



**WORKING PAPER**

**COUNCIL — 234TH SESSION**

**Subject No. 20: Periodic reports by the Secretary General**

**ANNUAL REPORT OF THE ETHICS OFFICE FOR 2024**

(Presented by the Secretary General)

**EXECUTIVE SUMMARY**

The ICAO Framework on Ethics approved by the Council at the sixth meeting of its 193rd Session requires the Ethics Advisor to submit an annual report to the Council, unchanged by the Secretary General, together with any comments of the Secretary General thereon. The Ethics Advisor, Mr. Fabio Buonomo, has prepared an annual report to the Council for the period from 1 January to 31 December 2024.

The Secretary General transmits herewith to the Council the Annual Report of the Ethics Office for 2024, on which the Secretary General has no comments.

**Action:** The Council is invited to

- a) take note of the present report and express support for the work and needs of the Ethics Office; and
- b) approve the recommendation to add a new category of “unethical conduct” to those included in paragraph 41 of the ICAO Framework on Ethics, as proposed in paragraph 3.4 of this report.

<i>Strategic Objectives:</i>	This working paper relates to all Strategic Objectives, Supporting Strategies, and the Transformational Objective.
<i>Financial implications:</i>	To be determined.
<i>References:</i>	<a href="#">The ICAO Service Code</a> <a href="#">C-DEC 193/6</a> <a href="#">C-DEC 223/10</a> <a href="#">C-DEC 231/7</a> <a href="#">C-WP/15330</a> <a href="#">C-WP/15474</a> <a href="#">C-WP/15564</a> <a href="#">IA/2022/4</a> <a href="#">JIU/REP/2021/5</a>

## 1. INTRODUCTION

1.1 The present report – on which the Secretary General has no comments – is submitted in accordance with paragraph 91 f) of the ICAO Framework on Ethics (Annex I to the ICAO Service Code, hereafter the “Ethics Framework”), which was approved by the Council at the sixth meeting of its 193rd Session ([C-DEC 193/6](#)). It outlines the activities undertaken by the Ethics Office during the period from 1 January to 31 December 2024.

1.2 The Ethics Office is independent from all other services and functions while reporting administratively to the Secretary-General. The Ethics Advisor has both formal and informal access to the ICAO Council, the Evaluation and Audit Advisory Committee, the External Auditor, the investigative entity, and the external ethics entity.

1.3 The Ethics Office functions on the principles of independence, impartiality, and confidentiality, and each of its activities aims to foster and promote a culture of ethics, integrity, accountability, transparency, and respect within ICAO. In this context, the Ethics Office provides confidential advice and guidance on ethical challenges and dilemmas to management and staff, regardless of contract type and duration. It also assists the Secretary General and the Council in cultivating and nurturing a strong organizational culture of ethical behaviour and decision-making, whereby ICAO management and staff observe and perform their functions in a manner consistent with the highest standards of conduct and come forward without fear of retaliation. The Office also serves as a key advocate of ICAO principles and values, including through awareness and outreach activities, thereby enhancing the trust in and the reputation of the Organization, both internally and externally.

## 2. MANDATE OF THE ETHICS OFFICE

2.1 Pursuant to paragraph 91 of the Ethics Framework, the functions of the Ethics Advisor include the following:

- a) providing confidential ethics advice and guidance to all staff members and protecting all confidential information received from staff and other sources;
- b) providing advice to the Secretary General and the Council on policies and procedures related to ethical issues;
- c) administering the ICAO policy for the protection of staff against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations;
- d) prevention and outreach through the development and implementation of mandatory ethics training programmes and internal communications, including contribution to ICAO’s website on the ethics functions; and
- e) developing, implementing and administering ICAO’s financial disclosure and conflict of interest declaration programmes.

## 3. SUMMARY OF ACTIVITIES UNDERTAKEN IN 2024

3.1 **Advice and guidance:** The provision of confidential advice and guidance is a cornerstone of the Ethics Office’s mandate and is essential for fostering a culture of ethics and integrity within ICAO. By offering consistent, actionable, and timely guidance, the Ethics Office helps all ICAO personnel and management in making informed and appropriate decisions at both personal and professional levels, in the best interests of the Organization. Ethics advice also enables personnel to better identify and address actual, potential, or perceived conflicts of interest, as well as other ethical

dilemmas or sensitive workplace situations, before they escalate into more serious concerns. Acting as a trusted consultative resource, the Ethics Office also plays an important risk-mitigating role, promoting ongoing awareness of and adherence to the applicable regulatory framework and standards of conduct expectations in a healthy working environment.

3.2 In 2024, the Ethics Office provided confidential advice and guidance on various issues, through in-person and virtual meetings or in writing. The Office received 235 requests for advice and guidance. This included 125 requests categorized as “Individual” (queries more personal in nature), 102 as “Management” (queries by members of ICAO personnel in their official capacity), and 8 as “External” (queries from outside ICAO). The Office also registered 57 requests involving standards of conduct, 50 administrative-related activities, 43 outside activities<sup>1</sup>, 31 conflicts of interest, 29 financial disclosure programme, 16 gifts, and 9 misconduct/wrongdoing<sup>2</sup> (for further details, including the locations involved, see Appendix A).

3.3 In this context, the Ethics Office has observed a significant increase in requests related to standards of conduct and other ethical matters (such as conflicts of interest, financial disclosure programme, outside activities, and gifts), in contrast to a simultaneous decrease in requests concerning misconduct/wrongdoing. This is considered a positive development resulting from numerous awareness activities conducted by the Ethics Office during the reporting period along with the enhancement of ICAO’s capability in terms of informal and independent dispute resolution mechanisms, including the establishment of an independent Ombudsperson position and the creation of an Inter-Office Advisory Group (IOAG) (for further details see paragraph 3.7 below).

3.4 It is important to note that a significant number of requests for advice and guidance received by the Office, both at managerial and personnel levels, involved the transmission or dissemination of unsubstantiated rumours, which is a concerning behaviour that is not directly reprimanded under the ICAO Ethics Framework<sup>3</sup>. Given the potential risks to the Organization associated with such conduct, the Ethics Office recommends amending paragraph 41 of the Ethics Framework to include the “*transmission or dissemination of unsubstantiated rumours*” as a new category of “unethical conduct” that could be reported as misconduct<sup>4</sup>.

3.5 **Standard-setting and policy support:** International Organizations require frequent and constant monitoring and advocacy on ethical culture and accountability. In this context, a core function of the Ethics Office is to provide ethics-related advice and substantive input to the Secretary General, the Council and its organs, and senior management to ensure that ICAO’s policies, rules, procedures, and practices reflect, reinforce, and promote ethical standards and integrity institutionally.

3.6 During the reporting period, the Ethics Office provided inputs on 48 standard-setting and policy matters (5 of which were proactively submitted *ex officio* by the same Ethics Office) on a range of topics, including, but not limited to, flexible working arrangements, the use of artificial intelligence, Administrative Instructions on information security, recruitment of staff, and hospitality and retreats. The Office also actively participated in the revision of the *Policy on Interactions with External Parties*, financial regulations, and guidelines for the ICAO internship programme.

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<sup>1</sup> Under the ICAO regulatory framework there is no explicit requirement for the Secretary General to ask for the Ethics Advisor’s view before deciding on requests to engage in an outside activity, while staff may ask the Ethics Advisor for confidential preliminary advice on possible future requests. Notwithstanding this, it has been the consistent practice of the Secretary General to seek the Ethics Advisor’s input before deciding on such requests.

<sup>2</sup> In accordance with paragraph 87 of the Ethics Framework, the advice and guidance provided involved information on the applicable formal or informal conflict resolution mechanisms, and not the merits of possible allegations of misconduct.

<sup>3</sup> Paragraphs 46 and 46quater of the Ethics Framework just state that reporting misconduct “*shall not be used to transmit or disseminate unsubstantiated rumours*”, while the subsequent paragraph 65 provides that the same behaviour is not a “*protected activity*” for the purpose of requesting protection against retaliation.

<sup>4</sup> Currently, paragraph 41 of the Ethics Framework provides that “*Unethical conduct is behaviour that is contrary to the core values and principles that are enshrined in this framework and includes discrimination; harassment, including sexual harassment; intimidation, retaliation and abuse of authority; failure to disclose the existence of a conflict-of-interest situation or to comply with a request by ICAO to address it; corruption; misuse of corporate information and breach of confidentiality; and nepotism, be it for personal benefit or for favours to others.*”.

3.7 The Ethics Advisor provided strategic advice on the establishment of the Inter-Office Advisory Group (IOAG), which is a body composed of independent offices at the senior level to exchange information and promote the prevention of workplace conflict and abusive conduct, through targeted advice to the Secretary General and senior leadership. Since its creation, the Ethics Advisor has actively participated in the work of the IOAG.

3.8 **Protection against retaliation:** The Ethics Advisor administers the ICAO policy on protection against retaliation, which applies to all categories of ICAO personnel who allege that they have been subjected to or threatened with detrimental action for engaging in good faith in a *protected activity* (i.e., reporting misconduct and/or cooperating with a duly authorized investigation or audit). The purpose of the policy is to enhance accountability within ICAO and ensure that staff can engage in a *protected activity* without fear of retaliation.

3.9 In 2024, the Ethics Advisor reviewed and provided preliminary confidential advice on one case of perceived retaliation. He also received one formal request for protection against retaliation. After a review of the case, it was determined that the complaint did not raise a *prima facie* case of retaliation under the Ethics Framework. At the same time, the Ethics Advisor submitted two confidential recommendations to the Secretary General under paragraph 71 b) of the Ethics Framework<sup>5</sup>. Subsequently, the staff concerned requested the United Nations Ethics Office (UNEO) to conduct a further review of the matter, in accordance with paragraphs 80-81 of the Ethics Framework and the *ad hoc* Agreement signed between the UNEO and ICAO. After conducting its review of the case, the UNEO recommended to refer the matter for investigation. During the reporting period, the UNEO also conducted a separate independent review of a case assessed by the ICAO Ethics Advisor in 2023 and concurred with the determination that no *prima facie* case of retaliation had been established, resulting in the case being closed.

3.10 **Training, education and outreach:** Training, outreach, and awareness-raising initiatives are essential for helping ICAO personnel understand and recognize their standards of conduct expectations to the Organization, forming a key component of the Ethics Office's mandate. By focusing on knowledge and skill-building as related to ICAO principles, values, and standards of conduct, the Office developed numerous education and outreach initiatives that served to assist ICAO personnel in acting in the best interests of the Organization and protecting ICAO's reputation.

3.11 Based on the existing contract between ICAO and the United Nations Staff System College (UNSSC), in 2024 the Ethics Office – in coordination with other ICAO services, when necessary – developed and launched three online ethics training courses on *Ethics and Integrity at ICAO*, *Protection Against Retaliation at ICAO for Managers and Supervisors*, and *Anti-Fraud and Anti-Corruption Awareness at ICAO*. The Office also worked with the UNSCC on the development of three additional courses on *Prevention of Sexual Harassment for Managers and Supervisors*, *Conflicts of Interest for Managers and Supervisors*, and *Prevention of Sexual Exploitation and Abuse for ICAO Personnel*, which are expected to be launched in 2025.

3.12 In 2024, the annual ICAO Leadership Dialogue was launched. The topic – *Navigating Outside Activities* – focused on the importance of ensuring that engagements of ICAO personnel in outside activities and affiliations do not lead to conflicts of interest or reputational risk to ICAO. To facilitate interactive and effective sessions, the Ethics Office also made available to participants French and Spanish versions of the relevant materials. Regrettably, only a limited number of Bureaus and Offices submitted the required input by the specified deadline. As of the issuance of this report, the Ethics Advisor has coordinated with the Office of the Secretary General to ensure full compliance with this exercise, with the aim of preparing an *ad hoc* report for the Secretary General, including findings and recommendations.

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<sup>5</sup> Paragraph 71 b) of the Ethics Framework provides that “[i]f the Ethics Advisor determines that there is no *prima facie* case of retaliation or threat of retaliation but considers there to be a managerial problem relating to a particular bureau or office, the Ethics Advisor will advise the Secretary General accordingly.”

3.13 The Ethics Office maintained and updated a dedicated intranet site for the benefit of all ICAO personnel. The site includes information on the different areas of the mandate of the Office, and dedicated pages on important topics such as ICAO's principles and values, standards of conduct, protection against retaliation, training courses, the financial disclosure programme, outside activities, and gifts. The Ethics Office also published on this site and the ICAO external website copies of the most recent Annual Reports of the Ethics Office in all ICAO official languages.

3.14 In 2024, the Ethics Office issued monthly Ethical Awareness Messages and other communications on ICAO principles, values, and standards of conduct expectations. The Office also distributed thematic posters, brochures, fact sheets, and giveaways on the same topics to managers and personnel, including those serving in the Regional Offices, and ensured that related electronic messages were displayed within the ICAO Headquarters building. The Ethics Office also engaged in outreach initiatives on the establishment of the above-referenced IOAG, as well as on ICAO's 80th anniversary.

3.15 Further, together with the Office of Internal Oversight and the Bureau of Administration and Services (Specialist, Administrative Law, Policy, and Disciplinary Matters), the Ethics Office organized ICAO's first anti-fraud and anti-corruption awareness campaign, including the launch of an *ad hoc* training course, observation of International Anti-Corruption day, issuance of targeted messages and giveaways for ICAO personnel as well as the sensibilization of relevant ICAO stakeholders, such as suppliers, vendors, business partners, and sponsors.

3.16 During the reporting period, the Ethics Advisor visited the North American, Central American and Caribbean (NACC), and European and North Atlantic (EUR/NAT) Regional Offices. Outputs of the visits included workshops for staff and confidential consultations with staff and Regional Directors. The Ethics Advisor also held dedicated sessions with various ICAO offices on thematic ethical matters, as well as introductory meetings with the newly appointed Council State representatives.

3.17 **Financial Disclosure Programme:** The Ethics Office administers the ICAO annual financial disclosure and conflict of interest declaration programme (FDP), which is designed to assist ICAO and some selected personnel<sup>6</sup> in identifying, mitigating, and managing actual, potential, or perceived conflicts of interest that may arise between staff's personal financial interests, relationships, or affiliations – and those of their immediate family members – and their ICAO functions and obligations. The primary purpose of the programme is to preserve independence and impartiality in official decision-making, while promoting organizational accountability, transparency, and public trust in ICAO and its personnel.

3.18 With the invaluable support of a temporary Administrative Assistant (Consultancy), the Ethics Advisor updated the FDP forms for greater efficiency and launched, administered, and finalized the 2024 FDP achieving 100% compliance from participants, including the President of the Council and Secretary General. *Inter alia*, the Ethics Office contacted and liaised with all eligible personnel through individual confidential communications and reviewed all Conflict-of-Interest Declarations received. Furthermore, in accordance with the existing ICAO regulatory framework, the Ethics Advisor randomly selected several Financial Disclosure Statements for assessment and verification. Where necessary, individuals were contacted and advised on appropriate mitigating actions. This verification phase was ultimately completed with no cases of conflicts of interest requiring reporting for action. The Ethics Office then confidentially filed all documentation and submitted an *ad hoc* report to the Secretary General including relevant information on compliance, statistics, and reviewed actions. It is important to note that the number of participants in the programme has gradually increased over the last four FDP exercises – from 162 in 2021 to 190 in 2022, 222 in 2023, and a total of 241 personnel in 2024, including staff members, consultants, and secondees.

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<sup>6</sup> ICAO personnel who are required to file include: a) all personnel at the D-1 level and above; b) allotment holders, certifying Officers and their alternates; c) all staff members, consultants, and secondees whose duties relate to the procurement or contracting of goods and services for ICAO; d) staff members, consultants, and secondees involved in safety and security audits and CDI Field Operations Officers; and e) all staff members, consultants, and secondees whose duties relate to the investment of the assets of ICAO.

3.19 To implement a pending recommendation from the Joint Inspection Unit (JIU)<sup>7</sup>, the Ethics Office engaged in preliminary discussions with relevant ICAO internal stakeholders to explore the possibility of developing in the near future a reliable and secure electronic platform by using existing ICAO resources and capabilities, within the context of the ongoing ICAO Information Technology strategy on digital transformation.

3.20 **United Nations Coherence:** The Ethics Office promotes and supports collaboration with other ethics functions, viewing it as a key tool for achieving its mandate. In 2024, the Ethics Advisor maintained his active involvement in the Ethics Network for Multilateral Organizations (ENMO), as well as its dedicated entity involving organizations belonging to the United Nations Chief Executives Board. The Ethics Advisor also served as a member of the ENMO Working Group on Ethics, Artificial Intelligence, and Innovative Technologies, and contributed to the works for the development of *Standards of Practice of the Ethics Function*. He also actively participated in the 16th Annual Conference of ENMO which focused, *inter alia*, on the responsible use of artificial intelligence, the importance of jurisprudence for ethics practitioners, leveraging interactive/innovative forms of training, and how to bring about culture change through ethics programmes. Finally, the Ethics Advisor engaged in bilateral relations with the Ethics Offices of other International Organizations and contributed to the finalization of a two-member peer-review report evaluating the UNEO's ethics advisory and related services.

#### 4. OBSERVATIONS AND CONCLUSION

4.1 In terms of available resources under the ICAO Regular Programme Budget for 2024, the situation of the Ethics Office remained constrained, consistent with what was reported in the past three annual reports<sup>8</sup>. As a result, during the reporting period, the Ethics Office relied on the assignment of exceptional funding from the limited 2023 carryover budget. A similar arrangement is anticipated for 2025, with the understanding that this will be reassessed should unforeseen urgent needs arise during the year. Furthermore, during the preparation of the ICAO triennial Regular Programme Budget for 2026-2028, the Secretariat agreed to support a proposal aimed at addressing some of the Ethics Office's most critical needs, to be supplemented by carryover budgets on an annual basis if necessary. While these measures are expected to alleviate some of the concerns regarding the level and sustainability of resources allocated to the Ethics Office, they will not resolve all the challenges the Office faced in properly planning activities for the effective implementation of its mandate<sup>9</sup>. In this context, the Ethics Office regrets to note that, for the second consecutive year, no nominations were submitted by any Government in response to the State letter issued in December 2022 regarding a Junior Professional Officer opportunity for the position of Associate Ethics Officer.

4.2 As mentioned above, the analysis of emerging trends related to requests for advice and guidance received by the Ethics Office in 2024 appears to confirm a growing familiarity among ICAO personnel with the standards of conduct expectations to the Organization. This is seen as a positive development, resulting not only from the training, education, and outreach activities initiated by the Ethics Office, but also and foremost by the concomitant and complementary positive initiatives led by

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<sup>7</sup> Specifically, in its report on *Review of the ethics function in the United Nations* (JIU/REP/2021/5) the JIU recommended the executive heads of United Nations system organizations to “evaluate the effectiveness and efficiency, including “value for money”, of their financial disclosure and declaration of interest programmes and, on the basis of the findings, propose changes to the relevant policies where appropriate.”

<sup>8</sup> See paragraphs 4.1 of [C-WP/15330](#), [C-WP/15474](#), and [C-WP/15564](#), where it was noted that the Regular Budget only included two lines directly associated with the Ethics Office: a) 60% of the position of the Ethics Advisor; and b) travel.

<sup>9</sup> Under these circumstances, in 2024, the Ethics Advisor was often compelled to prioritize tasks related to various areas of the mandate, sometimes at the expense of providing prompt and comprehensive advice and support. The Office's ability to carry out regular managerial and administrative responsibilities was also affected. For further analysis of the impact of the budget constraints on the Ethics Office's ability to carry out its mandate, see paragraphs 52-56 of the report of the ICAO Office of Internal Oversight on *Internal Audit Report on Ethics Framework* (IA/2022/4), while on the need for the legislative organs, governing bodies, and executive heads of United Nations entities to ensure that the ethics functions of their respective entities organizations receive an adequate level of resources (both human and financial), including through a dedicated budget line, “as a prerequisite for achieving the expected levels of integrity and accountability in an organization”, see paragraphs 86 and 298 of the JIU report on *Review of the ethics function in the United Nations* (JIU/REP/2021/5).

the Secretary General to enhance ICAO's informal and independent dispute resolution mechanisms, including, but not limited to, the establishment of an independent Ombudsperson position and the creation of the Inter-Office Advisory Group. With the anticipated launch of a network of volunteer Trustful Workplace Ambassadors overseen by the Ombudsperson in 2025, the impression is that, compared to a few years ago, the Organization is now much more mature and engaged in addressing workplace conflicts. At the same time, it should be noted that, under normal circumstances, the involvement of independent and neutral offices – such as the Ombudsperson or the Ethics Office – in dispute resolution should be considered a residual resort, i.e., only when initiatives within reporting lines have proven ineffective or unsuitable. In this regard, the Ethics Office reaffirms its previous position on the need to strengthen the existing rules regarding the roles and responsibilities of Directors, managers, and supervisors. These individuals have a duty to promote and preserve a safe and harmonious work environment and are obligated to take swift and appropriate preventive action in response to potential misconduct, particularly harassment, as soon as they become aware of such situations<sup>10</sup>. Additionally, the Ethics Office continues to consider it advisable for ICAO to explore the possibility of providing its staff with access to a skilled Staff Counsellor to assist personnel with workplace matters that may cause individuals stress or other challenges. This could be achieved either through direct contracting or by leveraging existing resources within the United Nations system.

4.3 Regarding the promotion of ethical standards and integrity institutionally, the Ethics Office considers it important to continuously update ICAO's regulatory framework on some key ethical areas to align them with United Nations best practices, in particular with regard to the engagement in outside activities and acceptance of gifts, favours, hospitalities, honours, decorations or remunerations from external sources to ICAO.

4.4 The Ethics Office welcomes the revision of the *Policy on Interactions with External Parties* in 2024, including the development of a Due Diligence Framework for Engagements with External Parties. At the same time, it wishes to express concerns regarding the related *Administrative Instructions on Interactions with External Parties* issued in November 2024. Specifically, it is the view of the Ethics Office that the document lacks references to effective and adequate tools, as well as clear assessment criteria needed by those responsible for the due diligence and risk assessment phases. These tools and criteria are essential for efficiently gathering and evaluating information to mitigate and manage ethical risks, such as potential conflicts of interest, favouritism, and undue influence. Under such circumstances, there is a concrete risk that those entrusted with assessing potential risks associated with proposed arrangements between ICAO and external parties may face significant challenges in performing their tasks effectively, and their assessments could end up being based more on personal opinions or views than on objective criteria. In this regard, it is worth recalling a recent judgment of the United Nations Dispute Tribunal (UNDT), in which it was emphasized the importance of assessing the actual realities surrounding corporate decision-making mechanisms, particularly in relation to projects and partnerships with third parties<sup>11</sup>. In this context, the Ethics Office also wishes to reiterate its previous observations that ICAO should develop effective conflict-of-interest mitigation measures through a broader holistic approach<sup>12</sup>. As such, this approach should also involve and engage relevant stakeholders, such as business partners, sponsors, members of panels and expert groups, consultative fora, and similar entities. Additionally, it would be advisable to advance in the exploration of options regarding the development of a Code of Conduct for the staff of Delegations to ICAO that would provide guidance on recommended standards of behaviour, as well as in relation to interactions between Delegations and the ICAO Secretariat, as decided by the Council in the recent past ([C-DEC 223/10](#) and [C-DEC 231/7](#) refer).

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<sup>10</sup> Paragraphs 31 and 92 of the ICAO Ethics Framework refer. See also paragraph 4.3 of [C-WP/15474](#) and 4.2 [C-WP/15564](#).

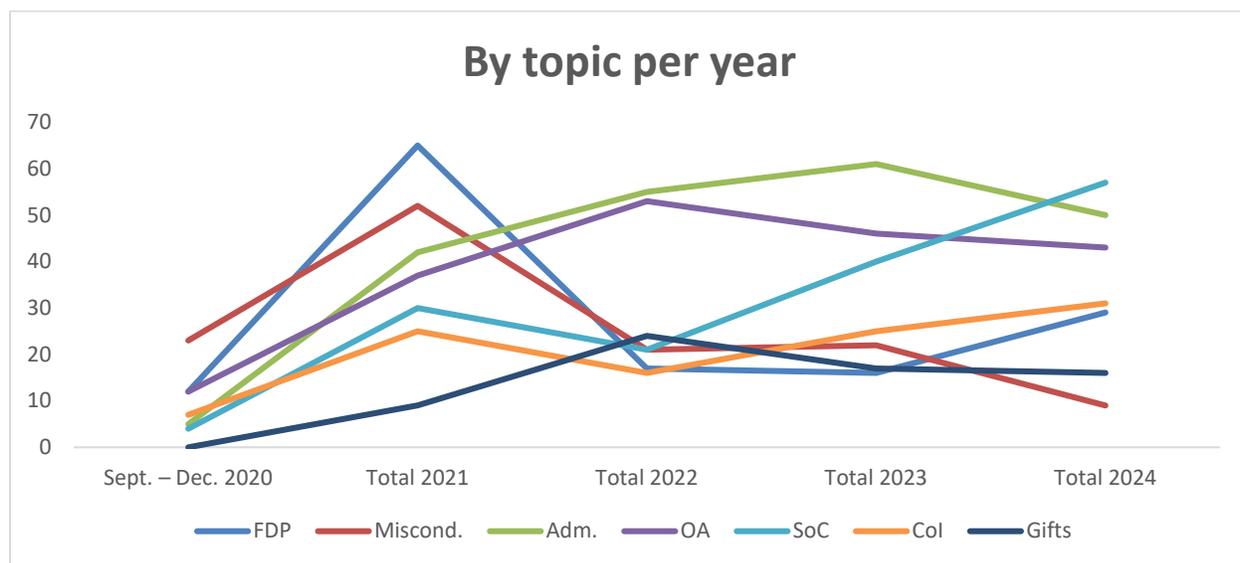
<sup>11</sup> See paragraphs 34-42 and 64-67 of [UNDT/GVA/2023/020](#). The UNDT eventually ordered a former Director of a UN entity to repay 58.8 million US dollars for losses incurred by the Organization from deals with an external party. The UNDT also commented on the risks associated with the lack of adequate expertise among members of the Secretariat's review body, and – based on the doctrine of “joint and several liability” (or “*responsabilité conjointe et solidaire*”) – the possible collective financial liability of other managers involved in the proposal, risk assessment, risk management, and decision-making.

<sup>12</sup> See paragraph 4.4 of [C-WP/15564](#).



APPENDIX A

**Advice and Guidance**<sup>13</sup>



<b><u>Topic</u></b>	<b><u>Sept. – Dec. 2020</u></b>	<b><u>Total 2021</u></b>	<b><u>Total 2022</u></b>	<b><u>Total 2023</u></b>	<b><u>Total 2024</u></b>
<i>FDP</i>	12	65 <sup>14</sup>	17	16	29
<i>Miscond.</i>	23 <sup>15</sup>	52 <sup>16</sup>	21 <sup>17</sup>	22	9 <sup>18</sup>
<i>Adm.</i>	5	42	55	61	50
<i>OA</i>	12	37	53	46	43
<i>SoC</i>	4	30	21	40	57
<i>CoI</i>	7	25	16	25	31
<i>Gifts</i>	0	9	24	17	16
<b><u>Total</u></b>	<b>63</b>	<b>260</b>	<b>207</b>	<b>227</b>	<b>235</b>

<sup>13</sup> For the purpose of the present Appendix, the following acronyms are used: “FDP” for “Financial Disclosure Programme”; “Miscond.” for “misconduct/wrongdoing”; “Adm.” for “administrative-related inquiries”; “OA” for “outside activities”; “SoC” for “standards of conduct”, and “CoI” for “conflicts of interest”.

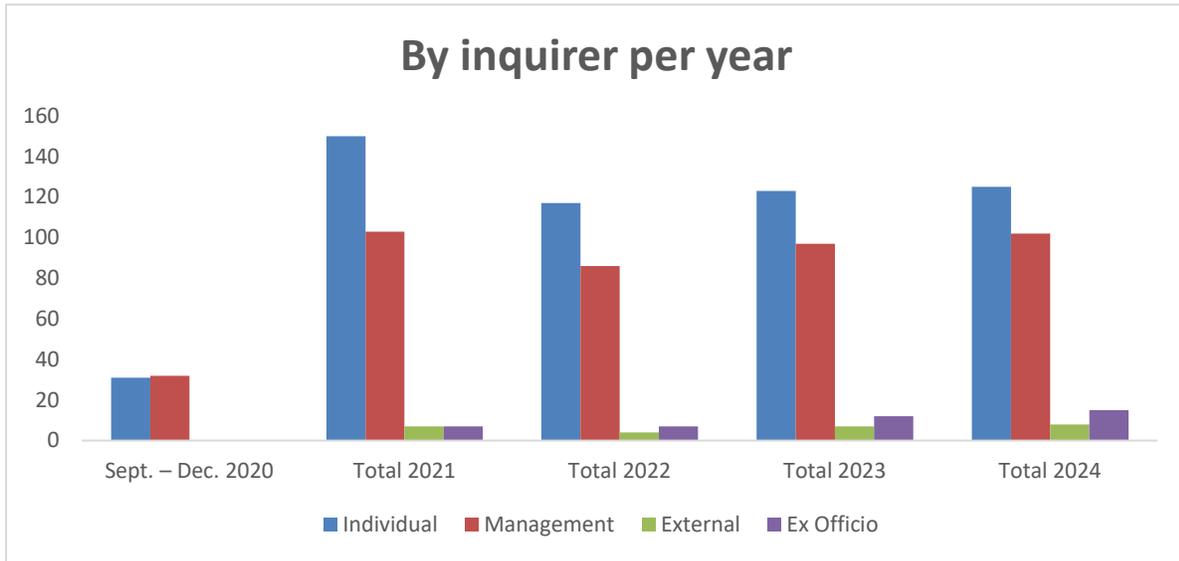
<sup>14</sup> It is worth noting that in 2021 the Ethics Office led two separate FDP paper-based exercises and numerous staff expressed concerns and difficulties in submitting the necessary documentation during a pandemic.

<sup>15</sup> This includes the provision of preliminary advice on 3 cases of potential/perceived retaliation.

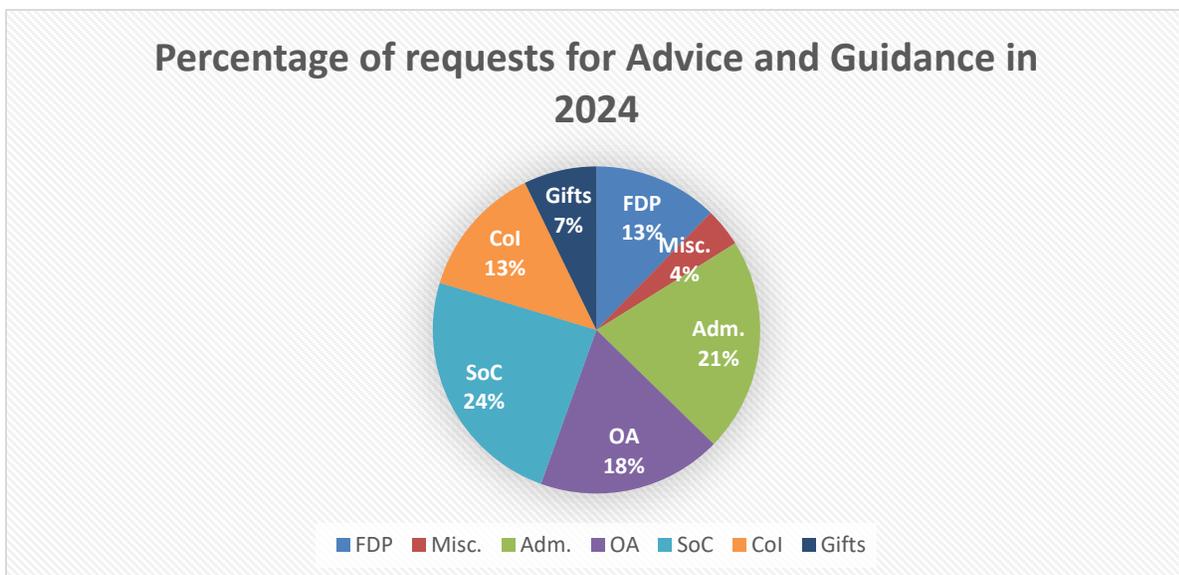
<sup>16</sup> This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.

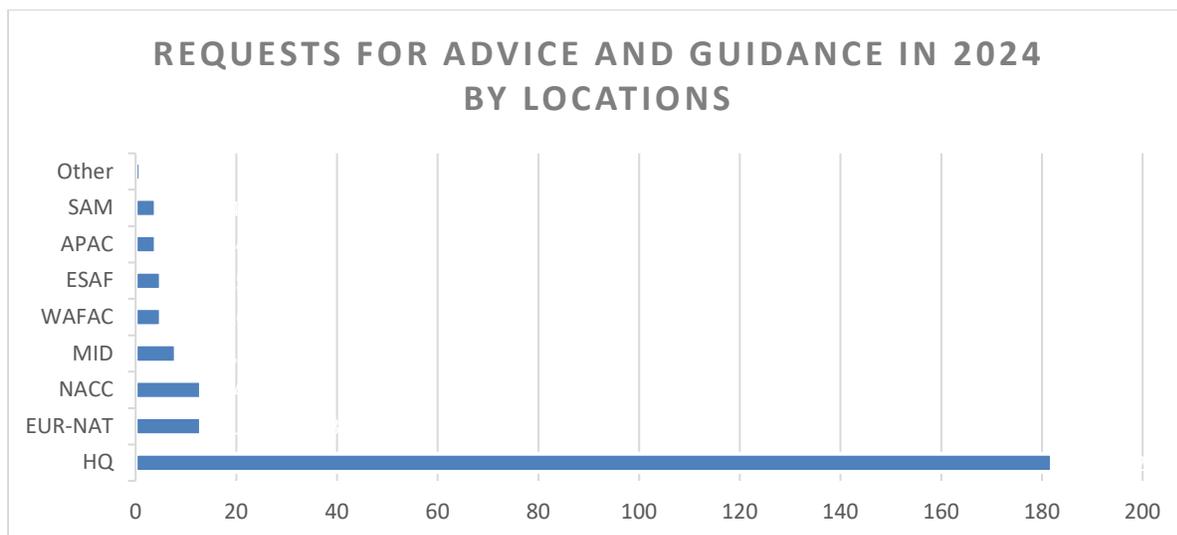
<sup>17</sup> This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.

<sup>18</sup> This includes the provision of preliminary advice on 1 case of potential/perceived retaliation



	<b>Sept. – Dec. 2020</b>	<b>Total 2021</b>	<b>Total 2022</b>	<b>Total 2023</b>	<b>Total 2024</b>
<i>Individual</i>	31	150	117	123	125
<i>Management</i>	32	103	86	97	102
<i>External</i>	0	7	4	7	8
<b>Total</b>	<b>63</b>	<b>260</b>	<b>207</b>	<b>227</b>	<b>235</b>
<i>Ex Officio</i>	0	7	7	12	15



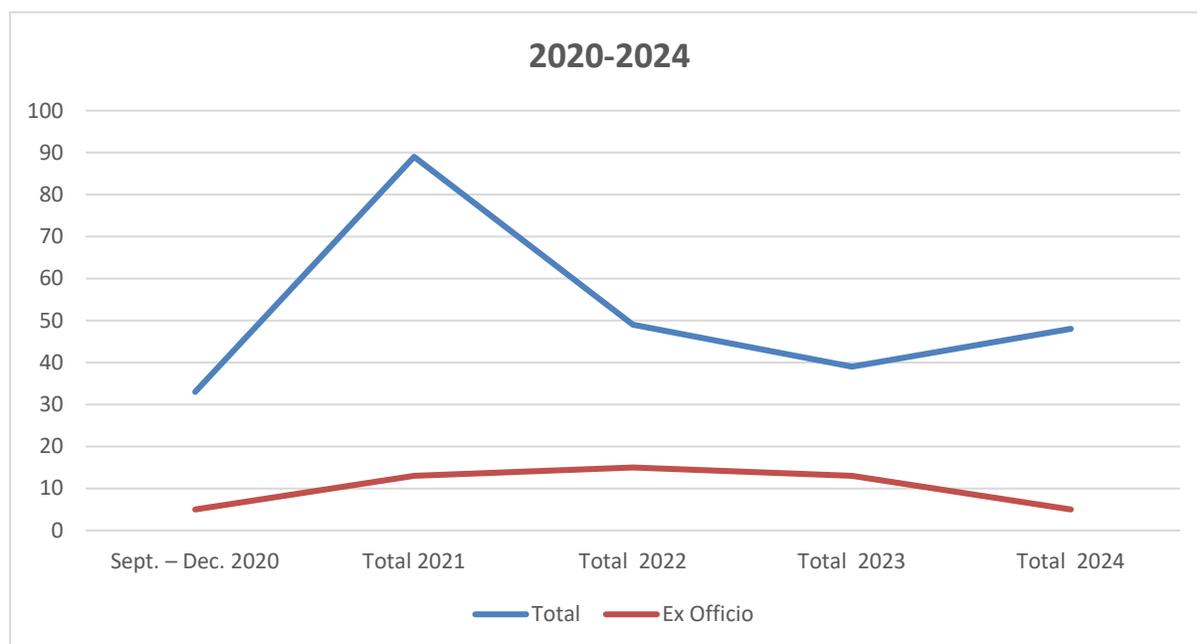


	<u>January – April</u>	<u>May – August</u>	<u>Sept. – Dec.</u>	<u>Total</u>
<i>HQ</i>	44	59	79	182
<i>EUR-NAT</i>	2	7	4	13
<i>NACC</i>	6	4	3	13
<i>MID</i>	2	0	6	8
<i>WAFAC</i>	1	0	4	5
<i>ESAF</i>	1	2	2	5
<i>APAC</i> <sup>19</sup>	0	4	0	4
<i>SAM</i>	0	2	2	4
<i>Other</i>	0	1	0	1
<b><u>Total</u></b>	<b>56</b>	<b>79</b>	<b>100</b>	<b>235</b>

<sup>19</sup> Includes also the Regional Sub-Office and the Liaison Officer for Pacific Small Island Developing States.

APPENDIX B

**Standard-setting and policy support**



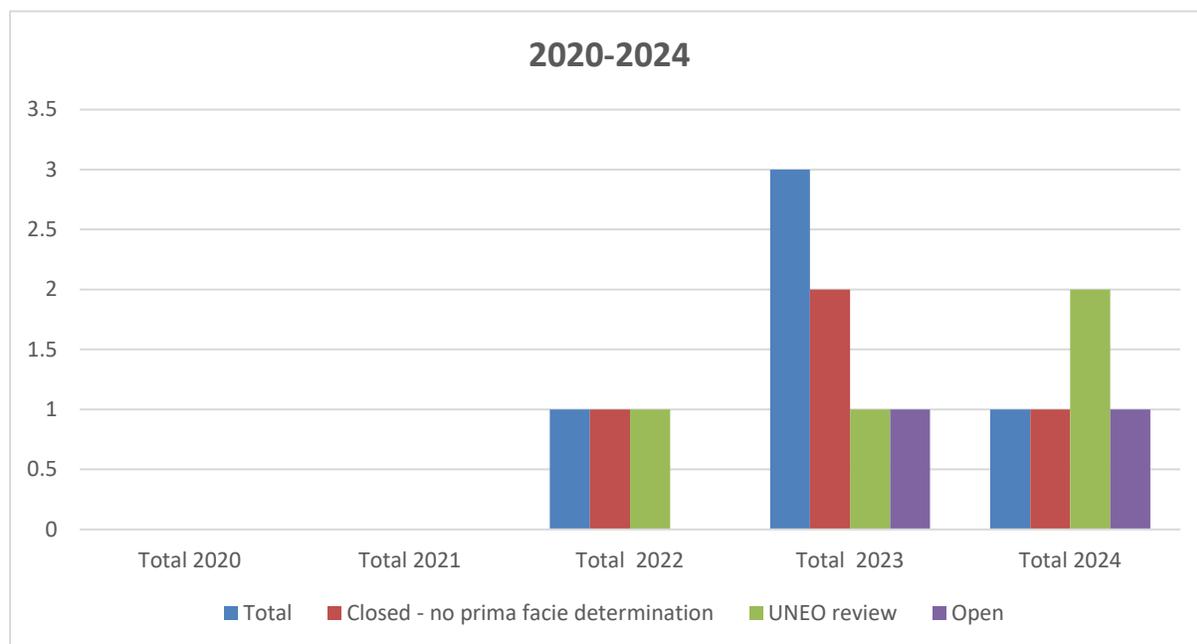
	<b><u>Sept. – Dec. 2020</u></b>	<b><u>Total 2021</u></b>	<b><u>Total 2022</u></b>	<b><u>Total 2023</u></b>	<b><u>Total 2024</u></b>
Total	33	89	49	39	48
<i>Ex Officio</i>	5	13	15	13	5

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APPENDIX C

**Requests for protection against retaliation**



	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
Total	0	0	1	3	1
Closed	0	0	1	2	1
UNEO review	0	0	1 <sup>20</sup>	1 <sup>21</sup>	2 <sup>22</sup>
Open	0	0	0	1 <sup>23</sup>	1 <sup>24</sup>

— END —

<sup>20</sup> Concurrence with the no *prima facie* determination of the ICAO Ethics Advisor and closed.

<sup>21</sup> Concurrence with the no *prima facie* determination of the ICAO Ethics Advisor and closed.

<sup>22</sup> The first matter referred to a case submitted in 2023, where the UNEO concurred with the ICAO Ethics Advisor's no *prima facie* determination, and the case was closed. In the second case, the UNEO recommended to refer the matter for investigation.

<sup>23</sup> Pending information from the complainant.

<sup>24</sup> Pending information from the complainant.