

INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES

In the arbitration proceeding between

ABH HOLDINGS S.A.

Claimant

v.

UKRAINE

Respondent

(ICSID Case No. ARB/24/1)

PROCEDURAL ORDER NO. 3

Members of the Tribunal

Prof. Bernard Hanotiau, President of the Tribunal

Mr. Francis Xavier SC, Arbitrator

Prof. Sean D. Murphy, Arbitrator

Secretary of the Tribunal

Mr. Yuichiro Omori

Assistant to the President of the Tribunal

Ms. Iris Raynaud

11 December 2025

1. This Procedural Order (“**PO**”) is issued in ICSID Case No. ARB/24/1, between ABH Holdings S.A. (“**ABHH**” or “**Claimant**”) and Ukraine (“**Ukraine**” or “**Respondent**”), initiated pursuant to the Agreement between the Belgo-Luxembourg Economic Union and the Government of Ukraine on the Reciprocal Promotion and Protection of Investments, dated 20 May 1996, which entered into force on 27 July 2001 (“**Treaty**”).

I. ABRIDGED PROCEDURAL BACKGROUND

2. The Tribunal will describe below the procedural history of this case only insofar as it relates to the Parties’ document production requests.
3. On 7 October 2024, the Tribunal issued PO No. 1, establishing the calendar of the arbitration and other procedural rules governing the arbitration.
4. On 20 December 2024, Claimant filed its Memorial (“**Memorial**”).
5. On 10 September 2025, Respondent filed its Counter-Memorial and Objections to Jurisdiction (“**Counter-Memorial**”).
6. On 14 October 2025, the Parties filed their document production requests.
7. On 4 November 2025, the Parties filed their responses and objections to the other Party’s document production requests.
8. On 25 November 2025, Respondent filed its replies to Claimant’s objections and submitted its Document Production Schedule to the Tribunal.
9. On 26 November 2025, Claimant filed its replies to Respondent’s objections and submitted its Document Production Schedule to the Tribunal.

II. THE TRIBUNAL’S ANALYSIS AND DECISIONS

10. The Tribunal’s orders on the Parties’ document production requests have been guided by § 16 of PO No. 1, which reads as follows:

“16.1. Within the time limit set in **Annex B**, each Party may request from the other Party the production of documents or categories of documents within the other Party’s possession, custody or control. Such a request for production shall identify each document or narrow category of documents sought with precision, in the form attached in **Annex C** hereto (“**Document Production Schedule**”), in both Word and pdf format, specifying why the document sought is relevant to the dispute and material to the outcome of the case. The

reasons for each request shall not exceed 250 words. Such a request shall not be copied to the Tribunal, the Secretary of the Tribunal or the Assistant to the President of the Tribunal.

16.2. The Tribunal recommends that the number of requests per Party shall be reasonable.

16.3. Within the time limit set forth in **Annex B**, the other Party shall either produce the requested documents or, using the Document Production Schedule provided by the first Party, submit its reasons for its failure or refusal to produce responsive documents (objections).

16.4. Within the time limit set forth in **Annex B**, the requesting Party may seek an order for the production of the documents requested sought and not produced, in which case it shall reply to the other Party's objections in that same Document Production Schedule. At the same time, it shall submit the Word and pdf copies of the Document Production Schedule to the Tribunal.

16.5. The Parties shall make no submissions in respect of the steps set out in §§ 16.1 to 16.3 above other than those incorporated in the Document Production Schedules.

16.6. On or around the date set forth in **Annex B**, the Tribunal will, at its discretion, rule upon the production of the documents or categories of documents having regard to the legitimate interests of the Parties and all the relevant circumstances, including applicable privileges and if appropriate the burden of proof.

16.7. The Tribunal may for this purpose refer to the IBA Rules on the Taking of Evidence in International Arbitration 2020 in regard to matters concerning the gathering or taking of evidence, that are not otherwise covered by this procedural order or the Arbitration Rules. Documents ordered by the Tribunal to be disclosed shall be produced within the time limit set forth in the procedural calendar.

16.8. Documents which the Tribunal orders to be produced shall be communicated directly to the requesting Party without copying the Tribunal. Documents so communicated shall not be considered to be on record unless and until the requesting Party subsequently files them as exhibits in accordance with § 17 below.

16.9. In addition, the Tribunal may order a Party to produce documents on its own initiative at any time. In that case, the documents shall be submitted to the other Party and to the Tribunal in accordance with § 17 below and shall be considered to be on record.

16.10. If a Party fails to produce documents ordered by the Tribunal, the Tribunal may deem, in light of all circumstances including the reasons advanced by a Party to explain its inability to produce any given document, that the document is adverse to the interests of that Party.

16.11. Copies of documentary evidence shall be assumed to be authentic unless specifically objected to by a Party, in which case the Tribunal will determine whether authentication is necessary". [bold in the original and emphases added]

11. Articles 3 and 9 of the IBA Rules on the Taking of Evidence in International Arbitration 2020 (“**IBA Rules**”) provide as follows:

“Article 3 Documents

[...]

3. A Request to Produce shall contain:

(a) (i) a description of each requested Document sufficient to identify it, or (ii) a description in sufficient detail (including subject matter) of a narrow and specific requested category of Documents that are reasonably believed to exist; in the case of Documents maintained in electronic form, the requesting Party may, or the Arbitral Tribunal may order that it shall be required to, identify specific files, search terms, individuals or other means of searching for such Documents in an efficient and economical manner;

(b) a statement as to how the Documents requested are relevant to the case and material to its outcome; and

(c) (i) a statement that the Documents requested are not in the possession, custody or control of the requesting Party or a statement of the reasons why it would be unreasonably burdensome for the requesting Party to produce such Documents, and

(ii) a statement of the reasons why the requesting Party assumes the Documents requested are in the possession, custody or control of another Party. [...]

7. Either Party may, within the time ordered by the Arbitral Tribunal, request the Arbitral Tribunal to rule on the objection. The Arbitral Tribunal shall then, in consultation with the Parties and in timely fashion, consider the Request to Produce and the objection. The Arbitral Tribunal may order the Party to whom such Request is addressed to produce any requested Document in its possession, custody or control as to which the Arbitral Tribunal determines that (i) the issues that the requesting Party wishes to prove are relevant to the case and material to its outcome; (ii) none of the reasons for objection set forth in Article 9.2 applies; and (iii) the requirements of Article 3.3 have been satisfied. Any such Document shall be produced to the other Parties and, if the Arbitral Tribunal so orders, to it.

[...]

Article 9 Admissibility and Assessment of Evidence

[...]

2. The Arbitral Tribunal shall, at the request of a Party or on its own motion, exclude from evidence or production any Document, statement, oral testimony or inspection for any of the following reasons:

- (a) lack of sufficient relevance to the case or materiality to its outcome;
- (b) legal impediment or privilege under the legal or ethical rules determined by the Arbitral Tribunal to be applicable;
- (c) unreasonable burden to produce the requested evidence;
- (d) loss or destruction of the Document that has been shown with reasonable likelihood to have occurred;
- (e) grounds of commercial or technical confidentiality that the Arbitral Tribunal determines to be compelling;
- (f) grounds of special political or institutional sensitivity (including evidence that has been classified as secret by a government or a public international institution) that the Arbitral Tribunal determines to be compelling; or
- (g) considerations of procedural economy, proportionality, fairness or equality of the Parties that the Arbitral Tribunal determines to be compelling”. [bold in the original and emphases added].

12. Based on the above, the Tribunal has considered the Parties’ requests, objections and replies. The Tribunal’s decisions on the document production requests are set out in the Document Production Schedules attached to this Procedural Order: **Annex A** (Claimant’s Schedule) and **Annex B** (Respondent’s Schedule).
13. Pursuant to the amended procedural calendar agreed by the Parties and approved by the Tribunal on 25 September 2025, the Parties shall produce the ordered documents by 13 January 2026.

III. RESERVED DECISIONS BY THE TRIBUNAL

14. The Tribunal notes that Respondent has objected to several of Claimant’s document requests (“**Claimant’s Document Requests**”) listed in Annex A. Respondent invokes, *inter alia*, governmental privilege, pre-trial secrecy, NBU secrecy, and banking secrecy, all under Ukrainian law (“**Respondent’s Privilege/Secrecy Objections**”).
15. Having regard to the Parties’ legitimate interests and all the relevant circumstances, the Tribunal reserves its decision on the production of certain requests, as set out below.
16. First, regarding Respondent’s Privilege/Secrecy Objections based on “governmental privilege” under Ukrainian law, the Tribunal will proceed as follows:

- 16.1. The Tribunal directs Respondent to comment, except with respect to any aspects of the request that has been denied, on the following Claimant's Reply to Objections:
- 16.1.1. Claimant's Document Request No. 1 on Item Nos. 3 and 5.
 - 16.1.2. Claimant's Document Request No. 6 on Item Nos. 1 and 2.
 - 16.1.3. Claimant's Document Request No. 7 on Item Nos. 1 and 2.
 - 16.1.4. Claimant's Document Request No. 11 on Item Nos. 1, 4, and 5.
 - 16.1.5. Claimant's Document Request No. 12 on Item Nos. 4, 7, and 9.
 - 16.1.6. Claimant's Document Request No. 13 on Item No. 4.
 - 16.1.7. Claimant's Document Request No. 14 on Item No. 4.
 - 16.1.8. Claimant's Document Request No. 16 on Item Nos. 1, 2, 3, and 4.
 - 16.1.9. Claimant's Document Request No. 18 on Item No. 2.
 - 16.1.10. Claimant's Document Request No. 19 on Item Nos. 1, 3, 4, 5, and 6.
 - 16.1.11. Claimant's Document Request No. 20 on Item Nos. 1, 2, 3, and 4.
 - 16.1.12. Claimant's Document Request No. 21 on Item Nos. 1 and 2.
 - 16.1.13. Claimant's Document Request No. 22 on Item Nos. 1, 2, 3, 4, and 5.
 - 16.1.14. Claimant's Document Request No. 25 on Item Nos. 1 and 3.
 - 16.1.15. Claimant's Document Request No. 26 on Item Nos. 1, 2, and 3.
 - 16.1.16. Claimant's Document Request No. 27 on Item Nos. 1, 2, and 3.
 - 16.1.17. Claimant's Document Request No. 28 on Item Nos. 1 and 2.
 - 16.1.18. Claimant's Document Request No. 29 on Item No. 1.
 - 16.1.19. Claimant's Document Request No. 33.

- 16.1.20. Claimant's Document Request No. 35 on Item Nos. 1 and 2.
- 16.1.21. Claimant's Document Request No. 36 on Item Nos. 1, 2, and 3.
- 16.1.22. Claimant's Document Request No. 37.
- 16.1.23. Claimant's Document Request No. 38 on Item Nos. 1, 2, 3, and 4.
- 16.1.24. Claimant's Document Request No. 39 on Item Nos. 1, 2, 3, and 4.
- 16.1.25. Claimant's Document Request No. 40 on Item Nos. 1 and 2.
- 16.1.26. Claimant's Document Request No. 41 on Item Nos. 1 and 2.
- 16.1.27. Claimant's Document Request No. 42 on Item Nos. 1, 2, and 3.
- 16.1.28. Claimant's Document Request No. 44 on Item Nos. 1 and 2.
- 16.1.29. Claimant's Document Request No. 50 on Item Nos. 1 and 2.
- 16.1.30. Claimant's Document Request No. 51 on Item Nos. 1, 2, 3, 4, 5, 6, 7, 8, and 9.
- 16.1.31. Claimant's Document Request No. 52 on Items Nos. 1, 2, and 3.
- 16.1.32. Claimant's Document Request No. 53 on Item Nos 1, 2, 3, 4, and 5.
- 16.1.33. Claimant's Document Request No. 54 on Items Nos. 1 and 2.
- 16.1.34. Claimant's Document Request No. 55 on Items Nos. 1 and 2.
- 16.1.35. Claimant's Document Request No. 58.
- 16.1.36. Claimant's Document Request No. 59.
- 16.1.37. Claimant's Document Request No. 60 on Items Nos. 1 and 2.
- 16.1.38. Claimant's Document Request No. 62.
- 16.1.39. Claimant's Document Request No. 64 on Items Nos. 1, 2, 3, 4, and 6.

- 16.1.40. Claimant's Document Request No. 70 on Item No. 2.
- 16.2. In connection with the relevant items on Claimant's Document Requests set out in § 16.1, the Tribunal directs Respondent to clarify: (i) the applicable legal framework invoked, with an English translation of the relevant excerpts; (ii) how "governmental privilege" applies to each item; (iii) how the "official" classification of the documents falls within Article 9.2. of the IBA Rules; and (iv) whether permission for disclosure may be obtained and, if so, the procedure to do so.
- 16.3. Respondent shall submit its comments and clarifications, as set out in §§ 16.1 and 16.2 of this PO, by 5 January 2026. Following receipt of Respondent's submission, Claimant will be afforded an opportunity to submit its final comments by 21 January 2026.¹ The Parties' submissions shall be strictly limited to these issues.
- 16.4. The Tribunal will issue its decision on the relevant items on Claimant's Document Requests set out in § 16.1 upon receipt of both submissions.
17. Second, regarding Respondent's objections based on "pre-trial secrecy" under Ukrainian law, the Tribunal will proceed as follows:
- 17.1. The Tribunal directs Respondent to comment, except with respect to any aspects of the request that has been denied, on the following Claimant's Reply to Objections:
- 17.1.1. Claimant's Document Request No. 6 on Item Nos. 3 and 4.
- 17.1.2. Claimant's Document Request No. 7 on Item Nos. 3 and 4.
- 17.1.3. Claimant's Document Request No. 8 on Item Nos. 1 and 2.
- 17.1.4. Claimant's Document Request No. 9.
- 17.1.5. Claimant's Document Request No. 11 on Item Nos. 6 and 7.

¹ The deadline granted to Respondent for submitting its comments and clarifications, namely 5 January 2026, was set taking into account the overlap with the upcoming holiday season. Since Claimant is not affected by any such overlap, its deadline is shorter by one week.

- 17.1.6. Claimant's Document Request No. 12 on Item Nos. 1, 5, and 6.
- 17.1.7. Claimant's Document Request No. 13 on Item Nos. 1 and 2.
- 17.1.8. Claimant's Document Request No. 14 on Item Nos. 1 and 2.
- 17.1.9. Claimant's Document Request No. 69 on Item No. 2.
- 17.1.10. Claimant's Document Request No. 70 on Item No. 1.
- 17.2. In connection with the relevant items on Claimant's Document Requests set out in § 17.1, the Tribunal directs Respondent to clarify: (i) the applicable legal framework invoked, with an English translation of the relevant excerpts; (ii) how "pre-trial secrecy" applies to each item; (iii) how the "pre-trial secrecy" classification of the documents falls within Article 9.2. of the IBA Rules; and (iv) whether permission for disclosure may be obtained and, if so, the procedure to do so.
- 17.3. Respondent shall submit its comments and clarifications, as set out in §§ 17.1 and 17.2 of this PO, by 5 January 2026. Following receipt of Respondent's submission, Claimant will be afforded an opportunity to submit its final comments by 21 January 2026. The Parties' submissions shall be strictly limited to these issues.
- 17.4. The Tribunal will issue its decision on the relevant items on Claimant's Document Requests set out in § 17.1 upon receipt of both submissions.
- 18. Third, regarding Respondent's Privilege/Secrecy Objections based on "NBU secrecy" under Ukrainian law, the Tribunal will proceed as follows:
 - 18.1. The Tribunal directs Respondent to comment, except with respect to any aspects of the request that has been denied, on the following Claimant's Reply to Objections:
 - 18.1.1. Claimant's Document Request No. 15 on Item Nos. 1, 2, 4, 5, 6, 7, 8, 9, and 10.
 - 18.1.2. Claimant's Document Request No. 17 on Item Nos. 1 and 2.

- 18.1.3. Claimant's Document Request No. 49 on Item Nos. 1 and 2 (a)(b)(c)(d)(e)(f)(g).
- 18.1.4. Claimant's Document Request No. 51 on Item Nos. 1, 2, 3, 4, 5, 6, 7, 8, and 9.
- 18.2. In connection with the relevant items on Claimant's Document Requests set out in § 18.1, the Tribunal directs Respondent to clarify: (i) how the Law of Ukraine "On the National Bank of Ukraine" and the "Resolution of the NBU's Board on 17 July 2001 No. 276" apply to each item, with an English translation of the relevant excerpts; (ii) how the asserted classification of the documents falls within Article 9.2. of the IBA Rules; and (iii) whether permission for disclosure may be obtained and, if so, the procedure to do so.
- 18.3. Respondent shall submit its comments and clarifications, as set out in §§ 18.1 and 18.2 of this PO, by 5 January 2026. Following receipt of Respondent's submission, Claimant will be afforded an opportunity to submit its final comments by 21 January 2026. The Parties' submissions shall be strictly limited to these issues.
- 18.4. The Tribunal will issue its decision on the relevant items on Claimant's Document Requests set out in § 18.1 upon receipt of both submissions.
- 19. Finally, regarding Respondent's Privilege/Secrecy Objections based on "banking secrecy" under Ukrainian law, the Tribunal will proceed as follows:
 - 19.1. The Tribunal directs Respondent to comment, except with respect to any aspects of the request that has been denied, on the following Claimant's Reply to Objections:
 - 19.1.1. Claimant's Document Request No. 17 on Item Nos. 1 and 2.
 - 19.1.2. Claimant's Document Request No. 22 on Item Nos. 1, 2, 3, 4, and 5.
 - 19.1.3. Claimant's Document Request No. 23 on Item No. 2.
 - 19.1.4. Claimant's Document Request No. 61 on Item Nos. 1 and 2.

- 19.2. In connection with the relevant items on Claimant's Document Requests set out in § 19.1, the Tribunal directs Respondent to clarify: (i) the applicable legal framework invoked, with an English translation of the relevant excerpts; (ii) how "banking secrecy" applies to each item; (iii) how the "banking secrecy" classification of the documents falls within Article 9.2. of the IBA Rules; and (iv) whether permission for disclosure may be obtained and, if so, the procedure to do so.
- 19.3. Respondent shall submit its comments and clarifications, as set out in §§ 19.1 and 19.2 of this PO, by 5 January 2026. Following receipt of Respondent's submission, Claimant will be afforded an opportunity to submit its final comments by 21 January 2026. The Parties' submissions shall be strictly limited to these issues.
- 19.4. The Tribunal will issue its decision on the relevant items on Claimant's Document Requests set out in § 19.1 upon receipt of both submissions.

On behalf of the Tribunal,

[signed]

Prof. Bernard Hanotiau
President of the Tribunal
Date: 11 December 2025

ANNEX A – [REDACTED]

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ANNEX B. [REDACTED]

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