

ICM Policy Revision – Release of revised Complaint Mechanism Policy

DEG aims to achieve sustainable development by applying its environmental and social policies in its investments. Nevertheless, during the course of an investment, projects may have adverse impacts on the environment and on people, including communities, workers, and other affected stakeholders. The Independent Complaints Mechanism (ICM) ensures the right to be heard for complainants who believe they have been, or may be, adversely impacted by our financed operations, and it seeks to address harms that may have occurred.

The ICM is a joint initiative of DEG, FMO, and Proparco (DFIs). The DFIs are committed to regularly reviewing and, where necessary, updating the ICM Policy to ensure it remains robust, effective, aligned with good practices, accessible, and properly structured to guide the complaints process, while serving the needs of stakeholders as intended.

A collaborative and consensus-driven policy revision process:

The DFIs and the Independent Expert Panel (the “Panel”) led a multi-year, expert-facilitated, and consultation-driven revision of the ICM Policy, working collaboratively from the initial 2022 review through extensive stakeholder engagement and consensus-oriented drafting. Following a formal public consultation process in 2025, the jointly prepared final ICM Policy was endorsed or acknowledged by the DFIs in December 2025. See [The ICM Policy Review & Update - ICM PUBLIC CONSULTATION](#) for more information on the process that was followed.

Key improvements:

The revised ICM Policy introduces clearer and more predictable processes and timelines aligned with similar accountability mechanisms; strengthens operational independence by replacing DFI-based complaints offices with a fully independent, three-member Panel supported by dedicated staff; and ensures consistent budgeting, reporting, and governance through a single website and an empowered Panel Chair. It expands the mechanism’s functions to include advisory and outreach roles, introduces a formal deferral option for early resolution, clarifies the treatment of financial intermediaries, and establishes time-bound monitoring tied to management action

plans. Overall, the final policy shows strong alignment with international standards and enhanced independence.

Implementation and Panel Chair appointment:

The revised policy is in effect as of 1 March 2026, after which all newly submitted complaints will be handled under the updated policy. With this transition, the DFIs are also introducing a Panel Chair role. The DFIs are pleased to announce that [Dr. Marina d’Engelbronner-Kolff](#), a current Panel Member, has been appointed as the Panel Chair.

In her role as Panel Chair, Dr. d’Engelbronner-Kolff will continue to serve as a Panel Member while assuming additional representational, operational, and managerial responsibilities, including oversight of the ICM’s dedicated staff, to ensure the mechanism operates effectively and efficiently.