Report on Fraud and Corruption

1st January - 31st December 2025

Table of Contents

1. Introduction

1. This report is submitted in accordance with the United Nations Environment Programme ("UNEP") Anti-Fraud and Anti-Corruption Guidelines ("AFAC Guidelines" or "the Guidelines"), which entered into force on 1st December 2020. More specifically, the present report has been prepared in line with paragraph 16 (a) of the Guidelines, which requires the UNEP Executive Director to provide an annual report to UNEP's governing body regarding fraud and corruption. Furthermore, paragraph 74 of the Guidelines indicates that UNEP shall prepare and make public on its website such annual reports. The present report covers the period from 1 January to 31 December 2025.

2. Preventing and addressing fraud and corruption at UNEP

2. Preventing and addressing fraud and corruption is an integral part of UNEP's day-to-day activities, personnel behaviour, and an essential pillar of programme and project implementation.

a. UNEP's policy and legal framework on fraud and corruption

3. The purpose of the AFAC Guidelines is to strengthen UNEP's prevention and response to incidents of fraud and corruption by:

   a) providing concrete and practical advice to UNEP staff members in identifying potential risk areas;
   b) providing a clear and user-friendly guide and reference for both external and internal audiences on control awareness measures put in place by UNEP which are aimed at monitoring fraud and corruption; and
   c) providing a consolidated procedure for sanctioning fraud and corruption.

4. These Guidelines are informed by the Anti-Fraud and Anti-Corruption Framework of the United Nations Secretariat (ST/IC/2016/25) (the "Framework"). The Framework promotes a culture of integrity and honesty within the Organization by providing information to staff members on how to prevent, detect, deter, respond to and report on fraud and corruption.

5. The Guidelines take into consideration the provisions and procedures in the Administrative Instruction on (ST/AI/2017/1) and the Secretary General's Bulletin on the Protection against retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations (ST/SGB/2017/2/Rev. 1).

6. In conjunction with the Framework, the Guidelines provide a clear definition of "fraud"[1], "corruption"[2] as well as "fraudulent acts".[3] It is important to note that fraud, corruption, and fraudulent acts, when established through the process of addressing prohibited conduct[4], constitute misconduct.

7. UNEP has a zero-tolerance approach to misconduct – including fraud and corruption – involving its staff members, other United Nations personnel or third parties engaged by UNEP.[5] "Zero-tolerance" means that UNEP will pursue all allegations of fraudulent acts involving any individual or entity covered by the regulations, rules, administrative issuances, policies, procedures, and agreements described in the Framework and that appropriate administrative/disciplinary measures or contractual remedies will be applied if allegations of fraudulent acts are substantiated. Furthermore, UNEP may, where deemed appropriate, recover loss suffered by the Organization or recommend the referral of matters involving credible allegations of criminal fraudulent acts to national authorities.

b. Completion of mandatory training on fraud and corruption

8. UNEP attaches great importance to the completion of relevant mandatory trainings by staff members. The UN has several learning programmes that are mandatory for all staff members to ensure familiarity with key regulations, rules, and processes. All UNEP staff are expected to become familiar with the contents of the Anti-Fraud and Anti-Corruption Framework and to comply with the guidance and principles established therein. The course on "Preventing Fraud and Corruption at the United Nations" is mandatory for all UN staff. It aims to increase the capacity of staff members to recognize fraud and corruption, to learn how the UN manages the risk of fraud and corruption, and to learn practical actions they can take to reduce fraud and corruption.

9. As of 31 December 2025, the completion rate of this mandatory course during the reporting period, was 97.%.[6] This was, on average, the same as the completion rate as of 31 December 2023.[7] While acknowledging the high rate of completion, UNEP continues to aim for 100% completion of this training by all staff (within 6 months of onboarding). Accordingly, the following measures were put in place: quarterly broadcasts reminding UNEP staff to complete all mandatory training; including completion of mandatory training is an integral part of performance evaluation; and denial of travel authorization for staff members who have not completed their mandatory training.

c. Raising awareness about fraud and corruption

10. UNEP continues to employ multiple platforms to update staff members on the policies and instruments concerning fraud and corruption. Information on the relevant rules and procedures (with hyperlinks) can be found on UNEP's Intranet.

11. UNEP certifying officers were consistently reminded of their obligations under the UNEP and UN regulatory framework, including the UN Financial Rules and Regulations. Additionally, their performance was evaluated based on compliance with these regulations, and where necessary, the delegation of authority for certifying officers was revised or revoked entirely.

12. In 2025, UNEP initiated a process simplification exercise. With regard to financial management, extensive discussions were held, and evaluations and recommendations were made, particularly concerning fraud and corruption awareness.

13. Furthermore, during partner validation and due diligence process, UNEP performs thorough risk assessments that focus on identifying risks related to fraud and corruption. Any identified risks are incorporated into a risk mitigation plan to ensure that appropriate actions are taken.

---

[1] "Any act or omission whereby an individual or entity knowingly misrepresents or conceals a material fact in order to obtain an undue benefit or advantage for himself, herself, itself or a third party, or to cause another to act to his or her detriment."
[2] Any act or omission that misuses official authority or that seeks to influence the misuse of official authority in order to obtain an undue benefit for oneself or a third party."
[3] "Any intentional misconduct that misleads, or attempts to mislead, a party to obtain a financial benefit or other benefit or to avoid an obligation and seek to evade detection."
[4] The UNEP Annual Conduct and Discipline Report provides information on the process for addressing prohibited conduct.
[5] Section X, Annex of the Anti-Fraud and Anti-Corruption Framework of the United Nations Secretariat.
[6] Numbers compiled by UNEP, Corporate Services Division, Human Resources Unit.
[7] Numbers compiled by UNEP, Corporate Services Division, Human Resources Unit.

14. In collaboration with UNON, UNEP's Operations and Risk Management Unit systematically conducts comprehensive physical inventories of its supplies, equipment, and other property. This ensures that UNEP assets records are up to date and that Organizational assets are managed and accounted for in accordance with relevant policies and regulations.

15. Finally, all UNEP property movements are monitored and documented by designated UNEP Equipment Focal Points to ensure accountability. These Equipment Focal Points are trained in asset management, verification, and disposal.

3. Reports of fraud and corruption by UNEP

16. Allegations of fraud or corruption may be transmitted to UNEP or the Office of Internal Oversight Services ("OIOS") by both UNEP personnel and external individuals or entities.[8] Details on how these reports are reviewed and processed may be found in the Annual Conduct and Discipline Report. These statistics feed into the DMSPC confidential Case Management Tracking System ("CMTS") that maintains the total figures of the fraud and corruption allegations received by UN Secretariat entities.

17. In 2025, UNEP received nine reports of alleged fraud and corruption. In total, UNEP handled 22 reports of fraud and corruption in 2025, 13 of which were carried over from the previous reporting cycles. These 22 reports are listed in Annex 1.

18. Out of the 22 reports, 3 have been closed while 19 remain open. Of the closed cases, one resulted in a reprimand issued to the staff member, while the other two were closed with no action taken, as the allegations were not substantiated.

[8] Reports of unsatisfactory conduct may either be reported to UNEP or OIOS. Reports submitted to OIOS may become known to UNEP if OIOS informs UNEP of such reports.

Annex 1

Reports of fraud and corruption cases carried over into 2025

Personnel	Conduct	Report Received	Details of report	Reporting Process	Status	Conclusion/Action taken/Sanction
Staff member	Forgery	06-Oct-23	The staff member forged a director's signature when hiring a consultant.	Reported to UNEP. Transmitted to OIOS/ID.	Closed	OIOS referred the matter to OHR. Reprimand placed in the staff member's file.
Implementing Partner	Misuse of project funds	25-Oct-23	Implementing Partner purchased a motor vehicle using project funds; managed a double accounting system for payments to national consultants; and, submitted false expenses.	Reported to UNEP. Transmitted to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Staff members	Misrepresentation	15-Dec-23	Staff members falsified information in PHP.	Reported to OIOS/ID. Referred to UNEP	Closed	Allegations not substantiated.
Staff member	Financial irregularity	17-Dec-23	Staff member authorized payment to consultants for unperformed tasks and attempted to cover it up.	Reported to UNEP. Transmitted to OIOS/ID. Referred to OHR	Pending	Pending with OHR.
Staff member	Property loss	16-Apr-24	The staff member incurred the loss of an official asset while serving as the asset focal point.	Reported to UNEP. Transmitted to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.
Staff members	Fraud, undeclared conflict	16-Apr-24	The staff members failed to declare a conflict of interest - commercial contract awarded to a company, whose managing director/Chief Executive Officer, was offered a consultancy.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Personnel/contractor	Forgery	06-Jun-24	The contractor falsified a document	Reported to OIOS/ID. Transmitted to OIOS/ID.	Pending	OIOS referred the matter to OHR. Pending with OHR.
N/A	Misuse of project funds	13-Jun-24	The entity mismanaged project funds.	Reported to OIOS/ID. Referred to UNEP	Closed	Allegations not substantiated.
Staff member	Property loss	18-Jul-24	The staff member incurred the loss of several official assets while serving as the asset focal point.	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.
Staff member	Travel irregularities	24-Jul-24	The staff member falsified their Daily Subsistence Allowance (DSA) claim	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.
Staff member	Abuse of authority, fraud	23-Aug-24	The staff member falsified details in their application for a vacancy and was selected due to a relationship with former staff member.	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.
Intern	Misrepresentation, forgery	25-Oct-24	Intern falsified employment history to obtain a UNEP internship, and upon expiry of the internship, forged documents to secure funding from the sponsoring Member State	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.

Personnel	Conduct	Report Received	Details of report	Reporting Process	Status	Conclusion/Action taken/Sanction
Staff member	Failure to honour private financial obligations	18-Nov-24	The staff member borrowed money from UNEP staff members and failed to repay them.	Reported to OIOS/ID. Referred to OHR	Pending	Pending with OHR and OLA.

List of reports of fraud and corruption cases 1 January – 31 December 2025

Personnel	Conduct	Report Received	Details of report	Reporting Process	Status	Conclusion/Action taken/Sanction
Staff member	Misrepresentation	2025	The staff member falsified work experience details in their application for a vacancy.	Reported to OIOS/ID.	Pending	OIOS referred the matter to OHR. Pending with OHR.
Implementing Partner	Fraud	29-Mar-25	The Implementing Partner was improperly selected.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Implementing Partner	Fraud	29-Mar-25	The Implementing Partner failed to return unspent project funds.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Retired Staff member	Forgery, fraud	14-May-25	The staff member facilitated disbursements to three implementing partners for personal gain.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Staff member	Financial irregularity	19-May-25	The staff member improperly withdrew money from the UNON SACCO, violating SACCO's policies.	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.
Consultant	Misrepresentation	11-Jun-25	The consultant failed to declaration that their mother works for the UN.	Reported to UNEP. Transmitted to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Staff member	Unauthorized outside activity	23-Jun-25	The staff member engaged in outside activities – Executive Officer of a housing cooperative and involved in the development and sale of plots.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Staff member	Fraud, abuse of authority	11-Jul-25	The staff member engaged in the unauthorized solicitation of funds from external partners.	Reported to OIOS/ID.	Pending	OIOS/ID investigation ongoing.
Staff member	Financial irregularity	5-Oct-25	The staff member engaged in prohibited conduct - financial and recruitment irregularities, mistreatment of personnel, exhibited racism/bias.	Reported to OIOS/ID. Referred to UNEP	Pending	Preliminary assessment ongoing.