

OFFICE OF INTEGRITY,  
COMPLIANCE AND  
ACCOUNTABILITY

# 2023

ANNUAL REPORT



**OFFICE OF INTEGRITY,  
COMPLIANCE AND  
ACCOUNTABILITY**

**20 ANNUAL  
23 REPORT**



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# STATEMENT FROM THE HEAD OF THE OFFICE OF INTEGRITY, COMPLIANCE AND ACCOUNTABILITY (ICA)

This Report outlines how ICA delivered significant value to the Caribbean Development Bank (CDB or the Bank) during 2023.

Each year, ICA prepares and publishes an annual report on the Bank's website, a summary of ICA's work to operationalise and manage CDB's Strategic Framework for Integrity, Compliance and Accountability (Strategic Framework) with regards to ICA's strategy, principles, pillars, mission and mandate. The Report is published pursuant to the principle of transparency, which is one of four key principles that underpin the Strategic Framework. The other three principles are excellence, accountability and integrity.

This Report is not an exhaustive review of ICA's work. It is a summary and divided into three parts to enable it to be easily understood by every CDB stakeholder, from the most devoted development banker to the young student who is keen to learn more about ICA's work. Part 1 provides a brief background of ICA's mandate and strategy. Part 2 provides a review of ICA's core activities and is structured thematically on ICA's four pillars. Pillar I covers Institutional Integrity, Ethics and Whistleblowing; Pillar II covers Compliance; Pillar III covers Accountability; and Pillar IV covers ICA's external collaboration with its stakeholders. The Collaboration Pillar enables ICA to learn, share its work and develop international best practices that can help enhance the evolution and effectiveness of the Strategic Framework and ICA.





Part 3 provides general information for Board of Directors (BOD) about ICA's internal review, human resources, challenges and brief outlook statement for 2024.

The last year was a challenging yet stable and successful period for ICA, as it continued its work as an independent office to maintain and strengthen CDB's robust internal governance framework, internal systems, and external operations. In 2023, ICA's work helped ensure that:

- (a) at the front-end, CDB maintained its role as a robust, credible and stable financial institution that is attractive to its members and its funders. ICA's work enabled CDB to receive and use funds effectively and disburse them to the intended beneficiaries in accordance with CDB's fiduciary duty to ensure CDB's resources are used for the intended purposes.
- (b) at all times, ICA identified risks proactively and worked to prevent reputational damage and financial loss from fraud, corruption and other related risks and activities; and
- (c) at the back end, ICA responded reactively to all complaints alleging integrity violations, ethics violations, accountability-related (environmental and social) harm and safeguard violations. ICA independently assessed, investigated and resolved all issues by itself or in collaboration with other stakeholders in other International Financial Institutions (IFIs) and borrowing member countries.

ICA's positive contributions helped to support CDB's internal governance and make the Caribbean a productive, stable and resilient place.



**TOUSSANT BOYCE, PH.D.**  
Head, Office of Integrity,  
Compliance and Accountability



**PART 1**  
PILLARS I, II and III:  
WHISTLEBLOWING,  
INTEGRITY, ETHICS,  
COMPLIANCE AND  
ACCOUNTABILITY





ICA's work is  
fundamental to  
CDB's internal  
governance  
architecture  
and its external  
operations.



# PILLARS I, II and III: WHISTLEBLOWING, INTEGRITY, ETHICS, COMPLIANCE AND ACCOUNTABILITY

## INTRODUCTION

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### The Strategic Framework and ICA

ICA is an independent office that was established by the BOD on March 18, 2015, pursuant to the Strategic Framework for Integrity, Compliance and Accountability (Strategic Framework). ICA's work started on the first day of its effective establishment on December 1, 2015. In January 2016, an accelerated operationalisation of the Strategic Framework commenced. The BOD oversees ICA through its Oversight and Assurance Committee (OAC).

ICA has a broad mandate to operationalise, manage and refine the Strategic Framework. ICA manages a convergence of five internal governance functions. These functions are institutional integrity (fraud and corruption), ethics (staff misconduct), whistleblowing, compliance (money laundering, terrorist financing and financial sanctions) and accountability for environmental and social harm allegedly caused by CDB-financed projects. The Accountability function is managed through a Project Complaints Mechanism (PCM).

### ICA's Strategy

ICA's work is fundamental to CDB's internal governance architecture and its external operations. ICA's strategy to operationalise the Strategic Framework relies on an approach that is fundamentally: (a) risk-based, (b) strategic to emphasise the prevention of violations, (c) incremental, and (d) phased. This approach requires the Strategic Framework to be operationalised in a manner that enables ICA to be dynamic, innovative and adaptive. Each year, ICA is required to evolve with agility to cover any changes to the Bank's mission and its Strategic Plan and to new internal and external risks.

ICA's work includes the detection, prevention and investigation of wrongdoing and the suspension and enforcement of sanctions imposed against wrongdoers. ICA's operationalisation strategy and work plan prioritise the prevention of wrongdoing and, when warranted, the expeditious conduct of independent investigations.

## PREVENTION

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Training staff members is a key pillar of successful prevention of wrongdoing in pursuit of the ICA's mandate. ICA designs and delivers training. However, the management of the Bank has the primary responsibility to ensure that all members of staff and management are trained. General training and awareness about the Strategic Framework, ICA and its work is also expected to be delivered to OAC and the full BOD, as necessary.

### (1) Orientation Training

Each new member of staff was required to attend ICA's orientation training when requested by the Human Resources Division (HRD). Pursuant to this HRD policy, on February 26, July 10 and July 12, 2023, ICA delivered orientation training to new members of staff.

### (2) Mandatory Annual Training

Annually, each member of staff is required to attend at least one of three ICA mandatory training sessions. This annual training is supplemented by other special, voluntary and targeted training delivered by ICA throughout the year on various topics. Targeted training is focused on supporting the work of a specific division, department or special topic. Special topics covered in recent years include cybercrime risks, gender-based violence, and sexual exploitation and abuse.

On March 2, 15, and 28, 2023, ICA delivered mandatory training and awareness sessions for all members of staff. A total of 98% of staff attended the training sessions. This training included:

- (a) Overview of CDB's Strategic Framework and ICA, which covered the background to CDB's observance of its fiduciary duty and the history, global developments and drivers that led to the creation of each of ICA's five functions. This part of the session enabled members of staff to gain insights into the origins, roles and functions of similar offices in CDB and other IFIs.
- (b) Case Studies on Integrity, Ethics, Compliance and Accountability, which used scenarios taken from the case history of ICA and other IFIs on a wide range of relevant ethical challenges like fraud, conflicts of interest, harassment, gifts, sexual exploitation and

abuse and other issues covered by CDB's Staff Code of Conduct. This section of the training placed special focus on the ethical conduct of staff members while working in the virtual environment and while travelling on a mission.

(c) Whistleblowing and Annual Reporting

- Duty to report and cooperate
- Demonstration: CDB Whistleblower System – How to report wrongdoing
- Demonstration: How to Use the New Annual Conflict of Interest Disclosure Portal

(d) Cybersecurity and Cyber-fraud which was delivered in collaboration with the Information Technology Solutions Division.

(e) Case Studies and Lessons Learned – Sharing from Select Cases/Investigations (2016–2023)

Members of staff were also required to complete an e-quiz based on ICA's mandatory training. Only members of staff who completed ICA's training were eligible to receive access to the online e-quiz. Members of staff who successfully completed the e-quiz received ICA Attendance Certificates.

### **(3) Management Training**

On April 6, 2023, ICA delivered mandatory training and awareness for the management of the Bank. The session focused on the following:

- (a) Sharing Lessons with management from ICA Mandatory staff training
- (b) Ethical leadership
- (c) Whistleblowing
- (d) Insights from ICA case studies 2016–2022

#### (4) Board Orientation and Training

On October 25, 2023, the Head, ICA, contributed to the Orientation Training for members of the BOD with a presentation on Ethics and the Directors' Code of Conduct. The training covered a range of topics, including:

- (a) Directors' responsibilities and applicable standards
- (b) Conflicts of interest
- (c) Gifts and hospitality
- (d) Confidentiality
- (e) Abuse of privileges and immunities
- (f) Relations with staff, reporting wrongdoing to OAC and ICA, and
- (g) Investigations of allegations of misconduct

## INTAKE, ADVICE, AND INVESTIGATIONS

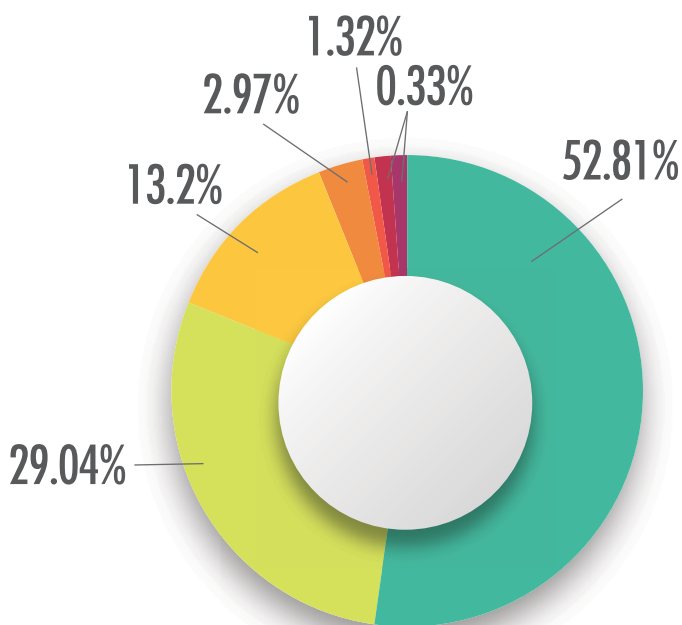
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At the end of 2023, there were 303 matters that reflected ICA's total intake of case reports and conflicts of interest submissions registered in the Case Management System from 2017 to 2023, from all intake sources, as illustrated in **Figure 1**, of which 143 are investigations, as illustrated in **Figure 2** below.<sup>1</sup> Both graphics illustrate the significant use of the Confidential Hotline Webform as the primary intake source.



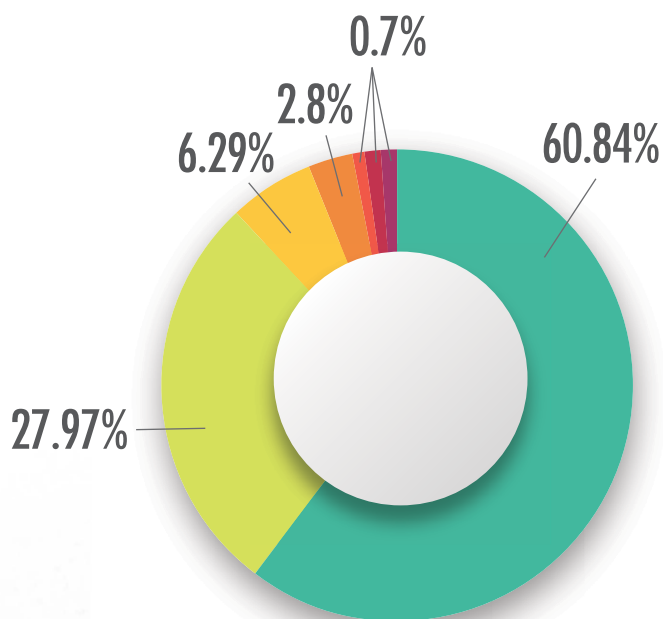
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<sup>1</sup> As is usual for similar offices, not all cases are recorded in electronic case management systems.



**Figure 1:**  
Intake sources for all registered matters in ICA's Case Management System

|              |            |        |
|--------------|------------|--------|
| REPORT FORM  | 160        | 52.81% |
| E-MAIL       | 88         | 29.04% |
| WEB          | 40         | 13.2%  |
| PHONE        | 9          | 2.97%  |
| N/A          | 4          | 1.32%  |
| NONE         | 1          | 0.33%  |
| CM INTAKE    | 1          | 0.33%  |
| <b>TOTAL</b> | <b>303</b> |        |

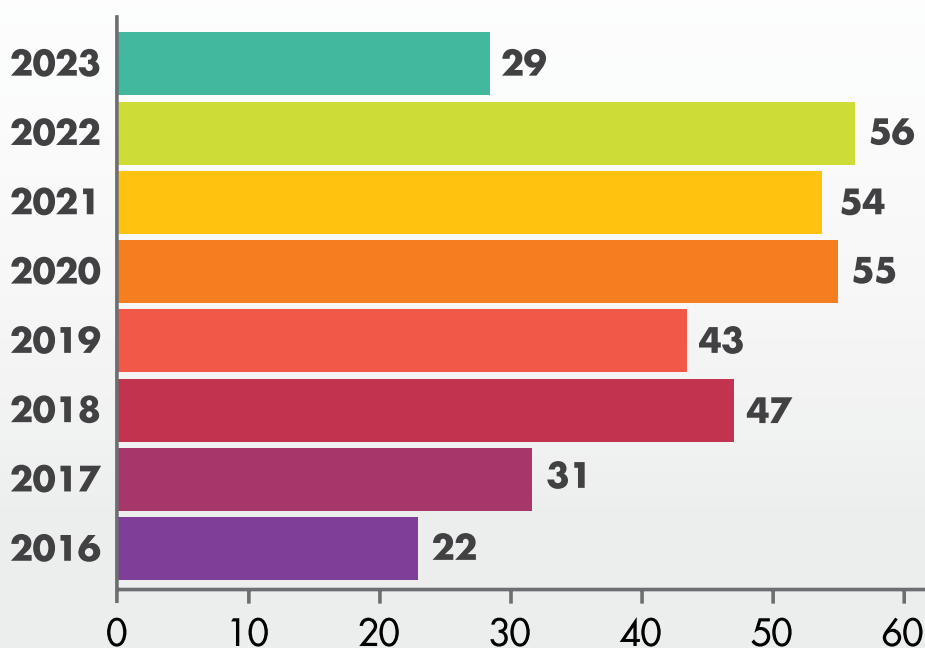


**Figure 2:**  
Intake sources for all investigations in ICA's Case Management System.

|              |            |        |
|--------------|------------|--------|
| E-MAIL       | 87         | 60.84% |
| WEB FORM     | 40         | 27.97% |
| PHONE        | 9          | 6.29%  |
| N/A          | 4          | 2.8%   |
| NONE         | 1          | 0.7%   |
| CM INTAKE    | 1          | 0.7%   |
| REPORT FORM  | 1          | 0.7%   |
| <b>TOTAL</b> | <b>143</b> |        |

During 2023, ICA did the following:

- (a) Managed 16 Integrity, Ethics and Accountability investigative activities, including 6 new matters and 11 matters carried over from 2022. There were 11 institutional integrity cases, 3 of which were new; 3 ethics cases, 1 of which was new; and 2 accountability cases, both of which were new. In terms of completion rate, 15 cases (93.75%) were resolved within 2023. The only unresolved case will be carried over to 2024.
- (b) Received 13 new requests for enhanced due diligence, which were all conducted successfully in accordance with ICA's Integrity Due Diligence (IDD) toolkit.
- (c) Received 72 conflict of interest submissions with disclosures for resolution. Annually, each member of staff is required to disclose whether there is any actual, apparent or potential conflict of interest between their private interests and their official duties to CDB and to attest to HRD that they have read and understood the CDB Staff Code of Conduct. Each submission is made digitally using a questionnaire through a Conflicts of Interest Portal managed by ICA, which helps CDB to detect, assess and resolve conflicts of interest confidentially and expeditiously. Submissions that contain specific sensitive disclosures are resolved by ICA and HRD.



**Figure 3**  
Investigative Activities including EDD managed each year (January 2016 to December 2023)



The investigative activities for 2023 represented a significantly positive downward trend compared to previous years. This was attributed to the positive effects of ICA's strategy to prioritise robust prevention work, including through training. To maintain this success throughout the year, ICA emphasized the need to continue to conduct effective outreach and training while increasing its capacity to expeditiously manage complaints and conclude investigations. Trained staff and stakeholders were also encouraged to continue to apply consistently, what they learned from training delivered by ICA.

## SANCTIONS

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On March 15, 2023, CDB's independent Sanctions Officer imposed a sanction on five external parties pursuant to an integrity investigation undertaken by ICA. The sanctioned parties are two firms and three individuals who have been debarred for six years and are not eligible to participate in CDB's projects from March 15, 2023, until March 14, 2029.

## OUTREACH

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During 2023–2024, ICA delivered targeted outreach workshops to Basic Needs Trust Fund (BNTF) offices. The training focused on prevention using BNTF insights from ICA's recent case experiences that are relevant to BNTF Offices.



*ICA Outreach to BNTF Office in St. Lucia*

The first outreach workshop was delivered to the CDB BNTF Office in Saint Lucia on July 28, 2023, followed by Saint Vincent and the Grenadines on October 31, 2023 and Grenada on November 21, 2023. The workshops provided an opportunity for ICA staff to meet with BNTF staff to raise awareness.



*ICA Outreach to BNTF Office in St. Vincent and the Grenadines*

Case studies were used to illustrate and share practical insights on the following:

- (a) CDB Strategic Framework
- (b) Work of ICA
- (c) Identification Management and Resolution of Integrity, Ethics and Accountability Risks in BNTF Offices
- (d) Lessons learned from ICA investigations

The workshops covered a wide range of ethical issues related to conflicts of interest, gender-based violence (sexual exploitation and abuse), sexual harassment, intimidation, harassment and bullying.

## **IMPLEMENTATION OF ICA PROCEDURES**

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During 2022 and 2023, ICA continued to implement the procedures outlined in the Investigations Manual, Sanctions Manual, and procedural steps for IDD undertaken pursuant to the Compliance Policy.



## DRAFTING AND REVIEW OF ICA POLICIES AND CDB PROCEDURES

ICA continued its work to:

- (a) draft policies and procedures specifically for ICA, such as the Conflicts of Interest Policy and Whistleblower Procedures;
- (b) review the Integrity and Ethics Policy, PCM Policy, Compliance Policy and the Whistleblower Policy for notification to OAC and revision by BOD; and
- (c) advise and assist CDB in revision to some general policies, including the Revised Code of Conduct, Professional Work Environment Guidelines and Sexual Harassment Policy.

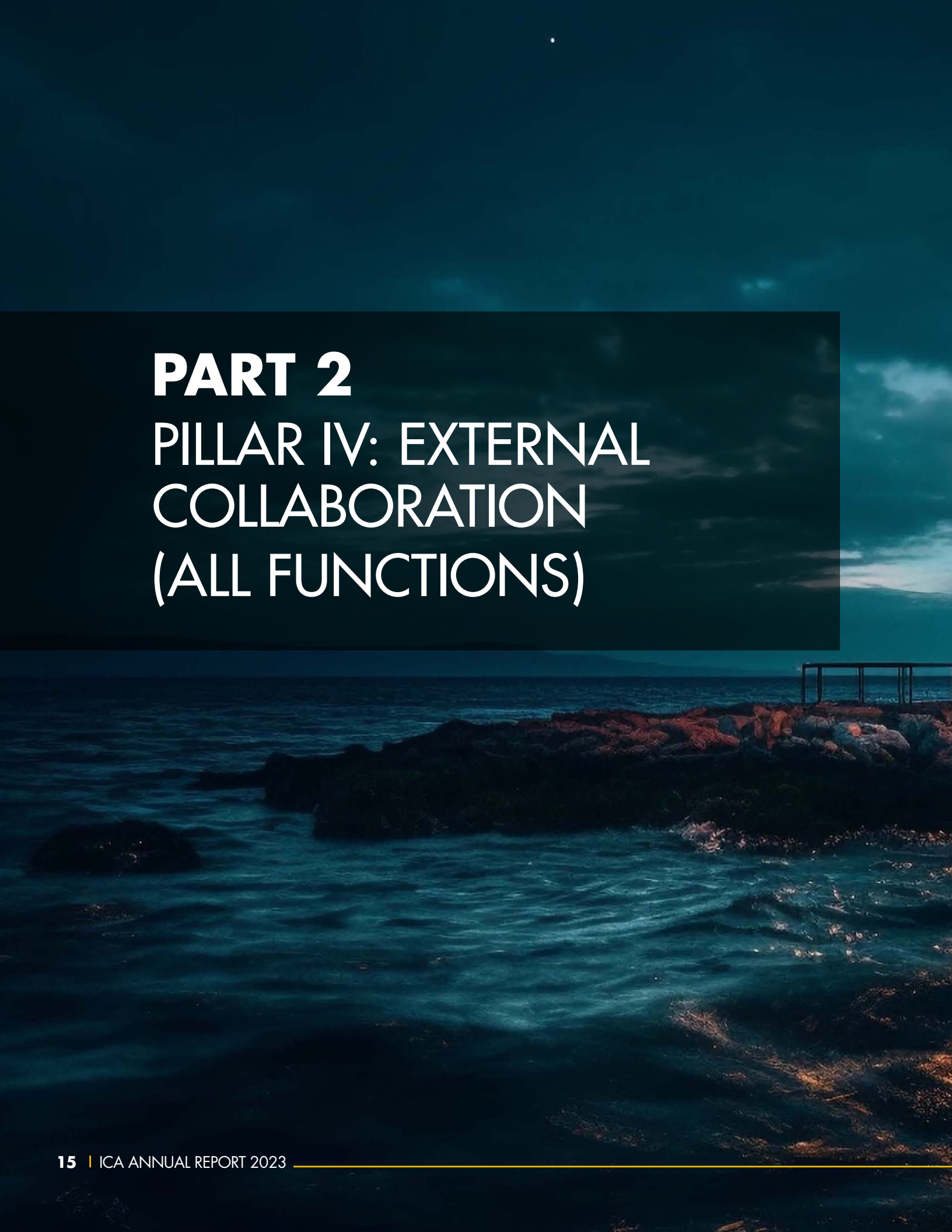


## CONSULTATIONS AND ADVISORIES

ICA provided advice and assistance to various offices at the Bank. ICA assisted the Operations Area on a wide range of matters, including responding to queries to CDB as conditions precedent to finalising funding agreements and conducting due diligence assessments to determine CDB's ability to manage and protect its funds from wrongdoing, abuse, money laundering and terrorist financing. Specifically, during 2023, ICA advised staff members on integrity and accountability provisions in 11 major financing agreements, due diligence checklists and other similar documents received by CDB for review and response to funders and other external parties.



*ICA Outreach to the BNTF Office in Grenada*



# **PART 2**

## **PILLAR IV: EXTERNAL COLLABORATION (ALL FUNCTIONS)**



## PILLAR IV: EXTERNAL COLLABORATION (ALL FUNCTIONS)

### **Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB) Annual Conference 2023, hosted by the Government of Guyana**

On April 17, 2023, pursuant to an invitation from CCAICACB, the Head of the ICA delivered an address at the Annual Conference of the CCAICACB. The presentation was entitled *'Factors that Impact Anti-Corruption Efforts in Pursuit of Sustainable Development of the Region.'* The presentation shared insights into 20 factors that impact anti-corruption efforts in the Caribbean and recommended solutions to assess and mitigate the impacts of these factors for the sustainable development of the Caribbean.

### **Annual Conference of the Association of Certified Anti-Money Laundering Specialists (ACAMS)**

From May 8–11, 2023, ICA attended the ACAMS Hollywood Annual Conference 2023 in Florida, United States of America. The conference provided training, insights and updates on various issues, including anti-money laundering compliance, financial crime, financial sanctions, cybersecurity, anti-fraud, anti-corruption, the role of AI, calibrating controls to address evolving Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) needs and de-risking of correspondent banking relationships in the Caribbean and Latin America.

### **Collaboration with other IFIs – Sharing About ICA's Use of Robotics for IDD**

On February 1, 2023, ICA was invited to share insights regarding CDB's use of robotics through the ICA Search Bot. This bot was developed in-house by CDB's Information Technology Solutions Division (ITSD) and ICA for conducting integrity due diligence in CDB's operations. In March and May 2023, ICA and CDB's Information Technology Officer (DevOps) met and shared insights about CDB's use of robotics for IDD with representatives from another IFI.

## Collaboration through the Conference of International Investigators (CII) – Training Institute for IFIs

On Thursday, June 1, 2023, the Head of the ICA, at the invitation of the CII, met with a team of investigators to share insights and discuss the development of a training institute and curriculum for the training of administrative investigators for IFIs. This initiative will enable ICA staff to receive training from CII in accordance with standards and best practices for conducting administrative investigations.

## United Nations (UN) Office of Internal Oversight Services, UN University and Finance Against Slavery and Trafficking event at High-Level Political Forum on Sustainable Development

ICA works both proactively and reactively to help ensure that CDB manages risks to CDB and supports Haiti regarding UN Sanctions. On July 14, 2023, the Head of ICA was a speaker on financial inclusion, sanctions, and solutions to de-risking on a panel discussion as a side event at the UN High Level Political Forum on Sustainable Development 2023. The event was titled “The Importance of Financial Inclusion and the UN Sanctions Regime to Reduce Modern Slavery Risks in Haiti.”



*Panel on Financial Inclusion and UN Sanctions on Haiti.*

While at the UN headquarters, the Head of ICA met with the Assistant Secretary General of the Office of Internal Services (OIOS) and the Director of the Investigations Division of the OIOS to discuss opportunities for collaboration between ICA and OIOS.

Some initiatives discussed included information sharing, staff work stints and training of ICA staff on the management and conduct of investigations of complaints of sexual harassment and sexual exploitation and abuse.

“The presentation shared insights into 20 factors that impact anti-corruption efforts in the Caribbean and recommended solutions to assess and mitigate the impacts of these factors for the sustainable development of the Caribbean.”

**Nominee Directorship Management Practices Symposium hosted by International Finance Corporation (September 26-27, 2023)**

Consistent with the BOD’s approval of the Private Sector Policy and Strategy in September 2023, the Head of ICA, upon the invitation of the Head of Compliance at the International Finance Corporation of the World Bank, attended the inaugural Nominee Directorship Management Practices Symposium.

This event was designed for the Heads of Integrity, Legal and Compliance offices in IFIs who manage integrity and accountability risks from nominee directorships. The meeting provided significant opportunities for ICA to collaborate, exchange and learn from other development partners to revise and enhance CDB’s framework for nominee directors to support the Bank’s private sector interventions. The content covered during the symposium included the following:

- (a) Scope of Nominee Directorships
- (b) Overseeing Directorship Management
- (c) Exercising Nomination and Appointment Rights
- (d) Tracking Value Add and Individual Performance of Nominee Directors
- (e) Managing Conflicts of Interest and Communication with Nominee Directors
- (f) Addressing the Climate Agenda
- (g) Embracing Technology and Potential AI Usage
- (h) Collaborating for Greater Impact Among IF Compliance Offices



## Independent Accountability Mechanisms (IAMnet) Heads 20th Annual Meeting 2023 (October 4–6, 2023)

The Head of ICA represented CDB at the IAMnet Annual Meeting, where he chaired two plenary sessions, the Governance Committee Meeting, and the Panel on the Role of the General Counsel (GC) in interactions with independent accountability mechanisms (IAMs) in IFIs.



The panel on GCs and IAMs explored the challenges and opportunities IAMs face when dealing with their oversight boards, management and legal offices and what their respective roles should be in interpreting policies and operating procedures. This panel and other panels with civil society organisations also explored the recent challenges to IAMs that arise from threats to their independence and overreach from management.



The Governance Committee is responsible for the overall management of IAMnet as the largest forum for IAM professionals in IFIs and its internal engagements, including membership of IAMnet.



*IAMnet Governance Committee (2023) meeting chaired by CDB*

### **Conference of International Investigators 2023 (Virtual) (November 7–10, 2023)**

ICA staff attended the CII, which was hosted by the European Bank for Infrastructure and Development and included sessions on:

- (a) Retaliation investigations with practical tips for investigators
- (b) Information exchange and cooperation among international organisations and donors
- (c) Sanctions
- (d) Challenges of small investigator offices
- (e) Women in investigations
- (f) Emerging risks and challenges in climate finance integrity
- (g) Trauma-informed investigations
- (h) Modern accountability mechanisms: Investigating in times of crisis.
- (i) Investigative collaborations with other control functions – opportunities and challenges

The Head of ICA attended and made a presentation at the Heads of Integrity Meeting 2023, during which he shared insights on the work of ICA and engaged with fellow Heads of independent integrity offices from other IFIs. The meeting covered many topics, including:

- (a) Using lead co-financier's integrity systems for investigations
- (b) Sexual exploitation, abuse and harassment allegations in MDB-funded projects
- (c) Development-related artificial intelligence and its use in integrity investigations.

### **ICA virtual meeting with Global Affairs Canada re UN and Canadian Sanctions re Haiti (November 23, 2023)**

On November 23, 2023, ICA met virtually with a team from Global Affairs Canada (GAC), led by the Executive Director for Haiti. The meeting was requested by ICA to deepen ICA's understanding of Canadian anti-gang sanctions regarding Haiti pursuant to UN Security Council Resolution 2653. It was intended to promote collaboration between ICA and GAC and assistance from GAC if needed to help CDB's work in Haiti.

The meeting was productive, insightful and helpful to ICA. Opportunities for future collaboration were discussed and agreed to help ICA manage risks to CDB from both UN sanctions and Canadian sanctions related to Haiti.

“The presentation shared insights into 20 factors that impact anti-corruption efforts in the Caribbean and recommended solutions.”

“ICA works both proactively and reactively to help ensure the CDB manages risks to CDB and supports Haiti regarding UN Sanctions.”



# **PART 3** ICA INTERNAL SELF-REVIEW OUTLOOK



The last year was a challenging yet stable and successful period for ICA, as it continued its work as an independent office to maintain and strengthen CDB's robust internal governance framework, internal systems, and external operations.

## ICA INTERNAL SELF-REVIEW

In January 2023, ICA initiated an internal self-review of its operationalisation of the Strategic Framework, a draft of which was circulated for OAC's review and discussion, together with suggested amendments to ICA-related policies. The self-review document is not an external independent review. It is not intended to be a performance review of individual ICA staff or ICA's daily activities and challenges, some of which are often complex, multi-disciplinary, and unpredictable. Specifically, it is intended to be used as a base document to:

- (a) review ICA's accelerated operationalisation and management of the Strategic Framework for Integrity, Compliance and Accountability in accordance with CDB's policies, ICA's mandate and international best practices;
- (b) illustrate the scope of work undertaken by ICA to date, taking into consideration CDB's risks, resources, needs and operating environment; and
- (c) inform OAC of areas for further internal or external independent review of ICA as provided for in the Strategic Framework, among other things, ICA's Terms of Reference (TOR), staff, strategy, independence, relevance, resources and effectiveness in accordance with ICA's TOR. Further, it was designed assist OAC in assessing any recommendations made by ICA for revision of key ICA-related and other policies to be amended to enhance the internal governance of CDB and the Board's own oversight role through OAC.

The self-review will be used by ICA as a living document that demonstrates progress in operationalisation and explores opportunities for refinement of the Strategic Framework. During 2024, it will be expanded and updated as necessary.

A photograph of a lighthouse at night. The lighthouse is white with a dark top section and a glowing lantern room. The Milky Way galaxy is visible in the dark blue night sky, stretching from the top left towards the center. The lighthouse is positioned on the right side of the frame, with a small white building at its base. The overall scene is serene and evokes a sense of guidance and resilience.

## OUTLOOK

ICA has a positive outlook on its ability to continue delivering its plans and strategy despite the challenges mentioned above. ICA plans to increase its prevention work, particularly outreach and thought leadership for the Caribbean, to minimise the need for investigations and, most importantly, to support CDB's internal governance and help the Caribbean become more productive, stable and resilient.



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