

## Attachment 4

### Implementing Retaliation Risk Mitigation Measures

AIIB incorporates mitigation measures for retaliation risk into its Project-financing cycle through five main steps:

- 1. Risk Identification:** The PPM makes a due diligence desk review of the risk environment and potential or actual risk of Retaliation against the Requestors, in-country Authorized Representative and other persons determined by the PPM to be relevant. This review forms a routine part of submission eligibility assessment. The PPM collates and endeavors to corroborate information from public sources, AIIB staff, international legal, financial, donor and governance institutions, NGOs and CSOs, private sector organizations, researchers, reporters and the Requestors. The review is documented as a restricted access report that is stored and protected within the PPM management information system. The first review report is updated as appropriate and especially if the likelihood of retaliatory risks increases, until the submission has been concluded or the Requestors and any in-country Authorized Representative indicates that confidentiality is no longer required. If the review report identifies that Retaliation may occur, MD-CEIU notifies Management and discusses any actions that Management may take to avoid increasing the risk to the safety of the Requestors, in-country Authorized Representative and other relevant persons. The PPM may also decide to forgo a site visit if this provides these persons with greater protection against Retaliation or avoids security risks to AIIB staff and consultants involved in the site visit.
- 2. Implementing Retaliation Mitigation Measures:** Following completion of the due diligence desk review, the PPM works with Management to identify Retaliation mitigation measures, if any. Other parties with specific expertise may also be involved in this process, but PPM retains the prerogative to implement the measures it considers necessary and feasible. These measures are specific precautionary actions and contact processes.
- 3.** Such measures may include safer locations, methods, timing and transport for site visits, meetings and other communication; and selection and use of trusted intermediaries, interpreters, information providers, consultants and facilitators, including during Dispute Resolution. Persons approaching the PPM may also request confidentiality of their identities or information in accordance with these Rules of Procedure. Free, prior and informed consent will be required before information, digital recordings or images of Requestors can be made public by the PPM.
- 4. Monitoring Risk of Retaliation:** The PPM has primary responsibility for monitoring, reviewing and updating Retaliation risk status and measures, in consultation with MD-CEIU and Management. Information, identities and findings may be shared on a confidential basis with co-financiers to enhance the response against Retaliation, provided the Requestors and any in-country Authorized Representative has given specific consent. Retaliation risk monitoring requires the risk identification report to be updated and contact maintained with

the Requestors and the in-country Authorized Representative, particularly after site visits or other meetings.

- 5. Responses to Retaliation:** If PPM monitoring or other information indicates that Retaliation has occurred despite precautionary measures, the PPM endeavors to communicate with the Requestors and in-country Authorized Representative to understand and corroborate the facts. The PPM then presents a Retaliation incident report to the President, Management, and the Board of Directors. The PPM and Management then attempt to implement any planned response developed with the Requestors and in-country Authorized Representative (where possible).
- 6. Improving Responses to Retaliation:** The PPM will work with the Independent Accountability Mechanisms Network, a professional association of IAMs, and other groups to advance development of approaches to effective reduction and management of Retaliation against Project-affected people. This may include developing an incident database and related information exchange measures, including naming of agencies or clients involved in Retaliation. The PPM learning function will also routinely capture and incorporate emerging good practices for mitigating the risks of Retaliation.