



Thirty-Third Board Meeting

2014 Annual Report of the Ethics Official

GF/B33/14

Board Information

PURPOSE: This Annual Report of the Ethics Official is provided to the Board for information regarding the activities of the Ethics Official in her support of the Audit and Ethics Committee and in advising departments across the Secretariat over the course of 2014.

I. Executive Summary

1. This paper describes the activities of the Ethics Official in her support of the Audit and Ethics Committee (“AEC”), and in advising various departments in the Secretariat, over the course of 2014 to strengthen the Global Fund’s status as an ethics-based institution.
2. This paper provides (i) background on the current responsibilities of the Ethics Official and an overview of the Global Fund’s existing ethics policy framework; (ii) a summary of the activities undertaken by the Ethics Official and/or the AEC in strengthening the institution’s ethics policies; (iii) a description of the conflict of interest assessment work undertaken by the Ethics Official, including illustrative individual conflict of interest cases addressed by the Ethics Official and the AEC over the reporting period, organized by thematic areas; and (iv) a reflection on the quality and implementation of the Global Fund’s ethics-related policies.
3. The review of the activities undertaken by the Ethics Official shows the increased focus on incorporating ethics and integrity into all aspects of the work of the Global Fund. In addition to policy enhancement efforts, the Ethics Official’s involvement in engaging in conflict of interest assessments for nominees for governance roles, working group members, and the candidates for the position of Inspector General demonstrates the attention being given to integrating ethical principles into activities at the Board and Committee level. These efforts at the governance level are translating into an overall greater awareness of the importance of identifying ethical issues and managing potential conflicts of interest throughout the Global Fund.
4. While awareness, both at the governance and Secretariat level, has grown, there remains significant progress which can be made through updating guidance for individual stakeholders and vigorously implementing new policies, codes and requirements resulting from the Ethics and Integrity Initiative.

II. Background

5. As a consequence of the diversity of interests and perspectives represented by the Global Fund’s stakeholders, it is imperative for the organization to operate in a balanced, ethical, collaborative, transparent and open manner. This mandate resulted in an enhanced focus, under the oversight of the Board Leadership and the AEC, throughout 2014, on better integrating ethical principles in the functioning of the Global Fund, including at the level of the Board.
6. As the Board Leadership has previously noted, a strong ethical foundation is essential to good governance. The efforts over the course of 2014 have aimed at strengthening the trust and confidence placed in the Global Fund and beginning the process of ensuring that each stakeholder is aware of his/her obligations in identifying potential areas where ethical issues may need to be addressed and helping to create an environment where transparency with respect to conflicts of interest and other ethics-related matters is part of the normal course of business.

01 Current Ethics Official Function

7. The position of the Ethics Official was created with the Board’s adoption in 2002 of the Policy on Ethics and Conflict of Interest for Global Fund Institutions (the “Ethics Policy”). As described in the Ethics Policy, the role of the Ethics Official is to support the AEC in identifying and addressing conflicts of interest across the organization.
8. The tasks of the Ethics Official are currently conducted by the Global Fund’s Legal Counsel, with the assistance of staff in the Legal and Compliance Department. The key responsibilities in this regard are: (i) reviewing potential conflicts voluntarily disclosed by Global Fund officials through the

Declaration of Interest form, and making recommendations on the management of such conflicts; (ii) advising the AEC in situations involving allegations or findings of potential conflicts or misconduct by Global Fund officials; (iii) advising various teams in the Secretariat on day-to-day ethics, including conflicts of interest, inquiries; and (iv) development and review of ethics-related policy proposals for consideration by senior management and the AEC, as appropriate, and guidance to internal and external stakeholders.

02 Existing Policy Framework for Ethics

9. The Global Fund has over time established norms of ethical behavior targeted towards specific stakeholders (e.g., grant recipients) or situations (e.g., situations involving potential conflict of interests). These norms have been articulated through a number of ethics-related policies, including:

- a) The Policy on Ethics and Conflict of Interest for Global Fund Institutions (the “Ethics Policy”);
- b) The Standards of Conduct for Contacts with Members of the Global Fund Involved in Funding Decisions (the “Standards of Conduct for Funding Decisions”);
- c) The Code of Conduct for Recipients of Global Fund Resources (the “Recipient Code”);
- d) The Code of Conduct for Suppliers (the “Supplier Code”); and
- e) The Staff Code of Conduct (the “Staff Code”).

10. The Ethics Policy defines conflict of interest in the context of Global Fund operations, and describes the process for identifying and resolving potential conflicts. While the Ethics Policy aims to generally address situations where the objectivity or independence of Global Fund stakeholders may be impacted by factors or interests outside of their individual roles at the Global Fund, it heavily focuses on financial interests. The Policy requires all Global Fund officials, including governance officials, to affirmatively disclose potential conflicts. Accordingly, all Global Fund officials must annually submit a Declaration of Interest Form, which requires a description of any financial interests they have that could relate to the work of the Global Fund. This Form must also be re-submitted in the event of any material change to financial interests and updated on an annual basis.

III. Strengthening Ethics-Related Policies

01 Ethics and Integrity Initiative

11. As part of their commitment to the development of a comprehensive ethics and integrity framework, the Board Leadership launched the Ethics and Integrity Initiative. To oversee this initiative, the Board Leadership established an Ethics Steering Committee consisting of AEC members and senior Global Fund staff. Moreover, an independent expert consultant was engaged to take forward major aspects of this work, in consultation with stakeholders such as the Board, and under the oversight of the Ethics Steering Committee. The Ethics Official served as a member of the Ethics Steering Committee and project managed the ethics consultant’s activities, overseeing all deliverables including core Board policies (the Ethics and Integrity Framework and the development of a dedicated ethics function).

12. Through the Ethics and Integrity Initiative, the Board has approved both an overarching Ethics and Integrity Framework which articulates the Global Fund core ethical values and a proposal for the creation of a dedicated and independent ethics function led by an Ethics Officer. By allowing the ethics function to be carried out by a dedicated ethics office with an Ethics Officer who can take a leadership role in promoting ethics and integrity, additional support, monitoring, training and tools will be available to guide decision-making. Through targeted efforts to consistently train governance members

and staff and begin to reach implementers, ethics can be more efficiently embedded into all of the work of the Global Fund.

13. Based on those foundational decisions, the Board will consider at its Thirty-Third Meeting second-level policies and systems for adoption. These ‘Second Stage’ deliverables consist of (i) the Code of Ethical Conduct for Governance Officials and (ii) Terms of Reference of the Ethics Officer. As the Ethics and Integrity Initiative proceeds, the focus will turn to implementing the initial Board decision and strengthening ethical systems at the operational level, through training programs and policy development targeted towards the needs of grant implementers, Country Coordinating Mechanisms and third-party suppliers (e.g., LFAs).

14. This focus on Ethics and Integrity at the Board level has already produced results which flow through the governance structure and into operations at the Secretariat level. Since the commencement of the Ethics and Integrity Initiative, the Ethics Official has witnessed an increase in ethics-related inquiries and a more focused attempt to ensure compliance with the existing Ethics Policy. As an example, at the Board and Committee level there has been an increase in the percentage of individuals currently in compliance with the annual declaration of interest reporting requirement contained in the Ethics Policy.¹ This increase in awareness is a promising start and it will be important for the dedicated ethics function to use this momentum once it begins more fully embedding ethics into the day-to-day activities of the Global Fund and its operations.

02 Revisions to the Procedure for Retention and Dissemination of Confidential Information

15. At the Second Meeting of the AEC in 2012, the AEC adopted a Procedure for Retention and Dissemination of Confidential Information (the “Confidential Information Procedure”). At the request of the AEC Leadership, in connection with the Eighth Meeting of the AEC in April 2014, the Ethics Official proposed amendments to the Confidential Information Procedure to elaborate upon the obligations of AEC members with respect to maintaining the confidentiality of sensitive AEC deliberations and work product.

16. The Confidential Information Procedure covers all confidential matters brought before the AEC. This includes ethics and conflicts of interest referrals, reports from ongoing OIG investigations, and disciplinary matters reviewed by the AEC. The Procedure does not provide an exhaustive list of confidential matters and rather stipulates that the AEC Leadership will identify confidential matters as such at the outset of any AEC discussion. Confidential matters are recorded within a meeting report held by the Ethics Official and only released to non-AEC members upon instruction of the AEC Leadership. When appropriate, items covered in the confidential meeting report can be redacted as needed and incorporated into the AEC’s reports to the Board. In instances when the Board should be notified of a particular confidential matter, the Confidential Information Procedure stipulates that the AEC Leadership may first raise the issue with the Board Leadership in order to determine the appropriate method for handling such information.

17. In April 2014, the AEC approved certain amendments to the Confidential Information Procedure including (i) instituting special precautions to ensure the security and traceability of documents containing confidential information, (ii) specifically elaborating on the confidentiality obligations of each member of the AEC, the Ethics Official and any invited observers who have access to confidential information, and (iii) the provisions of remedies in the event that such confidentiality obligations are breached.

¹ As of the date of this report, approximately 80% of Board Members and Alternate Board Members and 92% of Committee Members are currently in compliance with the reporting requirement. As a comparison, approximately 42% of Board Members and Alternate Members were in compliance with the requirement in 2013.

IV. Conflict of Interest Assessments During 2014

18. As a function of the Ethics Official's advisory mandate, confidential ethics advice and guidance is provided for officials across the organization, including staff, management, members of advisory bodies, such as the Technical Review Panel, and governance officials. Regular requests for advice cover a broad range of ethics issues, including permissibility of outside activities, gift acceptance, policy advice and support for standard-setting. This advice, particularly with respect to the activities of governance officials, is provided under the oversight of the AEC, which receives regular reports from the Ethics Official on ethics-related matters. Below is a summary of illustrative cases showing the types of conflicts of interest matters reviewed by the Ethics Official and a description of the specific conflict of interest assessments undertaken during 2014. Additional details regarding the scope and level of engagement for the matters described below is attached as Annex A.

01 Illustrative Individual Conflict of Interest Cases

19. During the reporting period for this Report, significant ethics-related matters addressed by the Ethics Official and the AEC concerned (i) potential conflicts of interests arising from governance officials and members of advisory groups whose employers were contracting with Global Fund; (ii) conflicts of interest arising from ongoing disputes with the Global Fund; and (iii) management of potential conflicts faced by Global Fund governance officials who serve concurrently with Global Fund grant recipients.

a) Potential Conflict of Interest Associated with Concurrent Service for the Global Fund while acting as a Contractual Counterparty to the Global Fund

20. Conflicts issues can arise and need to be carefully managed when relating to Global Fund procurement and other activities involving contractual relationships. As an example of the activities of the Ethics Official and AEC in this regard, the AEC, with the assistance of the Ethics Official, addressed several potential conflict of interest concerns resulting from both Board/Committee members and members of advisory groups having a concurrent affiliation with an organization submitting bids and/or negotiating a contract to provide goods and/or services to the Global Fund.

21. In reviewing each of these cases, the AEC and the Ethics Official looked to the facts of the relevant case to ensure that the nature of either the selection review or the origin of the funding for the activities in question did not suggest that any conflicts of interest could have impacted the decision-making process. The AEC and the Ethics Official also recommended safeguard measures be put in place for each case in the interest of transparency going forward and to protect against any real or perceived pressure which could be present for Secretariat staff when negotiating a contract with a member of governance or an advisory group or an organization affiliated with a member of governance or an advisory group.

b) Potential Conflict of Interest Due to Ongoing Dispute

22. The existence of ongoing litigation against the Global Fund initiated by either a current or proposed Board/Committee member or such individual's employer could present a conflict of interest of sufficient materiality to require such individual's recusal from acting as a member of governance. During 2014, the AEC addressed the existence of potential conflicts of interest due to ongoing disputes/litigation concerning individuals either acting in a governance capacity or proposed to act as a member of Global Fund governance.

23. In reviewing cases involving ongoing disputes, the AEC has considered whether the dispute could bias the individual when carrying out functions on behalf of the Global Fund, whether the individual's status as a member of governance could or could be perceived to influence the decision-making at the Global Fund concerning the defense of the organization, and if the existence of a perceived conflict of interest due to the existence of the dispute required recusal in the interest of good governance. For each case, the AEC has balanced protecting an individual's right to bring action against the Global Fund with the necessity of protecting the credibility of the Global Fund governance system.

c) **Managing Potential Conflicts Associated with Concurrent Service for the Global Fund and its Grant Recipients**

24. The Ethics Policy notes that conflicts can occur when members of the Board, its Committees and/or advisory groups hold concurrent professional roles with Global Fund grant recipients. Examples provided in the Ethics Policy include situations where a Board member is involved in advocating for a particular grant proposal or policy that would financially affect an organization to which he/she is affiliated. During the reporting period, the Ethics Official received disclosures from Board and Committee members regarding such concurrent professional roles.
25. With the support of the Ethics Official, the AEC has continued its approach of emphasizing transparency in these matters. Often situations arise where a Board or Committee member's employer is a Global Fund Principal Recipient or Sub-Recipient. In these cases, the AEC has agreed that the appropriate mitigation measure is disclosure by the concerned individual of his/her relationship with the Principal Recipient, and his/her recusal from Board/Committee deliberations for any matter directly relating to that organization.

02 Enhancing Disclosure and Review of Potential Conflicts

26. The Declaration of Interest form is the principal vehicle for raising awareness of the importance of managing conflicts and ensuring full disclosure of any potential conflicts.

27. In line with the updates undertaken in 2013, which require advance submission of the Declaration of Interest form for Board/Committee members, prior to formal appointment, the Ethics Official has been working with the Office of Board Affairs to ensure timely submission of Declaration of Interest forms for all potential new Board and Committee members. A new focus has also been placed on better regulating compliance with the Ethics Policy by members of the Board and Committee who have been delegated authority to attend meetings and are involved in decision making.

28. While the Declaration of Interest form is the principal vehicle for disclosing potential conflicts of interest, the Ethics Official has begun incorporating additional due diligence steps into conflict assessments. Through relying on available internal resources, such as the Office of the Inspector General and the Sourcing Department, the Ethics Official has been able to begin undertaking additional ethics-related screening steps for each assessment, which can be used to help establish more standard screening procedures going forward.

03 Conflicts Assessment for 2014 Committee Nominees

29. As noted above, proposed members of the Board, its Committees or any advisory group are requested to complete the Declaration of Interest Form before their formal appointment. During the 2014 constituency nomination process for positions on the AEC, the Finance and Operational Policy Committee and the Strategy, Investment and Impact Committee, the Ethics Official received completed Declaration of Interest Forms from all proposed candidates.

30. Under the oversight of the AEC, the Ethics Official reviewed these submitted Declaration of Interest Forms and proposed measures to assist in the management of any potential conflicts of interest identified. For the great majority of the candidates, the Ethics Official, in consultation with the AEC, determined that any conflict of interest risks presented could be appropriately managed. In those cases where candidates disclosed the presence of a financial interest, these generally arose from a professional relationship with a Global Fund grant recipient.

04 Conflicts Assessment for Governance Working Groups

31. During the course of 2014, the Board established working groups to focus on specific initiatives, such as the Working Group on Governance and the 2014 Inspector General Ad Hoc Nominations Committee. In an effort to ensure the decision-making processes undertaken by these groups were free from any actual or perceived ethics issues, the Ethics Official reviewed the Declaration of Interest forms received from all members of these working groups. A summary of any disclosures which could potentially result in a conflict of interest and which would require the concerned individuals to be vigilant in identifying any potential conflicts of interest which could arise in the future were reported to the AEC.

05 Conflicts Assessment during the Selection of the Inspector General

32. Consistent with the 2013 selection process, during the 2014 process for selection of the Inspector General, the Board tasked the AEC and the Ethics Official with facilitating a detailed conflict of interest review of the short-listed candidates for the position. In order to hone the process followed in 2013 and better articulate the assessment framework used in assessing the candidates for any real or perceived conflicts of interest, the AEC reviewed and approved certain revisions to the communications to the candidates and the customized Declaration of Interest form.

33. As was the case during the 2013 selection process, the definition of conflict of interest adopted by the AEC was based upon international professional auditing standards, which define conflict of interest as “a situation in which an internal auditor, who is in a position of trust, has a competing professional or personal interest.” As such, the AEC’s working definition of conflict was a situation in which a candidate has a competing professional or personal interest that could have a real or perceived effect on his/her objectivity and independence in fulfilling responsibilities as Inspector General. The assessment exercise was furthermore undertaken with the view that conflicts of interest can be financial or non-financial in nature, and can occur if overseeing assessment of operations for which one was previously responsible.

34. The Ethics Official undertook an assessment, including the review of the declaration of interest forms and CVs for each of the shortlisted candidates and, as needed, engaged in certain follow-up due diligence, which was presented to the AEC to facilitate the AEC’s deliberations.

35. Following a conference call during which the AEC discussed the assessment of conflicts of interest for the candidates, the AEC approved a decision point summarizing the outcome of the conflict of interest assessment and submitted its report to the 2014 Inspector General Ad-hoc Nomination Committee.

06 Day-to-Day Guidance to Secretariat Management and other Staff

36. In addition to the Ethics Official’s work engaging with Board and Committee members, the AEC and Board-led ad hoc working groups, the Ethics Official and other staff in the Legal and Compliance Department address a steady stream of individual and organizational conflict of interest questions and concerns which arise from teams across the Secretariat.

37. Potential individual conflict of interest questions often arise when Secretariat staff are considering engaging in outside appointments or secondments, in relation to offers which may be considered “gifts” under the Ethics Policy, and in connection with other personal or financial interests.

38. In addition to ethics-related inquiries directly involving staff, the Ethics Official provides advice and guidance on a routine basis regarding conflict of interest issues which arise in connection with: reviewing bids or contracting with proposed suppliers to the Global Fund, protecting the independence of the work of advisory group members, ad hoc ethics-related questions which arise with respect to external individuals involved in the work of the Secretariat, potential private sector donors, and the work of Local Fund Agents. While certain teams in the Secretariat have established procedures for involving the Ethics Official and/or the Legal and Compliance Department in conflicts of interest analysis, often questions are raised on an ad hoc basis.

V. Quality and Implementation of Ethics-Related Policies

39. As noted above, historically the Global Fund’s established policies and stated expectations for stakeholders have been articulated through a number of ethics-related policies. While these policies contain valuable and instructive guidance for governance officials, Global Fund staff, members of advisory bodies and those involved in activities financed by the Global Fund, the lack of an overall comprehensive document covering each stakeholder and linking the individual policies has detracted from their effective implementation. Over time, through addressing individual ethics-related questions and issues, it has been clear that, in general, there is a strong desire to make decisions and conduct operations following the highest standards of ethical conduct. However, without greater policy visibility and consistent reinforcement, it can be difficult for stakeholders to be fully aware of the best practices to employ in ensuring transparency and instituting appropriate safeguards to manage conflicts of interest and other ethics-related matters.

40. The policy structure in place during 2014 allowed for the Global Fund to appropriately address any instances of misconduct by its officials and suppliers, to insert safeguards to best protect decision-making from improper influences, and increase transparency around the inherent and inevitable conflicts of interest which must be managed on a routine basis as part of Global Fund governance and operations. However, the efforts of the Ethics and Integrity Initiative have created an opportunity to more effectively integrate ethics-related considerations throughout governance and operations. As we begin to implement the Board’s decisions arising from the Ethics and Integrity Initiative, the clear articulation of the core ethical values applicable to all individuals involved in Global Fund activities and the anticipated focused Codes of Conduct which will directly translate the core values into tangible expectations will give individuals clear guideposts to follow.

41. The Ethics and Integrity Framework will also expand the Ethics Policy to enhance the concept of acting with integrity during decision-making processes, to focus on anti-corruption controls, and to include principles around duty of care, accountability, dignity and respect. This enhanced ethics policy framework and the tailored codes will help to better address the ethical risks the Global Fund faces across operations and in governance activities. However, the effectiveness of the new policy framework will depend on proper implementation. Ensuring that all stakeholders are aware of the core values, reinforcing how the core values directly translate into actions which stakeholders are responsible for proactively taking, and balancing the various interests impacted by the ethics framework across the Global Fund, will be essential for effective implementation.

42. This effective implementation will require dedicated, coordinated, and well-supported efforts. The creation of an ethics office tasked with leading the efforts of the Global Fund to promote ethical values, monitor their implementation and respond to potential ethical misconduct, will be a critical step forward. Due to the complexities which will be involved in reaching stakeholders, monitoring

compliance and conducting the often complex analysis required to address ethics-related questions and concerns raised in the normal course of business, the Ethics Officer will need to be able to adopt a cross-disciplinary approach to leading and directing the Global Fund's approach to ethics. To most effectively fulfill this leadership function, the Ethics Official will need to collaborate with actors, such as the Executive Director, the Grant Management Department, the Office of the Inspector General, the Risk Department and the Ombudsman, across the Global Fund's governance, operations, and oversight functions.

VI. Conclusion

43. As noted at the outset of this Report, the full integration of ethical principles in the operations of the Global Fund is essential to ensuring that the organization operates in a balanced, collaborative and transparent manner. The enhanced focus on ethics over the course of 2014 has already resulted in progress towards incorporating ethics into all aspects of the Global Fund's work and making discussions around managing potential conflicts of interest part of the normal course of business. Although improvements can be noted, there is still significant room for better integration. The Global Fund can foster an environment where ethics and integrity are deeply rooted. Looking forward, with a focus on accountability and continued Board, Committee, and management support, the clear desire by stakeholders to have all Global Fund decisions made and operations conducted following the highest standards of ethical behavior can become a reality.

OVERVIEW OF CONFLICT OF INTEREST ASSESSMENTS DURING 2014

Matters Reviewed with the Audit and Ethics Committee	<p><u>AEC Executive Session Cases:</u></p> <ul style="list-style-type: none"> • Ethics Official presents the AEC with a Confidential Memorandum containing analysis of ethics matters for consideration during Executive Sessions • During 2014, the AEC took a full review of seven individual ethics cases which ranged in complexity from matters directly addressed during Executive Session to matters which required considerable additional fact finding and coordination with other parties (such as Board Leadership, Secretariat management, and the OIG) • These cases emerged from personal declarations of interest, whistleblower allegations, OIG investigations and Secretariat referrals
	<p><u>Committee Nominations Process:</u></p> <ul style="list-style-type: none"> • Prior to the appointment of members of the three standing Committees in 2014, the Ethics Official conducted a conflict of interest review under the oversight of the AEC • More than 30 candidates for committee membership were reviewed and mitigation measures were proposed to address those conflicts of interest which could be managed
	<p><u>Governance Working Groups:</u></p> <ul style="list-style-type: none"> • The AEC requested that the Ethics Official review declarations of interest for each member of various working groups established to assist in projects led by the Board and its Committees • During 2014, working groups such as the Working Group on Governance and the 2014 Inspector General Ad Hoc Nominations Committee received specific attention from the Ethics Official
	<p><u>Selection of the Inspector General</u></p> <ul style="list-style-type: none"> • Consistent with the process undertaken in 2013, the Ethics Official assisted the AEC with its conflict of interest assessment of the short-listed candidates for the position of Inspector General • As part of this review, the Ethics Official assessed the candidates' declaration of interest forms and employment history, undertook necessary follow-up due diligence, and prepared a report for the Ad Hoc Nominations Committee

Matters Reviewed with Secretariat Teams	<p><u>Ad-hoc Requests from or Concerning Individual Staff Members</u></p> <ul style="list-style-type: none"> • On a routine basis, the Ethics Official receives questions from staff regarding outside appointments, the receipt of gifts, and other personal or financial interests which may result in a conflict of interest • Matters concerning potential employees or loans are referred by the HR Department • In addition, questions often arise in connection with contracting matters from the Sourcing Department where a potential counterparty is identified as having a potential link to a Global Fund official or other staff member • During 2014, the Ethics Official and staff in the Legal Department addressed dozens of questions which arose concerning individuals, in addition to the DOIs reviewed in connection with the annual requirement
	<p><u>Local Fund Agent Conflict of Interest Assessments</u></p> <ul style="list-style-type: none"> • During the course of 2014, the Ethics Official and staff in the Legal Department assisted the LFA Coordination team in updating (i) its conflict of interest policies and guidance and (ii) handling potential conflict of interest declarations submitted by LFAs • In addition to updating the conflict of interest guidance available to LFAs, approximately 50 potential conflict of interest declarations completed and submitted by LFAs were reviewed with the LFA Coordination Team and the relevant Country Teams • In addition, several instances of potential conflicts of interest for individual LFA experts were addressed
	<p><u>Technical Review Panel Secretariat</u></p> <ul style="list-style-type: none"> • The TRP Secretariat coordinates the work of the TRP and is instrumental in coordinating with the Ethics Official and staff in the Legal Department to review various conflict of interest matters raised by members of the TRP pursuant to the Ethics Policy or the Conflict of Interest Guidelines for TRP Members • Throughout the year, and particularly prior to each TRP meeting, extensive conflict of interest reviews are conducted to ensure that any needed recusals are managed when assigning concept notes to an individual TRP member and numerous conflict issues are addressed to help inform the TRP Leadership's decision-making on ethics matters • Close, consistent coordination with the TRP Secretariat has resulted in 100% of all serving TRP Members participating in concept note reviews being in compliance with the Declaration of Interest reporting requirement under the Ethics Policy
	<p><u>Other Individuals Associated with Global Fund Activities</u></p> <ul style="list-style-type: none"> • The Ethics Official also addressed queries related to a specific instance of potential ethical misconduct/conflict of interest which arose in connection with an individual associated with Global Fund activities but not directly subject to any specific Global Fund ethics-related policy