41ˢᵗ Board Meeting

Global Fund Ethics Office

Annual Report and Opinion 2018

GF/B41/13

15-16 May 2019, Geneva

Board Information

Purpose of the paper: The Board is requested to provide input and comment to this paper, which covers the Ethics Office's Annual Report and Opinion for 2018.

⑤ The Global Fund

Executive Summary

Context

The Global Fund's Ethics Office, under the oversight of the EGC, exists to promote, support, implement and strengthen the Global Fund's Ethics and Integrity Framework ("EIF"). In turn, the Values, Codes of Conduct and Policies that comprise the EIF underpin *how* The Global Fund works in its mission of ending the epidemics.

The Global Fund's Values and Principles are real, acted upon and continued to enable progress in 2018. Some examples of these include:

- Accountability - for efficient and effective programme implementation;
- Dignity and Respect - in funding programmes to remove human rights barriers to access and reduce inequalities;
- Collaboration and Partnership - in signing the Global Action Plan for healthy lives and well-being for all[1];
- Country Ownership - through initiatives to strengthen CCMs, and;
- Duty of care - focussing us to act in the interests of those affected by the three diseases and to end the epidemics, and underpinning our decision-making.

In support of this, the Ethics Office's core work of delivering training, providing advice, dealing with conflicts of interest, and conducting due diligence continues. Notable assignments in 2018 included supporting processes to appoint the new Executive Director, Committee Members and several senior staff, as well as support to strengthening the Private Sector Engagement Framework. The Ethics Office's focus continues to evolve to areas of increased impact, including working more closely with Operations through the CCM and due diligence initiatives. We are also addressing topics that are receiving increased attention, such as the prevention of bullying, harassment and other abuses of power.

Questions this paper addresses

A. What progress has been made with the Global Fund's Ethics Office and program during 2018?
B. What progress has the Global Fund more broadly made in ethics in 2018?
C. What impact has this progress had on our ability to deliver our mission?
D. Given the above, what is the Ethics Officer's Opinion[2] on the state of ethics and integrity across the Global Fund and the extent to which Global Fund activities have complied with ethics and integrity-related policies, codes and requirements?

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[1] The Global Action Plan was signed 16 October 2018 and is available at:
https://www.who.int/sdg/global-action-plan/Global_Action_Plan_Phase_I.pdf

[2] This Opinion is delivered in accordance with article 2.a.i of the Terms of Reference of the Ethics Officer, as set forth in Annex 1 to GF/B33/ER08 and approved by the Board pursuant to decision point GF/B33/EDP14. The Ethics and Governance Committee, in accordance with its Charter, is responsible for advising the Board on the adequacy and effective

Conclusions

A. *Ethics Office and Ethics Program progress*: The Ethics Office achieved a degree of 'steady state' in 2018, maintaining relatively consistent staffing levels and fields of activity but able to handle increased workload. We reached over 900 people with awareness raising and training activities, double that of 2017. We handled over 245 advice and conflict of interest cases, compared to 183 in 2017. Highlights included: Completion of a first cycle of ethics training specifically for the Board; Greater constituency engagement through ethics presentations at several constituency meetings; A first CCM Code of Conduct workshop, and; Completion of Secretariat Code of Conduct briefings and certification.

B. *The Global Fund's progress on ethics:* Building on foundations in place at the end of 2017, the Global Fund more broadly continued to make progress in embedding ethics and integrity considerations into decision-making processes at multiple levels. Headlines include: Board approval of the Code of Conduct for CCM members and its implementation [3]; Secretariat approval of an updated Private Sector Engagement Framework[4], and; the plan of action outlined in the Integrity Due Diligence framework and its rollout. The increased case and training volumes experienced by the Ethics Office also indicate greater engagement by all parts of the Global Fund in the ethics program.

C. *Impact:* When an organization's Ethics and Integrity Framework is operating well the main evidence is often 'silent running', i.e. advice and preventive measures that result in a low rate of publicly controversial decisions and a high rate of trusted decisions. The increased number of cases raised to the Ethics Office from all parts of the Global Fund, and the corresponding increase in mitigations and resolutions achieved gives us confidence that stakeholders are considering ethics and integrity, and seeking to take trusted decisions in the interests of our mission. One minor indicator of this is the 17 cases 'not cleared' – i.e. where a proposed course of action was not approved due to the risk of a conflict of interest developing. Whilst difficult to predict what would have happened had the proposed action gone ahead, it's reasonable to assume that it would have reduced trust in subsequent recommendations or decisions made by that person or entity.

D. *Opinion:* Given the above and using the OIG's maturity scale (see Annex 4) my opinion on the maturity of ethics and integrity across the Global Fund is that it is "initiated" and moving well towards an "embedded" state. The direction of travel is consistent with that identified in 2017. Reaching embedded will require continued deployment of ethics and integrity related initiatives approved in 2018, at Governance, Secretariat and Operations levels. Some uncertainty exists in the pace to achieve embedded state, depending on implementation progress, and potential additional actions arising from the upcoming employee engagement survey and OIG's audit of the Ethics and Integrity Framework. However, early to mid-2020 remains a reasonable target.

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implementation of the Global Fund's ethical policies and operation of related systems, based on the reports and annual opinion of the Ethics Officer.

[3] The Board approved the Code of Ethical Conduct for Members of Country Coordinating Mechanisms, as set forth in Annex 4 to GF/B39/04 – Revision 1, pursuant to decision point GF/B32/DP09 (May 2018).

[4] The Board noted the Secretariat's revision of the Framework on Private Sector Engagement pursuant to decision point GF/B40/DP04 (November 2018).

Input Sought

The Board's input is sought on the opinion and progress report, with a view to improving the focus and effectiveness of the Ethics programme going forward.

Input Received

This report has been shared with the Office of the Inspector General, Management Executive Committee and Ethics and Governance Committee before being submitted to the Board, and was discussed as an agenda item at the Ethics and Governance Committee on 25-26 March 2019.

Opinion on the Maturity of Ethics and Integrity

Introduction and Ethics Risks

Norms and standards exist to guide auditors' financial control opinions. In contrast, there is no single established 'industry standard' for forming an ethics opinion. I have therefore used the following three sources as a basis for building up my opinion:

- The levels of ethical maturity in decision making (outlined in Annex 2)
- The descriptions of each level of the OIG's maturity scale (outlined in Annex 4)
- Recognized external benchmarks, such as Dubinsky and Richter's "Global Ethics and Integrity Benchmarks", 2015. (These were also used when the Ethics and Integrity Framework was being developed.)

From a risk perspective, ethics risks arise when decision-making does not operate at an appropriate level of maturity, or practices fall short of benchmarks. Ethics risks and mitigations now reside 'inside' Governance and Secretariat risks in the Organisational Risk Register (ORR), rightly positioning ethics as an enabler to other key processes and decisions, rather than an end in itself. The 'In country conduct' risk on the ORR was introduced in Q3 2018 as a means of bringing together our approach to assessment and mitigation of ethics risks arising within CCMs and implementers. This will be an increasing area of focus in 2019 and beyond. The projects described in the detailed update in this report are essentially the planned upcoming risk mitigations in the ORR. In all three areas, the residual risk is rated 'moderate' and on a steady direction of travel.

Opinion

My opinion on the maturity of ethics at the Global Fund is that good progress has been made during 2018 but it remains at 'initiated' across Governance, Secretariat and Operations. This is consistent with my 2017 Opinion. In all three areas the foundations remained sound, and all areas made incremental progress compared to 2017. A full detailed progress update is contained in Annex 3, but the main highlights that inform the opinion are as follows:

Governance level

The Board engaged in its first specific ethics training session, and there has been increased interest in the application of ethics in decision-making. Conflict of interest disclosure and management has become routine in the Board, Committees, TRP and TERG. Many Governance Officials are being thoughtful and proactively making transparency and disclosure the 'default' option rather than waiting for a disclosure request to be issued to them. We are now moving our focus to enabling this to be more differentiated and efficient. The integration of due diligence information into the decision to appoint new committee members proved challenging and resulted in an initiative to review both the wider process and the role of due diligence within it. The Board also agreed and initiated a revised Board Leadership selection process. Looking ahead, the work on governance culture within the ongoing governance action plan, and the implementation of new committee membership selection processes could provide the potential to move further towards an embedded state.

Secretariat level

As the detailed ethics progress report shows, there has been good engagement in the ethics program in the Secretariat. The organization-wide code of conduct briefings and certification resulted in the expected increase in all forms of ethics cases. Integrity due diligence information is more prominent in the new Private Sector Engagement framework. In Sourcing, integrity due diligence was an integral component of the recent Procurement Services Agent tender. We also conducted enhanced disclosures during the hiring of new senior management, protecting both theirs and the organization's reputation by checking for and, where necessary, mitigating potential conflicts of interest.

Country Operations level

My assessment remains that operations in aggregate are at the initiated level of maturity. That said, codes of conduct and robust enforcement mechanisms are in place for implementers and there continues to be ad hoc training, due diligence and engagement. Many implementers, especially the INGOs and UN bodies, already have their own established ethics and compliance programs. There is extensive focus on risk management and assurance in our grants, with oversight by GMD, Risk and the OIG. The CCM Code of Conduct initiative was approved in 2018, and now provides a 'vehicle' to strengthen ethical conduct, conflict of interest management and grant oversight at the CCM level and by extension in the implementer base.

Achieving Embedded Maturity

In my 2017 Opinion I expressed the view that the Global Fund could achieve an "Embedded" level of maturity by the end of 2019. I now think this will more likely be mid-2020, as it is dependent on achieving progress and overcoming some potential uncertainties described below. That is not to undermine the good progress that is being achieved across the Global Fund's ethics landscape. I also note that the planned self-assessment of the Ethics and Integrity Framework has been replaced by the OIG audit currently underway. This will provide further independent information and data, and I look forward to engaging with the audit and addressing any actions that result. The audit also provides an appropriate moment to re-visit the Ethics Office's vision and mission statement.

Governance
It will be important to get Board agreement on the new committee selection processes currently under development and then implement them, and to address actions arising from the ongoing Board culture initiative. Successful appointment of a Board Chair and Vice Chair will also be an indication of the effectiveness both of our due diligence and decision-making processes, and an indication of the trust placed by the Board in its designated committee (the Board Leadership Nominations Committee).

Secretariat
The Secretariat has actions underway to strengthen its investigation and disciplinary processes. Also, key data to inform the level of ethical maturity, especially in speaking up, will come from the upcoming staff engagement survey planned for April 2019.

Operations
Three initiatives are the current primary focus of the implementation of the Policy to Combat Fraud and Corruption (PCFC): The CCM Code and IDD rollouts will provide a good means to assess the maturity and level of ethical decision-making in CCMs and by extension in our implementer base. The planned updates to ethics policies and codes, which also includes incorporating our requirements to prevent bullying and harassment, will further improve maturity. Continuous improvement work is also underway to seek greater efficiency and effectiveness from our anti-corruption controls framework.

Nick Jackson
April 2019

Annex 1 – Ethics Office Mission, Vision and Contact Information

The Ethics Office is committed to the principles of

accessibility, impartiality and confidentiality

Queries may be sent to the **confidential mailbox**: globalfundethics@theglobalfund.org

Visit us in our **offices at the Global Health Campus 4th Floor**

Nick Jackson
Ethics Officer
nick.jackson@theglobalfund.org
Phone: +41-58-79 11 686

Aneta Wierzynska
Senior Specialist, Anti-corruption and Impact
Aneta.wierzynska@theglobalfund.org
Phone: +41-58-79 11 896

Petra F. de Leon
Specialist, Ethics and Integrity
petra.forsstromdeleon@theglobalfund.org
Phone: +41-58-79 11 409

Global Fund Ethics Vision

The Ethics Office operates under the authority of both the Ethics and Governance Committee and the Executive Director. The Ethics Office strives to **embed an ethical and integrity driven culture** where Global Fund Officials and all those involved in activities financed by the Global Fund apply and implement the core ethical values of the Global Fund: **integrity, duty of care, accountability, dignity and respect** and where **ethical decision making** is lived daily.

Our vision is a Global Fund where *how* we deliver our work enhances *what* we deliver, and where a strong ethics and integrity program inspires stakeholder trust and an integrated compliance and anti-corruption program safeguards resources dedicated to health.

> "A Global Fund where our culture and governance accelerate achievement of our Mission"
>
> *Ethics Vision Statement*

Ethics Office Mission

The Ethics Office is committed to the principles of accessibility, impartiality and confidentiality. We promote ethics and integrity-related values, systems and practices, and facilitate the prevention, detection and response to unethical practices at all levels of the Global Fund, through:

- Advice, guidance and support
- Training, outreach and advocacy
- Standard setting and policy support
- Monitoring compliance with ethics policies
- Facilitating the response to ethical misconduct
- Conflict of interest management

> "Promoting excellence throughout the Global Fund by addressing ethical behaviour and values, leadership and organizational culture."
>
> *Ethics Mission Statement*

Annex 2 – Levels of ethical decision making

In my 2017 opinion I described ethics as "the process of working out the right thing to do, and then implementing." Ethics is therefore about the impact of the choices we make and our behaviours as individuals and as an organisation. Ethical maturity can be assessed by whether the environment for decision-making and the resulting individual and organisational decisions are the best choices to bring us closer to sustainably ending the epidemics. I referenced four levels of ethical decision-making, each of which may be valid in different circumstances. An ethically mature organisation knows how to act at the right level for the situation at hand:

1. *Ego* ("If it's good for me, it's good"). This type of decision-making may be valid when a person is struggling to survive, but can be damaging when decisions are taken in the interests of a single, powerful, personal or small-group interest. Our multi-stakeholder decision-making structures, independent review bodies, individual codes of conduct and conflict of interest procedures collectively provide sound mitigation. However, we must remain vigilant as conflicts of interest and abuses of power of all types are some of the most damaging issues for an organization to overcome.

2. *Rules* ("It's good if it complies with the rules / laws / policies"). Clear and fair rules are essential for efficient operating as they enable streamlined, delegated decision-making. However, they can never cover all situations and dilemmas, especially when the decision is a choice between two 'good' options.

3. *Care* ("It's good if it's good for my 'group'"). Strong teams or groups can often achieve good results with this type of focus. However, it can be counterproductive if outside factors are not considered. A theoretical example might be a CCM focusing on securing and overseeing Global Fund grants, without considering other funders, or indeed programmatic or funding gaps, in the country where they operate.

4. *Wisdom* ("It's good if, all things considered, it's the best decision to move us towards our vision"). Operating at this level is complex, taking time, skill and effort from multiple stakeholders. Not every decision needs this level of analysis. The skill is in recognizing when it is needed, and applying a framework that starts with sound data, incorporates values such as justice and equity, and considers the consequential impact of a decision on multiple stakeholders. The Global Fund often operates in this way, for example in taking strategic decisions such as allocation. Another example is the increasing collaboration arising from the recognition that ending the epidemics will not happen in isolation, but only in parallel with strengthened health systems, increased fiscal space for health and broad achievement of the SDGs.

As one input to forming an opinion, I consider the extent to which, across Governance, Secretariat and Operations we are capable of recognising and making decisions appropriately in the ways described above.

Annex 3 – Detailed Statistics and Progress Update

3.1 Communications, training and awareness raising activities

The Ethics Office has been undertaking regular awareness raising and training activities and has developed a long-term strategy including activities for the Secretariat, Governance Officials (Board, TRP, TERG), grant implementers, LFAs and CCMs. Lessons learned from these sessions will be incorporated into future training and awareness materials and programs.
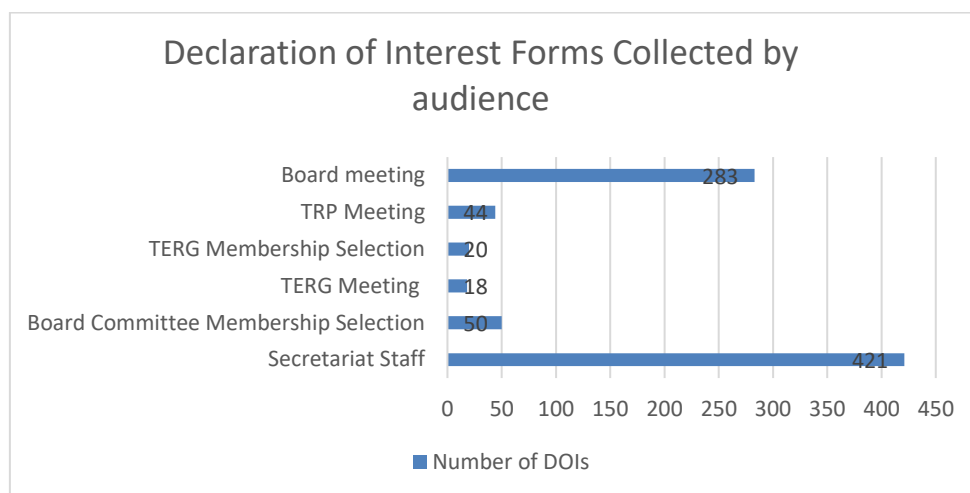
Governance: Ethics is now incorporated into all Board member on-boarding sessions. In 2018, 22 Board members, committee members, and/or constituency members have been briefed on ethics through onboarding sessions. The Ethics Officer also ran two interactive ethics sessions at the Board meeting in November 2018, one for Board members and alternates and another open for all Board meeting participants. The two sessions attracted over 100 participants in total. The Ethics Officer also ran ethics sessions for the Africa Constituency Bureau, an Implementers Group retreat and a South East Asia Constituency meeting. The three sessions reached an estimated 100 participants. Although all these trainings were provided in a Board related context, many did reach our implementers: CCM members, PRs and SRs who are members of these Board Constituencies.

Secretariat: In 2018 staff training focused on Code of Conduct and values. A total of 652 staff (including some long-term consultants) attended the interactive Code of Conduct sessions organized between February and May 2018. As part of this activity, all staff members re-certified that they had read, understood and would comply with the Code of Conduct. In addition, 70 new staff members attended the Values and Code of Conduct sessions at the Staff onboarding trainings throughout the year.

Operations: We ran a session on conflict of interest management for 16 suppliers potentially bidding for Procurement Services Agent (PSA) services (seven of these suppliers ultimately submitted bids). In the context of CCMs, we provided ethics training to the Nigeria CCM and trained CCM Evolution consultants on the CCM Code of Conduct to enable their work.

3.2 Assignments

In 2018, the Ethics Office collected declarations of interest from a total of 836 individuals: 283 for Board meetings, 44 For TRP Meetings, 20 for TERG membership selection, 18 for TERG meetings, 50 for the Board Committee Membership Selection, and 421 from Secretariat staff grade D and above. Of the 836 declarations collected, 124 contained disclosures (42 for Board meeting participants; 7 for TRP; 15 for TERG; 24 for Board committee membership selection; and 36 for Secretariat Staff). All disclosures were reviewed and assessed for actual, potential or perceived conflicts of interest. These have been included in the case statistics reported in section 3.3 below.

Declaration of Interest Forms Collected by audience

Audience	Number of DOIs
Board meeting	283
TRP Meeting	44
TERG Membership Selection	20
TERG Meeting	18
Board Committee Membership Selection	50
Secretariat Staff	421

The Ethics Office also undertook IDD assignments during the Board committee nomination process for 54 shortlisted candidates. This included screening the candidates' names and affiliated organisations against PR lists, the OIG database, international watch lists and adverse media databases. During the TERG recruitment, 16 candidates were included in the IDD exercise with the final 9 top choices being subject to detailed CV checks to determine links to previous organisations, independence and possible TRP activities. For the tender for Procurement Services Agents, the Ethics Office reviewed integrity information for 7 principal entities making bids, and an additional 4 associated entities. In addition, information relating to 90 key individuals was also collected, reviewed and analysed. This involved conducting a background check within the Dow Jones Risk Center (Factiva) to discover placement on debarment lists, other registers of illicit activity and wrongdoing, and negative or adverse media.

3.3 Cases and advice to Governance Officials and Secretariat

Between January and December 2018, the Ethics Office handled a total of 245 cases (including the 124 matters declared through Declarations of Interest as reported in section 2.2 above). These numbers contain a broad spectrum ranging from allegations of misconduct where the Ethics Office referred to HR, to inappropriate behaviours and much simpler situations such as responding to an individual conflict of interest or disclosing the receipt of a gift. The Ethics Office coordinates closely with both HR and OIG. While alleged staff misconduct is referred to Human Resources, any cases related to prohibited practices, misconduct and human rights violations in grants are referred to the OIG. In 2018 we also received a small number of cases referred from the OIG, mainly relating to alleged conflicts of interest in the implementer base. The Ethics Office monitors progress on referred cases and may be asked to provide protection from retaliation where concerns are raised in good faith. Cases are handled in accordance with the Ethics and Integrity Case Management Standard Operating Procedures finalized in August 2018. During 2018, the Ethics Office also worked closely with IT to develop an automated Case Management System that launched in January 2019.
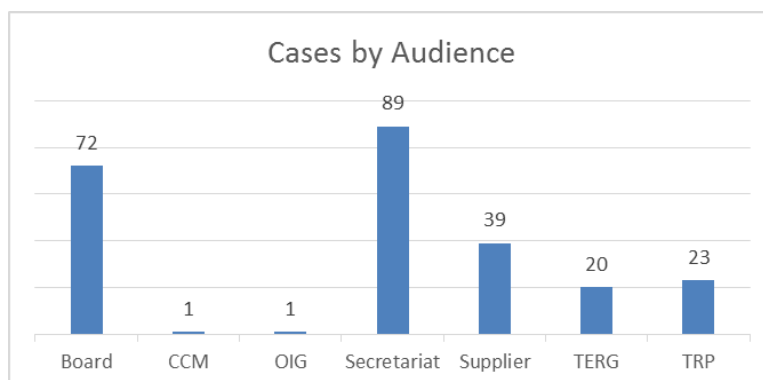
Cases are classified as follows:

- *Conflicts of interest*: covering advice, assessment and mitigation of institutional and individual conflicts of interest, including staff external appointments/engagements, gifts, hospitality, awards and decorations;
- *Conduct*: covering all matters in relation to concerns about conduct including management style, lack of respect for colleagues, potential misconduct, etc. across the codes of conduct for governance officials, employees, suppliers and recipients;
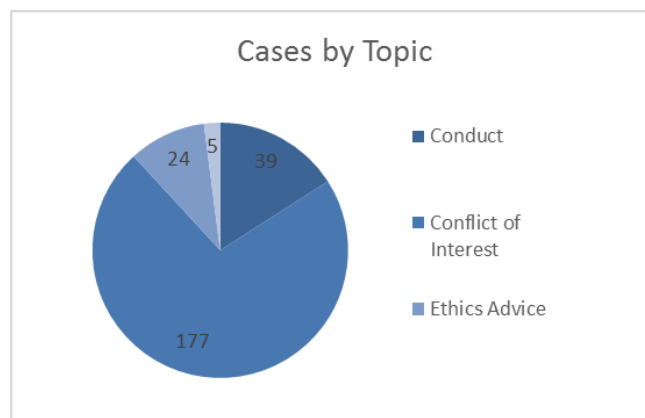
- *Ethics advice*: advice on ethical dilemmas and matters such as procurement, partnerships and research, and;
- *Policy, procedure and contract advice*, where it has an impact on our remit.

Cases by audience

The table below shows the breakdown of cases by audience i.e. those affected by the case: Board, Secretariat, OIG, TRP, TERG, Suppliers (including LFAs) and CCM. The CCM Evolution initiative gives the opportunity to increase our focus on operations in 2019 and beyond.

Cases by Topic

The table above shows the breakdown of cases by type. Conflict of interest continues being the largest category with 177 cases in 2018. This includes institutional conflicts of interest, individual conflicts of interest, external appointments/engagements, as well as gifts, awards and decorations. A breakdown of the conflict of interest cases by audience is shown in the table below:
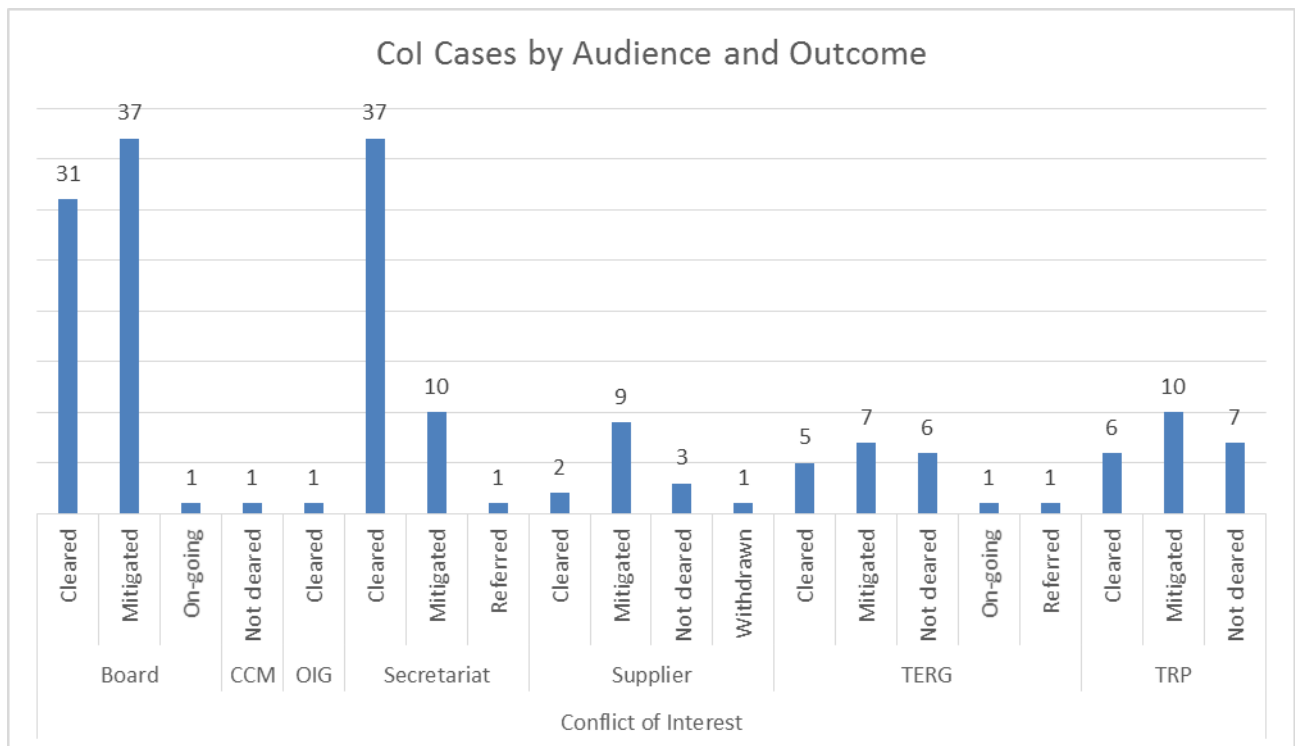
Conflict of Interest	177
Board	69
CCM	1
OIG	1
Secretariat	48
Supplier	15

TERG	20
TRP	23
Grand Total	**177**

It is important to note that while the Ethics Office directly handles conflict of interest cases from most departments and governance bodies, in the case of the TRP, LFA Coordination Team and the Private Sector Engagement Risk Committee, robust procedures exist, and the Ethics Office handles cases escalated from these bodies while remaining available for advice.

Conflict of Interest Case Outcomes

Of a total of 177 conflict of interest cases, 82 were cleared (review found no conflict of interest and activity could go ahead), 73 cases were cleared with mitigating measures (measures were put in place to mitigate the potential or perceived conflict and the activity went ahead), 17 were not cleared (conflict of interest that could not be mitigated, therefore leading to an individual or an institution e.g. staff member or supplier, not being considered or able to take up an assignment or position, or having to step down from that position or assignment). Two cases from 2018 are still on-going (as per 28 February 2019), while another three cases have been either referred to appropriate entity or withdrawn. The table below shows the outcome of conflict of interest cases by audience for further details.

CoI Cases by Audience and Outcome

3.4 Projects

1. **CCM Code of Conduct and enforcement:** The Code of Ethical Conduct for Members of Global Fund Country Coordinating Mechanisms was approved by the Board in May 2018, along with Strategic Initiative budget for roll-out. After some delays, a project manager was appointed, and the project is currently being mobilized. Early successful engagements took place with the Nigeria CCM, and there remains close alignment with the CCM Evolution work.

2. **Integrity Due Diligence Project:** In August 2018 the MEC approved the plan of action outlined in the IDD Framework, and we began to implement the standardized risk-based approach to conducting IDD in support of teams and departments that engage with third parties. The assignments identified above are a result of this. We continue to roll out to new teams, assisting process owners to incorporate integrity information into their decision-making structures and processes, alongside more familiar financial and technical data. In 2018 we also laid the foundations for efficient and effective implementation – in January 2019 we implemented a database which enables secure and compliant access and management of third party information gathered from across the Global Fund third party 'universe'.

3. **Anti-Corruption Framework:** The main initiatives to strengthen the anti-corruption framework have been the IDD and CCM projects outlined above. Nevertheless, we have responded to teams' requests to conduct risk assessments and implement more effective and efficient control frameworks.

4. **Secretariat Culture:** In 2018 the Ethics Office carried out a Code of Conduct re-certification for all Global Fund employees, including training to raise awareness and to ensure understanding of expectations by all staff. This started in February 2018 and concluded in May 2018. The overall work on Organizational Culture is led by HR, and Ethics continues to support on the topic of speaking up. The planned employee engagement survey was postponed from 2018 to early 2019 and will provide useful data on the rate of progress on this topic.

5. **Monitoring and Oversight:** We have established an Ethics case management process and, following the recommendations form the COSO review undertaken in 2017 in collaboration with the Risk Department, the Ethics Office finalized the Ethics and Integrity Case Management Standard Operating Procedures (SOPs) in August 2018. The SOPs include protocols on when to engage the Executive Director, EGC, OIG and Board Leadership for various types of cases. In 2018 the Ethics Office developed a secure online case management system which was launched in January 2019. We have also started to align more effectively with the Human Resources Department and OIG in avoiding 'gaps and overlaps' in the cases that we handle, and a more consistent approach to the case management process is in place.

6. **Policies, Procedures, & Codes:** We have now initiated the work to align codes, policies, procedures and enforcement mechanisms to the Policy to Combat Fraud and Corruption[5], and to incorporate our standards relating to the prevention of bullying, harassment and abuses of power.

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[5] The Board approved the Policy to Combat Fraud and Corruption, as set forth in Annex 4 to GF/B38/06 – Revision 2, pursuant to decision point GF/B39/DP09 (November 2017).

Annex 4 – Organisational Maturity Scale

Rating	Definition
Optimized	Internal controls, governance and risk management processes are optimized to ensure that the organization's operational and strategic objectives are met.
Actively managed and formalized	Internal controls, governance and risk management processes are actively managed and overseen with clear lines of accountability. Decision making is based on reliable data sets with sufficient due diligence, leading to assurance mechanisms that are robust and fit for purpose to enable the organization's operational and strategic objectives to be met.
Embedded	Internal controls, governance and risk management processes have been defined and are embedded in everyday management practice. However, there is insufficient close supervision or active management of these processes and/or they are not consistently measurable. It is likely but uncertain that they will allow the organization's operational and strategic objectives will be fully met.
Initiated	Internal controls, governance and risk management processes have been defined through institutional policies approved by executive management and/or the Board. However, they are not applied consistently and are not fully embedded in everyday management practice. They are unlikely to ensure that the organization's operational and strategic objectives will be fully met.
Ad hoc	Internal controls, governance and risk management processes are inchoate or ad hoc. They have not been fully defined and/or not approved by executive management or the Board. Processes are insufficient to ensure that the organization's operational or strategic objectives will be met.
Nonexistent	Internal controls, governance and risk management processes are absent.