



Complaints Report 2025

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Foreword

Dear Readers,

The year 2025 marked a turning point in our journey towards greater transparency, trust, and participation within financial cooperation. Over the past year, we have worked intensively on revising our complaints mechanism on environmental, social, and human rights issues. Our guiding standards remain the UN Guiding Principles on Business and Human Rights (UNGP), as well as other international human rights instruments and the standards enshrined in the Sustainability Guideline of KfW Development Bank.

A central component and milestone of the revision process was the comprehensive public consultation conducted between November 2025 and February 2026 with our civil society partners and colleagues from peer organizations. The commitment and constructive participation of all stakeholders provided valuable insights

and momentum to further enhance the complaint mechanism and better align it with the needs of affected parties and international standards.

We now look forward to finally bringing the new policy into force this year. Its comprehensive revision is intended to not only increase the accessibility and effectiveness of the mechanism but also to build the foundation for even more responsible practices in our projects.

I am personally very pleased about this progress too, as this topic is very close to my heart. It is very important to me to see our new complaint mechanism through to the next milestone - the publication and entry into force of the new policy and the start of the rollout of the mechanism - while I am still in my role as member of the Executive Board of KfW.

We would like to take this opportunity to thank everyone who supported and helped shape this important process - your openness, your critical feedback, and a shared commitment to improvement have proved essential.

I invite you to review the following pages for an overview of the complaints received during the 2025 reporting period and to learn more about the consultation process and the final steps leading up to the implementation of the revised complaint mechanism.

I hope you find our 2025 complaints report informative and inspiring.



Christiane Laibach

Christiane Laibach

Member of KfW Group's Executive Board

Complaints in numbers

In the 2025 reporting year, there were almost as many admissible complaints as in the previous year. Of these, 76 percent have already been resolved.

41 complaints relating to projects of KfW Development Bank were registered in the 2025 reporting period. Of these, 29 were declared admissible. In particular, complaints are not registered or are declared inadmissible if:

- no link to a KfW-funded project can be found;
- the individual submitting the complaint cannot be contacted or remains anonymous even after being asked for their details;
- the complaint does not relate to the individual submitting the complaint, or the individual does not represent the person concerned;
- the complaint is procurement-related or there is an indication of criminal offences.

22 of the admissible complaints in 2025 could be resolved during the reporting period, while seven remained in progress. Additionally, two complaints from 2023 and one complaint from 2024 also remained in progress at the end of the reporting period.

A complaint is considered resolved once the matter has been reviewed, processed, and - where applicable - the measures agreed upon have been implemented. The individuals who submitted the complaint are involved accordingly and receive a response regarding their concern.

How do we receive complaints?

We receive complaints regarding projects funded by KfW Development Bank through various channels. As in previous years, most submissions were sent directly to the Central Complaints Office (42%), followed by regional offices (29%) and project teams (21%). The remaining complaints were submitted through other internal channels.

To ensure prompt processing, we recommend contacting us directly via the online form or by email (FZ-Complaints@kfw.de), as forwarding may cause delays.

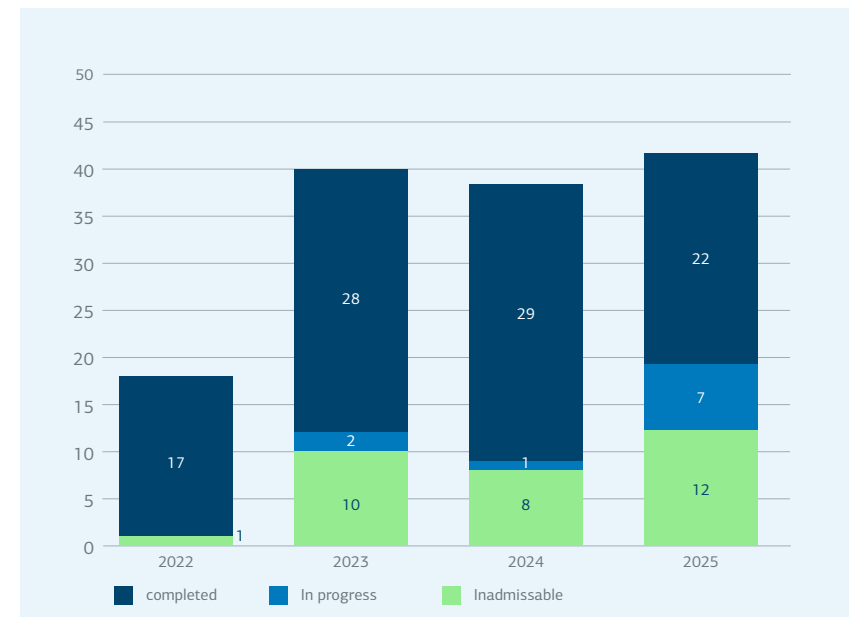


Figure 1 – Registered complaints as of December 31, 2025

Complaints in numbers

Who is submitting the complaints?

In general, affected individuals and communities, as well as their authorized representatives, have the option of filing a complaint with KfW Development Bank. Affected parties may be represented by enterprises, citizens' initiatives, or non-governmental organizations (NGOs). In the 2025 reporting period, just as in previous years, private individuals constituted the largest group of complainants (79%), followed by groups and citizens' initiatives (21%).

The continued high proportion of private individuals suggests that the complaint mechanism has low formal requirements for filing complaints.

What is the subject matter of the complaints?

Of the admissible complaints, 18 concerned environmental, social, and human rights impacts of projects, in particular issues related to resettlement and expropriation, as well as occupational safety and/or disputes over salary payments. Other topics concerned governance aspects, such as objections to project planning or complaints against project staff.

In the classification of complaints, only the predominant and most significant concern is considered and listed in each case. However, a lack of information is also a recurring issue, and concerns regarding negative environmental impacts or health risks can often be resolved through information-sharing measures and by engaging affected communities.

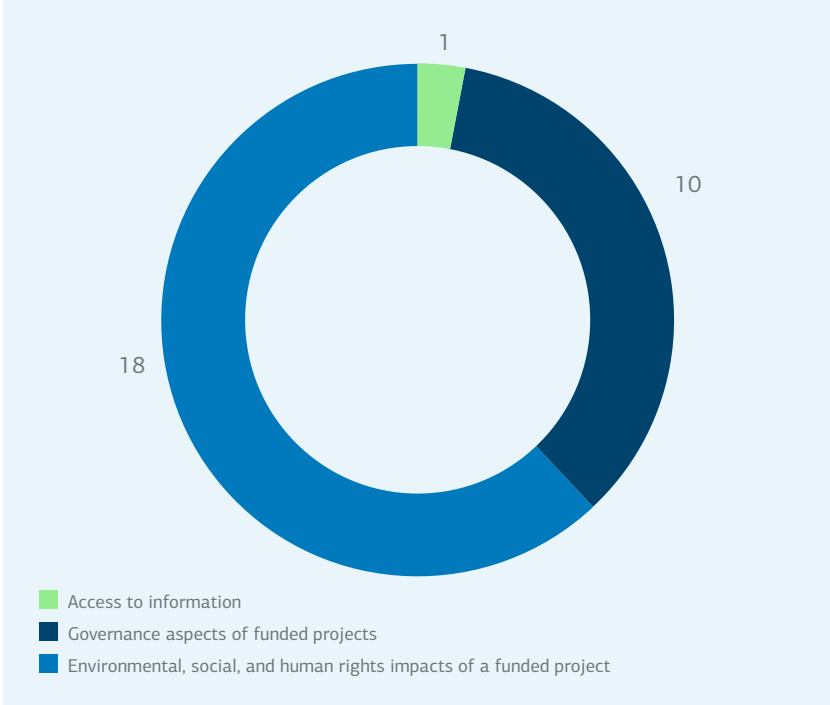


Figure 2 – admissible complaints by subject matter (2025)

Which regions do the complaints originate from?

In 2025, the majority of complaints originated from projects in Europe/Asia (45%) and MENA (25%). In total, the 29 complaints were distributed across 16 countries. Most of the admissible complaints concerned projects in Pakistan with five cases, Albania with four cases, as well as Lebanon and Jordan with three cases each.

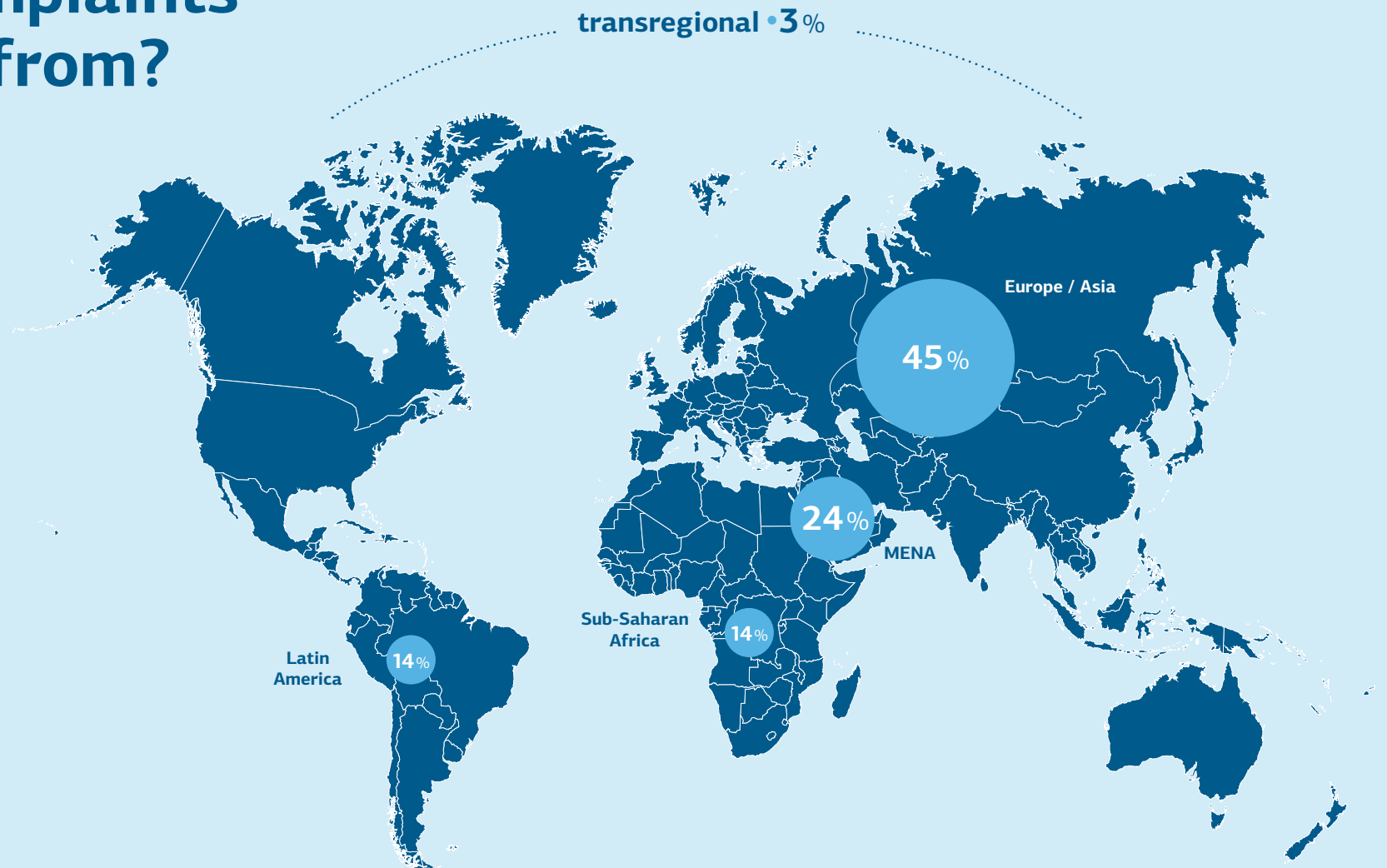


Figure 3 – Distribution of admissible complaints by region in 2025



Revision of the complaint mechanism:

Consultation and implementation of the new policy

Plastic recycling in Indonesia

Over the past year and a half, we have worked intensively to put the work of the Central Complaints Office (CCO) of KfW Development Bank on a new footing and to make it significantly more transparent, accessible and sustainable.

Between November 2025 and February 2026, the CCO conducted a comprehensive public consultation on the draft of the new complaints policy in order to refine it in collaboration with peers, civil society, and academia. Through online workshops and written submissions, the CCO gathered concrete proposals for revision and ideas for complaint handling, benefiting from the practical experience of peers and the expertise of participants.

The consultation revealed broad recognition of the progress made, at the same time important feedback was gathered on topics such as the CCO's independence and the transparency of the complaints handling process. The consultation report, which will be published alongside the final policy and made available on the CCO website [[Complaints | KfW Development Bank](#)],

provides a comprehensive overview of the comments received and our response to them.

A key element of the new policy is a clearly structured admissibility review process. Going forward, the assessment on whether a complaint meets the formal requirements and falls within the mechanism's scope, will be conducted in a more systematic and transparent manner. The results of the admissibility review, as well as the subsequent processing of complaints, will be recorded in a regularly updated **public register**.

Following the admissibility review, a preliminary assessment will determine the suitable procedure for further processing of the complaint. Subject to the case in question and with the consent of the complainant, the following procedures are available:

- The **Prior Resolution** process seeks to find solutions that can be implemented quickly and pragmatically among the parties involved.
- The **Dispute Resolution** process relies on structured mediation and dialogue to resolve conflicts amicably.

- The **Compliance Review** process examines whether KfW has complied with its own environmental, social, and human rights standards.

Another key component of the mechanism is its focus on **remedial actions** at the project level, aiming to achieve concrete and effective solutions for those affected, e.g. through adjustments to the project or measures to prevent further harm. Special attention is also given to **protection against reprisals**. The mechanism provides for measures to identify risks to complainants at an early stage and to safeguard those affected as best as possible within the given framework, for example through confidential handling of information and adapted procedural steps. The goal is to ensure that people can raise their concerns without fear of negative consequences.

Beyond handling complaints, the mechanism also serves an important future-oriented

function: it acts as a tool for **institutional learning**. Insights gained from complaints should be systematically evaluated in order to improve processes and to avoid risks in future projects at an early stage. In this way, the complaint mechanism not only helps resolve specific cases, but also strengthens the quality and effectiveness of financial cooperation in the long term.

We would like to express our sincere gratitude to all participants for the constructive and valuable feedback received during the public consultation. As an institution, we reaffirm our commitment to ensuring an effective, impartial, and transparent complaints-handling process that meets the requirements of the UN Guiding Principles on Business and Human Rights as well as international best practices. We view our ongoing development as a continuous process and are committed to continuing to address the legitimate concerns of those affected in a sustainable and responsible manner in the future.



Midelt Wind Farm in Morocco.

Overview of Complaints in 2025

Nr.	Projects	Sector	Country	Type of complaint	As of: 31 December 2025
1	Health Financing Phase II	Health	Pakistan	Environmental, social, and human rights impacts of a funded project	Resolved
2	Education for All in Times of Crisis III	Education	Turkey	Environmental, social, and human rights impacts of a funded project	Resolved
3	Water and Basic Sanitation Services and Sustainable Land Management in Somaliland	Urban Development	Somalia	Governance aspects of funded operations	Resolved
4	Strengthening the drought resilience of pastoral and agro-pastoral communities in the Afar Region	Other social infrastructure and services	Ethiopia	Governance aspects of funded operations	Resolved
5	Energy Efficiency Sector Program: Electricity Transmission	Energy	Albania	Environmental, social, and human rights impacts of a funded project	Resolved
6	Energy Efficiency Sector Program: Electricity Transmission	Energy	Albania	Environmental, social, and human rights impacts of a funded project	Resolved
7	School Construction Program II	Education	Jordan	Environmental, social, and human rights impacts of a funded project	Resolved
8	Employment Promotion for Palestinian Refugees in Lebanon, Phases IV and V	Peace & Security	Lebanon	Governance aspects of funded operations	Resolved
9	Accompanying Measure: Khyber Pakhtunkhwa Regional Infrastructure Fund	Other social infrastructure and services	Pakistan	Governance aspects of funded operations	Resolved
10	Fonds National de Développement Agricole (FNDA)	Finance	Benin	Governance aspects of funded operations	Resolved
11	Climate-Friendly Urban Mobility III	Urban Development	India	Environmental, social, and human rights impacts of a funded project	Resolved
12	Urban Adaptation to Climate Change in Central America – Honduras Component	Urban Development	Honduras	Environmental, social, and human rights impacts of a funded project	Resolved
13	Municipal Development Program MDLF X	Urban Development	Palestinian Territories	Environmental, social, and human rights impacts of a funded project	Resolved
14	Waste Water Disposal in Central America	Other	Nicaragua	Governance aspects of funded operations	Resolved
15	Water Sector Program IV	Urban Development	Albania	Environmental, social, and human rights impacts of a funded project	Resolved

Overview of Complaints in 2025

Nr.	Projects	Sector	Country	Type of complaint	As of: 31 December 2025
16	Promoting sustainable supply chains	Finance	Global	Access to information	Resolved
17	Pilot Investment Program for the Implementation of the Peace Agreement at the Local Level	State and Civil Society	Colombia	Governance aspects of funded operations	Resolved
18	Promoting Employment for Palestinian Refugees in Lebanon	Peace and Security	Lebanon	Governance aspects of funded operations	Resolved
19	Energy Efficiency Sector Program: Electricity Transmission	Energy	Albania	Environmental, social, and human rights impacts of a funded project	Resolved
20	School Construction Program	Education	Jordan	Environmental, social, and human rights impacts of a funded project	Resolved
21	Integration Prospects for Migrant Women and Support for Host Communities	Peace & Security	Ecuador	Governance aspects of funded operations	In progress
22	Climate Change and Internal Migration Facility - Climate Bridge Fund	Other social infrastructure and services	Bangladesh	Governance aspects of funded operations	In progress
23	Microfinance Initiative for Sub-Sahara-Africa	Finance	Rwanda	Governance aspects of funded operations	In progress
24	Financing facilities for urban development	Urban Development	India	Environmental, social, and human rights impacts of a funded project	In progress
25	Reconstruction of municipal infrastructure and services in Beirut and Bourj Hammoud	Other social infrastructure and services	Lebanon	Environmental, social, and human rights impacts of a funded project	Resolved
26	Promotion of Renewable Energy and Energy Efficiency	Energy	Pakistan	Environmental, social, and human rights impacts of a funded project	In progress
27	Accompanying measure for the Regional Infrastructure Fund in Khyber Pakhtunkhwa Province	Urban Development	Pakistan	Environmental, social, and human rights impacts of a funded project	Resolved
28	Support for reforms in Jordan's education sector – school construction	Education	Jordan	Environmental, social, and human rights impacts of a funded project	In progress
29	Accompanying measure for the Regional Infrastructure Fund in Khyber Pakhtunkhwa Province	Urban Development	Pakistan	Environmental, social, and human rights impacts of a funded project	In progress



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