



WORKING PAPER

COUNCIL — 237TH SESSION

Subject No. 20: Periodic reports by the Secretary General

ANNUAL REPORT OF THE ETHICS OFFICE FOR 2025

(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 2025.

The Secretary General transmits herewith to the Council the Annual Report of the Ethics Office for 2025, 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 of the Ethics Office, as well as for the recommended actions included in paragraphs 4.2, 4.3 and 4.4 of this report; and
- b) request that the allocation of adequate resources to the Ethics Office be duly considered, taking into account the situations described in paragraphs 3.13, 3.20 and 4.1 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>	The ICAO Service Code C-DEC 193/6 C-DEC 235/9 C-WP/15474 C-WP/15564 C-WP/15681 C-WP/15782 JIU/REP/2017/9 JIU/REP/2021/5

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 2025.

1.2 Led by the Ethics Advisor, 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 (EAAC), the External Auditor, the investigative entity, and the external ethics entity.

1.3 The Ethics Office operates on the principles of independence, impartiality, and confidentiality. All its activities are designed to foster and promote a culture of ethics, integrity, accountability, transparency, and respect within ICAO. In this context, the Office provides confidential advice and guidance on ethical issues, challenges and dilemmas to both management and staff, regardless of contract type or duration. It also supports the Secretary General and the Council in cultivating a strong organizational culture of ethical behaviour and sound decision-making, whereby ICAO management and staff perform their duties in accordance with the highest standards of conduct and feel empowered to speak up without fear of retaliation. Furthermore, the Office serves as a key advocate for ICAO’s principles and values, including through awareness and outreach initiatives, thereby strengthening trust in and enhancing the reputation of the Organization 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 2025

3.1 **Advice and guidance:** Providing confidential advice and guidance is a core responsibility of the Ethics Office and a critical element in ICAO’s efforts to uphold ethical standards and foster a strong organizational culture built on integrity. By providing impartial, consistent, actionable, and timely guidance, the Ethics Office supports ICAO personnel and management in making informed and appropriate decisions—both personal and professional—in the best interests of the

Organization. This advisory function also helps staff to identify and address actual, potential, or perceived conflicts of interest, as well as other ethical issues and dilemmas or sensitive workplace situations, before they escalate into more serious concerns. Acting as a trusted consultative resource, the Ethics Office also plays a key role in risk management by promoting ongoing awareness and adherence to applicable policies, rules, and standards of conduct, thereby fostering a trustworthy, healthy, and ethical working environment

3.2 In 2025, the Ethics Office provided confidential advice and guidance on various issues through in-person and virtual meetings or in writing. The Office received 278 requests for advice and guidance, which is more than an 18% increase compared to the number of similar requests received in 2024. This included 137 requests categorized as “Management” (queries by members of ICAO personnel in their official capacity), 132 as “Individual” (queries more personal in nature), and 9 as “External” (queries from outside ICAO). In terms of subject matter, the Office registered 71 requests involving outside activities¹, 55 standards of conduct, 51 administrative-related activities, 33 conflicts of interest, 29 gifts, 20 misconduct/wrongdoing², and 19 the ICAO financial disclosure programme (for further details see Appendix A).

3.3 The Ethics Office observed with particular attention a substantial increase in overall requests, particularly those related to misconduct/wrongdoing—more than double compared to 2024—along with a considerable number of cases involving standards of conduct, which account for nearly one-fifth of all requests. The Office also noted that inquiries concerning outside activities and gifts nearly doubled from the previous year. These trends will be explored further in paragraphs 4.2 and 4.3 below, along with recommendations from the Ethics Office.

3.4 **Standard-setting and policy support:** Promoting a culture of ethics, transparency, and accountability within international organizations demands frequent and consistent advocacy. 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, helping to ensure that ICAO’s policies, rules, procedures, and practices consistently reflect, reinforce, and promote ethical standards and institutional integrity.

3.5 During the reporting period, the Ethics Office provided inputs on 41 standard-setting and policy matters, 10 of which were proactively submitted *ex officio* by the Office. These matters covered a range of topics, including, but not limited to, the delegation of authorities, establishment of an ICAO Global Ambassadors Programme, information security, interactions with external parties, the creation of a Strategic Portfolio Management Office, contracts of individual consultants and contractors, and the draft Strategy to Prevent and Respond to Sexual Misconduct. The Office also actively participated in the revision of the *Consolidated Policies for Field Service Staff* employed by ICAO to support the mandate of the Capacity Development and Implementation (CDI) Bureau, as well as the Terms of Reference for the Senior Management Board, financial rules, and Personnel Instructions. In addition, the Ethics Office recommended the endorsement of the *Standards of Practice for Ethics Functions*, approved by the Ethics Network of Multilateral Organizations (ENMO) in April 2025, with the aim of harmonizing practices among member organizations to the extent possible.

3.6 The Office also contributed to the establishment of a network of volunteer Trustful Workplace Ambassadors (TWAs), overseen by the Ombudsperson, which will act as a complementary, confidential and neutral, informal resource that provides ICAO personnel with a safe place to discuss workplace concerns and conflicts, and to explore relevant options and processes before they decide on how to proceed. Additionally, TWAs support the Ombudsperson and Ethics Office with education and

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

² 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.

outreach initiatives to help cultivate and nurture a strong organizational conflict competency and foster an ethical, respectful, harmonious and trust-based workplace culture.

3.7 The Ethics Advisor provided technical advice during discussions on the development of a Code of Conduct for the staff of Delegations to ICAO, which supported the process leading to the ICAO Council's approval of the *Code of Conduct for the prevention of harassment, including sexual harassment* (C-DEC 235/9). The Ethics Advisor also participated in the work of the Inter-Office Advisory Group (IOAG), a body composed of senior-level offices that exchange information and promote the prevention of workplace conflict and abusive conduct through targeted advice to the Secretary General and senior leadership. In this context, in 2025, the IOAG developed and disseminated a new important resource, *ICAO Workplace Compass: Where to Go*, which provides ICAO personnel with an overview of available options when navigating workplace concerns, questions, or conflicts.

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 policy aims to strengthen accountability and ensure that staff can speak up without fear of retaliation, thereby fostering a culture of integrity and trust within the Organization.

3.9 In 2025, the Ethics Advisor reviewed and provided preliminary confidential advice on four cases of perceived retaliation. He also received one formal request for protection against retaliation, which is pending additional information from the concerned personnel. During the reporting period, and in line with the *Agreement between the United Nations and the International Civil Aviation Organization on the Provision of Services to the International Civil Aviation Organization by the United Nations Ethics Office (UNEO)*, the UNEO made a final determination on a request for protection against retaliation. This followed a 2024 independent review by the UNEO of an ICAO "no *prima facie*" determination, which UNEO overturned. In this case, retaliation was established, and remedial measures were recommended to the ICAO Secretary General by the UNEO.

3.10 **Training, education and outreach:** Training, outreach, and awareness-raising initiatives are fundamental to ensuring ICAO personnel understand and uphold the Organization's standards of conduct. These initiatives form a core component of the Ethics Office's mandate and focus on building knowledge and skills related to ICAO's principles, values, and standards.

3.11 Throughout the reporting period, the Ethics Office developed and implemented a range of education and outreach activities aimed at supporting personnel act in the best interests of the Organization and safeguard its reputation. However, the Office's capacity to satisfactorily deliver on its mandate in this area was adversely affected by the fact that the carry-over funds allocated to the Ethics Office in 2025 were nearly 75% lower than those provided in 2024 and prior years, along with other contributing factors. Consequently, the Office was obliged to prioritize tasks across its various areas of responsibility. Under these circumstances, it was not possible to propose the launch of the Annual Leadership Dialogue, and in August, the Office was also obliged to pause the issuance of monthly ethical awareness messages as well as the organization of outreach initiatives on ICAO principles, values, and standards of conduct.

3.12 At the same time, in 2025, the Ethics Office finalized its three-year plan for the development and rollout of ten mandatory online training courses on key ethical matters. Specifically, under a contract between ICAO and the United Nations System Staff College (UNSSC), and in coordination with other ICAO services where necessary, the Office developed and launched three courses: *Conflicts of Interest for Managers and Supervisors*, *Prevention of Sexual Exploitation and Abuse for ICAO Personnel*, and *Prevention of Sexual Harassment for Managers and Supervisors*.

3.13 The Ethics Office considers it important for the Organization to continue developing at least one new training course per year during the current triennial budget period (2026–2028), to ensure that personnel and managers remain equipped with the knowledge and tools necessary to uphold the

highest standards of integrity and professional conduct. Since the Ethics Office lacks the necessary resources to achieve this objective, it would be important for the Organization to promptly identify and allocate the required funds. Furthermore, considering that the ten existing training courses are designed to remain valid for three years, the Organization should establish appropriate measures to ensure continued compliance, including requiring staff to retake these courses once their validity expires, or alternatively, secure additional resources to develop shorter refresher courses for each of the topics covered.

3.14 During the reporting period, 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.

3.15 In coordination with other members of the IOAG, the Ethics Office engaged in outreach initiatives related to the above-referenced Council's approval of a *Code of Conduct for the prevention of harassment, including sexual harassment*. These initiatives included the dissemination of roller banners and electronic messages in all official languages within ICAO Headquarters, particularly in the context of the 42nd Assembly, as well as the issuance of a message to all staff emphasizing the importance of upholding ICAO principles, values, and standards of conduct during the Assembly and associated events. The Ethics Office also provided logistical support for the organization of the Assembly by assigning a consultant for the duration of the event.

3.16 Further, together with the Office of Internal Oversight, the Bureau of Administration and Services (Specialist, Administrative Law, Policy, and Disciplinary Matters), and the Ombudsperson, the Ethics Office organized ICAO's second 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 for ICAO personnel as well as the sensibilization of relevant ICAO stakeholders, such as suppliers, vendors, business partners, and sponsors.

3.17 During the reporting period, the Ethics Advisor visited the South American (SAM) and Asia and Pacific (APAC) Regional Offices, as well as the APAC Regional Sub-Office (APAC RSO). Outputs of the visits included workshops for staff and confidential consultations with staff and Regional Directors. The Ethics Advisor also held introductory meetings with the newly appointed Council State representatives and delivered onboarding sessions for new personnel.

3.18 **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 personnel³ 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.

3.19 Due to the above-mentioned need to prioritize tasks and the constraints on available resources, the Office was obliged to delay the launch of the 2025 FDP programme. Notwithstanding these challenges, the Office successfully updated the FDP forms, making them more effective and user-

³ 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; e) all staff members, consultants, and secondees whose duties relate to the investment of the assets of ICAO; and f) all ICAO staff members and non-staff personnel, whether full- or part-time—including, but not limited to, seconded personnel (e.g., secondees, gratis personnel, Junior Professional Officers, Associate Experts), consultants, experts, and interns—who are involved in the due diligence process established under the ICAO *Policy on Interaction with External Parties*.

friendly, and subsequently launched, administered, and finalized the FDP, achieving 100% compliance among 265 participants, including the President of the Council and Secretary General (for details, see Appendix D). During the verification phase, individuals and supervisors were contacted when necessary and advised on appropriate avoiding or mitigating actions. The exercise was ultimately completed with no cases of conflicts of interest requiring reporting or further 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.

3.20 To support the implementation of pending recommendations from the Joint Inspection Unit (JIU) and the EAAC⁴, in 2025 the Ethics Office maintained engagement with relevant ICAO stakeholders to explore and refine options for developing 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. Among the options considered was the replication of systems already implemented by other United Nations entities. However, even when leveraging existing ICAO resources and capabilities, costs will be incurred for development, staffing, and ensuring the security of the proposed system. Technical expertise will also be required, particularly in areas such as system architecture, cybersecurity, and integration with existing ICAO platforms. Given that the Ethics Office's limited budget does not include resources for these requirements, its further participation in the implementation of the above recommendations will be contingent upon the availability of adequate financial support and the active involvement of management and relevant stakeholders.

3.21 **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 2025, 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. He also served as a member of the ENMO Working Group on Ethics, Artificial Intelligence, and Innovative Technologies, and contributed to the development of the *Standards of Practice of the Ethics Function*. The Ethics Advisor also actively participated in the 17th Annual Conference of ENMO, which focused, *inter alia*, on the handling of ethical matters involving senior management and governing officials; artificial intelligence in ethics, organizational versus individual Ethics; and ethics and social media (neutrality and loyalty versus freedom of expression). Finally, the Ethics Advisor engaged in bilateral relations with the ethics offices of other International Organizations.

4. OBSERVATIONS AND CONCLUSION

4.1 In terms of available resources under the ICAO Regular Programme Budget for 2025, the situation of the Ethics Office remained significantly constrained, consistent with what was reported in previous annual reports. Furthermore, as reported to the Council during its Sixth Meeting of the 234th Session on 17 March 2025, the carry-over funds allocated to the Ethics Office in 2025 were approximately 75% lower than those provided in 2024 and prior years. Following this development, one temporary consultant resigned, and a second left shortly thereafter. As a result, for several months, the Ethics Advisor alone was responsible for the full range of substantive, managerial, technical, and administrative tasks required to implement the Office's mandate. This situation, along with the increase in requests for advice and guidance, had a detrimental impact on the Office's ability to effectively and promptly fulfill all areas of its mandate, necessitating further prioritization of tasks across its areas of responsibility, at the expense of certain outreach and FDP activities, as noted above. Using funds that became available as a result of personnel resignations and additional resources allocated by the Secretary General in November, the Office was eventually able to recruit two temporary consultants to support administrative, and awareness-raising initiatives. It is also noted that the new ICAO triennial Regular Programme Budget now includes some funds for consultancy services for the Ethics Office. While this development is welcomed as a positive step and expected to partially address concerns related to the need for administrative services by the Office, these funds are unlikely to be sufficient to address

⁴ See recommendation 3 of the JIU report on *Review of mechanisms and policies addressing conflict of interest in the United Nations system* (JIU/REP/2017/9); recommendation 4 of the JIU report on *Review of the ethics function in the United Nations* (JIU/REP/2021/5), and the Appendix C to the latest EAAC Annual Report (C-WP/15782).

the resource constraints anticipated for the period 2026–2028. Consequently, the Office will still need to rely on exceptional funding from the limited carry-over budget or other available sources to ensure continuity in fulfilling its mandate. In this context, the Ethics Office regrets to note that, for the third consecutive year, no nominations were submitted by any Government in response to the State letter issued in December 2022 regarding the Junior Professional Officer opportunity for the position of Associate Ethics Officer.

4.2 With regard to promoting ethical standards and institutional integrity, the Ethics Office welcomes as a significant positive development the above-mentioned establishment of a network of volunteer Trustful Workplace Ambassadors (TWAs), overseen by the Ombudsperson, as well as the various initiatives implemented by the Inter-Office Advisory Group. It also considers a notable advancement ICAO's decision to amend its internal administration of justice, granting staff members, effective 1 January 2026, access to the United Nations Common System's administrative justice mechanisms, including the United Nations Dispute Tribunal (UNDT), and professional legal support from the United Nations Office of Staff Legal Assistance (OSLA). At the same time, as noted above, the analysis of emerging trends related to requests for advice and guidance received by the Ethics Office in 2025 indicates a considerable number of cases involving allegations of misconduct and wrongdoing, as well as matters related to standards of conduct. This trend is concerning, as many of these cases involve managers and supervisors, including at senior levels—either due to inaction or, in some instances, as individuals implicated in the allegations. While these officials have a duty to promote and maintain a safe and harmonious work environment and should be approachable to ensure effective and timely intervention⁵, some are perceived by staff as dismissive or disengaged when concerns are raised, and, in certain instances, as exhibiting limited regard for established rules during official meetings or statements. For this reason, the Ethics Office reaffirms its recommendation to strengthen provisions on the roles and responsibilities of Directors, managers, and supervisors, ensuring clarity that they serve as the first line of defence for addressing workplace concerns, while underscoring *tone at the top* as a cornerstone of ethical leadership. As a general principle, the involvement of independent and neutral offices—such as the Ombudsperson or the Ethics Office—in dispute resolution should remain a residual option, to be considered only when initiatives within reporting lines are deemed to be ineffective, inappropriate or unsuitable⁶.

4.3 Based on the above-referenced trends in requests for advice and guidance received in 2025, the Ethics Office supports the EAAC's recommendation to review ICAO's existing regulatory framework on outside activities⁷ and emphasizes the need to establish clear rules and procedures for the acceptance and handling of gifts, favours, hospitality, honours, decorations, or remuneration from external sources to prevent conflicts of interest and uphold transparency. At the same time, the Ethics Office notes that, during the reporting period, limited progress appears to have been made in addressing the different issues highlighted in its previous annual report concerning the *Administrative Instructions on Interactions with External Parties* issued in November 2024. Although no major issues were reported during implementation, these concerns remain pertinent as they relate to ongoing risk exposures and potential vulnerabilities within the control environment, warranting governance attention to ensure alignment with ICAO's risk appetite and ethical standards. For this reason, the Ethics Office highlights the need for appropriate prioritization of this matter and timely action to address the identified concerns⁸.

4.4 The Office noted that, in order to align ICAO with United Nations best practices in fostering an ethical, respectful, harmonious, and trust-based workplace culture, progress was made in 2025 toward developing an internal strategy to prevent and respond to sexual misconduct. In this regard, the Ethics Office supports and encourages its timely finalization. It also recommends that the Organization enhance its victim-centred approach by reviewing its internal regulatory framework to

⁵ Paragraphs 31 and 92 of the ICAO Ethics Framework refer.

⁶ See also paragraph 4.3 of C-WP/15474, 4.2 of C-WP/15564, and 42 of C-WP/15681.

⁷ See Appendix B of the above-referenced C-WP/15782. Similar recommendations were also included in past annual reports of the Ethics Office.

⁸ See paragraph 4.4 of C-WP/15681, where, among other things it was stressed that in the view of the Ethics Office such document lacked references to effective and adequate tools, as well as clear assessment criteria needed by those responsible for the due diligence and risk assessment phases.

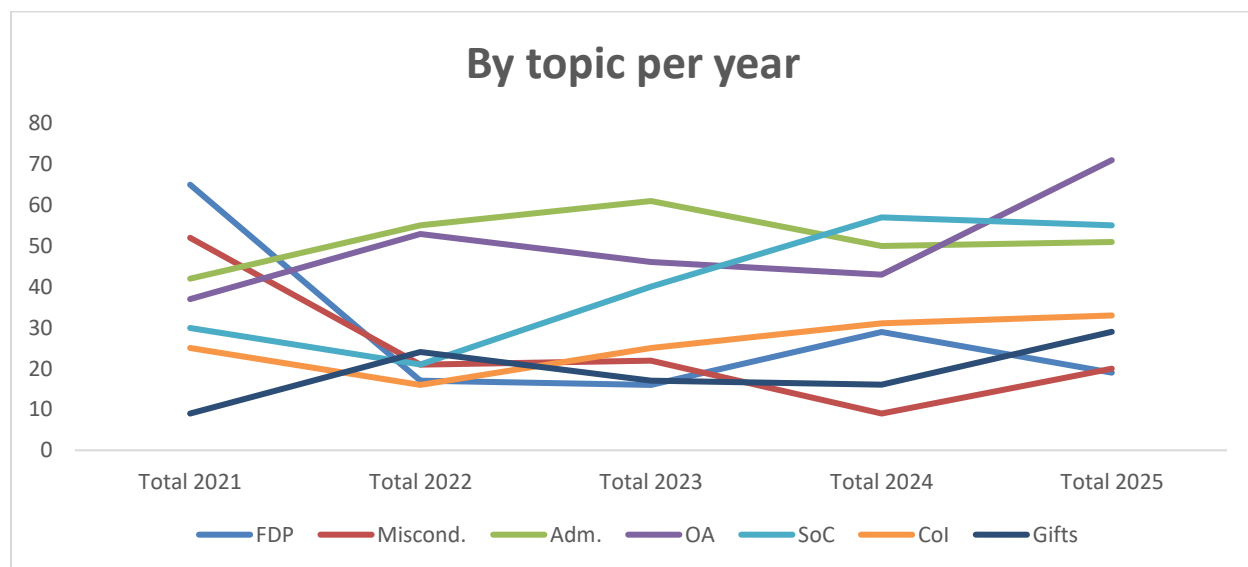
ensure that complainants of misconduct are properly informed of the outcome of their allegations and the associated processes⁹.

4.5 The Ethics Office considers the above-referenced Council's approval of the *Code of Conduct for the prevention of harassment, including sexual harassment*, an important and commendable milestone, marking a significant step toward strengthening ethical standards and fostering a respectful environment within ICAO. It is also noted that the Council decided to adopt a two-phased approach and to invited the Committee on Governance (COG) to continue exploring options for a Code of Conduct for Delegation staff to ICAO with a view to providing guidance on recommended standards of behavior, including interactions between Delegations and the ICAO Secretariat, and to present a proposal to the Council at a future session (C-DEC 235/9). In this regard, the Ethics Office wishes to confirm its readiness to provide technical advice and support in connection with this further initiative, should it be considered helpful.

⁹ While the existing ICAO regulatory framework does not explicitly address this specific requirement, paragraph 6.6 of Personnel instruction PI 1.3 on *Prevention of sexual harassment* provides that “[t]he affected individual shall be informed as appropriate of the status of any investigation and outcome of the report. The provision of any such information shall respect the regulations and rules on confidentiality as applicable to the alleged offender and to the affected individuals.” Also, paragraphs 76 and 78 of the Framework on Ethics on protection against retaliation (a form of misconduct) specify that after that retaliation has been established “[t]he Secretary General will provide a written decision on the recommendations of the Ethics Advisor to the complainant [...] within 30 calendar days” and that “[c]omplainants will be informed on a confidential basis of any disciplinary sanctions imposed for the retaliatory action.” Similarly, paragraphs 25 of the Appendices G and H of the *Rules of Procedure of the Council* provide that—after the Council decides on appropriate and proportionate action following an investigation into allegations of misconduct or retaliation against the President of the Council or the Secretary General—the complainant will be informed of the “outcome”. As per the United Nations (UN) system coherence, reference is made to the [Investigators' Manual on Investigation of Sexual Harassment Complaints in the United Nations](#) issued by the UN Chief Executives Board in 2021, which, *inter alia*, includes in Annex C relevant decisions on this topic issued by the UN and International Labour Organization administrative tribunals as well as considerations from the UN Office of Legal Affairs.

APPENDIX A

Advice and Guidance¹⁰



<u>Topic</u>	<u>Total 2021</u>	<u>Total 2022</u>	<u>Total 2023</u>	<u>Total 2024</u>	<u>Total 2025</u>
<i>FDP</i>	65 ¹¹	17	16	29	19
<i>Miscond.</i>	52 ¹²	21 ¹³	22	9 ¹⁴	20 ¹⁵
<i>Adm.</i>	42	55	61	50	51
<i>OA</i>	37	53	46	43	71
<i>SoC</i>	30	21	40	57	55
<i>Col</i>	25	16	25	31	33
<i>Gifts</i>	9	24	17	16	29
<u>Total</u>	260	207	227	235	278

¹⁰ 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 “Col” for “conflicts of interest”.

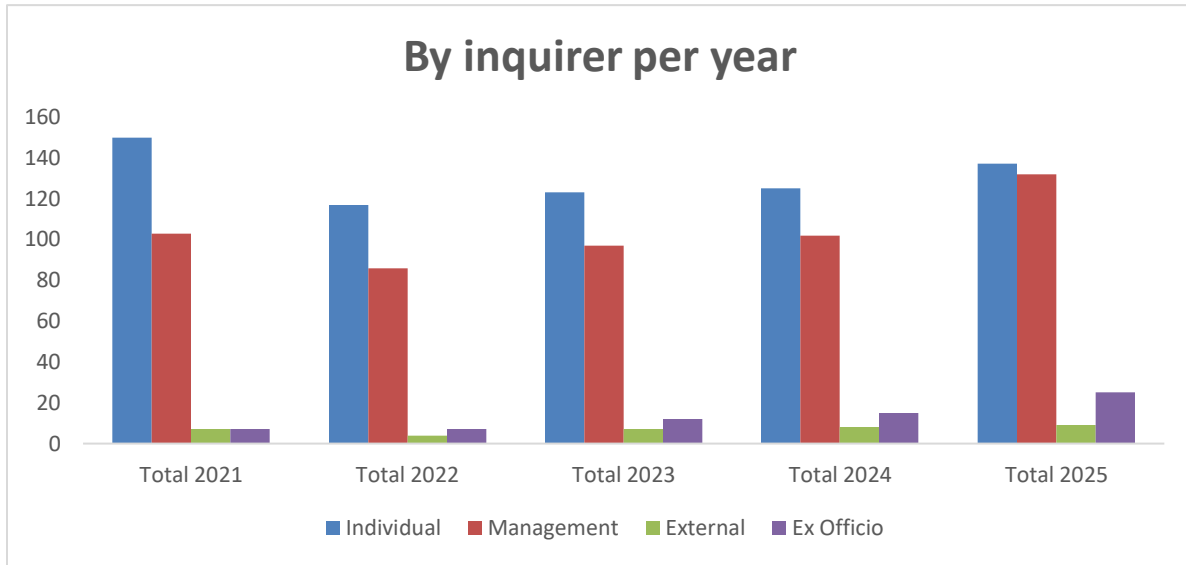
¹¹ It is worth noting that in 2021 the Ethics Office led two separate FDP paper-based exercises and numerous staff expressed concerns and difficulties in submitting the necessary documentation during a pandemic.

¹² This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.

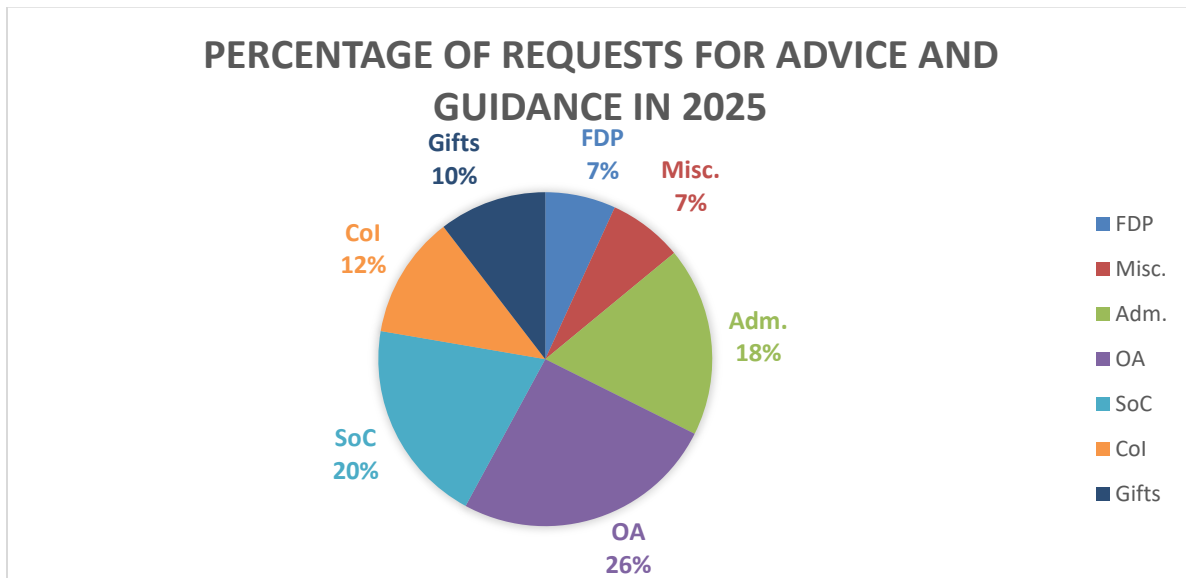
¹³ This includes the provision of preliminary advice on 5 cases of potential/perceived retaliation, and 3 cases of wrongdoing.

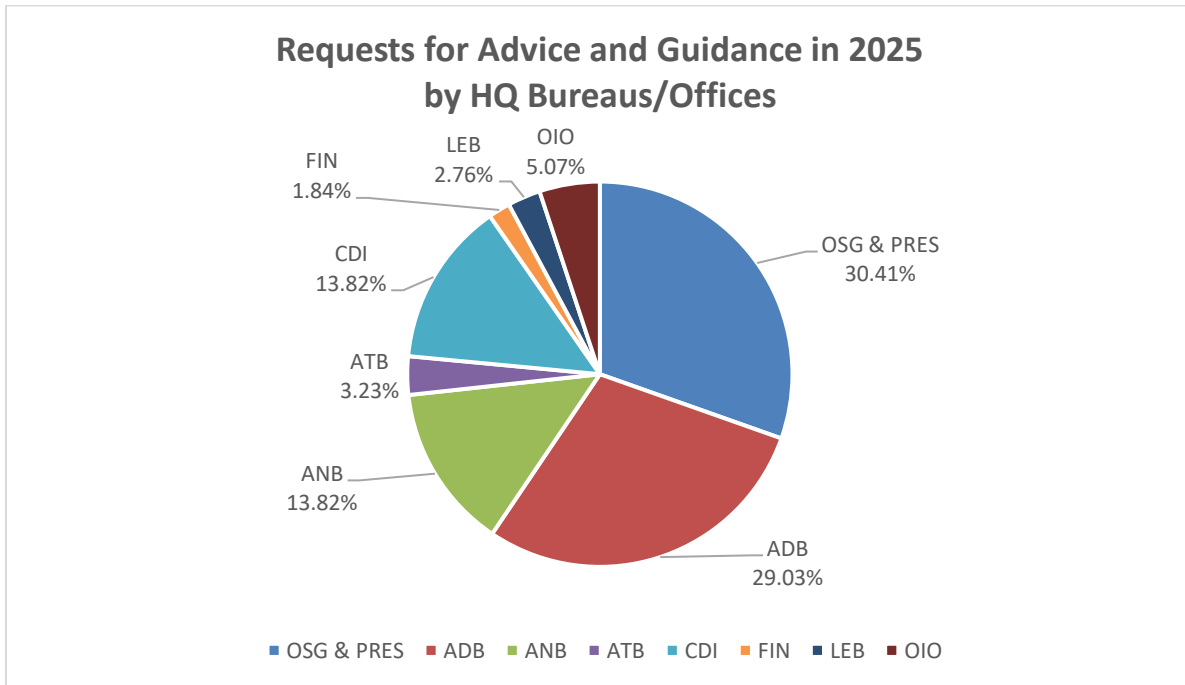
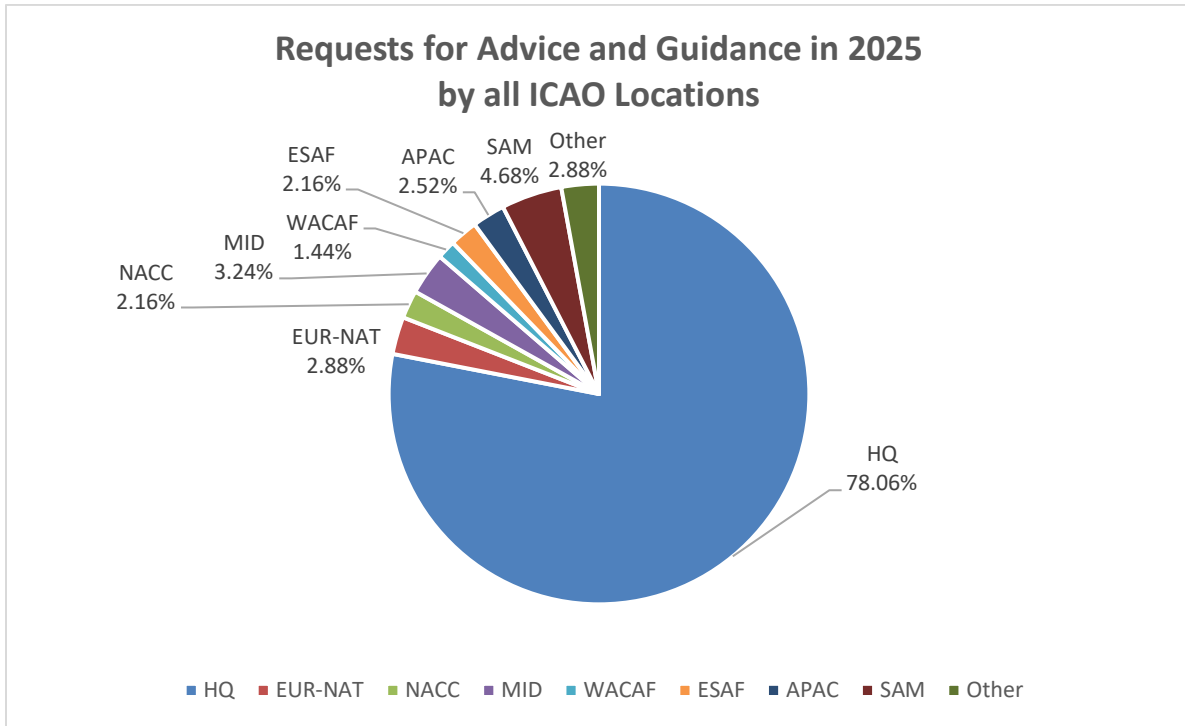
¹⁴ This includes the provision of preliminary advice on 1 case of potential/perceived retaliation

¹⁵ This includes the provision of preliminary advice on 4 cases of potential/perceived retaliation, and 3 cases of wrongdoing.



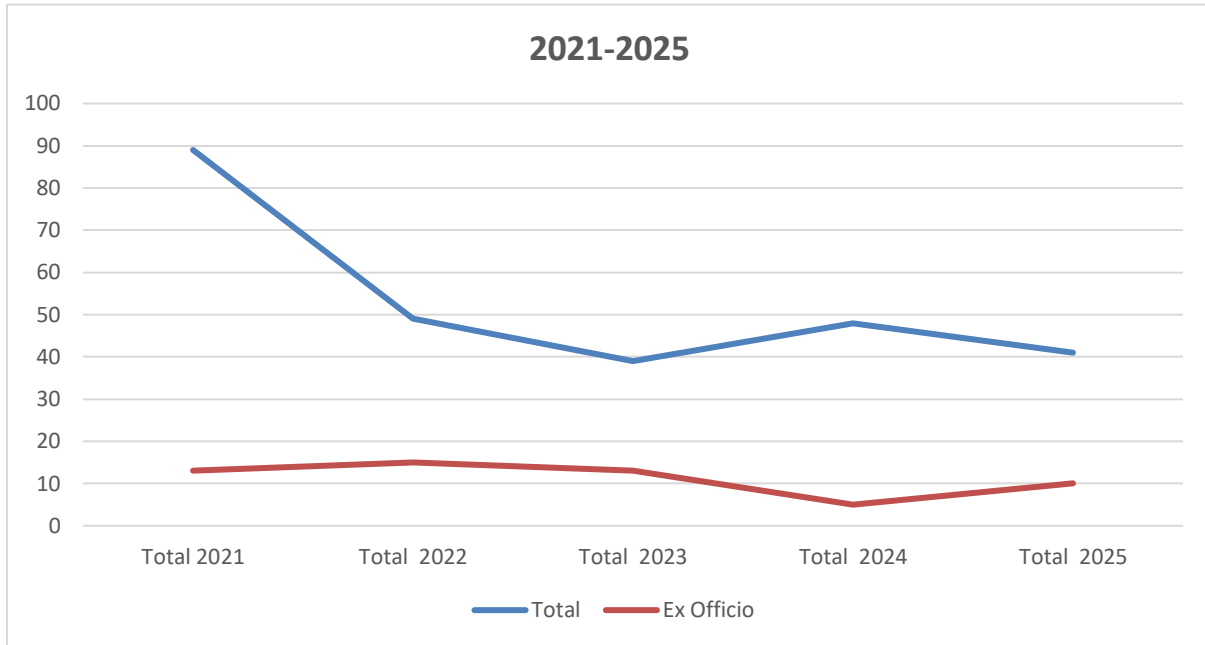
	Total 2021	Total 2022	Total 2023	Total 2024	Total 2025
<i>Individual</i>	150	117	123	125	137
<i>Management</i>	103	86	97	102	132
<i>External</i>	7	4	7	8	9
Total	260	207	227	235	278
<i>Ex Officio</i>	7	7	12	15	25





APPENDIX B

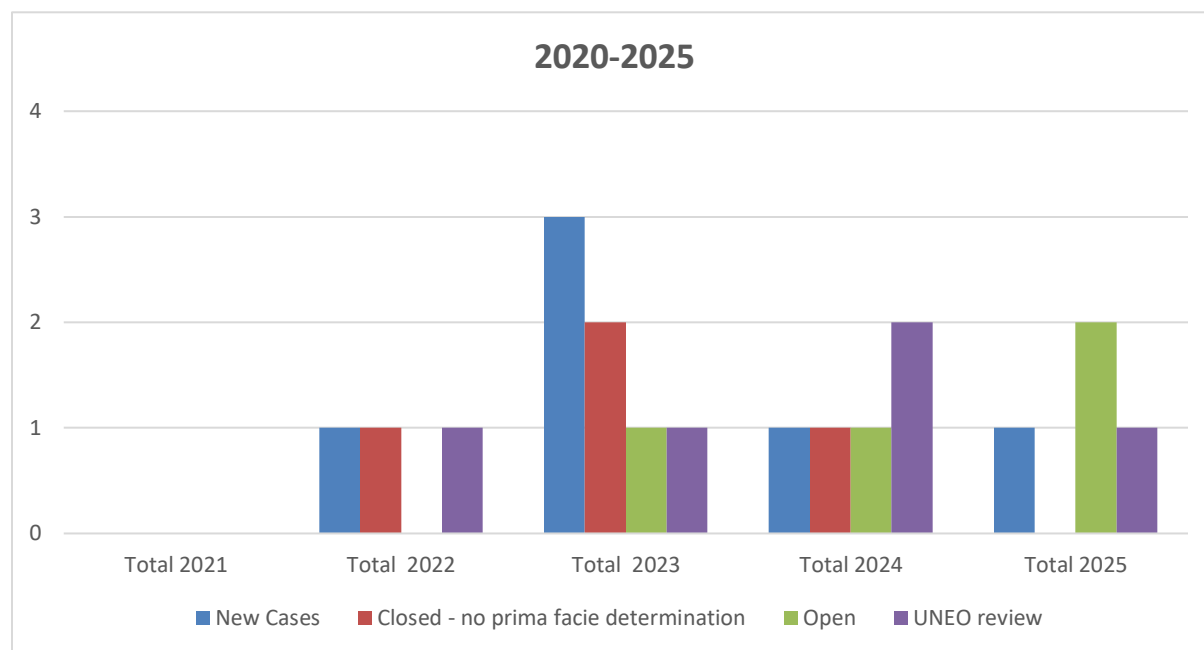
Standard-setting and Policy Support



	<u>Total 2021</u>	<u>Total 2022</u>	<u>Total 2023</u>	<u>Total 2024</u>	<u>Total 2025</u>
Total	89	49	39	48	41
<i>Ex Officio</i>	13	15	13	5	10

APPENDIX C

Requests for Protection against Retaliation



	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>
New cases	0	1	3	1	1
Closed	0	1	2	1	0
Open	0	0	1 ¹⁶	1 ¹⁷	2 ¹⁸
UNEO review	0	1 ¹⁹	1 ²⁰	2 ²¹	1 ²²

¹⁶ Pending additional information from the complainant.

¹⁷ Pending additional information from the complainant.

¹⁸ Both cases are pending additional information from the respective complainants.

¹⁹ Concurrence with the *no prima facie* determination of the ICAO Ethics Advisor, and the case was closed.

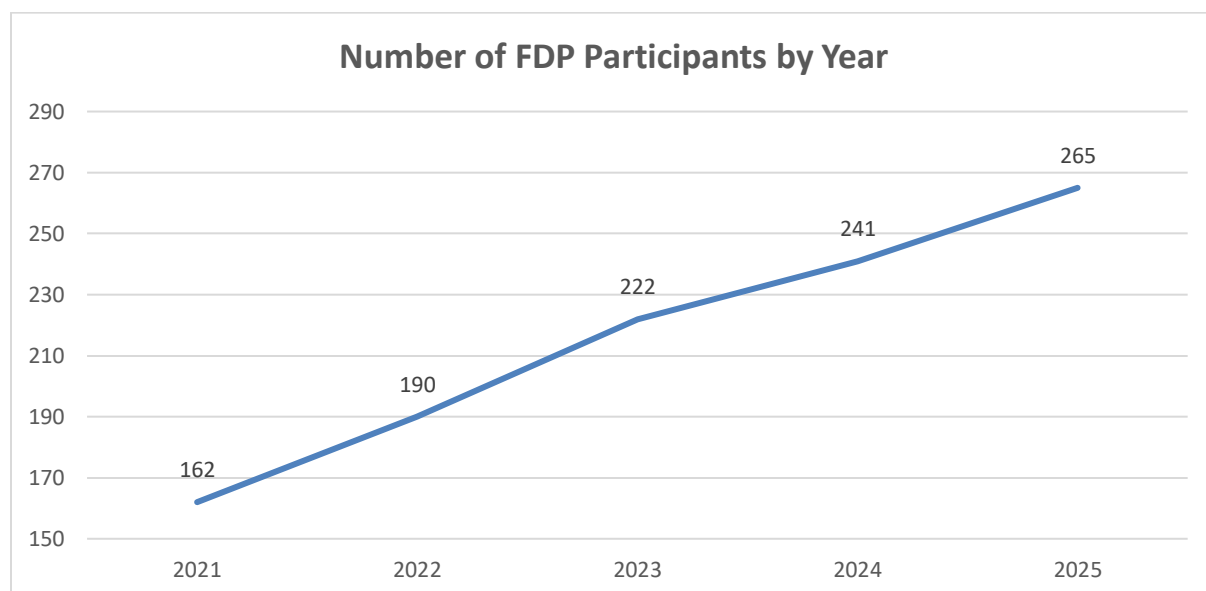
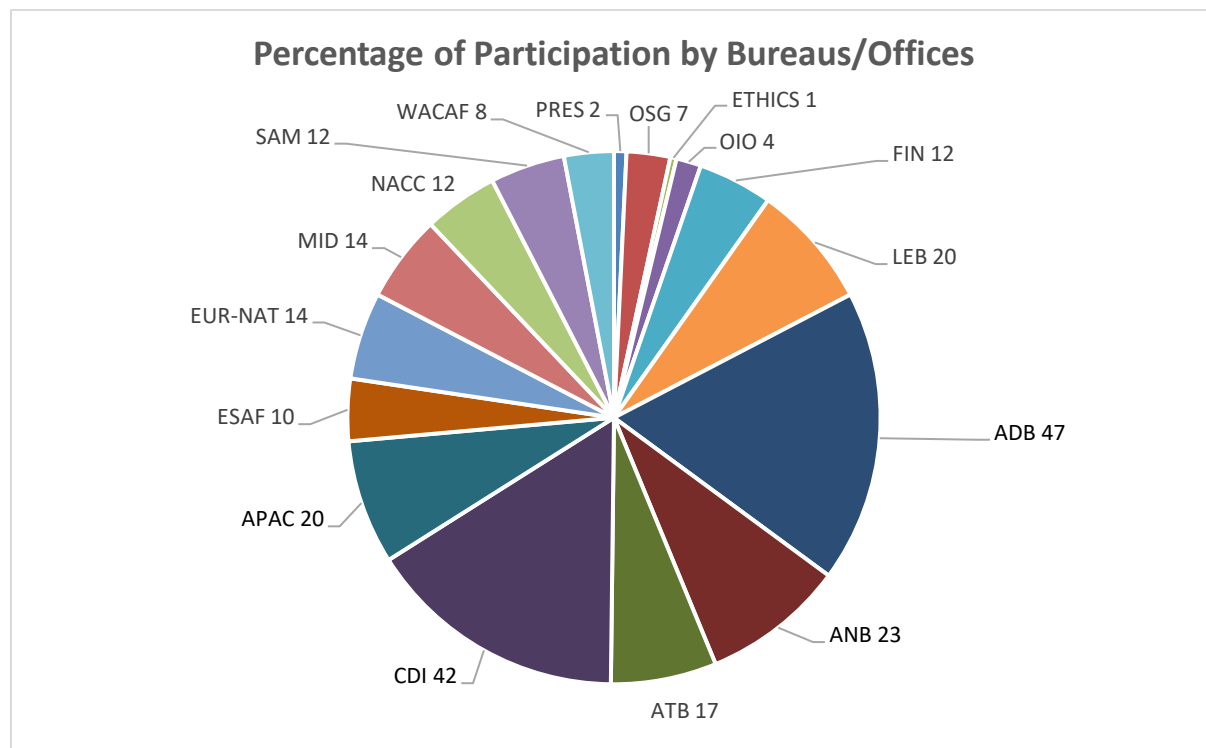
²⁰ Concurrence with the *no prima facie* determination of the ICAO Ethics Advisor, and the case was closed.

²¹ 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.

²² In this case, retaliation was established, and remedial measures were recommended to the ICAO Secretary General.

APPENDIX D

Financial Disclosure Programme



— END —