



# 2023 ANNUAL ACTIVITY REPORT

Complaints-resolution, Evaluation and Integrity Unit

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Complaints-resolution, Evaluation and Integrity Unit (CEIU)



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## **ABBREVIATIONS**

AIIB Asian Infrastructure Investment Bank

ADB Asian Development Bank AfDB African Development Bank

AMEDD Agreement for Mutual Enforcement of Debarment Decisions

ARC Audit and Risk Committee

BHRC Budget and Human Resources Committee

CAO Compliance Advisor Ombudsman

CEIU Complaints-resolution, Evaluation and Integrity Unit

CSOs Civil Society Organizations

DCD Development Cooperation Directorate

EBRD European Bank for Reconstruction and Development

EIB European Investment Bank
ELA Early Learning Assessment

EvalNet Network of Development Evaluation GRMs Grievance Redress Mechanisms

HOI Heads of Integrity

IAM Independent Accountability Mechanism

IAMnet Independent Accountability Mechanisms Network

IFC International Finance Corporation
IFI International Financial Institutions

MCDF Multilateral Cooperation for Development Finance

MDB Multilateral development banks

MICI Independent Consultation and Investigation Mechanism

MOOS Massive Open Online Seminar
OTP Operational Training Program

PPM Project-Affected People's Mechanism

PPP Policy on Prohibited Practices
PSC Policy and Strategy Committee

UNDP United Nations Development Programme

WB World Bank

WHO World Health Organization

## **FOREWORD**

I am delighted to share with you the 2023 Annual Activity Report of the Complaints-resolution, Evaluation and Integrity Unit (CEIU or the Unit) of the Asian Infrastructure Investment Bank (AIIB or the Bank). This report is designed to be a concise and consolidated document that highlights significant accomplishments and summarizes the main activities that our team has delivered in the previous year. More importantly, this report ensures that CEIU remains transparent and accountable to all relevant AIIB stakeholders.





The year 2023 was a transition period for CEIU. As CEIU's new Managing Director, I am honored to lead a small yet capable group of professionals who are responsible for delivering the work of this oversight unit. As the Bank grows its operations, it is imperative that CEIU will also have to grow alongside it. With the full support of the AIIB Board of Directors and Management, we began the process of strengthening CEIU's professional resources in 2024 to ensure that the Unit can fully support current and future AIIB activities.

Building on the success of CEIU since inception, we are also moving the Unit into its second phase of growth. To this end, we have initiated a review of CEIU's activities, approach and key priorities following the Delivery, Efficiency, Effectiveness and People (DEEP) Approach. The DEEP approach has helped us to sharpen the accomplishment of CEIU's role in AllB by defining and committing ourselves to implementing a set of priority actions for the next five years. This approach is part of the larger process of developing a CEIU Strategic Directions Paper, which we intend to deliver to the Board in early 2024.

Focusing on last year's activities, I am also proud to confirm that CEIU has continued to successfully deliver on its oversight mandate across all three functions. One of our key priorities, which we started in 2023, is the review of the Policy on Project-Affected People's Mechanism (PPM). We are on track to complete this process in 2025 following a planned extensive consultation process with relevant stakeholders next year. We also advanced the delivery of two firsts in the Learning and Evaluation function: the first thematic assessment—an Early Learning Assessment (ELA) on the project-level Grievance Redress Mechanism—and the first ELA on an AllB financing approved under the Board's delegated authority. As part of our Integrity agenda, we have supported the operations of AllB's independent Sanctions Panel, and have taken a significant step in the direction of eventually being part of the multilateral development bank cross-debarment agreement. The intention of all of these efforts is to ensure that AllB's anti-corruption infrastructure is complete, always up-to-date, fully operational and entirely aligned with our peers.

Accountability and learning are at the heart of CEIU's role in AllB, and our goal is to continue to effectively deliver on these responsibilities in the coming years through the specific priorities that we have identified, and on which we have already started working. With the initiatives we have undertaken in 2023 and will continue to put in place in the coming years, I am confident that CEIU is, and will be well-placed, to effectively support the Bank in investing in tomorrow's infrastructure.

#### **Marvin Taylor-Dormond**

Managing Director, CEIU Asian Infrastructure Investment Bank



# JOINT STATEMENT

### From the Chairs of the Policy and Strategy Committee and the Audit and Risk Committee

We are pleased to welcome the 2023 Annual Activity Report of the Complaints-resolution, Evaluation, and Integrity Unit (CEIU or the Unit). Despite natural adjustments due to the Unit's leadership transition, the CEIU team delivered a significant work program last year, effectively contributing to the accountability function of the Asian Infrastructure Investment Bank (AIIB or the Bank). We have seen the Unit grow into a strong and respected organizational component within AIIB and have high hopes that it will become an agent of change in the wider multilateral development bank community. With the recent appointment of its new Managing Director, Marvin Taylor-Dormond, we trust that CEIU is well-positioned to further its accountability and learning mandates in AIIB during the coming years.

We recognize that CEIU has delivered its mandate since inception with a limited staffing complement, and we fully support the scaling up of staff resources in 2024 to strengthen the Unit's capacity to face the growing demands of work in its area and effectively support the Board of Directors' oversight function. We expect that the work of the Unit will become even more critical and necessary as AIIB increases its lending portfolio and develops new products. In particular, we are cognizant of the actual and potential increasing number of complaints in CEIU's Complaints-resolution and Integrity functions, which will require greater attention from CEIU. Likewise, regarding the Learning and Evaluation Function, as a greater number of AIIB projects come to completion, we envision significant advancements in both project and higher plane evaluative exercises. For all three functions, we look forward to CEIU's contributions to strengthening the accountability and learning functions of the Bank, through its support to the Board and independent assessment of AIIB's institutional effectiveness.

Finally, we appreciate the progress made in defining the strategic directions of the Unit, including the emphasis on Delivery, Effectiveness, Efficiency and People (DEEP) and the self-reflection exercise to enhance CEIU's role and the value it adds to AllB in the years to come, as an independent entity reporting to the Board. We look forward to productive engagement between the Board and CEIU in 2024.

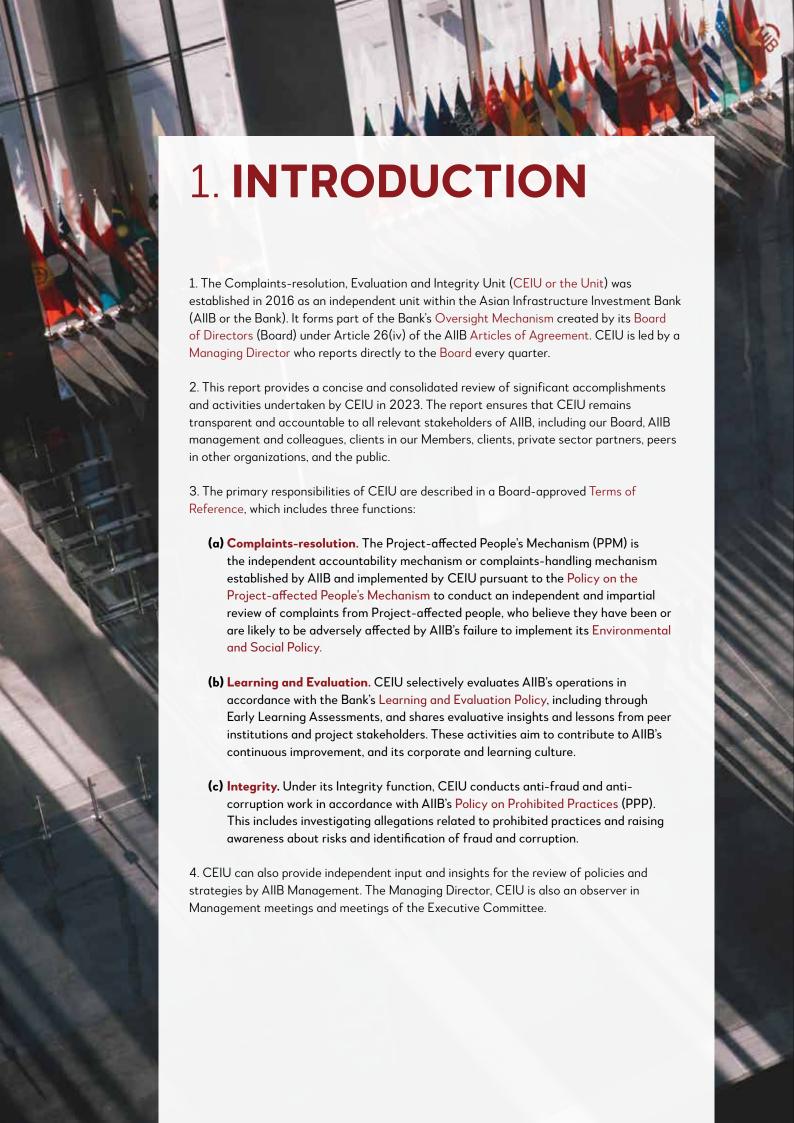
#### David Osborne

Chair, Policy and Strategy Committee Sep. 19, 2022 to June 30, 2024

#### Fabrizio Costa

Chair, Audit and Risk Committee Sep. 14, 2022 to June 30, 2024





#### 1.1 Reporting to the Board of Directors

5. As a Board-reporting unit, CEIU provides regular updates to the Board in a format consistent with the regular Management updates. The Board supervises AllB's Management through review of Management reporting to the Board on all areas of the Bank's business. There are three Board committees that assist the Board in its supervision: the Policy and Strategy Committee (PSC), Budget and Human Resources Committee (BHRC), and Audit and Risk Committee (ARC). CEIU provides detailed reporting on specific areas of work to these Board committees. In particular, requests received by the PPM and Early Learning Assessment reports are presented and discussed in the PSC while investigation of Prohibited Practices and related issues are reported to the ARC.

#### 1.2 Work Plan and Budget

6. CEIU's Annual Workplan and Budget are presented to the Board as a separate appendix to AIIB's annual Business Plan and Budget. The 2023 Workplan included work activities confirmed by CEIU's Managing Director for the year, which were aligned with the Bank's corporate strategy.

7. CEIU's budget is a separate line item in the Bank's budget. CEIU's total variable budget in 2023 was USD1.25 million for all three functions, which includes a 32% contingency fund for investigations under the PPP and PPM. By end of 2023, the overall utilization rate was 33%. The low utilization rate is due to the change of CEIU management at the end of Q2 2023, an absence of cases that required the use of the investigation contingency fund, and postponement of some 2023 Learning and Evaluation activities to 2024, as the approved position for this function was not filled in 2023.

#### 1.3 Staffing

- 8. CEIU's new Managing Director began his five-year term on May 1, 2023.
- 9. As of December 31, 2023, CEIU has five active staff members (four professionals and one support staff). There were also two resignations (one analyst level and one outsourced administrative staff) in Q3 2023. The hiring processes for their replacements began in Q4 2023 with expected onboarding in Q1 2024 for both positions, as part of a broad new staffing plan that CEIU has undertaken, which also includes the hiring of three additional senior professionals (one for each function) and one analyst in Q4 2023-Q1 2024.
- 10. To support its 2023 operations, CEIU also engaged the services of 13 short-term consultants who supported the Unit for short-term and specific tasks across the three functions. In addition, CEIU also availed of a short-term intern from the AIIB Internship Program in Q2 2023 to provide research and administrative support to PPM-related activities and data processing assistance for the Integrity function.



# 2. HIGHLIGHTS OF 2023 CEIU ACTIVITIES

#### 2.1 Development of CEIU's Strategic Direction Paper

11. **CEIU DEEP Approach.** Under the leadership of its new Managing Director (MD) Marvin Taylor-Dormond, in 2023, CEIU adopted a framework based on the principles of Delivery, Effectiveness, Efficiency, and People (DEEP). The DEEP Approach is the first step in a series of activities that will culminate in the issuance of CEIU's Medium-Term Strategic Direction Paper. Through the DEEP exercise, CEIU identified and documented a set of priority actions for itself and each of its functional areas, as well as providing a baseline for the monitoring and assessment of improvements in its work for the next three years.

12. **CEIU Self-Reflection**: As a follow up to the DEEP exercise, CEIU initiated a Self-Reflection Exercise in late 2023. The purpose of this exercise is to assess the extent to which CEIU is fulfilling its dual mandate of accountability and learning. It considered CEIU's experiences so far, underscored its strengths, highlighted areas for improvement, and identified opportunities for informing its future strategic direction. An international expert was hired to support this exercise. Together with CEIU staff, the expert met with relevant internal stakeholders, including with President, Board members, Vice Presidents, Director Generals, General Counsel, Advisors of the President, current and former MDs of CEIU, and CEIU staff. This exercise will inform the Strategic Direction Paper that CEIU will prepare and present to the Board in 2024. The Strategic Direction Paper aims to define CEIU's approach and key directions for the next five years.

13. Overall, 2023 was a productive year for CEIU's three functions. The highlights for each function are presented below. In addition, the details of the specific activities for the three functions are presented in the subsequent chapters of this report.

# 2.2 Complaints-resolution: Launch of the Project-affected People's Mechanism Policy Review

14. **CEIU** initiated a review of the Project-affected People's Mechanism (PPM) Policy in **2023**. The PPM policy was adopted by the Board on December 7, 2018, and entered into effect on March 31, 2019. The PPM Policy mandates a review no later than five years from its adoption (PPM Policy, Clause 11.4). It also states that the MD shall initiate and guide the review, which shall take into account the views gathered through public consultations, including with communities affected by projects, AllB Members, clients, and other

stakeholders. Thus, the PPM Policy Review (PPM Review) is due in 2025. The Roadmap for the PPM Review was endorsed by the Policy and Strategy Committee (PSC) on December 4, 2023 and is now available on the PPM Policy Review Page.

# 2.3 Learning and Evaluation: Delivery of a First Thematic Study and an Early Learning Assessment on Financing Approved Through Delegated Authority

- 15. **CEIU** issued its first thematic assessment on Project-level Grievance Redress Mechanisms (GRMs) in AIIB Operations. CEIU's Learning and Evaluation function undertook a first thematic assessment, a portfolio-level Early Learning Assessment (ELA) on "Project-level Grievance Redress Mechanisms (GRMs) in AIIB Operations." This was a high-priority Board request and involved a literature review; assembly and analysis of GRM-related digital documentation in the active portfolio of AIIB project financings; and preparation of an ELA paper for discussion in the AIIB Management Meeting and PSC. The report was well-received and stimulated various Bank activities to further strengthen documentation and reporting on GRMs.
- 16. **CEIU** also undertook the preparation of a first **ELA** of an **AIIB** financing approved through delegation under the **Accountability Framework in 2023**. The report will be concluded and discussed by the PSC in Q1 2024 and provide insights toward the update of the AIIB Accountability Framework in 2024.

#### 2.4 Integrity: Support the Operations of the Sanctions Panel and a Significant Step Towards Cross-Debarment

- 17. **Supporting the Operations of the Sanctions Panel**. In 2023, CEIU hosted two in-person meetings of the Sanctions Panel in AllB Headquarters in Beijing (June 26-27 and December 10). The Sanctions Panel convened in person for the first time to discuss and prepare its internal operating procedures and coordinate on related matters. During these meetings, CEIU also made presentations on AllB Integrity and provided updates to the Sanctions Panel on Integrity-related activities.
- 18. Significant Step Towards AIIB Joining the Cross-Debarment Agreement. CEIU made a presentation on AIIB Integrity to the Heads of Integrity (HOI) that are party to the Agreement for Mutual Enforcement of Debarment Decisions (AMEDD), or cross-debarment agreement (November 6, 2023). This is the first time that AIIB was invited to make a presentation to the AMEDD HOI and is a significant first step for AIIB to join the multilateral development banks (MDB) cross-debarment agreement as required under the PPP.

#### 2.5 Other Unit-Wide Activities

19. **CEIU** convened ten Practitioner Dialogues in 2023 on a variety of topics across all three functions. CEIU has convened Practitioner Dialogues since 2018, inviting specialists from CEIU peer departments within international institutions to discuss timely topics with selected AIIB staff. The details of the Practitioner Dialogues are listed in the subsequent chapters under each CEIU function.





20. CEIU provided inputs on a wide range of AIIB documents and activities. CEIU contributes an independent perspective to the review of draft AIIB documents relating to its three functions. This reflects its mandate to provide input on the review and formulation of policies and strategies, and its responsibility to remain engaged with, and contribute to, the rest of AIIB. In 2023, CEIU provided inputs to various documents including: the Accountability Framework; CEIU Terms of Reference; the Oversight Mechanism; the Board Efficiency and Governance Package; Sector Strategy Implementation Update; Directives for the Operational Policy on Financing and Environmental and Social Framework; Indicative Investment Pipeline; Gender Action Plan; Directive on the Operational Policy on International Relations; Climate-Focused Policy Based Financing concept paper; Governance Stock-Take in Preparation of the Accountability Framework Review; 2022 AIIB Sustainable Development Bonds Impact Report; Project Results Framework e-learning script; updated Nonsovereign-backed financing Project Document template; General Conditions for Sovereign-backed Loans; AIIB accreditation to the Green Climate Fund; an assessment by an Environmental, Social, and Governance (ESG) rating agency; Project Implementation and Monitoring Reports; and the President's speech at the 3rd Belt and Road Forum, among others.

- 21. **CEIU** provided orientation to new staff and specialized training courses to **Bank Personnel**. CEIU presented its role and functions during the Bank's semiannual two week-long induction sessions for new staff, including providing hard copy policy manuals for all three functions. CEIU also presented two rounds of entry-level and advanced training in the Bank-wide Operational Training Program (OTP). In 2023, new Bank staff completed CEIU's mandatory training courses on the PPP (151 completions) and PPM (97 completions).
- 22. **CEIU** actively participated in AIIB activities and initiatives, including an audit of the **Unit conducted by the Bank's Internal Audit Office**. CEIU staff also actively joined Bank trainings and are core members of AIIB committees/working groups such as the Board Efficiency and Governance Working Group, Internal Control over Financial Reporting Working Group, and Data Governance Working Group, among others. In 2023, CEIU was audited for the first time by the Internal Audit Office to assess the conformance of CEIU's resource management—namely staffing plan, budget, and procurement activities—with the Bank's relevant policies and procedures. The final report of the auditors is expected in Q1 2024.

#### 23. CEIU remained accessible on AIIB's public website and internal webpages.

CEIU maintained and updated information about its operations in a dedicated window on the AIIB public website. This provides a digital overview of CEIU and its structure, related policy documents, milestones, updates, and other activities. The website also contains quick links to file a submission under the PPM, report fraud and corruption in AIIB-funded projects and activities, and access a leaflet on OECD/DAC Evaluation Criteria in AIIB. CEIU also continued to maintain and update its internal pages for Bank Personnel to provide the latest information on its activities, news updates and information on its Practitioner Dialogues.





24. **Complaints-resolution**. The Project-affected People's Mechanism (PPM) is the independent accountability mechanism or complaints-handling mechanism established by AIIB, and implemented by CEIU pursuant to the Policy on the Project-affected People's Mechanism, to conduct an independent and impartial review of complaints from people, who believe they have been, or are likely to be, adversely affected by AIIB's failure to implement its Environmental and Social Policy.

25. In the first half of 2023, the Complaints-resolution function primarily focused on handling the submission related to the Bhola Independent Power Plant (IPP) in the Bangladesh. In the second half of the year, PPM started preparatory activities related to the PPM Review and completed the road map for this important exercise, which was endorsed by the Policy and Strategy Committee (PSC). In addition, the function also continued to conduct outreach activities for internal and external audiences. The specific activities completed in 2023 are enumerated below.

#### 3.1 Handling of Submissions

26. **Bhola IPP submission.** PPM closed the Bhola IPP submission that was found ineligible for Dispute Resolution. On February 28, 2023, PPM informed the Requestors of its determination through their authorized representatives. PPM also informed AllB Board and Management of its decision. PPM continued its engagement with civil society organizations (CSOs) representing the



CEIU Session on "Lessons learned on Bhola IPP Submission" (August 15, 2023)

Requestors of the Bhola IPP submission, held virtual meetings, responded to various queries, and provided clarification on PPM's decision. In addition, PPM finalized the "Lessons Learned on Bhola IPP Submission" and presented it to the PSC in June 2023. A session was organized with the operational staff to share these lessons on August 15, 2023.

27. The PPM Secretariat was also copied on complaints on a few projects addressed to Management and it liaised with Management toward grievance resolution at the level of the project Grievance Redress Mechanism. It should be noted that there are 21 complaints related to seven AllB-financed projects received by the Independent Accountability Mechanisms (IAMs) of cofinancier international fiancial institutions (IFIs) as of the end of 2023. PPM routinely follows up with the respective IAMs to get updates on these cases. For closed cases related to cofinanced projects, PPM also organizes sessions for AllB operational staff focused on the overall experience of case handling and lessons learned, together with the responsible IAM.

28. To strengthen transparency over which IAM applies in a cofinanced project, CEIU continued to update and publish a list of cofinanced projects that details the applicability of the respective Environmental and Social Policy and the IAM.

#### 3.2 Enhancing Engagement with CSOs

- 29. Workshop on PPM. During AllB's Annual Meeting in Sharm El Sheik, Egypt, in September 2023, CEIU organized a workshop on "Independent Accountability: Nuts and bolts of PPM". The two-hour workshop aimed to elaborate PPM functions; explain eligibility requirements for filing submissions and processes for handling submissions; clarify roles and responsibilities of various stakeholders; and understand challenges that CSOs and project-affected communities face in accessing PPM. Over 20 CSO representatives participated in the event.
- 30. **Survey on PPM's Visibility and Accessibility.** In September 2023, PPM conducted a survey for CSOs to understand how to improve PPM's visibility and accessibility to the CSOs, as well as communities affected by AllB-financed projects. A total of 43 respondents from CSOs around the world participated in the survey. Survey findings were shared with CSOs during the AllB Annual Meeting in Egypt. PPM identified key actions based on this survey and the workshop on PPM to improve visibility and accessibility.
- 31. **Annual CEIU-CSOs Forum.** Since 2017, CEIU has regularly convened a CEIU-CSO discussion forum at AllB's Annual Meeting. For 2023, the CEIU-CSOs Forum held a hybrid event on September 25 during the AllB Annual Meeting in Sharm El Sheikh, Egypt, with more than 70 participants in attendance. The Forum involved all three CEIU functions. CSOs from different parts of the world raised questions about a variety of topics, including the potential access barriers to the PPM, PPM Policy Review, individual cases, reports published by CSOs, and the broader functions of CEIU. CEIU was also an observer to the AllB Management-CSO Dialogue held on September 29, 2023 as part of the AllB Annual Meeting.
- 32. **Outreach Activities.** PPM led the organization of two Massive Open Online Seminars (MOOS) to spread awareness about IAMs. The first MOOS was held on July 25, 2023, and focused on the Asian region. It was co-organized with IAMs of the World Bank (WB), International Finance Corporation (IFC), Asian Development Bank (ADB) and United Nations Development Programme (UNDP). This was the first of its kind and participants appreciated the initiative and suggested that more such open events be organized. The second MOOS,





which was held on December 6, 2023, was co-organized with IAMs of WB, IFC, African Development Bank (AfDB), European Investment Bank (EIB), UNDP and the International Climate Initiative. Although it was an open outreach seminar, it focused on the Middle East and North Africa. A recording of the event can be found on the AllB YouTube Channel.

33. Other CSO Engagements. CEIU continued its engagements with CSOs, including through regular exchange of emails, zoom calls, participation in CSO-organized events and interaction during various events, including the AIIB Annual Meeting and the Independent Accountability Mechanisms Network (IAMnet) Annual Meeting.

#### 3.3 Engagement with Peer Organizations

34. **Engaging with Peer IAMs**. During 2023, CEIU continued its close collaboration and coordination with IAMs of peer institutions such as ADB, EIB, EBRD, IFC and WB. CEIU regularly organized meetings with peer IAMs aimed at improving mutual collaboration, especially on cases handled by the respective IAMs on cofinanced projects. The MD also held separate discussions with heads of IAMs of EIB and EBRD on improving mutual collaboration, especially on the ongoing IAM policy reviews in AIIB, EIB, EBRD, WB and ADB.

35. IAMnet. CEIU participated in the Annual Meeting of the IAMnet held in London from October 4-6, 2023. The meeting was hosted by the EBRD Independent Project Accountability Mechanism and WB Accountability Mechanism, which included a session for interaction with CSOs. In addition, CEIU regularly participated in the biweekly calls of the Outreach Working Group of IAMnet and meetings of the IAMNet Remedy Working Group and the Informal Group on Dispute Resolution.



At the 2023 IAMnet Annual Meeting: CEIU MD Marvin Taylor-Dormond and Senior PPM Specialist Shamas ur Rehman Toor represented AIIB (October 4-6, 2023)



At the 2023 IAMnet Annual Meeting in London, United Kingdom: CEIU MD Marvin Taylor-Dormond (first from L) spoke as a panelist in one of the sessions (October 4-6, 2023)



36. **Practitioner Dialogues**. CEIU delivered four Practitioner Dialogues on PPM-related matters in 2023 including: (i) "Handling Reprisals in the Latin American Context" in which speakers from the Independent Consultation and Investigation Mechanism (MICI) of the Inter-American Development Bank (IDB) provided insights about how IDB MICI handles issues related to reprisals. They also presented a case study of a project in Costa Rica; (ii) "Lessons Learned on Dispute Resolution Cases Handled by IFC/MIGA Compliance Advisor Ombudsman (CAO)". The CAO Head of Dispute Resolution presented lessons learned on cases involving dispute resolution, especially where IFC exited the project during the dispute resolution process; (iii) "Lessons Learned on the Uganda North Eastern Road-Corridor Asset Management Project Investigation by the Inspection Panel". The Chair of the WB Inspection Panel spoke about the investigation and lessons learned; and (iv) "Stories of People and Environment: How Development Can Be (and Should Be) a Win-Win". Vinod Thomas (formerly of ADB and WB) spoke about the importance of sustainable development and the role of development banks in driving the climate agenda.

37. **Accountability Alerts**. CEIU continued to issue "Accountability Alerts" to AllB staff. The series aims to provide Bank staff with synopses of cases (complaints) registered with the IAMs of peer multilateral development banks and to introduce relevant reports and knowledge products. This approach has helped increase awareness about the complexity and diversity of environmental and social issues related to complaints arising from development projects.

#### 3.5 Delivery of Specialized Training

38. CEIU delivered three in-person Operational Training Program (OTP) courses on PPM, including two OTP 101 courses on the Fundamentals of PPM (held on May 15 and September 12, 2023) and an OTP 201 course on "Myths and Misconceptions about the Project-Affected People's Mechanism" (held on May 25, 2023).







AllB operational staff attendees at the PPM Simulation Training (May 25, 2023)

#### 3.6 Updates to Project-affected People's Mechanism Online Presence

- 39. **Translations of PPM Policy**: CEIU translated the existing PPM Policy to improve access to it and make it easier for local CSOs and communities to provide comments on the policy for PPM Review. The PPM Policy is now available in 13 languages (Arabic, Bahasa Indonesia, Bangla, Chinese, English, French, Hindi, Kiswahili, Portuguese, Russian, Spanish, Turkish, Urdu) and can be found on the PPM Policy page.
- 40. **PPM Policy Review Page**: CEIU has established a webpage dedicated to the PPM Policy Review. This webpage serves as the primary information channel of the PPM Review. All details about the review process and major updates will be available on the webpage in a timely manner, including key documents, information materials and summaries of consultations. Key materials in translated versions will be made available as well.
- 41. **Digitalization of the PPM Online Submission Form**. CEIU launched the PPM Online Submission Form in December 2023. Using this form, Project-affected people can make a submission to PPM using their digital devices. PPM has also prepared QR Codes to access the form. To improve its visibility at the project-level, PPM will aim to make the QR Codes easily accessible to project-affected communities.
- 42. **PPM Frequently Asked Questions**: CEIU issued the detailed list of Frequently Asked Questions About PPM on its public page on the AIIB website.



www.aiib.org/ppm





43. **Learning and Evaluation.** CEIU selectively evaluates AllB's operations in accordance with the Bank's Learning and Evaluation Policy, including through Early Learning Assessments (ELA). It shares evaluative insights and lessons from peer institutions and project stakeholders. These activities aim to contribute to AllB's continuous improvement, and its corporate and learning culture.

44. In 2023, the Learning and Evaluation function primarily produced studies and papers at the Board's request to inform planned AllB policy updates (described below). In addition, the function continued to produce handy manuals and materials for staff training and arrange awareness-raising presentations. Also of note were AllB's acceptance as an International Institution Observer to the OECD/DAC Evaluation Network and the signing of a working level agreement between the independent evaluation functions of EBRD and AllB. The specific activities completed in 2023 are as follows:

## 4.1 Delivery of an Early Learning Assessment on Project-level Grievance Redress Mechanisms

45. A "First Stage ELA Desk Review on Project-level GRMs in AllB Operations" was circulated to relevant departments. Comments received were discussed through a series of meetings and an interdepartmental comments matrix. An updated paper was further discussed in a Management Meeting and the Policy and Strategy Committee (PSC). The ELA marks CEIU's first thematic study, serving both as a pilot and evidence of capacity to undertake such portfolio-level studies.

#### 4.2 Early Learning Assessment on Delegated Authority

46. CEIU undertook the preparation of a first Early Learning Assessment of an AIIB financing approved through delegation under the Accountability Framework in 2023. This report was completed and discussed by the PSC in Q1 2024 and helped provide insights toward the review of the AIIB Accountability Framework in 2024.

#### 4.3 Studies Initiated in 2023 for Completion in 2024

47. An Approach Paper was prepared and circulated within AIIB to initiate conduct of AIIB's first Project Learning Review for a completed stand-alone financing in 2024.

48. A concept paper was prepared to support the 2024 CEIU "Independent Review of AIIB's Delegated Project Approval Process", responding to the Accountability Framework approved in 2019. The concept paper will be presented to the PSC in June 2024.

49. CEIU submitted a short profile on AllB's independent learning and evaluation function within CEIU for inclusion in the OECD/DAC EvalNet Evaluation Systems Study: "Evaluation Systems in Development Co-operation & Humanitarian Assistance" which was published in 2024.

#### 4.4 Engagement with Peer Organizations

50. CEIU signed an "Agreement in Relation to Cooperation in Independent Evaluation Matters Between the European Bank for Reconstruction and Development and Asian Infrastructure Investment Bank" (December 1, 2023) and a similar agreement is in discussion with the Independent Evaluation Department of ADB.

51. CEIU participated in the 29th OECD/DAC Network of Development Evaluation (EvalNet) Meeting convened in Paris, France on February 22-23, 2023. This was the first EvalNet Meeting in which CEIU joined seven other MDBs as a fellow EvalNet International Institution Observer. CEIU was invited to speak in a session on "Building a Home for Learning and Evaluation at AIIB". CEIU also held side-meetings with participants from the independent evaluation functions of ADB, AfDB, EBRD, EIB, Inter-American Development Bank, WB, and German Institute for Development Evaluation.



At the 29th EvalNet Meeting in OECD Headquarters CEIU joined as an International Institution Observer (February 22-23, 2023)





52. CEIU participated with peer UN and MDB International Organization Observers and 30 bilateral agency evaluation departments in the 40th anniversary meeting of EvalNet in OECD Headquarters (November 15-16, 2023). The meeting discussed approaches to evaluation during crises; evaluation quality standards; unintended effects in projects; role of partner countries during evaluation; and use of artificial intelligence techniques. CEIU also joined the EvalNet Climate Crisis Working Group web meeting with EBRD, EIB, AfDB and European bilateral evaluation agencies to discuss how to: (a) develop a common understanding on evaluating climate adaptation and mitigation interventions; and (b) produce and communicate evidence for more effective operations and learning. Prior to EvalNet, CEIU joined a one-day OECD/DAC Community of Practice on Private Finance for Sustainable Development (November 13, 2023) and held side-meetings with independent evaluation departments of UNESCO and the Central European Bank (November 13-14, 2023) for familiarization, and the OECD Development Cooperation Directorate on further cooperation (November 17, 2023).

53. CEIU participated in the 2023 Asian Evaluation Week (AEW): "Beyond Recovery. Evaluation for Development Effectiveness" organized by ADB and Asia-Pacific Finance Development Institute, September 11-14, 2023, in Thailand. The Managing Director participated in a plenary "Evaluation Headlines" session and moderated three panels on "Learning in Action: Expanding the Evaluation Toolbox?"; "Use of Performance Evaluation Results in Public Sectors in China"; and "Boosting Young, Innovative Firms with Equity and Quasi-equity Support". The CEIU Senior Learning and Evaluation Specialist was a panelist in sessions on "Learning in Action: Expanding the Evaluation Toolbox?" and "Are MDBs ready to Promote Innovation for Sustainability and Private Sector Development?" This was the first AEW in which AllB designed and convened a panel on "Learning in Action: Expanding the Evaluation Toolbox?" co-hosted by AllB and the World Health Organization (WHO) with evaluator panelists from OECD/DAC EvalNet, EBRD, WHO and AllB to discuss approaches to early learning assessments.



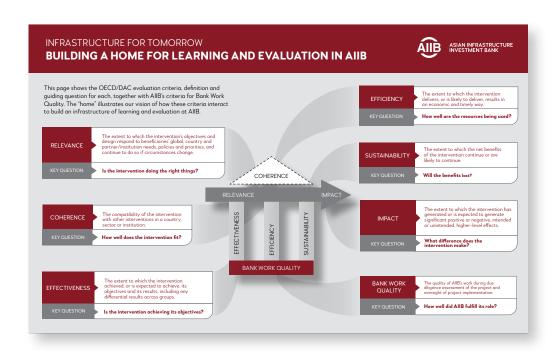


At the 2023 Asian Evaluation Week in Bangkok, Thailand CEIU Managing Director Marvin Taylor-Dormond (first from R) representing AllB in various panels (September 11-14, 2023)

#### 4.5 Conduct of Internal Awareness Raising Activities

54. **Practitioner Dialogues**. CEIU delivered four Practitioner Dialogues on Learning and Evaluation-related matters in 2023, namely: (i) "Early Findings on Blended Finance and Effects of Private Sector Engagement" by the German Institute for Development Evaluation; (ii) "Policy-based Lending Performance, Results and Design Issues" (June 23, 2023) by the ADB Independent Evaluation Department; (iii) "Evaluation of World Bank Group Support for Demand-Side Energy Efficiency" (June 28, 2023) by the WB Independent Evaluation Group; and (iv) "Bridging the Investment Gap with Blended Finance: An Overview of OECD Principles, Practice and Suggested Next Steps" (November 27) by the OECD Development Cooperation Directorate.

55. Learning and Evaluation Framework Awareness Raising. CEIU prepared and disseminated electronic and on-demand hard copies of: (i) a booklet called Learning and Evaluation Policy, Directive and LEF Guides as an easy access version of these documents for staff and clients; and (ii) a brochure on "Building a Home for Learning and Evaluation in AIIB" to familiarize readers with the OECD/DAC evaluation criteria included in AIIB's Learning and Evaluation Policy and to help foster a shared "language" on these criteria and their use within AIIB. Both documents were announced on the Bank electronic publicity screens with QR download codes. The hardcopy versions are AIIB's first Forest Stewardship Council 100% sustainable paper product, creating a replicable process for any similar future Bank printings. CEIU also designed and disseminated the "Building a Home for Learning and Evaluation in AIIB" e-leaflet. The booklet and brochure were given to AIIB operational staff (including new joiners) in Induction Training and Bank-wide Operational Training Program (OTP) sessions; and to interested peer IFIs and professionals at the 2023 28th OECD/DAC Evaluation Network Meeting, Asian Evaluation Week, AIIB Annual Meeting information booth, sessions with CSOs/NGOs, and the host country institution.







#### 4.6 Delivery of Specialized Training

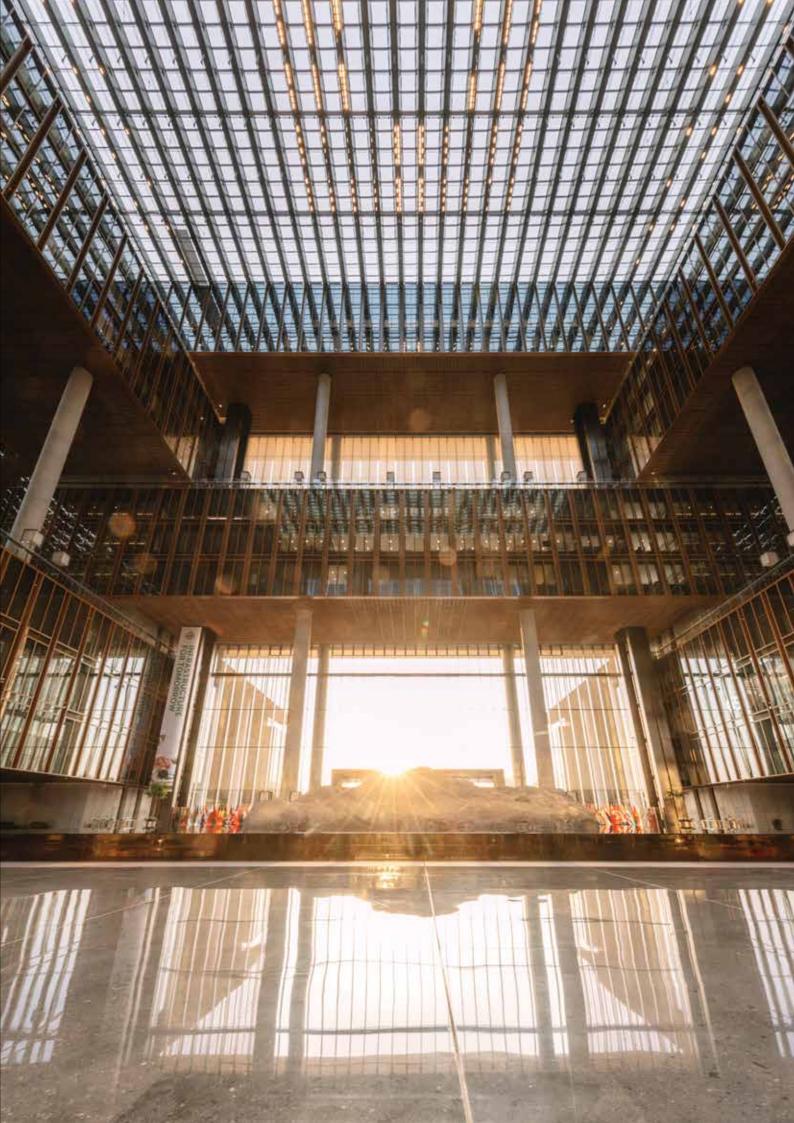
56. CEIU delivered three in-person OTP courses on Learning and Evaluation, including two OTP 101 courses on the *Learning and Evaluation Framework* (June 12 and September 27, 2023) and an OTP 201 course on *Evaluative Learning Tools: Early Learning Assessments and Project Learning Reviews* (May 26, 2023).

#### 4.7 Updates to Learning and Evaluation Online Presence

57. CEIU updated its Learning and Evaluation webpages on AIIB's website to include new awareness raising materials and relevant reports. CEIU also revised its internal web pages for Bank Personnel.



www.aiib.org/evaluation



58. **Integrity**. Under its Integrity function, CEIU conducts anti-fraud and anti-corruption work in accordance with AIIB's Policy on Prohibited Practices (PPP). This includes investigating allegations related to prohibited practices and raising awareness about risks and identification of fraud and corruption.

59. In 2023, the Integrity function primarily focused on ensuring that all allegations of prohibited practices were fully reviewed and investigated, as appropriate. In addition, the function also continued to provide technical advice on a wide variety of integrity, anti-corruption, and debarment-related matters. Also of note were internal and external awareness raising activities, participation in major anti-corruption events and meetings, continued collaboration with peer MDBs, taking steps towards joining the MDB cross-debarment agreement, and support for the operations of the Sanctions Panel. This section discusses the specific activities completed in 2023.

#### 5.1 Investigation into Prohibited Practices

60. In 2023, CEIU completed one investigation into an allegation of fraudulent practice in an AIIB-funded project. The investigation was closed as unsubstantiated. CEIU also issued a memorandum to the Audit and Risk Committee and to relevant AIIB units summarizing its investigative and operational findings.

61. CEIU received a total of 11 complaints in 2023 and reviewed an additional 30 complaints from previous years. As of December 31, 2023, there are seven complaints alleging prohibited practices which are under review at the intake phase.

#### 5.2 Review of Integrity-related Matters

62. As part of its advisory role, CEIU completed 116 engagements for review of integrity-related matters and/or compliance with the PPP, which included: (i) 40 engagements for review of project/financing/legal/ procurement documents; (ii) 54 engagements related to compliance of counterparties, and (iii) 22 engagements related to integrity matters in corporate-related activities.

#### 5.3 Updates to the Debarment List

63. CEIU continues to review and update AIIB's Debarment List on a regular basis, which includes debarments approved by AIIB's Sanctions Officer based on CEIU's investigation of cross-debarred entities under the Agreement for the Mutual Enforcement of Debarment Decisions (AMEDD). AIIB unilaterally recognizes the sanctions imposed by international organizations that are signatories to AMEDD as mandated for in para. 12.1 of the PPP. There are 992 entities on AIIB's Debarment List as of December 31, 2023.

#### 5.4 Supporting the Operations of the Sanctions Panel

64. AllB's PPP establishes a two-tier sanctions system that consists of the Sanctions Officer and the Sanctions Panel. The Sanctions Panel is responsible for reviewing appeals submitted by Respondents that have been sanctioned by AllB's Sanctions Officer. It is composed of an external chairperson, an external member, and an internal member, who are appointed by the AllB President. The Sanctions Panel is supported by a Sanctions Panel Secretary, who is also appointed by the AllB President.

65. In 2023, CEIU hosted two in-person meetings of the Sanctions Panel in AllB's Headquarters in Beijing on June 26-27 and December 10, 2023. The Sanctions Panel convened in person for the first time to discuss and prepare its internal operating procedures and coordinate on related matters. During these meetings, CEIU also made presentations on the AllB Integrity function and provided updates to the Sanctions Panel on integrity-related activities.



AllB President Jin Liqun (sixth from left) with the people who compose AllB's investigations and sanctions process (L to R): Andrew Mendoza (PPP Investigator, CEIU), Lena Bodner (Sanctions Panel Secretary), Rohil Hafeez (CEIU/Sanctions Panel Senior Consultant), Niki DeWitt (Internal Member, Sanctions Panel), Shoaib Suddle (External Member, Sanctions Panel), AllB President Jin Liqun, Enery Quinones (Chair of the Sanctions Panel), Marvin Taylor-Dormond (CEIU Managing Director), Ludger Schuknecht (Sanctions Officer), and Marilou dela Cruz (Office of the Sanctions Officer)



#### 5.5 Engagement with Peer Organizations

66. CEIU continued to engage with other peer organizations on integrity and anti-corruption matters in 2023:

a) CEIU attended the Heads of Integrity (HOI) Meeting on November 6, 2023 and delivered a presentation on AIIB's Integrity process to the MDBs that are party to the AMEDD or cross-debarment agreement. This is the first time that AIIB was invited to make a presentation to AMEDD HOI and is a significant first step for AIIB to join the MDB cross-debarment agreement.



At the MDB Heads of Integrity Meeting in London, United Kingdom: CEIU Managing Director Marvin Taylor-Dormond (L) and Andrew Mendoza (Senior Integrity Specialist) (November 6, 2023)

- b) CEIU attended the MDB HOI+ Meeting on November 7, 2023, and delivered a presentation on "AIIB's Use of a Single Approach instead of the Common Approach to Co-Financing". The MDB HOI+ is comprised of AMEDD HOI members and the Heads of Integrity of nine other IFIs.
- c) CEIU also met separately with the Heads of Integrity of ADB (August 7 and October 17, 2023), EIB (September 12, 2023) and WB (October 17, 2023) to discuss opportunities for collaboration on prevention, investigation, and debarment issues.



CEIU Managing Director Marvin Taylor-Dormond (fourth from L) and CEIU team members, along with the Heads of Integrity for the World Bank and Asian Development Bank, and team (October 17, 2023)

<sup>&</sup>lt;sup>1</sup> The AMEDD is comprised of the AfDB, ADB, EBRD, IDB, and WB.

d) On the sidelines of other integrity meetings/conferences, CEIU also met with representatives of other IFIs, United Nations agencies, and international organizations to discuss topics of mutual interest and continued cooperation.

67. CEIU also attended: (i) the Private Sector Integrity Meeting hosted by EIB and the Council of Europe Development Bank in Luxembourg on September13-15, 2023<sup>2</sup>; (ii) the 3rd Belt and Road Initiative Forum for International Cooperation in Beijing, China (October 18, 2023); and (iii) the Conference of International Investigators hosted by EBRD in London, United Kingdom (November 8-10, 2023).<sup>3</sup>



At the Private Sector Integrity Meeting at EIB Headquarters in Luxembourg Andrew Mendoza (Senior Integrity Specialist) representing AIIB (Sep. 13-15, 2023)



At the 3rd Belt and Road Initiative Forum for International Cooperation Marvin Taylor-Dormond (CEIU Managing Director, L) and Andrew Mendoza (Senior Integrity Specialist, R) in attendance. (Oct. 18, 2023)



CEIU attended the 2023 Conference of International Investigators hosted by EBRD in London, United Kingdom (Nov. 8-10, 2023)



The Private Sector Integrity Meeting convened IFIs that fund private sector projects to discuss issues, concerns and updates on integrity due diligence activities, sanctions/debarment, and other related matters.

Established in 1999, the Conference of International Investigators is a forum for investigators of international organizations to exchange ideas, discuss integrity issues, address challenges in fighting fraud, corruption, and other wrongdoing, receive new developments and share leading practices.



#### 5.6 Technical Presentation on Integrity and Anti-Corruption

68. CEIU was invited to share AllB's integrity and anti-corruption policy, procedures, and approaches as follows:

a) CEIU delivered a presentation to almost 200 representatives of Chinese contractors and state-owned enterprises at the "Asia-Pacific Anti-corruption and Integrity Forum" hosted by the Xiamen National Accounting Institute and ADB held in Xiamen, China, from August 28-31, 2023. The MD spoke as part of the panel on "Anticorruption and Integrity Policies in the Asia-Pacific Region" and CEIU Senior Integrity Specialist, Andrew Mendoza, presented AIIB's Anti-Corruption Agenda.





b) CEIU delivered a presentation on AllB's Prohibited Practices Policy and other integrity-related matters at the "Multilateral Cooperation for **Development Finance Workshop on** International Financial Institutions Practices and Standards on Anti-Corruption and Integrity" (November 27, 2023). The workshop, spearheaded by the Multilateral Cooperation for Development Finance (MCDF), with inputs from CEIU, WB and ADB, hosted 33 participants from 10 financial institutions, the China Banking Association, and others. It aimed to inform participants about current and emerging international standards and recognized good practices in anticorruption and integrity as applied by IFIs, and to support MCDF's objective to promote high-quality connectivity infrastructure.

CEIU Managing Director, Marvin Taylor-Dormond (top photo) and Senior Integrity Specialist Andrew Mendoza representing AllB at the Asia-Pacific Anti-corruption and Integrity Forum (August 26-28, 2023)





CEIU Managing Director, Marvin Taylor-Dormond and Senior Integrity Specialist Andrew Mendoza representing AIIB at the MCDF event (November 27, 2023)

#### 5.7 Conduct of Internal Awareness Raising Activities

69. **Practitioner Dialogues**. CEIU delivered two Practitioner Dialogues on Integrity in 2023 on a variety of topics including: (i) "Unique Integrity and Compliance Consideration When Working with State-Owned Enterprises" (July 4, 2023) by Jonathan Shapiro (Shapiro Advisors LLC) and Michael DeBernardis (Hughes, Hubbard, and Reed LLP); and (ii) "Anticorruption at the World Bank Group and Asian Development Bank" (October 17, 2023) by the Heads of Integrity of the World Bank and ADB.



CEIU staff meeting with Practitioner Dialogue Speakers at the AIIB Headquarters. (From L) CEIU Senior Integrity Specialist Andrew Mendoza, Michael DeBernardis (Hughes, Hubbard, and Reed LLP), Jonathan Shapiro (Shapiro Advisors LLC) and Managing Director Marvin Taylor-Dormond.





70. **Anti-Corruption Day Event.** CEIU spearheaded the annual celebration of International Anti-corruption Day at AIIB on December 9, 2023. The annual celebration was marked by a keynote panel event on December 11, 2023, which focused on the investigations, sanctions, and appeals structures and processes in AIIB. AIIB's Sanctions Panel, the Sanctions Officer and CEIU representatives participated in the Keynote Panel event as speakers. This event included over 300 in-person and virtual attendees comprising AIIB personnel and the Board. CEIU also conducted a range of awareness raising activities throughout the week designed to draw attention to AIIB's anti-corruption efforts.



The 2023 International Anti-Corruption Day Keynote Panel Event with the CEIU Managing Director Marvin Taylor-Dormond (first from L), Sanctions Panel Chair Enery Quinones (second from L), AllB Sanctions Officer Ludger Schuknecht (third from L), External Member of the Sanctions Panel Shoaib Suddle (fourth from L), Internal Member of the Sanctions Panel Nicolette De Witt (fifth from L), and CEIU Senior Integrity Specialist Andrew Mendoza (R) (December 11, 2023)

71. **Integrity Matters.** CEIU continued to send out "Integrity Matters" e-bulletins to Bank staff throughout the year to raise awareness on integrity issues relevant to AIIB's operations and to offer suggestions on ways to promote integrity in projects. Through these e-bulletins, CEIU also announces updates to AIIB's Debarment List on a regular basis.

#### 5.8 Delivery of Specialized Training

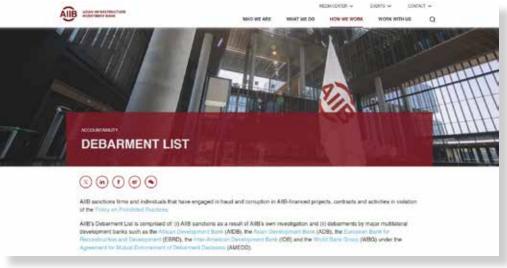
72. CEIU delivered three in-person Operational Training Program (OTPs) courses on integrity and anti-corruption topics, including two OTP 101 courses on "AllB's Policy on Prohibited Practices" (May 18 and September 7, 2023) and an OTP 201 course on "Procurement Red Flags (Sovereign-Backed Financing) and Integrity Due Diligence (Nonsovereign-backed Financing)." (May 23, 2023).

#### 5.9 Updates to Integrity Online Presence

73. CEIU updated its Integrity-related and debarment webpages on AIIB's website to include all relevant information on the PPP and changes to the Debarment List. CEIU also revised its internal Integrity pages for Bank personnel.



www.aiib.org/integrity



www.aiib.org/debarment







2023

# ANNUAL ACTIVITY REPORT

#### Complaints-resolution, Evaluation and Integrity Unit

The Complaints-resolution, Evaluation, and Integrity Unit (CEIU) of the Asian Infrastructure Investment Bank (AIIB) is transforming to better support AIIB's mission. Adopting the Delivery, Efficiency, Effectiveness, and People (DEEP) approach, CEIU has launched a strategic five-year plan to refine its focus and enhance oversight. This 2023 Annual Activity Report showcases CEIU's key achievements and activities, setting a foundation for its next phase in promoting integrity, accountability, and transparent governance in AIIB's future infrastructure projects.

