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# 2018 Workplan and Budget of the Independent Integrity Unit

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## **Summary**

This document contains a draft workplan and budget for the Independent Integrity Unit for Budget Year 2018. The workplan outlines the areas of work for the Unit in 2018. The budget reflects an estimate of the cost implications of implementing the workplan.

This workplan reviews the activities of the Unit in 2017 and the degree of achievement of milestones in the current year. It also builds on the achievements for 2017 and sets out new targets for 2018 as part of a three-year development plan for the establishment of an efficient and effective IIU.

The major priorities for 2018 are the advancement of the staffing plan to cover all the work areas of the IIU, operationalisation of approved integrity policies, implementation of a plan of proactive engagement with external entities and partners, development of comprehensive guidance for integrity matters, as well as scaling up of investigative capacity.

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## I. Introduction

1. The Independent Integrity Unit (IIU) has implemented the 2017 workplan and budget approved by the Board at its 15<sup>th</sup> Meeting. IIU worked closely with the Ethics and Audit Committee of the Board in drafting and reviewing key integrity policy documents, with a particular focus on the Anti-Money Laundering and Countering the Financing of Terrorism Policy, Whistleblower and Witness Protection Policy, Prohibited Practices Policy, and the Investigation Standard. Regarding staffing, the immediate requirement for the start-up period has been fulfilled. IIU actively cooperated with the operations divisions of the Secretariat in developing policies and also raising awareness of external stakeholders such as countries and accredited entities on the GCF's integrity standards. More detailed summary of key activities of the Unit is set out in Annex I.

## II. Review of 2017 Workplan and achievements

2. The IIU workplan for 2017 elaborated a start-up plan for the establishment of the Unit. The essential focus for 2017 was along the three main workstreams of prevention, investigation and enlightenment.

3. In fulfilment of its reporting obligations to the Ethics and Audit Committee (EAC) of the Board, IIU presents quarterly reports to the EAC. These reports summarize the activities of the IIU for the relative periods and provide a basis of measurement against the projections in the 2017 workplan. The quarterly reports for the first and second quarters of 2017 have been endorsed by the EAC and are attached herewith for information.

4. In summary, the main achievements of IIU in executing the 2017 workplan are as follows:

(a) Developing an integrity policy framework

Significant work was undertaken to address the important task of developing critical policy documents for the Fund's operations. The IIU has developed four policy documents, *viz* AML/CFT Policy (in collaboration with ORMC), Whistleblower and Witness Protection Policy, Prohibited Practices Policy and Integrity Due Diligence Policy for Private Sector Operations. These policy drafts have been presented to the Ethics and Audit Committee (EAC) and have been scheduled for the Committee's review.

(b) Initial staffing of IIU

Two staff positions approved by the Board in the 2017 Workplan and Budget were advertised and recruited. The Operations Analyst took up the post in July 2017, and contract negotiation was ongoing as at the end of August with the candidate selected for the IT Forensics Investigator post. Two policy development consultants and an intern were also hired to support in the short-term.

(c) Investigations-related

(i) IIU took over three complaints, previously led by an Internal Audit consultant prior to the establishing of the IIU. IIU completed one full investigation during the period, while one complaint was put in "suspense" for lack of information. One investigation is ongoing (to be completed end October 2017) while two other complaints were determined to be outside the mandate of IIU for lack of subject-matter jurisdiction.

- (ii) Drafting of the Investigation Standards has been finalized and will be presented to EAC for endorsement after the 18th meeting of the Board, following review by the Office of the General Counsel and an external peer review. This is an important document setting out investigation standards and procedures to ensure investigations are conducted in an ethical and professional manner.
- (d) **Conflicts of Interest**

IIU established a “Conflicts of Interest (CoI) Register” and in consultation with the EAC, issued advisories on five CoI declarations during this period. The advisories related to self-reported cases where individuals covered under the different CoI policies reported actual or potential conflicts.
- (e) **Building an operational working relationship with the Secretariat**

IIU worked closely with ORMC on matters related to the development and operationalization of the AML/CFT policy. IIU reviewed, provided advice and engaged in negotiations on provisions regarding Accreditation Master Agreements (AMAs) and Readiness Grant Agreements. IIU also actively participated in the Direct Access Workshop and Structured Dialogues organized by CPD. During these events, IIU had bilateral meetings with representatives of countries and Accredited Entities to raise awareness and provide advisory function in establishing their integrity policies.
- (f) **Embedding with professional networks**

In fulfilment of the mandate in Article 15 of its TOR, to collaborate with counterpart offices in international financial institutions (IFIs) and multilateral development banks (MDBs), IIU initiated contacts with the counterpart offices with a view to exchanging information and professional experience for peer learning. As a result, IIU has been admitted to membership of two foremost networks – the Conference of International Investigators (CII), and United Nations Representatives of Investigative Services (UN-RIS).

### III. Work plan of IIU for 2018

5. The IIU workplan for 2018 follows on from the 2017 workplan, as well as a three-year plan to fully establish the Unit to meet its mandate. As stated in the summary above, the major priorities for 2018 are as follows:

- (a) The advancement of the staffing plan to cover all the work areas of the IIU;
- (b) Operationalisation of approved integrity policies;
- (c) Development of comprehensive guidance for integrity matters;
- (d) Implementation of a plan of proactive engagement with external entities and partners; and
- (e) Scaling up of investigative capacity.

#### 3.1 Staffing Plan

6. **2017 recruitments:** Two staff positions were approved by the Board in the IIU 2017 Workplan as an initial start-up. In order to realise its workplan objectives for the year, IIU supplemented this by hiring two policy development consultants and one intern. The

Operations Analyst took up the post in July 2017, while as at end of August 2017 negotiations were ongoing with the candidate selected for the IT Forensics Investigator position.

7. **New staff positions:** For the next phase of its staffing plan, IIU would need to recruit four more staff positions in 2018. These positions are in the investigator role (IS4 Investigations Specialist and IS1 Investigations/IT Assistant), for the compliance function (IS4 Compliance Officer), and in the analyst role (IS1 Data Analyst). These positions are required to meet the increased workload in 2018 as described in this workplan. There would be a further review based on projected increases in the workload in 2019.

8. **Justifications:** The following factors impact the determination of what an optimal number of fraud investigators would be for the GCF: (i) growth in funding portfolio (2018 projections of 40-55 funding proposals with an indicative value in the range of \$2.2billion - \$2.8billion, and estimated cumulative disbursements of up to \$837million)<sup>1</sup>; (ii) indirect financing model, which creates challenges for oversight of integrity violations; (iii) direct implementation of the Readiness Programme and Project Preparation Facility potentially in about 140 countries; and (iv) current staff size of about 150 employees.<sup>2</sup> Based on these considerations, it is estimated that an optimal number of fraud investigators in the GCF in the immediate term is six.

9. **Work allocation:** For the purpose of this workplan, the two positions currently approved and filled, as well as the four new positions requested are deemed to fall into the generic category of fraud investigators. Studies show that 37% of fraud investigation teams spend three-quarters of their time solely on fraud investigations.<sup>3</sup> This percentage fits the projection in this workplan as IIU would have three full-time investigator positions, which is about one-third of its workforce. Should there be a need in the future to increase this number or allocation based on an increased workload, a request will be made to the Board for approval of additional IIU staff positions.

## 3.2 Operationalization of approved policies

10. **Policies:** The following four policy documents have been developed in the first year of the Unit's inception: Anti-Money Laundering and Countering the Financing of Terrorism Policy, Whistleblower and Witness Protection Policy, Prohibited Practices Policy and Integrity Due Diligence Policy for Private Sector Operations. IIU will develop or support the development of additional policies and standards documents in collaboration with the Secretariat, including the Sanctions Policy and Administrative Guidelines for Conflict of Interest.

11. **Methodologies for operationalization:** Detailed implementation procedures and standards have been presented to the EAC for the AML/CFT and Prohibited Practices policies, and will also be presented for the other two policies. In addition, guidelines are being developed for the implementation of the financial disclosure, and also for conflict of interest policies. These procedures and guidelines set out the response and reporting mechanisms that cover the subject-matters of the policies. IIU roles and functions in these mechanisms have been identified and internal process-flows will be elaborated for the guidance of IIU staff dealing in these subject areas.

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<sup>1</sup> 2018 Work Plan of the Secretariat to be presented to the Board at B.18

<sup>2</sup> Survey results show that organizations with less than 100 employees typically have an average of six investigators, while those with between 100-999 employees have on average ten investigators in their in-house teams [*In-House Fraud Examination Teams: 2017 Benchmarking Report*], published by the Association of Certified Fraud Examiners]

<sup>3</sup> *Op cit*

12. **Building IIU capacity:** In order to effectively implement the policies, and to execute its responsibilities under them, IIU would need to increase its capacity in investigations, AML/CFT compliance and proactive interventions. This need will be addressed by appropriate staffing (as highlighted above), proactive engagement with the Secretariat, networking and operational exchanges with communities of practice, and collaboration with GCF's external entities.
13. **Reporting to the Board and Secretariat:** IIU has reporting obligations to the Board (through the Ethics and Audit Committee) on the implementation of the policies, and also where specified, to the GCF Executive Director for administrative purposes and for reporting the outcomes of internal investigations. IIU has identified what these reporting obligations are and specific responsibilities have been assigned to IIU staff for this purpose.

### 3.3 Guidance for integrity matters

14. **AML/CFT reporting and response:** The AML/CFT implementation procedures and standards elaborate the processes required for implementation of KYC assessments, responses, evaluation and reporting. The procedures are supported by a graphic process-flow which represents the actions and responsibilities mandated under the policy. IIU is responsible to the Board for the implementation of the policy and will build its capacity to do so effectively by recruiting a specialised Compliance Officer. Through the Compliance Officer, IIU will engage effectively with the Secretariat to operationalise the AML/CFT Policy and ensure accurate reporting to the Board.
15. **Instructional material:** IIU will also work with the Secretariat to further develop instructional material to all staff and actors required to perform a function under the policy, including from the accreditation process, to operations activities in project funding, through to the investigative response that IIU will perform in the event of a violation.
16. **Prohibited Practices Policy:** The policy contains information on the process for reporting integrity violations, and the mandatory obligation of staff and accredited entities to report any suspected violations to IIU. The investigation standard document sets out comprehensive guidance for the conduct of the investigation function with respect to violations that are reported or otherwise detected. IIU has produced documentation in the form of pamphlets and *Frequently Asked Questions* (FAQs) which have been made available to GCF external entities at the CPD Structured Dialogues, but which are currently being modified in line with instructions from the EAC. These materials will be placed on the Unit's website for wider circulation.
17. **Conflict of interest policies:** The various conflict of interest policies approved by the Board require IIU to develop guidelines and procedures for the implementation of the policies on conflict of interest. This task is currently being done and a draft of the guidance document will be presented to the EAC for its review and endorsement.

### 3.4 Implementation of a proactive plan for engagement

#### 3.4.1 Proactive oversight of GCF projects and other funded activities

18. **Proactive Project Reviews (PPR):** With its increased staffing, IIU will develop and implement in collaboration with the Secretariat, a holistic oversight strategy for GCF-funded projects by conducting proactive reviews of ongoing projects focused on ensuring compliance

with the Fund's integrity policies. These reviews will be based on existing PPR models<sup>4</sup>, and will be founded on three main elements:

- (a) Procurement reviews, to ensure that all procurement processes under the project are undertaken according to GCF rules;
- (b) In collaboration with the Secretariat to undertake assessments of project implementation; and
- (c) "Books-and-records" inspections, to ensure that financial disbursements match project outputs and milestones.

19. Data Mining and Predictive Analysis: IIU will proactively identify potential integrity risks in CPD operations related to the Readiness and Preparatory Support Programme/PPF, and institute mitigating controls. The methodology to be applied will be based on statistical modelling generated by an exploitation of project data across the CPD portfolio. The expectation is that such modelling would enable fairly accurate prediction of integrity weaknesses which would then enable IIU to focus its preventative interventions.

### 3.4.2 Integrity Risk Assessments

20. IIU will continue to engage the offices of the Secretariat as well as external stakeholders to develop and assess the landscape of key integrity risks facing the Fund and external stakeholders, mitigating controls, relevant action plans and procedures that currently exist in order to assess integrity risks. The results of this work will be reflected in management action plans, including ongoing monitoring and integrity awareness-raising activities.

### 3.4.3 Raising Awareness of Integrity

21. IIU will continue to promote and enhance awareness of GCF integrity standards by conducting the following activities:

- (a) Training Secretariat staff on integrity standards and ethics: IIU in collaboration with the Secretariat will develop training programmes for the Fund's staff, consultants and other stakeholders. In addition to onsite training, online tools and instructional material embedded on the IIU webpage will be employed for this purpose.
- (b) Participation in CPD Regional Structured Dialogues: In order to maximise synergies and economies of scale, IIU will continue to attend the Regional Structured Dialogues and other events organized by the Country Programming Division (CPD) to engage with countries and entities, to promote awareness of GCF integrity standards to key external stakeholders, including particularly civil society entities and networks.
- (c) Integrity Summits: IIU proposes, in collaboration with the integrity offices of comparator institutions (and with regional stakeholders), to organise periodic "*GCF Summits on Integrity in Climate Financing*". These would be high-level conferences that bring together all stakeholders to achieve a consensus on transparent and accountable utilization of GCF and other climate change financing, and to establish a platform to

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<sup>4</sup> The Office of Audit and Investigations (OAI) of the Asian Development Bank (ADB) pioneered this model. IIU will engage with OAI to adapt and further perfect its capacity to implement PPR.

aggregate multi-disciplinary capacities for collaboration in preventing and detecting fraud and misuse of climate funds provided by the GCF.<sup>5</sup>

- (d) **Integrity Management Committee:** IIU proposes to engage with the Secretariat to establish an Integrity Management Committee (IMC). The proposed IMC will consist of directors and/or appointed focal points from each division to discuss and manage integrity issues which could arise in the course of GCF operations. This Committee will be a platform to:
- (i) Facilitate communications between IIU and the Secretariat on integrity issues;
  - (ii) Achieve common understanding between the Secretariat and IIU on integrity issues;
  - (iii) Raise the profile and awareness of the integrity policies in each operational and support divisions; and
  - (iv) Channel IIU integrity initiatives and recommendations on operational procedures of the Secretariat.

### 3.5 Investigation

22. **Resource requirement:** The onboarding of the IT Forensic Investigator is an important milestone for enhancing the Fund's investigative function. This process is expected to be completed before the end of the 2017 budget year. The delay in finalizing the recruitment resulted from certain interruptions experienced in the recruitment process which were resolved by the EAC. The investigation function will become fully functional as soon as the IT Forensic Investigator is in post, and the requisite forensic tools and IT forensic laboratory are established to support investigative activities.

23. **Networking and cooperation:** With respect to the requirement to establish and operationalise cooperation frameworks with equivalent investigative offices in other IFIs and MDBs, IIU is in the process of establishing working relationships with investigative units of other institutions, and setting up joint investigation models where possible. Specific modules of cooperation will be reflected in individual Memoranda of Understanding (MoUs) with such institutions. IIU will continue to update its contacts database of integrity offices in accredited entities and institutions with comparatively similar mandates.

### 3.6 Sanctions

24. **Requirement for sanctions system:** IFIs and MDBs, some of whom are accredited to the GCF, have established a common sanctions system to allow for the cross-debarment of entities that engage in prohibited practices. The sanctions system requires the creation of a two-tier regime for the review of investigation outcomes and the imposition of sanctions, and it serves as a due process safeguard. This sanctions system also enables the exchange of information and collaboration in investigations, lending itself to economies of scale.

25. **Cross-debarment regime:** The Terms of Reference (ToR) for the Head of IIU mandates IIU to "propose a policy for cross-debarment with peer organizations to mutually enforce each other's debarment actions". In order for the GCF to be admitted to this cross-debarment regime GCF is required to establish an independent sanctions system that meets the

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<sup>5</sup> Modalities for the organization of the Integrity Summits will be worked out with IIU counterparts in comparator institutions over the coming months, starting with discussions to be had at the Conference of International Investigators (CII) meetings in New York in October 2017.



standards of the MDBs. This would entail the creation of a two-tier system, consisting of an independent sanctions office and an appeals body.

26. **Sanctions Policy document:** Prior to the operationalization of the sanctions structures, IIU proposes, in collaboration with OGC and HR, to commence the preparatory work for a sanctions policy with a view to submitting a proposal to the Board. This preparatory work would entail the drafting of the policy for the approval of the Board, the drafting of an investigations manual in line with the Conference of International Investigators (CII) Guidelines on the conduct of investigations, and a Staff “Bill of Rights”, as well as the adoption of the Agreement on Mutual Debarment, and the Sanctioning Guidelines.

## IV. Budget Line Items

### 4.1 Staffing

28. As noted above, in order to enable IIU to fulfil its mandate, IIU requires to have a complement of specialised staff with expertise in its core areas of operations. As the immediate staffing requirement for the start-up period has been fulfilled, the additional staffing need for the 2018 budget year is as follows:

- (a) **Investigation Section:** IS4 Investigations Specialist; IS1 Investigations/IT assistant
- (b) **Prevention Section:** IS4 Compliance Officer; IS1 Data Analyst

### 4.2 Conferences and Training

29. In order to ensure that IIU is at the frontier of relevant practice and that it benefits from initiatives undertaken by integrity units of other international organizations, IIU will actively participate in the following professional conferences:

- (a) **Conference of International Investigators (CII) annual meeting:** CII is a community of practice, and the professional body that sets standards for investigative offices in international institutions, to which IIU is a registered member.<sup>6</sup>
- (b) **International Anti-Corruption Conference (IACC) biennial meeting:** IACC is a global forum to tackle the increasingly sophisticated challenges posed by corruption and other related activities. It hosts a high-level participation by heads of states, civil society and private sectors from over 135 countries worldwide.
- (c) **Training:** Relevant training programmes in fraud and corruption detection, investigation management, evidence analysis, interviewing and procurement fraud investigation will be identified for IIU staff as continuing learning opportunities to reinforce relevant skills and knowledge for optimum performance. This will be funded through IIU’s training budget.

### 4.3 Technology and infrastructure

30. The efficient conduct of IIU business will rely to a large extent on the availability of a stable and secure technology backbone. By its mandate IIU is obliged to attribute the highest priority to protecting the integrity, confidentiality and security of its evidence, records and

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<sup>6</sup> IIU will explore with the CII Secretariat the possibility of hosting the 2019 conference of the CII in Songdo

communications. It is important therefore that these technology supports are installed at this formative stage in order to ensure the protection and secure processing of confidential records from inception, and also to hedge against leakage, loss of or damage to sensitive data. In order to enable this, the following technology requirement needs to be fulfilled:<sup>7</sup>

- (a) **Case Management System:** A Case Management System for the receipt, analysis and processing of case-related information such as complaints, contacts, planning, reports, evidence, and analytical products.
- (b) **Independent Server and data storage:** An independent server and data storage application to ensure the protection, confidentiality and back-up of evidence, information and data, and that ensures efficient data storage and retrieval, and also guarantees business continuity.
- (c) **Evidence Analysis software:** An evidence analysis software (such as i2 Analyst Notebook) which is a tool for data analysis and investigation, with capabilities for graphic representation of evidence and presentation.
- (d) **Forensic tools and laboratory:** Forensic investigation laboratory equipped with relevant tools, such as EnCase and FTK for the acquisition, analysis and imaging of digital forensic evidence; a sound-proofed interview room with video conferencing equipment for remote interviews.
- (e) **Records Management System:** An electronic document and records management system (EDRMS) such as HP TRIM Records Manager. This would provide a platform for the secure management, archiving, retrieval and transmission of physical and electronic information for governance and compliance.

#### 4.4 Publications

31. **Reporting to Ethics and Audit Committee:** Article 2 of the IIU ToR requires the Unit to “report to the Board directly or through the Ethics and Audit Committee.” With the concurrence of the EAC, IIU has established a quarterly reporting scheme by which it provides at the end of each quarter a detailed overview of its activities in the immediate preceding period.<sup>8</sup> This practice will be continued in the 2018 budget year.

32. **IIU Annual Report:** IIU has an obligation to be accountable to the Board and to present periodic reports of its activities which will be issued once every year, at the end of the budget year.<sup>9</sup> The first IIU annual report will be published in the first quarter of 2018.

33. **Other Publications:** In addition to the annual report, IIU will publish and disseminate both internally and externally other documents and materials necessary for the consumption of the Board, management and staff, as well as external stakeholders of the Fund. These materials in different formats will provide critical information relating to the Fund’s internal oversight function.

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<sup>7</sup> Repeated from IIU 2017 Workplan and Budget; implementation awaits the onboarding of the IT Forensics Investigator

<sup>8</sup> IIU Q1 and Q2 reports for 2017 have been submitted to and endorsed by the EAC.

<sup>9</sup> Article 15(o) of IIU’s ToR

## Annex I: IIU Budget Execution for 2017 (as of July 2017)

		2017 Approved Budget	Actual expenditures to July 2017	% spent
<b>1</b>	<b>Salaries and consultants</b>			
1.1	Full-time staff	722,791	278,424	39
1.2	Consultancies	200,000	39,600	20
	<b>Sub-total: Salaries and consultants (1)</b>	<b>922,791</b>	<b>318,024</b>	<b>34</b>
<b>2</b>	<b>Travel</b>	75,000	34,379	
2.1	Travel			
	<b>Sub-total: Travel (2)</b>	<b>75,000</b>	<b>34,379</b>	<b>46</b>
<b>3</b>	<b>Professional services</b>			
3.1	Operating costs (including workshops)	20,000	1,200	
	<b>Sub-total: Professional services (3)</b>	<b>20,000</b>	<b>1,200</b>	<b>6</b>
	<b>Grand total (1+2+3)</b>	<b>1,017,791</b>	<b>353,603</b>	<b>35</b>

## Annex II: IIU Budget Summary for 2018

Independent Integrity Unit Budget 2018			
		Budget	Increase (%)
<b>1</b>	<b>Salaries and consultants</b>		
1.1	Full-time staff <sup>1</sup>	1,062,950	47
1.2	Consultancies	200,000	0
	<b>Sub-total: Salaries and consultancies (1)</b>	<b>1,262,950</b>	<b>36</b>
<b>2</b>	<b>Travel</b>	100,000	
2.1	Travel <sup>2</sup>		
	<b>Sub-total: Travel (2)</b>	<b>100,000</b>	<b>33</b>
<b>3</b>	<b>Professional services</b>		
3.1	Operating costs (including conferences, and workshops)	30,000	
	<b>Sub-total: Professional services (3)</b>	<b>30,000</b>	<b>50</b>
<b>4</b>	<b>Information technology and infrastructure</b>		
4.1	IT expenses (including hardware and software) <sup>3</sup>	100,000	
	<b>Sub-total: Information technology and infrastructure (4)</b>	<b>100,000</b>	
	<b>Grand total (1+2+3+4)</b>	<b>1,492,950</b>	<b>47</b>

<sup>1</sup> Estimated based on 3 IS1 staff, 2 IS4 staff, one IS6 and the Head of IIU.

<sup>2</sup> Estimated at 20 number of trips for 4 staff members, at 5,000 per trip.

<sup>3</sup> Includes the cost of purchase and license fees for CMS and other IT tools (i2 Analyst Notebook, FTK, EnCase, etc.). All purchases will be conducted according to GCF procurement rules on a best quality and cost basis.

## Annex III: IIU Table of Activities for 2018

<b>Proactive Activities</b>			
<b>No.</b>	<b>Activity</b>	<b>Methodology</b>	<b>Timeline</b>
1	Implementation and monitoring of policies	Design implementation procedures and collaborate with Secretariat	Through 2018
2	Recruitment of Staff	With support of HR	By end of Q2 2018
3	Establish Integrity Management Committee	In collaboration with Secretariat	By end of Q2 2018, with activities through 2018
4	Design Proactive Project Reviews	In collaboration with DMA and PMU	2 <sup>nd</sup> Quarter
5	Design Proactive Project Reviews	In collaboration with DMA, PMU and consultant	By end of Q3 2018
6	Participation in CPD Regional Structured Dialogues	In collaboration with CPD	Through 2018
7	Integrity Summits	To be hosted at the GCF in collaboration with external entities	Q2 and Q4 2018
8	Internal ethics and integrity training for GCF staff and Covered Individuals	In collaboration with Secretariat	Through 2018
<b>Investigation Activities</b>			
<b>No.</b>	<b>Activity</b>	<b>Methodology</b>	<b>Timeline</b>
1	Conduct of investigations	Investigation procedures as contained in the Standard. Possibility of joint investigations with AE integrity offices	Ongoing through 2018
2	Draft Staff Bill of Rights	In collaboration with OGC and HR	By end of Q2 2018
3	Adopt and incorporate CII Uniform Guidelines for Investigations and General Principles for External Review	Incorporate in Investigation Operations Manual	After EAC endorsement of Investigation Standard
<b>Sanctions Regime</b>			
<b>No.</b>	<b>Activity</b>	<b>Methodology</b>	<b>Timeline</b>
1	Draft Sanctions Policy Document	In collaboration with OGC	Finalize and present for approval at B.20
2	Draft Sanctions Procedure Guidelines	In collaboration with OGC	For endorsement by EAC after Board approval of Sanctions Policy

## Annex IV: Draft decision of the Board

The Board, having considered document GCF/B.18/XX titled “Draft 2018 Workplan and Budget for the Independent Integrity Unit”:

- (a) Approves the work plan and budget of the Independent Integrity Unit for 2018 as contained in document GCF/B.18/XX and in Annex IV therein, *i.e.*, total budgeted amount of **\$1,492,950**.
-