



Inter-American Institute for  
Cooperation on Agriculture

# Policy for the Processing of Reports and the Protection of Whistleblowers and Witnesses

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## ARTICLE I. Definitions

For the purposes of this Policy, the following terms are defined as follows:

“Clear and convincing evidence” is evidence that shows that it is highly probable that an alleged fact is true.

“Complaint” is an expression or manifestation of nonconformity with someone or something.

“Complainant” is the person who files a complaint against another person. Synonym of claimant.

“Conflict of Interest” is any situation in which a party or any of its personnel involved in the relevant decision-making process has interests that could, or could be perceived to, improperly influence the performance of official duties or responsibilities, contractual obligations, or compliance with applicable laws and regulations;

“Counterparty” is any party that contributes to, executes, implements, or in any way participates in IICA-related Activities, including receiving a grant, loan, or other form of financing or support from the Institute. Counterparties include a contributor, Accredited Entity, Direct Access Entity, Executing Entity, delivery partner, fiscal agent, financial intermediary, vendor, and others;

“Covered Individual” means IICA’s Personnel as defined below;

“EC” means Ethics Commission constituted by IICA’s Director General under Article III(A) of IICA’s Code of Ethics.

“Evidence” means any physical object, record, document in any form, testimony, or other information that tends to establish the existence or non-existence of an allegation or fact;

“External Party” [ or "Member" ] means any person or entity other than a Covered Individual who contributes to, engages in, or is affected by or concerned with any IICA-related Activity. An External Party may be an individual or an entity, and may include Counterparties;

“External Whistleblowers and Witnesses” are External Parties who are Whistleblowers or Witnesses, as defined in this Policy;

“False or Malicious Report” means an inaccurate or misleading report that is made recklessly, or knowingly or deliberately for the purpose of gaining unmerited personal advantage or causing harm to a person or entity;

“Grievance Redress Mechanism” is a mechanism that addresses complaints and reports filed by persons or stakeholders, always in keeping with human rights.



“IICA-related Activity” means any activity which is financed, administered, or supported by the Institute, either with its own resources or those of others, or any activity that materially affects or may affect or otherwise be relevant to the Institute;

“IICA’s Personnel” means any Staff Member and any other individual contracted and/or engaged by the Institute to perform official functions for IICA, IICA interns, and volunteers.

“Independent contractors” are the individuals and/or legal entities related to the Institute through a contract.

“Prohibited Practices” is specific conduct as defined in the relevant IICA’s principles and policies. Prohibited Practices include Corrupt Practices, Fraudulent Practices, Coercive Practices, Collusive Practices, Obstructive Practices, such as Abuse, Retaliation against Whistleblowers or Witnesses, Money Laundering, and Financing of Terrorism.

“Malice” means “having no other intent other than to cause harm or gain unmerited personal advantage” or “having reckless disregard for the truth.”

“Reporting” is to notify the competent authorities of an illicit act or unusual event through a channel established to this end.

“Reporting [or “report” or “reported”] in good faith” means reporting what a similarly situated reasonable adult person reasonably believes to be true based on facts known to him/her.

“Misconduct” means conduct which violates applicable law and/or the policies, rules and regulations duly adopted by the Institute.

“Reasonable” means what a reasonable adult person would consider reasonable under the same or similar circumstances.

“Retaliation against Whistleblowers or Witnesses” means any detrimental act, direct or indirect, recommended, threatened, or taken against a Whistleblower or Witness, or person associated with a Whistleblower or Witness, because of his or her report of suspected Wrongdoing or cooperation with an Institute investigation; however, it does not include a sanction against any Whistleblower for making a False or Malicious Report in bad faith, or for other misconduct as specified in Article II (F) and Article III(B) below.

“Subject of an Investigation” means a person who is suspected to have condoned, encouraged, participated, or engaged in any Wrongdoing directly or by proxy.

“Staff Members” means all persons appointed to a post in IICA, by way of a letter of appointment (individually, a “Staff Member”).

“Whistleblower” is any person or entity, who, in good faith and on reasonable grounds, reports, attempts to report, is believed to be about to report, or is believed to have reported suspected Wrongdoing (including concerns of suspected Wrongdoing);

“Witness” means any person or entity who cooperates in good faith, or is believed to be about to cooperate, or is believed to have cooperated with an investigation and provided information or evidence.

“Wrongdoing” means conduct that violates IICA’s policies or which involves significant risk to the Institute, because it is harmful to its interests, reputation, operations, or governance. Wrongdoing includes but is not limited to Misconduct, Prohibited Practices, and Conflicts of Interest.

## ARTICLE II. General Principles

The Inter-American Institute for Cooperation on Agriculture (IICA) is committed to ensuring transparency in management and openness to dialogue. In this capacity, it shall establish channels and mechanisms, through which reports and claims regarding the prevention, detection and management of behaviors and situations perceived as irregular can be submitted, as well as comments associated with potential acts of corruption or actual corruption.

Through this Policy, the Institute sets forth guidelines aimed at providing a space for consultation and identification of joint solutions on issues of interest, and at addressing the concerns of communities and individuals, directly or indirectly related to the activities developed by IICA or its projects, by ensuring an adequate, fair and respectful treatment of reports or complaints submitted before the Institution through the established channels. This must be done while guaranteeing confidentiality, transparency, respect for human rights, objectivity, impartiality, integrity, protection from reprisals and in accordance with the due process of the law.

Within this framework, the Institute shall not tolerate Retaliation against Whistleblowers and Witnesses. That is, there is zero tolerance for retaliation against Whistleblowers. Retaliation against Whistleblowers and Witnesses constitutes a Prohibited Practice in the Institute.

This policy is governed by the following general principles:

- A. IICA shall maintain a secure, confidential and accessible channel for reports and Complaints, in order to ensure that any person can present a report or Complaint on issues directly or indirectly related to the activities carried out by IICA or its projects.
- B. The Institute has established a Procedure for the Processing of Reports or Complaints, through which the Ethics Committee shall objectively and procedurally evaluate and analyze each report or claim and shall define a way to address it; the aforementioned also applies to false or malicious reports.

- C. Any person may report without encumbrance to the EC any allegations of suspected Wrongdoing that come to his/her attention and cooperate with the EC in the context of an investigation, proactive integrity review or other inquiry without fear of Retaliation.
- D. IICA including the EC shall take all available measures within the capacities of the Institute to protect Whistleblowers and Witnesses who have made a report or cooperated with an investigation in good faith and with reasonable belief that the report, information, or evidence provided is true.
- E. Any person may anonymously report suspected Wrongdoing or provide evidence or information with regard to an investigation.
- F. The Institute shall not release the names of Whistleblowers and Witnesses (if they so request). Such protection shall be afforded even in the event that a report or information of suspected Wrongdoing turns out to be not well-founded, misguided, or incorrect, or that the report or information does not lead to a final determination by the Institute that a Wrongdoing has occurred.
- G. The Institute shall take reasonable measures within its capacities to ensure that the basic rights of any person implicated by a report of Wrongdoing are respected.
- H. Reporting suspected Wrongdoing in no way protects a Whistleblower or Witness from sanctions arising from their own Wrongdoing. In other words, blowing the whistle is no “escape hatch” for complicity in Wrongdoing or for committing other wrongful acts not directly related to the Whistleblower complaint; however, depending on the circumstances, their reporting and degree of cooperation shall be taken into consideration in determining the appropriate sanction or other remedy.
- I. All Covered Individuals have a duty to refuse to participate in any Wrongdoing.
- J. IICA has established a principle-based Grievance Redress Mechanism for Reports or Complaints, through which it seeks to observe, anticipate and redress, in its capacity as an international organization and in keeping with its regulatory framework, any environmental or social impact involuntarily caused by the execution of its projects.

### ARTICLE III. Scope and Applicability

- A. This Policy applies to individuals and/or legal entities, Whistleblowers and Witnesses who report suspected Wrongdoing as defined by this Policy. Reports of suspected Wrongdoing concerning matters shall be handled by the EC. Other reports, Complaints, or grievances falling outside this scope shall be referred to or handled directly by the appropriate Divisions, Delegations, or Units of the Institute or other authorities lawfully exercising jurisdiction. Complex reports involving multiple concerns may be handled by more than one Division, Delegation, or Unit or authority, in keeping with the Procedure for the Processing of Reports or Complaints, which is attached.
- B. Any person or entity that makes a False or Malicious Report, is not protected by this Policy and may be subject to sanctions or disciplinary action in accordance with relevant IICA's policies and guidelines, and the provisions of any contractual agreements existing between the Institute and the person or entity.

## ARTICLE IV. Reporting and Investigation of Suspected Wrongdoing

- A. Any person or entity may report to the EC allegations of suspected Wrongdoing as defined by this Policy. Persons with information concerning suspected Wrongdoing, particularly when it involves Covered Individuals and Counterparties in IICA-related Activities, are strongly encouraged to report such information to the EC.
- B. Subject to protections available, Covered Individuals have a duty to report suspected Wrongdoing as soon as possible after becoming aware of the suspected Wrongdoing in relation to any IICA-related Activity. No approval, authorizations or clearance shall be necessary for IICA's Personnel to report suspected Wrongdoing.
- C. Subject to protections available, any supervisor, manager or other such person of the Institute who receives a report of suspected Wrongdoing which is made in good faith, is obligated to transmit such report without delay to the EC.
- D. In accordance with the legal framework of the Institute and any succeeding Policy pertaining thereto, Counterparties are obligated to promptly inform the Institute of reports of suspected prohibited practices found or alleged in connection with an IICA-related Activity; to investigate reports of suspected Prohibited Practices; and to report preliminary and final findings of such investigations to IICA. This obligation is subject to the terms and conditions of any valid legal agreements or legal instruments entered into with the Institute.
- E. Reports and information shall be sent to the EC through any of the following points of contact, to allow persons to submit and channel reports and Complaints regarding the issues covered by this policy in a confidential manner:
  1. the Institute's official internet page: [www.iica.int](http://www.iica.int) in the REPORTING/COMPLAINTS section; and
  2. the following email address: [ec.ce@iica.int](mailto:ec.ce@iica.int).
- F. The Institute's Procedure for the management of reports or Complaints made at IICA, including the receipt, registration, documentation, consultation, investigation and resolution of same, and the corresponding actions, is attached as an Annex to the present Policy.

If the Whistleblower so wishes, he/she will be advised in due course about the status of the report, and as appropriate, about the results of the investigation. For this purpose, the Whistleblower must provide an email address.
- G. Furthermore, the Grievance Redress Mechanism for Reports or Complaints is also attached to this Policy, which is aimed at ensuring an adequate, fair and respectful treatment of reports or claims received at IICA. In order to mitigate any environmental or social impact involuntarily caused during the execution of the project, the Institute shall ensure that partners and counterparties have access to a redress mechanism at the level of the project.
- H. Where a report of suspected Wrongdoing is made against IICA's Personnel, including members of the EC, and/or their immediate family members, such report shall be made to the Chairperson of EC. Reports of suspected Wrongdoing made against the Chairperson of the EC may be made directly to the Director General and/or Chairperson of IICA's Executive Committee.
- I. Persons or entities reporting suspected Wrongdoing shall do so in good faith and provide where possible any information or evidence in their possession that would support a

reasonable belief that Wrongdoing may have occurred. Prior to making a report, such persons or entities are not required to evaluate or to determine whether a report that they intend to make meets any threshold of seriousness or gravity.

- J. In order to assist the successful conduct of investigations, reports should be as specific as possible. To the extent possible, they should include such details as:
  - 1. The type of suspected Wrongdoing;
  - 2. When, where, and how the suspected Wrongdoing occurred; and
  - 3. Who was involved and may have knowledge of the matters being reported.
- K. Relevant documents or other evidence should be included with the report or provided as soon as possible. The absence of any of the details above, however, should not prevent reporting, nor shall it prevent the EC or any other authority competent for the investigation from investigating reports of suspected Wrongdoing.
- L. Reports of suspected Wrongdoing and any accompanying information or evidence may be made in any language. Where a report is not made in English, the EC shall endeavor to provide translation or interpretation as required.
- M. Protections provided in Articles VIII and IX herein shall apply to persons providing information regarding suspected Wrongdoing. A system to receive and respond to anonymous reports will be available to facilitate anonymous reporting.
- N. Persons who intend to report suspected Wrongdoing and who are uncertain about the rules regarding reporting, or regarding any matter covered by this Policy, may seek confidential advice from the Chairperson of the EC. Covered Individuals may also seek advice on specific cases from the Chairperson of the EC regarding the interpretation or application of this Policy.
- O. Reports of suspected Wrongdoing shall be handled in accordance with the relevant IICA policies and standards. The EC treats seriously and thoroughly investigates reports of suspected Wrongdoing in a manner that is independent and objective by conducting administrative fact-finding investigations, free of control or influence by any other person or entity, and with scrupulous adherence to the principles of fairness and due process.
- P. In instances where reports of suspected Wrongdoing are determined not to fall under the authority of the EC, the EC may refer the person reporting to another body within or external to the Institute as appropriate.

## ARTICLE V. Reporting and Investigation of Retaliation

- A. Any Whistleblower or Witness who believes that he or she may suffer or has suffered from Retaliation as a consequence of reporting a suspected Wrongdoing or for cooperating with an EC investigation should report this concern to the Chairperson of the EC, and in the case of alleged retaliation by the Chairperson of the EC, to the Director General and/or Chairperson of IICA's Executive Committee.
- B. Reporting and investigation of Retaliation follows the same rules and procedures as provided in Article IV of this Policy.
- C. Where person alleges that an action adverse to his/her interest taken by the institute constitutes Retaliation as defined herein, the Institute shall have the burden of proving by



clear and convincing evidence that the action does not constitute Retaliation – that is, that the adverse action against that person would have been taken against that person even if that person had not reported Wrongdoing in good faith as a Whistleblower or Witness.

## ARTICLE VI. Cooperation with Investigations

- A. Subject to protections available, all Covered Individuals have a duty to cooperate (such as by providing information, evidence, or testimony) as Witnesses in investigations of suspected Wrongdoing. This duty is not subject to the authorization of or clearance by any Supervisor or other person, Division, Delegation, Project or Unit of the Institute, and for any Covered Individual, failure to cooperate may result in disciplinary measures as provided in the relevant Institute policies and guidelines.
- B. In accordance with the principles and policies of the Institute, and subject to the terms of the corresponding agreements with the Institute, Counterparties are required to cooperate fully with the Institute in any IICA investigation into reports of suspected Prohibited Practices related to a IICA-related Activity, and take all appropriate measures to ensure the full cooperation of relevant persons and entities subject to such investigation, including, in each case, allowing the Institute to meet with relevant persons and to inspect all of their relevant accounts, records, and other documents and have them audited by or on behalf of IICA. The EC may request other persons who are not Covered Individuals or Counterparties to cooperate as Witnesses in investigations.
- C. All Witnesses to EC investigations shall cooperate in good faith and provide information or evidence which they believe to be true.

## ARTICLE VII. Anonymity and Confidentiality for Whistleblowers and Witnesses

- A. Any person may submit a report of suspected Wrongdoing anonymously. Whistleblowers or Witnesses may request confidentiality regarding their identity, the identity of their close family member(s) or associate(s), and specific information conveyed at, during, or after an investigation. The EC will honor confidentiality requests to the extent possible within the legitimate needs of investigation and to the extent due process permits. In the event the due process rights of persons accused of Wrongdoing require the release of the names of Whistleblowers or Witnesses, the EC shall notify such Whistleblowers or Witnesses in advance of any such release.
- B. In adherence to Institute policies and procedures, the EC will protect confidential information provided by Whistleblowers and Witnesses from unauthorized disclosure before, during, and after an investigation as far as possible using all available means, including physical, electronic, and procedural controls.

- C. During an investigation, the EC shall take appropriate measures to protect the confidentiality of any non-public information associated with an investigation, and will take appropriate measures to prevent the unauthorized disclosure of investigative findings. Under certain circumstances and to the extent due process permits, the EC may also keep confidential the identities of investigators involved in an investigation.
- D. In cases where the disclosure of confidential information, may be legitimately necessary to pursue an investigation or protect the due process rights of persons accused of Wrongdoing, the EC shall notify Whistleblowers, Witnesses, and any other party to an investigation to whom confidentiality has been granted.
- E. On the basis of its jurisdictional immunity, IICA shall have the right to decide whether or not to disclose information, when the Institute pursues sanctions or disciplinary actions in response to an internal report which has been determined false and malicious. In such eventualities, the Institute shall inform the Whistleblower, Witness, or any other party protected about the need for disclosure prior to the disclosure.
- F. The EC will have sole access to investigation files and records, and the authority to determine whether such files and records, unedited or redacted, may be disclosed to individuals other than EC personnel on a need-to-know basis and subject to their obligation to keep confidentiality. Authorized staff of EC and EC members who have a conflict of interest in relation to, or who have recused themselves from, an investigation shall not be privy to any information on such investigation.
- G. EC staff involved in an investigation in any capacity are required to preserve and protect the confidentiality of information related to investigations.
- H. The EC shall inform Whistleblowers of the results of its investigation into the alleged Wrongdoing reported by them, including whether suspected Wrongdoing has been substantiated and whether disciplinary measures, sanctions, or other measures have been taken. The extent of such information to be informed shall be subject to the rules of the Information Disclosure Policy of the Institute.

## ARTICLE VIII. Protections and Remedies for Covered Individuals

- A. Whistleblowers and Witnesses who are Covered Individuals will be accorded, at their request, interim protection without delay, before, during the course of and pursuant to a review or investigation as necessary to safeguard their safety and well-being, in accordance with the Human Resources Legal Framework or any other Institute policy and procedures.
- B. Where there is reasonable concern that a Covered Individual who is deemed to be a Whistleblower or Witness, or his or her close family member(s) or associate(s), may suffer, or are suffering, from retaliation (in connection with his or her report of suspected Wrongdoing) which may involve threatened or actual harm to personal security and well-being, the EC shall recommend to the Institute's Director General to take the corresponding protective measures.
- C. Where Retaliation against a Whistleblower or Witness who is a Covered Individual, has been substantiated through investigation, the Covered Individual may request, and the EC may recommend, that the Institute implement remedies. The EC will consult with the Director

General or the relevant Heads of Independent Units, as appropriate, with regard to the practicability, proportionality, remedies which the EC may recommend. Remedies include rescission or cessation of the retaliatory action and, if relevant, reinstatement to a post or reissuance of contract, and that the Institute pay compensation in an amount reasonably necessary to compensate the said Whistleblower or Witness for the actual damages suffered. The Director General, or the Head of the relevant Independent Unit, as appropriate, shall determine the relevant remedies.

- D. Where Retaliation against a Whistleblower or Witness who is an EC member has been substantiated through investigation, the EC member may request remedies directly to the Director General, who shall determine the remedies to be implemented by the Institute.
- E. The Institute shall ensure that the protection or protective measures and the remedies are implemented without delay.

## ARTICLE IX. Protections and Remedies for External Whistleblowers and Witnesses

- A. External Whistleblowers and Witnesses are entitled to the protection provided in this Section and Article VIII above.
- B. The Institute shall endeavor to ensure that external Whistleblowers and Witnesses are protected from Retaliation by Covered Individuals. Covered Individuals who are found to retaliate against External Whistleblowers and Witnesses shall be subject to corrective or disciplinary measures or sanctions, as applicable, in accordance with Institute policies and guidelines. A Counterparty who is found to have directly or indirectly condoned, encouraged, participated, or engaged in Retaliation against Whistleblowers or Witnesses may be subject to sanctions in accordance with relevant Institute policies, subject to any legal agreements, which may be concluded between the Institute and the Counterparty.
- C. Where an External Whistleblower or Witness, his or her close family member(s) or associate(s) may or does suffer Retaliation because of a report of suspected Wrongdoing or cooperation with an EC investigation, the Institute shall endeavor to apply its good offices with the corresponding authorities to secure necessary protection and to employ other reasonable measures to reduce the risks of retaliation.
- D. Where Retaliation against an External Whistleblower or Witness by a Covered Individual or a Counterparty has been substantiated through an Institute investigation, and corrective or disciplinary measures have been imposed against a Covered Individual, or sanctions have been imposed against a Counterparty, the EC, may recommend that the Institute or the Counterparty take appropriate and timely remedies for the benefit of such External Whistleblower or Witness.

## ARTICLE X. External Reports

- A. Protections against Retaliation shall be extended to a Covered Individual who reports suspected Wrongdoing to a governmental law enforcement authority outside of the established internal mechanisms where that person can show that:
  - 1. Such reporting is necessary so as to avoid: A significant threat to public health and safety; Substantive damage to Institute operations; or Violations of national or international law;
  - 2. The established internal mechanisms are inadequate because: (a) the Covered Individual has reasonable grounds to believe that it is not possible to report the suspected Wrongdoing through the established internal mechanisms because all such avenues would subject the Covered Individual to Retaliation within the Institute; (b) the Covered Individual has reasonable grounds to believe that it is not possible to report the suspected Wrongdoing through the established internal mechanisms because all such avenues would create a likelihood that evidence relating to the suspected Wrongdoing will be concealed or destroyed; or (c) the Covered Individual has previously reported the suspected Wrongdoing through the established internal mechanisms (and not on an anonymous basis), and was not informed in writing of the status of the matter within six months of such report; and
  - 3. The Covered Individual does not accept payment or any other benefit from any party for such report.
- B. External reports made and consistent with any confidentiality obligations to concerned third parties will not be considered as a breach of obligations relating to disclosure of information as provided for in Institute policies and guidelines.

## ARTICLE XI. Additional Procedural Safeguards

- A. Any person or entity implicated by a report of suspected Wrongdoing must be notified within a reasonable time of the report made against them, provided that this notification does not impede the progress of the procedure for investigating the suspected Wrongdoing; and
- B. In keeping, with the principles of due process, no information shall be provided regarding the findings in respect of an implicated person or entity unless that person or entity has had the opportunity to respond to the report of suspected Wrongdoing, to examine the evidence supporting the report (subject, if necessary, to redaction for purposes of honoring the confidentiality provisions established in this Policy) and comment on the final report of the EC. At the request of the implicated person, any such comments shall be forwarded to the Director General with the EC report of Wrongdoing.

- C. The procedures and procedural rights of IICA staff members regarding the determination of disciplinary measures and any administrative review or appeal thereto shall be observed in accordance with the Personnel Rules and the Manual of Personnel.
- D. Nothing in this Policy shall affect or shall be construed as a limitation or waiver of the privileges and immunities enjoyed by the Institute and/or the personnel.

## ARTICLE XII. Communication, Capacity Building, and Cooperation

- A. The EC, with the support of the Institute's Human Talent Division, will proactively make known and communicate this and other integrity policies and procedures of the Institute to Covered Individuals Counterparties, and interested stakeholders. It shall ensure that channels for reporting suspected Wrongdoing are reasonably accessible and available.
- B. To further the effective implementation of this Policy, the Institute's Human Talent Division will conduct integrity training in coordination and cooperation with relevant Divisions, Delegations, and Units of the Institute.
- C. IICA shall endeavor to exchange information and experiences with other international organizations regarding the implementation and improvement of Whistleblower policies and protections, subject to the availability of resources.

## ARTICLE XIII. Policy Administration, Monitoring, Reporting, and Review

- A. The EC, in conjunction with the Human Talent Division and the Institute's Legal Advisors, shall be responsible for the implementation of this Policy, which includes advising other areas of the General Directorate for the purpose of assuring strict compliance with its provisions.
- B. The EC shall report on an annual basis to the Director General on the activities it has taken to comply with its obligations under this Policy. In addition to describing those activities, the Report shall contain an evaluation of the effectiveness of this Policy for the subject year and any recommendations for its modifications in light of evolving relevant international standards and other pertinent considerations. The annual reports of the EC shall be available to the Audit Review Committee, the Institute's auditors, and any IICA Member State upon written request to the Director General or Chairperson of the EC.
- C. This Policy shall enter into force once it has been approved by the Director General of the Institute.

## Procedure for the Processing of Reports or Complaints

### 1. Purpose

Through its policies and control mechanisms, the Inter-American Institute for Cooperation on Agriculture (IICA) combats prohibited practices and acts of embezzlement; it also effectively prevents, detects and mitigates any practices that jeopardize the adequate use of the resources entrusted to the Institute.

As part of its regulatory framework, IICA has established a Policy for the Processing of Reports and the Protection of Whistleblowers and Witnesses, which is implemented through the Procedure described herein. The Procedure guarantees compliance with the Policy by means of a transparent mechanism for detecting and contesting any suspected Wrongdoing. It also establishes investigation processes based on the principles of objectivity, integrity, due process, confidentiality, respect and protection from reprisals.

### 2. Scope and Applicability

This procedure applies to all individuals (whether IICA staff members or not) and/or legal entities who submit a report or Complaint to the Institute about suspected Wrongdoing, by means of the official channels that have been established for this purpose.

Through its Ethics Committee, the Institute will examine and analyze each Complaint in an objective and procedural manner, as well as determine how to address the situation; this also applies in the case of false or ill-intentioned accusations.

### 3. Procedure

The procedure for processing reports or Complaints submitted to IICA is as follows:

- a. The complainant (any individual and/or legal entity, who may or may not be involved in IICA's regular activities) must file his or her Complaint through either of the channels established by the aforementioned Policy in section E of *Article IV. Reporting and Investigation of Suspected Wrongdoing*:
  - i. The official Intranet site: [www.iica.int](http://www.iica.int), under the REPORTS/COMPLAINTS section;  
or
  - ii. The email address [ec.ce@iica.int](mailto:ec.ce@iica.int).
- b. The individual filing the report or Complaint may choose to identify him or herself or remain anonymous.

- c. The Chair of the Ethics Committee of the Institute will open a file for each case, documenting the entire process: filing of the Complaint, investigation, information gathering, analysis, conclusion, implementation and follow-up, among other aspects. In doing so, the Committee will clearly demonstrate that all reports and Complaints submitted to IICA are dealt with in a timely and objective manner.
- d. The Chair of the Ethics Committee will analyze the case and determine the institutional policy and organizational entity through which the report or Complaint should be addressed and analyzed. Cases will be dealt with on the basis of sufficient evidentiary information and will be handled with due diligence; to this end, the Legal, International Affairs and Protocol Unit may provide advice.
- e. In strict compliance with the scope of the corresponding institutional policy, the Ethics Committee or the corresponding organizational entity will analyze the case and conduct the corresponding investigation. In the case of issues regarding which there is no institutional policy in place, the Ethics Committee will determine the criteria that will be applied to analyze the case, which must be documented in the corresponding file.
- f. The corresponding organizational entity or the Ethics Committee will obtain any necessary information in order to reach a justified and well-documented conclusion, as well as issue a recommendation. This recommendation must describe corrective, punitive, and, where appropriate, reparative actions, in keeping with the principles established in the Grievance Redress Mechanism, which is included below, that should be undertaken; otherwise, it must indicate that these actions are not necessary. The complainant shall be notified of the resolution and closure of the case and file.
- g. The corresponding organizational entity or the Ethics Committee will issue an official response by means of a written notification to the individual who filed the report or Complaint, indicating the conclusion, resolution and corresponding actions. The scope of the information provided to the complainant will be subject to the rules of IICA's Information Disclosure Policy.
- h. Once the investigation has ended, the Ethics Committee will close the file, guaranteeing the confidentiality of the information contained therein, as well as the protection of the personal data of complainants and witnesses.
- i. The Institute's Directorate of External and Institutional Relations is responsible for maintaining the institutional repository of reports or Complaints and their respective files, which shall be stored in a safe and confidential manner.
- j. In the event that the report or Complaint filed involves a project, counterparty or partner of the Institute, IICA must inform that entity of the Complaint filed, the analysis and investigation carried out, and the conclusions and recommendations made in reference to the case. To this end, the Institute must guarantee compliance with the provisions set out in Article XI, *Additional Procedural Safeguards*, of the aforementioned Policy, as well as in IICA's Personal Data Protection Policy.

#### 4. Follow-up

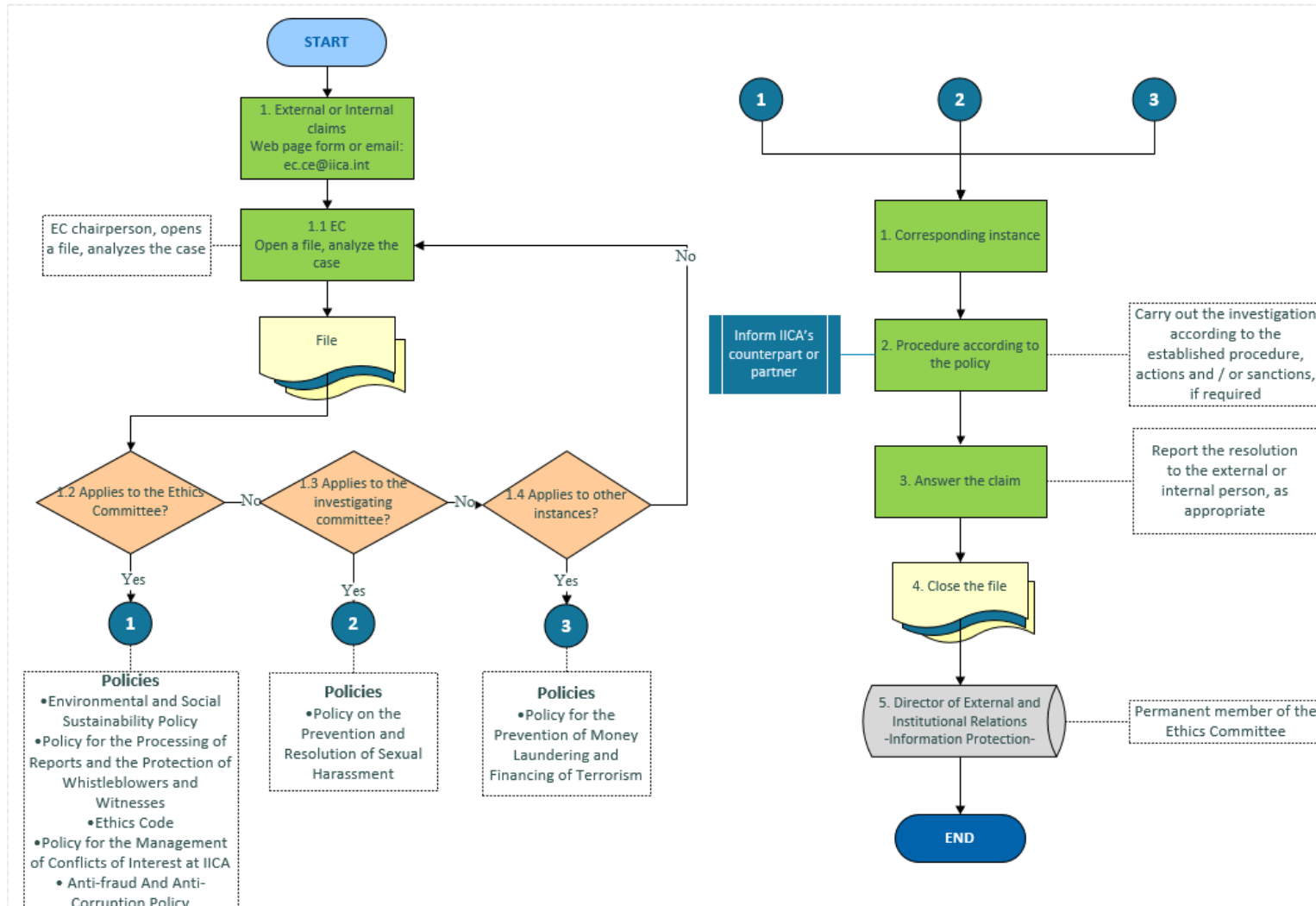
The Internal Audit Unit shall carry out annual reviews regarding the adequate application of this Procedure for the Processing of Reports or Complaints, and shall present its recommendations to the Director General.

#### 5. Updating

The Procedure for the Processing of Reports or Complaints and its guidelines may be updated when deemed appropriate by the Director General, in keeping with the Institute's principles of transparency and accountability.



### Flowchart- Procedure for the Processing of Reports or Complaints



## Grievance Redress Mechanism for Reports or Complaints

### 1. Purpose

The Inter-American Institute for Cooperation on Agriculture (IICA), by way of its policies and procedures, is committed to ensuring an adequate, fair and respectful treatment of reports or Complaints submitted before the Institution through the established channels, while guaranteeing confidentiality, transparency, respect for human rights, objectivity, impartiality, integrity, protection from reprisals, and in accordance with the due process of law.

As part of its regulatory framework, IICA has a Policy for the Processing of Reports and the Protection of Whistleblowers and Witnesses, which this Grievance Redress Mechanism is part of, and which shall be governed by the principles and procedures established herein.

The Institute shall make its utmost efforts to identify potential risks, categories, causes, events and impacts that could arise during the execution of its projects, whether these are financed internally or externally, in the early stages of the project cycle. The Institute will also aspire to learn and capitalize on the lessons learned regarding the Grievance Redress Mechanism.

In the same vein, the Institute is committed to observing, anticipating and redressing, in its capacity as an international organization and in keeping with its regulatory framework, any environmental or social impact involuntarily caused by the execution of its projects.

### 2. Scope and applicability

This mechanism applies to individuals and/or legal entities that file a report or Complaint to the Institute through the established official channels, on alleged irregular or wrongful acts, whether this report or Complaint is presented by internal or external personnel of IICA.

The Institute shall examine and analyze each report or Complaint according to the conditions set forth in the Legal Instrument signed with the counterparty for the execution of the project, as well as in the Procedure for the Processing of Reports or Complaints, contained in this Policy for the Processing of Reports and Protection of Whistleblowers and Witnesses.

### 3. Principle-based Grievance Redress Mechanism for Reports or Complaints

The Grievance Redress Mechanism for Reports or Complaints is based on the following principles:

a. **Equity.** Whistleblowers or complainants shall receive fair, equal, impartial treatment, irrespective of their gender, language, level of education, culture, age, financial condition or ethnic origin.

They shall also receive sufficient information explaining the Procedure for the Processing of Reports or Complaints and their participation in said process. If necessary, and should the adequate staff not

be available, the Institute may resort to neutral experts on the issues concerned in the report and on human rights, so as to ensure the fair treatment of the Whistleblower or complainant.

**b. Efficiency:** Concerns shall be addressed promptly, by applying a clear, transparent process that is easily accessible to all segments of the communities or persons involved, with no cost or retaliation.

**c. Legitimacy:** Each process shall be legitimately addressed, for all potential stakeholders or persons involved, with the full support of the Institute. They shall have access to a fair and effective hearing to voice their Complaints. To this end, the Institute must be familiar with the legal and administrative mechanisms available in the corresponding country for dispute resolution, and not hinder access to such mechanisms; moreover, in cases of doubt, they shall agree with the parties that a Conciliation Committee intervene to ensure the transparency and legitimacy of the process.

**d. Effectiveness:** Based on the principles that govern over its actions, which are set forth in the Medium-Term Plan, the Institute shall look for solutions to the Complaints in a collaborative manner, with the participation of the community and persons involved. Respect and communication will be prevalent throughout the process, and solutions will be identified on the basis of dialogue.

**e. Accessibility:** Potential Whistleblowers or complainants shall be provided with comprehensible information, facilitating the possibility for them to present a report or Complaint. IICA, in keeping with its policies, has established a channel to submit reports or Complaints to the Ethics Committee. However, in the case of communities with limited access to information technology or marginalized populations, the Institute shall provide accessible, easy-to-understand information and shall assist the complainant or Whistleblower so as to ensure the principle of equity.

On IICA's website, [www.iica.int](http://www.iica.int), a link can be found at the bottom of the page for Reports/Complaints, which leads to the form. You can also access the Reports/Complaints form directly at the following link: <http://apps.iica.int/transparenciiaiica/public/Reporte?LG=es>

**f. Independence:** The Grievance Redress Mechanism for Reports or Complaints shall be executed by staff members with no direct ties to the projects under which the Complaint or report is presented, in order to ensure the independence of the analysis, the resolution and the overall process. It is for this reason that the Institute shall address Complaints or reports through the Ethics Committee and not through a single staff member, in order to ensure the fair treatment and the observance of the principles herein.

**g. Predictability.** Whistleblowers or complainants must be familiar with the steps of the process, their rights and obligations. The Institute shall establish an appropriate timeframe to address the report or Complaint, and provide results and follow-up. The Institute shall keep a record of reports and Complaints, their resolution and remediation.

**h. Transparency:** Whistleblowers or complainants shall be kept informed of the progress made in the processing of their Complaint, must be able to understand the results of their Complaints and their corresponding implications. The dialogue between the Institute and the Whistleblower or complainant shall remain confidential when so requested by the Whistleblower or complainant. The Institute shall document the entire processing of the Complaint or report from the beginning, and the file shall be closed upon completion of said process.

**i. Ongoing learning:** By keeping a record and following up on reports and Complaints, the Institute shall learn from its mistakes, capitalize on the lessons learned and strengthen its mechanisms for risk identification, integrating them into its training processes. Through this feedback, the institute must identify the systematic changes needed to strengthen project management and the Grievance Redress Mechanism for Reports or Complaints.

**j. Observance of rights.** All results and remedies must be in keeping with internationally recognized human rights.

#### 4. Other considerations

- a. In its capacity as an international organization, pursuant to its Convention and given the fact that it manages funds of the Member States, the Institute shall not grant, under any circumstance, financial compensation for proven damage caused by the execution of a project led by IICA.
- b. In order to mitigate the environmental and social impacts involuntarily caused during the execution of the projects, the Institute shall ensure that partners and counterparties have access to a grievance redress mechanism at the level of the project.

#### 5. Compliance

Complying with the Grievance Redress Mechanism for Reports or Complaints is the responsibility of the Institute's Ethics Committee, as a component of the ethical infrastructure of IICA.

The Institute shall ensure that all Complaints or reports are analyzed in a collaborative manner, by applying specialized resources. Should these resources not be available internally, the Institute may contract independent services in order to ensure compliance with the Mechanism, in keeping with the principles established herein. The Ethics Committee shall notify the Director General of all Complaints, reports or grievance redress mechanisms.

Institutional policies shall apply, with no exception, to all activities and operations of the Institute regarding the direct provision of technical cooperation services, or the provision of technical cooperation management services. They shall also apply to both the direct and indirect execution of projects, such as those carried out through sub-delegated executing entities, which must include a grievance redress mechanism at the level of the project. Those entities that do not have such a mechanism shall adopt the one developed by IICA.

**6. Registry**

The Institutional Ethics Committee is responsible for keeping a registry of Complaints or reports that are presented and their status, as shown below.

The use of the information contained in said registry shall be treated according to the Policy on Protection of Personal Data, which includes best practices and international standards on the use of personal information.

**Registry of Complaints or reports**

Name	Complaint or report	Description	Initial date	Actions taken (approach, communications)	Status to date	Summary of the response	Date of notification to complainant or Whistleblower	Date of closing of the file

**7. Follow-up**

The Internal Audit Unit shall carry out annual reviews regarding the adequate application of this Grievance Redress Mechanism for Reports or Complaints, and shall present its recommendations to the Director General.

**8. Updating**

The Grievance Redress Mechanism for Reports or Complaints and its guidelines may be updated when deemed appropriate by the Director General, in keeping with the Institute’s principles of transparency and accountability of the Institute.