

Comparing External Reviewer's recommendations with changes to draft revised Project affected People's Mechanism Policy

| External Reviewer's Recommended Changes to the PPM Policy | Changes in the Draft Revised PPM Policy |
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| Include the notion of Remedy in a section outlining purpose/objective of PPM Policy. | Not adopted |
| Consider including other relevant policies against which AIIB's Compliance is assessed. | Not adopted |
| Remove the requirement of having two or more complainants to file a submission, with flexibility of choice for representation from local and international CSOs. | A revision is proposed to allow for a single Requestor (rather than 2 or more) to file a submission with PPM in cases involving allegations of gender-based violence, sexual harassment or sexual exploitation and abuse. |
| Lower the bar of accessing PPM by amending the requirement of "good faith efforts to resolve the issues with the Project-level GRM and with Management". | No changes to requirement to engage with both Project-level GRM and with Management One new exception included: (b) a failure on the part of Management to engage meaningfully with the Requestors within a reasonable period of time following notice to Management to engage with the Requestors; |
| Remove the judicial clause ("matters concurrently under arbitral or judicial review") restriction for eligibility of submissions for Compliance Review. | A revision is proposed to eliminate the clause on ineligibility of a submission that is under arbitral or judicial review. |
| Remove the requirement of Board Approval for decision to undertake a Compliance Review. Allow self-initiated Compliance Reviews by MD-CEIU and Board subject to specific criteria/conditions. | Not adopted |
| Allow PPM to make recommendations on remedial measures and policy changes subsequent to a Compliance Review. PPM Policy only allows making findings of compliance / noncompliance following a Compliance Review. | Not adopted |
| Provide for PPM to monitor Management Action Plans (MAPs) to verify that remedial actions are | A revision is proposed to provide for independent verification of specific |

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| <p>implemented, including through consulting people to understand from their perspective whether the proposed actions are effectively responding to the harms they are experiencing and not be restricted to reviewing Management monitoring reports. This may be subject to specific criteria/conditions (for example, Board Approval).</p> | <p>measures included in the MAP by PPM under exceptional circumstances and subject to Board approval.</p> |
| <p>Institutional Recommendation: the impact on the eligibility of complaints to the PPM of co-financed projects, of financial intermediary projects and policy-based financing needs to be examined; either (1) abolish the co-financing option that sets forth the non-applicability of the ESP and the non-reliance on PPM for certain co-financed projects, allowing potential complainants to choose the IAM to send their complaint, regardless of whether the project is co-financed or not, or (2) maintain the co-financing option but ensure that a) the list of complaints received by the IAMs of co-financing institutions is public, b) consequences of excluding co-financed projects from the PPM be assessed, c) alternative routes be developed including joint missions in select cases, and d) PPM should engage in closely in such cases and learn from lessons for the benefit of AIIB's policies and their implementation going forward.</p> | <p>New text is proposed to provide that in cases where AIIB excludes the filing of cases in relation to co-financed projects, relies on a co-financier's IAM and that IAM makes a finding of non-compliance, Management would report to the Board on the implications for AIIB and the opportunities for institutional learning resulting from that IAM's findings.</p> |