public access right next to the turbine. Operational displacement impact from wind turbines is not expected, because no one lives or works in close proximity who would need to move or alter their activities. Local residents remain at a very safe distance, and land immediately around turbines was already acquired. Grazing can continue up to the fence line of turbines on adjacent lands. The only caution is during winter icing conditions, when ice can

shed from blades – herders will be advised (through community safety outreach) to keep a safe distance during those rare events, but this does not require any formal exclusion zone (herders are not expected to graze livestock on this land during winter, as grazing typically occurs in spring and summer). Therefore the wind farm's presence does not impose additional restrictions on neighboring land use outside the fence. No additional households or land users are expected to be affected during operation apart from those already compensated.

Safety zone for BESS⁵

The Battery Energy Storage System is contained entirely within the WPP site, in a fenced compound. There are no specific off-site safety zones mandated by law for BESS; however, the project maintains an internal buffer (around 50 m) between the BESS and the site boundary for fire safety. No displacement impact related to the BESS in operation are expected. It is far from any settlement and does not restrict any community land. Herders can graze outside its fence just as before. The facility being secured and away from public areas means it poses no need for community exclusion zones beyond the site.

Protective zone for high voltage substations

Electrical substations (particularly high-voltage grid substations) have clearly defined safety zones under Kazakh law Order No. 330 (2017). The two 500 kV substations on site have a small protective zone (around 30 m) that technically should be kept clear for electrical safety and noise buffering. This 30 m zone lies mostly within the project's acquired land and just slightly outside the substation fence in a couple of places. The surrounding area is uninhabited open land. There is no operational displacement impact on external parties from the substations. No homes or farms are near enough to be affected by substation noise or EMF, and the land around the substation fence can be used for grazing in operation as before. Herders can graze right up to the fence however they cannot build anything in the immediate vicinity. Thus, operational safety requirements for the substations do not impose any new restriction on community land use.

⁵ [PROTECTED ZONES](#)

3.5 Land Acquisition Process

The land acquisition process has started around Q1 2025 and is expected to be completed at the latest around Q1 2026.

Each category of land follows a different acquisition strategy, as described in the sections below.

3.5.1.1 Acquisition strategy for Reserve Land

The strategy for acquiring Reserve Land plots is based on securing full land use rights, which results in ownership. This process is structured into six sequential steps, as illustrated in

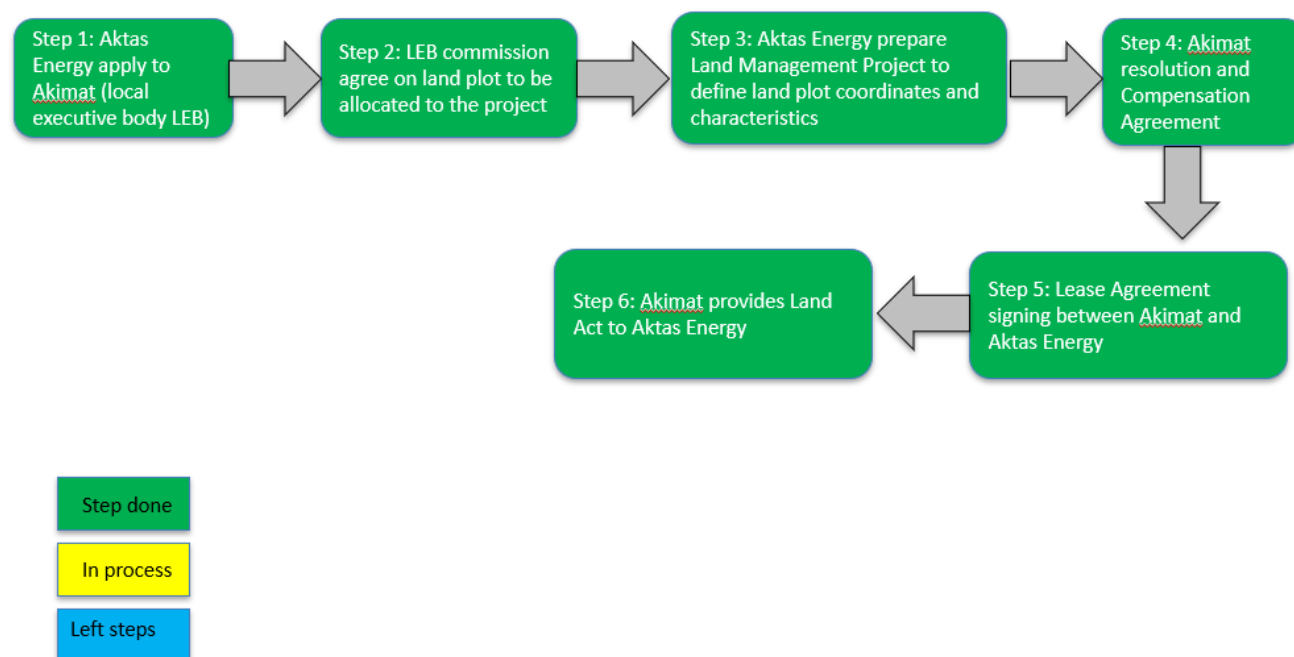


Figure 2.

It begins with Aktas submitting an application for the identified land plot to the Local Executive Body (LEB) - Akimat, the authority responsible for land allocation. Once the application is received, the LEB commission reviews and approves the allocation of the plot for the Project. Following this, Aktas prepares a Land Management Project, which defines the coordinates and characteristics of the land.

In the next phase, the LEB committee issues its resolution and a compensation a Compensation Agreement is signed between Aktas and the Akimat. After this, a lease agreement is signed between the Akimat and Aktas. The final step involves the issuance of the Land Act by the Akimat, officially granting ownership to Aktas.

To date, Aktas has successfully completed all required steps and has obtained the Land Act for the Reserve Land. Ownership is granted for a period of 49 years, which is the maximum term permitted for industrial land, and will remain valid for at least 28 years, in line with the duration of the Power Purchase Agreement (PPA).

Under the current Project layout, two land plots have been acquired: one measuring 783 hectares and another measuring 6,821 hectares.

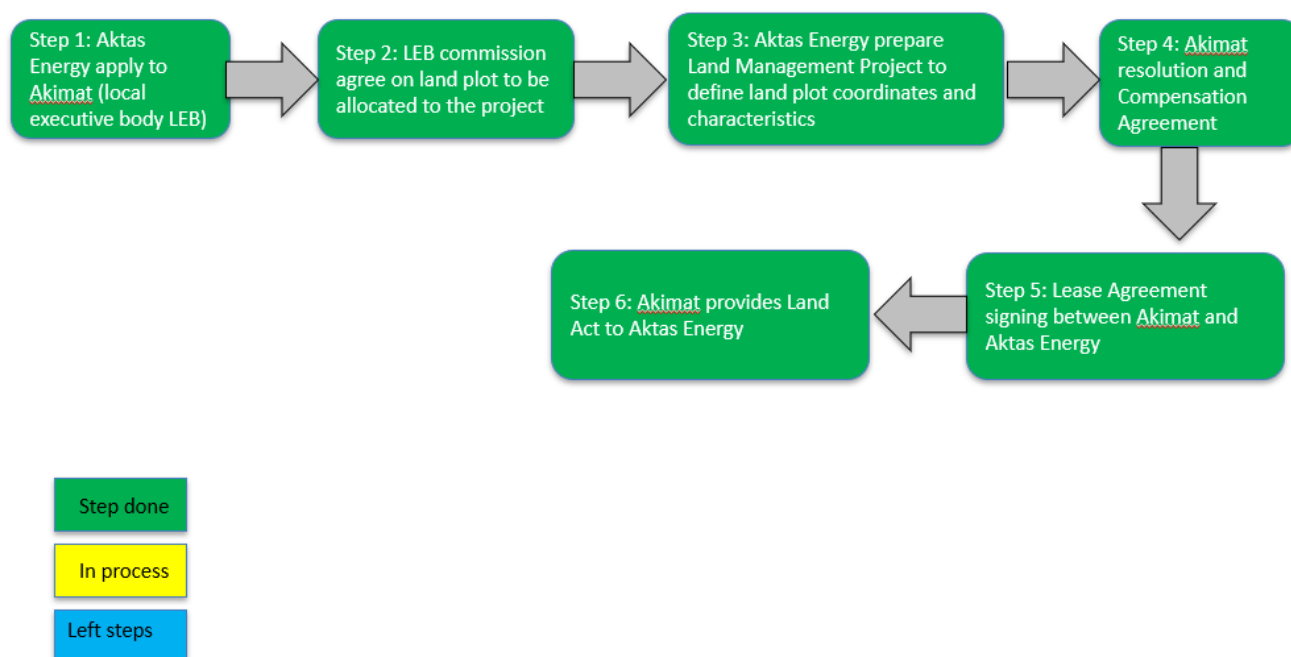


Figure 2: Land acquisition strategy and status – Reserve Land. Source: Total Energies

Provisional data on Project Affected People (PAPs)

At this stage, the exact number and identity of Project Affected Persons (PAPs) cannot be confirmed. Additional studies will be conducted during the preparation of the Livelihood Restoration Plan (LRP) to fill existing information gaps.

Preliminary assessments indicate that no formal PAPs are expected to be impacted by the acquisition of Reserve Land, as this land is reportedly state-owned and managed by the Akimats; no official land users have been identified. However, these figures are provisional. They may change after detailed design and further studies (e.g. including household socio-economic surveys, census, asset inventory, and evaluation), particularly because some entitlement categories are not recognized under national legislation.

3.5.1.2 Acquisition Strategy for Private land – Agricultural and Industrial

The strategy for acquiring agricultural and industrial land plots involves securing full land use rights, which results in ownership. This process is divided into six steps, as illustrated in the following Figure. So far, Aktas is in the process of finalizing Step 4.

The process began with Aktas submitting an application to the Local Executive Body (LEB) - Akimat for the identified land plot. The LEB commission subsequently approved the allocation of the plot for the Project. In Step 3, Aktas prepared the Land Management Project (LMP), which defines the coordinates and characteristics of the land.

Currently, Aktas is engaged in Step 4, which involves negotiating compensation with the affected land users (leaseholders). These users are required to return either part or all of their land to Akimat. For plots that have been partially reduced and returned, a new Land Management Project must be prepared by Aktas as part of the compensation process.

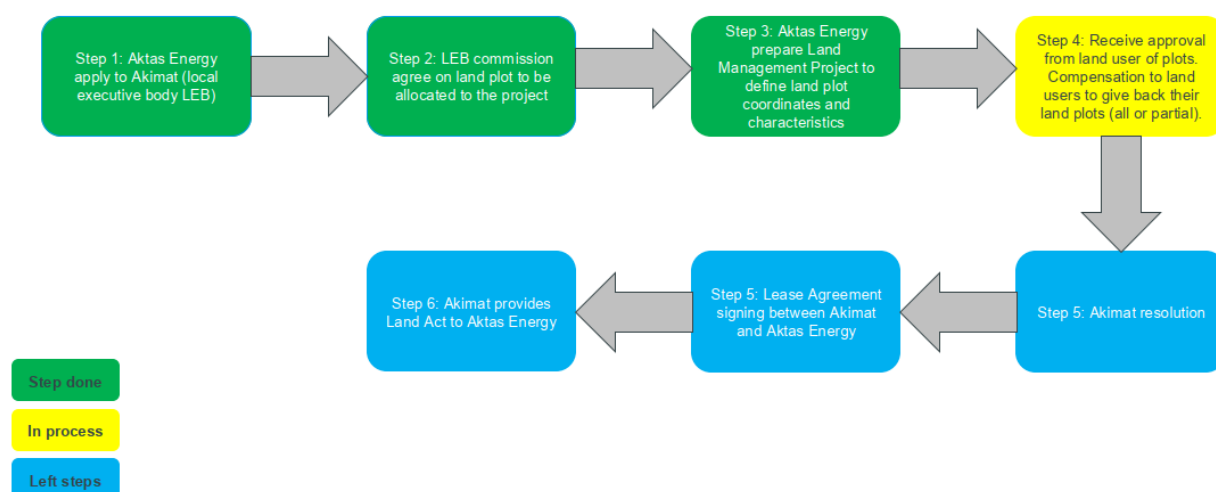


Figure 3: Land acquisition strategy and status – Agricultural and Industrial. Source: Total Energies

Valuation and compensation of assets

The valuation of affected assets on private land was completed in accordance with national legislation as part of Step 4 of the land acquisition process. Compensation amounts have been agreed between Aktas and formal land users (leaseholders) through official agreements, covering most affected users (19 out of 22). However, these amounts currently reflect national legal requirements, which may not align with the replacement cost principle required under IFC Performance Standard 5 (PS5) and EBRD Performance Requirement 5 (PR5). To ensure compliance, the Project will review all valuations and compensation against the replacement cost principle. Where gaps are identified, corrective measures will be implemented, including top-up payments if necessary, to achieve full replacement cost. Details of the valuation process aligned with PS5/PR5 principles for the Livelihood Restoration Plan (LRP) are provided in the 6.1.4.3 section of this LARF.

Provisional data on Project Affected People (PAPs)

At this stage, the exact number and identity of Project Affected Persons (PAPs) cannot be confirmed, as the detailed design is not yet available and additional studies will be carried out for the LRP to close the informational gaps. Based on preliminary assessments, it is estimated that approximately 22 formal land users may be affected from land acquisition of Private Land. At the time of writing the number of informal land users is not available. These figures are provisional and subject to change following the completion of the detailed design and the additional studies (e.g. household socio-economic surveys, census, asset inventory and evaluation) planned during the preparation of the Livelihood Restoration Plan.

3.5.1.3 Acquisition strategy for Forestry Land

The acquisition strategy for Forestry Land follows two separate steps, described further below.

3.5.1.3.1 First Step - Declassification of forestry land status

The process for transferring land from the state forest fund to other categories for non-forestry purposes in Kazakhstan begins with Aktas submitting an application to the Local Forest Authority (LFA) who send back the documents to the Regional Akimat (Local Executive Body – LEB). The Local Forest Authority collaborates with the applicant to select a land plot and define its boundaries, formalized in a Land Plot Selection Act. A public hearing is then organized, and its minutes are used by a Special Commission to issue an opinion for changing land category from forest to industry. Based on this, the LEB prepares a resolution for land transfer and sends it to the Committee of Forestry and Wildlife under the Ministry of Ecology and Natural Resources for approval. Once approved, the conclusion is shared with the LEB, who reorganises all documentation and submits to the Land Management Committee under the Ministry of Agriculture. The Land Management Committee submits

the documentation package to the Ministry of Ecology in order to initiate the preparation of the environmental assessment. Aktas is now completing this last action.

Following that, the steps left consist in the Ministry of Ecology prepares the environmental impact assessment and submits it back to the Land Management Committee. The Land Management Committee uses this information to prepare a Government Decree. The Government of the Republic of Kazakhstan issues the official decree for the land category changes.

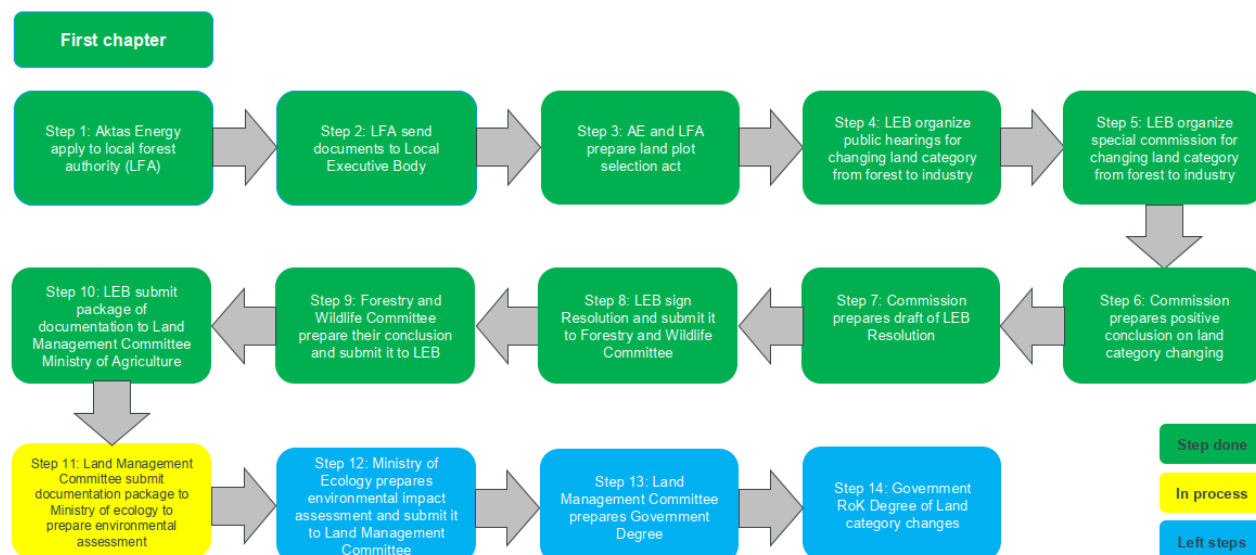


Figure 4: Declassification of forestry land status – Forest Land. Source: Total Energies

3.5.1.3.2 Second Step- Securing use right under industrial use

Following the reclassification of the land from forestry to industrial use, the process that the Client must follow to secure the land from the Akimat remains the same as outlined in Chapter 3.5.1.2.

At this stage, none of the steps have been initiated, as the preceding step has not yet been completed.

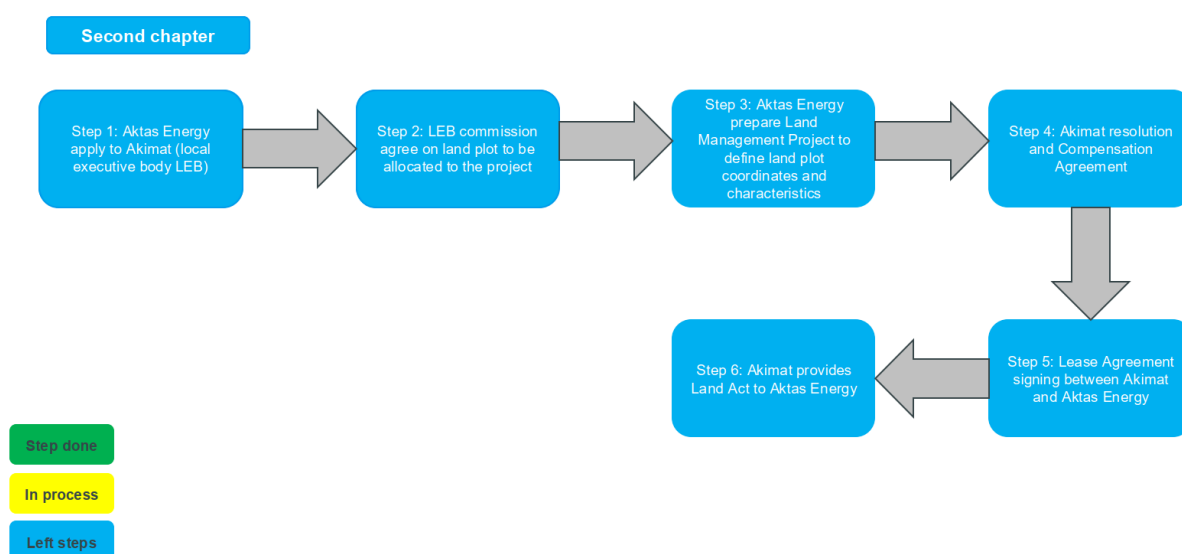


Figure 5: Securing use right under industrial use. Source: Total Energies

Provisional data on Project Affected People (PAPs)

At this stage, the exact number and identity of Project Affected Persons (PAPs) cannot be confirmed, as additional studies will be undertaken during the preparation of the Livelihood Restoration Plan (LRP) to address existing information gaps.

Based on preliminary assessments, no PAPs are expected to be affected by the acquisition of Forestry Land, as this land is reported to be state-owned. However, since certain categories of entitlement are not recognized under national legislation, these figures remain provisional and may change following the completion of detailed design and further studies (e.g. including household socio-economic surveys, census, asset inventory, and evaluation).

3.5.1.4 Easement rights for the OHTLs

The process begins with the Client submitting an application to the Local Akimat (Local Executive Body – LEB). Upon approval, the LEB allocates a land plot to the Project as an easement for a three-year period. Aktas then prepares a Land Management Project, detailing the land plot, its coordinates, and characteristics. This LMP is submitted to the Akimat, which subsequently enters into a land lease agreement with Aktas for the construction phase. After construction, Aktas defines the coordinates for OHTLs supports and updates the LMP accordingly. Aktas then negotiates compensation with private land users, and once an agreement is reached, it develops the land user's LMP to reflect the necessary adjustments. Aktas submits both its own and the land user's LMPs, along with the compensation agreement, to the Akimat. Following this, the Akimat enters into a new land lease agreement with the Client and updates the Land Act, providing the revised version to both the Client and the private land user to reflect the transferred land portion.

As of this writing, Aktas has signed Easement agreements with formal land users; however, the precise locations of the line supports have not yet been determined, so the valuation and compensation process has not commenced.

Provisional data on Project Affected People (PAPs)

At this stage, the exact number and identity of Project Affected Persons (PAPs) cannot be confirmed, as the detailed design is not yet finalized. Additional studies will be conducted during the preparation of the Livelihood Restoration Plan to address existing informational gaps. Based on preliminary assessments, it is estimated that approximately 72 formal land users may be affected by land restrictions related to easement rights for the overhead transmission lines. The number of informal land users is currently unknown. These figures are provisional and subject to change following completion of the detailed design and planned studies (e.g. including household socio-economic surveys, census, asset inventory, and valuation) planned during the preparation of the Livelihood Restoration Plan.

3.5.2 Summary of Status for the land acquisition process

Table 4 provides a summary of each Project component, indicating the land category, the area affected (in hectares), and the status of the land acquisition process carried out by national authorities and Aktas as of August 2025⁶. Please note:

- All figures presented in the table reflect the status at the time the LARF was prepared and are tentative. Final data will be provided in the Livelihood Restoration Plan.

⁶ The data reported herein reflect the information provided as of August 2025. Should any changes occur, the updated data will be incorporated into the Livelihood Restoration Plan (LRP).

- Easement rights for the OHTLs have not yet been acquired. At this stage, only general potential plots have been identified (numbers reported below in the table); the specific land plots that will be affected by the tower bases and RoW have not yet been determined.

The status is presented in accordance with the acquisition steps outlined for each land category in the previous sections.

Table 4: Land acquisition progress.

Project component	Package title	Land category	Plot area, ha	Status
P1	Phase 1: WPP 250 MW + Access roads	Agricultural land	62	In progress Step no. 4
		Lands of populated areas (villages, cities)	268,9	In progress Step no. 4
		Reserve land	N/A ⁷	Completed
P2	Phase 2: WPP 250 MW	Agricultural land	1.825,9	In progress Step no. 4
		Reserve land	N/A	Completed
		Forestry land	N/A ⁸	In progress Step no.9
P3	Phase 3: WPP 300 MW	Agricultural land	1.234	In progress Step no. 4
		Forestry land	N/A	In progress Step no.9
		Reserve land	N/A	Completed
P4	Phase 4: WPP 200 MW	Forestry land	9.886	In progress Step no. 9
S1, L1	Substation South + OHL 500 kV from SS Shu to SS South	Agricultural land (easement)	2.409,28	In progress Step no. 4
		Industry land (easement)	5,26	In progress Step no. 4
		Forestry land (easement)	N/A	In progress Step no. 9
S2, L2, L3	Substation North + OHL 500 kV from SS South to SS North + OHL 500 kV from SS North to SS Yukgres	Agricultural land (easement)	536,8	In progress Step no. 4
		Forestry Land (easement)	N/A	In progress Step no.9
		Reserve Land (easement)	N/A	Completed

⁷ Detailed data not yet available; only total provided at this stage. Total Reserve land impacted 7,604 ha

⁸ Detailed data not yet available; only total provided at this stage. Total Forest Fund Land impacted 9,886 ha

Project component	Package title	Land category	Plot area, ha	Status
U1	Upgrade SS Shu	Agricultural Land	2,4	In progress Step no. 4
U2	Upgrade SS Yukgres	Industry Land	1,4	In progress Step no. 4
I1	Permanent Operations and maintenance Compound	Forestry Land	N/A	In progress Step no.9
B1	BESS	Forestry Land	N/A	In progress Step no.9
Total			Around 20,000 ha	

4.0 SOCIO-ECONOMIC CONDITIONS OF AFFECTED COMMUNITIES AND VILLAGES

A Social Baseline Study was carried out in 2024 to cover the communities expected to be affected during both the construction and operation phases of the Project. The survey area primarily included the Project area, the villages of Mirny, Kiyakty, Ulken, Sholpan, Shyganak, Khantau and Kenes which are the closest communities to the proposed wind farm and BESS site and OHTLs routes. The closest villages are Mirny, village located approximately 26 kilometers away, and Kiyakty village, which is about 21 kilometers distant from the WPP area. Key locations impacted by the Project are as follows:

- **Mirny Village:** As the nearest community to the wind farm, Mirny is critical for assessing the direct social and economic impacts, including potential changes in local prices and community dynamics.
- **Kiyakty Village:** This village's proximity to the wind farm warrants inclusion for understanding how construction activities may affect livelihoods, particularly in terms of job creation and access to services.
- **Sholpan Village:** While very small, with only two houses and two granite mining companies (one currently inactive), Sholpan's inclusion provides insights into the impacts on very localized populations and potential employment opportunities linked to the wind farm.
- **Shyganak Village:** Recognizing this community completes the survey area by accounting for additional social aspects and potential benefits arising from increased economic activity in the region.
- **Khantau Village:** It is relatively densely populated (about 1000 residents) compared to other nearby settlements and serves as a source of labor for livestock grazing and other activities.
- **Moiyunkum Village:** The village is an administrative center of Moiyunkum district and local residents are engaged as labor force in the Project area (herders).
- **Kenes Village:** The village will experience some impacts during the construction of overhead lines in its vicinity, with the closest point being approximately 500 meters from the residential area. Due to the short-term duration of the construction works, the estimated social impact is very low.

- **Ulken Village:** The village will experience some impact during the construction of overhead lines and switching to Yukgres Substation, with the closest point being approximately 1 km from the residential area. Due to the short-term duration of the construction work, the estimated social impact is very low.

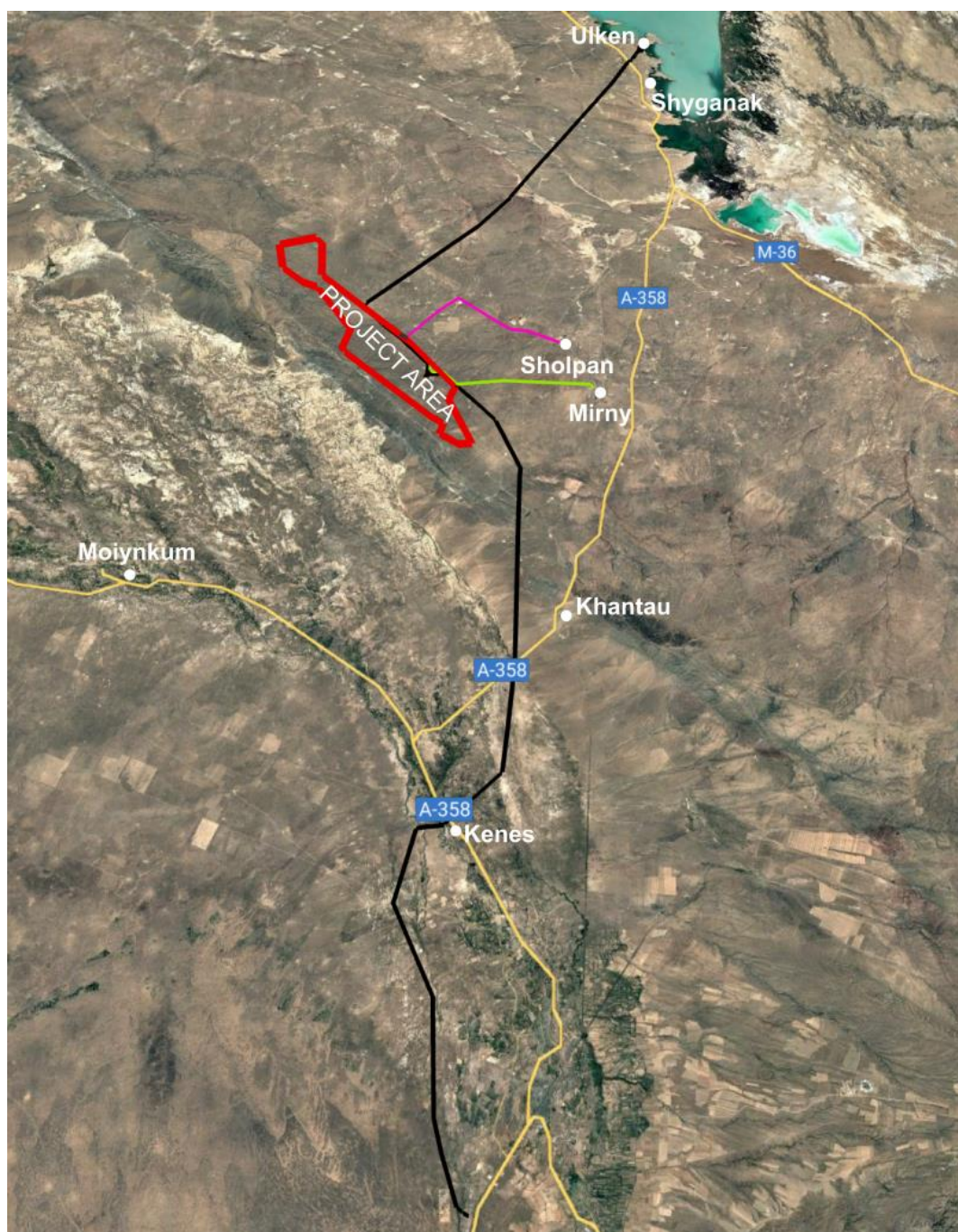


Figure 6: Key villages' locations affected by the Project

4.1.1 Vulnerable Groups

In the area surrounding the Project site, several vulnerable groups face significant challenges that impact their quality of life and access to essential services:

- **Low-income and unemployed households:** Struggle to secure basic necessities, including clean water, adequate nutrition, and stable living conditions. Amongst this group, local herders are recognized as highly

vulnerable, as one of the main sources of income and means of sustaining livelihoods is livestock keeping and grazing. Accordingly, local residents from nearby villages are hired as seasonal herders. The acquisition of grazing lands may lead to additional unemployment and negatively affect the livelihoods of local herders and their families.

- **Elderly persons (especially pensioners):** Often face mobility challenges and depend on social support, leaving them at risk of economic hardship and social isolation.
- **Women:** Women often having limited decision-making power in community matters. These constraints increase their vulnerability to economic insecurity and restrict their ability to adapt to changes caused by land acquisition or livelihood disruption.
- **Single-parent families:** Experience heightened vulnerability due to the dual burden of caregiving and providing financially, which can result in both economic and emotional stress.
- **Youth and adolescents:** Are at risk when educational opportunities are limited, reducing their chances for future employment and sustainable livelihoods.

Certain groups were not included in the social baseline assessment because they are not relevant to the local context. There are no foreign migrants or refugees in the area, and all residents are native speakers of either Kazakh or Russian, which are both official languages of Kazakhstan. The literacy rate in the country is extremely high, 99.8% according to 2020 data, so literacy-related vulnerabilities are not a concern. Additionally, Kazakhstan's legislation does not differentiate between major ethnic groups and ethnic minorities. While statistical data may indicate the presence of small numbers of various ethnic groups such as Kurds, Turks, Germans, and Tatars, their representation in the Project Aol is minimal. Given this demographic and legal context, it is difficult to envisage how land acquisition could specifically or disproportionately affect ethnic minorities.

4.1.2 Employment Issues

During the social survey conducted during Social Baseline Study in the impacted villages near the Project area, all respondents expressed concerns regarding unemployment, highlighting the challenges faced by the community in securing stable livelihoods. The primary employers in the area are the Akimats (local executive bodies), livestock farms, mining companies and construction activities, which provide essential jobs for a limited number of residents. However, beyond these main economic sectors, many individuals in the village rely primarily on pensions as their main source of income. This heavy dependence on government assistance and the limited availability of job opportunities contribute to the prevailing sense of uncertainty regarding economic stability.

5.0 PAST STAKEHOLDER ENGAGEMENT

Between January and November 2023, TotalEnergies conducted two consultation meetings as part of the ESIA scoping phase. In parallel, the Client carried out ten interviews and focus groups with institutional stakeholders and representatives of local communities in Astana and Mirny. These activities aimed to inform stakeholders about the Project, gather information on the site and its surroundings, identify potential impacts, and collect stakeholder expectations and concerns.

Further consultations were conducted by TotalEnergies and WSP through Green Operating during the development of the ESIA, between February 10, 2024, and January 9, 2025. This phase included seventeen meetings and over one hundred engagements with stakeholders, involving national and local government authorities, community members, civil society organizations, and NGOs. Engagement formats included both official and informal meetings, surveys, and interviews.

The following list summarises key consultations that specifically addressed the topic of land acquisition. For a comprehensive overview of all stakeholder consultations, please refer to the Project's Stakeholder Engagement Plan.

- On February 10, 2024, an official meeting was held in Astana with representatives from the national government, including the Forestry and Wildlife Committee of the Ministry of Ecology and Natural Resources. While various topics were discussed, such as wildlife compensation, chip tagging for Argali sheep, and bird collision mitigation, particular attention was given to land use. It was noted that part of the project area overlaps with forest fund lands, raising concerns about land classification and project implementation. A participant recommended engaging with the forest owner to clarify the legal status of the land, with the aim of avoiding unnecessary reclassification and ensuring compliance with existing regulations. This topic was revisited in a follow-up meeting with the same stakeholder on October 2, 2024.
- On July 10, 2024, an official meeting was held with representatives of the Akimat of Moiynkum village and the Head of the Land Management Unit. Discussions focused on land management practices and the allocation of land plots within the district.
- On July 9, 2024, informal interviews and surveys were conducted at the Project site with approximately ten herders and one landowner. All the herders were seasonal workers, primarily residing in the villages of Mirny, Kiyakty, Khantau, and Moiynkum. One herder emphasized the importance of a drilled well located on the Project site, noting that it serves as a vital water source for livestock in an area where water is scarce. Most landowners were unavailable for interview, as they reportedly reside in larger cities such as Almaty and Taraz or in district centers. The one landowner who was interviewed did not express significant concerns and indicated a willingness to relocate grazing activities if compensation or an alternative grazing area were provided.

The engagement activities summarized above provide the basis for the following key objectives of SE with respect to land acquisition:

- Build relationships based on trust and transparency with communities affected by land acquisition and displacement.
- Build the capacity of affected communities to understand and participate in the resettlement process, including understanding their rights and entitlements.
- Enable communities affected by land acquisition to engage in a two-way dialogue and provide meaningful input, that is, to meaningfully participate in and influence the design and implementation of the LRP in a manner consistent with the principles of informed consultation and participation.
- Create an inclusive environment in which views, issues, and suggestions can be expressed by all members of the affected community, including women, elderly, youth, and potentially vulnerable, disadvantaged, or marginalized groups.
- Establish an accessible and responsive grievance mechanism (GM).

6.0 FRAMEWORK FOR LIVELIHOOD RESTORATION

6.1.1 Principles

Land acquisition has already commenced in accordance with national legislation. However, there are gaps between the national requirements and the standards set by EBRD Performance Requirement 5 (PR5) and IFC Performance Standard 5 (PS5). This Livelihood Restoration Framework (LARF) is designed to address those gaps.

Since the Client has identified all affected land plots and the acquisition process is ongoing, this LARF key objectives are the following:

- Give an overview of the land acquisition process carried out so far;
- Bridge the differences between national legislation and the requirements of PR5/PS5;
- Establish key principles to guide the development of a Livelihood Restoration Plan (LRP).

This framework ensures compliance with international standards while building on the actions already taken.

6.1.2 Stakeholder engagement

The following table presents the sequence of stakeholder engagement activities necessary to ensure informed disclosure and participatory consultation with Project Affected Persons (PAPs) in relation to land acquisition and involuntary resettlement. So far, engagement has reached the initial planning stage. However, the Project footprint has not yet been disclosed, and although land acquisition has commenced, no official cutoff date has been declared, in line with national regulations. These gaps will be addressed during the development of the Livelihood Restoration Plan (LRP). Consequently, all engagement activities from the initial planning onward are still pending.

Table 5: Stakeholder Engagement Sequence for land acquisition

Stage	SE Activities
Scoping	Scoping-related stakeholder engagement was undertaken during the ESIA scoping phase, with key land-related stakeholders and the engagement strategy identified and set out in the Stakeholder Engagement Plan (SEP).
Initial planning	In July 2024, during the development of the baseline ESIA, informal interviews and surveys were conducted at the Project site with approximately ten herders and one landowner to gather their perspectives on the Project and its potential impacts related to land acquisition. However, at the inception of the planning stage, another round of information and consultation with community leaders and representatives will be carried out. It is often at this stage that the precise footprint is disclosed for the first time, which should not happen too early before the cutoff date is declared in order to minimize the potential for speculation.
Planning	It is important to consult with the community in its entirety during the planning stage on issues such as compensation rates, livelihood restoration, and so forth, culminating in an agreement with the community on entitlements. It will be necessary at this stage to meet with individual households to discuss livelihood-restoration measures.
Baseline data collection	This process will start with the explanation of the process to community and committee meetings and can include the range of tools described in Section 6.1.4 of this LARF.
Negotiation and implementation	Negotiations with each directly affected household will begin with a planning phase and will conclude upon the household's formal agreement to its individual compensation package, which will address physical relocation and livelihood restoration, where applicable

Stage	SE Activities
Monitoring	This process of engagement with affected communities will commence early during the planning phase, but will be especially important during implementation, when unforeseen issues and grievances are most likely to arise and must be identified to enable appropriate corrective actions (see Section 6.1.7. Monitoring).
Completion audit	The process of interaction with the affected community by an independent auditor after the implementation phase is particularly important to identify whether there are any outstanding issues that still need to be addressed and to be able to confirm if the land-acquisition process has been completed satisfactorily (see Section 6.1.7.2.2. Completion audit).

6.1.2.1 Stakeholder Identification

Stakeholders are generally categorized as either directly or indirectly affected:

- **Directly affected stakeholders** include:
 - Individuals already identified by the Client as economically displaced due to land acquisition. These will be recognized as Project Affected Persons (PAPs) and included in the scope of the Livelihood Restoration Plan (LRP).
 - Those impacted by restricted access to natural resources. These impacts will be identified during LRP preparation and addressed through appropriate mitigation and livelihood restoration measures.
 - Individuals affected by other construction or operational activities. These impacts will also be assessed during LRP preparation and mitigated accordingly.
- **Indirectly affected stakeholders** are those who live near the project footprint or have a vested interest in the project. This includes vulnerable groups, stakeholders involved in the land-acquisition process, who are identified in the **Section 3.2** of this LARF, International Finance Institutions/ Lenders, Civil Society Organisations, NGOs, Media, and academic and research institutions as identified in the SEP.

Both categories will be updated during the LRP preparation phase.

6.1.2.2 Engagement Methods and Tools

The LRP will describe methods and tools for stakeholder engagement. These will consist of the following three:

- **Committee.** Community-based committee allow carrying well-formed and well-organized SE activities for comprehensive implementation of the LRP. The committee shall be headed by local district akims or selected representative amongst affected communities, and of the affected community, including women, youth, herders, the disabled, and vulnerable groups as identified in this LARF. Such committee can be organized through local WhatsApp groups, which was identified as main communication tool during social surveys conducted during the Social Baseline Study.
- **Community Meetings.** General community meetings will be held during development and implementation of LRP to provide a necessary level of transparency and provide a means to inform the entire community of decisions reached with the committee and verify agreement. Such meeting can be organized via local WhatsApp groups and held in local akimats.

- **Focus Groups.** Focus groups are a powerful technique and have the following benefits:
 - Convening of separate meetings for groups (e.g., women, businesspersons (agricultural landowners), herders), thereby eliminating challenges that such groups may experience in expressing themselves in broader meetings, and capturing each group's concerns, opinions, or expectations.
 - Discussing specific issues in detail (e.g., the layout and design of a WPP and associated facilities that affect pasturelands) to reach a practical solution that has the agreement of all that will be subject to the resettlement process.
 - Facilitating a discussion among the participants themselves, thereby allowing them to identify their own solutions and reach consensus.
 - Building a common understanding, as it is often observed that many people enjoy discussing topics in a well-facilitated focus group, sharing their views, hearing others' views, and building mutually agreed solutions.

Topics for focus group discussions include the following:

- **Baseline surveys:**
 - Land uses, including customary and informal land tenure arrangements, and land market values
 - Use of natural resources (e.g. grazing)
 - Maps of location of natural resource use sites for persons whose livelihoods are natural-resource-based
 - Migration (both in and out)
 - Agricultural calendars for men, women, and youth and interaction with calendars for other activities
 - Community safety
 - Coping strategies in case of hardship
 - Women's and vulnerable groups' specific Project-related concerns
- **Discussion of entitlements:**
 - Compensation rates
 - Preference for method of compensation (land-for-land, cash, other)
 - Equitable distribution of entitlements
 - Compensation for business loss
 - Development of livelihood-restoration programs
- **Host communities:**
 - Implications concerning local infrastructure
 - Implications concerning local power balance and relationships

- Community safety

6.1.2.3 Stakeholder Analysis and Mapping

Based on the Social Baseline Study conducted as part of the ESIA, the table below identifies stakeholder groups mapped according to the impacts of land acquisition. The mapping considers the type of impact they may experience, their level of vulnerability, and their potential to influence the land acquisition process, either positively or negatively. Stakeholder influence is dynamic and may evolve over time, so stakeholder mapping and analysis should be updated periodically, especially at key milestones during the land acquisition and Livelihood Restoration Plan (LRP) implementation. These updates should inform strategies to mitigate the influence of stakeholders who may negatively affect the process and to strengthen engagement with those who contribute positively.

Table 6: Stakeholder Mapping of the Project for land acquisition

STAKEHOLDER		LAND ACQUISITION IMPACTS						VULNERABILITY			INFLUENCE OVER LAND ACQUISITION PROCESS					
		POSITIVE			NEGATIVE						POSITIVE			NEGATIVE		
		H	M	L	H	M	L	H	M	L	H	M	L	H	M	L
DIRECTLY AFFECTED STAKEHOLDERS	Landowners				X			X						X		
	Land Users				X			X						X		
	Informal land users (including herders)				X			X						X		
	Local businesses						X		X		X			X		
INDIRECTLY AFFECTED STAKEHOLDERS	Local akimats and other executive authorities			X						X		X				
	Contractors and subcontractors			X						X			X			
	Civil Society Organisations, NGOs, Media, and academic and research institutions.			X						X		X			X	
	International Finance Institutions/ Lenders			X						X			X			

STAKEHOLDER		LAND ACQUISITION IMPACTS						VULNERABILITY			INFLUENCE OVER LAND ACQUISITION PROCESS					
		POSITIVE			NEGATIVE						POSITIVE			NEGATIVE		
		H	M	L	H	M	L	H	M	L	H	M	L	H	M	L
	Vulnerable groups ⁹					X		X				X			X	

Note: H = high; M = medium; L = low.

⁹ Currently, the vulnerable groups identified during the baseline assessment and listed above in Section 4.1.1 are acknowledged. However, the implementation of the Livelihood Restoration Plan (LRP), including the census and asset inventory, will determine whether these vulnerable groups are directly affected. If confirmed, their situation will be taken into consideration based on the specific impacts of land acquisition.

6.1.2.4 *Informed Consultation and Participation ICP*

Aktas will implement a structured and inclusive stakeholder engagement process to ensure Informed Consultation and Participation (ICP) in accordance with IFC PS5/EBRD PR5, which is described in the Stakeholder Engagement Plan (SEP). The objective is to ensure that Project-Affected Persons (PAPs), including vulnerable groups such as informal herders, are meaningfully consulted, informed in a timely and accessible manner, and provided with opportunities to influence decisions that affect their land, assets, and livelihoods.

The following measures will be implemented to uphold ICP throughout the land acquisition and livelihood restoration process:

- Public disclosure of the Livelihood Restoration Plan (LRP) and the Guide to Land Acquisition and Compensation (GLAC) will be conducted through public meetings, information desks at local Akimats, and direct outreach to PAPs. Notifications will be issued at least two weeks in advance via local information boards, online channels, and one-to-one phone calls.
- Public meetings and focus group discussions will be held in local languages (Kazakh and Russian), using visual aids and accessible materials. Meetings will be held in easily accessible locations, with transport support provided for PAPs from remote areas. Remote participation options will be offered where needed.
- One-on-one consultations will be conducted with affected households and individuals, particularly those with specific impacts such as the relocation of water wells or seasonal grazing structures. Feedback from these engagements will be documented and used to inform the design and implementation of mitigation measures.
- A multi-tiered grievance redress mechanism (GRM) will be maintained and publicised throughout the LRP implementation. PAPs will be able to submit grievances through local Akimats (recommended) or directly to the Project's Community Liaison Officers (CLOs). All grievances will be logged, tracked, and resolved in a timely and transparent manner.
- Monitoring of the effectiveness of stakeholder engagement and grievance procedures will be conducted through surveys and interviews. Feedback will be used to improve the engagement process and ensure that it remains responsive to the needs and concerns of PAPs.

6.1.2.5 *Internal engagement activities*

Internal stakeholders include project personnel as well as staff from contracting and subcontracting companies. The following are key activities of internal Project engagement:

- It is proposed to establish the Livelihood Restoration Implementation Team (LRIT) as outlined in **Figure 1**.
- Schedule regular meetings of the joint coordination team to address land-acquisition issues as they arise (weekly or fortnightly, especially during planning, asset surveys, compensation negotiations, and LRP implementation, when key issues will need to be decided in a timely manner). The meetings should be short and focused on achieving agreement and decisions on specific issues and coordination among teams.
- Compile a record and register of decisions and commitments to communities to ensure that they are fully addressed.
- Ensure that key lessons learned by the Project and LRIT are captured in monitoring and evaluation reports so that experience and the institutional memory of the land-acquisition process are not lost over time. This will enable any specific issues or grievances raised by the affected community at a later date to be addressed based on accurate historical land-acquisition information and decisions made. This is important because Project implementation and operational teams are often substantially different.

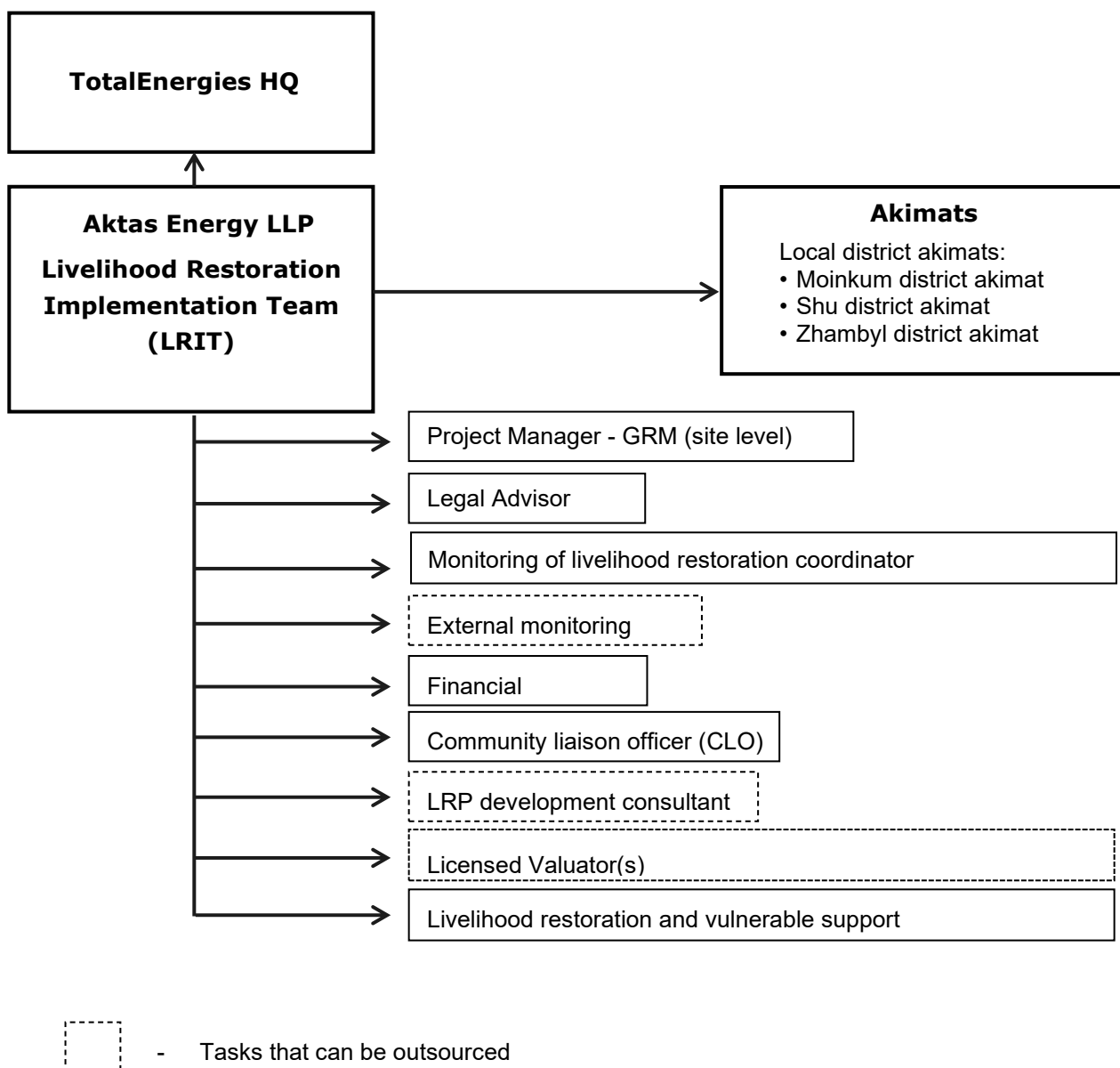


Figure 7: Proposed structure for Livelihood Restoration Implementation Team (LRIT)

6.1.2.5.1 Engagement with employees

Engagement with employees to inform them about land-acquisition and SE is important, especially if they are from the local community. It is certain that local employees will be asked by other community members about what they know concerning the Project, land acquisition, and compensation measures. It is better that they be kept informed and have the correct information to prevent the spread of unfounded rumours and potential misunderstandings. This can be achieved by holding brief awareness-building meetings, and regularly providing key information, such as the cutoff date for compensation, notice of community meetings, or major land-acquisition events, and so forth. Local employees with reliable information and a positive attitude can be ambassadors for the Project and contribute significantly to building trust relationships. Care must be taken that

there are no leaks of confidential data (such as individual compensation records) or information and plans that have yet to be agreed on and finalized. It is critical that affected persons' personal data be safeguarded.

6.1.2.5.2 Engagement with contractors

It is essential for Aktas to actively engage and coordinate with contractors and subcontractors, as local communities often associate them directly with the Project. Contractors and subcontractors must be fully informed about the Project's land acquisition policy, the objectives of the Land Acquisition and Resettlement Framework (LARF), and the requirements of the Livelihood Restoration Plan (LRP). Aktas should implement appropriate contractor control measures, such as integrating requirements into contractor management plans, to ensure alignment with Project standards. Even more critical is the involvement of contractors and subcontractors in land acquisition activities, particularly regarding temporary construction camps, access roads, quarries, and similar infrastructure. They must be clearly instructed to comply with the Project's social engagement and compensation policies and be closely monitored to prevent any violations. Effective coordination between Aktas, contractors, subcontractors, and construction managers is vital, especially concerning LRP implementation and construction schedules. Contractors often face budget and time constraints, which may lead to limited attention to coordination with the Land Rights Implementation Team (LRIT) and social engagement efforts. This can result in conflicts and project delays, for example, if contractors begin land clearing before compensation is finalized, or if they make unfulfilled promises to affected communities.

6.1.2.6 Development of Guide to Land Acquisition and Compensation (GLAC)

LRP may contain information that is not particularly relevant to individual communities and households being affected by land acquisition, especially in the case of linear Projects where information is provided concerning many different and separate PAPs. A Guide to Land Acquisition and Compensation (GLAC) will be used for the Project, to simply explain the key elements of the land-acquisition and compensation process in a few pages. The GLAC should be a short and concise outline of the step-by-step process of land acquisition and compensation and should be written specifically for directly affected communities, households, and individuals in straightforward language in Kazakh and Russian languages and provide practical information covering the following:

- Key principles to be followed in the land-acquisition process
- A summary of the land-acquisition and compensation process (schedule of future stakeholder engagement meetings, asset surveys, valuation of assets, negotiations, compensation offers, time to consider offers, legal procedures to follow if negotiations fail, finalization and signing of compensation agreements, payment and compensation of assets -in cash or in-kind -and timing of land take)

It is proposed to develop and disseminate GLAC via local WhatsApp groups amongst affected stakeholder in the early stage of LRP development.

6.1.2.7 Information Disclosure

The following will be addressed in a strategic approach to ongoing regular communication and disclosure of information to all stakeholders throughout all phases of land acquisition and livelihood restoration:

- Ensure that all communication and information disclosure is relevant, appropriate, and widely accessible to all affected stakeholders in a gender sensitive manner that is culturally appropriate. This can be accomplished through various channels, such as strategically placed community notice boards actively managed with information, updates, timetables, and pictures and the provision of pamphlets, plans, and guides (e.g. GLAC), in community centres and/or at a local Project information centre. LRIT team can interact with stakeholders through public meetings, workshops, and individual discussions with affected

households. CLOs can play a key role in arranging meetings, ensuring invitations are extended to all affected groups, and translating documents and discussions.

- Know your audience and tailor the contents of documents appropriately. Provide relevant information for different audiences based on the level of impacts, interest, and concern. Tailor the presentation of information according to language, literacy, and numeracy levels of the intended audience.
- Disclose information in Kazakh and Russian languages, taking into consideration all local ethnic groups.
- Take account of local cultural practices, leadership, and organizational structures and systems of information dissemination and feedback.
- Ensure that women, youth, elderly, disabled and other vulnerables receive information and can participate equitably in dialogue in a safe space free from coercion and intimidation. This may require interaction with individuals or representatives of interest groups via separate meetings and focus group discussions.
- Embrace digital dialogue and within local WhatsApp groups and social media pages to disclose Project documents and other information. Even remote rural communities are increasingly gaining access to digital communication, with the result that information can be sent, received, and spread very rapidly. This also enables feedback and an interactive two-way communication process. Short text message systems are also an efficient and cheap way to inform people of meetings and key news where access to smartphones remains limited.

6.1.2.8 Disclosure of Documentation

Project documents, such as GLAC and LRP, and communication notices will need to be disclosed as planning and implementation proceed. Disclosure of the land-acquisition process and displacement eligibility and entitlements information, including compensation and livelihood-restoration packages, should take place on local akimats information desks and digitally disclosed on local WhatsApp groups and social media pages. This may include drafts and final versions of the LARF and LRP. Where necessary, efforts should also be made to build and/or strengthen the capacity of Project-affected stakeholders to ensure that they adequately understand information concerning the Project land-acquisition impacts and the planned mitigation and compensation measures.

6.1.2.9 Grievance Mechanism

A Grievance Mechanism (GM) has been established as part of the Stakeholder Engagement Plan and will be further refined and operationalised during the implementation of the Livelihood Restoration Plan (LRP). The GM will be accessible to all Project-Affected Persons (PAPs), enabling them to submit grievances, concerns, or comments related to land acquisition, resettlement, and livelihood restoration activities.

The GM will be aligned with the requirements of EBRD Performance Requirement 5 (PR5) and IFC Performance Standard 5 (PS5), and will explicitly cover land-related complaints. This includes, but is not limited to:

- Land registration issues;
- Disagreements on asset inventory or valuation;
- Disputes over compensation rates or entitlements;
- Concerns regarding resettlement packages or plot allocation (if applicable);
- Defects in resettlement housing (if applicable);
- Damage to crops, livestock, or property during surveys or construction;

- Allegations of gender-based violence (GBV) or harassment linked to the land acquisition or compensation process.

These categories are further detailed in the SEP, which outlines the full scope of the GM and its procedures.

PAPs will be able to submit grievances through multiple channels, including:

- Directly to the Project's Community Liaison Officer (CLO);
- Via grievance boxes located at local district Akimats and on site;
- Through monitored WhatsApp groups and social media platforms managed by the CLO;
- Through the Akimats of the affected districts, who will coordinate with the Project team.

All PAPs will be informed of the grievance process, including how to submit complaints, expected timelines, and available support. The CLO will ensure that all grievances are acknowledged and responded to within 30 working days. The GM will be promoted during public meetings, disclosed in the GLAC, and reinforced through ongoing engagement activities.

All grievances will be logged, tracked, and monitored to ensure timely resolution. The Project will also monitor trends in grievances to identify systemic issues and improve the LRP implementation accordingly.

6.1.3 The Cut-Off Date

Given that national legislation does not require the establishment of a cut-off date, and land acquisition for all impacted land plots is currently being carried out and formalized through appropriate national land management documentation, no cut-off date has been established as required under EBRD PR5 and IFC PS5. Based on the current progress of land acquisition process, there was no cut-off date to assess land use and enumeration of land users and their dependence on the affected land. However, it is recommended to establish clear cut-off date when the census will be completed. Any landowner, land user or any PAP who appear after this date may not be considered for provision of compensation and assistance. It is planned that the start of construction will commence in Q1 of 2026 and be completed within 33 months. The cut-off date will need to be set at least 6 months prior to commencement of the construction.

6.1.4 Baseline Data Collection

Baseline data serve to characterize the pre-resettlement living conditions and livelihood patterns of Project-affected households. In line with EBRD PR5 and IFC PS5, a central objective is "to improve, or restore, the livelihoods and living standards of displaced persons." These baseline data establish the benchmark against which the Project's success in restoring and enhancing household living standards and livelihoods can be assessed. When designing baseline data collection, it is essential to define a clear, practical, and measurable set of key performance indicators (KPIs) that capture household living standards and livelihood levels. These KPIs will guide the baseline assessment, subsequent monitoring activities, and the resettlement completion audit.

The collection of baseline data will serve several key objectives in the context of livelihood restoration:

- Identify affected populations: Determine which individuals and households will be displaced and, subject to verification, who qualifies for compensation and resettlement assistance.
- Recognize vulnerability: Identify households and subgroups that may face heightened risks or disproportionate impacts during the resettlement process and may require targeted support.
- Understand community structures: Provide a detailed, gender-sensitive analysis of community organization, leadership, and social dynamics, with attention to poverty, livelihood systems, and local governance.

- Document inventory: Develop a comprehensive inventory of land rights, assets, and resource access that will be affected by the Project, forming the basis for valuation and compensation.
- Record livelihoods: Capture pre-Project livelihood resources, labor division, production systems, and yields to inform the design of livelihood restoration and enhancement strategies.
- Establish benchmarks: Document pre-Project living standards and livelihood conditions to provide a reference point for monitoring displacement impacts and assessing the effectiveness of restoration measures.
- Inform planning and mitigation: Provide the foundation for predicting resettlement impacts and livelihood restoration activities, designing mitigation strategies, and developing a compensation framework, including eligibility criteria, entitlements, and valuation methods.
- Capture community preferences: Identify the preliminary preferences of displaced persons regarding forms of compensation.
- Assess livelihood perspectives: Gather insights from displaced persons on livelihood activities during transition and in the post-resettlement phase.

The following checklist outlines the key categories of baseline data that will be collected to support effective resettlement planning:

- History of land occupation and use, including patterns of settlement and resource utilization.
- Land tenure arrangements, encompassing statutory, customary, formal and informal rights, seasonal usage, as well as gender-specific aspects of land access and ownership.
- Demographic characteristics, such as age, gender, socioeconomic conditions, livelihoods, and occupations.
- Number of affected persons, disaggregated by sex, including economically displaced populations.
- Inventory of affected assets, including land and other resources that will be lost or modified as a result of the Project.
- Land valuation information and local/regional market price data for crops.
- Household composition and characteristics, including health and nutrition status (sex-disaggregated).
- Household land ownership and asset holdings, with gender-disaggregated data.
- Economic activities of households, including subsistence and cash-generating production, use of natural resources, common property, and seasonal activities.
- Household financial status, covering income, expenditure, savings, and debt (sex-disaggregated).
- Access to services, such as education, healthcare, markets, and public transport.
- Access to infrastructure, including water supply, electricity, heating, cooking fuel, and sanitation facilities.
- Local governance and community organizational structures relevant to resettlement.
- Assessment of poverty and vulnerability, particularly within the resettlement context.
- Conflict dynamics and potential sources of social tension.
- Common property resources, ecosystem services, and natural resource use, with an inventory of those affected by the Project.

- Social networks and safety nets, including formal and informal systems of support, particularly those addressing gender-based violence (GBV).
- Cultural heritage resources that may be impacted.
- Displaced persons' perspectives, including aspirations, preferences, and concerns regarding resettlement, ensuring representation of both men and women.
- Attitudes and preferences for relocation and livelihood restoration options.

In the context of the Project, baseline data collection is into stages outlined in **Figure 2**:



Figure 8: Stages of Baseline Data Collection

6.1.4.1 The Census

The census will serve the following purposes:

- Identification of affected parties: Record all individuals, households, and enterprises displaced by the Project and, subject to verification, determine those eligible for compensation and resettlement assistance.
- Vulnerability assessment: Establish a register of households and individuals who may be particularly vulnerable and require targeted support.
- Survey population definition: Delineate the population from which samples will be drawn for household socioeconomic surveys (see *Appendix A* for survey questionnaire draft).

A team of trained enumerators will conduct a detailed census by visiting each affected household, with a particular focus on herder households that may face potential livelihood impacts. They will document essential demographic and socioeconomic information for all household members, including name, age, gender identity, occupation, and their relationship to the household head. Key components of the census exercise include:

- One or more respected village or local district akimat officials, who can verify bona fide local residents, will accompany the enumerators to enhance the accuracy and legitimacy of the process. It is recommended that enumerators take photographs of the household head and any members present during the visit to support household identification and records.
- Global Positioning System (GPS) technology will be used to record the precise location of each household's dwelling(s), which will help confirm census completeness and facilitate follow-up meetings as needed.
- An assessment of household vulnerability will be conducted, focusing on factors such as extreme poverty, elderly members, physical or intellectual impairments, chronic illness, ethnic minority status, or other social marginalization.

- Photographs will be taken of the household head and a collective photo of household members present to document the census accurately.

6.1.4.1.1 Census of Landusers

Despite all formal land users (leaseholders) have been identified by the Client and authorities, and land acquisition is currently in process, a census of formalland users will be conducted. This census aims to identify disadvantaged, or vulnerable formal land users who may experience disproportionate impacts from the Project, face challenges accessing development benefits and opportunities, or encounter difficulties recovering from economic displacement.

6.1.4.1.2 Census of Natural Resources Users

Livestock herders have been identified as the primary natural resource users during the Social Baseline Study. Detailed interviews with these Project Affected Persons (PAPs) will be conducted to better understand the range of natural resource users, the nature and timing of their activities, and their demographic and socioeconomic information. This census is essential to establish eligibility for compensation and livelihood assistance, ensuring these informal land users are appropriately recognized and supported.

6.1.4.2 The Land and Asset Inventory

The land and assets inventory will involve a comprehensive survey and measurement of livestock grazing land and other natural resources that will be lost or restricted due to the Project. The key objectives and tasks of this inventory include:

- Identifying displaced landowners, occupants, and natural resource users, and verifying their tenorial status to ensure proper recognition of rights and claims.
- Surveying and precisely establishing the boundaries of each affected landholder's land plot(s) using appropriate mapping and measurement tools.
- Surveying, measuring, counting, and recording all land parcels and assets each affected landowner or user will lose as a result of the Project.
- Collecting and documenting all relevant parameters necessary for the accurate valuation of land and associated assets to facilitate fair compensation. The inventory will include size, type, condition, and location of land plots, structures, crops, and other improvements.
- Identifying and delimiting common property resources and natural assets that may be lost or subject to access restrictions, ensuring collective resource rights are considered.
- Mapping and recording any cultural heritage sites or assets that will be displaced or affected, including establishing their owners or custodians for appropriate management and mitigation

Land and asset inventory recording form is presented in **Appendix B**.

6.1.4.3 Asset valuation

As reported above, the valuation of affected assets on private land was completed in accordance with national legislation as part of Step 4 of the land acquisition process. Compensation amounts have been agreed between the Client and formal land users (leaseholders) through official agreements, covering most affected users (19 out of 22). However, these amounts currently reflect national legal requirements, which may not align with the replacement cost principle required under IFC Performance Standard 5 (PS5) and EBRD Performance Requirement 5 (PR5). To ensure compliance, the Aktas will review all valuations and compensation against the

replacement cost principle. Where gaps are identified, corrective measures will be implemented, including top-up payments if necessary, to achieve full replacement cost.

The valuation process will be carried out by qualified valuers and will follow international best practice to ensure compensation at full replacement cost, in compliance with IFC Performance Standard 5 and EBRD PR5.

Kazakhstan is considered functional real estate markets because they have strong demand, active transactions, and regulatory improvements that enhance transparency and investor confidence, therefore compensation at full replacement cost will follow the guidelines provided in the following table.

Table 7: Asset valuation - replacement cost per asset

Asset	Compensation at full replacement cost
Land	<p>Comparative method: Value of similar land¹⁰ in comparable transactions in the past six months (Land registry offices usually hold information on recent land transactions (at least five transactions to be used for comparison) or the website of the land registration agency – always to be compared with actual transactions to avoid pay less than true values.</p> <p>As rangeland has been identified in the right of way and might be used under customary regimes, it is generally valued in the range of 10 to 30 percent of the value of cultivated agricultural cropland located in the same area. The income method can be used to provide benchmarks of the difference in value (assessment of future income expected from the land (such as agricultural or rental income) divided by the discount rate (typically the long-term interest rate).</p> <p>+</p> <p>Cost of land preparation to a similar or better condition (may involve clearing, leveling, plowing, access)</p> <p>+</p> <p>Transaction costs (registration, taxes, time lost, cost of transport)</p>

¹⁰ For agricultural land: it should be comparable in general location, soil quality, land capability, agronomic potential, and accessibility. Land can be classified as arable, irrigated arable, pasture, fallow, barren, or other relevant categories. For residential or commercial land: it should be similar in location and economic potential.

Asset	Compensation at full replacement cost
Restricted land ¹¹ and orphan land ¹²	<p>Restriction to land Compensation for the restriction comes in addition to compensation for temporary use and for any lost crops/income from business during construction</p> <p>It is recommended to use common sense to estimate the loss in value caused by restrictions: - The severity of value loss is linked to how the land was previously used and what the restriction prevents.</p> <p>High Impact – Orchards or Tree Crops Restriction: Prohibition on growing trees (e.g., along pipelines or under transmission lines). Effect: Significant loss in value because orchards generate high income. Valuation Method: Calculate average annual income loss from tree crops. Apply an adequate capitalization rate to estimate the present value of future income loss.</p> <p>Low Impact – Grazing Land Restriction: Tree height limits (e.g., cannot grow tall trees). Effect: Minimal or no impact on livelihoods since grazing does not depend on tree height. Valuation Method: Loss in value is low or negligible. Compensation may be symbolic or based on minor adjustments.</p> <p>Construction Restrictions – Farming Still Allowed Restriction: Land cannot be used for building structures but remains available for agriculture. Effect: Moderate impact Valuation Method: Estimate the difference in market value between built-up land (land suitable for construction) and agricultural land (land limited to farming use).</p> <p>Orphan land – which 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 – needs to be compensated in full.</p>
Annual crops	<p>Compensation is based on the gross market value of the harvest.</p> <p>Market Price Survey: Identify local market prices where affected persons sell their crops. Conduct surveys in the closest markets to the project area.</p>

¹¹ Land returned after construction with limitations on use (e.g., no building, no wells, no tall trees) as in the Project case for the pipeline.

¹² Land outside the project footprint that becomes uneconomic due to acquisition (also called severed or unviable land).

Asset	Compensation at full replacement cost
	<p>Price Monitoring: Track price fluctuations over a one-year cycle. Use secondary data from national economic statistics if available. Factor in fluctuations when computing crop value.</p> <p>Annual updates: Update crop compensation rates yearly to reflect price changes.</p> <p>Biennial or triennial crops: Apply the same approach as annual crops. Multiply annual gross product by the number of cycles lost (e.g., tubers, forage crops).</p> <p>Mixed crops: Investigate typical crop mixes (e.g., maize 40%, beans 60%). Devise rates based on: Average ground coverage per crop; Average yield of each crop; Or use local expert opinion for combined yield estimates (experienced agronomists)</p> <p>+</p> <p>Additional Allowances: if replacement land is provided, include a land-preparation allowance in crop compensation.</p>
Perennial crops	<p>Cumulative loss of income experienced between the removal of the tree and its future reinstatement to a similar level of production</p> <p>+</p> <p>Cost of reestablishing the crop ((seedlings, soil preparation, fertilizer, pest control, etc.)</p> <p>The compensation amount G (in monetary terms) is determined by application of the following formula: $G = D + E + F$, with $D = A \times B \times C$ In which: A: Selling price of fruit, in monetary units per kilogram (kg) B: Yield (in kg per tree per year) C: Average time required to reestablish the tree to its previous production level, in years D: Value of lost production, in monetary units: $D = A \times B \times C$ E: Cost of seedling and planting (seedling, soil preparation, and initial fertilization) at the new location, in monetary units F: Cost of labor and inputs required to maintain the crop during the time needed to reestablish it to its previous production level (fertilizer, pest control, pruning, etc.), in monetary units</p> <p>The parameters in the compensation formula are commonly obtained as follows: A (price) is obtained by a survey of regional markets and direct interviews with affected farmers. B (yield) is sourced from local agronomists or agricultural extension workers to obtain the yield per tree. C (reestablishment time) can be obtained from secondary agronomic references, usually available</p>

Asset	Compensation at full replacement cost
	<p>from research institutes and confirmed by the local agronomists.</p> <p>D: For the purpose of calculating D (value of lost production), affected trees are often categorized in three or four categories (e.g., seedling, young nonproductive, and adult productive), each of these being assigned a different value of C in years.</p> <p>E (cost of planting) and F (cost of maintenance, including labor, during reestablishment period) are estimated based on crop agronomic requirements and interviews with affected farmers and local agronomists.</p>
Buildings (not confirmed will be in the land acquisition/restriction plots but to take into consideration whether identified during the additional baseline data collection studies e.g. census and asset inventory)	<p>Traditional Buildings Estimate cost of labor + construction materials. Interview local contractors and project-affected persons (PAPs) to determine labor and cash expenses (e.g., roofing, beams, nails, poles). Check local market prices for essential materials (bricks, cement, corrugated iron sheets, carpentry items). Categorize structures into generic groups and assign average replacement cost or unit area value (For example, category 1: raw bricks, thatch roof; category 2: fired bricks, thatch roof; category 3: raw bricks, corrugated metal roof; category 4: fired bricks, corrugated metal roof). Apply similar method for ancillary structures (granaries, bread ovens, poultry houses, animal sheds).</p> <p>Modern Buildings: Full replacement cost based on detailed bills of quantities. Verify unit rates are up-to-date. Do not apply depreciation coefficients; use “as new” rates. If using central valuation board bills of quantities, ensure rates are current and depreciation removed.</p> <p>+ Adequate housing upgrade: If building does not meet adequate housing criteria (e.g., no toilet, poor materials), include cost of upgrades. Refer to UN OHCHR guidance for adequate housing standards.</p> <p>+ Transaction cost (registration, taxes, time lost, cost of transport)</p>
Businesses	<p>Loss of income experienced between the occurrence of the impact and the time that the business can reasonably be expected to be reinstated (typically three to six months for small businesses in emerging economies) +</p> <p>Cost of physical relocation of equipment and structures, if applicable, and any legal (reregistration) and other costs</p>
Transaction costs	<p>Include the costs of registering the new property, reconnecting utilities at the new location, and reissuing identity documents and other legal papers (by consulting official agencies and utility providers). Also account for indirect costs such as transportation</p>

Asset	Compensation at full replacement cost
	and time lost in completing these formalities. Assess the tax implications of the transaction for affected households and offset any negative impact. If applicable, review the effect on agricultural subsidies and mitigate any adverse consequences.
Moving costs	Include the cost of transporting personal belongings by estimating the average volume and type of assets to be moved. Consider any animals, agricultural equipment, and stored produce that may require relocation. Consult moving companies, or if unavailable, truck or van rental services, and factor in the cost of labour and time lost during the process.

The valuation methodology for determining replacement cost shall be documented and included in relevant resettlement planning documents. Furthermore for categorization of land for the inventory, it is recommended to use categorisations recognised in Kazakhstan or devise a simple categorisation of land (e.g. residential, arable irrigated, arable non irrigated, pasture, forest, barren) with the assistance of local expertise.

Roles and responsibilities for compensation and compliance

To comply with IFC Performance Standard 5 and EBRD PR5, the Project Sponsor (Client) is responsible for:

- Funding and implementing the Livelihood Restoration Plan (LRP) and any gap-filling measures required to meet international standards.
- Covering costs for additional socio-economic surveys, census, asset inventory, and valuation studies.
- Ensuring that compensation reflects full replacement cost and that livelihood restoration measures are in place for all eligible Project Affected Persons (PAPs), including those not recognized under national legislation.

6.1.4.4 Socioeconomic Research Survey

Socioeconomic research and surveys will be performed by LRP development consultant to generate a baseline that will be used throughout the Project's life to assess whether resettlement objectives are met, and livelihoods are, at a minimum, restored. They involve the application of quantitative and qualitative research and survey tools to develop a set of data that describes the socioeconomic conditions, living standards, and livelihoods of Project-affected communities and their potential hosts prior to resettlement. Techniques used for a socioeconomic survey should meet the criteria of reliability, validity, and sensitivity:

- Reliability is the extent to which the survey instrument produces the same results when used repeatedly to measure the same thing. Socioeconomic surveys used to collect resettlement baseline data need to be replicable for monitoring purposes.
- Validity is the extent to which the survey measures what it is intended to measure.
- Sensitivity refers to whether the survey instrument is sensitive enough to measure key changes resulting from a resettlement intervention.

Survey and research designs should include a mix of:

- Quantitative methods (e.g., household socioeconomic questionnaires as proposed in Appendix X)

- Qualitative research:
 - Participatory appraisal (PA) techniques
 - Interviews with PAPs
 - Focus group discussions
 - Case studies

6.1.4.5 Livelihood Baseline and Research Survey

The objectives of livelihood baseline studies are to accomplish the following:

- Identify the sources of livelihood and resources used by all PAPs.
- Describe systems of production, inputs, storage, and handling as well as the seasonal calendar of activities and division of household labor.
- Identify any secondary processing or value adding.
- Quantify production and calculate the value of self-consumed production, products bartered or exchanged, and products sold.
- Identify suppliers and buyers, value chains, and markets used by producers.

6.1.4.5.1 Livestock Production Baseline Data Collection

Livestock specialist and livelihood restoration specialist within LRP development team familiar with local agricultural and animal husbandry activities should be engaged to undertake livelihood baseline studies. The specialist should undertake field investigations using PA techniques, including observations, key informant and focus group discussions, and farmer case studies to collect baseline data on the following:

- Prevailing types of grazing land tenure
- Criteria used by local farmers to select land-use patterns
- Local soil and land capability conditions
- Typical household types of land use and total landholding, pastures or rangeland
- Calendar of livelihood, agricultural, and animal husbandry activities
- Tree and crop varieties and cultivation techniques
- Level of inputs (e.g. hired labor) and use of improved varieties
- Pasture or rangeland rotation and use of fallow land
- Gender roles and division of labor
- Amount of time invested in agricultural and animal husbandry activities versus other activities
- Agricultural risks (e.g. drought, fire, insect infestations; low-input, low output, and low-risk agricultural practices; suitability for introducing high-input and high-output but high-risk agricultural practices as a potential mitigation measure; and so forth)
- Any secondary processing that occurs within the household or community
- Subsistence activities versus cash earning

- Livestock-raising practices and any limiting factors
- Modes of transportation (and costs)
- Markets where produce is sold
- Buyers of produce and pricing arrangements and extent of barter
- Use of common property resources (e.g., for grazing)
- Participation in any cooperatives, farmer's organizations, and other networks for support
- Access to livestock production expertise and extension services

Based on this gathered information, the team should do the following:

- Recommend a rule-of-thumb farm area (based on land-use types plus fallow land) to provide for household food security, for use in identifying and planning replacement grazing land needs.
- Coordinate with other livelihood specialists to develop an understanding of the relative importance of agriculture and livestock production relative to other livelihood activities for household subsistence, cash income, and nutrition.
- Summarize agricultural livelihood opportunities and constraints.

6.1.4.5.2 Gender Considerations

Following risks based on gender-based aspects should be considered during the development of LRP:

- Women frequently depend on communal grazing areas and small-scale farming to support household subsistence needs. The loss or fragmentation of such land can heighten economic vulnerability, particularly in contexts where men's livestock-related activities contribute to household income.
- Households headed by women, often with limited support networks, may face additional pressures in terms of time and resources. These challenges are intensified when they are required to travel longer distances to secure essential resources (e.g., water, fodder) or to access vital services such as healthcare and education.
- Furthermore, the economic and social stresses associated with land loss can amplify existing risks of gender-based violence (GBV). Where access routes become longer or less secure, women may be more exposed to harassment, insecurity, or physical harm.

6.1.4.6 Tentative implementation schedule for LRP development

A tentative implementation schedule for the studies needed for the development of the LRP:

- 1) Census, land and asset inventory & valuation, socioeconomic surveys (household surveys) including livelihood information - Kick-off: As soon as possible as conditions permitting

Following climatic factors should be considered:

- Livestock grazing takes place from late March to October, which is a key consideration for conducting social surveys of local livestock herders.
- Considering the cold winter and potential disruptions, the mobility of survey teams during social surveys may be constrained.

Completion: Before land will be necessary for construction.

2) Development of LRP Drafting period: prior to construction start

Disclosure and Consultation: prior to construction start. The LRP must be disclosed and consulted on with PAPs before any works commence.

6.1.5 Livelihood Restoration and Improvement Strategy

The Livelihood Restoration Plan (LRP) will present a comprehensive Livelihood Restoration and Improvement strategy based on data collected during Baseline Survey studies. Within the Project context, livelihood restoration and improvement will be achieved through a combination of the following objectives:

- Restored or improved income levels
- Restored or improved household food security
- Restored or improved security of tenure
- Restored or improved household health and nutrition
- Improved gender equality in livelihood opportunities
- Restored or diversified income sources
- Restored or improved access to markets
- Restored or improved consumption and diet
- Reduction in the number of households living below the poverty line
- Improved safety in livelihood activities
- Restored or improved resilience to natural or economic shocks

As an effective element of livelihood restoration, the LRP will also address a comprehensive strategy to facilitate access to Project employment. Access to Project employment can provide several benefits:

- A regular and reliable source of cash income
- Integration of workers into the cash economy
- Access to the national social security system
- Opportunities for training and skills development
- Promotion of gender equality within families and communities, contributing to economic and social benefits and reducing the risk of gender-based violence (GBV)
- Creation of shared objectives between the Project and affected communities

Accordingly, the LRP should include:

- Identification of key employment needs
- Employment preparation approaches
- Development of recruitment procedures

6.1.6 Entitlements and Compensation

The LRP should address combination of compensations and assistance allowances to individual Project Affected Persons (PAPs) and their households will depend on their lost source of incomes, the severity of impacts and individual social and economic conditions and vulnerability. Compensation should be paid based on the principle of replacement cost that besides the market value of the lost assets will include all costs the PAPs incurred or shall incur (e.g., transactions registration fees for lands, buildings, business, and other assets, costs for land improvement if relevant, costs for relocation and transportation). Accordingly, the Entitlement Matrix envisages provisions about compensation and additional assistance allowances for eligible PAPs. The Entitlement Matrix shall be reviewed to reflect any new impacts and nuances if detected during the census, socio-economic surveys and inventory if the Project affected assets to be undertaken in preparing and the LRP, following the principles of EBRD PR5/IFC PS5 and provisions of the LRP

Table 8: Entitlement Matrix

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
Agricultural Land: Permanent land loss, access or damage	Inside the WPP site – Installation of WTGs, roads, BESS, O&M compound, substations	Registered leaseholders - The land remains state-owned in Kazakhstan. Leaseholders have a right to use the land for a defined period (e.g. 5 to 49 years), but they do not own the land.	<p>Compensation must be provided at full replacement cost, which includes:</p> <ul style="list-style-type: none"> ■ The market value of the leasehold interest (e.g. the unexpired term of the lease, especially if pre-paid) or Land-for-land replacement (e.g. allocation of a new lease of similar size, quality, and location) ■ Improvements made by the leaseholder (e.g. fencing, irrigation, structures) ■ Transaction costs (e.g. legal fees, registration costs) ■ Loss of income or business interruption if the land was used for productive purposes <p>If the leaseholder is displaced from land used for livelihood (e.g. grazing), they may also be eligible for:</p> <ul style="list-style-type: none"> ■ Livelihood restoration support, such as access to alternative land, training, employment opportunities, or transitional support ■ If the leaseholder is a vulnerable person or household, additional support may be required (e.g. priority in job opportunities, tailored livelihood support) ■ If the leaseholder is sharing land with informal users, both parties may need to be included in the census and asset inventory to ensure fair treatment
		Non-titled APs (e.g. informal herders)	<p>Compensation at full replacement cost for any assets associated with land (e.g., water wells see “Loss of common property resources” below) shall be compensated at values determined by licensed valuers.</p> <p>Plus</p>

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
			<p>Establishment of permanent crossing points over Project access roads in consultation with herders (design and location to be agreed during engagement)</p> <p>Plus</p> <p>Livelihood restoration assistance (e.g. vocational training, targeted measures for vulnerable households)</p>
	<p>Outside the WPP site – access roads, OHTL tower bases</p> <p>Access Roads The access roads will cross agricultural lands, lands within populated areas (cities, towns, and rural settlements), and reserve lands. Therefore, these lands may belong to registered leaseholders or be used by non-titled users.</p> <p>Overhead Transmission Line (OHTL) tower bases The tower bases will be located on agricultural land, forest land, and reserve land.</p>	Registered leaseholders - if confirmed by census and asset inventory	<p>Compensation must be provided at full replacement cost, which includes:</p> <ul style="list-style-type: none"> ■ The market value of the leasehold interest (e.g. the unexpired term of the lease, especially if pre-paid) or Land-for-land replacement (e.g. allocation of a new lease of similar size, quality, and location) ■ Improvements made by the leaseholder (e.g. fencing, irrigation, structures) ■ Transaction costs (e.g. legal fees, registration costs) ■ Loss of income or business interruption if the land was used for productive purposes <p>If the leaseholder is displaced from land used for livelihood (e.g. farming, grazing), they may also be eligible for:</p> <ul style="list-style-type: none"> ■ Livelihood restoration support, such as access to alternative land, training, employment opportunities, or transitional support ■ If the leaseholder is a vulnerable person or household, additional support may be required (e.g. priority in job opportunities, tailored livelihood support) <p>If the leaseholder is sharing land with informal users, both parties may need to be included in the census and asset inventory to ensure fair treatment</p>
	Outside the WPP site	Non-titled APs - if confirmed by	Compensation at full replacement cost for any assets associated with land (e.g., crops,

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
		census and asset inventory	structures etc) shall be compensated at values determined by licensed valuers. Plus Livelihood restoration assistance (e.g. vocational training, targeted measures for vulnerable households)
Non-Agricultural Land Commercial - land loss	Inside the WPP site – Installation of WTGs, roads, BESS, O&M compound, substations Not expected however to be confirmed by the census and asset inventory	Registered leaseholders - The land remains state-owned in Kazakhstan. Leaseholders have a right to use the land for a defined period (e.g. 5 to 49 years), but they do not own the land.	<ul style="list-style-type: none"> ■ Compensation for the value of the remaining lease term (especially if pre-paid or if the lease has market value) ■ Compensation for any structures, buildings, or improvements they have made (e.g. shops, fences, utilities) ■ Compensation for business losses (e.g. lost income, relocation costs, re-establishment costs) if applicable ■ Transitional support (e.g. moving assistance, temporary accommodation or business premises) Livelihood restoration support if their business or income-generating activity is affected
		Non-titled APs	Compensation at full replacement cost for any assets associated with land (e.g., water wells see “Loss of common property resources” below) shall be compensated at values determined by licensed valuers. Plus Livelihood restoration assistance (e.g. vocational training, targeted measures for vulnerable households)
	Outside the WPP site – access roads, OHTL tower bases Access Roads The access roads will cross agricultural lands, lands within populated	Registered leaseholders - if confirmed by census and asset inventory	<ul style="list-style-type: none"> ■ Compensation for the value of the remaining lease term (especially if pre-paid or if the lease has market value) ■ Compensation for any structures, buildings, or improvements they have made (e.g. shops, fences, utilities) ■ Compensation for business losses (e.g. lost income, relocation costs, re-establishment costs) if applicable

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
	areas (cities, towns, and rural settlements), and reserve lands. Therefore, these lands may belong to registered leaseholders or be used by non-titled users. Overhead Transmission Line (OTHL) tower bases. The tower bases will be located on agricultural land, forest land, and reserve land.		<ul style="list-style-type: none"> ■ Transitional support (e.g. moving assistance, temporary accommodation or business premises) ■ Livelihood restoration support if their business or income-generating activity is affected
		Non-titled APs - if confirmed by census and asset inventory	If not primary residence/income: compensation for assets only. If primary: one-time cash allowance (12 months subsistence).
Agricultural Land: Permanent land use restriction – easements	Only Outside the WPP site – OHTLs RoW will be located on agricultural land, forest land, and reserve land.	Registered leaseholders if confirmed by census and asset inventory	<p>Compensation at full replacement cost for full replacement cost for the diminished land use due to permanent restriction to land use therefore the difference in market value between the category of land identified (e.g. land suitable for perennial crops) and agricultural land (land limited to farming use) for construction and operation.</p> <p>The compensation is based on the severity of the restriction. Please refer to Asset valuation section above.</p> <p>Plus</p> <p>Buy-out at full replacement cost option if land becomes unviable (orphan land).</p> <p>Plus compensation for loss of crops, see below</p>
Temporary Impact – construction land occupation	Inside the WPP site – construction camp compound, MV cable trenches, 35kV Temporary OHTL	Leaseholders	Any temporary impact caused by the use of land will be regulated by private agreements between the Contractor and the leaseholder
		Informal herders	<p>Livelihood Restoration Assistance:</p> <ul style="list-style-type: none"> ■ Support to offset temporary loss of grazing access (e.g. provision of alternative grazing areas, fodder support, or temporary access routes).

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
			<ul style="list-style-type: none"> ■ Compensation for any verifiable losses (e.g. increased costs of livestock feeding or transport) <p>Consultation and engagement: Informal herders must be consulted and informed in advance of construction activities and regular consultations with herders regarding access to grazing areas throughout construction will be carried out.</p> <p>Their concerns and suggestions for mitigation (e.g. timing of works, access routes) must be considered</p> <p>Grievance Mechanism: A functioning grievance redress mechanism must be available to allow informal herders to raise concerns and seek resolution</p>
Temporary Impact – Agricultural construction land-land occupation	Outside the WPP site – OHTLs on agricultural land	leaseholders, if confirmed by census and asset inventory	<p>Compensation at full replacement cost for</p> <ul style="list-style-type: none"> ■ Temporary loss of access to leased land ■ Damage to or loss of standing crops (at full replacement value) ■ Lost income or productivity during the period of construction-related disruption ■ Land must be returned to pre-project condition (e.g. topsoil replacement, removal of debris) to enable resumption of agricultural use ■ If temporary loss results in significant income disruption, additional support may be required (e.g short-term employment, or transitional assistance) ■ Consultation and grievance redress: Leaseholders must be consulted in advance and have access to a grievance mechanism to raise concerns or claims
	OHTL construction corridors	Informal herders, if confirmed by census and asset inventory	<p>Access maintained where possible. Regular consultations with herders, regarding access to grazing areas throughout construction will be carried out.</p> <p>Compensation for demonstrable losses (e.g. fodder).</p>

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
Temporary Impact – Non-Agricultural Land	Outside the WPP site – OHTLs on agricultural land, reserve land, forest fund land Whether any small informal business is found located along construction areas, it could experience temporary disruption. For instance, a farm-based workshop; if confirmed by census and asset inventory	Business owners and employees (formal/informal) if confirmed by census and asset inventory	<p>Business owners: compensation for verifiable income loss during the disruption period.</p> <p>Employees: compensation for lost wages or temporary unemployment if business operations are suspended.</p> <p>Assistance with Temporary Relocation (if needed):</p> <ul style="list-style-type: none"> ■ Support to move movable structures (e.g. kiosks, workshops) to a nearby location. ■ Restoration of access or signage to maintain customer flow where feasible. <p>Livelihood Restoration Support (if applicable):</p> <ul style="list-style-type: none"> ■ If disruption significantly affects livelihoods, additional support may include temporary employment, training, or access to alternative income-generating opportunities. <p>Consultation and grievance redress:</p> <ul style="list-style-type: none"> ■ Advance notice of construction activities and potential impacts. ■ Access to a grievance mechanism to raise concerns or request additional support.
BUILDINGS AND STRUCTURES			
Residential structures/assets	Inside the WPP site Not identified by baseline surveys	N/A	N/A
	Outside the WPP site Not expected, (if any identified)	All AHs (regardless of legal status)	<p>Replacement structure/ apartment corresponding or improved in size and in quality to the lost living space, registered as ownership in the name of the previous owner (security of tenure), in the Cadastre.</p> <p>OR</p> <p>Cash compensation for the residential structure/ apartment at full replacement cost</p>

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
			free of depreciation and transaction costs, determined by certified valuers. Plus <ul style="list-style-type: none"> - Discomfort allowance - Assistance in relocation free of charge OR moving allowance in cash compensation by the contractor (transportation values at current market prices)
Non-residential structures/assets	Inside the WPP site – seasonal herders' yurts	All APs (regardless of legal status)	Compensation at full replacement cost for dwellings or reconstruction. Plus <ul style="list-style-type: none"> -In case of relocation, provide support in identifying alternative locations with access to water wells. -Assistance in relocation free of charge OR moving allowance in cash compensation by the contractor (transportation values at current market prices) -livelihood restoration assistance as the structures are connected to income and grazing livestock activities that will be lost.
Non-residential structures/assets	Outside the WPP site – business structures	Business owners	Full replacement cost for the business structures and relocation assistance.
LOSS OF COMMUNITY INFRASTRUCTURE/COMMON PROPERTY RESOURCES			
Loss of Common Property Resources	Water wells (inside WPP site)	Informal herders	Reconstruction in consultation with users. New wells operational before closure. Equipment provided.
LOSS OF INCOME AND LIVELIHOOD			
Crops	Outside the WPP site – OHTLs temporary construction impacts - if confirmed by census and asset inventory	All APs (including informal)	Cash compensation at market rate for expected harvest for the construction period.
Trees	Outside the WPP site – if confirmed by census and asset inventory	Tree owners	Cash compensation based on type, age, and productive value.

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
Business/Employment	Outside the WPP site – if confirmed by census and asset inventory	Business owners and employees	Permanent: 1-year net income or 12 months subsistence. Temporary: income for months of stoppage. Employees: 3 months wages or subsistence.
ALLOWANCES			
Severe Impacts	>10% loss of productive assets or physical relocation - if confirmed by census and asset inventory	All severely affected AHs including informal settlers	Agricultural: 1 year's crop yield or 3 months subsistence. Other income: 3 months subsistence.
Livelihood Restoration	>10% loss of agricultural assets - if confirmed by census and asset inventory	All severely affected AHs including informal settlers	2 years of crop/tree yield or 3 months subsistence.
Livelihood Restoration	>10% loss of non-agricultural assets - if confirmed by census and asset inventory	All severely affected AHs including informal settlers	3 months subsistence.
Relocation/Shifting	Transport and transition costs	All AHs to be relocated	An allowance covering transport and livelihood expenses for the transitional period. (e.g. vehicle hire charge plus minimum subsistence allowance for 3 months)
Vulnerability Allowance	Vulnerable AHs (e.g. poor, female-headed, disabled)	Vulnerable AHs	One-time minimum subsistence allowance in cash for 3 months and employment priority in project-related jobs where feasible. Additional assistance in kind will be provided to facilitate relocation or transition – this may include (logistics, relocation planning, assistance with replacement housing search, as appropriate)
Unforeseen Impacts	Construction impacts outside RoW	All APs	Due compensation to be assessed and paid when the impacts are identified based on the above provisions and on the requirements of EBRD PR 5.
Spoil Disposal Areas	Permanent impacts	APs using pasture land	Any permanent impact on land caused by the use of land for permanent disposal of unsuitable material or debris remaining after demolition of existing parts of the road, will be adequately compensated as per the provisions to be set up in the LARP.

Type of Loss	Application Scenario	Affected Persons / Households	Compensation Entitlements
			In addition, adequate livelihood assistance for loss of hay and grazing grounds, if any, will be assessed and provided during implementation.

6.1.7 Monitoring

The LRP will include a monitoring plan that will include timely information about whether compensation, livelihood restoration, and other measures are being delivered in accordance with LRP commitments, and whether key outcomes are achieved.

6.1.7.1 Internal Monitoring

The Client will conduct regular internal monitoring and provide Semi-Annual Monitoring Reports to the Lender(s) for review and approval and the disclose it semiannually in their official website in for the entire duration of the Project to monitor and report on any emerging LAR issues and complaints during the Project implementation. Responsibility for providing the Bank with monitoring reports remains with the client, even where land acquisition and resettlement are implemented by a third party, such as the government.

The indicators to be used for monitoring include:

- payment of compensations and assistance
- information disclosure and meaningful consultations and participation
- grievance redress
- budget and timeframe
- other provisions stated in the LRP.

The monitoring reports shall reflect the progress in compensation payments and implementation of the LRP up to date, as well as any problems encountered and suggestions for corrective actions.

Information for monitoring should be collected directly from the field through AHs about the progress of LRP implementation including complaints or inquiries of AHs and other PAPs. The Project should monitor and audit the land acquisition process in different stages and will work based on the following indicators to measure the progress. A third-party audit on the affected landowners/users condition post land acquisition should be undertaken to cover the items defined in the LRP. The monitoring plan could following indicators as defined in

Table 9: Internal Monitoring Indicators

Indicator	Measured how	Frequency	Responsibility
Input Indicators			
Overall spending on livelihood restoration activities	Financial records	Quarterly	Social Specialist

Indicator	Measured how	Frequency	Responsibility
Distribution of expenditure by category (planning & surveys, cash or in-kind compensation, livelihood restoration, vulnerable groups, implementation services including engagement and grievance management)	Financial records	Quarterly	Social Specialist
Headcount of full- and part-time staff and consultants dedicated to compensation and livelihood restoration	HR records	Quarterly	HR, CLO
Output indicators			
Number of affected households and/or people by category and sex	Census, grievance management records, compensation records	Quarterly	CLO
Number of households and people (sex-disaggregated) receiving livelihood-restoration training or assistance in the period, by type (e.g., agriculture, business)	Project data management system	Quarterly	CLO
Grievances opened and closed in the period, and trends over time	Grievance log	Quarterly	CLO
Use of compensation by recipients, including gender dimensions	Annual survey of compensated households or focus groups with PAPs	Yearly	Social Specialist, CLO
Household income restoration status	Annual survey of occupations and income for a stratified sample of resettled households and comparison with baseline; and/or qualitative focus groups	Yearly	Social Specialist, CLO
Vulnerability status changes (newly vulnerable, improvement among previously identified vulnerable households)	Annual household survey and case management records	Yearly	CLO
Business re-establishment (including agricultural activities)	Survey a sample of businesses and compare with baseline	Yearly	CLO
Employment retention in relocated businesses	Employee surveys across a sample of businesses	Yearly	CLO

Indicator	Measured how	Frequency	Responsibility
	and comparison with baseline		

6.1.7.2 External Monitoring

6.1.7.2.1 Compliance Reviews

Compliance reviews conducted by external experts check whether the implementation of the program complies with the LRP and with the lenders' standards. Compliance reviews of the LRP may be undertaken on a stand-alone basis or as part of a broader Project social and environmental compliance review. Compliance reviews are based on the internal monitoring activities, particularly indicators and surveys, developed and conducted by the Project. The scope of work of compliance reviews for resettlement and livelihood restoration should include the following:

- Assess overall compliance with LRP objectives and commitments as well as lender policies and standards on land acquisition and involuntary resettlement.
- Verify progress on the recommendations that the external compliance reviewer made during previous visits.
- Interview a representative cross-section of affected households and enterprises to:
 - Gauge the extent to which the standards of living and livelihood of displaced households for men and women have been improved or restored.
 - Measure whether men and women in households have been sufficiently informed and consulted with.

6.1.7.2.2 Completion Audit

Completion audits assess whether a resettlement program is complete, objectives have been met, commitments delivered, and any corrective actions are needed to achieve targeted outcomes. The completion audit will be conducted by a resettlement specialist or group of specialists that have not been previously involved with the Project that is being audited. The completion audit draws on the data generated by ongoing internal monitoring and the findings of the external compliance reviews. The LRP will define clear, measurable, and realistic completion indicators. Baseline and completion audit surveys gather data pertinent to the completion indicators as the basis for assessing completion. Key objectives of the completion audit are 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 LRP.
- Verify that all entitlements and commitments described in the LRP have been delivered and verify that delivery of compensation and livelihood restoration measures was transparent, equitable, and prompt.
- Determine whether LRP measures have been effective in restoring or enhancing affected persons' living standards and livelihoods, including both men and women and vulnerable people.

6.1.8 Implementation Schedule

LRP must include an implementation schedule of the livelihood restoration measures. The following information should be presented:

- Main resettlement tasks
- Start date, duration, and planned completion date for each task (including SEs and consultation)

- Any important dependencies between tasks
- The relation of resettlement activities to the general Project construction schedule

The schedule should also include key consultation and negotiation milestones and the duration of livelihood-restoration activities, as well as the timing of external monitoring reviews and, where applicable, the LRP completion audit.

6.1.9 LRP Budget

LRP must present a comprehensive budget showing all costs associated with resettlement planning and livelihood restoration implementation. The budget should itemize provisions for the following:

- Land acquisition and compensation:
 - Agricultural land acquisitions
 - Industry land acquisitions
 - Forest fund land acquisitions
- Livelihood restoration and improvement (e.g. educational and vocational training programs for the PAPs who lost source of income, support to nonagricultural income-generating activities (including for women))
- Permitting and approvals
- Statutory fees, registration costs, and so forth
- Monitoring and evaluation:
 - Internal monitoring
 - External monitoring
 - LRP completion audit
- Internal staffing and inputs:
 - Cost of staffing the program
 - Inputs such as vehicles for staff
- Consulting fees:
 - Surveying
 - Appraisal and valuation studies
 - LRP and other specialists
- Contingencies (typically in the range of 10 to 20 percent)

Signature Page

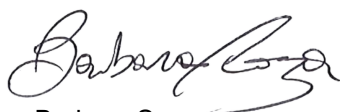
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Appendix A. Census Form

HOUSEHOLD FORM NUMBER:

Enumerator: Date: Signature:

Checked by: Date: Signature:

Inputted by: Date: Signature:

1. IDENTIFICATION OF AFFECTED PROPERTY

GPS Coordinates:

Location:

Cadastral references of plot:

Section:

Number:

Type of property:	Agricultural plot	Residential plot with residential building	Plot with business
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Check applicable box

Related forms in the household dossier:

- Affected plot form number(s):
- Affected structure form number(s):
- Affected business form number(s):

Photograph of head of household (HHH):

Camera or card number: File name(s)

2. IDENTIFICATION OF AFFECTED HOUSEHOLD

Head of household: Full Name:

HHH's identity document: Type: Number: Issued on: / / In:

	Full name	Relationship with HHH*	Year of birth	Gender	Occupation **	Usual residence
1		HHH				
2						
3						
4						
5						

*: 1: Spouse 2: Child 3: Parent 4: Grandparent 5: Grandchild 6: Other

**: Codes of occupations:

- | | | |
|--|--|-------------------------------------|
| 1: Farmer | 6: Akimat employee | 11: Student in primary school |
| 2: Agricultural laborer | 7: Employee of private business | 12: Pre-school age child |
| 3: Housewife | 8: Pensioner | 13: Unemployed—does not work at all |
| 4: Small self-employed businessperson (except agriculture) | 9: Student in university or other higher education | 14: Unemployed—works occasionally |
| 5: Government or local authority employee | 10: Student in secondary or vocational school | 15: Other (specify) |

3. LIVELIHOOD

In which of the following categories does the average total monthly income of your whole household fall:

Less than	Between and	Between and	Between and	More than
-----------	----------------	----------------	----------------	-----------

In case there are several bread earners in the household, consolidate them

Which are your main sources of income? (1: highest source; 2: second highest source; 3: third highest source)

Salaries	Agriculture production	Small business	Remittances
Pensions	Government or other assistance	Other (specify):	Other (specify):

Which are your main sources of expense? (1: highest expense; 2: second highest expense; 3: third highest expense, etc.)

Food	Housing (mortgage or rent)	Utilities (water, power, telephone)	Taxes	Transport
Education	Health	Clothing	Other (specify):	Other (specify):

Applies only to household expenses; small business expenses not to be considered here

Do you produce some of your food needs: Yes / No Specify
what and how significant it is:

Are there periods of time when it is really difficult to meet basic needs: Yes / No

4. VULNERABILITY

Is anyone in the household suffering from one of the following problems:	Physical handicap	Mental handicap	Chronic disease requiring regular medical attention	Chronic disease requiring hospitalization	Other problem (specify):
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Indicate number of affected household member(s) per the table in section 2 in the relevant box

5. COMPENSATION PREFERENCES

Make it clear to interviewee that at this stage this is indicative only

- Full resettlement (land and house)
- Provision of land and cash compensation for house
- Cash compensation
- Other (specify):
- Does not know

Appendix B. Asset Inventory Form

PLOT FORM

PLOT FORM NUMBER:

Enumerator: Date: Signature:

Checked by: Date: Signature:

Inputted by: Date: Signature:

1. DESCRIPTION OF AFFECTED PLOT

Location:

Cadastral references of plot: Section: Number:

Photograph of plot: Camera or card number: File name(s)

Downloaded and renumbered to: By: Date: / /

Total size: m2 Wholly affected: Yes / No If no, size of the remainder: m2

Current usage:	Mainly residential	Mainly agricultural	Forest	Pasture	Mainly business	Unused	Other (specify)
----------------	--------------------	---------------------	--------	---------	-----------------	--------	-----------------

Check applicable box

2. OWNERSHIP

Regime of ownership and reference documents:	With fully registered title	Title in progress	Formal lease of public property Owner:	Formal lease of private property Owner:
	Informal lease Owner:	Other, specify:	Shared ownership YES / NO	If yes, other shareholders:

Check applicable box; and include reference and date of document presented by occupant in the relevant box

STRUCTURE FORM

STRUCTURE FORM NUMBER:

Enumerator: Date: Signature:

Checked by: Date: Signature:

Inputted by: Date: Signature:

1. DESCRIPTION OF AFFECTED STRUCTURE

Location:

Cadastral references of plot: Section: Number:

Photograph of plot: Camera or card number: File name(s)

Downloaded and renumbered to: By: Date: / /

Detached building: YES/NO Apartment in larger house: YES / NO

Current usage:	Mainly residential	Mainly agricultural	Industrial	Commercial	Recreational	Unused	Other (specify)
----------------	--------------------	---------------------	------------	------------	--------------	--------	-----------------

Check applicable box

Outside dimensions (m): Built in year:

General condition: Outside: Inside:

1: new or very good 2: fair 3: poor 4: ruin, unusable

Materials	Walls	Roof	Floor inside
-----------	-------	------	--------------

2. FOR RESIDENTIAL STRUCTURES ONLY

Living space (m²): Number of rooms:

Count lounges and bedrooms only; exclude kitchens, bathrooms, and storage space

Utilities	Connection to public water network	Connection to public power grid	Connection to telephone lines	Connection to public sewerage	Running water in house	Flush toilet in house
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

Heating system:

3. REGIME OF OWNERSHIP/ OCCUPATION

Regime of ownership and reference documents:	With fully registered title	Title in progress	Formal lease of public property Owner:	Formal lease of private property Owner:
	Informal lease Owner:	Other, specify:	Shared ownership YES / NO	If yes, other shareholders:

Check applicable box; and include reference and date of document presented by occupant in the relevant box

BUSINESS FORM

BUSINESS FORM NUMBER:

Enumerator:	Date:	Signature:
Checked by:	Date:	Signature:
Inputted by:	Date:	Signature:

1. DESCRIPTION OF AFFECTED BUSINESS

Photograph of business: Camera or card number: File name(s)

Type of business: Year of establishment:

1: General retail 2: Specialized retail (specify area) 3: Minimarket or supermarket 4: Whole sale (specify area) 5: Telephone booth/internet cafe	6: Artisanal work (specify activity) 7: Transportation-related activity (provide details) 8: Services to agriculture 9: Construction contractor (specify area if needed) 10: Petrol station	11: Restaurant, bar, cafe 12: Hotel, inn, guesthouse 13: Other (specify)
---	---	--

Provide details on business size and activity as appropriate:

Does the business use an affected structure or plot: Yes / No

If Yes, Structure or plot reference:

Other affected immovables used by the business:

Example: Underground fuel storage

How many full-time employees does the business have: Part-time employees:

Include only those paid a salary, not including owners, operator, or family helpers who are not paid a salary

2. LEGAL ASPECTS

Business is formally registered: YES / NO

IF BUSINESS IS FORMAL:

Legal form of business:

Tax registration number:

Owners (shareholders):	_Share:	%
	_Share:	%
	_Share:	%
	_Share:	%

Operator if different from owner (name, address):

Above information is checked by enumerator from legal documents presented by owner: YES / NO

IF BUSINESS IS INFORMAL:

Owner:

3. ECONOMICS OF THE BUSINESS

In average over the last three years:

Typical sales	Typical expenses	Typical income
---------------	------------------	----------------

Specify unit and period (example: KZT/year)

Above numbers from documents: YES / NO. If yes, what documents:

Comments:

Appendix C. Livelihood Questionnaire Draft

Simplified Livelihood Questionnaire — Affected Household

- 1) Cadastral number of affected land plot(s): _____
- 2) Village: _____
- 3) Total surface of affected plot: _____ ha
- 4) Full name of household head: _____
- 5) Permanent address: _____
- 6) Telephone number: _____
- 7) Mobile: _____
- 8) Composition of household (to include ALL who live in the family, but not co-owners of the affected land plot who do not physically live in the surveyed household).

Household (HH) member	HH head	HH member	HH member	HH member	HH member	HH member	HH member	HH member
Relationship to HH head								
Age								
Gender								
Primary occupation								
Educational level								
Disability or chronic health conditions								

Relationship to Household Head: a. Spouse; b. Son or Daughter; c. Father or Mother; d. Brother or Sister; e. grandkids; f. Other

Primary Occupation: a. Farmer; b. Pensioner; c. Unemployed; d. Civil Servant; e. Business (non-farming);

f. Housekeeper; g. Temporary/add hoc jobs; h. Other

Educational Level: a. Primary; b. Secondary; c. Technical; d. Higher (univ/institute); e. None (primary not completed)

Disability: a. Person with a severe disability (1st category); b. Person with a moderate disability 2nd Category; c. Person with a mild disability 3rd Category; d. Person with other disabilities or chronic health conditions
What is the first source of expenditures of your household? _____

Mark one: a. Food; b. Housing; c. Schooling or university expenses; d. Utilities; e. Health; f. Farming expenditures (including livestock); g. Business Expenditures; h. Transport; i. Other

9) Average Monthly Expenditures (KZT):

Food	₸
Housing	₸
Schooling or university expenses	₸
Utilities	₸
Health	₸
Farming expenditures or related to livestock	₸
Business	₸
Transport	₸
Other	₸

10) Tenure of the affected plot:

Check where applicable

You own it and you use it yourself	You own it and you rent it out to somebody else	You rent it from the state or municipality	You rent it from a private owner

12) Tenure of the affected plot:

You own it and you use it yourself	You own it and you rent it out to somebody else	You rent it from the state or akimat	You rent it from a private owner
------------------------------------	---	--------------------------------------	----------------------------------

Check where applicable

13) Do you use the affected plot for agriculture? Yes / No _____

14) If you answered to question in item 13, what do you use the affected plot for? _____

a: Not used; b: Residence; c: Agricultural building; d: Industrial or commercial building; e: Other

15) Is the affected plot mainly used for your own food needs/consumption? Yes / No _____

16) What is the total surface of your agricultural land (including this affected plot and all others):

Total: sum of all listed below _____ ha

Land/Cadastre code of land parcels owned

Affected land code	_____	ha	_____	/surface
Other land(s) code	_____	ha	_____	
Other land(s) code	_____	ha	_____	
Other land(s) code	_____	ha	_____	
Other land(s) code	_____	ha	_____	
Other land(s) code	_____	ha	_____	

17) What is the average yearly income of your household from agriculture:

Cattle (meat, milk, etc.)	_____ ₺
Milk products (cheese, etc.)	_____ ₺
Other	_____ ₺

18) What is your annual average total income, including agriculture (above); paid job, temporary /seasonal jobs; unofficial services/jobs (cutting hay for neighbors, etc.) _____ ₺

19) In enumerator's assessment (not a question), is there potential for vulnerability in this household: Yes / No.
If yes, go to question 20.

20) Please explain the type of vulnerability: _____

a: Elderly; b: Invalid; c: Very poor, cannot cope with their basic needs; d: Female-headed household; e: Flagged by local authorities; f: Other

21) In the last five years has the affected plot been subject to any of the following?

a. Flooding; b. Erosion; c. Landslips; d. Overgrazing; e. Drought

22) How do you access the plot? (coded answer)

a: By foot; b: By animal e.g. horse, donkey; c: By private vehicle; d: By public vehicle

Name of the enumerator: _____ Date of the survey: _____

APPENDIX D. Grievance Form

Reference No:	
Full Name	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail: _____
Language Please mark your preferred language for communication	Kazakh/Russian Other
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	



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