International Centre for Settlement of Investment Disputes

Case No. ARB/24/8

Ricardo Filomeno Duarte Ventura Leitão Machado (Portugal)

Claimant

v.

Republic of Angola

Respondent

CONSOLIDATED LIST OF CLAIMANT'S EXHIBITS

11 September 2025

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Exhibits submitted with the Request for Arbitration		
No.	Description	Date
C-1	Mr Machado's Portuguese passport	27 June 2019
C-2	Statement by Mr Machado pursuant to Rule 2(2)(c)(ii) of the Institution Rules (Spanish)	16 February 2024
C-3	Confirmation of attorney's authorization issued by Mr Machado (Spanish)	16 February 2024
C-4	Certificate from the Commercial Registry of Luanda regarding Aenergy (with informal translation into English)	22 April 2022
C-5	Statement issued by Aenergy on the identity of its shareholders (with informal translation into English)	14 February 2024
C-6	Presidential Order No. 161/17 authorizing funding of USD 1,100,000,000 for the 13 Contracts between Aenergy and Angola (with informal translation into English)	5 July 2017
C-7	GE notice of transfer of ownership to Aenergy	30 June 2016
C-8	GE notice of transfer of ownership to Aenergy	31 March 2017
C-9	GE notice of transfer of ownership to Aenergy	29 June 2017
C-10	GE notice of transfer of ownership to Aenergy	30 June 2017
C-11	Presidential Order No. 155/19 on the unilateral termination of the 13 Contracts between Aenergy and Angola (with informal translation into English)	23 August 2019
C-12	MINEA's Unilateral Termination Decision (with informal translation into English)	30 September 2019
C-13	SDNY Grand Jury Indictment against Wilson da Costa	17 January 2023
C-14	Transcript of Preliminary Detention Order Hearing in the Federal Court of New York (SDNY)	13 December 2023
C-15	Request for preventive seizure of Aenergy's Four Turbines (with informal translation into English)	4 October 2019
C-16	Angola's response to Mr Machado's notification for the amicable settlement of the dispute (with informal translation into English)	8 December 2022

C-17	Ruling of the Provincial Court of Luanda on the preventive seizure of Aenergy's Four Turbines (with informal translation into English)	5 December 2019	
C-18	Order of the Provincial Court of Luanda for the preventive seizure of Aenergy's Four Turbines (with informal translation into English)	6 December 2019	
C-19	Angola's lawsuit against Aenergy, filed in the Provincial Court of Luanda (with informal translation into English)	2 March 2020	
C-20	MINEA's assessment of installation works in the Ondjiva Power Plant (with informal translation into English)	18 March 2022	
C-21	Presidential Order No. 177/21 authorising the opening of a public procurement procedure for various works at thermoelectric power plants (with informal translation into English)	26 October 2021	
C-22	Presidential Order No. 60/22 for the execution of projects with ordinary resources of the Angolan State and their inclusion in the Public Investment Program "PIP" (with informal translation into English)	16 March 2022	
C-23	Aenergy's request to the Provincial Court of Luanda (with informal translation into English)	22 April 2022	
C-24	Letter from Aenergy to IGAPE (with informal translation into English)	22 April 2022	
C-25	Aenergy's request to the Provincial Court of Luanda (with informal translation into English)	24 May 2022	
C-26	Notification from Mr Machado to Angola for the amicable settlement of the dispute (with informal translation into English)	9 June 2022	
C-27	Proof of the wire transfer for the right of presentation (Portuguese)	19 February 2024	
	Exhibits submitted with the Claimant's Response to Rule 41 Objection		
No.	Description	Date	
C-28	"Former GE Exec Guilty Of Faking Docs In \$1.1B Power Deal", Law360	18 November 2024	
C-29	Letter on the transportation of the Four Turbines and Google Earth images	30 November 2020	
C-30	Press release announcing the installation of two turbines in the Malembo Power Plant (with informal translation into English)	15 August 2022	

C-31	Extract from GRD website indicating installation of two turbines in the Odjiva Power Plant	1 May 2022
C-32	Angola's Brief on Appeal from the United States District Court for the Southern District of New York	13 October 2021
C-33	E-mail from Willy Ireri to Sharad Jain (GE Capital)	14 January 2019
C-34	E-mails exchanged between Brad Galvin and Ciel da Conceição	28 December 2017
	Exhibits submitted with the Statement of Claim	
No.	Description	Date
C-35	Action Plan of the Energy and Water Sector 2013-2017 (with informal translation into English)	1 April 2013
C-36	Action Plan of the Energy and Water Sector 2018-2022	1 July 2018
C-37	Memorandum of Understanding between GE and the Government of Angola	24 June 2013
C-38	Framework Agreement between Aenergy, S.A. and GE Packaged Power, Inc.	30 June 2016
C-39	Citation to a preparatory hearing in proceeding No. 34/20-D issued by the Provincial Court of Luanda (with informal translation into English)	15 May 2025
C-40	Gas Turbines Contractual Service Agreement between Aenergy, General Electric International and GE Packaged Power, Exhibit K	31 March 2017
C-41	Contract for Sale of Equipment and Services No. 1049882 between Aenergy and GE Global Parts & Products GmbH	30 March 2017

Expert report submitted with the Statement of Claim	
Description	Date
First Quantum Expert Report by AlixPartners	11 September 2025

Legal Authorities submitted with the Request for Arbitration		
No.	Description	Date
CLA-1	Agreement between the Portuguese Republic and the Republic of Angola on the Promotion and Reciprocal Protection of Investments (with informal translation into English)	22 February 2008
CLA-2	Communication of the Portuguese Ministry of Foreign Affairs on the entry into force of the BIT (with informal translation into English)	7 May 2020
CLA-3	Revision of the Agreement between the Portuguese Republic and the Republic of Angola on the Promotion and Reciprocal Protection of Investments (with informal translation into English)	16 July 2021
CLA-4	Communication from the Portuguese Ministry of Foreign Affairs on the entry into force of the revised version of the BIT (with informal translation into English)	22 December 2021
CLA-5	Informal Spanish translation of the consolidated text of the BIT	22 December 2021
CLA-6	UNCITRAL Rules on Transparency in Investor-State Treaty Arbitrations (Spanish)	16 December 2013
Legal	Authorities submitted with the Claimant's Response to Rul	e 41 Objection
No.	Description	Date
CLA-7	AFC Investment Solutions S.L. v. Colombia, ICSID Case No. ARB/20/16, Award on Respondent's Preliminary Objection Under Rule 41(5) of the ICSID Arbitration Rules (with informal translation into English)	24 February 2022
CLA-8	PNG Sustainable Development Program Ltd. v. Papua New Guinea, ICSID Case No. ARB/13/33, Decision on Respondent's Objections under Rule 41(5)	28 October 2014
CLA-9	Watkins Holdings S.à.r.l. and others v. Spain, ICSID Case No. ARB/15/44, Decision on the Claimants' Preliminary Objections Pursuant to ICSID Arbitration Rule 41(5)	22 January 2024
CLA-10	Manifest Lack of Legal Merit, ICSID Convention Arbitration (2022 Rules)	_

CLA-11	Emmis International Holding, B.V., Emmis Radio Operating, B.V., MEM Magyar Electronic Media Kereskedelmi és Szolgáltató Kft. v. Hungary, ICSID Case No. ARB/12/2, Decision on Respondent's Objection Under ICSID Arbitration Rule 41(5)	11 March 2013
CLA-12	Almasryia for Operating & Maintaining Touristic Construction Co. L.L.C. v. Kuwait, ICSID Case No. ARB/18/2, Award on the Respondent's Application under Rule 41(5) of the ICSID Arbitration Rules	1 November 2019
CLA-13	Civil Procedure Code of Angola (with informal translation into English) (updated version submitted with the Statement of Claim)	28 December 1961
CLA-14	Civil Code of Angola (with informal translation into English)	25 November 1966
CLA-15	Evidence in International Investment Arbitration, Frédéric G. Sourgens, Kabir Duggal, Ian A. Lair, Oxford University Press, 2018, Chapter 2	2018
CLA-16	The Rompetrol Group N.V. v. Romania, ICSID Case No. ARB/06/3, Decision on Jurisdiction and Admissibility	18 April 2008
CLA-17	The Rompetrol Group N.V. v. Romania, ICSID Case No. ARB/06/3, Award	6 May 2013
CLA-18	SGS Société Générale de Surveillance S.A. v. Paraguay, ICSID Case No. ARB/07/29, Award	10 February 2012
CLA-19	Vito G. Gallo v. Canada, PCA Case No. 2008-03, Award	15 September 2011
CLA-20	Alpha Projektholding v. Ukraine, ICSID Case No. ARB/07/16, Award	8 November 2010
CLA-21	Waguih Elie George Siag and Clorinda Vecchi v. Egypt, ICSID Case No. ARB/05/15, Award	1 June 2009
CLA-22	Chevron Corporation and Texaco Petroleum Company v. Ecuador (I), PCA Case No. 2007-02/AA277, Interim Award	1 December 2008
CLA-23	Corfu Channel case (United Kingdom of Great Britain and Northern Ireland v. Albania), International Court of Justice, Judgement	9 April 1949
CLA-24	Evidence in International Investment Arbitration, Frédéric G. Sourgens, Kabir Duggal, and Ian A. Lair, Oxford University Press, 2018, Chapter 8	2018

CLA-25	Consolidated text of the BIT (with informal translation into English)	22 December 2021
CLA-26	International Investment Arbitration Substantive Principles (Second Edition), Oxford International Arbitration Series, Campbell McLachlan, Laurence Shore and Matthew Weiniger, 2017, Chapter 8	2017
CLA-27	S.D. Myers, Inc. v. Canada, UNCITRAL, Partial Award	13 November 2000
CLA-28	Draft Convention on the International Responsibility of States for Injuries to Aliens, Yearbook of the International Law Commission, 1969, Vol.II	1969
CLA-29	Pope & Talbot Inc. v. Canada, UNCITRAL, Interim Award	26 June 2000
CLA-30	Fair and Equitable Treatment in Arbitral Practice, Christoph Schreuer, The Journal of World Investment & Trade, 2005	2005
CLA-31	Swisslion DOO Skopje v. Former Yugoslav Republic of Macedonia, ICSID Case No. ARB/09/16, Award	6 July 2012
CLA-32	Fair and Equitable Treatment: Today's Contours, Rudolf Dolzer, 12 Santa Clara J. Int'l L. 7-33	17 January 2014
CLA-33	CMS Gas Transmission Company v. Argentina, ICSID Case No. ARB/01/8, Award	12 May 2024
CLA-34	Electrabel S.A. v. Hungary, ICSID Case No. ARB/07/19, Award	5 November 2015
CLA-35	Saluka Investments BV v. Czech Republic, UNCITRAL, Partial Award	17 March 2006
CLA-36	Joseph Charles Lemire v. Ukraine (II), ICSID Case No. ARB/06/18, Decision on Jurisdiction and Liability	14 January 2010
CLA-37	ADC Affiliate Limited and ADC & ADMC Management Limited v. Hungary, ICSID Case No. ARB/03/16, Award	2 October 2006
CLA-38	Lion Mexico Consolidated L.P. v. Mexico, ICSID Case No. ARB(AF)/15/2, Award	20 September 2021
CLA-39	Serafin García Armas and Karina García Gruber v. Venezuela, PCA Case No. 2013-03, Final Award	26 April 2019
CLA-40	OI European Group B.V. v. Venezuela, ICSID Case No. ARB/11/25, Award (with informal translation into English)	10 March 2015

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CLA-41	Frontier Petroleum Services Ltd. v. Czech Republic, PCA Case No. 2008-09, Final Award	12 November 2010
CLA-42	Biwater Gauff (Tanzania) Limited v. Tanzania, ICSID Case No. ARB/05/22, Award	24 July 2008
CLA-43	Cengiz İnşaat Sanayi ve Ticaret A.S v. Libya, ICC Case No. 21537/ZF/AYZ, Final Award	7 November 2018
CLA-44	Asian Agricultural Products Ltd. (AAPL) v. Sri Lanka, ICSID Case No. ARB/87/3, Award	27 June 1990
CLA-45	National Grid PLC v. Argentina, UNCITRAL, Award	3 November 2008
CLA-46	Azurix Corp. v. Argentina (I), ICSID Case No. ARB/01/12, Award	14 July 2006
CLA-47	Compañía de Aguas del Aconquija S.A. v. Argentina (I), ICSID Case No. ARB/97/3, Award II	20 August 2007
CLA-48	Compañia del Desarrollo de Santa Elena S.A. v. Costa Rica, ICSID Case No. ARB/96/1, Final Award	17 February 2000
CLA-49	Indirect Expropriation and its Valuation in the BIT Generation, W. Michael Reisman and Robert D. Sloane, 74 BRIT. Y.B. INT'L L., 115-150, 2004	16 November 2004
CLA-50	Antoine Biloune and Marine Drive Complex Ltd. v. Ghana Investments Centre and the Government of Ghana, UNCITRAL, Award on Jurisdiction and Liability	27 October 1989
CLA-51	Rumeli Telekom A.S. and Telsim Mobil Telekomunikasyon Hizmetleri A.S. v. Kazakhstan, ICSID Case No. ARB/05/16, Award	29 July 2008
CLA-52	What Constitutes a Taking of Property Under International Law?, George C. Christie, 38 Brit. Y.B. Int'l L. 307-338, 1962	1962
CLA-53	Société Générale in respect of DR Energy Holdings Limited and Empresa Distribuidora de Electricidad del Este, S.A. v. Dominican Republic, LCIA Case No. UN 7927, Award on Preliminary Objections on Jurisdiction	19 September 2008
CLA- 53(bis)	Société Générale in respect of DR Energy Holdings Limited and Empresa Distribuidora de Electricidad del Este, S.A. v. Dominican Republic, LCIA Case No. UN 7927, Award on Preliminary Objections on Jurisdiction	19 September 2008
CLA-54	Técnicas Medioambientales Tecmed, S.A. v. Mexico, ICSID Case No. ARB(AF)/00/2, Award	29 May 2003

CLA-55	Ascom Group S.A., Anatolie Stati, Gabriel Stati and Terra Raf Trans Traiding Ltd. v. Kazakhstan (I), SCC Case No. 116/2010, Award	19 December 2024	
CLA-56	Generation Ukraine Inc. v. Ukraine, ICSID Case No. ARB/00/9, Award	16 September 2003	
CLA-57	Hydro S.r.l., Costruzioni S.r.l., Francesco Becchetti, Mauro De Renzis, Stefania Grigolon, Liliana Condomitti v. Albania (I), ICSID Case No. ARB/15/28, Award	24 April 2019	
Legal	Authorities submitted with the Claimant's Rejoinder to Ru	le 41 Objection	
No.	Description	Date	
CLA-58	von Pezold and others v. Zimbabwe, ICSID Case No. ARB/10/15, Award	28 July 2015	
CLA-59	Azurix Corp. v. Argentina (I), ICSID Case No. ARB/01/12, Decision on the Application for Annulment of the Argentine Republic	1 September 2009	
CLA-60	Mera Investment Fund Limited v. Serbia, ICSID Case No. ARB/17/2, Decision on Jurisdiction	20 November 2018	
CLA-61	Elsamex, S.A. v. Honduras, ICSID Case No. ARB/09/4, Award (with informal translation into English)	16 November 2012	
CLA-62	MOL Hungarian Oil and Gas Company Plc v. Croatia, ICSID Case No. ARB/13/32, Decision on Respondent's Application under ICSID Arbitration Rule 41(5)	2 December 2014	
	Legal Authorities submitted with the Statement of Claim		
No.	Description	Date	
CLA-63	Public Procurement Law of Angola No. 41/20 (with informal translation into English)	23 December 2025	
CLA-64	M.C.I Power Group L.C. and New Turbine, Inc. v. Ecuador, ICSID Case No. ARB/03/6, Award	31 July 2025	
CLA-65	Fraport AG Frankfurt Airport Services Worldwide v. the Philippines, ICSID Case No. ARB/03/25, Award	16 August 2007	
CLA-66	Philip Morris Brands Sarl et al. v. Uruguay, ICSID Case No. ARB/10/7, Decision on Jurisdiction	2 July 2013	

CLA-67	SGS Société Générale de Surveillance S.A. v. the Philippines, ICSID Case No. ARB/02/6, Decision of the Tribunal on Objections to Jurisdiction	29 January 2004
CLA-68	Elettronica Sicula S.P.A. (ELSI), Judgment, I.C.J. Reports 1989	20 July 1989
CLA-69	Principles of International Investment Law (Second edition), Rudolf Dolzer and Christoph Schreuer, Oxford University Press, 2012 (excerpts)	2012
CLA-70	The "Baby Boom" of Treaty-Based Arbitrations and the Jurisdiction of ICSID Tribunals: Shareholders as "Investors" and Jurisdiction Ratione Temporis, Stanimir Alexandrov, The Law & Practice of International Courts and Tribunals, 4(1), 19-59, 2005	2005
CLA-71	Franck Charles Arif v. Moldova, ICSID Case No. ARB/11/23, Award	8 April 2013
CLA-72	Switzerland-Zimbabwe BIT (1996)	9 February 2001
CLA-73	UNCTAD, Expropriation: A Sequel, 2012	2012
CLA-74	Metalclad Corporation v. Mexico, ICSID Case No. ARB(AF)/97/1, Award	30 August 2000
CLA-75	Telenor Mobile Communications v. Hungary, ICSID Case No. ARB/04/15, Award	13 September 2006
CLA-76	Caratube v. Kazakhstan, ICSID Case No. ARB/13/13, Award	27 September 2017
CLA-77	CME Czech Republic B.V. (The Netherlands) v. Czech Republic, UNCITRAL, Partial Award	13 September 2001
CLA-78	Smurfit Holding B.V. v. Venezuela, ICSID Case No. ARB/18/49, Award	28 August 2024
CLA-79	Harvard Draft Convention on the International Responsibility of States for Injuries to Aliens and explanatory notes, 1961	1961
CLA-80	Tippetts, Abbett, McCarthy, and Stratton v. TAMS-AFFA Consulting Engineers of Iran and others, Iran-United States Claims Tribunal, Award	22 June 1984
CLA-81	Sedco, Inc. v. National Iranian Oil Company and Iran, Iran- United States Claims Tribunal, Interlocutory Award	17 September 1985

CLA-82	Thomas Earl Payne v. Iran, Iran-United States Claims Tribunal, Award	8 August 1986
CLA-83	Wena Hotels v. Egypt, ICSID Case No. ARB/98/4, Award	8 December 2000
CLA-84	UP and C.D Holding Internationale v. Hungary, ICSID Case No. ARB/13/35, Award	9 October 2018
CLA-85	Kardassopoulos v. Georgia, ICSID Case No. ARB/05/18, Award	3 March 2010
CLA-86	Nationalisation Law of Angola No. 3/76 (with informal translation into English)	3 March 1976
CLA-87	Nationalisation Law of Angola No. 1/82 (with informal translation into English)	2 February 1982
CLA-88	Public Appropriation Law of Angola No. 13/22 (with informal translation into English)	25 May 2022
CLA-89	MTD Equity Sdn. Bhd. and MTD Chile S.A. v. Chile, ICSID Case No. ARB/01/7, Award	25 May 2004
CLA-90	Siemens v. Argentina, ICSID Case No. ARB/02/8, Award	17 January 2007
CLA-91	Deutsche Telekom AG v. India, PCA Case No. 2014-10, Interim Award	13 December 2017
CLA-92	Mobil Exploration v. Argentina, ICSID Case No. ARB/04/16, Decision on Jurisdiction and Liability	10 April 2013
CLA-93	LG&E Energy Corp., LG&E Capital Corp. and LG&E International Inc. v. Argentina, ICSID Case No. ARB/02/1, Decision on Liability	3 October 2006
CLA-94	B3 Croatia Courier Coöperatief U.A. v. Croatia, ICSID Case No. ARB/15/5, Excerpts of Award	5 April 2019
CLA-95	UAB Garsu Pasaulis v. Kyrgyzstan, UNCITRAL, Award	8 April 2024
CLA-96	Murphy Exploration & Production Company v. Ecuador, UNCITRAL, Partial Award	6 May 2016
CLA-97	Krederi Ltd. v. Ukraine, ICSID Case No. ARB/14/17, Award	2 July 2018
CLA-98	Bayindir Insaat Turizm Ticaret Ve Sanayi A.S. v. Pakistan, ICSID Case No. ARB/03/29, Award	27 August 2009

CLA-99	Mohammad Ammar Al-Bahloul v. Tajikistan, SCC Case No. V (064/2008), Partial Award on Jurisdiction and Liability	2 September 2009
CLA-100	Deutsche Bank AG v. Sri Lanka, ICSID Case No. ARB/09/02, Award	13 October 2012
CLA-101	Cargill Incorporated v. Poland, UNCITRAL, Award	5 March 2008
CLA-102	Teco Guatemala Holdings LLC v. Guatemala, ICSID Case No. ARB/10/17, Award	19 December 2013
CLA-103	Plama Consortium Limited v. Bulgaria, ICSID Case No. ARB/03/24, Award	27 August 2008
CLA-104	Glencore Finance (Bermuda) Limited v. Bolivia, PCA Case No. 2016-39, Award	8 September 2023
CLA-105	Anglo American PLC v. Venezuela, ICSID Case No. ARB(AF)/14/1, Award	18 January 2019
CLA-106	Global Telecom Holding S.A.E. v. Canada, ICSID Case No. ARB/16/16, Award	27 March 2020
CLA-107	A.M.F. Aircraftleasing Meier & Fischer GmbH & Co. KG v. Czech Republic, PCA Case No. 2017-15, Final Award	11 May 2020
CLA-108	Calculation of compensation and damages in international arbitration (Second edition), Irmgard Marboe, Oxford International Arbitration Series, 2017, Chapter 2	2017
CLA-109	Calculation of compensation and damages in international arbitration (Second edition), Irmgard Marboe, Oxford International Arbitration Series, 2017, Chapter 3	2017
CLA-110	Compensation, Damages, and Restitution, Borzu Sabahi, Noah Rubins, and Don Wallace Jr., Investor-State Arbitration (Second edition), 2019, Chapter XXI	1 September 2019
CLA-111	Factory at Chorzów (Germany v. Poland), PCIJ Series A. No 17, Judgement	13 September 1928
CLA-112	Gold Reserve v. Venezuela, ICSID Case No. ARB(AF)/09/1, Award	22 September 2014
CLA-113	Lemire v. Ukraine, ICSID Case No. ARB/06/18, Award	28 March 2011
CLA-114	Marion Unglaube v. Republic of Costa Rica, ICSID Case No. ARB/08/1-ARB/09/20, Award	16 May 2012

CLA-115	ConocoPhillips v. Venezuela, ICSID Case No. ARB/07/30, Decision on Jurisdiction and Merits	3 September 2013
CLA-116	Valores Mundiales, S.L. y Consorcio Andino, S.L. v. Venezuela, ICSID Case No. ARB/13/11, Award	25 July 2017
CLA-117	Calculation of compensation and damages in international arbitration (Second edition), Irmgard Marboe, Oxford International Arbitration Series, 2017, Chapter 6	2017
CLA-118	Telefónica, S.A. v. Colombia, ICSID Case No. ARB/18/3, Award (with informal translation into English)	12 November 2024
CLA-119	Eurus Energy Holdings Corporation v. Spain, ICSID Case No. ARB/16/4, Award	14 November 2022
CLA-120	Infracapital v. Spain, ICSID Case No. ARB/16/18, Award	2 May 2023
CLA-121	Rusoro Mining v. Venezuela, ICSID Case No. ARB(AF)/12/5, Award	22 August 2016
CLA-122	Flughafen Zürich A.G. and Gestión e Ingenería IDC SA v. Venezuela, ICSID Case No. ARB/10/19, Award (with informal translation into English)	18 November 2014
CLA-123	Karkey Karadeniz Elektrik Uretim A.S. v. Pakistan, ICSID Case No. ARB/13/1, Award	22 August 2017