

Ethics Office 2025 Annual Report and Opinion

55th Board Meeting

9 – 10 July 2026, Geneva, Switzerland

GF/B55/07B

For Information

Annual Opinion and Outlook

Evaluating ethics risk, effectiveness, and priorities amid rising external pressures

Context

- Significant external pressures: global health disruption, geopolitical instability, resource constraints
- Reduced funding limiting preventive ethics activities
- **Inherent E&I risk: Very High**
- **Residual risk: High ▲**

EO Opinion

- Strong ethics and integrity risk mitigation framework in place (policies, controls, programs)
- Risks **appropriately managed where controllable**
- No known unaddressed ethical breaches under existing policies

Key Challenges

- **External drivers** beyond organizational control
- **Funding constraints**
- Increasing **likelihood of risk materialization**

Mitigations

- Clear standards of ethical behavior
- Training & awareness initiatives
- Confidential speak-up mechanisms
- Accountability
- Maturing core ethics activities to our context (aligned with Ethics & Compliance Initiative framework)

Outlook (GC8)

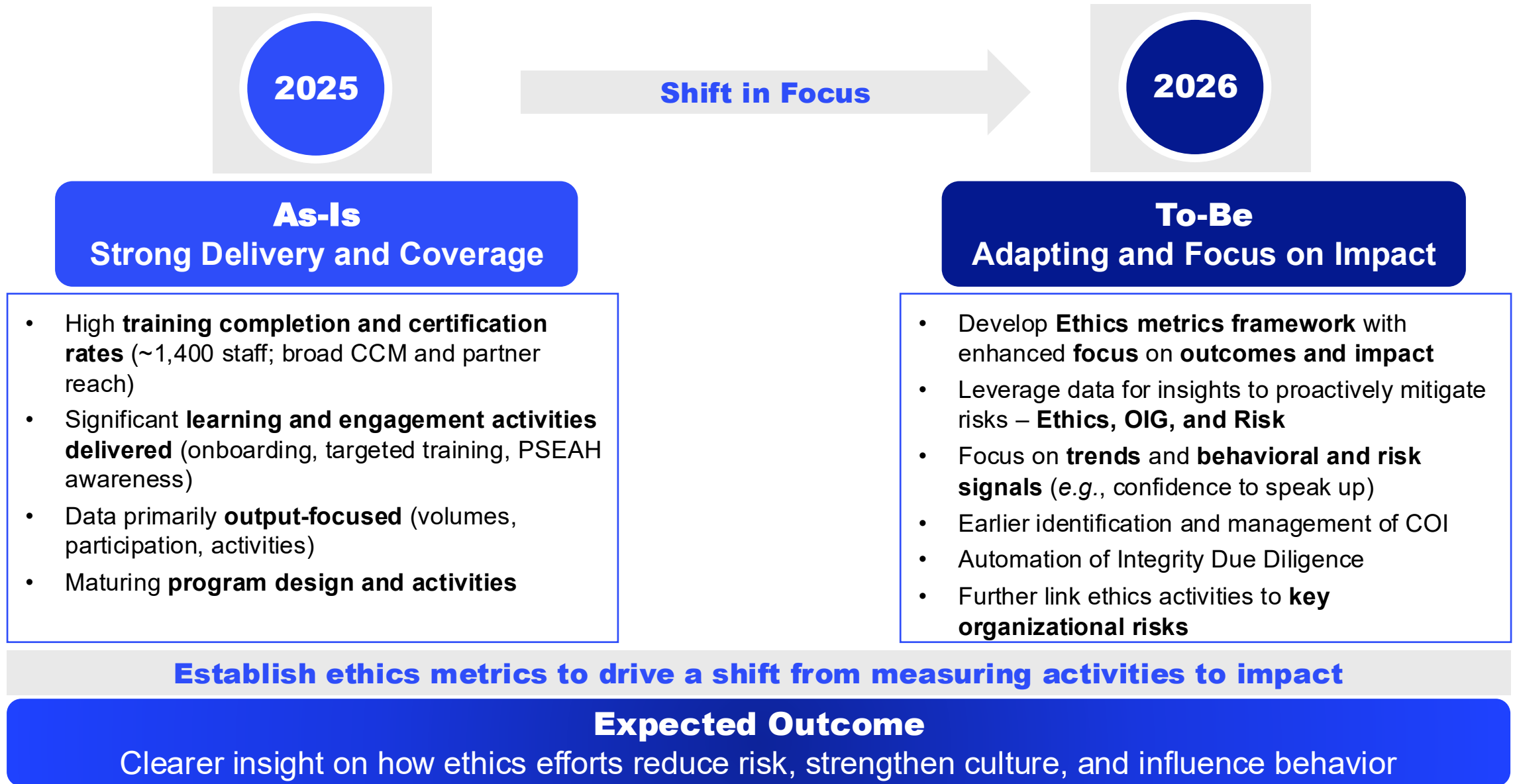
- Further shift to **risk-based prioritization**
- Increased use of **automation & AI**
- Acceptance of **higher risk levels** likely
- Board to define **ethics risk appetite (2027)**

Promoting Ethics and Integrity in all we do and mitigating risks is a shared responsibility across the Secretariat, Board, donors, partners and implementers.

2025 Ethics Program Review and Progress Update

Ethics at Work

Strong delivery in 2025; evolving to demonstrate effectiveness



Strengthening Ethical Culture to Enhance Organizational Resilience

Reinforcing the foundations of ethical culture across the partnership

Clear Standards of Conduct	Learning & Engagement for Understanding	Accountability Mechanisms
2025 Delivered ✓ • Code of Conduct for Employees refreshed to clarify expectations and reinforce values • Updates initiated for COI Policy and CoC for Recipients 2026 Focus 🔍 • Finalize and roll out updated policies (COI, CoC-R, Employee Handbook, PSEAH Framework) • Strengthen whistleblowing framework enabling staff to raise concerns safely, with a confidential and consistent process that protects against retaliation	2025 Delivered ✓ • Targeted ethics training delivered based on risk exposure • Regional CCM Ethics Officers deployed for in-country support 2026 Focus 🔍 • Launch mandatory ethics training for all staff • Expand targeted training on COI, PSEAH, fraud & corruption	2025 Delivered ✓ • IJM refreshed; roles clarified across Ethics, HR, Ombuds • Ethics Investigation & Response function established • Confidential reporting channel for staff misconduct launched 2026 Focus 🔍 • Apply a consistent investigations framework: all cases follow a standardized methodology and uniform quality standards • Strengthen consistency, fairness, and transparency • Enhance anti-retaliation protections and coordination with OIG
Impact Clearer expectations aligned with key risks	Impact Stronger understanding and application of standards	Impact Greater trust, consistent enforcement, and protection for reporting

Mitigating Ethics Risks

Targeted programs addressing the most significant ethics risks

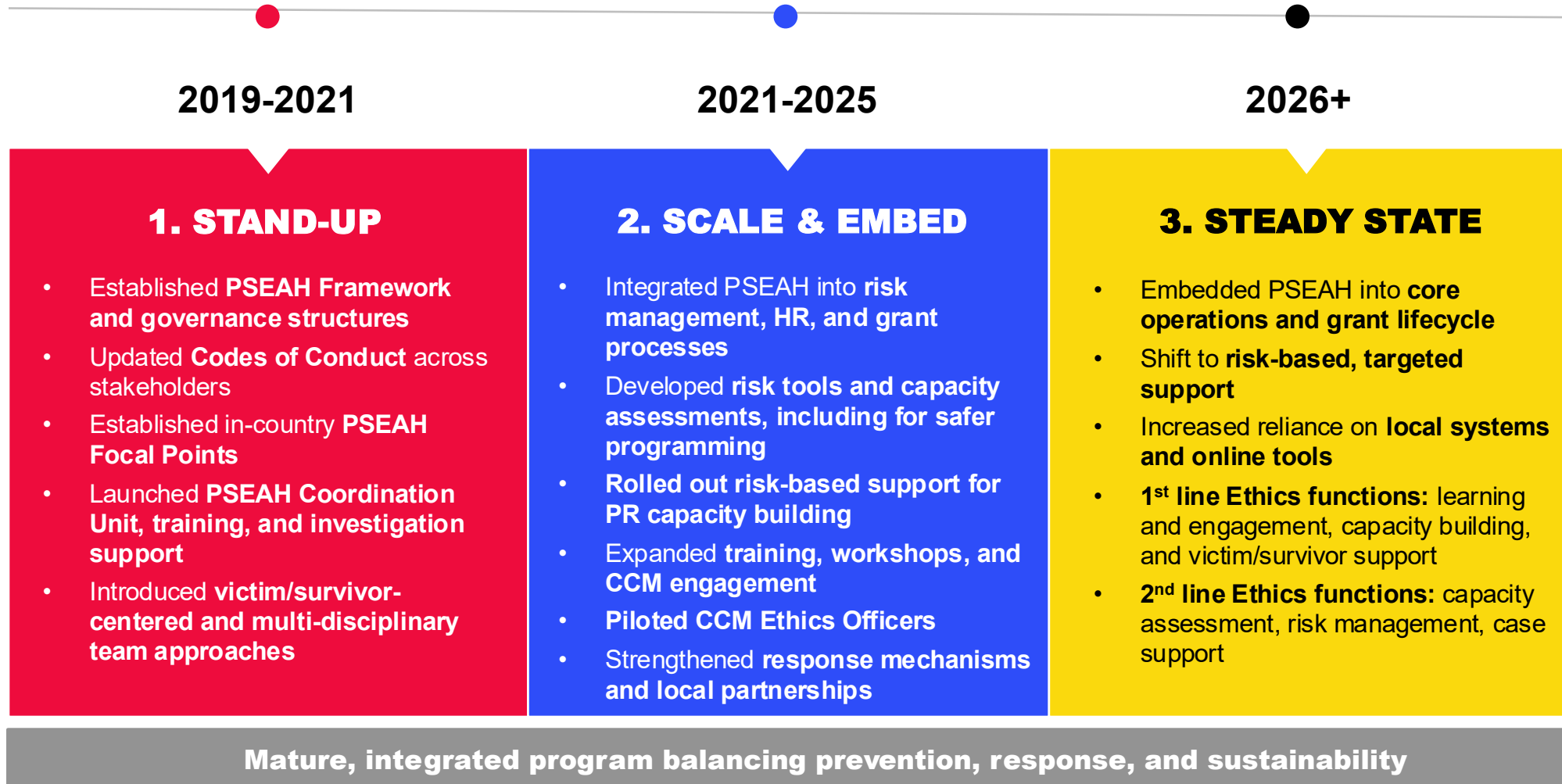
Conflicts of Interest	Fraud & Corruption Prevention	Protection from Sexual Exploitation, Abuse & Harassment (PSEAH)
2025 Delivered ✓ - Enhanced COI management procedures and guidance 300+ disclosures reviewed; 100+ COI cases mitigated - Targeted training for staff and governance officials 2026 Focus 🔍 - Provide risk-prioritized and targeted CCM capacity assessment and support, besides COI trainings and disclosures - Strengthen disclosure processes through new digital tool	2025 Delivered ✓ 1,300+ individuals and 700+ organizations screened (IDD) - Enhanced due diligence in high-risk contexts - Strengthened governance-level IDD and training 2026 Focus 🔍 - Automate due diligence and apply risk-based prioritization - Strengthen collaboration with Risk and OIG - Gradually embed IDD execution within core business units, with EO overseeing compliance - Strengthen IDD to enable strategic, well-informed Board & Executive hiring - GC8: Apply risk-based enhanced IDD across all pharma & health product suppliers	2025 Delivered ✓ - PSEAH program embedded in core processes - Capacity building across high-risk countries - Survivor-centered response to reported cases 2026 Focus 🔍 - Operationalize steady-state, risk-based approach - Expand tools and capacity building for GC8 readiness
Impact Stronger integrity and transparency in decision-making	Impact More proactive prevention of fraud and corruption risks	Impact Safer programs and stronger protection for beneficiaries

Ethics Programmatic Deep Dive

Protection from Sexual Exploitation, Abuse, and Harassment

PSEAH Program Evolution: From Stand-Up to Steady State

The journey to embed victim/survivor-centered practices into prevention & response



PSEAH in Practice: Key Achievements in 2025

Key Insights

- Program has reached **operational maturity**
- Case trends reflect **external instability, not reduced underlying risk**

Prevention & Capacity Building

- Capacity building delivered across **38 Principal Recipients in highest-risk countries**
- **Supported CCM-led beneficiary awareness campaigns** in 6 countries
- Continued **training and engagement across stakeholders (CCMs, implementers, staff)**

Risk Management & Embedding

- Strengthened **integration into grant management and risk processes**
- Ongoing **technical support to implementers** based on risk exposure
- Strengthened ownership of mitigation activities by **implementers and Secretariat functions**

Response & Survivor Support

- **Victim/survivor support** facilitation maturity
- **Technical advice to implementers for SEAH** cases outside of OIG mandate
- Continued application of **trauma-informed, multidisciplinary response model**
- Strengthened **reporting and response protocols**

Stronger prevention systems, embedded risk management, and consistent victim/survivor-centered response



PSEAH: Adapting to a Steady-State Model

Maintaining impact in a constrained and evolving risk environment

Key Strategic Shifts

From	To
Broad support	Risk-based prioritization
Central delivery	Local ownership and systems
In-person training	Hybrid / digital learning model
Program expansion	Efficiency and sustainability

2026 Priorities

- Update **PSEAH Framework, Code of Conduct for Recipients, and Victim/Survivor Support Services Protocol**
- Expand **online, on-demand guidance for implementers and CCMs**
- Deliver **targeted in-person capacity building workshops**
- Strengthen **implementer capacity via Regional Ethics Officers**
- Provide **technical support during GC8 grant-making and risk assessments**
- **Victim/survivor support through local PSEAH Focal Points**

What does this mean for the organization?

- **Risk-based prioritization** of technical assistance for partners in capacity building and case response
- Greater reliance on **in-country partners for victim/survivor support facilitation**
- Expanded **use of online/on-demand resources**
- Increased ownership across stakeholders, with **Ethics Office as an escalation point**

Sustainable, resource-conscious approach to mitigating SEAH risks while maintaining a victim/survivor-centered response