Fast-track accreditation programme update

This document captures the programme as approved by the Board in decision B.42/13, paragraph (j). The updated programme was sent to the Board for consideration at B.42 in document GCF/B.42/04/Add.01 titled “Accreditation Framework”.

All decisions and documents adopted at B.42 can be found in document GCF/B.42/18 titled “Decisions of the Board – forty-second meeting of the Board, 30 June – 3 July 2025”.

GREEN CLIMATE FUND

I. Introduction

1.1 Background

1. A fast-track accreditation programme was introduced in 2014, at the eighth meeting of the Board (B.08). In decision B.08/03, paragraph (c), the Board decided that the purpose of fast-track accreditation is to expedite the accreditation of entities – including subnational, national, regional and international entities – that have already been accredited by a relevant fund or institution that has an accreditation process, and whose fiduciary and environmental and social standards are found to be comparable to the GCF fiduciary standards and environmental and social safeguards (ESS).

2. Pursuant to decision B.08/03, entities accredited by the Global Environment Facility (GEF), the Adaptation Fund (AF) and the Directorate-General for International Partnerships (DG INTPA) (Directorate-General for International Development and Cooperation (DG DEVCO) at the time) are eligible for the fast-track accreditation programme.[1]

3. In paragraph (k) of decision B.08/03, the Board requested the Secretariat, in consultation with the Accreditation Panel (AP), to identify other entities applying fiduciary and environmental and social principles or standards found to be comparable with the GCF fiduciary standards and ESS, and to propose to the Board that the eligibility to apply under the fast-track accreditation programme be extended to those entities.

4. In connection with the proposed revisions to the accreditation framework being presented to the GCF Board at B.42 – and the proposal to assess applicants against screening requirements that are a subset of the fiduciary principles and standards[2], ESS and other relevant policies, including the Gender Policy – it is necessary to assess the implications for the fast-track accreditation programme. Within this context, the Secretariat has updated the underlying gap analysis of the current fast-track accreditation programme and has undertaken a gap analysis comparing the proposed GCF accreditation screening requirements with the relevant requirements of a set of major multilateral development banks (MDBs) active in the climate finance landscape.

5. This document presents (a) an updated gap analysis comparing the GEF, AF and DG INTPA accreditation requirements with the proposed screening requirements; (b) a gap analysis comparing the proposed GCF accreditation screening requirements with the relevant requirements of two MDBs active in the climate finance landscape; and (c) a recommendation to extend the fast-track accreditation programme to entities assessed against comparable standards of the specified MDBs.

[1] Paragraphs (e), (f) and (g) of decision B.08/03.
[2] Decision B.07/02.

II. Policy rationale and analysis

2.1 Fast-track programme: state of play

6. Entities are currently eligible for fast-track accreditation if they are:

(a) accredited by GEF and AF; or

(b) assessed against the DG INTPA (formerly DG DEVCO) pillars.

7. The current fast-track accreditation programme was adopted based on gap analyses of the relevant standards and policies of the above organizations against the GCF accreditation standards (annex III to decision B.08/03).

8. Since the approval of the above-mentioned fast-track accreditation programme, 49 out of 145 GCF accredited entities (AEs) (34 per cent) have been accredited under the GCF fast-track accreditation programme. With regard to reaccreditation, 23 out of 31 AEs (74 per cent) have been reaccredited via the fast-track accreditation programme.

9. To date, the median review time for applications under the fast-track accreditation programme has been 60 per cent lower than the review time for applications on the normal track. However, it is important to note that, given the diversity of GCF applicants, the median time serves as a high-level approximate indicator.

10. Out of 150 applicants in the accreditation pipeline as at 30 April 2025, only eight entities (5 per cent) are eligible and have applied to be fast-tracked under the existing fast-track accreditation programme.

2.2 Gap analysis of the Global Environment Facility, Adaptation Fund and Directorate-General for International Partnerships requirements against the proposed screening requirements

11. The revised accreditation framework (RAF) proposes to refocus accreditation as a fit-for-purpose institutional due diligence process for prospective applicants, and to improve the speed and efficiency of the accreditation process, enhance fairness, and improve transparency and predictability.

12. To streamline the accreditation process, applicants for accreditation would be assessed against screening requirements which are a subset of the fiduciary principles and standards, the environmental and social standards, and relevant policies. Additional applicable fiduciary standards and environmental and social standards would be assessed, if relevant, during the assessment of a funding proposal submitted by the AE.

13. Given the proposed changes to the GCF accreditation requirements, the Secretariat and the AP have undertaken an update of the gap analyses approved by the Board in decision B.08/03 to determine how the relevant GEF, AF and DG INTPA fiduciary and environmental standards should apply against the screening requirements for accreditation.

14. A summary of the updated gap analysis in respect of each institution under the existing fast-track accreditation programme is set out below:

(a) **GEF.** Noting that all GEF agencies are already accredited to GCF through the fast-track accreditation programme, and that GEF does not have a reaccreditation process per se, no implications are foreseen from the changes to the GCF accreditation requirements for fast-tracking based on GEF standards;[3]

(b) **AF.** Regarding AF standards, a review of the 2024 gap analysis conducted by AF[4] indicated that these standards remain broadly consistent with GCF accreditation standards and policies, particularly in areas such as financial controls, project evaluation and prohibited practices. However, key differences remained in anti-money-laundering and countering the financing of terrorism (AML/CFT), conditional accreditation and legal status reviews. A gap analysis against the proposed screening requirements concluded that no changes in eligibility of the entities accredited by AF would be triggered by the proposed RAF and assessment against the screening requirements. The Secretariat will further consult with AF in respect of how the application of GCF screening requirements for the purposes of accreditation might affect the approach of AF to fast-tracking GCF AEs for AF (re)accreditation; and

(c) **DG INTPA.** Regarding pillar assessments conducted by DG INTPA, a gap analysis against the screening requirements concluded that the proposed screening requirements would not trigger any changes in fast-tracking entities accredited by DG INTPA.

15. A mapping of the relevant AF, GEF and DG INTPA standards against the proposed screening requirements is presented in table 1 below.

2.3 Fast-track accreditation programme extension

2.3.1. Drivers for the extension of the fast-track accreditation programme

16. Further to the purposes of the fast-track accreditation programme as outlined in decision B.08/03, an extension of the approach is in line with the Governing Instrument for the GCF, which directs GCF to promote complementarity between the activities of GCF and the activities of other relevant bilateral, regional and global funding mechanisms and institutions, in order to better mobilize the full range of financial and technical capacities. In decision B.17/04, the Board adopted the operational framework on complementarity and coherence with a view to strengthening complementarity and enhancing coherence among operations and processes across climate finance institutions.

17. The updated Strategic Plan for the GCF 2024–2027 further guides GCF to strengthen complementarity and coherence with the broader climate finance architecture, including other climate funds and other financiers operating in the climate finance landscape.

18. In accordance with paragraph (k) of decision B.08/03, the Secretariat undertook an analysis of MDBs active in climate finance to assess whether they had fiduciary standards and environmental and social principles or standards that are comparable with the GCF fiduciary standards and ESS relevant to the screening requirements.

[3] At the 69th meeting of the GEF council, a decision was adopted regarding the options for GEF extension and fast-track accreditation. The Secretariat will conduct further analysis in light of the above decision and inform the Board if the decision adversely impacts the analysis set out in this paper.

[4] *Decision of the Adaptation Fund Board at its Forty-Second Meeting*. Available at www.adaptation-fund.org/wp-content/uploads/2024/04/AFB.B.42.16_Decisions-taken-by-the-Board-at-its-42nd-meeting.pdf.

19. An extension of the fast-track accreditation programme would reduce duplication for applicants and expedite the accreditation of qualifying entities, without compromising the GCF standards. Extending the fast-track accreditation programme is intended to result in an increase in the ratio of direct access entities (DAEs) to international access entities in the AE network. An extension of the fast-track accreditation programme could contribute to the objectives of the revisions of the accreditation framework by streamlining accreditation assessments for qualifying applicants by focusing the assessment of the applicants' capacities and systems on those areas not already assessed by the comparable fund or institution.

20. The GCF accreditation system is unique among development sector organizations, with the exception of those of its sister climate funds that also operate on an accreditation basis. Most other financiers employ a project- or programme-level due diligence approach, rather than an institutional accreditation process.

21. Nevertheless, experience has shown that some GCF accreditation requirements overlap with the fiduciary standards assessed during the due diligence practices of other providers of climate finance, leading to potential duplication of effort by applicants. Feedback from GCF applicants with strong track records with international financiers suggests that reducing duplication in the GCF accreditation review could yield mutual benefits, especially if the applicant's prior experience with other development organizations is taken into account. If GCF can rely on the assessment of a fund or institution that applies comparable fiduciary standards or ESS in its due diligence processes, GCF can focus its assessment on whether the applicant adequately meets the relevant screening requirements in areas where there are gaps.

22. Following a request from the Accreditation Committee, the AP conducted an analysis of the fiduciary standards, environmental and social standards, and due diligence approaches used by MDBs, development finance institutions, central banks and international benchmarking systems. This analysis confirmed a potential overlap and alignment between the fiduciary standards assessed during the partner due diligence processes implemented by multilateral institutions (in particular, MDBs) and the GCF accreditation requirements. The analysis also identified that there are gaps between the due diligence processes and the GCF accreditation requirements.

23. In particular, fiduciary management and governance, administrative capacity (including procurement), and (with certain limitations) project management were found to be comparable to the relevant GCF fiduciary standards.

24. Potential alignment in respect of aspects of integrity was also identified. However, there was limited alignment between what GCF expects from applicants for accreditation and what MDBs expect from their partners and implementing agencies in terms of approaches to environmental and social management systems and gender. Additionally, it was established that if the fast-track accreditation programme were to be extended to funds or institutions conducting project-level partner due diligence, additional criteria would need to be defined to specify the nature and scope of such due diligence.

25. To further refine the scope of the extension of the GCF fast-track accreditation programme, the Secretariat identified a group of MDBs with an established reputation and broad operational scope in climate finance. These MDBs have recognized due diligence systems and a geographical scope that aligns with the GCF commitment to significantly enhancing access to GCF finance for developing countries, particularly those without a national direct access entity with GCF. Further, the identified MDBs invest in the project types and provide financing to public and private sector entities that align with the objectives and activities of GCF.

26. A gap analysis to identify comparability of the fiduciary standards and environmental and social standards was undertaken in connection with a potential extension of the fast-track accreditation programme. The analysis was conducted on the basis of publicly available information of the assessment and due diligence processes for the World Bank, European Bank for Reconstruction and Development, African Development Bank (AfDB), and International Finance Corporation.

27. After consultations with internal and external stakeholders, including the institutions in question, the analysis of fiduciary standards assessed through the due diligence systems of the World Bank[5] and AfDB[6] were finalized in time for presentation at B.42 and the gap analysis is presented in table 2 below.

28. The Secretariat will continue to work on the gap analysis of other funds and institutions that have accreditation processes or due diligence systems, whose fiduciary and environmental and social standards could be comparable to those of GCF. The Secretariat will engage with the respective focal points of these funds and institutions to establish the potential scope and comparability of their due diligence and assessment processes. The Secretariat will work towards proposing to the Board a further extension of the fast-track accreditation programme to be considered for GCF applicants that have undergone review by those funds and institutions.

2.3.2. Assessment of World Bank and AfDB

Geographical scope

29. The World Bank and AfDB have wide-ranging operations with the World Bank being present in more than 170 countries in Africa, Asia and Pacific, Latin America and the Caribbean, Europe and Central Asia, and Middle East and North Africa, and AfDB present in all 54 African states covering North Africa, Sub-Saharan Africa and Southern Africa. Extension of the fast-track programme is expected to allow GCF to increase share of DAEs in its AE network. The pilot extension would facilitate the review of World Bank and AfDB partners, such as ministries of finance, sectoral ministries, state-owned enterprises, and private sector entities in respect of AfDB, in particular those in countries that do not yet have a DAE.

30. Out of 105 countries without national DAE in GCF's network of partners, the World Bank has 77 active projects or programmes and AfDB has 37 active projects or programmes in those countries.[7] Furthermore, geographical coverage of both MDBs would allow GCF to reach most vulnerable communities in 37 fragile and conflict-affected areas. As demonstrated in table 3 below, the proposed extension of the fast-track accreditation programme would allow national applicants from most, if not all, of the 105 countries to benefit from fast-track accreditation, subject to meeting the criteria to be developed in accordance with the process described below.

[5] International Bank for Reconstruction and Development and International Development Association (together as World Bank) was accredited by GCF Board in decision B.10/06, without accreditation conditions.
[6] AfDB was accredited by the GCF Board in decision B.12/30, with accreditation conditions related to the GCF specialized fiduciary standard for on-lending and/or blending. The gap related to oversight of private sector operations, specifically private equity. The status of the conditions is 'pending' as they are triggered only for an approved project or programme that has equity structure to be invested by GCF and AfDB has not submitted such a project for consideration. The gap addressed by the condition in respect of the specialized fiduciary standard for on-lending and/or blending is not relevant to the screening requirements.
[7] As at 30 April 2025.

Areas of alignment with the screening requirements

31. Analysis of the World Bank and AfDB fiduciary standards and their respective appraisal and due diligence processes shows comparability with the GCF fiduciary standards assessed in the screening requirements and the RAF. In particular, the fiduciary standards and due diligence requirements and processes with respect to corporate governance and internal control, financial management, procurement, project management (except for the requirement to provide information on how the applicant will contribute to the mandate of GCF), and on-lending and/or blending (if applicable) are found to be comparable with the GCF screening requirements and the fiduciary standards assessed thereunder.

Areas of divergence from the screening requirements

32. While the analysis of the World Bank and AfDB fiduciary standards and their respective appraisal and due diligence processes revealed strong focuses on integrity, certain gaps and limitations were identified, including in the approach to AML/CFT and know-your-customer policies and procedures.

33. Significant areas of divergence were identified regarding the approach to environmental and social management systems, stakeholder engagement and gender. While GCF focuses on the institutional fit of the applicant, the project- or programme-based due diligence used by MDBs included into analysis does not provide the necessary alignment with the relevant GCF requirements. The World Bank and AfDB apply internationally accepted environmental and social standards, but the GCF accreditation review emphasizes the applicant's ability to develop projects or programme and necessary systems and provide oversight of implementation, not just the applicant's capacity to implement these principles on a project or programme basis.

34. For the avoidance of doubt, the policies and standards of the World Bank and AfDB are not comparable to relevant GCF fiduciary standards and environmental and social standards assessed as part of the screening requirements in respect of: (a) integrity matters, including AML/CFT, policies relating to prohibited practices, and the protection of whistle-blowers and witnesses, and (b) environmental and social standards, including the GCF Indigenous Peoples Policy and updated Gender Policy.

Verification of an applicant's ability to qualify for fast-track accreditation

35. Given that World Bank and AfDB screening and due diligence are project based, and because of the range and nature of the projects financed by these institutions, it will be necessary for GCF to verify that applicants have been subject to the appropriate due diligence processes and have met the relevant fiduciary standards before confirming that they are able to qualify for fast-track accreditation.

36. The process to verify an applicant's ability to qualify for fast-track accreditation based on having been subject to World Bank or AfDB due diligence processes will be developed by the Secretariat as part of the operationalization of the RAF. The criteria that may be applicable include:

(a) **Type of projects.** The only area of World Bank operations that will enable applicants to qualify for fast-track accreditation is Investment Project Financing to partners and sponsors. Applicants that have received funding under World Bank Development Policy Operations will not qualify for GCF fast-track accreditation as they combine funding and technical assistance to member country governments;

(b) **Size and duration of financing.** Both the World Bank and AfDB provide a broad range of financial products, varying in size and duration. The GCF criteria will establish the minimum financing amount and minimum project duration that would enable an applicant to qualify for fast-track accreditation; and

(c) **Nature of the partnership.** The existence of multiple projects could indicate good standing of the applicant with the World Bank or AfDB, as applicable, and likely continued compliance with due diligence requirements. Further consideration of the standing of the applicant with the relevant institution and progress of approved projects, including compliance with legal obligations and any conditions, will be relevant for establishing an applicant's ability to qualify for fast-track accreditation.

37. In addition to the criteria in paragraph 36, the information and evidence assessed during the due diligence process must still be relevant and up to date. If recent portfolio or evaluation reports are submitted to GCF and in form and substance are satisfactory to GCF, then diligence completed up to five years prior to the date of the pre-screening will be acceptable. Otherwise, diligence completed up to three years prior to the date of the accreditation application will be considered.

38. It is envisaged that applicants which qualify for the fast-track accreditation programme due to their receipt of funding from the World Bank or AfDB would be identified during pre-screening and therefore prior to the submission of the application for accreditation.

Recommended scope of the GCF screening criteria for fast-tracking in respect of entities receiving funding from the World Bank and AfDB

39. Based on the gap analysis described above, the Secretariat proposes that, subject to the verification referred to above, the following GCF screening requirements are considered to be met by applicants receiving funding from the World Bank or AfDB:

(a) **Corporate governance and internal control.** The applicant ensures that corporate governance arrangements and actors are in place with roles and responsibilities defined and is able to demonstrate a track record of effective and efficient organizational management in line with its mission and objectives;

(b) **Financial management.** The applicant ensures that financial inputs and outputs are properly accounted for, reported and administered transparently in accordance with pertinent regulations and laws, and with the capacity for international transactions;

(c) **Procurement.** The applicant ensures that procurement practices follow formal standards, guidelines and systems based on widely recognized processes, with specific guidelines for different procurement types, while promoting economy, efficiency and accountability;

(d) **Project management.** The applicant is able to identify, formulate and appraise projects or programmes within the respective jurisdiction (subnational, national, regional or international, as applicable), including capabilities to examine and incorporate technical, financial, environmental, socioeconomic and legal aspects at the appraisal stage, and is guided by appropriate fiduciary oversight procedures; and

(e) **On-lending/blending** (where applicable). The applicant has (i) appropriate registration or licensing from relevant oversight bodies, and (ii) can demonstrate a track record, institutional experience and existing arrangements and capacities for on-lending/blending.

2.3.3. Fast-track accreditation programme under the revised accreditation framework

40. An applicant must meet all GCF screening requirements in order to be recommended to the Board for accreditation, whether it is under the accreditation process or the fast-track accreditation programme.

41. The fast-track accreditation programme is understood to be a part of the accreditation process. If the fiduciary principles and standards and/or due diligence processes of other funds or institutions match the GCF screening requirements, the accreditation review will be shortened due to there being no further review for those matching standards. However, if there are gaps between the standards of other funds or institutions and the GCF requirements, the applicant will be assessed as to whether it adequately meets the relevant screening requirement, and the relevant fiduciary standard and ESS assessed thereunder.

42. When assessing applicants under the fast-track accreditation programme, the AP shall identify, with the support of the Secretariat, the extent to which the fiduciary standards of the relevant institution are comparable to those of GCF and where gaps may exist; rely on the assessment of the relevant institution with respect to the fiduciary standards that are comparable to those of GCF when accrediting an entity to GCF; assess whether the applicant adequately meets the GCF fiduciary standards where there are gaps; and recommend to the Board whether an applicant entity shall be granted accreditation.

43. Qualification for the fast-track accreditation programme does not mean automatic accreditation. All applicants must meet all the screening requirements and be accredited by a decision of the GCF Board to become accredited by GCF.

III. Impact assessment and implementation arrangements

44. The proposed extension of the fast-track accreditation programme would allow GCF to improve speed and efficiency, simplify the accreditation process, achieve complementarity and coherence, and reduce the administrative burden for applicants that have already been subject to and successfully cleared a review process equivalent to the assessment of the relevant GCF screening requirements.

45. This improved efficiency is anticipated to increase the number and diversity of organizations able to be accredited in an expedited manner, particularly DAEs, which will contribute to a broader and more rapid delivery of climate finance.

46. The RAF aims to streamline the accreditation process, and this effort would be supported by an extension of the fast-track accreditation programme. The Secretariat, in consultation with the AP, will continue to identify other entities applying fiduciary and environmental and social principles or standards found to be comparable with the GCF fiduciary standards and ESS, and will continue to propose to the Board that the fast-track accreditation programme be extended in respect of those entities.

47. The Secretariat will develop detailed criteria, track record validation protocols, customized fast-track programme templates and service standards as part of RAF operationalization and make these publicly available, as foreseen in the RAF implementation arrangements (contained in this document).

48. The Secretariat will apply the extended fast-track procedures set out in section 2.3 above to assess applicants against the screening requirements under the RAF.

IV. Budgetary implications

49. Resource implications for the extension of the fast-track accreditation programme would include short-term staff costs to develop underlying tools and templates.

50. Efficiency gains are expected to result from fully operationalizing the extended fast-track accreditation programme due to the avoidance of duplicative and redundant efforts during the accreditation review process.

51. Both efficiency gains and resource implications will be accounted for as part of the RAF implementation plan.

V. Research and consultation

52. In developing the extension of the fast-track accreditation programme, the Secretariat drew upon operational experience and lessons learned from implementation of the accreditation process and the fast-track accreditation process adopted in decision B.08/03, feedback from entities and reviewers, and formal reviews such as the Independent Evaluation Unit-conducted review focusing on accreditation[8] and access[9].

53. The proposal to extend the fast-track accreditation programme to the World Bank and AfDB was developed in consultation with the AP and discussed with the proposed institutions.

VI. Monitoring and review

54. The implementation of the extension of the fast-track accreditation programme will be monitored and reviewed as part of the implementation of the RAF.

[8] https://ieu.greenclimate.fund/evaluation/accred2020
[9] https://ieu.greenclimate.fund/document/access-synthesis-2024

Table 1: Gap analysis of the relevant standards of the Global Environment Facility, Adaptation Fund and Directorate-General for International Partnerships and the GCF screening requirements (and fiduciary standards assessed thereunder)

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant GEF standard[a]	Relevant AF standard[b]	Relevant DG INTPA standard[c]

Corporate governance and internal control
 	
The applicant ensures that corporate governance arrangements and actors are in place with roles and responsibilities defined and is able to demonstrate a track record of effective and efficient organizational management in line with its mission and objectives.
	Initial basic fiduciary standards
	
	Section 1.1 Key administrative and financial capacities
	- Subsection 1.1.1 General management and administrative capacities
	  ○ All items (2 (a–e))
	- Subsection 1.1.3 Internal and external audit
	  ○ A. Independent audit committee
	    ▪ All items (3–4)
	  ○ B. Internal audit
	    ▪ All items (5 (a–i))
	  ○ C. External audit
	    ▪ All items (6 (a–e))
	- Subsection 1.1.4 Control framework
	  ○ All items (7 (a–k))
		Yes	Yes	Yes

Financial management The applicant ensures that financial inputs and outputs are properly accounted for, reported and administered transparently in accordance with pertinent regulations and laws, and with the capacity for international transactions.	**Initial basic fiduciary standards** Section 1.1 Key administrative and financial capacities - Subsection 1.1.2 Financial management and accounting ○ Items a–e	Yes	Yes	Yes

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant GEF standard[a]	Relevant AF standard[b]	Relevant DG INTPA standard[c]
Procurement The applicant ensures that procurement practices follow formal standards, guidelines and systems based on widely recognized processes, with specific guidelines for different procurement types, while promoting economy, efficiency and accountability.	**Initial basic fiduciary standards** Section 1.1 Key administrative and financial capacities - Subsection 1.1.5 Procurement ○ Items 8 (a–b)	Yes	Yes	Yes

Integrity
 	
The applicant defines and adheres to ethical standards that promote full transparency and accountability, to be upheld by employees and those contracted or functionally related to the organization.
 	
The applicant is committed, as an organization, to maintaining the highest levels of integrity/accountability and to preventing and combating prohibited practices in the implementation of funded projects.
 	
The applicant is committed to protecting whistle-blowers, providing publicly accessible
	Initial basic fiduciary standards
	
	• Section 1.2 Transparency and accountability
	- Subsection 1.2.1 Code of ethics
	  ○ All Items (a–c)
	- Subsection 1.2.3 Capacity to prevent or deal with financial mismanagement and other forms of malpractice
	  ○ All items (a–e)
	- Subsection 1.2.4 Investigation function
	  ○ All items (11 (a–d))
	- Subsection 1.2.5 Anti-money-laundering and anti-terrorist financing
	  ○ The entire standard covered
	
	• Basic capacity needed to fulfil counterparty obligations under the Policy on Prohibited Practices, AML/CFT Policy and standards, and Policy on the Protection of Whistleblowers and Witnesses
		Yes, with the exception of subsection 1.2.5 Anti-money laundering and anti-terrorist financing	Yes, with the exception of subsection 1.2.4 Investigation function	Yes, with the exception of subsection 1.2.5 Anti-money laundering and anti-terrorist financing

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant GEF standard[a]	Relevant AF standard[b]	Relevant DG INTPA standard[c]
avenues for confidential reporting of allegations, and it has, or commits to rely on, an objective investigation function that can capably and professionally investigate allegations of prohibited practices in Fund-related activity. The applicant has capacity and processes to conduct due diligence of prohibited practices (which may include screening against financial sanctions of the United Nations Security Council) on potential or existing counterparties with which it engages, including executing entities, implementing entities, or any other entity or person involved in project implementation, and to maintain/retain relevant records. If applicable, the applicant has processes (i) to have a person responsible for integrity risk management matters that also may include inter alia AML/CFT; (ii) to identify and mitigate compliance risks following a risk-based approach; (iii) to	• GCF standards on the AML/CFT Policy are under development (decision B.23/15).			

GCF screening requirement	**GCF relevant fiduciary standard(s) or policy**	**Relevant GEF standard**[a]	**Relevant AF standard**[b]	**Relevant DG INTPA standard**[c]
monitor counterparty relationships and activities; and (iv) to provide training and advice on integrity risk matters.				
Project management The applicant is able to identify, formulate and appraise projects or programmes within the respective jurisdiction (subnational, national, regional or international, as applicable), including capabilities to examine and incorporate technical, financial, environmental, socioeconomic and legal aspects at the appraisal stage, and is guided by appropriate fiduciary oversight procedures. The applicant provides information on how it will contribute to the mandate of the Fund (e.g. policy or strategy on climate change/green growth/paradigm shift in place).	**Initial specialized fiduciary standards** • Section 2.1 Project management - Subsection 2.1.1 Project preparation and appraisal ○ All items (11 (a–d)) • Requirements of decision B.10/06, paragraph (j)	Yes, with the exception of the requirements of decision B.10/06, paragraph (j)	Yes, with the exception of the requirements of decision B.10/06, paragraph (j)	No
On-lending/blending (if applicable) The applicant (i) has appropriate registration or licensing from relevant oversight bodies and (ii)	**Initial specialized fiduciary standards** Section 2.3 On-lending and/or blending - Item 16 (a); part of 16 (b), which is a requirement on an applicant's track record	n/a	n/a	n/a

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant GEF standard[a]	Relevant AF standard[b]	Relevant DG INTPA standard[c]
can demonstrate a track record, institutional experience, and existing arrangements and capacities for on-lending and/or blending.				

Note: The GCF initial fiduciary principles and standards (basic and specialized) are found in annex II to decision B.07/02 (annex II to document GCF/B.07/11).
Abbreviations: AF = Adaptation Fund, AML/CFT = anti-money-laundering and countering the financing of terrorism, DG INTPA = Directorate-General for International Partnerships, GEF = Global Environment Facility, n/a = not applicable.

[a] *Policy on Minimum Fiduciary Standards*. Available at www.thegef.org/documents/fiduciary-standards.

[b] *Annex 2: Fiduciary Risk Management Standards to Be Met by Implementing Entities*. Available at www.adaptation-fund.org/wp-content/uploads/2015/01/OPG%20ANNEX%202.pdf.

[c] *Commission Decision of 17 April 2019 on Establishing New Terms of Reference for the Pillar Assessment Methodology to Be Used Under Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council.* Available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019D0606(01).

Table 2. Gap analysis of the relevant standards of the World Bank and African Development Bank and GCF screening requirements (and fiduciary standards assessed thereunder)

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant World Bank standard[a]	Relevant AfDB standard[b]

Corporate governance and internal control
 	
The applicant ensures that corporate governance arrangements and actors are in place with roles and responsibilities defined and is able to demonstrate a track record of effective and efficient organizational management in line with its mission and objectives.
	Initial basic fiduciary standards
	
	Section 1.1 Key administrative and financial capacities
	- Subsection 1.1.1 General management and administrative capacities
	  ○ All items (2 (a–e))
	- Subsection 1.1.3 Internal and external audit
	  ○ A. Independent audit committee
	    ▪ All items (3–4)
	  ○ B. Internal audit
	    ▪ All items (5 (a–i))
	  ○ C. External audit
	    ▪ All items (6 (a–e))
	- Subsection 1.1.4 Control framework
	  ○ All items (7 (a–k))
		Yes
		
		All key administrative and financial capacities are assessed in depth during project or partner due diligence. For all entities handling World Bank financing (such as governmental organizations, non-governmental organizations or financial institutions), a detailed due diligence assessment is done.
			Yes (sections 5.1 and 5.2 of the AfDB guidelines)
			
			AfDB requires entities to possess general management and administrative capacities to ensure effective project implementation and financial management.[c]

Financial management The applicant ensures that financial inputs and outputs are properly accounted for, reported and administered transparently in accordance with pertinent regulations and laws, and with the capacity for international transactions.	**Initial basic fiduciary standards** Section 1.1 Key administrative and financial capacities - Subsection 1.1.2 Financial management and accounting ○ Items a–e	Yes Borrowers and recipients of World Bank funding are required to demonstrate sound financial management and accounting and reporting, with a properly staffed	Yes (sections 3.3.2, 3.3.6, 5.1.1, 5.1.2, 5.1.3, 5.2.1, 5.2.2 and 5.2.3 of the AfDB guidelines) The entity must have a well-developed budgeting system that includes detailed cost estimates, comprehensive budgets

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant World Bank standard[a]	Relevant AfDB standard[b]
		and qualified financial management team.	and procedures for monitoring expenditure against budget. AfDB requires an accounting system that allows for proper recording of financial transactions, including allocation of expenditure in accordance with project components.[d]
Procurement The applicant ensures that procurement practices follow formal standards, guidelines and systems based on widely recognized processes, with specific guidelines for different procurement types, while promoting economy, efficiency and accountability.	**Initial basic fiduciary standards** Section 1.1 Key administrative and financial capacities - Subsection 1.1.5 Procurement ○ Items 8 (a–b)	Yes Borrowers and recipients of World Bank funding are required to demonstrate the use of formal procurement practices that follow World Bank procurement guidelines, with a properly staffed qualified procurement team.	Yes (sections 5.2.1 and 5.2.5 of the AfDB guidelines) AfDB ensures that the recruitment of auditors and other key staff follows the agreed procurement policy. AfDB ensures that all procurement-related documentation, including audit reports and management letters, is complete and compliant with the requirements.[e]
Integrity The applicant defines and adheres to ethical standards that promote full transparency and accountability, to be upheld by employees and those contracted or functionally related to the organization.	**Initial basic fiduciary standards** • Section 1.2 Transparency and accountability - Subsection 1.2.1 Code of ethics ○ All Items (a–c) - Subsection 1.2.3 Capacity to prevent or deal with financial	Partially covered: accreditation gap The integrity of partners is fundamental to projects funded by the World Bank. Due diligence typically includes checks on the prevention and combating	Partially covered: accreditation gap (see sections 3.3.6, 5.1.1, 5.1.2 and 5.2.2 of the AfDB guidelines) AfDB assesses transparent and fair recruitment processes. AfDB will

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant World Bank standard[a]	Relevant AfDB standard[b]
The applicant is committed, as an organization, to maintaining the highest levels of integrity/accountability and to preventing and combating prohibited practices in the implementation of funded projects. The applicant is committed to protecting whistle-blowers, providing publicly accessible avenues for confidential reporting of allegations, and it has, or commits to rely on, an objective investigation function that can capably and professionally investigate allegations of prohibited practices in Fund-related activity. The applicant has capacity and processes to conduct due diligence of prohibited practices (which may include screening against financial sanctions of the United Nations Security Council) on potential or existing counterparties with which it engages, including executing entities, implementing entities, or any other entity or person involved in project implementation, and to maintain/retain relevant records. If applicable, the applicant has processes (i) to have a person	mismanagement and other forms of malpractice ○ All items (a–e) - Subsection 1.2.4 Investigation function ○ All items (11 (a–d)) - Subsection 1.2.5 Anti-money-laundering and anti-terrorist financing ○ The entire standard covered • Basic capacity needed to fulfil counterparty obligations under the Policy on Prohibited Practices, AML/CFT Policy and standards, and Policy on the Protection of Whistleblowers and Witnesses • GCF standards on the AML/CFT policy is under development (decision B.23/15)	of prohibited practices, financial mismanagement, and anti-corruption practices. Potential partners are screened against United Nations and international sanctions lists. However, the nature and extent of World Bank screening might depend on the nature of the project or partner.	evaluate the existence of a code of ethics specifically addressing fraud and corrupt practices. This includes an assessment to prevent and detect fraud, corruption, waste and misuse of resources. AfDB evaluates the internal control environment and assesses whether it enables the entity to prevent fraud and corruption. AfDB performs a fiduciary risk analysis to assess risks posed by weaknesses in financial management and systems. Additionally, the AfDB guidelines emphasize the need for risk assessment and management, including for risks related to fraud and corruption. They also require entities to have procedures in place to report suspected fraud, corruption, waste and misuse of resources.

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant World Bank standard[a]	Relevant AfDB standard[b]
responsible for integrity risk management matters that also may include inter alia AML/CFT; (ii) to identify and mitigate compliance risks following a risk-based approach; (iii) to monitor counterparty relationships and activities; and (iv) to provide training and advice on integrity risk matters.			AfDB has a division whose mandate is to continually examine corruption issues and AfDB has various policies on ethics, anti-corruption, money laundering and whistle-blowing. However, the nature and extent of AfDB screening might depend on the nature of the project or partner.
Project management The applicant is able to identify, formulate and appraise projects or programmes within the respective jurisdiction (subnational, national, regional or international, as applicable), including capabilities to examine and incorporate technical, financial, environmental, socioeconomic and legal aspects at the appraisal stage, and is guided by appropriate fiduciary oversight procedures. The applicant provides information on how it will contribute to the mandate of the Fund (e.g. policy or strategy on climate change/green growth/paradigm shift in place).	**Initial specialized fiduciary standards** • Section 2.1 Project management - Subsection 2.1.1 Project preparation and appraisal ○ All items (11 (a–d)) • Requirements of decision B.10/06, paragraph (j)	Yes, with the exception of the requirements of decision B.10/06, paragraph (j) Borrowers and recipients of World Bank project finance undergo a detailed assessment looking at all aspects of project management during the project appraisal.	Yes, with the exception of the requirements of decision B.10/06, paragraph (j) Annex 5.1 (assessment questionnaire) in the AfDB guidelines contains questions on reporting and monitoring features built into the borrowers' systems to track the use of project proceeds by downstream partners (communities or non-governmental organizations).[f]

GCF screening requirement	GCF relevant fiduciary standard(s) or policy	Relevant World Bank standard[a]	Relevant AfDB standard[b]
On-lending/blending (if applicable) The applicant has (i) appropriate registration or licensing from relevant oversight bodies, and (ii) can demonstrate a track record, institutional experience and existing arrangements and capacities for on-lending/blending.	**Initial specialized fiduciary standards** Section 2.3 On-lending and/or blending - Item 16 (a); part of 16 (b), which is a requirement on an applicant's track record	Yes Financial institutions and intermediaries are assessed for their on-lending capabilities.	Yes (sections 3.4, 4.2, 4.4, 5.1, 5.1.3 and 5.2 of the AfDB guidelines) The guidelines apply to all AfDB investment lending operations in the public sector and grants. Private sector operations (private financial intermediaries) and some related due diligence procedures are outlined in the AfDB policy on non-sovereign operations and the associated guidelines (not publicly available).[g]

Note: The GCF initial fiduciary principles and standards (basic and specialized) are found in annex II to decision B.07/02 (annex II to document GCF/B.07/11).

Abbreviations: AfDB = African Development Bank, AML/CFT = anti-money-laundering and countering the financing of terrorism.

[a] *Bank Policy: Investment Project Financing*. Available at https://thedocs.worldbank.org/en/doc/6da2e812c0b8e84a1a614bb3c0507e5a-0290012023/original/Bank-Policy-Investment-project-financing.pdf; *Bank Directive: Investment Project Financing*. Available at https://thedocs.worldbank.org/en/doc/a63d7e40de1c13802a096eddf6d105bb-0290012023/original/Bank-Directive-Investment-project-financing.pdf.

[b] *Financial Management Guidelines for Investment Operations*. Available at www.afdb.org/en/projects-and-operations/financial-management/financial-management-policies-procedures/guidelines-and-financial-analysis-of-projects; *Policy on Non-sovereign Operations*. Available at www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/NSO_Policy-En.pdf.

[c] AfDB mandates an organizational structure that is appropriate for the needs of the project and that has robust internal control systems, including policies and procedures. AfDB advocates for the establishment of a project management or coordination unit in all of its programmes and projects. The internal audit function is evaluated for its effectiveness, qualifications and reporting structure. The internal and external audit functions must maintain a regular, constructive dialogue on all aspects of audit planning, coverage and areas of concern, while seeking to avoid duplication of effort. The AfDB guidelines emphasize the importance of regular external audits by independent auditors to ensure the integrity of financial statements and compliance with applicable standards. While AfDB does not explicitly state that an independent audit committee is required for applicant entities, it emphasizes the importance of robust internal control systems, including internal audit

functions and external audit arrangements. AfDB offers technical guidance to ensure that the partner is able to meet and undertake financial assessment reporting as required.

[d] This system should be supported by documented accounting policies and procedures, adequate staffing, and a proper classification system. The AfDB guidelines require information systems around financial management.

[e] AfDB identifies and mitigates procurement-related risks through fiduciary risk analysis and implements necessary measures. AfDB conducts on-site supervision and transaction reviews to ensure ongoing compliance with procurement policies and procedures. AfDB is required to follow the corporate procurement rules in all the funded implementation programmes and projects.

[f] Chapter 4 of the AfDB *Guidelines for Financial Management and Financial Analysis of Projects* (available at www.afdb.org/fileadmin/uploads/afdb/Documents/Procurement/Project-related-Procurement/GFA01_Guidelines%20for%20FG%20%26%20FA%20of%20Proj.pdf) emphasize the need for borrowers to have a sound system of financial monitoring and evaluation. It includes guidelines on the development and implementation of policies and procedures to ensure effective project management but does not define requirements for pre-existing systems. *Evaluation Guidelines and Tools* (available at www.afdb.org/en/documents/category/evaluation-guidelines-and-tools) provides detailed instructions on AfDB evaluation processes, including the establishment of performance indicators and monitoring techniques. Section 5.3 of *Policy on Non-sovereign Operations* (see note b above) provides requirements for the identification of development results. AfDB has a robust framework for results management and monitoring. In every project, the implementation unit is required to include a monitoring and evaluation specialist to ensure that the project aligns with the bank's overall results framework.

[g] A financial management assessment is conducted at the institutional level to ensure that the entity's budgeting, accounting, internal control, treasury, financial reporting, and external auditing arrangements are sound enough to manage funds (potentially from multiple sources) efficiently and economically. The capacity of the implementing entity to manage funds and identify any significant fiduciary risks is assessed. The guidelines discuss the management of disbursements from AfDB and ensuring timely availability of counterpart funds. This includes systems to ensure timely payments to suppliers and contractors. The guidelines stress the importance of identifying and managing risks associated with blending. This include assessing the financial viability of the project, the reliability of co-financiers and the potential impact of external factors on project implementation.

Table 3. Geographical coverage of recipients of World Bank and African Development Bank financing[a]

Country	World Bank	AfDB	Country	World Bank	AfDB	Country	World Bank	AfDB
Afghanistan	●	n/a	Guatemala	●	n/a	**Papua New Guinea**	●	n/a
Albania	●	n/a	Guinea	●	●	Paraguay	●	n/a
Algeria	◎	●	**Guinea-Bissau**	●	●	Qatar	◎	n/a
Andorra	n/a	n/a	Guyana	●	n/a	Republic of Moldova (the)	●	n/a
Angola	●	●	**Haiti**	●	n/a	Saint Kitts and Nevis	◎	n/a
Azerbaijan	●	n/a	Honduras	●	n/a	Saint Lucia	●	n/a
Bahamas (the)	◎	n/a	Iran (Islamic Republic of)	●	n/a	Saint Vincent and the Grenadines	●	n/a
Bahrain	◎	n/a	**Iraq**	●	n/a	Samoa	●	n/a
Barbados	●	n/a	Israel	◎	n/a	San Marino	◎	n/a
Bosnia and Herzegovina	●	n/a	Kazakhstan	●	n/a	**Sao Tome and Principe**	●	●
Botswana	●	●	**Kiribati**	●	n/a	Saudi Arabia	◎	n/a
Brunei Darussalam	n/a	n/a	Kuwait	◎	n/a	Serbia	●	n/a
Burundi	●	●	Lao People's Democratic Republic (the)	●	n/a	Seychelles	●	●
Cabo Verde	●	●	**Lebanon**	●	n/a	Sierra Leone	●	●
Cameroon	●	●	Lesotho	●	●	Singapore	◎	n/a
Central African Republic (the)	●	●	Liberia	●	●	**Solomon Islands**	●	n/a
Chad	●	●	**Libya**	◎	●	Somalia	●	●
Comoros (the)	●	●	Madagascar	●	●	South Sudan	●	●
Congo (the)	●	●	Malawi	●	●	**State of Palestine (the)**	n/a	n/a
Costa Rica	●	n/a	Malaysia	◎	n/a	Sudan (the)	●	●
Cuba	n/a	n/a	Maldives	●	n/a	Suriname	●	n/a

Country	World Bank	AfDB	Country	World Bank	AfDB	Country	World Bank	AfDB
Democratic People's Republic of Korea (the)	n/a	n/a	**Marshall Islands (the)**	●	n/a	Syrian Arab Republic (the)	◎	n/a
Democratic Republic of the Congo (the)	●	●	Mauritania	●	●	Thailand	●	n/a
Djibouti	●	●	Mauritius	●	●	**Timor-Leste**	●	n/a
Dominica	●	n/a	Montenegro	●	n/a	Togo	●	●
Dominican Republic (the)	●	n/a	**Mozambique**	●	●	Tonga	●	n/a
Ecuador	●	n/a	**Myanmar**	●	n/a	Trinidad and Tobago	◎	n/a
Egypt	●	●	Nauru	◎	n/a	Tunisia	●	●
El Salvador	●	n/a	Nicaragua	●	n/a	Turkmenistan	◎	n/a
Equatorial Guinea	◎	●	**Niger (the)**	●	●	**Tuvalu**	●	n/a
Eritrea	◎	●	Niue	n/a	n/a	United Arab Emirates (the)	◎	n/a
Eswatini	●	●	North Macedonia	●	n/a	Uzbekistan	●	n/a
Gabon	●	●	Oman	◎	n/a	Vanuatu	●	n/a
Gambia (the)	●	●	Palau	◎	n/a	**Venezuela (Bolivarian Republic of)**	◎	n/a
Grenada	●	n/a	Panama	●	n/a	**Yemen**	●	n/a

Notes: (1) Only countries without a national GCF direct access entity are included; (2) Countries **in bold** are included in the Word Bank's list of fragile and conflict-affected situations. See *FY25 List of Fragile and Conflict-Affected Situations*. Available at https://thedocs.worldbank.org/en/doc/b3c737c4687db176ec98f5c434d0de91-0090082024/original/FCSListFY25.pdf.
Abbreviations: ● = has recent and/or active project(s), ◎ = does not have recent and/or active project(s), AfDB = African Development Bank, n/a = not applicable (not a country of operation).
[a] As at 30 April 2025.

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