

LAND ACQUISITION FRAMEWORK

Mafrq Combined Cycle Gas Turbine (CCGT) Thermal Power Plant



REV-3

September 2026

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ABBREVIATION AND ACRONYMS

Acronym	Definition
AIIB	Asian Infrastructure Investment Bank
BOO	Build, Own and Operate
CCGT	Combined Cycle Gas Turbine
DLS	Department of Lands and Surveys
EBRD	European Bank for Reconstruction and Development
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
IFC	International Finance Corporation
IFI	International Finance Institutions
IPP	Independent Power Project
LAF	Land Acquisition and Framework
MEMR	Ministry of Energy and Mineral Resources
NEPCO	National Electric Power Company
OHTL	Overhead Transmission Line
PAP	Project-Affected Person
PS	Performance Standard
REOL	Real Estate Ownership Law
RF	Resettlement Framework
SEP	Stakeholder Engagement Plan
WAJ	Water Authority of Jordan

KEY DEFINITIONS

Affected Persons	Any individual, persons, family, household, group, or collective body that is affected by either physical or economic displacement and are deemed eligible to resettlement assistance and/or compensation under this RF.
Asset Inventory	The investigation and measuring of all land, interest on and rights to that land, as well as any assets and unexhausted improvements on that land. The Asset Inventory forms the basis for the determination of resettlement assistance and/or compensation to be granted to Affected Persons.
Allowances	Additional cash compensation provided in addition to any resettlement assistance and/or compensation provided for the loss of assets, and generally provide transitional support while Affected Persons restore their living conditions and livelihoods after resettlement.
Compensation	The forms or combination of cash or in-kind replacement assets to be provided to Affected Persons to compensate the acquisition of land or the loss of assets. In most cases, compensation denotes cash only.
Economic Displacement	The loss of assets or access to assets that leads to loss of income sources or livelihoods but does NOT necessarily result in the direct loss of a place of residence.
Eligible Persons	See Affected Persons
Entitlement Framework	A framework that establishes the specific entitlements (i.e. forms of compensation) granted to Affected Persons whom will lose proven assets, as determined during the Asset Inventory.
Household Census	The registration of Affected Persons and the collection of their details and forms the basis for the confirmation of Affected or Eligible Persons.
Improvements	Anything resulting from expenditure of capital or labour and includes carrying out of any building, engineering, clearing, improvement, or other operations in, on, over, or under land, or the making of any material change in the use of any building or land and charges for services provided and other expenses incurred in the development or towards the development of land.
Livelihoods	The daily activities adopted by members of households that support the generation of cash income or the securing of household food needs.
Livelihoods Restoration	A range of measures and programs that ensure that the existing livelihoods of Affected Persons is restored, or ideally improved, during and after the resettlement process.
Physical Displacement	The displacement, loss, or destruction of the place of residence as a direct result of the development of the Project.
Project-affected household	All members of a household, whether related or not, operating as a single economic unit, who are affected by a project.
Relocation	Rebuilding housing, assets, including production land, and public infrastructure in another location.
Replacement cost	The rate of compensation for lost assets must be calculated at full replacement cost, that is, the market value of the assets plus transaction costs.
Land Acquisition Framework	A framework document that defines the principles and steps to be adopted in the development of a Land Acquisition Action Plan. The framework is only a precursor to the Action Plan and does not replace it.
Land Acquisition Action Plan	A detailed action plan that establishes the measures to be adopted by the Project in the implementation of any acquisition, resettlement and compensation.

Stakeholders	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Vulnerable groups	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by land acquisition than others and who may be limited in their ability to claim or take advantage of land acquisition assistance and related development benefits.

1. BACKGROUND

1.1 Summary Project Description and Location

The IPP7 project (“hereafter to as Project”) is a 700 MW Combined-Cycle Gas-Fired (CCGT) power plant in Northern Jordan, developed under a Build-Own-Operate (BOO) model by Etihad Development Company (hereafter referred to the ‘Developer’) (a wholly owned subsidiary of UAE-based Etihad Water and Electricity, or EtihadWE). The Project is structured as a joint venture with the Jordanian government holding a 49% stake and the private partner (EtihadWE) holding the majority. The off-taker will be Jordan’s National Electric Power Company (NEPCO) under a 25-year Power Purchase Agreement (PPA). The fuel is natural gas imported from Egypt with a dedicated supply point being developed by Jordanian Egyptian company Fajr, which is expected to be ready by mid-2027.

Project agreements were endorsed by Jordan's Cabinet of Ministers in early 2026. Once operational, it is expected to supply around 10% of Jordan's total electricity demand, helping meet growing power needs and enhance energy security through private-sector participation.

This fits into Jordan's strategy of expanding Independent Power Projects (IPP) to diversify and strengthen its power generation capacity, which involves both renewable and fossil sources.

The Project is located approximately 23 km to the South-East of Irbid town in Northern Jordan (approximately 55 km to the North of Jordan's capital city Amman). The following map shows the location of the Project within Northern Jordan. Further details on the Project are provided in 'Chapter 5' of the ESIA.

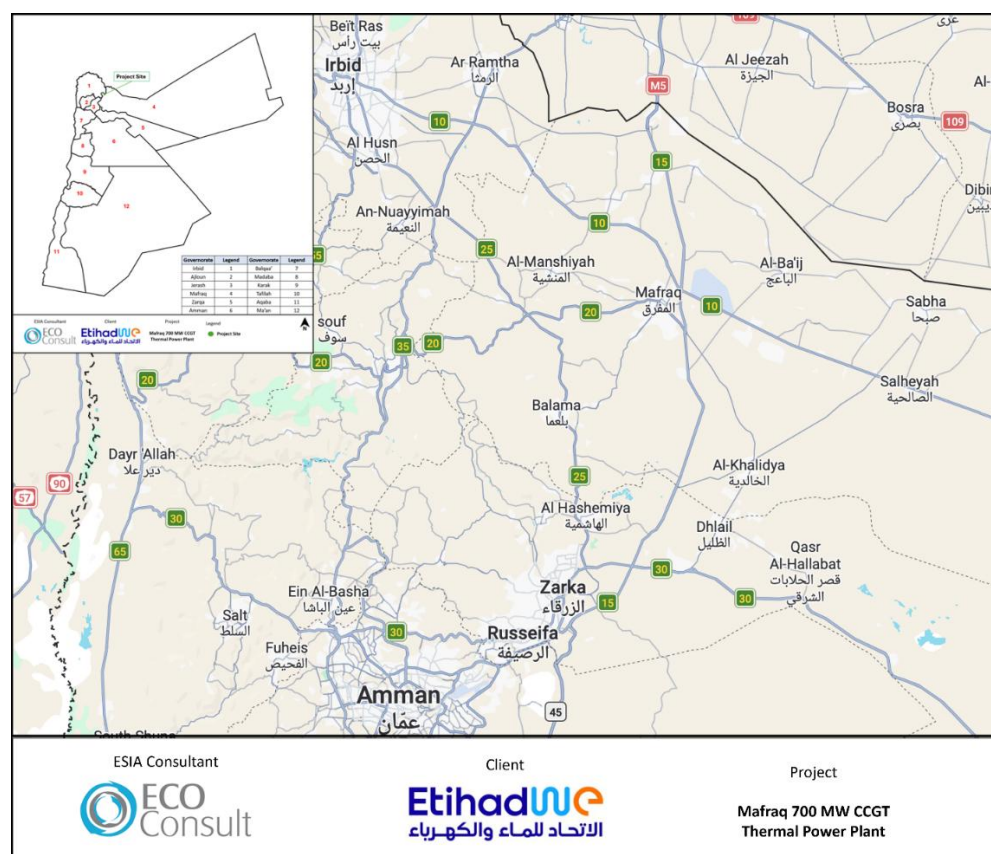


Figure 1: Project Location within Northern Jordan (Source: Google Maps)

1.2 Lender Environmental and Social Requirements and Project Category

The Project will be seeking financing from International Financing Institutions (IFIs). Therefore, the Developer wishes to design and manage the Project in accordance with relevant international Environmental and Social (E&S) standards and requirements. At the time of writing, the IFIs providing financing comprise the International Finance Corporation (IFC) and the Asian Infrastructure Investment Bank (AIIB).

For the purpose of the ESIA, the relevant international E&S requirements are based on IFC's requirements, including the IFC Policy on Environmental and Social Sustainability (2012), IFC Performance Standards (2012), and relevant IFC Environmental, Health and Safety (EHS) Guidelines, as well as AIIB's Environmental and Social Framework (ESF).

The E&S Package includes:

- Environmental and Social Impact Assessment (ESIA) for the Project
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Action Plan (ESAP)
- Land Acquisition Framework (LAF) – this document.

The Developer commissioned the E&S Team to prepare an ESIA for the Project to identify and assess any potentially significant future adverse E&S impacts associated with the proposed Project, assess compliance with applicable national laws and the IFIs requirements to determine the measures needed to prevent or minimize and mitigate the adverse impacts, and identify potential E&S opportunities, including those that would improve the E&S sustainability of the Project. The ESIA is being prepared for international financing requirements and in order to obtain a national environmental permit.

The ESIA and this RF also cover associated facilities related to the Project. Associated Facilities are facilities that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable. The Project will rely on several Associated Facilities that are required to support its operation, including gas supply infrastructure, electrical interconnection facilities, and water supply systems. They include:

- A new Overhead Transmission Line (OHTL)
- Short gas and water pipelines to tie into nearby existing gas and water supplies.

1.3 Scope of the Land Acquisition Framework

This document is a Land Acquisition Framework (or Land Acquisition Policy Framework – LAF LAPF) in the sense of international resettlement standards, including IFC's Performance Standard 5 and AIIB's Environmental and Social Standard 2.

The RF establishes all principles applicable to the LAR process. It applies to all Project components and Associated Facilities (with specificities in regards of these latter). It is prepared in conformance with applicable guidance published by the IFC, including Guidance Note 5 and the IFC Land Acquisition and Involuntary Resettlement Handbook (2023).

1.4 Preparation of the RF

This RF is part of the overall ESIA package for the Project and therefore must be read in conjunction with the ESIA. Preparation of this RF involved the following:

- A review of previously prepared Project documentation, including similar documents prepared for similar projects in Jordan;
- A review of Jordanian legislation, including relatively recent changes;
- Site visits and a preliminary survey of the Project footprint, including the route of the gas pipeline and power transmission line, carried out in mid-2026 as part of ESIA and RF investigations.

2. PROJECT DESCRIPTION

2.1 Overview

This Land Acquisition Framework is part of the overall ESIA prepared to assess the E&S impacts associated with the Mafrq 700 MW CCGT Project. The Project includes new power plant facilities to be constructed in the Mafrq Governorate around 55 km northeast of capital city Amman. Associated Facilities include a new substation and OHTL and short pipelines to tie-in to nearby existing gas and water supplies.

2.2 Need for the Project and Institutional Set-Up

Jordan's energy sector is considered vital within the Hashemite Kingdom of Jordan, supporting economic growth and sustainable development. However, the sector continues to face key structural challenges, including limited local energy resources and a high reliance on imported energy, including that for electricity generation. Acknowledging this, Jordan adopted a policy direction focused on energy transition through diversifying sources, developing conventional and renewable energy resources, improving energy efficiency, and encouraging private sector investment in energy infrastructure.

In the context of energy transition efforts, the Government of Jordan (GoJ) has announced a comprehensive portfolio of investments that includes more than 200 MW of renewable energy projects till 2029 and approximately 1,400 MW of new CCGT capacity till 2030.

These investments are incorporated within the "Jordan Economic Modernization Vision" as a key pillar for achieving sustainability development goals, and reducing emissions targets, while meeting the accelerated demand growth and ensuring the electricity system's reliability and resilience standards. Also, these projects are part of NEPCO "Master Plan 2024–2035" and MEMR "Jordan Energy Strategy".

The Mafrq CCGT is an integral part of this strategy. CCGT projects serve as a unit of an integrated system of generation and storage plants to maintain a secure and reliable electricity system while accommodating a rapidly increasing share of variable renewable generation.

The Government has approved the development of a CCGT Power Plant Project in Mafrq District within the framework of the Seventh Independent Power Producer Project (IPP7) under a Build, Own and Operate (BOO) arrangement for a term of 25 years.

Etihad Development Company (EDC), the development arm of Etihad Water and Electricity (EWE), submitted a proposal, which was approved on 5 November 2025 by the Council of Ministers. Further details on the institutional and legal framework for the Project are presented in 'Chapter 5' of the ESIA document.

2.3 Administrative Location

Administratively, Jordan is divided into twelve (12) Governorates (Muhafazat). Governorates are further divided into Districts (Liwa'a'), which may in turn be subdivided into Sub-Districts (Qadaa'). The Project is located within Mafrq Governorate, around 55 km northeast of capital city of Amman. It is the second largest governorate in terms of area after Ma'an Governorate. The governorate is located in the northeast of Jordan, bordered by Iraq to the East, Syria to the North, and Saudi Arabia to the South and East.

Within the Mafrq Governorate, the Project is located within the Northwestern Badia District (see figure below), specifically within Hosha Sub-District (Qadaa' Hosha). Hosha Sub-District comprises two municipalities: Al-Basiliyah Municipality and Hosha Municipality, both of which encompass several local communities. Al-Basiliyah Municipality includes the community of Al-Khanasri, where the Project site is located.

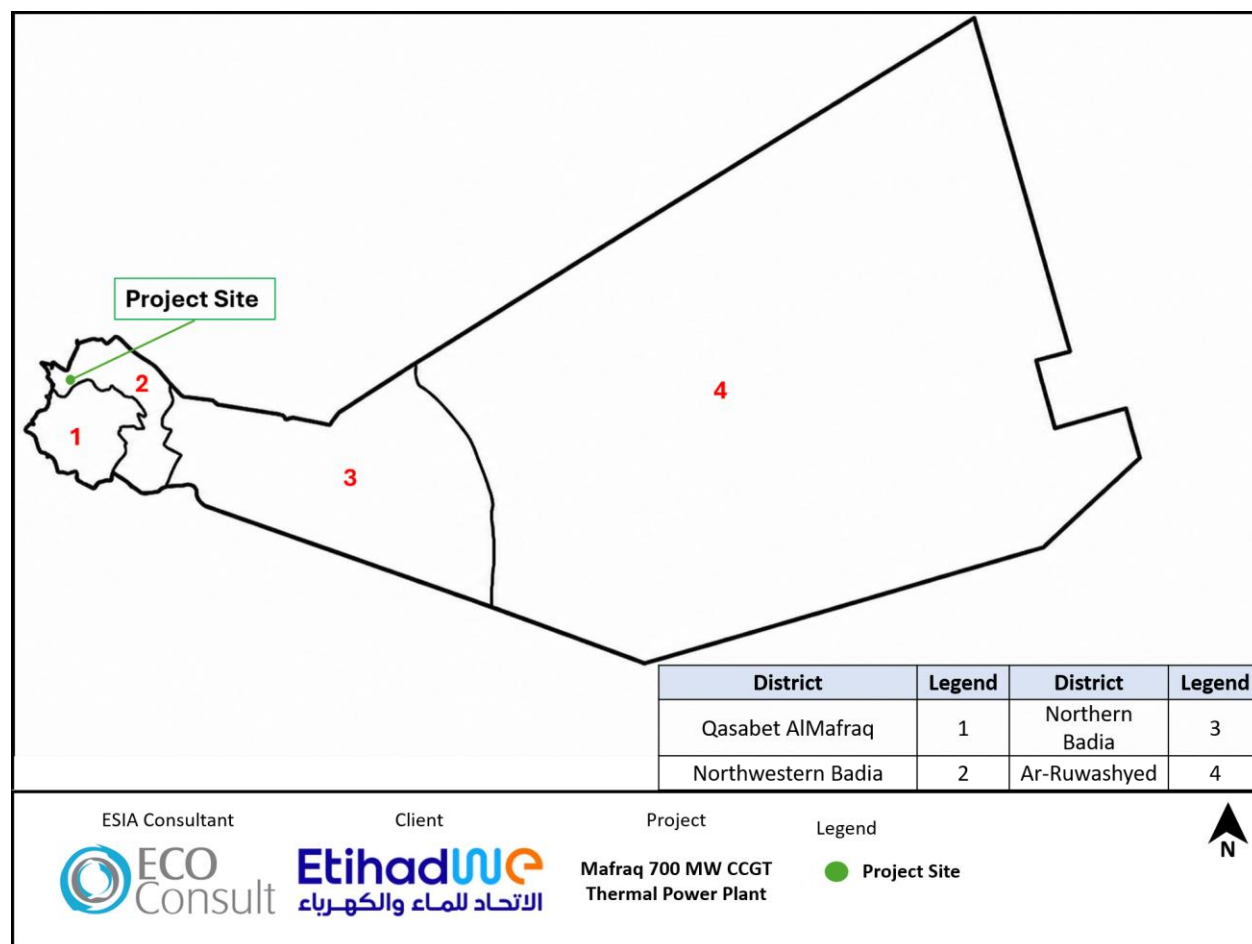


Figure 2: Project Location within Mafrq Governorate

2.4 Administrative Location

The Project sites include the plant site, the substation area, and the temporary laydown area. The figures below show these three (3) components.

The Project will rely on several Associated Facilities¹ that are required to support its operation, including fuel supply infrastructure, electrical interconnection facilities, and water supply systems. These Associated Facilities include:

- Overhead Transmission Line meant to evacuate power to a sub-station (the North Sub-Station);
- Short gas pipeline connection from the nearby compressor station;

¹ Associated Facilities are facilities that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.

- Similarly short water pipeline connection.

The North Substation to which the transmission line will connect is not an Associated Facility as it will serve other purposes. This substation will be built by NEPCO within the context of an EBRD-financed project and as of mid-2026, preparatory work is on-going.

The figures below show the Project and its Associated Facilities (Figure 3) and the Project site (Figure 4). Further details are provided in 'Chapter 5' of the ESIA.

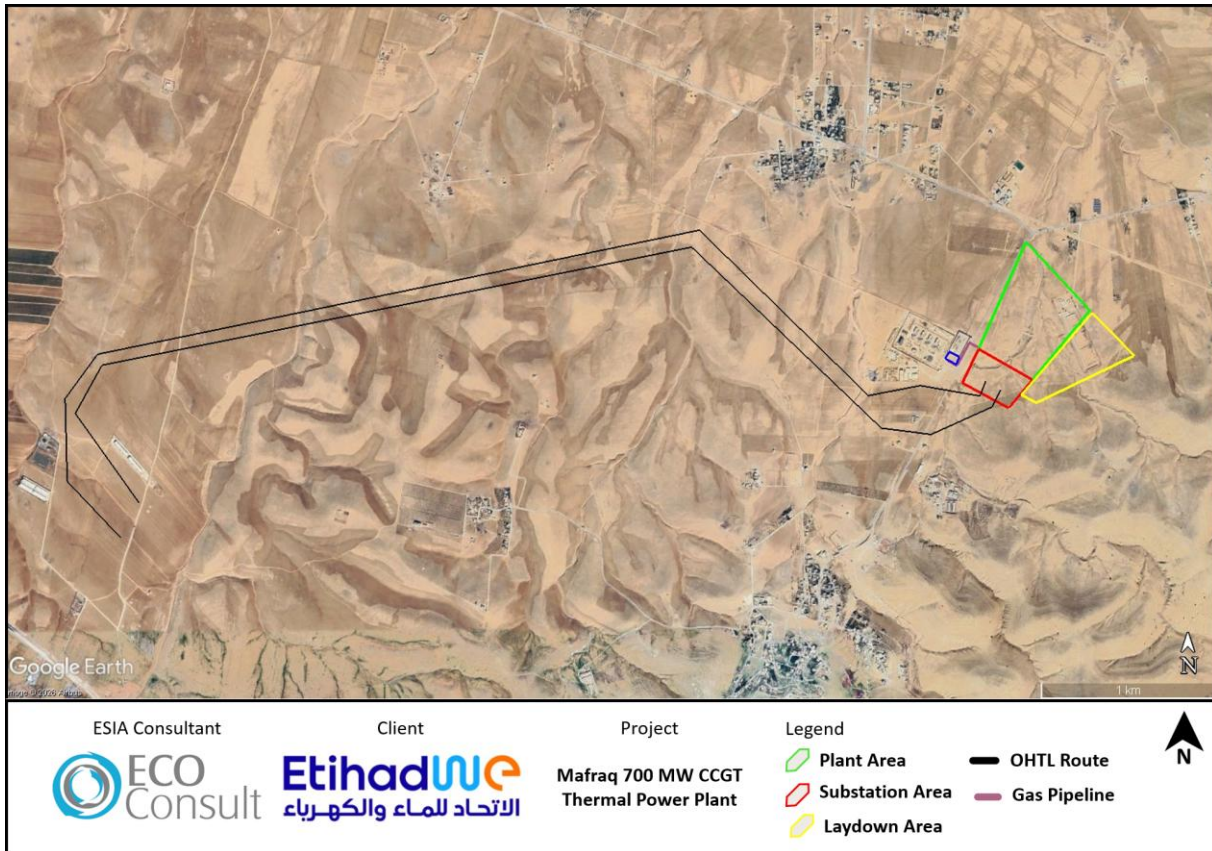


Figure 3: Project and Associated Facilities

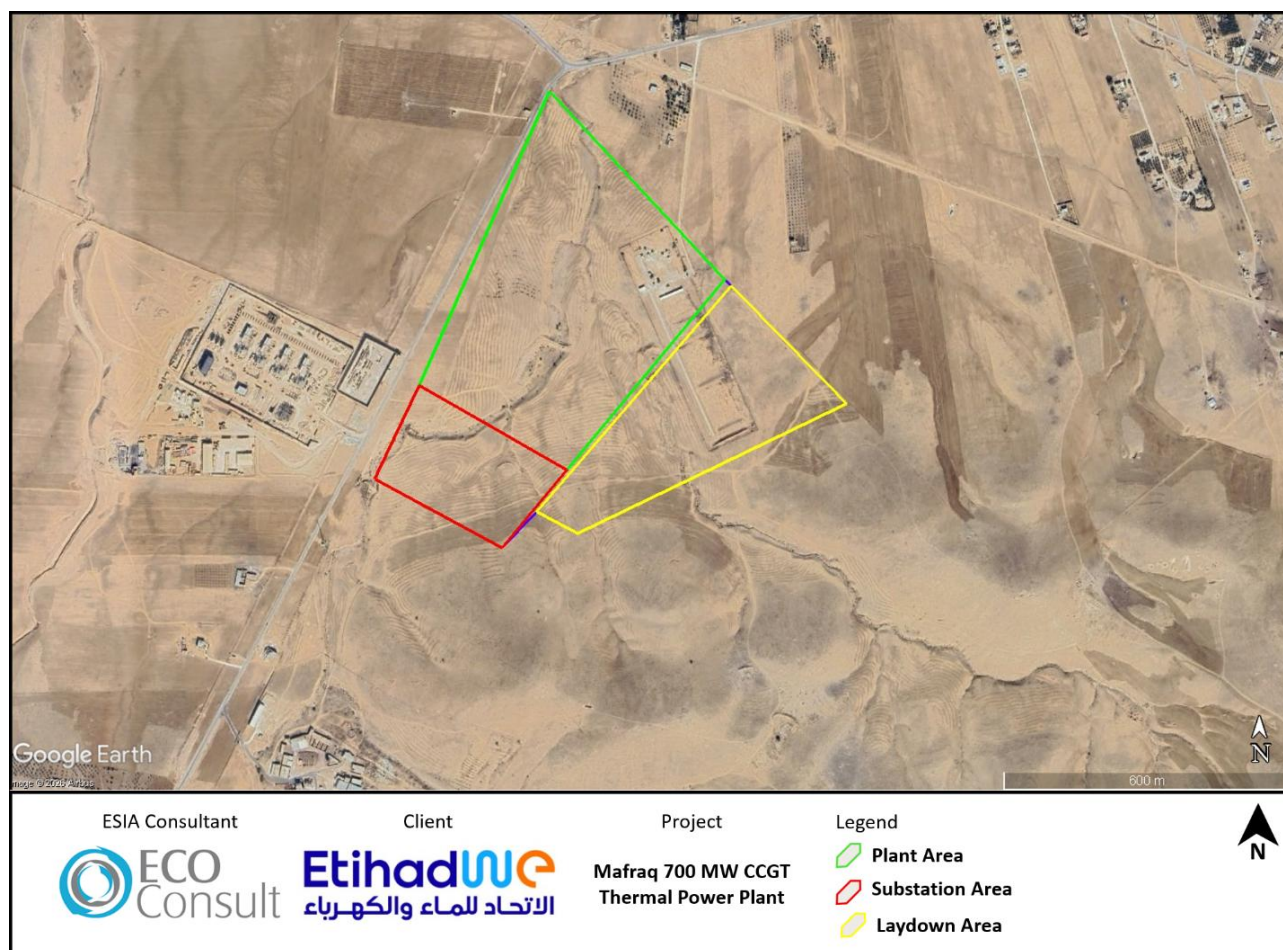


Figure 4: Project Site

2.5 Associated Facilities

2.5.1 Overhead Transmission Line (OHTL) and Substation

Jordanian public power utility NEPCO will be responsible for the off-site electrical interconnection required to connect the Project to the national grid, including the transmission line and the end sub-station. The Project will be connected directly to the North Substation to be constructed and operated by NEPCO, which will serve as the power evacuation point. As mentioned earlier, this substation is meant to serve other purposes and is not, therefore, an Associated Facility. However, the transmission line between the Project and this substation is an Associated Facility since it serves no other purpose and it is necessary for evacuating power from the Project.

NEPCO is responsible for the design, funding, construction, operation, and maintenance of the transmission line, including in regards of E&S aspects. The transmission line is not part of any internationally funded project, in contrast with the North Substation, which is funded as part of an EBRD loan.

There will be a total of 208 towers, each a three-phase steel beam tower. Further details are provided in 'Chapter 5' of the ESIA. A temporary construction corridor of approximately 90 m in width will be used

during construction activities, including tower foundation works, erection, and stringing operations. The permanent Right-of-Way (ROW) for the OHTL is approximately 30 m in width.

2.5.2 Gas Pipeline Tie-in

Natural gas, which will serve as the primary fuel for the Project, will be supplied by NEPCO through a dedicated approximately 300m pipeline connection to the existing natural gas pipeline to the west of the Project boundary as shown in the figure below. NEPCO will provide a spur line from the main gas pipeline and install a gas metering station within a fenced area of around 40 m × 60 m located outside the CCGT power plant boundary and within the Project footprint.

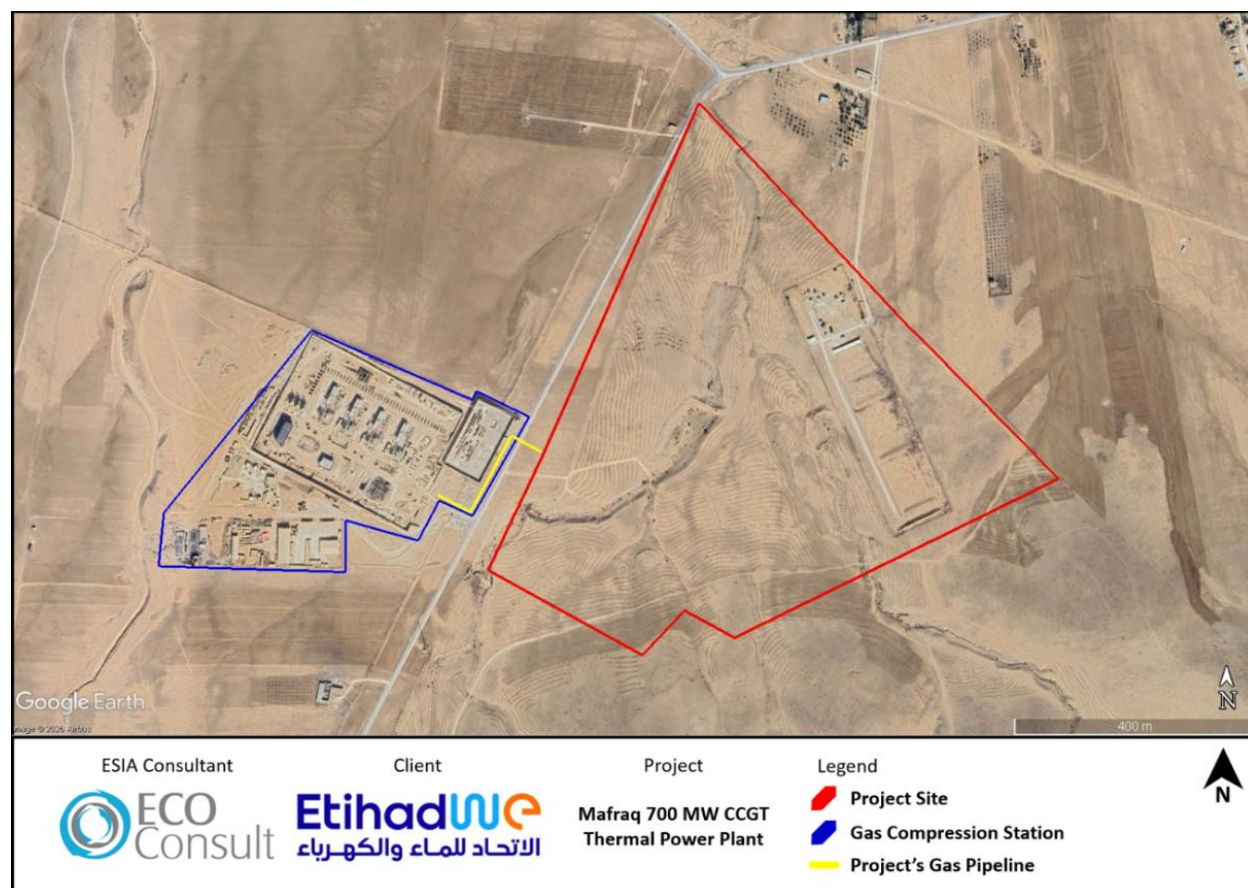


Figure 5: Gas Tie-in

2.5.3 Water Supply Pipeline Tie-in

Raw water of drinking quality will be supplied by the Water Authority of Jordan (WAJ) and Yarmouk Water Company (YWC). The Project will include seven (7) days of on-site raw water storage capacity. At the time of writing, the supply of water is expected to be via a local tie-in to the existing water supply network as shown on the figure below (tentative route obtained unofficially at this point). The pipeline runs from an existing water pumping station in Umm Al Lulu village to the Project site, for a total distance of 4.5km. It appears that the water pipeline follows the existing RoW of a dirt road, thereby minimizing impacts.

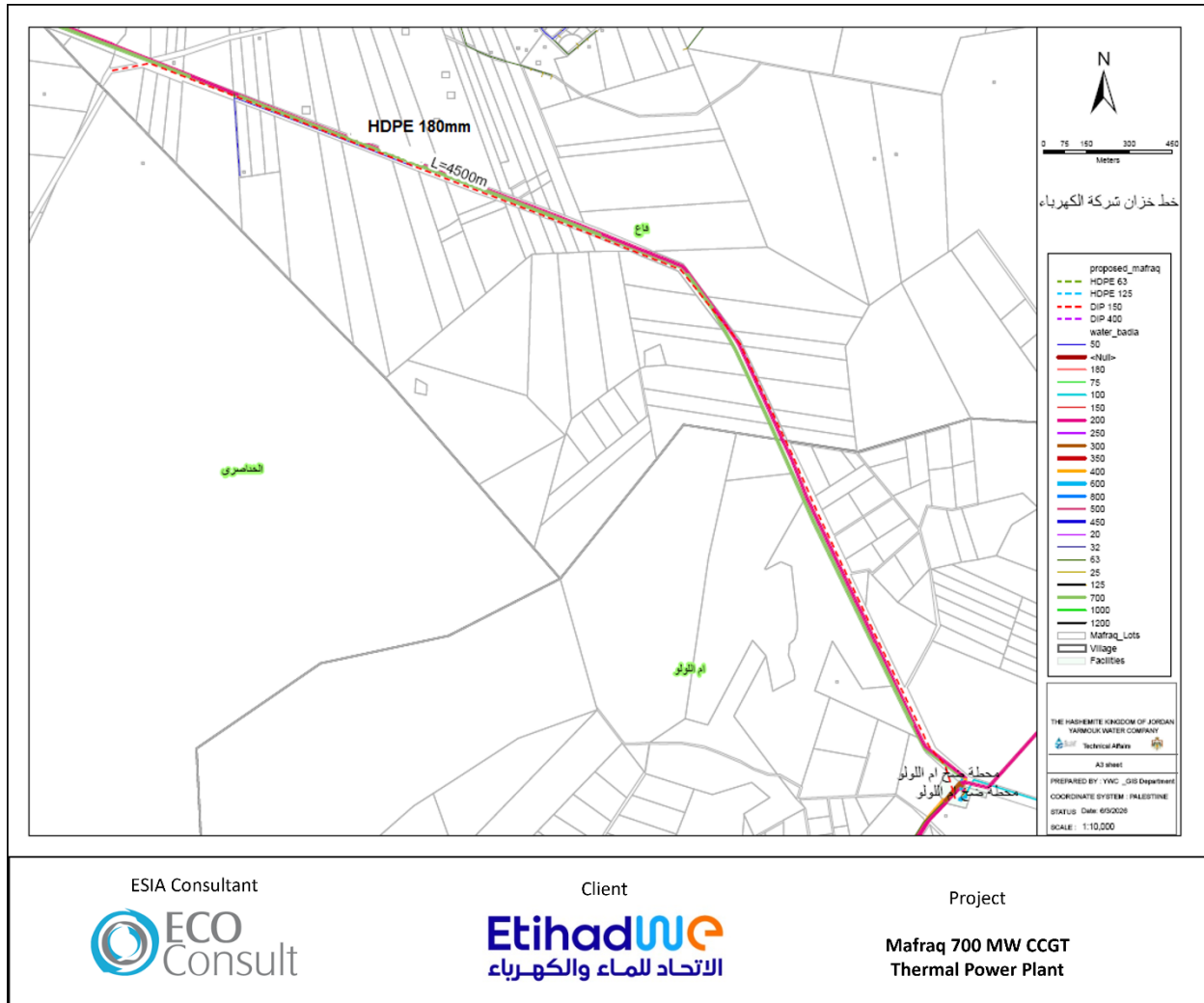


Figure 6: Water Tie-in

3. POTENTIAL PROJECT IMPACTS

3.1 Project Land

3.1.1 Legal Status

The Project site has been selected based on the following criteria:

- No private owners or land users;
- Land designated for industrial purposes;
- In the immediate vicinity to the compressor station where gas supply is available and relatively easy to connect to the proposed North Substation.

The official land deed for the Project plot was collected and reviewed. The plot is officially numbered Plot No. (1), Parcel No. (1) of Khanasri Lands. It has a total area of 3,432 Dunums and 816 m² (3.5km²). The deed indicates that the land is under the ownership of the Treasury of the Government of Jordan with the following allocations:

- An area of 300 Dunums to MEMR for the development of a CCGT Project (9 May 2025);
- An area for a railway project under the Ministry of Transport (13 May 2009).

The type of land as mentioned in the deed is '*Haraj Lands*'. According to the "Agriculture Law No. 13, 2015", *Haraj Lands* are forest Lands of the Treasury of the Government of Jordan that are registered as forests and allocated for forestry purposes. That Law states that it is prohibited to abuse forest lands whether by erecting permanent or temporary residences, buildings or structures thereon, or digging wells or caves, or installing water, electricity or telephone lines, or opening sewage lines or canals therein, or by cultivation or ploughing, or by grazing therein, without a license. However, Article 26(b) specifically states that "lands that can be utilized for the public benefit or allocated for the benefit of the country and which the Prime Ministry decided to allocate it for this purpose" are excluded from these restrictions.

The Prime Ministry's decision number 9/6/1/8651 and issued on 16 April 2025 allocating 300 Dunums (30 hectares or 300,000 m²) from the entire Plot for the development of CCGT Project does refer to Article 26 (b) of the agriculture law (2015) and that based on the Minister of Agriculture's recommendation, the Prime Ministry has decided to allow the MEMR to utilize an area of 300 Dunums to develop a CCGT Project and exempt this from restrictions on Haraj lands.

The Decision also mentions that: (i) the area remains under governmental ownership; (ii) a representative from the MoA is involved in selection of the 300 Dunum areas to be allocated from the entire Plot to the CCGT project; (iii) that the Project starts the development cycle within two (2) years from the date of the Decision; (iv) if Project is not developed within five (5) years from date of the Decision the approval is considered void.

Both the internal Project sub-station and the gas metering station are located within this land plot. Existing structures associated with the military shooting range will be decommissioned by the military and UXO clearance will be provided.

The Prime Ministry Decision is presented in the figure below.

الجمهورية العربية السورية
مديرية التسجيل العقاري
صورة قيد تسجيل الأموال غير المنقولة

المديرية : القريه : الخناصره
نسوح الأري : ملك خارج حدود الممتلكات/حراج

رقسم القيد : 2026-MQ-1380
اسم الحوزة ورقعه : محالة أم اللؤلؤ (1)
اسم الحي ورقعه : (0)

GOV2AGRI 1380-KE (مصلحة) على 1380-KEP6IX

رقسم القطعة : 1
رقسم البناء : 0
رقسم الطابق : 0
رقسم الشقة : 0

رقسم بيان التغيير : 0.000
مجموع الحصص : 1
رقسم النوبة : 1

المساحة : 16.000 متر مربع
3425 متر مربع
المساحة كتامة : كتلة أول أرضيات و الخندق والكون دونم
ولماتمانه و سة شة و هيج و قة لة

GOV2AGRI 1380-KEP6IX

رقسم وطني/مستعمل : 0601000100

رقسم وطني/مستعمل	اسم المالك	الجنسية	الحصص
0601000100	خريسة المعلقة الأردنية الهاشمية	الأردنية	كاملة

2025/05/09 5
كانت حصص الممتلكات المعلقة الأردنية الهاشمية/مستعمل من الدرجة الأولى/المجموع لوزارة الخلق والعلوم المعدنية باستعمال ما مساحته 300 دونم القارة وسط توليد كهرباء، جديدة
2007/04/11 0
استعملت/جزء من هذه القطعة مستعمل لأغراض وزارة الخلق
2009/05/13 2
استعملت/جزء من هذه الأراضي مستعمل لأغراض وزارة النقل (صفة جديد)

ESIA Consultant **ECO Consult**
Client **Etihad** الاتحاد للماء والكهرباء
Project **Mafrq 700 MW CCGT Thermal Power Plant**

الجمهورية العربية السورية
مديرية التسجيل العقاري

الرقم : ٨٦٥١ / ١ / ٦ / ٩
التاريخ : ١٤٤٦ / ١٠ / ١٧
الموافق : ٢٠٢٥ / ٠٤ / ١٦

معالي وزير الزراعة
معالي وزير الطاقة والثروة المعدنية

أشير إلى كتابكم رقم (٤٦٥٧/١٩/٧/٣) تاريخ ٢٠٢٥/٤/٣

استناداً لأحكام الفقرة (ب) من المادة (٢٦) من قانون الزراعة رقم (١٣) لسنة ٢٠١٥، وبناءً على تنسيب معاليكم، قرر مجلس الوزراء في جلسته المنعقدة بتاريخ ٢٠٢٥/٤/١٣ السماح لوزارة الطاقة والثروة المعدنية باستعمال ما مساحته (٣٠٠) دونم من قطعة الأرض الحرجية رقم (١) من الحوض رقم (١) محالة أم اللؤلؤ من أراضي قرية الخناصره/ محافظة المفرق، لإقامة (محطة توليد كهربائية جديدة تعمل بتقنية الدورة المركبة)، واستثناء ذلك من شروط إقامة المشاريع العامة على الأراضي الحرجية من حيث المساحة، شريطة أن تبقى قطعة الأرض أعلاه مسجلة باسم الخزينة حراجاً، وأن يشترك مندوب عن وزارة الزراعة في التحديد، وأن تتم المباشرة في تنفيذ المشروع خلال سنتين من تاريخ صدور هذا القرار، وفي حال عدم اكتمال المشروع خلال خمس سنوات تعتبر الموافقة ملغاة.

واقبلوا فائق الاحترام.

رئيس الوزراء /

٢٠٢٦

نسخة/إلى معالي وزير المالية/ الأراضي والمساحة
نسخة/إلى عطوفة رئيس ديوان المحاسبة
نسخة/إلى عطوفة أمين سر مجلس الوزراء
قرار رقم (٣٣٢١)

ESIA Consultant **ECO Consult**
Client **Etihad** الاتحاد للماء والكهرباء
Project **Mafrq 700 MW CCGT Thermal Power Plant**

Figure 7: Prime Minister's Land Allocation Decision

3.1.2 Land Use

Site visits have confirmed that the Project site is fenced and no land use was observed. Therefore, there is no scope for avoidance and minimization at the Project site.

Before land allocation to the Project per the process described in the section above, Project land was classified as *Haraj lands* (the ‘Khanasri Grazing Reserve’). These lands are managed by the Rangeland Directorate within the Ministry of Agriculture. Overall, there are currently 34 grazing reserves distributed throughout the Kingdom. They are planned and established for sustainable grazing and prevention of overgrazing. As noted earlier, land allocated to the Project represents approximately 10% of the total reserve area. The grazing reserve is owned by the MoA and managed by the Al-Khanasri Animal Research Station under the National Agriculture Research Centre.

An interview with the head of station in charge of the reserve revealed the following:

- Land within the reserve is cultivated on a rotational basis, where the Project area is typically planted as pasture in September and used for grazing until May. The area of the Project site was last planted in the 2019–2020 season. In addition, no grazing activities were observed within the Project site at the time of the visit.
- Grazing activities within the reserve are managed exclusively by the MoA, and external grazers are not permitted to access or use the reserve. The reserve is fenced and is subject to security control and ranger patrols.
- The allocated area for the Project is empty and does not have any structure or assets onsite. *Note: although this was stated, it is known that the military shooting range has structures on site and based on the site visit, transmission towers were also observed on site that are not in use. Consultation with Irbid District Electricity Company (IDECO) (owners of low voltage lines within the north of Jordan) must be undertaken to coordinate for removal of these lines.*
- The overlap with the Project area represents a small portion of the land and does not affect the operations within the reserve.

Consultation was also undertaken with a local herder located outside the Project site and outside the reserve boundaries. He confirmed that local herders use lands outside the reserve for grazing, as they are aware that access to the reserve is not permitted. The Head of the Station noted that occasional encroachment into the reserve by local herders may occur; however, such encroachment is understood to be limited and there was no evidence of this from site observations and the consultations undertaken. It was also checked that no specific structures like water wells or troughs are present on land allocated to the Project.

A formal letter was issued by the ‘E&S Team’ to the Ministry of Agriculture requesting confirmation of the Ministry’s non-objection to allocating the portion of reserve land located within the Project footprint for Project development, and confirmation of whether individuals currently utilizing the reserve land are employees of the MoA and/or the Al-Khanasri Animal Research Station affiliated with the National Agricultural Research Centre (NARC), rather than private herders. The Ministry of Agriculture responded in writing confirming all above points (awaiting formal issuance of this letter).

On this basis, it is confirmed that there are no issues of concern in relation to land allocation for the Project:

- The Ministry of Agriculture was involved in the allocation of the Project specific plot within the grazing reserve and did not object;
- The Head of the Al-Khanasri reserve confirmed that the allocated area is unused and does not have any structure or assets onsite. In addition, she confirmed that the Project area represents a small portion of the land and does not affect the operations within the reserve.
- Several site visits undertaken confirmed that there are no structures or assets within the Project site.
- The Ministry of Agriculture provided a letter confirming their no-objection to the Project as well as confirmation that no individual is affected by the allocation of the reserve land to the Project.

3.2 OHTL Route

3.2.1 Land Use

With regards to the OHTL between the Project and the North Substation, the main considerations taken into account in the Project concept, as provided by NEPCO, include:

- Shortest route possible to the “North” sub-station to minimize cost and losses;
- Compliance with NEPCO's transmission and grid planning and operational requirements;
- Constructability, right-of-way requirements, and land accessibility.
- Other alternatives were discussed with NEPCO. Please refer to ‘Chapter 4’ of the ESIA.

The entire area intersected by the OHTL is private land. Therefore, avoiding land acquisition in that sense is not possible under any option or scenario and impact minimization focused on the avoidance of impacts to structures. The figure below presents the cadastral map and land ownership in the OHTL area which demonstrates that it is all private lands.

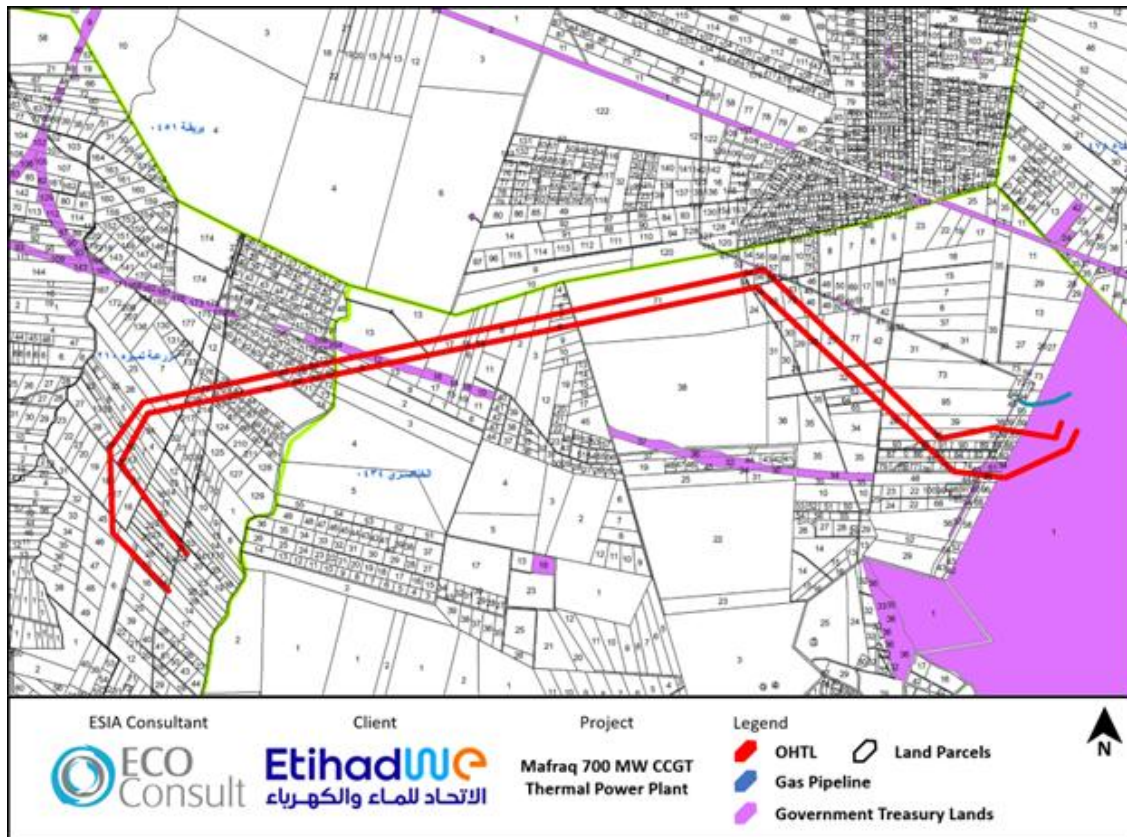


Figure 8: Cadastral Map in the Area Intersected by the OHTL

While avoiding private land was not possible, the focus was put on avoiding structures. NEPCO indicated that a straight-line connection between the Project and the North substation, although approximately 2 km shorter, would have affected a number of structures, as shown on the figure below. The alternative route that was selected has no impact to structures, whether residential or agricultural. For example, at the end of the route towards the North Substation, there is a large poultry farm, which is completely avoided by the selected corridor, although this will entail adding a number of angle towers, thereby increasing the construction cost.

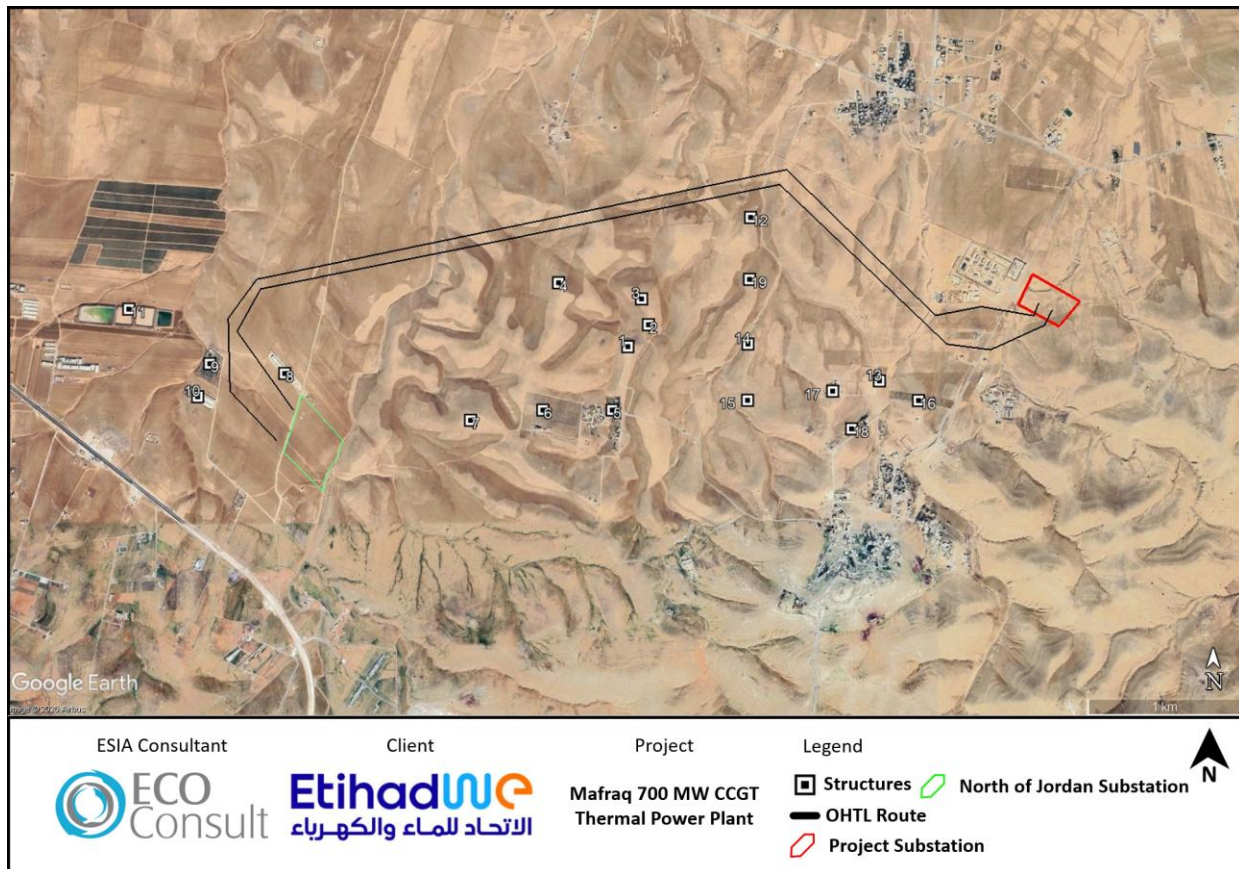


Figure 9: Structures that Could Have Been Affected by a Straight OHTL Corridor

3.2.2 Land Use in Selected OHTL Corridor

A site survey was undertaken for the associated facilities that covered the footprint of these components along with their RoWs. The site visit identified structures as shown in the following photographs and map. Cultivated and wild barley is noticed along many parts of the OHTL route in particular.



Figure 10: Photographs along the OHTL Corridor

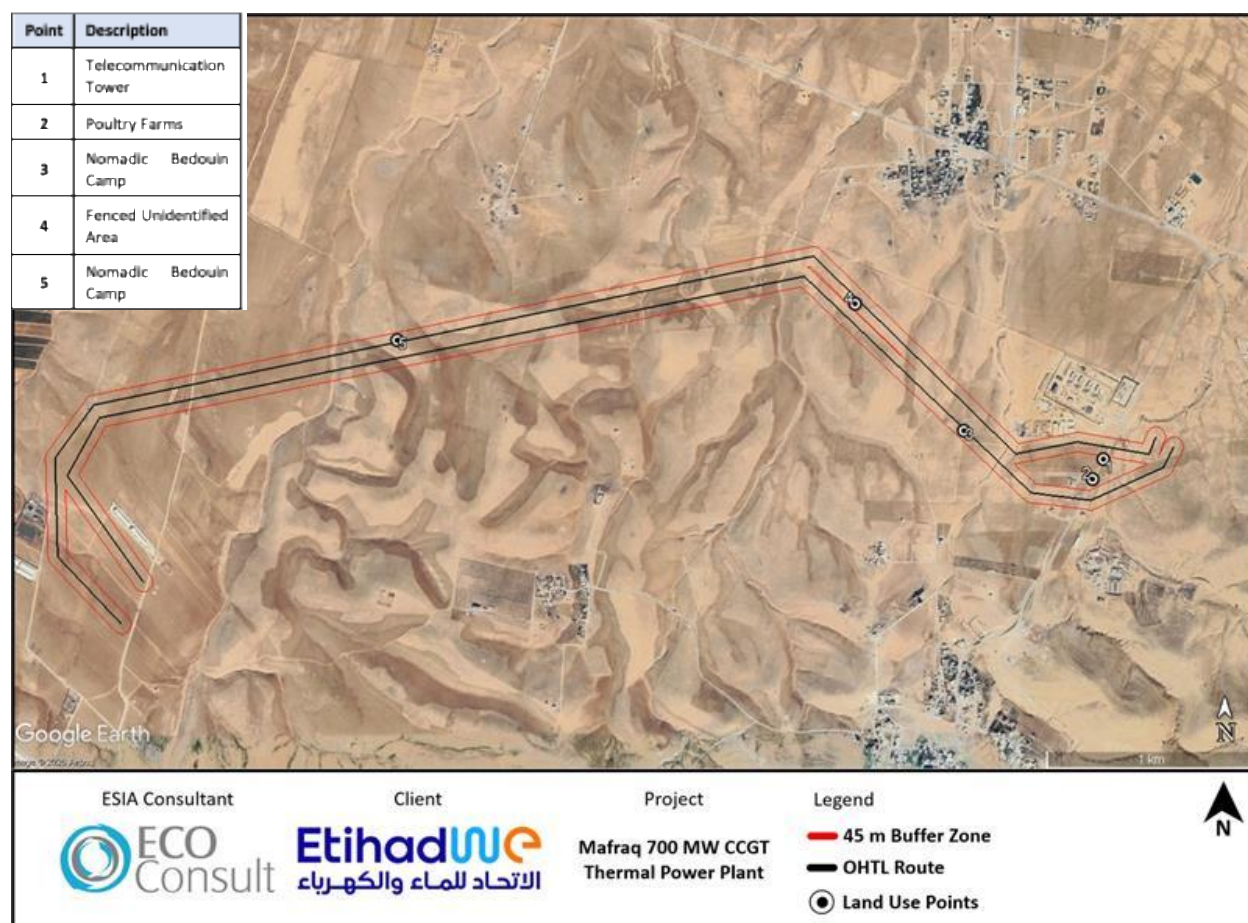


Figure 11: Land Use in Areas Intersected by the OHTL Corridor

3.2.3 Affected Land Plots (OHTL)

The cadastral map is presented above in Figure 7. Information was collected on landownership on an unofficial basis and is presented in the table below. As noted, the entire area is under private ownership. The OHTL runs within 99 private parcels and the gas pipeline affects 3 private land plots. The total affected area is approximately 400,000 square meters (400 dunum or 40 hectares), representing in average 13% of the corresponding total surface area of affected land plots.

Table 1: Affected Land Plots - OHTL

No	Cadastral Number	Cadastral Basin	Total Area Dunum (1000 m ²)	Affected Area Dunum (1000 m ²)	Affected Area (%)
1	15	5	13.042	6.713	51.5%
2	14	5	4.2937	2.506	58.4%
3	6	13	54.176	3.956	7.3%
4	5	13	10.196	0.774	7.6%
5	22	13	4.962	0.775	15.6%
6	21	13	3.996	10.977	274.7%
7	20	13	3.977	0.828	20.8%
8	16	13	20.120	2.390	11.9%
9	17	13	21.440	4.138	19.3%
10	18	13	4.012	4.772	118.9%

No	Cadastral Number	Cadastral Basin	Total Area Dunum (1000 m ²)	Affected Area Dunum (1000 m ²)	Affected Area (%)
11	19	13	22.049	0.618	2.8%
12	23	3	12.404	1.848	14.9%
13	31	3	13.39	4.155	31.0%
14	30	11	13.79	4.377	31.7%
15	29	11	8.261	3.124	37.8%
16	13	11	15.231	1.556	10.2%
17	12	11	10.842	1.469	13.5%
18	10	11	10.643	1.947	18.3%
19	9	11	11.909	1.571	13.2%
20	8	11	13.901	0.790	5.7%
21	7	11	6.992	1.139	16.3%
22	5	11	21.221	4.591	21.6%
23	34	11	6.211	1.473	23.7%
24	35	11	7.227	0.328	4.5%
25	26	11	58.455	5.597	9.6%
26	25	11	58.466	5.773	9.9%
27	7	6	75.110	6.585	8.8%
28	217	6	8.726	0.456	5.2%
29	216	6	8.792	4.143	47.1%
30	214	6	9.407	1.653	17.6%
31	77	6	6.885	2.540	36.9%
32	78	6	4.547	1.717	37.8%
33	79	6	4.447	1.595	35.9%
34	80	6	4.836	1.284	26.6%
35	82	6	4.656	1.774	38.1%
36	83	6	4.019	1.851	46.1%
37	84	6	4.093	0.164	4.0%
38	12	6	125.491	16.851	13.4%
39	67	6	4.400	2.396	54.5%
40	69	6	4.965	2.204	44.4%
41	66	6	4.501	1.018	22.6%
42	68	6	4.058	1.669	41.1%
43	70	6	4.260	2.063	48.4%
44	71	6	4.126	0.329	8.0%
45	72	6	4.490	0.205	4.6%
46	49	6	3.895	2.217	56.9%
47	50	6	3.716	2.024	54.5%
48	51	6	3.665	0.188	5.1%
49	122	6	6.594	1.805	27.4%
50	9	9	22.046	3.534	16.0%
51	12	5	21.086	6.350	30.1%
52	13	5	191.386	21.338	11.1%
53	17	5	65.041	11.71	18.0%
54	16	5	8.686	1.819	20.9%
55	19	5	29.211	3.91	13.4%
56	8	5	49.638	10.449	21.1%
57	2	4	58.108	7.382	12.7%
58	3	4	65.716	5.798	8.8%
59	6	4	4.595	0.362	7.9%
60	7	4	4.600	3.244	70.5%

No	Cadastral Number	Cadastral Basin	Total Area Dunum (1000 m ²)	Affected Area Dunum (1000 m ²)	Affected Area (%)
61	8	4	12.267	4.781	39.0%
62	71	4	378.422	75.566	20.0%
63	24	4	21.477	4.137	19.3%
64	54	3	13.959	2.472	17.7%
65	55	3	0.784	0.517	65.9%
66	56	3	14.478	2.974	20.5%
67	57	3	0.782	0.522	66.8%
68	58	3	14.439	1.725	11.9%
69	79	3	20.955	5.796	27.7%
70	30	3	22.025	1.431	6.5%
71	46	3	21.486	2.084	9.7%
72	29	3	22.152	3.178	14.3%
73	28	3	22.402	3.471	15.5%
74	27	3	39.823	11.873	29.8%
75	77	6	37.886	5.483	14.5%
76	42	6	38.932	0.186	0.5%
77	32	6	68.328	9.173	13.4%
78	63	6	14.246	2.272	15.9%
79	64	6	13.642	2.06	15.1%
80	65	6	14.886	1.162	7.8%
81	73	6	135.126	1.176	0.9%
82	26	6	11.468	3.76	32.8%
83	95	6	116.019	9.974	8.6%
84	39	6	47.173	7.677	16.3%
85	38	6	0.498	0.146	29.3%
86	85	6	43.500	1.650	3.8%
87	92	6	42.770	2.658	6.2%
88	33	6	13.289	1.165	8.8%
89	75	6	6.088	2.195	36.1%
90	74	6	6.203	1.079	17.4%
91	36	6	47.355	11.705	24.7%
92	44	6	0.500	0.122	24.4%
93	45	6	0.565	0.119	21.1%
94	48	6	5.965	2.988	50.1%
95	35	6	463.240	0.302	0.1%
96	36	6	47.355	0.311	0.7%
97	37	6	3.687	0.888	24.1%
98	38	6	0.498	0.446	89.6%
99	39	6	47.173	2.670	5.7%
Total			3,092.84	402.71	13.0%

3.3 Gas Tie-in and Water Pipeline

The gas tie-in is very short and impacts are negligible. The gas-tie in connects to an existing gas compression station that has been operational since the early 2000's. The station is currently undergoing an expansion project by an additional area to the existing station amounting to 50,000 m² (0.05km²). Based on discussions with Fajr (the gas utility company) it was confirmed that the expansion project is not related to the CCGT Project, but rather general expansion activities required for this facility. A land acquisition

process for the additional lands has been completed in 2024 by MEMR. It was also indicated that the private land owners followed the judicial system requesting additional compensation since then, and a final decision is expected to be issued within the next month or so. The tie-in facility required for the CCGT Project will be located within this additional area, and will only require 2,700 m² only.

For the gas pipeline, three (3) private plots will be partially affected during construction and operations (restrictions). These land plots appear not to be used. The following table shows available information with regards to these land plots. Affected areas are estimated:

Table 2: Affected Land Plots – Gas Pipeline

No	Parcel Number	Basin	Total Area-Dunum	Pipeline Length within Parcel (m)	Constructi on Area Acquired - Dunum	Operational Area Acquired-Dunum	Constructio n Area Acquired (%)	Operation al Area Acquired (%)
1	95	6	116.02	174	2.61	0.87	2.25%	0.75%
2	73	6	67.18	40	0.59	0.20	0.89%	0.30%
3	1	1	3420.20	58	0.87	0.29	0.03%	0.01%

The water pipeline follows an existing road. No acquisition of private land or impacts to informal users are envisioned.

3.4 Summary of Impacts

Table 3: Summary of Project and Associated Facilities Impacts to Land and Livelihoods

Impact	Project	Associated Facilities
Physical displacement	None	None
Economic displacement	None (state land with no users, whether formal or informal)	Transmission line: Farmers and herders per details below:
Affected land plots		102 private land plots are affected, of which it is estimated based on satellite imagery that about half are actively used for agriculture in a normal agricultural season (mainly barley, no high value irrigated crops observed, no greenhouses observed). In average, 13% of the surface area of affected land plots will actually be affected by the transmission line corridor.
Affected herders	None	2 Bedouin camps were observed close to the transmission line corridor, with animals grazing on crop residue and wild barley. Their presence is temporary in relation to the presence of crop residue. The water pipeline, gas connection and gas metering facility are not anticipated to entail any land or livelihood impacts.

4. LEGAL FRAMEWORK

4.1 Overview of the Jordanian Legal Framework Pertaining to Expropriation for Public Interest

4.1.1 Overall Framework

Jordan has consolidated all legislation pertaining to land and real estate in the “Real Estate Ownership Law” (REOL) of 2019. Amongst others, this law addresses expropriation for public interest and repealed older (1987) legislation in this respect. Jordanian legislation complies with usual principles of just compensation at market rates and seeking negotiated agreements and is generally in line with key human rights law as enshrined in Article 17 of the Universal Declaration of Human Rights. This is confirmed in Article 11 of the Constitution, which states: Article 178 of the REOL confirms provisions in the Constitution: “No land can be taken away unless it is for public benefit and that there is fair and just compensation for any PAPs”.

4.1.2 Negotiated Expropriation Process

The process established by the REOL (Article 189) is typical of expropriation processes in countries with advanced legislation protecting private property and human rights in general:

- A public utility act must beforehand be taken by the Cabinet of Ministers based on tentative information on affected plots and land ownership provided by the Department of Lands and Surveys through the expropriating agency;
- This act is notified to landowners and right holders through a public notice published in local newspapers;
- The law requires first negotiation between the public agency benefitting from the expropriation process on the one hand, and landowners on the other, until a negotiated agreement is reached (Article 189 of REOL). This is the “administrative amicable process” applicable in most democratic countries: the administration is mandated by law to negotiate with landowners and cannot proceed with any other process unless that negotiated step has been completed.
- Only in case a negotiated agreement cannot be reached is the expropriation case referred to the competent courts of law, thereby triggering a judicial process.

The following figure shows the amicable part of the expropriation process:

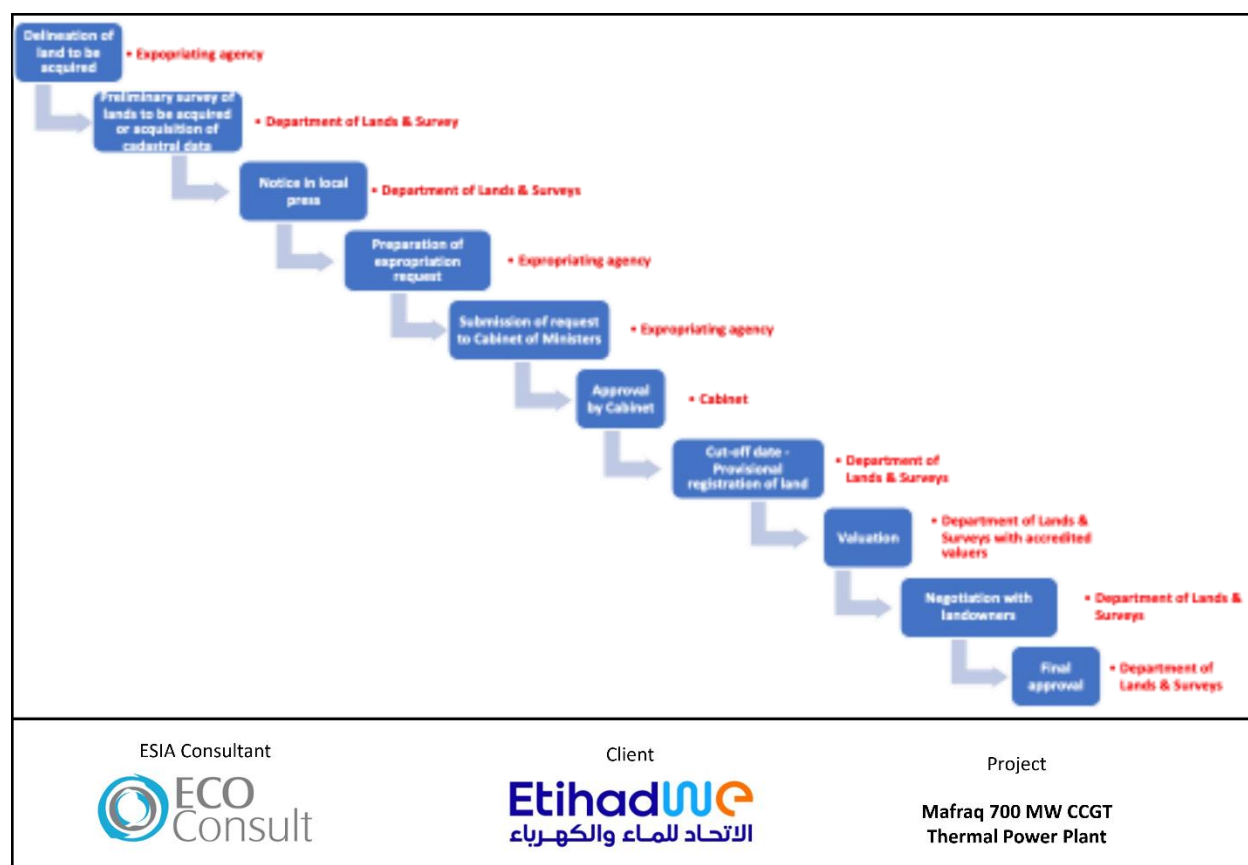


Figure 12: Amicable Expropriation Process (Summary)

When a final agreement is reached on compensation, approval by the Directorate of Land and Surveys (DLS) and eventually by the Cabinet is required. The expropriating agency must pay the compensation to the land owner directly or deposit the full compensation amount in the Treasury under the beneficiary's name within three months after Cabinet approval.

Article 186 of the REOL specifies that the owner of the property (that can be expropriated and receive compensation) is the person in whose name the property is registered in the Land Registry. If the property is not registered, the expropriating agency automatically becomes the owner of the land at the time the above-mentioned Cabinet Decision is issued. Other parties may claim ownership later before a court of law.

Compensation claims of legally established renters or lease holders can be considered.

Acquisition of government lands and assets is handled through intra-agency discussions and agreements that involve the transfer of ownership from one government department to another.

There are no specific provisions in the REOL or other legislation for tribal lands to be acquired or for the loss of traditional use rights. At this point in time, there is no indication that tribal lands may potentially be affected by the Project.

4.1.3 Judicial Process

Experience shows that a majority of landowners elect not to accept the compensation proposal of the expropriation agency and seek judicial expropriation rather. The very principle of expropriation for public interest can be challenged by landowners during the 15-day publication period of the expropriation notice. This is very uncommon. However, legal challenges to the compensation proposal formulated by the expropriating agency per the process outlined in the previous section are very common, for a range of reasons:

- In all regions of Jordan, local lawyers specialize in contacting landowners as soon as an expropriation notice is published with strong suggestions that they will get more if they challenge the compensation proposal (lawyers typically get around 20% of the compensation in fees);
- Although there is no official statistics confirming this, it appears that a majority of landowners perceive that compensation amounts offered by expropriating agencies are below market value and therefore follow lawyer's suggestions to challenge the amount before court.

This is a significant impediment to the implementation of public infrastructure projects in Jordan as judicial processes can take up to two years, particularly if there is an appeal to the first instance judgement (there are potentially two levels of appeal up to cassation in the last instance).

When reviewing a compensation claim upon a landowner's legal challenge, the judge will commission an independent expert valuation, while the landowner may submit their own valuation too. Amounts resulting from legal challenges before court are typically higher than those proposed by the expropriating agency, with sometimes significant differences (50% higher is not uncommon, with up to three or four times the initial amounts in some exceptional cases). This creates a high incentive for landowners to challenge the initial offer at court.

4.1.4 Valuation

In Jordan, the valuation of land and other immovable assets is regulated primarily under the REOL, the Land Registration Fees Law (and amendments, e.g., No. 26 of 1958), Regulation No. 4 of 2019 on Committees for Estimating the Values of Immovable Properties, and especially Regulation No. 37 of 2020 on Estimating Property Values and Registering Real Estate Valuers.

The Department of Lands and Survey (DLS) is the main authority. It oversees both individual valuations (by licensed valuers or committees) and so-called "mass"/administrative valuations.

A. *Prescribed Valuation Approaches*

Article 4(a) of Regulation No. 37 of 2020 explicitly requires the use of one of the three following standard approaches to reach the "true/real value" of properties, with details governed by instructions issued for this purpose:

1. The Comparison (Sales Comparison / Market) Approach is the primary and most commonly used method. Value is derived by comparing the subject property to recent sales of similar properties in the same market/area (same basin, neighborhood, etc.), with adjustments for differences in location, size, features, condition, zoning/organization, and other factors. Local estimation committees base administrative values largely on average sale rates.

2. The Income Approach is used especially for income-producing properties. Value is estimated by capitalizing expected net income (or potential income). For agricultural land, annual income is estimated based on what the land would produce if cultivated properly according to local average practices. An interest/capitalization rate is applied based on up-to-date macro-economic data.
3. Cost Approach: Replacement/reproduction cost of improvements (buildings, etc.) less depreciation, plus land value. Depreciation for residential properties has been referenced in DLS-related materials at approximately 2% per year. Formula examples from DLS communications include adjustments for positive/negative factors, depreciation, and land value.

Valuers must consider relevant data sources (registration documents, maps, sale records, engineering estimates from the Engineers Association, rental data, etc.) and property characteristics. Detailed application is set out in instructions issued under the regulations.

In practice, the comparison approach predominates for most market and administrative purposes, supplemented by the other two methods as appropriate. This is in line with international guidance, which also favours the comparison approach. Values aim to reflect market reality while providing transparency and some level of standardization.

B. Administrative (Mass) Valuation System

DLS has implemented a nationwide administrative value system covering roughly 1.7 million land parcels. Values are set per geographic location (governorate, district, cadastral basin, and other factors) and are intended to approximate market value. They are reviewed/updated at least every three years based on market movements. This is typically not used in specific infrastructure projects, for which individual valuations are always commissioned, but is used for taxation purposes and can be used as a benchmark amongst others for individual asset valuation.

- Local estimation committees in each registration directorate (including DLS specialists, licensed valuers, representatives from the Real Estate Offices Syndicate and Jordanian Valuers Association, and regulatory bodies) prepare estimates based on sale averages and principles by majority vote.
- Decisions go to a central committee for approval.
- Values are published (website, newspapers, Official Gazette) with a period for objections (typically 30 days initially; ongoing reconsideration possible).
- Once finalized, administrative values are binding for calculating registration fees, certain taxes, and related official purposes, reducing ad-hoc human intervention and allowing pre-calculation of fees online.

C. Court valuation processes

In Jordanian courts, valuation of land and other immovable assets occurs in the context of assessing “fair compensation” in expropriation/compulsory acquisition cases.

Article 83 of the Civil Procedure Code empowers the court, at any stage, to order inspection and/or appoint one or more experts on any movable or immovable property (or other matter) when necessary. The court must state the reasons, purpose, and precise task. Experts are drawn from the official roster regulated by the Expertise System before the Regular Courts (System No. 35 of 2018, as amended by No. 22 of 2020). Categories include real-estate valuers, land surveyors, building experts, and specialists in expropriation compensation or diminution in value.

Key features of the process are the following:

- The court (or parties by agreement) selects experts. Parties may agree on non-roster experts; silence can imply consent.
- Experts inspect the property (often with judicial accompaniment or under court direction), review documents (title deeds, cadastral maps, zoning plans, sale records from the Department of Lands and Survey), and prepare a written report.
- The report must describe the property comprehensively, apply relevant valuation principles, and reach a reasoned conclusion. Supporting documents are attached as needed.
- The court notifies the parties, who may comment or object. The court may accept the report, reject it (with reasons), return it for completion, or order a new expertise (sometimes with a larger panel if reports differ substantially).
- The expert's opinion does not bind the court (Article 86). It is persuasive evidence subject to the judge's discretion; the court may adopt all, part, or none of it, provided the decision is reasoned.

In practice, court-appointed valuers apply the same three approaches recognized under DLS regulations (comparison/sales comparison, income/capitalization, and cost/replacement less depreciation, see above), adapted to the specific task and date of valuation. Comparable sales from the land registry, location, size, zoning, soil quality, access, improvements, and market conditions are always prioritised. For agricultural land, productive capacity and proper cultivation practices are considered. Depreciation rates and capitalization factors are consistent with local macro-economic indicators (around 2% annual depreciation for residential buildings and capitalization rates of about 7%).

If the parties cannot agree, either may apply to the court to fix the amount. Multiple expert reports are common when disparities exist; the Court of Cassation has addressed “vast differences” between reports and the need for new expertise that properly accounts for the land's nature and productive use.

Courts emphasize that valuation must be objective, reasoned, and grounded in evidence rather than speculative. Reports that ignore comparable sales, zoning, or the specific characteristics of the land are vulnerable to challenge. Licensed real-estate valuers are preferred for property-value tasks. The Court of Cassation frequently reviews whether lower courts properly supervised the expertise, addressed objections, and gave adequate reasons when accepting or rejecting reports.

4.1.5 Compensation

Article 190 of REOL states that compensation should be fair to both parties. Owners should be compensated for their properties including (e.g., buildings, improvements, trees) at full replacement cost at market

Compensation is based on the surface area of land expropriated; the purpose of expropriation; the percentage of land expropriated within the overall land plot, and the status and size of the remainder.

In some cases, parts of land plots smaller than 25% of the total parcel area can be expropriated without compensation (for linear projects or government housing projects). However, article 193 of the REOL also allows full expropriation of a land plot that would be partially affected if the remainder can be used any longer for its purpose.

Compensation for agricultural land may include separately itemized compensations for developments such as walls, greenhouses, canals, wells, water rights, etc. Also, article 190 of REOL states that owners should be compensated for buildings, improvements, trees and, etc. at full replacement cost. No specific guidelines are provided in regards of crops and trees except that compensation should be equitable. Additionally, damages caused by the Project may be compensated. Jurisprudence has also established that loss of water rights could require compensation.

The REOL provides that compensation to formally registered lease holders or renters can be calculated as a percentage of the compensation for the plot, which cannot be higher than 15% for industrial or commercial properties and not higher than 8% for other land uses.

4.1.6 Typical Value Benchmarks in the Area

Experience of other projects close to the IPP7 site suggests the following:

- When an expropriation notice is published, local lawyers tend to get in touch with affected landowners and suggest a legal challenge before court rather than accepting initial amicable transactions proposed by DLS; in practice, most, if not all affected landowners challenge before Court the compensation amount offered by DLS;
- While initial amicable transaction values offered by the DLS are reasonable (JOD 5,000 per dunum, that is JOD 5 (EUR 6) per m²), the court process results in significantly increased values (up to JOD 20,000 per dunum or EUR 24.4 per m²);
- These values are assessed as higher than replacement cost for non-irrigated land, which for similar land is in the range of JOD 4,000 to 12,000 per dunum, depending on location, access and soil potential;
- For olive plantations, the value is higher and depends on the variety and potential of the plantation, potentially reaching JOD 30,000 per dunum.
- The same applies to irrigated land, which can reach this same value of about JOD 30,000 per dunum.

The conclusion is that while values offered by DLS may not always meet the replacement cost criterion, those resulting from Court processes are generous and adequate.

4.2 Specifics of Electricity Projects

4.2.1 General Electricity Law, 2002

The main legal instrument applicable to the OHTL is the General Electricity Law 64 of 2002. Although it was repealed and replaced by new legislation in 2025, much of its spirit and substance remains applicable.

NEPCO, in accordance with that law, does not undertake land acquisition for the Right of Way of overhead transmission lines and compensates the landowners for only potential losses and land use limitations that may arise due to the OHTL passing through their land. The land remains in ownership of landowners.

NEPCO must compensate the landowner for the loss of value only and does not “expropriate” any area of the land, including the area directly occupied by the pylon and tower footings. Compensation

encompasses the entirety of the land occupied by the pylon, the area beneath the line (with an escalating compensation rate corresponding to the voltage increase), and the buffer area surrounding the overhead lines.

NEPCO's practice has been to pay compensation only once the line is energized.

Table 4: Key Provisions of the General Electricity Law (Law 64 of 2002) in Relation to Land Acquisition

Key Provisions
Article 43: The Developer or authorized entity is allowed to generate, transport and distribute electricity, by implementing the following activities: The extension or establishing lines or supplies or electrical installations under any road or street or through or over any of them, if necessary, except for archaeological sites, and install supplies or any electrical devices on the stairway or corridor or the field or through or over any of them or any other estate to supply electric power consumers. Prior to implementing activities of electricity generation, transport or distribution, the developer must publish a notice in two (2) daily local newspapers, at a minimum of 15 days before the intended start date of the works. The developer is obliged to provide compensation to Property Owners based on the activities outlined in the provisions on this article.
Article 44: The developer must pay compensation to the affected persons caused by the license to work. This includes for land permanently affected by the tower foundations. In the case there has been no agreement during negotiation between the developer and the private owner, on the compensated amounts, then the developer is obliged to pay the amount decided upon by the legal courts In the case when only the OHTL passes over the estate, the affected individual is compensated based on the percentage of land affected by the ROW of the lines, once the lines are energized. Safety setback and buffer considerations are taken into consideration when determining the percentage of the lands. The affected person shall be compensated in accordance with the provisions of this law for the decrease in the value of the 'damaged' area of land under, though, or over which electrical lines pass from the date of the establishment of those facilities, considering the instructions for 'Sanitary rules to ensure electrical safe distances from OHTL' No. 1 for 2003 issued by the EMRC2 when calculating the area of the damaged part of the land. An annual legal interest rate is added to the declared compensation value. No compensation claims from property owners will be accepted or processed after three (3) years from energizing the project. No compensation claims are accepted or processed by individuals who acquire the land after the establishment and/or energizing of the project
Article 45: The developer has the right to acquire lands and the rights needed to implement his activities and projects, based on an agreement with the landowners. In the case no agreement was reached, and the Minister declared that these lands are to be used for such projects, then the lands will be acquired based on the Land Acquisition Law (currently the Real Property Law No. 13/2019).

4.2.2 General Electricity Law, 2025

A new Electricity Law was adopted in early 2025 (General Electricity Law of Jordan, 2025-10) to modernise the legislation in view of the development of renewable sources and increased involvement of the private sector in energy generation.

The core framework has been carried over from the 2002 law, with updates in wording or context. Key similarities between the new and the old law include the following:

- Right to install facilities: Licensed entities (e.g., transmission companies like NEPCO or others) may install transmission lines over, under, or through private land (excluding archaeological sites), subject to prior public notice (at least 15 days via newspapers).
- Compensation trigger: Fair compensation must be paid for damages to movable or immovable property. For lines passing over/through land, this is specifically for the devaluation (decrease in value) of the affected portion of the land.
- Calculation basis:
 - Assessed and paid as of the date the facilities are “established”;
 - Takes into account electrical safety clearances/setbacks (buffer zones) determined by the regulatory authority (EMRC).
- An annual legal interest (rate set by the Cabinet of Ministers) accrues on the compensation from the installation date (or later land acquisition date) until payment.
- Process: Parties negotiate first. If no agreement is reached, the court determines the amount (arbitration possible if agreed). Full expropriation (entailing outright land acquisition rather than the establishment of a Right-of-Way) is possible in some cases under general land laws (the Real Estate Ownership Law No. 13 of 2019) if needed for towers/foundations. The REOL also applies to sub-stations or other similar electricity-related facilities.
- Claims are eligible for review for 3 years from installation of the line. However, claims from subsequent purchasers who buy land after the installations exist are not eligible for review.

The compensation provisions for landowners affected by transmission lines (and other electrical installations) are substantially similar between the 2002 law and the new 2025 one (Article 22, see Annex 1). Both laws prioritize granting utilities a right-of-way (easement) for overhead/underground lines and towers without full expropriation in most cases, with compensation focused on the decrease in land value rather than outright purchase.

Evolutions between the two laws include:

- Broader licensee scope: Explicitly covers more activities (independent transmission, storage, etc.) and licensed private entities, not just traditional public utilities. Compensation obligations apply to any “licensee” performing the works.
- More clarity on Right-of-Ways: Stronger integration with safety buffers and regulatory instructions from the Energy and Minerals Regulatory Commission (EMRC).
- No major shift in amount or method: Compensation and processes are still easement-based (no ownership transfer for most overhead lines), one-time compensation for devaluation + interest.

In practice, under both laws, compensation is often a percentage of the affected land value based on the tower footprint, safety corridors, and reduced usability (e.g., restrictions on building or certain crops under lines). Courts rely on expert valuations.

4.3 Electricity Law and Specific Gaps Pertaining to the Transmission Line

For Overhead Transmission Lines (OHTL), the Jordanian State public utility company NEPCO applies the General Electricity Law No. 10 of 2025. Compensation procedures are established for the Right of Way (RoW) of the OHTL. However, land acquisition (transfer of land ownership to NEPCO) is not warranted under Jordanian law, even in the tower footprint.

Key provisions of the General Electricity Law can somehow deviate from general land acquisition legislation as detailed above and are summarized as follows:

- NEPCO or other authorized entities are allowed to generate, transport and distribute electricity, by establishing or extending lines, generation facilities or other electrical installations under any road or street or through or over any of them, if necessary, except for archaeological sites, and install such electrical facilities in corridors or through fields or through any other estate to supply electric power to consumers;
- Prior to implementing activities of electricity generation, transport or distribution, the developer must publish a notice in two (2) daily local newspapers, at a minimum of 15 days before the intended start date of the works.
- The developer is obliged to provide compensation to property owners. This includes land permanently affected by the tower foundations.
- If there is no agreement on compensation amounts during negotiations between the developer and the private owner, lands are acquired based on the Land Acquisition Law (Real Estate Ownership Law – REOL - No. 13 of 2019), and eventually after the process established under REOL has been implemented, the developer is obliged to pay the amount decided upon by the legal courts.
- In the case when only the OHTL passes over the estate, the affected individual is compensated based on the percentage of land affected by the ROW of the lines. Compensation is paid after the lines are energized. Safety setback and buffer considerations are taken into consideration when determining the percentage of the lands. The affected person is compensated for the decrease in the value of the affected area of land under, through, or over which electrical lines pass. An annual legal interest rate is added to the declared compensation value.
- No compensation claims from property owners are accepted or processed after three years from energizing the project.
- No compensation claims are accepted from individuals who acquire the land after the establishment and/or energizing of the project.

Annexes 1 and 2 present relevant provisions of the Electricity Law.

4.4 Gap Analysis

The following table describes potential gaps in Jordanian law against key requirements of international resettlement standards such as those applied by Lenders IFC and AIIB that are potentially involved in the Project.

The table is structured to show measures applicable to the Project, for which no land acquisition is anticipated and for associated facilities, for which land acquisition is required.

Table 5: Gap Analysis – Jordanian Legislation Against IFC and AIIB Resettlement Standards

Key lender requirement	Assessment of Jordanian law against key lenders requirements	Project measure to bridge potential gaps	Associated Facilities measure to bridge potential gaps
Avoidance and minimisation	International resettlement standards require projects to seek avoidance and minimization of displacement impacts through design optimisation. There are no such requirements in Jordanian law. Significant gap against lenders requirements.	The Project itself has no land acquisition impacts. The site has been selected because it was available Government land.	Avoidance and minimisation have been considered in the preliminary routing of the transmission line as mentioned in section 3.2.1
Stakeholder engagement, consultation and disclosure	International resettlement standards require extensive and inclusive stakeholder engagement throughout the LAR planning and implementation process. There are no such requirements in Jordanian law, which only requires disclosure of the intent to expropriate and a phase of individual amicable negotiations. Significant gap against lenders requirements.	The Project is developing a Stakeholder Engagement Plan as part of the overall ESIA package to address overall stakeholder consultation and disclosure throughout the Project cycle. In addition, this Land Acquisition Framework and any further Land Acquisition Action Plan that might be required will describe specific stakeholder engagement activities specifically associated to the LAR planning and implementation process.	In relation to Associated Facilities under NEPCO's responsibility, NEPCO is in the process of implementing an ESAP and corporate-level ESMS under an EBRD loan. NEPCO is expected to develop a corporate-level Stakeholder Engagement Framework in conformance with EBRD stakeholder engagement requirements, which are similar to those of IFC and AIIB.
Grievance management	There is no specific requirement prescribed in Jordanian law with respect to the establishment by projects of a dedicated, extra-judicial grievance mechanism. Aggrieved parties have to address their claims to courts of law to seek redress. Significant gap against lenders requirements.	A grievance mechanism including a recourse mechanism is being established by the Project as part of the Stakeholder Engagement Plan mentioned above. Associated specifications are presented in the Stakeholder Engagement Plan and this Land Acquisition Framework and further Land Acquisition Action Plan.	In relation to Associated Facilities under NEPCO's responsibility, NEPCO is in the process of implementing an ESAP and corporate-level ESMS under an EBRD loan. NEPCO is expected to develop a corporate-level Grievance Redress Mechanism in conformance with EBRD stakeholder engagement requirements, which are similar to those of IFC and AIIB.
Negotiated settlements	Jordanian law requires expropriating agencies to seek negotiated settlements in the first phase of the expropriation process. No gap against lender requirements.	Not anticipated to be applicable. Compensation will be negotiated if applicable.	Compensation will be negotiated par applicable provisions of Jordanian law.
Compensation at replacement cost	Jordanian compensation prescriptions require an independent valuer to prepare a valuation at market value. Transaction cost is not specifically taken into consideration; however, experience shows that compensation values for land and structures are generally adequate and do cover	No specific provision is required.	No specific provision is required.

Key lender requirement	Assessment of Jordanian law against key lenders requirements	Project measure to bridge potential gaps	Associated Facilities measure to bridge potential gaps
	transaction cost. Where affected people challenge the compensation amount at court, judges often rule in favor of increased compensation amounts. Moderate gap against lender requirements.		
Cut-off date	Jordanian law establishes the date of publication of the expropriation notice as the cut-off date for eligibility. However, this not necessarily broadly disclosed (only a notice in newspapers). Significant gap against lenders requirements.	Not anticipated to be applicable.	NEPCO will proactively disseminate the cut-off date through specific stakeholder engagement upon the publication of the expropriation notice.
Compensation prior to impact	NEPCO has developed practice according to which compensation is paid only once the line is energized. Significant gap against lenders requirements.	Not anticipated to be applicable.	NEPCO should pay compensation prior to construction, unless a judicial process is triggered by the Project-Affected Person.
Entitlement of informal occupants	Jordanian law addresses formally registered landowners and formally registered lease holders only. International LAR standards require informal occupants to be compensated for any assets they own and to be supported in their efforts to restore their livelihoods. Significant gap against lenders requirements.	Not anticipated to be applicable.	There is emerging practice in some government-led projects in Jordan (e.g. Ministry of Water and Irrigation) to compensate affected assets (not land) to informal users under a compensation category that is permissible in law ("damages"). No Project impacts to informal users are envisioned at this point. If it turned out that there are such impacts, the Project would compensate affected assets on land (structures, trees and crops) to the owner of such assets regardless of the land occupation regime, and business loss of income (if applicable) regardless of the business land occupation regime and registration status.

Key lender requirement	Assessment of Jordanian law against key lenders requirements	Project measure to bridge potential gaps	Associated Facilities measure to bridge potential gaps
Assistance to vulnerable people ²	There are no specific provisions addressing vulnerable people in Jordanian land acquisition legislation. However, Jordan implements a complex and comprehensive social welfare system, with several components providing safety nets to the most vulnerable layers of the population, including people living in poverty, people with disabilities, divorced women, Palestinian and Syrian refugees (with support from UN specialized agencies), and others. Moderate gap against lender requirements.	Not anticipated to be applicable.	The Project will specifically identify any affected vulnerable group of individuals. If they are not supported by available social welfare and support systems, the Project will seek to facilitate their enrolment in such systems, in cooperation with relevant government agencies.
Indigenous Groups	Bedouin groups are not officially categorized in Jordan as Indigenous Peoples. All criteria pertaining to Indigenous Groups as listed in relevant IFC and AIIB policies are not concurrently applicable, hence the IP policy is not applicable. However, specific engagement and governance arrangements should be in place to ensure that herder groups are adequately engaged and participate in projects affecting lands used that they use grazing or other purposes, whether formally or informally. The policy is not applicable, hence no gap against lender requirements.	Not anticipated to be applicable. There is no herder group using Project land.	Herder groups have been observed near the transmission line corridor (two small camps in June 2026). They are present in the post-harvest period to graze their animals on crop residue based on informal agreements with landowners and farmers. NEPCO will specifically engage Bedouin herders using grazing land close to the transmission corridor to avoid any impacts to their movement or the safety of their animals during construction.
Livelihood restoration	Not specifically required by Jordanian law. Impacts to businesses and associated livelihoods are more significant, particularly in relation to displacing business structures and temporary access disturbance during the construction period. Significant gap against lenders requirements.	No land acquisition and no informal users, hence no impact to livelihoods.	Farmers are affected by relatively minor temporary impacts of the transmission line construction, and permanent impacts at towers. Since impacts are minor, livelihood restoration will be accommodated through compensation.

² Vulnerable groups in this context might include, but not be limited to disabled or incapacitated individuals, refugees, isolated minors, elderly people with no or limited family support.

Key lender requirement	Assessment of Jordanian law against key lenders requirements	Project measure to bridge potential gaps	Associated Facilities measure to bridge potential gaps
Monitoring and evaluation	Not specifically regulated by Jordanian law. Significant gap against lenders requirements.	This Land Acquisition Framework describes monitoring and evaluation principles, indicators and implementation arrangements.	This Land Acquisition Framework describes monitoring and evaluation principles, indicators and implementation arrangements.
Planning documentation and disclosure	Not specifically regulated by Jordanian law. Significant gap against lenders requirements.	This Land Acquisition Framework will be disclosed in line with Lender's requirements.	This Land Acquisition Framework will be disclosed in line with Lenders requirements.

5. ELIGIBILITY AND ENTITLEMENT STRATEGY

5.1 Key Principles, Eligibility and Cut-Off

Key Project commitments that will apply to Land Acquisition, Resettlement and Livelihood Restoration (LAR) in the context of the Project include the following:

- The LAR process will comply with both Jordanian law and international resettlement standards. Where there are differences between both sets of requirements, the most favorable ones shall be applied insofar as such application does not violate Jordanian law.
- The impacts of both permanent and temporary land occupation will be considered and offset. Similarly, impacts to livelihoods of temporary or permanent disturbance due to the Project construction or operation will be considered and offset.
- The cut-off date (in the sense of PS5 / AIIB's Standard 2) will be established based on applicable Jordanian legislation as the date of publication in local newspapers of the expropriation notice.
- Both formal landowners and users and informal occupants on public or other lands will be considered for compensation if they are eligible. Informal land occupants will not be eligible to compensation for land but may be eligible to compensation for fixed assets they own on affected land and/or for temporary disturbance and livelihood support.
- Compensation will result from a negotiated process as established in Jordanian law. Only in case a negotiation agreement cannot be reached shall a court process be initiated.
- Any compensation offer will be at fair market value in line with applicable Jordanian legislation.
- Impacts to both immovable assets (land, crops, trees, structures, businesses) and livelihoods, including temporary access disturbance during construction, will be considered.
- Vulnerable groups, who might potentially be disproportionately affected by land impacts, will be identified and specifically supported as necessary.
- The gender sensitivity of all measures will be assessed and any necessary mitigations of disproportionate impacts to women will be provided.
- Stakeholders that are relevant to the LAR process will be engaged at all stages of the LAR planning and implementation process per the Project Stakeholder Engagement Plan.
- An extra-judicial grievance mechanism will be established per provisions in this Land Acquisition Framework.
- Monitoring and evaluation will be provided per provisions to be detailed in this Land Acquisition Framework.
- The same land acquisition, compensation and livelihood restoration principles will be applied for the Associated Facilities, particularly the transmission line between the CCGT and the North Substation.

5.2 Cut-Off Date

Jordanian REOL and practice by Government agencies establish the cut-off date as the date of publication in local newspapers of the Expropriation Notice envisioned by the REOL (see also section 4.1.2), which lists affected land plots and identifies potentially affected landowners based on available cadastral information. Potentially affected landowners have a period of 15 calendar days from the date of publication to lodge a legal objection to the Expropriation Notice.

In usual Jordanian practice, while local newspapers are not necessarily broadly accessible or actually read in affected communities, local lawyers will typically monitor the press for expropriation notices and contact potentially affected landowners with a proposal to provide support in subsequent legal proceedings. This is the way the cut-off date is typically disseminated to affected people.

However, this does not meet PS5's requirement to "well document and disseminate" the cut-off date throughout the Project area. Therefore, the following specific activities will be implemented by NEPCO with Project support, in addition to the publication in local newspapers:

- Local posting of the Expropriation Notice in meaningful locations within affected communities (administration offices and others as appropriate);
- Community meetings to inform community authorities and local residents on the Project and the proposed expropriation.

5.3 Preliminary Entitlement Matrix

The following table presents a preliminary entitlement matrix. Note that only categories of losses identified as relevant to the Project and Associated Facilities are considered in this entitlement matrix.

Table 6: Preliminary Entitlement Matrix

Loss or impact	Eligible entity	Entitlement
Privately held land (agricultural, residential or commercial)	Landowner with registered ownership documentation (in category (i) of IFC's PS5 paragraph 17)	▪ Compensation at replacement cost as awarded either in the negotiated process envisioned by the REOL, or in the judicial process edicted by the same, including the value of any development upon land such as water wells, irrigation or drainage infrastructure, water rights, and any other structures – in cash ▪ If there is a lessee (see line below), the compensation may be shared between the landowner and the lessee according to provisions in Jordanian legislation and per agreement between the two parties ▪ In case of shared ownership, each co-owner will be compensated per the share they hold in the property ▪ This component of compensation (titled land) is under the responsibility of NEPCO and DLS.
	Lessee with formalized lease agreement (in category (ii) of IFC's PS5 paragraph 17)	▪ Share of the compensation due to the landowner for land and developments upon land, per agreement between the two parties ▪ This component of compensation (titled land) is also under the responsibility of MWI as it

Loss or impact	Eligible entity	Entitlement
		pertains to titled land plots and compensation to formalized lessees will be delivered by MWI Lessees will have to be identified as part of the RAP preparation
Informal agricultural use on State land	Informal agricultural land user (in category (iii) of IFC's PS5 paragraph 17)	- No compensation for land - Compensation for any fixed structures (e.g. greenhouses, irrigation and drainage infrastructure) owned by the informal occupant and livelihood restoration in respect of any loss of income - Compensation for trees and annual crops at replacement cost, taking the duration of the agricultural cycle into consideration
State land used for grazing	Individual herders or clans/tribes using land for grazing (in category (iii) of IFC's PS5 paragraph 17)	- Avoidance of disruption during construction wherever technically and economically feasible - Support to livelihood restoration where impacts are significant – in kind - Compensation could be delivered at clan or tribe level in the form of social amenities, subject to consultation with the relevant representatives of Bedouin herders
Private land used for grazing	Individual herders or clans/tribes using land for grazing (in category (iii) of IFC's PS5 paragraph 17)	- Avoidance of disruption during construction wherever technically and economically feasible - Support to livelihood restoration where impacts are significant – in kind - Compensation could be delivered at clan or tribe level in the form of social amenities, subject to consultation with the relevant representatives of Bedouin herders
Non-residential structures on private land	Owner of structure - in any category of IFC's PS5 paragraph 17	Compensation for structures at replacement cost – in cash
Trees and crops on private agricultural land	Owner of the trees or crops (not necessarily the landowner) - in any category of IFC's PS5 paragraph 17	Regardless of occupation status of the land, compensation at replacement cost for annual crops if they cannot be harvested before land take, and compensation at replacement cost for perennial crops (trees) – in cash
Affected vulnerable people	Vulnerable household	Supplemental support and facilitation of access to available State or NGO welfare support
Irbid District Electrify Company (IDECO)	Infrastructure owners	It is known that within the Project site transmission towers were observed on site that are not in use. Consultation with IDECO (owners of low voltage lines within the north of Jordan) must be undertaken to coordinate for removal of these lines.

5.4 Compensation Value

For rights-of-way created for transmission lines or pipelines, easement compensation is typically in the order of 20% of the market value of land. The market value of agricultural land in the Project area is estimated based on the comparative valuation method at around JOD 5,000 per dunum (EUR 6,2 per m²).

Compensation for government infrastructure projects can reach JOD 20,000 per dunum (EUR 25 per m²). Applying the usual right-of-way coefficient of 20% gives a range of compensation values between JOD 1,000 and JOD 4,000 per dunum. Where compensation amounts are decided by a court of law, both the market value of the land and the right-of-way coefficient are reviewed by the judge based on an independent valuation and the claims by the landowner (generally assisted by a professional lawyer specializing in such cases). Experience of expropriation in Northern Jordan suggests that most landowners apply to Court rather than accepting upfront the compensation offer from the State agencies involved in expropriation, and that Court-awarded values meet (or sometimes largely exceed) the market value of land.

5.5 Compensation Process

For the transmission line, which is to be designed, built and operated by NEPCO, as well as for the gas tie-in, the compensation process will be as follows:

- Detailed design and finalization of the corridor;
- Final identification of affected land plots based on cadastral data;
- Publication of an expropriation notice in local press, which will serve as the cut-off in the sense of international standards, and which will be complemented by direct engagement by NEPCO with affected landowners (not required in Jordanian law but meant to meet lenders consultation and disclosure requirements);
- Landowners then have 15 days to challenge the expropriation process by lodging a claim to the local court (e.g. challenging the very principle of expropriation in the public interest, not the compensation amount)³;
- The negotiated process then starts with survey and valuation (organized by the Department of Lands and Surveys – DLS, on behalf of NEPCO the expropriating agency), and negotiation in the form of a compensation offer presented by DLS and/or NEPCO to the landowner;
- If the offer is accepted by the landowner, an agreement is signed. In the case of transmission lines and pipelines, there is no transfer of property (including for towers). A right-of-way, or servitude, to the benefit of NEPCO is created and should be registered on the land title. Compensation is then paid after the line has been constructed and energized.
- If the amicable offer is not accepted, a court case is initiated before the local court. The judge will rely on an independent valuation to propose a new compensation amount. The affected landowner can appeal this first ruling (two levels of appeal up to the Court of Cassation)⁴.

³ This is uncommon in Jordan. The vast majority of legal challenges are in respect of compensation amounts.

⁴ Matters of land and expropriation are handled by secular courts, not by shari'a courts, which deal only with personal status matters such as family or inheritance.

6. ENGAGEMENT AND GRIEVANCE MANAGEMENT

6.1 Stakeholder Engagement

6.1.1 Stakeholder Identification

For this Project and its Associated Facilities, key stakeholders in the planning and implementation of the LAR process⁵ can be categorized as follows:

- Affected parties:
 - Physically displaced people;
 - Economically displaced people: farmers whose agricultural land plot is affected but whose residence is not affected, and herders temporarily using the Project area for grazing their animals;
- Interested parties:
 - Central government:
 - Ministry of Energy and NEPCO,
 - DLS,
 - Ministry of Finance,
 - Community level:
 - Community leaders, including Bedouin clan leaders,
 - Local women organizations and cooperatives,
 - Youth organizations,
 - Regional and local authorities;
 - Regional level (muhafazat);
 - District and municipal levels;
 - Local and regional Civil Society Organizations (CSOs);
 - Local, regional and national Non-Government Organizations (NGOs);
 - Lenders.

⁵ These LARLR-specific stakeholders are a sub-group within the broader stakeholder group that is interested or affected by the Project.

6.1.2 Stakeholder Engagement Planning

The stakeholder identification above will be refined at the stage of preparing the Project Stakeholder Engagement Plan (SEP). Stakeholder engagement for the LAR process will be based on overarching engagement principles in the Project overall SEP.

The engagement process at the stage of RAP preparation is shown in overview in the following graph:

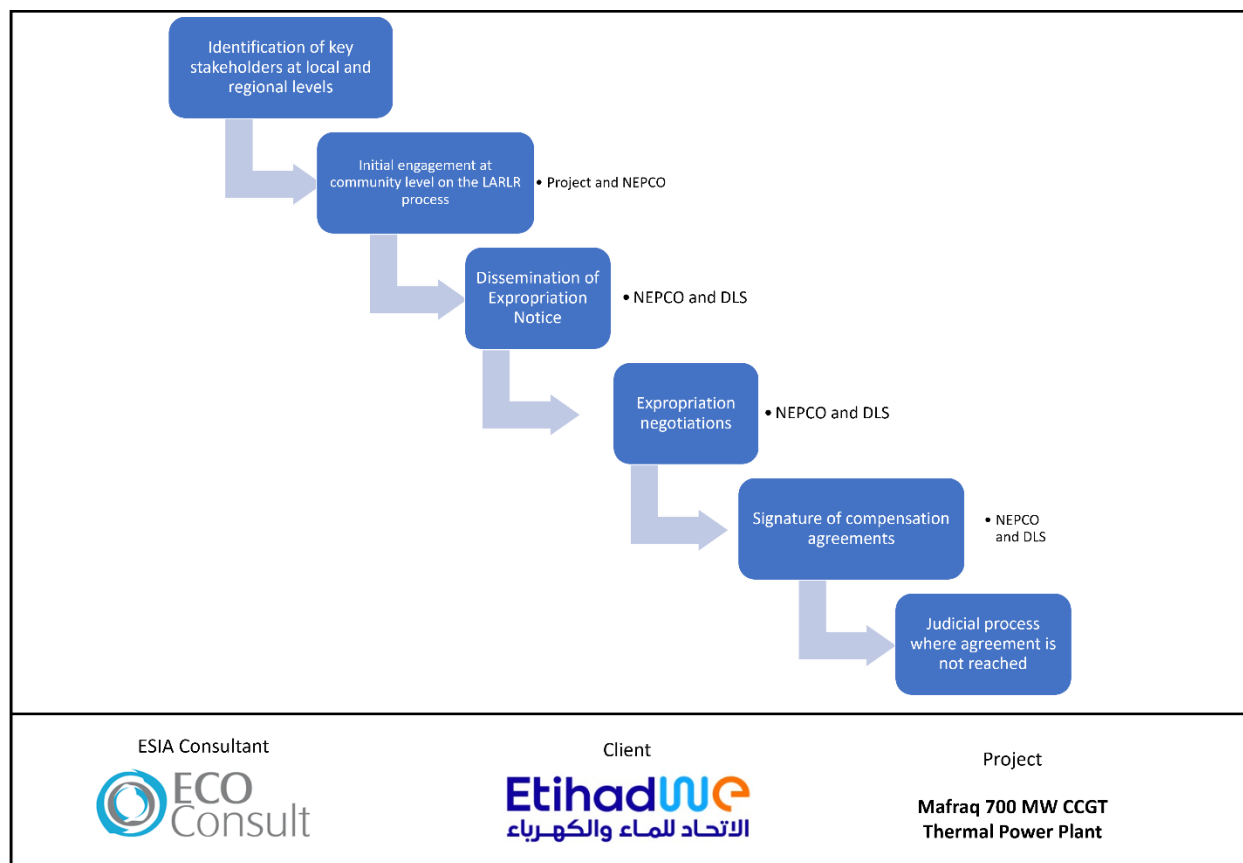


Figure 13: Overview of the Engagement Process for the LAR Component of the Project

6.1.3 Stakeholder Engagement Documentation

Stakeholder engagement events will be documented using available templates such as the ones described in the IFC 2023 Resettlement Handbook (see Module 3, section VII, table 3.7).

6.2 Grievance Management - Project

The grievance management process for the Project will be managed by Etihad and will include the following steps:

6.2.1 Step 1: Submission

Grievances may be submitted in person (through Project or NEPCO officers), by phone, email, grievance boxes at site offices, during public meetings or in any face-to-face interaction.

If a complaint is determined to be outside of the Project scope (e.g. related to impacts of another initiative in the same community), the Project team should clearly and concisely explain the reason for this and direct the person to other ways to deal with the issue in question. In such cases, the complaint will be closed and recorded as such in the complaint register.

6.2.2 Step 2: Registration and Categorization

Each grievance is recorded in an electronic grievance logbook and assigned a unique identification number. The complaint is categorized based on type, urgency, and location. Grievances related to compensation and livelihood restoration will be identified per the following categories:

- Disagreement on inventory (wrong identification, asset missed by surveyors, disagreement on characteristics, size or condition);
- Disagreement on valuation or final proposed compensation amount;
- Disagreement on substance of the compensation agreement;
- Payment delay;
- Other grievance.

Key fields in the grievance form will include:

- Grievance Number / Date / Name of Recorder / Location (Province/District/Settlement)
- Information about the Complainant: Name-Surname, Telephone, Address, Signature; Mode of receipt (Phone, In-person/Community meeting, Letter/Email, Other)
- Define/Describe the Grievance (free text)
- Details of Grievance (checkboxes or categories):
 - Access to Land and Resources
 - Damage to Infrastructure or Community Assets
 - Damage to or Loss of Livelihood
 - Traffic Accident / Injury
 - Incidents Regarding Expropriation and Compensation
 - Land Acquisition Process
 - Employment/Recruitment
 - Construction Camp and Community Relations
 - Other (specify)

- Preferred contact method for feedback.

6.2.3 Step 3: Acknowledgment

The complainant is informed in writing or verbally (depending on submission method) within 3 business days of receipt. The acknowledgement of receipt and form thereof and its date of receipt by the complainant is registered in the electronic grievance log.

6.2.4 Step 4: Assessment and Investigation

The designated Project or NEPCO grievance officer assigns the grievance to the relevant department or individual. Where the investigation is entrusted to a third party (e.g. Contractor), the Project remains responsible for liaising with this party and the complainant, as well as ensuring that the timeframe for responding is complied with. Investigations are conducted in coordination with relevant departments to determine causes, implications, and possible resolutions.

6.2.5 Step 5: Resolution

A proposed resolution is communicated to the complainant within 30 business days and duly registered in the electronic grievance log. If the solution is accepted by the aggrieved party, it is implemented promptly and recorded. All steps related to the communication of the proposed resolution are documented.

6.2.6 Step 6: Closure

Once resolved, the grievance is marked as closed in the electronic log, and the complainant signs a closure form to sanction the closure, including in case of disagreement on the proposed resolution.

6.2.7 Step 7: Monitoring and Reporting

Grievance trends and unresolved issues are monitored monthly as follows (all indicators disaggregated by gender and by grievance category – see section 6.2.2 above):

- Grievances opened in the month;
- Grievances closed in the month;
- Cumulative grievance backlog at the end of the month;
- Analysis by category of grievance, including recurrent grievance pertaining to the same type of issues (e.g. payment delays).

A grievance dashboard is developed for monthly reporting to Project management and Lenders. Feedback is used to prevent recurrence and improve future engagement.

6.3 Grievance Management – Associated Facility

NEPCO will follow a similar process for grievances related to the associated transmission line. As part of ESAP implementation support to be provided through the EBRD, it is expected that NEPCO will, amongst others, adopt a grievance management system compliant with international requirements such as PS1 and PS5. The timeline of the ESAP implementation support (anticipated to commence in Q3, 2026) funded by EBRD is compatible with that of the land acquisition process for the transmission line associated to the Project and the establishment of a compliant grievance management system will be treated as a priority.

7. LIVELIHOOD RESTORATION

7.1 Key Principles

Jordanian legislation does not include specific provisions for livelihood restoration activities; however, it is an absolute requirement under PS5/Standard 2 (“as well-off if not better-off”), with a distinction between:

- Land-based livelihoods (agriculture, animal husbandry, reliance on land-related natural resources), for which land must preferably be replaced rather than compensated in cash and support must be provided to re-establish sustainable and reasonably profitable agricultural activities;
- Non-land-based livelihoods (e.g. businesses): in the case of the Project, this is not anticipated to be relevant).

Good practice also mandates specific attention to women, the youth, and vulnerable groups in devising livelihood restoration activities tailored to the needs of these groups.

In the case of the Project and its Associated Facilities, livelihood impacts are anticipated to be the following:

- Agriculture:
 - As mentioned above, the Project itself has no livelihood impact since there is no land use at the Project site;
 - The transmission line affects 99 land plots, about half of which are actively used for non-irrigated agriculture; however, impacts are of a temporary nature (construction period) while agricultural use can resume normally under the line (with the exception of the footprint of the towers) after construction;
- Grazing: two Bedouin herder camps were observed in June 2026 to use the area of the transmission line corridor for grazing; this is temporary use for a few weeks while there is crop residue available and the area they use for grazing is vast compared to the transmission line corridor. This activity will be disrupted on a temporary basis during construction (say one season) and can resume normally after construction.

Livelihood impacts are therefore assessed as negligible. To the extent possible, construction of the transmission line will be scheduled to minimise impacts to farming and grazing since these activities are a temporary nature. It does not appear that potential livelihood impacts of either the Project or its Associated Facilities warrant specific livelihood restoration activities.

Farmers will be engaged before construction: to the extent feasible, construction will be phased to minimize temporary impacts on cultivation in land plots actively used for agriculture.⁶

Bedouin herders will be engaged before construction and monitored throughout construction and early phases of operations to check that there is no unanticipated impact to their activities. As usual with such activities in Jordan, they will be invited to move slightly during construction from the area of transmission

⁶ Rainfed barley is a winter crop in the area, sowed in November and harvested in May-June. That could leave a window of about 5 months to execute the construction in the actively farmed areas towards the Western end of the line. However, the period during which there is no barley in the field is also the period during which animals are grazed on residue.

line construction activities, which experience in Jordan suggests is usually possible without any significant impacts. Specific measures will be taken to ensure the safety of animals and their herders.

7.2 Support to Vulnerable People

At this point during the ESIA process, no specific vulnerable groups have been identified. As mentioned above, farmers and herders will be monitored during LAR implementation and line construction. If any disproportionate impacts or specifically vulnerable groups, households or individuals are identified, they will be supported through adequate measures or directed to relevant welfare departments at municipal or state levels.

8. MONITORING AND EVALUATION

8.1 Principles

Monitoring and Evaluation are key components of the LAR process and are required by international resettlement standards. The Monitoring and Evaluation process examines what worked with the process and why, what did not and why not, and what adjustments, changes or corrective actions need to be made.

Monitoring is the measurement through time that indicates the movement toward the objective or away from it. Monitoring provides the raw data to answer questions.

Evaluation is putting those data to use, thus giving them value. From a practical perspective the aim is to identify the need for any changes or corrective actions that need to be made to reach the ultimate objectives, particularly fair compensation and livelihood restoration.

Monitoring and Evaluation are typically divided into two key components, as defined below:

- Input and output monitoring (or activity monitoring),
- Outcome (or impact) monitoring.

Activity monitoring: Measures whether inputs are provided and outputs delivered on schedule and as defined in the initial plan. Inputs are the services, resources or goods that contribute to achieving outputs and, ultimately, desired outcomes. Outputs are the direct measurable results of the inputs. Activity monitoring keeps track of project implementation efficiency and indicates whether changes need to be made to make the program operate more efficiently. Activity monitoring is done internally on an on-going basis, often as part of the project general management system or quality assurance system.

Outcome (or impact) Monitoring: Defines the extent to which the project inputs and outputs are achieving or are likely to achieve the expected outcomes of a program. A typical outcome that requires monitoring is livelihood restoration. Outcome evaluation, coupled with output monitoring results, indicate whether the program is genuinely working and should continue to be implemented as is, or whether fundamental changes have to be made. Outcome monitoring can be carried out by an external independent group.

Outcome monitoring can be integrated with the process of Compliance and Completion Monitoring and auditing, which is mandated in certain cases by international resettlement requirements such as the IFC's PS5 or AIIB's Standard 2.

8.2 Indicators

8.2.1 Activity Indicators

The Project will use activity indicators and KPIs shown in the table below. Activity monitoring will be carried out internally.

Table 7: Input and Output Indicators

Indicator	Source of Information and Responsibility	Frequency
Input indicators		
Overall spending on LAR	Financial records – NEPCO and DLS	Quarterly

Indicator	Source of Information and Responsibility	Frequency
Number of PAPs by categories described in the entitlement matrix	PAP database - Project	Quarterly
Output indicators		
Number of negotiation sessions with Project-Affected People (transmission line and gas tie-in)	Financial records – NEPCO and DLS	Monthly
Number of people having received compensation in the period with distribution by compensation type and by classes of amounts	Financial records – NEPCO and DLS	Monthly
Number of individual compensation agreements signed in the period	NEPCO and DLS	Monthly
Number of individual compensation agreements signed in the period	NEPCO and DLS	Monthly

8.3 Outcome Monitoring

The Project will use indicators and KPIs shown in the table below to carry out outcome monitoring of its LAR activities.

Table 8: Outcome Indicators

Indicator / Issue	Measured how - Responsibility	Frequency
Average time for grievance processing	Time interval between grievance registration and closure - Project	Quarterly
Number of open grievances and trend in time	Grievance Management System – Project Disaggregated by gender	Quarterly
Number of grievances opened in the period and trend in time	Grievance Management System – Project Disaggregated by gender	Quarterly
Number of grievances closed in the period and trend in time	Grievance Management System – Project Disaggregated by gender	Quarterly
Reoccurring complaints	Grievance Management System – Project	Quarterly
Average time for payment of compensation	Time interval between compensation agreement and compensation delivery – Project based on NEPCO and DLS records Disaggregated by gender	Quarterly
Use of compensation	What has compensation been used for? Survey of compensated households. Disaggregated by gender	Yearly
Restoration of farming	Have affected farms been successfully re-established? Comparison of surfaces and agronomic potential in pre- and post- displacement situations. Disaggregated by gender to the extent relevant.	Yearly
Mitigation of impacts to herders	Engagement with herders before and during construction, then on a yearly basis to check whether any specific impacts to grazing are experienced that may require livelihood restoration activities. Disaggregated by gender to the extent relevant.	Yearly

8.4 Compliance Monitoring

The Project has procured the services of an external compliance auditor (Lender Environmental and Social Advisor - LESA) to assess whether its implementation complies with international requirements (amongst others, IFC's PS5 and AIIB's Standard 2).

In the course of Project implementation, the LESA will review the following aspects:

- General:
 - Assess overall compliance with commitments in this Framework and with PS5/Standard 2;
 - Interview from time to time a representative cross-section of affected households and enterprises to measure the extent to which project affected people's standards of living and livelihood are being restored or enhanced; and to gather their opinions on compensation delivery, resettlement housing and grievance management;
- Compensation process:
 - Review if entitlements are delivered in time and, if not, whether any delays are justified;
 - Check that compensation is at replacement cost;
- Livelihood restoration:
 - Assess the extent to which the quality of life and livelihoods of affected communities are restored;
 - Review any livelihood restoration / rehabilitation programs and the extent to which they are assisting in providing alternative livelihoods for affected households to help offset the impacts of displacement;
- Monitoring & Evaluation:
 - Review internal monitoring and reporting procedures to ascertain whether these are being undertaken in conformance with the RAP and LRP;
 - Review internal monitoring records as a basis for identifying any potential areas of non-compliance, any recurrent problems, or potentially disadvantaged groups or households;
- Grievances:
 - Review grievance records for evidence of significant non-compliance or recurrent poor performance in land acquisition implementation or grievance management;
- Implementation:
 - Assess whether resources are adequate for implementing the LAR process and any training or capacity building requirements;
 - Assess the data management system and its outcomes;
 - Compare actual progress with initial schedule.

Compliance monitoring will take place twice a year during active implementation of the land access program, starting when land acquisition negotiations commence. The external consultant (LESA) will

dedicate approximately 1 day in each of these missions to LAR issues. Each of the LESA visits will be sanctioned by a report prepared independently for the Developer and the Lenders. The LESA will also prepare the “Completion Note” required under AIIB E&S Standard 2.

8.5 Completion Audit

The limited extent of LAR impacts does not warrant a completion audit for the Project or Associated Facilities (IFC, PS5, paragraph 15⁷). AIIB requirements need a “Completion Note” to be prepared, which will be prepared by the LESA upon conclusion of their compliance monitoring.

⁷ Quote: “It may be necessary for the client to commission an external completion audit of the Resettlement Action Plan or Livelihood Restoration Plan to assess whether the provisions have been met, depending on the scale and/or complexity of physical and economic displacement associated with a project.” Unquote

9. IMPLEMENTATION ARRANGEMENTS

9.1 Roles and Responsibilities

The Project entails no land acquisition. In regards of Associated Facilities, the following table shows roles and responsibilities for the different activities and tasks required by the LAR process.

It is important to note that the responsibilities for the Developer identified below will be undertaken to the greatest extent possible, exercising all possible efforts with NEPCO and other governmental institutions involved. However, it is important to note that the Developer does not have any authority or influence over NEPCO to ensure their compliance, participation or implementation of the LAR process.

Table 9: Roles and Responsibilities

Theme	Activity	Responsibility
Stakeholder engagement	Initial engagement on Project and associated facilities (ESIA disclosure)	Developer
	Disclosure of expropriation intention to affected landowners	NEPCO - DLS
	Negotiations with landowners on compensation	NEPCO - DLS
	Document stakeholder engagement process	Developer, with NEPCO-DLS inputs for LAR issues
Grievance management	Establish grievance management system	Developer
	Disclose grievance management system	Developer
	Operate grievance management system	Developer, with NEPCO-DLS inputs for LAR issues
	Make sure grievances are timely closed and monitor grievance management system	Developer
Negotiated LAR process	Engage landowners in negotiations around compensation	NEPCO-DLS
	Close negotiations with compensation agreements	NEPCO-DLS
	Document negotiations and their outcomes	Developer, with NEPCO-DLS inputs for LAR issues
Monitoring of judicial process	Monitor progress of judicial process	NEPCO-DLS
	Document outcomes of judicial process for reporting purposes	Developer
Engagement with herders	Engage herders around construction disruption and restrictions of access during construction	NEPCO
	Monitor herder movements during construction and engage herders if any risky movements are observed	NEPCO
Livelihood restoration	Organize a survey of affected farmers and herders after construction to check on any disproportionate impacts	Developer
Vulnerable people	Take the opportunity of above survey to identify vulnerable groups, households or individuals, if any	Developer
	In case vulnerable groups, households or individuals are identified amongst affected people, devise specific assistance measures	Developer
Monitoring and evaluation	Organize monitoring per provisions in chapter Error! Reference source not found. 8 of this RF	Developer
	Provide LESA and lenders with periodic reports on the LAR process, consolidating information from NEPCO and DLS as warranted	Developer

	Organize periodic missions per LESA terms of reference to check on LAR process, amongst others	LESA
Preparation of LRP	Procure LRP services	Developer
	Implement LRP surveys including livelihood surveys	NEPCO/DLS and Developer (Joint Commission)
	Prepare draft LRP document for Lender review	Developer
	Disclose draft LRP and consult thereupon	Developer
	Finalise LRP	Developer

9.2 Path to the LRP

A Livelihood Restoration Plan will be required for the Project per PS5 requirements. The LRP will be structured per the tentative structure shown in Annex 3. An example of census form (to be adapted) is also shown in Annex 4. It will address all Associated Facilities, including the transmission line (NEPCO) and the water pipeline (WAJ) if it is confirmed that the water pipeline does have impacts to private lands (not anticipated at this time since the pipeline is located within existing rights-of-way).

LRP preparation services will be procured by the Project on behalf of NEPCO to ensure consistency with international lender requirements. The process of LRP preparation will be undertaken in close cooperation with NEPCO and formal agreement by NEPCO to the final document will be sought by the Project. Surveys will be implemented, to the extent acceptable by NEPCO, by a joint group of NEPCO and DLS representatives on the one hand, and Project representatives on the other.

The time required for preparing the LRP is three months. This will be factored into the overall project development schedule and covenanted in the ESAP.

The budget for the LRP will be structured as follows (detailed costing to be provided in the LRP, at this point in time only tentative percentages of funding are shown to outline responsibilities):

Table 10: LRP Budget Structure (to be costed in LRP)

#	Item	NEPCO (kJOD)	Developer (kJOD)
1	Land acquisition per final compensation agreements (whether amicable or judicial), including compensation to identified landowners and tenants	100%	0
2	Structure compensation if not included in compensation agreements (informal structures) – not anticipated at this point to be relevant	0	100%
3	Crop and tree compensation if not included in compensation agreements (informal users) – not anticipated at this point to be relevant	0	100%

#	Item	NEPCO (kJOD)	Developer (kJOD)
4	Livelihood restoration	0	100%
5	Monitoring and evaluation	0	100%
6	LRP Preparation	0	100%
7	Consultation and disclosure of LRP	0	100%
8	Grievance management	50%	50%

9.3 Funding Arrangements

Land acquisition by NEPCO for the Associated Facility will be funded by the State of Jordan. A budgetary allocation is made by the Council of Ministers based on a tentative budget for land acquisition submitted on a yearly basis by the Ministry of Energy. This can be adjusted as needed once Court decisions are issued.

9.4 NEPCO's Capacity Building

NEPCO has received a grant from the European Union (administered by the EBRD) to enhance its capabilities in implementing projects to international standards, amongst others with respect to E&S compliance. The capacity building process is part of an ESAP compliance process mandated under an EBRD loan and is due to commence in Q3, 2026. It is anticipated to involve the following:

- Development of policies, processes and procedures, amongst others with regards to land acquisition, resettlement, compensation and valuation, stakeholder engagement, livelihood restoration, grievance management to reach international compliance within the framework of Jordanian regulations;
- Staff capacity-building and training on the above topics in seminars and webinars, as well as on-the-job training in real projects and site visits;
- Management awareness development to seek mainstreaming of compliance with international requirements within all corporate activities.

This capacity-building project is an important factor in the development of NEPCO's ability to meet their commitments under this project for the associated facility under their responsibility.

9.5 Indicative Timeline

Experience in the area shows that most, if not all landowners will not enter into negotiated agreements and will seek judicial redress in regards of their compensation amounts.

Another factor that extends the timeline for LAR in rural areas of Jordan is multiple ownership, where a single plot can be held undividedly by up to 20 different shareholders, all of whom will have to express their consent to expropriation proceedings, whether amicable or judicial. This is linked to the structure of ownership, where land plot ownership is divided between multiple inheritors upon the demise of the initial owner. Typically, only one or two of these multiple shareholders actually uses the land, while the others have different sources of livelihoods and can sometimes live elsewhere, including in foreign countries. Tracing these multiple owners and obtain their powers of attorney so that they consent to the expropriation proceedings can take significant time.

NEPCO recently triggered the land acquisition process for the transmission line. Experience suggests that the LAR process is anticipated to take about 18 to 24 months, depending on the number and degree of appeals.

10. ANNEXES

10.1 Annex 1 - Article 22 of Jordan's General Electricity Law No. 10 of 2025

Unofficial English translation from the original Arabic version

Article (22):

A. The licensee for generation, transmission, independent transmission, distribution, or the licensee for storage as an independent activity shall pay fair compensation to the affected party for damages inflicted upon him or his movable and immovable property as a result of the licensee carrying out the works stipulated in Article (21) of this Law. The following entities are exempted from the compensation referred to in this paragraph:

1. Ministries, government departments, official public institutions, the Greater Amman Municipality, and municipalities.
2. The consumer who is directly supplied with the service by the licensee.

B. If an agreement cannot be reached between the relevant licensee and the affected party on the amount of compensation, the compensation determined by the court shall be paid in accordance with the provisions of Paragraph (C) of this Article.

C. The affected party shall be compensated in accordance with the provisions of this Law for the decrease in the value of the affected portion of the land under, through, or over which electrical installations pass, as of the date of establishment of those installations. When calculating the affected portion of the land, the electrical safety clearance distances specified by the Authority in accordance with the provisions of this Law shall be taken into account.

D. The compensation determined pursuant to Paragraph (C) of this Article shall accrue annual legal interest at the rate decided by the Council of Ministers upon the recommendation of the Board [of Commissioners], calculated from the date of establishment of the electrical installations until the date of payment of the determined compensation.

E.

- 1- No claim for compensation shall be heard after the lapse of three years from the date of establishment of the electrical installations.
- 2- No compensation claim against the licensee shall be heard if ownership of the land was acquired after the establishment of the electrical installations.

10.2 Annex 2 - Article 44 of Jordan's General Electricity Law No. 64 of 2002

Unofficial English translation from the original Arabic version

Article (44):

A- A generation licensee, transmission licensee, or distribution licensee shall pay a fair compensation to the person who suffers a damage or whose properties, whether movable or immovable, is damaged as a result of works carried by the licensee.

B- Where an agreement cannot be reached between the concerned licensee and the aggrieved party on the amount of compensation, then compensation as determined by the court in accordance with the provisions of paragraph (C) of this Article, or otherwise by arbitration if chosen by the parties, shall be paid.

C- The aggrieved party shall be compensated pursuant to the provisions of this Law for the devaluation of the affected area of land due to installation of the electrical installations on the date of their installation, provided that when computing the affected area of the land the considerations of electrical clearance safety as determined by the Commission shall be taken into account.

D- The compensation determined pursuant to paragraph (C) of this Article shall be subject to an annual legal interest at a rate to be determined by the Council of Ministers provided that it shall be computed as from the date of construction of the electrical installations or from the date of purchasing the land, whichever is more recent, and until the payment of the determined compensation.

E- The provisions of paragraphs (C) and (D) of this Article shall apply to the electrical installations constructed before coming into force of this Law.

F- No claim for compensation or interest pursuant to paragraphs (C) and (D) of this Article shall be entertained after the expiry of three years from the date of coming into force of this Law with respect to electrical installations that have been constructed before the coming into force of this Law, or after the expiry of three years from the construction of such electrical installations that will be constructed after the coming into force of this Law.

10.3 Annex 3 – Indicative Structure of the LRP for Associated Facility

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10.4 Annex 4 – Census Form (tentative)

Q ID	Form Number	_ _ _ _	
Work Stages			
Q1	Date of Visit	2026 / /	
Q2	Time of visit	_ _ : _ _ : _ _	
Q3	Name of the Field Researcher	_ _	
Q4	Supervisor Name	_ _	
Q5	The result of the visit	1 Completed/ Interviewed 2 Partial (to be completed later)/ Appointment taken 3 The wanted person is out of the area and inaccessible (no one knows anything about him) 4 Traveler 5 No Qualified Person 6 Sick / Incapacitated / Elderly 7 Refusal to receive 8 Refusal to answer/ Refuse to interview 9 Other (select)	
Section I: Identification and Geographical Data of the Plot			
Q101	Description of the boundaries of the parcel (name of the main street, name of the sub-street, distinctive landmark...)		—
Q102	Geographical location (coordinates)		—
Q103	Directorate by Registration deed		—
Q104	Registration Number by Registration deed		—
Q106	Village by Registration Document		—
Q107	The name of the basin according to the registration deed		—
Q108	Name of the neighborhood according to the registration deed		—
Q109	Plot number according to the registration deed		_ _ _ _
Q110	Dock number according to the registration deed		_ _ _ _
Q111	Neighborhood number according to the registration deed		_ _ _ _

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		3 Residential Villa 4 Commercial Villa 5 A complex consisting of several facilities and offices 6 Independent commercial shop (showrooms, retail or wholesale shops, car maintenance shops, etc. etc. 7 Booth 8 Home Production Project 9 Warehouse/Warehouse 10 Other Select	
Q204	Total building area or area (m ²) on a plot		—
Q205	Permanent Building Number (Municipality/Municipality Number)		—
Q206	Number of floors		—
Q207	Number of units or dwellings within the building		—