

INDEPENDENT COMPLAINTS MECHANISM (ICM)

Notice of Admissibility

7 January 2026

ICM complaint 25-014

Procedural History

On 18 November 2025, the Complaints Offices of DEG and FMO received a complaint concerning a company operating in the agri-food and forestry sector (the Company or the Client). The complaint was submitted by an NGO on behalf of affected families and was accompanied by a representation agreement.

The complaint alleges a range of impacts, including inadequate management of resettlement of families in the project area; livelihood and environmental harms; and serious misconduct and violence by company workers—including theft, beatings, sexual assault, intimidation, reprisals against community leaders, and threats to children’s safety and well-being.

On 1 December 2025, the complaint was forwarded by the Complaints Offices of DEG and FMO to the Independent Expert Panel (Panel) of the ICM for an admissibility assessment.

In order to obtain further information necessary for the admissibility assessment, the Panel conducted a virtual meeting with the complainants’ representatives on 12 December 2025. Due to fear of retaliation, the complainants requested the ICM to maintain the confidentiality of their identities. Accordingly, the Panel will not disclose the complainants’ identities or the original complaint documents.

In the interest of procedural fairness and given that the Company has not yet had the opportunity to respond to the allegations at this stage of the process, the Panel has also decided not to disclose the name of the Company or the country of operation at this time. The Panel acknowledges that this represents a departure from its general practice of transparency. The Panel will keep this matter under review and may disclose these details in subsequent communications as the process advances and circumstances allow.

Admissibility Criteria

The Panel assesses admissibility of complaints based on criteria laid out in paragraph 3.1.4 of the 2017 ICM Policy.¹ The ICM Policy requires that (i) DEG and FMO must have or will have an active financial relationship with the Client; (ii) the complaint must contain allegations of (potentially) substantial and (in)direct and adverse impacts or risks; and (iii) there must be an indication of a relationship between the DEG and FMO-Financed Operation and the subject of the complaint. Any allegation of harm that could fall within the ICM Policy must therefore be related to the social, environmental, and human rights standards which the ICM Policy aims to safeguard.

The Panel underlines that a decision to declare a complaint admissible does not imply a view on the merits of the complaint, the alleged harm or on whether the alleged harm has been caused by non-compliances with any policies of DEG and FMO. The admissibility assessment focuses only

¹ The Panel is external to DEG and FMO. It operates independently from the DFIs and is governed by a publicly available policy. See the 2017 ICM Policy of FMO: [Independent Complaints Mechanism](#).

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on whether the complaint falls within the scope of the ICM based on criteria laid out in the ICM Policy. As such, the admissibility decision is based on the allegations in the complaint itself. It is only in the subsequent phases of the ICM process that the Panel turns to verify and assess the allegations through a detailed review including discussions with all stakeholders and review of relevant documents.

The Panel's Assessment

Having carefully reviewed the complaint, the Panel finds the complaint admissible before the ICM. The decision is based on the reasons set out below.

DEG and FMO (collectively, the DFIs) both confirmed that they hold an equity stake in the Company. Therefore, the Panel finds that there is an active financial relationship between DEG and FMO and the Client.

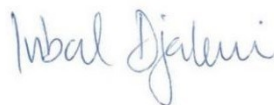
In addition, the Panel notes that the complaint contains allegations of substantial adverse impacts. The allegations mentioned in the complaint fall broadly in the scope of IFC Performance Standards.² The ICM was designed to create accountability and, by extension, to enhance compliance with these social, environmental, and human rights standards in DEG and FMO-Financed Operations. The Panel thus finds that the complaint falls within the scope of the ICM.

Finally, the Panel finds that there is sufficient indication of a relationship between the Financed Operation and the subject of the complaint. The subject of the complaint concerns alleged environmental and social harm as well as violence and threats to community safety, all of which are directly relevant to the IFC Performance Standards. The contracting agreements with DEG and FMO indicate that for as long as the DFIs hold shares in the Company, the Company shall comply with the Environmental and Social Requirements, which include the IFC Performance Standards. Thus, the Panel is of the view that there is sufficient indication of a relationship between the DEG and FMO-Financed Operation and the alleged harm.

In light of the above, the Panel considers that the Complaint fulfils the admissibility criteria. The Panel concludes that this complaint should proceed to the Preliminary Review phase in order to determine the next appropriate steps under the terms of the ICM Policy.



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Inbal Djalovski



Marina d'Engelbronner

² IFC Performance Standards 1 (Assessment and Management of Environmental and Social Risks and Impacts), 3 (Resource Efficiency and Pollution Prevention), 4 (Community Health, Safety, and Security), 5 (Land Acquisition and Involuntary Resettlement), and 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources).