

Ethics & Business Conduct Annual Report 2019

Promoting ethics and
our core values to
reach the World Bank
Group twin goals



Abbreviations and Acronyms

AHC	Anti-Harassment Coordinator	GPE	Global Partnership for Education
BIR	Business Integrity Review Unit of EBC	HRDVP	Human Resources Vice Presidency
CEO	Chief Executive Officer	IBRD	International Bank for Reconstruction and Development
CO	Country Office	IDA	International Development Association
COI	Conflict of Interest	ICSID	International Centre for Settlement of Investment Disputes
CRW	Creating a Respectful and Harassment-Free Workplace Training	IFC	International Finance Corporation
CSO	Civil Society Organization	IFI	International Financial Institution
DOI	Declaration of Interests	IJS	Internal Justice Services
EACC	Ethics and Anti-Corruption Commission of Kenya	ITS	Information and Technology Solutions
EAS	Ethics Advisory Services Unit of EBC	MDB	Multilateral Development Bank
EBC	Ethics and Business Conduct Department	MIGA	Multilateral Investment Guarantee Agency
EIB	European Investment Bank	MOPAN	Multilateral Organisation Performance Assessment Network
ENMO	Ethics Network of Multilateral Organizations	OIC	Outside Interests Committee
FCS	Fragile and Conflict States	OTV	Outreach, Training, and Values Unit of EBC
FCV	Fragility, Conflict, and Violence	SEA	Sexual Exploitation and Abuse
GBR	Global Business Review	SURR	Social, Urban, Rural, and Resilience Global Practice of the WB
GBV	Gender-Based Violence	WB	World Bank (IBRD and IDA)
GEF	Global Environment Facility	WBG	World Bank Group
GP	Global Practice		

Photos opposite page, top to bottom: Senior Program Officer II Sarah A. Raposa delivers CRW to IFC colleagues based in Washington, DC; Chennai-based vendors learn how to avoid conflicts of interest and to be aware of ethical issues related to their work; former World Bank Country Director for Myanmar Ellen Goldstein engages her staff at Creating a Respectful and Harassment-Free Workplace training seminar; WB staff based in Rome, Italy, participate in CRW training.



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The image features a dark blue background with two concentric circles in a lighter blue shade. A horizontal yellow line is positioned below the text. The text is centered and reads:

Who We Are
& What We Do



Ethics and Business Conduct Department

The Ethics and Business Conduct Department (EBC) contributes to the World Bank Group (WBG) strategy by guiding the WBG to embed ethics in everything the institution and its staff do. Grounded in excellence, prevention, trust and accountability, EBC is able to provide the safe, respectful, and values- and ethics-driven environment our diverse workforce needs to help achieve the WBG's twin goals: to eliminate extreme poverty and boost shared prosperity by 2030.

EBC is headed by the Chief Ethics Officer, who reports to the President of the WBG. For administrative matters, EBC reports to the Managing Director and Chief Administrative Officer.

EBC's three business lines—Outreach, Training, and Values (OTV); Ethics Advisory Services (EAS); and Business Integrity Review (BIR)—are responsible for maintaining our ethics-driven environment. Every year, thousands of WBG staff call on EBC for counsel and guidance. OTV

27

The diverse EBC staff who carry out these deliverables number 27 and hail from 19 countries.

delivers its original, engaging multimedia products institution wide both face to face and online. Training topics include sexual harassment, ethics awareness, the core values, managing conflicts of interest, and other timely subjects.

Every business day, the EAS team responds to an average of four requests for advice and direction on following the WBG values and complying with the Staff Rules and Principles of Staff Employment. BIR investigates allegations of staff misconduct and addresses each accusation during a preliminary inquiry to determine whether an investigation is required. When appropriate, BIR oversees investigations to determine whether enough evidence exists to warrant further action.

The diverse EBC staff who carry out these deliverables number 27 and hail from 19 countries. In fiscal year 2019, we added a new team member in the position of counsel. In addition, EBC created a new position in fiscal year 2019, Anti-Harassment Coordinator, which was filled in early fiscal year 2020 (see Special Section: Sexual Harassment, page 39).

Our seasoned staff have held positions at international finance institutions, other multilateral development banks, and the United Nations and in nearly all WBG institutions. EBC staff and consultants have varied specializations, in business, communications, compliance, conflicts of interest management, data analytics, education and training, employment and labor law, ethics, executive coaching and leadership, fraud and anti-corruption, harassment and sexual harassment, human resource management, international relations and public affairs, legal analysis, macroeconomics, management consulting, organizational development, and risk assessment.

As EBC pursues its role as a center of excellence for ethics, our dedicated staff play a critical role in our interactions with global development and financial partners. Together we are defining best practices in investigations, training, and advisory services, and setting the standards in business ethics—in the promotion of ethical attitudes and behaviors in all the activities of the institution. These practices are embedded in the decision making and in the evaluation of the relevance, impact, and efficiency of the department.



I am pleased to share the Ethics and Business Conduct Department (EBC) Annual Report for fiscal year 2019. Ethics is central to our mission and this report outlines how EBC works to uphold our ethics and values so the World Bank Group (WBG) can effectively and efficiently deliver on the mission to reduce poverty and improve living standards in developing countries. Our core values of respect, integrity, innovation, teamwork, and impact guide us each day in our work to help move countries forward with concrete outcomes.

EBC's new 2019–2021 Strategy addresses the needs of our staff by concentrating on prevention first, building trust, and striving for excellence. One of the first initiatives of President Malpass was to launch the WBG Action Plan for Preventing and Addressing Sexual Harassment—a plan driven forward by EBC and designed to ensure a respectful and harassment-free workplace. Harassment, including sexual harassment, has no place inside the WBG.

In addition, EBC made progress on several fronts this year. They decreased investigation time for sexual harassment and other misconducts, began regularly sharing with staff information on misconduct sanctions, and helped improve risk management in corporate decision-making. Recognizing that harassment remains the leading type of complaint to EBC, but rarely rises to the level of sanctionable misconduct, EBC led efforts to create the new Anti-Harassment Coordinator role to help stem harassment in all its forms. Also of note, EBC deepened its outreach and partnership with other international and multilateral organizations in the ethics and compliance field.

Our staff value EBC's guidance and effort, in collaboration with the WBG's internal justice system and other stakeholders, that seek to put our core values into practice. Only by working together do we ensure WBG remains a safe, just, ethics-driven, and values-based institution.

Let us all commit to lead by example and live our core values each day as we work to solve the toughest development challenges. Our colleagues, clients, shareholders, and partners are counting on it—and they deserve nothing less.

A handwritten signature in black ink, appearing to read 'Shaolin Yang', written in a cursive style.

Shaolin Yang
Managing Director and Chief Administrative Officer
The World Bank Group

Chief Ethics Officer's Message



Excellence, prevention, trust and accountability are the touchstones of the WBG's Ethics and Business Conduct Department. They are also the pillars of the new EBC 2019–2021 Strategy. In our strategy, we delineate the initiatives and detailed steps required, first and foremost, to encourage ethical conduct to prevent misconduct and to commit to reach beyond compliance to build our values-based culture.

One of the achievements of the past year was the Bank Group's response to sexual harassment within the institution through the WBG Action Plan for Preventing and Addressing Sexual Harassment, developed by EBC and launched in May 2019 by the President of the World Bank Group. The plan is grounded in our core values. It speaks to the WBG's ultimate objective: to ensure that the work environment is a safe place where staff can report sexual harassment, where witnesses to inappropriate behavior or harassment also feel safe to report it, and where managers act promptly to detect and address these cases.

Stepping up prevention in ethics includes providing timely advice, raising awareness, conducting training, monitoring trends, and implementing organizational culture change. Staff members increasingly rely on EBC's advice in such circumstances. In fiscal year 2019, EBC received more than a thousand requests for advice, which were answered in less than eight working hours on average. We significantly increased our training effort, by actively engaging more than 6,000 staff compared to 4,600 last year. EBC trained 63 country offices, either face-to-face or remotely.

The WBG made major strides toward bolstering trust among its workforce in fiscal year 2019. EBC considerably shortened the average time of investigations. And in May 2019, EBC began to regularly publish on the WBG intranet anonymized misconduct cases substantiated by EBC and sanctioned by the Human Resources Vice President. These measures are aimed to enhance trust, accountability, and transparency, prime factors in the EBC strategy.

EBC's participation in the Operational Risk Committee of the World Bank and the Procurement Committee of the World Bank Group have allowed us to create three specific indicators related to the risk of misconduct and fraud, which are now part of the regular reporting of operational risk both at the WB and IFC. We have also engaged with the Risk Management VPU, as well as other departments such as Treasury, to define risk tolerance and risk appetite related to the risk of misconduct and fraud. These are good examples of the value added of bringing ethics discussions to the core of everything we do at the WBG.

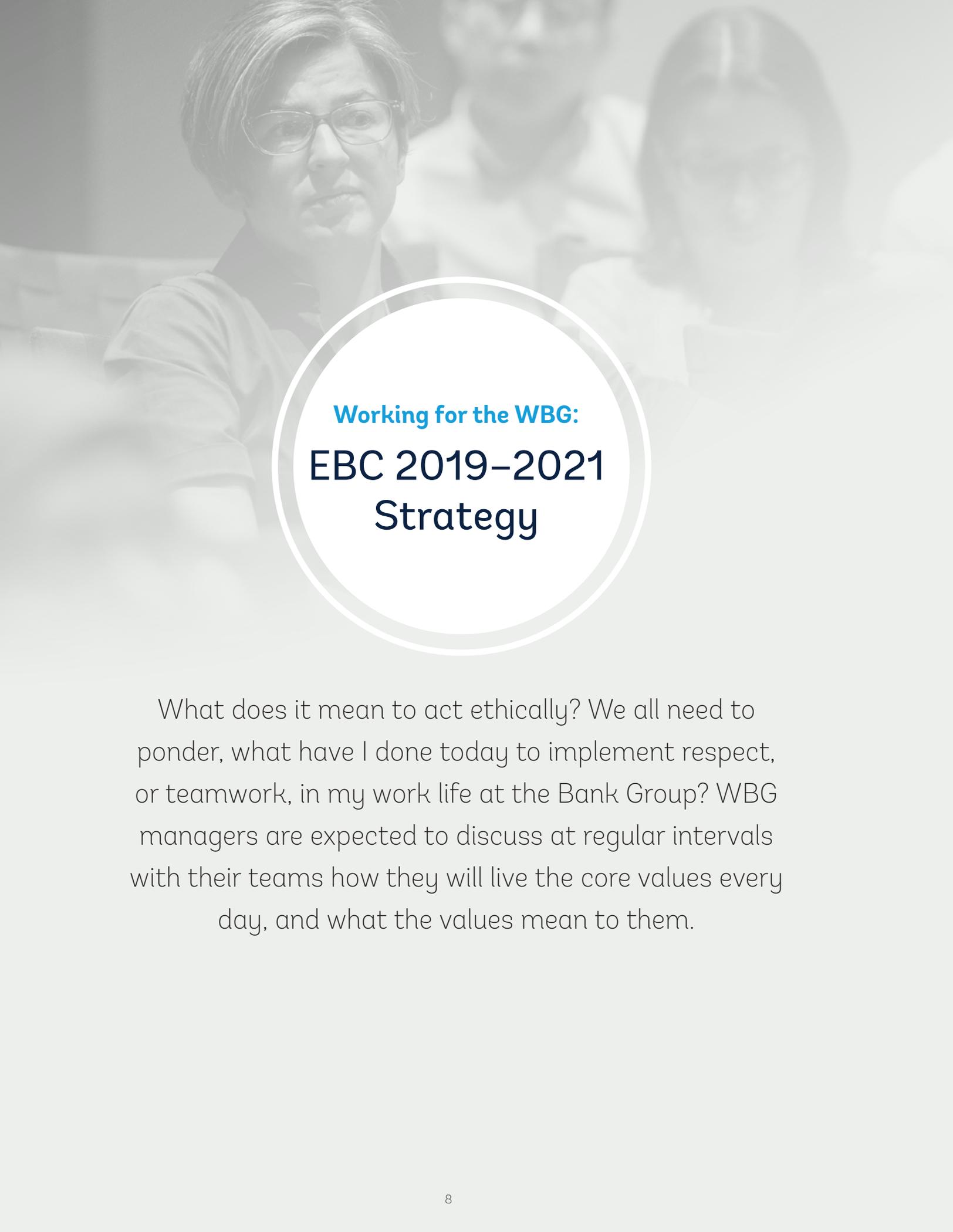
EBC is contributing to the WBG strategy as we strive to become a center of excellence in ethics. We are increasingly fostering relationships with organizations worldwide, especially international financial institutions and multilateral development banks. As the leading global development organization, the WBG has an obligation to be the ethics leader for our sibling establishments.

In fiscal year 2020, EBC will adopt the new Code of Ethics, an aspirational instead of a rules-driven document. We will also strive to dramatically step up outreach activities and simplify the Staff Rules. EBC plans to gradually grow our presence in country offices to better serve the needs of staff outside of Washington, DC. In the future, we will establish full-time onsite positions in different regions, starting with a pilot program in select cities in sub-Saharan Africa as well as the Europe and Central Asia region. I am committed to developing and implementing a strategy to prevent and address retaliation in the WBG. EBC will also put in place a sound monitoring system and evaluation framework focused on both the trends in the corporate culture and the impact of EBC's actions.

While EBC accomplished much in fiscal year 2019, in addition to our day-to-day operations, we have many necessary plans to implement going forward. Starting in fiscal year 2020, we will be reporting on our activities and results twice a year to the WBG Board's Human Resources Committee. I hope you enjoy reading this report.



Jorge Dajani
Chief Ethics Officer
The World Bank Group



Working for the WBG:
EBC 2019–2021
Strategy

What does it mean to act ethically? We all need to ponder, what have I done today to implement respect, or teamwork, in my work life at the Bank Group? WBG managers are expected to discuss at regular intervals with their teams how they will live the core values every day, and what the values mean to them.

Our Strategic Vision

The core values—impact, integrity, respect, teamwork, and innovation—refreshed in fiscal year 2018, sustain our new EBC 2019–2021 Strategy. This is stated in our two-prong strategic vision:

I. To be a trusted resource in preventing and addressing misconduct and encouraging appropriate behaviors through our core values.

EBC helps WBG staff reach beyond compliance. We promote a good values-based workplace where people are building an ethical culture. Changing the organizational culture requires us to always do what is best for our mission, our institution, and our staff. In this vein, EBC is increasingly focusing on addressing inappropriate behaviors before they become misconduct.

II. To lead the WBG to become an international reference in ethics.

EBC is defining its path as it helps the WBG to combine normative ethics and business strategy. The ultimate goals are for the WBG to foster an ethical model of development and for international organizations to define ethical objectives for their operations, and for all of us to care about ethical considerations when implementing complex investments and operations in developing countries. It speaks to how we achieve our mission through the core values, which inform our decisions and shape our relationships with our clients and our partners. It demonstrates that when we infuse the design, development, and implementation of our programs with our core values, we can accelerate progress toward our goals.

Our Strategic Mission

The new EBC mission statement is people-centered. It is about being fair, being efficient, being transparent, being the best, and being a step ahead.

- We support staff to embed ethics in everything the WBG does.
- We proactively focus on prevention and help to mitigate risks.
- We ensure that we address allegations efficiently, fairly, and in a transparent way.
- We are a center of excellence, providing the highest quality of service to our clients.

The Three Pillars of EBC's Strategy

A trio of mandates give structure to the three-year strategy:

1. **Step up prevention;**
2. **Enhance trust and accountability; and**
3. **Develop excellence.**



(From left to right): Front row : Dawn Mpati, Stella-Monica Mpande, Leonard Newmark, Trang Nguyen, Olesya Gafurova, and Lemlem Workalemahu. Back row : Selina Talengie Katenga-Kaunda, Jorge Dajani, Gabriela Beal, Bertrand Rossert ,and Stan Simpson. Not pictured: Audrey Sherpa, Bamidele Olugbuyi Sanya, Deepa Mahesh, Junko Saito, Kosta Nesterov, Sughe Jia, and Mary Anne Nicdao Magpoc.

PILLAR 1: Prevention

EBC’s Prevention Services

EBC’s prevention-oriented units, which provide training and advisory services, actively demonstrate that there are solutions other than investigation. Together, Outreach, Training, and Values (OTV) and Ethics Advisory Services (EAS) promote ethical behaviors by helping staff to live the core values of the institution. EBC aims to help people to be self-motivated to behave in a manner that is for the greater good. People need the right ethics tools to avoid, address, and resolve conflicts.

A New Code of Ethics

Who we are, what we stand for, and how we get things done. That’s what our core values are all about. They guide us as we pursue the WBG mission. Refreshed in 2018, the new core values necessitated a new Code of Ethics. We’ve introduced a critical word to the forthcoming document’s title: The Code of Ethics. The code is linked with our values, and it affects everyone.

After nearly a year of working and thinking hard, consulting with professional experts and brainstorming with people in departments throughout the Bank Group, then gathering

over 800 comments from more than 300 staff members to ensure that the new Code of Ethics reflects the culture we all aspire to, we are now ready to adopt our new Code of Ethics. We made sure we socialized it first.

The result will be a guide that is in line with today’s best practices, that is, aspirational rather than compliance focused. The Code of Ethics describes how we want our staff to work with one another and interact with others. It is a multi-year, multi-voice achievement.

An e-learning course on the values and the Code of Ethics intended for all WBG staff is in preparation to be rolled out in 2020.

CHART 1. Number of Staff Reached through In-Person or Virtual Training (per year)

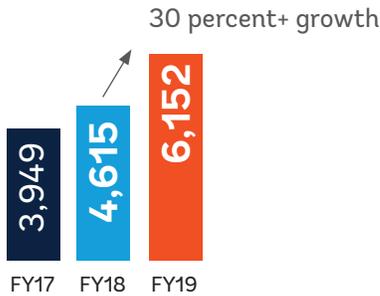


CHART 2. HQ and Country Office Staff Trained in FY19



Outreach, Training, and Values

Connecting with thousands throughout the WBG

EBC significantly increased the number of staff reached through face-to-face and virtual training, by more than 30 percent—from 4,615 in fiscal year 2018 to 6,152 in fiscal year 2019.

EBC also significantly increased the number of country offices reached in fiscal year 2019: 63 in face-to-face interactions, a jump from 33 in fiscal year 2018. The 39 country offices from which staff were reached in person were: Accra, Addis Ababa, Asunción, Bangkok, Beirut, Belgrade, Bogotá, Brasilia, Buenos Aires, Chennai, Dakar, Dhaka, Dubai, Georgetown, Guatemala City, Islamabad, Jakarta, Kampala, La Paz, Lilongwe, Lima, Managua, Mexico City, Monrovia, Montevideo, Nairobi, New Delhi, Panama City, Paris, Port-Au-Prince, Quito, Rome, Santo Domingo, San José, San Salvador, Singapore, Tegucigalpa, Vienna, and Yangon.

We reached 28 country offices via videoconference: Abuja, Addis Ababa, Algiers, Antananarivo, Bangkok, Bangui, Bujumbura, Conakry, Cotonou, Freetown, Johannesburg, Kampala, Kigali, Lagos, Libreville, Lilongwe, Lome, Maputo, Maseru, Moroni, N'Djamena, Niamey, Nouakchott, Ouagadougou, Rabat, Saint-Louis, Tunis, and Yaounde.

This past year, we have seen increasing evidence of the value that country offices are placing on such outreach and training activities, as our clients are starting to cover our costs in their budgets.

EBC Training Products and Offerings

In fiscal year 2019, EBC focused on combining our training products into a suite of offerings that meet various needs of different audiences.

Our main offerings include the following:

Ethics at the World Bank Group

This overview aims to raise ethics awareness and help staff understand and navigate the ethical dilemmas they'll inevitably face at various times during their WBG career. Staff learn about the WBG core values and ethical framework; managing conflicts of interest, ensuring proper use of assets and information, understanding workplace conflicts (including bullying and harassment), and where to get help on these issues. In fiscal year 2019, 2,113 staff participated in this engagement.

Creating a Respectful and Harassment-Free Workplace (CRW)

EBC's flagship product is a facilitated conversation that supports teams as they have an open, honest dialogue about what each member can do—individually and collectively—to contribute to building a culture of respect and civility. In fiscal year 2019, 2,469 staff participated in this engagement.

Participants share strategies for dealing with harassment, sexual harassment, and unwelcome behaviors more broadly from four perspectives: (1) the person who feels harassed; (2) the person told he or she is engaging in harassment; (3) a witness/bystander; and (4) the manager. Over 5,000 staff have participated in this workshop since we began offering it, in early 2017. CRW received extremely positive feedback from leaders and staff who attended it. EBC developed an internal video of leaders across the Bank Group who shared their perspectives on CRW and insights into the facilitated conversations that took place during the workshop.

TABLE 1. In-Person and Virtual Training in FY19

6,152

3,554 DC staff

2,598 Country office staff



2,113

Ethics Awareness



2,469

Creating a Respectful and Harassment-Free Workplace



1,175

External Speaker Events



395

Tailored Offerings





WBG staff discuss issues in the workplace at an Ethics-At-Work learning session, in February 2019, titled “How Power & Success Derail Us and What to Do About It.”

795

In FY19, 795 people **accessed the course “Conflict of Interest Risk Management for Your Project,”** targeted for both staff and their client partners. That’s a dramatic increase from the 48 staff and 77 external participants who completed the course in FY18.

Managing Harassment and Sexual Harassment in Your Work Environment: A Conversation with Managers

EBC developed in 2018 this new course specifically for managers to (1) help them understand their roles and responsibilities in handling harassment and sexual harassment; (2) know what WBG resources are available to support them; (3) know more about EBC’s misconduct review process so they can better guide their staff; and (4) share strategies among themselves on how to handle difficult situations through case studies. In fiscal year 2019, 59 managers participated in the pilot of the program that will be rolled out in fiscal year 2020.

Team Conversation on WBG Core Values

The WBG core values, refreshed and relaunched in 2018, have been communicated widely. But what do they mean, and how should they apply to our daily work life? This facilitated conversation helps teams engage in a deeper discussion about how the values apply in their specific context and work environment. The outcome of the conversation forms a strong foundation for living the values and bolstering team culture. In fiscal year 2019, 318 staff participated in this engagement.

Conflict of Interest Risk Management for Your Project

An online product, developed in 2018 for ethical breach prevention, “Conflict of Interest Risk Management for Your Project,” targeted for both staff and their client partners, continues to be highly rated and attract participants. As of June 2019, 795 people accessed the course and are now part of the course community, which is a dramatic increase from the 48 staff and 77 external participants who had completed the course in fiscal year 2018.

Ethics Advisory Services: Helping WBG Staff Avoid Conflicts of Interest

EBC's Advisory Services responded to 1,053 requests for advice on conflict of interest (COI) queries in fiscal year 2019, marking a steady increase in the past four consecutive fiscal years. That's a 14 percent increase over 2018, with 925 queries received and solved, and 35 percent higher than the 777 received in fiscal year 2016 (846 received in fiscal year 2017). Advisory Services is another EBC prevention tool for staff.

Thirty-four percent of all queries received related to questions about outside activities and outside employment. This includes questions about holding board positions in outside entities, teaching, and publishing. About 11 percent of the queries received related to relationships, and included questions about the recruitment of relatives of staff by the WBG, the assignment of spouses or domestic partners also at the WBG, and romantic relationships between staff members.

In addition to supporting people facing such ethical dilemmas, essentially our advisory services answer questions—with a helpful, straightforward “yes” or “no”—and ask questions—to ensure compliance with the Declaration of Interests (DOI) programs. We also manage the EBC helpline.



1,053

EBC's Advisory Services responded to 1,053 requests for **advice on conflict of interest (COI)** queries in fiscal year 2019, marking a steady increase in the past four consecutive fiscal years.

EBC achieved its ambitious target in fiscal year 2019: the team answered staff queries within eight working hours on average. Ninety percent of questions were fielded within 24 to 48 hours, a significant accomplishment considering the dramatic increase in requests from a year ago, with the fiscal year 2019 count of 1,053.

The trend of people asking more and more questions probably comes with working in the more challenging environment of today. It may also be due in part to EAS's friendlier, more proactive service approach honed during the past few years. EBC also observes that staff who attend ethics training sessions tend to ask specific personal questions at the end of the sessions.

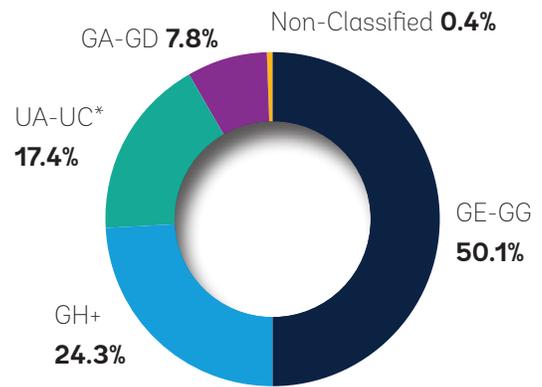
TABLE 2. EAS Advice Given by Category in FY16–FY19

Subcategory	FY16	FY17	FY18	FY19
Outside Activities and Employment	284	311	317	362
Future or Former Employment	112	103	94	115
Close Relatives/ Relationships	112	112	129	121
Vendor Procurement	50	60	95	110
External Services	48	48	42	38
Gifts, Medals, and Honors	42	47	61	74
Personal Financial Interests	20	17	21	16
Public Statements and Disclosures	32	40	63	51
Operational	29	20	6	19
Other	48	88	97	147
Total	777	846	925	1,053

<8 hours

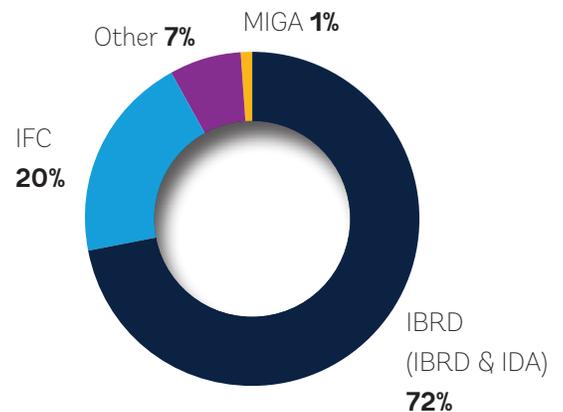
EBC achieved its ambitious target in fiscal year 2019: the team **answered staff queries within eight working hours** on average.

CHART 3. EAS Consultations by Grade Level in FY19



*UA-UC grades are designated for JPA, the Chair of the Staff Association, Staff on Special Assignments, as well as staff hired through the partnership programs (i.e., Donor Funded JPOs, Saudi Recruitment, Global or Voice Secondment). Source: HR's Quarterly Business Reports.

CHART 4. EAS Advice Given per Institution, FY19



Declaration of Interests Programs

Demonstrating ethical leadership and strong governance are essential to the mission of the Bank Group. This requires systematic and efficient review of perceived and actual conflicts of interest.

EBC manages the two Declaration of Interests (DOI) programs—the Senior Leaders DOI program and the Staff DOI program—which are designed to mitigate real or perceived conflict of interest risks.

Senior Leaders Declaration of Interests

The Senior Leaders Disclosure of Interests program required the 47 most senior individuals in the organization in fiscal year 2019, including the WBG President, to complete a declaration of their financial interests and outside occupations. The senior financial disclosure forms are then summarized by EAS staff, posted on the intranet, and publicly posted on the WBG external website. Review of the senior-level DOIs was completed in April 2019. This practice demonstrates our transparency and accountability to staff, stakeholders, and clients.

All new vice presidents receive individual briefings at the start of their appointment on compliance with the conflict of interest requirements of the WBG. A new, important adjustment to the program is the immediate declaration of interests by newly recruited or promoted senior staff, thereby reducing the chance of a conflict of interest.

Staff Declaration of Interests

In fiscal year 2019, EAS set up an onboarding DOI program for all people hired from outside the Bank Group at the GH or GI levels, and those promoted from within the Bank Group to GH levels. These individuals complete a DOI within 30 days from the date of their onboarding. In fiscal year 2019, 25 staff members were requested to complete the

100%

Staff required to file a DOI fulfilled their obligation in fiscal year 2019.



EBC hosts CRW in Yangon, Myanmar, as part of the department's outreach to staff in FCS.

TABLE 3. Staff DOI Program Results in FY18 and FY19

FY18 Staff Annual DOI Program		
	Number	Percent
Number of Filers in Total	2,466	100%
DOIs closed at initial review	2,184	88.6%
DOIs that required further review	282	11.4%
Of which, follow-ups with filers	69	2.8%
FY19 Staff Annual DOI Program (ongoing)		
	Number	Percent
Number of Filers in Total	2,392	100%
Closed by the end of FY19	2,319	97%
DOIs closed at initial review	2,198	91.9%
DOIs that required further review	121	5.1%
Of which, follow-ups with filers	56	2.3%

TABLE 4. Staff Annual DOI Program, FY18

Of the 69 cases that required follow-up:

Resolution	Count of Resolution
Disclose and recuse	0
Disclose	0
Divest	0
Freeze	0
Other	5
Provide advice and guidance	21
Request information	43
Seek manager/OIC approval	0

onboarding DOI. The Staff Annual DOI program also required declarations, from the 2,392 manager-level staff members in fiscal year 2019, as well as designated staff in sensitive roles. They completed a confidential declaration of their financial interests and outside occupations.

EBC annually reviews forms submitted by filers to identify potential conflict of interest risks. Where risks have been identified, the team follows up with the staff member to provide recommendations on mitigation measures or how to resolve the potential conflicts of interest. In general, EBC's follow-up techniques vary from a request for further information or instructions to make disclosure of the relevant facts to management, to providing a recusal strategy and, in severe cases, a recommendation to divest assets that pose the conflicts of interest.

Table 3 shows the benefits of having an annual program: cases are identified early and do not require the more drastic measures such as divestment, which were needed originally when the program was established 10 years ago. EBC tends to develop a cooperative approach of working together with the filers, who are generally willing to do what is required to be compliant with the rules.

In fiscal year 2019, 100 percent of the staff required to file a DOI fulfilled their obligation to file. At the close of fiscal year 2019, EAS had completed the review of 97 percent of the submissions.

Without compromising the quality of the reviews, the team has also managed to increase productivity and expects the fiscal year 2019 program to be completed earlier than in previous years.

EBC made a notable contribution to the bottom line in fiscal year 2019 by reducing the DOI programs' cost to their lowest yet: an almost 90 percent reduction, from fiscal year 2014 to fiscal year 2019.

EBC Streamlines WBG Staff Rules

A primary EBC objective is to streamline and simplify the Staff Rules. Meeting that objective began in fiscal year 2019 when we abolished the Outside Interests Committee (OIC), some 20 years old, even preceding EBC. The department reached consensus with all stakeholders for this action, giving decision-making authority to the Chief Ethics Officer, who will, whenever necessary, take advice from relevant units in complex or delicate cases. The process will therefore be faster and simpler for staff and make the WBG more agile.

Into the Future

EBC will work with other departments to further simplify the staff rules in fiscal year 2020. The Action Plan for Preventing and Addressing Sexual Harassment incorporates a number of rules that will need to be clarified or adopted in fiscal year 2020.

Clarifying the staff rules will simplify the process of leaving the WBG. EBC will reintroduce exit interviews with departing vice presidents and directors. These interviews with senior management come on top of the exit interviews traditionally performed by HR functions and are a good way of gathering feedback specific to ethics. This will allow the WBG to learn the reasons for their leaving the Bank Group, as well as to inform the former employees of the “cooling-off” policies. Exit interviews are a best practice in most international institutions.



EBC Counsel Kosta Nesterov listens to keynote speaker Dr. Katz in May 2019 at a learning event titled “Men and #MeToo: Possibilities and Perils in a Time of Change.”

New plan

In fiscal year 2020, EBC will adopt or clarify staff rules to support the new Action Plan for Preventing and Addressing Sexual Harassment at the WBG.

External Partnerships

EBC provided advisory services not only to the Global Environment Facility (GEF) secretariat and Global Partnership for Education (GPE) but also to the Boards of GEF and GPE. In particular, EBC participated in a session of the Governance and Ethics Committee of the GPE Board, focusing on the implementation of the Code of Conduct of the Board of GPE and the DOI program for the GEF.

In partnership with the GEF, for the past three years EBC has acted as Ethics Officer of its Ethics Committee and implemented the DOI program for its Council. In fiscal year 2019, EBC launched the annual GEF DOI program, on August 15, 2018. This was applicable to 84 Covered Individuals (that is, GEF Council Members, Alternates, and Advisers, representing the 32 Constituencies that comprise the GEF); who were required to file a GEF DOI referring to the reporting period: July 1, 2017, to June 30, 2018. The submission deadline for such reporting obligations was October 1, 2018. On November 19, 2018, EBC collected all the GEF DOI forms, accomplishing 100 percent compliance with the exercise, and completed the review process, with no conflicts-of-interest findings.

Training and Staff Engagement Products

EBC equips staff with the tools needed to navigate difficult situations and make ethical decisions: skills and frameworks. We provide knowledge and understanding of our core values, ethical issues, and of the WBG's ethical and behavioral expectations as a foundation. And EBC promotes strong, ethical, and values-based mindsets throughout the WBG over time.

Ethics-at-Work Learning Series

Through the Ethics-at-Work Learning Series, EBC invites external speakers to engage with staff on current topics of interest, communicating about ethics in ways that can be practically applied in the workplace. This year we held three sessions, in partnership with the Staff Association, in Washington, DC, with a total of 747 staff in attendance, and addressed common staff workplace concerns raised during Refreshing Our Values focus group discussions. The sessions in Washington, DC, were:

- **“How to Stay Psychologically Healthy at Work,”** October 30, 2018, Guy Winch, licensed psychologist and author
- **“How Power and Success Derail Us and What to Do About It,”** February 11, 2019, Darko Lovric, Principal, Incandescent
- **“Credit and Blame at Work,”** May 22, 2019, Ben Dattner, Principal, Dattner Consulting
- **Given the importance of preventing and addressing sexual harassment at the World Bank Group, this past fiscal year we held two speaker events focused on this topic:**
 - **“Bystander Intervention,”** November 8, 2018, Dr. Kavita Avula and Dr. Sabrina Crawford, clinical psychologists
 - **“Men and #MeToo: Possibilities and Perils in a Time of Change,”** May 28, 2019, Dr. Jackson Katz, author and filmmaker

EBC's New Role in WBG Corporate Activities: Helping to Manage Risk

EBC became more involved in prevention throughout the Bank Group this fiscal year.

EBC has been actively represented in the WBG procurement committee, ensuring that conflicts of interest and the prevention of sexual harassment, exploitation, and abuse are adequately addressed both within the WBG and by vendors. The Chief Ethics Officer also participates in the Enterprise Risk Committee of the WBG and the World Bank's Operational Risk Committee, and EBC has actively participated in the definition of risk tolerance and risk appetite, specifically in relation to allegations of misconduct and fraud. Separately, EBC contributes to IFC's operational risk report. The Chief Ethics Officer is also a member of the Real Estate Committee of the WBG and of the new Operations and Corporate IT Business Committee. This committee has the mandate to support the digital transformation of business so that Bank staff have a simpler, more integrated, and optimized experience with operations and corporate systems.

In May 2019, EBC was asked to participate in the WBG Emergency Management Team (EMT), which coordinates the management of crises for the Bank Group. EBC's participation in the EMT is another step forward in our strategy to be proactive in key areas, embedding ethics in operations and other parts of our institution. Typical organizational emergencies, such as cyberattacks and epidemic contamination of staff, which presents the ethical dilemma of whether to evacuate an infected staff member to his or her home country, have an ethical angle that deserves to be addressed as such.

Managing Crises

In May 2019, EBC was asked to participate in the WBG Emergency Management Team. Helping to manage crises for the WBG is another step forward in our strategy to be proactive in key areas, embedding ethics in operations and other parts of our institution.

Joint outreach with Internal Justice Services

EBC co-chairs the IJS Outreach Working Group, which consists of other IJS offices, to ensure that outreach to staff across the WBG, particularly in country offices, is coordinated and comprehensive. This past fiscal year, the working group made strides toward reaching every country office during a two-year period.

- EBC has partnered with specific groups, such as the Millennial Resource Group at IFC, to pilot a training product on navigating difficult situations at work, developed specifically for younger staff at the WBG.
- EBC, in collaboration with the SURR Global Practice, launched a series of seven short videos aimed at raising awareness among GP staff of all the tools to



Senior Ethics Officer Deepa Mahesh, based in Chennai, India, delivers Ethics Awareness training to managers of contractors.

avoid misconduct available to them from EBC. The videos in the series were shared with 700 GP staff in 30 offices in April, May, and June 2019. They are available on the WBG intranet.

- **We also continue to partner with the Ombuds office to deliver a focused training for Respectful Workplace Advisors, emphasizing their role in creating a respectful and harassment-free workplace (CRW).**

In order to increase our ability to deliver CRW, in fiscal year 2019, we recruited and trained a number of colleagues from other units, including the Ombuds office, HR, and other parts of EBC, to become CRW facilitators.

Outreach with contractors

In Chennai, the WBG relies heavily on contractors to deliver key services related to ITS, Procurement, General Services, and others. Recognizing that vendor employees—especially those who work on our premises—may not be aware of some of their rights and obligations, EBC has worked with ITS, Legal, and Procurement to develop training content, and has delivered it to representatives of our main vendor companies, both in Chennai and Nairobi.



In May 2019, a WBG staff member asks Ethics-at-Work learning session keynote speaker Ben Dattner about credit and blame in the workplace.

Into the Future

EBC's priorities related to outreach and training in fiscal year 2020 and beyond include:

- rolling out an e-learning module to help staff become familiar with the new Code of Ethics;
- planning Ethics-at-Work and other speakers for next year;
- expanding training to vendor companies, so that vendor employees globally are aware of their rights and obligations;
- significantly increasing rollout of our training offerings, focusing heavily on training for managers;
- developing and rolling out a “refresher” online module on preventing and addressing sexual harassment as part of our ongoing emphasis on this topic;
- developing a series of short “burst” learning modules to be disseminated virtually, on some key ethics and compliance issues like avoiding conflicts of interest or tips on how to address sexual harassment that staff tend to be unaware of or often have questions about; and
- working on ways to leverage more resources for country offices.



In March 2019, WBG Nairobi-based staff share their experiences working in a country office. During visits to country offices, the Chief Ethics Officer and members of his management team generally meet with female staff, administrative and client support (ACS) colleagues, and short-term consultants to get the pulse of the local office environment.

In the Field: Increased EBC Presence in the Regions

As part of the WBG strategy, EBC aims to expand its presence in several regions and represent EBC more broadly, beginning with Africa and in the new shared service hub in Sofia. Over the ensuing years, we must position our human resources on a truly global scale, focusing more on vulnerable countries where every day is a struggle for the people who are surviving there. In the meantime, EBC is stepping up travel to country offices—we need to have more people on the ground. This helps us to be closer to staff in the field to answer their questions and to help them better access our services.

One-On-One with Country Offices

The Chief Ethics Officer visits country offices to familiarize staff with the services provided by the department, including ethical advisory services, outreach and training, and investigations, and with such current EBC initiatives as our forthcoming values-based Code of Ethics and the 2019 Action Plan for Preventing and Addressing Sexual Harassment. Among the 2019 visits were Belgium, India, Kenya, Luxembourg, Morocco, Sweden, and the United Kingdom.

Separately, EBC's OTV team delivered face-to-face training to 39 country offices in fiscal 2019, and videoconference sessions took place in 28 offices. In line with EBC strategy responding to a request of the Global Business Review (GBR), EBC is organizing one in-person training in fiscal year 2020 for everyone who did not receive live training in fiscal year 2018 or 2019.

The Benefits of Being There

By having officers in the Chennai and Nairobi country offices, EBC reaches more countries in the South Asia and African regional bases. EBC staff stationed in the two country offices promote the core values and respond to ethical queries. The country offices provided trainings such as Ethics Awareness, Creating a Respectful and Harassment-Free Workplace, corporate onboarding for new staff, and the Ethics-at-Work learning series—to 1,848* participants, as well as customized presentations on WBG staff rules and core values. These sessions were given face to face and via videoconference.

To support specialized onboarding for staff based in Fragile, Conflict, and Violence (FCV) countries, in late January to early February 2019, EBC brought ethics-related modules to staff in both the Dubai and Beirut country offices. In Dubai, EBC led CRW and Ethics Awareness discussions on two consecutive days, reaching 38 staff. In Beirut, at the request of the Human Resources Vice Presidency, EBC supported its delivery of the Fragile and Conflict States (FCS) Onboarding Orientation program to 36 colleagues. This is the fourth time that EBC has supported this onboarding by providing a specialized module that addresses our corporate rights and responsibilities, and the impact that this may have on staff based in these countries.

Ethics Awareness and CRW sessions were presented at the Rome and Belgrade country offices in May 2019, as was CRW during an Agriculture Global Practice retreat. To deepen EBC's engagement with country offices, a trainer delivered an Ethics Awareness workshop to the Nairobi-based staff of the Country Management Unit. The trainer has reached an agreement with the Ministry of the Treasury of Kenya to deliver Ethics Awareness sessions.



In June 2019, Bamidele Sanya was a guest lecturer at the University of Nairobi School of Law, where he gave a talk on Internal Justice and Ethics at the World Bank.

EBC's Presence in Nairobi

Outreach and training

The Nairobi EBC presence leverages its collaboration with the regional HR business partners and the management in country offices to deliver a wide array of training and outreach activities not only to raise general awareness around ethical issues, but also to respond to specific country offices' needs and challenges.

Trainings including Ethics Awareness, CRW, corporate onboarding sessions for new staff, and customized presentations on WBG rules and core values were presented

to 22 African countries and one in South Asia in fiscal year 2019: Bangladesh, Benin, Burkina Faso, Cameroon, Central African Republic, Chad, Comoros, Gabon, Ghana, Guinea, Lesotho, Madagascar, Malawi, Mauritania, Mauritius, Mozambique, Kenya, Niger, Nigeria, Sierra Leone, South Africa, Togo, and Uganda.

Two Ethics-at-Work Learning Series events took place:

- **“Ethical Leadership in Business,” with speaker Edward Okundi, PhD, Civil Engineering, Imperial College, University of London, and CEO, Maxwell Stamp Ltd.; 39 participants; October 2018, Nairobi country office**
- **“Creating a Meaningful Workplace,” with speaker Dr. Vincent Ogutu, Vice Chancellor Designate, Strathmore University, Nairobi, Kenya; 75 participants; May 2019, Nairobi country office linking to Kigali, Rwanda, Kampala, and Uganda country offices**

Ethics Advisory Services and Business Integrity Review

In fiscal year 2019, EBC in Nairobi responded to 62 requests for ethical guidance on conflicts of interest (COI). These involved: (1) outside employment and activities; (2) gifts and hospitality; (3) future or former employment; (4) public statement and disclosures; and (5) close relatives.

A post-investigation mission to the Bangladesh country office addressed issues that arose following a Business Integrity Review (BIR). This mission included meetings with management and staff.

EBC’s Presence in Chennai

Outreach and training

EBC’s presence in the Chennai office has helped to deliver a wide range of training and outreach activities such as Ethics Awareness, CRW, and corporate onboarding sessions for staff in Chennai and other country offices such as Bangkok, Islamabad, Jakarta, New Delhi, and Singapore in the East and South Asia regions. EBC, in collaboration with our regional HR business partners, delivered customized sessions combining WBG core values and culture to team leaders and supervisors in Chennai. These sessions helped raise general awareness about various ethical issues and aided in operationalizing WBG core values.

Enhanced ethical advisory support was made available to staff in the Chennai, Mumbai, and New Delhi offices. EBC provided guidance and advice on various conflict-of-interest issues, responding to staff queries and supporting the Staff Declaration of Interest program, in an effective and efficient manner.

To reach out to the 450+ vendor employees who work out of the Chennai office, EBC, in partnership with Corporate Procurement and in collaboration with ITS and Legal, developed a customized training on “Ethics Awareness for Vendor Employees.” This was first piloted and rolled out successfully in Chennai and is now being extended to offsite vendor employees (covering approximately 1,000+ vendor employees). Further, to ensure that these sessions make an impact, EBC’s presence is guaranteed in all the sessions delivered by the vendor representatives to their staff.



PILLAR 2: Trust and Accountability

Business Integrity Review

EBC is committed to walking the talk, and being a partner everyone at the WBG can trust. The Business Integrity Review (BIR) unit addresses allegations of misconduct efficiently, fairly, and in a transparent way. The unit is a trusted resource in addressing misconduct.

In fiscal year 2019, EBC and the investigations team substantiated six sexual harassment cases. And we did so by substantially reducing the average length of investigations (see Special Report: Sexual Harassment, page 39). EBC also exhibited transparency and accountability and reinforced our credibility by publishing on the WBG intranet the past three years of cases substantiated by EBC and sanctioned by the Human Resources Vice President, including case description, type of sanction, and subject grade level. Going forward, such cases will be published quarterly.

(From left to right): Front row: Suzan Sgaier, Simisola Morenike Adejumo, Yazid Al-Eryani, Jodi Glasow, and Lemlem Workalemahu. Back row: Adebisi Oyelade, Jorge Dajani, Ashok Arjun Rau, Sylvia Winborne, Adrienne Toomey, and Jules Baughns. Not pictured are: Doreen Lulu Kapakasa, Jose Luis Martinez Rivera, Philip Godfrey Caine, and Yasmeen Nasser Al Tabbaa.

BIR took the lead

in coordinating the creation and adoption of a policy for the Workplace Violence Committee and procedures for identifying and addressing workplace violence, with Human Resources, Legal, Internal Justice Services, and the Health and Safety Directorate.

Exchanging Ideas and Achieving Beneficial Outcomes

Several productive recommendations for the investigations team came out of the fiscal year 2018 external review of the WBG's policies and procedures by international experts. One was the creation and hiring of an Anti-Harassment Coordinator (AHC) in early fiscal year 2020, who resides in EBC and reports directly to the Chief Ethics Officer (see "Special Report: Sexual Harassment," page 39). Along with the AHC, EBC recruited an additional investigator, who specializes in investigating sexual harassment cases, to round out the team. This action was also initiated on the recommendation of the expert panel.

Activities Beyond Investigations

EBC worked with several other departments during fiscal year 2019. In a notable example, BIR took the lead in coordinating the creation and adoption of a policy for the Workplace Violence Committee and procedures for identifying and addressing workplace violence, with Human Resources, Legal, Internal Justice Services, and the Health and Safety Directorate. It was an antidote to information lacking for staff that is connected to ethics: when, for example, a physical assault or the threat thereof occurs in the workplace, staff need clear guidance on where to seek assistance, how to report the incident, and how the incident will be handled.

Partnering with Outreach, Training, and Values, investigators visit country offices to present *Creating a Respectful and Harassment-Free Workplace* and other trainings in the field. In addition, in June 2019, BIR sent an investigative analyst to Nairobi for one month to assist in delivering outreach and training, and to work directly with staff by providing advice and guidance on ethical issues.

EBC works with others externally as well. EBC represents the Bank Group on the United Nations (UN) Chief Executive Board Sexual Harassment Task Force, which in fiscal year 2019 produced a number of deliverables, including a policy framework that is being widely adopted among the different UN agencies. The manager of the BIR unit also serves on the Steering Committee on the UN Task Force Sub-Group for Strengthening Investigatory Capacity.

Other fiscal year 2019 initiatives with external stakeholders included:

- An investigator represented EBC at the Conference of International Investigators in November 2018 in South Korea and also conducted a workshop.
- The BIR manager participated in the joint meeting of the Task Force and the Inter-Agency Standing Committee members with heads of investigatory bodies.
- EBC delivered a training to practitioners on addressing and resolving harassment and sexual harassment at the International Labour Organization's workshop on Managing Employment Disputes Effectively in International Organizations.
- We delivered a training to practitioners on harassment and sexual harassment at the Ethics Network of Multilateral Organizations (ENMO) annual meeting; EBC is a member of the Membership Committee of ENMO.

Into the Future

EBC is currently revisiting its intake mechanism to be more efficient and streamlined in the future. More importantly, we strive to be more client oriented by understanding individual staff members' objectives for coming to EBC and how best to address and resolve their concerns. A better diagnosis at the front end will result in a better resolution process.

The EBC Allegations Review Process

The process of reviewing an allegation of misconduct involves four stages: (1) intake; (2) preliminary inquiry; (3) investigation; and (4) report.

1. Intake. Upon receipt of an allegation, EBC assesses the information gathered to determine whether the complaint, if proven, would constitute misconduct under Staff Rule 3.00. If it does not, EBC may refer the complaint to other appropriate areas of the WBG, such as the IJS or line management, to address the matter. EBC also may offer guidance, consultation, or advice if the complaint is not suitable for review through an investigation. In fiscal year 2019, 123 allegations of misconduct were closed at the intake stage.

2. Preliminary Inquiry. If an allegation is within EBC's mandate and a less formal intervention is not appropriate, EBC conducts a preliminary inquiry to determine whether there is a sufficient basis for a formal investigation of the allegation. At this stage, EBC seeks to discover the facts of the case by collecting evidence, including interviewing witnesses and reviewing documents. During this stage, EBC assesses the allegation to determine if the evidence is credible and verifiable. In fiscal year 2019, 74 allegations of misconduct were closed at the preliminary inquiry stage.

TABLE 5. Allegations Substantiated by EBC that Resulted in Reports to HRDVP in FY17–FY19

Cases	FY17	FY18	FY19
Abuse of Authority	0	2	0
Discrimination	0	0	0
G-5 Domestic	1	2	0
Harassment	1	7	1
Misuse of Bank Resources	6	1	4
Non-Compliance with Staff Rules	8	3	7
Personal Legal Obligation	0	0	0
Sexual Harassment	2	4	6
Sexual Exploitation and Abuse	0	0	1
Total	18	19	19

Table highlights:

- In fiscal year 2019, EBC substantiated an allegation of sexual exploitation and abuse under the newly revised SR 3.00, paragraph 6.01.
- In fiscal year 2019, EBC saw a significant increase in the number of sexual harassment cases substantiated, partly as a result of witnesses coming forward more readily, as well as EBC’s ability to provide consultation and advice about the Bank Group’s prohibition of retaliation for assisting an EBC investigation.

3. Investigation. When EBC finds a sufficient credible basis for investigating the allegation, the department begins a formal process. A written Notice of Alleged Misconduct is issued to the subject to inform him or her of the allegations and seek a response. An investigation enables EBC to establish whether there is strong enough evidence of misconduct or whether the case should be closed. In fiscal year 2019, 17 allegations of misconduct were closed at the investigatory stage.

4. Report. After the formal investigation stage, if EBC determines that there is sufficient evidence to support an allegation of misconduct, EBC prepares a report of its findings and sends it to the WBG’s Human Resources Vice President for review. HRDVP in turn reviews EBC’s report carefully and determines if the evidence supports a finding of misconduct, and if so, determines the appropriate disciplinary sanction. In fiscal year 2019, 19 reports were sent to HRDVP for its determination.

Out of 233 allegations closed in fiscal year 2019, EBC closed 197 before proceeding with a formal investigation (that is, 197 allegations were closed at intake or during a preliminary inquiry). This number partly reflects increased confidence by staff and managers to bring forward allegations. It is also a partial reflection of EBC’s current practice to address and solve concerns at the initial stage, especially in cases of inappropriate behaviors that do not rise to the level of misconduct. We anticipate that the newly recruited Anti-Harassment Coordinator, who addresses cases related to harassment and sexual harassment, will increase the number of cases that can be resolved informally before referring the matter to the investigatory team for review. Out of the 36 cases for which EBC opened an investigation, EBC substantiated 19 cases (more than 50 percent). In some cases, such as fraud allegations where documentary evidence exists, this rate can be significantly higher; in other cases, such as

harassment where there is limited, if any, corroborating evidence, the number of allegations that meet the standard may be lower.

- In fiscal year 2019, BIR closed 123 cases at intake, a further 74 cases during the preliminary inquiry, and 17 cases closed at investigation. Nineteen cases were referred to the HRDVP (see Chart 5).
- In line with our objective to reduce the duration of investigations, the time dropped from 227 days in fiscal year 2018 to 175 in fiscal year 2019. EBC’s goal is to reduce the average investigation completion time to 130 days by fiscal year 2021.
- EBC made progress toward its goal of shortening the length of sexual harassment investigations in fiscal year 2019 (see “Special Report: Sexual Harassment,” page 39), for goals and exact results).

TABLE 6. Allegations Received by Category in FY16–FY19 (# of cases)

Allegation	FY16	FY17	FY18	FY19
Harassment	49	60	79	83
Non-Compliance with Staff Rules	74	60	44	39
Sexual Harassment	10	11	35	28
Abuse of Authority	26	31	34	22
Personal Legal Obligation	17	18	20	18
Misuse of Bank Resources	19	21	18	15
Retaliation	11	11	11	10
Discrimination	8	7	7	4
G-5 Domestic	15	9	4	3
Sexual Exploitation and Abuse	0	0	0	2
Total	229	228	252	224

TABLE 7. How EBC Managed Cases in FY19

Total Number of Allegations Processed in FY19	257
Brought forward from previous year (FY18)	33
Reported in FY19	224
Total number of allegations closed in FY19	233
Closed at Intake	123
Closed during Preliminary Inquiry	74
Closed during Investigation	17
Reports to HRDVP	19
Total number of allegations carried over to FY20	24

CHART 5. EBC Action Taken on Allegations that Did Not Move to Investigation or a Report to HRDVP in FY19 (# of cases)

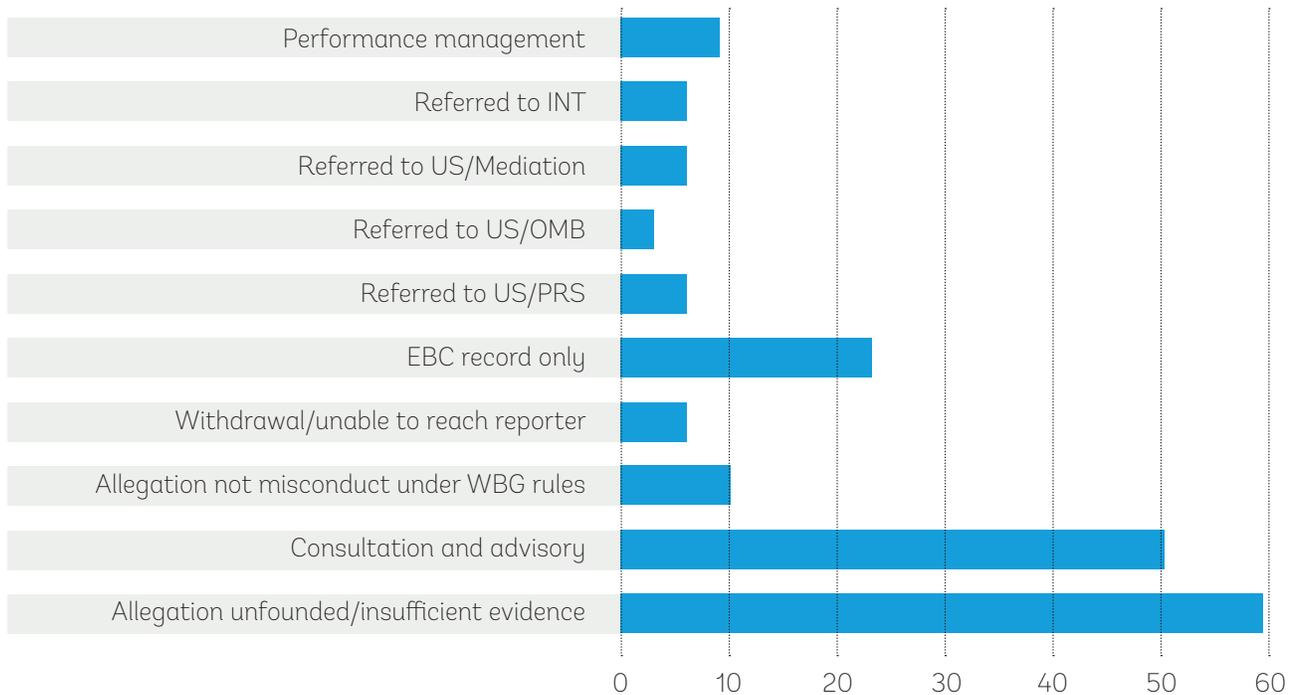


TABLE 8. Allegations Received by EBC by Region in FY19, Noting Location of Where the Accused Is Based

Location/Region	# of Cases
FY19	224
AFR	28
EAP	15
ECA	11
LCR	8
MNA	9
HQ	134
SAR	19

HRDVP Disciplinary Decisions Made in FY19*

Location	FY (case submitted to HRDVP)	Categories of Allegations	HRDVP Decision	Subject's Grade Level
CO	FY18	Non-Compliance with Staff Rules (sexual relationship between a staff member and his/her direct report); abuse of authority	Termination of WBG employment; ineligibility for any future employment with the WBG; access restriction; written censure on personnel record.	GF
CO	FY18	Misuse or abuse of Bank Group resources	Ineligibility for any future employment with the WBG; access restriction to WBG premises; full restitution to the WBG in the amount of \$3,997.49; written censure remains on personnel record.	Consultant
HQ	FY19	Harassment (hostile work environment)	Termination of WBG employment; ineligibility for any future employment with the WBG; access restriction; written censure remains on personnel record.	Consultant
CO	FY18	Sexual harassment (hostile work environment)	Ineligibility for any future employment with the WBG; written censure remains on personnel record.	Consultant
CO/HQ	FY19	Non-Compliance with Staff Rules (sexual relationship between a staff member and his/her direct report); abuse of authority	Staff member resigned. Ineligibility for any future employment with the WBG; access restriction to WBG premises; written censure remains on personnel record.	GH
CO	FY18	Non-Compliance with Staff Rules (sexual relationship between a staff member and his/her direct report); abuse of authority	Staff member resigned. Ineligibility for any future employment with the WBG; access restriction; written censure remains on personnel record.	GF
CO	FY19	Sexual harassment (hostile work environment)	Demotion to level GA; ineligibility for promotion for one year; written censure remains on personnel record for a period of three years.	GB
HQ	FY19	Harassment (hostile work environment); AMS 12.10, para 10 (sending defamatory, derogatory, obscene, or harassing emails)	Ineligibility for salary increase for the fiscal year; written censure remains on personnel record.	GG
CO	FY19	Unwelcome and inappropriate behavior; failure to observe generally applicable norms of prudent professional behavior	Reduction in future pay (withholding of FY18 pay increase); written censure remains on personnel record; undertake mandatory WBG Sexual Harassment training and WBG training course "Managing Challenges of Intercultural Complexities."	GG
CO	FY19	Harassment (hostile work environment)	Ineligibility for any future employment with the WBG.	GA

* The information reported in this table reflects decisions by HRDVP made in FY19 regardless of when EBC substantiated the allegations and sent the reports to HRDVP.

Location	FY (case submitted to HRDVP)	Categories of Allegations	HRDVP Decision	Subject's Grade Level
CO	FY19	Misuse or abuse of Bank Group resources	Termination of WBG employment; ineligibility for any future employment with the WBG; access restriction; written censure remains on personnel record.	GH
CO	FY19	Sexual harassment (hostile work environment)	Staff member resigned. Ineligibility for any future employment with the WBG; access restriction; written censure remains on personnel record.	GG
CO	FY19	Sexual harassment (hostile work environment)	Ineligibility for salary increase/promotion for five years; participation in WBG sexual harassment courses; written censure remains on personnel record.	GG
CO	FY19	Misuse or abuse of Bank Group resources	Termination of WBG employment; ineligibility for any future employment with the WBG; access restriction to WBG premises; written censure remains on personnel record.	GF
CO	FY19	Sexual exploitation and abuse; failure to observe generally applicable norms of prudent professional behavior	Ineligibility for any future employment with the WBG; access restriction to WBG premises; written censure remains on personnel record.	Consultant
CO	FY19	Willful misrepresentation of facts intended to be relied upon; failure to observe generally applicable norms of prudent professional behavior	Ineligibility for a salary increase and promotion in FY19; written censure to remain on personnel record.	GB



Participants in the June 2019 EIB and WBG Conference on Ethics and Corporate Culture

PILLAR 3: Develop Excellence

As the leader in development, the WBG has a duty to other organizations and institutions to share best practices in ethics in a values-based, people-centered work environment. EBC's external outreach enables the department to make a lasting impact beyond our own walls, as a center of excellence in ethics.

EBC's partnerships with the United Nations and other international organizations, for instance, through the Ethics Network of Multilateral Organizations (ENMO) are opportunities to share best practices. We exchange ideas, benchmark, share best practices, and develop strategies that make a difference in the global ethics and development arenas.

The European Investment Bank (EIB) and the World Bank Group jointly held the Ethics and Corporate Culture Conference 2019 in the EIB Luxembourg headquarters in June 2019. World Bank Group Managing Director and Chief Administrative Officer Shaolin Yang gave his opening remarks to a full room of about 150 international experts and participants from ethics, compliance, regulation, behavioral science, and artificial intelligence.

EBC and our international partners

exchange ideas, benchmark, share best practices, and develop strategies that make a difference in the global ethics and development arenas.



Top: WBG Chief Ethics Officer Jorge Dajani addresses civil society and faith based organizations attending a March 2019 ethics workshop on sexual harassment, sexual exploitation and abuse.

Bottom: EBC presents in Stockholm, the WBG’s Action Plan for Preventing and Addressing Sexual Harassment at the Global Partnership for Education (GPE) board meeting.

The MDCAO noted the importance of ethics in development and emphasized that International Financial Institutions (IFIs) must exert strong ethical leadership in the world:

“The challenges of development—the challenges of improving the lives of others—are not purely economic or financial. They are ethical,” Yang said. “As collectives of nation states—the European Investment Bank, the World Bank Group, and other IFIs—believe in, and work toward, the ethical necessity of global cooperation to improve lives and societies.”

EBC is engaging in an ongoing dialogue with key stakeholders, including a March **2019 workshop** with CSOs and faith-based organizations at WBG headquarters—has been instrumental for informing the WBG’s work to prevent and address sexual harassment, and for sharing best practices on addressing sexual harassment, exploitation and abuse. The workshop, hosted by the World Bank Group’s Ethics and Business Conduct department, included representatives from: the World Bank Group, the American Friends Services Committee (AFSC), BRAC, CARE USA, Catholic Relief Services, InterAction, International Committee of the Red Cross, International Rescue Committee, Islamic Relief USA, Oxfam America, United Nations Foundation, and World Vision.

In **Stockholm**, in June 2019, EBC presented the WBG sexual harassment action plan to the Board of Directors of the Global Partnership for Education (GPE). The action plan was very well received, and the CEO of the GPE restated her commitment to this initiative and to having the WBG as the main service provider on this issue.



Chief Ethics Officer Jorge Dajani conveyed key messages of the WBG's ethics strategy the Fourth International Compliance Congress in Madrid.

In May 2019, EBC participated in **Compliance Week** in Washington, DC, on a panel titled, "From Rules to Reality: How to Embed Your Ethics and Compliance Program into Your Organization's Operations." This was followed by our involvement in the Fourth International Compliance Congress in Madrid, where EBC personnel presented a keynote speech on "The Promotion of an Ethical Culture by International Institutions."

In February 2019, EBC presented a **training on harassment** and sexual harassment to participants from 18 international organizations. The training was a feature of the conference "Managing Employment Disputes Effectively in International Organizations," in Turin, Italy, for the International Training Center of the International Labour

Organisation. In Geneva, in November 2018, EBC shared best practices during a joint UN CEB Task Force on Sexual Harassment training. The module was about resolving employee disputes in international organizations.

EBC conducted a **strategic engagement** in June 2019 with a delegation from the Kenyan Ethics and Anti-Corruption Commission (EACC). The visit provided the opportunity for the EACC to interact with many WBG services (for example, the Integrity Vice Presidency, the Risk Management Vice



Kenyan Ethics and Anti-Corruption Commission (EACC) Secretary and Chief Executive Officer Twalib Mbarak (left) and WBG Chief Ethics Officer Jorge Dajani (Right) discuss areas for potential collaboration in Nairobi in March 2019.

Presidency, and the Internal Justice Services) and to meet with the ethics functions of other Washington-based IFIs (for example, the International Monetary Fund and the Inter-American Development Bank).

The **Multilateral Organisation Performance Assessment Network (MOPAN)**—a network of 18 donor governments that finance multilateral organizations—is currently developing a methodology for assessments of safeguarding against sexual exploitation and abuse (SEA) and sexual harassment in multilateral organizations (both in the workplace and under projects). The WBG (together with four UN agencies) has been selected as a case study to develop a methodological proposal to be integrated into the overall MOPAN assessment methodology for 2020 onward.



Luxembourg Minister of Finance Pierre Gramegna, WBG MDCAO Shaolin Yang, and EIB President Werner Hoyer in Luxembourg on June 6, 2019

SPECIAL REPORT

Sexual Harassment:
Toward a Culture of
Zero Tolerance, Where
Inappropriate Behavior Is
Being Systematically
Addressed



In May 2019, keynote speaker Dr. Jackson Katz tells WBG staff the #MeToo movement has provided momentum for women to exercise leadership and make significant progress on issues of sexual harassment and gender-based violence. Dr. Katz also says these issues continue to be seen by many as “women’s issues that some good men help out with,” and that mindset needs to change.

Thanks to significant input from WBG staff, reporters of misconduct, the Staff Association, the external review recommendations, the staff-led Sexual Harassment Working Group’s findings and ideas, and other valuable contributions from throughout the WBG, EBC was able to lead the development of a three-year sexual harassment prevention plan: The WBG Action Plan for Preventing and Addressing Sexual Harassment.

The action plan, published in May 2019, is the WBG’s roadmap to overcoming sexual harassment. With more than 50 initiatives, the action plan addresses key issues, such as:

- using new allegation-reporting options innovated by ITS;
- empowering and guiding managers to fulfill all their responsibilities when addressing cases;
- clarifying policies and procedures;
- increasing transparency by publishing on the WBG intranet all substantiated and sanctioned cases;
- adopting new, relevant trainings—face to face, videoconference, and e-learning;
- introducing the new role of EBC Anti-Harassment Coordinator (AHC); and
- sharing best practices with the international community.

Sexual Harassment Reviews in Fiscal Year 2019

Allegations Processed (carried over from fiscal year 2018 and reported in fiscal year 2019)

In fiscal year 2019, EBC processed 41 cases of sexual harassment and two cases of sexual abuse and exploitation, 11 of which were carried over as ongoing investigations from fiscal year 2018.

Classification of Sexual Harassment Allegations Received

Typically, the types of allegations of sexual harassment that are reported to EBC fall into two categories: quid pro quo sexual harassment and hostile work environment sexual harassment.

Quid pro quo sexual harassment occurs when submission to sexual advances or requests for sexual favors are made a condition of employment or used as the basis for employment decisions. For example, a manager gives a staff member a poor performance review because the employee will not have a sexual relationship. In fiscal year 2019, EBC did not receive any reports of quid pro quo sexual harassment.

TABLE 9. Disposition of Sexual Harassment Allegations in FY19

Brought forward from previous year (FY18)	11
Reported in FY19	30

Total number of allegations processed in FY19 **41**



EBC Chief Counsel and Head of Investigations Jodi Glasow (right) and Ethics Analyst Olesya Gafurova (left) listen to Dr. Katz at a May 2019 “Men and #MeToo” learning event in Washington, DC.

TABLE 10. Classification of Sexual Harassment Allegations in FY19

Quid pro quo	0
Hostile work environment	28
Sexual exploitation	2
Total number of allegations received in FY19	30

TABLE 11. Classification of Reporters of Sexual Harassment and Sexual Exploitation and Abuse Allegations in FY19

Reporter	#
Complainants	13
Managers	12
Witnesses	1
Anonymous parties	3
External parties	1
Total	30

13/30

In fiscal year 2019, 13 out of 30 complainants of alleged sexual harassment spoke up and reported the allegations themselves to EBC.

Sexual harassment in the realm of hostile work environment occurs when sexual conduct or other actions interfere with a staff member’s work or create an intimidating or offensive work environment.

In April 2018, the WBG revised Staff Rule 3.00 (Office of Ethics and Business Conduct), paragraph 6.01 (Allegations of Misconduct Addressed by EBC) to clarify and explicitly state that sexual exploitation and abuse is a sanctionable form of misconduct and is prohibited. Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- In fiscal year 2019, EBC received 28 allegations of sexual harassment that created a hostile work environment. Of these 28 allegations, 16 involved allegations of staff experiencing unwanted attention and inappropriate comments from colleagues, six allegations concerned physical touching, three allegations concerned complaints made against government counterparts and other clients, two allegations concerned past sexual harassment perpetuated by the staff member, one allegation involved sexual propositions made by a staff member, and one allegation concerned assault.
- Two reports were made against staff members who were alleged to have been involved in sexual abuse and/or exploitation.

Categories of Misconduct Allegation Reporters

- Thirteen complainants of alleged sexual harassment spoke up and reported the allegations themselves to EBC.
- Twelve managers reported allegations of sexual harassment they received to EBC. Managers have an obligation to report misconduct allegations they witness or receive from their staff to EBC.
- One witness of sexual harassment reported the allegation to EBC.
- Three reports of alleged sexual harassment were made by anonymous sources.
- One report of alleged sexual harassment was reported by a non-WBG staff member.

Cases Closed per Investigation Stages

EBC processed 41 cases of alleged sexual harassment and sexual exploitation and abuse in fiscal year 2019, 11 of which were ongoing reviews from the previous fiscal year, 2018. During its review of the allegations, EBC found sufficient evidence to support findings of misconduct in six cases. In these cases, EBC sent a report of its findings to the HRDVP for review and possible sanctions. As of the date of the present report, the HRDVP made decisions on four of the six cases.

Of the 41 allegations processed in fiscal year 2019, 11 were closed at intake either because there was insufficient evidence, the allegations were best addressed through an informal resolution, or because reporters wanted to inform EBC without triggering an investigation. EBC addressed some of these concerns raised by reporters by speaking to the relevant parties and management about the inappropriate behavior. Twelve cases were closed at preliminary inquiry, and five were closed at investigation, either because there was insufficient evidence to support the evidentiary threshold required for a finding of misconduct or because a further review of the behavior revealed that the conduct did not constitute sexual harassment.

Getting Faster Results for Sexual Harassment Cases

EBC developed and delivered many actions and initiatives during fiscal year 2018 to foster a respectful and safe work environment and to combat sexual harassment in all its forms at the WBG. Fast-tracking sexual harassment investigations was one of EBC’s commitments.

In fiscal year 2019, EBC substantiated six sexual harassment cases, which is substantially higher than in previous years. The average duration of sexual harassment cases was 151 days in fiscal year 2019, a significant reduction compared to last year’s average of 227 days.

The WBG still has a ways to go, but how were these results achieved? Special investigative teams were immediately put in charge of four of the six allegations, all from country offices, and involving interviews with a number of current and former staff members. Within the first week, the investigative team conducted telephone interviews with the victims (STCs and vendor employees) and other key individuals. Based on the information obtained, the investigative team determined that there was a credible basis to conduct additional investigative activity and that a remote investigation would likely not suffice to fully address the allegations in a timely way.

TABLE 12. Number of Sexual Harassment and Sexual Exploitation and Abuse allegations Received in FY19

Institution	#
IBRD	26
IFC	3
MIGA	0
ICSID	0
GEF	0
GPE	0
External parties	1

Total number of allegations received in FY19 **30**

151

In fiscal year 2019, EBC substantiated six sexual harassment cases. **The average duration of a sexual harassment investigation was 151 days.**

FY19, a significant reduction compared to last year’s average of 227 days.

TABLE 13. Sexual Harassment Allegations Closed at Each Stage of the Investigation Process in FY19

Total number of allegations processed in FY19	41
Total number of cases closed in FY19	35
Closed at Intake	11
Closed during Preliminary Inquiry	12
Closed during Investigation	5
Reports to HRDVP	7
Cases not substantiated as sexual harassment	2
Allegations carried over to FY20	4



Sexual Harassment Working Group Co-Chair Sandie Okoro asks a question during WBG President Malpass’s first all-staff townhall, on May 16, 2019. Okoro is also Senior Vice President and World Bank Group General Counsel.

Within three weeks, the teams were on the ground in the country, interviewing relevant witnesses (over 20 per case) and the subject(s) of the allegations. The development of a sound investigative strategy from the outset of the allegations ensured the successful and efficient completion of these cases. EBC worked together with victims, and management when appropriate, to ensure their wellbeing and protection against retaliation.

Additional improvement lies ahead, according to our goals, cited above. For example, we are working on improving communication to staff on investigation procedures and outcome. The impact of the fast-tracked sexual harassment cases is not only that we have been able to serve our clients more effectually. It also conveys that EBC is tackling service matters quicker and building trust in the investigation system and with our clients.

In addition, in May and June 2019, EBC staff, and in particular, investigators, took part in mental health first aid certification training to develop skills in how to address distraught people in several crisis scenarios.

EBC’s Initiatives

One of the recommendations of the external expert review was to create the EBC Anti-Harassment Coordinator (AHC) position, filled in early fiscal year 2020. The AHC is charged with providing advice and guidance to staff and managers who are

experiencing inappropriate behavior, and assisting them to address and resolve the matter.

The AHC is a one-stop shop within EBC who ensures a consistent approach for all allegations of sexual harassment and sexual exploitation and abuse, and makes it easier for EBC to support the individual. The Anti-Harassment Coordinator:

- **advises and counsels staff who come to EBC;**
- **discusses the matter with supervisors of the alleged offender and HR business partners where appropriate, provides advice on a remediation program;**
- **cautions staff and managers about inappropriate behavior; and**
- **monitors the impact of resolution and the absence of retaliation.**

Currently, when inappropriate behavior is established but falls short of misconduct, EBC does not just close the case. In fiscal year 2019, we adopted writing advisory/ lessons learned memoranda to the senior management of the staff member who behaved inappropriately, with a recommendation of how best to resolve the matter. This new practice gives the complainant the comfort of knowing that management is cognizant of and taking steps to resolve the matter through measures different than disciplinary sanctions.

Consistent approaches

While EBC has been spearheading the work on preventing and addressing sexual harassment within the WBG organization, the Gender-Based Violence (GBV) specialists of the WBG have defined standards to prevent sexual exploitation and abuse in the WBG's large infrastructure projects and are working on defining similar standards in other areas of WBG activities. EBC is sharing information with our GBV colleagues to ensure a consistency of approach between the standards applicable internally and those applicable in WBG operations.

In part as a consequence of this increased cooperation with other departments, EBC proposes to define domestic violence as a misconduct. This will complement the prohibition of participation in sexual exploitation and abuse that exists in the staff rules, and as a result, participation in all forms of sexual violence will be prohibited for all WBG staff.

EBC is increasing sexual harassment support and management with the new **Anti-Harassment Coordinator (AHC)** position.



Anne-Marie Burns became the WBG's Anti-Harassment Coordinator on October 15, 2019

Training covers the principles of forensic interviewing, with a focus on the core investigative interviewing areas of:

- Memory and cognitive principles
- Vulnerable/intimidated interviewees
- Planning and preparation
- Rapport
- Questioning and listening
- Notetaking
- Third parties at the interview
- The free recall interview model
- The conversation management model
- Interview evaluation

Investigative training

To develop investigators' sexual harassment skillset, in May 2019, EBC brought in experts to train all our investigators during an intensive two-day session in conducting sexual harassment investigations.

The Investigative Interviewing Training Program is designed to provide:

- **A developed understanding of investigative interviewing within a sexual harassment fact-finding inquiry. The focus is on developing an “investigative mindset” to seek, identify, and secure information, evidence, and intelligence at interviews with complainants, witnesses, and subjects.**
- **An understanding of the psychology and other foundational theory that applies to investigative interviews, including the concept of “procedural justice” and its significance as an ingredient of rapport.**
- **An opportunity to engage in sexual harassment-themed roleplay interview exercises tailored to build confidence and develop investigative interviewing skills in a safe and supportive learning environment.**

Expert cooperation

In October 2018, the Chief Ethics Officer led a WBG delegation and was a speaker at a DFID-sponsored international summit in London on “Putting People First: Tackling Sexual Exploitation and Abuse and Sexual Harassment in the Aid Sector.”

An EBC manager has served and will continue to serve as a member of the UN Chief Executive Board (CEB) Task Force on Preventing and Addressing Sexual Harassment. EBC is also a member of the Steering Committee for the CEB Task Force Sub-Group on Strengthening Investigatory Capacity.

The discussion “Bystander Intervention” was led by clinical psychologists for an EBC audience in November 2018. The event highlighted the potential involvement of witnesses in sexual harassment cases.

EBC hosted the first WBG-CSO Ethics Workshop on preventing and addressing sexual harassment, exploitation, and abuse in March 2019. This event included heads and senior officers of the ethics, compliance, HR, diversity, and general counsel offices from the following 11 Civil Society Organizations (CSOs): American Friends Services Committee, AFSC; Building Resources Across the Community, BRAC (Bangladesh); CARE USA; Catholic Relief Services (USA), InterAction (USA);



International Committee of the Red Cross (Switzerland); International Rescue Committee, IRC (USA); Islamic Relief USA; Oxfam America (USA); United Nations Foundation (USA); and World Vision (USA).

In late May 2019, EBC organized the “Men and #MeToo: Possibilities and Perils in a Time of Change” learning session. The event was an important opportunity to engage staff on the role men can play in reducing sexual harassment in the workplace.

In June 2019, a new sexual harassment action plan initiative published all cases in HQ and country offices that had been substantiated by EBC and sanctioned by the HRDVP for the past three years through March 2019 on the WBG intranet, and will continue to do so every quarter going forward. Each case description includes details about the case, the type of sanction, and the grade level of the subject.

Into the Future

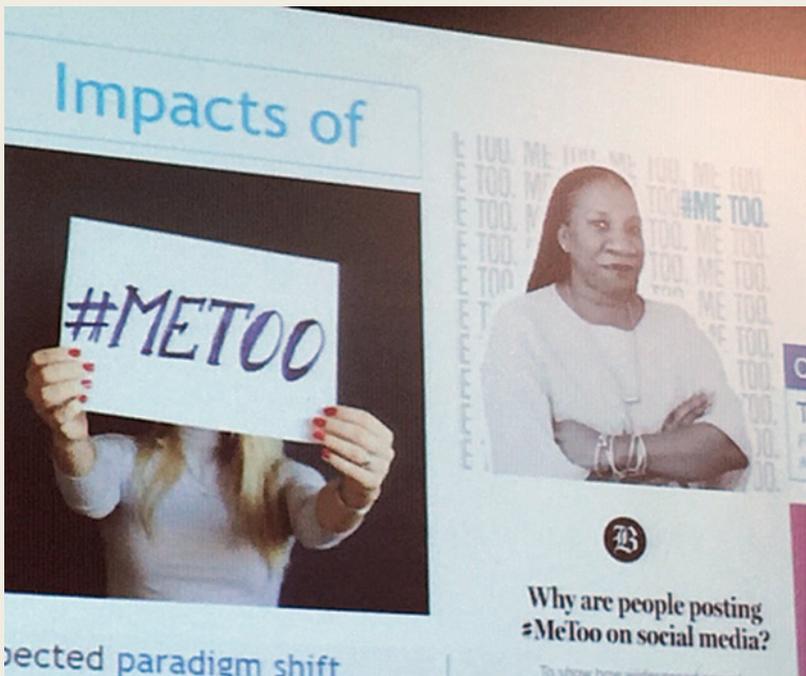
Together we have the power to create an environment in which people trust that when they report sexual harassment, their voices will be heard, their dignity will be respected, fair and due process will ensue, and perpetrators will be held accountable.

The WBG Action Plan for Preventing and Addressing Sexual Harassment will be reviewed and updated on a biannual basis, and the Working Group on Sexual Harassment will monitor and report progress.

On Friday, March 22, 2019, EBC hosted an ethics workshop with leaders of 11 Civil Society and faith-based organizations to share best practices for the aid and development community on preventing and addressing sexual harassment, and exploitation and abuse perpetrated by individuals working for the organizations themselves.



Above: Dr. Jackson Katz (left), IFC Manager Goran Zaric (with microphone), Africa Regional Director Ede Jorge Ijjasz-Vasquez (second from right), and Manager of Outreach, Training, and Values Trang Nguyen (right) discuss Dr. Katz’s point that all men—and in particular senior men who have disproportionate influence in shaping and sustaining social norms—need to step up as leaders in explicitly addressing gender violence and sexual harassment in the workplace.



Left: Slide presented by Dr. Kavita Avula and Dr. Sabrina Crawford at November 2018 EBC learning event to empower bystanders who witness sexual harassment in the workplace.



Our Core Values

📍 Impact. 📍 Integrity. 📍 Respect. 📍 Teamwork. 📍 Innovation.

The WBG'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, the values 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.

Core Values Awareness Activities

Following on many fiscal year 2018 activities to build awareness of the core values—visual displays in all WBG DC buildings; addition to the EBC internal website and the computer home screen in collaboration with ITS; values as the topic of an Ethics-at-Work Learning Series event; and leveraging IJS Day/Week with Values Day in coordination with the Ombuds office—fiscal year 2019 also saw significant action surrounding the core values. They are now displayed prominently in offices and meeting rooms across the institution, and they are highlighted on the internal homepage.

EBC distributed core values posters to all VPs. The department distributed communications templates to managers to guide values conversations with their teams in September 2018.



What We Care about Most

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 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 WBG
- We partner with our clients with flexibility and agility

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, work styles, and perspectives
- We remain humble in carrying out our mission
- We support 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 seek diverse views, perspectives and experiences

- We encourage challenging ideas and constructive disagreement
- We collaborate across boundaries and borders
- We collectively own team deliverables, decisions, and accountabilities
- We celebrate and reward team successes

integrity

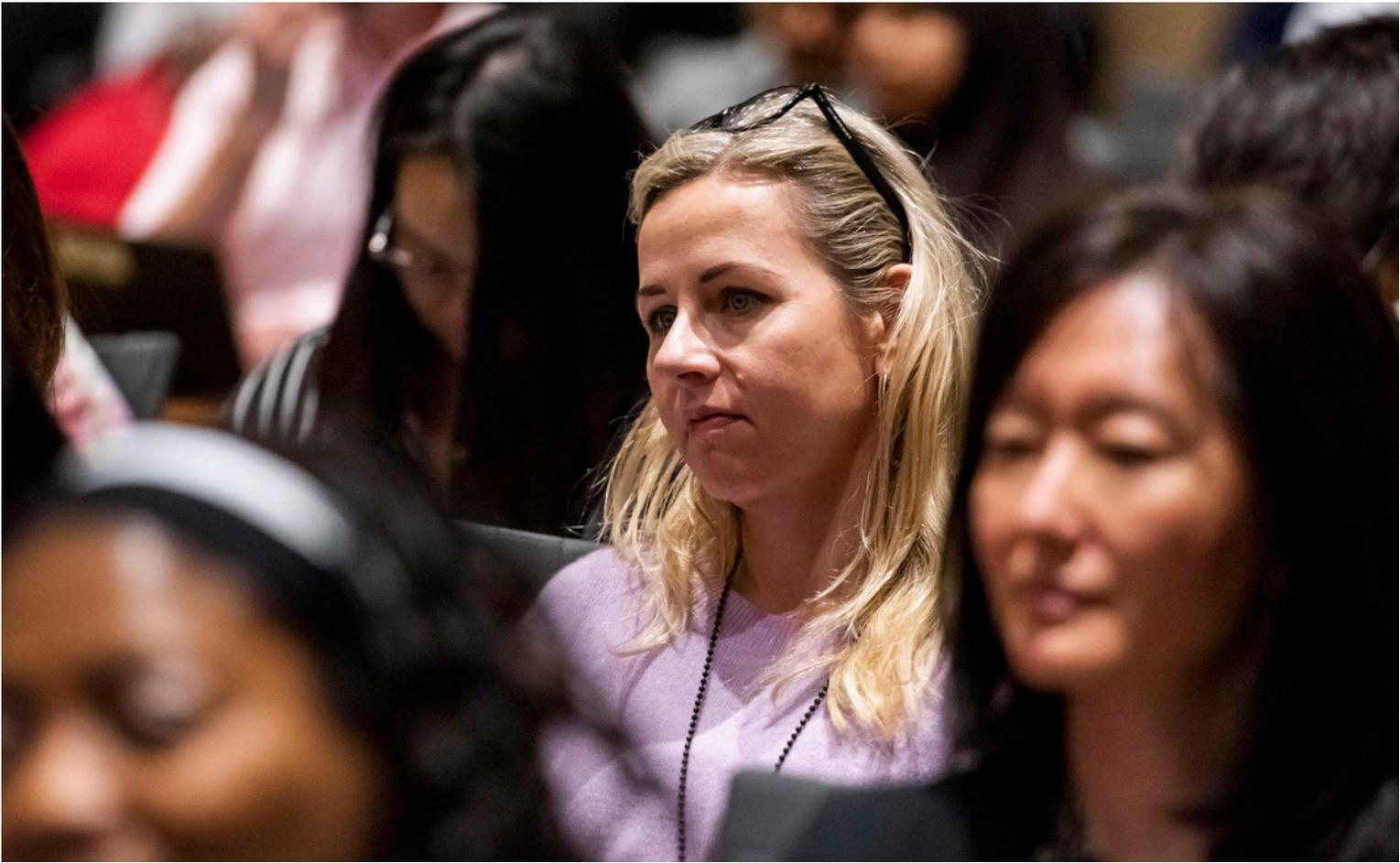
We do what is right

- We hold ourselves, our clients, and our partners to the highest ethical standards
- We put the interests of the WBG 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

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



**WBG staff attend
Ethics-at-work session
in Washington DC.**

CONTACT EBC 24/7

EBC enables staff members (both past and present) to seek ethics-related advice or report suspected misconduct and other ethical issues. The department informs employees, business partners, and other stakeholders of EBC's services through a range of communications and training programs. Most services are provided in English, which is the working language of the organization.

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 external website. 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.



EBC delivers ethical awareness training during Lebanon FCS orientation for WBG staff working in fragile and conflict states.

Ethics and Business Conduct Department

Promoting ethics and our core values to reach the World Bank Group twin goals

TEL: 202-473-0279, 1-877-576-2569 from the United States.

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>

One of my first tasks as president was to launch the World Bank Group Action Plan for Preventing and Addressing Sexual Harassment—a plan driven forward by EBC and designed to ensure a respectful and harassment-free workplace.

—David Malpass, President, The World Bank Group

Ethics and Business Conduct Annual Report 2019

Promoting ethics and our core values to reach
the World Bank Group twin goals

For general queries, or public speaking or media requests,
contact EBC's Communications Officer Stevan Jackson.

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email: Sjackson@worldbank.org



Our Core Values

📍 Impact. 🍆 Integrity. 🟡 Respect. 🟡 Teamwork. 📍 Innovation.



WORLD BANK GROUP

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MIGA
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Guarantee Agency