European Bank
for Reconstruction and Development

Independent
Project
Accountability
Mechanism

Compliance Assessment Report

Uzbekistan
Bash and Dzhankeldy WPPs
EBRD Project numbers 52772, 52773
Case 2024/04

October 2026

The **Independent Project Accountability Mechanism (IPAM)** is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determines whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project.

For information about IPAM, please contact us at ipam@ebrd.com or visit the IPAM webpage.

Contact information

The Independent Project Accountability Mechanism (IPAM)
European Bank for Reconstruction and Development
Five Bank Street,
London
E14 4BG

Telephone: +44 (0)20 7338 6000
Email: ipam@ebrd.com

How to submit a complaint to the IPAM

Concerns about the environmental and social performance of an EBRD Project can be submitted by email, in writing, or via the online form at:

https://www.ebrd.com/project-finance/ipam.html

Table of Contents

List of Abbreviations 4

Executive Summary 5

1. The Case and Processing to Date 6

   The Request 6

   The Projects 6

   Processing to Date 7

2. Conclusion and Next Steps 9

List of Abbreviations

ADB	Asian Development Bank
CEEC	China Energy Engineering Corporation
DEG	Deutsche Investitions- und Entwicklungsgesellschaft (German development finance institution)
EBRD	European Bank for Reconstruction and Development
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESP	2019 Environmental and Social Policy
GBVH	Gender-Based Violence and Harassment
IPAM	Independent Project Accountability Mechanism
NTS	Non-technical Summary
OPEC Fund	Organization of the Petroleum Exporting Countries Fund for International Development
PAP	2019 Project Accountability Policy
PR	Performance Requirement of the 2019 Environmental and Social Policy
Proparco	Promotion et Participation pour la Coopération Économique (French development finance institution for private sector)
SPV	Special Purpose Vehicle
WPP	Wind Power Plant
WTG	Wind Turbine Generator

Executive Summary

On 19 May 2024, IPAM received a Request from a former female employee of ACWA Power Bash Wind FE LLC concerning two EBRD-financed wind energy projects in Uzbekistan Bash WPP (52772) and Dzhankeldy WPP (52773). The Requester alleged that while working for the Client she systemically faced gender discrimination, stigmatisation, and harassment in the workplace. She also alleged that she was subject to a smear campaign that has prevented her from being employed in other projects. In addition, the Requester raised concerns about discriminatory treatment to women workers, unjustified dismissal, and poor living conditions at project camps. Before coming to IPAM, the Requester raised these concerns with the Client and the EBRD. Because of fear of retaliation, she has asked for her Request to be considered by the Compliance function of IPAM.

The Request relates to two wind energy projects in Uzbekistan, Bash WPP and Dzhankeldy WPP, each involving a 500 MW wind power plant and a senior secured loan of up to USD 150 million. Both projects were developed by Special Purpose Vehicles owned by ACWA Power and co-financed by EBRD, ADB, DEG, Proparco, OPEC Fund, and commercial banks. Approved by EBRD in October 2022 as Category A projects, they aim to diversify Uzbekistan's energy mix, reduce reliance on thermal power, and attract private investment in renewables. Classified as Gender-SMART, the Projects included commitments to increase women's representation in management roles by 5 percentage points within three years. During the construction period (March 2023 – March 2025) all workers were accommodated in on-site camps. Both Projects are now operational.

The Request was received by IPAM on 19 May 2024 and its registration deferred until October 2024 in light of concerns about retaliation. It was then directly transferred to the Compliance function.

As required by the 2019 Project Accountability Policy (PAP), IPAM reviewed the Request, project documentation, and the Management Response, and engaged with the Requester, the Client, and Management to determine whether the Case meets the eligibility criteria for a Compliance Review.

As IPAM was finalising the preliminary analysis to determine whether the Case was eligible for Compliance Review, the Requester communicated to IPAM in September 2026 that she wished to withdraw her Request, due to ongoing fear of retaliation from the Client.

In handling Cases, IPAM seeks to avoid exposing Requesters to further harm, consistent with its commitment to ensuring safe access to the Mechanism. While IPAM may preserve a Requester's confidentiality, assess retaliation risks, and take measures to facilitate safe access to the Mechanism, it is not mandated or equipped to provide protective or enforcement measures on the ground, nor can it ensure redress is provided if retaliation occurs.

Moreover, the 2019 Project Accountability Policy (PAP) establishes a request-based process and does not foresee the initiation or continuation of a Case where the Requester withdraws, even when (i) the available information indicates potential harm linked to a possible Bank non-compliance, and (ii) the withdrawal is solely linked to fear of retaliation - as in the present Case.

In sum, in light of the Requester's withdrawal and IPAM's inability to proceed in the absence of a Requester, IPAM recommends that the Board approve the closure of Case 2024/04. Following the Board's approval, this Compliance Assessment Report will be published in the Case Registry under Case 2024/04. Publication of the Report will formally conclude the processing of the Case.

1. The Case and Processing to Date

The Request

On 19 May 2024, IPAM received a Request from a former female employee of the Client concerning two EBRD-financed wind energy projects in Uzbekistan Bash WPP (52772) and Dzhankeldy WPP (52773). The Requester alleged that while working for the Client she systemically faced gender discrimination, stigmatisation, and harassment in the workplace. She also alleged that she was subject to a smear campaign that has prevented her from being employed in other projects. In addition, the Requester raised concerns about discriminatory treatment to women workers, unjustified dismissal, and poor living conditions at project camps. Before coming to IPAM, the Requester raised these concerns with the Client and the EBRD. Because of fear of retaliation, she has asked for her Request to be considered by the Compliance function of IPAM.

Table 1. Issues raised in the request and related performance requirements

Issue	Allegations by Requester	Related PRs
GBVH against female workers at large	• Discrimination and unjustified dismissals. • Poor living conditions at the Project camps.	PR2
GBVH against the Requester	• Discrimination and harassment, followed by stigmatisation and a smear campaign.	PR2

The Projects

The request submitted to IPAM concerns two wind energy projects in Uzbekistan: the Uzbekistan Bash Wind Power Plant (WPP) (Project ID 52772) and the Uzbekistan Dzhankeldy WPP (Project ID 52773), hereafter referred to as the "Projects." These Projects were developed by ACWA Power Bash Wind LLC and ACWA Power Dzhankeldy Wind LLC respectively (the Borrowers). The Borrowers are special purpose vehicles (SPVs) established exclusively for the implementation of respective Projects, incorporated in the Republic of Uzbekistan and wholly owned by ACWA Power Company, a Saudi-listed joint stock company (formerly known as the International Company for Water and Power) (ACWA Power, or the Sponsor).[1] ACWA Power has been a client of the EBRD since 2011, with financing extended to multiple ACWA Power projects across Central Asia, the Middle East, and North Africa.

The Uzbekistan Bash WPP involves a senior secured loan of up to USD 150 million on a project finance basis to support the development, design, construction, and operation of a 500 MW wind power plant located in the Gijduvon district of the Bukhara region. Similarly, the Uzbekistan Dzhankeldy WPP entails a senior secured loan of up to USD 150 million for the development, design, construction, and operation of a 500 MW wind power plant in the Peshku district of the Bukhara region. The Projects are co-financed by EBRD, the Asian Development Bank (ADB), Deutsche Investitions- und Entwicklungsgesellschaft (DEG), Proparco, the OPEC Fund for International Development (OPEC Fund), and several commercial banks.

These Projects represent two of the pilot wind energy initiatives led by ACWA Power in partnership with the Government of Uzbekistan as part of the country's strategy to attract private investment in the energy generation sector. They are intended to play a pivotal role in diversifying Uzbekistan's energy

[1] For the purposes of this Report and the IPAM process, the two Borrowers (SPVs) and the Sponsor (ACWA Power) will be referred to interchangeably as the Client.

supply by increasing the share of renewable resources and encouraging private sector participation. The Projects are designed to contribute to the country's transition toward a low-carbon energy system by reducing its heavy reliance on thermal power generation.

The Projects were approved by the EBRD Board on 19 October 2022 and classified as Category A under the 2019 Environmental and Social Policy (ESP) due to their scale and potential environmental and social impacts. Of relevance to this Request is the fact that the Projects were tagged as Gender SMART (namely, "Gender Additional")[2] under the Bank's Strategy for the Promotion of Gender Equality (2021-2025) and were expected to contribute to increasing women's participation in the renewable energy sector and closing gender gaps. The Projects were structured to promote gender equality across operations and to increase the share of women in management positions by at least five percentage points within three years of signing – a requirement embedded in the Environmental and Social Action Plan (ESAP) Action 2-14.

Construction of permanent facilities at both sites started in March 2023 and was nearing completion by December 2024 (when partial demobilisation had begun). Full commissioning of all wind turbine generators (WTGs) was completed by March 2025 for both the Bash and Dzhankeldy WPPs.

China Energy Engineering Corporation (CEEC) acted as a single Engineering, Procurement and Construction contractor (the EPC contractor) across the two Projects. According to non-technical summaries (NTS) of both Projects, it was expected that the EPC contractor would engage several sub-contractors and there would be a peak workforce of about 700-1000 personnel for the construction of each of the wind farms and OHTL (overhead transmission lines).

Both Projects entered the operational phase in March 2025, with contractor demobilisation substantially completed by June 2025 (save for warranty crew), with full contractor demobilisation expected by June 2027.

Processing to Date

The Request was received by IPAM on 19 May 2024. However, due to fear of retaliation from the Client, the Requester asked IPAM not to proceed with registration until 22 October 2024. The Request was registered under Case 2024/04 as it met the criteria for Registration established in Section 2.2 (b) of the PAP, and none of the exclusions set out in Section 2.2 (c) of the PAP applied at that stage. In addition, the IPAM team requested a formal Management Response which was sent to IPAM on 21 November 2024.

The Requester asked for confidentiality due to fear of reprisals and asked to have her complaint considered under the Compliance function only. As such, the Case was transferred to Compliance directly after registration, where the team initiated the Compliance Assessment process.

[2] Under the EBRD Strategy for the Promotion of Gender Equality 2021-2025, the Gender SMART tag differentiates four levels, with the top two levels qualifying for Gender SMART: 1) Gender Transition Impact where gender objectives and subsequent activities are integrated as part of transition impact, and gender is one of the two main objectives of the project; and 2) Gender Additional where gender objectives and subsequent activities are integrated as part of non-financial additionality, and gender is a deliberate goal but not primary objective.

The Compliance Assessment stage has a standard duration of 60 business days. The PAP establishes that two criteria must be met to initiate an investigation:

i. upon preliminary consideration, it appears that the Project may have caused, or may be likely to cause, direct or indirect and material harm to the Requesters (or, if different, the relevant Project-affected People); and
ii. there is an indication that the Bank may not have complied with a provision of the Environmental and Social Policy (including any provision requiring the Bank to monitor Client commitments); or the Project-specific provisions of the Access to Information Policy, in force at the time of Project approval.

For Case 2024/04, due to a high workload and limited team capacity within IPAM, the Compliance Assessment was concluded in 2026. On 29 September 2026, the Requester informed IPAM that she had decided to withdraw the Request because she feared retaliation by the Client if the Case proceeded.

In handling cases, IPAM seeks to avoid exposing Requesters to further harm, consistent with its commitment to ensuring safe access to the Mechanism. While IPAM may preserve a Requester's confidentiality, assess retaliation risks, and take measures to facilitate safe access to the Mechanism, it is not mandated or equipped to provide protective or enforcement measures on the ground, nor can it ensure that redress will be provided if retaliation occurs. To mitigate the risk of retaliation against the Requester, IPAM has limited the information disclosed in this Report. Nevertheless, based on the information available to and analysed by IPAM by September 2026, the Case would have met the criteria for initiating a Compliance Review: IPAM had identified indications that the Projects may have caused direct or indirect and material harm, and that the Bank may not have complied with the applicable requirements of PR2 at the time of the Request.

Following the Requester's withdrawal, however, IPAM cannot continue processing the Case. The 2019 Project Accountability Policy (PAP) establishes a request-based process and does not foresee the initiation or continuation of a Case where the Requester withdraws, even when: (i) the available information indicates potential harm linked to a possible Bank non-compliance, and (ii) the withdrawal is solely linked to fear of retaliation - as in the present Case.

2. Conclusion and Next Steps

In light of the Requester's withdrawal and IPAM's inability to proceed in the absence of a Requester, IPAM recommends that the Board approve the closure of Case 2024/04.

Following the Board's approval, this Compliance Assessment Report will be published in the Case Registry under Case 2024/04. Publication of the Report will formally conclude the processing of the Case.