



SECRETARIAT

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Distribution: All staff members at Headquarters and established offices	Staff Regulations: 1.1, 1.3 & 1.5 Staff Rules: 101.01, 101.03, 201.02, 201.06 & 301.02
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DIRECTOR GENERAL'S BULLETIN**UNIDO Policy on Financial Disclosure and Declaration of Interests**

1. For the purpose of implementing the relevant provisions of Staff Regulations 1.1, 1.3 and 1.5, Staff Rules 101.01, 101.03, 201.02, 201.06 and 301.02, and the UNIDO Code of Ethical Conduct, and for the purpose of extending the applicability of the present Policy to other personnel, the Director General hereby promulgates the following revised Policy, which shall supersede the Policy promulgated under the Director General's bulletin UNIDO/DGB/(M).118, dated 4 May 2010, with immediate effect.

Section 1 - Purpose

2. The purpose of the present Policy is to protect the reputation of the Organization and of individual members of the personnel by establishing effective internal control measures to address the risks of actual, perceived or potential conflicts of interest, which may arise from the exercise of an official function or the performance of official duties and responsibilities for or on behalf of UNIDO. The Policy aims to strike an appropriate balance between the private interests of UNIDO personnel and their obligations towards the Organization.

Section 2 – Definitions

3. The following definitions shall apply for the purposes of the present Policy:
 - (a) *Ethics and Accountability Office (EAO)*: the office responsible for administering this Policy;
 - (b) *Staff member*: any individual serving UNIDO on an appointment under the 100-, 200- or 300- series of the Staff Rules;
 - (c) *Personnel*: all individuals in service with UNIDO, independent of their contractual arrangement, including personnel employed under Individual Service Agreements;
 - (d) *Spouse*: an individual whose personal status has been recognized as such by UNIDO for the purpose of UNIDO entitlements and/or other official purposes;

- (e) *Dependant*: any individual other than a spouse whose personal status has been recognized as such by UNIDO;
- (f) *Relative*: a spouse, a child, a parent, a brother, a sister;
- (g) *Conflict of interest*: a situation in which an individual's personal interests interfere with the performance of their official duties, or with their contractual obligations towards UNIDO, or call into question the qualities of integrity, independence and impartiality required by the status of an international civil servant. More detailed information about conflicts of interest and prohibited personal interests is provided in paragraphs 10 and 11 of the UNIDO Code of Ethical Conduct, which are reproduced as Annex I to this Policy.

Section 3 - Parties required to submit a Financial Disclosure and Declaration of Interests Statement (hereinafter, "FD/DI statement" or "statement")

- 4. The Director General.
- 5. The following staff members and other personnel:
 - (a) All staff members at the P-5 or L-5 level and above;
 - (b) Allotment holders and alternate allotment holders;
 - (c) All staff members who are procurement officers or whose functions include significant and substantive participation in the procurement process, including the procurement of services from individual consultants and experts;
 - (d) All staff members who have authority to influence the recruitment of staff or the hiring of individual consultants and experts;
 - (e) All staff members whose principal occupational duties relate to the investment of financial assets of UNIDO or the management of any accounts for which UNIDO has fiduciary or custodial responsibility;
 - (f) All staff members whose principal occupational duties relate to oversight activities;
 - (g) Personnel of the EAO;
 - (h) Any other personnel whose duties include those described under (b) to (f) above;
 - (i) Members of the Procurement Committee, their alternates and the secretariat thereof.
 - (j) An individual who is offered an appointment/contract with UNIDO and who is requested to file a FD/DI statement.
- 6. The Director General may determine additional personnel as having to file a FD/DI statement under the provisions of this Policy.
- 7. UNIDO Goodwill Ambassadors are exempted from filing FD/DI statements.

Section 4 - Guiding principles for processing FD/DI statements

- 8. The review of FD/DI statements and the resolution of identified conflicts of interest shall be governed by the following principles:

- (a) The disclosures required of personnel will be the minimum needed by UNIDO to identify and resolve actual, perceived or potential conflicts of interest;
- (b) The procedures for disclosing, reviewing and resolving conflicts of interest will keep to a minimum the administrative workload for both, personnel concerned and the EAO;
- (c) The disclosures will only be used as prescribed by the Director General in the present Policy;
- (d) Personnel will, to the best of their knowledge and ability, assist the EAO in verifying the accuracy of declared information;
- (e) Non-compliance with the Policy, as specified in Section 6, may constitute misconduct, for which disciplinary measures may be imposed;
- (f) FD/DI statements shall be certified by the individual concerned, confirming, inter alia, that the submitted disclosure or declaration is true, correct and complete to the best of his/her knowledge and belief.

Section 5 - Administration and review of the FD/DI statements

- 9. Administration of the present Policy will be carried out by the EAO.

Filing procedures

10. Forms.

To file a FD/DI statement, personnel should use the form annexed to the present Policy in Annex II or download it from the UNIDO Intranet (under Ethics).

11. When to file.

- (a) In the case of individuals already in UNIDO service, the statements shall be filed once a year by 31 March of each year in respect of the period from 1 January to 31 December of the previous year and, where relevant, their current circumstances. If the statement is not received by the established deadline, the individual concerned will receive from the EAO a single written reminder to that effect. Such a reminder will, however, be without prejudice to the provisions of paragraph 26, below.
- (b) An individual who is unable to comply with the deadline for submission should submit to the EAO a written request for extension of time, providing a detailed justification. The EAO will, based upon the particular circumstances in each case, determine whether such extension is warranted and notify the individual accordingly.
- (c) The Director General may require an individual to submit a FD/DI statement on an *ad hoc* basis, in which case the individual will have 30 calendar days to comply with such request.

12. How and where to submit.

- (a) Each FD/DI statement shall be filed in an envelope addressed to the Ethics Office;
- (b) The envelope shall be sealed, dated and clearly marked "Personal and Confidential – FD/DI statement of [full name of the individual]";
- (c) The statement shall be submitted to the EAO by the individual concerned either in person or, in the case of an individual whose duty station is away from Headquarters, by UN/UNIDO pouch or registered mail;
- (d) The EAO may mandate alternative means of submission (e.g. via IT application);

- (e) The EAO shall, upon request, acknowledge receipt of the statement in writing;
- (f) Personnel of the EAO shall submit their statements to the Managing Director, Directorate of Corporate Management and Operations (CMO).

Procedures for the review of FD/DI statements and resolution of identified conflicts of interest

- 13. The EAO will maintain a register of all filed statements to monitor compliance with the Policy.
- 14. The EAO will review all received statements in consultation, if necessary, with the individual concerned. The individual concerned shall assist the EAO with the review of his/her statement and with verifying the completeness and accuracy of the declared information including, *inter alia*, by providing explanations, clarifications and supporting documentation, if and as requested. A sample of statements may be subjected to further verification.
- 15. Where the review of the statement results in the identification of any actual, perceived or potential conflict of interest, the individual concerned shall fully cooperate with the EAO in identifying the most appropriate form of resolution of that conflict of interest and in resolving it expeditiously, within the agreed timeframe, in the best interests of UNIDO, and in accordance with the advice of the EAO. Once the conflict in question has been resolved, the individual concerned shall report the fact to the EAO in writing, together with the appropriate documentary evidence. Where the identified conflict of interest is resolved, if applicable, by the Organization, the EAO shall notify the individual in writing.
- 16. The EAO may consult the Department of HRM or the Office of Legal Affairs when assessing an actual, perceived or potential conflict of interest or an appropriate form of resolution of that conflict of interest.
- 17. Where the individual concerned (i) fails to file the required FD/DI statement or to disclose an actual or potential conflict of interest as defined in the present Policy, or (ii) intentionally submits false or misleading information in a FD/DI statement, or (iii) does not cooperate with the EAO in the review of the statement, in verifying the completeness and accuracy of the declared information, or in identifying or resolving an actual, perceived or potential conflict of interest in the best interests of UNIDO, the matter may be reported by the EAO to the Director General.
- 18. The EAO shall inform the individual concerned in writing of the completion of the review and, in case of paper submissions, retain and safe keep the original statement and all supporting documentation in a re-sealed confidential envelope in line with UNIDO's retention schedule.

Filing procedure for newly hired personnel

- 19. An individual offered an appointment/contract who is required to file a FD/DI statement shall file such statement in respect of the immediately preceding 12-month period at the time of his/her initial appointment/contract within 30 days from the offer date. In exceptional circumstances a different timeframe may be set by the Department of HRM. The statement shall be submitted to the EAO and the individual concerned shall, if requested, assist the EAO with the review and verification of the completeness and accuracy of the declared information and, in case a conflict of interest has been identified, in resolving it in the best interests of UNIDO and in accordance with the advice of the EAO.
- 20. Failure to submit the statement within the established time frame and/or to cooperate with the EAO in reviewing and verifying the statement and/or in resolving the

identified conflict of interest may result in a withdrawal of the offer of appointment/contract.

Security, confidentiality, access to and use of statements

21. The FD/DI statements are privileged and confidential documents.
22. Subject to the provisions of paragraph 16, above, the FD/DI statements, their content and information obtained in the course of the review shall be accessible to and used only by the EAO. Nevertheless, access to and use thereof may be authorized by the Director General, on a case-by-case basis, for the purposes of fact-finding, internal audit, investigation, disciplinary or appeal proceedings.
23. No copies shall be made except for the purposes listed in paragraph 22, above, or as required for the effective review and implementation of this Policy by the EAO. Any copy made shall be logged in a record on file showing the date it was produced, a sequential number, and the initials of the responsible member of the EAO. Copies no longer needed for the purposes for which they were produced shall be destroyed permanently and the date of destruction logged in the file, along with the initials of the responsible member of the EAO.
24. The recipient of a copy of a statement produced under paragraph 23, above, shall bear full responsibility for the confidentiality of that copy and the information contained therein and shall keep it in a secure and safe location. The recipient shall not produce additional copies of the statement.
25. The EAO shall bear full responsibility for the confidentiality of the statements and the information contained therein. Accordingly, envelopes containing FD/DI statements shall at all times be kept by the EAO in a secure and safe location. Statements kept by the EAO shall be destroyed after 10 years from the date of submission.

Section 6 - Non-compliance

26. Disciplinary and/or administrative action may be taken under the terms of an individual's appointment/contract in case of:
 - (a) Failure to file the required FD/DI statement within the established time frame or to disclose an actual, perceived or potential conflict of interest as defined in the present Policy;
 - (b) Intentional submission of false or misleading information in an FD/DI statement;
 - (c) Failure to cooperate with the EAO, for example, in reviewing the statement, in verifying the completeness and accuracy of declared information, or in identifying or resolving an actual, perceived or potential conflict of interest; or
 - (d) Failure to resolve a conflict of interest as directed by the EAO.

Code of Ethical Conduct

10) Conflict of Interest

- (a) Conflicts of interest arise when personnel benefit improperly – directly or indirectly – or allow a third party to benefit improperly, from their association in the management or holding of a financial or other private interest in an entity that engages in business or transactions with UNIDO.
- (b) Personnel must carry out their official duties in a manner that prevents real, apparent or potential conflicts of interest from arising.
- (c) Personnel must disclose to their supervisor and/or the Director General in advance or as soon as they become aware of it, any potential or actual conflict of interest that arises in the course of carrying out their duties. If in doubt about disclosing information, personnel shall initially consult the Ethics Office for advice.
- (d) In addition, concerned personnel must also comply with the UNIDO Policy [on] Financial Disclosure and Declaration of Interests.
- (e) In particular:
 - 1) Personnel must not solicit or accept any benefits including economic benefit, for themselves or allow a third party to benefit improperly, directly or indirectly;
 - 2) Personnel must not assist private entities, governments or persons in their dealing with UNIDO where this would result in their preferential treatment;
 - 3) Personnel must not take advantage of or benefit or allow a third party to benefit improperly, directly or indirectly, from information obtained in the course of their official duties and that is not generally available to the public;
 - 4) Personnel must not directly or indirectly use, or allow the use of, UNIDO property and that entrusted to UNIDO of any kind, for anything other than officially approved activities;
 - 5) Personnel must not allow their actions and decisions to be influenced by the prospect of employment for themselves and their family members with parties who have dealings with UNIDO.

11) Outside Employment and Activities

Staff members¹

- (a) It is the obligation of staff members to devote their energies to the work of UNIDO. It is therefore improper for staff members to engage, without prior authorization, in any outside activity, whether remunerated or not, that interferes with that obligation or is incompatible with their employment status with UNIDO or conflicts with the interests of the Organization. Any questions on this point should be referred to the Ethics Office for advice.
- (b) Staff members, subject to the provisions of (a) above, are encouraged to participate in outside professional activities that foster contacts with private and public bodies and thus serve to maintain and enhance their professional and technical competencies.

¹ Staff Rules 101.01, 201.01, 301.02.

- (c) When requesting authorization for engagement in an outside activity under paragraph (a) above, staff members must disclose the nature and scope of the activity and whether any honorarium or other compensation will be received.
- (d) Staff members on leave, with or without pay, must bear in mind that while on approved leave of absence they remain subject to the terms of their appointments and contracts with UNIDO. Accordingly, staff members may only engage in outside activities during leave, paid or unpaid, after receipt of a written authorization.
- (e) While retaining the right to vote, in view of the independence and impartiality that staff members are expected to maintain, they must not participate in political activities, such as standing for election or holding a political office. Staff members must exercise discretion in their support for a political party or campaign, and must not accept or solicit funds, write articles, or make public speeches, statements or endorsements to the press for this purpose. This does not, however, preclude participation in local community or civic activities, provided that such participation is consistent with service in UNIDO. These cases require the exercise of judgment and where there is any doubt, staff members must seek advice of the Ethics Office.
- (f) In general, staff members may be members of a political party provided that its prevailing views and the obligations imposed on its members are consistent with the staff's status as international civil servants.

Other personnel

- (g) UNIDO personnel other than staff as defined in Section I (c) above while performing their work for UNIDO may, without prior written authorization from UNIDO, engage or continue to be engaged in the outside employment or activities subject to the terms of their respective contracts with UNIDO or similar arrangement. In this regard, personnel is also expected to disclose any such employment or activity and its nature and scope to UNIDO prior to the commencement of their relationship with UNIDO and/or prior to the commencement of the outside employment or activity. Any such outside employment or activity must be compatible with the purposes and principles of the United Nations and UNIDO and the proper discharge of the duties by such personnel on behalf of UNIDO. Without prejudice to this principle, such other personnel who are employed by UNIDO on a full-time basis for continuous periods of six months or longer may engage in a new outside employment or activity during the course of their relationship with UNIDO only upon a written authorization from their UNIDO supervisor(s), which shall be granted in accordance with the principles and conditions outlined in paragraphs (a) to (f) above.

FINANCIAL DISCLOSURE AND DECLARATION OF INTERESTS

This form is to be used by all personnel who are required to file a Financial Disclosure and Declaration of Interests Statement under the UNIDO Policy on Financial Disclosure and Declaration of Interests.

The rate of exchange to the euro shall be the UN operational rate of exchange as of 31 December of the reporting year (see the website of the International Civil Service Commission). Estimations of value must be as accurate as possible as assessed by the individual to the best of their knowledge.

This form shall be completed as fully as possible and certified on the last page. Additional pages may be added, if need be and as appropriate. Upon completion, this form shall be put into an envelope addressed to the Ethics and Accountability Office (EAO), which shall be sealed, dated and clearly marked “Personal and Confidential – FD/DI Statement of [full name of the individual]”. The envelope with the enclosed duly completed and certified form shall be submitted to the EAO either in person or, in the case of the individual whose duty station is away from UNIDO Headquarters, by UN/UNIDO pouch or registered mail.

You may request the EAO to provide you with a written acknowledgement of receipt of your submission.

Section I: Personal information

Reporting period: From: [DD/MM/YYYY] To: [DD/MM/YYYY]

1. Full Name:
[First, middle, last name]

2. Personnel Index Number:

3. Functional Title:
(Complete spelled out title)

Organizational Unit: / / /
(Acronyms)

Grade (staff) or category (ISA-holders):

4. Marital Status:

Married Single Widowed Divorced/Legally separated

5. Do you have any dependants²? Yes No

² Dependant: any individual other than a spouse whose personal status has been recognized as such by UNIDO.

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
 [Full name of the individual]

Section II: Financial Disclosure:

Part 1: Do you, your spouse, or a dependant own any stock or stock options, publicly listed or private, with the aggregate value of EUR 10,000 or more, whether currently or at any time during the reporting period?

Yes

No

If yes, please fill out the table below:

Tick the correct box		Name of the company	Asset owner (self, spouse, dependant)	Aggregate value (EUR)						
Stocks	Stock options			10,000 - 50,000	50,001 - 100,000	100,001 - 150,000	150,001 - 200,000	200,001 - 250,000	250,001 - 300,000	over 300,000
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
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<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						
<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>						

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
 [Full name of the individual]

Part 2: Do you, your spouse, or a dependant own a company or business, or a share of it, whether currently or at any time during the reporting period (other than listed in Part 1)?

Yes

No

If yes, please fill out the table below:

Name of the company/business	Number of shares in %	Area of activity (please provide details)	Owner of the company/business (self, spouse, dependant)
	%		
	%		
	%		
	%		

Part 3: Do you, your spouse, or a dependant have any aggregate liabilities of EUR 50,000 or more, whether currently or at any time during the reporting period, excluding liabilities owed to a parent, a sibling, or a dependent child?

Yes

No

If yes, please fill out the table below:

Type of liability	Date incurred (Year)	Term (if applicable) (Year)	Debtor (self, spouse, dependant)	Value EUR			
				50,000 - 100,000	100,001 - 250,000	250,001 - 500,000	over 500,000
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
 [Full name of the individual]

Part 4: Did you, your spouse, or a dependant receive any income from a source or sources other than UNIDO, excluding UN pension benefits, totaling EUR 10,000 or more during the reporting period?

Yes

No

If yes, please fill out the table below:

Type(s) of income	Source(s) of income	Income holder (self, spouse, dependant)	Gross income (EUR)						
			10,000 - 40,000	40,001 - 80,000	80,001 - 120,000	120,001 - 160,000	160,001 - 200,000	200,001 - 240,000	over 240,000
			<input type="checkbox"/>						
			<input type="checkbox"/>						
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			<input type="checkbox"/>						
			<input type="checkbox"/>						

Section III: Declaration of interests:

Part 1: Are you, your spouse, a dependant, or anyone with whom you have a close relationship (including a partner, a member of your family or a friend), actively associated with the management of, or the holder of a financial interest in, any business concern – whether currently or at any time during the reporting period – where your position with UNIDO would make it possible for you to promote the interests of that concern, or to derive a benefit from that concern?

- Yes No

If yes, please provide details in the table below:

Details of the personal interest	Personal interest holder (self, spouse, dependant, partner, other)

Part 2: Do you, your spouse, or a dependant, whether currently or at any time during the reporting period, have any leadership or policymaking role in any non-UNIDO entity (including membership of a public or private-sector board)?

- Yes No

If yes, please give details in the table below:

Details of the leadership/policymaking role	Role holder (self, spouse, dependant)

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
[Full name of the individual]

Part 3: Do you have any outside employment or occupation, or any other outside activity³ related to the work of UNIDO that you undertake in a personal capacity (including participation in a national advisory body or commission)?

If a request for approval of the outside activity was submitted to HRM, and if a decision was rendered, please attach supporting documents to your submission of this form.

Yes

No

If yes, please give details in the table below:

Details of the activity	Approved by UNIDO official (yes/no)	Name of approving official	Date of approval [DD/MM/YYYY]
			/ /
			/ /
			/ /

Part 4: Are you involved in any other activity – whether currently or at any time during the reporting period and whether or not the activity is subject to approval by the Director General under the applicable Staff Regulations and Rules – which could have an impact on your objectivity or independence in the performance of your official duties or otherwise negatively affect the image of UNIDO?

Yes

No

If yes, please give details in the text box below:

³ Outside activity: see paragraph 11 of the Code of Ethical Conduct and Administrative Circular UNIDO/DA/PS/AC.69, dated 17 December 1990.

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
[Full name of the individual]

Part 5: Do you have a spouse or any relatives employed in the United Nations system?

Yes

No

If yes, please give details in the table below:

Full name of the relative (First, middle, last name)	Relationship	Name of the Organization (Acronym accepted)	Function (Official functional title)	Since when [DD/MM/YYYY]
				/ /
				/ /
				/ /
				/ /
				/ /

Part 6: Did you, whether recently or at any time during the reporting period, accept any honour or decoration, or any gift, remuneration, favour or economic benefit of more than nominal value⁴ from any source external to UNIDO (including a Government, a commercial firm, or other entity)?

Yes

No

If yes, please give details in the text box below:

⁴ Nominal value: currently set at EUR 100. See the Code of Ethical Conduct.

Financial Disclosure and Declaration of Interests of _____ for the reporting year _____
[Full name of the individual]

Section IV: Certification and affirmation:

I certify and affirm that the declarations and disclosures I have made in this form, including this certification and affirmation, are true, complete and correct to the best of my knowledge and belief.

I understand that I may be requested to assist the Ethics and Accountability Office with the review and verification of my Financial Disclosure and Declaration of Interests Statement as well as with resolving any identified conflict of interest in the best interests of UNIDO and in accordance with the advice of the Ethics and Accountability Office.

I understand that failure to provide true, complete and correct information in this form to the best of my knowledge and belief, or failure to cooperate in good faith with the Ethics and Accountability Office in reviewing and verifying my Statement or in resolving any identified conflict of interest, may result in serious consequences for me, including sanctions as defined in the Policy.

Signature

Please print your full name

Date of signature

Place of signature