



**GREEN
CLIMATE
FUND**

Meeting of the Board

26 – 29 October 2026

Songdo, Incheon, Republic of Korea

Provisional agenda item 8

GCF/B.46/Inf.02

1 October 2026

Report on the activities of the Independent Integrity Unit

Summary

This document contains the Report on the activities of the Independent Integrity Unit for the forty-sixth meeting of the GCF Board with a reporting period of 1 June to 21 September 2026.

I. Overview

1. This report provides an update on key activities of the Independent Integrity Unit (IIU) in implementing its 2026 Work Programme and Budget as approved by the Board¹ during the reporting period of 1 June to 21 September 2026.

II. Key IIU Activities during the Reporting Period

Table 1. Actions Taken Related to Strategic Objective 1

Strategic Objective 1: To foster strong institutional governance and a culture of integrity of the Fund	
2026 Work Programme Item	Actions during the Reporting Period
Support to the EAC and the Board in their oversight of the Fund's operations	Development of the 2027-2029 IIU Work Programme & Budget. IIU presented its draft 2027–2029 Work Programme and Budget to the Ethics and Audit Committee (EAC) at its 125th Meeting on 21 July 2026. After incorporating EAC feedback, the Committee endorsed the proposal. Following the Budget Committee's (BC) 16th Meeting on 18 August 2026 and a written procedure on a no-objection basis, the BC endorsed the proposal on 31 August 2026. Decision Tree on the PECoI. IIU developed a decision tree to support the EAC in its consideration of matters relating to the implementation of the Policies on Ethics and Conflicts of Interest (PECoI), with the aim of facilitating a consistent and structured approach to decision-making.
Advisories and guidance on implementation of and compliance with integrity policies	Advisories on Conflicts of Interest. IIU issued two advisories on Conflicts of Interest to the independent Technical Advisory Panel (iTAP) and Accreditation Panel (AP) members. Review of Legal Agreements. The IIU supported the negotiations of integrity-related clauses of five legal arrangements with International Accredited Entities, including Funded Activity Agreements and Readiness Framework Agreements.
Integrity policy development, implementation, and monitoring	PPP and PPWW Implementation Report. IIU will submit to the Board, for information at B.46, the 2025 Annual Policy Implementation Report on the PPP and PPWW. The report highlights key observations, implementation challenges, and opportunities for improvement, and incorporates feedback from key stakeholders, including the Secretariat and the Ethics and Audit Committee (EAC) of the Board.

¹ As adopted by Board decision B.43/11(a).

Table 2. Actions Taken Related to Strategic Objective 2

Strategic Objective 2: To enhance capacity of GCF partners and be a thought leader in climate finance integrity	
2026 Work Programme Item	Actions during the Reporting Period
Training, technical assistance, and awareness raising for GCF external stakeholders	Regional Accountability Workshop in Central America and the Caribbean. IIU and IRM held this workshop with 20 Direct Access Entities (DAEs) and 10 Civil Society Organisations (CSOs) from Central America and the Caribbean to Panama City from 15-17 September, focusing on supporting DAEs in strengthening integrity in GCF-funded projects and on grievance redress systems.
Knowledge product development	Integrity Toolkit for Direct Access Entities. IIU has begun developing the content for modules 1-3 (out of six) of the Toolkit, in collaboration with a service provider. Integrity e-Learning Module for GCF Personnel. IIU developed the Terms of Reference in collaboration with DPC and OGC for the design of the Module and formally launched the related procurement process.
Building of strategic partnerships and communities of practice	Peer Learning Programme. The Programme concluded in July 2026 with a session on conducting investigations. The 14 participating DAEs also met in Panama City from 17-18 September for a closing workshop.

Table 3. Actions Taken Related to Strategic Objective 3

Strategic Objective 3: To serve as an effective investigation function	
2026 Work Programme Item	Actions during the Reporting Period
Investigations and optimisation of investigative processes	Cases Opened. During the reporting period from 1 June to 21 September 2026, IIU opened 33 new cases, including 16 cases related to GCF projects and programmes (external), 14 misconduct cases (internal), and three classified as other. This brought the total number of cases opened in 2026 thus far to 59 (33 external, 23 internal, and three other). Cases Closed. During the same reporting period, IIU closed 18 cases (nine external, seven internal, and two other). In 2026, IIU closed a total of 33 cases thus far (19 external, 12 internal, and two other). Out of these 33 closed cases, four were substantiated (two external and two internal).

Table 4. Actions Taken Related to Strategic Objective 4

Strategic Objective 4: To proactively identify and manage integrity risks in GCF-Funded Activities/operations	
2026 Work Programme Item	Actions during the Reporting Period
Integrity risk management by means of PIRs and other risk detection mechanisms	Project Implication Advisories. IIU issued one Project Implication Advisory (PIA), aimed to inform the Secretariat of project-related risks for monitoring purposes. Proactive Integrity Reviews (PIRs). IIU advanced PIR-003 as part of its proactive approach to identifying and managing integrity risks in GCF-funded activities. The review focused on strengthening prevention, detection, and oversight controls, and provided recommendations to support more effective project implementation. Implementation of some recommendations has already started, and IIU will share the report with the Secretariat to support follow-up, enhance policy implementation, and strengthen oversight of relevant project risks.
Innovation and data-driven risk assessment	Project Integrity Reviews (PIRs). IIU, in collaboration with the DIT in the Secretariat, is enhancing its Project Integrity Risk Scoring Tool used in the PIR project selection process to support a more risk-based approach to selecting projects for the PIRs.

Annex I: Investigations

Table 5. All Opened and Closed Cases (including respective years of closure)

Year Received	Cases Opened	Year Closed					# of Open Cases
		2022	2023	2024	2025	2026	
2022	31	14	11	4	2		-
2023	32		15	10	4	2	1
2024	49			19	17*	5	10*
2025	45				8	9	28
2026	59					17	42
Total	216	14	26	33	31	33	81

* One 2024 case was reopened and closed in 2025.

** One 2024 case was reopened in 2025.

Table 6. Opened and Closed External Cases (including respective years of closure)

Year Received	Cases Opened	Year Closed					# of Open Cases
		2022	2023	2024	2025	2026	
2022	13	4	5	2	2		-
2023	15		5	5	3	2	-
2024	19			7	10	1	1
2025	23				4	6	13
2026	33					10	23
Total	103	4	10	14	19	19	37

Table 7. Opened and Closed Internal Cases (including respective years of closure)

Year Received	Cases Opened	Year Closed					# of Open Cases
		2022	2023	2024	2025	2026	
2022	17	9	6	2			-
2023	16		9	5	1	0	1
2024	29			11	7*	4	9**
2025	21				3	3	15
2026	23					5	18
Total	106	9	15	18	11	12	43

* One 2024 case was reopened and closed in 2025.

** One 2024 case was reopened in 2025.

Table 8. Count of Cases Opened by Type

Type of Cases	2022	2023	2024	2025	2026
External	13	15	19	23	33
Abuse	2	2	5	3	7
Collusion	-	1	-	1	1
Conflict of Interest	3	-	-	2	2
Corruption	1	2	2	2	6
Fraud	1	5	4	7	4
Obstructive Practice	-	-	1	-	-



Type of Cases	2022	2023	2024	2025	2026
SEAH	1	1	1	1	1
Other Project-Related Reports	5	4	6	7	12
Internal	17	16	29	21	23
Abuse	1	1	-	2	2
Abuse of Authority	6	6	3	7	8
Collusion	1	-	1	-	-
Conflict of Interest	-	-	8	1	1
Corruption	-	1	1	-	-
Fraud	1	1	1	-	2
Harassment	3	5	9	7	6
ML/TF	-	-	-	1	-
Retaliation against Whistleblowers and Witnesses	-	-	1	-	-
SEAH	-	2	-	-	-
Other Misconduct	5	-	5	3	4
Non-Integrity Violation	-	1	1	1	3
Other	1	-	-	-	-
TOTAL	31	32	49	45	59

Table 9. Count of Cases Closed by Type

Type of Cases	2022	2023	2024	2025	2026
External	6	13	14	19	19
Abuse	-	3	2	5	2
Collusion	-	1	-	1	-
Conflict of Interest	1	1	1	1	-
Corruption	1	2	2	-	2
Fraud	-	2	2	6	2
Obstructive Practice	-	-	1	-	-
SEAH	1	1	1	-	1
Other Project-Related Reports	3	3	5	6	12
Internal	15	17	18	11	12
Abuse	1	-	-	-	1
Abuse of Authority	4	6	3	3	3
Collusion	-	-	1	-	-
Conflict of Interest	3	-	1	2	2
Corruption	-	1	-	-	-
Fraud	2	1	1	1	-
Harassment	2	6	9	2	1
ML/TF	-	-	-	1	-
Retaliation against Whistleblowers and Witnesses	-	-	-	-	1
SEAH	-	1	1	-	-
Other Misconduct	3	2	2	2	4
Non-Integrity Violation	1	1	1	1	2
Other	1	-	-	-	-
TOTAL	23	31	33	31	33

Annex II: List of Outreach and Capacity-Building Events

Table 10. Outreach and Engagement Activities from 1 June to 21 September 2026

Type of Event	Event Title	Date	Audience
In-Person Meeting	Onboarding Session for GCF Liaison Officers	4 June	GCF Liaison Officers
Virtual Workshop	Peer Learning Programme Meeting: Peer-Led Workshop on Integrity Due Diligence in La Banque Agricole and Nepal Investment Mega Bank	25 June	Direct Access Entities
Virtual Meeting	Introduction of the Independent Units to New Accredited Entities at B.44	8 July	Accredited Entities
Virtual Workshop	Peer Learning Programme Training on Conducting Investigations	29 July	Direct Access Entities
In-Person Workshop	2026 GCF Regional Accountability Workshop for Central America and the Caribbean	15-17 September	Direct Access Entities and Civil Society Organisations
In-Person Workshop	Peer Learning Programme Closing Workshop	17-18 September	Direct Access Entities