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Annual report of the Ethics Office for 2025

Executive summary

This annual report is submitted to the Executive Board for its 2026 annual session, having been provided directly to the Executive Director.¹

The report provides an overview of the activities and achievements of the Ethics Office during the period from 1 January to 31 December 2025. It is organized according to the office's mandated areas of work, as follows:

- A. Advice and guidance
- B. Annual conflicts of interest and financial disclosure programme
- C. Protection against retaliation – whistleblower protection policy
- D. Standard setting and policy advocacy
- E. Training, outreach and awareness raising

The report also contains a section on United Nations coherence and ends with observations related to the work of the Ethics Office and to ethics within WFP.

Draft decision*

The Board takes note of the annual report of the Ethics Office for 2025.

¹ Executive Director's circular ED2008/002. *Establishment of Ethics Office*, paragraph 6.2.

* This is a draft decision. For the final decision adopted by the Board, please refer to the decisions and recommendations document issued at the end of the session.

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I. Introduction

1. This report covers the work of the Ethics Office for the period from 1 January to 31 December 2025, providing analysis and, where relevant, information regarding activities planned for 2026.
2. The Ethics Office is required to provide an annual report on its work to the Executive Director for submission to the Executive Board.² The office is also required to submit the draft annual report to the Ethics Panel of the United Nations (EPUN) for the panel's review.³
3. The Ethics Office is an independent office whose director is accountable to and reports to the Executive Director. The office also delivers regular briefings to the Executive Board and to WFP's Independent Oversight Advisory Committee. All activities of the office are based on the principles of confidentiality and independence.

II. Background

4. The Ethics Office was established in January 2008, through Executive Director's circular 2008/002,⁴ in accordance with the Secretary-General's bulletin ST/SGB/2007/11 on ethics in the separately administered organs and programmes of the United Nations system.⁵
5. The office nurtures a culture of ethics and accountability and is mandated to assist the Executive Director in ensuring that all WFP employees perform their functions in accordance with the highest standards of conduct, WFP's values, the standards and principles set out in the Charter of the United Nations, the Standards of Conduct for the International Civil Service,⁶ the WFP Code of Conduct⁷ and other relevant policies and practices.
6. The Ethics Office strategy for 2024–2026 remains in effect and continues to guide the office's work. Development of a new strategy for the period beyond 2026 will begin in 2026.
7. Operating in high-risk environments and supported by a diverse, constantly evolving and multicultural workforce across more than 120 countries and territories, WFP relies on its strong reputation and effectiveness to deliver on its mandate. During periods of financial constraints and necessary cost-saving measures, it is more important than ever to safeguard and draw on the organization's trust and credibility to ensure its long-term resilience. The Ethics Office plays a vital role in offering timely guidance and support, helping employees understand and uphold WFP's ethical standards and principles and contributing to effective risk management.
8. In 2025 the Ethics Office comprised a director, one P-5 Senior Ethics Officer, one P-3 Ethics Officer, two ethics consultants, one outreach and communications consultant (engaged for part of the year) and two General Service staff. This team of eight supported the ethics needs of WFP's entire workforce, comprising approximately 20,000 employees.

² Executive Director's circular ED2008/002, *Establishment of Ethics Office*.

³ United Nations. 2007. Secretary-General's Bulletin, *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11).

⁴ Executive Director's circular ED2008/002, *Establishment of Ethics Office*.

⁵ United Nations. 2007. Secretary-General's Bulletin, *United Nations system-wide application of ethics: separately administered organs and programmes* (ST/SGB/2007/11).

⁶ International Civil Service Commission. 2013. *Standards of Conduct for the International Civil Service*.

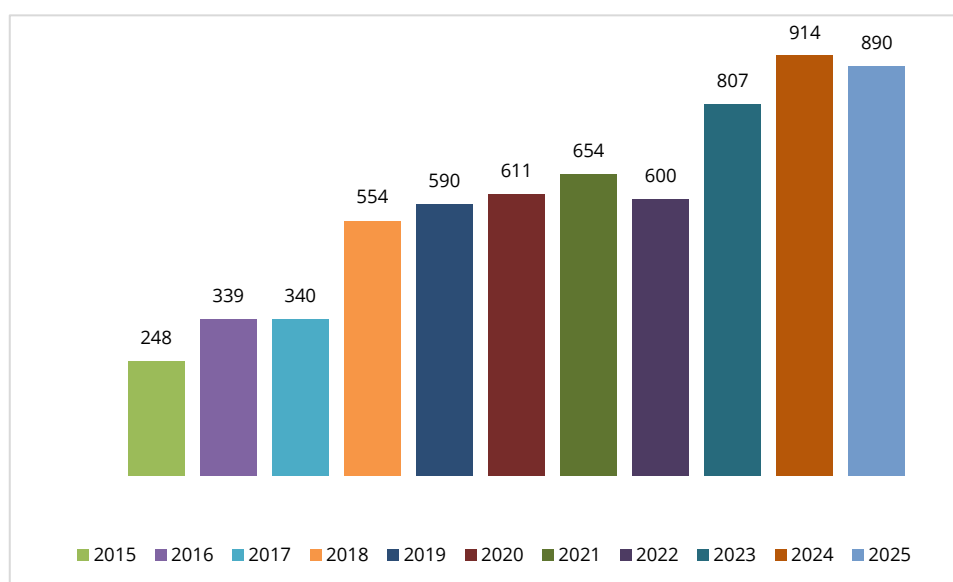
⁷ Executive Director's circular OED2022/014, *WFP Code of Conduct*.

III. Activities of the Ethics Office

A. Advice and guidance

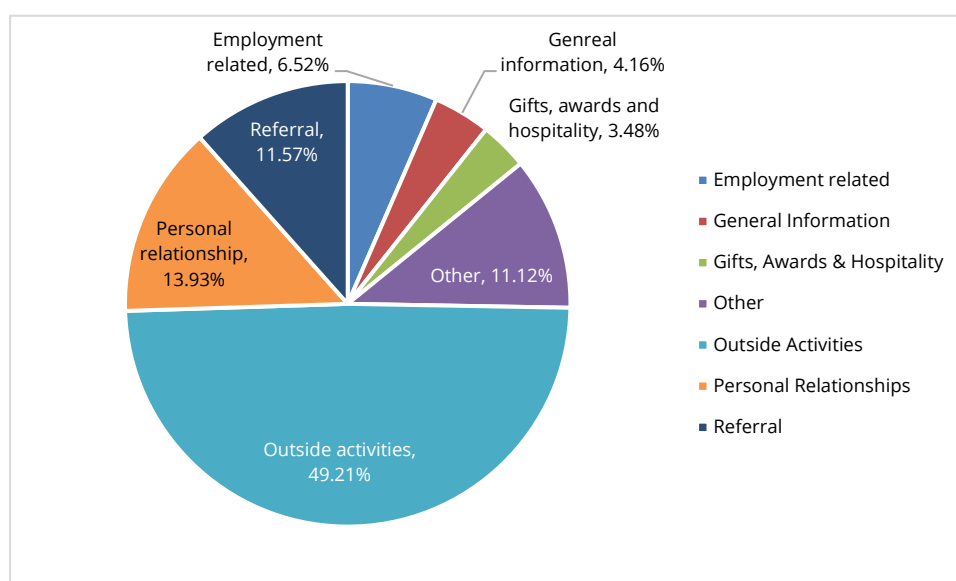
9. Advice and guidance is a confidential service available to all employees and management with the aim of supporting them in navigating ethical risks and making informed ethical decisions. This service involves analysing potential conflicts of interest, identifying mitigation measures and preventing reputational risks. In that regard, the office plays a key role in risk prevention and management, which is essential to upholding ethical standards and fostering a culture of integrity. The office promotes awareness and adherence to relevant rules, policies and standards of conduct, ensuring that WFP remains trustworthy and accountable.
10. In 2025 the Ethics Office registered 890 requests for advice and guidance (figure 1). Although this is a slight decrease from the 914 requests received in 2024, the rate of requests relative to the size of the workforce increased slightly; this reflects sustained confidence in the advice and guidance provided by the office and shows that it is considered both relevant and valuable. Voluntary satisfaction surveys showed that 96 percent of respondents were “satisfied” or “very satisfied” with the advice received and its timeliness.

Figure 1: Number of requests for advice, 2013–2025*



* Excluding advice related to the annual disclosure programme.

11. Requests included individual enquiries from employees seeking advice on personal situations (59 percent) and work-related enquiries, including from management and Human Resources Division (HRM) colleagues (38 percent). The remaining 3 percent related to requests from outside WFP.

Figure 2: Requests for ethics advice by category, 2025*

* Excluding advice related to the annual disclosure programme.

12. Overall, in 2025, the nature of requests for advice and guidance evolved noticeably, shifting from predominantly administrative or compliance-related queries towards more complex matters linked to employees' external professional activities and public engagement.
13. Figure 2 summarizes requests for advice and guidance by category. As in previous years, the largest proportion of requests (49 percent) referred to outside activities. Within this category, activities such as writing, teaching and speaking engagements continued to feature prominently. The most notable growth was observed in outside activity disclosures, including requests related to secondary employment. This is likely an indication of both heightened staff engagement in external work stemming from employment uncertainty and greater awareness of disclosure obligations. Interest in writing and publication activities also rose, reflecting increased staff visibility in professional and digital arenas and a growing need to navigate the boundary between personal expression and organizational responsibilities. Engagement in outside business similarly expanded, suggesting a broader trend towards parallel professional interests, while queries concerning charitable, social and cultural involvement increased as more employees sought guidance on how to pursue community-focused roles responsibly and transparently.
14. Overall, these patterns suggest that employees are engaging more frequently in external professional and public-facing activities and are demonstrating greater awareness of the need to disclose their engagements.
15. The second most frequent category of requests, similar to previous years, concerned personal relationships, most often involving disclosures that a family member worked for a host government, another United Nations entity or a WFP partner. This reflects healthy employee awareness of the need to disclose and seek guidance on how to mitigate the associated risks.
16. Employment-related matters that were not personal requests but were from managers or other employees in the context of their official responsibilities decreased from 114 in 2024 to 60 in 2025. As most of these requests were made by HRM during recruitment and linked to pre-appointment disclosures of outside activities or family relationships, this decrease is a positive indicator of the effectiveness of the training that the Ethics Office has provided to HRM about the proper use and escalation of disclosure forms. It also reflects a general decline in staff recruitment in 2025.

17. The “other” category, which also recorded a notable increase, covers a range of queries that do not fit into the other classifications. These included questions related to political activity and requests from country offices for consultation on sensitive or ethically challenging decisions. The increase in this category points to the evolving complexity of the ethical issues on which advice and guidance is sought and, potentially, increased trust in the advice of the Ethics Office.
18. Demonstrating the effectiveness of outreach and awareness efforts, 73 percent of requests originated from outside headquarters.⁸ There were notable increases in requests for advice from the Asia and Pacific and Latin America and the Caribbean regions, largely from country offices where training and awareness sessions had been conducted during the year, further indicating the importance of outreach to promoting engagement on and awareness of ethical considerations. External requests from outside WFP also increased, underscoring broader recognition of the advisory role of the Ethics Office.
19. In addition to requests for advice, 287 disclosures were recorded in WFP’s electronic gift register⁹ in 2025. This is a decrease of 18 percent from 2024, which may be due to the reduction of the workforce and the impact of guidance provided to vendors and partners on refraining from offering gifts to WFP employees. In this regard, it is also noted that country directors provided positive feedback on the targeted awareness campaigns for staff on non-acceptance of gifts and messages to vendors and partners on not offering gifts. In 2026, the Ethics Office will continue to support this work by providing country directors with information on gift disclosures made by employees in their offices so as to facilitate possible follow-up and to inform their input for the Executive Director’s assurance exercise.
20. Lastly, in line with established practice and in coordination with the Management Services Division, surrendered gifts at headquarters were, where appropriate, auctioned alongside other items, with the proceeds directly supporting country office cost-saving initiatives.

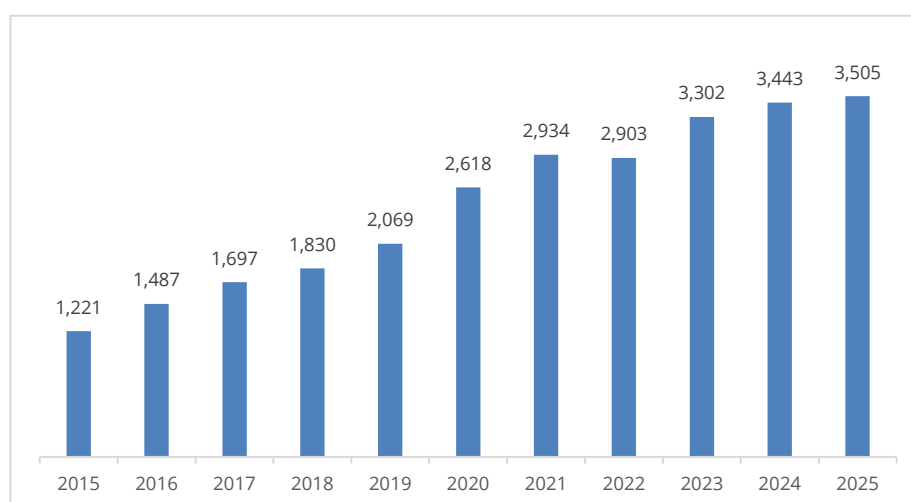
B. Annual conflicts of interest and financial disclosure programme

21. The Ethics Office administers an annual conflicts of interest and financial disclosure programme¹⁰ (ADP), which is a preventive safeguard and risk management tool that helps WFP to meet its commitment to transparency and build stakeholder confidence. The ADP helps WFP to identify and mitigate personal conflicts of interest to ensure that they do not interfere, nor could be perceived as interfering, with official decision-making or action and that all action taken is in the best interest of WFP. It is not a tool for uncovering fraud or unjust personal enrichment.

⁸ It should be noted that, for statistical purposes in 2025, “headquarters” refers to headquarters in Rome, not global headquarters.

⁹ The gift register is an easy-to-use online tool that provides information on disclosed gifts and allows the Ethics Office to follow up on the appropriate handling of such gifts and provide advice when needed. Executive Director’s circular OED2017/002, [Disclosure of Gifts](#).

¹⁰ Executive Director’s circular OED2020/007, [Conflicts of Interest and the Annual Conflicts of Interest and Financial Disclosure Programme](#).

Figure 3: Employees required to participate in the disclosure programme, 2015–2025

22. The seventeenth ADP exercise was launched on 14 May 2025 with a message from the Executive Director to all employees meeting the criteria for required participation. The message underscored the ADP's significant role in safeguarding WFP's integrity and underscored each participant's individual responsibility, as well as WFP employees' shared commitment to ethical conduct. In 2025, approximately 16 percent of WFP employees¹¹ were invited to participate in the ADP.
23. The ADP is intentionally focused on employees whose roles or responsibilities expose them to greater risk of conflict of interest and are critical for maintaining organizational integrity. Participants include all directors and heads of units, offices, and area and sub-offices; employees with procurement or financial authority; those authorized to enter into agreements with external parties or with access to confidential information; oversight, evaluation, legal, human resource, risk and compliance officers; members of selection committees, and others designated by their managers based on the nature of their duties.
24. The year-end final completion rate for the ADP was 99 percent. After extensive follow-up, the Ethics Office provided the HRM Staff Relations Branch (HRMSR) with the names of those employees who had not participated as required so that HRMSR could take appropriate administrative or disciplinary action.
25. As in previous years, the Ethics Office used the support of an external firm to conduct the preliminary review of and follow-up on the questionnaires completed by ADP participants. Approximately 70 percent of the questionnaires submitted did not include any responses or disclosures requiring further information or review. The remaining 26 percent (908) required further review. The majority of the disclosures requiring review related to family members working at WFP, other United Nations entities, WFP partners or governments. Other disclosures related to outside activities, and a few to financial links or investments with WFP vendors or partners. Based on the additional information provided by the participants, many of these disclosures did not require further advice or mitigating action and were closed. The Ethics Office issued specific advisories to 120 participants (3.4 percent of the participants submitting questionnaires). Advice provided typically included recommendations to inform relevant supervisors so that appropriate mitigating measures could be put in place when necessary, such as recusal or redistribution of tasks, the obtaining of supervisory approval for outside activities or the submission of required gift disclosures. Advice was also provided regarding the need for employees to exercise

¹¹ The total number of WFP employees as of May 2025 was 21,756.

appropriate discretion, to maintain clear boundaries between personal and professional matters and to contact the Ethics Office in the event of any changes in the circumstances.

26. In 2025 the Ethics Office, with support of the Technology Division, continued to enhance the ADP system to improve efficiency and user experience and reduce manual processes. Building on previous improvements and feedback, the import function for names of eligible employees was expanded, further streamlining the preparatory phase of the ADP process. Minor adjustments were also made to the questionnaire to capture necessary information and reduce the need for follow-up. As the current software has been in place for several years, the Ethics Office asked the Technology Division to undertake a full assessment of its security adequacy, and updates were made to ensure continued alignment with technical security standards prior to the launch of the 2026 ADP.

C. Protection against retaliation: whistleblower protection policy

27. The primary objective of WFP's whistleblower protection policy¹² is to encourage employees to report allegations of wrongdoing and misconduct without fear of retaliation. The policy applies to all current and former WFP employees, regardless of their contract type, who allege that they have been subjected to or threatened with retaliation as a consequence of reporting wrongdoing or misconduct or cooperating with a duly authorized audit, inspection, investigation, proactive integrity review or evaluation. Whistleblower protection is essential to combatting, among other things, fraud, corruption and gross misuse of resources. The Ethics Office continues to promote understanding of this policy in its outreach and awareness activities in order to foster a culture in which employees feel safe in speaking up.
28. The Ethics Office is responsible for conducting a preliminary review of each request for protection against retaliation to determine whether there is a prima facie case of retaliation. If there is, it refers the case to the Office of Inspections and Investigations (OIGI) for investigation. Before, during and after its preliminary review, the Ethics Office may recommend interim protection measures to protect the affected employee, if deemed appropriate. Such actions may include reversing or amending decisions and/or actions affecting the complainant, implementing measures to restore a fair working environment and facilitating resolution processes. The overarching goal is to address concerns effectively, remedy any harm suffered and maintain trust in the policy.
29. If retaliation is substantiated by OIGI, the Executive Director, after considering any recommendations made by the Ethics Office and in consultation with the person affected by retaliation, will take appropriate redress measures. If it is determined by the Ethics Office that there is no prima facie case of retaliation, the case is not referred to OIGI and is closed. If the affected person wishes to have the matter further reviewed, he or she may request the Executive Director to refer the matter to an alternative reviewing body for a secondary review.
30. In 2025 the Ethics Office registered an increase in requests for whistleblower protection. A total of 59 enquiries were received in 2025, compared with 28 in the previous year. Requests were submitted from all regions and global headquarters and from employees across every category, contract type and gender, thus presenting no evident trend or pattern in that regard.
31. Of the 59 requests received, 37 were requests for protection against retaliation under the whistleblower protection policy, while the other 22 were requests for guidance related mainly to concerns about workplace reprisals, allegations of abusive conduct or disagreements regarding work performance. As the latter requests did not involve

¹² Executive Director's circular OED2020/022, [Protection against Retaliation Policy \(or Whistleblower Protection Policy\)](#).

retaliation as defined under the whistleblower protection policy, the complainants were provided with information on the appropriate internal avenues for further support, including channels for reporting allegations of misconduct or other recourse mechanisms. With the consent of the complainants, the Ethics Office may also refer such matters directly to appropriate internal avenues.

32. Of the 37 requests for protection from retaliation received in 2025, the Ethics Office determined that 27 were not prima facie cases of retaliation and were closed. Five other requests were eventually closed because the affected persons stopped answering communications from the Ethics Office or decided not to proceed. Five other requests were received at the very end of 2025 and remained under review at the end of the year; of those, three were closed in January 2026 on the grounds that they did not present a prima facie case of retaliation.
33. All three requests for protection against retaliation that were still open at the end of 2024 were closed in 2025 because no prima facie case of retaliation was established. One request that was determined by the Ethics Office to present a prima facie case of retaliation and was referred to OIGI for investigation in 2024 remained open at the end of 2025.
34. It is noted that the substantial increase in the number of requests in 2025 also reflects multiple submissions from a few individuals. The total number of requests also includes one request handled by the Ethics Office on behalf of a member of EPUN and five requests referred to other EPUN members due to potential conflicts of interest that prevented the WFP Ethics Office from conducting the preliminary review.
35. The Ethics Office also noted a rise in enquiries in which complainants alleged that the abolition of their posts constituted retaliatory action. This increase is in part a reflection of the broader organizational climate and uncertainty associated with the reduction of posts across the organization.
36. The average time taken by the Ethics Office to review and respond to requests was 10 days from the receipt of all requested information, well within the 45-day timeline for the completion of a preliminary review set out in the whistleblower protection policy.
37. The Ethics Office continued its efforts to raise awareness of the whistleblower protection policy and maintained close collaboration with HRMSR, OIGI and the Office of the Ombudsperson and Mediation Services (OBD) in order to help employees better understand the policy and WFP's overall approach to protection from retaliation and reprisal.
38. The Ethics Office developed a practical guide for managers – *Navigating Organizational Change: Preventing Retaliation through Ethical Leadership* – which was included in the employee support programme coordinated by the Wellness and Culture Division of the Workplace and Management Department. This quick reference guide was designed to support managers in leading teams through changes ethically, with integrity, transparency and full alignment with WFP's policies, minimizing the risk that well-intentioned actions might be misinterpreted.
39. As part of its 2025 workplan and reflecting its commitment to the regular assessment of ethics-related policies, the Ethics Office undertook a review of the whistleblower protection policy, originally issued in 2020. The review involved benchmarking the policy against those of other United Nations entities and analysing publicly available evaluations of whistleblower protection frameworks. The findings indicate that WFP's policy remains broadly consistent with those of comparable United Nations entities. The Ethics Office nevertheless intends to continue consultations and to revisit the policy in 2026, in conjunction with and to ensure alignment with reviews of other related WFP frameworks.

D. Standard setting and policy advocacy

40. Providing advocacy and guidance on the incorporation of ethical standards into WFP policies, practices and standards is another way in which the Ethics Office supports WFP in fostering an ethical culture and in reinforcing transparency and accountability.
41. In 2025, the Ethics Office consistently fulfilled its observer role on a number of key committees and task forces, which allowed it to be aware of and, where relevant, contribute to strategic, policy and procedural developments in order to reinforce WFP's commitment to its values, ethical governance and effective risk management. Among these bodies were WFP's risk and policy committees, the duty of care and inclusion committee, the private donors and partnership committee, and data management committee, and the interdisciplinary task force on protection from sexual exploitation and abuse. The office also actively provided inputs for more than 40 key policies, reports and reviews, including but not limited to WFP's localization policy, strategy on protection from sexual exploitation and abuse and sexual harassment for 2026–2029, artificial intelligence framework, and guidelines for research ethics, publishing and data use and sharing in WFP research activities.
42. In August 2025, a new Executive Director's circular on outside activities was issued. It updated Executive Director's circular ED2008/004,¹³ establishing a more transparent and robust framework for strengthening risk management and reinforcing WFP's continued commitment to integrity, professionalism and accountability. While the core requirement for employees to disclose and seek approval for outside activities remained unchanged, the circular introduced several enhancements, including clearer guidance on activities exempt from disclosure and approval, the formal delegation of approval authority to country and global headquarters directors with the option for sub-delegation, and a requirement that all approval or denial decisions be provided in writing and approvals periodically renewed. A comprehensive set of frequently asked questions was also released, offering practical examples, outlining common exceptions and giving managers clearer direction. In parallel, the Ethics Office worked closely with HRM to integrate the approval workflow into WFP's Workday platform, in order to streamline and strengthen the efficiency of the disclosure and approval process. The feature will be launched in early 2026.
43. To accompany the release of *Corporate guidance on WFP's Commitment to Operational Independence*,¹⁴ issued in April 2025, the Ethics Office partnered with the Emergency Preparedness and Response Service to develop and launch a "principled decision-making tool", a set of practical guidelines designed to support employees, especially those serving in country offices, in using ethical judgment in high-risk humanitarian settings. As WFP increasingly operates in complex and high-risk humanitarian environments, employees are often confronted with challenging ethical dilemmas in which humanitarian principles may come into tension; this tool is aimed at helping them navigate those dilemmas with clarity, integrity and sound judgment. In December the tool was presented in a webinar on WFP's approaches to operationalizing the humanitarian principles and dealing with humanitarian dilemmas, which was jointly hosted by the Emergency Preparedness and Response Service and the Ethics Office.
44. The Ethics Office continued to explore ways to use data-driven indicators to prioritize its outreach efforts and to support country directors. Towards the end of 2025, a year-end ethics report was piloted with a few country directors with the purpose of providing a high-level overview of their teams' engagement with the Ethics Office while fully

¹³ Executive Director's circular ED2008/004, *Disclosure of financial interests, outside activities and honours, decorations, favours, gifts or remuneration*.

¹⁴ WFP. 2025. *Corporate Guidance on WFP's Commitment to Operational Independence*.

safeguarding confidentiality. The initiative will be expanded in 2026, with the issuance of year-end reports timed to be helpful to country directors for completing the Executive Director's assurance exercise.

45. The Ethics Office continued to strengthen and broaden collaboration with key actors across WFP's internal justice system, including HRM, the Legal Office, OBD, the Office of the Inspector General, and the Workplace and Management Department. A cross-cutting driver of its 2024–2026 strategy, this collaboration is aimed at achieving a consistent and holistic approach to informing and supporting employees in addressing matters of justice and fairness in the workplace.
46. Coordination between the Ethics Office and HRM also remained strong, particularly in relation to training, including as part of induction training programmes and, as noted above, in the development of guidance on preventing retaliation under the employee support programme. Regular meetings between the Ethics Office and HRMSR were held to exchange relevant high-level indicators, enhance the efficiency and effectiveness of outreach efforts and identify potential policy and procedural improvements. In addition, robust engagement between the Ethics Office and the Risk Management Division continued, particularly for support and advice in relation to the management of organizational conflicts of interest and reputational risks, and alignment between ethical standards, governance processes and enterprise risk management.

E. Training, outreach and awareness raising

47. Training, outreach and awareness-raising are essential components through which the Ethics Office delivers on its strategic objective of ensuring that employees are equipped with the knowledge and tools needed to uphold an organizational culture grounded in ethical behaviour and aligned with the WFP Code of Conduct.
48. In line with its 2024–2026 strategy, the Ethics Office continued efforts to strengthen organization-wide understanding of and engagement on ethical standards through targeted and risk-based training, including several outreach and communications initiatives. This included leveraging digital platforms and enhancing leadership engagement and cross-functional collaboration in order to run high-impact activities. These efforts reinforced ethical expectations, increased learning uptake and embedded ethics more consistently into conversations within WFP, contributing to a culture in which ethical behaviour is recognized as a shared responsibility.
49. The Ethics Office employed a variety of approaches to identify needs and prioritize its outreach efforts and resources effectively. One of its key tools was a weighted risk model, or ethics risk map. This was originally developed in 2023 with assistance from the Innovation and Knowledge Management Division. It incorporates quantitative and qualitative indicators for identifying those country offices that may be most vulnerable to ethical challenges. Another important approach is individual consultations conducted by the Director of the Ethics Office with country directors, with a focus on directors assigned to a new country office within the last 6 to 12 months. These conversations aim at exploring areas where the Ethics Office can provide tailored support and outreach in order to strengthen ethical practice across country offices and remind country directors of their responsibilities for setting expectations for and maintaining "the tone at the top" for high ethical standards for their teams.
50. Complementing the abovementioned tools, in 2025 a short confidential survey was distributed to employees in country offices identified for outreach in order to gather insights into key ethical concerns and areas of interest. The survey responses, along with priorities set by the country directors, informed the planning of outreach and training efforts so that they were relevant and responded to the needs of WFP employees.

51. In 2025 the Ethics Office conducted more than 65 multilingual training sessions across 30 country and regional offices. Roughly 4,500 participants attended those sessions. Over the past three years the office successfully engaged with all country offices identified as high-risk through the ethics risk map, with the exception of two that are prioritized for 2026.
52. In-person training remained the most effective format for raising ethics awareness, familiarizing employees with the Ethics Office's services and engaging directly on ethical concerns. In-person training was conducted in seven country offices,¹⁵ including sub-offices. Where in-person training was not possible, whether due to scheduling, security or other issues, training was conducted online in multiple languages, including in 16 country offices.¹⁶ The training focused on matters such as the WFP Code of Conduct, conflicts of interest, the whistleblower protection policy and the ethical use of social media, alongside additional topics requested or prioritized by country offices.
53. Indicators of the success of these outreach efforts include active and positive participation in ethics training, a rise in ethics-related enquiries following training, and positive feedback from anonymous surveys about the effectiveness of the training.
54. The Ethics Office also conducted targeted training for human resources colleagues across all five regional offices and in three country offices. The training focused on strengthening the review of conflict of interest disclosure forms to ensure that candidate information is clear and complete and that potential risks related to conflicts of interest can be identified at an early stage.
55. The mandatory e-learning course "*Ethics at WFP*" continued to play a crucial role in reaching all employees in order to reinforce ethical awareness and expectations, including the message that ethical integrity is directly linked to ensuring that WFP operations remain transparent, impartial and aligned with WFP's humanitarian mission. Launched in 2023, the course must be retaken every three years. Completion of the course is integrated in employees' personal performance and competency assessments and probationary processes so that supervisors are aware of and can address non-compliance. By 31 December 2025, 98 percent of employees had completed the course, reflecting a strong commitment to ethical learning across the organization.
56. To further support ethical decision-making on a wide range of matters, the Ethics Office developed a series of mini e-learning courses addressing the most common enquiries from employees. These courses cover topics such as running a private business, protests and demonstrations, running for local elections, romantic relationships, personal relationships, teaching and speaking, and writing for publications. Following their design and development in 2024, the courses were made available in 2025 in the four WFP working languages and were promoted through various communication channels and campaigns.
57. The Ethics Office continued to innovate and explore ways to make online outreach effective and engaging. A one-week ethics campaign entitled "Ethics Starts with You", featuring daily messages, quizzes, videos and interactive tools, was developed and piloted in the Burkina Faso, Benin and Togo country offices. More than 300 employees were reached. Combining refresher content with digital learning and automated tracking, the initiative demonstrated the efficiency and replicability across country offices of short self-paced ethics learning materials.

¹⁵ Those in Colombia, Ecuador, Egypt, Ethiopia, the Niger, Peru and the Bolivarian Republic of Venezuela.

¹⁶ Those in Afghanistan, Barbados, Cambodia, the Central African Republic, Congo, Djibouti, Lebanon, Liberia, Mauritania, Nigeria, Pakistan, Sierra Leone, South Sudan, the State of Palestine, Uganda and the United Republic of Tanzania.

58. During 2025 the Ethics Office worked to increase the organization-wide visibility of ethics and standards of conduct through coordinated leadership and staff-facing communications. The office facilitated the Executive Director to send an all-staff message to mark the anniversary of the WFP Code of Conduct in June 2025, underscoring leadership's commitment to integrity, accountability and principled decision-making. Complementing this outreach, the office provided directors at global headquarters and country offices with comprehensive communication packages, equipping them with practical tools to engage in ethics-related conversations with their teams. These initiatives fostered a more unified approach to engagement on ethics and strengthened confidence in addressing ethical matters across the organization.
59. Building on efforts undertaken in previous years, the Ethics Office continued to reinforce staff understanding and awareness of the need for neutrality and impartiality by proactively monitoring scheduled national elections and providing country directors with a dedicated toolkit on political activities well in advance of elections. The toolkits provide guidance to help teams navigate ethical considerations, particularly in politically sensitive environments. This resource has consistently enabled employees to uphold WFP's commitment to navigating ethical considerations surrounding elections. In 2025, toolkits were distributed to 19 country offices, with many seeking additional support in effectively communicating relevant principles to their teams or confirming the toolkits' utility and timeliness.
60. Strong ethical leadership continued to be essential in shaping organizational culture. As in previous years and in coordination with HRM, the Ethics Office conducted a session entitled "Tone at the Top: Leading Ethically" as part of the annual induction programme for country directors and deputy country directors. Using real-life case studies, the session explored how to navigate complex ethical dilemmas in country office settings and clarified the role of the Ethics Office in providing guidance and supporting ethically sound decision-making. Maintaining this approach, a similar session was conducted for heads of field offices, and it was complemented by additional learning materials aimed at further strengthening ethical leadership at all levels of WFP. The office also continued to provide training for OBD respectful workplace allies so that they were well informed and able to direct colleagues to the Ethics Office when appropriate.
61. An ethics awareness month was organized by the Ethics Office for the first time in 2025. The campaign aimed to encourage reflection on ethical behaviour in day-to-day work, with a particular focus on integrity, conflicts of interest, neutrality and accountability. Human-centred storytelling helped to translate ethics from policy into experience, strengthening trust and engagement. A package of content was deployed through various internal communication channels, including all-staff messages, internal platforms, surveys, quizzes, storytelling and bite-sized learning. Engagement data showed a strong impact, with more than 8,000 views and high knowledge retention demonstrated by quiz results.
62. The Ethics Office conducted its annual awareness raising campaign on policies and practices related to the handling of gifts, providing guidance to prevent conflicts of interest arising from the offering or acceptance of gifts. The campaign reminded employees that they are required to decline any gift promptly and reminded partners about this obligation, encouraging them not to offer gifts to WFP or its employees. The campaign comprised several components, including sample communications for country and division directors to share with local partners; an all-staff email issued by the Director of the Ethics Office; and joint communications from the Ethics Office and the Supply Chain and Delivery Division sent to thousands of business partners worldwide and to local partners at headquarters, reaffirming WFP's policy of non-acceptance of gifts. In addition, localized awareness campaigns were launched in country offices during traditional gift-giving periods, which were positively received by country directors. In parallel, the brochure and dedicated

WFPGo page on gifts were updated to include practical guidance for country offices on appropriate practices for the handling and disposal of gifts.

F. United Nations coherence: the Ethics Panel of the United Nations and the Ethics Network of Multilateral Organizations

63. A core responsibility of the Director of the Ethics Office is to engage with ethics counterparts across the United Nations system to share best practices, foster coherence and collaboration and serve as a member of EPUN. EPUN brings together the heads of ethics offices of the United Nations Secretariat and of the separately administered organs and programmes of the United Nations. EPUN is chaired by the Director of the United Nations Secretariat's Ethics Office. The WFP Ethics Office, in line with a rotating responsibility of the EPUN members, will in 2026 serve as EPUN Alternate Chair and conduct the secondary review of requests for protection from retaliation related to United Nations Ethics Office's cases.
64. In 2025 the Director of the Ethics Office engaged actively with EPUN through monthly meetings, consultations on shared issues and reviews of secondary reviews of other EPUN members' whistleblower protection cases. The Ethics Office was also an active participant in an EPUN subgroup focused on strengthening collaboration in communication, outreach and training and optimizing the use of resources. This subgroup shared good practices on internal and external communications, awareness-raising tools and other outreach activities across EPUN. WFP shared its approach to using strategic storytelling to develop compelling staff profiles and conduct effective interviews, as well as its practical insights and experiences in using real-world scenarios for advising and training on conflicts of interest.
65. The Ethics Office remained active in the Ethics Network of Multilateral Organisations (ENMO), which comprises ethics officers from United Nations system entities, affiliated international organizations and international financial institutions. ENMO is a forum for exchanging information and good practices for professional development and benchmarking, whose objective is promoting system-wide collaboration on ethics-related issues.
66. In the interest of budget efficiency, it was decided that no one from the Ethics Office would physically attend the ENMO annual conference hosted by the Asian Infrastructure and Investment Bank in Beijing, China. The Ethics Office did, however, actively participate online, contributing to several panel discussions and making presentations on topics of common interest, including its ethics risk map exercise and the ethical use of social media. The Ethics Office was also a member of the ENMO CEB chapter,¹⁷ served as an alternate ENMO representative on the United Nations Mental Health Strategy Implementation Board and was a member of the membership committee of the ENMO executive committee. At the end of 2025, the Director of the Ethics Office was elected to serve on the ENMO executive committee, starting in 2026.

VI. Observations and conclusions

67. The Ethics Office confirms that its organizational independence was maintained throughout the reporting period and that it was able to perform its activities free from interference.

¹⁷ The Ethics Network of Multilateral Organizations (ENMO) United Nations System Chief Executives Board for Coordination (CEB) chapter is a group within ENMO composed of organizations that are part of the United Nations System Chief Executives Board for Coordination (CEB).

68. The office's budget for 2025 was subject to a 10 percent reduction, in line with budget reductions across WFP, but it was sufficient to cover its core activities and staffing costs, enabling it to carry out its responsibilities adequately during the reporting period.
69. Like all divisions of WFP, the Ethics Office has made necessary adjustments in the face of the more constrained and uncertain budgetary environment. Retention of fundamental ethics-related professional knowledge and skills was prioritized in making these adjustments. While hopeful that further cuts will not be necessary, the office has carefully prioritized travel expenditures while also continuing to explore other means of maintaining effective outreach and the timeliness and quality of response and feedback for all areas of its mandate. Such efforts will continue in 2026.
70. The year 2025 was one of uncertainty and profound change for the organization in which the Ethics Office maintained a sharp focus on the needs of country offices and on seeking means to broaden and deepen its outreach and its contribution to organizational policies and guidance. Looking ahead, as the new organizational structure and new strategic plan come into full effect, 2026 is expected to be a year of consolidation and stabilization, with the increasing need to prioritize and make sound choices. A significant number of staff are also expected to assume new supervisory or leadership roles, and the office will proactively engage with them to ensure that they are equipped to lead ethically. The Ethics Office will be listening carefully to understand evolving needs and to adapt accordingly so that it remains responsive and relevant, consistently helping all employees to respect and uphold WFP's core values and ethical standards.
71. The Ethics Office sees the potential for an increase in 2026 in requests and in the need for its support in terms of training and awareness outreach as a result of the fact that many employees are being affected by changes in their roles and new team structures and managers need increased support from the Ethics Office in rebuilding trust and reinvigorating a positive and values-based WFP culture. The Ethics Office continues to be a key safeguard against fraud, misconduct and reputational risk and ensures that the WFP Code of Conduct and WFP's values are always kept well in sight.

Acronyms

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| ADP | annual conflicts of interest and financial disclosure programme |
| CEB | United Nations System Chief Executives Board for Coordination |
| ENMO | Ethics Network of Multilateral Organizations |
| EPUN | Ethics Panel of the United Nations |
| HRM | Human Resources Division |
| HRMSR | Staff Relations Branch |
| OBD | Office of the Ombudsperson and Mediation Services |
| OIGI | Office of Inspections and Investigations |