

**Report of the Ethics Officer on the
Implementation of the Policy on Ethics and Conflict of Interest**

I. Introduction

1. The Policy on Ethics and Conflict of Interest (“the Policy on Ethics”) was adopted by the Assembly at its second session through decision A/2/DC/7 and was subsequently promulgated by the Director-General through directive ST/Directive/2012/4.
2. In 2012, the Director-General promulgated a directive on Disclosure of Interest Forms (ST/Directive/2012/11) to implement Staff Regulation 2.7 (b) and the Policy on Ethics.
3. In 2022, the Director-General promulgated the revised Staff Regulations and Staff Rules (ST/Directive/2022/1). The Code of Conduct is contained as an Annex to the Staff Rules.
4. The Director-General and the Assembly have designated an Ethics Officer role to be a Secretariat staff member appointed by the Director-General to implement the provisions governing ethics and conflicts of interest set out in the Staff Regulations and Rules, the Policy on Conflicts of Interest and the Code of Conduct.
5. The Ethics Officer is responsible for:
 - Providing confidential advice on ethics and standards of conduct, including conflicts of interest, to the Agency and all Covered Individuals, as that term is defined in the Policy on Ethics and the Code of Conduct;¹
 - Administering the annual Disclosure of Interest Form programme pursuant to the Directive on Disclosure of Interest Forms;²
 - Protecting Covered Individuals from acts or threats of acts of retaliation as a result of reporting possible cases of misconduct and/or cooperating with a duly authorized audit and/or investigation;³
 - Developing and delivering education and outreach; and
 - Advising on and implementing ethics standards, policies, and procedures to achieve an effective ethics programme in the Agency.
6. In 2023, the functions of the Ethics Officer were discharged by Ms. Jelena Barnes, the then Chief of Budget. In January 2024, when the Chief of Budget was appointed the Director, Administration and Management Services, the Director-General, for the purpose of ensuring continuity of the functions of the Ethics Officer, appointed the then Senior Ethics Consultant to the role of Consultant - Ethics Advisor to fulfil the duties and obligations of the Ethics Officer, reporting directly to the Director-General and administratively to the former Ethics Officer.
7. This report provides an overview of these activities from 16 September 2023 to 15 September 2024, hereinafter referred to as the “reporting period.”

¹ As per paragraphs 37-51 of the Code of Conduct, ST/Directive/2017/1, 1 March 2017.

² As per section 4 Transparency and Disclosure Requirements of the Policy on Ethics, ST/Directive/2012/4.

³ As per paragraphs 59-62 of the Code of Conduct, ST/Directive/2017/1, 1 March 2017, the Ethics Officer is responsible for receiving reports from Covered Individuals who believe in good faith that they have been the object of retaliatory action(s) or threat(s) of retaliatory action(s).

II. Ethics Activities

A. Advice and Guidance

8. During the reporting period, the Ethics Officer or the Ethics Advisor, as the case may be, provided advice and guidance on 43 matters of ethics and conflicts of interest. There were 29 matters from staff; 18 were related to outside activities. Three of these were not actually outside activities, but participation as staff members of IRENA and, therefore, referred to management and the Legal Office. An additional 14 ethics and conflicts of interest queries were received and recorded as advice to management. Like past reporting periods, there were some queries which are or should be considered and, ultimately, addressed outside the scope of the functions of the Ethics Officer.
9. Additional queries on the mandatory on-line ethics training and completing Disclosure of Interest Forms were received and addressed. These queries were not recorded as matters of advice and guidance nor separately otherwise.
10. Observation: Covered Individuals and management seem comfortable approaching the Ethics Advisor directly.

B. Annual Disclosure of Interest Form programme

11. The aim of the Annual Disclosure of Interest Form programme is to prevent or manage conflicts of interest in order to maintain public trust in the integrity of the Agency. It also serves to protect staff from engaging in conflicts of interest, which could have a detrimental impact on their work and position with the Agency.
12. The instructions and frequently asked questions, which had been substantively revised in 2023 in conformance with the Directive on the Disclosure of Interest Forms,⁴ were each reviewed and updated to support the 2024 Disclosure of Interest Form programme.
13. A total of 41 Covered Individuals met the criteria for participating in the annual Disclosure of Interest Form programme; one Covered Individual separated resulting in 40 Covered Individuals required to file the Disclosure of Interest Forms. All Disclosure of Interest Forms were completed and submitted: 62.5% of Covered Individuals required to file Disclosure of Interest Forms complied within the assigned deadline. In 2023, 44% of Covered Individuals filed the Disclosure of Interest Forms within the assigned deadline. An additional eight Covered Individuals filed within the extended deadline, making the completion rate 82.5% within the extended deadline. After multiple additional reminders, 100% compliance was achieved.
14. Disclosure of Interest Forms were accepted on-line through a dedicated email. As during the 2023 annual Disclosure of Interest programme all the Disclosure of Interest Forms were submitted electronically, administration in 2024 was the first year when Disclosure of Interest Forms were accepted only electronically, consistent with the administration of the disclosure programme by the United Nations. No concerns were raised, nor challenges reported, in completing and submitting the Disclosure of Interest Forms electronically.
15. Eleven of the filed Disclosure of Interest Forms (27.5%) warranted additional information, clarification or other interaction. Some Disclosure of Interest Forms warranted the review of information related to multiple questions. Three (7.5%) provided disclosures that warranted more substantive review by the Ethics Advisor. Ultimately, the review of the filed Disclosures of Interest Forms did not reveal conflicts of interest with the Agency.

⁴Directive, Disclosure of Interest Forms, ST/Directive/2012/11.

16. The Ethics Advisor developed a tailored version of the invitation, instructions, and frequently asked questions appropriate for new hires and distributed to new hires at the P5 level and above, in accordance with the Directive on the Disclosure of Interest Forms.
17. All submissions are retained by the Ethics Officer on behalf of the Agency securely and may be made available for inspection as required under the Directive on Disclosure of Interest Forms (ST/Directive/2012/11).
18. Observation: Pursuant to section 2 (2.1) of the Directive, Disclosure of Interest Forms, Covered Individuals are obligated to immediately submit a Disclosure of Interest Form “when there is a material change in the information previously submitted.” To date, the Ethics Officer or Ethics Advisor, as the case may be, has received one Disclosure of Interest Form outside the cycle of the Disclosure of Interest Forms programme initiated by that staff member because of a material change in circumstances. Additionally, although the Disclosure of Interest Forms and accompanying documentation were substantially revised in 2023 to eliminate the disclosure of unrelated assets, some such disclosures were still made.

C. Training and Outreach

19. Education is essential in building a culture of ethics within any organisation. The training course on “Ethics and integrity at IRENA” is mandatory for all IRENA staff members, associate professionals, and service contractors, and continues to be a key source in promoting ethical awareness and expectations of staff conduct. The course provides staff with an understanding of their rights and obligations and how to apply ethical standards at the workplace, how to identify and manage potential ethical challenges, and make decisions in an ethical manner. The training is available online for all staff, and course materials remain accessible after the certification. Providing online training is a deliberate training format choice as it enables staff to take the course at any time around their work schedule, to be trained, and to reflect on ethical standards.
20. All newly appointed staff members, associate professionals, and service contractors are informed by Human Resources of the requirement to complete and successfully pass the online training course, as part of their induction programme. Even though this online training course is continuously assigned and, therefore, at any given time, 100% compliance is not possible, IRENA achieved 100% compliance of active staff slated to have completed the online training course by the summer and, as of the date of this report, the percentage rate for all active staff assigned the on-line ethics training is more than 99%.
21. The existing Ethics intranet site was revamped into an Ethics Hub. The Ethics Hub was initially populated at the end of calendar year 2023 and has continued to be maintained with the addition of information on gifts and the implementation of an on-line gifts disclosure form, alerts on the initiation and progress of the Disclosure of Interests programme, and news highlights including IRENA’s first year participating by invitation in the annual Ethics Network of Multi-lateral Organisations (ENMO) conference.
22. A concise and pleasing year end newsletter was prepared, communicated on, and posted on the Ethics Hub. A year-end newsletter is slated to be prepared, communicated on, and posted on the Ethics Hub again in 2024.
23. Observation: Having dedicated professional resources supporting the functions of the Ethics Officer has enabled the development of ethics materials, like the newsletter and the Ethics Hub. It has also enabled the Ethics Hub to be maintained and enhanced with additional resources for staff and management.

D. Protection from Retaliation

24. The Ethics Officer is responsible for reviewing claims of retaliation as related to actions or threats of actions as a result of a Covered Individual making a report in good faith to the officials authorized by the Agency to address actual and possible cases of violations or breaches of the Staff Regulations and Rules including the Code of Conduct, the Financial Regulations and Procedures, and the Policy on Ethics as well as any other directives on misconduct promulgated by the Director-General and/or for cooperating with a duly authorized investigation and/or audit. The Ethics Officer is not responsible for other forms of retaliation which would be considered misconduct otherwise.
25. During the reporting period, there was one request for protection against retaliation for reporting misconduct and/or cooperating with a duly authorized investigation or audit. The request was reviewed and determined to be outside the scope of retaliation protection as the alleged retaliation was not a consequence of reporting misconduct and/or cooperating with a duly authorized investigation and/or audit.
26. The Ethics Advisor prepared a form for Covered Individuals to submit claims of retaliation related to actions or threats of actions as a result of Covered Individuals making a report of misconduct in good faith and/or cooperating with a duly authorized investigation and/or audit.
27. Observation: As claims of whistleblower retaliation are, by and large, a consequence of reports of misconduct, the implementation of a separate policy on misconduct is useful to administering a protection from retaliation policy.

E. Policies and Procedures

28. As requested by the Council at its twenty-seventh meeting, the Secretariat prepared, in consultation with the Ethics Advisory Board, the following draft policies for consideration by the Council:
 - A draft Policy on the process for addressing allegations of misconduct against the Director-General of IRENA, and on investigations and the disciplinary process for such conduct;
 - A draft Policy addressing prohibited conduct, including fraud, corruption and other financial misconduct, and discrimination, harassment, including sexual harassment, and abuse of authority;
 - A draft Policy on protection against retaliation for reporting misconduct or cooperating with duly authorised audits and investigations; and
 - A draft revision on the Policy on Ethics and Conflicts of Interest for the International Renewable Energy Agency.
29. During the reporting period, the Secretariat also worked on the preparation of a draft revised Code of Conduct, but postponed finalisation of the draft until after the twenty-eighth meeting of the Council. The Secretariat intends to prepare, in consultation with the Ethics Advisory Board, a revised version of the Code of Conduct taking into account the deliberations and decisions of the Council on the above-mentioned draft policies, in particular the Policy on Ethics and Conflict of Interest.
30. Observation: Once the Policy on Ethics and Conflict of Interest is revised, the Directive on the Disclosure of Interest Forms can be revised, and once the Protection from Retaliation Policy is promulgated, the draft form for reporting whistleblower retaliation can be finalized.

F. Ethics Advisory Board

31. Germany, the United Arab Emirates and the United States of America continued to serve as members of the Ethics Advisory Board.
32. During the reporting period, the Ethics Officer met with the Ethics Advisory Board. Subsequently, the Ethics Advisor met informally with each member of the Ethics Advisory Board and formally with the Chair of the Ethics Advisory Board and management. The Ethics Advisory Board additionally met separately with management on issues of ethics and conflicts of interest.
33. Observation: Having regular informal consultations with the Ethics Advisory Board would be useful to ensuring there is a good understanding as related to the functions of the Ethics Officer.

G. Ethics Network of Multi-lateral Organisations (ENMO)

34. During the reporting period, IRENA applied for and was accepted into ENMO and attended its first annual ENMO conference with sessions on various topics relevant to ethics including but not limited to whistleblower retaliation protection, conflicts of interest/outside activities, and common standards of practice. IRENA also joined a separate, informal group for small ethics offices under the umbrella of ENMO. ENMO is comprised of the most senior ethics officers from public multi-lateral organisations, including the United Nations, international financial institutions and other international civil service organisations. It provides a forum enabling IRENA to access resources and best practices worldwide.

H. Conclusion

35. The Agency is committed to strengthening ethical practices and ensuring adherence to the highest standards of ethical behaviour because the Agency recognizes that high standards of conduct and the values of integrity, professionalism, and respect for diversity are essential to success of its staff, its objectives, and its mission.