

The European Investment Bank's approach to human rights

Information note



European
Investment Bank

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1. Introduction

1.1 Our commitment

Respect for human rights is a fundamental value of the European Union and the European Investment Bank (EIB). As an EU body, the Bank adheres to the values the European Union was founded upon, as enshrined in Article 2 of the Treaty on European Union: “The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities.”

The EIB is committed to respecting and promoting human rights in the projects¹ it supports, thus contributing to the objectives of the UN Guiding Principles on Business and Human Rights. The Bank acknowledges that its investments may potentially adversely affect human rights. Where this may be the case, the EIB has put in place a series of policies, procedures and practices to:

- identify and understand the human rights risks and impacts;
- integrate the findings into its due diligence to prevent and mitigate such risks and impacts;
- enable the provision of remedy when projects cause, contribute to, or are directly linked to human rights abuses;
- publicly report about the risks and impacts identified and the prevention and mitigation measures taken;
- engage with the EIB’s stakeholders to discuss the Bank’s approach to avoiding and addressing human rights impacts and risks in the projects the EIB finances.

¹ A project is to be understood as a set of defined works, goods, services and/or business activities for which EIB financing is sought, either directly or through an intermediated financing structure for a specific sub-project/underlying investment, as approved by the EIB’s governing bodies.

1.2 The purpose of this information note

This information note seeks (1) to inform EIB stakeholders about the Bank's commitment to respecting and promoting human rights in its lending operations, and (2) to describe the EIB's approach to avoiding and addressing the human rights impacts and risks of its investments.² The document builds upon an explanatory note prepared for the EIB's Environmental and Social Sustainability Framework (ESSF) consultations³ as well as on the feedback received during the consultations⁴ by further clarifying:

- why the EIB is committed to respecting human rights (chapter 2 — External policy and regulatory context);
- what policies the Bank has in place to fulfil its responsibilities in this area (chapter 3 — EIB policies);
- how the Bank implements its commitment in practice (chapter 4 — Implementation: Procedures and practices);
- the actions the EIB takes to promote human rights (chapter 5 — Promoting human rights).

This document does not add or introduce new commitments or requirements for the European Investment Bank or its promoters, which are already set out in existing policies adopted by the EIB Board of Directors and published on the EIB website.⁵ It is also not a procedure.⁶ The document seeks to clarify the EIB's current approach to human rights-responsive due diligence, acknowledging that this is a complex subject and that best practices are constantly evolving. The Bank seeks to continuously improve its policies and practices, which may change over time.

In case of discrepancies between this document (including its annexes) and approved EIB policies and standards, the latter prevail.

² The guide only applies to the EIB (including EIB Global, the Bank's dedicated arm for activities outside the European Union). It does not cover the activities of the European Investment Fund.

³ https://consult.eib.org/consultation/essf-2021-en/user_uploads/explanatory_note_en.pdf.

⁴ https://consult.eib.org/consultation/essf-2021-en/user_uploads/consultation-report.pdf and https://consult.eib.org/consultation/essf-2021-en/user_uploads/issues-matrix.pdf

⁵ <https://www.eib.org/en/> The EIB seeks to continuously improve its policies and practices, which may therefore change over time. A regularly updated, non-exhaustive list of EIB key policies and standards is available at <https://www.eib.org/en/about/partners/cso/access-information/index.htm>.

⁶ Information on relevant aspects of [EIB Environmental and Social procedures](#) is available separately.

2. External policy and regulatory context

EU treaties include respect for human rights. The EIB is legally bound by the provisions of the Charter of Fundamental Rights of the European Union.⁷ The Bank is therefore required to respect these rights, observe the principles therein and promote the application of the charter within the limits of its powers.

The EIB also complies with other EU legislation, such as the EU Global Human Rights Sanctions Regime.⁸ This regime enables the European Union to impose sanctions on individuals, entities and bodies responsible for, involved in or associated with serious human rights violations and abuses worldwide.⁹

Furthermore, the EIB is driven by international human rights laws, principles and standards, including:

- the European Convention on Human Rights¹⁰;
- the International Bill of Human Rights¹¹;
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work¹² and its fundamental conventions;
- ILO Convention 169 on Indigenous and Tribal Peoples¹³;
- the UN Declaration on the Rights of Indigenous Peoples¹⁴;
- the United Nations Guiding Principles on Business and Human Rights (UNGPs)¹⁵;
- the Organisation for Economic Co-operation and Development Guidelines on Multinational Enterprises (OECD Guidelines).¹⁶

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:12012P/TXT>. According to article 51.1 of the charter, its provisions “are addressed to the institutions, bodies, offices and agencies of the Union with due regard for the principle of subsidiarity and to the Member States only when they are implementing Union law.”

⁸ Council Regulation (EU) 2020/1998 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses.

⁹ “Serious human rights violations” applies to genocide, crimes against humanity and the following serious human rights violations or abuses: (i) torture and other cruel, inhuman or degrading treatment or punishment; (ii) slavery; (iii) extrajudicial, summary or arbitrary executions and killings; (iv) enforced disappearance of persons; (v) arbitrary arrests or detentions. It also applies to other human rights violations or abuses, including but not limited to the following, in so far as the violations or abuses are widespread, systematic or otherwise of serious concern as regards the objectives of the common foreign and security policy set out in Article 21 TEU: (i) trafficking in human beings, as well as abuses of human rights by migrant smugglers as referred to in this Article; (ii) sexual and gender-based violence; (iii) violations or abuses of freedom of peaceful assembly and of association; (iv) violations or abuses of freedom of opinion and expression; (v) violations or abuses of freedom of religion or belief.

¹⁰ https://www.echr.coe.int/documents/convention_eng.pdf

¹¹ <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

¹² <https://www.ilo.org/declaration/lang--en/index.htm>

¹³ <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/indigenous-and-tribal-peoples/lang--en/index.htm>

¹⁴ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

¹⁵ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

¹⁶ <https://www.oecd.org/corporate/mne/>

Through the adoption of its Climate Bank Roadmap¹⁷, the EIB has further pledged to align its tracking methodology for climate action and environmental sustainability finance over time with the framework defined by the Taxonomy Regulation¹⁸, including its minimum safeguards.¹⁹

Finally, as the long-term lending arm of the European Union, the EIB contributes to the pursuit of EU policy objectives. Whether with its own resources or through mandates granted by the European Union and third parties, the EIB supports investment projects, blends loans with grants and provides advisory services in and outside the European Union. For the operations supported by the European Fund for Sustainable Development Plus (EFSD+)²⁰, the Neighbourhood, Development and International Cooperation Instrument (NDICI) Regulation requires the application of a rights-based approach encompassing all human rights, whether civil and political, or economic, social and cultural. One of the objectives of this regulation is to “protect, promote and advance democracy, the rule of law, including accountability mechanisms, and human rights, including gender equality and the protection of human rights defenders, including in the most difficult circumstances and urgent situations.”

The EIB coordinates closely with other EU institutions such as the European External Action Service, the European Commission, and the network of European Union Delegations across the world to ensure alignment with the European Union’s policies and strategic approach to third countries, including on the topic of human rights.

¹⁷ EIB Group Climate Bank Roadmap 2021-2025, para 5.14 and Table 5.3.

¹⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R0852>

¹⁹ The minimum safeguards are procedures implemented by an undertaking that is carrying out an economic activity to ensure the alignment with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights, among others.

²⁰ The European Fund for Sustainable Development Plus (EFSD+) is part of the European Union’s investment framework for external action. It ensures worldwide coverage for blending, guarantees and other financial operations. It is included in the European Union’s long-term budget programme for external action, Global Europe — Neighbourhood, Development and International Cooperation Instrument (NDICI). [European Fund for Sustainable Development Plus \(EFSD+\) \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic-efsd-plus-2021-2025)

3. EIB policies

Within the aforementioned external policy and regulatory context, the EIB has embedded its obligations and commitments to respect and promote human rights into its policies and strategies. The EIB does not have a stand-alone human rights policy. Instead, it has integrated human rights across several different policies with the aim of embedding its human rights commitment throughout its operations. The following instruments are the most significant in giving guidance concerning the practical implementation of the Bank's human rights commitments:

- EIB Group Environmental and Social Sustainability Framework (ESSF), which consists of the EIB Group Environmental and Social Policy²¹ and the EIB Environmental and Social Standards²², complemented by guidance notes²³ and procedures²⁴
- EIB eligibility, excluded activities and excluded sectors list ²⁵
- EIB Group Transparency Policy²⁶
- EIB Group Complaints Mechanism Policy²⁷ and EIB Group Complaints Mechanism Procedures²⁸
- EIB Group Personal Data Protection Policy²⁹
- The Integrity Policy and Compliance Charter³⁰
- The Code of Conduct for its Board of Directors³¹, Management Committee³² and staff³³

In addition, the Bank has a set of policies and procedures to address prohibited conduct and its resulting impacts on human rights.³⁴ Below is a summary of how human rights are addressed in these policies.

²¹ <https://www.eib.org/en/publications/eib-group-environmental-and-social-policy>

²² <https://www.eib.org/en/publications/eib-environmental-and-social-standards>

²³ Currently under development or update, to be published in the first quarter of 2023.

²⁴ https://consult.eib.org/consultation/essf-2021-en/user_uploads/eib-environmental-and-social-handbook.pdf

²⁵ https://www.eib.org/attachments/publications/eib_eligibility_excluded_activities_en.pdf

²⁶ <https://www.eib.org/en/publications/eib-group-transparency-policy-2021>

²⁷ <https://www.eib.org/en/publications/complaints-mechanism-policy>

²⁸ <https://www.eib.org/en/publications/complaints-mechanism-procedures.htm>

²⁹ [EIB Group Personal Data Protection Policy](#)

³⁰ [Integrity Policy and Compliance Charter \(eib.org\)](#)

³¹ [Code of Conduct of the Board of Directors \(eib.org\)](#)

³² [Code of Conduct of the Management Committee \(eib.org\)](#)

³³ [EIB Group Staff Code of Conduct](#)

³⁴ This includes: [the EIB Integrity Policy and Compliance Charter \(https://www.eib.org/en/publications/integrity-policy-and-compliance-charter\)](#), [the EIB Group Anti-Money Laundering and Combatting the Financing of Terrorism Policy \(https://www.eib.org/en/publications/eib-group-anti-money-laundering-and-combatting-the-financing-of-terrorism-policy\)](#), [the EIB Group Anti-Fraud Policy \(https://www.eib.org/en/publications/anti-fraud-policy\)](#), and [the EIB Group Whistleblowing Policy \(https://www.eib.org/en/publications/eib-group-whistleblowing-policy\)](#).

3.1 The EIB Group Environmental and Social Policy

The EIB Group Environmental and Social Policy describes how the EIB Group contributes to the objectives of the European Union to promote sustainable and inclusive development, built around ten key areas of action. The Environmental and Social Policy is guided by international human rights laws.³⁵

The Bank has committed to finance projects that respect human rights and do not limit people's individual and collective rights and freedoms, in line with the EIB Eligibility, Excluded Activities and Excluded Sectors List (see below). The Environmental and Social Policy also states that the EIB expects its promoters to meet their respective human rights responsibilities, in line with the UN Guiding Principles on Business and Human Rights. The Environmental and Social Policy further explains the EIB's approach to certain harms, specifying that the Bank has zero tolerance for forced and child labour³⁶, and that "in relation to EIB-financed projects, the Bank shall not tolerate any: i) forced evictions; ii) gender-based violence and harassment; and, iii) action that amounts to retaliation and harassment." It clarifies that the Bank takes instances of intimidation or reprisals seriously and takes follow-up actions as and where appropriate.

The Environmental and Social Policy also summarises the scope of the Bank's own environmental and social due diligence and monitoring. The policy commits the EIB to conduct a human rights-responsive due diligence process³⁷ whereby impacts and risks are screened and assessed against the Bank's Environmental and Social Standards, which include human rights (chapter 4 provides further details on the EIB's due diligence).³⁸

3.2 EIB Environmental and Social Standards

The EIB Environmental and Social Standards contain the requirements that EIB-financed projects must comply with.

The Bank requires promoters to meet their human rights responsibilities by considering human rights as part of their environmental and social due diligence.³⁹ To this end, promoters must comply with the relevant provisions of the Environmental and Social Standards, which provide a framework for promoters for the identification, assessment, prevention, mitigation and, where necessary, remediation, of adverse human rights impacts:

³⁵ Annex A of this document provides a comprehensive list of the various international human rights instruments that are cited in the EIB Group Environmental and Social Policy.

³⁶ See paragraph 2.12 of the EIB Group Environmental and Social Policy.

³⁷ See section paragraphs 4.14 to 4.29 of the EIB Group Environmental and Social Policy.

³⁸ See Annex B of this document, for a comprehensive list of the various international human rights that are mentioned in each standard.

³⁹ Guiding Principle 17 of the UN Guiding Principles on Business and Human Rights recommends undertakings to carry out human rights due diligence. The principles do not define a set of tools that should be used but rather focus on the establishment of a risk management process that needs to be followed to identify, prevent, mitigate and account for how an undertaking addresses its adverse human rights impacts.

Standard 1 and 2 require promoters to⁴⁰ (a) ensure respect for human rights by integrating human rights impacts and risks into the impact assessment process and/or specific studies or assessments, as relevant; (b) take appropriate action to avoid, prevent and reduce any significant adverse effects; (c) if required, remedy any residual effects and/or compensate people, communities and/or workers affected by a project; (d) systematically follow up and monitor the implementation of agreed prevention, reduction and, if required, remedial/compensatory measures; and (e) as relevant, undertake a stakeholder engagement process commensurate to the project's likely impacts and risks, taking into account the type and complexity of the project, sector and country context.

Standard 1 promotes an integrated approach to impact assessment and risk management by requiring environmental, climate, social and human rights considerations to be addressed and taken into account in decision-making processes.⁴¹ The EIB has opted for this integrated approach, where the first course of action is that impact assessments undertaken are informed by human rights.

While Standard 1 outlines an overarching approach to potential human rights impacts and risks, Standards 3 through 10 cover specific thematic areas: pollution, biodiversity, climate change, involuntary resettlement, indigenous peoples, gender, vulnerable groups, labour rights, health, safety and security and cultural heritage.

The following examples showcase how specific elements of the Environmental and Social Standards⁴² contribute to upholding the EIB's human rights commitments:

- Engagement free from intimidation, coercion or violence (Standard 2) contributes to the right to life; prohibition of torture or cruel, inhuman or degrading treatment or punishment; the right to not be subjected to arbitrary arrest, detention or exile; the right to freedom of opinion and expression.
- Emergency prevention, preparedness and response plans (Standard 3) contributes to the right to life, right to the integrity of the person, right to safe and healthy working conditions and right to an adequate standard of living.
- A socioeconomic assessment of the biodiversity and the ecosystem services (Standard 4) contributes to the right to life, the right to an adequate standard of living, and the rights of indigenous peoples.
- Physical climate risk assessment and minimisation (Standard 5) contributes to the right to life and the right to an adequate standard of living.
- Avoidance of forced evictions (Standard 6) contributes to the right to an adequate standard of living and land rights.
- Conducting a Free, Prior and Informed Consent process (Standard 7) contributes to the rights of indigenous peoples.

⁴⁰ See Environmental and Social Standards, Standard 1, paragraph 3 and Standard 2, paragraph 5.

⁴¹ See Environmental and Social Standards, Standard 1, paragraph 1.

⁴² Examples are provided for illustrative purposes. Requirements apply selectively based on the type of investment that the Bank finances. A case-by-case assessment remains necessary to understand and appropriately address the human rights implications of each activity.

- Zero tolerance for child labour and forced labour (Environmental and Social Policy, Standard 8) supports the International Labour Organization’s fundamental conventions, the rights of the child, prohibition of slavery, right to the integrity of the person and right to an adequate standard of living.
- Preventing and addressing gender-based violence risks (Standard 9) contributes to the right to life, right to dignity of the person, the right to non-discrimination and rights of the child.
- The protection of cultural heritage (Standard 10) contributes to cultural and economic rights; right to freedom of expression; and freedom of thought, conscience and religion.

3.3 EIB eligibility, excluded activities and excluded sectors list

The eligibility excluded activities and excluded sectors list⁴³ defines the types of projects that the Bank does not finance. It indicates that projects that result in limiting people’s individual rights and freedom, or violation of human rights⁴⁴, cannot benefit from EIB financing.

3.4 EIB Group Transparency Policy

The EIB considers openness, transparency and public access to information as essential to respecting fundamental rights. The EIB recognises its special responsibility in this regard. Transparency contributes to the quality and sustainability of the projects that the Bank finances and helps to build trust in the EIB.

The EIB Group adopted a Transparency Policy⁴⁵, which sets out its approach to transparency and stakeholder engagement, laying down provisions for the proactive publication of information and documents and their disclosure upon request. This policy is fully compliant with Regulation (EU) 2018/1725 of 23 October 2018 on the “protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies.”

The policy takes into account the Bank’s responsibility to communicate on human rights impacts, thus contributing to the objectives of the UN Guiding Principles. As specified in the policy, the EIB Group does not tolerate any form of retaliation against individuals or organisations for exercising their rights.

⁴³ [EIB Eligibility, Excluded Activities and Excluded sectors list](#)

⁴⁴ Such as prisons and detention centres of any form, and activities that are known directly or indirectly to result in harmful or exploitative forms of forced labour or harmful child labour, as defined by the International Labour Organization’s Fundamental Labour Conventions.

⁴⁵ <https://www.eib.org/en/publications/eib-group-transparency-policy-2021>

3.5 EIB Group Complaints Mechanism Policy

The Complaints Mechanism (CM) is the public accountability tool of the EIB Group. One of its main objectives is to ensure the right of EIB Group stakeholders to be heard and to complain, thus giving voice to their concerns regarding alleged maladministration by the EIB Group in its projects or activities.⁴⁶

Along with the projects' own mechanisms, the Complaints Mechanism is the Bank's response to the UN Guiding Principle that calls for having grievance mechanisms in place. The Complaints Mechanism is designed to facilitate and handle complaints from individuals, organisations, local authorities, or corporations alleging maladministration by the EIB Group. This can include complaints related to human rights impacts associated with alleged maladministration in the Bank's activities. Complainants do not need to be directly affected by an EIB decision, action or omission and are not required to identify the specific policy, procedure or standard that may have been breached. Any member of the public has access to a two-tier procedure, one internal — the EIB Complaints Mechanism Division — and one external — the European Ombudsman. Complainants who are not satisfied with the outcome of the procedure before the Complaints Mechanism or with the EIB Group's response have the right to lodge a complaint of maladministration against the EIB Group with the European Ombudsman.

When the Complaints Mechanism performs a compliance review of the Bank regarding alleged human rights harms and determines that there has been maladministration by the EIB Group, it can make recommendations to the EIB Management Committee within the Bank's scope of actions and in line with the applicable regulatory framework. This also enables alternative and pre-emptive resolutions of disputes between complainants and the Bank.

Inspired by the UN Guiding Principles on Business and Human Rights, the EIB Group Complaints Mechanism Policy defines the mechanism's own guiding principles: transparency, independence and a commitment to being effective, accessible and free of charge. The policy emphasises that complainants must never be subject to any form of retaliation, abuse or discrimination based on the fact that they have exercised their right to complain. This applies to the EIB Group and to any counterpart that is in a business relationship with the EIB Group.

⁴⁶ Moreover, parties participating in a tender process under the Guide to Procurement can submit their complaints to the Bank's Procurement Complaints Committee.

3.6 EIB Group Personal Data Protection Policy

The EIB places great importance on the protection and appropriate processing of personal data, including that of its clients and the stakeholders of the projects it supports. Under the supervision of the EIB Data Protection Officer, the EIB Group has developed a Personal Data Protection Policy.⁴⁷ In line with this policy and the requirements of the Regulation (EU) 2018/1725, the Bank has created and maintains an inventory of records to ensure that it processes personal data in a manner consistent with the aforementioned regulation.

In accordance with the Personal Data Protection Policy, the Bank has published an EIB Data Protection Statement which, considering the potential impact of the Environmental and Social Sustainability Framework on the right of data protection and privacy, provides information regarding the processing of personal data in the context of the EIB's environmental, climate and social due diligence.

3.7 EIB Integrity Policy and Compliance Charter

The Integrity Policy and Compliance Charter sets out the fundamental ethical principles applicable to the EIB Group and underlines the commitment of the EIB Group to a policy of integrity in the performance of its mission. The implementation of these fundamental principles is the individual responsibility of each EIB Group staff member and each member of the relevant decision-making and supervisory bodies. These provisions are overseen by the EIB's Compliance Function which, in accordance with the principles laid down by the Basel Committee⁴⁸, is an independent function under the guidance and responsibility of the EIB Group Chief Compliance Officer, with oversight by the Group Chief Risk Officer, who has direct access to the EIB President and Management Committee.

3.8 EIB codes of conduct for its Board of Directors, Management Committee and staff

The EIB Group's codes of conduct constitute a key element of its governance and reflect the guiding principles of its Integrity Policy and Compliance Charter. The codes lay down the internal rules and practical arrangements applicable in matters of professional ethics to members of the EIB Board of Directors, Management Committee and staff, as well as to any other person working for EIB Group, including consultants and other service providers, to the extent that their contractual agreements with the EIB Group so provide. The codes promote the values of integrity, respect, cooperation, commitment and equal opportunities. They identify the core values and principles of the EIB's business ethics and set out standards of professional behaviour and conduct expected to be demonstrated by their addressees.

⁴⁷ https://www.eib.org/attachments/general/eib_group_personal_data_policy_en.pdf

⁴⁸ [The Basel Committee - overview \(bis.org\)](#)

4. Implementation: Procedures and practices

This section describes how, through the implementation of its policies, the EIB implements its commitment to respect human rights.

4.1 Human rights-responsive due diligence⁴⁹

In line with the UN Guiding Principles on Business and Human Rights, the EIB seeks to identify and understand the risks to human rights in the projects it finances, to avoid and address them, and enable their remediation where necessary. To this end, the Bank is committed to undertaking human rights-responsive environmental and social due diligence and monitoring of the operations it finances for the timely identification, prevention and mitigation of adverse impacts on human rights (see Annex C).

The EIB's due diligence process takes into account environment, climate, social and human rights risks deriving from the country context, sector, project and client capacity. When defining the level of due diligence and support a promoter may require, the Bank considers, to the extent possible, legacy issues and other contextual factors, including those related to human rights, which may affect the environmental and social performance of the project. The EIB due diligence is guided by considerations of the severity, likelihood, and frequency of identified human rights impacts, thereby making it possible to prioritise the mitigation measures accordingly.⁵⁰

The due diligence is based on the information provided by the promoters as well as additional data, information and independent reports as required, whether readily available in the public domain or specifically commissioned by the EIB.

4.1.1 Organisation

The responsibility to undertake project-related environmental and social due diligence lies within the EIB's Projects Directorate⁵¹, a team of specialists of different academic and professional backgrounds with strong technical knowledge of their respective sectors, such as energy, transport, etc. These specialists also have considerable understanding of social and human rights issues in their sectors. In addition, each sector has dedicated social experts performing social due diligence who have human rights expertise on issues specifically related to their sector, such as resettlement, labour, conflict and fragility, supply chains, gender, migration, and others.

⁴⁹ This section describes the process for direct operations. The due diligence applicable for intermediated operations is described in Standard 11 of the Environmental and Social Standards.

⁵⁰ Severity is appraised on the basis of the scale (gravity of the impact that might occur), scope (number of individuals that are or will be affected) and remediable character of the impact (the possibility that the situation of those affected can be restored at least to a situation equivalent to that of before the impact). The likelihood of potential human rights impacts is often based on (i) the country context related to specific rights (ii) the business model and (iii) specific business relationships that pose particular risks to human rights. These considerations are taken into account throughout the due diligence process.

⁵¹ The Projects Directorate is separate from its Operations Directorate in the EIB's internal organisational structure.

At a policy level, the Projects Directorate also has experts in its Environment, Climate and Social Office in charge of policy oversight, safeguarding, procedures and capacity building, among others.

The Bank's independent Compliance Function complements the due diligence undertaken by the Projects Directorate, as required, in accordance with internal operational rules.

EIB Global is expanding the resources in the Bank's local offices with recruitment of social specialists in several countries outside the European Union. These social specialists based in the regional offices will play an important role in monitoring projects.

4.1.2 Projects

The EIB's human rights-responsive due diligence process for direct lending takes the following steps⁵²:

Pre-appraisal

As a first step, the EIB screens the project to identify country, sector, project and promoter capacity risks and impacts. Based on this initial screening, the Bank determines the project's risk categorisation⁵³ and the nature and scope of the due diligence process required.

Should the Bank consider that the human rights risks associated with the project are high and there is limited possibility to prevent or mitigate them, the project might not be considered further for financing, in line with the EIB's eligibility, excluded activities and excluded sectors list.

Appraisal

If the project moves on to the appraisal stage, the Bank pursues its due diligence on the basis of the identified risk level and the quality of available information. High risk projects will typically require a higher level of due diligence.

Following a visit to the project site and a review of existing studies and other information as relevant, if the Bank finds that existing assessments and mitigation measures do not adequately identify human rights impacts and risks and/or avoid addressing them, the Bank may require the promoters to undertake additional studies and/or introduce further actions and/or management plans to prevent and mitigate the risks and impacts, in line with the requirements of the Environmental and Social Standards. Such additional studies or plans may include improvements to the existing environmental and social impact assessments or complementary stand-alone assessments.⁵⁴

⁵² For a comparison between EIB actions and the due diligence step of the UN Guiding Principles on Business and Human Rights, please see Annex C of this document.

⁵³ See paragraph 4.18 of the [EIBG Environmental and Social Policy](#)

⁵⁴ These may include for example human rights assessments, labour assessments, health impact assessments, gender impact assessments, labour audits, conflict sensitivity analysis, planning resettlement documents, Indigenous Peoples Development Plans, other specific management plans in response to identified risks, etc.

When gaps are identified with the EIB Environmental and Social Standards, including gaps related to respect for human rights, and in order for the promoter to take corrective action and address them within a reasonable timeframe, the Bank may request the development of an environmental and social action plan (ESAP). Depending on the complexity of the project, the EIB can contract with external consultants and experts at its own cost to provide technical assistance, training, etc., to inform the Bank's decision-making process, or to support the promoters on human rights and provide remedy as necessary to ensure compliance with the EIB Environmental and Social Standards.

Contract

To implement the Environmental and Social Sustainability Framework, all projects are required to comply with social requirements, which include respect for human rights relevant to a project. Where deemed appropriate given the identified impacts or risks of a project as assessed during the appraisal phase, the Bank may, on a risk-based approach, include appropriate and targeted contractual obligations, disbursement conditions and undertakings (i) to address relevant human rights considerations during the implementation of the project (including remediation requirements as relevant) and (ii) to define the human rights-related reporting and monitoring requirements. This includes, for example, the request of Free Prior and Informed Consent (FPIC) when applicable, considerations of biodiversity, labour and occupational health and safety supply chain risks, or requirements related to involuntary resettlement (particularly when it affects slum dwellers or others who lack legal ownership of land or assets). In addition, as a general rule, through contractual undertakings, the Bank requires promoters to implement and operate the projects it finances materially in compliance with environmental and social laws, including applicable international treaties, and which include, but are not limited to, the EU Global Human Rights Sanctions Regime.⁵⁵

Monitoring

During the implementation phase and in line with the environmental and social contractual obligations and undertakings, the EIB monitors the human rights performance of projects, with a varying scope and depth commensurate with the associated risks. Monitoring is based on regular and incident reports provided by the promoter and/or independent consultants, as well as through monitoring visits by the Bank, as considered relevant for each project. When needed, the EIB can also secure the services of international or local specialists, to enhance the monitoring, conduct additional studies including in relation to human rights (such as labour and health and safety audits) and/or to support the promoter as needed.

The EIB also periodically monitors its counterparties and their related parties against sanctions lists, including the EU Global Human Rights Regime.

⁵⁵ Council Regulation (EU) 2020/1998 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses.

If human rights infringements occur in relation to the project, the EIB's main course of action is to apply leverage and to support the promoters in their efforts to, as needed, address the impacts and/or provide remedy.

The finance contract entitles the EIB to exercise contractual remedies in case of a breach of contract. The type of contractual remedies depends on the nature of the financing product. In the case of a standard direct loan, this includes demanding the repayment of the loan and the suspension of disbursements. Depending on the nature of the breach of contract, grace periods might apply during which the relevant breach can be remedied. The decision to declare a borrower in default and accelerate the loan may have severe consequences.⁵⁶ For this reason, an assessment of the circumstances of the individual case is needed before exercising contractual remedies. See section 4.2.3 for further information on access to remedy.

4.2 Other considerations

4.2.1 Avoiding and addressing reprisals

Freedom of expression and thought is a fundamental right. As an EU body, the EIB considers that enabling dissenting voices and diverse opinions regarding its projects is at the heart of democracy and the rule of law.

In line with the EIB Group Environmental and Social Policy, EIB Standard 2 on Stakeholder Engagement, and the EIB Group Transparency Policy, stakeholders must be able to engage freely with the Bank and with the project's promoters in providing feedback, voicing opposition, and raising concerns. Such free engagement helps the Bank understand risks and impacts from stakeholders' perspectives and develop more open dialogue and trust. The Bank does not tolerate acts of intimidation or reprisals in relation to EIB-financed activities and takes follow-up actions where appropriate, in line with its policies. The EIB has developed specific guidelines to help promoters manage the risk of reprisals.⁵⁷ The Complaints Mechanism has also developed an approach to avoiding and addressing reprisals against complainants or complaint-related people.⁵⁸

The EIB, including the Complaints Mechanism, has no law enforcement powers and, consequently, no possibility to provide protection to complainants and associated individuals. It therefore focuses on assessment, prevention and deterrence of such practices.

⁵⁶ This may include the borrower's insolvency and the end of the project, which could severely affect the workers and the community. In some cases, if the Bank accelerates the loan, rightsholders may be subject to worse human rights impacts.

⁵⁷ See chapter 8 on "Addressing risks of reprisals" in the Guidance Note for EIB Standard on Stakeholder Engagement in the EIB Operations. <https://www.eib.org/en/publications/guidance-note-for-eib-standard-on-stakeholder-engagement-in-the-eib-operations>

⁵⁸ <https://www.eib.org/en/publications/cm-s-approach-to-preventing-and-addressing-reprisals>

4.2.2 Access to information and transparency

Transparency and access to information is essential to respecting human rights and providing effective access to remedy.

Promoters are required to make available to the public relevant project information in a timely manner, including information related to the environmental, climate and/or social impacts and risks, and to the mitigation and/or compensatory/remedial measures and monitoring arrangements, where applicable.⁵⁹ Where relevant, the EIB provides guidance to support promoters in their efforts to be transparent.⁶⁰

The UN Guiding Principles on Business and Human Rights envisage communication on management of human rights risks and formal reporting in the case of severe risks and impacts. In compliance with the Aarhus Regulation⁶¹, environmental information held by the Bank is made available through the EIB public register⁶², which is set up on the Bank's website. The EIB publishes information regarding all projects it supports, including, as applicable, a project summary, environmental information such as impact assessments reports, specific environmental and social studies, a description of the environment and social due diligence undertaken by the Bank at the appraisal and completion phases (at the end of the monitoring phase)⁶³, and an additionality and impact statement. The environmental and social data sheets and environmental and social completion sheets published on the public register include information on human rights-related risks and impacts, where relevant.

The EIB Group also publishes annual reports, including the Sustainability Report, which provides a comprehensive overview of the impact of the Bank's activities to support sustainable growth across the globe and highlights its corporate responsibility efforts. The Bank also publishes disclosures in line with specific reporting frameworks such as the Global Reporting Initiative and the Standards and the Sustainability Accounting Standards Board.⁶⁴

⁵⁹ In line with Standards 1 and 2 as applicable.

⁶⁰ See Guidance note for EIB Standard on Stakeholder Engagement in the EIB Operations, which included a chapter on "Information disclosure." Further guidance may be provided, notably as foreseen in paragraph 4.10 of the EIB Group Environmental and Social Policy.

⁶¹ Regulation (EC) No 1367/2006, as amended.

⁶² <https://www.eib.org/en/registers/index.htm>. The "Frequently Asked Questions" (FAQ) page of the EIB Public Register contains additional information about the content of the Register, including a regularly updated list of the types of documents published in the Register.

⁶³ This refers to the Environment and Social Data Sheet and the Environment and Social Completion Sheet.

⁶⁴ <https://www.eib.org/en/about/cr/reporting-on-corporate-responsibility/index.htm>

4.2.3 Access to remedy

Access to remedy is a core principle of the international human rights system, and the UN Guiding Principles on Business and Human Rights recognise and reinforce the need for businesses to provide access to effective remedy. The EIB has embedded effective access to remedy in its Environmental and Social Sustainability Framework. It requires promoters to identify impacts, avoid and address them and to provide remedy when harm occurs.⁶⁵ The Bank may support promoters in the provision of remedy.

The EIB also requires promoters of projects outside the European Union to establish and maintain, as early as possible, an effective grievance mechanism as well as a specific mechanism allowing workers to raise their workplace concerns.⁶⁶ Grievance mechanisms should comply with the effectiveness criteria of the UN Guiding Principles on Business and Human Rights.⁶⁷ As part of its due diligence and monitoring activities, the Bank reviews the policies and procedures governing project-level grievance mechanisms and assesses their performance. To ensure compliance with the Environmental and Social Standards, the Bank may consider supporting promoters with technical assistance and/or training in the development and implementation of the project-level grievance mechanism.

Any member of the public can address complaints concerning alleged maladministration by the EIB Group to the Complaints Mechanism.⁶⁸ Outside the European Union, the EIB requires promoters to inform key stakeholders in EIB-financed projects, including local communities affected, about the existence and mandate of project-level grievance mechanisms (as relevant) and about the Complaints Mechanism.⁶⁹ The Complaints Mechanism may support resolution of complaints through dispute resolution between the promoter and the complainant, or perform a compliance review of the Bank regarding alleged breaches of human rights with a view to determining whether there is maladministration by EIB Group. In such a case, the Complaints Mechanism can make recommendations within the Bank's scope of actions and in line with the above-mentioned policies and procedures.

⁶⁵ See Environmental and Social Standards, Standard 1, paragraph 3.b., the glossary, and paragraph 3.2(v), footnote 32 of the Environmental and Social Policy.

⁶⁶ Before the approval of the Environmental and Social Sustainability Framework, the EIB published a guidance note for EIB Standard on Stakeholder Engagement in EIB Operations, which includes a chapter on the grievance mechanism. Further guidance may be provided, notably as foreseen in paragraph 4.10 of the Environmental and Social Policy.

⁶⁷ See paragraph 21 of EIB Standard 2 on Stakeholder Engagement.

⁶⁸ In line with the EIB Complaints Mechanism Policy.

⁶⁹ See paragraph 33 of the EIB Standard 2 Stakeholder Engagement.

5. Promoting human rights

In addition to avoiding and addressing negative human rights impacts, the EIB promotes human rights by investing in projects that enhance quality of life, inclusion and equal opportunities, build resilience to climate change and unforeseen crises, and support good quality employment and financial inclusion. The Bank seeks to contribute to the building of peaceful and stable societies, and to promote social inclusion and cohesion in fragile regions and areas affected by conflict.

The Bank supports the pursuit of the UN Sustainable Development Goals, which seek “to realise the human rights of all” and are firmly anchored in human rights principles and standards.⁷⁰ The development impact of the Bank’s activities is calculated not only in the context of each investment project, but also at the sectoral, national and international levels. Every year, the Bank publishes an assessment of its contribution to the Sustainable Development Goals.⁷¹

The EIB invests in projects that make a real difference to people’s lives, and that protect the environment and tackle climate change. The Bank has put in place an Additionality and Impact Measurement Framework (AIM Framework)⁷² to track and assess inputs, outputs, and outcomes through the investment cycle, to show how the EIB delivers on these aspects. The AIM Framework provides a comprehensive basis for measuring results and assessing each EIB project in terms of both its impact and additionality, in line with international best practices. The framework asks why an intervention by the EIB is needed, what will be achieved, and how the EIB will make a difference. The assessment undertaken for each project is summarised in an additionality and impact statement which is published on the EIB website following signature.

The EIB recognises that a project’s positive contributions to human rights do not offset any adverse impacts. The Bank considers the range of human rights risks that can arise from a project promoting other environmental and social goals. For example, if financing an irrigation system, the Bank will focus on outcomes related to the right to water and food, while also avoiding and addressing human rights impacts related, for example, to land use and treatment of workers hired to construct the system.

⁷⁰ <https://www.ohchr.org/en/sdgs>

⁷¹ <https://www.eib.org/en/publications/the-eibs-contribution-to-the-sustainable-development-goals>

⁷² <https://www.eib.org/en/projects/cycle/monitoring/aim.htm>

Through its activities, the EIB seeks to reduce or eliminate, when possible, prevailing patterns of discrimination and related exclusion.⁷³ It does so, for example, by investing in projects that promote gender equality, women's economic empowerment, social inclusion, and equal access to the employment, benefits and opportunities generated by its activities.

The EIB seeks to invest in projects that support a just and fair transition and promote social development. Building on its track record in promoting social inclusion, gender equality, economic resilience and conflict sensitivity, the EIB consistently aims to identify additional opportunities to strengthen climate and social outcomes.

The Bank encourages promoters to identify opportunities for enhancing the positive benefits of their operations⁷⁴ by (i) providing advice and technical support, (ii) conducting specific studies, (iii) and publishing guidance⁷⁵, thereby fostering the promotion of human rights.

⁷³ In line with paragraph 2.8 of the Environmental and Social Policy, as applicable.

⁷⁴ In line with Standard 1, as applicable.

⁷⁵ For example, the EIB developed the 2X Gender Climate Smart Guide <https://www.2xcollaborative.org/toolkit>

6. Going forward

The EIB continuously evaluates and reviews how best to strengthen its approach to managing human rights. It seeks to improve its policies, procedures and practices and to enhance its performance through targeted recruitment, regular training for its staff, internal evaluations based on policy commitments and regular dialogue with civil society.

In addition, the Bank will develop a good practice note on human rights to support its clients in identifying, avoiding and addressing human rights risks and impacts under its Environmental Social Sustainability Framework.

The EIB will continue engaging with other development finance institutions, UN entities, trade unions, promoters, industrial associations, impact assessment practitioners, civil society organisations and other stakeholders, to continuously improve its approach, enhance its positive impact on human rights and address shared challenges. The Bank's policies, procedures and practices upon which this document is based may evolve over time. In the event of discrepancies between this document and approved EIB policies, standards, etc., the latter prevail.

Annex A: Human rights instruments references in the EIB Group Environmental and Social Policy

This annex provides a list of the human rights instruments that are cited in the EIB Group Environmental and Social Policy.⁷⁶

- Charter of Fundamental Rights of the European Union
- European Convention on Human Rights
- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Minimum Social Safeguards as defined in the EU Taxonomy Regulation (which refer to the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the eight fundamental International Labour Organization conventions and the International Bill of Human Rights).

⁷⁶ Please refer to the policy for the context and purpose of each reference.

Annex B: Human rights instruments references in the EIB Environmental and Social Standards

This annex provides a list of the human rights instruments that are cited in the different Environmental and Social Standards.⁷⁷

Standard 1

- Minimum Social Safeguards as defined in the EU Taxonomy Regulation (which refer to the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the eight fundamental International Labour Organisation conventions and the International Bill of Human Rights)
- United Nations Economic Commission for Europe (UNECE)'s Aarhus Convention

Standard 2

- Charter of Fundamental Rights of the European Union
- United Nations Guiding Principles on Business and Human Rights
- United Nations Economic Commission for Europe (UNECE)'s Aarhus Convention
- Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

Standard 6

- UN Commission on Human Rights, Forced evictions, 10 March 1993, E/CN.4/RES/1993/77
- UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No. 7: The right to adequate housing
- UN Basic Principles and Guidelines for Development-based Evictions and Displacement

Standard 7

- EU Charter of Fundamental Rights
- ILO Convention C169 - Indigenous and Tribal Peoples Convention, 1989 (No. 169)
- United Nations Declaration on the Rights of Indigenous Peoples
- Council of Europe Convention on preventing and combating violence against women and domestic violence

Standard 8

- Fundamental conventions of the International Labour Organization
- Minimum Social Safeguards as defined in the EU Taxonomy Regulation (which refer to the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the eight fundamental International Labour Organization conventions and the International Bill of Human Rights)
- Charter of Fundamental Rights of the European Union
- ILO Convention C-158 on Termination of Employment

⁷⁷ Please refer to the relevant Standard for the context and purpose of each reference.

- ILO Convention C-190 on Violence and Harassment and accompanying Recommendation R206)
- UN Convention on the Rights of Persons with Disabilities
- International Convention on the Elimination of all Forms of Racial Discrimination
- Convention on the Elimination of All Forms of Discrimination against Women
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- EU Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation
- EU Directive 2006/54/EC on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation

Standard 9

- Charter of Fundamental Rights of the European Union
- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- ILO Convention 190 on Violence and Harassment and accompanying Recommendation R206.
- Minimum Social Safeguards as defined in the EU Taxonomy Regulation (which refer to the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the eight fundamental International Labour Organization conventions and the International Bill of Human Rights)
- UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
- UN Code of Conduct for Law Enforcement Officials
- Voluntary Principles on Security and Human Rights
- International Code of Conduct on Private Security Providers
- ILO Convention 155 on Occupational Safety and Health and accompanying Recommendation R164
- ILO Convention 121 on Employment Injury Benefits & accompanying Recommendation R121
- UN Convention on the Rights of Persons with Disabilities
- Recommendation 197 on the Promotional Framework for Occupational Safety and Health
- ILO Convention 81 on Labour Inspection
- ILO Convention 129 on Labour Inspection (Agriculture)
- ILO Convention 174 on the Prevention of Major Industrial Accidents and the relevant ILO Code of Practice on Prevention of Major Industrial Accidents
- ILO Recommendation 102 on Welfare Facilities
- ILO Convention 161 on Occupational Health Services

Standard 10

- UNESCO 1972 Convention concerning the Protection of the World Cultural and Natural Heritage
- UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage
- UNESCO 2003 Convention for the Safeguarding of the Intangible Cultural Heritage
- Council of Europe 1985 Convention for the Protection of the Architectural Heritage of Europe
- Council of Europe 1992 Valetta Convention on the Protection of the Archaeological Heritage
- Council of Europe 2000 European Landscape Convention
- Council of Europe 2005 Framework Convention on the Value of Cultural Heritage for Society (the Faro Convention)

Standard 11

- UN Guiding Principles on Business and Human Rights

Annex C: UN Guiding Principles on Business and Human Rights due diligence steps and EIB approach

The table below provides a non-exhaustive overview of key elements of the EIB’s approach to human rights that are especially relevant in relation to the six due diligence steps defined by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises.

UN Guiding Principles on Business and Human Rights due diligence steps	EIB approach
<i>Step 1: Embedding human rights into policies and management systems</i>	In line with its commitment to respect human rights, the EIB has integrated human rights considerations into its strategies, policies and procedures (see chapter 3 on EIB policies). Strategies and policies are generally approved by the EIB Board of Directors.
<i>Step 2: Identifying and assessing actual or potential adverse human rights impacts</i>	<p>Before deciding to invest in a project (in EIB project terminology during the pre-appraisal and appraisal phases), the Bank identifies and assesses the actual or potential adverse human rights impacts. Should the Bank consider that the impacts cannot be avoided or addressed, it may decide not to continue with the project.</p> <p>The identification and assessment are done based on the impact assessment undertaken by the promoter (including upon explicit request of the EIB) and may make use of different sets of information and independent reports, whether readily available in the market or specifically commissioned by the Bank. As relevant, and especially in consideration of contextual factors, the Bank may commission additional studies, assessments, audits, etc., to inform its decision. Stakeholders should be involved in the identification of impacts, as part of the meaningful engagement that is required under Standard 2.</p> <p>For projects with significant impacts and risks, or if deemed necessary by the EIB, promoters are expected to prepare and implement a stakeholder engagement plan describing the stakeholder engagement process throughout the project cycle. This should allow affected stakeholders to understand and influence how impacts are being addressed.</p> <p>The Bank may support the promoter to implement the EIB Environmental and Social Standards (for example through training or technical assistance to undertake the impact assessments and the development of environmental and social management systems).</p> <p>The Bank may identify additional impacts during the monitoring phase (step 4).</p>

UN Guiding Principles on Business and Human Rights due diligence steps	EIB approach
<p><i>Step 3: Integrating findings across relevant internal functions and processes and taking appropriate action</i></p>	<p>During the appraisal phase, the EIB considers the findings of the promoter’s impact assessments and other studies that the EIB may have independently commissioned, to define prevention, mitigation and remediation measures if necessary. Requirements for actions, reporting and monitoring are included in action plans and the finance contract, as relevant.</p> <p>Based on the identified impacts, contextual factors and the promoter’s capacity, the Bank may support the promoter in the implementation of mitigation measures and the provision of remedy (for example through technical assistance and capacity-building, negotiations with rightsholders, or dispute resolution services).</p> <p>Additional measures may be considered necessary during the monitoring phase, should impacts that were not previously identified materialise. These measures could include, for example, labour or occupational health and safety audits following identification of instances of child labour or forced labour or fatalities in connection with the project.</p> <p>Should the EIB learn of material violations (for example through monitoring, or as a result of a complaint) of applicable human rights-related requirements by the project promoter, the Bank may engage with the promoter to redress the situation.</p> <p>When human rights infringements occur, the EIB’s main course of action is to apply leverage and support the promoters in their efforts to address impacts and provide remedy as needed.</p>
<p><i>Step 4: Tracking the effectiveness of measures and processes to address adverse human rights impacts to know if they are working</i></p>	<p>During the monitoring phase, the Bank reviews the monitoring reports and undertakes as relevant monitoring missions and additional assessments to evaluate the effectiveness of action plans put in place to prevent and mitigate the risks and impacts.</p> <p>The Bank also assesses the quality of its own policies and processes and the adequacy of its practices. These assessments may be undertaken by the relevant service with support from expert consultancies (the Projects Directorate), the independent evaluation team, Internal Audit, and/or the Complaints Mechanism.</p>
<p><i>Step 5: Communicating on identified impacts and how they are being addressed</i></p>	<p>The EIB summarises the results of its due diligence at the appraisal stage in environmental and social data sheets that are made public via the EIB website. Once the relevant projects are completed, the Bank publishes the environmental and social completion sheets that provide information on the monitoring phase. Further information is provided in EIB annual reports, including on sustainability (see 5.2 on access to information and transparency).</p>

UN Guiding Principles on Business and Human Rights due diligence steps	EIB approach
<p><i>Step 6: Provision for, or cooperation in, remediation and establishing grievance mechanisms</i></p>	<p>In consideration of the “cause, contribute and directly linked” framework described in the UN Guiding Principles on Business and Human Rights, the Bank requires promoters to remedy harm in accordance with the relevant provisions of the Environmental and Social Standards.</p> <p>Stakeholders can request additional information from the Bank at any point in a project’s life cycle, as defined in the EIB Group Transparency Policy. They can address any complaint to the available accountability mechanisms, from the project-level grievance mechanism to the EIB Group Complaints Mechanism or the European Ombudsman.</p> <p>The EIB’s Complaints Mechanism serves as its public accountability tool, with the objective of allowing stakeholders to voice their concerns regarding alleged maladministration by the EIB Group in a project or an activity. It also enables alternative and pre-emptive resolution of disputes between complainants and the Bank. The Complaints Mechanism operates in addition to project-level grievance mechanisms established by the promoter.</p> <p>The Bank may support the promoter in the implementation of remediation (for example by providing technical assistance, participating in negotiations between the promoter and the affected rightsholders or conducting the relevant investigations as part of the Complaints Mechanism functions).</p>

The European Investment Bank's approach to human rights

Information note



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