



ASIAN INFRASTRUCTURE  
INVESTMENT BANK



# 2024 ANNUAL ACTIVITY REPORT

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Complaints-resolution, Evaluation and Integrity Unit

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# CONTENTS

<b>ABBREVIATIONS</b>	<b>iv</b>
<b>MESSAGE</b>	<b>vi</b>
<b>FOREWORD</b>	<b>vii</b>
<b>JOINT MESSAGE</b>	<b>viii</b>
<b>INTRODUCTION</b>	<b>2</b>
Core Functions of CEIU	2
Engagement with the Board	2
Strategic Objectives and Priority Actions	3
Work Plan and Budget	4
Leadership Transition, Staffing and Team Development	4
<b>HIGHLIGHTS OF 2024 CEIU ACTIVITIES</b>	<b>6</b>
<b>COMPLAINTS-RESOLUTION</b>	<b>10</b>
Project-affected People's Mechanism (PPM) Policy Review	10
Handling of Submissions	12
Outreach and Engagement	12



<b>LEARNING AND EVALUATION</b>	<b>14</b>
Thematic Evaluations	14
Project Learning Review (PLR)	15
Early Learning Assessments (ELA)	17
Outreach and Engagement	17
<b>INTEGRITY</b>	<b>20</b>
Review of Complaints and Investigation into Prohibited Practices	20
Reports of Prohibited Practices in Co-financed Projects	21
Integrity Risk Reviews	21
25th Conference of International Investigators (CII)	21
Outreach and Engagement	22
International Anti-Corruption Day at AIIB	25
Support to AIIB's Sanctions System	26
<b>CONCLUSION</b>	<b>28</b>





# ABBREVIATIONS

<b>ADB</b>	Asian Development Bank
<b>AIIB</b>	Asian Infrastructure Investment Bank
<b>AMEDD</b>	Agreement for Mutual Enforcement of Debarment Decisions
<b>APAIF</b>	Asia-Pacific Anticorruption and Integrity Forum
<b>ARC</b>	Audit and Risk Committee
<b>BHRC</b>	Budget and Human Resources Committee
<b>CAO</b>	Compliance Advisor Ombudsman
<b>CEIU</b>	Complaints-resolution, Evaluation and Integrity Unit
<b>CHINCA</b>	China International Contractors Association
<b>CII</b>	Conference of International Investigators
<b>COI</b>	Conflicts of Interest
<b>CPDI</b>	Pakistan Centre for Peace and Development Initiatives
<b>CRF</b>	Crisis Recovery Facility
<b>CS</b>	Corporate Strategy
<b>CSOs</b>	Civil Society Organizations
<b>DEval</b>	German Institute for Development Evaluation
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EIB</b>	European Investment Bank
<b>EIB CM</b>	European Investment Bank's Complaints Mechanism
<b>ELA</b>	Early Learning Assessment
<b>ESP</b>	Environmental and Social Policy
<b>EvalNet</b>	Network of Development Evaluation
<b>GRM</b>	Grievance Redress Mechanism
<b>GRRP</b>	Gujarat Rural Roads Project
<b>HOI</b>	Heads of Integrity
<b>IAM</b>	Independent Accountability Mechanism
<b>IAMnet</b>	Independent Accountability Mechanisms Network
<b>ICAC</b>	Independent Commission Against Corruption
<b>IED</b>	ADB's Independent Evaluation Department
<b>IFAD</b>	International Fund for Agricultural Development
<b>IFC</b>	International Finance Corporation

<b>INT</b>	World Bank's Integrity Vice Presidency
<b>IsDB</b>	Islamic Development Bank
<b>LEP</b>	Learning and Evaluation Policy
<b>MCDF</b>	Multilateral Cooperation Center for Development Finance
<b>MD-CEIU</b>	Managing Director of the Complaints-resolution, Evaluation, and Integrity Unit
<b>MDB</b>	Multilateral development banks
<b>MENA</b>	Middle East and North Africa
<b>MOOS</b>	Massive Open Online Seminar
<b>MOU</b>	Memorandum of Understanding
<b>NDB</b>	New Development Bank
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>OECD/DAC</b>	OECD's Development Assistance Committee
<b>OFE</b>	Open Floor Exchange
<b>OTP</b>	Operational Training Program
<b>PLR</b>	Project Learning Review
<b>PPM</b>	Project-Affected People's Mechanism
<b>PPP</b>	Policy on Prohibited Practices
<b>PSC</b>	Policy and Strategy Committee
<b>TOR</b>	Terms of Reference
<b>UN</b>	United Nations
<b>UNDP</b>	United Nations Development Programme
<b>WB</b>	World Bank
<b>WB-IMF</b>	World Bank-International Monetary Fund
<b>XNAI</b>	Xiamen National Accounting Institute





# MESSAGE

I would like to congratulate the Complaints-resolution, Evaluation, and Integrity Unit (CEIU) for its continued strong performance in 2024. This Annual Activity Report is a testament to the Unit's continued professionalism and clarity of purpose and highlights its ongoing commitment to supporting AIIB's deeply rooted culture of accountability, transparency, and learning.

As the global development landscape evolves, CEIU's work remains central to everything the Bank does. Its core functions—Complaints-resolution, Evaluation, and Integrity—not only support the Board's oversight role but also foster a culture of perennial institutional learning and trust across the Bank. As AIIB continues to grow and adapt to changed situations, CEIU's workload will increase, and its monitoring and supervisory role will be further strengthened. This approach is of vital importance for maintaining the Bank's effective development impact and its credibility and reputation.

AIIB's founders have positioned CEIU as "Independent and Engaged," a model that ensures the Unit operates with the necessary objectivity while being closely involved with the Bank and its management and also allowing it to actively inform and shape Bank management decision-making processes. Its independence ensures that CEIU can operate credibly, while its engagement ensures that CEIU's insights are timely, relevant, and absorbed into the fabric of the institution. This balance of independence and engagement is key to the Unit's effectiveness.

I would like to recognize Marvin Taylor-Dormond for his leadership in shaping CEIU's direction. With Hwee Tin Kng currently serving as Acting Managing Director while a replacement is found, I am confident that CEIU will continue to make progress in alignment with the Bank's priorities.

Throughout the year, CEIU revisited its Terms of Reference, defined its strategic direction, and set out a multi-year work program which aligned its work program with the Bank's evolving priorities. These efforts are not only technical milestones but reflect the Unit's focus on its core mission and its relevance to AIIB's goals.

As we celebrate AIIB's tenth year, I am proud of what we have accomplished together as a Bank and of CEIU's achievements as its crucial component. I have been unwavering in my support for CEIU's independent role within the Bank and its engagements across the institution. The ability to listen, learn and adapt guided by evidence and principles is crucial to the success of AIIB in the years ahead.

I would like to thank the CEIU team for their continued dedication. I look forward to working together to advance AIIB's mission of financing infrastructure for the future.

**Jin Liqun**

President and Chair of the Board of Directors

# FOREWORD

I am pleased to share with you the 2024 Annual Activity Report of the Complaints-resolution, Evaluation and Integrity Unit (CEIU or the Unit) of the Asian Infrastructure Investment Bank (AIIB or the Bank). This report offers a concise summary of the Unit's key accomplishments over the past year and serves as part of CEIU's commitment to transparency and accountability to all relevant AIIB stakeholders.

The year 2024 was a significant and dynamic year for CEIU. Under the leadership of my predecessor, Marvin Taylor-Dormond, the Unit made important strides to strengthen its foundations and set a clear direction for its future. I am honored to have assumed the role of Acting Managing Director in December 2024 and look forward to continuing the work of a dedicated and capable team that plays a vital role in upholding the Bank's integrity, learning, and accountability architecture.

Among the year's most notable milestones was the revision of CEIU's Terms of Reference (TOR), undertaken in close partnership with AIIB Management. The updated TOR reflects the Unit's evolution, aligns with current policies, and captures operational lessons learned over recent years. This revision provides a renewed clarity of purpose and sets the stage for CEIU's next phase of development.

To further strengthen our long-term focus, CEIU prepared and submitted two foundational documents—the *Self-Reflection Exercise* and the *Strategic Directions Paper (2024-2030)*—to the Board. These were developed through a consultative process and outline a forward-looking vision for CEIU, informed by the Delivery, Efficiency, Effectiveness and People (DEEP) approach. In line with these strategic directions, CEIU also presented its first *CEIU Work Program 2025-2027*, providing a practical roadmap to guide our priorities across our three functions.

Throughout 2024, CEIU continued to deliver on its oversight mandate. Our Complaints-resolution Function advanced the review of the Policy on the Project-affected People's Mechanism (PPM), amongst others by the finalization of an External Review and holding extensive stakeholder consultations. The Evaluation Function completed the first two thematic evaluations, namely the *Independent Review of the Delegated Project Approval Process* and the *Independent Assessment of the Midterm Review of AIIB's Corporate Strategy*, and the first two Project Learning Reviews, helping to deepen institutional learning and inform future operations. On the Integrity Function, CEIU advanced investigative work on the first cases of project-related Prohibited Practices and contributed actively to international knowledge exchange through various integrity and anti-corruption forums.

To mark the transition in leadership and set the tone for the year ahead, CEIU convened a two-day team retreat in December 2024. This retreat provided space for reflection, strategic planning and team building, reinforcing our collective vision and commitment to the Unit's mandate.

As Acting Managing Director, I am committed to continuing CEIU's work with professionalism, independence, and purpose. I look forward to building on the achievements of 2024 and to working with all our partners across the Bank and beyond to ensure that CEIU continues to add value to AIIB's operations.

**Hwee Tin Kng**

Acting Managing Director, CEIU and Chief Internal Audit Officer, Internal Audit Office







# JOINT MESSAGE

We appreciate the opportunity to highlight the strategic importance of the engagement of the Board of Directors (the Board) with the Complaints-resolution, Evaluation, and Integrity Unit (CEIU), as reflected in this Annual Activity Report.

The Audit and Risk Committee (ARC) and the Policy and Strategy Committee (PSC) are entrusted with critical responsibilities in the governance of AIIB—providing oversight on risk, institutional integrity, policy alignment, and strategic direction. CEIU's independent role, mandate, and evolving work program are integral to this shared governance function.

Throughout the year, our Committees worked with CEIU to ensure alignment with AIIB's broader strategic objectives and risk management frameworks. The revised Terms of Reference for CEIU, finalized in 2024, marked a significant milestone in reinforcing the Unit's mandate. It reaffirmed the importance of CEIU's independence while enabling more meaningful engagement with the Board and Management on key institutional matters. Equally important was CEIU's presentation of its first Three-Year Rolling Work Program, which facilitated a more structured and forward-looking dialogue on strategic priorities, resource planning, and institutional risk.

The Board's involvement has been particularly impactful in areas such as the review of the Project-affected People's Mechanism (PPM), the delivery of CEIU's first thematic evaluations, and the ongoing development of AIIB's integrity infrastructure. These engagements have contributed to a shared understanding among Directors of how CEIU's work strengthens the Bank—not only by enhancing safeguards and oversight but also by shaping how AIIB learns and evolves as a modern multilateral development bank.

As Chairs of ARC and PSC, we commend CEIU's leadership and professional staff for their consistent delivery of high-quality work carried out with independence, clarity, and professionalism. We also acknowledge the Unit's deepened engagement with the Committees, which has enriched Board deliberations and further aligned CEIU's priorities with the Bank's strategic direction.

Looking ahead, we remain committed to supporting CEIU's continued development as a cornerstone of AIIB's institutional governance. CEIU's contributions are critical to upholding the integrity of the Bank's operations and advancing the principles of transparency, evidence-based decision-making, and responsiveness to affected people—principles that are essential to maintaining the trust of AIIB's Members and stakeholders as the Bank enters its second decade.

**Craig Murphy**

Chair, Audit and Risk Committee

**Junhong Chang**

Chair, Policy and Strategy Committee





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# INTRODUCTION

1. The **Complaints-resolution, Evaluation and Integrity Unit (CEIU or the Unit)** was established in 2016 as an independent unit within the Asian Infrastructure Investment Bank (AIIB or the Bank). 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.

2. This Annual Activity Report presents a comprehensive overview of CEIU's key achievements and contributions in 2024. It reflects CEIU's strong commitment to promoting transparency, accountability, and learning across AIIB operations. Through its independent work, CEIU continues to serve a wide range of stakeholders—including the Board, AIIB Management and staff, clients in Members, private sector partners, peer institutions, and the broader public—by generating evidence that informs decision-making and enhances development effectiveness.

## Core Functions of CEIU

3. In line with its updated **Terms of Reference** approved by the Board in March 2024, CEIU delivers on its mandate through three core and interrelated functions:

- **Complaints-resolution Function:** implementation of the Project-affected People's Mechanism (PPM), AIIB's complaints-handling mechanism regarding compliance with the **Environmental and Social Policy (ESP)** of the Bank.
- **Learning and Evaluation Function:** evaluative assessment of AIIB's ordinary and special operations in accordance with the **Learning and Evaluation Policy (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

4. Grouping these three functions under CEIU allows for greater synergy, supports the Bank's corporate learning and accountability culture by deriving findings and lessons across all three functions, which are shared with AIIB Management as inputs to the continuous improvement of Bank policies and practices, and supports the Board in its supervisory role. CEIU may also offer independent input to the Board and the President when Management formulates or reviews operational policies and strategies, or as otherwise outlined in the Board-approved CEIU Work Program. CEIU exercises its relevant functions independently of Management while ensuring that CEIU remains engaged with and contributes to attaining the overall objectives of AIIB. In addition, the activities of the CEIU underlines vis-à-vis the Bank's external stakeholders at large, including the public and people affected by the Bank's activities, its commitment to learning and accountability.

## Engagement with the Board

5. As a Board-reporting unit, CEIU provides regular updates to the Board ensuring transparency and alignment across institutional functions. The Board oversees AIIB's Management through its review of reports covering all areas of the Bank's operations.

6. Three standing committees support the Board in fulfilling its supervisory responsibilities: the Audit and Risk Committee (ARC), the Budget and Human Resources Committee (BHRC), and the Policy and Strategy Committee (PSC). CEIU engages directly with these committees in the course of its operations, providing tailored reporting on its three core functions. This structured engagement ensures that CEIU's independent oversight contributes meaningfully to the Bank's governance, policy formulation, and institutional learning. Specifically:

- Project complaints received through the PPM and Evaluation-related reports and issues are reported to the PSC.
- Integrity issues related to projects are reported to the ARC.

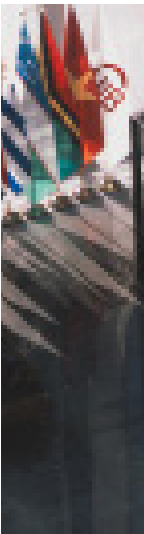
### Strategic Objectives and Priority Actions


7. In 2024, CEIU advanced a clear set of strategic objectives aligned with its mission and vision, anchored by four cross-cutting priorities that guide all areas of its work. These include:

- i. Ensuring the design and delivery of high-quality products, services, and strategic insights to promote internal and external accountability and learning, fostering an AIIB results-oriented culture, and supporting AIIB's decision making on projects, policies, strategies, and related processes.
- ii. Developing 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.
- iii. Advancing 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.
- iv. Building 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.

These goals also serve as the foundation for CEIU's function-level objectives and key priority actions across its three core functions.

- For the Complaints-Resolution Function, top priorities include finalizing the Project-affected People's Mechanism (PPM) Policy review, expanding services such as dispute resolution and investigations with the goal of developing the 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.
- For the Learning and Evaluation Function, CEIU will deliver Project Learning Reviews (PLRs) for both sovereign and non-sovereign financing and developing higher plane evaluations that are disclosed with the goal of building 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.



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- For the Integrity, Anti-Fraud and Corruption Function, CEIU aims to prioritize delivery of cases to test the full range of the Integrity infrastructure from investigation, sanctions and appeals with the goal of ensuring accountability, advancing integrity in AIB projects and activities, and leading AIB's anti-corruption agenda.

### Work Plan and Budget

8. CEIU's Annual Workplan and Budget are presented to the Board as a separate appendix to AIB's annual Business Plan and Budget.
9. The 2024 Workplan included activities confirmed by CEIU's Managing Director for the year, which aligned with the Bank's corporate strategy and were guided by CEIU's Strategic Directions Paper, which included its Priority Actions for each of the three functions.
10. In addition, for the first time, CEIU submitted a *CEIU Work Program 2025-2027* to PSC in December 2024, which will be adjusted annually within the Bank's business planning process.
11. CEIU's budget is a separate line item in the Bank's budget. CEIU's budget is discussed with Management and is approved by the Board as part of the Bank's overall budget approval process. In 2024, CEIU's budget utilization was at 74%—a major improvement from a 33% budget utilization in 2023—driven by growth in activities across all three functions.

### Leadership Transition, Staffing and Team Development

12. In 2024, CEIU was led by Marvin Taylor-Dormond, who provided strategic direction and oversight across the Unit's core functions. In anticipation of his **resignation effective December 31, 2024**, AIB President Jin Lique, in consultation with the Board, appointed Hwee Tin Kng as **Acting Managing Director on December 17, 2024**, to ensure continuity in advancing CEIU's vision and strategic priorities. Kng concurrently serves as Chief Internal Audit Officer of AIB, bringing extensive institutional knowledge and leadership experience to her interim role. AIB has already initiated the process for recruitment of an MD-CEIU, which is expected to be completed in 2025.
13. As of December 31, 2024, CEIU has eight staff members—seven professionals and one support staff. Five of the professional positions were filled in 2024. Recruitment of two professionals for the Complaints-resolution and Evaluation functions are ongoing, with completion planned in 2025. There were also two resignations in Q4 2024 (two outsourced administrative staff), whose replacements will be onboarded in Q1 2025. CEIU is on track with the hiring of additional staff resources as articulated in its Strategic Direction Paper.
14. To support its 2024 operations, CEIU also engaged the services of 17 short-term consultants who supported the Unit for short-term and specific tasks across the three functions. These additional temporary resources allowed CEIU to deliver on its 2024 work program while being consistent with AIB's "lean" model of operations.



15. In December 2024, a two-day Unit retreat provided a valuable opportunity for the CEIU team to reflect on past achievements, strategize for the future, and prepare for the upcoming leadership transition. The retreat also fostered team-building and informal exchanges, strengthening relationships within the growing team and reinforcing a shared vision for the year ahead.



CEIU staff members (from left): Marla Hinkenhuis (Analyst), Lorenzo Vertemati (Analyst), Yuan Chang (Executive Assistant), Eskender Zeleke (Head of Independent Evaluation), Hwee Tin Kng (Acting MD-CEIU and Chief Internal Auditor), Marvin Taylor-Dormond (Former MD-CEIU), Yin (Annie) Yau (Senior Integrity Specialist), Shamas ur Rehman Toor (Head of PPM Secretariat and Complaints Resolution), Andrew Mendoza (Head of Integrity). Not in photo: Jiaqi Zhao (Analyst).

# HIGHLIGHTS OF 2024 CEIU ACTIVITIES

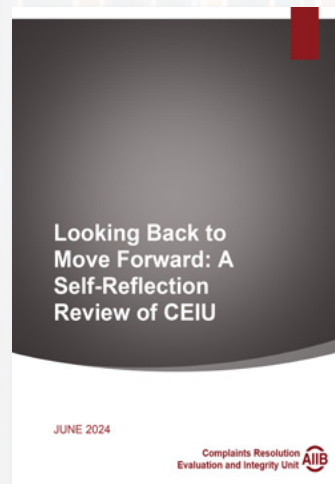
16. In 2024, CEIU undertook several strategic initiatives to enhance its institutional effectiveness, governance alignment, and forward planning.

17. **Revising CEIU's Terms of Reference (TOR) to Reflect Evolving Mandates and Institutional Learning:** CEIU revised its Terms of Reference (TOR) to reflect evolving operational needs and expectations, and in consultation with Management. Specifically, the new TOR reflects the practices and lessons gained by CEIU over the last years and include:

- a. An updated articulation of the purpose of CEIU in line with recent Board approved documents.
- b. The updated role of CEIU as articulated in the LEP (Learning and Evaluation Policy), including better articulating its role in the review of operational policies and strategies.
- c. Affirmation of the access by CEIU to AIIB staff and documents as relevant to its functions.
- d. Affirmation of the independence of CEIU staff from instructions by management regarding the independent conduct of the CEIU functions.

The **new TOR** was disclosed publicly on AIIB's website on January 27, 2024.

18. **Charting a Path Forward:** In June 2024, CEIU presented two papers to the Board—the **Self-Reflection Exercise Paper** and **Strategic Directions Paper (2024-2030)**—aimed at giving direction to the work and development of the Unit. The Board sought further details on the findings of the Self-Reflection review and emphasized the importance of an effective CEIU. The two products were publicly disclosed on AIIB's website on June 28, 2024.





19. **Launching a Forward-Looking Agenda-CEIU Work Program 2025-2027:** As specified in the updated TOR, CEIU developed its Work Program 2025-2027 in consultation with AIIB's Management, and presented it to the PSC. The Work Program includes all planned activities for 2025 as well as an outline of planned activities for 2026 and 2027, which will be reviewed yearly as part of the regular Business Plan and Budget planning process.

20. **Strong Performance in Inaugural Audit of CEIU Resource Management:** The first audit of CEIU resource management activities (staffing plan, budget, and procurement activities) by AIIB's Internal Audit Office was completed in early 2024. CEIU's rating was "Good" indicating proper control of risks and processes in staffing plan, budgeting and procurement activities.

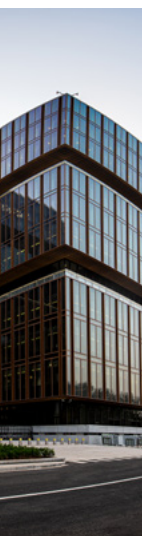
21. **Advancing Accountability-Key Milestones in Complaints-resolution:** The **PPM Policy**, adopted by the Board on December 7, 2018, mandates a review no later than five years from its adoption (PPM Policy, Clause 11.4). CEIU initiated the **PPM Policy Review** in 2023 and achieved important milestones in 2024, including completing an External Review with findings shared with Management and the Board; conducting wide-ranging consultations with external and internal stakeholders across the globe; and presenting key findings to the Board during AIIB's Ninth Annual Meeting in Samarkand, Uzbekistan. The PPM review is expected to be completed in 2025.

22. **Strengthening Learning and Accountability Through Evaluations and Project Reviews:** The Evaluation Function completed the first two thematic evaluations and the first two Project Learning Reviews (PLRs) of closed projects. The thematic evaluations covered AIIB's **Delegated Project Approval Process** and the **Midterm Assessment of AIIB's Corporate Strategy**, providing key independent insights for AIIB's future development. The PLRs are a key tool for accountability and actionable learning from closed projects. The **PLR report for the Gujarat Rural Roads Project** (India), AIIB's first stand-alone project in the roads sector, was presented to the PSC in December 2024 and subsequently published on AIIB website. The second PLR for the Duqm Port Commercial Terminal and Operational Zone Development (Oman) was also completed in 2024 and will be presented to the PSC in March 2025.

23. **Upholding Integrity Standards and Elevating AIIB's Role in the Global Anti-corruption Community:** The Integrity Function launched three investigations into project-related Prohibited Practices in August 2024 and completed the investigation of two cases by December 31, 2024, with submission to the Sanctions Officer in Q1 2025. In addition, CEIU's efforts resulted in AIIB being awarded the hosting duties for the **25th Conference of International Investigators (CII)** to be held in November 2025. This highly technical and specialized conference will bring together more than 200 heads of investigations offices and participants from more than 60 international organizations.

24. **Building Awareness and Capacity Through Induction and Targeted Training:** In 2024,





MD-CEIU Marvin Taylor-Dormond speaks about the Unit's mandate, structure, and functions during one of the Induction sessions in 2024.

CEIU made presentations on its mandate, structure, and functions to approximately 125 recently hired Bank Personnel during the AIIB Induction Program. In addition, CEIU's three functions delivered separate training courses to 85 new Bank Personnel as part of AIIB's Operational Training Program 1 (OTP 101). Through these courses, CEIU continues to help shape the Bank's culture of learning and accountability.

**25. Deepening Engagement with Civil Society, External Partners, and other stakeholders:**

In 2024, CEIU strengthened its outreach and collaboration efforts to foster greater transparency, learning, and trust. During AIIB's Annual Meetings, CEIU's Complaints-resolution Function hosts a dedicated forum for CSOs, providing a platform for dialogue on issues of mutual interest. CEIU's Evaluation Function participated in various discussions on climate action at the COP29 MDB Pavilion held in Baku, Azerbaijan. CEIU's Integrity Function participated in four capacity-building activities and six outreach efforts with external partners throughout the year including its active roles at the 24th CII held in Manila, Philippines. These efforts reflect CEIU's ongoing commitment to engaging stakeholders and strengthening accountability.

**26. Fostering Knowledge Exchange Through Practitioner Dialogues:** CEIU continued to invite experts from counterpart units in other international organizations to discuss the latest developments in the fields of evaluation and accountability with selected AIIB staff. These dialogues contributed to internal capacity building in AIIB and inspired innovative approaches to CEIU's work.







# COMPLAINTS- RESOLUTION



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

28. In 2024, the **Complaints-resolution** Function primarily focused on the **PPM Policy Review** following the **Roadmap** endorsed by the PSC in December 2023 and an **Approach Paper** that was discussed at the Board meeting in March 2024. The function received and handled five submissions directly and 14 submissions from peer IAMs and continued to conduct outreach activities for internal and external audiences.

## Project-affected People's Mechanism (PPM) Policy Review

29. **Background of the PPM Policy Review:** CEIU started the PPM Policy Review in 2023. The objective of the PPM Policy Review is to assess the effectiveness of PPM and make recommendations to the Board for enhancing PPM's visibility, accessibility, and responsiveness to Project-affected people, and AIIB's accountability. The Review is mandated by the PPM Policy (para. 11.4) and offers an opportunity to reflect on PPM's five-year operational experience.

30. CEIU achieved significant milestones in the PPM Policy Review during 2024.

- **Roadmap and Approach Paper:** A comprehensive Roadmap outlining the steps for reviewing the PPM Policy was endorsed by the PSC in December 2023. The approach emphasized inclusivity, with input from a diverse range of stakeholders. In March 2024, the Board discussed the PPM Review Approach Paper which is published on the **AIIB PPM Policy Review** page.



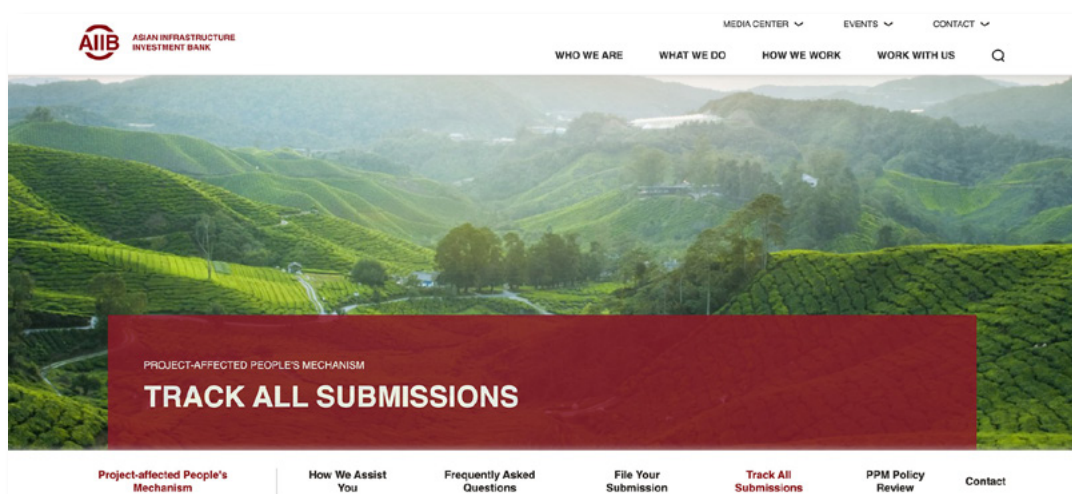
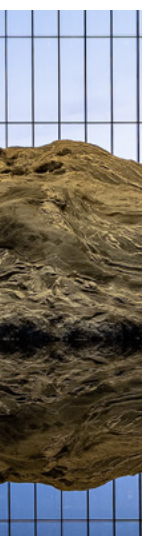
Shamas ur Rehman Toor (left), Head of PPM Secretariat and Complaints Resolution, AIIB, at the PPM Policy Review consultation with CSOs in Islamabad, Pakistan (August 2024)

- **PPM External Review:** The External Review of PPM Policy conducted by an independent expert was one of the several inputs to PPM Policy Review. Its findings were shared with both the Board and Management, and the **report** has been disclosed to the public in May 2024. The external review is one of several inputs to the MD-CEIU in guiding the PPM Policy Review.
- **Board Engagement:** CEIU presented Key Findings of PPM Policy Review to the Board in a retreat organized in September 2024 during AIIB's Annual Meeting in Samarkand, Uzbekistan. A second Board retreat on the PPM Policy Review will be organized in March 2025. The presentation of the Final Review Report to the Board is scheduled for the first semester of 2025.
- **Stakeholder Consultations:** PPM launched in-person consultations on the PPM Policy Review with civil society organizations (CSOs) and peer IAMs during the World Bank-International Monetary Fund (WB-IMF) Spring Meetings in Washington, DC in April 2024. During the rest of 2024, CEIU conducted extensive in-person and virtual consultations with internal and external stakeholders.
  - » In-person consultations were held with AIIB Members, clients and CSOs in Brazil, China, India, Indonesia, Pakistan, Türkiye and Uzbekistan.
  - » In-person consultations with peer IAMs and CSOs were also held in Europe, South Asia, and South and North America.
  - » Virtual consultations were held with AIIB clients and CSOs from Central Asia, South Asia, Southeast Asia, Latin America, Middle East and North Africa, and Sub-Saharan Africa regions.
  - » CEIU also regularly engaged with six peer IAMs undergoing periodic policy reviews. CEIU convenes these meetings regularly to discuss updates, emerging issues, and lessons learned among IAMs.



PPM Policy Review consultation with clients at the Tarbela 5 Hydropower Extension Project in Pakistan (August 2024)





## Handling of Submissions

31. **Submissions Directly to PPM:** CEIU received, processed and managed five submissions in 2024. Each submission was reviewed in line with the PPM Policy and established protocols to uphold fairness and transparency. All submissions were declared ineligible:

- Three were ineligible because the co-financiers' respective Independent Accountability Mechanisms were responsible for handling the complaints.
- One was declared ineligible because the submission was made by a single requestor.
- One was ineligible because the requestors did not make good-faith efforts to resolve issues through Project-level Grievance Redress Mechanism (GRM) and Management.

More details on the submissions are available on AIIB PPM's website: [Track All Submissions - Project-Affected People's Mechanism](#). CEIU has received a total of seven submissions since its inception.

32. **Submissions received by IAMs of Co-financiers:** Complaints alleging noncompliance of ESP in co-financed projects are dealt with by co-financiers. As of December 31, 2024, IAMs of co-financiers received 41 submissions on 10 projects co-financed with AIIB. Fourteen of these submissions were received in 2024. PPM works closely with co-financiers IAMs to monitor the status of these submissions.

## Outreach and Engagement

33. **Practitioner Dialogues:** In 2024, CEIU's Complaints-Resolution Function continued with its regular outreach events aimed at increasing awareness with both internal and external shareholders. CEIU organized two Practitioner Dialogues on topics related to PPM.

- **Lessons Learned on Cases Handled by the European Investment Bank's Complaints Mechanism (EIB CM): Bangalore Metro Rail Project (February 2024)** by Philipp Koenig, the Head of Dispute Resolution of the EIB CM.



Janine Ferretti, IFC CAO Director-General, presents insights and lessons on the Bridge International Academies Case (November 2024)

- **Bridge International Academies Case: Insights and Lessons from Compliance Advisor Ombudsman's (CAO's) Investigation and Dispute Resolution (November 2024)** by Janine Ferretti, the Director-General of the International Finance Corporation (IFC) CAO.

34. **Staff Training:** CEIU Complaints-Resolution Function continued to deliver regular Operational Training Programs (OTP 101) organized by AIIB's Human Resources Department. During 2024, two trainings were delivered to AIIB staff.

35. **Engagement with peer IAMS and CSOs:** CEIU scaled-up its engagement with peer IAMS and CSOs through intensive consultations during the PPM Policy Review and through interactions during the AIIB Annual Meetings, WB-IMF Annual Meetings and IAMnet Annual Meetings.

- **Workshop in Kenya:** In June 2024, co-organized with eight peer IAMS a workshop for CSOs from Eastern Africa Region in Nairobi, Kenya. The two-day workshop titled "Strengthening Accountability and Access to Remedy for Project-Affected Communities" brought together over 50 representatives from nine IAMS and seven CSOs in-person and online.
- **Conflict Resolution Day:** In October 2024, co-organized with five peer IAMS "Conflict Resolution Day" at the IFC headquarters in Washington, D.C. The roundtable discussion was attended by 43 in-person and online participants from CSOs, peer IAMS and mediators. Approximately 200 people visited the multimedia exhibition in the IFC headquarters and engaged in interactive activities.
- **Virtual Outreach:** In December 2024, CEIU and six peer IAMS organized a Massive Open Online Seminar (MOOS) for the Latin American Region. Theme of this event was "Right to Complain: Redress Mechanisms for Internationally Financed Projects." The seminar attracted considerable traffic during the live event. Posts shared in popular social media sites on LinkedIn, Facebook and YouTube also garnered significant attention.
- **IAMnet Annual Meetings:** In October 2024, CEIU participated in the IAMnet Annual Meeting in Manila, Philippines. CEIU also participated in various standing and ad hoc working groups of IAMnet.

# LEARNING AND EVALUATION



36. The **Learning and Evaluation** Function contributes to AIIB's continuous improvement and strong learning culture with its targeted evaluations covering AIIB's investment projects, policies, strategies, and procedures. When conducting its evaluations, the Function combines independence with strong and proactive stakeholder engagement, both within AIIB and with external counterparts. To fulfill its dual mandate of fostering accountability and promoting learning, the Learning and Evaluation Function is committed to delivering credible, timely and impactful evidence for AIIB's continuous effectiveness.

37. In 2024, the Learning and Evaluation Function produced two thematic evaluations on key bank-wide topics, conducted its first two Project Learning Reviews (PLRs) providing actionable project insights, and finalized one Early Learning Assessment (ELA). In addition, the Function continued its training activities, strengthened AIIB's engagement in the OECD/DAC Evaluation Network and with peer MDB evaluation functions, and expanded its external outreach. The specific activities conducted in 2024 are as follows.

## Thematic Evaluations

38. **CEIU delivered the first two Thematic Evaluations.** Thematic Evaluations are independent evaluations to inform the Board, Management, and external stakeholders on strategic, corporate, policy and thematic issues critical to AIIB's evolving mandate. These provide structured assessments and highlighted lessons and recommendations for AIIB. Thematic Evaluations are discussed in the PSC and publicly disclosed on the AIIB website.

- **Independent Review of AIIB's Delegated Project Approval Process.** Following AIIB's **Accountability Framework** and since 2018, the authority to approve financing projects has been delegated to the President, and CEIU's evaluation assessed the effectiveness, quality, and governance implications of this process. The review found that delegated approvals have become increasingly utilized and, in general, are aligned with the established eligibility criteria. Comparative analysis revealed no material differences between delegated and Board-approved projects in terms of strategic alignment, quality at entry, and early implementation performance.

The evaluation provided valuable forward-looking recommendations to strengthen the effectiveness of the Accountability Framework. These included improving information flows to the Board, enabling real-time pipeline visibility, and clarifying exceptions to delegation—offering critical insights for upcoming Board deliberations. The thematic evaluation was discussed in the PSC and published on AIIB's website.





- **Independent Midterm Assessment of AIIB's Corporate Strategy.** AIIB's Corporate Strategy (CS), approved in September 2020, was designed to advance the Bank's mandate of fostering sustainable infrastructure, regional connectivity and development. The CS included the requirement for a midterm review, that was initiated by AIIB Management in 2024.

CEIU conducted an independent midterm assessment of the CS to support the Board with evidence on relevance, effectiveness and alignment of the CS with AIIB's core mandate. This thematic evaluation highlighted AIIB's successes, such as its rapid COVID-19 pandemic response, while identifying challenges such as the growth in core infrastructure investments and the strengthening of the result orientation of the Corporate Scorecard. It called for greater private sector involvement and clearer indicators to measure the Bank's impact on less-developed Members. It also provided forward-looking recommendations to sharpen AIIB's strategic focus and ensure its continued relevance in shaping tomorrow's infrastructure.



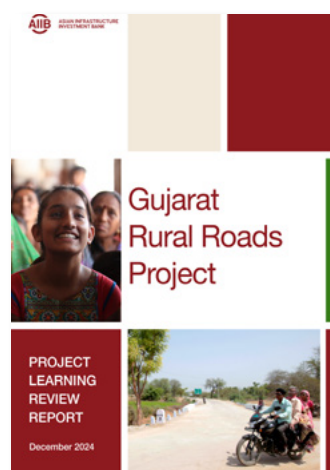
39. **In 2024, CEIU began preparations for its 2025 Thematic Evaluation of AIIB's COVID-19 Crisis Recovery Facility (CRF).** AIIB established the CRF to support its Members and clients in alleviating economic, financial and public health pressures arising from COVID-19. The CRF provided USD18.5 billion in support before closing on December 31, 2023. As requested by Board members, CEIU will conduct an ex-post evaluation of the CRF in 2025, focusing on the outcomes of CRF projects and learning for the future of AIIB.

### Project Learning Review (PLR)

40. **CEIU conducted AIIB's first two independent project evaluations.** PLRs are independent evaluations of completed projects. The main purpose of the PLR is to identify the results achieved by the project, understand their drivers, and obtain lessons for the continuous improvement of the Bank's projects and processes. The PLR assesses the performance of the project based on OECD/DAC (Organisation for Economic Co-operation and Development/ Development Assistance Committee) criteria as well as the performance of the Bank and Client. PLRs are discussed in the PSC and publicly disclosed on the AIIB website.

- **PLR 1: India: Gujarat Rural Roads Project (GRRP).** The GRRP was AIIB's first stand-alone financing in the roads sector, making it a unique project for AIIB. Approved in July 2017, AIIB provided a USD329 million loan to support the Government of Gujarat's Chief Minister's Rural Roads Program. The project aimed at improving rural road connectivity for approximately 4,000 villages across 33 districts, enhancing access to services and fostering economic growth.

The PLR assessed the GRRP as relevant, as the project addressed critical rural connectivity needs in Gujarat while aligning with both national and state priorities and AIIB's strategic focus on infrastructure development.





The GRRP was found to be effective, exceeding its targets for village connectivity and benefiting approximately eight million people. The project demonstrated efficiency through adequate economic returns, cost savings, and timely implementation. The project outcomes are likely sustainable due to the institutional and financial capacity of the client. AIIB's Work Quality was rated Satisfactory, reflecting its responsive and flexible approach, although challenges related to staff turnover and monitoring were noted. The Client's Work Quality was rated Highly Satisfactory. In conclusion, the GRRP was overall rated as successful. Based on this assessment, the PLR identified key issues and lessons and presented six recommendations. The PLR Report for the GRRP was presented to the PSC in December 2024 together with the Management Response. The PLR report and the Management Response were disclosed together on AIIB's website.

- **PLR 2: Oman: Duqm Port Commercial Terminal and Operational Zone Development Project ("Duqm Port Project").** The Duqm Port Project was approved in December 2016, marking AIIB's second stand-alone financing and its first financing in port development. AIIB provided USD265 million loan to the Public Authority for Special Economic Zones and Free Zones of Oman for the construction of necessary infrastructure for the commercial terminal. The objective of the Project was to enhance the potential economic benefits from developing Duqm Port by improving transport efficiency, strengthening logistics, facilitating mineral exports and reducing supply chain delivery time and costs. The PLR was finalized in Q4 2024 and shared with AIIB Management. The PLR will be presented to the PSC in March 2025 together with the Management Response.



On-site visits with beneficiaries and stakeholders greatly enriched the findings and outcomes of PLRs.

(Above) Consultation with project beneficiaries for the Gujarat Rural Roads Project PLR in Gujarat, India (August 2024).

(Right) Stakeholder interview for the Duqm Port Project PLR in Duqm, Oman (September 2024).



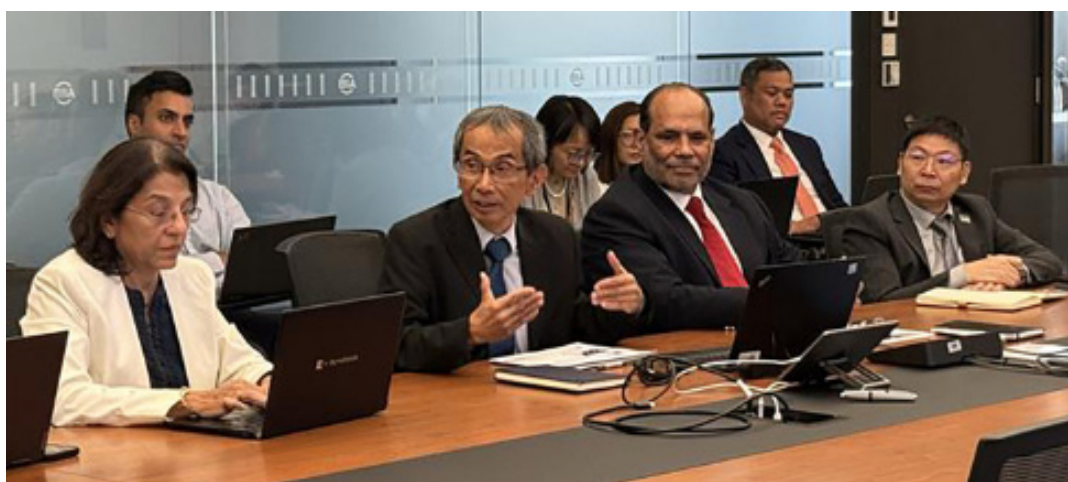
## Early Learning Assessments (ELA)

41. **The Evaluation Function presented one ELA to the PSC in Q1 2024.** The Evaluation Function undertook the preparation of the first ELA of an AIIB financing approved through delegation under the Accountability Framework in 2023 - the Osmangazi Electricity Distribution Network Modernization and Expansion Project. The report was concluded and discussed by the PSC in March 2024 to provide insights toward the update of the AIIB Accountability Framework in 2024.

## Outreach and Engagement

42. **Practitioner Dialogues.** The Evaluation Function hosted three sessions with high-level evaluation experts from peer MDBs, discussing findings from recent evaluations with AIIB staff.

- **Dialogue on “European Bank for Reconstruction and Development’s (EBRD) Experience with Delegated Approval of Financings” (March 2024):** An EBRD Independent Evaluation Department Special Study, featuring Véronique Salze-Lozac’h, EBRD Independent Evaluation Department Chief Evaluator, and Tom Bartos, EBRD Associate Director. EBRD presented evidence from a recent Special Study on Delegated Approval of Financings at EBRD. Their findings and recommendations directly aligned with CEIU’s thematic evaluation of AIIB’s delegated approval process.
- **Dialogue on “Asian Development Bank’s (ADB) Midterm Evaluation of Strategy 2030” (April 2024):** The session featuring Emmanuel Jimenez, the Director General of ADB’s Independent Evaluation Department (IED) provided valuable insights on ADB’s experience as AIIB was conducting its own CS midterm review.
- **Dialogue on “Drivers of ADB’s Country Engagement Approach and Quality” (October 2024):** The discussion featuring Emmanuel Jimenez, Director General of IED at ADB presented key findings and lessons from ADB’s 2024 Annual Evaluation Review explored the factors influencing the nature and quality of ADB’s country engagement and how it supports the achievement of its Strategy 2030 targets.



Featured speaker Emmanuel Jimenez (second from left), ADB IED Director General, at the Practitioner Dialogue, “ADB’s Midterm Evaluation of Strategy 2030” (April 2024)







Climate Evaluation Dialogue at the Joint MDB Pavilion during COP29 (November 2024)

43. **Climate Evaluation Dialogue at COP29:** In 2024, CEIU took a leading role in advancing climate accountability by convening a high-level panel at COP29 in Baku, Azerbaijan. The session, “Independent Evaluation Perspectives on Climate Finance, Policy, and Programs: How Evidence Can Shape Action,” held at the Joint MDB Pavilion, featured contributions from AIIB, European Investment Bank (EIB), ADB, EBRD, and the German Institute for Development Evaluation (DEval), and brought together evaluators, policymakers, and climate finance experts. The panel underscored the role of independent evaluation in enhancing impact, transparency, and learning of climate investments. Building on CEIU’s engagement with the OECD/DAC EvalNet (Network of Development Evaluation) Climate Working Group, the dialogue positioned AIIB as a thought leader in climate-focused evaluation. Given the strong interest and momentum after the session, participants agreed to continue this dialogue at COP30 in Brazil and reinforce the shared commitment to evidence-informed climate action.

44. **Engagement with peer MDB evaluation functions.** The Evaluation Function increased its outreach activities and engaged closely with peer MDB evaluation functions to strengthen ties and improve cooperation:

- **Memorandum of Understanding (MoU) with the EBRD Independent Evaluation Department.** CEIU updated its MOU with EBRD in November 2024.
- **2024 OECD/DAC EvalNet Meeting (Paris, France, June 2024).** The Evaluation Function participated in the 2024 OECD/DAC EvalNet meeting in June 2024 in the OECD HQ in Paris. EvalNet members and observers provided updates on the developments of their evaluation functions and their work plans. CEIU presented its Strategic Directions for 2026-2030 and the evaluations that will be conducted in 2024, which was received by the attendees with great interest.

- **2024 Asian Evaluation Week (AEW) (Shanghai, China, September 2024).** CEIU participated in three high-level panel discussions at the Asian Evaluation Week. AEW is a leading knowledge-sharing platform in the Asia-Pacific region, bringing together government officials, international organizations, and evaluation experts. Jointly sponsored by the Ministry of Finance of the People's Republic of China and ADB's IED, the event focused on the theme of "Innovations for Influential Evaluations."

The panels included representatives from ADB, New Development Bank (NDB), EBRD, Islamic Development Bank (IsDB), International Fund for Agricultural Development (IFAD), and the Brazilian Ministry of Planning. These panels focused on vital topics, including establishing robust evaluation functions, cultivating a culture of accountability, and the transformative role of evaluations in shaping organizational change within multilateral development banks (MDBs). CEIU highlighted AIIB's crucial role in advancing sustainable development in Asia, emphasizing the significance of MDB collaboration in addressing today's interconnected global challenges.



Eskender Zeleke (center), CEIU's Head of Independent Evaluation, at the Asian Evaluation Week in Shanghai, China (September 2024).

# INTEGRITY



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

46. In 2024, the Integrity Function focused on ensuring that allegations of Prohibited Practices were reviewed and investigated, as appropriate. In addition, it continued to provide technical advice on a wide variety of integrity, anti-corruption, and debarment-related matters, as part of its Prevention pillar. Also significant to the work of the Integrity Function were its internal and external awareness raising activities, participation in major anti-corruption events and meetings, continued collaboration with peer MDBs to ensure alignment with international best practices in anti-corruption. This section discusses the specific activities completed in 2024.

## Review of Complaints and Investigation into Prohibited Practices

47. **Forty-Four Reports of Prohibited Practices.** CEIU received 44 new reports on Prohibited Practices, of which 35 were registered for further assessment as Integrity-related complaints after initial screening. The remaining nine reports that were not registered as Integrity-related complaints included inquiries of policies by external parties, external audit and security test messages from AIIB departments, and spam. The increase in complaints received in 2024 versus prior years appears to be a result of CEIU's increased outreach, the increase in project procurement activities, and reporting from Bank Personnel.

48. **Twenty-Seven Complaints under Intake Phase.** Following review of Integrity-related complaints at the Intake Phase, 27 cases were closed because they either: (i) did not allege any Prohibited Practice; (ii) lacked credibility, materiality or verifiability; and/or (iii) are matters that fell under the jurisdiction of other AIIB functions including the project teams.





49. **Three Cases under Investigation Phase.** CEIU converted three active complaints into investigations of Prohibited Practices concerning AIIB-funded projects in Uzbekistan and Bangladesh. Two case investigations were completed in 2024. The final reports will be submitted to the Sanctions Officer in Q1 2025.

50. **At the end of 2024, nine complaints are ongoing review at Intake Phase, and one investigation remains ongoing.**

### Reports of Prohibited Practices in Co-financed Projects

51. **Three Complaints Received by Co-Financiers.** Pursuant to the provisions under the Co-financing Framework Agreements between AIIB and other MDBs, the lead co-financier will inform AIIB of credible allegations of Prohibited Practices, take the lead in any inquiry or investigation, and notify AIIB the findings of its investigations. In 2024, AIIB received information on three complaints of Prohibited Practices from lead co-financiers. Two of the three complaints were closed by the co-financier due to lack of verifiability and materiality. One complaint is under review by CEIU. CEIU continues to work with co-financiers in ensuring that reports received by these organizations are reported to CEIU on a regular basis.

52. **Three Case Investigations by a Co-Financier.** A lead co-financier notified CEIU of three investigations into Prohibited Practices in three co-financed projects in Bangladesh, India and Pakistan. The investigations in Bangladesh and India have been completed, while the investigation in Pakistan remains ongoing. AIIB funds were not used in financing the specific contracts being investigated by the lead co-financier.

### Integrity Risk Reviews

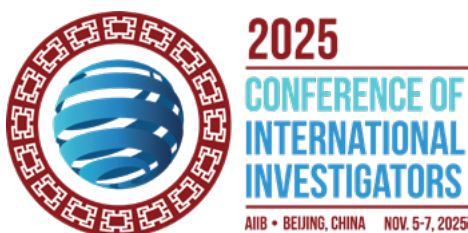
53. As part of its advisory role, **CEIU completed 171 engagements for review of integrity-related matters and compliance to the PPP**, which represents a 47% increase in the number of engagements from 2023. This increase appears to be connected to the increase in the number of projects under preparation and under implementation. Specifically, the engagements include:

- 68 engagements for the review of project, financing, legal and procurement documents and debarment issues;
- 84 engagements for the review of Capital Call Notices; and
- 19 engagements for corporate-related matters.

### 25th Conference of International Investigators (CII)

54. **CEIU led the efforts in getting AIIB selected to host the 25th CII in 2025.** Established in 1999, CII is the premier forum for investigators of international organizations to exchange ideas, discuss integrity issues, address challenges in fighting fraud, corruption, and other wrongdoing, elaborate on new developments and share leading practices. There are currently over 60

international organizations from MDBs, United Nations (UN) agencies, and other international organizations, who participate in the CII. For AIIB, hosting CII will help establish its leadership role in the investigation space for international organizations. CEIU will deliver the CII2025 together with AIIB's Ethics Office. CEIU handles investigation into





allegations of Prohibited Practices in AIIB funded projects and activities while the Ethics Office handles investigation into staff misconduct. The event will take place at AIIB's Headquarters in Beijing, China from November 5-7, 2025.

## Outreach and Engagement

55. **Staff Training.** CEIU delivered the Integrity Operational Training Program 101 (OTP) to 85 new Bank Personnel in 2024, highlighting the importance of the PPP and its role in maintaining the AIIB “clean” as mandated by the Corporate Strategy.

56. **Engagement with peer MDB Integrity Functions.** CEIU continues to engage with major international financing institutions and other international organizations to ensure that it remains connected with the community of investigations and integrity professionals, keep abreast in international best practices, and strengthen its position as a leader in this space. Specifically:

- **Meeting with World Bank Integrity Vice Presidency (INT) (April 2024)** to discuss integrity-related matters including AIIB's membership to the **Agreement for Mutual Enforcement of Debarment Decisions (AMEDD)**, integrity arrangements in co-financed projects and other opportunities for collaboration between CEIU and INT.
- **Co-chaired the Heads of Integrity (HOI) Plus (MDB+) Meeting (November 2024)** with ADB. The MDB+ Meeting brought together the investigation and integrity heads of 13 MDBs to discuss matters of shared interest. During this meeting, CEIU led the discussion on “Mutual Reliance on Integrity” as part of the agenda.
- **24th CII (November 2024).** As part of CII 2024 hosted by the Asian Development Bank in Manila, Philippines, CEIU:
  - » **Moderated an Open Floor Exchange (OFE) on “Joint and Parallel Investigations”** where it explored the benefits and opportunities for the investigation models. In addition, CEIU presented the “fully delegated” model of investigation as an alternative model for international organizations.
  - » **Served as an Expert Panelist on an OFE on “Intelligence Cooperation: Sharing Success and Lessons from MOUs”** where Panelists delve into the strategies and best practices for enhancing intelligence cooperation across organizations, in particular, success stories and lessons learned from using Memorandums of Understanding (MOU) with peer organizations and national authorities.
  - » **Conducted several bilateral meetings with other Participating Organizations** to discuss integrity-related matters.



(From left) Head of Integrity Andrew Mendoza, MD-CEIU Marvin Taylor-Dormond, and Senior Integrity Specialist Yin (Annie) Yau at the 24th Conference of International Investigators in Manila, Philippines (November 2024)

57. **Engagement with other Partner Organizations.** CEIU represented AIIB in various international forums to strengthen professional networks in investigation and anti-corruption. Specifically:

- **2024 International Anti-Corruption Conference (Vilnius, Lithuania, June 2024).** CEIU attended this high-level international conference together with representatives from other MDBs' Integrity offices and international organization.
- **CEIU also met with representatives from national investigation authorities** to discuss areas of cooperation on prevention, training, and the possibility of signing an MOU, as appropriate, to facilitate possible referral of information as provided for in the PPP.



Head of Integrity Andrew Mendoza at the 2024 International Anti-Corruption Conference in Vilnius, Lithuania (June 2024)

58. **External Capacity Building.** As part of its anti-corruption prevention role, CEIU continues to represent AIIB in various forums externally to ensure that it provides accurate and sufficient information on its anti-corruption policies, procedures and activities. In 2024, CEIU undertook significant outreach activities to local and internal contractors, partner agencies, and national counterparts, including:

- **A presentation on “Investigation and Debarment in MDBs” as part of the Multilateral Cooperation Center for Development Finance (MCDF) Procurement Workshop in the Middle East and North Africa (MENA) Region (Cairo, Egypt, May 2024).** CEIU addressed topics like the harmonized Prohibited Practices, the investigations and sanctions process of MDBs and answered questions from more than 100 Middle East and North Africa-based contractors, suppliers, consultants and potential project co-investees.
- **A presentation on the “MDBs Perspective on Fighting Fraud and Corruption Through Public and Private Sector Partnerships” as part of the 8th Independent Commission Against Corruption (ICAC) Symposium (Hong Kong, China, May 2024).** The Symposium marked the golden jubilee of the ICAC gathered more than 500 delegates of anti-corruption and law enforcement agencies world-wide, UN agencies, regulators,



MD-CEIU Marvin Taylor-Dormond at the 8th Independent Commission Against Corruption Symposium in Hong Kong, China (May 2024)







compliance professionals and private sector representatives. This was the first time AIIB was invited to speak in this Symposium.

- **A presentation on AIIB’s anticorruption framework and strategy in the Forum on Business Integrity and Compliance for the Belt and Road (Yiwu, China, June 2024).** Organized by Discipline Inspection and Supervision Institute, Tsinghua University, the Forum attracted over 400 participants from national and internal anticorruption agencies, government officials, experts, scholars, industry representatives and United Nations agencies exchanging ideas on business integrity and compliance in China and Chinese business overseas.
- **2nd Asia-Pacific Anticorruption and Integrity Forum (APAIF) (Xiamen, China, August 2024).** CEIU delivered two sessions on “Integrity Pitfalls in MDB Procurement” and “Conflicts of Interest (COI) in MDB Procurement” for more than 200 representatives of local and international contractors. APAIF was co-organized by ADB, the Xiamen National Accounting Institute (XNAI), the MCDF, China International Contractors Association (CHINCA), and Secretariat of Maritime Silk Road Central Legal District to effectively manage integrity risks when participating in MDB-funded infrastructure projects.
- **A presentation on “Investigation and Debarment in MDBs” at ICAC’s Professional Anti-Corruption Training for Major Infrastructure Projects (Hong Kong, China, August 2024)**



(Left) Senior Integrity Specialist Yin (Annie) Yau presents AIIB’s anticorruption framework and strategy at the Forum on Business Integrity and Compliance for the Belt and Road (June 2024)

(Right) CEIU’s Head of Integrity Andrew Mendoza responds to questions at the 2nd Asia-Pacific Anticorruption and Integrity Forum in Xiamen, China (August 2024)



Professional Anti-Corruption Training for Major Infrastructure Projects, ICAC, Hong Kong, China (August 2024)

- A presentation on “Financial Irregularities in MDB Operations” as part of CGIAR’s 2024 Investigations Training Program (Online, September 2024).
- International Anti-Corruption Day (ACD) organized by the Pakistan Centre for Peace and Development Initiatives (CPDI) where CEIU presented on Integrity@AIIB and served as an expert panelist on anti-corruption.

### International Anti-Corruption Day at AIIB

59. CEIU led the annual celebration of International Anti-Corruption Day at AIIB (December 9, 2024) with a series of activities around the theme “Integrity Starts with Me.” Over 200 Bank Personnel and Board officials attended the Keynote Event on “Fighting Corruption in MDBs” featuring Jan Willem van der Kaaij, former Inspector General of EIB. AIIB Acting Vice President and Chief Administration Officer Asma Shaikh delivered the Opening Remarks and joined van der Kaaij and MD-CEIU Marvin Taylor-Dormond in a panel discussion.



Keynote event during International Anti-Corruption Day at AIIB (December 2024)



(Left) Keynote speaker Jan Willem van der Kaaij, former Inspector General of EIB. (Right) MD-CEIU Marvin Taylor-Dormond and AIIB Acting Vice President and Chief Administration Officer Asma Shaikh joins van der Kaaij in a panel discussion.

## Support to AIIB's Sanctions System

60. **CEIU is part of AIIB's Investigation and Sanctions System together with the Sanctions Officer and the Sanctions Panel.** CEIU undertakes investigation into allegations of Prohibited Practices in AIIB-funded projects and activities. The **Sanctions Officer** is responsible for reviewing CEIU investigations for preponderance of evidence and imposing appropriate sanctions against parties that engaged in Prohibited Practices. The decision of the Sanctions Officer may be appealed by a sanctioned party to the **Sanctions Panel**. In 2024, CEIU provided support to AIIB's Sanctions System through the following:

- **Delivered a Presentation to the MDBs First Tier Sanction Officers (FTSO) Meeting (Manila, Philippines, November 2024).** On behalf of AIIB's Sanctions Officer, Ludger Schuknecht, CEIU provided a briefing on AIIB's investigations and sanctions to MDBs represented at the FTSO. This is the first time that AIIB was invited to join this meeting, and another step towards AIIB's goal to be part of the AMEDD (cross-debarment agreement by MDBs).
- **Supported AIIB's Sanctions Officer in managing AIIB's Debarment List.** The Sanctions Officer, based on CEIU's review and recommendation, approved the inclusion of 341 entities (and removal of 166 entities) debarred by MDBs that are part of the AMEDD or cross-debarment agreement to its Debarment List. AIIB's Debarment List includes debarments based on AIIB's own investigation and the foregoing cross-debarred entities. As of December 31, 2024, there were 1,155 entities in AIIB's Debarment List. 85% of these debarments are related to Fraudulent Practices.
- **Participated in the Sanctions Panel Meeting (Beijing, China, November 2024).** CEIU participated in Sanctions Panel coordination meetings and continued to support its agenda. As part of its administrative support to the Sanctions Panel, CEIU provided relevant information and supported engagements of the Sanctions Panel with peer organizations such as the 2024 Conference of Appellate Bodies (London, UK, March 2024) attended by the Chair of the Sanctions Panel and the Secretary.









# CONCLUSION

2024 marked a year of meaningful progress and reflection for CEIU. Beyond delivering evaluations, investigations, and complaint-handling, the Unit strengthened its systems, deepened its stakeholder engagement, and set a strategic course for the future.

A key feature of CEIU's work this year was its emphasis on connection—bridging diverse perspectives from across the Bank, Members, civil society organizations, international peers, and other stakeholders. These exchanges informed both policies and practices in CEIU, reinforcing CEIU's commitment to transparency, institutional learning, and accountability.

Internally, CEIU invested in building a more agile, collaborative team. Externally, it expanded its presence and credibility through participation in conferences and forums, performing and intensifying outreach activities, and exercising thought leadership. These activities help ensure that the work of the CEIU as an independent and engaged entity remains relevant and responsive.

Looking ahead, CEIU is well-positioned to continue supporting AIIB's mission of financing sustainable infrastructure. With strengthened foundations and a forward-looking work program, the Unit remains committed to delivering independent insights, fostering trust, and ensuring that the Bank's operations reflect the highest standards of integrity and responsiveness to affected communities.







ASIAN INFRASTRUCTURE  
INVESTMENT BANK



# 2024 ANNUAL ACTIVITY REPORT

## Complaints-resolution, Evaluation and Integrity Unit

The 2024 Annual Activities Report of the Complaints-resolution, Evaluation and Integrity Unit (CEIU) of the Asian Infrastructure Investment Bank (AIIB) highlights CEIU's achievements in accountability, learning, and integrity. Key milestones include the updated Terms of Reference, strategic planning documents, evaluations, policy reviews, and investigations into Prohibited Practices. The report emphasizes CEIU's commitment to transparency, stakeholder engagement, and continuous improvement across AIIB operations. With expanded outreach and enhanced internal capacity, CEIU reinforces its role as a trusted oversight body supporting sustainable infrastructure development. This report serves policymakers, project beneficiaries, CSOs, and governance professionals seeking insights into effective institutional oversight.

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