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2017 Annual Report of the Independent Integrity Unit

Summary

This document contains the first Annual Report of the Independent Integrity Unit for the period from November 2016 to December 2017. The report summarises the activities of IIU for the period and outlook for 2018.

About the Independent Integrity Unit

The Independent Integrity Unit (IIU) ensures all Green Climate Fund (GCF or Fund) staff, in addition to external stakeholders, implementing entities and intermediaries relating to GCF adhere to the highest standards of integrity.

The IIU investigates allegations of fraud, corruption, misconduct and other prohibited practices. These include coercive and collusive practices, abuse, conflict of interest and retaliation against whistleblowers.

The IIU also takes a proactive approach to prevent fraud and corruption and other prohibited practices, by establishing integrity policies and guidelines. It also recommends further improvements to existing GCF policies and procedures.

The IIU promotes awareness of GCF's integrity standards with implementing entities and intermediaries, and executing entities. It also collaborates and shares experiences with multilateral funds, international finance institutions and other relevant parties about integrity matters.

As an independent body from the Secretariat, the IIU reports directly to the GCF Board and the Ethics and Audit Committee (EAC), which is made up of GCF Board members.

Contact information

For further information or to submit complaints on suspected fraud, corruption or other prohibited practices to the IIU, please email, telephone or write to the IIU address below.

Email: integrity@gcfund.org

Telephone: +82 32 458 6155

Head
Independent Integrity Unit
Green Climate Fund
Songdo International Business District
175, Art Center-daero
Yeonsu-gu, Incheon 406-840
Republic of Korea

www.greenclimate.fund/independent-integrity-unit

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Executive Summary

The Independent Integrity Unit (IIU) is mandated to perform the essential function of safeguarding the lawful and efficient utilization of Green Climate GCF(GCF) resources. Additionally, the IIU is mandated to promote integrity of the people and organisations involved in the GCF's work and mission to mitigate serious climate change. Finally, the IIU is mandated to investigate reports of suspected prohibited practices and recommend corrective measures in line with best international practices.

Proactive Activities

In 2017, and in accordance with its mandate, the IIU made important headway in establishing core policies and procedures for proactively preventing, detecting and investigating integrity violations. The IIU undertook the following key proactive activities:

- led the development of the Anti-Money Laundering and Countering the Financing of Terrorism Policy (AML/CFT) which was adopted by the GCF Board in October;
- drafted a Whistleblower and Witness Protection Policy, a Policy on Prohibited Practices, an Investigation Standard, and an Integrity Due Diligence Policy for Private Sector Operations – all of which are under review for adoption in 2018;
- developed and provided a full range of guidance for integrity matters in the GCF operations
- reviewed legal agreements negotiated with Accredited Entities and delivery partners;
- provided support to Accredited Entities seeking to improve their own integrity frameworks;
- provided advice on five cases involving Conflict of Interest, all of which were resolved; and
- began developing a proactive, risk-based approach to support the capacity development needs and early integrity risk detection for the GCF resource recipients.

To raise awareness of the GCF's integrity policies and related integrity matters, the IIU:

- proactively engaged with GCF stakeholders at national, regional and international levels;
- enhanced its webpage for easy access to its policies and reporting integrity violations; and
- provided training for GCF staff on the integrity requirements and developed a database of offshore and online training and learning resources.

Investigations

The IIU undertook the following key activities relating to investigating prohibited practices:

- reviewed 10 allegations of Prohibited Practices. Of those, one was resolved, one was suspended, four were determined to be outside of the IIU mandate and four are ongoing;
- developed cooperative investigation agreements with Accredited Entities' counterparts; and
- significantly, was admitted to the Conference of International Investigators (CII), and United Nations Representatives of Investigative Services (UN-RIS).

Overall, the IIU exceeded the primary goals proposed in its 2017 workplan with a capacity of two staff and two part-time consultants in place intermittently from April.

2018 Outlook

Looking ahead, having laid the considerable groundwork in 2017 and with the recruitment of additional staff, the IIU's focus in 2018 will be on ensuring the effective implementation of the GCF's integrity policies, and ensuring the prompt resolution of allegations of prohibited practices. In line with the GCF's ambition and high-risk nature, it will be important to prioritise also capacity building of its stakeholders, early detection of integrity risks through proactive project reviews, and effective investigation approaches, particularly regarding the downstream devolution of GCF resources. In conjunction, it has proposed a GCF Integrity Management Committee to facilitate effective collaboration with the Secretariat.

I. Proactive Activities

1. The IIU is mandated to promote the integrity of the people and organisations involved in the GCF's work and mission to mitigate serious climate change.
2. To implement its mandate, the IIU takes a proactive approach to prevent fraud, corruption and Prohibited Practices, by developing a preventative strategy to build institutional resilience against fraud and corruption - establishing integrity policies and guidelines, recommending improvements to existing GCF policies and business procedures and identifying integrity risks the GCF is facing and developing mitigating measures.
3. The IIU promotes awareness of GCF's integrity standards with all parties involved in the GCF activities including implementing entities, intermediaries and project executing entities. It also collaborates and shares experiences with multilateral funds, international finance institutions and other relevant parties about integrity matters.
4. Numerous integrity related proactive initiatives were undertaken in 2017 in collaboration with the Secretariat including the Office of the Internal Audit, Office of General Counsel, Office of Risk Management, Human Resources, Procurement and Division of Country Programming. The proactive activities including policy development and preventative activities are summarised below.

1.1 Policy Development

5. In 2017, the IIU undertook the drafting, socialising and raising awareness of key integrity policy documents. The policies drafted included the following:
 - (a) **Anti-Money Laundering and Countering the Financing of Terrorism Policy** (AML/CFT) – the Policy outlines the principles and minimum standards of internal AML/CFT controls which should be adhered to by the GCF to mitigate reputational, regulatory, legal and financial loss risks. The Policy was developed in collaboration with the Secretariat and underwent thorough review by the Ethics and Audit Committee (EAC) before submission to the Board and was adopted at B.18. The standards for the implementation of the AML/CFT Policy will be further developed by the IIU with the collaboration with the Secretariat for consideration by the Board in 2018.
 - (b) **Whistleblower and Witness Protection Policy** – the Policy aims to enhance the Fund's capacities to detect and mitigate wrongdoing at an early stage and to minimize risks, while supporting the Fund's efforts to safeguard its people and resources. It sets out principle, obligations and procedures to enable confidential and anonymous reporting of suspected wrongdoing in GCF related activities and deter retaliation against whistleblowers and witnesses. The Policy has been through an extensive socialisation process where comments and feedback were obtained from nine public and non-governmental organisations and the Secretariat for consideration by the Board at the 19th Board Meeting in 2018;
 - (c) **Policy on Prohibited Practices** – proposed for adoption in 2018, the Policy on Prohibited Practices imposes obligations and outlines a range of sanctions or disciplinary measures in response to Policy breaches. Drawing on international best practices, the Policy elaborates and updates the GCF's General Principles on Prohibited Practices;
 - (d) **Investigation Standard** – a draft standard, supporting the Policy on Prohibited Practices was prepared in 2017. The standard seeks to establish the minimum standards by which investigations are undertaken in the GCF, ensuring quality investigations are

conducted ethically, consistently, there is confidence in the process. The Standard is awaiting review and approval by the Board in 2018;

- (e) **Integrity Due Diligence Policy for Private Sector Operations** – the Policy seeks to establish the minimum integrity due diligence requirements for the GCF in dealing with private sector entities. The policy is awaiting review by the Ethics and Audit Committee in 2018;

1.2 Guidance for integrity matters in the GCF operations

1.2.1 Review of Operational Agreements

6. One aspect of the IIU's mandate is to ensure full compliance of the GCF fund recipients with the GCF integrity policies and standards. In implementing its mandate, the IIU reviewed, provided improvements and engaged in negotiations with the Accredited Entities (AE) and delivery partners on provisions regarding integrity issues on the following agreements and documents:

- (a) Accreditation Master Agreements (AMAs);
- (b) Grant Agreements for the Readiness and Preparatory Support Programme;
- (c) Funded Activity Agreements (FAAs); and
- (d) REDD-plus results based payments templates.

1.2.2 Engagement with key stakeholders

7. Another critical aspect of the IIU mandate is to ensure timely and relevant stakeholder engagement. In its first year of operations, the IIU has lent its advisory and investigative roles to enable persons to understand and act on integrity concerns. This has involved building trust and a strong reputation for independence and integrity at the Secretariat and throughout the Fund.

8. To maximise synergies and economies of scale, the IIU actively participated in Board Meetings, Direct Access Workshop and Regional Structured Dialogues organized by the Division of Country Programming to engage with the country representatives, AEs and Civil Society Organizations (CSOs). The latter provide a platform to share GCF's integrity standards to key stakeholders and provide an advisory function in helping build integrity capacities, such as drafting of policies and frameworks, especially to direct access entities and countries where institutional integrity frameworks need potential enhancing.

9. As a by-product of these engagements, the IIU established cooperation with the Fund's Regional Coordinators who have the responsibility to oversee the implementation of the GCF Readiness Programme in the regions. At B.17, the IIU also held an initial meeting with CSOs with a view to holding regular dialogues for support and sharing information. Through these cooperative arrangements, the IIU aims to extend its reach to the GCF external entities.

10. The IIU is establishing working relationships with integrity offices of AEs starting by signing a Memorandum of Understanding (MoU), agreeing on specific modalities of cooperation on institutional integrity issues and investigative activities relating to Prohibited Practices. In parallel, the IIU is pursuing collaborative approaches to support *effective preventative actions against* Prohibited Practices. In December, the IIU participated at the Climate Finance Integrity peer to peer learning workshop to support current and potential AEs and EEs in designing and implementing effective anti-corruption and whistleblowing policies and practices. The

workshop was organised by OECD, UNDP, GIZ and TI as a pilot programme of the Effective Institutions Platform.

11. Through these engagements, and gathering a more comprehensive view of integrity risks and capacity development needs, plans to organise regional or possibly a global level Integrity Summit in 2018 were developed. Aimed at developing capacities and driving innovative strategies, GCF Integrity Summits are learning and networking forums for practitioners engaged in preventing, detecting, investigating and correcting integrity violations in GCF projects and programmes. Requested by Direct Access Entities and project beneficiaries, the Summits enable participants to share practical experiences, challenges and solutions and to develop reliable partnerships supporting peer advisories and cooperation.

12. On a demand basis following a risk based approach, the IIU supports counterparties by providing policy advice and operational guidance. One of the attributes of the GCF is its strong support for enable country level organisations to directly access climate finance. At the same time, the GCF progressively sets high standards for fiduciary integrity. Ensuring that those standards are implemented effectively standards of integrity aims in a variety of diverse cultural and political settings and by organisations with limited capacities and resources, often beckons the need for enhanced support. The IIU has provided policy and practice advice to a number of potential and existing AEs on GCF standards, on how to ensure that their integrity mechanisms are independent and free from interference, and on how to effectively engage with local stakeholders and protect those who report suspected wrongdoing.

13. The IIU held a strategic offsite, where IIU staff discussed 2017 activities and how to continue to effectively engage key stakeholders. As such, key takeaways from the IIU offsite were to identify integrity risks that the GCF is facing and strategize and prioritise activities of the unit accordingly such as conducting proactive fraud and corruption reviews of existing projects, strengthening engagement with direct access entities to help build their capacity with institutional integrity frameworks and promoting integrity campaigns among stakeholders and throughout the GCF to effectively prevent occurrences of integrity violations.

1.3 Engagement with international networks

14. In fulfilling its mandate of actively participating in relevant networks and collaborating with international financial institutions (IFIs) and multilateral development banks (MDBs) to ensure that the IIU is at the frontier of relevant practice and benefit from initiatives undertaken by them, the IIU initiated contacts with these offices and other multilateral agencies with a view to exchanging information and professional experience for peer learning.

- (a) *OECD Anti-Corruption and Integrity Forum*: In March, the IIU joined with high level representatives from the Global Environment Facility, the European Investment Bank and the Ministry of Foreign Affairs of Argentina special panel at the Forum to share key strategies to strengthen policies and mitigate the critical corruption risks to decarbonising economies. The importance of that effort was underscored as risks of corruption and fraud undermine the crucial role of climate finance in shifting and leveraging public and private investment towards achieving the COP 21 climate targets, by disturbing level playing fields, deterring sustainable investments and escalating costs for economies and citizens.
- (b) *CII and UN-RIS*: Four months into the operationalization of the IIU, it was admitted to membership of two of the foremost investigation networks, namely, the United Nations Representatives of Investigative Services (UN-RIS) and the Conference of International

Investigators (CII), the professional body that sets standards for investigative offices in international institutions.

15. CII conference attendance and hosting of the 2018 international CII conference

At the CII's annual meeting held in October, numerous key topics were discussed, including:

- (a) Cooperation with national authorities and between international organizations;
- (b) Fraud & corruption – trends, methods & tools;
- (c) How to effectively investigate implementing entities; and
- (d) Environmental & social compliance investigation.

These discussions translated to action items which have been included in the IIU's 2018 Workplan. One significant item arising was the CII Secretariat offering the IIU to host the 19th conference in 2018 and with the approval of the Chair the EAC, the IIU accepted the offer, expecting the following outcomes:

- (a) The IIU and the GCF will benefit from hosting the Conference as many of the members of CII are GCF AEs, and therefore the Conference provides a platform to establish effective collaboration with the integrity offices of the AEs;
- (b) The Conference will provide a platform to discuss integrity issues, address challenges in fighting fraud and corruption, receive new developments and share leading practices. It enables collegiality and close cooperation among investigative offices of participating organizations and provides guidance; and
- (c) As the latest member of the renowned network, the GCF will take this opportunity to raise its profile in the international community.

1.4 Raising awareness of integrity standards

1.4.1 Training

16. The IIU, as a part of its integrity preventative initiatives, has been developing trainings to the Fund's staff and external stakeholders on integrity matters.

- (a) The IIU engaged with the Secretariat on developing the training on preventing workplace harassment to the Fund's staff and other stakeholders. This training is organized as the mandatory online course with an examination at the end. After successfully passing the final exam employee receives the certificate of completion.
- (b) The IIU regularly delivers presentations for induction sessions to new GCF staff, where the role and mandate of the IIU was explained and contacts for allegation escalation was provided.
- (c) The IIU also participated in a procurement workshop held by the Secretariat where the head of the IIU gave a presentation on integrity matters on institutional procurement.

1.4.2 Training for the IIU staff

17. The IIU staff participated in the training on Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Framework organized by the Office of Internal Audit, and in the Knowledge Management training organized by the Secretariat. The IIU also took part in a workshop organized by the Division of Country Programming regarding recent trends in climate finance.

18. The IIU also organized internal training for the IIU staff regarding investigation standards and techniques. Additionally, the IIU developed a database for online and offshore training and learning opportunities for the IIU staff, with a plan to undertake relevant training in 2018.

1.4.3 Communications

19. The IIU established [the website](#) where information on integrity policies and documents are published. It also provides the information on how to report allegations.

20. Additionally, the IIU produced documentation describing Prohibited Practices and stakeholders' obligation to report in the form of pamphlets and *Frequently Asked Questions* which have been made available to the external entities at the regional workshops.

21. In recognition of International Anti-Corruption Day on 9 December, the IIU published newsletter for all GCF staff, inviting all GCF colleagues to reaffirm their commitment to upholding the highest standards of integrity in the execution of their responsibilities in supporting objectives of the GCF. The IIU reinforced its mandate, to proactively manage integrity risks and investigate prohibited practices.

1.5 Advisories on Conflicts of Interest

22. In consultation with the EAC, the IIU issued advisories on five CoI declarations during 2017, mostly related to self-reported cases where individuals covered under the different CoI policies reported actual or potential conflicts.

23. The IIU established a "Conflicts of Interest (CoI) Register" to enhance tracking and monitoring of the cases filed.

24. To better implement the conflict of interest policies and to promote disclosure and declaration of potential and apparent CoI by covered individuals, the IIU is currently developing guidelines for the policies which will be presented to the EAC for its review and endorsement in 2018. The guidelines are tailored to specific risk areas and address some of the challenges the IIU is facing in managing CoI cases such as limited awareness among covered individuals of what constitutes CoI. In Parallel, to better put CoI regulations into practice, training and awareness campaigns will be accompanied and strengthened.

Table 1: Conflict of interest received and advised in 2017

	Subject	Description	Advisory
1.	Member of Independent Panel	Potential CoI in Accredited Entities' secondment to the GCF.	As it constitutes CoI, it was recommended not to pursue the secondment.
2.	Member of Independent Panel	Potential CoI in the exercise of function as a member of an Independent Panel and concurrently as an entity bidding to implement a GCF project.	It was concluded that perceptions of CoIs existed and it was recommended not to pursue the activity.
3.	Board-appointed official	Declaration of potential CoI in respect of external engagements by a Board-appointed official.	It was advised that it was not in conflict with the subject's GCF duties and request to undertake such

			external activities in the subject's own time.
4.	Member of Independent Panel	Potential CoI declared by a member of an Independent Panel in engaging in external activities.	It was advised that the subject should not engage in the activities on behalf of the GCF and should inform the external affiliation accordingly.
5.	Board-appointed official	Declaration of potential CoI in respect of external engagements by a Board-appointed official.	It was advised there was neither an actual nor a perceived CoI.

II. Investigations

25. The IIU is mandated to investigate allegations of fraud, corruption and other prohibited practices, outlined in the General Principals on Prohibited Practices and allegations of staff misconduct, involving violations of the Code of Conduct. The investigative activities of the IIU for the reporting period from November 2016 to December 2017 are summarised below.

26. Since its establishment, the IIU has received a total of 10 allegations (refer Table 2 and Figure 1 below) categorised as follows:

- (a) two (2) allegations related to fraud;
- (b) one (1) allegation – collusion;
- (c) two (2) allegations – misconduct;
- (d) three (3) allegations – staff disputes; and
- (e) two (2) allegations were classified as others.

27. The three (3) allegations relating to staff disputes and two (2) allegations classified as others were assessed not to fall within the IIU mandate as the substance of the complaints covered human resources related matters and matters not related to the GCF activities.

28. Prior to the establishment of the IIU, the Internal Audit conducted investigations into three allegations. The investigation reports were transferred to the IIU in November 2016 and a post-investigation review was undertaken to ascertain the completeness of the investigation conducted and to follow-up on the findings.

29. The number of allegations received in 2017 is explained by the establishment of the IIU and the acknowledgement and utilisation of its functions by GCF staff and external stakeholders.

Table 2: Allegations received by the IIU

Type of Allegations	2016	2017
Allegations reported to the IIU	1	9
Allegations carried forward from previous period	3*	1
Allegations closed at preliminary assessment	0	5
Investigations opened	1	4
Investigations suspended	0	1
Investigations finalized	3*	2
Investigations carried forward to next period	1	2

*Investigations conducted by Internal Audit prior to the establishment of the IIU.

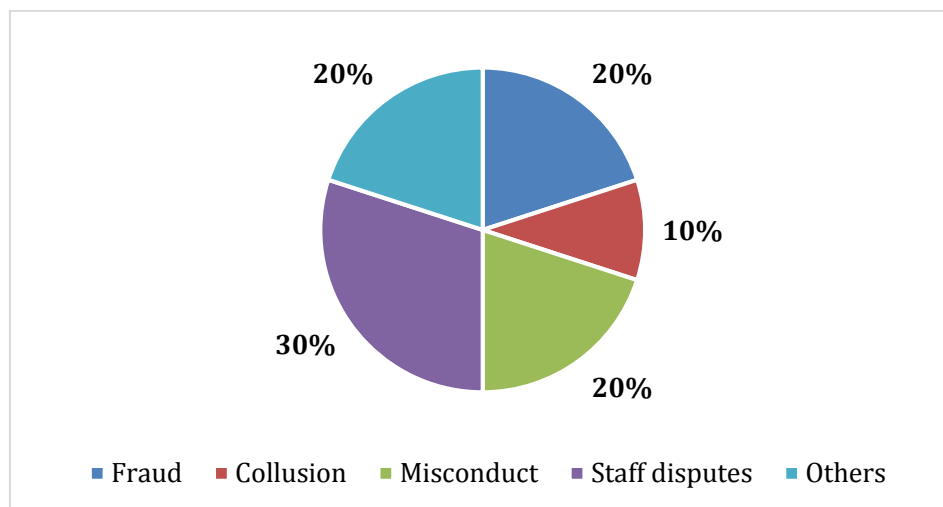


Figure 1. Type of allegations

30. The subjects of majority of the allegations submitted to the IIU were individuals, with only two (2) complaints made against entities. This correlates with the fact that the prevailing number of allegations were submitted internally (by GCF staff or ex-staff), while three (3) allegations were received from external sources (refer Figure 2 and 3 below).

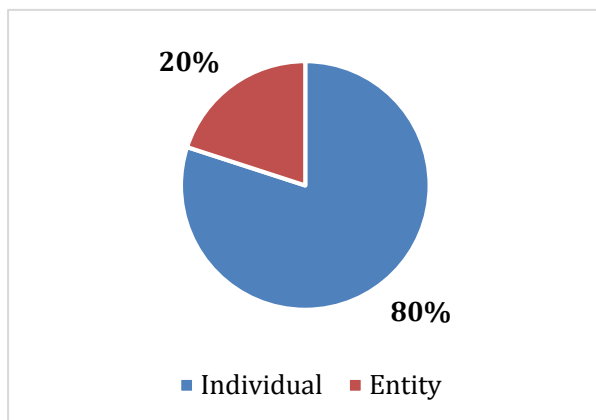


Figure 2. Subject of allegations

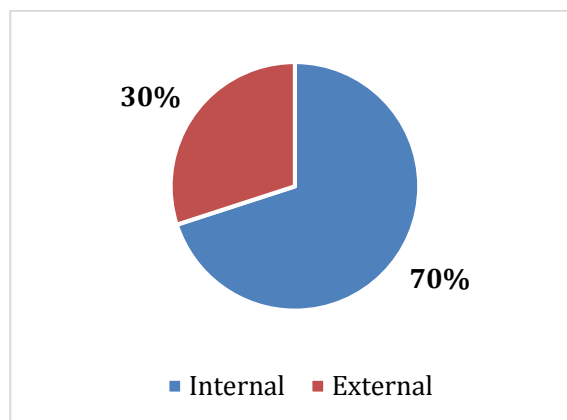


Figure 3. Source of allegations

31. Details of the allegations received by the IIU are summarized in Table 3 below.

Table 3: Summary of allegations received by the IIU

Ref No.	Mode of Escalation	Allegation Description	Assessment & Basis	Outcome/Comment
001/16	E-mail letter	Allegation of sexual assault by GCF employee against external individual.	Allegations within the IIU mandate regarding the staff misconduct.	Investigation finalized. Report to be submitted Executive Director
001/17	E-mail letter	Allegation of collusion between NDA and delivery partner.	Allegations within the IIU mandate	Requested three-months suspension of the project and



			regarding the prohibited practices.	conduct of enhanced due diligence. Additional information requested from complainant. Case suspended until information is provided.
002/17	E-mail letter	Allegation of abuse of authority and harassment against GCF employee by several GCF employees.	Allegations outside of the IIU mandate.	No investigation commenced. Allegation referred to General Counsel.
003/17	E-mail letter	Dispute regarding performance evaluation and proper working duties.	Allegations outside of the IIU mandate.	No investigation commenced. Complainant advised.
004/17	E-mail letter	Dispute regarding individual consultancy fee.	Allegations outside of the IIU mandate.	No investigation commenced. Complainant advised.
005/17	E-mail letter	Allegation of that a senior official assisted a prospective staff member to propose favourable terms in the negotiation of the contract with the GCF.	Allegations outside of the IIU mandate.	No investigation commenced. Allegation referred to General Counsel for advice on jurisdiction.
006/17	E-mail letter	Allegation of misrepresentation of credentials in the CV.	Allegations within the IIU mandate regarding the staff misconduct.	Investigations commenced. Main investigative activities completed.
007/17	Anonymous letter	Allegation of fraud in relation to the funding proposal.	Allegations within the IIU mandate regarding the prohibited practices.	Investigations commenced. Completed preliminary investigative activities.
008/17	E-mail letter	Allegation of destruction of mangrove ecosystem in the recipient country.	Allegations outside of the IIU mandate?	Commenced preliminary assessment. ?
009/17	E-mail letter	Allegations of conflict of interest, corruption and mismanagement.	Allegations within the IIU mandate regarding the prohibited practices.	Commenced preliminary investigative activities.

32. The IIU expects the number of allegations submitted to IIU will gradually increase over 2018 as more awareness raising activities are undertaken with the Fund, implementing entities, intermediaries, other external stakeholders and beneficiaries regarding GCF integrity related policies.

III. Resource Utilization

3.1 Staffing

33. The immediate staffing requirements for the start-up period of the IIU has been fulfilled. Two staff positions approved by the Board in 2017 were advertised and recruited - the

Operations Analyst and IT Forensics Investigator. The team assistant, policy development consultants and an intern were also hired to support the IIU.

34. The IIU staffing needs for 2018 to cover all the work areas of the IIU and to have a complement of specialised staff with expertise in core areas of operations are set out below.

- (a) Investigation section: Investigations Specialist; Investigations/IT assistant.
- (b) Prevention section: Compliance Officer; Data Analyst.

3.2 Technology

35. The IIU is currently reviewing various technology solutions to assist in its proactive and investigations operations. The main areas of focus relate to a stand-alone investigation case management tool and an integrity due diligence tool. The IIU continues to collaborate with the Secretariat regarding the due diligence tool and the hiring of forensic investigative staff will assist in the review, selection and operationalisation of the investigation case management tool in Q1 2018.

3.3 Budget execution

36. A significant part (90%) of the budget approved in 2017 for the IIU has been earmarked for staffing expenses required to set up the Unit and the IIU spent 58% for two staff members, two part-time consultants and one intern. Professional services include the estimated cost for the establishment of a custom-built case management system and other technology solutions and hosting of the workshops which is in progress.

Table 4. IIU budget execution for 2017

		2017 Approved Budget (USD)	Actual expenditures in 2017 (USD)	% spent
1	Salaries and consultants			
1.1	Full-time staff	722,791	404,948	56
1.2	Consultancies	200,000	128,229	64
	Sub-total: Salaries and consultants (1)	922,791	533,177	58
2	Travel	75,000	64,883	87
2.1	Travel			
	Sub-total: Travel (2)	75,000	64,883	87
3	Professional services			
3.1	Operating costs (including workshops)	20,000	341	2
	Sub-total: Professional services (3)	20,000	341	2
	Grand total (1+2+3)	1,017,791	598,401	59

IV. 2018 Outlook

37. Drawing on the experience of similar multilateral funds, with the commencement of the execution of approved funding proposals and Readiness and Preparatory Programmes,

emerging GCF integrity risks are expected to occur in subcontracting and devolved financing arrangements such as collusion, fraudulent accounting, misrepresentation and money laundering (particularly where trust funds are set up to sequester and deploy climate finance).

38. Overall, the protection of whistleblowers and witnesses against retaliation will be challenging in some environments. Collaborative efforts will be pursued as far as possible to ensure the effective implementation of GCF integrity policies in its activities.

39. The IIU will continue its work on preventative activities, advisory functions and investigations described in this report, prioritising the activities summarised below:

- (a) The IIU will continue to draft policy and operational guidance related to integrity matters for the Fund's operations. In addition, the IIU will present implementation procedures for the AML/CFT Policy, conflicts of interest and other integrity policies.
 - (b) The IIU proposed to engage with the Secretariat to establish an Integrity Management Committee (IMC). The proposed IMC will be constituted by directors and/or appointed focal points from each division to discuss and manage integrity issues which could arise during GCF operations;
 - (c) The IIU will continue to participate in Structured Dialogues hosted by the Secretariat to proactively engage and help build capacity of AEs and countries;
 - (d) The IIU will further cooperate with other international counterpart authorities with the hosting of the 19th Conference of International Investigators as a platform;
 - (e) The IIU will continue to develop training and peer learning opportunities including materials and information exchange platforms on integrity matters for internal and external stakeholders;
 - (f) More information on IIU's 2018 proactive activities are summarised in the 2018 IIU Workplan and Budget.
-