



# **CEIU STRATEGIC DIRECTIONS 2024-2030**

June 2024



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# Abbreviations

AIIB	—	Asian Infrastructure Investment Bank
AMEDD	—	Agreement for Mutual Enforcement of Debarment Decisions
AOA	—	Articles of Agreement
BOD	—	Board of Directors
CEIU	—	Complaints-resolution, Evaluation and Integrity Unit
CSO	—	Civil Society Organization
DEEP	—	Delivery, Effectiveness, Efficiency, and People
ECG	—	Evaluation Cooperation Group
EIB	—	European Investment Bank
ELA	—	Early Learning Assessment
ESP	—	Environmental and Social Policy
EvalNet	—	Network on Development Evaluations
GRM	—	Grievance redress mechanisms
IAM	—	Independent accountability mechanism
IAMnet	—	Independent Accountability Mechanisms Network
IFIs	—	International Financial Institutions
LCLG	—	Learning Culture Leading Group
LEP	—	Learning and Evaluation Policy
MDB	—	Multilateral development bank
NGO	—	Non-governmental organizations
NSBF	—	Non-sovereign-based financing
PLR	—	Project Learning Review
PPM	—	Project-Affected People's Mechanism
PPP	—	Policy on Prohibitive Practices
PSC	—	Policy and Strategy Committee
SBF	—	Sovereign-based financing
SDGs	—	Sustainable Development Goals
TOR	—	Terms of Reference

## 1. Introduction

1. **The Asian Infrastructure Investment Bank (AIIB) was established in January 2016** with the aim “to foster sustainable economic development, create wealth and improve infrastructure connectivity in Asia by investing in infrastructure and other productive sectors” and to promote regional cooperation and partnership in addressing development challenges (AIIB Articles of Agreement (AOA), Article 1.1).

2. **In the same year, the Complaints-resolution, Evaluation and Integrity Unit (CEIU) was established as an independent unit within AIIB.** Article 26(iv) of AOA empowers the AIIB Board of Directors (Board or BOD) to “supervise the management and the operation of the Bank on a regular basis, and establish an oversight mechanism for that purpose, in line with principles of transparency, openness, independence and accountability”. In 2019, the BOD created the “Oversight Mechanism”, of which the CEIU became an integral part. By the time the Oversight Mechanism was created, CEIU already had three years of experience under its belt. The Oversight Mechanism not only formalized the role of CEIU in AIIB’s governance, but it also further strengthened the effectiveness of CEIU.

### 1.1 CEIU Mandate

3. **Per the Board-approved Terms of Reference (TOR) , the primary responsibilities of the CEIU are to:** (a) provide an opportunity for an independent and impartial handling of external requests or complaints regarding compliance with the Asian Infrastructure Investment Bank (AIIB) Environmental and Social Policy (ESP) under the Project-affected People’s Mechanism (PPM) Policy; (b) strengthen institutional performance, credibility, internal and external accountability, and learning by selectively assessing the quality and results of the Bank’s ongoing and completed investment projects, operational policies, strategies and procedures in accordance with the AIIB Learning and Evaluation Policy (LEP); and (c) support the Bank’s “clean” values by investigating project-related fraud and corruption cases under the Policy on Prohibited Practices (PPP).

4. **CEIU has three functions:**

- **Complaints-handling Function**—implementation of the PPM, AIIB’s complaints-handling mechanism regarding compliance with the ESP.
- **Learning and Evaluation Function**—evaluative assessment of AIIB’s ordinary and special operations in accordance with the LEP.
- **Integrity, Anti-fraud and Corruption Function**—anti-fraud and corruption work carried out in accordance with the Policy on Prohibited Practices (PPP). This includes investigating and handling complaints relating to Prohibited Practices in Projects.

5. **Modeled after the Inspectorate General Office of the European Investment Bank (EIB), the three functions of CEIU are consolidated under one roof.** This allows for greater remains engaged with both Board and Management and contributes to the rest of AIIB. synergy between these functions (especially in deriving and sharing lessons learned) and supports the Board in its supervisory role. Experiences in other institutions (such as EIB and UN Agencies) have also shown that bringing independent functions under one roof can result in operational efficiency. A key consideration in designing CEIU was to ensure it could

exercise relevant functions independent of AIIB Management (Management) while ensuring that CEIU.

**6. CEIU is headed by its Managing Director (MD-CEIU). CEIU reports to the Board and regularly engages with Management on its activities in order to ensure effective communication and lessons-learning.** The CEIU annual work program and budget is approved by the Board within the Bank's business planning process, and the work program is publicly disclosed. CEIU staff is not subject to instructions by Management. CEIU is afforded timely and unrestricted access to Bank staff and information in their possession required for CEIU to carry out its functions. The MD-CEIU may meet periodically and at least once a year with members of the Board without the presence of Management in an informal setting. These features in the TOR of CEIU strengthen its independence and impartiality for performing its functions.

## 2. The First Seven Years of CEIU (2016-2023)

7. **During the first seven years of its existence, the CEIU, although small in size, has become an integral and recognized part of the governance of the AIIB.** CEIU has put in place a policy architecture with three separate Board-approved policies, governing the activities of each of the three functions of the CEIU. These include: Project-affected People's Mechanism (PPM) Policy; Learning and Evaluation Policy (LEP); and Policy on Prohibited Practices (PPP). All three functions of CEIU are operational; professional staff have been hired; key products developed; and training sessions have been provided to both CEIU staff and wider Bank staff.

8. **The CEIU structure has worked well for AIIB over these years and is considered by both Management and the Board as an efficient and lean solution for a modern and growing AIIB.** The structure avoids competition between the functions, allows for an integrated approach and synergies (in particular, on lessons-learning) and empowers the MD-CEIU. Also, unlike most MDBs where these independent functions were established in a piecemeal way and refined over time, AIIB was able to organize these functions systematically under "one roof" from the outset.

9. **All three functions of CEIU are performing their mandate, though the whole range of its products and services is yet to be fully tested.** As of mid-May 2024:

- a. The PPM function has handled four (4) submissions, though none of them were declared eligible. However, PPM closely liaises with IAMS of lead co-financiers who are handling a total of thirty-three (33) cases on nine (9) co-financed projects. In some instances, the PPM has been copied on complaints or letters from CSOs sent to the Management and PPM has followed up with the Management for expedited resolution of such matters. These are not formal complaints to PPM but instances in which PPM facilitated a dialogue between the complainants and Management for early resolution of issues through the project-level GRM.
- b. The Learning and Evaluation function has conducted ten (10) Early Learning Assessments (ELAs) on various projects as well as a first stage ELA on project-level Grievance Redress Mechanisms (GRM) in AIIB operations. In 2024, CEIU will conduct the first Project Learning Review (PLR) for a completed stand-alone financing.
- c. The Integrity function has completed two (2) investigations and received a total of fifty (50) complaints of alleged Prohibited Practices. There are nine (9) active complaints under review at the Intake Phase. Seven (7) sanctions have also been issued by the Sanctions Officer as a result of a CEIU investigation. No sanctions decisions have been appealed to the Sanctions Panel. As part of its advisory role, CEIU also regularly supports AIIB in the review of integrity-related matters and/or compliance to the Policy on Prohibited Practices (PPP), including: (i) reviews of project/financing/legal/procurement documents; (ii) compliance of counterparties to PPP provisions, and (iii) other integrity matters in corporate activities.

10. **As a key component of AIIB's Oversight Mechanism, CEIU strengthens the AIIB governance through its independent functions; raises staff, Management, and Board awareness on emerging issues and opportunities; and shares experiences and good practices from other international financial institutions (IFIs).** CEIU regularly organizes

Practitioner Dialogues for Board, Management and Bank staff with specialists from peer institutions who speak about topical issues. In addition to offering regular training programs for staff on its three functions, CEIU has developed e-learning courses on PPP and PPM and several other vehicles for dissemination of knowledge, best practices and lessons learned. ELAs are also important instruments which deliver to the same audience evidence-based findings and lessons for current and future projects. In addition, as part of its knowledge dissemination and learning task, the CEIU provides input to draft policies and strategies and reviews other Bank documents.

**11. Externally, CEIU regularly organizes outreach events for clients and CSOs in cooperation with other MDBs, especially under its PPM function.** The CEIU Forum with CSOs and NGOs is CEIU's annual engagement with civil society during annual meetings of AIIB. These forums provide an opportunity to listen to the issues raised by CSOs in relation to the work of CEIU and also to disseminate information on CEIU-related matters.

**12. CEIU is also actively engaging with peer MDBs and other IFIs to build up its international presence, especially in key professional networks and platforms.** CEIU is already a member of the Independent Accountability Mechanisms Network (IAMnet) and an observer of the OECD/DAC Network on Development Evaluations (EvalNet). CEIU regularly participates in the annual Conference of International Investigators, MDB Heads of Integrity Meetings, MDB Private Sector Integrity Meetings, and the Evaluation Cooperation Group (ECG). These events not only offer learning opportunities to CEIU and AIIB, but also facilitates AIIB's membership of professional organizations for CEIU's functional areas, which can further increase the weight and reputation of the CEIU. In addition, as required under the PPP, CEIU is actively engaging with the members of the Agreement for Mutual Enforcement of Debarment Decisions (AMEDD) to become a member of the cross-debarment arrangements among major MDBs.

**13. CEIU has adopted the DEEP Framework.** Under the leadership of its new MD, in 2023, CEIU adopted a framework based on the principles of Delivery, Effectiveness, Efficiency, and People (DEEP). Through the DEEP exercise, CEIU identified and documented a set of priority actions for the unit and each of the functional areas and provided a baseline for the monitoring and assessment of improvements in CEIU's work for the next three years. CEIU's DEEP exercise is the first input to this Strategic Directions Paper. Annex 1 provides the summary of CEIU's Deep Framework.

**14. CEIU conducted a Self-Reflection Exercise.** As a follow up to the DEEP exercise and the second input to the Strategic Directions Paper, CEIU initiated a Self-Reflection Exercise in late 2023 to assess the extent to which is CEIU fulfilling its dual mandate of accountability and learning. It considered CEIU's experiences so far, underscored its strengths, highlighted areas of improvement, and identified opportunities for informing its future strategic direction. An international expert supported this exercise. Together with CEIU Staff, the expert met with relevant internal stakeholders, including with the President, Board members, Vice Presidents, Director Generals, General Counsel, Advisors of the President, MD-CEIU, former MD-CEIU and CEIU staff. Annex 2 provides a high-level summary of observations and recommendations of this Self-Reflection Exercise.



### 3. The Next Five Plus Years: CEIU Strategic Directions (2024-2030)

15. **CEIU is entering its second phase of growth.** In the first seven years (2016-2023), CEIU created the base for its operations by setting up the normative infrastructure of the unit, positioning CEIU internally, building its reputation, and testing the systems it has put in place. As AIIB's operations mature and it continues to increase approvals and disbursements, develop new products, and gain more experience and exposure, CEIU's relevance as an important component of oversight will become more critical to AIIB. Given the growth and higher maturity of AIIB's operations, it is anticipated that AIIB will need to address increasing issues with project-affected people, distill knowledge through evaluation of completed operations and ongoing policies and strategies, and conduct more investigations into allegations of fraud and corruption in its operations. In its second phase (2024-2030), CEIU intends to develop its practice across three functions by refining and completing policy infrastructure, developing products to support new operations, fully operationalizing the systems, consolidating internal reputation, and building an international reputation.

16. This Strategic Direction Paper aims to define CEIU's approach in its second phase of growth and key directions for the next five plus years, leading up to 2030. It considers and builds on the accomplishments of past seven years and is guided by the DEEP Framework and the observations from the Self-Reflection Exercise.

#### 3.1 AIIB Corporate Strategy and Recent Developments

17. **The AIIB's Board approved Corporate Strategy is a fundamental reference point of CEIU's Strategic Directions.** AIIB's Corporate Strategy 2021-2030 defines its overarching objective as "Financing Infrastructure for Tomorrow". To achieve the Bank's mission of fostering sustainable economic development, creating wealth, and improving infrastructure connectivity as well as to promote regional cooperation and partnership, AIIB is focused on: (1) Green Infrastructure, (2) Connectivity and Regional Cooperation, (3) Technology-enabled Infrastructure and (4) Private Capital Mobilization.

18. **The Corporate Strategy builds on AIIB's core values of Lean, Clean and Green and includes five key pillars:** (i) establishing AIIB's market position; (ii) achieving impact at scale; (iii) adding value along the project cycle; (iv) serving a broad range of members; and (v) building a productive bank's corporate culture. The strategic intent of the Bank responds to a world facing multiple and growing challenges, including a climate crisis, heightened fragmentations and conflict, and setbacks in the achievement of the Sustainable Development Goals (SDGs).

19. **The Corporate Strategy is expected to be fine-tuned based on the ongoing AIIB Midterm Strategy Review, and AIIB will likely introduce Climate Policy Based Lending as a major new instrument.** This will have a significant impact in Bank's operations, but the thrust and directions established by the Corporate Strategy are not expected to significantly shift before the end of its implementation time frame in 2030.

20. **It is worth noting that during the implementation of the Corporate Strategy, AIIB has become a key player on working with other Multilateral Development Banks (MDBs) to strengthen collaboration and improving the way MDBs work as a system** to deliver greater scale and impact. This is consistent with the call from G20 Leaders for MDB to become a "better, bigger and more effective" MDB system, to address global challenges. Along these

lines, the Bank has intensified its cofinancing operations and introduced the mutual recognition and reliance on cofinancier systems in areas such as procurement, integrity, and Independent Accountability Mechanisms, all related to the mission entrusted to CEIU.

**21. Furthermore, internally, featuring a nonresident Board, the Bank has put in place an ambitious delegated-authority framework based on clear accountability principles,** intended to foster operational effectiveness and clear division of labor between Board and Management, with the Board exercising accountability upon Management and dedicating more time to providing policy and strategy direction.

**22. AIIB's agenda for the next few years will demand effective responsiveness to client needs, strong and smart operational growth, demonstrated development impact and capacity to effectively work in association with other MDBs and development partners.** These, in turn, must be supported by strong internal and external accountability, fast learning, application of high standards and institutional leadership. CEIU aims to support AIIB in delivering its Corporate Strategy and respond to institutional demands through the effective and efficient delivery of its mandate in its three functions.

### 3.2 CEIU Strategic Directions Framework

23. CEIU's Strategic Directions Framework (Framework) is composed of five (5) parts, and is aligned with AIIB's Corporate Strategy and Corporate Culture and supported by appropriate financial and staffing resources (see Figure 1):

- A. **Mission:** CEIU's Mandate as described in para. 1.1 of the Strategic Directions Paper.
- B. **Vision:** This summarizes CEIU's and the Managing Director's vision for the next five years and reflects CEIU strategic positioning internally and externally, and in support of achieving its Mission.
- C. **Strategic Objectives:** This describes CEIU's objectives for the unit (cross-cutting objectives) and all three functional areas (function-level objectives) in support of its Vision statement.
- D. **Priority Actions Plan:** This summarizes the unit- and functional-level priorities that CEIU intends to accomplish in the next five plus years (2024-2030) to achieve its Strategic Objectives.
- E. **Multiyear Work Program:** CEIU's updated Terms of Reference requires the introduction of a multiyear (three years) rolling work program. This reflects the specific deliverables in the medium term in consultation with AIIB Senior Management and the relevant Board committees. CEIU will continue to prepare its Annual Work Program as part of the Bank's regular planning process.



Figure 1. CEIU Strategic Direction Framework

### 3.3 CEIU Strategic Directions (2024-2030)

#### A. Mission

24. **CEIU’s Mission**, as stated in its TOR, is (a) to provide for an independent and impartial handling of external requests or complaints regarding compliance with the Asian Infrastructure Investment Bank (AIIB) Environmental and Social Policy (ESP); (b) to strengthen institutional performance, credibility, internal and external accountability, and learning; and (c) to support the Bank’s “clean” values by investigating project-related fraud and corruption cases.

#### B. Vision

25. **CEIU’s Vision by 2030** is “to become a highly valued independent and engaged oversight unit, internally and externally, recognized for its distinctive contribution to AIIB’s strategic intent, and insights on accountability and learning, where staff feels appreciated, trusted and empowered.”

#### C. Strategic Objectives

26. **CEIU will pursue its Mission and Vision by focusing on four (4) Cross-Cutting Strategic Objectives that encompasses the operations of the Unit as a whole and one (1) Strategic Objective for each of CEIU’s three functions.** These Strategic Objectives will be achieved through a set of carefully designed and executed Priority Actions. The following are CEIU’s Strategic Objectives:

##### C.1 Cross-Cutting Objectives

**27. Cross-Cutting Objective 1: Quality, Accountability, Learning and Results-Orientation.** Ensure the design and delivery of high-quality products, services, and strategic insights to promote internal and external accountability and learning, foster an AIIB results-oriented culture, and support AIIB's decision making on projects, policies, strategies, and related processes.

**28. Cross-Cutting Objective 2: Independence and Engagement.** Develop a strong and proactive engagement approach with internal stakeholders (Board, Management, Staff) and external stakeholders (implementing agencies, project-affected communities, peers, CSOs) while upholding independence, to enhance the value addition of CEIU's work and catalyze its effectiveness.

**29. Cross-Cutting Objective 3: Thought Leadership.** Advance thought leadership across the three functions, internally and externally, to contribute to AIIB's and CEIU's operations, interactions, knowledge, reputation and influence among stakeholder, especially regarding the efforts by MDBs to work as a system.

**30. Cross-Cutting Objective 4: Positive Workplace Culture.** Build a cohesive and collaborative CEIU workplace culture to facilitate efficient unit operations and professional and productive behaviors across the three CEIU functions, contributing to AIIB-wide efforts to build a strong institutional culture.

## **C.2 Function-Level Objectives**

**31. Function-Level Objective for PPM: Improve Effectiveness of PPM.** Continue efforts to develop PPM as a more visible, accessible, and effective independent accountability mechanism (IAM) that enhances AIIB's accountability and learning on the implementation of its environmental and social standards.

**32. Function-Level Objective for Learning and Evaluation: Build Solid Evaluation Evidence.** Build a valued and impactful body of credible, impartial and evidence-based findings and insights that inform and influence development results and lessons of AIIB projects, programs, policies and strategies.

**33. Function-Level Objective for Integrity: Deliver High Impact Investigations.** Ensure accountability through the delivery of professional, credible, and high-impact fraud and corruption investigations, advancement of integrity in projects and activities, and lead AIIB's anti-corruption agenda.

## 4. Implementing the CEIU Strategic Directions (2024-2030)

### 4.1 Priority Actions Plan

34. **The CEIU Priority Actions Plan summarizes the unit- and functional-level priorities that CEIU intends to accomplish in the next five plus years (2024-2030) to achieve its Strategic Objectives.** Priority actions at function-level are categorized under themes which include policy, products, outreach, learning and training and partnerships. Many of the priority actions were already set in motion in 2023 and progress has been made to date. CEIU will continue to report on the progress of these actions in its periodic reports to the Board and in its Annual Activity Review report.

35. **At the Unit Level, the key priority actions include:** improving and expanding CEIU products and services across three functions; developing a project results evaluation framework; delivering high-quality reports in content and format; engaging with the Board and internal stakeholders; engaging with external stakeholders; promoting thought leadership through strategic initiatives; promoting higher standards; and creating a secure environment that promotes transparency, mutual trust, respect and support.

36. **For the PPM, the ongoing PPM Policy Review and the development of the whole suite of PPM products and services, including dispute resolution and investigations remain the top priority.** In addition, CEIU will continue its efforts to improve PPM's visibility and accessibility, complemented by a communication and outreach strategy. CEIU will also deepen engagement with CSOs, develop an e-learning program for external stakeholders and organize high-quality learning events with peer IAMs.

37. **For Learning and Evaluation, the focus will be on implementing and delivering the Project Learning Reviews (PLR) for sovereign-based financing (SBF) and non-sovereign-based financing (NSBF) and developing higher plane evaluations, including policy, strategy, thematic, and process as needed, that are disclosed.** In addition, CEIU will work on building a lessons database for the use of staff and management; pursue the membership to the Evaluation Cooperation Group (ECG); intensify engagement along the production line of reports; advocate for the active work and effective operation of the Learning Culture Leading Group (LCLG); and develop a framework for the evaluation of NSBF.

38. **For Integrity, CEIU will prioritize the delivery of cases to test the full range of the Integrity infrastructure from investigation, sanctions and appeals.** In addition, CEIU will further strengthen its Integrity function through the planned updates to the Policy on Prohibited Practices and its related Directive and Administrative Guidance. It will continue to increase awareness on integrity and anti-corruption for AIIB and its clients through enhanced internal and external outreach activities. CEIU also intends to strengthen its internal investigations capacity through the development of its internal forensic capacities and other necessary systems.

## 4.2 Multiyear and Annual Work Programs and Resources

**39. To execute the Priority Actions Plan, CEIU will introduce a new Multiyear (Three-Year) Work Program.** CEIU currently prepares an Annual Work Program that is formulated during the Bank's annual business planning process. To better manage the delivery of the Priority Actions, CEIU will prepare a Multiyear (Three-year) Work Program, which will be adjusted annually to confirm the following year's program and required resources and calibrate the subsequent two-year scheduled activities and deliverables. The new Multiyear Work Program will be presented and discussed in the next budget and work program cycle.

**40. CEIU's Work Program will provide for flexibility for unprogrammed priorities and evolving institutional needs, including requests from the Board and relevant Board committees.** With this in mind, CEIU will closely engage with the Board and Management to ensure that its Annual Work Program, while aligned with the broad Strategic Directions, is also aligned with AIB's evolving context and requirements. CEIU aims to remain agile and responsive while efficiently utilizing its capacity and resources.

**41. The implementation of CEIU's Multiyear and Annual Work Programs will require an appropriate allocation of both financial and staffing resources.**

**42. Budget Plan.** Per the CEIU TOR, "the budget of CEIU will ensure both predictability and responsiveness in the implementation of the Work Program." The required financial resources will be requested annually as part of the internal budget planning process, and in accordance with the Annual Work Program agreed with Board and discussed with Management.

**43. Staffing Plan.** With respect to staffing resources, Annex 4 provides the proposed Staffing Plan for 2024-2026, which has already been presented to Management as part of the 2023 business planning cycle. As of December 31, 2023, CEIU has five (5) active staff members (4 professionals and 1 support staff). In the medium-term, CEIU will hire additional professionals in each of its three functions and expand the shared pool of analysts and support staff. By the end of 2024, CEIU will have a total of seven (7) professional staff, two (2) analysts, and two (2) support staff. Small additional growth is expected yearly until 2026 to cope with growing demands. Commensurate with CEIU Work Plan, hiring will be done on gradual basis to ensure steady buildup of CEIU capacity in its three functions. An element of flexibility and responsiveness will be kept in the Staffing Plan, allowing necessary adjustments in response to changing business needs.

**44. External Expertise.** In addition to the core professional and support staff, CEIU will continue to rely on support from external experts/consultants for short-term and specific tasks across the three functions, for which an appropriate allocation of budgetary resources will be requested as part of the regular Bank process.

## 5. Performance Monitoring and Evaluation

45. **CEIU's Strategic Directions are complemented by a Performance Monitoring and Results Framework (see Annex 5) which identifies key results and associated indicators at CEIU level and function level.** The Results Monitoring Framework will be used to inform CEIU's progress on delivering the Strategic Objectives and key Priority Actions at the unit and functional levels as well as an instrument for adaptation and course correction.

46. To assess and report its performance against the Performance Monitoring and Results Framework, CEIU will:

- a. Report on CEIU's progress as part of its Quarterly Report to the Board and the Annual Activity Review.
- b. Conduct a midterm internal review to assess if CEIU is on course for achieving its Strategic Direction and adjust accordingly.
- c. Carry out a Client Satisfaction Survey on bi-annual basis. This survey will assess satisfaction of internal and external stakeholders on CEIU's products and services.
- d. At the end of current MD-CEIU's term, advocate for a CEIU external evaluation commissioned by the Board - as contemplated in the TOR - to assess CEIU progress and identify new challenges.

47. As CEIU embarks in this new development phase, a great sense of optimism for the future and contribution of the three functions prevail in the CEIU team. By the end of 2030, CEIU will review the accomplishments under this Strategic Directions Paper vis-à-vis its stated goals, and identify challenges and lessons learned to inform the next phase of CEIU's development.

## Annex 1. DEEP Framework for CEIU

The Complaints-resolution, Evaluation and Integrity Unit has adopted a framework based on the principles of Delivery, Effectiveness, Efficiency, and People (DEEP), with Priority Actions identified and to be executed in each of these dimensions between 2023 and 2028. This report documents the actions defined in 2023 and provides a baseline for the monitoring and assessment of improvements in the CEIU work during the next five years. These actions will be adjusted as needed during this period to maximize the expected results of the implementation of this framework. The areas of the DEEP Approach can be summarized as follows:

**DELIVERY:** Actions intended to ensure the delivery of strategic products, processes, and services of the unit, such as development of a suite of products for each function to cater to the needs of different stakeholders, completion of process and procedures architecture and administrative guidance notes of the unit, revision of the Unit's ToR, review of the PPM Policy, and enhancement of the Unit's thought leadership internally and externally. These actions are divided into four sections: a) Architecture, b) Product and Services, c) Thought Leadership and d) Systems and Reporting.

**EFFECTIVENESS:** Actions for the purpose of improving CEIU's institutional effectiveness through improvement of quality control of reports, enhancement of CEIU templates/formats for the production of documents, presentations, publications and reports, good planning and focus of practitioner dialogues, conduction of Satisfaction Survey for CEIU, effective engagement with the Board, Management and Staff, effective engagement with CSOs, expanded partnerships, advocacy for learning culture, targeted outreach, and reduced service times to ensure no backlogs.

**EFFICIENCY:** Actions to enhance CEIU's management of its resources to maintain a high level of productivity, such and use of technology for in reach and outreach to reduce resource intensity, development of integrated Systems across CEIU and connected with the Bank's systems, development of case management system and enhancement of soundproofing of some offices to ensure privacy of interviews and exchanges.

**PEOPLE:** Actions focusing on staff wellbeing, development, and advancement, such as creating a secure environment, improving interpersonal relationships, encouraging openness and one-on-one conversations, promoting transparency, ensuring mutual trust and respect, and ensuring training hours. This area also includes definition of clear objectives of CEIU Staff, promoting work life balance, and ensuring adequate staffing of the Unit.



## Annex 2. Summary of CEIU Self-Reflection 2023

**Background:** In mid-2023, a new Managing Director of CEIU (MD-CEIU) was appointed and in preparation for the next phase of CEIU's development, the MD-CEIU is spearheading a self-reflection exercise. This self-reflection will support the production of a CEIU Strategic Directions Paper for the coming five years.

**Purpose:** The purpose of this self-reflection is to examine the effectiveness of CEIU in the fulfillment of its dual mandate of accountability and learning and to make suggestions for improvement where needed. The exercise considers CEIU's experiences so far, underscore its strengths, highlight areas of improvement and identify opportunities for informing its future strategic direction.

**Self-Reflection Dimensions: This review uses three core dimensions as lenses to guide its reflections: independence, credibility, and utility.**

- **Independence** is defined as the integrity of the working and decision-making processes and the absence of bias favoring the interests of certain stakeholders. It reflects the extent to which CEIU staff can be impartial and free from undue pressure or material threats to their independence as they perform their respective functions.
- **Credibility** derives from independence (in the sense of impartiality) and is a necessary condition for utility. In addition, it is derived from the professionalism of CEIU staff and the quality of the methods and processes in place to manage the activities of CEIU.
- **Utility** refers to the usefulness of outputs of CEIU (in terms of timeliness, relevance, quality and accessibility of its reports and advice).

The report uses these three lenses to look into areas such as mandate, structure, organizational positions, actual practice of CEIU, including relevance, effectiveness and efficiency, CEIU relations with internal and external stakeholders, and individual CEIU Policies.

This self-reflective review is based on: (i) interviews with key internal stakeholders, including Board Members, Senior Management and CEIU staff and (ii) an analysis of relevant documents of AIIB and CEIU. This exercise is not intended to be a full-fledged evaluation but a rapid, expert self-reflection of the of CEIU's experience thus far and its current status. No external stakeholders such as member governments, Bank clients, or civil society organizations were interviewed, nor a detailed analysis of CEIU end-products was undertaken.

**Self-Reflections on the CEIU set up: Mandate, structure, position, relevance, effectiveness and efficiency.**

**Mandate:** There is a broad agreement within the Bank that the dual mandate of CEIU is learning and accountability. This mandate is not explicitly mentioned as such in any Bank document or policy related to CEIU but can be indirectly constructed when putting together the wording from different strategy and policy papers, like the papers on the Accountability Framework and the Oversight Mechanism, the ToR for CEIU and the three policies of CEIU functions. Regarding the concept of accountability as used within the Bank, only the internal dimension of accountability is referred to in various policy papers. The external dimension of accountability (accountability vis-à-vis external stakeholders at large, including the public and people affected by the Bank's

activities), is equally important. The strong focus on internal accountability can be explained by the overriding issue of a non-resident Board holding Management accountable for the delegated responsibilities, which is well captured in the Paper on Accountability Framework<sup>1</sup>.

**Structure:** From its creation in 2016, CEIU has been composed of the Complaints-handling function, the Learning and Evaluation function and the Integrity, Anti-Fraud and Corruption function, although the exact naming of the functions might have changed somewhat over the years. Modelled similarly to the European Investment Bank (EIB) and unlike other large MDBs, the AIIB has chosen to bring these three functions under one roof, CEIU, headed by a Managing Director. Compared to most MDBs where these functions were established in a piecemeal way and refined over time, the AIIB was able to organize these functions systematically under “one roof” from the outset. The “one-roof” model is seen by many, both Board members and Management, as a beneficial and lean solution. It avoids competition between the functions, allows for an integrated approach and the creation of synergies (in particular regarding lessons-learning) and empowers the MD-CEIU.

**Organizational Position:** From its inception, it has been clear that the three functions of CEIU would be independent. This is also directly or indirectly stated (and in different degrees) in the Paper on the Oversight Mechanism, the Paper on the Accountability Framework and the ToR for CEIU. In practice, independence is not an absolute concept as independent entities always operate in a particular context. More specifically, independence does not mean outright isolation. This is also true for CEIU. An element of confusion exists with regard to the reporting line of the MD-CEIU and the associated factual and perceived independence of CEIU. Both papers on the Oversight Mechanism and the Accountability Framework and the ToR of CEIU clearly state that CEIU reports directly to the Board, but the MD-CEIU is not explicitly mentioned. However, CEIU is not a living individual and cannot speak, someone has to report for CEIU.

The mere fact that the President appoints and also has the power to dismiss the MD-CEIU may lead a perception among external stakeholders that Management may interfere with the processes, reports and decisions of CEIU. This, in practice, is not the case for the following reasons: (a) CEIU’s Terms of Reference is unequivocally clear that the Unit is completely independent in carrying out its day-to-day functions and reports directly to the Board; (b) the MD-CEIU is empowered to meet with members of the Board without the presence of Management in an informal setting. This particular clause enables the MD-CEIU to exercise their complete independence vis-a-viz the Board and is unique in governance structures of MDBs; and (c) the President appointments and may potentially dismiss the MD-CEIU only in consultation with the Board. Furthermore, the practice appointing the head of oversight function(s) is not unique to AIIB. Several MDBs and UN Agencies also follow the same practice.

In the spirit of staying informed of the strategic discussion taking place at the Management-level, the MD-CEIU is invited to the ExCom meetings as observer, has access to all information and can express himself freely. It is a matter of building and maintaining mutual trust. While the independence of CEIU is emphasized in various normative papers, the concept of CEIU being “independent and engaged” has significant traction in AIIB and represents an important feature of CEIU intended to enhance its effectiveness.

**Relevance:** Although CEIU is in its seventh year of existence, it cannot yet be judged entirely on the basis of its performance in the core tasks it covers, i.e., complaints-handling, performing full-

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<sup>1</sup> See AIIB, Paper on Accountability Framework, 2018. It should be noted that the new revised TOR of CEIU now refers to both internal and external dimensions of AIIB’s accountability.

fledged evaluations and investigating alleged prohibitive conduct. So far, the PPM has not handled any eligible complaint; the Evaluation function has not performed any full-fledged evaluation; and the Integrity function has only closed two investigations, of which one is substantiated. However, CEIU has established itself firmly within the governance of the AIIB. CEIU supports and strengthens the AIIB governance; it raises staff, Management, and Board awareness on emerging issues and opportunities; and shares experiences and good practices from other international financial institutions. This is done by varying means, including organizing Practitioner Dialogue sessions on topical issues, induction and advance sessions for new staff and meetings between Bank staff and MD-CEIU on CEIU-related subjects, regular operational trainings on CEIU functions, e-Learning courses on PPP and PPM, and a Case Dashboard about complaints registered by IAMs. Given the fast growth pace of the institution, the expectation is that in the coming years the three CEIU functions will have plenty of deliverables to show in the core tasks.

**Effectiveness and Efficiency:** Nearly all Board members saw CEIU as an indispensable instrument to help the non-resident Board hold the President and Management accountable for their actions, as CEIU provides them with independent, unbiased and objective information and analysis. Directors also saw CEIU as highly efficient in delivering its work program despite limited resources. Many Board Members called for an increase in resources commensurate with the strategic directions of CEIU for the coming five years. CEIU also has a very good reputation among senior members of Management, indicating that Management has benefited from all three functions. Although there is widespread recognition that the system is yet to be fully tested, as indicated above, the concept of an “independent and engaged” CEIU is widely embraced.

**Observations and Conclusions: Applying the three dimensions guiding this self-reflection exercise (independence, credibility, utility) to the position and functioning of CEIU, a positive though cautious picture emerges.**

**Independence:** The policies in place provide CEIU with sufficient support to act independently, but there are still some weak spots in the policies that should be addressed. For Board members (both regional and nonregional members) CEIU is recognized as an important instrument to help them keep the President and Senior Management accountable, but several see room for enhancing the factual and perceived independence of CEIU and for broadening its scope of action (e.g., scope of evaluation activities, PPM involvement, etc.). On the other hand, Bank Management emphasizes its appreciation for the learning side of CEIU, although management also realizes that it needs an independent and accountability focused CEIU to fulfill the expectations of the Board.

The opinions of Management about CEIU vary along the continuum of “nice to have”, “good to have” and “critical anchor” in Bank’s governance. It is therefore important for CEIU’s independence in fact and appearance that the reporting line of MD-CEIU is further clarified in future adjustments of policies (and CEIU ToR). This can be achieved by strengthening the language about CEIU’s functional independence in relevant policies and documents. One particular aspect that does not get sufficient attention in the Bank, but is an important issue in other MDBs, is the external dimension of accountability. A strong mission statement of CEIU which clearly indicates all aspects of its mandate, including internal and external accountability and learning, will certainly help to improve the position and perception of CEIU further<sup>2</sup>.

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<sup>2</sup> The new revised TOR of CEIU now refers to both internal and external dimensions of AIIB’s accountability.

**Credibility:** CEIU's credibility is high, partly derived from the policies underpinning its independence and from the fact that the MD-CEIU and his staff know how to implement the "independent and engaged" principle. Although there is some criticism about the way CEIU sometimes engages with other Bank staff, overall, the picture is positive: CEIU staff is seen as competent, unbiased and informally easy to approach. The in-reach activities of CEIU are very much appreciated but methods and processes for CEIU products are not always clear and crystalized. CEIU could also do a better job in explaining that they are part of the common mission of the Bank.

**Utility:** From the interviews it was not possible to assess the actual pick-up of lessons-learned coming from official reports, like the ELAs. What is clear is that all in-reach activities fulfill an important educational task, make the Board, Management and staff aware of how other MDBs deal with certain issues and provide lessons-learned. What is missing is a formal system to follow up on advice and recommendations issued by CEIU. This applies to all three functions. CEIU Annual Reports and Quarterly Reports to the Board could become more informative if they would provide better information about the content of reported discussions and meetings.

**Recommendations:** On the basis of this Self-Reflective Review, the following recommendations, organized under the four dimensions of the Delivery, Effectiveness, Efficiency and People (DEEP) Framework, are made:

#### **Delivery:**

1. Develop a complete mission statement for CEIU in the ToR of CEIU, which should contain both the internal and external dimension of the concept of accountability as well as the learning mandate of CEIU.
2. Further strengthen the perception of independence of CEIU by strengthening the language on functional independence of CEIU and reflect it holistically in one document as well as relevant policies of CEIU functions. This is particularly important to improve the external stakeholders' perception about CEIU's overall and functional independence.
3. Ensure the PPM Review is objective, aiming to enhance PPM's effectiveness, in particular PPM's visibility, accessibility, proactiveness and responsiveness to Project-affected People, and AIIB's accountability. In this process, ensure an inclusive, broad-based, transparent and meaningful stakeholder consultation process.
4. Test the whole suite of products under CEIU's three functions. As the system is not yet fully tested, start soon with an assessment of the products using focus groups to look at content and process assessments and conduct further research on the reasons why so few compliance reviews and integrity investigations have been triggered so far.
5. Consider including investigations of internal prohibitive conduct, i.e., internal investigations related to procurement, as part of CEIU's responsibilities.
6. Develop preventive measures against fraud and corruption (introduce pro-active integrity reviews, risk-based systems using big data, mandatory anti-fraud trainings).
7. Deepen relations with peer functions in other MDBs, including hosting common events where feasible, and start preparing for becoming a member of their "umbrella organizations" (for those where the AIIB is not a member yet). This will help to enhance CEIU's thought leadership, further improve the internal and external reputation of CEIU (functions) and AIIB, strengthen the position of CEIU (functions) within the Bank and elevate the learning process and quality of CEIU functions themselves.

8. Broaden the scope of the evaluation function and products to include not only project evaluation but also policies, strategies, thematic and processes.<sup>3</sup> Include a provision in the Learning and Evaluation Policy that the function may introduce new evaluation products in line with new developments in the field of evaluation and the evolving needs of the Bank.
9. Further improve the CEIU annual report and the quarterly reports to the Board, making them more analytical and substantive and not just providing factual information at activity-level. At the moment the reports mostly include “inputs” by CEIU and do not indicate much about why certain activities are being done and what the results are.

### **Effectiveness:**

1. Continue acting independently and staying engaged with Management. Both Board and Management see CEIU as a valuable entity within the governance architecture of AIIB. A CEIU without sufficient factual and perceived independence will lose its credibility vis-à-vis the Board and the world outside, while a CEIU that is not seen as being engaged will lose its credibility vis-à-vis Management.
2. Ensure that Management provides responses to and takes actions on recommendations of key CEIU reports. This will increase the weight of the recommendations and strengthen the quality of the dialogue between Management, Board and CEIU.
3. Re-consider the exemption of ELAs from public disclosure requirements, especially once projects have been completed.
4. Further intensify outreach with external stakeholders (especially CSOs and clients), and in-reach activities to increase the visibility of and understanding on CEIU functions.
5. Assess the effectiveness of CEIU products, processes and services for the operational staff using focus groups sessions.

### **Efficiency:**

1. Develop a department-wide system within CEIU for monitoring the follow up on recommendations from CEIU functions / reports.
2. Leverage technology to expand outreach of CEIU functions. Expanded and effective use of social media platforms can help inform key external stakeholders about activities of CEIU functions.
3. Develop e-learning platforms for internal and external trainings on CEIU functions.
4. Provide the integrity investigators with a space that can easily be closed. The Integrity function in particular handles very confidential and sensitive information and data. For interview purposes, the function needs a room where people can enter without noticed by others.

### **People:**

1. Urgently scale up CEIU resources given the importance and growing magnitude of its work. The Strategic Directions Paper of CEIU should clearly specify the headcounts under each function that will be needed in the coming year, to anticipate the growing volume of business. Both Management and Board are receptive to an

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<sup>3</sup> The new revised TOR of CEIU now includes these dimensions.

increase in resources, with the appropriate justification supporting it. Consideration should be given to hire staff with sufficient operational experience.

### Annex 3. CEIU Strategic Directions Implementation Plan 2024-2026

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
<b>Cross-cutting Strategic Objective for CEIU 1: Quality, Accountability, Learning and Results-Orientation.</b> Ensure the design and delivery of high-quality products, services, and strategic insights to promote internal and external accountability and learning, foster an AIIB results-oriented culture, and support AIIB’s decision making on projects, policies, strategies, and related processes.		
<b>CEIU Mandate:</b> Work with Board and Management to improve the Terms of Reference of CEIU (completed).		
<b>Self-Reflection:</b> Conduct a Self-Reflection to examine the effectiveness of CEIU in fulfilling its mandate (completed).		
<b>Strategic Directions:</b> Develop a Strategic Directions Framework for CEIU including a Vision, a set of medium-term objectives and priority actions with a strong focus on supporting institutional development results (completed).	<b>Strategic Directions:</b> Implement CEIU’s Strategic Directions and Plans.	<b>Strategic Directions:</b> Review progress of implementation of CEIU’s Strategic Directions and Plans.
<b>Products and Services:</b> Review existing CEIU products and services for each function and update the policy infrastructure to cater to the needs of different stakeholders and introduce strong product quality control.	<b>Products and Services:</b> Develop new CEIU products and services for each function, as needed, to cater to the needs of different stakeholders.	<b>Products and Services:</b> Develop new CEIU products and services for each function, as needed, to cater to the needs of different stakeholders.
<b>Project Results Evaluation Framework:</b> Work across the institution to support the development of a Project-level Results Evaluation Framework for sovereign and nonsovereign financings, encompassing both self and independent evaluation.	<b>Project Results Evaluation Framework:</b> Implement the Project-level Results Evaluation Framework.	<b>Project Results Evaluation Framework:</b> Review and further enhance the Project-level Results Evaluation Framework.
<b>Reporting:</b> Update CEIU Annual Report format to improve quality of the presentation of CEIU accomplishments.	<b>Reporting:</b> Prepare CEIU Annual Report based on new format.	<b>Reporting:</b> Continue to deliver CEIU Annual Report.

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
		<b>External Evaluation:</b> Advocate for an external independent evaluation of CEIU by 2028, before the appointment of the next CEIU MD.
<b>Cross-cutting Strategic Objective for CEIU 2: Independence and Engagement.</b> Develop a strong and proactive engagement approach with internal stakeholders (Board, Management, Staff) and external stakeholders (implementing agencies, project-affected communities, peers, CSOs) while upholding independence, to enhance the value addition of CEIU's work and catalyze its effectiveness.		
<b>Engagement with the Board and Internal Stakeholders:</b> Enhance engagement with Board, Management and staff in the three functions through a comprehensive in-reach program.	<b>Engagement with the Board and Internal Stakeholders:</b> Continue to strengthen engagement with Board, Management and staff in the three functions through a comprehensive in-reach program.	<b>Engagement with the Board and Internal Stakeholders:</b> Continue to strengthen engagement with Board, Management and staff in the three functions through a comprehensive in-reach program.
<b>Engagement with External Stakeholders:</b> Enhance engagement with AIIB Members, implementing agencies, project-affected communities, peers, CSOs through a comprehensive outreach program.	<b>Engagement with External Stakeholders:</b> Continue to strengthen engagement with AIIB Members, implementing agencies, project-affected communities, peers, CSOs through a comprehensive outreach program.	<b>Engagement with External Stakeholders:</b> Continue to strengthen engagement with AIIB Members, implementing agencies, project-affected communities, peers, CSOs through a comprehensive outreach program.
	<b>Client Satisfaction Survey:</b> Conduct bi-annual Satisfaction Survey for CEIU functions, starting 2025.	
<b>Cross-cutting Strategic Objective for CEIU 3: Thought Leadership.</b> Advance thought leadership across the three functions, internally and externally, to contribute to AIIB's and CEIU's operations, interactions, knowledge, reputation and influence among stakeholder, especially regarding the efforts by MDBs to work as a system.		
<b>Promote thought leadership:</b> Capitalize AIIB convening capability and partnerships to promote topical issues with the aim of positioning AIIB at the frontiers of institutional accountability and learning among the MDB community.	<b>Promote thought leadership:</b> Establish and host a CEIU flagship event at the AIIB Annual Meeting with the aim of positioning AIIB at the frontiers of institutional accountability and learning among the MDB community.	<b>Promote thought leadership:</b> Pilot and launch a thematic flagship report(s) / thought piece under CEIU functions.



Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
<p><b>Promote Higher E&amp;S and Accountability Standards Among Financial Institutions:</b> Develop a proposal for promoting the use of E&amp;S Standards and Independent Accountability among financial institutions in Asia.</p>	<p><b>Promote Higher E&amp;S and Accountability Standards Among Financial Institutions:</b> Implement the pilot project for promoting the use of E&amp;S Standards and Independent Accountability among financial institutions in Asia. Develop the Asia Accountability Week as a flagship event for financial institutions in Asia.</p>	<p><b>Promote Higher E&amp;S and Accountability Standards Among Financial Institutions:</b> Replicate the pilot project for promoting the use of E&amp;S Standards and Independent Accountability among financial institutions in another Members of AIIB.</p>
<p><b>Strategic Collaboration with National Anti-corruption Authorities:</b> Pursue signing a Memorandum of Understanding (MOU) with a national anticorruption authority in AIIB Members to facilitate referral of investigation findings and cooperation.</p>	<p><b>Strategic Collaboration with National Anti-corruption Authorities:</b> Develop partnerships and sign a Memorandum of Understanding (MOU) with national anticorruption authorities in AIIB Members to facilitate referral of investigation findings and cooperation.</p>	<p><b>Strategic Collaboration with National Anti-corruption Authorities:</b> Host the Conference of International Investigators (CII) to strengthen relationship with peer organizations.</p>
<p><b>Cross-cutting Strategic Objective for CEIU 4: Positive Internal Workplace Culture.</b> Build a cohesive and collaborative CEIU workplace culture to facilitate efficient unit operations and professional and productive behaviors across the three CEIU functions, contributing to AIIB-wide efforts to build a strong institutional culture.</p>		
<p><b>Staffing:</b> Ensure the allocation and recruitment of the minimum required staffing resources to effectively deliver the three functions.</p>	<p><b>Staffing:</b> Continue to ensure the allocation and recruitment of the minimum required staffing resources to effectively deliver the three functions.</p>	<p><b>Staffing:</b> Reassess the staffing needs in line with CEIU's emerging requirements to effectively deliver on its mandate.</p>
<p><b>Work Environment:</b> Create secure environment, promote transparency, ensure mutual trust, respect and support.</p>	<p><b>Work Environment:</b> Continue to provide a secure environment, promote transparency, ensure mutual trust, respect and support.</p>	<p><b>Work Environment:</b> Continue to provide a secure environment, promote transparency, ensure mutual trust, respect and support.</p>
<p><b>Working Style:</b> Define clear objectives for CEIU staff, manage expectations and promote work-life balance.</p>	<p><b>Working Style:</b> Continue to define clear objectives for CEIU staff, manage expectations and promote work-life balance.</p>	<p><b>Working Style:</b> Continue to define clear objectives for CEIU staff, manage expectations and promote work-life balance.</p>
<p><b>Capacity Building and Training:</b> Ensure a minimum number of days of capacity</p>	<p><b>Capacity Building and Training:</b> Continue to ensure a minimum number of</p>	<p><b>Capacity Building and Training:</b> Continue to ensure a minimum number</p>

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
training according to Bank standards and plan individual professional growth with each staff member.	days of capacity training according to Bank standards and plan individual professional growth with each staff member.	of days of capacity training according to Bank standards and plan individual professional growth with each staff member.
<b>Strategic Objective for PPM: Improve Effectiveness of PPM.</b> Continue efforts to develop PPM as a more visible, accessible, and effective independent accountability mechanism (IAM) that enhances AIIB's accountability and learning on the implementation of its environmental and social standards.		
<b>PPM Policy:</b> Initiate PPM Policy Review and conduct public consultations on emerging issues.	<b>PPM Policy:</b> Complete PPM Policy Review. As may be needed, update related policy documents (PPM Directive and Rules of Procedure).	<b>PPM Policy:</b> Continue to implement PPM Policy.
<b>Submissions to PPM:</b> Effectively and efficiently handle all submissions to PPM.	<b>Submissions to PPM:</b> Effectively and efficiently handle all submissions to PPM.	<b>Submissions to PPM:</b> Effectively and efficiently handle all submissions to PPM.
<b>Case Management System:</b> Organize and publicly disclose the information on cases registered with IAMs of lead co-financiers.	<b>Case Management System:</b> Initiate the development of a PPM Case Management System.	<b>Case Management System:</b> Launch the PPM Case Management System.
<b>Outreach:</b> Continue outreach activities of PPM for improving its visibility among AIIB clients, CSOs and project-affected communities in key borrowing members.	<b>Outreach:</b> Prepare a communication and outreach strategy. Continue routine outreach.	<b>Outreach:</b> Implement the communication and outreach strategy. Enhance outreach efforts beyond key borrowing members.
<b>Engagement with Civil Society:</b> Deepen engagement with international and grassroots CSOs.	<b>Engagement with Civil Society:</b> Intensify engagement with CSOs – capacity building, interacting and trust building with them.	<b>Engagement with Civil Society:</b> Continue a constructive ongoing dialogue and engagement with CSOs through wide-ranging activities.
<b>Learning and Training:</b> Organize high-quality learning events with peer IAMs.	<b>Learning and Training:</b> Develop training and more E-learning programs on PPM for implementing agencies (IAs) and Civil Society Organizations (CSOs).	<b>Learning and Training:</b> Jointly develop knowledge and learning products in collaboration with peer IAMs.
<b>Partnerships:</b> Take leadership in selected works streams of the	<b>Partnerships:</b> Host annual meetings of Independent Accountability Mechanisms	<b>Partnerships:</b> Host the Annual Meeting of the Asia Accountability Week for Financial Institutions.

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
Independent Accountability Mechanism Network (IAMnet).	Network (IAMnet) and Asia Accountability Week.	
<b>Strategic Objective for Learning and Evaluation: Build Solid Evaluation Evidence.</b> Build a valued and impactful body of credible, impartial and evidence-based findings and insights that inform and influence development results and lessons of AIIB projects, programs, policies and strategies.		
<b>Learning and Evaluation Policy:</b> Develop new guidance notes, including for (a) PLR approach paper and (b) private sector evaluations.	<b>Learning and Evaluation Policy:</b> Develop additional guidance notes as needed.	<b>Learning and Evaluation Policy:</b> Initiate the review of Learning and Evaluation Policy in light of experience gained in its application and the evolving needs and priorities of the Bank.
<b>Evaluation Products:</b> Pilot the first Project Learning Review (PLR).	<b>Evaluation Products:</b> Conduct 6 PLRs for standalone financing in next three years.	<b>Evaluation Products:</b> Continue with PLRs for standalone financing.
<b>Higher Plane Evaluations:</b> Develop protocol for higher plane evaluations and deliver higher plane assessments for the corporate strategy midterm review in 2024 and for the Delegated Authority process.	<b>Higher Plane Evaluations:</b> Initiate a series of higher plane evaluations on policy, strategy and special topics, including a cluster evaluation of Crisis Recovery Facility (CRF) and Non-sovereign Backed Financing (NSBF) Funds in 2025.	<b>Higher Plane Evaluations:</b> Consolidate a series of higher plane evaluations on policy, strategy and special topics, including a cluster evaluation of Crisis Recovery Facility (CRF) and Non-sovereign Backed Financing (NSBF) Funds.
<b>Learning Culture Leading Group (LCLG):</b> Intensify engagement along the production line of reports and support the commencement and effective operation of the LCLG.	<b>LCLG:</b> Continue to intensify engagement along the production line of reports and support the commencement and effective operation of the LCLG.	<b>LCLG:</b> Continue to intensify engagement along the production line of reports and support the commencement and effective operation of the LCLG.
<b>Management Response to CEIU Reports:</b> Advocate for the delivery of official management responses to key CEIU reports to enrich the quality of discussions at the Board and Committees	<b>Management Response to CEIU Reports:</b> Advocate for the delivery of official management responses to key CEIU reports and follow to recommendations.	<b>Management Response to CEIU Reports:</b> Advocate for the delivery of official management responses to key CEIU reports and follow to recommendations.
<b>Learning and Training:</b> Provide regular training on Evaluation.	<b>Learning and Training:</b> Develop training and E-learning programs on Evaluation.	<b>Learning and Training:</b> Build a lessons database or storage for the use of staff and management.

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
<b>Partnerships:</b> Explore membership to the Evaluation Cooperation Group (ECG).	<b>Partnerships:</b> Intensify engagement with OECD DAC EvalNet in selected streams.	<b>Partnerships:</b> Explore hosting the specialized events with OECD DAC EvalNet members.
<b>Strategic Objective for Integrity: Deliver High Impact Investigations.</b> Ensure accountability through the delivery of professional, credible, and high impact fraud and corruption investigations, advancement of integrity in projects and activities, and lead AIIB's anti-corruption agenda.		
<b>Policy on Prohibited Practices:</b> Initiate discussions to update the PPP for Project-related Prohibited Practices investigations involving Bank Personnel. Update PPP Directive and Administrative Guidance to ensure that the documents are complete, clear, and provide sufficient guidance to all parties.	<b>Policy on Prohibited Practices:</b> Finalize update of the PPP for Project-related Prohibited Practices investigations involving Bank Personnel. Develop guidance on new products, instruments, or processes related to integrity and anti-corruption, as needed.	<b>Policy on Prohibited Practices:</b> Develop guidance on new products, instruments, or processes related to integrity and anti-corruption, as needed.
<b>Investigations:</b> Ensure zero backlog of cases and complete new case investigations.	<b>Investigations:</b> Ensure zero backlog of cases and complete case investigations to test the full range of the integrity infrastructure (investigation, sanction, and appeals).	<b>Investigations:</b> Continue to test the full range of the integrity infrastructure (investigation, sanction, and appeals).
<b>Case Management System:</b> Initiate the development of the Integrity Case Management System (CMS) – Phase 1 (Intake and Investigations) (started in 2024) to support monitoring and reporting of cases.	<b>Case Management System:</b> Pilot/Launch the Integrity Case Management System (CMS) – Phase 1 (Intake and Investigations) to support monitoring and reporting of cases. Initiate Phase 2 of the Integrity Case Management System (CMS) Project (Sanctions and Appeals) to support monitoring and reporting of sanctions cases and appeals.	<b>Case Management System:</b> Fully implement the Integrity Case Management System (CMS) – Phase 1 (Intake and Investigations) to support monitoring and reporting of cases. Pilot/Launch Phase 2 of the Integrity Case Management System (CMS) Project (Sanctions and Appeals) to support monitoring and reporting of sanctions cases and appeals.
<b>Internal Capacity Building:</b> Establish internal forensic capacity through the creation of the Integrity Forensic Laboratory (started in 2023).	<b>Internal Capacity Building:</b> Strengthen internal forensic capacity by adding tools and services for Integrity Forensic Laboratory, and training.	<b>Internal Capacity Building:</b> Strengthen internal forensic capacity by adding tools and services for Integrity Forensic Laboratory, and training.

Priority Actions in 2023-2024	Priority Actions in 2025	Priority Actions in 2026
<b>Outreach:</b> Pilot an external outreach activity on integrity and anti-corruption for AIIB client(s).	<b>Outreach:</b> Intensify external outreach activities on integrity and anti-corruption for AIIB clients.	<b>Outreach:</b> Review external outreach activities on integrity and anti-corruption for AIIB clients.
<b>Learning and Training:</b> Deliver internal training and outreach to Bank Personnel through the regular Practitioner Dialogue, Integrity-related updates and Anti-Corruption Event.	<b>Learning and Training:</b> Update the e-learning program on PPP for Bank Personnel to increase awareness on integrity and anti-corruption.	<b>Learning and Training:</b> Develop new courses on integrity and anti-corruption for Bank Personnel to increase awareness on integrity and anti-corruption.
<b>Partnerships:</b> Strengthen relationships with MDB Heads of Integrity, the Conference of International Investigators (CII), and other partner organizations, including signing Integrity Memoranda of Understanding (MOUs) with organization(s) that have a co-financing agreement(s) with AIIB, as needed.	<b>Partnerships:</b> Strengthen relationships with MDB Heads of Integrity, the Conference of International Investigators (CII), and other partner organizations, including signing Integrity Memoranda of Understanding (MOUs) with organization(s) that have a co-financing agreement(s) with AIIB, as needed.	<b>Partnerships:</b> Host a Heads of Integrity (HOI)/Heads of Private Sector Integrity Meeting to strengthen relationship with MDB Heads of Integrity.

**Annex 4. CEIU Staffing Plan 2024-2026**

	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
<b>Total CEIU</b>	Professional Staff: 4 Analysts: 0 Executive Assistant: 1 Support Staff: 0	Professional Staff: 7 Analysts: 2 Executive Assistant: 1 Support Staff: 1	Professional Staff: 9 Analysts: 2 Executive Assistant: 1 Support Staff: 2	Professional Staff: 10 Analysts: 3 Executive Assistant: 1 Support Staff: 2
<b>MD-CEIU Front Office</b>	Professional Staff: 1 Executive Assistant: 1	Professional Staff: 1 Executive Assistant: 1	Professional Staff: 1 Executive Assistant: 1	Professional Staff: 1 Executive Assistant: 1
<b>CEIU Shared Resources</b>	Analysts: 0 Support Staff: 0	Analysts: 2 Support Staff: 1	Analysts: 2+1 Support Staff: 1+1	Analysts: 3 Support Staff: 2
<b>Complaints-resolution</b>	Professional Staff: 1	Professional Staff: 1+1	Professional Staff: 2	Professional Staff: 2+1
<b>Learning &amp; Evaluation</b>	Professional Staff: 1	Professional Staff: 1+1	Professional Staff: 2+1	Professional Staff: 3
<b>Integrity</b>	Professional Staff: 1	Professional Staff: 1+1	Professional Staff: 2+1	Professional Staff: 3

## Annex 5. DRAFT CEIU Performance Monitoring and Results Framework

No.	Result	Indicator	Baseline	Target
<b>CEIU</b>				
1.	CEIU products and services provide the Board with credible and relevant information for the Board to fulfill its oversight responsibilities.	% of favorable responses from the Board to CEIU Client Satisfaction Survey Question <i>"To what extent are you satisfied with the support that CEIU provides to the Board through its products and services."</i>	-	
2.	CEIU utilizes its budget in an effective and efficient manner to deliver its Annual Work Program.	% budget utilization rate based on Annual Budget.	33%	
3.	CEIU effectively implements its Staffing Plan.	% completion of staff hiring based on Staffing Plan	100%	
4.	CEIU staff is "engaged" as per the staff engagement survey.	% of favorable "Engagement" in Staff Engagement Survey.	75%	
5.	CEIU effectively works as a team to achieve its mandate.	% of favorable "Teamwork" in Staff Engagement Survey.	55%	
<b>Project-affected People's Mechanism</b>				
6.	CEIU handles all submissions to PPM in a timely and efficient manner.	% of cases closed within 12 months.	100	
7.	CEIU enhances PPM's visibility and accessibility to the CSOs and project-affected communities.	CSOs perception of PPM visibility and accessibility measured through PPM bi-annual CSOs survey.	-	
8.	CEIU provides effective PPM training to operational staff.	% of AIIB staff who rate the quality and usefulness of trainings provided by PPM as 'Useful' or 'Highly Useful'.	-	
<b>Learning and Evaluation</b>				
9.	CEIU completes ELAs and PLRs in a timely manner.	Time taken to complete an ELA and PLR from commencement to completion based on the Annual Work Program.	-	
10.	CEIU project evaluations inform decision-making processes/project course corrections at different levels in the AIIB to improve learning and results.	Use of CEIU Evaluation products by the AIIB based in CEIU Client Satisfaction Survey <i>"Thinking of the CEIU Evaluation products (ELAs and PLRs) you have read in the past 12 months, to what extent did you use them</i>	0	

		<i>for a reference in designing AIIB financings?" (TBD).</i>		
11.	CEIU successfully develops a series of higher plane evaluations, including policy, strategy, thematic, and process evaluations.	No. of thematic evaluations completed based on the Annual Work Program.	0	
<b>Integrity</b>				
12.	CEIU completes investigations of complaints relating to Prohibited Practices in a timely manner.	% of investigations completed within twelve (12) months from date of case opening (Investigation Phase).	-	
13.	CEIU provides appropriate and timely integrity- and anti-corruption-related review, clearance, advisory, and outreach.	% of integrity- and anti-corruption-related engagements provided within the timeline.	-	