

Ethics Office Annual Report and Opinion 2024

GF/B53/10
53rd Board Meeting
7-9 May 2025

For Board Information

This document presents the Ethics Office Annual Report and Opinion for 2024 to the 53rd Board Meeting, held in Geneva, Switzerland, on 7-8-9 May 2025.

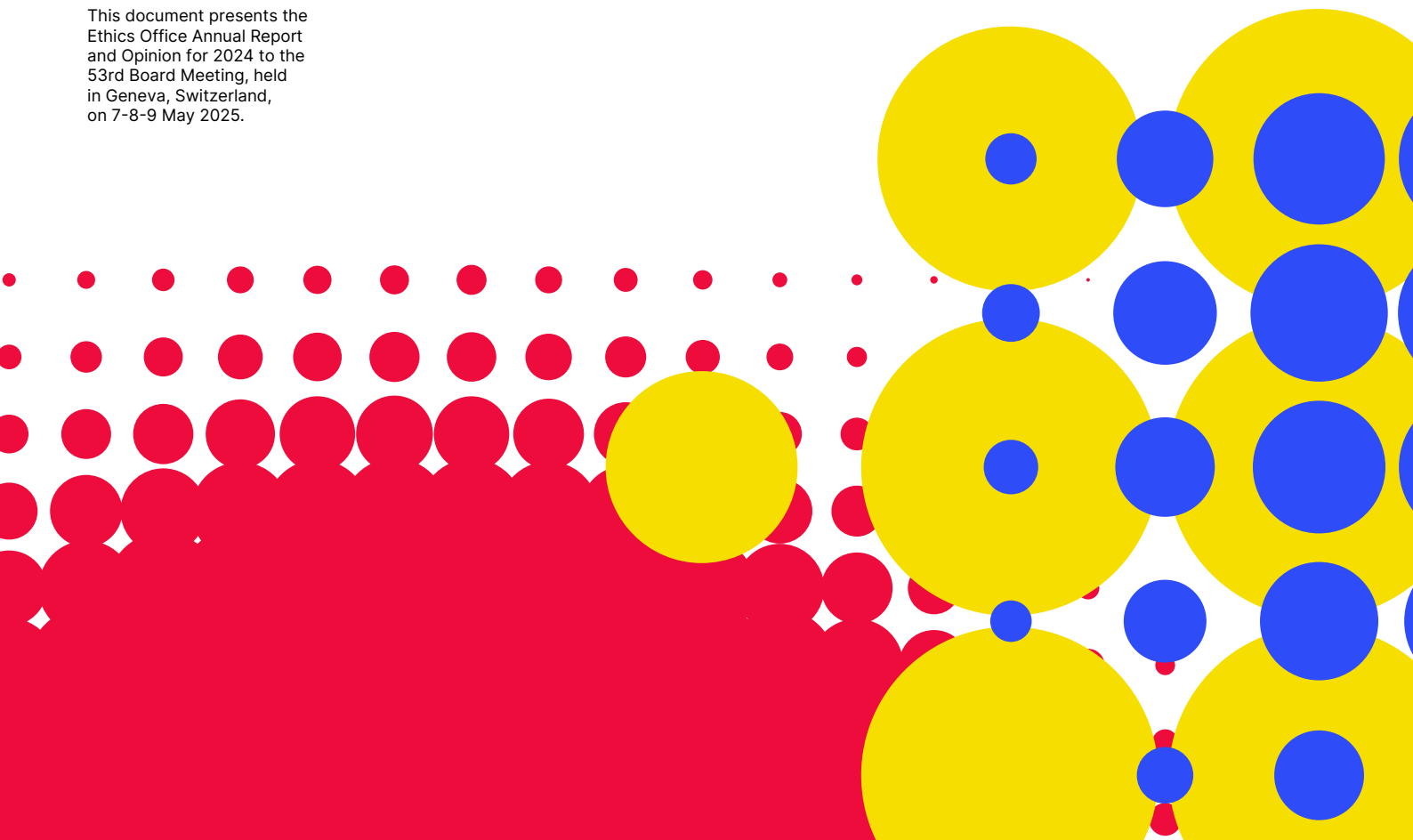
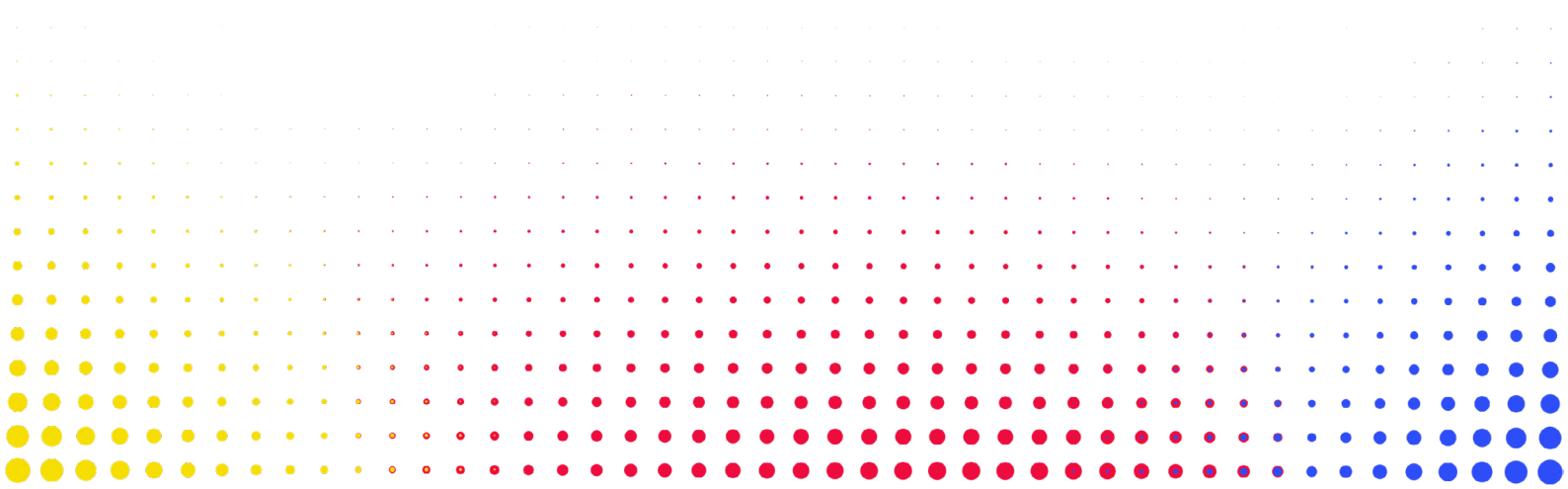


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I. Foreword

As I prepare this annual opinion and report, our ability and the ability of our partners to deliver life-saving prevention and treatment to defeat HIV, Tuberculosis (TB) and Malaria have been significantly disrupted. With a rapidly evolving and chaotic public health landscape, it is critical that we remain focused on saving lives by keeping people and communities at the center of our work.

In times of uncertainty, the risk of ethical misconduct increases, particularly risks such as fraud, corruption and abuse of power. Just as our commitment to our mission cannot waiver, in these times, we must also continue to use our ethical values – Integrity, Duty of Care, Accountability, Dignity and Respect – as guideposts in decision-making and action.

Since my arrival in March 2024, the Ethics Office has worked in close collaboration with leadership, staff, governance officials and other stakeholders to assess our ethics program and align priorities to strengthen the Global Fund culture of integrity to accelerate the Global Fund's work. Based on feedback, observations and experience, we updated the Ethics Office 2024 workplan and developed a three-year plan to mature the Ethics program with the goals of enhancing organizational resilience and safeguarding resources. Through the efforts of the Ethics team and stakeholders across our delivery landscape, we made progress in continuing to mature the Ethics program and deliver on our goals as described in more detail herein. The result is a program that matured in 2024 to further embed integrity into our strategy and risk management. For 2025, we will implement actions to continue to mature our culture and accountability .

Our organizational resilience and commitment to putting our values into action will help carry us through these turbulent times and allow us to focus on delivering on the vision of a world free of the burden of AIDS, TB and Malaria with stronger, safer and more equitable health for all.

Michelle Beistle
Chief Ethics Office



“

We must continue to use our ethical values – Integrity, Duty of Care, Accountability, Dignity and Respect – as guideposts in decision-making and action.

”

II. Annual Opinion

In line with the Terms of Reference, the Ethics Officer provides the Board with an annual opinion on “(i) the state of ethics and integrity across the entire Global Fund and the activities it finances, including anticorruption controls, based on available assessments of key risk areas; and (ii) the extent to which Global Fund activities have complied with ethics and integrity-related policies, codes and requirements.”

To develop this opinion, I relied on my experience as an Ethics professional and considered the following inputs:

- results and observations from Ethics Office activities described herein;
- interviews with members of the Management Executive Committee, head of Risk and the Inspector General;
- results of work performed by the Risk Department, Human Resource Department and Office of Inspector General, including reports provided by them to the Board; and
- results of Ethics program maturity level as set out in the Ethics & Compliance Initiative’s High-Quality Program Measurement Framework (see assessment in Annex 2).

This opinion inherently involves subjective and professional judgement as part of the analysis.

In his Annual Opinion, the Chief Risk Officer notes that current organizational risk is driven by geopolitical tensions, emerging crises, protracted conflict and a deprioritizing of health funding. As described in the Organizational Risk Register (“ORR”), the “risk of ethical misconduct among Board members and delegates, Global Fund staff and employees, implementers, suppliers, and partners involves skewed decision-making and abusive behavior that contravenes the Global Fund’s values and codes of conduct. This can lead to serious harm to individuals, reduced access to life-saving goods and services, poorly designed investments, unreliable data, financial loss, and damage to the Global Fund’s reputation and donor relationships.”

Volatility in the current risk landscape can create enabling conditions for unethical behavior, including an increased risk of fraud, corruption and abuse of power. This is particularly true in situations where the flow of treatment services and commodities is unexpectedly disrupted leading to diminished supply and impacting people’s ability to obtain life-saving treatments.

A mature Ethics program delivers activities to mitigate ethics risks. To assess the maturity of the Global Fund’s Ethics program, we used the Ethics & Compliance Initiative’s High-Quality Program Measurement Framework.¹ This methodology measures the maturity of ethics and integrity activities in an organization across five key areas: Strategy; Risk Management; Culture; Speaking Up; and Accountability. Considering common standards, maturity in these areas is rated as: Underdeveloped; Defining; Adapting; Managing; and Optimizing.

Based on my assessment reflected in [Annex 2](#) as informed by the inputs noted above and my judgment, the **Global Fund’s Ethics program remains overall at the ‘Adapting’ level of maturity, with two key areas – Strategy and Risk Management – maturing to ‘Managing’ in 2024.** Overall, the ethics program has high quality program elements, but with room to further mature in Culture, Speaking Up and Accountability. The organization’s commitment to maturing these program elements is reflected in the organization’s objectives and key results for 2025 and the Ethics Office workplan includes specific actions to support these objectives.

While strong ethics risk mitigation measures are in place and additional measures are in progress, **given the current complex and volatile operating environment, the ethics and integrity residual risk, including SEAH, remains high with a steady direction of travel.** This is consistent with the assessment reflected in the ORR.

I am not aware of any allegations of ethical breaches that the organization has failed to address in accordance with its currently approved policies and procedures. Given the efforts to refresh our Internal Justice Mechanisms and strengthen our ethical culture, including encouraging speaking up, it is likely that in 2025 more concerns may be raised. I am confident that the organization will address them fairly and consistently.

1 <https://www.ethics.org/wp-content/uploads/mdocs/2019-ECI-WP-HQP-Framework.pdf>

III. 2024 Ethics Program in Review and Looking Ahead

ENHANCING ORGANIZATIONAL RESILIENCE BY STRENGTHENING ETHICAL CULTURE

The building blocks for a strong ethical culture are setting clear expectations for ethical conduct, ensuring understanding of these expectations through learning and engagement, and holding people accountable through competent systems and resources when expectations are not met. In 2024, promoting a strong ethical culture remained a priority for the Ethics Office.

Clear Standards of Conduct

We began a comprehensive review and refresh of the Code of Conduct for Global Fund Employees to reinforce and clarify our organizational values, set clear expectations for staff behavior to translate these values into action, and enhance the Code's relevance, practicality and accessibility. The Ethics Office is collaborating closely with key stakeholders and actively engaging with the entire Secretariat on this effort.

The refreshed employee Code will be implemented in 2025 along with new tools and technical guidance to help staff meet the expectations. The implementation plan includes a review and refresh, as needed, of other E&I policies and procedures for alignment. More holistically, we will establish a routine review plan so that our Codes and E&I policies and procedures are regularly reviewed and refreshed as needed.

Learning for Understanding

The Ethics Office provides training, directly or in partnership with others, to a variety of stakeholders on ethical conduct and mitigating key E&I risks. Below is a snapshot of the individuals reached through our 2024 efforts.

The Office of Inspector General continued to lead on training to combat fraud and corruption in programmatic activities. The OIG 2024 annual report details their efforts. In 2024, the Ethics Office began a closer collaboration with OIG on learning and engagement with stakeholders. We will continue to build this collaboration in 2025.

In 2025, we will also continue to provide learning opportunities to staff, implementers, CCMs, and governance officials. Our planned activities include: a mandatory online all-staff ethics training to promote understanding of the refreshed Code and emphasize how our values apply in daily operations to mitigate key E&I risks; live training in PSEAH institutional capacity strengthening for implementers in 6 high priority countries and through one regional workshop; and through live and online training for CCMs, governance officials and staff. We will also develop additional online modules for PSEAH capacity building to reach a broader audience of in-country partners.

In 2024, promoting a strong ethical culture remained a priority for the Ethics Office.

LIVE**Ethics****218**

secretariat staff over 9 sessions

39

governance officials over 2 sessions

455

CCM members over 15 sessions

ON-DEMAND ONLINE**Ethics****810**

CCM members completed the CCM e-learning on Code of Conduct, representing 18% of all CCM members and their alternates

PSEAH**315**

staff from 15 PRs, 72 SRs, and 4 CCMs from 4 highest priority countries trained in PSEAH institutional capacity strengthening

120

PSEAH Focal Points (PR, SR, CCM) from 21 countries in the Asia-Pacific region trained in PSEAH best practices

358

PR, SR, and SSR staff, including peer educators, outreach workers and community health workers, from Cote d'Ivoire, Nigeria, Uganda, and Zimbabwe trained in Safer Programming to identify and mitigate SEAH risk at programmatic and service-delivery level

PSEAH**246**

staff on PSEAH module

125

staff on Awareness Training for Sexual Harassment module

121

staff on Dignity and Respect at Work module

Integrity Due Diligence (IDD) training sessions**~30**

internal auditors at the OIG conference

~200

implementers

~100

secretariat staff members

~60

constituency representatives to support the 2025-2028 Committee nomination process

Accountability

Having a consistent and fair process for holding individuals accountable when they violate our policies, Codes or procedures is essential to a strong ethical culture. The Human Resources Department leads the oversight and investigation of allegations of staff misconduct.

As part of our efforts to promote a speak up culture, in 2024, the Ethics Office with the Chief Human Resources Officer, Chief of Staff and General Counsel began a review of the internal justice mechanism within the Global Fund to assess whether it is fit for purpose for our evolving workplace. The assessment considers structure, process and implementation, including the use of technology to support confidential and anonymous reporting, smarter workflows and data analysis to enable a more proactive approach to addressing root causes.

In 2025, we will continue this effort and begin implementing identified enhancements to strengthen our IJM. This effort will also include clarifying protection from retaliation for individuals that raise concerns in good faith.

MITIGATING KEY ETHICS RISKS TO SAFEGUARD RESOURCES DEDICATED TO HEALTH

Avoiding and Managing Conflicts of Interest (COI)

Transparency is critical to safeguarding organizational resources, promoting ethical governance, and reinforcing a culture of transparency and accountability. The Ethics Office continued to manage the disclosure of interest (DOI) program and provide strategic guidance on conflict-of-interest mitigation and management. As part of the program, we supported the integrity of Global Fund decision-making by facilitating DOI campaigns, conducting COI assessments, recommending risk mitigation measures and providing tailored support to the Board, Committees, the Technical Review Panel (TRP), the Independent Evaluation Panel (IEP) and the Grant Approvals Committee (GAC).

Through these efforts, we collected and assessed 301 DOI forms from Governance Officials with participation from 99% of Governance Officials. This included assessments in preparation for each Board and Committee meeting, the 2025-2028 Committee leadership and membership nomination process, as well as the selection of both the interim and the new IEP Chair. We also received and managed ad hoc disclosures from staff. In total, we identified and assessed 83 situations that presented an actual, potential or perceived conflict of interest for staff and Governance Officials. In each case we recommended mitigation measures and provided guidance.

In addition, we actively raised collective awareness on COI risks at the start of Board and Committee meetings and emphasized the importance of transparency to building trust in onboarding for new Governance Officials and staff.

In 2025, the Ethics Office will strengthen its proactive approach to managing COI by implementing procedural enhancements, leveraging technology, and focusing on a targeted awareness initiative for staff and Governance Officials.

Protection From Sexual Exploitation, Abuse, And Harassment (PSEAH)

The Global Fund's goal of eliminating the three diseases depends on the delivery of people-centered services that are freely available to all, without fear or favor, and on maintaining safe and thriving workplaces across our extended partnership. While the Global Fund cannot remove the risk of such abuses, it can, together with partners, mitigate the risk of SEAH and respond appropriately when SEAH is discovered.

In 2024, the Global Fund continued its efforts to implement a robust program to protect beneficiaries and other stakeholders from sexual misconduct and abuse of power. We led workshops in PSEAH Capacity Building and Safer Programming for SEAH risk mitigation at programmatic and service delivery-level in Nigeria, Cote d'Ivoire, Uganda, and Zimbabwe, and one Regional PSEAH Capacity Building regional workshop in Malaysia with participants from 21 countries from the Asia-Pacific region. In total, the Ethics Office engaged 793 attendees from sector partners, PRs, SRs, and CCMs, including peer educators, outreach workers, and community health workers, combining learning with risk mitigation and practical action planning.

To complement this work, we continued our PR-wide PSEAH capacity assessment and capacity-building support for 66 PRs from 26 countries. As part of our support in this area, we built and populated an online PSEAH resource library with guidance materials and templates structured across the nine standards of our PSEAH capacity assessment.²

The Ethics Office supported CCM Ethics Officers from three countries – Ghana, Kenya, and the Philippines – to pilot a locally-owned communication campaign about SEAH risk to beneficiaries. The campaign focused on providing beneficiaries with knowledge about what SEAH is, how to report it, and what they should expect from the Global Fund partnership.

In 2024, the Global Fund continued its multi-disciplinary team approach to SEAH response by collaborating with the OIG and key stakeholders across the Secretariat and in-country for a trauma-informed, victim/survivor-centered response. Case managers from the Ethics Office provided technical support and assistance to local partners for investigations and victim/survivor support. As reflected in [Annex 3](#), these efforts contributed to closure of the final open agreed management action for the Ethics Office.

The Ethics Office opened 39 new SEAH cases in 2024, an increase of 34.5% from last year's total of 29 new cases. We believe this uptick reflects increased awareness and trust in reporting to the Global Fund because of proactive efforts by us, our stakeholders and our partners. Across these 39 SEAH cases, we identified and supported 22 victim/survivors.



Our work in 2025 will focus on completing our technical assistance for capacity-building in our highest priority SEAH countries, and engaging implementers and CCMs regionally in francophone Africa. We will also focus on implementing steps to further embed the PSEAH program into operations, including through support for capacity building across all PRs and integrating SEAH risk mitigation into the grant making process.

Working through the CCMs and the PSEAH Focal Points at PRs and SRs, the Ethics Office will continue to support a locally owned, culturally relevant approach to PSEAH. This will include PSEAH communications campaigns using the learnings from the pilots in 2024. In addition, we will continue to build online learning and engagement resources to provide in-country partners with on-demand resources when they need them.

Promoting Integrity in Our Operations and Funded Programs

In addition to the activities detailed above, the Ethics Office promotes operational integrity and ethical conduct of third-parties with whom we partner and engage through several targeted initiatives.

INTEGRITY DUE DILIGENCE (IDD): we oversee the implementation of the IDD Framework to identify and manage counterparty integrity risk in our operations. The Ethics Office maintains a tool that uses proprietary data from Global Fund assurance functions and publicly available data to evaluate the extent to which a counterparty might expose the Global Fund to

² PSEAH resources and tools, available at <https://www.theglobalfund.org/en/pseah/additional-resources/>

integrity risk. In 2024, we conducted essential IDD for 2714 individuals and 794 organizations. We conducted enhanced IDD to support several procurements, including for service agents responsible for managing over \$1bn in annual procurement, as well as for molecular technologies and rapid diagnostic kits suppliers. We also conducted essential IDD for 184 candidates for governance roles. The findings from these assessments were used by the organization to implement mitigation measures to prevent reputational risk to the organization where appropriate.

To further embed IDD into programmatic operations, we implemented guidelines for implementers to conduct IDD in their operations and provided training to country teams, implementers and internal auditors. We also matured our IDD guidance for Board constituencies and provided training to constituency representatives to conduct IDD for governance official nominations to Board committees.

In 2025, the Ethics Office will continue work with the Grant Management Division and Risk Team to embed integrity considerations, including PSEAH, into the Global Fund Capacity Assessment Tool and Integrated Risk Management tool to help manage integrity risks of PRs. We will also work with stakeholders across the Secretariat to consider improvements in our IDD program for efficiency and effectiveness.

FRAUD AND CORRUPTION: we partner with stakeholders across the Secretariat and OIG to combat fraud and corruption. In 2024, the Ethics Office completed implementation of initiatives designed to embed preventative fraud risk mitigation measures into grant design through a focus on performance and results. Working with stakeholders across the Secretariat, we also supported implementation of key recommendations from the Fraud Risk Maturity Assessment. **In 2025**, the Ethics Office will continue to partner with stakeholders to manage fraud risk and provide technical support and guidance.

COUNTRY COORDINATING MECHANISMS (CCM): the Ethics Office supports programs to strengthen operations of CCM with a focus on ethical and responsible conduct, decision-making and conflict of interest management. CCMs play an important role in our country-led approach, including creating funding requests, nominating principal recipients, and overseeing grant implementation.

In 2024, the Ethics Office, in close collaboration with the GMD CCM Hub and Country Teams, provided

technical advice and support to CCM ethics functions, secretariats, and leadership to foster their ethical cultures and integrity driven decision-making. We also continued to fund and support a cohort of 15 CCM ethics officers. We created virtual networking events for these CCM ethics officers to share their experiences and exchange ideas, lessons learned, best practices and challenges.

At the end of 2024, with GMD, we assessed the effectiveness of the CCM ethics officer role and the return on investment as we consider how best to support ethics capacity-building and strengthening at all 110 CCMs. **In 2025**, we are developing a plan with the CCM Hub to use the learnings to implement more strategic efforts in the CCMs to promote integrity and mitigate ethics risks with a focus on sustainability. This will include efforts to strengthen CCM Ethics committees and focal points with technical advice and guidance.

MATURING ETHICS PROGRAM

A hallmark of a strong ethics program is continuous assessment, measurement and enhancement to meet the evolving needs of the organization to deliver on its mission. Over the first six months of my tenure as the Ethics Officer, I spent time building relationships, listening and assessing the ethics program and team structure to develop a three-year strategic plan to mature the ethics program to support the delivery of our mission to defeat HIV, TB and malaria.

In late 2024, the plan was approved and included the actions for 2025 described throughout this report. In addition, the plan includes maturing the ethics program by:

- Increasing use of relevant ethics risk and mitigation data and analytics to provide annual assurance opinion on the extent to which Global Fund activities have complied with ethics and integrity-related policies, codes and requirements;
- Establishing programmatic key performance indicators to facilitate assessment of impact and effectiveness of ethics program efforts; and
- Establishing regular ethical culture assessments to identify opportunities for strengthening.

Annex 1

Overview of the Ethics Office

The Ethics Office is comprised of a diverse team of professionals designing, developing and implementing standards, tools and guidance to foster an ethical and integrity-driven culture that safeguards resources dedicated to save lives, inspires stakeholder trust and strengthens organizational resilience to deliver on our mission.

To varying degrees we engage with these **stakeholders...**

Operations

- Implementers: Principal Recipients (PRs) & Sub-recipients (SRs)
- Country Coordinating Mechanisms (CCMs)
- Direct suppliers
- Assurance providers, including Local Fund Agents (LFAs)

Secretariat

- Senior management, staff, consultants
- Private sector partners
- Indirect suppliers

OIG

- Senior management, staff, consultants
- Professional Services, Investigations and Audit units

Governance

- Board & Committees
- Technical Review Panel (TRP) & Independent Evaluation Panel (IEP)

...on these **topics** to mitigate these **risks...**

Strengthening ethical culture

- Clear standards of conduct
- Learning for understanding
- Consistent accountability

Managing E&I risks

- Conflict of interest (COI)
- Fraud and corruption
- Sexual exploitation, abuse and harassment (SEAH)
- Abuse of power
- Misconduct, including violation of codes, policies and procedures
- Harassment and bullying
- Discrimination
- Retaliation

...conducting the following **program activities.**

- Fostering an ethical tone from the top and throughout the organization
- Developing and maintaining E&I policies, codes of conduct and procedures
- Providing tools/technical advice to mitigate E&I risks
- Managing conflicts of interest
- Conducting essential and enhanced third-party due diligence
- Developing and delivering training, learning and engagement activities
- Performing & supporting E&I risk assessment
- Responding to ethical misconduct and supporting investigations
- Supporting consistent accountability and protection from retaliation
- Reporting and providing annual assurance to the Executive Director and the Board

Staffing, Budget and Systems

In 2024, the Ethics Office was comprised of a diverse team of 19 professionals mostly organized to focus on mitigating specific ethics and integrity risks.

In March 2024, the new Ethics Officer of the Global Fund arrived, ending over two years of leadership transition. In the first six months, the Ethics Officer spent time building relationships, listening and assessing the ethics program and team structure to develop a three-year strategic plan.

In late 2024, the new Ethics Officer presented a three-year plan to mature the ethics program and consistently deliver to meet the needs of the organization. This plan included transforming the Ethics Office structure to become more agile in order to be a strategic and proactive partner to the business.

The new structure was approved and includes three delivery pillars that are being implemented in 2025:

- 1 **Ethics Risk Prevention & Protection from Sexual Exploitation, Abuse and Harassment**
- 2 **Ethics Risk Management, Monitoring & Governance**
- 3 **Ethics Response & Investigations**

The Global Fund continues to allocate appropriate resources to the ethics function to deliver on the Ethics program responsibilities and priorities.



While we worked diligently to manage our budget, the nature of our activities requires us to budget some funds for events that are not certain. For example, in the Other Ethics bucket, we budgeted to provide training as part of the IJM refresh project for our HR and Ethics staff to assist staff with conflict resolution. This training was postponed to 2025 to align with other project outcomes. Similarly, in the PSEAH bucket, we did not need funds we earmarked for victim/survivor support. We also postponed licensing of a new case management system to 2025 to share in the synergies with the IJM refresh project. Additionally, due to unforeseen circumstances, we had to postpone one of our planned in-country missions.



Year	Operating Expenses (USD)	
2024	Budget	Actuals
Overall Ethics Office budget	4,404,523	3,992,121
<i>of which:</i>		
<i>budget dedicated to Other Ethics</i>	<i>2,037,541</i>	<i>1,968,481</i>
<i>budget dedicated to PSEAH</i>	<i>2,366,982</i>	<i>2,023,640</i>

Annex 2

Ethics Program Maturity





Global Fund Maturity According to the Ethics & Compliance Initiative's (ECI) five level High Quality Program Measurement Framework:



ECI PRINCIPLE	UNDER-DEVELOPED	DEFINING	ADAPTING	MANAGING	OPTIMIZING	RATING EXPLANATION
Principle 1 Strategy Ethics & compliance is central to strategy				 		'Managing' <i>Ethics is embedded with program controls and procedures operating as an integral part of business processes.</i> <ul style="list-style-type: none"> • Ethical values are clearly expressed in the Global Fund's strategy, and the E&I program is aligned to enable this strategy. • The Ethics Office is allocated appropriate financial resources to deliver on the program. • Leadership consistently demonstrates a strong organizational commitment towards E&I. • The Ethics Officer reports to the Board (through the Ethics and Governance Committee (EGC) and to the Executive Director for access and independence, in line with best practices observed in peer organizations. • The E&I program is integrated into core organizational processes and activities, namely the Global Fund Business Process Model, organizational priorities setting and the integrated risk management tool. • The organization has objectives and key results related to ethics, including PSEAH which cascade down through the Executive Director and Management Executive Committee (MEC) to all parts of the organization. • The Ethics Officer is a member of the MEC and participates in key strategic discussions, including at the EGC and Board meetings. They also chair the Secretariat's Private Sector Engagement Committee. • The Board, through the EGC, is knowledgeable about the E&I program and monitors its implementation periodically, notably through regular reporting and updates from the Ethics Officer and the Ethics Office Annual Report and Opinion. • The organization shares its learning on E&I to positively influence responsible practices internally and in other organizations.

 2023 Ratings  2024 Ratings

ECI PRINCIPLE	UNDER-DEVELOPED	DEFINING	ADAPTING	MANAGING	OPTIMIZING	RATING EXPLANATION
Principle 2 Risk Management Ethics risks are identified, owned, managed and mitigated			●	●		'Managing' <i>A formal risk assessment process is developed and embedded as an integral part of business processes.</i> <ul style="list-style-type: none"> ● Risk assessments are carried out by a dedicated Risk Department staffed with experienced risk professionals and supported by leadership. ● Risk indicators and results for E&I risks are determined and shared across the organization as part of the Organizational Risk Register and the Integrated Risk Management tool for grant operations. ● The Ethics Officer is a member of the cross functional Steering Committee for fraud risk assessment and management. ● Key risk areas are discussed with and receive input from leadership and the Board. ● The Global Fund consistently conducts third-party integrity due diligence (IDD) at the level of the Secretariat and for purposes of in-country operations. Technical advice and tools are implemented for PR-led IDD. ● Disclosures of interest are consistently collected and managed for Governance and enhancements are planned to strengthen this for the Secretariat in 2025. ● E&I training is tailored to stakeholder groups based on their role and risk exposure.
Principle 3 Culture Leaders at all levels build and sustain a culture of integrity			●	●		'Adapting' <i>Leaders are embedding E&I program elements with accountability assigned for key E&I risks, but there is room to improve clarity and understanding of staff code of conduct and consistency in addressing concerns.</i> <ul style="list-style-type: none"> ● Leaders at all levels promote ethical conduct and many recognize their role in modeling and nurturing an ethical culture but may handle misconduct and address concerns inconsistently. ● Mission-driven decision-making is emphasized at senior levels, with leaders committed to doing the right thing and aligning decisions with organizational values. ● Targeted ethics training courses are conducted based on risk exposure, including through interactive onboarding sessions for staff and governance officials but there is no training plan for consistent training and no requirement for regular mandatory refreshers. ● Codes of conduct exist and are routinely certified to by relevant stakeholders at the Global Fund, but there is no plan to review and refresh the Codes and the staff Code is unclear on key E&I requirements which may lead to misunderstanding.


● 2023 Ratings ● 2024 Ratings

ECI PRINCIPLE	UNDER-DEVELOPED	DEFINING	ADAPTING	MANAGING	OPTIMIZING	RATING EXPLANATION
Principle 4 Speaking Up The organization encourages, protects and values the reporting of concerns and suspected wrongdoing			 			'Adapting' <i>A formal employee speaking-up/ reporting structure is partially embedded, but more progress is needed.</i> <ul style="list-style-type: none"> • The culture and environment, including the Global Fund's various codes of conduct, proactively promote a speak-up culture and encourage employees, governance officials, beneficiaries, and contractors to raise concerns through various channels. • A formal policy and process exist to raise and resolve concerns or suspected wrongdoing with communication around the speak-up program. • The OIG offers anonymous reporting options, but the intake process for allegations of staff misconduct through HR does not. • The internal justice mechanism is designed so that employees who raise concerns are treated fairly and consistently across the organization, but employees lack trust in the system. • A prohibition against retaliation exists as part of the Global Fund's Whistleblowing Policy and Procedures, the PCFC, and the codes of conduct for employees, governance officials and members of CCMs, but the various statements do not use consistent terms leading to confusion in their application.
Principle 5 Accountability The organization takes action and holds itself accountable when wrongdoing occurs			 			'Adapting' <i>The organization communicates applicable standards and outcomes to employees and has established escalation, tracking, and investigative protocols, including measures for consistency of consequences and basic root cause analysis.</i> <ul style="list-style-type: none"> • A policy on reporting misconduct exists, is known, and is generally enforced; codes of conduct provide for employees, governance officials, members of CCMs being held accountable for reporting and/or misconduct. • The Global Fund is committed to transparency and accountability to show stakeholders it is making effective use of the funds with which it is entrusted. • The OIG normally publishes the outcome of its audit and investigations, including trend analysis, root cause and consistent consequences, but HR does not routinely share general information about staff misconduct cases, trend analysis or root causes. • Structures and measures to promote consistent discipline exist. • Secure case management systems for handling allegations of misconduct or prohibited practices exist. • Scenarios inspired from real-life cases are used for training (SEAH, Conflicts of Interest). • Investigations are conducted/overseen by trained investigative staff.

 2023 Ratings  2024 Ratings

Annex 3

Agreed Management Action Update

	AGREED ACTION	STATUS UPDATE
PSEAH AMA1 	<p>The Global Fund Secretariat will advance the implementation of the organization's Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power (the "PSEAH Operational Framework") from development and trial commencement (Phase I – 2022-2023) to implementation and scaling (Phase II – 2024-2025) by:</p> <ol style="list-style-type: none"> Agreeing metrics to annually measure the implementation of the PSEAH Operational Framework (to be completed by 30 June 2023) Ensuring a risk-based and impact-driven approach determines Phase II selection of countries and Principal Recipients (to be completed by 30 June 2023); PSEAH capacity assessments and grant-level risk mitigation activities underway according to schedule. Using lessons learned from the 2023 grant-level SEAH risk mitigation pilots to refine the grant-level risk mitigation approach (to be completed by 31 December 2023) Defining an approach and developing an action plan to strengthen local SEAH reporting channels consistent with internationally recognized standards and leveraging community level engagement Communicating, by 30 June 2023, to all CCMs and PRs to reiterate a) the need for implementers to have strong reporting channels and quickly and effectively respond to allegations of wrongdoing; and b) their obligation to promptly report such allegations to the Global Fund Secretariat or OIG 	<div>AMA CLOSED AS COMPLETED</div> <p>October 2024</p>



**The Global Fund to Fight
AIDS, Tuberculosis and Malaria**

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