

**COMPLAINTS-RESOLUTION, EVALUATION AND INTEGRITY UNIT (CEIU)
2022 ANNUAL ACTIVITY REVIEW**

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Abbreviations

ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank
AML/CFT	Anti-Money Laundering/Combating the Financing of Terrorism
ARC	Audit and Risk Committee of the Board
BPB	AIIB Annual Business Plan and Budget
BHRC	Budget and Human Resources Committee of the Board
CAO	Compliance Advisor Ombudsman of IFC/MIGA
CHINCA	China International Contractors Association
CEIU	Complaints-resolution, Evaluation and Integrity Unit
CSO	Civil society organizations (including NGOs)
DPPA	Department of Political and Peacebuilding Affairs
EBRD	European Bank for Reconstruction and Development
ECG	Evaluation Coordination Group
EIB	European Investment Bank
ELA	Early Learning Assessment
ESF	AIIB Environmental and Social Framework
EvalNet	OECD/DAC Evaluation Network
FSC	Forest Stewardship Council
GRM	Grievance Redress Mechanism
IAM	Independent accountability mechanism
IAMnet	Independent Accountability Mechanisms Network
IDB	Inter-American Development Bank
IFAD	International Fund for Agricultural Development
IFC	International Finance Corporation
IFI	International Financial Institution
KYC	Know Your Client
LUMS	Lahore University of Management Sciences
MCDF	Multilateral Cooperation Center for Development Finance
MDB	Multilateral Development Bank
MD-CEIU	Managing Director, CEIU
MFD	Mobilizing Finance for Development
MICI	Independent Consultation and Investigation Mechanism of IDB
NDB	New Development Bank
NGO	Nongovernmental Organizations
OECD/DAC	Development Assistance Committee of the Organisation for Economic Co-operation and Development
OHCHR	UN Office of the High Commissioner for Human Rights
OTP	Operational Training Program
PIMR	Project Implementation Monitoring Reports
PLR	Project Learning Review
Policy on the PPM	Refers to AIIB's Policy on the Project-affected People's Mechanism

PPM	Project-affected People's Mechanism
PPP	Policy on Prohibited Practices
Project-affected People	Refers to people who may be beneficially or adversely affected by an AIIB-financed Project
PSC	Policy and Strategy Committee of the Board
RBL	Results-based Lending
UNDP	United Nations Development Program
UNEG	UN Evaluation Group

Note:

Unless otherwise indicated, all Annual Activity Review images were produced by CEIU staff.

1. Message from the Dean of the Board of AIIB

It is my pleasure to welcome CEIU's Annual Activity Review 2022. As CEIU is part of the Board's [Oversight Mechanism](#) and a Board-reporting unit, both independent from and engaged with AIIB Management, we follow CEIU's activities very closely. CEIU updates the Board on a quarterly basis on the progress of its annual work plan, tasks and other relevant matters. As the Bank keeps growing, so does CEIU's work and responsibilities. With more standalone projects approved by the Bank, the role of CEIU is becoming even more important.

2022 was a difficult and challenging year, with much of the world still recovering from the COVID-19 pandemic, a looming debt crisis in some developing countries, climate-related and other environmental disasters, and geopolitical tensions. All of these have disastrous humanitarian consequences and knock-on effects in a highly globalized world, including rising food and energy prices and costs of reconstruction after climate disasters. Going forward, many developing countries will need to make major investments to rebuild infrastructure and economies.

Awareness-raising. We acknowledge the **outreach activities** CEIU has done, including those in coordination with other MDBs. Our clients are our *raison d'être* and civil society plays a vital role in holding AIIB to account, pointing to issues where they arise and helping the Bank improve its processes. We, therefore, encourage CEIU to continue organizing outreach with clients and civil society across all members. Likewise, we encourage clients and civil society to take advantage of these outreach sessions and follow up on any open questions that remain. Similarly, the Board values CEIU **inreach activities** to strengthen Bank staff awareness through training and activities, including those marking International Anti-corruption Day, and the provision of reference tools, such as AIIB's Debarment List. Inreach activities such as Accountability Alerts play an important role in raising staff awareness about environmental and social issues on projects through cases registered with independent accountability mechanisms of fellow MDBs.

Insight. CEIU provides the Board and Bank staff with valuable lessons from its activities and those of peer MDBs. The Board appreciates the Early Learning Assessments (ELA) that CEIU conducts annually to yield insight and lessons from on-going Bank financings. Similarly, Practitioner Dialogues convened by all three CEIU functions provide Board Members and staff with insights into key topics of concern. Lessons databases, periodic briefs and alerts also support project preparation and management. We expect and encourage the Bank will draw lessons from these insights and to consider them in the design and implementation of its operations.

International presence. We are also pleased that CEIU has continued to enhance its involvement with peer institutions, events and activities, including through in-person participation in annual meetings of the Independent Accountability Mechanisms Network (IAMnet) and MDB Heads of Integrity meetings. We welcome AIIB's inclusion as an official International Organization Observer in the OECD Development Assistance Committee Evaluation Network, active role on various working groups the IAMnet (e.g., Retaliation Working Group; Remedy Working Group, Outreach Working Group) and the MDB Working Group on Outcome Orientation and Independent Evaluation. We encourage CEIU to continue

increasing its engagement with these international organizations to share its experience and derive lessons for continuous improvement at AIIB.

We are glad that CEIU is in a good position to strengthen the Bank's governance and accountability, with all policies and directives now operational. The vital task remains to mainstream these policies and directives and keep them current and relevant to the needs of a growing institution that is transitioning from its start-up phase. The Early Learning Assessments, external outreach and inreach work, as well as Practitioner Dialogues are already good steps in that direction. With the easing of travel restrictions due to the COVID-19 pandemic, we especially expect that there will be more CEIU outreach and other activities on the ground and more travel by staff to be able to implement CEIU's mission and contribute to continuous improvement in AIIB's operations and work quality.

Dean of the Board of Directors
Asian Infrastructure Investment Bank

2. Message from the President of AIIB

It is with pleasure that I welcome the second Annual Activity Review of the Asian Infrastructure Investment Bank's (AIIB) Complaints, Evaluation and Integrity Unit (CEIU).

As AIIB enters its seventh year, we have matured from our start-up phase into our growth phase. We are engaging in more financing, across more geographies, and more types of funding structures and mechanisms. This is indeed a cause for celebration. However, to maintain the continuous improvement required by our Corporate Strategy, we also need to be an institution whose activities remain clean, carefully designed, and effective for our clients and the communities we serve.

To this end, I am pleased that CEIU has continued to bring its independent perspective to Bank activities in 2022. The CEIU achievements over the course of last year cover several themes:

- **More outreach to Bank stakeholders** to raise awareness about AIIB's Policy on Project-affected People, particularly with clients and civil society organizations. Well-attended meetings were convened in Nepal, Pakistan and in Lebanon, covering North Africa and the Middle East.
- **More inreach to Bank staff** to share findings and insights from peer organization assessments and AIIB's own financings across all three CEIU functions. I particularly note the importance of Practitioner Dialogues presented by CEIU counterparts in other MDBs. These are important for our young Bank. Topics included handling cases brought by Project-affected People, as well as evaluations of climate change, renewable energy, energy policy, private-sector capital mobilization and results-based lending. AIIB's 2022 annual Anti-Corruption Day keynote speech covered examples of "lawful but awful" activities and institutional corruption that will help us to bring more thought to our clean values and improve our operations. Similarly, new

Early Learning Assessments were made of two ongoing Bank projects, with different focuses to derive insights of wider benefits for Bank consideration, namely, large infrastructure and financial intermediation. These reports were shared with Board members and Bank staff to enhance learning and Bank practice.

- **More networking with peer international financial institutions** by all three CEIU functions in meetings and conferences. Of particular note was AIIB's acceptance as an International Institution Observer of the OECD/DAC Network on Development Evaluation (EvalNet), allowing AIIB to benefit from the experience of our peer evaluation institutions going forward.

I congratulate CEIU on its work and achievements in 2022 and look forward to more in-field and in-person activities in 2023 as business travel resumes in a world recovering from COVID-19. CEIU's important contributions to effective oversight, and through it to the quality of AIIB's operations, are all welcome.

Jin Liqun
President and Chair of the Board of Directors
Asian Infrastructure Investment Bank

3. Message from the Managing Director, CEIU

For a second year in a row, my CEIU colleagues and I are very pleased to share this annual activity review which covers CEIU's activities in 2022. CEIU started the practice of publishing the Annual Activity Review last year to inform relevant stakeholders and the public at large about CEIU's work and the important developments in fields where CEIU is active.

As an independent Board-reporting unit that also engages with Management, CEIU is tasked with strengthening and sustaining AIIB's Oversight Mechanism and ensuring that these principles are adhered to in daily operations. CEIU also supports and strengthens AIIB governance and capacity to manage risks; raises staff, management, and Board awareness on emerging issues and opportunities; and shares experiences and good practices from other international financial institutions.

The last year marked a number of significant developments for CEIU. PPM received its second (an earlier complaint received in 2019 was ineligible as it did not relate to a project proposed to be financed by the Bank) which is a demonstration that Project-affected People are becoming more aware of CEIU's role and the mechanisms available to report any concerns or complaints. External outreach continues to be a key instrument to disseminate information about how the PPM can be accessed by Project-affected People. Clients and civil society play an important role in this and we are happy to have organized outreach events together with other MDBs in Pakistan, Nepal and Lebanon during 2022. Of course, external outreach is matched with inreach to educate our own staff about the PPM. To that end, an e-learning course to raise staff awareness was also developed and rolled out this year.

Another significant development was AIIB's acceptance as an International Organization Observer to the OECD/Development Assistance Committee Network on Development Evaluation. For us, working together with other MDBs is an important learning experience, and we take pride in being a member of this network. As CEIU completed its ninth Early Learning Assessment in 2022, the opportunities for exchange of experience with peer institutions continues to grow. Some higher-level lessons from the two ELAs completed during the year are again presented in this review.

We also had discussions, both within the Bank and with other MDBs and stakeholders, about quality of results frameworks, project implementation monitoring, integrity checking and the functionality of project-level grievance redressal mechanisms (GRMs). It is important that clients, communities and Project-affected People know that these systems exist and are easily accessible. It is also worth highlighting that according to AIIB's Environmental and Social Framework (ESF) our clients are required to disclose in a timely manner the project's environmental and social information and establish project-level GRMs, which can be readily accessed by the Project-affected People. Through PPM outreach and inreach events, and our Early Learning Assessments, we continue to emphasize the importance of GRMs so that issues are settled at the level best suited to solve them. These activities have contributed to Management incorporation of a section on GRMs in its quarterly Project Implementation and Monitoring Reports (PIMRs). In addition, CSOs continue to copy the Board and PPM on significant complaints.

Enhancing Bank operations through lessons from ongoing operations, taking informed and timely actions, and showing flexibility while complying with the environmental and social policy and ensuring integrity in Bank operations are all key in a time of crisis. AIIB has learned valuable lessons from its crisis response, and we believe that AIIB along with its peer MDBs, and with its lean and agile model, is well positioned as a twenty-first century bank. In the spirit of multilateralism and partnerships enshrined in its Articles of Agreement, it can make an important contribution to tackling the entwined global challenges of healthy recovery from COVID-19, economic instability resulting from the pandemic and conflict, and climate change.

Hamid Sharif
Managing Director, CEIU
Asian Infrastructure Investment Bank

4. INTRODUCTION

The Role of CEIU

The Complaints-resolution, Evaluation and Integrity Unit ([CEIU](#)) was established in 2016 as an independent unit within the Asian Infrastructure Investment Bank (AIIB). It forms part of the Bank's [Oversight Mechanism](#) created by its [Board of Directors](#) (Board) under Article 26(iv) of the AIIB [Articles of Agreement](#). CEIU is led by a [Managing Director](#) who reports directly to the [Board](#) every quarter.

The primary responsibilities of CEIU are described in a Board-approved [Terms of Reference](#), which includes three functions:

Complaints-resolution. The [Project-affected People's Mechanism](#) (PPM) is the independent accountability mechanism or complaint-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 Project-affected people, who believe they have been or are likely to be adversely affected by AIIB's failure to implement its [Environmental and Social Policy](#).

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

Integrity. Under its integrity function, CEIU conducts anti-fraud and 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.

CEIU can also be invited to provide independent input and insights during the review of policies and strategies by Bank Management – one recent example is the update of Energy Strategy that took place in 2022 and CEIU provided substantial comments during several rounds of review. The Managing Director, CEIU is also an observer in Management meetings and meetings of the Executive Committee.

CEIU Annual Reporting on Its Activities

The Board supervises the Bank through Board meetings and activities, including the review and approval of the AIIB annual Business Plan and Budget (BPB). The CEIU Annual Workplan is presented to the Board as a separate appendix to the BPB and CEIU's budget items are separately listed in the BPB.

Management and CEIU separately prepare and present quarterly reports to the Board on the status of its workplan implementation and also respond to pre-Board questions. This gives the Board visibility over and ownership of key developments across the Bank.

Three [Board committees](#) 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 observes meetings of the Board and each of its three committees. CEIU also presents findings and insights from its three functions to the relevant committees of the Board. Matters relating to CEIU's complaints-resolution and learning and evaluation functions are considered by the PSC. Reports on any investigations under CEIU's integrity function are reported to the ARC.

CEIU during COVID-19 Response and Recovery

2022 Workplan. The pandemic and crisis recovery were also key topics in 2022, with the following activities undertaken by CEIU:

- Outreach calls and Practitioner Dialogues with peer institutions and stakeholder groups to understand their pandemic and crisis recovery responses, including opportunities for collaboration or information sharing.
- Continued participation in virtual meetings and presentations of the COVID-19 Global Evaluation Coalition, of which AIIB is a Member, to discuss institutional evaluations of COVID-19 response and recovery. These included presentations by the UN Development System¹, OECD/DAC, European Commission, USAID and government agencies in Finland and Luxemburg. Topics covered evaluation approaches, rapid assessment techniques, data availability, and study findings and recommendations.
- Organization of virtual outreach events with civil society organizations (CSOs), including nongovernment organizations (NGOs), in Nepal and Pakistan.
- Increasing integrity vigilance and outreach, including through delivery of PPP training, the rollout of a new PPM e-learning course and issue of advisories to staff.
- Convening a Practitioner Dialogue on Corruption and COVID-19: Challenges in Crisis Response and Recovery.

CEIU Staffing in 2022. As during COVID-19 in 2021, CEIU's staff continued to work from AIIB headquarters or remotely in 2022. One change of staff was registered in 2022, with a new head of integrity taking over (Section 5 below).

CEIU continued to employ a mixture of technical staff and task-specific consultants in all three of its functions. Ample funds for these consultants were budgeted and approved for this purpose in 2022. The core staff-consultant model has proved appropriate for the size of the Bank's portfolio at this stage and is consistent with the Bank's lean values. It has also worked well during COVID-19 and is anticipated to continue in 2023. As part of a Bank-wide internship scheme, CEIU also supplemented this staffing model with a short-term summer Intern in 2022. The successful candidate supported computing tasks and development of tools across all three CEIU functions. This process also enabled CEIU to familiarize an early-career female researcher with its work and Bank practice.

¹ cf. [Evaluation of WFP's Response to the COVID-19 Pandemic](#) and [Monitoring and evaluation framework for the COVID-19 response in the WHO African Region](#)

5. ENHANCING THE CEIU POLICY AND INSTITUTIONAL FRAMEWORK

Launching a Learning Culture Leading Group

The [Directive](#) to the Learning and Evaluation Policy calls for establishment of a Bank-wide Learning Culture Leading Group by the President to be chaired by the Vice-President, Policy and Strategy (VP PS). The aim is to facilitate Management’s implementation of its responsibility for learning aspects of the Policy. CEIU is also closely involved in the process of operationalizing this group, drafting think-pieces and partnering in discussions.

Access to Independent Accountability Mechanisms (IAMs) under Cofinanced Projects

Cofinanced projects remain a significant portion of the AIIB portfolio.² Under the [COVID-19 Crisis Recovery Facility](#), cofinancing with the Asian Development Bank (ADB) and the World Bank allows AIIB to use special lending instruments for policy- and results-based lending.

The Policy on the PPM allows AIIB to agree with a cofinancier to rely on the cofinancier’s independent accountability mechanism (IAM) when the cofinancier’s environmental and social policies (ESP) apply to the project.³ Being able to rely on a single IAM in cofinanced operations is a novel and innovative feature of the Bank and for IAMs in general. Both clients and Project-affected People benefit from having to deal with only one financier’s environmental and social policies and procedures and only one IAM instead of interacting with each cofinancier’s ESP and IAM. Currently, AIIB has co-financing framework agreements with ADB, EBRD and the World Bank based on which AIIB relies on the IAM of the lead co-financier when their ESP is applicable.

An issue raised by CSOs was that it was not always clear which of the respective IAMs of the co-financing MDBs was applicable, especially for projects approved before approval of the PPM Policy. As a response to this, CEIU has developed and released a [list of co-financed projects](#) in collaboration with relevant departments in the Bank, showing the applicable ESP and IAM for each of the co-financed projects. The list is updated every six months.

Coordinating Approaches. When complaints are handled by a cofinancier, the PPM cooperates closely with the other IAM. These arrangements are financier-specific and revised

Quick Links

- [Terms of Reference–CEIU](#)
- [Environmental and Social Framework](#)
- [Paper on the Oversight Mechanism](#)
- [Policy on Public Information](#)
- [PPM Brochure](#)
- [Approved Projects](#)
- [Proposed Projects](#)
- [Report Fraud and Corruption](#)
- [Request for Information](#)

[AIIB Co-Financed Projects with applicable Environmental and Social \(E&S\) Policy and Independent Accountability Mechanism \(IAM\)](#)

² As of December 31, 2022, 94 (USD19.457.40 million) out of a total of 202 (USD38,808.19 million) projects approved since Bank inception are cofinanced.

³ Policy on the PPM, Section 5.1: “5.1. A submission shall be ineligible to be considered by the PPM, if: ...5.1.6. The Project is co-financed with another multilateral development bank (MDB) or bilateral development organization and AIIB has agreed to the application of the environmental and social policies and procedures and to rely on the Independent Accountability Mechanism (IAM) of such institution;”

accordingly.⁴ The PPM Secretariat actively engaged with the IAMs of cofinanciers handling complaints alleging non-compliance with the applicable ESP. The PPM Secretariat closely worked with the IAM concerned to confirm that complaints are both handled efficiently and consistently, while guaranteeing recourse for Project-affected People to the IAM that is in the best position to handle the complaint. The PPM also organized periodic calls with relevant IAMs that handled cases on co-financed projects to discuss updates and lessons learned.

A Pilot Approach for Project Learning Reviews

Project Learning Reviews (PLR) are independent post-evaluations of AIIB's stand-alone financings. These are undertaken in accordance with the Learning and Evaluation Policy at an appropriate point after Management has finalized a Project Completion Note and circulated it to the Board. CEIU drafted an approach for conducting a PLR. This will be piloted in CEIU's first PLR in 2023 and further refined through the experience gained.

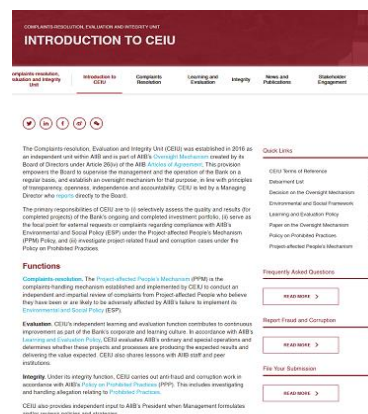
Appointment of a new Head of Integrity

Staff Changes. The new head of integrity at CEIU is Andrew Mendoza, who joined AIIB from International Fund for Agricultural Development (IFAD) headquarters where he also worked on integrity matters. Andrew Mendoza is already familiar with AIIB, CEIU and the [Policy on Prohibited Practices](#). Before joining IFAD, he had earlier worked on integrity and anti-corruption at CEIU, and at the World Bank's Integrity Vice Presidency. The head of integrity is in charge of anti-fraud and corruption work in accordance with AIIB's PPP. This includes investigating and handling allegations relating to [Prohibited Practices](#).

CEIU's Online Presence

Public Website. 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 evaluation-related Practitioner Dialogues. Quick links also help users send [requests to the PPM](#) or [report integrity matters](#) covered by AIIB's PPP. A PPM FAQ section was also uploaded on the AIIB intranet in 2022 for staff reference.

AIIB intranet. CEIU also added information on Connectivity, the AIIB intranet for Bank staff. This included new Practitioner Dialogue materials and completed ELA reports and a range of information and learning tools described in Section 6).



⁴ Policy on the PPM, Section 10.1: "In cases where the Project is co-financed with another MDB or bilateral development organization and AIIB has agreed to apply the environmental and social policies and procedures of such institution and to rely on the co-financier's IAM to handle submissions from Project-affected people under the Project, the PPM shall coordinate closely with the co-financier's IAM on the handling of the submissions and report to the Board of Directors on the outcome of the review by the co-financier's IAM of these submissions."

6. HELPING BUILD BANK CAPACITY

Strengthening staff capacity and promoting a culture of integrity and learning continues to be important. Several activities were carried out to this end.

Training and Learning Resources

Staff Training. CEIU presented on its role and functions during the Bank's semiannual, two week-long induction sessions for new staff and conducted specialized training in September 2022 for investment and operational staff that participated in the beginner and intermediate Operational Training Program (OTP). The advanced training sessions in September 2022 were targeted at investment and operational staff that participated in the beginner and intermediate OTP in May 2022.

On April 7, 2022, CEIU also organized a conversation between staff and the MD-CEIU on "Debunking common misconceptions about Project-affected People's Mechanism (PPM)". Staff from across the Bank participated in this interactive session which helped debunk several misperceptions about PPM. CEIU staff also participated and gave an overview of key CEIU functions at the April 11 New Staff Induction.

e-Learning. The PPM e-learning course for AIIB staff was finalized and rolled out in 2022. The e-learning course serves to raise awareness among staff about the role of the PPM and how it can be accessed by Project-affected People. The course is mandatory for the operational staff and has seen a healthy uptake since its launch.

Accountability Alerts. CEIU issued its first issue of an Accountability Alerts series on Jan. 18, 2022. The series aims to provide Bank staff with synopses of cases (complaints) registered with the IAMs of peer MDBs. This approach can increase awareness of the diversity of Environmental and Social issues related to which complaints arise on projects financed by MDBs. Three Accountability Alerts were issues in 2022.

IAMs Case Dashboard. With the help of a summer intern, CEIU completed the work on an IAMs Case Dashboard which aims at providing AIIB staff with a quick overview of complaints/cases that are handled by independent accountability mechanisms (IAMs) of other multilateral development banks (MDBs). Where possible, we have attempted to extract the lessons learned, recommendations, and insights from publicly available reports on these cases. At this stage, the IAM Case Dashboard covers cases from IAMs of the ADB, EBRD, EIB, IFC & MIGA and World Bank. CEIU will update Dashboard on a periodic basis and conduct inreach sessions with AIIB staff to help them get familiar with it.

Lessons website. CEIU professional staff worked with the CEIU summer intern and explored a sustainable and fit-for-purpose approach to sharing lessons from peer institution evaluations with Bank staff. This considered the time availability of CEIU staff and need to present evaluation lessons in context. A webpage with descriptions and links to four key digital databases of completed evaluations/validations maintained by MDBs, the United Nations, bilateral and other international financial institutions was subsequently prepared, pre-tested and launched on the AIIB intranet.

Learning and Evaluation Booklet. CEIU worked with Bank departments and a [Forest Stewardship Council \(FSC\) certified company](#) in Beijing to prepare a booklet of the Learning and Evaluation Policy, Directive and Guides in hard-copy and electronic form. The hard-copy version will be AIB's first FSC-certified publication, exemplifying both the Bank's core green value and a replicable process for any similar AIB hard-copy publications in future. Both electronic and hard-copy booklets will be finalized and released following incorporation and approval of language from the updated Operational Financing Policy.

Sharing Experience and Lessons: Practitioner Dialogues

CEIU has convened Practitioner Dialogues since 2018, inviting specialists from CEIU peer departments within international institutions to discuss timely topics with selected Bank staff. These hour-long, virtual sessions have proved convenient both for international speakers and busy Bank staff. Moreover, the "narrow-cast" format helps to stimulate frank, useful and focused exchanges on difficult challenges.



CEIU convened 12 Practitioner Dialogues in 2022 on a variety of topics, spanning all three CEIU functions:

- **Compliance Advisor Ombudsman (CAO) of IFC and Independent Consultation and Investigation Mechanism (MICI) on Responsible Exit: What should MDBs do to address negative impacts of projects on communities before divesting.** The objective of this session was to share the concept of 'Responsible Exit' and discuss the best practices that MDBs should follow before divesting from a project. CEIU invited representatives from CAO (IFC) and MICI (IDB) to share lessons and experiences based on selected case studies.
- **Office of the High Commissioner for Human Rights on Remedy in Development Finance.** In this session, the OHCHR report *Remedy in Development Finance* was presented to invited AIB staff. The report is the result of two years of research and consultations with development finance institutions, independent accountability mechanism, and civil society organizations across the globe.
- **European Investment Bank (EIB) on E&S Issues in the Nenskra HPP Project.** Cases handled by IAMs of project financiers: selected AIB staff were invited to this session, where accountability experts from the ADB Accountability Mechanism (ADB AM) and EIB Complaints Mechanism (EIB CM) discussed insights and lessons learnt from E&S related complaints they handled on the Nenskra Hydropower Project.

- **EIB fraud detection tools.** Proactive detection is key to addressing fraud and corruption issues that might otherwise remain undetected. In this session, EIB staff from EIB's Fraud Investigations Division, spoke on how EIB has leveraged on innovative technologies and big data to develop its own state-of-the-art fraud detection tools.
- **UN Global Task Force on Corruption: Corruption and COVID-19.** Challenges in Crisis Response and Recovery: staff from UNODC spoke on how the COVID-19 pandemic has impacted the prevention and detection of corruption, as well as crisis response and recovery. The UN Global Task Force on Corruption is under the co-leadership of UNODC, the United Nations Department of Political and Peacebuilding Affairs (DPPA) and the United Nations Development Programme (UNDP). The Task Force developed a UN System-Wide Policy Paper ([Corruption and COVID-19: Challenges in Crisis Response and Recovery](#)) which elaborates a range of potential policy responses and concrete actions Member States may take immediately and over the medium and long term to better recover and respond to COVID-19 and future emergencies, including various considerations in the prevention of corruption.
- **World Bank Group Independent Evaluation Group: Evaluating Private Capital Mobilization for the SDGs.** Staff from the World Bank's Independent Evaluation Group discussed insights from its [first systematic assessment of WBG approaches to private capital mobilization \(PCM\)](#). PCM has become a WBG-wide effort under the Mobilizing Finance for Development (MFD) strategy and a Cascade approach. The World Bank official corporate target for PCM is 25 percent for IBRD on average over the period FY19–30 (due to significant year-to-year fluctuation). Recommendations included to expand PCM platforms, guarantees, and disaster risk management products commensurate with project pipeline development and develop new PCM products and improve product alignment with the needs of new investor groups and partners.
- **Asian Development Bank: Independent Evaluation of ADB Support for Results-Based Lending.** Results-based lending (RBL) was adopted as a financing instrument by the Asian Development Bank (ADB) in 2013 with a 6-year pilot phase (June 2013–June 2019). This decision responded to increasing demand from governments and development partners to support their key expenditure and development programs. ADB's evaluation, which was presented during this session by staff from ADB's Independent Evaluation Department, assessed ADB's experience in piloting 12 RBLs in nine countries (Armenia, China, India, Indonesia, Nepal, Pakistan, Philippines, Solomon Islands and Sri Lanka) to identify key issues, lessons and recommendations for improved operations.

To support preparation of the 2022 AIIB Energy Strategy Update, CEIU also convened five Practitioner Dialogues with peer MDB independent evaluation functions to discuss relevant energy and climate change evaluations with invited Bank staff:

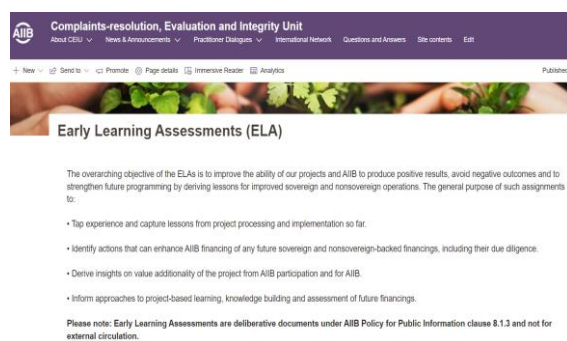
- **Evaluation of the EBRD Energy Strategy.** Staff from EBRD's Evaluation Department discussed insights and updates from a [Review of the EBRD Energy](#)

[Sector Strategy](#) undertaken in 2018. The Review of the EBRD Energy Strategy was undertaken by EBRD Evaluation Department in 2018 to inform development of a new sector strategic document to replace EBRD's 2013 Energy Sector Strategy (ESS).

- **Thematic Evaluation: ADB Support for Action on Climate Change, 2011–2020:** ADB strategic support for climate change financing strengthened during 2011-2020, with (a) commitment to, and doubling of, climate financing to \$6 billion from 2015-2020, (b) creation of a Climate Change and Disaster Risk Management Unit, a Bank-wide thematic group and climate risk management framework, and (c) commitment to a timeline for full alignment of operations with the Paris Agreement (here). ADB's evaluation covered 688 climate financings (\$40.2 billion) approved 2011–2020, with mitigation forming 78% of the total (adaptation 22%) and nonsovereign climate-tagged projects 21%. The bulk of climate financing went to south Asia (39%). India was the largest country recipient, followed by China. The [Evaluation](#) was published in September 2021.
- **EBRD Cluster Evaluation of Solar Projects:** Senior staff of the European Bank for Reconstruction and Development independent Evaluation Department discussed a June 2022 [Cluster Evaluation of Solar Power Projects](#). EBRD supported 69 solar projects in 13 countries with nearly €1.2 billion in financing from 2012 to 2020. EBRD also engaged in policy dialogue on preparing Power Purchasing Agreements, strengthening energy off-takers and arranging renewable energy auctions. However, Bank support for the solar sector had never been evaluated.
- **ADB's evaluation of its Support for Action on Climate Change (2011-2020):** Evaluators from ADB's Independent Evaluation Department shared insights and updates with AIIB staff from their thematic evaluation of ADB Support for Action on Climate Change, 2011–2020, [published in September 2021](#).
- **World Bank Group Support for Electricity Supply from Renewable Energy Resources: An Independent Evaluation:** in this session, the World Bank's Independent Evaluation Group presented [its report on exploring the challenges of removing barriers and mobilizing investments in the field of renewable energy](#). That work drew on cases studies in China, India, Jordan, Kenya, Mexico, Morocco, Nicaragua, Sri Lanka and Turkey. It considered 168 World Bank Group renewable energy projects (USD22 billion investment) across all major renewable energy technologies during the last 17 years.
- **European Investment Bank Independent Evaluation of EIB Support for Climate Change Adaptation (2015-2020):** As a contribution to the AIIB Energy Strategy Update, CEIU convened a Practitioner Dialogue for invited AIIB staff with the EIB independent evaluation office to discuss findings and insights from its Sep. 2021 [Evaluation of EIB Support to Climate Change Adaptation](#) (2015-2020).

Sharing Experience and Lessons: Early Learning Assessments (ELA)

ELAs consider selected AIIB financings during implementation to quickly identify and document high-quality, evidence-based and useful findings and lessons for current and future projects. As such, ELAs are not evaluations, but “snapshots” of financings in implementation.⁵ The process for selecting and conducting an ELA is outlined in a [Learning and Evaluation Framework Guide](#). CEIU coordinated closely with AIIB project team members and worked on CEIU ELA reports on two AIIB financings in 2022, involving one standalone project and one co-financed project respectively. Each focused on a different type of investment need to derive insights of wider benefit for Bank consideration: (a) large infrastructure and (b) financial intermediation. Some lessons of more general interest were:



1. Co-financing rehabilitation of large infrastructure for extended safety and benefit

- **Selection of a infrastructure rehabilitation project** with a strong lead cofinancier was a sound choice for AIIB in its formative years. Such a project entailed minimal risks, particularly in terms of the social and environmental risks often associated with greenfield infrastructure. The Bank was also able to tap into and benefit from substantial cofinancier project preparatory work, while adding value through timely investment.
- **Project preparation and technical assistance capacity:** AIIB benefitted from extensive preparatory work done by peer MDBs. In the longer term, AIIB has the option to continue pursuing co-financing arrangements or to further develop in-house capability for complex standalone project financing. The latter would require a concerted effort to build staff capacity and provide technical assistance, partnership arrangements or access to external funds to finance project preparation.
- **Procurement and implementation:** Key lessons were that (a) Planning procurement and implementation as a single phase with financing provided in two stages overcame project financing constraints and maintained necessary flexibility for sequential refurbishment to an extent not fully known at commencement and while operation of other parts of the infrastructure continues; (b) Co-financing created a harmonized interface for the client and ensured adequate resources and contingencies for the project; (c) Ensuring high quality, independent site-based technical supervision and monitoring, with the ability to make decisions, can support adaptive management during project implementation and crises such as COVID-19, and (d) Cross-border regional connectivity requires mutually-supportive cross-border environments and capacities. Flexibility and exploration of complementary options are important considerations in these contexts.

⁵ CEIU will conduct independent post-evaluations of completed stand-alone financings under its Project Learning Review (PLR) function.

- Where the **lead co-financier** has posted official/national country language translations of key E&S documents on its website, AIIB can also display those documents or links to them on its website via the Project page.

2. Financial Intermediation for Renewable Energy

- **Project preparation:** Development of relevant Project Result Frameworks and indicator selection for financial intermediation projects requires careful consideration, including for energy efficiency gains, GHG emission reduction, private capital mobilization, employment, gender and any corporate social responsibility elements, in addition to strong client capacity for data collection and analysis.
- Where relevant and appropriate, AIIB can consider requesting geographic coordinates for the project site construction activities that it finances to facilitate remote monitoring of project construction and to gain additional perspective on some site-based features and activities.
- **Project implementation and oversight:** Prudent use of over-the-counter derivatives can provide local currency funding to the client, devoid of foreign exchange risk and avoiding the possibility of a significantly heavier debt burden in contexts of depreciation.
- As subproject prepayments and churn can be common in FI operations, redeployment decisions need to include specific allocation of additional budget and staff resources to track responsible exit, implementation and monitoring of new sub-projects. AIIB may wish to consider more broadly its approach to short tenor financings.
- **GRMs and disclosure of information about them:** for new financings under the 2021 ESP, it would be helpful to explore with the sub-borrower ways in which (a) the PPM, PPM website, and subproject E&S information could be displayed on the sub-borrower website, and (b) summary E&S documents made available in local languages.

ELA Disclosure. AIIB's Board has determined that ELAs are deliberative documents of the Bank under AIIB's Policy on Public Information [exemptions](#) and, accordingly, these documents are not publicly disclosed. This is to allow for frank and efficient exchanges between staff, encouragement of pro-active learning and identification of relevant improvements in practice. Completed ELA are uploaded to the AIIB intranet for staff use and to the AIIB Board portal for Member reference.

AIIB 2022 INTERNATIONAL
ANTI-CORRUPTION DAY

INTEGRITY
STARTS WITH ME

HAPPENING TODAY!

Attendees become eligible to receive the 2022 Integrity token.

KEYNOTE SPEAKER EVENT
Professor Nikos Passas
Northeastern University

Tuesday
NOV. 29
9 a.m. on zoom

Anti-corruption Day. [International Anti-corruption Day](#) is observed every Dec. 9 to raise public awareness of corruption issues, following the passage of the [United Nations Convention](#)

[Against Corruption](#) in 2003. To mark the 2022 International Anti-Corruption Day, CEIU ran several activities, including various awareness raising updates to both internal and external clients, a custom-designed video on *Integrity@AIIB*, and a Keynote Lecture to Bank staff by Professor Nikos Passas of Northeastern University.

Integrity Advisories. “Integrity Matters” e-bulletins were sent to AIIB staff throughout the year to raise awareness of integrity issues relevant to AIIB’s operations and offer suggestions on ways to promote integrity in those projects. Through these e-bulletins, CEIU also announces updates to [AIIB’s Debarment List](#) on a regular basis.

7. AN “INDEPENDENT BUT ENGAGED” CEIU

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 contributing to, the rest of AIIB.

Providing Input to the Energy Strategy Update

Management invited CEIU to take part in its update of the AIIB Energy Strategy. In addition to preparing background material, summarizing relevant lessons from ELA, and joining meetings and discussions, CEIU provided comments and suggestions on the Energy Strategy Update Summary of Public Consultation and Energy Sector Strategy Revised Draft. CEIU also convened five Practitioner Dialogues in 2022 on and energy and climate-change-linked evaluations (Section 6 above). In this way CEIU was able to provide information that the Energy Strategy update team found useful in its deliberations.

Providing Input to the Update of the Accountability Framework

CEIU prepared background material and joined meetings and discussions to update AIIB’s Accountability Framework. CEIU also joined meetings and discussions on the AIIB Accountability Framework update. This included review of successive drafts of an Accountability Framework paper and participation in an informal Board seminar.

Reviewing and Reporting on Other Documents

Document review. CEIU regularly reviews and provides suggestions on draft Bank documents as part of its responsibility to keep abreast and informed of developments within a one-Bank approach. In particular, CEIU provided inputs to the “Guidance Note on Retaliation” prepared by the Management, the updated Operational Policy on Financing, revised Administrative Guidance and Directive on the ESF, draft administrative guidance on Know Your Client (KYC) and initial discussions on updating the Oversight Mechanism.

CEIU also commented and provided input on various other strategy papers, departmental directives, administrative guidance, annual and monitoring reports (including the Policy on Public Information, the 2023 Work Plan and Budget Planning process, IT Demand process, and draft MOU with CEXIM and KFW, the Energy Strategy Update Summary of Public

Consultation and Energy Sector Strategy Revised Draft, Paper on the Decisions to Support AIIB's Standing Emergency response Mechanism, the AIIB Annual Report, PSC Committee Annual Report, Sustainable Development Bonds Impact Report, Annual Corporate Procurement Report and quarterly Project Implementation Monitoring Reports (PIMR). While CEIU provides inputs and feedback, final decisions rest with Management and the Board.

Receiving Bank Training

In addition to providing training, CEIU staff also actively joined Bank trainings, including on Operational Risk Management; training organized by the Operational Services Department on the implementation of GRMs; Leading with Inclusion: Moving Beyond Unconscious Bias; and Respectful Workplace Environment.

Other Interdepartmental Support

CEIU also continued to provide support to other units of AIIB, taking part in the development of staff guidance, and providing information on CEIU functions.

Board Engagement

CEIU reports on a quarterly basis to the Board. It provides written updates of its workplan for the year and meets the Board face to face. CEIU staff also responded to pre-Board questions, attended pre-Board briefings and Board meetings and joined Board committees as observers throughout the year. CEIU also made Board committee presentations on completed ELAs throughout the year. Meetings took also place between CEIU staff and Board Directors throughout the year. The Dean of the Board also invited the Managing Director CEIU to a Directors Forum under the Oversight Mechanism.

8. STAKEHOLDER ENGAGEMENT

Engaging with Peer MDBs and International Institutions

CEIU continued to build its international presence and reach out to peer institutions through routine update calls, information exchange, participation in network activities and invitations to Practitioner Dialogue sessions. CEIU engaged in virtual calls with IAMs of ADB, EIB and EBRD. CEIU also held in-person meetings with the IAMs of the World Bank, IFC and IDB in Washington DC.

Key international engagements in 2022 included:

[IAMnet](#). CEIU participated in the Annual Meeting of the Independent Accountability Mechanisms Network (IAMnet) which was held in New York from Oct. 24-27, 2022. Approximately 120 representatives of Independent Accountability Mechanisms (IAMs) from international organizations and bilateral institutions attended the meeting. Best practices and the scope of the mandates of IAMs were given particular attention during the meeting.

EvalNet. The OECD Development Assistance Committee (OECD/DAC) Network on Development Evaluation (EvalNet) submitted its revised Mandate for OECD/DAC approval in early 2022. This included an EvalNet decision to accept AIIB and Islamic Development Bank (IsDB) as EvalNet International Institution Observers. CEIU discussed this process with the EvalNet Secretariat during 2022 and notification of successful acceptance was received on Dec., 12, 2022. AIIB and IsDB now join eight existing MDB and UN Evaluation Group (UNEG) members as EvalNet International Institution Observers.

CEIU also participated virtually in the hybrid OECD/DAC EvalNet 28th Annual Meeting (June 20-21) and discussions with peer UN, MDB and bilateral development agency members of EvalNet. Key topics included (a) the COVID-19 Global Evaluation Coalition; (b) an update on the Evaluation



28th Meeting of the OECD/DAC EvalNet.

Coordination Group (c) proposals for new evaluation working groups (c) “Old and New Impact Debates” and (d) challenges faced by independent evaluation units. CEIU later joined an EvalNet Webinar on Development Evidence Portals, among other events.

Asian Evaluation Week. CEIU participated in the (virtual) annual Asian Development Bank-Asian Financial Development Institute Asian Evaluation Week (Sep. 13-15) which included sessions on (a) rapid, real-time and formative evaluations of COVID-19 pandemic response; (b) evaluation and measurement of climate finance; and (c) use of digital tools in evaluation. A report of the meeting was prepared and summary submitted to senior Management.

Managing for Development Results (MfDR) Working Group on Outcome Orientation and the Independent Evaluations. This group was formed in early 2022 by nine international financial institutions to promote discussion among key staff engaged in results-oriented policy assurance, monitoring and independent evaluation.. Participants explained the monitoring and independent evaluation processes for results management in their organizations, provided activity updates and highlighted modes of cooperation. SPB, IMD and CEIU representatives took part in each session. A plenary meeting was held between group members and the MDB Evaluation Coordination Group (ECG) on June 10.

MDB Evaluation Coordination Group (ECG). CEIU actively participated in an inaugural ECG *Evaltalks Webinar: Boosting Evaluation with Artificial Intelligence (AI)* convened on behalf of the MDB Evaluation Coordination Group (ECG) by the EBRD Chief Evaluator (Nov. 7). Speakers from UNDP, World Bank Group and Asian Development Bank introduced (a) the use of AI for text mining, machine learning and geospatial analysis; (b) development of in-house data extraction systems; and (c) some future agency plans and challenges in using AI for lesson extraction and sharing. UNDP demonstrated its system of Artificial Intelligence for Data Analytics (AIDA).

Integrity-related Meetings. On September 13-14, CEIU attended the **Private Sector Integrity Meeting** hosted by the Black Sea Trade Development Bank (BSTDB) in Thessaloniki, Greece (September 13-14). Representatives from 16 IFIs discussed integrity/compliance

issues in IFI private sector operations, including integrity due diligence, AML/CFT, market abuse, data protection/privacy, among others.



MD-CEIU and CEIU Integrity Head join IFI delegates at the Private Sector Integrity Meeting.

CEIU attended the 22nd **Conference of International Investigators** (May 30 to June 3, 2022) in Luxembourg, which was hosted by the European Investment Bank (EIB). More than 150 investigators from Multilateral Development Banks, International Financial Institutions, United Nations agencies and other international organizations attended the session in person, along with over 450 online participants. The participants discussed issues of common concern in the field of investigation and hot anti-corruption topics in relation to the challenges of the COVID-19 pandemic, climate change, and the rise of cryptocurrency.



CEIU Integrity Head joins other investigations professionals at the 22nd Conference of International Investigators.

CEIU attended the **International Anti-Corruption Conference (IACC)** in Washington DC, United States of America (Dec. 6-10) hosted by Transparency International and the US Department of State, German Federal Ministry for Economic Cooperation and Development, GIZ, UNDP, and the World Bank. The IACC is the world's premier global forum for anti-corruption that brings together governments, civil society, the private sector and international financial institutions to tackle the increasingly sophisticated challenges posed by corruption.

One of the sessions that CEIU attended was on “*Ensuring Clean Development in Responding to Emergencies: How MDBs address Corruption Risks, Empower Stakeholders, and Work Together in Strengthening Integrity in Development Projects*”, which was organized by multilateral development banks that are signatory to the [Agreement for Mutual Enforcement of Debarment Decisions \(AMEDD\)](#).

CEIU also participated in a range of other integrity meetings, including (a) MDB Integrity Professionals Association Networking event with guest speaker: Michael Ostrove (World Bank Sanctions Board), (b) COSO/ICFR Working Group Meetings and a three-day symposium on supranational responses to corruption, (c) the MDB Integrity Professionals Association (MIPA) Roundtable on “*New Trends in Prevention of Integrity Risks in MDB-financed projects*” and (d) Webinar hosted by The Infrastructure Transparency Initiative (CoST) entitled “*Imagine an Africa with infrastructure transparency*”. Throughout the year, CEIU met with the heads of other MDB Integrity Offices remotely or on the sidelines of various events to discuss integrity-related concerns and areas for collaboration.

CEIU also provided information on AIIB's Prohibited Practices Policy to the World Bank for a chapter on MDBs and the IMF in its *Elgar Concise Encyclopedia of Corruption Law*.

Peer Institution Familiarization Events and Public Lectures.

Familiarization. CEIU delivered (a) a training to the staff of the New Development Bank (NDB) during their first “Procurement Knowledge Sharing Event” on the topics “Red Flags in Public Procurement and Integrity Due Diligence in Non-Sovereign Projects”, (b) an introduction to Integrity at AIIB at a sub-forum of the 2022 Honqiao International Economic Forum entitled “Belt and Road Initiative: Enterprise Integrity, Ethics and Compliance”; (c) an introduction to anti-corruption efforts of the Multilateral Development Banks for the Ministry of Finance of China.



Public Lectures. MD-CEIU delivered various public lectures, including on the “Emergence of Independent Accountability Mechanisms” at the Lahore University of Management Sciences (LUMS). The lecture aimed at raising awareness among the academic community about the

role of IAMs in enhancing transparency, accountability and development effectiveness of international financial institutions.

MD-CEIU also spoke at the 7th Global Procurement Conference in Rome, Italy on the topic: “Emerging Economies: Which Procurement?” This event is hosted by the University of Rome Tor Vergata and the European Bank for Reconstruction and Development (EBRD).



Client Outreach

CEIU spoke as part of a panel on “*The Challenges for MDB Project Procurement and Contractors under the Current Global Economics and Institutional Sanctions Regimes*” for the “*Workshop Series on MDB Procurement and Financing Business Opportunities and Policies*” for Chinese contractors, suppliers and consultants. This event was organized by Multilateral Cooperation Center for Development Finance (MCDF), China International Contractors Association (CHINCA), and AIIB.



CEIU Integrity Head presenting in the MCDF-AIIB-CHINCA Workshop on MDB Procurement and Financing Business Opportunities and Policies, Nov. 2022.

On April 14, 2022, CEIU conducted a virtual PPM outreach event with Implementing Agencies in Pakistan to raise awareness about the PPM. Implementing agencies from all provinces participated in the outreach event. Implementing agencies appreciated the information they learnt about PPM and engaged in an interactive Q&A session.

Civil Society Outreach

Conduct of Outreach Activities. CEIU continued to conduct civil society outreach activities as virtual events during the COVID-19 pandemic. A virtual meeting was held with CSOs in

March, June and July. In October, CEIU also organized the annual CEIU-CSO forum. More details on the outreach sessions and the CEIU-CSO forum are below:

Annual CEIU-CSO Forum. CEIU has convened a CEIU-CSO discussion forum at AIIB's [Annual Meeting](#) since 2017. Held on Oct. 26, the [Forum](#) was the third conducted virtually and involved all three CEIU functions in 2022. CSOs from different parts of the world raised questions about CEIU's role in the ESF review, Project-level GRMs, handling of complaints in cofinanced projects, potential access barriers to the PPM and broader functions of CEIU. Questions asked by CSO representatives focused mainly on the PPM. CSOs expressed particular concern with regards to the threat of reprisals in case complaints are lodged under GRMs and/or the PPM. Questions were also raised in relation to individual cases, financial intermediary projects and access to information. On Oct. 27, CEIU observed the AIIB Annual Meeting [Management-CSO Dialogue](#) on Oct. 27.



Outreach in Pakistan. CEIU led a virtual outreach event with more than 30 CSOs in Pakistan on March 29-30. It was jointly organized with IAMs of the World Bank, IFC and ADB.

Outreach in Nepal. On June 7-8, together with IAMs of the World Bank, IFC, ADB and EIB, CEIU organized a Joint IAM Outreach Event in Nepal. The event was attended by more than 65 participants, including more than 40 from CSOs in Nepal. Indigenous people also attended the session.

Outreach in Lebanon. On July 27-28, together with the IAMs of the World Bank, IFC, EIB and UNDP, CEIU organized a Joint IAM Outreach Workshop in Lebanon as a side event to the Annual General Assembly of the Arab Watch Coalition (AWC), which also acted as the counterpart organizers of the workshop. It was attended by CSOs from seven countries (Egypt, Iraq, Jordan, Lebanon, Morocco, Tunisia, and Yemen) in the Middle East and North Africa region. The workshop agenda covered wide ranging topics related to independent accountability on development projects and the work of IAMs. CEIU Managing Director Hamid Sharif participated in the workshop in-person. He spoke about the origins and evolution of IAMs and introduced AIIB's Project Affected People's Mechanism (PPM) to the CSO representatives from more than 25 CSOs from Egypt, Iraq, Jordan, Lebanon, Morocco, Tunisia, and Yemen.



9. MANAGING CASES AND CONCERNS

Project-affected People's Mechanism

The PPM received one submission during 2022 which is under eligibility assessment as of end-2022. The PPM Secretariat was also copied on complaints addressed to Management

and liaised with Management toward grievance resolution at the level of the project grievance redress mechanism (GRM). To strengthen transparency over which IAM applies in a given co-financed project, CEIU published this [list of co-financed projects](#) that details the applicability of the respective IAM.

Policy on Prohibited Practices

In 2022, CEIU continued to screen allegations and red flags of prohibited practices. There was one allegation of a prohibited practice that resulted in an ongoing investigation. CEIU also provided advice to Bank staff on anti-corruption and integrity issues, reviewed PPP-related provisions in project and financing documents, and clarified the application of specific debarment decisions to AIIB projects. CEIU also continued to raise awareness among staff of heightened integrity risks and other PPP-related matters through its *“Integrity Matters”* alerts.

Cross-Debarment. CEIU unilaterally recognizes the sanctions imposed by international organizations that are signatories to the Agreement for the [Mutual Enforcement of Debarment Decisions \(AMEDD\)](#).⁶ In mid-2022, CEIU increased the frequency of updates to the [Debarment List](#) from quarterly to monthly to provide all stakeholders with more timely information.

⁶ Para. 12.1 of the PPP states that under certain conditions entities debarred under the Agreement for the Mutual Enforcement of Debarment Decisions between some Multilateral Development Banks shall be unilaterally debarred by AIIB.