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Ethics

Activities of the UNOPS Ethics Office in 2024

Report of the Ethics Office

Summary

This report is submitted to the Executive Board in accordance with paragraph 9 of decision 2010/17 whereby the UNOPS Ethics Office is requested to submit its report to the Executive Board at its annual session.

In accordance with section 3(h) of the Secretary-General's Bulletin ST/SGB/2007/11 ('*United Nations system-wide application of ethics: separately administered organs and programmes*'), the UNOPS Ethics Office provides this report annually to the Executive Director. Additionally, pursuant to section 5.4 of that Bulletin, the Ethics Panel of the United Nations reviewed the draft report during its 174th meeting on 14 January 2025. The UNOPS Audit Advisory Committee reviewed the draft report in January 2025.

The present report covers the period from 1 January to 31 December 2024.

This is the 16th annual report presented by the UNOPS Ethics Office since its establishment in 2009.

Elements of a decision

The Executive Board may wish to take note of the present report and comment on progress made by the UNOPS Ethics Office in continuing its efforts to promote a culture of ethics at UNOPS.



Contents

<i>Chapter</i>	<i>Page</i>
I. Introduction	3
II. Composition and independence of the Ethics Office	4
III. Mandated activities	4
A. Policy and standard-setting	6
B. Confidential advice and guidance	8
C. Training and awareness-raising	10
D. Protection against retaliation	11
E. Financial disclosure programme	14
F. Other activities	15
IV. Ethics Panel of the United Nations and Ethics Network of Multilateral Organizations	15
V. Conclusion	16

I. Introduction

1. This report, submitted in accordance with decision 2010/17 of the Executive Board of UNDP, UNFPA and UNOPS, covers the activities of the UNOPS Ethics Office in 2024.

2. The Ethics Office, based in Copenhagen, provides its services to approximately 5,550 UNOPS personnel (approximately 13 per cent staff and 87 per cent international and local contractors, as of 31 December 2024), serving in over 85 countries around the world.

3. The Ethics Office, established in 2009 pursuant to the Secretary-General's Bulletin 'United Nations system-wide application of ethics: separately administered organs and programmes' (ST/SGB/2007/11), operates on the principles of independence, impartiality and confidentiality. Aligned with the mandate of the ethics offices of other separately administered organs and programmes, the Office is tasked to "cultivate and nurture a culture of ethics, integrity and accountability, and thereby enhance the trust in, and credibility of, the United Nations, both internally and externally". Its responsibilities include:

- (a) developing standards, training and education on ethics issues;
- (b) providing guidance to management to ensure that UNOPS policies and procedures promote the standards of integrity called for under the Charter of the United Nations;
- (c) providing confidential advice and guidance to personnel on ethical issues;
- (d) raising awareness on ethical standards and expected behaviour;
- (e) receiving requests for the protection of personnel against retaliation, in accordance with the respective policy;
- (f) administering the UNOPS financial disclosure programme; and
- (g) providing to the executive head an annual report on the activities of the Ethics Office.

4. In addition to those responsibilities, pursuant to ST/SGB/2007/11 Amend.1, the Director of the UNOPS Ethics Office is a member of and participates in the work of the Ethics Panel of the United Nations, comprising the heads of ethics offices of the separately administered organs and programmes of the United Nations and chaired by the Director of the Ethics Office of the United Nations Secretariat (presently nine members).

5. Following the initiation of a comprehensive response plan at UNOPS in 2023, the year 2024 was marked by continued stabilization of Ethics Office operations, with a focus on completing the reforms of the speak-up and whistle-blowing mechanism and further strengthening practices of the Office to rebuild trust internally and externally in the delivery of its core mandate.

6. In 2024, the Ethics Office again saw increased demand for its services, by almost 22 per cent as compared to 2023, handling 1,582 ethics-related matters, approximately 60 per cent of which pertained to services rendered (including policy and standard-setting and protection against retaliation), and approximately 40 per cent to providing ethics advice and guidance, including on outside activities and potential conflicts of interest. Activities of the Ethics Office in 2024 included:

- (a) **Policy and standard-setting.** Pursuant to Executive Board decision 2022/24, the UNOPS Ethics Office, in cooperation with the Executive Director, reviewed and reformed the whistle-blowing and speak-up process at UNOPS in 2024 in collaboration with internal stakeholders, completing this item from the comprehensive response plan. The Ethics Office developed a reference code of ethics for UNOPS.
- (b) **Protection against retaliation.** The Ethics Office further implemented UNOPS "whistleblower" protection policy (Ref.OI.Ethics.2022.01, 'Protection against Retaliation'), and handled 62 matters in 2024.
- (c) **Training and awareness-raising.** In 2024, the Ethics Office continued to roll out its global awareness-raising campaign ('Ethics in Action') to contribute to a culture of ethics, integrity and accountability at UNOPS. Seven in-person and eight virtual sessions were held in the New York Service Cluster, the Middle East Region and the Headquarters Surge Team, with over 780 participants across all levels and contract types.

(d) **Advice and guidance.** The Ethics Office continued to provide ethics advice and guidance to individuals and management in 626 matters.

(e) **Coherence.** Throughout 2024, the Director of the UNOPS Ethics Office served as the Alternate Chair of the Ethics Panel of the United Nations and participated in two working groups on the harmonization of ethics-related practices and policies among Panel members.

(f) **Financial disclosure programme.** UNOPS partnered with the United Nations Secretariat Ethics Office following a memorandum of understanding to provide services in the execution of its financial disclosure and conflict-of-interest programme. In 2024, 1,134 statements by UNOPS personnel for the 2023 financial disclosure cycle were reviewed as part of the programme.

II. Composition and independence of the Ethics Office

Composition

7. In 2024, the Ethics Office operated with a structure comprising a Director (D-1), two Ethics Advisors at the P-4 level, two Ethics Specialists at the P-3 level, and an Ethics Associate at the G-6 level, totalling six fixed-term positions. At the time of the writing of this report, the Ethics Office is fully staffed.

Confirmation of independence

8. In line with the standards on independence enumerated by the Joint Inspection Unit (JIU) in its review of the ethics function in the United Nations system (JIU/REP/2021/5), the UNOPS Ethics Office confirms its compliance with those standards and its operational independence during this reporting period.

9. The Director of the Ethics Office, who reports directly to the Executive Director, had regular in-camera sessions with the UNOPS Audit Advisory Committee in July and December 2024. Throughout 2024, the Ethics Office had unhindered access to the Executive Board and provided an in-camera briefing in December 2024.

10. The office was free from interference in carrying out its mandate and identifying its work programme, budget and priorities in 2024. The Executive Director and his management team responded positively to eight critical recommendations from the Ethics Office and to advice provided in the areas of conflict of interest, protection against retaliation and systemic issues.

III. Mandated activities

11. In 2024, the Ethics Office handled 1,582 matters (figure 1), a 22 per cent increase from the 1,294 matters handled in 2023 (figure 2). While this trend is linked to increased awareness of the services provided by the Office and its training and communications activities, it is also a reflection of the increased workload of the Ethics Office, throughout 2024, in leading the review and reform of the whistle-blowing and speak-up processes and the development of a code of ethics.

12. Of the 1,582 matters handled in 2024, 626 were related to ethics advice and guidance, while 956 were related to other mandated services provided by the Ethics Office.

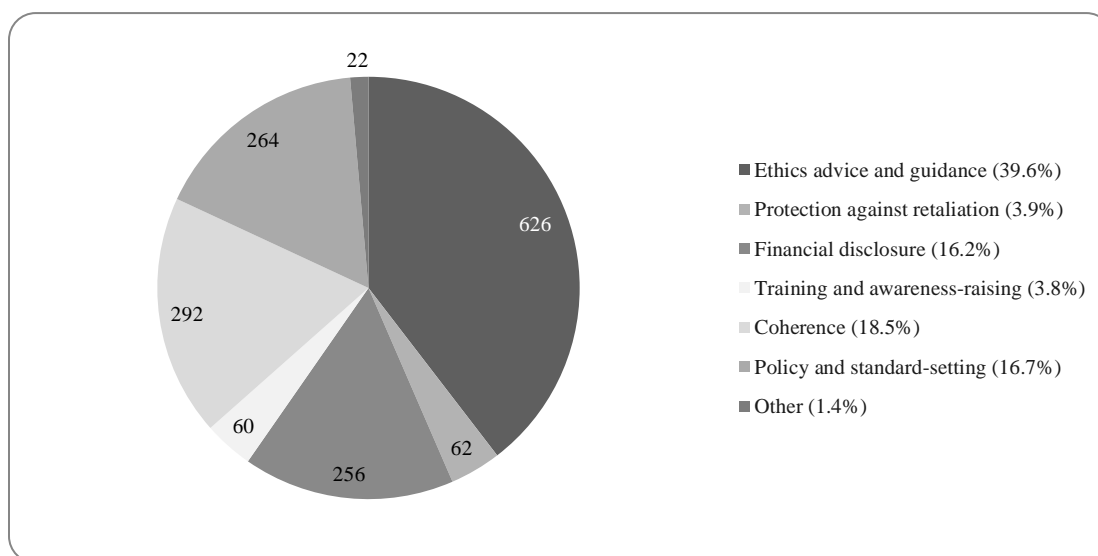
13. The 956 matters related to services represent an increase from 741 in 2023. This area represents approximately 60 per cent of the Ethics Office workload. Such services include policy- and standard-setting, review of queries on the annual and on-boarding financial disclosure and conflict-of-interest programmes; contributing to coherence in internal and external practices relating to ethics; engaging in training and awareness-raising activities; and protection against retaliation. As outlined above, the driver for the substantive increase was related mainly to the work on policy and standard-setting linked to the reform of the whistle-blowing and speak-up processes and the development of a code of ethics for UNOPS. The UNOPS Ethics Office continued to strengthen its engagement in the work of the Ethics Panel of the United Nations and expanded its scope of work to include screening financial disclosures and conflicts of interest in

cooperation with the United Nations Secretariat Ethics Office for the financial disclosure and conflict-of-interest programmes and at the on-boarding stage.

14. The 626 matters related to ethics advice and guidance (figure 3) constitute approximately 40 per cent of the Office workload. The portfolio includes advice and guidance on outside activities; potential perceived or actual conflicts of interest; employment matters; receiving gifts and honours; and potential misconduct. The main increase here is related to requests received with respect to advice on conflicts of interest (approximately a 10 per cent increase) and engagement in outside activities (23 per cent increase).

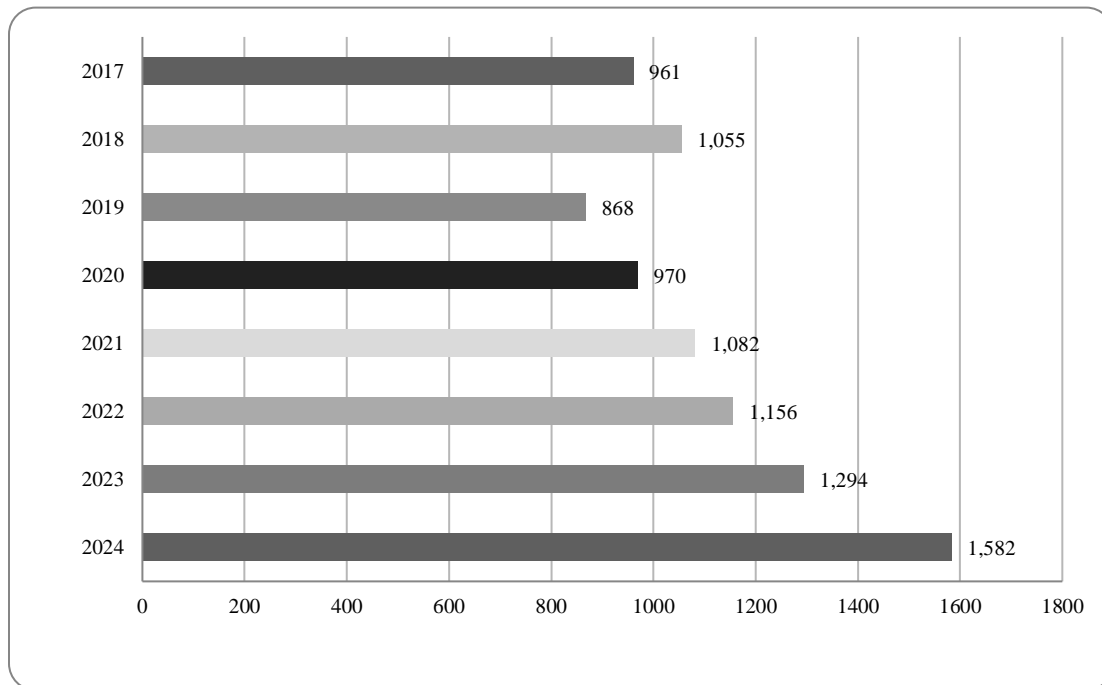
15. The following is a detailed outline of the 1,582 matters handled depicted in figures 1 and 2 (see section A, ‘Policy and standard setting’) and figure 3 (section B, ‘Confidential advice and guidance’). Dedicated sections outline activities related to ‘Training and awareness-raising’ (section C); ‘Protection against retaliation’ (section D, figures 4 and 5); and the ‘Financial disclosure programme’ (section E).

Figure 1. Breakdown of matters handled, 2024,¹ by category



¹ **Key to categories**

Ethics advice and guidance: Advice and guidance provided in line with the mandate of the Office. **Protection against retaliation:** Formal requests for protection against retaliation and advice given in such cases; cases handled as Alternate Chair. **Financial disclosure:** Administration, follow-up and policy clarification in the context of the financial disclosure and conflict-of-interest programmes. **Training and awareness-raising:** Creation and delivery of training and awareness-raising activities. **Coherence:** Collaboration, coordination and information-sharing with the Ethics Panel of the United Nations, other multilateral organizations and other UNOPS units for efficiency gains and to align procedures and practices. **Policy and standard-setting:** Initiatives with respect to ethics policies, collaboration with other units on related policies; work carried out to meet JIU recommendations.

Figure 2. Matters handled, 2017-2024

A. Policy and standard-setting

16. A core responsibility of the UNOPS Ethics Office is to develop standards on ethics-related issues and to provide guidance to management so that UNOPS rules, policies, procedures and practices reinforce and promote applicable standards of integrity. The Director of the Office participates in the UNOPS management team in an ex-officio advisory capacity.

Overhaul of the speak-up and whistle-blowing processes

17. Given the importance of decision 2022/24, a main priority for the Ethics Office in 2024 was to complete the review and implementation of the “overhaul [of] the speak-up, whistle-blowing process” at UNOPS².

18. As reported to the Executive Board through an information note dated 16 December 2024 for its first regular session 2025 (item 14, ‘Information Note: Completion of Speak-up and Whistle-blowing Mechanism Overhaul’), the review and implementation is completed and was launched on 24 January 2025. Additionally, the Director of the Ethics Office provided a presentation on the overhaul to the Executive Board during an in-camera session on 11 December 2024.

19. Besides focusing on rebuilding trust, the review took a holistic and comprehensive approach to address issues identified in the relevant reports. Notably, it included a systematic review of previous reports such as the “Assessment of UNOPS’ Reporting of Wrongdoing and Grievances Management” (January 2022), the “Third-party Review of the Internal Control Systems, Risk Management and overall Governance Structures” (November 2022) and the “Review of Organizational Culture” (October 2023). During the review phase, consideration was given to the relevant ISO standard on whistle-blowing management systems, the relevant JIU report on whistle-

² Please note that this review is separate from the request of the Executive Board to update the policy on protection against retaliation, which was completed in August 2022 (DP/OPS/2023/4, para. 57).

blowing (JIU/REP/2018/4), and a benchmarking of relevant practices and procedures from comparable organizations.

20. Reviewing perspectives from a series of stakeholder discussions with the Office of the Ombudsman; diversity focal points; the focal point for protection against sexual exploitation, abuse and harassment; support and advocacy focal points; and staff and personnel associations, the Ethics Office engaged with a cross-cutting personnel focus group as a sounding board.

21. In the process, final decisions on key reforms were taken by a steering committee consisting of the main responsible offices of whistle-blowing processes at UNOPS, whose members were advised by a group of subject-matter experts. The steering committee comprised the Executive Director, the Deputy Executive Director for Management and Policy, the Chief of Staff, the Director of the Internal Audit and Investigations Group, the Director of the People and Culture Group, the General Counsel, and the Director of the Ethics Office.

22. Elemental aspects of the key reforms, which can be publicly accessed at <https://integrity.unops.org/>, are: (a) a portal hub to provide coherent guidance and resources for UNOPS personnel with a direct reporting mechanism and an AI-powered chatbot for non-confidential queries; (b) a navigation focal point for guidance and information on whistle-blowing procedures with an aim to de-escalate; (c) a workplace conduct team within the People and Culture Group to handle harassment and other interpersonal workplace issues and to promote early intervention and de-escalation; and (d) the establishment of an interdisciplinary committee to improve cross-discipline coordination and systemic risk identification³.

23. Looking beyond the January 2025 launch, the Ethics Office will focus its attention on the awareness-raising activities needed to ensure a smooth roll-out and adoption of the reforms, with a view to continuous improvement.

Development of a UNOPS reference code of ethics

24. Equally, a main priority for the UNOPS Ethics Office in 2024 was the development of a UNOPS code of ethics (“[Ethics starts with me](#). A reference code”⁴).

25. Linking to the observation of the Joint Inspection Unit (JIU/REP/2021/5, paragraph 179), that such codes are “important vehicles by which to communicate (...) key standards of acceptable and prohibited behaviour”, the UNOPS Ethics Office, in collaboration with the Executive Director, developed such a code for UNOPS based on the standards of conduct for the international civil service, “Status, basic rights and duties of United Nations staff members” (ST/SGB/2016/9) and applicable UNOPS administrative issuances.

26. Enhancing the everyday usability of the document, inputs from management, technical leads, the personnel association, subject-matter experts and focus groups were sought. The document features user-friendly language, practical examples, actionable checklists, and support resources for ethical decision-making.

27. Aligning and reinforcing UNOPS core values, culture statements and ethical commitments, it is hoped that the document will strengthen UNOPS work towards ethics, integrity, and accountability by offering tailored, scenario-based guidance to address everyday ethical dilemmas. The code of ethics was launched alongside the updated whistle-blower ecosystem on 24 January 2025 (<https://integrity.unops.org/>).

³ For more detailed background information please refer to ‘Information Note: Completion of Speak-Up and Whistle-blowing Mechanism Overhaul’, dated 16 December 2024, for the first regular session 2025.

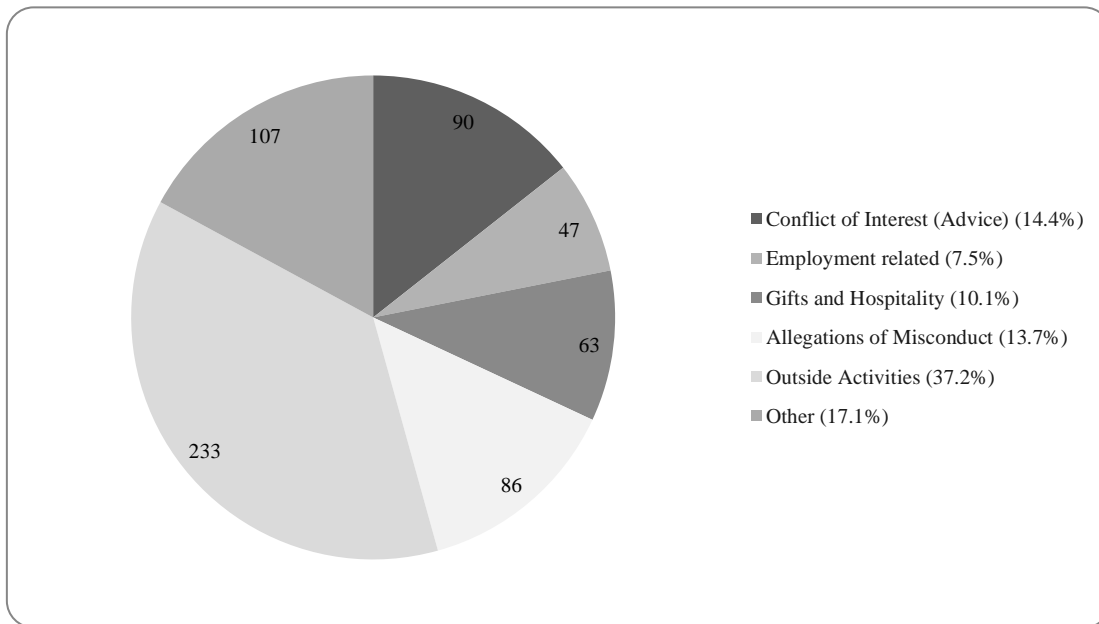
⁴ Available at: https://content.unops.org/publications/UNOPS-Code-of-Ethics_EN.pdf.

B. Confidential advice and guidance

28. Maintaining a focus on providing confidential ethics advice and guidance directly to individuals is a critical part of the role of the Ethics Office. Any member of UNOPS personnel may contact the Office directly for confidential, independent and impartial advice on ethics-related questions and dilemmas.

29. As outlined above, 626 matters related to ethics advice and guidance were handled in 2024 (figure 3). They contained proactive advice and guidance on outside activities, receiving of gifts and honours, potential misconduct, and potential perceived or actual conflicts of interest.

Figure 3. Breakdown of matters related to ethics-related advice and guidance, 2024⁵



Outside activities

30. Necessarily, the primary obligation of UNOPS personnel is to devote their energies and time to the work of the organization. Therefore, personnel have only limited ability to engage in outside activities under the conditions and restrictions outlined in Operational Instruction OI.Ethics.2018.04 ('Outside Activities').

31. According to OI.Ethics.2018.04, the Ethics Office reviews outside activity requests by all UNOPS personnel (including from fixed-term staff and international and local contractors) with a view to identifying potential conflicts of interest and reputational risks to the organization. The Office also recommends measures to maintain the independence and impartiality expected of UNOPS personnel and to protect the integrity of the organization, as required by the relevant rules.

32. In 2024, the Ethics Office received 233 requests for outside activities (37 per cent of total), representing an increase of 27 per cent compared to 2023. Partly owing to increased awareness of

⁵ **Key to categories**

Conflict of interest (advice): Includes advice on and the mitigation of possible conflicts of interest. **Employment-related:** Includes advice on ethics issues in relation to recruitment, employment and post-employment restrictions. **Gifts and hospitality:** Includes advice on the receipt of gifts and hospitality under the applicable policy. **Allegations of Misconduct:** Includes advice on duties and options in circumstances of possible misconduct and possible referrals. **Outside activities:** Includes advice and requests for approval of outside activities under the applicable policy. **Other:** Includes advice provided to management and personnel (with queries related to policy guidance as the largest subcategory (29 matters)).

the topic – driven by Ethics Office outreach and communication activities – and partly to the launch of a user-friendly form encouraging personnel to obtain guidance and approval before engaging in outside activities, the Ethics Office views this trend as positive. Guidance in this area usually includes advice and recommendations for approval of outside employment or other types of occupation; memberships on external boards, committees or similar bodies; and speaking engagements and publications.

33. Given that 87 per cent of personnel at UNOPS are engaged under the individual contractor agreement (ICA) modality – and are thus considered non-staff personnel while at the same time being bound by the applicable UNOPS policies when it comes to outside activities – the Ethics Office must review each request carefully, considering the facts presented and individual circumstances as well as the unique complexities associated with this contract modality.

34. Over the reporting period, the Ethics Office made sustained efforts to streamline its practices further and to promote coherence with the guiding principles of the Ethics Panel of the United Nations on outside activities.

Gifts, honours, remuneration or benefits

35. Managing the obligation of UNOPS personnel to refuse gifts, honours, decorations, favours or any form of non-United Nations remuneration or benefits in the course of their official duties is another key element of the work of the Ethics Office. Such benefits may create obligations that could lead to conflicts of interest. Therefore, unless exceptional circumstances apply in accordance with section 3.2 of OI.Ethics.2020.01 ('Prohibition of accepting gifts, honours, decorations, favours or non-United Nations remuneration or benefits from governmental and non-governmental sources'), they must be refused. In 2023, those prohibitions were codified in the UNOPS anti-bribery and anti-corruption policy (EOD.ED.2023.01).

36. Following its policy, preventive advice in this area continues to be the responsibility of the Ethics Office, and all receipts of gifts and honours by UNOPS personnel must be disclosed to the Ethics Office within seven days. The Ethics Office then provides directions on the next steps.

37. Compared to 2023 (which saw a steep increase in inquiries compared to the year before), the Ethics Office received 63 requests for advice with respect to this category in 2024 (representing 10 per cent of the total advice provided, with no significant variation compared to 2023).

38. Specifically driving further efficiencies in the process and expediting the delivery of practical advice and disclosure, in December 2024 the Ethics Office created and launched a new gifts disclosure and advice form to help UNOPS personnel navigate requests in line with OI.Ethics.2020.01. To drive broad awareness around the issue, the Ethics Office has dedicated separate sections to the topics of "gifts" and "anti-corruption" in the code of ethics and continues to further align its practices with those of the members of the Ethics Panel of the United Nations.

Conflicts of interest

39. Identifying and proactively disclosing actual, potential or perceived conflicts of interest is a key obligation of UNOPS personnel. Where a conflict of interest is identified, it shall be resolved in the best interests of the organization. While conflicts of interest should be disclosed in the first instance to the head of office, the Ethics Office is often consulted and provides advice to personnel and management to prevent and manage such conflicts.

40. Levelling out at 90 cases of conflict-of-interest advice provided by the Ethics Office in 2024, this represents a slight increase of 9.7 per cent compared to 2023 (82 cases). This category includes personal, functional, and organizational conflicts of interest but excludes advice provided separately under the financial disclosure programme. In most cases, the Ethics Office provided preventive recommendations, including in the form of mitigating measures, or referred the case to the subject-matter expert office, for instance in relation to procurement-related matters.

41. Under a review of current on-boarding processes at UNOPS for both fixed-term and individual contractor agreement holders, in 2024 the Ethics Office updated and launched a new financial and

conflict-of-interest disclosure form and a form for disclosure of potential, actual or perceived conflicts of interest. The Ethics Office engaged with the Procurement Group in updating its manual in relation to conflicts of interest, including conflicts specific to suppliers, and will continue to engage with critical stakeholders to update relevant practices and procedures in 2025.

C. Training and awareness-raising

42. According to ST/SGB/2007/11, the Ethics Office is mandated to develop training and education on ethics issues.

“Ethics in Action”

43. In November 2022, the Ethics Office launched a comprehensive global awareness-raising campaign (“Ethics in Action”) to re-invigorate a culture of ethics, integrity and accountability. Its roll-out continued through 2023 and concluded in 2024. The programme aimed to raise awareness on ethics-related topics among UNOPS personnel on the management of ethical dilemmas, the availability and challenges of a healthy “speak-up” culture, and channels to raise concerns about potential misconduct, including the updated policy on protection against retaliation.

44. The programme, conducted both virtually and in-person by the Ethics Office, was regularly accompanied by a pre-briefing with regional leadership and a post-training evaluation after the conclusion of each regional roll-out. The Office offered follow-up through in-depth sessions on individual topics, such as “outside activities”, “conflicts of interest” and “political activities and social media”. To encourage a culture of dialogue and constructive dissent at the country and team levels, the Ethics Office piloted and provided materials for a management-facilitated “Ethics-in-Action team dialogue”.

45. In 2024, seven in-person and eight virtual “Ethics-in-Action” sessions were held for the Headquarters Surge Team (March 2024), the New York Service Cluster (June 2024), and the Middle East Region (November 2024), covering over 780 participants. In total, in the two years of its roll-out, “Ethics-in-Action” reached more than 2,000 personnel across all levels and contract types in 45 sessions covering six regions.

46. According to feedback surveys submitted by participants following the sessions, most participants (approximately 80 per cent) indicated that the content of the training was relevant to their daily work. Approximately 85 per cent of the participants indicated that they felt better equipped to handle issues covered by the Ethics-in-Action campaign after attending one of its sessions. Similarly, approximately 80 per cent of the participants indicated that after attending an Ethics-in-Action session they would be likely to speak up should they witness misconduct.

47. Compared to 2023, the training-related activities of the Ethics Office saw a temporary decrease due to the dedication of its workforce to an increasing advisory caseload and expanded activities relating to the UNOPS overhaul of the whistle-blowing processes. In the course of 2025, the Ethics Office will aim to rededicate its resources towards training and awareness-raising activities. This is not only with a view to continuing the positive impact of its “Ethics in Action” campaign and evaluate lessons learned, but also to effectively accompany the launch and adoption of the overhauled UNOPS whistle-blowing processes and code of ethics.

Senior leader induction briefings

48. In 2024, the Ethics Office continued to place emphasis on newly appointed leaders. During 2024, the Director of the Ethics Office conducted eight orientation and induction sessions for new senior leaders at UNOPS, including the incoming Deputy Executive Director (Delivery and Partnerships), the New York Board and External Relations Office Director, country directors and country managers, heads of programme, and heads of support services. Participants were briefed on the mandate and scope of the work of the Ethics Office and their responsibilities in relation to a culture of ethics at UNOPS.

Mandatory ethics and standards of conduct refresher

49. Implementing recommendation 3 of JIU/REP/2021/5, the Ethics and Standards of Conduct e-learning course, which was launched in 2021 for new-joiners, is now a mandatory refresher that all personnel must complete every two years. In 2024 over 440 members of personnel who were required to retake the course obtained a recertification upon completion of the programme.

Other awareness-raising activities

50. In 2024, the Ethics Office participated in multiple ad hoc training and awareness-raising activities, such as a briefing for the Executive Board of Stop Tuberculosis on the mandate and activities of the UNOPS Ethics Office (January 2024); participation in regional communications meetings in the regional offices for Africa, Asia, Europe and Central Asia, and Latin America and the Caribbean on the personal use of social media (January 2024); a session for the United Nations Global Pulse on outside activities (July 2024); a session for the Nicaragua country office on conflicts of interest (August 2024); and a session for the Global Leadership Network at its annual retreat, 2024, on outside and political activities and the personal use of social media (October 2024).

51. The Ethics Office provided information to UNOPS personnel through messaging from the Executive Director, regional or corporate function directors on communications and public activities (January 2024); the importance of adherence to high ethical standards (February 2024); the refresher course on ethics and standards of conduct (January and July 2024); an annual update on the work of the Ethics Office; and a reminder of the UNOPS policy on receiving gifts during the holiday season (December 2024).

D. Protection against retaliation*Introduction*

52. Protecting whistle-blowers from retaliation under its ‘Protection against Retaliation’ policy (Ref.OI.Ethics.2022.01) is a key part of the mandate of the Ethics Office.

53. In 2022 the Ethics Office reviewed, updated and published its policy in accordance with decision 2022/16, is continuously reviewing its practices in this respect, and will continue to do so following the launch of the revised speak-up and whistle-blowing processes (decision 2022/24).

54. Individual cases for protection against retaliation require detailed review and evaluation of the facts presented and the gathering of additional information, since allegations of retaliation for raising misconduct are often complex and time-sensitive, and include protracted and evolving dynamics.

55. In 2024, the Ethics Office handled 62 matters related to protection against retaliation, comparable to 2023 (60 matters). Of those 62 matters, 16 per cent (10) were recorded as formal cases for protection against retaliation where a full review is undertaken and a memorandum issued, representing a decrease from 2023 (figure 4). Seventy-three per cent of the matters (45) were related to advice to individuals concerned about potential retaliation issues. The remaining 11 per cent (7 matters) pertained to Ethics Panel secondary reviews of no prima facie determinations of the United Nations Secretariat Ethics Office conducted in 2024. The UNOPS Ethics Office recorded a slight decrease in protection-against-retaliation matters directly related to UNOPS (55).

56. Generally in this category, the Office differentiates between two types of cases: requests for advice (paragraph 57) in relation to retaliation, the applicable policy, and their concerns about possible retaliation; and requests for formal protection (paragraph 59), where individuals have already engaged in a protected activity and believe they are the subject of retaliation.

Requests for advice

57. The Ethics Office received 45 requests for advice in 2024 (on a par with 2023, with 44 requests) and sees this as an expression of continued awareness and trust on the part of personnel to come forward to the Ethics Office with possible concerns.

58. Approximately 70 per cent of the matters in this category concerned underlying issues linked to interpersonal conflicts, performance appraisals, or allegations of harassment or abuse of authority by a manager.

Requests for protection against retaliation

59. In handling a formal case of protection against retaliation, the Ethics Office will review whether the requestor has engaged in a “protected activity” and has been subjected to a “detrimental action” that adversely affects their employment or working conditions, for the purpose of punishing, intimidating or injuring that individual because they engaged in that protected activity (“causality requirement”). Overall, the year saw a decrease in formal cases received from UNOPS personnel as compared to 2023 (figure 5).

60. In 2024, most of the detrimental actions alleged to be retaliatory in the 10 formal cases were linked to harassment, abuse of authority or performance appraisals.

61. Of the 10 formal cases received in 2024, six were closed in 2024, three are still under review at the time of writing this report, and one was withdrawn by the reporter. The Ethics Office issued formal memoranda to the requestors in the six closed cases.

62. Of the six closed cases, taking into consideration the conditions outlined in paragraph 59, above, five did not meet the prima facie standard required by the policy. In four of those cases, the requestors had engaged in protected activities and detrimental actions were found to have occurred. However, a prima facie causal connection between the protected activity and the detrimental actions was not established in either of those cases.

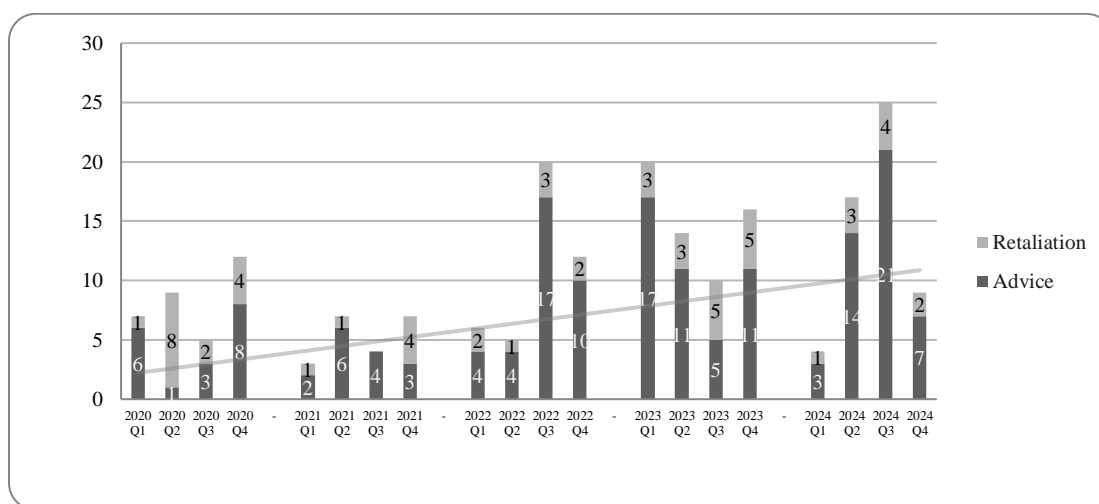
63. In one case, however, the Ethics Office found that there was participation in a protected activity with ensuing detrimental actions and a prima facie case that the protected activity had been a contributing factor in causing the alleged retaliation. Therefore, in 2024 the Ethics Office referred that case to the Internal Audit and Investigations Group for investigation. The investigation report is expected to be received early in 2025, at which time the Ethics Office will conduct an independent review of the report and issue a final determination.

Prevention activities

64. In addition to the above, the Ethics Office can recommend actions in line with its policy during its review where (a) there is an immediate risk to the safety and security of an individual; (b) interim measures need to be taken to safeguard the interests of an individual during the preliminary review stage or any subsequent investigation; or (c) an individual is at risk of retaliation and preventive action is appropriate.

65. In 2024, interim measures were recommended to management in two cases. Details of the recommendations are not shared for confidentiality reasons. In all cases the recommendations were swiftly implemented by management.

Figure 4. Advice requests and review of allegations of retaliation (excluding the Ethics Panel of the United Nations)

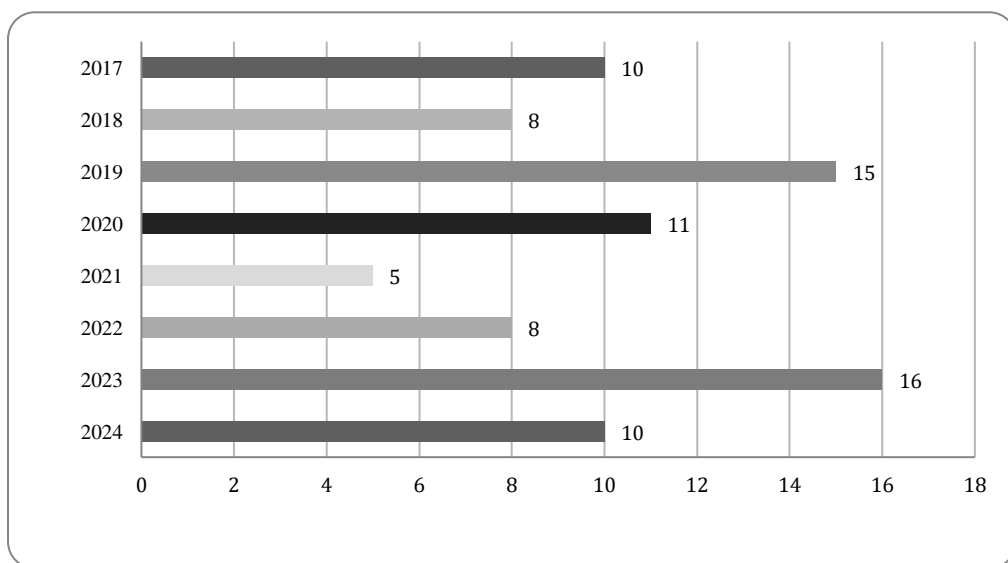


Secondary reviews by the Ethics Panel of the United Nations

66. A requestor receiving a determination by the UNOPS Ethics Office that there was no prima facie case of retaliation may seek recourse by requesting a secondary review of that determination by the Chair of the Ethics Panel of the United Nations.

67. Two such requests for secondary review of determinations of the UNOPS Ethics Office were received by the Chair of the Ethics Panel in 2024. In both cases the UNOPS determinations were upheld.

Figure 5: Requests for protection against retaliation: 2017 – 2024



E. Financial disclosure programme

68. In accordance with section 3(g) of ST/SGB/2007/11, the Ethics Office administers a financial disclosure programme.

69. Its purpose is to assist designated United Nations personnel in identifying, mitigating and managing conflict-of-interest risks arising from their financial interests, personal affiliations or outside activities, as well as those of their immediate family members. Participants who fulfil their financial disclosure obligation contribute to enhancing the credibility of, and public trust in, the organization.

70. Pursuant to the relevant terms of a memorandum of understanding between UNOPS and the United Nations Secretariat signed in 2023, the United Nations Ethics Office provided financial disclosure programme services to UNOPS for the first time in 2024. Accordingly, starting from the 2024 filing cycle, designated UNOPS personnel participated in the United Nations financial disclosure programme administered by the United Nations Ethics Office. To streamline its practices, the UNOPS Ethics Office partnered with the United Nations Ethics Office to ensure that UNOPS personnel designated to file a statement according to the relevant UNOPS policy comply with the requirements of the financial disclosure programme.

71. In accordance with UNOPS policy ('Financial Disclosure and Conflict of Interest Statements', Ref.OI.Ethics.2018.02), required filers are: (a) all internationally recruited staff members at the P-5 level and above; (b) non-staff personnel on individual contractor agreements from the ICA-4 level and above; and (c) other personnel, including fixed-term and individual contractor agreement holders whose principal duties involve procurement and investment or who have direct access to confidential procurement or investment information. Following submission, disclosures are reviewed by a third-party service provider contracted by the United Nations Secretariat.

72. Prior to the launch of the 2024 filing cycle, partnering with the United Nations Ethics Office, the UNOPS Ethics Office organized two customized briefings on the United Nations financial disclosure programme in February 2024, for UNOPS personnel required to file disclosure statements. The briefings covered topics such as disclosure requirements; how to submit statements; review procedures; and measures to identify and manage conflict of interest. Throughout the filing cycle, the UNOPS Ethics Office provided administrative support to the participants and monitored their compliance status to ensure that UNOPS personnel promptly submitted their disclosure statements and followed the advice provided to them under the financial disclosure programme. To assist with the review process, the UNOPS Ethics Office provided relevant policy clarifications to the United Nations Ethics Office upon request. The UNOPS Ethics Office engaged with filers and provided additional support in 248 instances (follow-up and information technology-related queries).

73. During the 2024 filing cycle, conducted from 1 March until 31 December 2024, a total of 1,134 UNOPS personnel members participated in the United Nations financial disclosure programme. By closure of the filing cycle, all UNOPS personnel (100 per cent) submitted their statements, with 795 filers (70 per cent) submitting their disclosure statements within the deadline, and 339 filers (30 per cent) submitting after the deadline. Although this was the first time that UNOPS personnel participated in the United Nations financial disclosure programme, the full submission rate demonstrated the understanding of UNOPS filers of the need to identify and manage conflict of interest and the active engagement and support provided to filers by the UNOPS Ethics Office.

74. While 100 per cent of designated filers submitted their disclosure statements, review of 1,117 filers was completed by the end of the cycle (98.5 per cent), 17 filers (1.5 per cent) did not complete all procedures required for the closure of their file by 31 December 2024. Required procedures included responding to requests for clarification or additional information, providing third-party documentation for verification purposes, and submitting related documents or implementing recommendations to manage possible conflicts of interest in a timely manner. At the time of submission of this report, follow-up with those filers continues. Eventually, filers whose

files were not closed in the 2024 filing cycle will receive additional scrutiny and be reviewed as a priority in the 2025 filing cycle. Filers who did not complete the 2024 verification requirement will be included again in the verification process of the following filing cycle.

75. Following the review of all disclosure statements, a conflict of interest assessment of the filer's statement was conducted. From a total of 1,134 participants, 48 possible conflicts of interest were identified involving outside activities, financial activities or family relationships where relatives worked for the United Nations or an entity related to the United Nations. Possible conflicts of interest relating to outside activities constituted the majority of identified conflict, which appears to be consistent with the overall risks identified and managed under the United Nations financial disclosure programme over the years.

76. In addressing the identified possible conflicts of interest, the financial disclosure programme reviewer issued 48 recommendations to concerned filers. Of those, 40 were accepted and implemented by the end of the filing cycle. Four filers did not acknowledge the reviewer's recommendation by the time of submission of this report, and four recommendations were not implemented by the end of the filing cycle, resulting in an incomplete status. At the time of submission of this report, follow-up with those filers continues.

77. The review of the 2024 reporting period, commencing in March 2025, will again be launched in cooperation with the United Nations Secretariat Ethics Office, considering lessons learned from this first round of the programme.

F. Other activities

Audit Advisory Committee

78. The Director of the Ethics Office presented the 2023 annual report and 2024 work plan of the Ethics Office to the Audit Advisory Committee in March 2024. The Director also participated in two in-camera sessions with the Committee in July and December 2024, presenting the workplan and priorities for 2025.

IV. Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations

Ethics Panel of the United Nations

79. In 2024, the Director of the UNOPS Ethics Office continued participating in monthly meetings and ad hoc informal sessions of the Ethics Panel of the United Nations.

80. The Ethics Panel of the United Nations, established through ST/SGB/2007/11, comprises the heads of the ethics offices of the separately administered organs and programmes of the United Nations and the United Nations Secretariat Ethics Office and has nine members: the United Nations Secretariat Ethics Office (Chair), UNDP, UNFPA, the Office of the United Nations High Commissioner for Refugees, the United Nations Children's Fund, the United Nations Relief and Works Agency for Palestine Refugees in the Near East, the United Nations Entity for Gender Equality and the Empowerment of Women, the World Food Programme, and UNOPS. Seeking to ensure coherence, the Ethics Panel is mandated to establish a unified set of standards for its members and to consult on issues having system-wide implications.

81. Participation and membership in the Panel is a cornerstone of the independence of the UNOPS Ethics Office and its cohesion with the wider community of United Nations system ethics offices.

82. This participation continued to be strengthened by the Ethics Office throughout 2024. For example, in 2024 the Director of the Ethics Office served as the Alternate Chair of the Ethics Panel for a one-year term, tasked to conduct secondary reviews of no prima facie determinations in cases

of protection against retaliation issued by the Ethics Office of the United Nations Secretariat. As outlined above, the Director of the UNOPS Ethics Office issued seven determinations in respect of such requests.

83. Additionally, the Director of the Office participated in two working groups developing guidance documents for the Ethics Panel on “honours, decorations, favours, gifts or remuneration” and “outside activities”, and continued to streamline further ethics-related communications and outreach activities.

Ethics Network of Multilateral Organizations

84. The UNOPS Ethics Office is a member of the Ethics Network of Multilateral Organizations and participates in its annual conference. The Ethics Network comprises the ethics offices of over 50 multilateral organizations. It brings together senior professionals responsible for the ethics functions in multilateral intergovernmental organizations subject to international public law, in their official capacity. The Network strives to broaden the knowledge base of its members, enhance the professional capacity of their ethics functions, and promote good standards of practice and core responsibilities.

V. Conclusion

85. Following the initiation of a comprehensive UNOPS response plan in 2023, the Ethics Office continued in 2024 to focus on strengthening its role as a trusted and independent resource to promote ethical standards within its remit. The Office sought to do this by completing the reform processes related to the review of the whistle-blowing and speak-up processes and the development of the first UNOPS code of ethics. An additional focus was the delivery and strengthening of day-to-day operations and continued work related to training and awareness-raising.

86. In 2025, the Ethics Office is committed to contributing to a successful roll-out of the reform processes and continuing to establish coherent practices in line with United Nations standards. The Ethics Office stands ready to engage with all relevant internal and external stakeholders to continue to fortify a culture of ethics at UNOPS.
