

Upholding Our Values to Improve Our Workplace Culture

ETHICS AND BUSINESS CONDUCT ANNUAL REPORT 2021



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ABBREVIATIONS AND ACRONYMS

| | |
|--------------|---|
| AHC | Anti-Harassment Coordinator |
| ATV | Advisory, Training, and Values Unit of EBC |
| BIR | Business Integrity Review Unit of EBC |
| CII | Conference of International Investigators |
| CBR | IFC Compliance & Business Risk Unit |
| CEB | UN System Chief Executives Board for Coordination |
| CRW | Creating a Respectful and Harassment-Free Workplace |
| DEC | Development Economics Vice Presidency |
| DOI | Declaration of Interests |
| EAS | Ethics Awareness Session |
| EBC | Ethics and Business Conduct Department |
| ENMO | Ethics Network of Multilateral Organizations |
| GEF | Global Environment Facility |
| GPE | Global Partnership for Education |
| GIA | Group Internal Audit |
| HRDVP | Human Resources Vice Presidency |
| IBRD | International Bank for Reconstruction and Development |
| IDA | International Development Association |
| ICSID | International Centre for Settlement of Investment Disputes |
| IFC | International Finance Corporation |
| IJS | Internal Justice Services |
| ITAP | Independent Technical Assessment Panel in GPE |
| ITS | Information and Technology Solutions |
| MDCAO | Managing Director and World Bank Group Chief Administrative Officer |
| MIGA | Multilateral Investment Guarantee Agency |
| RWA | Respectful Workplace Advisor |
| UN | United Nations |
| WBG | World Bank Group |
| WFA | WBG Finance and Accounting |

FOREWORD



I would like to commend the Ethics and Business Conduct Department (EBC) for their achievements during an unprecedented year. This EBC fiscal year 2021 (FY21) Annual Report underscores the importance of applying the World Bank Group (WBG) Core Values—**impact, integrity, respect, teamwork, and innovation**—in our daily work, even and perhaps especially when faced with challenges like the ongoing pandemic. A few key initiatives are worth noting.

In FY21, EBC oversaw the WBG's adoption of a new Code of Ethics, which articulates what our Core Values mean in practice and focuses on the specific behaviors all WBG staff are expected to uphold to create a safe and healthy work environment. EBC subsequently developed a new mandatory e-learning on the Code of Ethics to provide insight on some of the common ethical issues that may arise in the workplace and guide staff on how to use the Code to guide their decision-making.

The special responsibility of managers and leaders to model the Core Values and foster safe spaces for staff is also emphasized in the new Code. Furthermore, this year EBC established a dedicated ethics onboarding program for newly appointed WBG senior leaders to ensure they are aware of their ethical responsibilities and set the right tone for their staff.

EBC expanded its ethics training and outreach, engaging over 9,000 WBG staff in Headquarters and in country offices during FY21. This has made a tangible impact in increasing awareness about the various

resources in EBC and other related services for staff to address workplace concerns. This awareness, in turn, helps to encourage staff to come forward and share their concerns, which is fundamental to promoting accountability in the institution. In FY21, EBC also made great efforts to prevent retaliation or perception of retaliation, as well as discrimination and racism, at the WBG.

Finally, I'd like to acknowledge EBC's continued work in implementing the recommendations in the WBG's 2019 Action Plan for Preventing and Addressing Sexual Harassment, which had over 70 initiatives including the creation of the Anti-Harassment Coordinator function. This role has addressed a gap in underreporting of situations related to harassment, sexual harassment, and inappropriate behavior. As a result of these initiatives the WBG has become a benchmark among international institutions for its approach in preventing and addressing harassment.

It is with deep appreciation that I congratulate the EBC team for their ongoing work and commitment to uphold ethical standards at the WBG and provide avenues for staff to seek advice and support to address workplace concerns, with the confidence that they will be treated with respect and integrity.

Shaolin Yang

Managing Director and
WBG Chief Administrative Officer
The World Bank Group

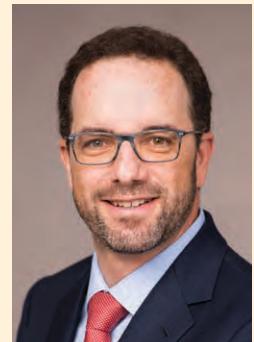
CHIEF ETHICS OFFICER'S MESSAGE

Independent and effective internal accountability mechanisms have never been more relevant to preserve the integrity and resilience of institutions such as the World Bank Group. These mechanisms are integral to instilling trust that there are safe spaces for staff to report and address their workplace concerns.

By continuing to increase awareness, understanding and commitment to our WBG Core Values among staff at all levels of the organization, the Ethics and Business Conduct Department (EBC) is leading the effort to support a work environment that is safe, respectful, and inclusive for all WBG staff. In this context, I am pleased to share this annual report, which details the initiatives and activities carried out by the ethics and compliance department of the Bank Group in fiscal year 2021.

EBC focused on the following strategic areas during fiscal year 2021:

- Establishing a new Code of Ethics for the World Bank Group, focused on the behaviors consistent with the values we uphold.
- Fostering a culture of safe speech and inclusion through training and communication to create a psychologically safe environment for all WBG staff to respectfully express their views without fear of reprisal.
- Ensuring senior leaders set the right tone and model the Core Values, with a dedicated onboarding program that articulates their ethical responsibilities as leaders and managers.
- Delivering real-time response to staff requests for advice about compliance with Staff Rules and ethical dilemmas.
- Increasing staff awareness around common ethical dilemmas by developing more impactful virtual training and tools.
- Modernizing training content and optimizing engagements with staff to make them more interactive and inclusive in the virtual environment.
- Ensuring accountability by conducting investigations of misconduct allegations with all necessary care and with the highest integrity.
- Fulfilling the implementation of the recommendations included in the *WBG Action Plan for Preventing and Addressing Sexual Harassment*.
- Strengthening collaborations with corporate services and institution-wide initiatives, contributing in particular to the discussions on COVID-19 vaccinations, home-based work and returning to the office.
- Performing root cause analysis on misconduct cases and situations where staff requested advice to identify emerging trends or risks and share lessons learned with key internal stakeholders.



We continue to be proactive in engaging the World Bank Group's global workforce. Overall, EBC reached more than 16,000

WBG staff during fiscal year 2021 through its various services and outreach.¹

As the institution prepares for a gradual return to office in fiscal year 2022, EBC will stay focused on embedding ethics in WBG culture and operations, by continuing to be a trusted resource in preventing and addressing misconduct and encouraging appropriate behavior consistent with our Core Values.

Our department constantly strives to better serve WBG staff and develop excellence through our processes and practices. We welcome your feedback on ways to improve and look forward to continuing our dialogue with staff and partners as we work together to tackle ethical and other relevant issues facing our organization. Please send any comments to ethics_helpline@worldbank.org.

Jorge Dajani

Chief Ethics Officer
The World Bank Group

¹ See Table 31, which details the breadth of EBC's activities and touchpoints with staff.

1 FOCUSING ON PREVENTION

One of the key pillars of EBC's current strategy is to step up prevention and mitigate risks by helping WBG staff understand and uphold behaviors consistent with the core values of the institution. Through its preventive services, EBC takes a proactive approach to addressing workplace issues or conflict.

CORE VALUES AND THE CODE OF ETHICS

The World Bank Group Code of Ethics (the "Code") was officially launched in September 2020, after an organization-wide consultation process to which all staff were invited to participate to help shape the document.

Based on the corporate Core Values of *impact, integrity, respect, teamwork, and innovation*, the "Code" describes in detail specific behaviors, actions, and mindset that align with these values, so that all WBG staff—from senior leadership to temporary employees—hold themselves accountable to the highest standards. Following good practices in the ethics field, this "values-based approach" is a departure from the WBG's former Code of Conduct, which focused on setting the minimum standards of behavior and actions.

Another key feature of this Code is that it spells out the special responsibilities of managers to model the values and create safe spaces for staff to express their views.

To increase awareness and understanding around the Code, EBC has planned a series of learning products for 2021, including:

- **E-learning for all staff:** The mandatory course was released in May 2021. It includes relevant scenarios that were developed based on staff input, and which focus on values-based decisions for each situation rather than on "right or wrong" or compliance with rules.
- **Values Conversation for Teams:** A 90-minute-long facilitated conversation tool for units and teams interested in using the Code as a guide to discuss how they define the values and behaviors they want



to promote for their specific work environment. Each team is expected to develop a type of "charter" based on their own input.

- **Leaders' Guide to the Code:** Developed with EBC's Anti-Harassment Coordinator (AHC) office, the guide provides a "check-list" of behaviors and approaches to increase self-awareness of leaders' responsibilities in upholding the Code.

CREATING AN ENVIRONMENT WHERE SAFE SPEECH CAN BE PRACTICED

EBC has continued to play a visible role in fostering a work environment where all WBG staff can respectfully express their ideas, beliefs, and concerns without fear of any form of reprisal or negative consequences. While the Bank Group has rules and mechanisms in place protecting staff against retaliation, promoting an organizational culture that is in line with the WBG core values—one that embraces diversity of views—will ensure a respectful and inclusive workplace where "safe speech" can thrive and is a key area of EBC's outreach in fiscal year 2021 through its training services, joint initiatives with other WBG units, and broader communications to all staff.

This was accomplished by increasing staff awareness of the new Code of Ethics, for example, which serves to promote and articulate ethical behaviors consistent with the core values.

Addressing racism and discrimination

EBC has actively supported and engaged with the World Bank Group Task Force on Racism, which was established in June 2020. The EBC Anti-Harassment Coordinator is a member of the Task Force Sounding Board and the EBC leadership team provides regular feedback on the recommendations proposed by the Task Force heretofore. In fiscal year 2021, EBC also produced a white paper for the Task Force, which outlined EBC's proposed contributions in addressing discrimination and racism at the Bank Group.

Any form of racism or discrimination goes against the core values of the WBG. The Chief Ethics Officer has been an outspoken advocate on this and in promoting a more inclusive work culture where all WBG staff can be true to their identity. In fiscal year 2021, he has used his internal Bank blog "Ethical Perspectives" to speak out against discrimination and on creating safe spaces and a healthy work environment. On December 3, 2020, he joined a panel with other WBG leadership to mark International Day of Persons with Disabilities during which he spoke of the Code of Ethics and managers' specific responsibility to model the core values to create a more disability inclusive Bank Group.

The Chief Ethics Officer has also established an ongoing dialogue with the LGBT+ groups of the WBG and has also clearly stated that discrimination on grounds of sexual orientation or gender identity is not acceptable at the WBG.

ETHICS ADVISORY AND COMPLIANCE

Throughout fiscal year 2021, EBC has continued to support the Bank Group's mission by upholding ethical leadership and fostering compliance with ethical best practices through its advisory services.

Increased activity and performance standards

The number of requests for advice has continued to increase, with 1,373 requests in fiscal year 2021. This represents a six percent increase compared to last fiscal year (1,291 requests), and a 30 percent increase when compared to fiscal year 2019 (from 1,053 queries).

Staff queries received responses within eight business hours on average. This is a key point to ensure effective compliance. Respondents to anonymous user surveys indicated a high degree of satisfaction with the timeliness of the service and the information provided—about 95 percent described EBC's advisory services as timely, providing effective and thorough guidance, and courteous.

In fiscal year 2021, EBC deployed specific efforts² towards IFC staff for them to access EBC services as frequently as IBRD staff do.

TABLE 1. ADVISORY REQUESTS BY INSTITUTION, FY21

| Institution | FY21 | |
|--------------|--------------|-------------|
| | Number | Percentage |
| IBRD | 784 | 57% |
| IFC | 294 | 21% |
| MIGA | 10 | 1% |
| GEF | 5 | 0.4% |
| Other | 280 | 20% |
| Total | 1,373 | 100% |

The most prevalent topics of inquiry remained consistent with prior years, with outside activities and employment (including employment after leaving the WBG and relationships with previous employers) remaining the highest category and comprising about half of all queries received.

EBC's Advisory, Training, and Values (ATV) team has reviewed over 10 cases this past year relating to non-compliance with personal legal obligations. To ensure that the WBG's privileges and immunities are not used to shield staff from their personal legal obligations, which include taxes, court-ordered payment of spousal and child support, and other court ordered payments, EBC has intervened when presented with a court order or request from a judicial/administrative authority that evidences a legal

obligation of a staff member. The ATV team has provided advice and guidance on the application of Staff Rules as they relate to staff members' rights and obligations in the context of family law proceedings. In addition, the ATV team has supported the Domestic Abuse Prevention Program team in compelling staff members to comply with their personal legal obligations in the context of domestic disputes.

As part of its practice to review the Staff Rules on a regular basis, EBC is working to clarify and streamline the rules related to outside activities and employment and strengthen the management of institutional risks related to outside positions undertaken in an official capacity by creating an institutional registry of such activities.

² These efforts include a dedicated senior EBC staff member responsible for ethics issues at the IFC and deepening collaboration with the IFC Compliance and Business Risk department (CBR).

TABLE 2. REQUESTS FOR ADVICE RECEIVED IN FY21 BY TOPIC AND COMPARISON WITH PREVIOUS YEARS

| Topic | FY17 | FY18 | FY19 | FY20 | FY21 |
|-----------------------------------|------------|------------|--------------|--------------|--------------|
| Outside activities and employment | 311 | 317 | 362 | 477 | 540 |
| Future or former employment | 103 | 94 | 115 | 156 | 136 |
| Close relatives/relationships | 112 | 129 | 121 | 117 | 91 |
| Vendor procurement | 60 | 95 | 110 | 91 | 110 |
| Public statements and disclosures | 40 | 63 | 51 | 58 | 85 |
| External services | 48 | 42 | 38 | 49 | 20 |
| Gifts, medals, and honors | 47 | 61 | 74 | 45 | 43 |
| Personal financial interests | 17 | 21 | 16 | 40 | 44 |
| Operational | 20 | 6 | 19 | 6 | 8 |
| Other | 88 | 97 | 147 | 252 | 296 |
| Total | 846 | 925 | 1,053 | 1,291 | 1,373 |

In about 60 percent of the cases, EBC was consulted by staff at level GF and above.

TABLE 3. ADVISORY REQUESTS IN FY21 BY GRADE LEVEL

| Grade | FY21 | |
|-------------------------------------|--------------|-------------|
| | Number | Percentage |
| GH+ | 215 | 16% |
| GG | 362 | 26% |
| GF | 228 | 17% |
| GE | 68 | 5% |
| GA-GD | 81 | 6% |
| ETC/Ts | 39 | 3% |
| UC-UA (STC/T) | 100 | 7% |
| Non-classified (external/anonymous) | 280 | 20% |
| Total | 1,373 | 100% |

Proportionally more queries emanate from headquarters (HQ) than from country offices.

TABLE 4. ADVISORY REQUESTS BY LOCATION (HQ/COUNTRY OFFICE)

| Location | FY21 | |
|-------------------------------------|--------------|-------------|
| | Number | Percentage |
| HQ | 647 | 47% |
| CO | 446 | 32% |
| Non-classified (external/anonymous) | 280 | 20% |
| Total | 1,373 | 100% |

Recent updates to Staff Rules

EBC spearheaded two important Staff Rule changes in fiscal year 2021.

The first pertains to the role of the Anti-Harassment Coordinator, which is now described in paragraph five of Staff Rule 3.00. A definition of sexual harassment was introduced in the rule at the same time. These changes fulfill commitments made in the *WBG Action Plan for Preventing and Addressing Sexual Harassment*.

The second is the revision of the Staff Rule on financial conflicts of interest and declarations of interests (Staff Rule 3.03). This was the first revision since the adoption of a system of declarations of interests over ten years ago, and it provided the opportunity to formalize some of the procedural improvements that were implemented as EBC's experience with the program grew. The revision also introduced explicitly a prohibition of business-related conflicts of interest: staff cannot have a substantial role in an operation or an activity of the WBG if they have financial interest, business or employment relationship and any personal or non-WBG professional involvement in that operation or activity. The rule also requires staff to disclose it to their manager and to EBC when they are aware that an immediate family member or a close relative is involved in that operation or activity.

The Principles of Staff Employment contain a general requirement for staff to avoid both perceived and actual conflicts of interest. Business-related conflicts of interest were previously addressed through this general provision. However, given the impact that such conflicts of interest may have on an operation, it was considered necessary to make the prohibition of business-related conflicts of interest more explicit. The rule was approved by the President of the WBG and came into force in August 2021.

EXPANDING THE DECLARATION OF INTERESTS PROGRAM

EBC administers the Declaration of Interests (DOI) Program on behalf of the World Bank Group.

Staff Declaration of Interests

The annual Staff Declaration of Interests Program requires approximately 5,000 staff members to submit a DOI. This is done via a confidential and secure web-based software application, which has been accredited by the WBG's Office of Information Security. Participants in the program include all staff members at grade levels GH and GI, as well as other staff members deemed to hold sensitive roles which present unique conflict of interest risk profiles. All staff members in the Integrity Vice Presidency, Ethics and Business Conduct Department, Corporate Procurement, and Office of Suspension and Debarment, regardless of grade level, are required to submit an annual DOI.

Once submitted to EBC, a team of highly trained and experienced analysts carefully review and analyze each DOI to identify actual or potential conflicts of interest. If any are detected, EBC then works closely with the staff member and their management team to implement appropriate safeguards to mitigate the risks posed by the conflicts of interest.

The process for administering the DOI program was not significantly impacted by the Coronavirus pandemic and maintained its program completion standards in a fully virtual environment.

In fiscal year 2020, EBC and IFC's senior management jointly reached a decision to expand the DOI program to all IFC staff members at grade levels GE to GG due to the heightened risk for conflicts of interest posed by IFC's work with the private sector. As a result of this expansion, the number of total program participants increased by 12 percent from the prior year. Additional resources were devoted to the program and all performance targets were achieved during fiscal year 2021. Notably, EBC successfully identified a significant number of conflict of interest risk areas that were only detected after the expansion of the DOI program.

TABLE 5. STAFF ANNUAL DOI PROGRAM, FY20-FY21

| Staff Annual DOI Program | FY20 | FY21 |
|---|--------------|--------------|
| Total filers | 4,567 | 5,138 |
| DOIs closed at initial review | 3,900 | 4,670 |
| DOIs that required further review | 667 | 468 |
| <i>Of which mitigation measures were required</i> | <i>319</i> | <i>270</i> |

Following on the success of the expansion of the DOI program with the IFC, the World Bank Treasury's senior management also decided to expand the DOI filing obligation to its staff members at grade levels GE to GG beginning with the 2021 DOI Program. At Treasury's request, EBC delivered tailored training to all affected staff members to help familiarize them with the DOI filing requirements and process.

The decision by IFC and Treasury to expand the DOI program not only contributed to good governance and industry best practices, but also resulted in the mitigation of potentially serious operational and compliance risks. Moreover, it reinforced the WBG's commitment to transparency and accountability while protecting the organization's reputation from risks posed by conflicts of interest.

In addition to the annual Staff DOI Program, EBC administers the Staff Onboarding DOI Program, which requires all individuals hired at, or promoted to, the GH or GI level, as well as staff at lower grade levels in specific units (e.g., Treasury) deemed to present unique risks for financial conflicts of interest, to complete a DOI within 30 days from the date of their onboarding. In fiscal year 2021, 65 staff members were required to complete an onboarding DOI.

Following the completion of EBC's review and analysis of the DOIs, there were 98 cases in which actual or perceived conflicts of interest were identified in the 2021 DOI Program. EBC resolved these conflicts of interest by implementing several mitigation measures.

TABLE 6. DECLARATION OF INTERESTS RESOLUTION, FY20-FY21

| Mitigation Measure | FY20 | FY21 |
|--|------|------|
| Requested additional information from staff member | 194 | 163 |
| Provided advice and guidance to staff member | 97 | 71 |
| Other | 12 | 9 |
| Advised to seek manager/Chief Ethics Officer approval | 7 | 12 |
| Required disclosure to manager | 6 | 9 |
| Required divestiture of personal holding | 2 | 2 |
| Required disclosure to manager and divesture of personal holding | 0 | 1 |
| Prohibited any transactions in personal holding unless approved by EBC | 1 | 3 |

Senior Leaders Declaration of Interests

EBC implements and manages the Senior Leaders DOI Program as distinct from the WBG Staff DOI Program. For the Senior Leaders DOI Program, filers comprise the "top 50" members of the WBG

leadership team (i.e., those at grade levels GJ and above, also including the WBG Chief Ethics Officer).

Following best practices in organizational governance and transparency, the program requires publication of certain financial assets, outside positions, and interests (in the public portion of

the DOI form). Public disclosure of this information demonstrates to WBG stakeholders that, in the discharge of their official duties and responsibilities, WBG leadership is not, and does not appear to be, influenced by any consideration associated with private interests. The annual exercise requires active WBG senior leaders by the end of the former calendar year, to file a DOI reflective of their financial interests and outside affairs during that previous calendar year. Likewise, within the DOI program, the onboarding of senior leaders who are new entrants to the Bank Group, mandates them to file an onboarding DOI reporting on interest and activities during the WBG onboarding year.

Implementation of the annual Senior Leaders DOI Program was completed ahead of schedule in March 2021—a reflection of EBC’s increased responsiveness and commitment by WBG leadership to transparency and accountability provided by the financial disclosures. Under the program, EBC achieved full compliance of 48 senior leaders. Since March 9, 2021, the public forms under the program have been available on the World Bank external webpage [“Public Financial Disclosure for World Bank Group Leadership.”](#)

Ongoing collaboration with the Global Environment Facility

Continuing its collaboration and partnership with the Global Environment Facility (GEF), EBC launched the 2020 GEF DOI exercise on August 15, 2020. The GEF DOI Program was applicable to 109 “covered individuals,” including council members, alternate council members or advisers of the GEF Council, who are official government representatives of the 184 countries and 32 constituencies that form the GEF.

This cycle marks the fourth year since 2017 in which EBC functioned as Ethics Officer to the Ethics Committee of the GEF Council (addressing consultations in that capacity) and implemented its annual DOI program. The reporting obligations under the program refer to the period from July 1, 2019

to June 30, 2020, with DOI form submissions due in September 2020. The program was completed by January 2021. EBC did not find any conflicts of interest from the review process.

Beyond implementation of the DOI program, EBC also worked with the GEF to operationalize application of the GEF *Policy on Ethics and Conflict of Interest* and to ensure, for the second year, a sound composition of the GEF Council’s Ethics Committee (with a new Chair and Members). EBC participated in the first annual meeting for the GEF Council’s Ethics Committee.

New collaboration with GPE

The Global Partnership for Education (GPE) has created an Independent Technical Assessment Panel (ITAP) composed of about 15 experts. In 2019, EBC had appointed an Ethics Officer who advises the GPE Board; the activities of the Ethics Officer have been extended to reviewing the DOI forms and potential conflict of interest concerns of ITAP members.

Supporting compliance at the IFC

In fiscal year 2021, EBC’s ATV team strengthened its collaboration with the IFC Compliance & Business Risk (CBR) team, working closely on special projects and initiatives that intersect both teams’ functions. In addition to jointly reviewing business-related personal conflicts of interest cases that arise in IFC operations, the ATV and CBR teams met quarterly to discuss general trends identified in advisory queries and brief each other on topical matters of mutual interest. In fiscal year 2020, ATV and CBR worked on proposals for necessary Staff Rule amendments, collaborated on cross-cutting e-learning tools, awareness-raising initiatives, and streamlining the framework for approving outside board positions.

Visual communication to illustrate compliance issues

When providing advice on ethical issues, EBC helps staff assess whether their personal and professional activities are in compliance with World Bank Group rules and processes. To this end, visual communication plays a growing role in EBC's outreach efforts to increase staff awareness of compliance related topics. In fiscal year 2021, EBC developed a series of infographics to help staff identify potential conflicts of interest and navigate common ethical issues more effectively. These topics include:

- Outside Activities and Employment
- Future or Former Employment
- Close Relatives/Relationships
- Intimate Relationships
- Public Statements and Disclosures
- Gifts
- Vendor Procurement
- Personal Financial Interests
- Political Activities
- Operational Conflicts of Interest in Projects

FIGURE 1. INFOGRAPHIC PROVIDING GENERAL GUIDANCE ON CONFLICT OF INTEREST ISSUES

COMPLIANCE ADVICE & GUIDANCE

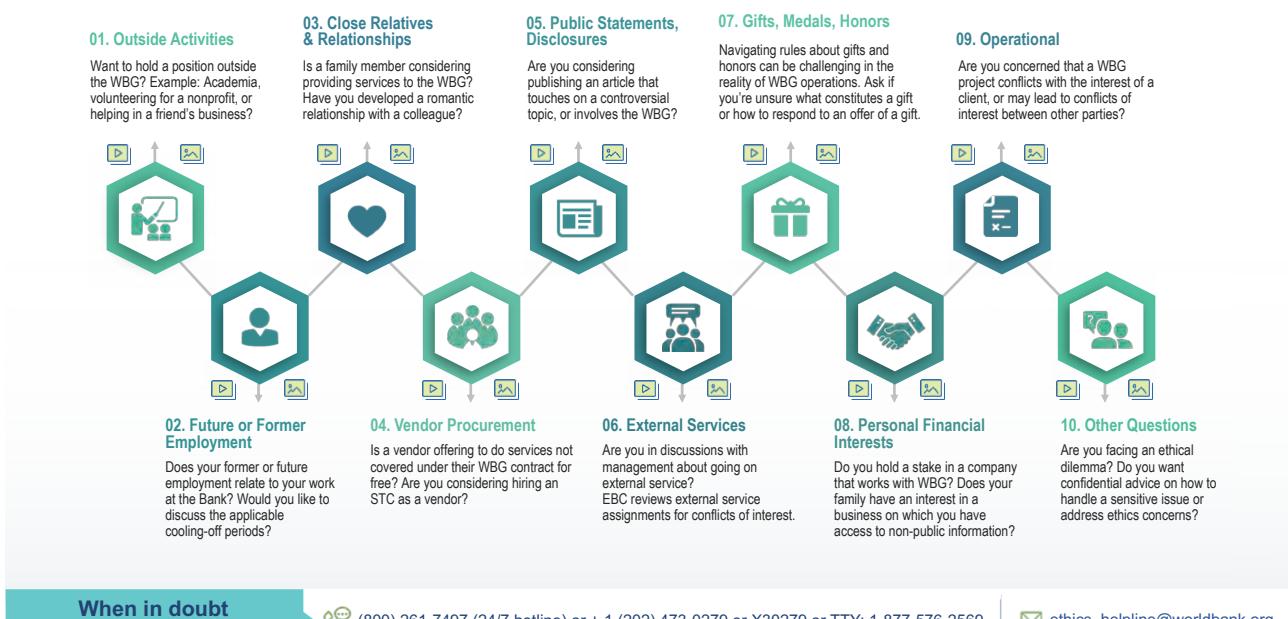


FIGURE 2. INFOGRAPHIC ON OUTSIDE ACTIVITIES AND EMPLOYMENT



FIGURE 3. INFOGRAPHIC ON CLOSE RELATIVES AND RELATIONSHIPS

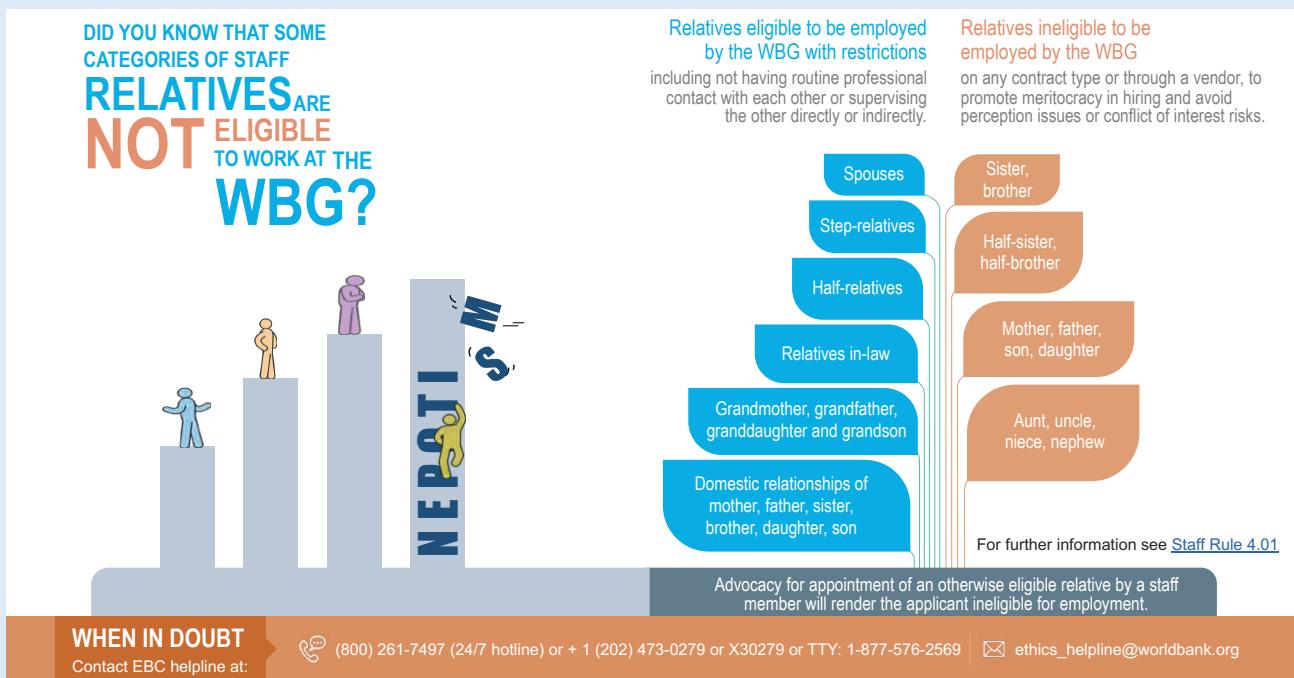


FIGURE 4. INFOGRAPHIC ON FUTURE OR FORMER EMPLOYMENT

FUTURE AND FORMER EMPLOYMENT

The following policies and cooling-off periods are intended to avoid conflicts of interest between former and future employment of staff and their work at the World Bank Group.



ETHICS TRAINING AND AWARENESS

EBC's training offerings continue to focus on promoting ethical behaviors aligned with the WBG's core values and creating a safe and respectful workplace for all staff. In addition, the training raises awareness of conflict of interest situations that staff may encounter during their WBG employment.

Expanding reach to global staff

In fiscal year 2021, EBC trained over 9,000 staff worldwide. Recognizing the importance of providing timely and relevant learning opportunities to our global staff, EBC has been very engaged in supporting country office colleagues in delivering a virtual curriculum of ethics training. Staff were reached through various programs described in the following table.

TABLE 7. TRAINING AND OUTREACH FOR WBG STAFF, FY21

| | Number of staff |
|--|------------------------|
| Creating a Respectful and Harassment-free Workplace | 3,569 |
| Ethics Awareness | 1,968 |
| New staff onboarding | 1,353 |
| Townhall outreach | 1,138 |
| Ethics-at-Work | 944 |
| Preventing and Addressing Harassment and Sexual Harassment, specific training for Managers | 223 |
| Ethics & Compliance for Young Professionals | 115 |
| Total Staff Reached | 9,310 |

TABLE 8. COUNTRY OFFICE ENGAGEMENT, FY21

| World Bank Region | Country Offices |
|---------------------------------------|---|
| Eastern and Southern Africa (AFE) | South Africa |
| Western and Central Africa (AFW) | Benin, Côte d'Ivoire, Ghana, Liberia, and Sierra Leone |
| East Asia and the Pacific (EAP) | China, Indonesia, Korea, Malaysia, Philippines, Singapore, Thailand, Timor-Leste, and Vietnam |
| Europe and Central Asia (ECA) | Belarus, Moldova, and Ukraine |
| Latin America and the Caribbean (LCR) | Colombia and Panama |
| Middle East and North Africa (MNA) | Algeria, Libya, Malta, Morocco, and Tunisia |
| South Asia (SAR) | Afghanistan, Bangladesh, Bhutan, India, Nepal, Pakistan, and Sri Lanka |

With the WBG Core Values and Code of Ethics as guiding frameworks, this past year EBC successfully engaged with staff situated in 32 country office locales. These staff received dedicated training sessions from EBC.

EBC in Chennai

EBC's continued presence in the Chennai office through its senior ethics officer has helped to deliver a wide range of training and outreach activities in Chennai as well as World Bank offices in the East Asia and South Asia regions such as Sri Lanka, Maldives, Bhutan, Beijing, Kabul, Vietnam, New Delhi, Mumbai, Singapore, Kathmandu, Dhaka, Bangkok, and Islamabad.

In the past year, EBC engaged with around 700 staff in the Chennai office through various sessions such as facilitated conversations on *Creating a Respectful and Harassment-Free Workplace*, *Ethics Awareness*, and corporate onboarding sessions.

To promote and help operationalize the WBG core values, EBC customized and shared regular communication mailers with the Chennai office staff on the core values. A similar communication mailer focusing on the core value of *integrity* also was shared with IFC.

EBC partnered with the Shared Services Committee to facilitate a discussion on the "Chennai

Post-pandemic Work Force." EBC along with HR and the Chennai center manager regularly met with the Chennai office Staff Association to discuss staff issues and concerns, if any, and how best to address or resolve them.

Enhanced ethical advisory support was made available to staff in East Asia and South Asia country offices by providing efficient guidance and advice on various conflict of interest and declaration of interest queries.

Ethics training for the IFC

In fiscal year 2021, *Ethics Awareness* training was delivered to all new staff joining the IFC, who were given priority for this training because they had not had the opportunity to work physically from IFC offices and interact with colleagues and supervisors in person due to the pandemic lockdown. This was identified as a relevant risk. Consequently, EBC held 31 *Ethics Awareness* sessions for 554 IFC staff and in total, EBC had 1,663 IFC participants in its training sessions in fiscal year 2021. Beyond new staff, the training was also rolled out to staff in IFC offices located in Colombia, India (Mumbai and New Delhi), Bangladesh, Nepal, Bhutan, Panama, Singapore, Ukraine, and Belarus.

Around 174 staff from IFC's Corporate Budget and Business Administration Department (CBA) received

Creating a Respectful and Harassment-Free Workplace training.

EBC also facilitated *Creating a Respectful Workplace: A Conversation with Managers* with about 128 IFC managers from the leadership teams of CBA, Business Risk and Compliance Department (CBR), Latin America and Caribbean &

Europe and Central Asia Regions, and Middle East and Africa Region. EBC also partnered with IFC Human Resources to deliver a presentation on the WBG core values at four sessions of IFC Inclusive Workplace Onboarding for new staff.

Overall, IFC staff benefited from the following training programs:

TABLE 9. IFC TRAINING AND OUTREACH, FY21

| | Number of staff |
|--|------------------------|
| New IFC staff engagement | 797 |
| Creating a Respectful Workplace | 224 |
| Ethics Awareness | 514 |
| Harassment: A Conversation with Managers | 128 |
| Total staff trained | 1,663 |

In addition, some IFC staff participated in Bank Group-wide EBC events such as the Ethics-at-Work Learning sessions.

Adapting to the virtual environment

EBC adapted rapidly to the virtual work environment to provide an optimal learning experience for WBG staff. Cognizant of competing demands on participants' time and attention, the ATV team employed a few strategies, such as reducing the duration of training sessions. Training facilitators also deployed new tools to address units' specific needs during each phase of training. For example, a survey was administered to units before receiving training to adapt and deliver content that aligned with topics units identified as a priority. During

training sessions, facilitators deployed instantaneous and anonymized surveys to engage staff in real-time discussions about ethics-related workplace issues, including potential conflicts of interest. After training was delivered, EBC conducted post-engagement surveys to gain feedback on the quality of the training sessions and follow-up with unit leaders for additional engagements.

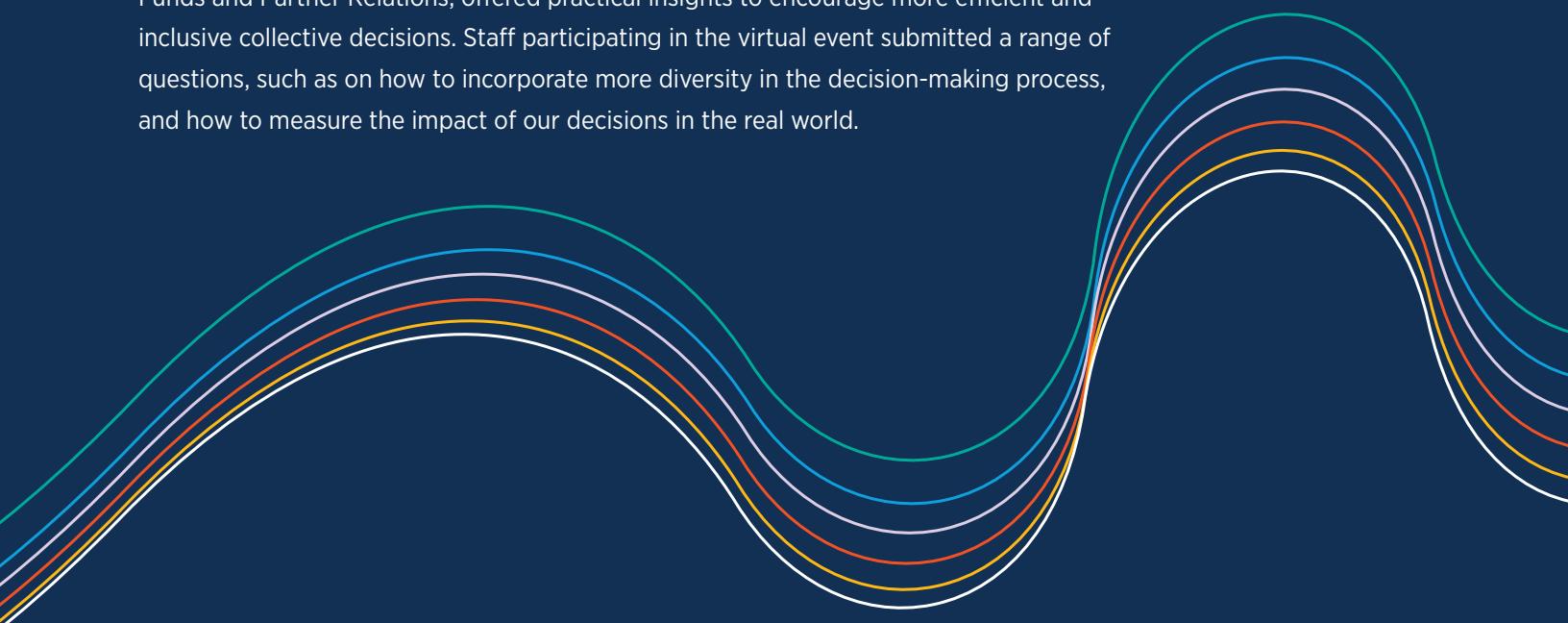
EBC also strategically redesigned and developed visual materials to ensure effective online learning experiences. Through thoughtful development, placement and use of videos and infographics, trainers could provide a dynamic virtual experience that mutually supported the facilitators' presentation styles and units' learning needs.

ETHICS-AT-WORK LEARNING SERIES

EBC established the Ethics-at-Work Learning Series in 2013, providing staff a regular forum and opportunity to interact with and learn from external speakers who are leading experts in their fields about the various ways integrity and ethics contribute to our work.

On December 8, 2020, EBC hosted its first ever virtual session for Ethics-at-Work with the discussion focusing on how home-based work is changing the office environment. Business psychologist and author Tomas Chamorro-Premuzic provided insights on remote work across various industries and organizations. The over 550 WBG staff who participated in the session heard from a WBG panel that included Tracy Hart, Senior Environmental Specialist and Staff Association Executive Committee Member; Safaa El Tayeb El-Kogali, Education Practice Manager for Eastern and Southern Africa; and Seynabou Sakho, Director of Strategy and Operations in the Latin America and Caribbean region. Panelists shared their perspectives and good practice advice on home-based work, highlighting the importance of respecting others' personal boundaries, creating safe spaces for staff to connect, showing empathy for colleagues, and facilitating inclusive conversations.

The June 3, 2021 learning session featured a discussion with decision scientist Julia Minson, which explored the challenges of making collective decisions and its impact on teamwork—a World Bank Group core value. “How we collaborate in making decisions is key to the achievement of our mission,” said Chief Ethics Officer Jorge Dajani. Jeehan Abdul Ghaffar, Senior Advisor to Executive Director (EDS11), reflected on her experience working in teams, including at the Board level, while Dirk Reinermann, Director of Trust Funds and Partner Relations, offered practical insights to encourage more efficient and inclusive collective decisions. Staff participating in the virtual event submitted a range of questions, such as on how to incorporate more diversity in the decision-making process, and how to measure the impact of our decisions in the real world.



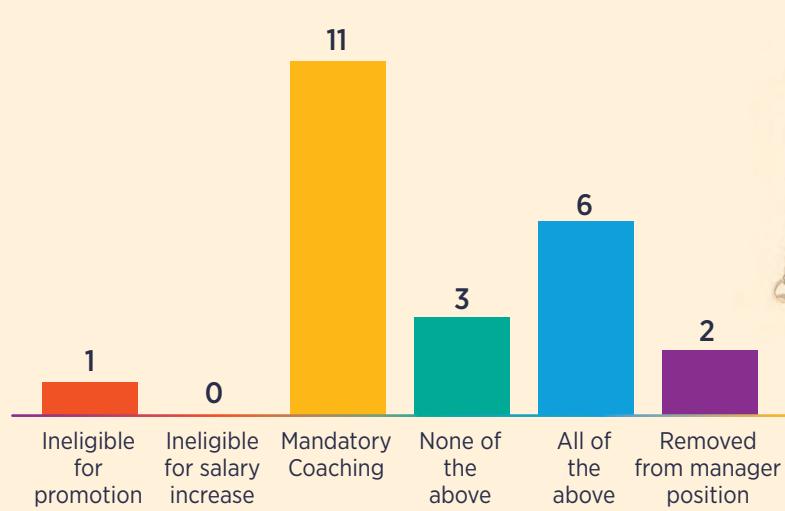
**FIGURE 5. EXAMPLE OF PRE-ENGAGEMENT SURVEY
TO PRIORITIZE A UNIT'S TOPICS OF INTEREST**

What are you interested in learning more about EBC?



**FIGURE 6. VISUAL OF (ANONYMIZED) INSTANT RESULTS
TO A SAMPLE POLLING QUESTION**

What do you think happened to the Manager?



Developing new content

In addition to the new learning products developed to increase awareness on the Core Values and Code of Ethics, EBC launched a suite of nine videos in fiscal year 2021 to help WBG staff better understand the Staff Rules and mitigate potential risks to the institution. The three-minute videos provide staff a self-paced option to explore common ethical issues they may encounter in the workplace. These include videos on:



- [**1. Respecting Our G5 Employees**](#)
- [**2. Political Activities, Public Statements, and Social Media**](#)
- [**3. Policies Related to Outside Employment**](#)
- [**4. Close Relatives and WBG Employment**](#)
- [**5. Appropriate Use of UNLP**](#)
- [**6. Maintaining Integrity with Our Vendors**](#)
- [**7. Work-Related Gifts and Benefits**](#)
- [**8. Reporting Requirements of Intimate Relationships**](#)
- [**9. Support for Dealing with Domestic Violence**](#)

The videos in this series underscore the importance of a values-based organizational culture, founded on the WBG Code of Ethics and Core Values, and staying in compliance with our Staff Rules. Staff around the world have relied on our Staff Rules for practical guidance to help them navigate through unforeseeable challenges that have impacted our work, especially through the pandemic.

EBC is also adapting to client requests by developing additional e-learning content that addresses racism and discrimination. By incorporating these topics in EBC's training, units could transparently discuss how various micro-aggressive behaviors may impact the workplace and their roles in fostering an ethical and values-based culture.

The nature and quality of EBC trainings

In fiscal year 2021, EBC delivered virtual training and outreach activities for WBG staff across the globe on a wide range of topics including our core values, managing conflicts of interest, or preventing and addressing harassment and sexual harassment, among others.

EBC's most requested training offerings were: *Creating a Respectful and Harassment-Free Workplace (CRW)*, *Ethics Awareness Session (EAS)*, and *Conversation with Managers* on managing harassment and sexual harassment at the workplace. In fiscal year 2021, *Ethics Awareness* and *Creating a Respectful and Harassment-Free Workplace* consistently ranked as two of the top five staff learning courses in terms of attendance at the Bank.

Creating a Respectful and Harassment-Free Workplace (CRW) is a 2.5-hour facilitator-led conversation with staff designed to help participants understand what harassment is versus inappropriate behavior, how the WBG has addressed real situations, learn about bystander intervention options and new resources available to staff such as the Anti-Harassment Coordinator role. To encourage better participation and interaction, EBC uses a real-time anonymous voting tool during these sessions and anonymized real cases to discuss WBG resources against inappropriate behaviors, harassment, and sexual harassment. For some country offices, EBC also participated in staff meetings and provided an overview about EBC training products prior to the upcoming country office engagement.

An Ethics Awareness Session (EAS) is a 1–1.5-hour dialogue on our core values, understanding our corporate responsibilities and assisting staff with navigating potential dilemmas regarding conflicts of interest. In these sessions, EBC also uses real case scenarios and sanitized examples to discuss topics such as outside employment, restrictions depending on contract type, appropriate use of social media, participation in political activities, proper use of WBG resources, etc. These conversations encourage staff members to better understand conflict of

interest situations, respond appropriately to ethical dilemmas, and seek support from EBC as needed.

These sessions are delivered to all new WBG staff as part of the virtual corporate onboarding. They are also provided based on the needs and interests of staff across various regions and units.

A Conversation with Managers on Managing Harassment and Sexual Harassment at the Workplace is a two-hour facilitated conversation designed to assist managers, and those who may act with “manager” authority, on how to handle situations related to “gray area” behavior that may not rise to the level of harassment or sexual harassment but still are not appropriate in the work context.

It provides information on the manager’s role, responsibilities, and obligations, resources available to assist managers, information on EBC’s misconduct review process, and informal sharing of best

practices and strategies managers may have seen. As managers have an additional responsibility in fostering a respectful workplace, these sessions help them to set the right tone, create a culture of respect, prevent retaliation or perception of retaliation, promote transparency and lead by example.

EBC regularly collects quantitative and qualitative feedback from training participants after every engagement. Figure 7 below provides a snapshot of a few of the comments EBC has received from participants this past fiscal year. They indicate an appreciation for using anonymized real cases and sharing with staff the outcomes of misconduct investigations. More importantly, they demonstrate EBC’s impact in creating better awareness among staff members on available resources and enhancing trust and confidence of the staff in EBC and other resources of the Internal Justice Services (IJS).

FIGURE 7. SAMPLE OF ANONYMOUS COMMENTS RECEIVED FROM PARTICIPANTS TRAINED IN FY21



ENSURING ACCOUNTABILITY

The Business Integrity Review (BIR) unit within EBC plays an instrumental role in ensuring that staff members adhere to the highest ethical standards in the performance of their duties with respect to the World Bank Group. Failure to adhere to the Bank Group's core values, principles of employment and staff rules undermines the organization's effectiveness and erodes trust with staff, our partners, and clients. By conducting investigations of misconduct allegations with the highest integrity in an independent, transparent, and impartial manner, BIR enables the institution to hold those staff members that commit misconduct accountable.

INVESTIGATING STAFF MISCONDUCT

BIR is responsible for receiving and investigating allegations of staff misconduct from any source inside or outside the Bank Group. Allegations of misconduct can be reported through many available sources, including through an internet web page,

email to a dedicated email address or to EBC staff, a 24/7 hotline administered by a third party, or in-person contacts (phone or walk-ins). Reports also can be anonymous.

Upon receiving a report of misconduct, BIR ascertains and verifies facts that fall within its mandate under Staff Rule 3.00. Where applicable, it creates an accurate and objective evidentiary record for the Human Resources Vice President (HRDVP) to make a finding of misconduct and impose disciplinary sanctions. BIR carries out its work in line with well established procedures that adhere to international best



practices that EBC contributes to establishing, such as the principles established by the Conference of International Investigators.

In fiscal year 2021, the BIR team conducted all investigative activity remotely due to the home-based work (HBW) restrictions placed on staff because of the Coronavirus pandemic. These circumstances brought unique challenges, including scheduling and conducting remote interviews, building trust and rapport with interviewees, and gathering and obtaining evidence such as documents, computers and phones. In addition to these

challenges, opportunities also arose from HBW, such as the improvement and strengthening of team culture, communications, protocols and learning and development.

Investigative activities

Table 10 below summarizes the investigative activity during fiscal year 2021. It compares the data with the figures from last fiscal year by the four stages of an investigation: i) intake and assessment; ii) preliminary inquiry; iii) investigation; and iv) report.

TABLE 10. HOW EBC MANAGED INVESTIGATION ALLEGATIONS RECEIVED IN FY20 AND FY21

| | FY20 | FY21 |
|--|------------|------------|
| Total Number of Allegations Processed³ in FY21 | 223 | 162 |
| Brought forward from previous year (FY20) | 22 | 21 |
| Reported in FY21 | 201 | 141 |
| | | |
| Total Number of Allegations Closed in FY21 | 202 | 122 |
| Closed at intake | 106 | 73 |
| Closed during preliminary inquiry | 74 | 29 |
| Closed during investigation | 9 | 9 |
| Reports to HRDVP | 13 | 11 |
| Open cases (carry over to FY22) | 21 | 40 |

The number of cases closed in the early stages of the review (intake or preliminary review) was sharply reduced this year, in large part because the AHC now addresses many of such cases, while the number of reports provided to the HRDVP for decision has remained comparable. This shows that the investigation work is now prioritized on cases of misconduct or those most appropriately handled through formal investigation rather than cases better addressed informally or through other internal mechanisms.

I. Intake and Assessment

In fiscal year 2021, BIR received 121 allegations of misconduct unrelated to harassment, sexual

harassment, and sexual exploitation and abuse. This represents a 13 percent increase over the 107 similar allegations received in fiscal year 2020. BIR also received 16 allegations of harassment, three allegations of sexual harassment and one allegation of sexual exploitation and abuse. EBC received 148 allegations and concerns of harassment and sexual harassment in fiscal year 2021, of which 12 cases were addressed by both the AHC and BIR.

As discussed in more detail in the Special Report on Harassment and Sexual Harassment, the AHC is now the first point of contact in EBC for staff seeking to address situations involving harassment, sexual harassment, and inappropriate behaviors.

³ “Processed” refers to all cases EBC’s BIR team worked on during fiscal year 2021 (including carry over cases from fiscal year 2020, new allegations received in fiscal year 2021, and cases that remained open on July 1, 2021).

In fiscal year 2021, the BIR Intake Coordinator led a working group comprised of members of ATV and the AHC to enhance, clarify and streamline EBC's intake process. The working group memorialized the intake process in an internal guideline. This contributed to increased consistency, transparency, and efficiency during this important triage stage of EBC's investigative, advisory and anti-harassment

activities. As a result of more effective triage and pre-screening process, the share of allegations closed at intake has increased from 52 percent of the total in fiscal year 2020 to 60 percent of the total in fiscal year 2021.

The types of allegations received have varied compared to previous years.

TABLE 11. ALLEGATIONS OF MISCONDUCT AND INAPPROPRIATE BEHAVIORS RECEIVED BY EBC'S BUSINESS INTEGRITY REVIEW (BIR) AND ANTI-HARASSMENT COORDINATOR (AHC) BY CATEGORY, FY17-FY21

| Allegations Received by Category | FY17 | FY18 | FY19 | FY20 | FY21 |
|----------------------------------|------------|------------|------------|------------------|-------------------|
| Abuse of authority | 31 | 34 | 22 | 9 | 17 |
| Discrimination | 7 | 7 | 4 | 2 | 14 |
| G5 domestic | 9 | 4 | 3 | 2 | 0 |
| Harassment | 60 | 79 | 83 | AHC 60 BIR 71 | AHC 102 BIR 16 |
| Misuse of resources | 21 | 18 | 15 | 20 | 25 |
| Non-compliance with Staff Rules | 60 | 44 | 39 | 49 | 57 |
| Personal legal obligation | 18 | 20 | 18 | 12 | 1 |
| Retaliation | 11 | 11 | 10 | 13 | 7 |
| Sexual exploitation and abuse | 0 | 0 | 2 | 5 | 1 |
| Sexual harassment | 11 | 35 | 28 | AHC 20 BIR 18 | AHC 26 BIR 3 |
| | | | | AHC 80 | AHC 128 |
| | | | | BIR 201 | BIR 141 |
| Total | 228 | 252 | 224 | 281 | 269 |

TABLE 12. ALLEGATIONS RECEIVED BY CATEGORY AS A PERCENTAGE OF THE TOTAL, FY17-FY21

| Allegations Received by Category | FY17 | FY18 | FY19 | FY20 | FY21 |
|----------------------------------|------|------|------|------|------|
| Abuse of authority | 14% | 13% | 10% | 3% | 6% |
| Discrimination | 3% | 3% | 2% | 1% | 5% |
| G5 domestic | 4% | 2% | 1% | 1% | 0% |
| Harassment | 26% | 31% | 37% | 47% | 44% |
| Misuse of resources | 9% | 7% | 7% | 7% | 9% |
| Non-compliance with Staff Rules | 26% | 17% | 17% | 17% | 21% |
| Personal legal obligation | 8% | 8% | 8% | 5% | 0.4% |
| Retaliation | 5% | 4% | 4% | 2% | 3% |
| Sexual exploitation and abuse | 0% | 0% | 1% | 14% | 0.4% |
| Sexual harassment | 5% | 14% | 13% | 9% | 11% |

TABLE 13. DISCRIMINATION ALLEGATIONS RECEIVED, FY16–FY21

| | FY16 | FY17 | FY18 | FY19 | FY20 | FY21 | Total |
|--------------------|----------|----------|----------|----------|----------|-----------|-----------|
| Age | 1 | | 1 | | | 1 | 3 |
| Disability | 2 | | | 2 | | 1 | 5 |
| Gender | 2 | 1 | 2 | | | 1 | 6 |
| Health | 1 | | | | | | 1 |
| Nationality | | 2 | 2 | 1 | 2 | 5 | 12 |
| Racial | 1 | 3 | 2 | 2 | 2 | 8 | 18 |
| Religious/creed | | 1 | | | | | 1 |
| Sexual orientation | 1 | | | | | | 1 |
| Total | 8 | 7 | 7 | 5 | 4 | 16 | 47 |

Over 10 percent of allegations of inappropriate behaviors or misconduct were connected to situations involving sexual harassment. Overall, allegations related to situations involving harassment or sexual harassment represented 55 percent of overall allegations received by EBC. The allegations of misconduct received focused, for 30 percent of cases, on misuse of resources and non-compliance with Staff Rules. The allegations of discrimination⁴ were at their highest level in five years, with more allegations of discrimination based on nationality or race.

In fiscal year 2021, BIR received 20 percent of the allegations from managerial-grade staff (GH and above). This is higher than their share of the overall WBG staff population and reflects the fact that managers have an obligation to report misconduct (staff are encouraged to do so). More than a third of the cases were reported anonymously or by external parties. This helps explain, at least in part, the fact that only eight allegations were received from short-term consultants (STCs).

TABLE 14. ALLEGATIONS OF MISCONDUCT RECEIVED BY REPORTER GRADE, FY21⁵

| Grade of Reporter | Number of Allegations | Percentage of Total |
|-------------------|-----------------------|---------------------|
| GA | 2 | 1% |
| GB | 0 | 0% |
| GC | 2 | 1% |
| GD | 3 | 2% |
| GE | 7 | 5% |
| GF | 17 | 12% |
| GG | 20 | 14% |
| GH | 18 | 13% |
| GI | 5 | 4% |
| GJ | 4 | 3% |
| STC | 8 | 6% |
| ETC | 3 | 2% |
| Anonymous | 34 | 24% |
| External | 18 | 13% |
| Total | 141 | |

⁴ In two cases, discrimination was a secondary allegation to other categories of misconduct allegations that the reporters brought to EBC.

⁵ This excludes the allegations of inappropriate behaviors connected to sexual harassment and harassment addressed by the AHC and presented subsequently.

TABLE 15. ALLEGATIONS OF MISCONDUCT RECEIVED FROM STCs, FY21⁶

| Misconduct Category | Number of Allegations |
|---------------------------------|-----------------------|
| Abuse of authority | 1 |
| Misuse of resources | 0 |
| Non-compliance with Staff Rules | 5 |
| Harassment | 1 |
| Retaliation | 1 |
| Sexual harassment | 0 |
| Total | 8 |

II. Preliminary inquiry

If an allegation of misconduct is within BIR's mandate and there is sufficient evidence to pursue the matter responsibly, then the case is assigned to an investigation team for purposes of conducting a preliminary inquiry. The purpose of the preliminary inquiry stage is to determine whether the behavior, as alleged, would constitute misconduct under Staff Rule 3.00. During the preliminary inquiry, BIR also assesses whether the allegation is credible and verifiable. The investigation team will conduct interviews with witnesses and obtain and review documents. During fiscal year 2021, BIR conducted 53 preliminary inquiries.

III. Investigation

At the conclusion of the preliminary inquiry stage, if BIR determines that an investigation is warranted, it will notify the staff member who is the subject of the investigation by providing him/her with a Notice of Alleged Misconduct. An investigation enables BIR to establish whether there is sufficient and credible evidence that misconduct occurred. BIR will interview the subject staff member to hear his/her side of the story, interview additional witnesses, and review relevant documentation. If, at the end of an investigation, BIR determines that there is insufficient evidence, BIR documents such findings, closes the case, and notifies the reporter. If the investigation indicates that misconduct may have occurred, BIR

provides the staff member whose conduct is at issue with a draft report of BIR's findings, presenting both inculpatory and exculpatory evidence, and recommendations to HRDVP.

In fiscal year 2021, BIR conducted 23 investigations of which nine were closed at the investigation stage, 11 resulted in a report of misconduct, and three remained open at the end of the fiscal year (i.e., ongoing cases carried over to fiscal year 2022).

IV. Report

Of the 23 investigations conducted, EBC substantiated allegations in 11 cases. BIR carried over 40 cases for review in fiscal year 2022; these are at various stages of the review process.

Table 16 reflects a breakdown of the 11 matters that resulted in a report to HRDVP.

Of the 11 cases that resulted in a report, the average processing time was 276 days, with 90 days being the lowest (sexual harassment case) and 384 days being the highest (harassment case). In fiscal year 2020, the average duration for completing the 13 investigations that resulted in a report was 227 days, with five cases within a time of 100–160 days and five cases within 199–246 days.

However, most misconduct review cases were closed much earlier than those necessitating a report to the HRDVP. For cases that were closed at

6 This excludes the allegations of inappropriate behaviors connected to sexual harassment and harassment addressed by the AHC and presented subsequently.

TABLE 16. ALLEGATIONS OF MISCONDUCT SUBSTANTIATED BY EBC THAT RESULTED IN A REPORT TO HRDVP, FY18-FY21

| Cases | FY18 | FY19 | FY20 | FY21 |
|---------------------------------|-----------|-----------|-----------|-----------|
| Abuse of authority | 2 | 0 | 0 | 0 |
| Discrimination | 0 | 0 | 0 | 0 |
| G-5 domestic | 2 | 0 | 0 | 0 |
| Harassment | 7 | 1 | 1 | 1 |
| Misuse of resources | 1 | 4 | 4 | 6 |
| Non-compliance with Staff Rules | 3 | 7 | 2 | 2 |
| Personal legal obligation | 0 | 0 | 2 | 1 |
| Sexual harassment | 4 | 6 | 4 | 1 |
| Sexual exploitation and abuse | 0 | 1 | 0 | 0 |
| Total | 19 | 19 | 13 | 11 |

preliminary inquiry, the whole process, from intake to closure, was concluded in 108 days on average. For cases that were closed during the investigation phase (i.e., without a report and the review of the report by the subject), the process required 186 days on average, from intake to closure. This means that most cases are addressed in substantially shorter time than the ones requiring a report to the HRDVP.

V. Sanctions by Institution

Out of the 11 cases that led to a report to the HRDVP, the subjects were IBRD staff in five cases and IFC staff in six cases. Out of these 11 cases, five were initiated in fiscal year 2020 and six started in fiscal year 2021. Out of the six cases where sanctions were imposed this year, the subjects were IBRD staff in three cases and IFC staff in three cases.

MAINTAINING EXCELLENCE

To maintain excellence, BIR investigators continuously undergo training, learning, and development. Fiscal year 2021 was no exception. For example, investigators attended training workshops sponsored by the Association of Workplace Investigators. Topics covered ranged from investigation report writing workshops to assessing credibility and interviewing techniques. The investigation team also

received training throughout the year from world-class instructors. Training included role playing and lessons learned from actual cases investigated, understanding evidence and legal elements, investigating retaliation claims, writing reports, open-source intelligence training, and the neuroscience of interviewing. Many of the investigators also engaged in language training to enhance their ability to work in multiple languages.

EBC is involved in many global partnerships that share best practices in conducting internal investigations. Many BIR investigators attended the Conference of International Investigators (CII) held virtually in May 2021. At the CII, EBC conducted a presentation on "The Anti-Harassment Coordinator: An Innovative Way of Resolving Harassment and Sexual Harassment Allegations," during which over 190 attendees participated virtually. At the session, the Bank Group showcased how the BIR unit interacts and works closely with the AHC in addressing these difficult and often complex matters.

PROMOTING TRANSPARENCY

In fiscal year 2021, HRDVP made decisions on eight EBC investigation reports. Half of the reports involved staff members at grade level GH or above. The Appendix table summarizes the outcomes of the HRDVP decisions. Of these decisions, two were

outcomes from investigation reports that were submitted in fiscal year 2020 and six were from reports submitted in fiscal year 2021. Additionally, EBC submitted six reports in the fourth quarter of fiscal year 2021 that are still pending decisions as of the end of June 2021.

EBC continues to foster transparency and accountability by publishing on a quarterly basis on the [Bank Group intranet](#) the cases substantiated by EBC and sanctioned by the HRDVP. The report includes location (headquarters or a country office), type of misconduct found by HRDVP, type of sanction, and the subject's grade level. This data is reproduced in the Appendix of this report.

RETALIATION PREVENTION AND PROHIBITION IN THE WBG

The fear of retaliation exists in different degrees in most, if not all, organizations. The WBG is no exception: although the staff engagement survey shows that the majority of staff feel they can report misconduct without fear of reprisal, there is a significant minority of staff who report not feeling comfortable.

EBC has commissioned an external expert with a distinguished career in ethics programs of international organizations and in particular the UN system,

to review the existing policies and practices of the WBG regarding retaliation. The report will be a valuable input for the upcoming discussion and cooperation between EBC, HR, Legal, the Staff Association and the IJS to seek improvements of the anti-retaliation system.

Confidentiality and anonymity

Staff who are concerned about possible retaliation have the option to remain anonymous. EBC provides two alternative routes. EBC accepts to review allegations that are provided anonymously, i.e., in situations where EBC does not know the identity of the individuals who report allegations. Some reporters reveal their identity confidentially to EBC but request not to reveal their identity to anyone else. The victim-centric approach adopted by the AHC implies that the wishes of confidentiality and anonymity of reporters are always respected by the AHC.

The anonymity rate, i.e., the proportion of anonymous complaints, for the allegations of misconduct was 24 percent (34 out of 141 cases).

The AHC consultations with the reporters and complainants are confidential and the identity of the complainant is revealed only with the respective party's consent.

SPECIAL REPORT ON HARASSMENT AND SEXUAL HARASSMENT

The World Bank Group continues to demonstrate its commitment to tackling harassment and sexual harassment in the workplace. EBC has led the successful implementation of the World Bank Group's three-year *Action Plan for Preventing and Addressing Sexual Harassment*. And it continues to advance a victim-centered approach to addressing these situations, including by collaborating with organizations of the United Nations system. There is also a growing demand for EBC's Anti-Harassment Coordinator (AHC) services.

IMPLEMENTATION OF THE ACTION PLAN FOR PREVENTING AND ADDRESSING SEXUAL HARASSMENT

Launched in May 2019, the *World Bank Group Action Plan for Preventing and Addressing Sexual Harassment* specified more than 70 initiatives. EBC has led the implementation of the Action Plan and as of the end of fiscal year 2021, most measures have been successfully implemented. The WBG staff-led working group on sexual harassment continues to meet and advise on issues related to sexual harassment at the WBG. The most pressing priorities are currently focused on building upon the



strides made in creating and implementing avenues to safely report and effectively address inappropriate behaviors, by supporting the Bank's initiatives to innovate and enhance post-reporting monitoring, restorative processes, security, health and wellness, and other wrap-around protective measures for staff who speak up, thereby carrying us all forward.

ADVANCING A VICTIM-CENTERED APPROACH TO ADDRESS SEXUAL HARASSMENT

The WBG co-leads a workstream mandated to advance a victim-centered approach to sexual harassment with the Chief Executive Board Task Force on Addressing Sexual Harassment within the Organizations of the United Nations System. The Task Force has recently adopted [a set of principles](#) that respect victims'/survivors' rights, wishes, and dignity; protect them from retaliation, re-traumatization, and discrimination; and keep them informed of developments in their case. The principles have now been endorsed by the High-Level Committee on Management of the United Nations System Chief Executive Board for Coordination, of which the WBG is a member. The workstream is also developing an exit survey for victims/survivors of sexual harassment to get feedback on their experience and the support they received to address their allegations.

In addition, the Task Force recently released its *Investigators' Manual for Investigations of Sexual Harassment Complaints in the United Nations*, which focuses on adopting a victim-centered approach throughout investigations. The WBG contributed to this Manual, which is already being implemented in EBC-conducted investigations.

SETTING STANDARDS FOR BEST PRACTICE

EBC regularly engages with external experts to review and benchmark its policies. This year, EBC participated in an international benchmarking study commissioned by the European Commission and conducted by Deloitte on measures related to the prevention of harassment. The study showed that the

World Bank Group has established the most complete and effective framework among international peers and other leading European organizations.

THE ANTI-HARASSMENT COORDINATOR ROLE

The AHC is a confidential resource within EBC available to review and address situations involving harassing, sexually harassing, and other inappropriate behaviors in connection with work at the World Bank Group, including situations involving staff and external parties.

Addressing inappropriate behaviors

The AHC has various options to uniquely address a broad range of harassment-related behaviors, regardless if the behaviors may rise to the level of sanctionable misconduct. Affected individuals can seek guidance about alternatives for addressing unwelcome behaviors without the need to initiate a formal investigation.

The AHC initially provides a "triage" function to identify the nature of the concerns and advise on possible options. The AHC tailors its advice about the appropriate course of action to each unique situation and proceeds only with the consent of the affected individual. This can include advising the affected individual on strategies for them to address the concerns directly, with management if appropriate. The AHC can also directly caution alleged offenders about inappropriate behaviors and discuss strategies to adjust behavior. This generally includes discussions with management to ensure implementation of remedial or preventive measures. Where the affected individual seeks a formal review of alleged misconduct, the AHC refers the matter to EBC's investigations unit (BIR), with the affected individual's consent. Where appropriate and with the affected individual's consent, the AHC also collaborates with and refers situations to other IJS services. Some staff prefer to take an incremental approach to addressing unwelcome behaviors; AHC services provide this flexibility.

FIGURE 8. INFOGRAPHIC ON ANTI-HARASSMENT COORDINATOR FUNCTION

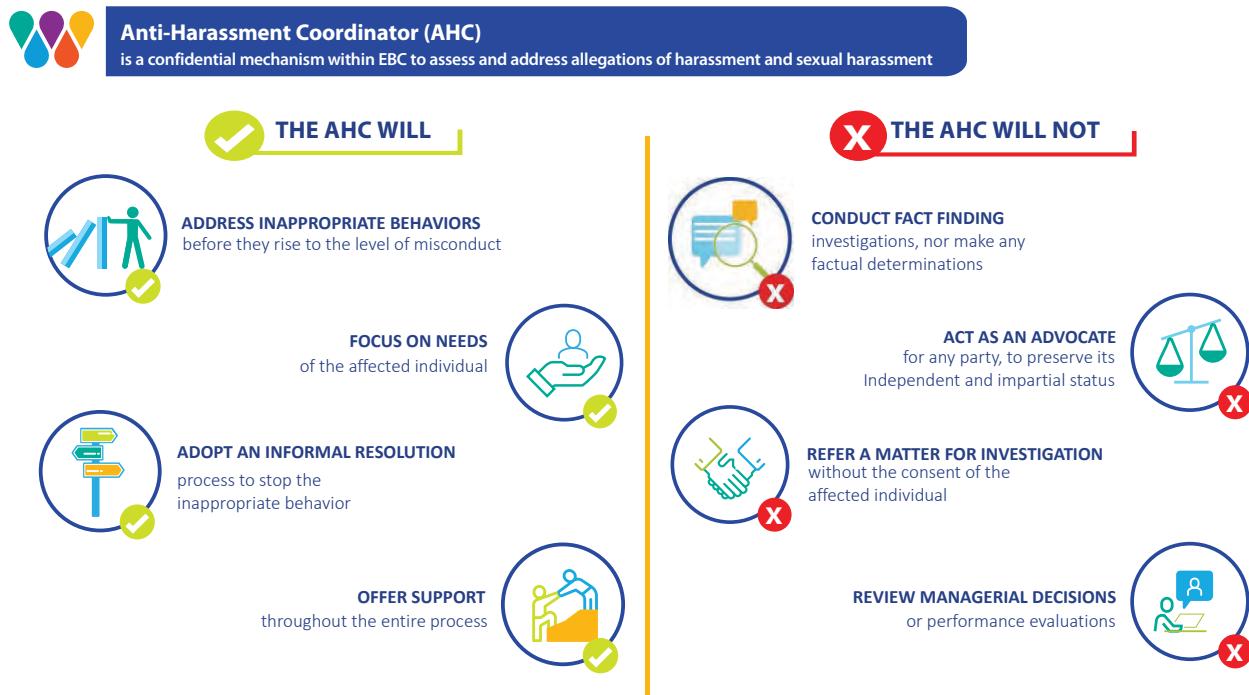


TABLE 17. SITUATIONS INVOLVING HARASSING OR SEXUALLY HARASSING BEHAVIORS RECEIVED AND ADDRESSED BY THE AHC, FY21

| Situations, FY21 | Carried Over from FY20 | Received in FY21 | Addressed in FY21* | Under Monitoring at the End of FY21 | Open at the End of FY21 |
|-------------------|------------------------|------------------|--------------------|-------------------------------------|-------------------------|
| Harassment | 16 | 102 | 91 | 21 | 27 |
| Sexual Harassment | 5 | 26 | 23 | 6 | 8 |
| TOTAL | 21 | 128 | 114 | 27 | 35 |

*Addressed situations are detailed in Table 18.

As compared to fiscal year 2020, in fiscal year 2021, there was a stability in the number of situations the AHC received involving sexually harassing behaviors and an increase in the number of situations involving harassing behaviors.

Specifically, in fiscal year 2021, the AHC received 128 situations involving harassing or sexually harassing behaviors. Of these, 26 (20%) were situations involving sexually harassing behaviors and 102 (80%) were situations involving harassing behaviors. In fiscal year 2020, (starting from November 2019, when the AHC work began), the AHC received 80 situations: 20 (25%) involving sexually

harassing behaviors and 60 (75%) involving harassing behaviors.

The stability in the number of situations involving sexually harassing behaviors received may be a result of the current home-based work setting (with more limited physical proximity, absence of mission travel, etc.); the implementation of measures in the Action Plan that tackle and prevent the occurrence of sexually harassing behaviors; and the WBG's extensive initiatives to increase WBG staff awareness of unacceptable behavior more broadly. The increase of the number of situations involving harassing behaviors may reflect growing awareness of the AHC's role in addressing a broader range

TABLE 18. OUTCOMES OF SITUATIONS ADDRESSED BY AHC⁷

| Primary outcome* | Sexual harassment | Harassment | Total |
|---|-------------------|------------|------------|
| Addressed through consultation/advice | 8 | 44 | 52 |
| Cautioned subject | 7 | 18 | 25 |
| Advised subject | 1 | 6 | 7 |
| Management addressed in consultation with AHC | 3 | 6 | 9 |
| HR addressed in consultation with AHC | 1 | 2 | 3 |
| Referred to investigations | 1 | 7 | 8 |
| Referred to other IJS services | 1 | 7 | 8 |
| Closed without action* (reporter failed to respond) | 1 | 1 | 2 |
| Total | 23 | 91 | 114 |

*This table captures the primary outcome of addressed situations; some situations involve multiple outcomes.

of behaviors—from more limited or occasional micro-aggressive or inappropriate behaviors, to more complex, systemic, or severe situations—as well as the Bank’s efforts to encourage staff to speak up and resolve workplace concerns. It may also reflect increasing trust in the confidential, informal, and efficient nature of the AHC’s services, which seek to resolve issues and foster a respectful work environment by creatively and quickly addressing staff concerns before behaviors escalate. And there has been an increasing number of managers referring matters involving harassing behaviors to the AHC, either to seek advice for addressing situations directly or AHC collaboration in resolving those situations.

In fiscal year 2021, the AHC cautioned or (less formally) advised 32 staff about inappropriate behaviors. In addition, HR similarly addressed three situations with the support of the AHC and nine situations were formally addressed directly by managers in consultation with the AHC. Examples of inappropriate behaviors addressed include: engaging in intimidating, demeaning, or aggressive behaviors; using an aggressive communication style, including where it prevented staff from being comfortable raising issues related to COVID-19 and home-based work or where the communication style was

perceived as pressuring staff to agree on substantive issues; ridiculing or undermining staff in front of others; unfairly disparaging colleagues’ professional reputation or spreading rumors about colleagues; engaging in a pattern of microaggressions that created an unhealthy or hostile work environment; sending unwelcome, personal messages outside of work, which at times contained sexual material; making offensive jokes or comments, including with racist and sexist connotations; commenting on colleagues’ physical appearances and private lives; making innuendos with sexual undertones; and repeatedly making unwelcome invitations.

Assisting managers in addressing inappropriate behaviors

An increasing number of managers (19) actively solicited the AHC’s services to address concerns of inappropriate behaviors their staff reported to them, such as disrespectful or offensive comments, intimidating behaviors, and unwelcome behaviors of sexual nature.

As mentioned, in some cases, the AHC advised managers who cautioned staff or otherwise directly addressed the situation. In other cases, where the affected individual consented, the AHC and

⁷ Table 18 includes the outcomes of the situations the AHC addressed in fiscal year 2021. This includes both outcomes of situations received in fiscal year 2021 and of some received in fiscal year 2020 that carried over into fiscal year 2021. This table does not include the cases pending resolution at the time this report was published.

managers had joint conversations with alleged offenders to bring the concerns to their attention, remind them of the applicable rules and WBG's core values, and discuss strategies for adjusting behavior. Where appropriate, some managers took additional action to protect the affected staff or avoid recurrence of the reported behavior, including through performance management, altering the work program or reporting lines where it would not negatively impact affected staff, and implementing measures to limit contact between the affected staff and the alleged offenders. The AHC and managers ensured monitoring of the situation after resolution to prevent recurrence or negative consequences for the affected staff. Several managers expressed their satisfaction about the effective and efficient resolution of the situation.

The AHC also worked with managers to address situations where external parties were alleged to have engaged in inappropriate behaviors towards WBG staff in the context of their work, in line with the guidelines for [Addressing Harassment by External Parties](#) adopted in fiscal year 2021. The AHC and managers partnered to provide support to staff and, where appropriate, to raise to the attention of the external counterpart the concerns that required their action.

Preventing retaliation and ensuring a beneficial outcome

Once the AHC addresses a situation, the AHC continues monitoring to ensure that the concerns have been effectively resolved and there is no retaliation or reprisal. This reflects a clear institutional message: harassment, sexual harassment, and retaliation will receive an institutional response and will be addressed in cooperation with EBC. Developing a culture of trust in the WBG requires this commitment to ensuring a safe and respectful work environment for those who raise concerns.

MEASURING IMPACT

The AHC began soliciting anonymous feedback in March 2021 from staff and managers who have used AHC services. The feedback reflects appreciation of this flexible and unique option for addressing concerns and advancing a respectful environment. The 28 feedback providers rated the AHC services on average a 4.7 out of 5, with 96.4 percent strongly agreeing that they were able to express their concerns in a safe and confidential environment. Feedback received includes recognition that the AHC's early triage and intervention helps address cases of potential misconduct early, allowing behavioral adjustment before escalation. And that AHC services "build trust in the IJS overall." Descriptions of AHC services included: "very timely and very helpful advice and support;" "without this service I would not have felt comfortable raising the issues I did . . .;" and that the AHC "bridges an important gap by providing a positive service based on remediation rather than investigation."

RAISING AWARENESS AND BUILDING TRUST

The AHC continues to meet a demand from staff and management for training on topics relating to harassment and sexual harassment generally and resources and techniques to address unwelcome behaviors. In cooperation with ATV and other IJS partners, the AHC team reached over 2,300 staff at headquarters and country offices by engaging in 29 townhalls, team meetings, and participation in trainings such as *Creating a Respectful and Harassment-Free Workplace*.

EBC also partnered with several regional groups, including the South Asia Region, East Asia and the Pacific, and a country team in Chennai to develop a series of cartoons portraying problematic behaviors based on staff experience and identifying strategies to address these behaviors. Diarietou Gaye in the Africa Region initiated this innovative approach to raise awareness, which is particularly appreciated by staff.

**FIGURE 9. ILLUSTRATION BY
SOUTH ASIA REGION FOR THEIR SAFE AND RESPECTFUL SAR INTERNAL CAMPAIGN**



ADDITIONAL DATA RELATING TO HARASSMENT AND SEXUAL HARASSMENT

TABLE 19. ALLEGATIONS OF HARASSMENT OR SEXUAL HARASSMENT, FY17-FY21

| | FY17 | FY18 | FY19 | FY20 | FY21 |
|--|-----------|------------|------------|------------|------------------------|
| Harassment and sexual misconduct reviewed by BIR | 71 | 114 | 113 | 94 | 20 |
| Situations involving harassment reviewed by AHC | 0 | 0 | 0 | 60 | 102 |
| Situations involving sexual harassment reviewed by AHC | 0 | 0 | 0 | 20 | 26 |
| Total of situations reviewed by the AHC | 0 | 0 | 0 | 80 | 128 |
| Total of situations reviewed by AHC and BIR | 71 | 114 | 113 | 174 | 148⁸ |

8 Twelve cases were reviewed by both the AHC and BIR.

TABLE 20. CLASSIFICATION OF SEXUAL HARASSMENT ALLEGATIONS AND SITUATIONS RECEIVED BY BIR AND THE AHC, FY21

| | Allegations of sexual harassment received by BIR | Situations involving sexually harassing behaviors received by the AHC |
|---|--|---|
| Sexual assault | 1 | 3 ⁹ |
| Hostile work environment (HWE): | | |
| HWE—Comments/gestures | 0 | 10 |
| HWE—Unwelcome requests | 1 | 5 |
| HWE—Sharing and displaying offensive material | 0 | 1 |
| HWE—Touching | 1 | 7 |
| Sexual exploitation and abuse | 1 | 0 |
| Quid pro quo | 0 | 0 |
| Total | 4 | 26 |

TABLE 21. SEXUAL HARASSMENT ALLEGATIONS ADDRESSED BY BIR DURING INVESTIGATION STAGE, FY21

| | |
|--|----------|
| Total number of allegations processed in FY21 | 5 |
| Total number of allegations addressed in FY21 | 5 |
| Closed at intake | 1 |
| Closed during preliminary inquiry | 2 |
| Closed during investigation | 1 |
| Reports to HRDVP | 1 |
| Allegations carried over to FY22 | 0 |

TABLE 22. CLASSIFICATION OF REPORTERS OF SEXUAL HARASSMENT SITUATIONS RECEIVED BY THE AHC, FY21

| Reporter Classification | Number |
|-------------------------|-----------|
| Manager | 7 |
| Victim/Survivor | 15 |
| Witness | 1 |
| Other | 3 |
| Total | 26 |

9 Two of the reported sexual assault situations concern alleged incidents unconnected to the workplace, falling under the purview of the local authorities. The third was referred to the EBC Investigations unit (BIR) and the reporter declined to pursue a formal investigation process at that time.

TABLE 23. SITUATIONS OF HARASSMENT AND SEXUAL HARASSMENT RECEIVED BY THE AHC BY INSTITUTION, FY21

| Institution | Number of situations |
|-----------------------|----------------------|
| IBRD | 67 |
| Harassment | 53 |
| Sexual harassment | 14 |
| IFC | 38 |
| Harassment | 36 |
| Sexual harassment | 2 |
| Other/External | 23 |
| Harassment | 13 |
| Sexual harassment | 10 |
| Total | 128 |

Note. The situations the AHC received involving harassing or sexually harassing behaviors in IFC represent more than half the number of similar situations addressed in IBRD. This is, at least in part, an apparent result of EBC's targeted efforts to address previously identified under-reporting in IFC, including establishing an EBC representative in IFC.

TABLE 24. LOCATION OF SUBJECTS IN SITUATIONS RECEIVED BY THE AHC, FY21

| Location | Number of situations involving sexual harassment | Number of situations involving harassment | Number of situations reported to the AHC |
|----------------|--|---|--|
| CO | 6 | 20 | 26 |
| HQ | 10 | 69 | 79 |
| Other/External | 10 | 13 | 23 |
| Total | 26 | 102 | 128 |

Note. The majority of the subjects of situations involving harassing or sexually harassing behaviors were located in Washington, DC. It should be noted that many staff in country offices report to staff in Washington, DC. Some of the 75 situations involving subjects in Washington, DC originated in country offices.

TABLE 25. GRADES OF COMPLAINANTS (AFFECTED INDIVIDUALS) IN SITUATIONS RECEIVED BY THE AHC, FY21

| | GA-GD | GE-GG | GH-GI | Consultants | Other/anonymous | Total |
|-------------------|-------|-------|-------|-------------|-----------------|------------|
| Sexual harassment | 3 | 9 | 1 | 8 | 5 | 26 |
| Harassment | 12 | 55 | 12 | 12 | 11 | 102 |

Note. Situations involving harassing and sexually harassing behaviors predominantly involve complainants (affected individuals) at GE to GG levels or consultants.

TABLE 26. GENDER OF COMPLAINANTS IN SITUATIONS RECEIVED BY THE AHC, FY21

| Complainant's Gender | Number of situations involving sexual harassment | Number of situations involving harassment |
|-----------------------|--|---|
| Female | 18 | 64 |
| Male | 3 | 27 |
| Unidentified/External | 5 | 11 |
| Total | 26 | 102 |

TABLE 27. SITUATIONS BROUGHT TO THE AHC BY MANAGERS OR HR ON BEHALF OF OTHER AFFECTED INDIVIDUALS, FY21

| Category | Manager/Supervisor | HR Business Partner/Manager |
|-------------------|--------------------|-----------------------------|
| Sexual harassment | 7 | 0 |
| Harassment | 12 | 1 |

Note. Nearly one out of every four situations involving sexually harassing behaviors was brought to the AHC by the manager of the complainant (affected individual). Over ten percent of the situations involving harassing behaviors were reported by the manager of the complainant.

TABLE 28. GRADES OF INDIVIDUALS WHO WERE THE SUBJECTS OF SITUATIONS RECEIVED BY THE AHC, FY21

| | A-D | E-G | H-I | CONSULTANT | UNIDENTIFIED/EXTERNAL PARTY |
|-------------------|-----|-----|-----|------------|-----------------------------|
| Sexual harassment | 0 | 5 | 4 | 7 | 10 |
| Harassment | 5 | 29 | 54 | 1 | 13 |

Note. People who are the subject of situations involving sexually harassing behaviors are open-ended or term staff in a third of the situations. In two-thirds of the situations, the subjects are consultants or external (or unidentified) parties. By contrast, 86 percent of the situations involving harassing behaviors involve subjects who are term or open-ended staff, and who, in half of the received situations, are at GH or GI level.

TABLE 29. GRADES OF SUBJECTS IN SITUATIONS WHERE THE AHC AND/OR MANAGEMENT INTERVENED TO ADDRESS THE SITUATION, FY21

| | A-D | E-G | H-I | CONSULTANT | EXTERNAL PARTY |
|-------------------|-----|-----|-----|------------|----------------|
| Sexual harassment | 0 | 3 | 5 | 1 | 2 |
| Harassment | 1 | 8 | 20 | 1 | 0 |

Note. This table captures the grade of the subject in each situation addressed through AHC intervention or by management in consultation with the AHC; some situations involved the same subject. In over half of the AHC's interventions in situations involving sexually harassing behaviors and more than two-thirds of AHC interventions in situations involving harassing behaviors, the subject was at grade level GH.

TABLE 30. GENDER OF SUBJECTS IN SITUATIONS RECEIVED BY THE AHC, FY21

| Subject's Gender | Number of situations involving sexual harassment | Number of situations involving harassment |
|-------------------------|---|--|
| Female | 1 | 45 |
| Male | 15 | 44 |
| Unidentified/External | 10 | 13 |
| Total | 26 | 102 |

EMBEDDING ETHICS THROUGHOUT THE WORLD BANK GROUP

EBC is proactively engaged in a number of initiatives to ensure an ethical workplace culture at the World Bank Group. In fiscal year 2021, EBC activities reached more than 16,000 WBG staff.

Key engagements included regular meetings with senior leaders to ensure the "tone at the top"

reflects our core values; ethics training specifically designed for managers; reinforcing EBC's presence at the IFC; promoting a culture of compliance with Staff Rules; conducting root cause analysis of advisory and investigative activities; identifying and applying best practices; and continuing its cooperation with other international organizations.



TABLE 31. STAFF REACH OF EBC ACTIVITIES, FY21

| Activities of EBC in FY21 | Number of WBG staff |
|---|---------------------|
| WBG senior leaders participating in ethics onboarding program | 17 |
| WBG staff participating in training | 7,228 |
| <i>Of whom number of IFC staff participating in training</i> | 1,663 |
| WBG staff participating in townhall with EBC | 1,138 |
| WBG staff attending Ethics-at-Work sessions | 944 |
| WBG staff asking EBC for advice and receiving a response within 8 hours on average | 1,373 |
| WBG staff requested to provide a Declaration of Interest form | 5,138 |
| <i>Of whom WBG staff with situations requiring resolution</i> | 270 |
| WBG senior leaders providing Declaration of Interest for public financial disclosure | 48 |
| WBG staff contacting the Anti-Harassment Coordinator regarding situations involving harassment | 102 |
| WBG staff advised or cautioned regarding situations involving harassment*** | 24 |
| WBG Managers or Business Partners advised by EBC regarding how to address situations involving harassment | 9 |
| WBG staff contacting the Anti-Harassment Coordinator regarding situations involving sexual harassment | 26 |
| WBG staff advised or cautioned regarding situations involving sexual harassment*** | 8 |
| WBG staff contacting EBC to report allegations of misconduct* | 123 |
| WBG staff who were the subject of misconduct investigations** | 23 |
| Overall number of times EBC was in contact with WBG staff **** | 16,201 |

Notes.

* This assumes one reporter per case, even though some cases have several reporters.

** In addition, EBC contacted witnesses, which is not reflected here.

*** In situations where the Anti-Harassment Coordinator cautions or advises subjects, the Manager of the subject is also contacted in most cases, which is not reflected here.

**** Staff in contact with EBC for several purposes are counted as one for each purpose.

SETTING THE TONE FROM WBG LEADERSHIP

Developing an ethical culture requires an internal consensus about what this culture is going to be and also requires the culture to be compatible with the strategy of the organization. This is why the commitment of WBG senior leaders to developing an ethical organizational culture is so important.

The Chief Ethics Officer meets regularly with the WBG President to inform him of key issues and trends relating to the ethics of the WBG. He also meets with the Managing Director and WBG Chief Administrative Officer (MDCAO) on a regular basis, both individually and with the corporate leadership.

In addition, EBC has developed the practice of meeting every Director, Vice-President or Managing Director who joins the WBG or is promoted to such functions. This is the opportunity to review the personal situation of the senior leader, ensuring that no conflict of interest needs addressing and preparing the Declaration of Interest which, for Vice-Presidents and above, is published on the internet (except for the private information such as name of spouse or children, or address). It is a first commitment of the senior leader to transparency and to an organizational culture that addresses all situations of conflict of interest.

More fundamentally, these introductory meetings are the opportunity for the Chief Ethics Officer to present his vision of ethics in the organization and receive feedback from senior leaders. It is also the opportunity to inform senior leaders about all the services that EBC makes available to staff. This knowledge of the strategy and approach of EBC enables senior leaders to reinforce EBC's message and integrate the commitment to the Core Values and the Code of Ethics in their practice. This is what is often described in the ethics literature by the expression "tone at the top." Clearly, in an organization that pursues ethical objectives as the WBG does, the tone at the top is very supportive of ethics.

EBC has also developed an ethics training program specifically designed for managers and directors (GH-GI levels). This is in line with the emerging best practice of addressing "the tone in the middle," ensuring that the "tone at the top" is both embraced and effectively relayed throughout the organization.

SETTING THE TONE IN THE MIDDLE

The origins of the situations involving harassment and sexual harassment on the one hand and misconduct on the other are different. The data for fiscal year 2021 reveals that 31 percent of the misconduct allegations are reported by staff at grade levels GE to GG and 17 percent of the misconduct allegations are reported by staff at grade levels GH and GI. As the GH and GI staff represent significantly less than 17 percent of the overall staff numbers, this means that staff at grades GH and GI are more likely to report allegations, which may reflect the manager's obligation to report but is hopefully also a sign of a positive "tone in the middle."

In particular, more than a quarter of all situations involving sexual harassment are reported by managers (in addition to cases where they are not victims or survivors themselves), and over 10 percent of the situations involving harassment are reported by managers.

Functions at level GH and above consulted EBC in 215 situations this fiscal year, demonstrating an effective desire to be in compliance with the WBG rules.

REINFORCING EBC PRESENCE IN IFC

EBC provides a dedicated resource for the International Finance Corporation (IFC) through the position of an EBC Representative for IFC. The role became effective on July 1, 2021.

The representative's priorities are to (i) support IFC-wide conversations on the WBG's Core Values and Code of Ethics, championing a values-based culture; (ii) provide advice and guidance to IFC on ethics and business conduct issues, ensuring that ethics is fully integrated into our activities; and (iii) oversee the implementation of high-quality outreach and training activities as part of a preventive strategy aimed at strengthening ethics fundamentals at IFC, including IFC country offices.

EBC provided guidance and advice in mitigating conflicts of interest related to staff members' outside activities, political activities, public statements, social media, and personal financial conflicts of interest. In fiscal year 2021, the representative at IFC and the EBC Advisory Services received and addressed 294 requests for advice and guidance.

In fiscal year 2021, over 1,663 IFC staff attended one of EBC's training offerings as compared to 561 in fiscal year 2020. During this period, EBC rolled out 14 *Ethics Awareness* sessions (EAS) for new IFC staff, 17 EAS for other IFC staff, five *Creating a Respectful and Harassment-Free Workplace* (CRW) sessions, and four sessions of the *Manager Conversation to Create a Respectful Workplace*.

Expanding outreach through collaboration

In addition to the training delivered, EBC expanded its outreach by collaborating with other IFC groups on various fronts this past fiscal year. For example, the EBC representative:

- Delivered Inclusive Workplace Onboarding series jointly with IFC Diversity and Inclusion and Corporate Responsibility teams
- Joined IFC virtual onboarding for new staff
- Collaborated with CBR office to address conflict of interest issues
- Met regularly with IFC Respectful Workplace Advisors (RWAs) to understand trends and identify opportunities for collaboration.

DEVELOPING A CULTURE OF COMPLIANCE

An ethical culture is not only based on adherence to core ethical values or principles. It also relies on compliance with a set of ethical rules and, in particular, those preventing conflicts of interest and those preventing WBG resources from being used for any other purpose than WBG activities.

EBC is promoting a culture of compliance by providing advice, outreach, and training to staff, and monitoring compliance with these rules. EBC also encourages a safe speaking environment where proposing an idea, raising a concern, pointing out a risk, or reporting on the realization of a risk, may be performed routinely by staff without hesitation and without fear. This is not only important for the WBG to be an employer of choice, but also to develop an efficient culture where staff speak for the benefit of the organization and where there is no hesitation about informing management of an operational or reputational risk. Reporting potential conflict of interest incidents should not only be accepted but encouraged. This is an essential element of a sound risk management culture, and therefore contributes to the sustainability of the organization.

EBC has continued the practice established in recent years of cooperating with corporate services and providing an ethical angle to important corporate deliberation. The Chief Ethics Officer is a member of the Enterprise Risk Committee, the World Bank Group Procurement Committee, the Operational Risk Committee, and the Internal Justice Senior Management Council, which include

senior leaders from the WBG, including operational departments. EBC staff participate on a continuous basis in the review of procurement proposals and contribute to operational risk reporting both in the World Bank and in the IFC. In fiscal year 2021, the Chief Ethics Officer has become a member of the Corporate Responsibility Oversight Committee, reflecting the increasing integration of ethics with operational objectives and activities.

In fiscal year 2021, EBC also started cooperating with the Development Economics Vice Presidency (DEC) to produce a manual on conflicts of interest applicable in the field of economic data collection, analysis, and research. In parallel, EBC has developed a tailored training for DEC on ethics awareness, focusing on DEC's specific activities and challenges. Further cooperation with DEC is envisaged to incorporate research and data ethics with DEC's activities.

EBC is also reviewing critically the scope of ethical compliance at the WBG. A working group that includes Group Internal Audit (GIA), the Legal Vice Presidency, Chief Risk Officer (CRO) and EBC has concluded that, while the prevention of personal conflicts of interest is adequate and the rules preventing the misuse of resources are clear, there is a need to improve the treatment of conflicts of interest in World Bank operations. The first step was the introduction of a prohibition of business-related conflicts of interest (e.g., staff should not work on WBG operations which their family relatives are invested in or working for).

Operational conflicts of interest that arise in IFC operations are managed by the Compliance and Business Risk (CBR) unit of the IFC. The operational risks involving several WBG institutions (e.g., IFC and MIGA) are addressed by CBR in IFC and Conflict of Interest Officers in the Legal Vice Presidency or departments of the World Bank and MIGA. However, it is EBC's responsibility to address conflicts of interest that arise between several World Bank activities. While conflicts of interest between private-sector operations are most often addressed by establishing a functional and informational

separation between separate teams that will each separately take care of one operation, conflicts of interest between public-sector operations require a different approach.

EBC is also cooperating with CRO and HRD to provide more complete integrity due diligence of staff, including short-term consultants.

IDENTIFYING GAPS THROUGH ROOT CAUSE ANALYSIS

EBC is now applying “root-cause analysis” to both its advisory and investigatory activities. This consists in reviewing whether situations of non-compliance are due to (i) a gap in the rules, (ii) an inadequacy of the rules, (iii) a poor implementation of the rules, or (iv) an insufficient knowledge of the rules by staff.

Root cause analysis is one of the most effective forms of feedback for a control function. It is an objective, structured approach to identify the most likely underlying causes of an issue within an organization. In particular, it enables EBC to assess the situations in which staff failed or hesitated to comply with the ethical rules of the WBG. The lessons learned are shared with operational services, GIA, and directly applied to EBC’s activities.

Beginning in fiscal year 2019, EBC developed a methodology to capture the root cause of staff’s lack of awareness of rules, non-compliance, inappropriate behavior and misconduct, and has since used the analysis as an input to a remediation process whereby corrective actions can be taken by the affected unit, department or Vice-Presidential Unit, to prevent the problem from reoccurring.

In fiscal year 2021, EBC’s BIR team embedded root cause analysis into its case closure process, conducting the analysis at the completion of preliminary inquiries and investigations when applicable. Our analysis over the past years has contributed to the identification of control weaknesses in: a) HR benefits and entitlements, b) management of

WBG assets and equipment, c) travel benefits and accounting, d) overtime payments, e) country office closure procedures and evacuation of non-nationals, and f) country office procurement practices.

In the area of behavioral misconduct, the root cause analysis identified a need for continued EBC trainings on respectful workplace behaviors and bystander training; increased IJS outreach, particularly to country offices; a targeted approach for vulnerable groups of staff, including consultants and junior staff members; working with HR to continue to reinforce the message that reporting to the AHC is a protected activity and key to stopping unwanted behavior; encourage the use of performance management tools by managers to prevent unwanted behavior from escalating; and working with HSD, HR and others to mitigate and limit environmental factors that may lead to unwanted behavior.

In fiscal year 2021, the root cause analysis methodology was implemented for the first time on a sample of advisory cases on conflicts of interest. Our work here identified gaps in staff knowledge and policies related to a) outside activities and board memberships, b) family relationships during HR recruitment, c) family relationships and conflicts of interest that can be triggered when staff (and/or their relatives) have outside roles, investments or influence in the same (or closely-related) sectors where they conduct WBG work, and d) maintaining political neutrality on social media and in public statements. EBC has also proposed an amendment to Staff Rule 3.03 to transfer to EBC the discretion and jurisdiction (formerly placed on staff’s managers) to establish recusals or other mitigants related to staff personal financial interests in IFC investee companies.

SETTING ETHICAL STANDARDS

EBC continuously stays informed about emerging practices and innovations in the field of ethics and adapts its approach as a result.

International cooperation: Stronger links with other IFIs

In fiscal year 2021, EBC hosted the annual meeting of the Ethics Network of Multilateral Organizations (ENMO) that gathers the senior ethics officers of most public international organizations, especially the UN network and other international financial institutions (IFIs). In his capacity as co-chair of the affinity group of the IFIs in ENMO, the Chief Ethics Officer holds regular discussions with the senior ethics officers of the other IFIs.

Because of the restrictions related to COVID-19, the ENMO annual meeting took place virtually from July 7–10, 2021, and was officially opened by the MDCAO. The keynote topic was ethics in a teleworking environment. Five topics were discussed in closed sessions between the ENMO members:

- **Topic 1:** Harassment (not sexual harassment): Innovative practices in promoting a respectful workplace environment free of harassment, abuse or intimidation
- **Topic 2:** Organizational ethics challenges: Procedure/protocol governing the admissibility of recorded conversations of staff members when one party to the conversation has not consented to such recording.
- **Topic 3:** Analysis of emerging changes and innovations in ethics training and awareness: What are we doing to raise awareness and educate staff in new and novel ways beyond standard online or classroom workshops?
- **Topic 4:** Management of confidential information and report versus requirements from other oversight mechanisms (investigation, internal audit, or human resources). Where do we draw the red line?
- **Topic 5:** Retaliation and whistleblowing policy

Beyond these well-established networks, it has proved challenging to develop new opportunities to collaborate in a virtual environment.

IDENTIFYING BEST PRACTICES

EBC continuously strives to adopt best practices in the field of ethics. This year, it has expanded the scope of its root cause analyses to all investigation cases leading to an investigation report and to a sample of situations in which EBC provided advice. It has established a series of internal working groups to improve or review practices.

Some groups are developing new regulatory standards, others are designing new training programs, others are revising procedures and proposing new information technology developments. In cooperation with Information and Technology Solutions (ITS), EBC has performed evolutive maintenance on its new case management system, adding new functionalities including an internet portal that facilitates interactions with users who would like to request advice or report harassment or misconduct situations.

EBC has also been reflecting on the long-term impact of the COVID-19 crisis on WBG working practices and organizational culture. The pandemic has demonstrated that home-based work could be more widespread than previously thought and is leading some organizations to consider for the future alternative, hybrid home-based and office-based, processes and working methods. EBC has been involved in an internal working group identifying the likely components of a hybrid (in-office and virtual) organizational culture.

INSIDE EBC

To deliver on its mandate to promote the development and application of the highest ethical standards by World Bank Group staff in the performance of their duties, EBC's strategic objectives are to:

- Support WBG staff to embed ethics in everything the WBG does
- Proactively focus on prevention and help to mitigate risks
- Ensure that allegations are addressed efficiently, fairly, and in a transparent way
- Become a center of excellence providing the highest quality of service to our clients.

As a department, EBC is structured to support these objectives. In addition to its front office that reports directly to the Chief Ethics Officer, EBC's diverse staff belong to one of three units: Advisory, Training and Values (ATV); Business Integrity Review (BIR); and Anti-Harassment Coordinator (AHC).

ATV helps staff assess whether their personal and professional activities are in compliance with World Bank Group rules, providing confidential advisory services to staff who contact EBC for advice. The unit is also responsible for designing and delivering

ethics training to the WBG's global staff through a full suite of training offerings. EBC's training content was modernized and enhanced in fiscal year 2021 to meet the needs of staff working in the virtual environment.

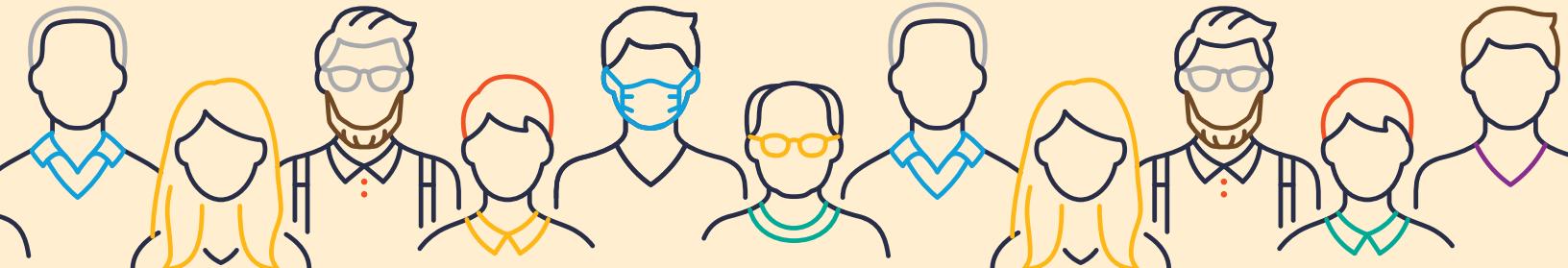
BIR addresses allegations of staff misconduct, investigating possible misconduct with a firm commitment to the principles of due process for subjects and concern for victims.

AHC addresses reports of harassment, sexual harassment, and inappropriate behavior. In fiscal year 2021, it expanded with the addition of a Deputy Anti-Harassment Coordinator position to support the AHC function.

Governance

EBC is headed by the Chief Ethics Officer, who reports to the President of the World Bank Group. For administrative matters, EBC reports to the MDCAO. EBC also reports regularly to the HR Committee of the Board of Directors.

The department is subject to regular audits by Group Internal Audit (GIA), which conducted an advisory review of EBC's investigatory process in fiscal year 2020. GIA has conducted other audits of



EBC in the past, for instance on the management of conflicts of interest¹⁰.

EBC is also part of Deloitte's annual audit of the World Bank Group. Their audit includes a review of the Declaration of Interests program, conflict of interest incidents, and case management of investigations of potential misconduct.

LIVING OUR VALUES: INITIATIVES WITHIN EBC

As a team and custodians of the core values of the World Bank Group, it was appropriate for the EBC team to make the values the key tool to acknowledge each other. On April 29, 2021, EBC held its first-ever EBC Core Values Awards during which EBC staff were recognized for their commitment to the core values and to diversity and inclusion.

Throughout fiscal year 2021, the EBC leadership team hosted regular conversations for EBC staff covering relevant and timely topics, such as the personal and professional impact of COVID-19, mental health and wellbeing, and, more recently, on racism. In March 2021, EBC formed an Anti-Racism Initiative Program with a small task group assigned to develop and program monthly conversations on race and discrimination among EBC staff. This has been very well received by EBC staff who have expressed appreciation for having these regular fora to collectively acknowledge and address these and other top-of-mind issues.

FUTURE INITIATIVES

EBC is committed to expanding its presence in country offices to support the delivery of ethics training, outreach, and advisory services for WBG staff. In fiscal year 2020, new Ethics Officers had been selected to join World Bank offices in Sofia, Nairobi, Dakar, and Johannesburg. However, the coronavirus pandemic postponed their deployment until safe travel is possible again. With growing access to vaccines and reopening of many locations planned in the fall of 2021, EBC aims to move forward with these plans in fiscal year 2022.

During the next fiscal year EBC will also launch a new e-learning on preventing and addressing sexual harassment. The 14-minute video presented in six episodes focuses on an incident during a happy hour that affects colleagues' workplace dynamics. It reinforces that sexual harassment is not tolerated at the WBG, and raises awareness of the various resources available to support staff. Through the video, staff may connect with characters who explore options of how to address the issue from the perspectives of someone who: has experienced harassing behavior, was accused of harassing behavior, is a bystander or a manager.

Complementing this e-learning is new facilitated training on bystander intervention that will be deployed in early fiscal year 2022. Staff will be able to explore ways to support their colleagues in uncomfortable situations and contribute collectively towards a positive and safe workplace environment.

10 As a matter of good governance, a procedure exists to provide alternative investigation routes if a member of the EBC staff has to be investigated, so as to preserve the independence and impartiality of investigations.

APPENDIX

HRDVP Disciplinary Decisions, FY21¹¹

| Location | FY of Case Closing | Misconduct Category | Case Summary | HRDVP Decision | Subject's Grade Level |
|-----------------|---------------------------|---|--|--|------------------------------|
| HQ | FY21 Q1 | Failure to meet personal legal obligations as required by Bank Group policies. | A staff member failed to show proof of compliance with his/her personal legal obligation. | Ineligibility for a promotion until compliance satisfactory to EBC is demonstrated; ineligibility for a salary increase until compliance satisfactory to EBC is demonstrated; and written censure remains on personnel file until aforementioned conditions are met. | GE |
| HQ | FY21 Q1 | Failure to meet personal legal obligations as required by Bank Group policies. | A staff member failed to show proof of compliance with his/her personal legal obligation. | Staff member showed proof of efforts to comply with legal obligations to HRDVP. Further action suspended. | UC |
| HQ | FY21 Q1 | Reckless failure to identify or failure to observe generally applicable norms of prudent professional conduct; and acts or omissions in conflict with general obligations of staff members. | A staff member returning from mission boarded a flight while intoxicated, became disruptive and was consequently removed from the flight. Subsequently the staff member was arrested by the authorities for profane swearing and intoxication in public. | (i) Written censure to remain on personnel file for three years; and (ii) letter of apology to be written by staff member to the airline. | GD |

¹¹ Note that two out of the eight decisions were cases where the reports were submitted in fiscal year 2020.

| Location | FY of Case Closing | Misconduct Category | Case Summary | HRDVP Decision | Subject's Grade Level |
|-----------------|---------------------------|--|---|---|------------------------------|
| HQ | FY21 Q2 | Reckless failure to identify or failure to observe generally applicable norms of prudent professional conduct; and acts or omissions in conflict with general obligations of staff members; harassment and sexual harassment; contributing to a hostile work environment. | A staff member directed unwelcome offensive and hostile language toward a contractor which included offensive comments regarding race, sexual orientation and physical appearance, made unwelcome physical contact of a sexual nature; and created a hostile, intimidating and offensive work environment for the contractor. | (i) Demotion to grade level GD with appropriate title change; (ii) ineligibility for promotion for three years; (iii) ineligibility for salary increase for three-year period; (iv) written censure to remain on personnel file; and (v) letter of apology to be written to contractor and contractor's organization. | GE |
| HQ | FY21 Q2 | Misuse or abuse of Bank Group resources; reckless failure to identify or failure to observe generally applicable norms of prudent professional conduct; acts or omissions in conflict with general obligations of staff members; and harassment; contributing to a hostile work environment. | A staff member inappropriately instructed his/her subordinates to misrepresent and submit personal meal expenses and made comments that were derogatory and inappropriate in nature in describing staff members' countries of origin and when referring to IFC senior management. Staff member also repeatedly used profanity during department meetings. | (i) ineligibility for salary increase for the current fiscal year; (ii) oral censure; (iii) written censure to remain on personnel file; and (iv) agreement to reimburse misrepresented expenses and undertake respectful workplace training. | GI |

| Location | FY of Case Closing | Misconduct Category | Case Summary | HRDVP Decision | Subject's Grade Level |
|-----------------|---------------------------|--|---|---|------------------------------|
| CO | FY21 Q3 | Abuse of authority; reckless failure to observe general applicable norms of prudent professional conduct; violations of Principle 3; and harassment, contributing to a hostile work environment | A staff member displayed harassing, abusive behavior towards country office staff and routinely asked them to perform personal errands. | (i) demotion from managerial GH to technical GH with title change; (ii) reduction in future pay in the form of the salary increase for the year in which misconduct occurred; (iii) written censure in personnel file for three years; (iv) appropriate training course focused on people management and/or interpersonal skills; and (v) written apology to staff. | GH |
| HQ | FY21 Q3 | Misuse of WBG resources; reckless failure to observe general applicable norms of prudent professional conduct; willful misrepresentation of facts intended to be relied upon; and violations of Principle 3 | A staff member knowingly and intentionally fabricated hotel invoices and did not stay at the hotels represented in the Statement of Expenses. | (i) Ineligibility for future employment with the WBG; *(ii) a permanent access restriction to WBG premises; and (iii) written censure to remain on personnel file. *At the time of the issuance of HRDVP's decision, the staff member was no longer employed by the WBG. | GH |
| HQ | FY21 Q3 | Reckless failure to identify or failure to observe generally applicable norms of prudent professional conduct and acts or omissions in conflict with general obligations of staff members set forth in Principle 3 | A staff member misrepresented his/her Statement of Expenses related to mission travel. | (i) ineligibility for promotion for one (1) year; (ii) ineligibility for salary increase for one (1) year; (iii) restitution; and (iv) written censure to remain on personnel file. | GH |



WORLD BANK GROUP Core Values

IMPACT. INTEGRITY. RESPECT. TEAMWORK. INNOVATION.

The World Bank Group's twin goals are to eliminate extreme poverty by 2030 and to boost shared prosperity for the bottom 40 percent of each developing country. For the diverse workforce of the Bank Group, integrity, ethical behavior, and adherence to corporate values are core to the success of these goals.

Our core values should drive everything we do every day. Not only do our core values serve as the North Star for WBG staff in how we treat our clients and partners, but they also guide clients and stakeholders in the best way to collaborate with Bank Group staff.

Clients approach the Bank Group to find the best solutions to address the world's most pressing development challenges.

Impact, integrity, respect, teamwork, and innovation are integral to making us who we are and defining how we deliver for our clients. Therefore, the core values help us focus on how we achieve our twin goals. Jobseekers, investors, and public and private sector counterparts alike will see our core values in action.

In fiscal year 2018, the World Bank, IFC, and MIGA jointly committed to a common set of core values. This is the first time all institutions of the Bank Group have collectively adopted the same core values.



impact

We help our clients solve their greatest development challenges

- We use our convening power, commitment to excellence, and deep professional expertise to facilitate outcomes that reduce poverty and improve people's lives
- We make decisions that prioritize impact over politics or process
- We stay at the cutting edge in our fields of expertise
- We leverage the best knowledge and expertise available from within and outside the World Bank Group
- We partner with our clients with flexibility and agility



integrity

We do what is right

- We hold ourselves, our clients, and our partners to the highest standards for responsibility, accountability, and quality
- We put the interests of the World Bank Group and our clients first
- We ensure our words are consistent with our actions
- We take ownership of our actions and decisions
- We communicate with honesty and transparency
- We question actions that are inconsistent with our values



respect

We care for our people, our clients, our partners, and our planet

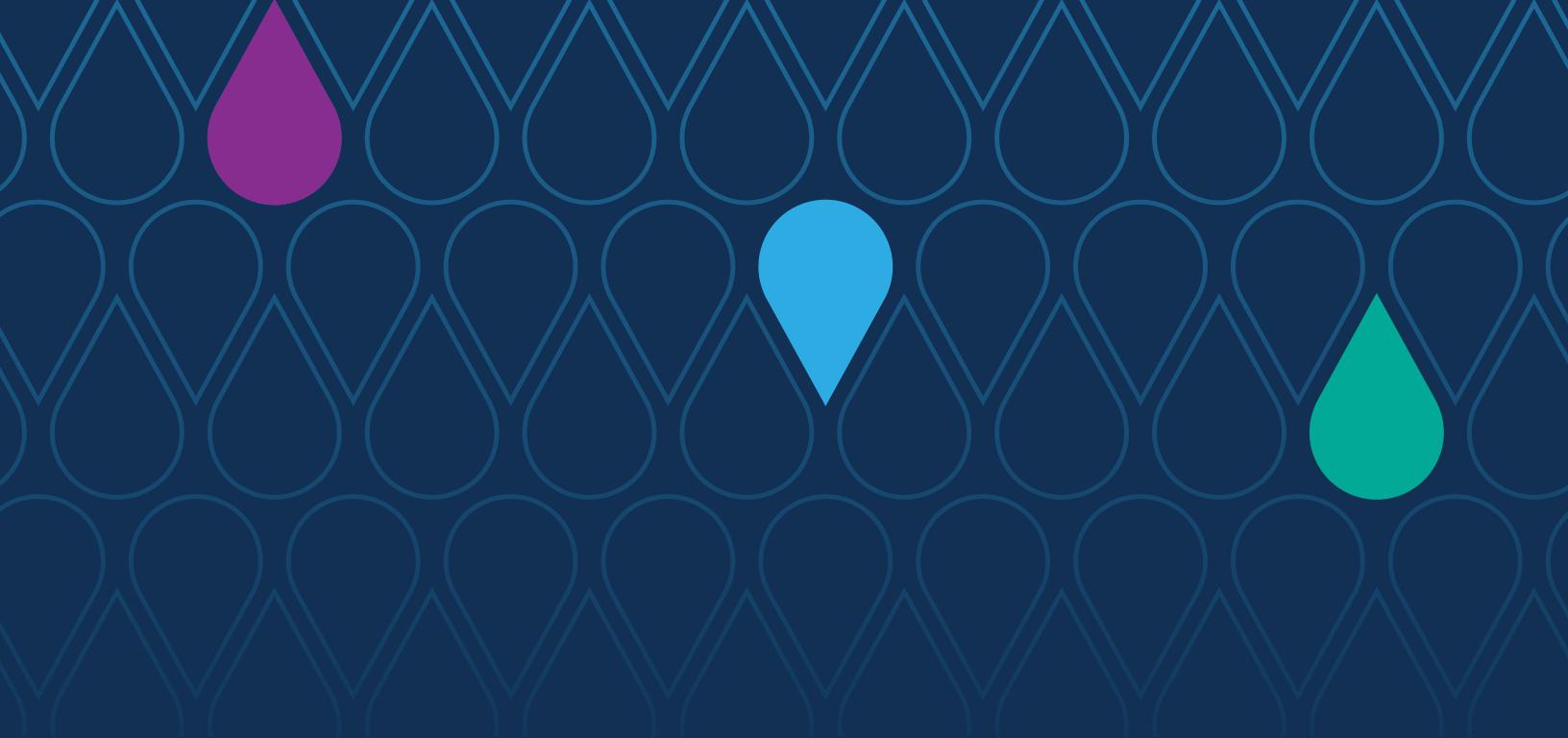
- We treat everyone with dignity and compassion
- We embrace diversity and pursue inclusion of backgrounds, identities, cultures, working styles and perspectives
- We remain humble in carrying out our mission
- We support the work-life balance of our colleagues across the globe
- We apply policy and standards with fairness and consistency
- We promote sustainable solutions in our operations and in our work environment



teamwork

We work together to achieve our goals

- We seek diverse views, perspectives and experiences
- We encourage challenging ideas and constructive disagreements
- We collaborate across boundaries and borders
- We collectively own team deliverables, decisions and accountabilities
- We celebrate and reward team successes



innovation

We learn and adapt to find better ways of doing things

- We challenge assumptions and take informed risks
- We approach our work with curiosity and passion
- We reflect on, and learn from, mistakes and failures
- We capture, apply and share knowledge consistently
- We ask for and learn from feedback

CONTACT EBC 24/7

Employees can seek advice directly from EBC staff during office hours or arrange to speak with team members at another convenient time. EBC maintains an email service account (ethics_HELPLINE@worldbank.org) accessible to staff that is advertised on the internal and external websites. Staff members can also contact the multilingual Ethics Helpline by phone (1-800-261-7497) 24/7.

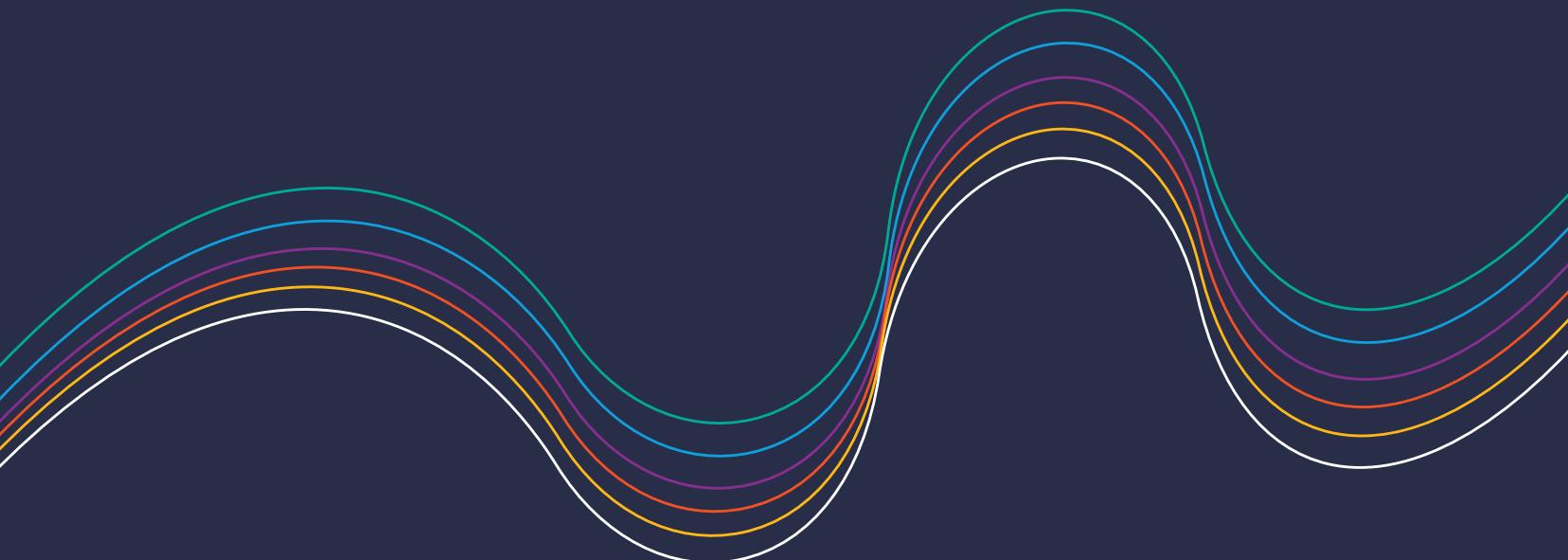
Advisory requests are treated with the highest possible level of confidentiality given the requirements of the case. Requests for advice can be made anonymously. For reports of suspected misconduct, all information is confidential and subject to disclosure on a strict need-to-know basis. Anonymous complaints are accepted.

Ethics and Business Conduct
ANNUAL REPORT 2021
Upholding Our Values to Improve Our Workplace Culture

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FAX: 202-522-3093

EMAIL: ethics_helpline@worldbank.org
ETHICS HELPLINE: 1-800-261-7497
(24 hours, 7 days a week; multiple languages)

INTRANET: <http://ethics.worldbank.org>
INTERNET: <http://www.worldbank.org/ethics>



Impact. Integrity. Respect. Teamwork. Innovation.

