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Consideration of accreditation proposals and activities – Addendum XI

Accreditation assessment of APL192

Summary

This document contains the recommendation by the Accreditation Panel for accreditation of applicant 192 (APL192), International Organization for Migration (IOM), based in Switzerland, in accordance with the revised accreditation framework adopted in paragraph (a) of decision B.42/13, and includes the screening report confirming the applicant meets the screening requirements contained in part 1 of annex II to document GCF/B.42/04/Add.01.

I. Introduction

1. The International Organization for Migration (IOM) is an intergovernmental organization and United Nations related organization based in Geneva, Switzerland. Established in 1951, IOM is dedicated to promoting humane and orderly migration for the benefit of all. Its primary missions are to assist in meeting the operational challenges of migration, advance understanding of migration issues, encourage social and economic development through migration, and uphold the human dignity and well-being of migrants.

2. The applicant applied and was assessed in accordance with the revised accreditation framework (adopted in decision B.42/13, paragraph (a)). The applicant is eligible for, and applied under, the fast-track accreditation process (adopted in decision B.08/03, paragraphs (c)–(h)), as an entity pillar-assessed by the European Union Directorate-General for International Partnerships (EU DG INTPA). As per decision B.42/13, paragraph (i), the IOM application has been assessed by the Accreditation Panel (AP) against the relevant screening requirements as contained in table 1 of annex III to document GCF/B.42/04/Add.01.¹ As part of this assessment, the AP consulted the applicant's website and third-party websites to complement the information provided in the application. The AP's assessment was concluded with the issuance of a screening report to the applicant, as contained in Section III below.

3. The applicant has applied to be accredited for the following parameters under the GCF fit-for-purpose approach:²

- (a) **Access modality:** international;
- (b) **Track:** fast track; and
- (c) **Maximum environmental and social risk category:** medium risk (category B/intermediation 2 (B/I-2)).³

II. Contribution to GCF mandate and strategic goals

4. The applicant is found to have the potential to support GCF in implementing its Strategic Plan for 2024–2027 with respect to:

- (a) The indicative projects and programmes that the applicant intends to submit to GCF;
- (b) Alignment of said indicative pipeline with country programming priorities;
- (c) Potential contribution to the adaptation and mitigation balance in the GCF portfolio, as the applicant focuses primarily on adaptation and cross-cutting activities targeting vulnerable populations, contributing to GCF results areas including most vulnerable people and communities; health, food and water security; infrastructure and the built environment; and ecosystems and ecosystem services, while integrating low-emission co-benefits; and
- (d) Mobilizing climate finance at scale, as the applicant has demonstrated a programming track record managing a climate change-related portfolio of approximately USD 2.8

¹ See <https://www.greenclimate.fund/board-document/gcf-b42-04-add01>

² Refer to section IV below for the recommendations by the Accreditation Panel.

³ As per the revised Environmental and Social Policy, adopted in decision B.BM-2021/18, category B is defined as “Activities with potential limited adverse environmental and/or social risks and impacts that individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures” and intermediation 2 is defined as “When an intermediary's existing or proposed portfolio includes, or is expected to include, substantial financial exposure to activities with potential limited adverse environmental or social risks and impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures; and includes no activities with potential significant adverse environmental and social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented.”

billion across more than 1,100 projects, with individual grant-funded programmes of up to USD 123–150 million.

5. IOM is a member of the United Nations system and a highly decentralized organization with its headquarters located in Geneva, Switzerland; two administrative centres in Panama and the Philippines; nine regional offices; and a special liaison office in Addis Ababa, Ethiopia. The organization has 175 Member States and 8 observer States, maintaining an institutional presence in 172 countries with 557 field offices globally. To support its expanding global portfolio, IOM engages an estimated 15,119 staff members and 5,928 non-staff personnel. This extensive network is integrated into United Nations country teams worldwide, allowing IOM to coordinate major efforts, such as co-leading the global Camp Coordination and Camp Management cluster in 33 countries and actively participating in the Inter-Agency Standing Committee.
6. The applicant's mandate directly supports the GCF adaptation and resilience objectives by addressing the climate change, human mobility and displacement nexus. Guided by its Institutional Strategy on Migration, Environment and Climate Change 2021–2030⁴, the applicant operationalizes solutions to avert, minimize and address climate-induced displacement while building resilience in highly vulnerable developing contexts, particularly least developed countries and fragile settings. These interventions align with GCF strategic results areas, specifically strengthening the resilience of health, food and water security; livelihoods; ecosystems; and infrastructure. Furthermore, the applicant systematically integrates environmental sustainability and mitigation co-benefits across its operations, supporting low-emission, climate-resilient development.
7. The applicant intends to propose programmes and projects to GCF that are aligned with the national development priorities and climate change strategies of its host countries. By leveraging its country strategies, which are developed in close alignment with the United Nations Sustainable Development Cooperation Framework and national climate goals, IOM ensures that its proposed interventions directly support host countries' nationally determined contributions and national adaptation plans. This alignment specifically targets the integration of human mobility and climate resilience within national adaptation frameworks.
8. The applicant's track record in financing and managing sustainable development and climate change-related projects primarily relies on grant-financing modalities. The applicant manages a global climate portfolio of approximately USD 2.8 billion across more than 1,100 climate change-related projects in 171 countries, with individual project budgets reaching up to USD 150 million. Core interventions focus on climate-resilient infrastructure, flood risk reduction, sustainable livelihoods, disaster risk management, and climate-induced displacement governance in vulnerable and fragile settings. Examples include:
 - (a) USD 123.00 million (grants) for the Enhancing Community Resilience and Local Governance Project (ECRP II) in South Sudan (2023–2026), financing flood mitigation works, adaptive basic infrastructure and risk-informed local governance systems;
 - (b) USD 116.17 million (grants) for Regional Responses to Climate Displacement in Sub-Saharan Africa (RE2CLID) – Cluster 2 (2025–2029), supporting displacement-affected communities through climate-resilient infrastructure, agroecological practices, early warning systems and livelihood diversification;
 - (c) USD 67.00 million (grants) for Contributing to the Economic Recovery of Iraq through Employment Creation and Revitalization of Local Economies (Phase IV) (2019–2025), delivering enterprise development, vocational training and climate-sensitive rehabilitation of market infrastructure;

⁴ See <https://publications.iom.int/books/institutional-strategy-migration-environment-and-climate-change-2021-2030>

- (d) USD 62.14 million (grants) for The Sudan Integrated Social Sector Infrastructure Rehabilitation Project (SISSIRP) (2025–2027), rehabilitating healthcare, vocational, and water and sanitation systems to withstand climate variability and resource stress; and
- (e) USD 28.05 million (grants) for the Climate Change and Migration Data Programme in North, East, and West Africa (2024–2026), generating evidence-based mobility data to mitigate irregular migration and displacement risks along climate-vulnerable corridors.

III. Screening report

3.1 Screening requirements assessed by the Secretariat

3.1.1 Legal status

- 9. The applicant, the International Organization for Migration, is an inter-governmental organization established pursuant to and operating in accordance with its Constitution adopted by the member states of the Intergovernmental Committee for European Migration on 19 October 1953, entered into force on 30 November 1954 (as amended).
- 10. The applicant has provided evidence that it has legal personality, the legal capacity and authority to enter into contracts, and can bear financial and legal responsibility for performing those obligations. Based on the evidence submitted, the Secretariat finds that the applicant meets the “legal status” screening requirement.

3.1.2 International access applicant’s support to direct access applicants

- 11. The applicant demonstrates a clear commitment to supporting subnational, national and regional direct access entities and building partnerships with local organizations, leveraging its extensive network across 172 countries and 557 field offices, including in fragile and conflict-affected states. In close coordination with national designated authorities, the applicant intends to identify suitable national, subnational and local entities with an interest in the human mobility and climate change nexus, engaging them as implementing partners. To enable their accreditation and subsequent project implementation, the applicant will identify capacity gaps and provide targeted training and capacity-building covering institutional policy development, project management and implementation tools, and technical skills for climate finance projects. Furthermore, the applicant will prioritize cooperation with existing direct access entity candidates focused on human mobility, enhancing their technical knowledge in project design and implementation and, where possible, acting as an implementing partner to support project execution on the ground.
- 12. Based on the information submitted, the Secretariat finds that the applicant meets the “international access applicant’s support to direct access applicants” screening requirement.

3.2 Screening requirements assessed by the Accreditation Panel

- 13. As per paragraph 2 above, the applicant is eligible for, and applied under, the fast-track accreditation process as an entity pillar-assessed by EU DG INTPA. The screening requirements for corporate governance and internal control, financial management, procurement, and integrity, except for anti-money-laundering and countering the financing of terrorism (AML/CFT), are considered to have been met by way of fast-track accreditation.

3.2.1 Integrity

14. Regarding AML/CFT, IOM recently upgraded its foundational guidelines on fraud awareness and prevention to a full Policy against Fraud, Corruption and Other Proscribed Practices; the policy expands the defined scope of proscribed practices to broadly align with the GCF Policy on Prohibited Practices and includes money-laundering and financing of terrorism. The policy covers prevention, detection, reporting and investigation of proscribed practices, and it applies to both individuals and third parties in a contractual relationship with the applicant. Furthermore, the policy delineates three lines of oversight roles, sets out staff reporting responsibilities, and outlines reporting and investigation procedures.

15. The AML/CFT component of the policy is operationalized through a multilayered control framework in which AML/CFT risk is embedded across complementary mandatory institutional instructions. Due diligence and know-your-customer processes are incorporated though not standardized in the IOM Procurement Manual, Due Diligence Process for Prospective Collaborations with Private Sector Entities, Implementing Partnerships Management Handbook and Instruction on Administering Financial Grants in IOM Operations. These documents require risk-based due diligence tailored to the counterparty, including sanctions screening and integrity checks against the United Nations Security Council Consolidated List of sanctions, the United Nations Global Marketplace list of ineligible vendors and the World Bank Listing of Ineligible Firms and Individuals. Responsibility for implementation is delegated to second control line functions in procurement, partnership management and private sector engagement. Evidence of implementation provided by IOM includes examples of due diligence/know-your-customer reviews, sanctions screening procedures, counterparty assessments, and integrity checks applied to vendors, private sector entities, implementing partners and grant recipients under the above-mentioned procedures and processes. Regarding operationalization of the Policy against Fraud, Corruption and Other Proscribed Practices, the Institutional Risk Division of IOM is responsible for coordinating its implementation, developing related guidance and awareness materials, and integrating fraud risk prevention and detection into the IOM broader risk management framework.

16. At the transaction level, the IOM common corporate systems (enterprise resource planning and customer relationship management) provide a secondary assurance layer atop upstream due diligence: invoices are verified against contractual terms and delivery evidence by programme, procurement and finance functions, under segregation of duties across procurement, vendor data, invoice processing, payment approval, cash custody and bank reconciliation, with secondary checks and designated approval authorities per the applicant's Financial Management Rules and Procedures. Independent AML/CFT assurance is provided through the Office of Independent Oversight of IOM, which fulfils a third-line internal audit function and publishes its reports⁵ to the IOM governing bodies, specifically the Standing Committee on Programmes and Finance and the Audit and Oversight Advisory Committee, the latter of which has a role in advising the Director General regarding oversight.

17. The AP finds that the applicant meets the screening requirements for integrity.

3.2.2 Project management

18. IOM has established an organization-wide framework through its *Project Handbook*, which governs all stages of the project cycle including project identification, design and appraisal, and implementation and monitoring. The handbook is implemented via the applicant's Project Information and Management Application (PRIMA), which allows for project

⁵ See *Report of the IOM Audit and Oversight Advisory Committee: Activities from November 2024 to October 2025*. Available at https://governingbodies.iom.int/system/files/en/scpf/37th/s-37-16-report-of-the-aoac_0.pdf.

risk classification and portfolio monitoring. Project development and appraisal are undertaken through a structured workflow involving country offices, regional offices and headquarters, with defined responsibilities for technical, financial and management review. Oversight is provided through a mandatory endorsement and activation process requiring review by chiefs of mission, resource management officers, regional thematic specialists and, where applicable, designated headquarters divisions. Evidence of implementation includes operation of the PRIMA workflow and a substantial institutional track record comprising over 1,800 active projects in 172 countries, overseen through nine regional offices and 557 field offices. This demonstrates experience in identifying, designing and later managing projects across subnational, national, regional and international jurisdictions.

19. IOM reports having mobilized approximately USD 15 million to date across its Climate Mobility Innovation Lab and Climate Mobility Investment Facility and their associated tools, including the Regional Investment and Climate Diagnostics, the Climate Catalytic Fund and the Climate Mobility Investment Plans, with a further estimated USD 70 million in prospective funding reportedly under active discussion.

20. Specific track record examples provided by the applicant for project design and appraisal (completed project activation forms and project agreements) include a Kreditanstalt für Wiederaufbau-funded EUR 29.7 million economic recovery and employment creation project in Iraq (commencing in 2022) and a USD 8.5 million water project in South Sudan (operational from 2024) funded by the World Bank Regional Climate Resilience Program for Eastern and Southern Africa.

21. IOM applies a results-based management approach from the project design and appraisal stage, through its Strategic Results Framework 2024–2028 (SRF), *Monitoring and Evaluation Guidelines* and *Project Handbook*. All projects are required to develop results frameworks aligned with the SRF, including objectives, outcomes, outputs, indicators, baselines and time-bound targets, which are monitored throughout implementation and reported through PRIMA. Evidence of implementation includes project results matrices and monitoring frameworks demonstrating the use of key performance indicators, baseline values, targets and reporting arrangements throughout the project lifecycle.

22. The multidisciplinary IOM project review process incorporates technical, financial, legal, environmental, social, climate and risk considerations. Technical appraisal is undertaken by regional thematic specialists and other subject matter experts, while financial appraisal is performed by resource management officers and, where required, the Financial and Accounting Division. Legal review is conducted by the Office of Legal Affairs in accordance with applicable policies and procedures.

23. The AP finds that the applicant meets the screening requirements for project management.

3.2.3 On-lending/blending

24. The applicant did not apply to be assessed against this screening requirement.

3.2.4 Revised Environmental and Social Policy and ESS standards

A. Revised Environmental and Social Policy

25. The IOM environmental policy (EP), approved by the Director General in 2026, forms the cornerstone of its environmental and social management system (ESMS). The EP establishes three environmental standards aligned with the GCF environmental and social safeguards (ESS) and sets out requirements for identifying, assessing, managing and monitoring environmental

and social (E&S) risks and impacts across IOM-supported projects and programmes. Social safeguards requirements are further supported by a suite of institutional policies and frameworks, including the Human Rights Due Diligence Policy on UN Support to Non-UN Security Forces (2021), the Accountability to Affected Populations (AAP) Framework (2021), the Policy on a Respectful Working Environment (2022), the Child Safeguarding Policy (2025), and the Standards of Conduct for Staff Providing Health Services to Migrants. These requirements are operationalized through the Risk Management Policy and Framework, the *Project Handbook* and mandatory safeguarding procedures – all consolidated within the IOM environmental and social safeguarding framework, which is aligned with the World Bank Environmental and Social Framework. The EP and associated safeguard instruments are aligned with key international frameworks, including the United Nations Global Compact, the Sustainable Development Goals and International Finance Corporation (IFC) Performance Standards 1–8, and are implemented in accordance with applicable national legislation.

26. IOM has established a comprehensive framework to prevent and address sexual exploitation, abuse and harassment (SEAH), discrimination and other forms of misconduct. Key instruments include the Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (2016), the Protection against Retaliation Policy (2022), the Reporting and Investigation of Misconduct Framework (2022), the Policy and Procedures for Preventing and Responding to Sexual Exploitation, Abuse and Harassment (PSEAH) Risk Management Toolkit, the Child Safeguarding Policy (2025), the Policy on a Respectful Working Environment (2022), the Disability Inclusion Strategy (2025–2028), and the Institutional Guidance for Community Feedback Mechanisms. Together, these policies and tools establish clear roles, responsibilities and procedures for prevention, reporting, investigation and response, including safeguards for vulnerable populations. These policies adopt a zero-tolerance approach to discrimination and SEAH, and apply to staff, contractors, implementing partners and beneficiaries. Risk screening and appraisal processes incorporate measures to identify, prevent, mitigate and address SEAH risks, including through accessible, community-based grievance mechanisms. Oversight is provided by the Prevention of Sexual Exploitation and Abuse Unit within the Office of Ethics and Prevention of Sexual Exploitation, Abuse and Harassment, supported by regional officers and country-level focal points. SEAH cases are reported annually to IOM Member States through the Standing Committee on Programmes and Finance. The AP notes that IOM has established dedicated institutional arrangements, including a SEAH case management and reporting system, as well as comprehensive training and awareness-raising resources to support implementation of its SEAH framework.

B. Environmental and social management system

27. The IOM ESMS employs structured tools and procedures to identify, assess, manage, monitor and report environmental, social, climate and gender risks in line with the IFC Performance Standards. The Environmental Risk Assessment Tool (ERAT) is applied from the earliest stages of project development and classifies projects using a four-tier risk hierarchy (low, medium, high and very high). Environmental and social screening reports are prepared at the country level, reviewed by regional and headquarters specialists, and approved by senior management. Projects classified as medium, high or very high risk require proportionate management instruments, including environmental risk treatment plans and environmental management plans. IOM has provided sample ERAT forms, environmental and social impact assessments, environmental and social action plans, management plans, and monitoring reports demonstrating its capacity to identify, assess, manage and monitor E&S risks.

28. For activities implemented through intermediaries and partners, IOM applies a precautionary, exclusion-based due diligence approach through its Financial Risk Assessment Tool. Projects are categorized as low, moderate or high risk, and appropriate environmental and social management measures are applied proportionate to the level of risk. Projects that

fail to meet applicable environmental and social requirements, or whose risks cannot be adequately mitigated, are not pursued. Additional evidence of track record is provided through projects implemented for, or financed by, international partners, including bilateral donors and multilateral development banks in Iraq, Somalia and Uzbekistan, demonstrating organizational capacity to implement rigorous funder environmental and social due diligence and management requirements across diverse geographical, sectoral and financing contexts. The AP finds that these practices are consistent with those for GCF risk categories B and C.

29. The IOM EP and the IOM planning, monitoring and reporting policy establish mandatory monitoring requirements across all programmes and projects, while the Risk Management Policy and Framework embed monitoring as a mandatory process. Environmental and social compliance is monitored at programme, subproject and site levels through project reporting, compliance audits, donor supervision missions and portfolio-level oversight. The PRIMA risk module is mandatory for all projects and provides a centralized mechanism for recording risk categories, consequence and impact score, likelihood, timeline, level of risk, impacted country offices, and risk treatment plan at the proposal development stage and throughout implementation. The IOM *Implementing Partnerships Management Handbook* and Private Sector Partnership Due Diligence Process outline the process for screening, assessing and monitoring performance, including environmental and social management of intermediaries and downstream partners. Monitoring and evaluation findings are used to update baselines, indicators and implementation approaches throughout the project cycle. Oversight is provided by the Environmental Sustainability Unit (ESU) and the Institutional Risk Division at headquarters, supported by regional thematic specialists and regional risk and compliance officers. IOM has submitted sample midterm reviews, final evaluations, monitoring reports and baseline–endline studies from projects in Iraq and South Sudan, demonstrating a solid track record of participatory monitoring and evaluation of environmental, social, gender and climate aspects. The evidence also demonstrates capacity to assess compliance with environmental and social obligations and to ensure that corrective and preventative actions are implemented in accordance with updated environmental and social action plans or other relevant management instruments.

30. Stakeholder engagement, information disclosure and grievance redress are primarily governed by the AAP Framework, which has been mandatory across all operations since 2021. The framework establishes commitments to information-sharing, participation and community feedback, and is operationalized through institutional guidance for community feedback mechanisms (CFMs). The guidance establishes minimum requirements for efficiency, accessibility, effectiveness and safety, including confidentiality, data protection and survivor-centred approaches. Supporting tools, such as the Community Response Map and Community Response App, facilitate the collection, analysis and monitoring of community feedback. The Project Handbook also requires project-level grievance mechanisms and environmental and social communication arrangements consistent with institutional standards.

31. The commitment of IOM to transparency and information disclosure is reflected in the SRF, the AAP Framework and the Environmental Management System Manual. Public disclosure is further supported through participation in Greening the Blue⁶ reporting and publication of project information through the International Aid Transparency Initiative, which focuses on enhancing transparency and public reporting for climate finance activities. IOM has also formally committed to disclosing project-level environmental and social documentation, in line with applicable timing and language requirements, for GCF-financed category B/I-2 projects and programmes.

32. ESS are implemented through a multi-tiered institutional structure spanning headquarters, regional and country levels. The ESU serves as the institutional focal point for

⁶ A United Nations initiative focused on reducing the environmental footprint of the United Nations system. See <https://greeningtheblue.org/entities/iom>.

environmental sustainability and ESMS implementation and is headed by a Head of Unit, supported by two core-budget-funded professional staff and two consultants at headquarters. The Institutional Risk Division oversees the broader risk management framework. Regional risk and compliance officers and regional thematic specialists support country offices in risk assessment, compliance and safeguard implementation. At the project level, the ESS Adviser, based within the Programme Support Unit, is supported by project-level E&S Focal Persons. Field staff are responsible for site-level implementation of the environmental and social management framework. The AP positively notes the qualifications, experience and ongoing capacity-building of IOM personnel, including training on environmental and social standards, grievance mechanisms and risk assessment tools. IOM has committed that all GCF-funded projects will undergo review through its PRIMA system, with the Climate Action Division, ESU and regional risk and compliance officers providing quality assurance and environmental and social oversight.

C. Grievance redress mechanism

33. IOM has established an institution-wide grievance redress mechanism (GRM) that enables communities, employees and other stakeholders to submit inquiries and complaints, including anonymously, at both corporate and project levels. The GRM is guided by the AAP Framework, the AAP Toolkit (2020) and the institutional guidance for CFMs (2025), which define complaint-handling procedures, staff roles and responsibilities, functions of AAP focal points, and complaint-recording requirements. These documents establish a standardized process encompassing complaint receipt, registration, screening and categorization, referral, action, and closure with feedback. They also provide minimum service standards and escalation pathways for sensitive matters, including SEAH and fraud. The We Are All In platform,⁷ publicly available on the IOM website, serves as the primary mechanism for submitting sensitive complaints, including SEAH complaints, retaliation complaints and other misconduct allegations, on a confidential basis. Complaints are received and managed by the Office of Internal Oversight.

34. The independence of the GRM is supported through dedicated institutional functions, including the Office of Ethics and Prevention of Sexual Exploitation, Abuse and Harassment, which addresses retaliation and whistle-blower-related complaints; the Office of Independent Oversight, which manages complaint intake, including anonymous reports; and the Office of the Ombudsperson, which provides confidential, impartial and informal dispute-resolution services. These functions operate independently of programme and line management structures. At the country-office level, the AAP/CFM function operates independently of project teams, under the oversight of the Chief of Mission, with support from the senior management team. In December 2025, IOM launched CFM Connect, an organization-wide platform that centralizes the recording, monitoring and resolution of community feedback received through multiple channels, while enabling real-time analysis and independent oversight.

35. Environmental and social grievances arising from projects and programmes are received and managed through CFMs, established by IOM country offices, in accordance with *Institutional Guidance for Community Feedback Mechanisms* and international standards. Stakeholders may submit inquiries and complaints through various channels, including dedicated CFM email addresses, hotlines, WhatsApp and SMS services, call centres, and public contact pages, with hotlines and messaging platforms representing some of the most frequently utilized channels for receiving community feedback and grievances. Complaints are handled confidentially, in accordance with informed consent and data-minimization requirements, and are subsequently categorized, recorded and managed through CFM Connect by CFM operators. Where a complaint cannot be satisfactorily resolved at country office level, the AAP focal point

⁷ See <https://weareallin.iom.int/contact-us>.

or officer escalates the case to the relevant country or regional thematic function, in line with the grievance process. Complaints requiring further review may be referred to the relevant environmental sustainability function, including the ESU at headquarters, for technical advice and support. The CFM is subject to dedicated monitoring, independent of programme monitoring and evaluation, covering performance, response times, case closure and sensitive complaints.

36. The visibility of the CFM is ensured through community awareness sessions and the distribution of visibility materials, complemented by motion graphic videos, including posters and CFM cards, across communities and service delivery points. IOM submitted the AAP framework for Yemen, a CFM for Iraq and Ukraine, and the standard operating procedures for the CFM in Iraq, demonstrating its capacity to screen, assess and address grievances across multiple country missions.

37. The AP finds that the applicant meets the screening requirements for the revised environmental and social policy and the screening requirements for environmental and social standards for activities of up to medium E&S risk (category B/I-2), as applied for.

3.2.5 Indigenous Peoples Policy

38. IOM does not have a stand-alone Indigenous Peoples policy. However, it has established a structured approach to addressing the rights, inclusion and participation of Indigenous Peoples and has formally committed to applying the GCF Indigenous Peoples Policy throughout the project cycle. Key instruments, including the *Protection Mainstreaming Guidance Note*, AAP Framework and *Community-Based Planning Manual*, provide a foundation for culturally appropriate, inclusive and meaningful engagement with Indigenous Peoples. Evidence demonstrates the application of free, prior and informed consent principles through contextual screening, stakeholder engagement and participatory planning processes. This commitment is supported by practical experience in implementing projects involving Indigenous Peoples, particularly in the areas of climate change and human mobility. Examples provided include supporting the participation of Indigenous Peoples in climate adaptation planning in Paraguay, undertaking analytical work in the Caribbean on climate-related impacts and human mobility, and developing the Transhumance Tracking Tool in West and Central Africa to strengthen early warning systems and inform policy responses for Indigenous and pastoralist communities.

39. The AP finds that the applicant meets the screening requirements for the Indigenous Peoples Policy.

3.2.6 Updated Gender Policy

40. The IOM Gender Equality Policy (2024–2028) establishes 5 guiding principles and 15 objectives, supported by commitments to gender analysis, inclusive participation, results-based management, monitoring and evaluation. Its accompanying implementation plan operationalizes these commitments through defined actions, responsibilities, indicators, targets, timelines and alignment with the United Nations System-wide Action Plan, demonstrating institutional accountability, resource allocation and progress tracking. Complementary frameworks, including the Framework for Addressing Gender-Based Violence in Crises and the SRF, support implementation through organization-wide measures to mitigate gender-related risks, support survivors and address root causes. Collectively, these instruments are broadly aligned with the updated GCF Gender Policy through their emphasis on gender analysis, measurable results, accountability, monitoring and reporting, and gender-responsive, survivor-centred approaches.

41. Gender mainstreaming is mandatory under the IOM *Project Handbook* and applies to all projects. Gender markers are tracked through SRF indicators and the PRIMA project management system, with oversight provided by regional thematic specialists.
42. Implementation of the Gender Equality Policy is led by the Gender and Diversity Coordination Unit and the Workplace Culture Unit, supported by a senior-level Steering Committee and a Technical Working Group on Equality, Diversity and Inclusion established in 2025. Institutional capacity includes dedicated gender-based violence specialists at headquarters, regional and country levels, as well as a global Gender Focal Point Network. IOM maintains one gender expert within the Gender Coordination Division, two within the Women's and Youth Unit, and two gender specialists at the country-office level in Afghanistan and Ukraine. In relation to gender-based violence (GBV), as at December 2025, IOM reported five GBV specialists at headquarters and regional office levels and nine GBV specialists deployed across country offices. By the end of 2024, 81 per cent of staff had completed mandatory gender equality training and more than 450 front-line personnel had received training on GBV risk mitigation and disclosure handling.
43. IOM promotes women's participation in decision-making and gender parity across its workforce. Women represented 52 per cent of professional staff in 2025, while representation at senior levels increased from 43 per cent in 2024 to 48 per cent in 2025. IOM has also demonstrated a strong track record in gender-responsive programming, knowledge generation and capacity-building. The applicant has demonstrated that project examples from South Sudan benefited 100,000 internally displaced persons, 70 per cent of whom were women, while similar initiatives in Nigeria and Somalia strengthened women's participation and decision-making capacity.
44. The AP finds that the applicant meets the screening requirements for the updated gender policy.

3.3 Observations for the applicant

45. The applicant is encouraged to continue the process of aligning its functional handbooks and manuals with its upgraded and revised Policy against Fraud, Corruption and other Proscribed Practices.

IV. Recommendations

46. Based on the assessment, the applicant is found to have met all applicable screening requirements.
47. Therefore, the AP recommends APL192 for accreditation and that it be accredited for **maximum environmental and social risk category: medium risk (category B/I-2)**.
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