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# ESG-related violations as exclusion grounds?



**Bayartsetseg Jigmiddash**  
*Green Climate Fund (GCF)*

With over 20 years of experience, Bayaraa leads the Prevention workstream of the Independent Integrity Unit at GCF, the multilateral fund for climate projects in developing countries, which investigates allegations of fraud, corruption, misconduct, and other Prohibited Practices in GCF-funded activities. Bayaraa previously served as the Secretary of State of the Ministry of Justice and Home Affairs of Mongolia, as well as the Legal Advisor to the President of Mongolia.



**Chiawen Kiew**  
*European Bank for Reconstruction and Development (EBRD)*

Chiawen is an international expert who has significant experience in anti-corruption controls, compliance, and sanctions. He currently is the Associate Director for Investigations at the EBRD, where he oversees investigations of corruption, fraud, and other misconduct in EBRD-financed projects and advises the Bank on identifying and mitigating such risks. He also advises the Chief Compliance Officer on international anti-corruption policies, as well as enforcement and debarment practices of other MDBs.



**Roland Stein**  
*BLOMSTEIN*

Admitted to practice in Germany, Roland has been advising clients for more than 15 years. He has considerable experience regarding public procurement compliance (exclusion, debarments, self-cleaning), incl. advice on sanctions imposed by national authorities, the World Bank and other multilateral development banks. He is acting as a World Bank admitted monitor.



**Salomé Lemasson**  
*Rahman Ravelli*

Admitted to practice in France and Germany, Salomé has extensive experience assisting and representing major corporations and individuals in criminal proceedings and cross-border investigations, before French courts and foreign jurisdictions. Salomé has developed a recognized expertise handling investigations by MDBs and negotiating settlement agreements.

